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Contents

1. Introduction 1
2. Scope & Objectives 1
3. Our approach to human rights Due Diligence 1
4. Supplier selection 2
5. Supplier Due Diligence Expectations 2
6. SEDEX requirements 3
7. Grievance Mechanisms 3
8. Communication with Ecotone 3

Annex 1: Human Rights principles 4
Annex 2: Anti-Bribery and Corruption 7
Annex 3: Due Diligence legislation and guidance documents 7

1. Introduction

Ecotone is the European leader of sustainable food: organic, vegetarian and fair-trade food. As a leading B Corp company, we aspire to drive positive changes for human rights, the environment and biodiversity. We know that our supply chains are subject to major societal, social and environmental challenges. For this reason, Ecotone has developed Human Rights and a responsible sourcing policies. Ecotone is committed to meeting its responsibility to respect human rights and we seek to establish relationships with entities that share the same principles and values.

2. Scope & Objectives

This Supplier Code of Conduct (SCoC) sets out Ecotone's due diligence approach in its own operations and its requirements of Suppliers, which includes all service providers, raw material, packaging and finished goods suppliers. Suppliers are expected to accept and adhere to this SCoC and take shared responsibility for meeting its requirements.

3. Our approach to human rights Due Diligence

When undertaking due diligence, Ecotone is guided by the due diligence guidelines and process of the Organization for Economic Co-operation and Development (OECD). Our Executive Board has ultimate responsibility for Human Rights, with a Steering Group and Taskforce reporting into them from across different business units. We have conducted a detailed human rights risk assessment,

including forced and child labour, using publicly available, reputable information. The risk analysis is repeated whenever appropriate, and annually as a minimum. Our most significant Human Rights risks lie with the raw materials we source or that are sourced by our 3rd party suppliers from our global supply chain. These raw materials are risk assessed via the SEDEX pre-assessment tool annually according to the Ecotone Human Rights Risk Assessment Procedure.

We recognize that we need to take steps to address any actual or potential adverse Human Rights impact which occurs directly or indirectly through our own operations or our business relationships. These risks are managed through tools such as Sedex Advance, third-party audits, third-party certifications and supplier visits, depending on risk ratings as described in our Human Rights Risk Assessment Procedure.

Ecotone ensures awareness and implementation of Human Rights within the company through training and roll out of relevant policies which include our Human Rights policy, Responsible Sourcing policy, whistleblowing policy, the Ecotone Code of Business Conduct and our anti-bribery and corruption policy (see appendix 2).

In our yearly "Sustainability Impact Report", we report on our commitments on biodiversity and social responsibility. We share information on progress on our website Biodiversity & Responsibility – Ecotone.

4. Supplier selection

Our processes for selecting and working with our Suppliers are set out in our GPC (General Conditions of Purchase), PQB (Product Quality Booklet) and Ecotone Responsible Sourcing Policy.

5. Supplier Due Diligence Expectations

There is increasing legislation addressing environmental impact, business and human rights, including, but not limited to the UK Modern Slavery Act, the German Supply Chain Act and the EU Corporate Sustainability Due diligence Directive. Ecotone has established a comprehensive risk management system to cover our due diligence obligations, of which this SCoC is an essential component. Ecotone expects its Suppliers' senior leaders to take responsibility for ensuring that this code of conduct is implemented and is resourced sufficiently to be effective.

Suppliers to Ecotone must:

- Meet Ecotone's SEDEX requirements (see section 6 below)
- Observe all the applicable law of the countries in which they operate, including but not limited to those listed in appendix 3.
- Support and respect human rights and strive to ensure that their activities do not directly or indirectly negatively impact human rights.
- Comply with Ecotone's zero tolerance approach to bribery and corruption (see appendix 2)

- Risk- assess their own operations and supply chains for potential and actual human rights risks, define an approach to risk mitigation and take appropriate actions.
- Ensure robust grievance mechanisms are in place to allow stakeholders (including local communities) to raise concerns and provide feedback about adverse human rights impacts that direct or indirect activities may cause.
- Provide appropriate and transparent remedy where any legitimate Human Rights infringement has been found.
- Comply with the International Labour Organization Conventions and Recommendations
- Meet the reporting requirements of the relevant national & international laws, e.g. Modern Slavery Act or EU Corporate Sustainability Reporting Directive, including but not limited to those listed in appendix 3
- Ensure that their products, services and shipments adhere to all applicable internal trade compliance laws, rules and regulations.

Supplier due diligence approaches cover the human rights principles listed in appendix 1.

6. SEDEX requirements

Suppliers to Ecotone are expected to register to SEDEX Advance, complete the SEDEX Self-assessment Questionnaire (SAQ), and allow access to their SAQ and audit report , including non-conformances, where these are available.
In addition, Suppliers to Ecotone are required to meet the specific additional SEDEX related requirement laid out in the PQB (Product Quality Booklet).

7. Grievance Mechanisms

Ecotone has a whistle-blowing policy for employees to raise concerns about how colleagues are being treated, or practices within our company or supply chain, without fear of reprisals. Any information is treated confidentially and promptly investigated. We expect our suppliers to have locally developed grievance procedures and procedures for resolving human rights issues. Grievance procedures should follow the United Nations Guiding Principles 'effectiveness criteria' (principle 31) for non judicial grievance mechanisms.

8. Communication with Ecotone

If human rights violations are discovered in a supplier's business or supply chain, they should immediately contact their allocated Ecotone Quality contact or buyer by phone and email. Ecotone actively encourages transparency and openness with its suppliers when issues occur. Ecotone will not tolerate retaliation of any kind against stakeholders who, in good faith, report breaches or violations of this SCoC or any other illegal conduct.
Ecotone invites its Suppliers to keep us regularly informed about their actions and improvement plans on Human Rights issues in their supply chains.



Annex 1: Human Rights principles

Supplier Due Diligence approaches should be based upon the below human rights principles:

Regular Employment

- To every extend possible work performed must be on the basis of a recognized employment relationship established through national law and practice
- Suppliers must provide workers with written and understandable information about the legal and contractual conditions of their freely chosen employment.
- Suppliers must not avoid obligations to employees under labor or social security laws and regulations arising from the regular employment relationship through the use of labor-only contracting, subcontracting and home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

Slavery/Forced Labour

- Suppliers shall not use forced, bonded and involuntary prison labour or any other form of involuntary labour.
- Workers shall not be required to lodge "deposits" or identity papers with their employer and must be free to leave their employer after reasonable notice.
- Suppliers are required to monitor any third party entity which assists them in recruiting or hiring employees, to ensure that people seeking employment at their facility are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views.

Wages & Benefits

- Suppliers shall pay workers at least the minimum wage required by local law, or the prevailing industry wage if no minimum wage law applies and shall provide legally mandated benefits. Wages shall always be enough to meet basic needs and to provide some discretionary income.
- Suppliers shall provide employees with written and understandable information about their working conditions and wages.
- Suppliers shall not deduct money from wages as a disciplinary measure nor shall any deductions from wages that are not provided for by national law be permitted without express permission of workers concerned.

Child Labour

- Suppliers shall not employ people younger than 15, or the minimum age for completing compulsory education in the country of manufacture, whichever is higher.
- Juvenile workers (ages 15-17) shall not perform work which is likely to compromise their health, safety or morals.
- Suppliers can hire juvenile workers when allowed by local law and should adopt proactive policies and measures to not permit juvenile workers to work overtime, to work at night or to work in hazardous conditions.

- Suppliers shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labour, to enable her or him to attend and remain in quality education until no longer a “Child”.

Working Hours – Overtime Wages

- Workers should not be required to work more than 48 hours per week on a regular basis and 60 hours a week at maximum, except in extraordinary business circumstances.
- Suppliers shall not require overtime and shall compensate overtime at a premium rate.
- Workers should be granted at least one day off in every seven-day period or, where allowed by national law, 2 days off in every 14-day period.

Harassment and Abuse

- Suppliers shall treat employees equally, with dignity and respect at all times. As such, Suppliers must not allow employees to be subjected to any form of intimidation, physical abuse or bullying, including but not limited to sexual, physical, psychological or verbal harassment, gender-based violence or any other form of intimidation.

Equality, inclusion and freedom from discrimination

- Suppliers shall not engage in, support or tolerate any forms of direct or indirect discrimination in employment, including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement, on the basis of race, religious belief, color, gender, pregnancy/childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, medical condition, illness, genetic characteristics, family care, marital status, caste, socio-economic situation, political opinion, union affiliation, ethnic group, illness or any other classification protected under applicable law.
- Suppliers must be committed to promote non-discrimination and gender equity, by treating all Workers in a fair manner.

Freedom of Association and Collective Bargaining

- Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining.
- Suppliers shall not discriminate against worker representatives or restrict their access to carry out representative functions in the workplace.

Health and Safety Conditions

- Suppliers shall comply with applicable health and safety laws and regulations and provide ensure a safe and hygienic working environment. Accommodation where provided, shall be clean, safe and meet the basic needs of workers.
- Suppliers shall ensure access to clean toilet facilities and to safe and clean drinking water. If appropriate, sanitary facilities for food storage, shall be provided

- Suppliers shall provide regular and recorded health and safety trainings, such training should be repeated for new or reassigned workers.
- Employees must have the right to leave the company premises in dangerous situations without having to ask for permission.
- Responsibility for health and safety shall be assigned to a senior management representative.

Respect for the Rights of Indigenous and Local Populations

- The Supplier respects the rights of indigenous communities and the local populations in the places where it operates as well as in its supply chain. The Supplier applies the UN-principle of free, prior and informed consent (FPIC).

Third party labour agencies

- Relationships with labour agencies shall be governed by contracts and Service Level Agreements which meet national legal requirements and the requirements of this Code of Conduct.
- Labour agencies should be audited on a regular basis to ensure compliance with this Code and national legal requirements.

Smallholders

- Where smallholders exist in the supply chain, suppliers will contract with them responsible ensuring that smallholders basic incomes are met (such as can be found in international living income benchmarks).
- Suppliers shall work with smallholders to ensure they meet the relevant requirements of the Code of Conduct.

Gender balance

- Suppliers shall promote gender balance, i.e. promoting equal participation of women and men in all areas of work, projects or programs and promoting equal rights, responsibilities and opportunities for women and men.

Environment

- Suppliers, in line with their commitment to sustainable development, shall do all that is reasonable and practicable to minimize adverse impacts on the environment and people. This includes; allowing the natural bases for the preservation or production of food and safeguarding the health and well-being of people and natural ecosystems.
- There shall be no unlawful eviction or unlawful taking of land, forests or waters which secure the livelihoods of a person and suppliers must
- Suppliers shall ensure that 100% of commodities production for Ecotone products covered by the EUDR are free from deforestation and natural ecosystem conversion by 2025.



Annex 2: Anti-Bribery and Corruption

- Bribes in any form are unacceptable to Ecotone.
- Any personal payments or bribes to individuals employed by Ecotone's suppliers, to government or regulatory officials or receipts of bribes or personal payments by Ecotone employees are strictly prohibited.
- Ecotone expects its suppliers to strive for compliance with the highest levels of transparency and accountability throughout its company.
- Records of transactions should be maintained in an accurate, complete and timely manner in accordance with the relevant accounting principles.
- No unregistered funds or assets may be established or maintained.
- Personal gifts or favours of a commercial value of €250 (or its equivalent) or above, may not be made or accepted by any Ecotone employee.

Annex 3: Due Diligence legislation and guidance documents

The following instruments offer guidance on international Human Rights Standards and their implementation:

- the UN Global Compact and UN Sustainable Development Goals (SDGs);
- the Universal Declaration of Human Rights;
- the UN Guiding Principles on Business and Human Rights;
- the UN Convention of the Rights of the Child;
- the UN Convention on the Elimination of All Forms of Discrimination against Women;
- the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ETI-base code;
- the OECD Guidelines for multinational enterprises;
- the OECD-FAO Guidance for Responsible Agricultural Supply Chains;
- the EU Corporate Sustainability Due Diligence Directive;
- the EU Corporate Sustainability Reporting Directive
- the EU Regulation on prohibiting products made with forced labour on the Union market
- the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)
- the French Corporate Duty of Vigilance Law
- the UK Modern Slavery Act
- The Norwegian Transparency Act
- The Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour