



# SUPPLIER CODE OF CONDUCT

April 2021



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## EXPECTATIONS FOR CSM INGREDIENTS SUPPLIERS

CSM Ingredients holds its suppliers to the same standards of integrity to which it holds its colleagues. An unethical or illegal act of a supplier may hurt the reputation and cause a loss of goodwill in the communities CSM Ingredients serves. Therefore, all suppliers must comply with the Supplier Code of Conduct as a condition of doing business with CSM Ingredients. Suppliers include any third-party vendor, consultant, contractor, service provider or supplier of raw materials, ingredients or packaging components. Suppliers should be selected based on merit, quality of service and reputation.

CSM Ingredients is committed to ensuring that working conditions in CSM Ingredients' supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. CSM Ingredients' suppliers are obligated, in all of their activities, to operate in full compliance with the laws, rules, and regulations of the countries in which they operate. This Supplier Code of Conduct goes further, drawing upon internationally recognized standards in order to advance social and environmental responsibility.

### 1 BUSINESS INTEGRITY

Any and all forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited and may result in termination of any or all supply agreements with CSM Ingredients and possible legal action. Records prepared for CSM Ingredients, including records of work time and expenses, shall be accurate, truthful and complete, and shall meet applicable standards and requirements.

#### 1.1 Proper Use of Company Assets and Information

Suppliers shall protect and conserve any resources made available by CSM Ingredients and shall use them only for purposes authorized by CSM Ingredients. CSM Ingredients resources include tangible items, such as vehicles, equipment, facilities, consumables, and computer and communication systems, as well as intangible items, such as CSM Ingredients' good name and reputation, employee productivity, and sensitive information.

Suppliers shall respect and not infringe the intellectual property ownership rights of CSM Ingredients and others, including, but not limited to, proprietary information, copyrights, patents, trademarks, and trade secrets.

Suppliers shall protect CSM Ingredients' confidential information and shall not divulge any CSM Ingredients information that a prudent business person would consider sensitive or which is designated by CSM Ingredients as sensitive, proprietary, or confidential. Such information includes, but is not limited to, strategic, personal, financial, or unpatented technology information. Suppliers shall not use or allow the use of such information for securities transactions or any improper private gain. It may be appropriate in some cases for CSM Ingredients and suppliers to agree to additional specific nondisclosure provisions. Suppliers shall not purport to make any announcements



or release any information on behalf of CSM Ingredients to any member of the public, press, official body, business entity, or other person, or claim or imply any endorsement by CSM Ingredients or CSM Ingredients employees, without the express prior written consent of CSM Ingredients.

## 1.2 Accuracy of Business Records

Suppliers shall record and report facts accurately, honestly and objectively. Records must be accurate in all material respects. Do not hide, fail to record, or make false entries. All financial books and records must conform to generally accepted accounting principles.

## 1.3 Fair Competition and Antitrust

Suppliers representing CSM Ingredients are expected to comply with all applicable laws and regulation regarding fair competition and antitrust.

## 1.4 Working Documents

Suppliers must only employ Workers with the legal authorization to work. Authorization must be validated by the appropriate legal documentation.

## 1.5 Whistleblowers

Suppliers must create programs to ensure the protection of worker whistleblower confidentiality and to prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of this Supplier Code of Conduct.

## 1.6 Subcontractors

CSM Ingredients expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Supplier Code of Conduct or equivalent set of principles.

# 2 WORKPLACE STANDARDS & PRACTICES

## 2.1 Non-Discrimination

Suppliers may not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination, and retirement. Suppliers may not require a pregnancy test or discriminate against pregnant workers except where required by applicable laws or regulations. In addition, suppliers may not require workers or potential workers to undergo medical tests that could be used in a



discriminatory way except where required by applicable law or regulation or prudent for workplace safety.

## 2.2 Harassment

Suppliers must be committed to a workplace free of harassment. Suppliers may not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.

## 2.3 Forced Labor

Suppliers may not use any form of forced, bonded, indentured, or prison labor. All work must be voluntary and workers should be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

## 2.4 Rules Regarding Physically Demanding Work

Suppliers must identify, evaluate, and control worker exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

## 2.5 Child Labor

Suppliers may only utilize child labor that is permitted by International Labour Organization guidelines. Hazardous work may not be done by anyone below the age of 18 and such individuals must provide documented informed consent.

## 2.6 Working Hours

Suppliers must provide for reasonable working hours, including maximum work hours, overtime, vacation time and leave periods and public holidays. Work schedules must comply with all applicable laws, collective agreements, and contracts negotiated with CSM Ingredients.

## 2.7 Wages and Benefits

CSM Ingredients expects suppliers to compensate their workers fairly and competitively relative to their industry in full compliance with applicable local and national wage and hour laws, and to offer opportunities for workers to develop their skills and capabilities. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for



by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

## 2.8 Freedom of Association

In the event their workers have lawfully chosen to be represented by third parties, CSM Ingredients expects suppliers to bargain in good faith and not to retaliate against workers for their lawful participation in labor organization activities.

# 3 QUALITY, HEALTH & SAFETY

## 3.1 Product Quality & Safety

Suppliers must provide CSM Ingredients with high-quality products, ingredients, and services that meet all applicable quality and food-safety standards. Suppliers must demonstrate that they have robust food safety and quality management systems, following Hazard Assessment and Critical Control Points (HACCP) principles. Suppliers must immediately report to CSM Ingredients any concerns about product safety.

## 3.2 Health and Safety Practices

Suppliers must apply safe work practices (including regulatory and contract specific requirements) to all activities and exercise good judgment in work decisions. Suppliers performing work on CSM Ingredients property or on behalf of CSM Ingredients must instill safety in every aspect of their work processes and in the attitude and behavior of all their workers. When working or performing services at the, offices, plants, warehouses and other properties and facilities of CSM Ingredients, Suppliers must adhere to the safe work practices and policies of CSM Ingredients with respect to those locations.

## 3.3 Occupational Safety

Suppliers must also establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems should encourage worker reporting, classify, and record injury and illness cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate the workers' return to work.

## 3.4 Work Environment

Workers shall be provided access to clean toilet facilities and to potable water and, if appropriate, sanitary facilities for food storage. Accommodation, where provided, shall be clean, safe and meet the basic needs of the Workers.



### 3.5 Emergency Prevention, Preparedness, and Response

Suppliers must anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans.

### 3.6 No Alcohol or Drug Use

Suppliers must not report to work or engage in any work for or on behalf of CSM Ingredients, or in any fashion represent, or make any representations on behalf of CSM Ingredients, while under the influence of illegal drugs or alcohol. In addition, suppliers may not possess illegal drugs or controlled substances while on CSM Ingredients premises or while conducting business with or for CSM Ingredients. This prohibition does not include legally obtained medications used as directed by a licensed medical practitioner that do not create a safety risk (e.g., impairment while operating machinery).

## 4 ENVIRONMENTAL PRACTICES & LAND RIGHTS

### 4.1 Environmental Practices

All local laws and regulations must be met and operations conducted in a manner that conserves resources. All waste materials and production by-products should be disposed of properly and in an environmentally responsible manner. Violation of the foregoing may result in cancellation by CSM Ingredients of any purchase orders or supply agreements without any liability to CSM Ingredients.

### 4.2 Hazardous Substance Management

To ensure safe handling, movement, storage, recycling, reuse, and disposal, suppliers must identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal. Suppliers must post Material Safety Data Sheets in the primary language of its workers for any hazardous or toxic substances used in the workplace and train workers who will come into contact with such substances in the workplace.

### 4.3 Wastewater and Solid Waste Emissions

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities must be monitored, controlled, and treated as required by applicable laws and regulations before discharge or disposal.





#### 4.4 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations must be characterized, monitored, controlled, and treated as required by applicable laws and regulations before discharge.

#### 4.5 Pollution Prevention and Resource Reduction

Suppliers must endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in its facilities, in its maintenance and production processes, and by recycling, re-using, or substituting materials.

#### 4.6 Permits and Reporting

Suppliers must obtain, maintain, and keep current all required environmental permits (e.g. discharge monitoring) and registrations and follow the operational and reporting requirements of such permits.

#### 4.7 Land Rights

Suppliers must respect the land rights of women and communities affected by their operations and sourcing practices, and must ensure transparent reporting and disclosure of concession agreements and/or operating permits to affected communities. Suppliers must ensure fair negotiation on land transfers and must refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products and services to CSM Ingredients, adhering to the principle of Free, Prior and Informed Consent. Suppliers must identify small-scale producers to ensure they have access to fair market value for their crops, goods or services.

### 5 COMPLIANCE

CSM Ingredients reserves the right to terminate its business relationship with any supplier who violates this Supplier Code of Conduct or whose suppliers or subcontractors violate this Supplier Code of Conduct. CSM Ingredients reserves the right to terminate its business relationship with suppliers who fail to provide written confirmation to CSM Ingredients that they have a program in place to monitor their suppliers and subcontractors for compliance with this Supplier Code of Conduct.

#### 5.1 Transparency

Suppliers should adopt a transparent approach to working with CSM Ingredients, including the disclosure of relevant policies and procedures. If requested, supplier discloses the geographical location of facilities producing raw materials for CSM Ingredients, as well as the origin of raw materials within the suppliers own direct supply chain. Supplier will take responsibility to



implement the requirements of this Code of Conduct and associated due diligence processes with those in its own direct supply chain.

## 5.2 Management Accountability

Suppliers must manifest their commitment to implementation of the principles of this Supplier Code of Conduct by having or establishing an appropriate management system to address compliance with these principles and detection and correction of any non-compliance. An appropriate management system should contain the following elements:

- **Management Accountability:** Executive responsibility for ensuring implementation and periodic review of the status of the management systems. ☐ **Legal and Customer Requirements:** Identification, monitoring and understanding of applicable laws, regulations and customer requirements, and procedures for reviewing compliance and correcting any deficiencies.
- **Communication:** Process for communicating clear and accurate information about a supplier's performance, practices and expectations to workers, suppliers, and customers.

## 5.3 Audits and Inspections

Each supplier should conduct audits and inspections to ensure their compliance with this Supplier Code of Conduct and applicable legal and contractual standards. In addition to any contractual rights of CSM Ingredients, the supplier's failure to observe the Supplier Code of Conduct may subject them to disciplinary action, which could include termination of the supplier relationship. Failure to comply with this Supplier Code of Conduct will be sufficient cause for CSM Ingredients to exercise its right to revoke the supplier's approved status. CSM Ingredients reserves the right, as a condition of continuation of approval, to conduct (or have its designee conduct) periodic, unannounced inspections of suppliers and their facilities and business practices to verify compliance with these standards.

# 6 REFERENCES

## 6.1 Workplace Standards and Practices

- **International Labour Organisation (ILO) Guidelines:** The main aims of the ILO are to promote rights at work, encourage decent employment opportunities, enhance social protection and strengthen dialogue on work-related issues. <http://www.ilo.org/global/standards/lang--en/index.htm>
- **Ethical Trading Initiative (ETI) Code:** The ETI Code is founded on the conventions of the ILO and is an internationally recognized code of labor practice. <http://www.ethicaltrade.org/eti-base-code>
- **SEDEX Members Ethical Trade Audit (SMETA):** SEDEX members developed an audit protocol based on best practices and is designed to reduce duplication in ethical trade auditing. It is not



a code of conduct or a methodology, rather it is an audit format composed of industry leading practices. <http://www.sedexglobal.com/ethical-audits/smeta/>

## 6.2 Environmental Practices & Land Rights

- Roundtable on Sustainable Palm Oil (RSPO): RSPO is the leading certification body for sustainable palm oil. Additional information about sustainable palm oil practices, certification processes and membership requirements can be found at: <http://www.rspo.org/>
- Free, Prior and Informed Consent: Indigenous peoples have the right to give, or withhold, their free, prior and informed consent to actions that affect their lands, territories, and natural resources in order to control their own future. [https://www.culturalsurvival.org/sites/default/files/guidetofreepriorinformedconsent\\_0.pdf](https://www.culturalsurvival.org/sites/default/files/guidetofreepriorinformedconsent_0.pdf)

## 6.3 Quality, Health & Safety

- Hazard Assessment and Critical Control Point (HACCP) Principles: HACCP a management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement and handling, to manufacturing, distribution and consumption of the finished product. <http://www.fda.gov/Food/GuidanceRegulation/HACCP/>