



Sustainability Policy

This document describes ED&F Man Commodities Group's Sustainability policy. It applies to all businesses within the Commodities Group.

This document should be read and executed in compliance with the ED&F Man Group Standards of Business Conduct.

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From the Commodities Board:

Building a sustainable, responsible business that delivers positive impact for our people, our communities and the planet has been an important part of our long history and proud heritage and continues to underpin the way we do business around the world today. Sustainability is a core focus and is at the heart of everything we do at ED&F Man.

Our sustainability programme aims to support responsible growth and helps us limit the impact of our operations on the environment, provide customers with safe products and embed ethical principles within our operations worldwide.

The programme has three key focus areas: Environmental Stewardship, Improving Lives, and Responsible Sourcing. Each of these has metrics and objectives that enable us to run our businesses in a responsible fashion.

The foundation of this policy lies within our culture and values. We are committed to doing business ethically and we will not compromise on our obligations to our customers, employees and the environment and the communities in which we work.

On behalf of the Commodities Board,

Chris Mahoney
Chair
November 8, 2024

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This Sustainability Policy describes our sustainability programme, ambitions, principles and priorities.

The ED&F Man Sustainability Committee supports the Commodities Board with its oversight responsibilities and ensures the Group meets our declared commitments, obligations and goals in respect of sustainability.

We use the term 'sustainability' to cover many areas at ED&F Man including Environment, Social, Governance (ESG), Equity, Diversity and Inclusion (ED&I), and what was formerly referred to as Corporate Social Responsibility (CSR).

Our vision

ED&F Man is committed to doing business ethically. We value our people, the environment, and the communities in which we work.

Our mission

We will conduct our business with integrity and will respect our sustainability commitments.

We will work with our customers, suppliers and stakeholders to achieve shared goals.

We aim to:

- Reduce the environmental impact of our products and businesses
- Improve the quality of life for our employees and people in our value chain through improved company policies and impact projects
- Provide supply chain assurance and reduce sourcing risks

Our Sustainability programme

Our Group Standards of Business Conduct (SBC) and related Policies set minimum requirements for:

- environmental management
- safe workplaces
- safe products
- ethical conduct, such as anti-bribery, anti-money laundering and whistle-blowing

Our sustainability strategy was updated in January 2023, and we will continue to update this Policy document as we make progress on our sustainability journey.

We deliver our sustainability programme through the following three focus areas:

<h2>Environmental Stewardship</h2>	<h2>Improving Lives</h2>	<h2>Responsible Sourcing</h2>
<h3>Metrics</h3> <p>Develop climate action plan with decarbonisation goal</p> <p>Commit to Deforestation and Conversion Free (DCF) Supply Chains</p>	<h3>Metrics</h3> <p>Implement community projects</p> <p>Improve Group Equity, Diversity & Inclusion</p> <p>Zero workplace accidents</p>	<h3>Metrics</h3> <p>Increase % responsibly sourced products</p> <p>Measure supplier compliance against DCF targets</p>
<h3>Rationale</h3> <p>Improve the environmental impact of our products and businesses</p>	<h3>Rationale</h3> <p>Improve quality of life for our employees and people in our value chain through improved company policies and impact projects</p>	<h3>Rationale</h3> <p>Provide supply chain assurance and reduce sourcing risks</p>
<h3>UN Sustainable Development Goals</h3>	<h3>UN Sustainable Development Goals</h3>	<h3>UN Sustainable Development Goals</h3>

Principles

We do business in a fair, ethical and sustainable way. We will be transparent about our products and services, and their effects on people, the environment and society.

Important principles for our Sustainability Policy include:

- United Nations Declaration of Human Rights
- Conventions of the ILO (Fundamental rights of the employee)
- OECD guidelines for multinational enterprises

Priorities

All our business units operate in line with the following priorities:

Priority 1 - Legal compliance

We comply with relevant laws and regulations by ensuring:

- our businesses are registered and operate officially
- we carry on our business with the aim of having a minimum effect on the environment
- human-rights and labour laws are respected
- businesses have the requisite permits and approvals

Priority 2 - Operating responsibly

We maintain business relationships with relevant parties (for example, local suppliers, customers, governments, authorities and communities) and use local labour and resources (suppliers, contractors, consultants) so that we positively contribute to the economy.

Priority 3 - Compliance with fair-operating practices

We work ethically, comply with competition laws (also known as antitrust laws) of every country in which we operate, and work against all forms of corruption, including extortion and bribery.

We do business ethically by:

- following the ED&F Man Group Standards of Business Conduct
- complying with all laws and regulations that apply
- respecting local customs, and using tried and tested international working practices
- not accepting, offering or paying any bribe and complying with rules on gifts and entertainment
- complying with restrictions on communicating with competitors for marketing and selling products
- avoiding any conflicts of interest

Priority 4 - Customer dialogue and co-operation

We combine local knowledge with global presence. This allows us to provide local support and to work closely with our customers. We seek to co-operate internationally and partner with suppliers in order to better serve our customers.

Priority 5 - Customer satisfaction

We continuously improve our products and services through use of customer feedback.

We place responsibility in the hands of the people closest to our customers to ensure our customer's satisfaction.

Ambition

We aim to provide safe products of an agreed quality, on time, every time.

All our products meet relevant standards and are managed in line with our Product Safety Management systems. Some products also meet certified environmental or sustainability standards such as Organic, Fairtrade, Bonsucro, MarinTrust, ISCC, Rainforest Alliance, or 4C.

Principles

Together with our suppliers and customers, we are committed to responsible sourcing of the products we trade and to preserving and improving the supply chains in which we operate.

Priorities

Our commodity trading activities focus on the following priorities:

Priority 1 - Deliver safe products of agreed quality

We ensure our products meet agreed customer quality requirements, are safe, meet legal requirements and are fit for their intended use.

We achieve this by:

- complying with all relevant feed and food-safety laws in the countries where our products are produced and sold
- having quality and Product Safety Management systems in place, in line with our company policy
- continuously supporting quality control and safety of our products
- driving quality assurance through investigating and acting on customer complaints

Priority 2 - Intensive co-operation and long-lasting partnerships with suppliers

We co-operate and maintain long-lasting relationships with our suppliers to improve sustainability performance.

We do this by:

- promoting sustainable supply chains
- requesting suppliers to confirm their adherence to our Supplier Code of Conduct
- selectively evaluating suppliers' ethical and environmental performance

Priority 3 - Promote the use of sustainable products

We use our influence to promote sustainable products by:

- extending our supply chains of certified sustainable products by taking part in a wide variety of sustainability programmes, multi-stakeholder initiatives and local networks
- establishing partnerships with customers, suppliers, governments and NGOs
- sponsoring research into the origin and composition of raw materials and processed materials in the context of certifying the sustainability of products

Priority 4 - Elimination of forced labour, child labour and violations of the law

Violation of human rights, forced labour, human trafficking and failure to meet legal requirements are unacceptable. We aim to do business with suppliers who share our commitment to sustainability and the adherence to applicable laws.

We achieve this by:

- promoting a code of conduct for suppliers and requiring them to confirm their commitment;
- considering social, environmental and legal compliance standards, as well as price, quality and delivery, when evaluating suppliers.

Ambition

Our industrial assets ensure our priority of delivering safe products of agreed quality to our customers.

Principles

Our industrial assets are hygienic and safe working environments for our people and aim to be environmentally sustainable.

Priorities

During our operational activities we focus on the following priorities:

Priority 1 - Ensure a safe workplace

We are committed to providing a workplace that is free from known health and safety risks, and a work environment that is free from discrimination, harassment or behaviour that does not contribute to an inclusive work climate.

We do this by:

- complying with all relevant health and safety laws of the countries in which we work
- having health and safety management systems in line with company policy, and improving these systems by sharing best practices across our businesses
- carrying out health and safety checks on all our premises at least once a year, and providing support to make necessary improvements
- making sure that effective procedures are in place to respond to any emergency or crisis

Priority 2 - Environmental Stewardship

We perform our work in a way that protects the natural environment. Our work is monitored to ensure it complies with local environmental regulations and industry best practices.

Where there are no environmental regulations, or standards of environmental protection are lower than those set out in our Environmental Policy, we will comply with our Policy.

We take a precautionary approach to environmental challenges by:

- complying with all relevant environmental law of the countries in which we work
- having all necessary permits for emissions to air, releases to water and sending solid waste to landfill, and complying with the terms of those permits
- having environmental management systems in place in line with company policy
- using energy, water and other natural resources efficiently, monitoring their use and taking steps to protect soil and energy use to reduce our CO₂ emissions
- identifying all waste created on our premises and reducing the amount of dangerous or non-recyclable waste we generate

Priority 3 - Manage change

Significant changes which affect the operation of our assets, such as equipment, products, procedures or activities are assessed for their impact on hygiene, the environment, health and safety, food safety and continued compliance with applicable legislation.

Ambition

Our Group's success depends on having talented colleagues. We are committed to providing a healthy, safe and supportive work environment where people like to work. We also aim to ensure that our employees share our commitment to our organisational culture, values and goals.

Principles

We aim to have a culture where open communication allows employees to work together effectively. We strive to provide opportunities for our employees to develop their skills and to advance their career. We recognise that our people make a decisive difference to our collective performance and global competitiveness.

Equity, Diversity, and Inclusion

We are committed to fostering and maintaining a workplace culture that values and celebrates diversity, promotes equity, and supports inclusion. We believe that every individual has a unique perspective, experience, and contribution to make, and we are committed to creating an environment that respects and honours those differences.

Our approach to Equity, Diversity, and Inclusion (EDI) outlines our commitment to promoting equity, diversity, and inclusion in all aspects of our organization, including recruitment, training, development, promotion, retention, and workplace culture.

Priorities

Human Resources focuses on the following priorities:

Priority 1 - Communication and collaboration

We aim to develop a culture which fosters open communication.

To do this we:

- communicate business results and business updates to employees
- create opportunities for employees to freely engage with business leaders
- encourage businesses to co-operate across borders

Priority 2 - Hiring and retaining talent

We recruit the best talent available to enable our businesses to compete and succeed in the global marketplace.

To do this, we aim to:

- develop a pipeline of talent
- regularly review contingency plans for roles critical to business success
- recruit and develop leaders and managers with potential
- actively support employees to develop their skills and experience

Priority 3 - Performance management and reward

We aim to make the most of individual employee capabilities and to contribute to business results by:

- rewarding people on the basis of their performance and market practice
- communicating clear performance expectations
- giving regular feedback on individual performance

Priority 4 - Team engagement

We aim to achieve high levels of employee engagement by:

- communicating company goals and making sure individual employees understand how they can contribute to achieving them
- giving employees the opportunity to contribute their feedback and ideas
- providing safe, healthy and pleasant working environments
- treating employees with respect and dignity
- creating an open culture of co-operation where employees are supported to succeed

Ambition

We provide transparent information about our products and services, the performance of the company and the role we play in the environment and communities in which we operate.

Principles

We record business transactions accurately and in line with relevant laws, accepted accounting principles and our financial policies and procedures.

Priorities

Our communication and information activities focus on the following priorities:

Priority 1 - Transparency

We aim to communicate openly with customers, business partners and other interested parties.

We will be honest in our advertising and labelling, and communicate clearly in our documents, contracts and terms.

Priority 2 - Reporting on performance

We report on our activities, performance and results, including sustainability, to relevant parties internally and externally.

We publish audited annual financial reports to employees and stakeholders.

We produce an annual report following GRI standards to provide information about sustainability activities, including our performance in areas such as the environment, energy, water, health and safety, product safety, legal requirements and responsible sourcing.

Priority 3 - Employee communications

We provide our employees with information on our business results, projects, employee achievements and sustainability activities.

We do this through a variety of communication channels that encourage dialogue and the ability to gather employee feedback, opinions and concerns.

We have recently revised the ED&F Man Commodities website as well as individual business unit websites in order to provide more relevant information. We have also appointed a Group resource to better communicate our sustainability stories through relevant channels such as email, our website and newsletters.

We support local projects and encourage our employees to volunteer on projects that improve access to education, health, culture and emergency aid. Whether that means building schools, funding healthcare facilities, providing support and education to encourage sustainable farming or improving local community housing, contributing to society is a mutual benefit.

Being both a global and a local company, we work with partners and suppliers to support the communities we operate in and improve the welfare of local people. Our targeted impact and charitable projects focus on education, healthcare, and sustainable agriculture and we promote a culture of employee volunteering. One of the core pillars of our sustainability strategy is 'improving lives' of which implementing targeted impact projects is a key focus area.

Details on our impact projects and charitable activities can be found [here](#).

Corporate philanthropy

We support charitable projects in the communities in which we work and aim to make positive contributions to people's lives.

We do this by:

- donating charitable funds which are administered by the Group's charitable donations committee (Charico)
- maintaining the Group's relief fund for collecting and managing donations to communities who need help following natural disasters
- encouraging employee donations through company matching and employee volunteering