

CODE OF CONDUCT



SUCAFINA



AUTHOR/ISSUING DEPARTMENT:

Compliance Department

TO:

All employees of the Sucafina Group

VALIDATION:

Board of Directors of Sucafina Holding

COMPANY REGULATIONS:

All of the Sucafina Group's principles, policies and internal regulations is available on Sharepoint.

LAST UPDATED:

February 2025

TABLE OF CONTENTS

MESSAGE FROM THE BOARD OF DIRECTORS	4	3.3. Diversity and Equal Opportunities	10
OUR VISION, VALUES, AND PURPOSE	5-7	3.4. Training and Skills	10
1. COMPLIANCE WITH LAWS, REGULATIONS, ETHICS AND INTEGRITY PRINCIPLES	8	4. RAISING QUESTIONS, AND CONCERNS / WHISTLEBLOWING	11
1.1. Compliance, Monitoring, Reporting on the Code of Conduct and Internal Regulations	8	4.1. Grievance Mechanism	11
1.2. Consequences of Code of Conduct Violations	8	4.2. Whistleblowing Mechanism	11
1.3. Amendments	8	5. PROTECTION OF INFORMATION, DATA, ASSETS AND INTERESTS	12
2. CONDUCTING OUR BUSINESS WITH INTEGRITY	9	5.1 IT Security	12
2.1. Bribes and Corruption	9	5.2. Suppliers' and Third Parties' Information	12
2.2. Gifts and Entertainment	9	5.3. Employee Information and Data Protection	12
2.3. Anti-Money Laundering	9	6. PROTECTION OF THE ENVIRONMENT	13
2.4. Sanctions and Embargoes	9	6.1. Environmental Stewardship	13
2.5. Tax Obligations	9	6.2. Biodiversity	13
2.6. Conflicts of Interest	9	7. RISK MANAGEMENT	13
2.7. Fair Dealing	9		
3. TREATING OUR PEOPLE WITH RESPECT	10		
3.1. Compliance with International Labor Practices	10		
3.2. Health and Safety	10		

MESSAGE FROM THE BOARD OF DIRECTORS

The Sucafina Group (also designated as “the Group” or as “Sucafina”) is one of the world’s leading coffee merchants, and sources coffee from most producing countries. Our vision is: Be the leading sustainable Farm to Roaster coffee company in the world.

The Sucafina Group has always acted in the belief that conducting its operations with integrity and transparency, as well as with respect for the laws, for the universal human rights and in the interests of its employees and of the communities where it operates, is a pillar for long-term success.

This Code of Conduct (CC) outlines our shared values and serves as a framework directive to assist us in making sound decisions and to illustrate appropriate actions for conducting business. This CC provides guidance for ensuring best practice. We trust everyone will also apply common sense in situations that this document does not cover and seeks for advice within the organization.

Driven by our vision and values, this CC is intended to provide assistance and guidelines to all of us for achieving the highest standards and ethical conduct, thus enabling an appropriate and high-performing working

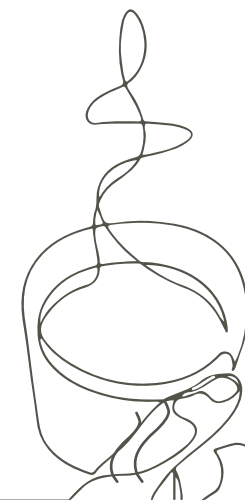
environment. What matters is not just the results we achieve, but also how we achieve them.

This CC applies to the Board Members, the Management and the Staff of the entire Sucafina Group, as well as when relevant and feasible, to its partners, suppliers and consultants when acting on behalf of Sucafina.

We welcome your comments and feedback.

Sincerely,

On behalf of the Sucafina Holding Board of Directors



OUR VISION, PURPOSE, AND VALUES

At Sucafina, we are proud to be one of the leaders in the coffee industry. We have:



A clear vision:

**Be the leading sustainable Farm to
Roaster coffee company in the world**





A well-defined purpose:
Create opportunities to improve lives



And a values-driven global team:



1. COMPLIANCE WITH LAWS, REGULATIONS, ETHICS AND INTEGRITY PRINCIPLES

The Sucafina Group operates in different countries and strives to comply with the local laws and regulations in every country it operates in, as well as to conducting its operations ethically. Based on the Group's development and needs, various policies and procedures (hereafter "internal regulations") are issued to implement such laws and regulations and assign responsibilities. Employees are expected to know, understand, and apply the internal regulations.

1.1. COMPLIANCE, MONITORING AND REPORTING ON THE CODE OF CONDUCT AND INTERNAL REGULATIONS

The Sucafina Board of Directors is responsible for ensuring the guidelines of this CC and internal regulations are communicated to, and understood and observed by, all employees.

Reporting misconduct: It is the responsibility of every employee to report any fraudulent or illegal activity and any violation of this CC or internal or external regulations. To report a potential CC or internal or external regulations' violation, a grievance and whistleblowing mechanism is in place (see [title 4](#) raising questions, and concerns and making whistleblowing reports).

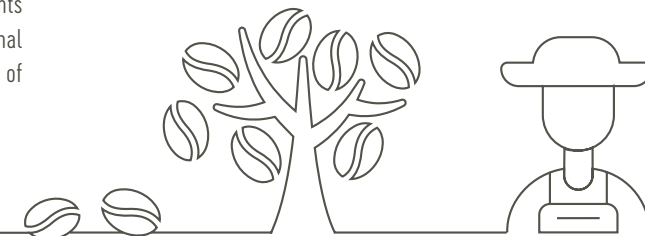
1.2. CONSEQUENCES OF CODE OF CONDUCT VIOLATIONS

By working for Sucafina, employees commit to upholding our CC. Employees violating this CC or related Company requirements shall be subject to disciplinary action

It is the responsibility of the management to take disciplinary measures appropriate to circumstances and in line with Sucafina's internal regulations and with the laws and regulations of the country the violation has taken place.

1.3. AMENDMENTS

Sucafina ensures the regular follow-up of legal and regulatory developments regarding its field of activity and regularly updates this CC and its internal regulations accordingly. This CC is owned and maintained by the Board of Directors of Sucafina Holding.



2. CONDUCTING OUR BUSINESS WITH INTEGRITY

Sucafina conducts its operations with expertise, integrity, and respect for the human rights and the interests of its employees.

2.1. BRIBES AND CORRUPTION

Sucafina complies with the anti-corruption and anti-bribery laws in every country in which it operates. It follows international best practice in this regard.

Sucafina employees do not offer or accept bribes, kickbacks or other corrupt payments, regardless of local practice or perceived customs. Bribery is illegal and it can cripple Sucafina's long-standing reputation of conducting business with integrity.

2.2. GIFTS AND ENTERTAINMENT

Sucafina is committed to the avoidance of corrupt practices in all its commercial and business dealings. Employees may only accept symbolic gifts and may not engage in offering a gift if it may be perceived as a means of influencing. Great caution should always be applied when accepting or offering any gift or entertainment in any circumstances. For the avoidance of doubt, further details can be found in the relevant internal policy document.

2.3. ANTI-MONEY LAUNDERING

Sucafina is committed to high standards of anti-money laundering compliance and to following all applicable laws and regulations to ensure that its business is not used to facilitate money laundering.

Therefore, Sucafina endeavors to take necessary steps to apply appropriate due diligence in its activity, in particular in the assessment of its Agents and in the selection of its counterparties.

2.4. SANCTIONS AND EMBARGOES

Sucafina applies without territorial limitation, the duties and restrictions imposed by the sanctions and embargoes regulations issued by the United Nations, Switzerland, the European Union, the United Kingdom, and the United States of America.

2.5. TAX OBLIGATION

In the countries where it operates, Sucafina is committed to full compliance with statutory obligations regarding disclosure and reporting to the competent tax authorities.

2.6. CONFLICT OF INTEREST

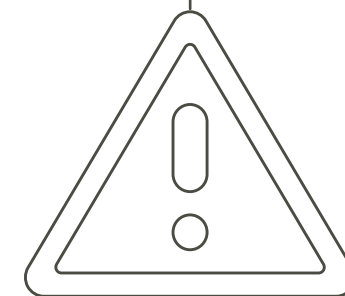
Employees must, in all transactions, avoid potential conflicts between any personal or family interests and those of Sucafina. Any such interests, including directorships, ownerships or significant shareholdings in any public or private company must be reported to, and authorized, by Sucafina.

Employees must not engage or invest in any business which is the same as, or in competition with, Sucafina's business nor in any activity prejudicial to the interests of Sucafina. If a conflict of interest arises, the employee must immediately inform their direct manager or the HR team.

2.7. FAIR DEALING

Sucafina does not use unethical business practices to acquire any unethical benefits. It is strictly forbidden for our employees to gain unfair benefits from anyone through wrongdoing, abuse of privileged position and/or information, or any unfair practice that is not in line with competition law.

Sucafina applies the same rules and diligence to protect the confidentiality and the ownership rights of intellectual property shared by its partners in the course of transactions as it would apply to its own.



3. TREATING OUR PEOPLE WITH RESPECT

Sucafina strives to provide a safe and healthy working environment for its employees and stakeholders modelled on the IFC Performance Standards on Environmental and Social Sustainability. Sucafina fully supports the Swiss commodity sector guidance on implementing the UN Guiding Principles on Business and Human Rights. As part of its duties, the Board asked the Management to establish an Environmental and Social Management System (ESMS) with the appropriate structure, documentation, and support to implement the following principles.

3.1. COMPLIANCE WITH INTERNATIONAL LABOR PRACTICES

Sucafina ensures that:

- Every company of the Group respects Human Rights and, at the scale of its business, supports global efforts to protect them.
- The use of forced labor, illegal labor, abusive labor, or child labor is not tolerated in any of our facilities, operations, or premises.

3.2. HEALTH AND SAFETY

Sucafina follows employment's laws and regulations of any country it interacts with, including rules about the employment of minors, and supports equal rights and the elimination of any form of discrimination. Sucafina, therefore, will ensure that:

- Health and safety management systems are in place and fully documented.
- All managers and employees comply with health and safety policies and procedures at all times and educate peers and subordinates on them.

3.3. DIVERSITY AND EQUAL OPPORTUNITIES

Sucafina embraces diversity and inclusion while providing equal opportunities at all stages regardless of race, color, nationality, religion, tribe, gender, age, marital status, citizenship, disability or sexual orientation.

3.4. TRAINING AND SKILLS

Appropriate internal training is provided to help staff better understand the operational, environmental and social risks that could be associated with our products and services. We provide our employees with the support to acquire the needed skills.



4. RAISING QUESTIONS, CONCERNS / WHISTLEBLOWING

To help maintain the Group's high standards regarding compliance with laws and regulations as well as integrity and ethics principles, we encourage all employees and other stakeholders to speak up. If anyone wishes to raise a concern, Sucafina favors a transparent and direct "open door" communication approach. However, Speak Up, Sucafina's grievance and whistleblowing mechanism, has been implemented to allow all stakeholders to raise concerns with the option to do so anonymously.

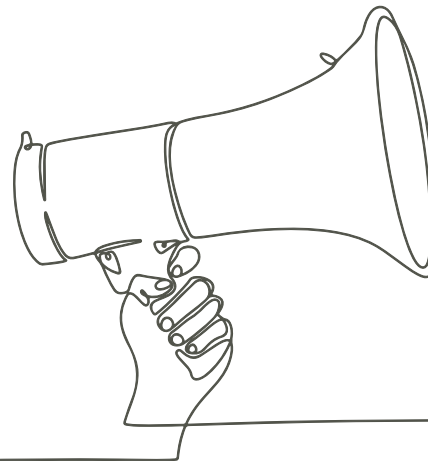
4.1. GRIEVANCE MECHANISM

Sucafina applies a grievance mechanism for handling complaints of all employees. Complaints raised by individuals or community groups in connection with the activities of Sucafina and its contractors can also be submitted through the Speak Up grievance mechanism.

4.2. WHISTLEBLOWING MECHANISM

Whistleblowing is a specific process within Speak Up that allows employees to file a report when Sucafina (or an agent or subcontractor of Sucafina) breaches or could breach local or international laws or Sucafina's Code of Conduct. The concern has to be of public interest. The process allows adequate protection of any whistleblower who acts in good faith.

To submit a grievance or "whistleblowing" report simply go to the "[contact](#)" page on the group.sucafina.com homepage.



5. PROTECTION OF INFORMATION, DATA, ASSETS AND INTERESTS

Every Sucafina employee acts in accordance with the terms of the Confidentiality Agreement he/she has signed.

5.1. IT SECURITY

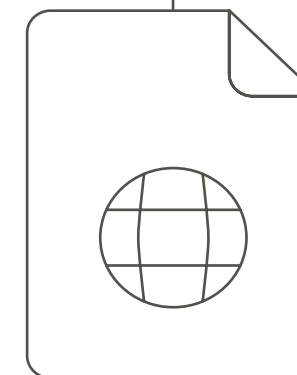
Sucafina has put in place an internal IT Policy that protects Sucafina's information.

5.2. SUPPLIERS' AND THIRD PARTIES' INFORMATION

Sucafina is committed to protecting its customers', suppliers', and other partners' data and intellectual property as diligently as it protects its own. We safeguard information in a manner that complies with all applicable laws.

5.3. EMPLOYEE INFORMATION AND DATA PROTECTION

All data collected, processed or held in personnel files and all personal information about employees hired on a permanent basis as well as on temporary basis will be treated with confidentiality. Sucafina fully complies with the data protection regulation applicable in the countries where it operates, including the European Union General Data Protection Regulation ("GDPR").



6. PROTECTION OF THE ENVIRONMENT

6.1. ENVIRONMENTAL STEWARDSHIP

Sucafina is committed to the continuous improvement of its social and environmental impact. As a global company, upholding our family spirit, we aspire to encourage a better living environment for future generations. We are committed to reducing our environmental footprint, promoting environmental stewardship, improving environmental performance across all of our business activities as well as throughout our supply chain, and to being resource efficient. To address its material topics, Sucafina will focus on three main activities over the next decade: reducing carbon emissions, improving resource efficiency, and fighting deforestation

6.2. BIODIVERSITY

Sucafina engages with stakeholders and NGOs on the ways to protect biodiversity in countries we source coffee.



7. RISK MANAGEMENT

Sucafina conducts its operations in accordance with internationally accepted principles of good corporate governance. We map and categorize risks arising from our activities, such as legal, regulatory, reputational and operational risks. We take decisions applying a risk-based approach and have an appropriate allocation of resources in order to mitigate risk adequately.

Risk management ensures an effective monitoring of risks and enables a set up where preventive measures and appropriate actions are taken to protect our people as well as our reputation and assets.





SUCAFINA

www.sucafina.com