

ENVIRONMENTAL & SOCIAL  
MANAGEMENT SYSTEM



**SUCAFINA**

Environmental and Social Management System (ESMS)

MANUAL

ENVIRONMENTAL & SOCIAL  
MANAGEMENT SYSTEM

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**About the ESMS Manual**

This manual provides practical guidance for many situations. But no single document can anticipate every situation or outline every requirement. This manual, therefore, shows how to make sound decisions and illustrates proper actions for conducting business in Sucafina. The manual will be used together with the policy documents referenced herein.

**Definitions**

ESMS: Environmental and social management system which includes Respect for Human Rights and Health and Safety at Sucafina.

ESAP: Environmental and social Action Plan, defined and monitored with our partner FMO.

EHS: Environment, health and Safety

Is: currently in practice but not regulatory

Will: indicates futurity but not regulatory nature

Shall: mandatory requirement

## ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM

### Introduction from the CEO

Established in 1977 by Abdallah Tamari in Geneva, Sucafina is one of the leading coffee merchants in the world, and sources coffee from most producing countries.

Sucafina's vision is: ***To Be the leading "Sustainable Farm to Roaster" coffee company in the world.***

***Our*** is purpose is to "Create opportunities for people to improve lives".

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.

The Code of Conduct (CC) issued by the Board of Directors outlines our shared values and serves as a general set of policies to assist us to make sound decisions and to illustrate proper actions for conducting business. This Code provides guidance for doing the right thing. We trust everyone will also apply common sense in situations that this document does not cover and seek for advice within the organization.

We are a **people business**, and **people are the main asset of our success**. We are all moved by a set of core values:

- **Entrepreneurship:** see challenges as opportunities to be profitable.
- **Expertise:** know your job, be brilliant in execution, and strive to learn continuously.
- **Passion:** make your work challenging and fun.
- **Humility:** treat colleagues and customers as if they were part of your family.
- **Integrity:** always deal fairly and honestly.
- **Adaptability:** be quick and reactive to change.

Moved by our Vision and Values, the CC is intended to provide assistance and guidelines to all of us for achieving high standards and ethical conduct, thus enabling an appropriate and well-performing work environment. What matters is not just the results we achieve, but also how we achieve them.

The CC applies to Board Members, Management and the Staff of the entire Sucafina Group. We also have a supplier code of conduct which is relevant to our partners, suppliers, and consultants when acting on behalf of Sucafina.

As directed by the CC and the Supplier code of conduct, I have established an Environmental and Social Management System (ESMS) structure and manual to reach our goals. I encourage you to get familiar with both as they are tied into everything we do. Per the board of director's instructions, this ESMS will apply to all companies in the Group.

I welcome your comments and feedback.

Sincerely,

*Nicolas A. Tamari*  
*CEO, Sucafina SA*

# ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM

## 1.0 INTRODUCTION TO THE ESMS MANUAL

### 1.1 Purpose

The purpose of this manual is to define the ESMS of Sucafina Group and provide guidance and direction for the implementation of the ESMS to all personnel, including all relevant documents. The manual contains:

- ❖ Description of Sucafina ESMS
- ❖ Definition of roles & responsibilities, escalation, and the interrelationships of the key operating management segments.
- ❖ Identification of resources and training allocated to management, performance of work and verification activities including internal audit.
- ❖ Direction for each of the functional activities.
- ❖ Controls that ensure the requirements will be met.

The manual enables some of the key components of our Sustainability Framework. It comprises the:

- **ESMS** - which is a set of specific requirements, standards, and procedures necessary to the ongoing identification, assessment and monitoring risks and impacts of our business and operations.
- **ESAP** - the transformation roadmap we are using to close the gaps to IFC performance Standards, *defined and monitored by FMO*.
- **EHS Roadmap** – The guidance document that defines our objectives in terms of attaining World class status on EHS - HUMAN RIGHTS .

### 1.2 Scope

This manual applies to all our operations across the globe. The ESMS is designed to cover Environmental and Social impacts, including the respect of Human Rights, which our operations can control and directly manage, and set rules on those Sucafina does not control or directly manage but can be expected to have an influence.

### 1.3 References

- ❖ Sucafina EHS Policy
- ❖ Human Rights and Labor procedure
- ❖ Sucafina Code of Conduct.
- ❖ Supplier Code of Conduct
- ❖ Sucafina Sustainability Strategy
- ❖ Going forward BRC for Trade Houses.
- ❖ IFC guidelines on ESMS.

### 1.4 Issue and Update

The revision of this Manual is in accordance with the Document Control Procedure.

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## 2.0 COMMITMENT AND RESPONSIBILITY

### 2.1 Organizational Overview

At the direction of the Board of Directors, the CEO has established the following structure to implement the ESMS.



### 2.2 Resources, Roles, Responsibility, and Authority

Specific roles, responsibility, and authority are defined as follows:

#### 2.2.1 CEO and the Board

The CEO and the Board are responsible for giving the overall direction of the ESMS and providing adequate resources for implementing and maintaining the system on a strategic basis.

#### 2.2.2 Group ESMS Committee

This committee is responsible for:

- a) The establishment and implementation of the ESMS at the Group level
- b) The establishment & review of Group objectives, targets, and programs
- c) Ensuring the effective implementation of EHS - HUMAN RIGHTS and social-related controls and measures
- d) The internal communication of EHS - HUMAN RIGHTS matters to employees; promoting awareness among organization staff
- e) The review of complaint records, non-conformity, corrective action and preventive action reports and the adoption of preventive actions as necessary
- f) Providing leadership on EHS - HUMAN RIGHTS and social issues
- g) Meet as needed but no less than once a year preferably every quarter.
- h) Oversee and approve the publication of an annual monitoring report

#### 2.2.3 Head of Sustainability

The Sustainability Manager is responsible for administering the system on a day-to-day basis, including the following specific duties:

- a) Making recommendations to the Group ESMS Committee on EHS - HUMAN RIGHTS and social matters

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- b) Ensuring the guidance of the board, CEO, and Group ESMS Committee is implemented through the ESMS
- c) Ensuring the ESMS is moving the Group toward attaining the Sustainability strategy, to World class status as per the roadmap and certification of relevant standards at the desired pace and per commitments to our partners
- d) Reporting on the performance of the ESMS to the Group ESMS Committee for review and to provide a basis for improvement of the system
- e) Raising Staff Awareness
- f) Ensuring that objectives and targets are being monitored, as well as compiling them and identifying trends, and acting as the secretary of the Group ESMS Committee
- g) Draft an Annual Monitoring Report for Group ESMS Committee approval

### 2.2.4 Country Managing Directors

The Country Manager is responsible for:

- a) The establishment and implementation of the ESMS at country level, to include training requirements for employees
- b) Ensuring the health and safety of all employees including casuals, suppliers and contractors at our premise
- c) The internal communication of EHS - HUMAN RIGHTS and social matters between management and employees; and promoting awareness among organization staff
- d) Providing leadership in the pursuit of EHS - HUMAN RIGHTS issues
- e) Ensuring all departments document their activities in the form of Operating Procedures derived from the Group policies and procedures
- f) Reporting on the progress of implementation of the ESMS in their business units during annual budget and strategy meetings

### 2.2.5 Regional EHS - HUMAN RIGHTS Managers

- a) The Regional EHS - HUMAN RIGHTS Manager reports to the Group Sustainability Manager and works with the country ESMS committees and EHS - HUMAN RIGHTS Coordinators to ensure full compliance to the Group ESMS requirements at all times.
- b) Supports each country in identifying EHS - HUMAN RIGHTS risks
- c) Designs actions to close any identified gaps, including training, education sessions and formulation of policies.
- d) Creates an appropriate calendar of annual EHS - HUMAN RIGHTS trainings for each country
- e) Builds the capacity of local ESMS committee and coordinators to manage EHS - HUMAN RIGHTS risk
- f) Proposes updates to the ESMS manual
- g) Creates periodic reports for the Sustainability Manager on EHS - HUMAN RIGHTS matters
- h) Supports the Group Sustainability Manager to design and implement short and long term EHS - HUMAN RIGHTS priorities

### 2.2.6 Country Level ESMS Committee

This committee is responsible for:

- a) The establishment and review of objectives, targets, and programs

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- b) Ensuring the effective implementation of EHS - HUMAN RIGHTS -related operational controls and programs.
- c) The review of complaint records, nonconformities, corrective action and preventive action reports, and the adoption of preventive actions as necessary
- d) Establish a structured health, safety and environment program in accordance with international standards and local requirements
- e) Any other ESMS activities that are assigned by the Country Manager
- f) Holding at a minimum regular quarterly ESMS committee meetings

### 2.2.7 Country Level Environment, Health and Safety (EHS - HUMAN RIGHTS ) Coordinators

The Country Level EHS - HUMAN RIGHTS Coordinator is responsible for:

- a) Assisting the Country Manager and Country Level ESMS Committee in implementing the ESMS within their relevant units
- b) Reporting on monitoring requirements to the Group Sustainability Manager, and acting as the secretary of the Country Level ESMS Committee

### 2.2.8 Employees

All employees are responsible for:

- a) Working in accordance with the documented procedures and instructions, specific responsibilities defined in individual procedures and instructions
- b) Reporting problems, deviations, and misconduct according to Grievance Handling Procedure.
- c) Seek out and learn the areas of the ESMS that apply to their role and function.

### 2.2.9 Our EHS - HUMAN RIGHTS Policy statement

The health and safety of each Sucafina employee is of primary importance to us. As a company, we are committed to maintaining a healthy and safe working environment. Management will provide necessary safeguards, programs, and equipment required to reduce the potential for incidents and injuries. To achieve this goal, we have developed and implemented a comprehensive Environment, Health and safety (EHS - HUMAN RIGHTS) policy, which incorporates all required components of an Injury and Illness Prevention Program, environmental protection while ensuring social issues are well managed by the company. This policy provides the commitment from Sucafina Management on how EHS - HUMAN RIGHTS issues will be addressed within the organisation. A copy of the EHS - HUMAN RIGHTS policy statement has been posted in every Sucafina office and forms part of induction trainings for all new employees, casuals and contractors.

It is the responsibility of each employee to support the policy and to perform in a manner that assures his or her own personal safety and the safety of others, including customers, visitors, and other traders. To be successful in our endeavor, all employees at every level must adopt proper attitudes towards injury, illness and pollution prevention. We must also cooperate in all health and safety matters, not only between management and employees, but also between each employee and his or her respective co-workers. Only through such an effort can any safety program be successful. Our objective is a health and safety program that will reduce the total number of injuries, negative environmental impacts and illnesses to an absolute minimum. Our ultimate goal is zero incidents.

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**Applicable procedures and documents**

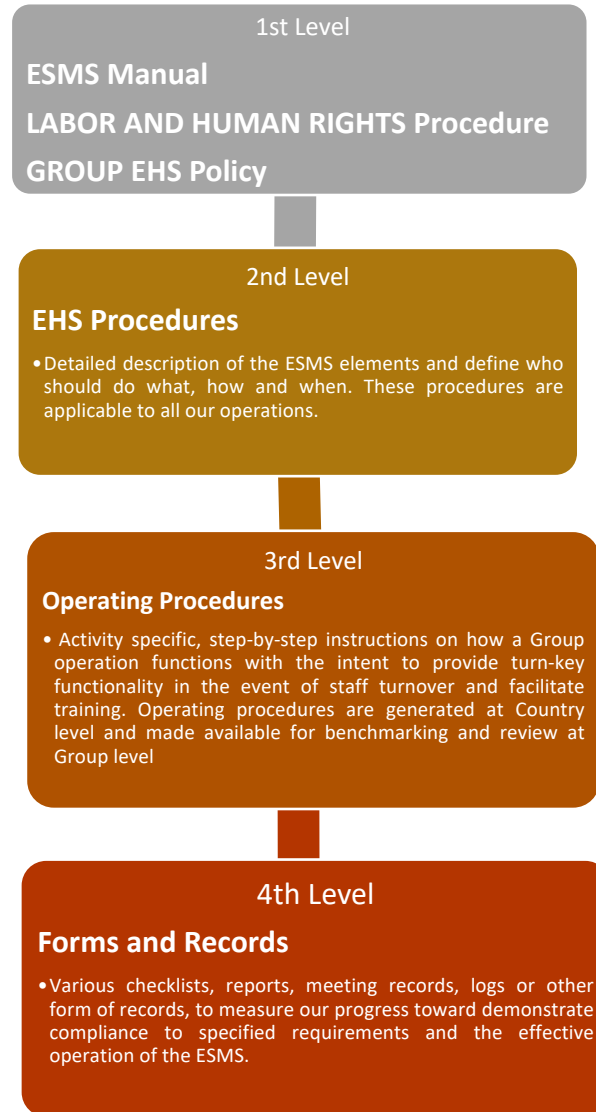
Labor and Human Rights procedure  
EHS P 005-Internal EHS Audits procedure  
EHS P 015-EHS - Communication procedure.  
EHS - P 013-Grievance Handling Procedure  
EHS - Sustainability policy v.3

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## 3.0 ESMS REQUIREMENTS

### 3.1 General Requirements

A company-wide ESMS has been established, documented implemented, continuously improved and maintained by the management of Sucafina as a means to be consistent and do the right thing. Sucafinadocuments its ESMS utilizing the following hierarchy:



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### 3.2 Character of the ESMS

The board of directors and CEO have directed that the ESMS:

- a) Be appropriate to the nature, scale, and addresses the impact of its activities, products, and services
- b) Comprise a commitment to continual improvement and prevention
- c) Be documented, implemented, maintained, and communicated to all employees and relevant stakeholders.

### 3.3 Operational cycle

We shall follow a “**plan-do-check-act**” as describe in the IFC handbook. This process will facilitate the continuous improvement of the Group and ESMS.

- **Plan:**
  - Update the country risk assessments and discuss as appropriate. Specifically:
    - Any areas in the Country or Group Risk Assessment that are evaluated as **Urgent** will be discussed at Group level within one work week, with immediate mitigating actions to be taken and a plan to reduce or mitigate the risk to **High** as soon as possible.
    - Any areas evaluated as High will be evaluated at Country level within one work month, with immediate mitigating actions to be taken and a plan to reduce or mitigate the risk to **Medium** within 4 months once submitted to the Group ESMS Committee.
    - Any areas evaluated as Medium will be evaluated at Country level, with a plan to reduce or mitigate the risk to **Low** or **None** within six months.
    - Any areas evaluated as Low or None will be monitored and maintained at Country level.
  - Review all stakeholders (customers, banks, employees, government entities) requirements and industry standards on EHS - HUMAN RIGHTS and social issues, including data from annual and event-driven local and the Group legal review
  - Review goals and objectives to ensure they are in line with the Group and Country strategy
  - Communicate revised goals and objectives to operational and trading units. Conduct small scale testing before full implementation as appropriate.
  - Assign resources as necessary to enable the accomplishment of goals and objectives assigned.
- **Do:** operational units translate the goals and objectives into specific, measurable, achievable, relevant, and time bound milestones, and implement the plan. Record data as required for each objective as necessary to evaluate progress, and report back to management during appraisals and quarterly committee reviews.
- **Check:** evaluate progress and likelihood of achieving goals and objectives per time requirements. Communicate any adjustments and request additional resources as necessary.
- **Act:** Stabilize the changes and establish continuous monitoring. If the change had a positive impact, examine whether it can be applied to other business units. If the change was negative, examine cost of reversion. Communicate and debrief any unexpected results to relevant stakeholders. Begin planning next cycle.

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**Applicable Procedures and documents**

- P 006-ESMS Committee meetings procedure.
- P 002-Records control procedure.
- P 015-Communication procedure.
- P 009-Contractor Management procedure.
- P 008-EHS - HUMAN RIGHTS Training procedure.
- Country EHS - HUMAN RIGHTS plans
- Sucafina Sustainability Strategy

**3.4 Hazard analysis and risk assessment**

Country risk assessments will be reviewed as needed based on events and program implementation, with a complete review conducted at least annually. Task based risk assessments will be conducted quarterly for existing tasks whereas contractor works will be risk assessed prior to contractor commencing work. While focused on environmental and safety issues, the risk assessment will encompass all elements related to the sustainability of our business. Task based risk assessment is applied to all activities, which have the potential to cause injury or loss. The risk assessment involves identifying the hazards present in the task and then evaluating the extent of the risks involved. This category of risk assessment can be applied to most common tasks at Sucafina.

At Sucafina, we shall use a 5x5 risk matrix (as indicated below) to rank all the risks. Every country will maintain a risk register which will be reviewed in the quarterly ESMS committee meetings. Risks will be classified as Extreme, High, Medium or low and categorized as a health, safety, environment, quality, social, security or a reputational risk.

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Medium	High	High	High	Extreme
Likely	Medium	Medium	High	Hgh	Extreme
Possible	Low	Medium	Medium	High	High
Unlikely	Low	Low	Medium	Medium	High
Rare	Extremely Low	Low	Low	Medium	Medium

Every Sucafina employee must manage risks by:

- being aware of and understanding the risks of any task they undertake
- only performing tasks in which they are competent
- following documented standards/procedures

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- wearing the specified Personal Protective Equipment and ensuring it is maintained and fits correctly
- observing safety signs and tags; and
- being on the lookout for hazards and reporting them.

Managing risks and controlling them will lead to a safe working environment for all employees.

### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 003-Hazard identification and Risk assessment procedure.

Risk Register

EHS - HUMAN RIGHTS P 015-Communication procedure.

### 3.5 Emergency Preparedness and Response

As part of the ESMS, Sucafina facilities strive to ensure that the health & safety risks and environmental impacts associated with any emergency situations are prevented or mitigated to the greatest extent possible.

A group plan has been established, derived from the country specific emergency plans that have been put in place. Trainings will be conducted to respond to risks identified by the risk assessment process defined in section 3.3 and 3.4. Country Managers will periodically direct the Country EHS - HUMAN RIGHTS Coordinator to test these plans as per local legislation requirements but at least once every year.

#### 3.5.1 Emergency Plan

An emergency plan has been developed in each country in case of emergency and is given to all workers (employees and contractors) before they begin work. Emergency Plans are shared and displayed in the sites etc. Emergency plans must also be brought to the attention of all parties who visit the workplace.

Emergency contacts are located in the safety induction handbook and are displayed in the emergency response plan and fire action instruction plan at the workplace

#### 3.5.2 First Aid

First Aid kits are available at the workplace as well as company vehicles; and are adequately stocked with relevant content as per the first aid guide. The company ensures the availability of a suitable number of appropriately trained persons to render first aid. The number of trained First-Aiders depends on the manpower and specific risks of the site. Emergency instructions describing the process to follow in case of accident (call a First-Aider, the emergency numbers to call inside and outside the organization and first-aid kits location) are written and explained to the staff by the EHS Coordinator and posted as a reminder. It is strongly recommended that first aiders receive annual refresher trainings to maintain their skills in a current status.

#### 3.5.3 Fire Safety

Sucafina regularly assesses the need for fire safety equipment including fire extinguishers, fire blankets, smoke detectors and alarms. Fire extinguishers and fire blankets must be regularly inspected and maintained in line with the schedule. All workers are to inform management when a fire extinguisher has been used or requires servicing, refilling or a smoke detector/ alarm requires a replacement battery.

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A register of fire safety equipment, their location and service history is kept by the EHS Department. The Fire Marshall Committee led by the Chairperson shall be responsible for the register and ensuring that service is done, and that the fire points are adequately distributed at the premises and serialized.

### 3.5.4 Smoking

Each employee is responsible for understanding the rules regarding smoking on each site they are working on. 'NO SMOKING' signs shall be displayed in the company premises and company vehicles to minimise ignition sources.

### 3.5.5 Hazardous Substances

Hazardous materials, are substances capable of causing harm to people, property and the environment because of their hazardous nature. The two most likely routes of exposure to a toxic chemical are by inhalation and by absorption through the intact skin. Injection (e.g., from a contaminated needle or broken glass fragment) and ingestion are also possible. Warning labels and information pertaining to the safe storage, handling and use of hazardous substances are found in the MSDS (material safety datasheets) which are availed at the chemical storage points as well as the chemical information files at the workplace in the respective departments where they are handled. Incompatible products must be kept separately to avoid accidental mixing which could generate a chemical reaction and / or flammable, explosive, toxic or corrosive products.

Flammable/combustible substances should be stored in a cool, dry place and away from sources of ignition. Flammable substances are to be stored on the premises on a need basis. Suitable fire fighting equipment should be availed where hazardous substances are kept.

### 3.5.6 Housekeeping

The Company recognizes the need for good housekeeping to ensure there is less likelihood of fire or accidental injury through clutter or rubbish, improved efficiency, production and less frustration and making the work area a more enjoyable and comfortable place to work in.

It is everyone's responsibility to ensure that:

- Machines are kept clean and maintenance routines are followed, machine guards are in place and they in good working order
- Tools are free of dirt and oil, are stored in the appropriate area after use and defects are reported
- Materials and substance are clearly labelled, stored in the designated areas and containers are secure
- Floors, aisles, access areas, platforms etc are kept clear of debris and rubbish with materials not stored where they could cause a hazard
- Personal protective equipment is kept clean and stored correctly.

*"A tidy working area is a safe working area."*

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### Applicable Procedures and documents

Group Emergency Preparedness and Response plan.  
Country specific emergency preparedness and Response plans  
EHSP 004-Incident investigation and reporting procedure

### 3.6 Document and record control

The management system documentation includes both documents and records. The extent of the management system documentation has been developed based on the following:

- a) The size of Sucafina operations
- b) Complexity and interaction of the processes
- c) Risks and opportunities
- d) Competence of personnel

Documents required for the management system are controlled in accordance with document and data control procedure. The purpose of document control is to ensure that staff have access to the latest, approved information, and to restrict the use of obsolete information. All documented procedures are established, documented, implemented and maintained.

A records control procedure been established to define the controls needed for the identification, storage, retrieval, protection, retention time, and disposition of quality records. This procedure also defines the methods for controlling records that are created by and/or retained by suppliers.

These controls are applicable to those records which provide evidence of conformance to requirements; this may be evidence of Product or Service requirements, contractual requirements, procedural requirements, or statutory/regulatory compliance. In addition, quality records include any records which provide evidence of the effective operation of the management system.

### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 001-Document Control Procedure  
EHS - HUMAN RIGHTS P 002-Records Control procedure.

### 3.7 Contractor management

All contractors engaged will be guided by the contractor management procedure. Contractors will be selected based on their competency, their EHS - HUMAN RIGHTS previous record and also based on the management system they have implemented at their respective organization. All contractors before commencement of work will be inducted to Sucafina site specific requirements. Contractors in conjunction with the EHS - HUMAN RIGHTS coordinators will carry out a risk assessment for the tasks at hand and ensure the outcome of the process communicated to all involved parties. Permits to work will be issued for all contractor works.

### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 009-Contractor Management Procedure  
Induction form  
EHS - HUMAN RIGHTS P 003-Hazard identification and risk assessment procedure  
Supplier code of conduct  
Permit to work procedure.

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### 3.8 Supplier management

Sucafina currently works with many suppliers of coffee. These suppliers can be categorized as small or large farmers, farmer groups or intermediaries. All can be one-off or frequent suppliers to our business. Some suppliers may be deemed strategic if they conduct a majority of their business with Sucafina on a regular basis. The categorisation of suppliers is important for determining the level of responsibility of the parties. We will strive wherever possible to communicate our code of conduct all the suppliers. The supplier code of conduct will be strategically posted in all Sucafina offices and copies printed at the back of the sales documentation. For the strategic suppliers, Sucafina will provide them with a self-assessment/evaluation checklist which will be used to profile the suppliers based on risk level. Suppliers classified as high and medium risk will be subjected to an audit process to evaluate their ESMS processes with aim of helping them improve on their standards. The audit can be desktop or a physical audit depending on their compliance level and the supplier volume. A remedial action will be discussed with the supplier management should there be repetitive cases of non-compliance on the code of conduct. For cases where the supplier's non-compliance puts Sucafina's reputation at risk, the cases will be forwarded to the Group ESMS committee for decision making which might include termination of the supplier contract. For intermediaries like cooperative societies, Sucafina will use the certifications attained as an assurance of complia

#### Applicable Procedures and documents

Supplier code of conduct

Human rights policy

### 3.9 Incident Investigation and reporting

The supervisor, manager, or other designated individuals will investigate all work-related incidents in a timely manner. This includes minor incidents and "near loss incidents," as well as serious injuries. An incident is defined as any unexpected occurrence that results in injury to personnel, damage to equipment, facilities, material, or interruption of normal operations.

The Country Manager and local ESMS Committee members must be alerted as soon as an incident occurs in order to ensure an appropriate local response and coordination.

The Group Sustainability Manager should be alerted immediately in the case of any incident leading to serious bodily injury, death, material damage to company assets, an environmental disaster and/or reputational risk for the company or its stakeholders including but not limited to customers, financial partners, and regulators.

Depending on the severity and materiality of the incident the Group Sustainability Manager will immediately inform the Group ESMS Committee and company CEO.

Immediately upon being notified of an incident, the supervisor, manager, or other designated individual shall conduct an investigation. The purpose of the investigation is to determine the cause of the incident and corrective action to prevent future re-occurrence; not to fix blame or find fault. An unbiased approach is necessary in order to obtain objective findings.

The Purpose of Incident Investigations includes;

- To prevent or decrease the likelihood of similar incidents.

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- To identify and correct unsafe work practices and physical hazards. Incidents are often caused by a combination of these two factors.
- To identify training needs. This makes training more effective by focusing on factors that are most likely to cause incidents.

All incidents will be reported and investigated as per the incident investigations guideline. The EHS - HUMAN RIGHTS coordinator will determine the incident level as defined in the guideline.

### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 004-Incident Investigation and reporting procedure

### 3.10 Safe systems of Work

A Safe System of Work describes the:

1. requirements for how work can be carried out at an acceptable level of risk by the elimination or control of hazards; and
2. management processes to ensure these requirements are implemented and sustained

A Safe System of Work ensures that those who conduct, or are affected by the work, are aware of the hazards and controls.

A Safe System of Work, if correctly implemented and complied with, benefits Sucafina by avoiding or minimising: harm to people, the environment and property and the costs of incidents.

Components of the safe systems of work applied at Sucafina includes; induction training, workplace inspections, permit to work system, site safety rules, management of change, personal protective equipment, manual handling energy control and lock out tag out.

#### 3.10.1 Induction training

All employees are required to undergo a mandatory EHS - HUMAN RIGHTS induction upon joining the organisation. EHS - HUMAN RIGHTS Induction training will also be conducted for all contractors, casuals, suppliers and visitors staying for more than 2 hours at site. The Site Management are responsible for:

1. Customising the EHS - HUMAN RIGHTS induction documents to include site specific EHS - HUMAN RIGHTS rules and information
2. Ensuring that site specific induction documents are available and up to date
3. Ensuring that all Employees, Contractors, Sub-contractors and Visitors (including Employees who are not based on the site) are inducted prior to any work commencing
4. Ensuring records of induction are kept

#### 3.10.2 Workplace Inspections

Workplace inspections will be conducted at a minimum using the checklist developed. The EHS - HUMAN RIGHTS coordinator is expected to conduct a weekly inspection of the workplace whereas the ESMS committee members are expected to conduct at least one inspection every month. Results of the inspections will be shared with the area owner and corrective measures taken to the risks identified from the inspection. A follow up inspection will be conducted to ensure all areas of non-deficiencies are closed out effectively. The output of these inspections will be discussed in the ESMS committee meetings. All inspection checklists will be tracked and filed by the country EHS - HUMAN RIGHTS coordinator.

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### 3.10.3 Permit to Work System

A Permit to Work system is a formal management process intended to:

1. Ensure that hazards are identified prior to work commencing
2. Confirm that adequate controls are in place to achieve an acceptable level of risk (Note: this needs to be done with reference to applicable standards and risk assessment)
3. Provide authorisation for the work

The Permit to Work system involves significant input from a responsible person of Sucafina (the 'Permit Issuer') and the person responsible for executing the work (the 'Permit Acceptor', who may be a contractor employee).

At minimum, permits will be issued for Working at height (2 metres or more above a safe lower level), except for construction or disassembly of scaffolding where regulations and specialist procedures describe appropriate safety controls, working above water with a risk of drowning, opening/creating and entering a confined space excavation work deeper than 1.2 m (4 ft) and/or close to buried services, hot work, where there is a risk of fire, unless conducted in a suitable designated 'Fire Safe' area, e.g. maintenance shop or welding demonstration area (Note: 'hot work' applies to work that involves heat, sparks or flames, e.g. grinding, welding, soldering, brazing, melting or flame cutting), lifting and use of mobile cranes, except for: places where lifting is regularly performed following agreed procedures, e.g. a fabrication factory, or a major construction site where necessary controls and procedures have been implemented and are being managed according to an agreed project safety plan, modifications to and/or pressure testing of high pressure lines, working on systems with energy (including pneumatics, hydraulics, electrical, thermal, mechanical or flammable substances), working on systems with hazardous chemicals, work on live electrical systems or equipment, work in flammable zones involving the use of non-approved electrical equipment or any activity that could introduce an ignition source, hazardous engineering development work, work near rail tracks during railway operations or adjacent to roadways, engineering modification or changes at operational plants including tie-ins to live processes and/or systems, Construction projects (in accordance with individual project safety plans) and involving hazardous irregular construction work, working close to high-voltage power transmission lines (less than 5 metres overhead), Felling trees, Working with explosives (e.g. demolition work), working with ionising radiation (e.g. non-destructive testing).

### 3.10.4 Site Safety rules

All Sucafina sites will have EHS - HUMAN RIGHTS rules that will be complied to by everyone entering the sites. The rules will form part of the induction process. Any violation of the rule will result to consequence management based on the site procedures.

### 3.10.5 Management of Change

All changes that might have an impact on EHS - HUMAN RIGHTS will need to be managed effectively such that the risks associated with the change do not get out of hand. Prior to any change being effected, management will conduct a risk assessment based on the proposed change and ensure all the controls required are put in place before the change is effected. A change register will be established to document all safety critical changes within the plant.

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### 3.10.6 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) is equipment used or worn to protect the body from potential hazards. PPE includes a wide range of clothing and safety equipment including safety shoes, face masks, hard hats, protective overalls, hearing protection, respirators, gloves, safety glasses, safety harnesses, etc.

The need for PPE is generally identified as an outcome of general risk assessment processes. It may also be identified as an outcome of the Permit to Work process. It is recommended that risk assessments are conducted by a team which includes a selection of operators (those who may be required to use the PPE) to help ensure that practical considerations and user preferences are considered, and that PPE compliance is maximised. The PPE selected must be appropriate and chosen to reduce the overall risk effectively, i.e. if the level of residual risk is:

1. high - the PPE needs to provide a high level of protection
2. low - the PPE needs to only provide a low level of protection

The employer has a responsibility of providing PPE where the controls in place do not eliminate the workplace hazards. Employees are responsible for wearing and/or using PPE, and reporting damaged PPE. Replacement of PPE is available through standard requisition process through the line manager. Employees will be instructed and trained in the safe use of their personal protective equipment and the arrangements for maintenance, cleaning and any necessary repairs. Consultations will take place to ensure that all necessary measures to remedy recognized significant risks are reviewed.

### 3.10.7 Energy control and Lock out Tag out

Physical lockout refers to the lockout/tagout of all energy sources. The purpose of physical lockout is to ensure that personnel are protected from the inadvertent energisation, start-up or release of stored energy, as these could result in injury or danger to plant. Physical lockout is a necessary step in providing a safe system of work. Physical lockout is required for servicing and maintenance activities, and for any other work performed on equipment, machinery or plant where a work instruction or Permit to Work is issued. To achieve physical lockout locks/tags are attached to energy isolation controls. Wherever possible, lockout should be used in preference to tagout.

### 3.10.8 Manual Handling programme

Manual handling is any transporting or supporting of a load by one or more workers involving the use of muscular force (or effort) to lift, put down, move, push, pull, carry, hold or restrain an object. The human effort may be applied directly to the load or indirectly by pulling a lever. Manual handling/repetitive tasks with the potential to cause risk to health must be identified and include those identified by: general risk assessment, Review of injury, illness and sickness data, claims, reports of discomfort and ill health conditions. If the activity cannot be avoided, a focused manual handling/ergonomic risk assessment must be conducted. The focused risk assessment must be able to estimate risks to health and determine the most appropriate control measures to be implemented. The focused manual handling/repetitive work risk assessment must include consideration of the:

1. Load -Excessively heavy or too large, Unwieldy or difficult to grasp, Unstable, unbalanced or contents likely to shift and sharp, very hot or cold.
2. Task – Twisting, Stooping/bending, Poor posture, handling while seated, Excessive carrying distances, Adequate rest or recovery periods, Duration of prolonged physical effort, Repetition or repetitive movement (frequency rate), Excessive pushing or pulling of the load, Holding the load at

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a distance from the body, High risk combinations, e.g. twisting and stooping and Working at a rate imposed by the process.

3. Work environment - Poor lighting conditions, uneven, sloping, slippery/unstable floor or pathways, steps, access and egress, space constraints, variations in floor levels or workstations, heights of workstations, Extremes of temperature, humidity or air movement
4. Individual - Require unusual strength, height etc (factors beyond those normally associated with reasonably fit, healthy individuals, vulnerable/sensitive groups (physical/medical characteristics or specific medical conditions/disabilities that may be aggravated on performing specific task, e.g. back condition), pregnant workers or requires special knowledge or training for the task.

Anyone, who is involved in manual handling/repetitive work must be provided with suitable manual handling/repetitive work training such that they are competent: within the induction period for new employees/casuals, as refresher training as a minimum every 3 years and after injury/ill health incident.

### **3.10.9 Machinery Safety and Equipment Safety**

Regular and routine maintenance must be carried out on all machinery and equipment as per the preventative maintenance service schedule. Before maintenance is carried out on any machinery or equipment, it must be disengaged, machines parked and motors turned off with keys removed. If working under a raised machine or equipment, they must be supported on stands and wheels locked. All electrical tools and equipment must be turned off and unplugged. Maintenance records are kept and maintained by the Engineering/maintenance department. The Company will ensure that only approved machinery, tools and equipment will be supplied for use at work. Where any new machinery has been designed for a work purpose, the manufacturer will be made aware of all company and legislative safety requirements so that the item will be designed to function in an entirely safe manner, in compliance with OSH Regulations. All employees will be informed, instructed and trained on safe working with machinery, and given all necessary details of safety procedures and systems of work.

### **3.10.10 Lifting Operations & Equipment**

Lifting equipment for use at work will be;

- Suitable, strong and stable enough for the particular use
- Positioned and installed to minimize any risks
- Used safely i.e. the work is planned, organized and performed by competent people
- Marked with the safe working load, and if it is used for carrying people with the maximum number that can be carried
- Subject to ongoing thorough examination and where appropriate inspection by competent people

The typical risks associated with the use of lifting equipment include:

1. Mechanical hazards associated with the lifting equipment itself, such as points of shear and entrapment
2. Failures of the equipment (or of the lifting accessories, such as chains, slings, etc.) in use. These are hazards associated with the strength and stability of the lifting equipment and of the lifting accessories used with the lifting equipment

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3. Falling loads
4. Failure to manage and control the lifting operation properly (leading to crush injuries, etc.)
5. Failure to manage the use and storage of lifting accessories (leading to deterioration of equipment and to increased tripping hazards) etc.

### 3.10.11 Spill prevention and control guidelines

Spill prevention and control measures are implemented and maintained for all chemical/hazardous handling operations including; chemical loading/unloading, storage, transfer or use in process operations to minimize the effects of the spills on human health and the environment both on and off site. Employees who deal spills are identified and trained. It is important to have means of controlling spillages and releases within the storage area to prevent the uncontrolled spread of liquids. A number of control measures are possible. The site Manager should provide dry sand, absorbent granules, sealing putties and booms for containing and clearing up small spills where safe to do so. Contaminated materials are then disposed safely and appropriately by the use of a registered waste contractor. Spillages are cleaned up promptly and the material disposed safely, in accordance with regulations and site procedures, by a qualified company. Precautions against skin and eye contact, such as gloves, protective clothing and goggles are provided. Suitable respiratory protection may be needed during clean-up operations.

### 3.10.12 Storage areas

Storage areas are designated and clearly marked. The layout of the coffee storage and handling areas are carefully planned to avoid tight corners, awkwardly placed doors, pillars, uneven surfaces and changes of gradient. A storage plan is established taking account the capacity and storage modes defined by the warehouse Manager. Storage is prohibited outside the areas provided for this purpose. The fire escape route, fire equipment and fire doors should be free from obstruction all times.

### Stacking

Proper stacking of coffee and store materials (stock) in our warehouses is to be keenly observed so as not to endanger workers. Unstable stacks could collapse onto workers and cause injuries and in some cases fatalities while higher stacks that block fire equipment can pose a fire hazard.

Where pallets are used in warehouses, the Site manager ensures they are in good conditions and are laid in equal sizes in the delineated stack area to protect coffee/materials from dampness, allow ventilation, and facilitate fumigation. While storing coffee/stock in nylon/plastic bags, jute bags are to be placed in-between the lines to make a firmer stack.

The recommended maximum height of the stacks depends on the type of bags used for storage and the method of handling. When handled manually, stacks should be no more than 16 feet high, if it handled by forklift, it should be no more than 20 feet. For plastic bags (woven polythene) they should not exceed a height of 10 feet. Adequate space is left to allow workers, forklifts and other lifting devices to navigate the workplace safely and efficiently. Distance of 2ft should be left between walls and stacks, and 2ft should be left in-between stacks.

When **De-stacking** manually, the stacks are to be taken down tier by tier without 'taking bites' out of it to prevent their collapse: when using a forklift, the front block is loaded halfway first, then the next loading is supposed to be carried on from the second block behind to make the stack level to maintain support.

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### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 007-Induction Procedure

EHS - HUMAN RIGHTS P 012-Permit to work procedure

EHS - HUMAN RIGHTS P 014-Energy control and lock out tag out procedure

### 3.11 Training

Sucafina is committed to instructing all employees in the best EHS - HUMAN RIGHTS work practices. Awareness of potential hazards, environmental aspects and their impacts, social issues as well as knowledge of how to control them, is critical in maintaining a healthy and safe work environment in preventing injuries or negative impact to the society. To achieve this goal, we will provide training to each employee on general EHS - HUMAN RIGHTS issues and procedures specific to that employee's work assignment. The training needs will be determined by the results of risk assessment, results of audits, incident statistics, stakeholders requirements and our quest to attain world class status.

Every new employee will be given instruction by his or her supervisor in the general EHS - HUMAN RIGHTS requirements of their job. A training calendar will be developed and circulated every year and training completions be monitored through a tracker. Trainings will be both practical and theoretical implemented through a class based approach or online based on the needs.

Weekly toolbox talks will be conducted for all operations staff as a way of informal training. Toolbox topics will be country specific based on the challenges encountered. Records of the trainings will be maintained.

### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 008-Training Procedure

### 3.12 Internal EHS - HUMAN RIGHTS Audits

Final responsibility for the implementation of the ESMS rests with the CEO and the Country Managers. The Group and Country Level ESMS Committees are responsible for creating the structure, goals, and objectives to implement the ESMS, and the Group Sustainability Manager, Regional managers and Country EHS - HUMAN RIGHTS Coordinator's roles are to enable the implementation and provide advice.

To facilitate decision making, members of the Sustainability department as well as visiting Trading and Logistics managers may conduct spot checks on compliance with ESMS policies and procedures. This includes inspections and the analysis of the results of regular monitoring, and will be done in collaboration with the Country Manager.

Formal internal audits of the ESMS will be conducted at least once every year at the direction of the Sustainability Manager. Records shall be maintained by the Country EHS - HUMAN RIGHTS Coordinator.

Corrective and preventive actions will be undertaken in a cooperative spirit, both to resolve the nonconformity and adapt policy to the local situation when possible. The Group Sustainability Manager shall ensure any improvements and adaptations are shared across the Group.

### Applicable Procedures and documents

EHS - HUMAN RIGHTS P 005-Internal EHS - HUMAN RIGHTS audit procedure

Internal Audit checklist

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**3.13 EHS - HUMAN RIGHTS Internal and External Communications**

**3.13.1 Internal Communication**

The Country manager shall ensure all employees are informed of aspects of the ESMS relevant to their role and function. The Group Sustainability Manager shall coordinate with the Communication department to circulate news, changes, and other information relevant to all employees. Besides, communications will also be conducted during staff meetings as and when it is necessary. Sucafina welcomes anonymous notification whereby employees who wish to inform the company of workplace hazards without identifying themselves may do so by phoning or sending written notification to the Sustainability Manager or Regional EHS - HUMAN RIGHTS Manager.

**3.13.2 External communication**

External communications shall be handled by the communications department and the country Manager. Common external communications to suppliers on the company's expectations will be communicated through the supplier Code of Conduct and a public statement regarding Sucafina's position on environmental and social issues will be made available on the Sucafina Group website, as well as disseminated to stakeholders. External grievances will be handled as per the human rights policy.

**Applicable Procedures and documents**

EHS - HUMAN RIGHTS P 015-Communications procedure

**3.14 Legal and other requirements**

In order to comply with the Code of Conduct including monitoring of compliance on the supplier code of conduct, the Country EHS - HUMAN RIGHTS Coordinator will conduct an annual review of the most current national, regional, provincial, state, and local laws and any other regulatory requirements that might apply to their operations, in coordination with the Group Compliance Manager. They shall report their findings to the Country Manager and document any conflicts and their resolution.

If legal or regulatory requirements conflict with internal policy, the Country EHS - HUMAN RIGHTS Coordinator shall contact the Group Sustainability Manager to revise the internal policy or obtain a waiver as appropriate. The EHS - HUMAN RIGHTS coordinator will develop a legal register where all legal requirements applicable to Sucafina will be listed with the relevant sub clauses.

**Applicable Procedures and documents**

EHS - HUMAN RIGHTS P 002-Records control procedure.

Legal and other requirements register.

**3.15 EHS - HUMAN RIGHTS Goals and Objectives**

Every year, the Sustainability Manager will develop the Group objectives and share with the ESMS committee for approvals. The objectives will be derived from the Sustainability strategy, EHS - HUMAN RIGHTS roadmap, changes in the industry, challenges encountered in the previous year, EHS - HUMAN RIGHTS data collected (both leading and lagging), new and existing stakeholder requirements and risk assessment results. These will be translated into the country specific EHS - HUMAN RIGHTS plans that will be reviewed quarterly during the ESMS committee meetings.

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Every staff of Sucafina is expected to set at least one EHS - HUMAN RIGHTS objectives when submitting the current year goals and targets. These will be monitored during appraisal process and corrective measures taken where appropriate.

### 3.15.1 HSE Performance Reporting

Sucafina has determined a set of HSE indicators that are periodically reported by inputting all the information by the EHS Coordinators. This allows measuring the overall and individual business EHS performance.

Reporting the indicators on time and keeping the database updated is the key to measure performance and also to share this important information with stakeholders through the Company's annual CRS Report (Corporate Social Responsibility). The EHS Coordinator periodically explains to management the performance of the country EHS management system(s) with EHS specific KPI's, including recommendations for improvement. The Health and Safety Indicators include the number of:

- Fatality;
- Lost time injury;
- Medical treatment case;
- First aid case;
- Lost workdays;
- Road traffic accident;
- Environmental accident;
- HSE training hours;
- HSE meetings;
- HSE audits and inspections
- Near Miss & Undesirable Cases reported

#### Applicable Procedures and documents

EHS - HUMAN RIGHTS Roadmap  
Quarter 4 Group ESMS committee presentation and minutes  
Country EHS - HUMAN RIGHTS plans  
Individual /staff performance objectives.

### 3.16 ESMS Reporting

As an integrated part of the operations and risk management of the company, ESMS reporting will be data driven and fact based, including analysis which drives corporate decision making. Each country with operations will submit a monthly report to the regional EHS - HUMAN RIGHTS Manager in the standard Sucafina format. The report will cover lagging and leading indicators, summary of incidents for the month, achievements of previous month, challenges, plan for next month and a brief compliance report on IFC performance standards. The regional EHS - HUMAN RIGHTS Manager will compile the reports and submit to the Sustainability Manager a monthly EHS - HUMAN RIGHTS report for the region.

#### Applicable Procedures and records

End month EHS - HUMAN RIGHTS reports

### 3.17 Road safety

Sucafina has established a guideline for our staff to protect the safety of individuals operating any motor vehicle/cycle on company business. Protecting our employee drivers, their passengers, and the public is of the highest priority. The commitment of management and employees is critical to the success of this program. Clear communication of, and strict adherence to, the guidelines and procedures are essential.

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Our primary goal is to maintain a high level of safety awareness and foster responsible road use behaviour. Road safety awareness and responsible behaviour will significantly decrease the frequency of road incidents and reduce the severity of personal injuries and property damage. All persons driving company vehicle will undergo a defensive driver training.

Road users employed by Sucafina must follow the requirements outlined in this guideline. Violations of the guideline may result in disciplinary action up to, and including, suspension of privileges or dismissal.

### **Applicable Procedures and documents**

Road Safety policy

Vehicle inspection checklist

### **3.18 Sustainable Investment Program**

Sucafina will always invest with both financial consideration and sustainable value in mind. Environmental, social, and governance issues shall be considered prior to making an investment. Specifically, Country Managers will ensure land issues, including involuntary resettlement and the displacement of persons are evaluated prior to any acquisition.

### **3.19 Corporate Philanthropy**

Corporate Philanthropy projects can either be initiated by external organizations requesting funds from Sucafina SA or Sucafina SA deciding by itself to provide funds to external organizations.

### **Applicable Procedure.**

EHS - HUMAN RIGHTS P 017-Corporate philanthropy Procedure.

### **3.20 Environmental Monitoring**

Monitoring is the measurement and recording of parameters, which allows comparison to a standard. The measurement of parameters is objective and scientifically validated and is not merely a chemical analysis of the discharge from a mill. It may, for example, include the weight of waste generated, percentage of contaminants in raw materials, composition of water discharge, or opacity of a smoke stack. Environmental monitoring does not include occupational hygiene testing.

The regulatory monitoring requirements, as expressed in permits, licenses, certifications, plans, IFC standards and other regulatory requirements, are the minimum requirements for every Sucafina mill. Additional monitoring may be required due to the results of an Environmental Aspect/Impact Review; or to the results of a Formal Environmental Impact or as a specific requirement created by a remedial activity from an environmental incident reported.

The following is a guideline if the environmental media that needs to be monitored;

Air - Sites will monitor and quantify stack and fugitive emissions (e.g. ozone depleting substance or ammonia losses) where appropriate. Air emission permits for major emission sources (e.g., large boilers, cogeneration units, reformers, etc.) can require stack sampling. Sites must ensure compliance with all air emission permit or license conditions including those for smaller sources (emergency generators, flares, shot blasters, paint booths, scrubbers, etc.). Engineering estimates can be used where direct measurements are not required by regulations.

Surface water - Sites will ensure compliance with all permits or licenses for water releases/uses that require monitoring (e.g., storm water, industrial and sanitary wastewater discharges, drinking water usage). Sites

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should assess and confirm the composition of wastewater discharges from all activities on a periodic basis as described in the water quality guidelines (irrespective of whether the facility is subject to a permit or license or whether the facility has a legally specified requirement for monitoring). For facilities not required to legally monitor wastewater releases, completion of the Site Environmental Plan will help characterize the wastewater discharged from the facility.

Chemical storage - Sites should inspect material storage areas (at least monthly) for appropriate labeling, container conditions, proper containment, and evidence of spills/leaks.

Waste - With input from approved waste contractors, sites must evaluate waste to determine the nature of the waste and if it is hazardous or non-hazardous Sites will record the total weight of all wastes categorized as hazardous and non-hazardous (estimated or actual). Totals should include domestic trash. Note: Hazardous and Special Waste disposal documentation (e.g., Manifests and associated documentation) should be kept permanently. Sites must inspect hazardous (at least weekly), and non-hazardous waste storage areas (at least monthly) for proper labeling, accumulation dates, container conditions, proper containment, and evidence of spills/leaks.

Noise - Sites must conduct fence-line noise monitoring at all facilities conducting "noisy" operations (e.g. dry mill locations) to establish a baseline and ensure that local noise requirements are being met.

Coffee milling may expose employees to loud noise which may cause hearing injury and loss especially machinery and working in the workshop. All workplace employees and contractors are to use hearing protection (ear muff or plugs), to prevent hearing loss when they are working in the workplace workshop or where there is loud noise. The Company will take all reasonable steps to reduce noise levels at work, at source, to ensure the possibility of hearing damage risk to employees is reduced to a minimum. All measures will be taken that are reasonably practicable to prevent noise generated at work from affecting the local community. Work practices and procedures will be reviewed, and measures introduced to monitor noise and in order to protect the health of employees. Wherever noise levels are considered to be near the first action level in the Noise at Work Regulations, a noise level survey will be undertaken. All statutory requirements will be introduced following the results of the measurements. Information, instruction and training will be given to staff as part of a noise control and hearing conservation programme. Employees will be advised of health issues and their co-operation will be required to ensure the company is able to comply with its health and safety duties.

### **Applicable Procedures and documents.**

EHS - HUMAN RIGHTS P 010-Water quality guidelines

Legal register

Water analysis reports

Air and noise quality reports.

EHS - HUMAN RIGHTS P018-Waste management procedure

EHS - HUMAN RIGHTS P 016-Chemical management procedure

### **3.21 Environmental performance reviews**

Based upon monitoring results, sites must evaluate site environmental performance at least quarterly (e.g., ESMS Committee meetings). When environmental performance improvements are determined to be

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necessary, objectives and targets should be established. Environmental improvement programs should be documented to meet these objectives/targets, which should be incorporated in the Site Environmental Action Plan. EHS - HUMAN RIGHTS Coordinators must review business unit environmental performance at least monthly. At a minimum, records of regulatory violations/penalties, spills/releases, ozone depleting substances, carbon emissions and hazardous waste generation should be evaluated. When appropriate, Business Unit objectives and targets should be established for environmental performance improvements.

### **Applicable Procedures and documents.**

EHS - HUMAN RIGHTS P 010-Water quality guidelines

Legal register

analysis reports

EHS - HUMAN RIGHTS P 011-Energy use and conservation procedure

Water usage per month

Waste manifest by month

### **3.22 Health Management**

Sucafina pursues health and safety against physical and mental harm, as well as the prevention of occupational injuries and diseases for its workplace. All personnel are responsible to take care of his/her own health. The HR Manager/EHS Coordinator ensures the following Health rules are implemented, maintained and monitored:

- A medical fitness examination is carried out for high-risk employees, according to legal Regulation.
- Monitoring of personnel who may be exposed to health hazards and implementing a health surveillance;
- Monitoring of work sites to check and prevent health hazards;
- Health monitoring and Health programs are recorded;
- Vaccination programs or prevention of certain diseases are defined, implemented and monitored when applicable

#### **3.22.1 Alcohol and Substance Abuse**

The use of alcohol and substance abuse at work is subject to Company regulations and is a serious threat to health and individual safety. In order to eliminate these risks and to maintain a healthy and safe workplace, Sucafina through the HR manual ensures that the introduction, use, distribution or sale of alcohol within Company premises or whilst performing any Company related activities, is strictly regulated (prohibited in the case of illegal drugs). While under the influence of alcohol or drugs, workers would be strictly refused entry to the workplace.

### **3.23 Harassment**

Sucafina is committed to providing and maintaining a work environment that supports the dignity of all employees, and will make every effort to ensure that no one at the Company is subjected to any form of personal harassment at the workplace. Harassment is behaviour that could be verbal, physical, deliberate, unsolicited and unwelcome. It includes unwelcome remarks, jokes or innuendoes about a person's body or attire, leering, practical jokes which cause awkwardness or embarrassment and acts which cause humiliation, insult or intimidation. Staff found guilty of harassment will be subject to severe disciplinary action.

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**3.23.1 Sexual Harassment Policy**

Sucafina does not tolerate sexual harassment at any level. No employee regardless of his or her title has the authority, whether expressed, actual, apparent or implied, to commit sexual harassment. Sexual harassment includes but is not limited to: use of language written or unwritten of sexual nature, direct or indirect request for sexual favours, verbal or physical conduct of a sexual nature where such actions are made a condition of employment that interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment. This Policy statement on sexual harassment may be reviewed from time to time by the Management

**3.24 Human Rights**

We are committed to respecting all internationally recognized human rights and our management policies and ongoing procedures cover the breadth of these rights, principles and related issues. Our approach to human rights starts with understanding how our products, business activities and operations may impact rightsholders, both positively and negatively. We focus on the human rights issues that are most salient to our business. These include; access to grievance mechanisms, Child labor, discrimination in respect to employment and occupation, forced labor and human trafficking, land rights and acquisition, freedom of association and effective recognition of the right to collective bargain living wage and income, safety and health, worker's rights and empowerment. All human rights issues will be managed as per the human rights policy developed.

**Applicable Procedures and documents.**

Supplier code of conduct

EHS - HUMAN RIGHTS P 019-Managing guarding services within Sucafina

Sexual harassment policy

Human Rights Policy

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**Appendices**

**Record of Revisions**

Revision Date	Description	Sections Affected
1 <sup>st</sup> December, 2020	Review of the entire documentation to meet current needs and expectations	All sections
10th May 2023	Review of some sections to cover our entire operations	3.5.1-3.5.6 3.10.6 3.10.9-3.10.13 3.15.1 3.20 3.22-3.22.1 3.23-3.23.1

**Master Control Document.**

DOCUMENT NUMBER	DOCUMENT TITLE	REVISION STATUS
<b>LIST</b>		
	Document Master List	01
<b>MANUAL</b>		
	ESMS manual	03
Policies	Sucafina Group EHS - HUMAN RIGHTS Policy	01
	Sucafina Human Rights Policy	00
	Sucafina Road safety Policy	00
	Sucafina anti sexual harassment policy	00
Code of conduct	Supplier code of conduct	00
<b>PROCEDURES</b>		
EHS - HR P001	Document control procedure	01
EHS - HR P002	Record control procedure	01
EHS - HR P003	Hazard identification and risk assessment procedure	00
EHS - HR P004	Incident investigation and reporting procedure	00
EHS - HR P005	Internal EHS - HUMAN RIGHTS audit procedure	00
EHS - HR P006	ESMS committee meeting procedure	00
EHS - HR P007	Induction Procedure	01
EHS – HR P008	EHS - HUMAN RIGHTS Training procedure	00
EHS - HR P009	Contractor management procedure	00
EHS - HR P010	Water quality guidelines	01
EHS - HR P011	Energy use and conservation procedure	01
EHS - HR P012	Permit to work procedure	00
EHS - HR P013	Grievance handling procedure	00
EHS - HR P014	Energy control/Lockout tag out procedure	01
EHS - HR P015	Communication procedure	00
EHS - HR P016	Chemical management Procedure	01
EHS - HR P017	Corporate philanthropy procedure	00
EHS - HR P018	Waste management procedure	00

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DOCUMENT NUMBER	DOCUMENT TITLE	REVISION STATUS
EHS - HR P019	Managing guarding services within Sucafina	01
FORMS, CHECKLISTS AND TEMPLATES		
	Confined space entry permit	00
	Country Risk register – Template	00
	EHS - HUMAN RIGHTS Internal audit checklist template	00
	EHS - HUMAN RIGHTS Internal audit report – Template	00
	Elevated work permit	00
	Excavation work permit	00
	General permit to work form	00
	Health Questionnaire	00
	Hot work permit	00
	Induction form template	00
	Isolation permit	00
	Legal register template	00
	Monthly EHS - HUMAN RIGHTS reporting template	00
	Penalty list for EHS - HUMAN RIGHTS violations	00
	Safety statistics board	00
	Supporting certificate – Elevated work	00
	Supporting certificate- confined space entry	00
	Task based risk assessment form	00
	Vehicle inspection checklist	00
	ESMS Committee meeting minutes template	00
	Incident Investigation report template	00
	Monthly sustainability report	00
	Hazardous waste storage records	00
	Generic waste inventory register	00