

## LABOUR AND HUMAN RIGHTS PROCEDURE

MANAGEMENT OF HUMAN RIGHTS AND LABOR RISKS ASSOCIATED WITH FORCED LABOUR, CHILD LABOUR AND DISCRIMINATION IN RESPECT OF EMPLOYMENT & OCCUPATION AND THE RIGHT TO FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

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### Scope

This document is valid for all the Sucafina businesses worldwide.

### Audience

The document is relevant to the Company (Sucafina), our suppliers, contractors, sub-contractors, freelancers, members of the public and other parties engaged with the Company's business.

### Purpose

This policy reflects the underlying labor and human rights standards that Sucafina subscribes to in relation to risks associated with:

- Modern day slavery and Forced labor
- Child labor
- Discrimination in respect of employment & occupation
- Discrimination in respect to the right of freedom of association & collective bargaining
- Just and favorable remuneration
- A safe work environment

and outlines the commitment of the company to uphold these standards at all times.

The principles and guidelines set out in this policy are derived from the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the ten principles of the United Nations Global Compact which reflect our aim of respecting labor laws and standards as laid out in the United Nations Guiding Principles.

### Minimum Labor Standards

To help identify a defined set of minimum labor and human rights standards, the Company has referred to the following resources:

- United Nations Universal Declaration of Human Rights (UN-UDHR)
- United Nations Convention on the Rights of the Child (UN-CRC)
- United Nations Children's Rights and Business Principles (UN-CRBP)
- United Nations Convention on the Rights of Women (UN-CEDAW)
- International Labor Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work
- Conventions and recommendations of the ILO on labour and social standards, particularly the ILO conventions No. 182 on the Worst Forms of Child Labour and No. 138 on the Minimum Age for Admission to Employment and Work
- OECD Guidelines for Multinational Enterprises
- The UN Global Compact principles:
  - Elimination of all forced and compulsory labor (UN Global compact principle 4)
  - Effective abolition of Child labor (UN Global Compact Principle No.5)
  - Elimination of discrimination in respect of employment and occupation (UN Global Compact Principle No.6)

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- Freedom of Association and effective recognition of the right to collective bargain (UN Global Compact Principle No.3)
- Social Accountability SA 8000 International standard
- Country specific regulations related to labor.

## Definitions

Term	Description
Child	Every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier’.
Freedom of Association	A respect for the right of all employers and all workers to freely and voluntarily establish and join groups for the promotion and defense of their occupational interests.
Forced Labor	All work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.
Collective bargaining	A voluntary process through which employers and workers discuss and negotiate their relations, in particular terms and conditions of work. Participants include employers themselves or their organizations, and trade unions or, in their absence, representatives freely designated by the workers.
Working age	As per ILO, the minimum age for work should not be below the age for finishing compulsory schooling, and in all cases not lower than 15 years of age. A reference index has been developed for all of Sucafina’s origin and operation countries (Appendix 1)
Young worker	As per the ILO, a ‘young worker’ is defined as a worker who has reached the minimum working age but is not yet 18 years old.
Child labor	According to the ILO, ‘child labor’ is defined as work that ‘deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development’ This includes: <ul style="list-style-type: none"> <li>● Any child below the minimum working age engaged in non-light work, and</li> <li>● Young workers engaged in hazardous work.</li> </ul>
Light work	In compliance with the ILO conventions, UNCRC, national laws and regulations, light work will only be permitted if it happens outside of school hours, falls into the category of light work (Appendix 2) and fulfils the following criteria: <ul style="list-style-type: none"> <li>● It must be age-appropriate and must not threaten the child’s health or development.</li> <li>● It must be in line with children ‘s rights. The work should not negatively impact the development and education of the child. It should not compromise their attendance at school or time dedicated to homework, playtime and sleeping time, their participation in vocational orientation or training programmes.</li> </ul>

	<ul style="list-style-type: none"> <li>• It must not take place on a continuous basis (e.g. it should only take place after school or during holidays) and must take place under non-exploitive conditions.</li> <li>• It must be supervised by either the child’s parents or guardians, who can ensure the tasks provided to children are not harmful to their current and future health, physical development or interfere with their schooling.</li> </ul>
Hazardous work	According to the ILO, ‘hazardous work’ is defined as any kind of work that might be prejudicial to a person’s health, safety, morals, and development including, but not limited to, night shifts, overtime, moving heavy objects, exposure to extreme temperature and noise, exposure to chemicals and handling dangerous machinery.
Risk Assessment	the process of evaluating the risks to safety and health arising from hazards at work, forms an integral part of the Occupational Safety and Health Management System, whereby all hazards are identified and evaluated taking into consideration existing control measures.

### Risk Assessment

For the purpose of assessing risk, SUCAFINA will analyze both Geographic and Supply Chain risks as detailed below:

Geographic Risks – risks that derive primarily from weak governance or a lack of clear legal frameworks at national level. These risks will be evaluated before Sucafina invests in any geographical location and information derived from sources listed in table 1.

At a global level: The group must be able to gauge the levels of risk that exists in each origin. Such risk will be primarily assessed on the basis of widely available barometers and public sources of information (see table 1). Global risk assessments will be the primary guide in formulating an appropriate corporate strategy and response to labor and human rights risk, for instance whether to proceed with new investments or expansions in new origins and under what circumstances.

At a regional (in-country) level: Country Managers must be able to gauge the risk profile that exists at a regional level within origins, perhaps due to localized conflicts, or the absence of strong legal frameworks in parts of a country. Such analysis can lead to downsizing of operations, or the implementation of mitigation strategies to strengthen labor and human rights conditions where necessary.

Supply Chain Risks – These are labor related risks that can arise in any of the supply chain processes including own operations, farms or cooperatives, strategic suppliers and other intermediaries. Managers must be able to segment risk within operations and suppliers.

Own operations are defined as all facilities, business units, owned, leased or operated by SUCAFINA or one of its related companies.

Farms or Cooperatives from which Sucafina or one of its related companies’ sources coffee directly.

Strategic suppliers are those who supply a majority of their produce to SUCAFINA, or whose business makes up a significant portion of SUCAFINA’s turnover by volume in a given origin and calendar year. The group ESMS committee is responsible for setting progressive targets for the definition of a strategic supplier annually. For 2021, the baseline is defined as any supplier who contributes 12.5% or more of an origin’s purchase volume in the previous calendar year.

Other intermediaries are those whose volume falls below the volume threshold set for strategic suppliers.

During the early stages of due diligence, it is essential that all Sucafina managers undertake a risk assessment to identify where risks of child labor, forced labor or worker discrimination are highest within its activities or sphere of influence. The identification of child labor, forced labor or worker discrimination is a difficult task. The line between a situation that may fall within the definition and one which may not, can be difficult to draw and may require contextual and subjective analysis. One approach is to focus on indicators of risk that can suggest where child labor, forced labor or worker discrimination risks are highest.

Identifying high level risk indicators is a useful starting point in the risk assessment process since it is less resource intensive than assessing each business partner in detail and allows resources to be prioritized appropriately. A useful way to obtain some of this information can be through a pre-screening questionnaire. The table below provides some sample indicators which will be used to identify high level labor and human rights related risks.

High level indicators to look for:	Source of Information:
Ask: Is there a high risk of Human rights abuse in the country or region?	
<ul style="list-style-type: none"> <li>Country and/or region has high child labor, forced labor or worker discrimination risk</li> <li>Work is in or next to a fragile and conflict affected region</li> <li>There are gaps in law and enforcement on child labor, forced labor or worker discrimination</li> </ul>	<ul style="list-style-type: none"> <li>The Business and Human Rights Resource Centre</li> <li>US Department of Labor</li> <li>Tools developed by Verité, including a Knowledge Portal on forced labor</li> <li>ITUC’s Global Rights Index</li> <li>Background media / news research</li> </ul>
Ask: What type of workers are (likely to be) present on the worksite?	
The presence (especially in large numbers) of: <ul style="list-style-type: none"> <li>Internal / foreign migrant workers</li> <li>Refugees (a particularly vulnerable group)</li> <li>Low skilled workers</li> <li>High numbers of informal workers</li> <li>Women (subject to higher likelihood of threat and coercion through use of sexual violence, bullying etc.) Temporary / agency / contract / seasonal worker</li> </ul>	<ul style="list-style-type: none"> <li>Information from pre-screening questionnaires</li> <li>Regular reporting from third-party</li> <li>Initial due diligence visit</li> <li>Monitoring visits to worksites</li> <li>Engagement with expert stakeholders including civil society and trade unions</li> </ul>
Ask: Are there characteristics of the third-party’s management systems or sites that may lead to risks?	
<ul style="list-style-type: none"> <li>Allegations of poor practices against a business partner</li> <li>Early stages of work on a site or of production in a supply chain</li> <li>Inadequate / poor management systems</li> </ul>	<ul style="list-style-type: none"> <li>Company bids / applications for work</li> <li>Project Environmental Social Management Systems (ESMS), human resources policies and procedures</li> <li>Supply chain information</li> </ul>

<ul style="list-style-type: none"> <li>• High turnover of key managerial staff</li> <li>• Lack of transparency</li> <li>• Complex sub-contracting / supply chains</li> <li>• Abnormally low tender / contract cost with third party</li> </ul>	<ul style="list-style-type: none"> <li>• Initial due diligence visit</li> <li>• Monitoring visits to worksites</li> </ul>
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Where high level risks have been identified through an initial screening process, it is important to follow up with a more detailed risk assessment. Detailed risk assessments are useful to investigate and verify identified risks or to monitor potential labor and human rights issues on specific regions of operations. They may be used as part of during initial due diligence or as part of ongoing monitoring and “auditing” of a site to provide assurance that they are complying or will comply with our standards.

### Forced or Compulsory Labor

In accordance with ILO convention no. 29, Sucafina shall not permit, engage in or support the use of forced or compulsory labor which will include but not limited to (see table below for further guidance);

- Prison Labor: Work performed by incarcerated individuals as a requirement of their sentence.
- Indentured Labor: Work performed by individuals contractually bound to their employer for a designated time period, usually in return for payment of travel and living expenses.
- Bonded Labor: Work performed by individuals who are subjected to loans that they are required to pay off through low wages by the lender and employer.
- Modern slavery: This is the severe exploitation of other people for personal or commercial gain.

This applies to all Sucafina Operations, to Sucafina suppliers, business partners, contractors and sub-contractors. Employees and workers are free to leave after providing reasonable notice in line with their individual contracts of employment.

To identify any form of forced labor in practice within Sucafina area of influence (entire supply chain), the following table should be used.

Lack of consent to work (the “route into” forced labor)	Menace of a penalty (the means of keeping someone in forced labor)
<ul style="list-style-type: none"> <li>• Birth/descent into “slave” or bonded status</li> </ul>	<ul style="list-style-type: none"> <li>• Physical violence against worker or family or close associates.</li> </ul>
<ul style="list-style-type: none"> <li>• Physical abduction or kidnapping</li> </ul>	<ul style="list-style-type: none"> <li>• Sexual violence.</li> </ul>
<ul style="list-style-type: none"> <li>• Sale of a person into the ownership of another</li> </ul>	<ul style="list-style-type: none"> <li>• (Threat of) retaliation.</li> </ul>
<ul style="list-style-type: none"> <li>• Physical confinement in the work location – in prison or in private detention</li> </ul>	<ul style="list-style-type: none"> <li>• Imprisonment or other physical confinement</li> <li>• Financial penalties.</li> </ul>
<ul style="list-style-type: none"> <li>• Psychological compulsion, i.e. an order to work, backed up by a credible threat of a penalty for non-compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Denunciation to authorities (police, immigration, etc.) and deportation.</li> </ul>
<ul style="list-style-type: none"> <li>• Induced indebtedness (by falsification of accounts, inflated prices, reduced value of</li> </ul>	<ul style="list-style-type: none"> <li>• Exclusion from future employment.</li> <li>• Exclusion from community and social life.</li> </ul>

goods or services produced, excessive interest charges, etc.)	<ul style="list-style-type: none"> <li>• Removal of rights or privileges.</li> </ul>
<ul style="list-style-type: none"> <li>• Deception or false promises about types and terms of work.</li> </ul>	<ul style="list-style-type: none"> <li>• Deprivation of food, shelter or other necessities.</li> </ul>
<ul style="list-style-type: none"> <li>• Withholding and non-payment of wages</li> </ul>	<ul style="list-style-type: none"> <li>• Shift to even worse working conditions</li> </ul>
<ul style="list-style-type: none"> <li>• Retention of identity documents or other valuable personal possessions.</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of social status.</li> </ul>

In alignment with ILO convention no. 105 on the Abolition of Forced Labor, before investing in any country, the sustainability team will carry out background check using the Verité tool or other additional resources e.g information from the US Department of labor to determine if there have been any historical occurrences of forced labor in the country and advise the Group management accordingly.

Suppliers selection criteria will include background check (where applicable review of internet sources and interviews with locals) by the country manager on any reportable cases that have been associated with the supplier. Results of the evaluation shall be documented and filed for future evaluations. Upon selection, ongoing risk assessments will be conducted as part of supplier performance evaluation before contract renewals.

### Child Labor

Sucafina does not and will not engage in or support the use of child labor. If the Company engages any young workers (e.g. on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions (Appendix 3), or in any case work more than 8 hours per day.

All Sucafina managers must ensure that child labor does not occur at any of our locations or in any Sucafina area of influence including farms, intermediaries and the wider supply chain network. Managers should also ensure that they do not exclude young workers based solely on their age for all low risk and non-hazardous tasks (Appendix 4). A sound hiring, positioning of and safe working environment for young workers has been put in place through the HR recruitment policy and EHS policies in place. In all cases, children under the age of 15 must not be admitted to employment, at Sucafina’s own operations, strategic suppliers, farmers and coops, and other intermediaries that work within Sucafina’s supply chains.

Managers should ensure that all sites (own operations and suppliers) have the following measures in place, at a minimum:

- An employment policy as a basis for hiring decisions at all levels, which explicitly states the minimum age for work and fully respects young workers’ rights at work- to be clearly posted and visible to everyone.
- A robust age verification mechanism as part of the recruitment process.
- Requirements on equal pay (ILO convention no. 100), work hours, non-hazardous positions, list of age-appropriate job positions for young workers defined by a task-based risk assessment at own facilities, suppliers, farms and coops.

- HR systems to monitor and protect young workers, incl. specific EHS training, visual aid at worksites (e.g. color-coded uniforms), spot checks.
- A young worker listing with names, dates of birth and current job position.

Remediation protocol for young workers identified in hazardous work situations

If a young worker is identified in a hazardous position, he or she will be immediately removed from the situation and reassigned to a non-hazardous position. Medical follow-up may be arranged if necessary. If no other non-hazardous position is available, the employment will be terminated and the salary paid in full. Follow-up measures will be implemented to ensure that there is no return to the hazardous position.

To ensure all strategic suppliers comply to this policy, the country managers will ensure that they carry out a risk assessment for the strategic suppliers every year as a way of ensuring that they are not engaging in child labor practices. This will include regular household surveys in origin communities to understand children’s involvement in light work or other income generating activities, in order to identify risk areas and mitigation strategies.

Where possible, conducting inspections at suppliers site before engaging them for the long term.

Supply chain mapping will be required for every country identified as a high risk. Supply chain mapping includes a graphical representation of the company’s supplier network (or of selected supply networks). Maps can either be geographical, be an abstract network design, or can be broken down in flow chart and data points on the level of different supplier tiers (strategic suppliers, farms/cooperatives or other intermediaries).

Once the supply chain is mapped, a detailed risk assessment needs to be undertaken to determine in which parts of the supply chain occurrence of child or forced labor is more likely. Sucafina can consult open sources or acquire specific services which offer a detailed geographic analysis of human rights and labor rights situations in different countries or regions. Risk assessments can then be prioritized in those countries and regions that show the highest risk potential and it will not be necessary to use resources to analyze the whole supply chain. For prioritization of the supply chain, pareto analysis will be employed with key focus on the strategic suppliers, farms and cooperatives and later the entire supply chain.

The following table builds on a more extensive causes of child labor. It includes general contextual factors that heighten the overall risk of child labor impacts, as well as specific push and pull factors and can be used in the risk assessment process.

Causes and General Contextual Factors Include:	
<ul style="list-style-type: none"> <li>✓ Poor enforcement of child labor laws</li> <li>✓ Inadequate social protections</li> <li>✓ Lack of quality education for the poor</li> <li>✓ Endemic poverty</li> <li>✓ Weak rule of law</li> <li>✓ Absence of systems for workplace collaboration</li> <li>✓ Large parts of the economy are informal</li> <li>✓ Rural areas with inadequate infrastructure</li> </ul>	
Push Factors Include:	Pull Factors Include:

<ul style="list-style-type: none"> <li>✓ Household and community</li> <li>✓ Poverty</li> <li>✓ Economic shocks (e.g. Unanticipated health problems)</li> <li>✓ Social acceptance of child labor</li> <li>✓ Insufficient educational opportunities and/or social or bureaucratic barriers to education</li> <li>✓ Discrimination in access to schooling or certain jobs</li> <li>✓ Lack of parental guidance and support</li> </ul>	<ul style="list-style-type: none"> <li>✓ Attraction of earning an income</li> <li>✓ Unregulated enterprises in informal economy</li> <li>✓ Unprotected migrants seeking income earning opportunities</li> <li>✓ Family enterprises that rely on their children’s work because they are not able to employ adult labor</li> <li>✓ Certain work that is commonly organized such that it can be performed only by children</li> <li>✓ Hiring practices of recruitment or employment agencies or approaches by individual labor brokers</li> </ul>
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### Discrimination in respect of employment and occupation

Following the guidelines of ILO convention no. 111, Sucafina does not tolerate any form of discrimination in respect of employment and occupation. Discrimination pertains to when a potential candidate is treated differently or less favorably because of characteristics that are not related to his/her merit or the inherent requirements of the job. These characteristics commonly include in national law: race, color, sex, religion, political opinion, national extraction or social origin.

Discrimination can arise in a variety of work-related activities. These include access to employment, particular occupations, training and vocational guidance and social security. Moreover, it can occur with respect to the terms and conditions of employment, such as:

- recruitment
- remuneration (ILO convention No. 100)
- hours of work and rest, paid holidays
- maternity protection
- security of tenure
- job assignments
- performance assessment and advancement
- training opportunities
- promotion prospects
- occupational safety and health
- termination of employment.

Sucafina will ensure that employees are selected on the basis of their suitability to do the job and that there is no distinction, exclusion or preference made on other grounds.

To determine whether there is discrimination in respect to employment and occupation at a regional or country level, Sucafina will review the labor laws in each of those respective countries and also check on the ruling of the labor cases that have been concluded. Part of it is to check if the country or region has a

non-discrimination Act or similar laws that prohibit discrimination. These will enable the country Manager

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and the Group management to understand if the country upholds labor laws as per ILO standards and how labor issues are managed.

Prior to engagement, all strategic suppliers will be required to provide their employment policies as part of desktop review to determine if all areas mentioned above are addressed. Interviews with locals on the supplier’s labor practices will be conducted including review of the grievance form/registers to determine how reported grievances were addressed by the supplier and if there are cases of recurrence.

### Just remuneration and fair work

Sucafina will ensure that there is respect for labor standards in relation to working hours which cannot exceed 48 hours in a regular week or 60 hours including overtime in all its supply chains, this is a requirement to be demonstrated by all suppliers and business partners. In accordance with ILO convention 100, Sucafina will ensure there is just and equitable remuneration without any discrimination on the basis of race, color, sex, religion, political opinion, national extraction or social origin. In addition, in the interest of mitigating possible exploitation in piece-rate labor, it will also be part of Sucafina’s policy to establish minimum wage for piece-rate work performed during normal working hours.

### Freedom of Association and effective recognition of the right to collective bargain

Freedom of association has enabled Sucafina to protect better not only our own economic interests but also the civil freedoms of our employees such as the right to life, to security, to integrity, and to personal and collective freedom.

Establishing genuine dialogue with freely chosen workers’ representatives enables both workers and management to understand each other’s problems better and find ways to resolve them. Security of representation is a foundation for building trust on both sides.

Sucafina will review the labor laws and past industrial court/labor rulings of the countries where it operates to determine if freedom of association has been well covered. These will enable the organization to make clear decisions on how to ensure there is freedom of association and the right to collective bargain as required by ILO Conventions No. 87 and No. 98.

It will also be part of the supplier requirement to demonstrate compliance to the country labor laws associated with freedom of association. Some of the key parameters to be covered include; determination if there is a worker’s representative selected by the employees to represent them or if there is a union where all workers are allowed to join. Where there is no worker representation, a detailed workplace assessment and interview of the workers need to be conducted to determine if there is freedom of association and the right to collective bargaining.

### Preventive strategy

As a preventive strategy at all its areas of influence, Sucafina will ensure the following measures are put in place at both Sucafina operations and the entire supply chain.

#### At Sucafina operations:

- Adhere to provisions of national laws and regulations concerning labor and human rights and where national law is insufficient, take account of international labor standards including

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compliance to minimum working age provisions.

- As part of induction process, ensure all new employees are taken through the policy upon joining the organization.
- Annual trainings on the human rights policy for all relevant employees as part of refresher trainings.
- Carry out internal audits to review compliance to this policy at Sucafina operations.
- Within company operations, ensure that employment contracts are provided to all permanent employees stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures).
- Prohibit any requirement that workers lodge financial deposits with the company.

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- Encourage managers to review the risk assessment table and take action as appropriate.
- If any form of contravention to this labor policy is identified within the company’s sphere of influence, inform management who will take the appropriate cause of action.
- Exercise due diligence in dealings with other businesses.
- Verify the age of applicants for employment by requiring presentation of valid identification issued by an official authority prior to employment. A copy of such identification and all other legally required documentation must be kept on file during the entire period of employment. In the event it should prove impossible to present such identification, other legal proof of age such as a diploma, birth certificate or official document from the place of residence of the applicant may be accepted. The hiring manager will be responsible for verification of the authenticity of documents submitted. In cases in which the physical appearance of an applicant does not seem to be consistent with the documents presented, medical documents from a reliable source should be required as proof of age. Hiring Managers must also determine whether applicants have already completed their compulsory schooling.
- Ensure all employees read and understand the Sucafina Code of Conduct. Annual trainings to be conducted for all staff on the Code of Conduct.
- Assign responsibility for equal employment issues at a high level, issue clear company-wide policies and procedures to guide equal employment practices, and link advancement to desired performance in this area.
- Reasonably adjust the physical environment to ensure health and safety for employees, customers and other visitors with disabilities.
- Work on a case by case basis to evaluate whether a distinction is an inherent requirement of a job, and avoid applications of job requirements in a way that would systematically disadvantage certain groups.
- Keep up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for employees and their progression within the organization.
- Where unfair practices or discrimination is identified, implement grievance procedures to address complaints, handle appeals and provide recourse for employees. This and other action to avoid or remedy discrimination is particularly important in the context of negotiations and collective agreements.
- Be aware of formal structures and informal cultural issues that can prevent employees from raising concerns and grievances.
- Establish programs to promote access to skills development training and to particular occupations.

[At the entire Supply chain \(Farms/cooperatives, strategic suppliers and intermediaries\)](#)

Supplier Self-Assessments

As a first step, strategic suppliers and subcontractors will fill out a self-assessment form with questions that refer to the different parts of the Supplier Code of Conduct and give insight in the current status of compliance and management with the Code requirements. Self-assessment responses will be analyzed to get a clear profile of the current practices of the suppliers. But it should be kept in mind that the responses have been provided by suppliers and therefore should be validated to confirm their objectivity. The Self-Assessment Tool, available in Annex 2 of this document, is a resource to assess how our strategic suppliers’

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manage human rights issues. The self-assessment will also be used to help the strategic suppliers to structure their own monitoring system.

Site Visit

An integral part of an assessment of a strategic supplier is a site visit, which includes a tour of the suppliers’ facilities that can provide an initial impression of the working conditions, complemented with review of records and interviews with managers and workers. In order to get a complete picture, it is mandatory that the staff conducting the site visits have the appropriate language skills and cultural awareness to engage with managers and workers in meaningful two-way conversations. Site visits will be required for all strategic suppliers and any supplier classified as high risk.

Social Audits

Contracting external experts from local NGOs or consultancy firms to conduct a compliance audit is a way to obtain information about a supplier’s working conditions, i.e., an on-site evaluation of supplier performance in relation to the company’s policies and expectations. The experts selected will be competent, will have knowledge of the local context and languages, and will have the skills and knowledge for evaluating and responding to labor situations. Their reports will be based on physical observations, document analysis, and information gathered from meetings with managers and interviews with workers and stakeholders. If the workers are organized into one or more unions, the assessors will have a meeting with the employee representatives and should review any existing collective bargaining agreements. Alternatively, Sucafina may choose to perform compliance audits by using its own trained staff. In order to ensure openness and the best possible information, interviews with the workers should be carried out without the managers being present and in such a way that the workers do not risk reprisals. Sucafina will assess the strategic suppliers annually, either by commissioning experts or having internal staff perform the audits. Audit findings should be followed up on by concrete improvement measures in the form of a corrective action plan. Therefore, Sucafina will ensure that the experts it engages – whether external experts or trained internal staff – can both identify violations and weaknesses and propose improvement measures. Sucafina supplier social audit checklist can be used as reference document while conducting the audits.

Impact Assessment and Stakeholder Engagement

Developing an accurate picture of the actual and potential impacts of the operations of Sucafina on labor and human rights requires consultation with a range of relevant stakeholders. To understand who are its key stakeholders, and how they can contribute to the due diligence process, each country will develop a stakeholder map. A stakeholder map is a tool that identifies who are the key stakeholders, how they relate to each other, and what might be their priorities and interests with respect to Sucafina at the country of operation in relation to human rights. Stakeholder dialogue can include meetings with suppliers, workers and worker representatives, local authorities and local experts such as NGOs. Other relevant stakeholders who can advise and support this process are like Save the Children, multi-stakeholder initiatives (MSIs), industry-specific organizations such as the Country Association of Coffee Producers/Traders and human rights advocacy groups such as Amnesty International (AI). Once a potential or actual negative human rights or labor impact has been identified, the country MD should collaborate with suppliers and other relevant stakeholders to agree upon measures to:

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- Prevent a potential negative impact from occurring;
- Reduce the likelihood and/or consequence of a potential negative impact;
- Repair damage or compensate for actual negative impacts.

### Remediation

In addition to Sucafina's engagement to respect the rights and best interests of rightsholders in its supply chain, we commit to provide remediation to individuals harmed in the context of Sucafina's activities, whether it causes the damage or contributes to it through its subcontractors.

To this end, we have defined and implemented a clear remediation protocol for our staff and business partners (Appendix 5: Remediation Mechanism for Human Rights violations)

Remediation is intended to correct problems or issues that affect labor issues as documented in this policy. There are two types of remediation:

- Remediation of violations within the internal processes of the company
- Remediation related to supplier violations

#### Remediation of Internal Processes – Purchasing Practices

Sucafina's own purchasing practices can contribute to or cause adverse impacts on labor and human rights in the supply chain. The company will identify actual or potential adverse impacts on labor and human rights that are directly or indirectly linked to the company's own procedures or practices using root cause analysis. These procedures or practices will be adjusted in order to prevent, mitigate or remedy such impacts. Examples of purchasing practices that can have negative impacts on working conditions are late payment of orders that results in delayed payment to workers and negotiated prices that do not allow the suppliers to pay workers the wages they are required by law.

#### Remediation of Internal Processes – Recruitment and employee relations

All Cases of forced and compulsory labor will be investigated as per the incident investigation guidelines. Based on the outcome of the investigations, consequence management will be applied to all concerned parties. This will include termination of employment for all the hiring managers involved and compensation of the victims. Where gaps are identified during the internal/ social audit process, they will be categorized as S1 audit findings as per the audit classification guidelines.

Any form of discrimination identified internally will be handled as per the company HR policies and procedures.

All staff will be trained on the company Code of Conduct and a grievance mechanism will be established in every area where Sucafina has its operations. The grievances will be addressed within the shortest period and feedback given to staff on what management has done to address those grievances raised.

#### Remediation Related to Findings of Supplier Violations

Remediation of findings on the supplier side will be properly managed by Sucafina and it will be assured that the purchasing practices of Sucafina do not hinder the improvement process. The main tool to guarantee permanent improvement is a corrective action plan which is submitted by the supplier and validated and monitored by our team.

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### Corrective Action Plan

Results of the social audits, but also findings based on the self-assessments or adhoc audits, can be used to set up a corrective action plan for the suppliers. Corrective actions should address all detected non-compliances with regard to the Code of Conduct, and those that are most critical must get be addressed immediately, while minor non-compliances may be resolved with longer deadlines. Issues related to child and forced labor belong to the first category of findings and need immediate remediation

Where Sucafina sources coffee through an agent, Sucafina will ensure that these intermediaries also contribute to improving conditions at the facilities of their suppliers as set out in this document. The corrective action plan should be agreed upon (signed) by both the company and the supplier in order to formalize the obligations embodied in the plan.

In the case of remediation for individual victims, corrective action plans should include:

- Protocols for immediate remedial actions, such as referral to law enforcement or appropriate authorities, in cases where auditors discover violations of child or forced labor laws;
- Resources/ compensation for victims such as rehabilitation, education, training, employment, appropriate housing, counseling, restitution for lost wages and other material assistance.

In the case of remediation of company's and/ or suppliers' systems and processes, the corrective action plans will include:

- Working with suppliers in situations where violations of child labor and/or forced labor standards have been found to develop and implement systems to correct such violations and to build systems aimed at reducing child and/or forced labor on a systematic basis;
- Where appropriate, provide technical assistance to help suppliers with known violations to address specific issues; also provide technical assistance on broader labor issues that underlie child/forced labor (e.g., workplace cooperation, quality control and assurance, health and safety, productivity, working conditions, and human resource management);
- Where appropriate, include negative incentives for suppliers for example in cases where suppliers have performed poorly and have experienced repeated violations of the company child and/or forced labor standards. The negative incentives may include termination, suspension or reduction of contracts. These steps should only be taken after other remediation and engagement efforts have been explored and failed to achieve the desired results.

### Key Performance indicators

The definition of clear goals is a necessary basis for the review process. Below are some examples of possible Key Performance Indicators (KPIs) regarding this labor policy:

KPI	Description
Child/ Forced Labor Prevalence	Frequency of evidence of child /forced labor or of cases where minimum age for workers is not respected.
Total Number of Violations	Number of violations regarding irregular labor reported from the audits.

Suppliers with Violations	Number of suppliers with reported violations of child labor.
Grievance mechanism	Number of grievances reported and number of unresolved grievances.
Social Audits	Number of suppliers audited
Training	Number of suppliers and staff trained

### Training and capacity building

As part of our continuous efforts to achieve effective and sustainable practices within the supply chain, Sucafina will initiate a system of multi-level and cross-functional training and capacity building sessions within our global supplier network.

All new employees will be given induction training to familiarize themselves with Sucafina policies and procedures, including our Workplace Standards. Focused labor related trainings will be delivered at each office annually for existing employees.

All suppliers and staff will be expected to go through the online training on forced labor and present evidence of completion for record keeping. The training can be accessed through;

<https://www.verite.org/services/training/forced-labor-e-learning-course/>

Guidelines on roles and obligations for farms and cooperatives, strategic suppliers and supply chain partners, specific to their organizations and risks:

- Obligation to sensitize, monitor, train and support their upstream business partners, including communicating Sucafina’s commitments and requirements, monitor implementation of relevant procedures, provide cascading trainings and support mitigating and remediation measures
- Obligation to follow specific remediation steps and timeframe from critical actions as required in Appendix 5: critical cases reported within 24h, corrective actions are taken 30 days after the Human Rights violation is identified.

Should our business partner fail to fulfil these obligations, we may suspend the business relationship until remediation action is taken or terminate the business relationship in the event of repeated breaches of these obligations.

### Related Documentation

- Sucafina Human Rights Policy Statement
- Sucafina Supplier code of conduct.
- Supplier Self-assessment form
- Sucafina Supplier Social audit checklist
- Sucafina’s Global Gender Strategy

APPENDIX 1: MINIMUM AGE INDEX

	<u>Light Work</u> incl. in homework and own farm	Regular Work Legal minimum working age	Hazardous Work
Brazil	15	16	18
Burundi	12 >13	16	18
China	15	16	18
Colombia	15	15	18
Cote d'Ivoire	15	16	18
Ethiopia	14	15	18
India	14	14 >15	18
Indonesia	13	15	18
Kenya	13	16	18
PNG	15	16	16
Rwanda	15	16	18
Tanzania	14	14>15	18
Uganda	12 >13	16	18
Vietnam	13	15	18

APPENDIX 2: DEFINITION OF LIGHT WORK IN COFFEE GROWING FARMS AND ESTATES



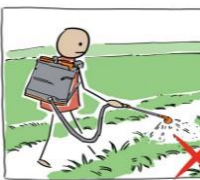
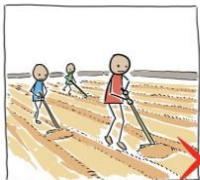


















In addition to attending school and completing homework, children aged 13 or over are permitted to do household chores and light work (under adult supervision) that will not threaten their health, safety or hinder their education/vocational training.

The light work children can do is limited to work within their own household/farm, and not by employment by others.

The maximum hours allowed for such work is 14 hours maximum/week per ILO recommendation






APPENDIX 3: HAZARDOUS WORK

Planting					
	Driving and operating tractors/ agricultural machines. 	Cutting grass. 	Spraying, handling and application of fertilizer & pesticides. 	Working outdoor without adequate protection against sun, rain, cold. 	
	Harvesting				
		Picking at height over 2 meters 	Heavy lifting, transport, loading, unloading 	Dragging tarpaulin 	Working outdoor w/o adequate protection against sun, rain, cold 
Processing					
		Transporting with motorbikes or tractors 	Using pulping machine without adult supervision or sufficient training 	Drying & sorting in the sun without hats and gloves 	

APPENDIX 4: LOW RISK AND NON-HAZARDOUS TASKS




**Weeding**

- Use gloves and personal protective gears.
- No work under extreme weather.



**Watering coffee seedlings or trees**

- Water-resistant boots and hat should be used.
- Water pumping machine should be operated by an adult to avoid electric shock.


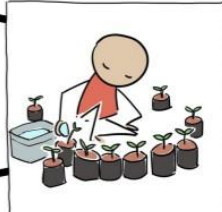

**Picking coffee cherries**

- Work on the ground/No work on ladder or at height.



**Work indoor/in the nursery/office work**

- With proper PPE if needed, e.g. gloves, safety boots.
- Work in the office as apprentice, e.g. filling forms, handling calculations.

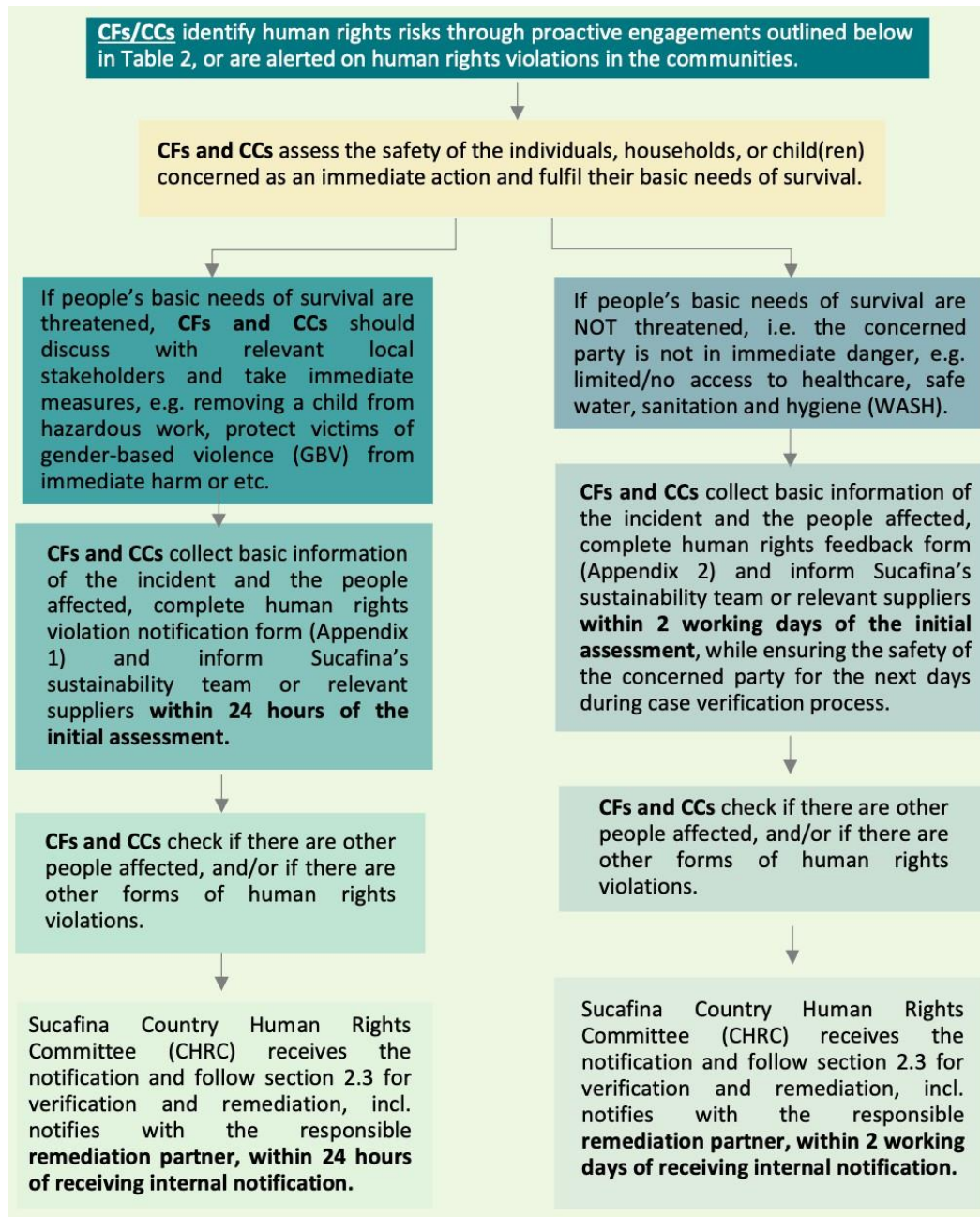




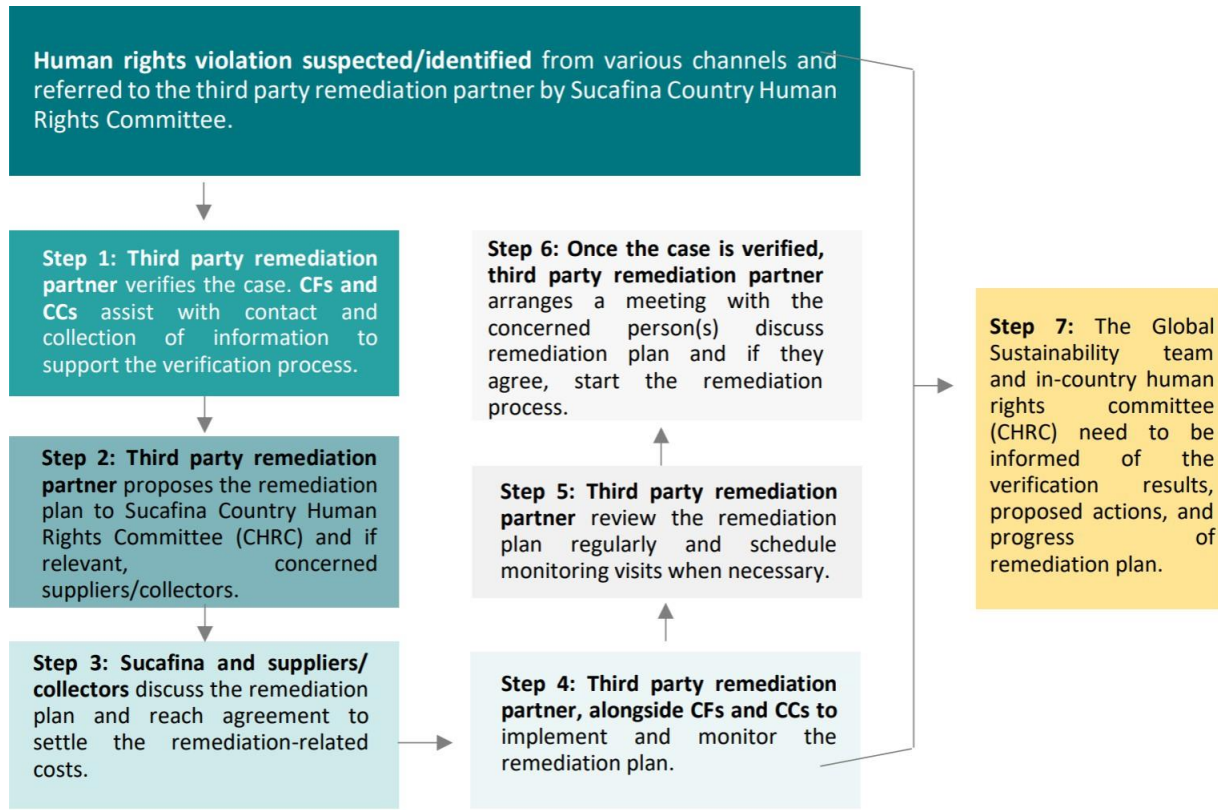
**Sorting and drying coffee beans**

- Use gloves and a hat.

APPENDIX 5: REMEDIATION MECHANISM & TIMEFRAME





A third-party remediation partner / service providers are external organizations, NGOs or CSOs that can be engaged to support the protection of Human Rights within Sucafina’s supply chains.