

Aspinwall and Company Limited (Aspinwall) is committed to conducting its business in an ethical, legal, environmentally and socially responsible manner. While our policies ensure that we comply with applicable laws & regulations, our aim is to work continuously to improve the sustainability of operations and we try to demonstrate our commitment to invest in protecting the environment, enhancing traceability and expanding the development of sustainable programmes. We expect our suppliers to share our commitment to doing business in a responsible, sustainable and ethical manner.

This Code of Conduct (CoC) strengthens the continued implementation of Aspinwall's commitment to international standards such as the Universal Declaration on Human Rights, Convention on the Rights of the Child, and the Core Conventions of the International Labour Organisation (ILO). This CoC stipulates the minimum requirements that our suppliers shall respect and meet within their own operations and within their supply chain. Furthermore, we expect our suppliers to be transparent and have an open dialogue with us about challenges which they encounter as part of their operations. Aspinwall will support its suppliers' efforts to meet the standards through dialogue and cooperation. Any supplier who does not meet the requirements in this CoC needs to take corrective actions and show progress. If the supplier is unwilling or unable to carry out corrective actions, Aspinwall is entitled to terminate the business relationship and any contract(s) with the supplier immediately.

We expect our Suppliers to act in accordance with the below furnished set of Supplier Code of Conduct.

## 1. Legal & ethical compliances.

In addition to adherence to this CoC, Aspinwall expects all suppliers to comply with all applicable national laws and regulations, industry minimum standards and any other relevant legal requirements. Aspinwall expects the highest standards of ethical conduct in all of its endeavours. Suppliers should always be ethical in all aspects of their businesses, including their relationships, practices, sourcing and operations. Aspinwall expects that suppliers will comply with the applicable laws in this regard. Aspinwall expects that suppliers will not offer any benefit, either in cash or in kind, to any officer or employee or any relative/associate of any officer or employee of Aspinwall or of any of its associate companies, in order to facilitate its business with Aspinwall.

## 2. Labour Practices

Aspinwall recognises and respects that its suppliers are independent entities and the exclusive employers of their employees. Aspinwall expects that the vendors and service providers will comply with all the current labour legislations & Human rights at all times and will respect the following:

### A. Child Labour:

Suppliers shall only employ workers that are above the legal minimum age as per the applicable laws. We adhere to local laws regarding minimum employment age and do not employ children who are under the local minimum school leaving age. We expect the same approach from our Suppliers and that a Supplier complies with the governing laws or standards.

**B. Anti-Discrimination and Fair Treatment:**

Suppliers shall promote and maintain a workplace free from discrimination and treat their employees with fairness, dignity and respect. They shall not discriminate against their employees based on their caste, religion, disability, gender, sexual orientation, race, colour, ancestry, marital status or affiliation with a political group/party, religious organisation, union membership or any majority/minority group. Suppliers shall adopt a strict no-tolerance policy with respect to any form of physical, sexual, psychological or verbal harassment or abuse.

**C. Forced Labour.**

Workers of suppliers shall be free to leave work or terminate their employment upon reasonable notice. Suppliers should not use forced or bonded labour in any form.

**D. Freedom of association and right to collective bargaining.**

All employees shall have the right to form, join and organize trade unions of their choice and to bargain collectively on their behalf with the supplier. The interests of the employees shall be respected without the fear of threats or harassment. In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, Aspinwall expects suppliers to allow alternate forms of freely elected and effective worker representations.

**E. Safe and Healthy Working Conditions:**

Suppliers are expected to comply with all applicable laws and to make every possible endeavour to make the workplace, machinery, equipment and processes free from any risk to the personal safety of any person working in such workplace or with access to such equipment and process. Suppliers should ensure, at a minimum, reasonable access to potable water and sanitary facilities, adequate lighting and ventilation and fire safety. Suppliers shall manage all health and safety risks in order to prevent employment injuries as well as to provide an accident-free environment.

**3. SUPPLY CHAIN RESPONSIBILITY**

**A. Traceability:**

By investing in supply chain intelligence, we are continuing our on-going commitment to our customers to provide fully traceable and sustainable commodities. We expect our Suppliers to have in place enhanced levels of control and transparency to assist us in our commitment to provide traceability throughout the supply chain as and when required.

**B. Sustainability:**

We are committed to improving the quality of our farmers' yields, quality of product and, in turn, their income. Every local market is different, but where possible this will include: (i) engaging with farmers directly and through farmer organisations; (ii) training to improve agricultural practices, resulting in better farm management, yields and quality; (iii) certification to enable trade in higher value markets; (iv) access to better inputs and credit; and (v) access to better genetics and technologies. We expect our Suppliers to engage in and be supportive of such sustainability practices whenever possible.

#### 4. ENVIRONMENT

We are committed to improving the environments in which we operate; at a bare minimum we expect our Suppliers to comply with environmental laws, hold required permits and commit to improve environmental practices and minimise the environmental impact of their operations through, amongst others: (i) efficient use of natural resources; (ii) the responsible use of water and energy resources and maintenance of air quality; (iii) proper recycling or disposal of waste; (iv) practices to limit problems related to pesticides and deforestation.

I/We hereby acknowledge that I/we have received this code and that I/we have read and understood the same.

Name of the Entity: \_\_\_\_\_

Name of the Authorised Signatory of the Entity: \_\_\_\_\_

Signature:

Date: \_\_\_\_\_