

UCC Group Supplier Code of Conduct

1. Policy Statement

The UCC Group believe operating responsibly, ethically and with integrity are fundamental requirements to sustainable business growth and fulfilling the needs of society. This relies on our ability to

incorporate our values, behaviours and policies into our business activities and supply chains, which helps us earn trust, reduce risk and create shared value with all our stakeholders.

The UCC Group Supplier Code of Conduct ('Code') has been developed as a policy to detail our expectations to our supplier partners, who are essential to the manufacture, delivery or provision of the UCC Group products, services or Total Coffee Solution offer. The policy has been informed by several international standards and stakeholder guidance documents, including the UN Guiding Principles on Business and Human Rights, International Labour Organisation (ILO) Conventions and UK Modern Slavery Act (2015).

Operating within complex supply chains means we cannot fulfil these requirements alone. As such, this Code sets out what is expected of our supplier partners ('Suppliers') from whom the UCC Group directly purchase or contract raw materials, finished goods, equipment and services. It is applicable to all workers and employees of Suppliers (including permanent, temporary, agency labour and migrant workers) and to Suppliers' business operations which supply the UCC Group.

Through our engagement processes, the UCC Group requires our Suppliers to acknowledge and commit to this Code; respecting its provisions and working collaboratively with us to assure adherence and continuous improvements.

2. Provisions of the Code of Conduct

Compliance with national and international laws and regulations are the minimum expectation of all provisions of this Code.

In addition, the UCC Group encourage efforts beyond lawful compliance, understanding that where the provision of law, Supplier own policy and this Code address the same subject, the provision that affords the greatest protection should prevail.

Child Labour:

Suppliers shall respect and abide by the ILO Convention 138 on the Minimum Age of Employment; and ILO Convention 182 on the Worst Forms of Child Labour. Suppliers must not employ any individual under the minimum employment age according to the laws of the operating country, or, in the absence of law, under the minimum age for completing mandatory education.

Similarly, for young persons aged under 18, hazardous work or labour that potentially detracts their development, education, and welfare is strictly prohibited.

Forced Labour:

Suppliers shall ensure workers are employed on their own free will, with no worker or employee being subject to forced, involuntary or bonded labour of any kind, or as trafficked human beings, in line and as defined by ILO Convention 29 and 105, and the UK Modern Slavery Act. Employers must not withhold employees' government-issued identification, passports, work permits, property; or require workers to make financial deposits. All workers shall be free to terminate employment without penalty, given the provision of reasonable notice.

Recruitment and Employment:

Suppliers are responsible for ensuring all workers and employees possess the legal right to work and, where relevant, are in possession of a valid work permit issued by the relevant authority. Employment shall be provided based on recognized employment relationships established through national law and practice, including provision of an understandable written contract outlining terms and conditions. Any such obligations shall not be avoided through excessive use of labour only contracting, sub-contracting, apprenticeship or fix term contracts.

Working Hours:

Working hours, overtime and rest days shall comply with national law or statutory regulation, or where absent, respect the ILO Convention 1 on Hours of Work. Total working hours should not exceed those permissible by national law, and rest periods and leave entitlements should be provided and monitored.

Safe and Healthy Working Conditions:

Provision of safe and hygienic working environments should comply with national health and safety laws and respect the standards laid out in ILO Convention 155 for Occupational Health and Safety. This includes access to clean toilet facilities and potable water, provision of personal protective equipment (PPE) and employee training to reduce accidents and occupational hazards. Hazardous chemicals and other substances shall be carefully managed, and information should be made available on emergency preparedness (including exits, first aid, fire detection, suppression and associated training).

Freedom of Association:

Suppliers shall respect the rights of workers and employees to associate or not to associate with any worker organisation, or engage in collective bargaining, as permitted by and in accordance with, all applicable laws and regulations within the operating country, and respecting ILO Conventions 87 and 98.

Anti-Discrimination, Bullying and Harassment:

Suppliers shall treat workers and employees with dignity and strive to ensure equal opportunities, inclusion and diversity in the workplace, and shall not engage any form of

discrimination during recruitment or during employment. No forms of abuse or harassment should be tolerated within the workplace and towards others and Suppliers shall respect the principles of ILO Convention 111 on Discrimination and ILO Convention 190 on Violence and Harassment.

Suitable Remuneration:

Suppliers shall ensure that all workers and employees are compensated fairly, in compliance with national law or statutory regulation. In the absence of local regulation, Suppliers are required to respect the ILO Convention 100 concerning Equal Remuneration. Wages should be paid on time and within the timeframe and form agreed within the employment contract. There should not be any unreasonable wage deductions and any overtime should be agreed in advance and comply with local regulation.

Grievances:

Suppliers shall have internal mechanisms for handling reports of workplace grievances, including raising awareness and the assurance of anonymity, and they are responsible for the prompt reporting of actual or suspected violations of law. Whistle-blowers must not suffer any detrimental treatment when raising a genuine concern.

Business Integrity:

Suppliers shall comply with all laws and regulations relevant to them in the countries where they operate and supply to. This includes engaging in fair business practices, avoiding corruption (including bribery and extortion of any kind), assuring confidentiality and security of information, and disclosing information in a timely and appropriate manner.

Product Integrity:

Suppliers shall meet quality and safety standards required by the UCC Group, the regulatory environment and all applicable laws. Where possible and where requested, suppliers shall provide transparency and traceability of product and/or raw materials within their upstream supply chain.

Protecting the Environment and Respecting Communities:

Suppliers are responsible for measuring, managing and minimising the environmental impact of their operating sites, complying with all relevant laws and regulations relating to the protection of the environment. This should include (but not limited to) reducing greenhouse gas emissions, conservation of biodiversity, promoting efficient and sustainable use of raw materials and natural resources, and minimising waste and pollution. Suppliers are also encouraged to continuously improve their environmental performance and to consider the impact of their business activities on local communities and ecosystems.

3. Communication and Monitoring

Through a risk-based approach, the UCC Group will implement a process of communication and engagement, to ensure awareness and acknowledgement of our Code, and to assess and monitor adherence. Suppliers are encouraged to put in place necessary tools, record keeping and internal management systems to demonstrate efforts and progress, and the UCC Group reserves the right to assess adherence through independent third-party assessment.

The UCC Group expects our Suppliers to commit to this Code and respect its provisions. We commit to working collaboratively with our Suppliers to address any challenges this Code or its provisions may present, so we can together reduce supply chain risks and drive continuous improvement beyond lawful compliance. We also encourage our Suppliers to cascade the expectations of this Code through their supply chains.

Notwithstanding the above, the UCC Group may consider disengaging with Suppliers who cannot demonstrate to the reasonable satisfaction of the UCC Group that they can commit to, and respect the Code and its provisions, or do not take appropriate measures to remediate material issues or risks identified.

4. Policy Review

The UCC Group reserves the right to update this policy, according to changes in international standards and stakeholder guidance, through joint efforts of continuous improvement or internal the UCC Group requirements.

(We will commence to launch the "UCC Group Supplier Code of Conduct", starting with the green coffee supply business in Japan, and gradually to expand the scope to other operating companies accordingly.)