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In July 2016, Agropalma Group started its new refinery, located in Limeira Town. As processing capacity has increased by 140%, Agropalma became a buyer of crude oils and derivatives. This new scenario brings the challenge to company seeking reliable suppliers, aligned with its values and sustainability policies, as well as aligned with the expectations of its customers and other relevant stakeholders.

Since inauguration of the new refinery, some practices for searching and selection of suppliers began to be tested. Trials continued until November 2017, when company decided to develop and implement this responsible sourcing policy, whose criteria listed below apply to its own operations as well as to all suppliers of oils and derivatives.

CRITERION 1 - BUSINESS INTEGRITY


Businesses are managed with integrity and ethics, complying with the applicable local and international laws, including free market and competition protection rules. Local anti-corruption laws (where they exist) are attended and practices such as bribes and payment facilitation are prohibited. Relevant information is provided to stakeholders in accordance with applicable law and recognized corporate transparency practices in the industry, including providing information on compliance with the requirements of this policy to Agropalma Group.

CRITERION 2 – RESPECT FOR PEOPLE

Businesses, operations and activities are managed respecting people, through the commitment:

- Respect for human rights, as defined by the United Nations (UN, 1948), and worker rights, as defined by Declaration on Fundamental Principles and Rights at Work and all Core ILO Conventions
- New plantations in areas used by third parties (smallholders, traditional communities, indigenous peoples, etc.) can only be established after their free, prior and informed consent (FPIC)¹
- The use of forced labor, harassment or abuse is prohibited
- The use of child labor, as defined by the UN, is prohibited
- Freedom of organization, association and collective bargaining is assured to workers as well safe and healthy working and living conditions
- Respect Human Rights Defenders people or organizations when performing their work in a legal and regular manner
- Pay the minimum at least the wage to all workers and protect worker's right to fair working hours

¹ FPIC will be obtained by following the method of "FREE, PRIOR AND INFORMED CONSENT GUIDE FOR RSPO MEMBERS", (2015). Available on <https://rspo.org/news-and-events/announcements/free-priorand-informed-consent-guide-for-rspo-members-2015-endorsed>.

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CRITERION 3 – CONSERVATION OF FOREST, BIODIVERSITY AND CLIMATE STABILITY

New oil palm plantations will not be developed in primary forest areas, areas containing any high conservation values (HCV), areas containing high carbon stocks (HCS) or lands with peat soils of any depth. Furthermore, burning shall not be used in land preparation or any other stage of agricultural process, except in cases where it is used to control a specific pest or disease, in accordance with agronomic and best agricultural practices guidebook recommendations, if any.

CRITERION 4 - COMMITMENT TO TRACEABILITY

Implementation and monitoring of the criteria above are strictly dependent on reliable traceability. Therefore, suppliers commit to disclose the names and geographical coordinates of the extraction mills that produced the palm oil, palm kernel oil and derivatives delivered to the Agropalma refineries. In this way, Agropalma Group aims is to achieve 100% traceability to the extraction mills in the year 2020.

Agropalma Group also commits to select its suppliers considering, among others, the following requirements:

- Formal commitment to this policy
- Do not produce or source from deforested and peat-converted land after 31 December 2015
- Distance between the supplying mills and Agropalma refineries (Northeast of Para State> State of Para> Brazil> South America> Central America> Africa / Asia)
- RSPO Membership (for while it is a desirable requirement. With the evolution of RSPO in Brazil we hope to make it mandatory)

Agropalma has tested this policy for a period of 11 months since it was launched, in 03/Nov/17, and has made minor updates in its contents on 09/Oct/2018. Going through a continuous improvement process, on 20/May/2021 and then, on 03/Jun/2022 new adjustments were included.

Below, the **Annex 1** contains information on traceability and origin of the oils and derivatives processed by Agropalma refineries.

CRITERION 5 - CHANNEL FOR COMPLIANTS AND GRIEVANCES

We rely on stakeholders to help us monitor our supply chain. To do so, we provide a free telephone number *Alô Agropalma* (+55) 0800 7090 706 and also the e-mail aloagropalma@agropalma.com.br. These channels can be accessed by any interested party that wishes to report non-compliance with this policy by any of the suppliers indicated in **Annex 1**.

ANNEX 1 - Responsible Palm Oil Sourcing

Traceability of palm oil, palm kernel and by-products processed and/or marketed by the Agropalma Group refineries - 2023				
Details	Volume (ton)	% of total	% TTM	% TTP
Total oils and derivatives processed and/or sold in the two refineries	180775	100%	100%	79%
Oils and derivatives produced by Agropalma's own extraction industries used in the two refineries*	132683	73%	100%	100%
Oils and derivatives supplied by other companies to the two refineries	48091	27%	100%	13%
Quantity of oils and derivatives purchased directly from extractive industries (own and others) processed in the two refineries	138856	77%	100%	100%
Quantity of oils and derivatives purchased from intermediaries (traders and processors) in the two refineries	41919	23%	100%	0%
Traceability Belém	-	-	100%	100%
Traceability Limeira	-	-	100%	39%

*volumes sourced by company-owned mills that come from company-owned operations and third-parties

List of Agropalma Group' mills that supplies crude oils to Belem and Limeira refineries - 2023						
Country	Parent company	Mill name	Geographical Coordinates		UML ID	RSPO**
			Latitude	Longitude		
BRASIL	AGROPALMA GROUP	AMAPALMA MILL	2°31'28.39"S	48°47'51.23"W	PO1000008811	Suspended certificate
BRASIL	AGROPALMA GROUP	AGROPALMA MILL	2°32'33.82"S	48°42'19.18"W	PO100000408	Suspended certificate
BRASIL	AGROPALMA GROUP	CPA MILL	2°15'15.08"S	48°35'15.79"W	PO1000000017	RSPO Certified, IP
BRASIL	AGROPALMA GROUP	PARAPALMA MILL	2°32'36.46"S	48°42'22.49"W	PO1000004955	Suspended certificate
BRASIL	AGROPALMA GROUP	CRAI MILL	2°31'35.04"S	48°47'49.56"W	PO100000407	Suspended certificate
BRASIL	AGROPALMA GROUP	AGROPAR MILL	2°31'35.04"S	48°47'49.56"W	PO1000014803	Suspended certificate

** information based on the rspo.org website, accessed in Sep.2024.

List of extraction industries of other companies that supplied oils and derivatives to the Agopalma Group refineries in 2023/2024

Country	Parent Company	Extraction Mill	Geographic Coordinates		UML ID	Relationship	RSPO**
			Latitude	Longitude			
BRASIL	Agro Industrial Palmasa S.A.	PALMASA	-1.122556	-47.656306	PO1000008222	direto	Not RSPO Certified
COLOMBIA	EXTRACTORA MONTERREY S.A.	EXTRACTORA MONTERREY S.A.	7.29856	-73.88373	PO1000004012	indireto	RSPO Certified, IP, MB
COLOMBIA	PALMERAS DE LA COSTA S.A.	PALMERAS DE LA COSTA	10.101325	-74.0101	PO1000003031	indireto	RSPO Certified, IP
COLOMBIA	EXTRACTORA MARIA LA BAJA S.A.	EXTRACTORA MARIA LA BAJA S.A.	9.9235	-75.327607	PO1000007502	indireto	Not RSPO Certified
COLOMBIA	GRUPO OLEOFLORES	OLEOFLORES	10.097972	-73.235556	PO1000003324	indireto	Not RSPO Certified
COLOMBIA	PALMICULTORES DEL NORTE S.A.S.	PALMICULTORES DEL NORTE (PALNORTE) S.A.S.	8.53507	-72.63589	PO1000007531	indireto	Not RSPO Certified
COLOMBIA	EXTRACTORA LA GLORIA S.A.S.	EXTRACTORA LA GLORIA	8.614083	-73.680028	PO1000004753	indireto	Not RSPO Certified
COLOMBIA	PALMERAS DE PUERTO WILCHES S.A.	PALMERAS DE PUERTO WILCHES S.A.	7.339056	-73.837389	PO1000004014	indireto	Not RSPO Certified
COLOMBIA	EXTRACTORA VIZCAYAS S.A.S.	EXTRACTORA VIZCAYAS S.A.S.	7.575389	-73.950528	PO1000004016	indireto	Not RSPO Certified
COLOMBIA	PALMAGRO S.A.	PALMAGRO	9.6514	-73.56629	PO1000004025	indireto	Not RSPO Certified
COLOMBIA	ALIANZA DEL HUMEA S.A.S.	ALIANZA DEL HUMEA S.A.S.	4.269703	-72.981181	PO1000006178	indireto	RSPO Certified, IP
COLOMBIA	CI TOP S.A	EXTRACTORA SAN FERNANDO, S.A.	7.25333	-73.566361	PO1000007666	indireto	Not RSPO Certified
COLOMBIA	ENTREPALMAS S.A.S.	ENTREPALMAS S.A.S.	3.564583	-73.579412	PO1000003983	indireto	RSPO Certified, IP
COLOMBIA	EXTRACTORA DEL SUR DE CASANARE S.A.S.	EXTRACTORA DEL SUR DE CASANARE S.A.S.	4.493442	-72.844307	PO1000003177	indireto	RSPO Certified, MB
COLOMBIA	ACEITES MANUELITA	ACEITES MANUELITA S.A. (YAGUARITO)	3.882933	-73.341206	PO1000005117	indireto	RSPO Certified, MB
COLOMBIA	PALMAR DE ALTAMIRA S.A.S.	PALMAR DE ALTAMIRA S.A.S.	4.750511	-71.682461	PO1000004007	indireto	RSPO Certified, IP
COLOMBIA	PALMACEITE S.A.	PALMACEITE S.A.	10.6189	-74.1689	PO1000004029	indireto	RSPO Certified, IP
COLOMBIA	EL ROBLE S.A	EXTRACTORA EL ROBLE S.A.	10.671	-74.215165	PO1000004030	indireto	Not RSPO Certified
COLOMBIA	GUAICARAMO S.A.	GUAICARAMO S.A.	4.478556	-72.960694	PO1000004751	indireto	RSPO Certified, MB
COLOMBIA	OLEONORTE	OLEAGINOSAS DEL NORTE DE SANTANDER	8,201426	-72,551283	PO1000013892	indireto	Not RSPO Certified
COLOMBIA	EXTRACTORA SICARARE LTDA	EXTRACTORA SICARARE LTDA	9.931944	-73.262494	PO1000004026	indireto	RSPO Certified, IP, MB
INDONESIA	DHARMA SATYA NUSANTARA	PT DHARMA SATYA NUSANTARA	1.250806	116.728917	PO1000000939	indireto	RSPO Certified, IP

List of extraction industries of other companies that supplied oils and derivatives to the Agopalma Group refineries in 2023/2024

Country	Parent Company	Extraction Mill	Geographic Coordinates		UML ID	Relationship	RSPO**
			Latitude	Longitude			
INDONESIA	ASTRA AGRO LESTARI	ASTRA AGRO LESTARI 1	-1.99055	115.509267	PO1000004509	indireto	Not RSPO Certified
INDONESIA	TRIPUTRA AGRO PERSADA	SUKSES KARYA MANDIRI	-2,189397	111,342031	PO1000011196	indireto	Not RSPO Certified
INDONESIA	JAYA MANDIRI SUKSES	BANGKIRAI	-0.563446	116.373882	PO1000004857	indireto	RSPO Certified, MB
INDONESIA	CAHAYA BINTANG SAWIT SEJATI	CAHAYA BINTANG SAWIT SEJATI 1	-1.842808	116.068101	PO1000008200	indireto	Not RSPO Certified
INDONESIA	BUANA WIRASUBUR SAKTI	BUANA WIRASUBUR SAKTI	-1.886417	116.06075	PO1000004499	indireto	Not RSPO Certified
INDONESIA	BUKIT JEJER SUKSES	BUKIT JEJER SUKSES	-2,2923	121,79167	PO1000012851	indireto	Not RSPO Certified
INDONESIA	KUTAI BALIAN NAULI	KUTAI BALIAN NAULI	0.75	117.35	PO1000007638	indireto	Not RSPO Certified
INDONESIA	PT BUMI MAS AGRO (MP EVANS)	PT BUMI MAS AGRO	0,884468	118,402621	PO1000014170	indireto	Not RSPO Certified
INDONESIA	ASIA SAWIT MAKMUR JAYA	ASIA SAWIT MAKMUR	-0.485489	101.452011	PO1000004315	indireto	Not RSPO Certified
INDONESIA	BERKAT SAWIT SEJAHTERA	BERKAT SAWIT SEJAHTERA	-0.71	102.66	PO1000007652	indireto	Not RSPO Certified
INDONESIA	BUKIT SAWIT SEMESTA	BUKIT SAWIT SEMESTA	-0.344148	99.961593	PO1000008636	indireto	Not RSPO Certified
INDONESIA	DHARMASRAYA LESTARINDO	DHARMASRAYA LESTARINDO	-1.076033	101.663617	PO1000004434	indireto	Not RSPO Certified
INDONESIA	FORTIUS WAJO PERKEBUNAN	FORTIUS WAJO PERKEBUNAN	-1.050972	102.9062	PO1000008601	indireto	Not RSPO Certified
INDONESIA	GEMILANG SAWIT LESTARI	GEMILANG SAWIT LESTARI	-0.45481	101.827	PO1000007508	indireto	Not RSPO Certified
INDONESIA	GUNUNG SAWIT ABADI	KINALI	-0.046138	99.915697	PO1000008131	indireto	Not RSPO Certified
INDONESIA	INTI INDOSAWIT SUBUR	BUATAN I	0.4344444	101.825	PO1000000021	indireto	Not RSPO Certified
INDONESIA	INTI INDOSAWIT SUBUR	UKUI I	-0.2232	102.095	PO1000000148	indireto	RSPO Certified, MB
INDONESIA	KEMILAU PERMATA SAWIT	SIJUNJUNG	-0.903778	101.3981389	PO1000006186	indireto	Not RSPO Certified
INDONESIA	MITRA UNGGUL PUSAKA	SEGATI	0.141389	101.6466667	PO1000004157	indireto	Not RSPO Certified
INDONESIA	MUARA SAWIT LESTARI	MUARA SAWIT LESTARI	-2,27866	101,1636	PO1000013495	indireto	Not RSPO Certified
INDONESIA	RIGUNAS AGRI UTAMA	PERANAP	-0.584722	102.019444	PO1000002063	indireto	RSPO Certified, MB
INDONESIA	TEGUH KARSA WANALESTARI	BUNGA RAYA	0.92772	102.02125	PO1000006144	indireto	Not RSPO Certified
INDONESIA	CITRA SAWIT LESTARI	CITRA SAWIT LESTARI	2.92199	117.26464	PO1000008423	indireto	Not RSPO Certified

List of extraction industries of other companies that supplied oils and derivatives to the Agopalma Group refineries in 2023/2024

Country	Parent Company	Extraction Mill	Geographic Coordinates		UML ID	Relationship	RSPO**
			Latitude	Longitude			
INDONESIA	Eagle High Plantation	PT. JAYA MANDIRI SUKSES	-0,562775	116,37471	PO1000004857	indireto	RSPO Certified
INDONESIA	Kuala Lumpur Kepong Berhard (KLK)	PT. HUTAN HIJAU MAS	2,212121	117,167291	PO1000004533	indireto	RSPO Certified
INDONESIA	DHARMA SATYA NUSANTARA	PT DHARMA SATYA NUSANTARA	1,250833	116,72888	<u>PO1000000939</u>	indireto	RSPO Certified, MB
INDONESIA	DHARMA SATYA NUSANTARA	PT DHARMA SATYA NUSANTARA	1,25611	116,87472	<u>PO1000000950</u>	indireto	RSPO Certified, MB
INDONESIA	DHARMA SATYA NUSANTARA	PT DHARMA SATYA NUSANTARA	1,15178	116,74633	PO1000002088	indireto	RSPO Certified, MB
INDONESIA	DHARMA SATYA NUSANTARA	PT DHARMA SATYA NUSANTARA	1,28132	116,78353	<u>PO1000008654</u>	indireto	RSPO Certified, MB
INDONESIA	DHARMA SATYA NUSANTARA	PT DHARMA SATYA NUSANTARA	1,28225	116,91562	PO1000010240	indireto	RSPO Certified, MB
INDONESIA	PT DHARMA SATYA NUSANTARA	PT DHARMA INTISAWIT NUGRAHA	1,25588	116,88151	<u>PO1000014618</u>	indireto	RSPO Certified, MB
INDONESIA	PT Rantau Sinar Karsa	Tanjung Selamat	2,12889	100,00889	---	indireto	RSPO Certified, MB
INDONESIA	PT Indo Sepadan Jaya	Tanjung Selamat	2,12772	100,00271	PO1000002607	indireto	RSPO Certified, MB
INDONESIA	PT Inti Indosawit Subur	Buatan II	0,45989	101,8678	PO1000000382	indireto	RSPO Certified, MB
INDONESIA	M. P. EVANS PLC	PT PRIMA MITRAJAYA MANDIRI	-0,29771	116,76367	PO1000001488	indireto	RSPO Certified, MB
INDONESIA	M. P. EVANS PLC	PT TEGUH JAYAPRIMA ABADI	-0,20197	116,77239	PO1000012847	indireto	RSPO Certified, MB
INDONESIA	EAGLE HIGH PLANTATION	PT JAYA MANDIRI SUKSES	-0,56277	116,37471	PO1000004857	indireto	RSPO Certified, MB

**based on the UML list information, consulted in Jan.2023 (<https://www.rainforest-alliance.org/business/certification/the-universal-mill-list/>)