



SUPPLIER CODE OF CONDUCT

March 2026

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1. Introduction and Purpose

At Edelsource SA, our business is built on respect for people, for the planet, and for the communities we serve. This Supplier Code of Conduct (“the Code”) sets out our expectations for all suppliers, contractors, and business partners (“Suppliers”) who provide goods or services to Edelsource or operate within our value chains.

It reflects the principles of our Human Rights Policy and Environmental Policy, as well as the Edelsource Charter, and serves as a cornerstone of our responsible sourcing approach.

The Code is guided by international standards, including:

- [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#).
- [Universal Declarations of Human Rights](#),
- [International Bill of Human Rights](#),
- [ILO Fundamental Labour Conventions](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#).

Suppliers must comply with all applicable local, national, and international laws and strive to uphold the highest ethical, environmental, and social standards throughout their operations and supply chains.

2. Application and Scope

This Code applies to all Edelsource Suppliers, including sub-contractors, service providers, intermediaries, and agents that contribute to our products or services.

Suppliers are required to:

- Implement and maintain management systems that ensure compliance with this Code;
- Cascade these principles to their own supply chain;
- Participate in Edelsource’s due diligence and monitoring activities;
- Commit to continuous improvement and transparent communication.

3. Responsible Sourcing Pillars

Pillar 1: Human Rights and Social Practices

1.1. Child Protection and No Child Labour

Suppliers must uphold the rights of children and maintain a zero-tolerance policy toward child labour.

- No person under the age of 18 shall be employed in hazardous or inappropriate work.
- Suppliers shall align with the [ILO Minimum Age Convention \(C138\)](#) and the on the [ILO Worst Forms of Child Labour\(C182\)](#)

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- Where risks are identified, suppliers shall establish preventive and remediation systems and cooperate in root-cause solutions, including access to education and family income support.

1.2. No Forced, Bonded, or Compulsory Labour

Suppliers must prohibit all forms of forced labour, bonded labour, human trafficking, and other involuntary work.

- Workers must have freedom of movement and the right to leave employment with reasonable notice.
- Confiscation of identity documents, deposits, or wages is strictly prohibited.
- Practices must align with ILO Conventions Forced Labour Convention (C29). and ILO Abolition of Forced Labour Convention (C105).

1.3. Freedom of Association and Collective Bargaining

- Suppliers shall respect the rights of workers to freely form or join trade unions and to engage in collective bargaining in line with ILO Convention 98 Right to Organize and Collective Bargaining
- No worker shall be discriminated against or harassed for participating in union activities.

1.4. Fair Wages and Working Hours

Suppliers shall:

- Provide fair and competitive wages that meet or exceed legal and industry standards, ensuring a living wage sufficient for a decent standard of living;
- Comply with legal limits on working hours, rest periods, and overtime;
- Prohibit wage deductions as a disciplinary measure.

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1.5. Diversity, Inclusion, and Non-Discrimination

Suppliers shall promote equal opportunity and prevent any form of discrimination or harassment based on race, gender, age, nationality, disability, sexual orientation, religion, political belief, or other protected status.

- All workers shall be treated with dignity and respect.
- Gender equity and inclusion shall be actively promoted across operations.

1.6. Health, Safety, and Well-being

Suppliers must provide a safe, hygienic, and healthy workplace.

- Align practices with ILO Convention C155 on Occupational Safety and Health.
- Identify and mitigate workplace risks.
- Provide clean water, sanitation, and adequate accommodation (where applicable).
- Deliver regular and documented safety training.

1.7. Indigenous Communities and Land Rights

Suppliers shall respect the rights, culture, and territories of Indigenous Peoples and local communities, ensuring Free, Prior, and Informed Consent (FPIC) before activities that may affect them.

Pillar 2: Environmental Protection and Sustainability

EdelSource recognizes the interdependence of human rights and environmental protection. Suppliers are expected to operate in a manner that safeguards ecosystems, natural resources, and climate stability.

2.1. Climate Action

Suppliers shall monitor and reduce greenhouse gas emissions and align with global climate goals.

- Encourage adoption of Climate-Smart Agriculture and low-carbon practices.

2.2. Deforestation and Land Use

EdelSource enforces a No Deforestation, No Conversion policy. Suppliers must not contribute to deforestation or conversion of natural ecosystems after the applicable cut-off dates (e.g., 1 January 2014 for cocoa and coffee).

- Farms must not operate in protected or high conservation value areas.
- Suppliers shall maintain farm maps and provide evidence of compliance upon request.

2.3. Biodiversity

Suppliers must protect biodiversity and take extra precautions near protected or sensitive ecosystems. Encourage agroforestry, reforestation, and biodiversity-friendly practices.

2.4. Soil, Water, and Waste Management

Suppliers shall:

- Prevent soil erosion and contamination;
- Protect water resources from pollutants and manage water efficiently;
- Minimize waste and promote recycling and circular economy practices.

2.5. Chemical and Pesticide Management

- Prohibit use of WHO Class 1a and 1b pesticides;
- Promote Integrated Pest Management (IPM) and safe handling procedures;
- Reduce chemical inputs to protect farmer and community health.

2.6. Energy Efficiency and Resource Use

Suppliers shall continuously improve energy efficiency and favor renewable sources.

2.7. Environmental Due Diligence and Restoration

Suppliers must adopt risk-based environmental due diligence and implement remediation when harm occurs, consistent with the Accountability Framework.

Pillar 3: Supplier Transparency and Collaboration

3.1. Traceability and Data Management

Suppliers must actively ensure traceability of raw materials and provide transparent data on sourcing, production, and risk management.

Supplier shall :

- ensure the identification of the origins of the commodities
- and enable traceability ideally up to the farmer or up to the parcel;
- record traceability data for five years and provide the information upon request

3.2. Management Systems

Suppliers must implement internal systems, including policies, procedures, and training, to manage the three pillars of this Code effectively.

3.3. Continuous Improvement and Collaboration

Edelsource works with suppliers through capacity building, shared learning, and improvement plans. Persistent non-compliance without engagement may result in termination of the business relationship.

3.4 Governance, Monitoring, and Reporting

Edelsource regularly reviews supplier performance through risk assessments, audits, and site visits. We encourage suppliers to demonstrate progress via certifications (e.g., Rainforest Alliance, Fairtrade, Organic), verifiable data, and transparent reporting.

3.5 Raising Concerns & Grievance Mechanism

Suppliers, employees, and stakeholders are encouraged to report ethical, environmental, or human rights concerns via the Edelsource Grievance Mechanism, available on our website. Reports will be treated confidentially, and whistleblowers are protected from retaliation.

Suppliers are also expected to raise awareness of the grievance mechanism within their own supply chains and ensure that it is accessible to relevant stakeholders, including farmers and local communities. This includes communicating information about the mechanism through appropriate channels and formats so that individuals at the farm level understand how to raise concerns safely and effectively.

In addition, Edelsource actively encourages all stakeholders to share their views on the Code and related policies. Stakeholder feedback is considered an essential part of our continuous improvement process.

Pillar 4: Compliance and Business Integrity

4.1 Legal Compliance

Suppliers shall:

1. Comply with all laws and regulations applicable in the countries in which they operate, including those governing labour, human rights, environment, health and safety, trade, taxation, and data protection.
2. Obtain and maintain all necessary registrations, licenses, and permits required for their operations.
3. Be committed to continuous improvement, striving to go beyond minimum legal requirements where higher ethical or sustainability standards are necessary to protect people and the planet.

4.2 Anti-Corruption and Anti-Bribery

Edelsource maintains zero tolerance for any form of corruption, bribery, or unethical influence. Suppliers shall:

1. Comply with all applicable anti-bribery and anti-corruption laws, including the OECD Anti-Bribery Convention and relevant local legislation.
2. Not offer, give, solicit, or accept bribes, kickbacks, facilitation payments, or any form of improper advantage, whether directly or indirectly, to influence a business decision.
3. Avoid using gifts, entertainment, or hospitality as a means to improperly influence or reward business relationships. Modest gifts or hospitality may be offered or accepted only when lawful, customary, and transparent.
4. Establish and communicate an anti-corruption policy to employees and business partners, with regular training and reporting mechanisms in place.

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4.3 Prevention of Conflicts of Interest

Suppliers shall:

1. Comply with all applicable laws regarding conflicts of interest and take steps to identify, disclose, and manage any situation that could compromise impartiality or objectivity in business dealings with Edelsource.
2. Immediately inform Edelsource if an actual or potential conflict of interest arises within their organization or its affiliates.

Supplier Declaration

By signing this document, the undersigned hereby acknowledges and agrees that:

1. The undersigned has received, read, and understood the Edelsource Supplier Code of Conduct and undertakes to comply with its provisions and ensure its implementation across all operations and throughout its supply chain.
2. The undersigned agrees that Edelsource SA, or any third party duly appointed by Edelsource SA, shall have the right to conduct periodic and unannounced inspections, audits, or assessments in order to verify compliance with the provisions of the Code.
3. The undersigned undertakes to communicate the contents of the Code effectively to its employees, agents, subcontractors, and any other relevant business partners, and to exercise appropriate due diligence to ensure adherence to and implementation of the Code.

Supplier Name: _____

Supplier Address: _____

Authorized Representative: _____

Title: _____

Place, Date: _____

Signature: _____