



Responsible Sourcing Policy

This document describes ED&F Man Commodities Group's Responsible Sourcing Policy. It applies to all businesses within the Commodities Group.

This document should be read and executed in compliance with the ED&F Man Commodities Group Standards of Business Conduct.

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1. Introduction	3
2. Application and scope	4
3. Mandatory requirements and commitment	4
a. Environment	4
b. Social	5
c. Governance	7
4. Implementation and adherence	8
5. Continuous improvement	9
6. Grievance	10
7. Additional resources	10

1. Introduction

At ED&F Man Commodities, we recognise the impact our operations have on the global economy, society, and the environment. As one of the world's leading providers of soft commodities and a vital link in the global food supply chain, trading continuously since 1783, we source, store, process, ship and distribute a range of products including sugar, coffee, molasses, animal feed, and fish oils. We understand the responsibility that comes with our role in the global supply chain. The Responsible Sourcing Policy embodies our commitment to have a positive impact within our supply chains and on the communities and environments in which we operate. It is integral to who we are and how we do business.

As an agricultural commodity trader, we rely on trust-based partnerships to strengthen our supply chains and the businesses within them. Although we acknowledge the complexity of managing supply chains at this scale, we expect our suppliers to uphold our commitment to responsible business practices by adhering to our policies. Where feasible, we leverage our partnerships to advance these commitments together and strive to make a positive impact on both the communities we are involved in and on the planet.

2. Application and scope

This Responsible Sourcing Policy serves as the foundation for all ED&F Man's commodities business units. Given the diverse supplier landscapes of each business unit, we have decided to pursue tailored supplier adherence strategies for each division. Nevertheless, this Policy outlines the principles and standards that all suppliers must adhere to. It is a list of prerequisites that all our suppliers must fulfil to conduct business with ED&F Man Commodities. Beyond the mandatory requirements, we encourage all of our suppliers to improve their practices and sustain the advances they make.

This Policy applies to all our suppliers. A "supplier" is defined as any individual or company that provides us with at least 20 metric tonnes annually of coffee, sugar, molasses, liquid products and other products that we trade. This includes suppliers of raw materials, ingredients, finished goods, and intermediaries (such as other traders), and service providers, but excludes trades on the exchange¹.

3. Mandatory requirements and commitments

The following requirements are applicable to all suppliers and are in line with internationally recognised standards. As a prerequisite, we expect all suppliers to act in a manner consistent with our Supplier Code of Conduct, in which we define our business standards and principles as rules of ethical behaviour for all our suppliers, and throughout their supply chains.

¹ We trade coffee and sugar via the respective exchanges. The exchange is a marketplace where futures and options contracts are traded. These exchanges facilitate the buying and selling of sugar and coffee as a commodity, helping to establish a standardized price and providing a mechanism for hedging against price fluctuations. Trades are typically conducted anonymously, which makes it difficult to trace the supply chain and is the reason why we exclude trades on the exchange for this Policy.

a. Environment

Environmental management

Suppliers shall comply with all applicable environmental regulations and hold all required permits and licenses. Suppliers shall operate in a responsible manner and be committed to the efficient use of raw materials, energy, water, and other natural resources whilst minimising waste, emissions, and noise.

Land use change, deforestation and biodiversity

Suppliers shall operate using practices that: comply with local regulations; avoid deforestation and land use change; protect against conversion of natural and critical habitats; and preserve biodiversity.

Suppliers should minimise negative impacts on the environment – particularly on climate, nature, and biodiversity – and implement measures to protect soil and water bodies. Suppliers will use natural resources sustainably and must ensure that their operations do not directly contribute to deforestation or loss of biodiversity. Suppliers must conduct due diligence on commodities grown on land which may be associated with deforestation in their supply chains. We encourage suppliers to implement projects with a positive impact on nature.

b. Social

The below social paragraphs shall apply to all labour, whether under contract, seasonal, or migrant.

Human rights

Suppliers shall comply with the UN Universal Declaration of Human Rights and International Labour Organisation (ILO) core labour standards and conventions.

Suppliers shall support and respect the protection of internationally proclaimed human rights. Employees shall not be required to surrender passports (or other legal identification documents), or pay a fee before commencing work.

Child labour, forced labour, protection of youth, and human trafficking

Suppliers shall not cause, contribute to, or associate with human rights abuses, modern slavery, or human trafficking. Employment shall be freely chosen (not be forced, bonded, indentured, or in any other involuntary forms of labour (e.g. prison)). We respect the ILO convention on child labour and children's rights to an education. Suppliers shall not use child labour - no one below the age of 15 can be employed. Any employment of people under age 18 shall occur in compliance with local law, UN guidelines, and ILO conventions where they may only perform 'light work' and must be properly supervised, and their work must not interfere with their physical health or moral development.

In addition, suppliers may not engage in, or benefit from, the use of child labour or forced labour (as described above) outside their own organisations.

Working conditions

Suppliers shall comply with local working time regulations and wage laws, including mandated benefits, and shall pay their staff at least minimum wages, including overtime.

Suppliers shall allow freedom of association and the right to collective bargaining and shall operate a mechanism to report grievances.

Diversity, respect in the workplace, equal treatment

The workplace shall be free from harsh and inhumane treatment, or the threat thereof, including (sexual) harassment, abuse, punishment, coercion, and discrimination – regardless of age, nationality, race, social or ethnic origin, colour, gender, gender identity or expression, marital status, sexual orientation, disability, medical history, pregnancy status, religion, political opinion, union affiliation, or veteran status.

Suppliers are likewise required to hire, employ, and advance employees solely based on the qualifications and capabilities necessary to carry out the work.

Health and safety

Suppliers shall adhere to local health and safety laws, shall provide a safe and healthy workplace with access to potable water and sanitary facilities and, if applicable, safe and hygienic company-provided living quarters. Operations, processes, and equipment shall be safe, and the risks of accidents or injury shall be actively minimised.

Land rights and free, prior and informed consent

Where applicable, suppliers shall operate responsible land tenure governance, respect the legal and customary land rights of local and indigenous populations, and obtain Free, Prior and Informed Consent (FPIC) from such groups for the use of their land.

Communities

We and our suppliers acknowledge and honour the human rights of individuals in communities affected by our operations, recognising the importance of addressing the needs of vulnerable and marginalised groups. We expect our suppliers to interact with their communities consistently and methodically through stakeholder discussions, aiming to gain a deeper understanding of local concerns and potential impacts on communities.

c. Governance

Compliance with the law

In providing products and/or services to ED&F Man, suppliers shall comply with all applicable laws and regulations to ensure a legal operation. All suppliers are expected to adhere to these, and management is responsible for ensuring compliance.

Money laundering, bribery and corruption

Suppliers shall operate ethically, in compliance with antitrust laws and applicable sanction regimes, and shall not be engaged in bribery, corruption, money laundering, tax evasion, or other fraudulent practices.

Fair competition

Suppliers must adhere to a fair and competitive market environment and comply with both the explicit terms and the underlying principles of relevant antitrust, competition, and trade practice regulations.

Reporting

Suppliers should establish whistleblowing procedures to handle integrity concerns within their operations, encompassing issues such as bribery and corruption. These systems should enable employees to report compliance issues confidentially and without fear of reprisal.

4. Implementation and adherence

ED&F Man Commodities aims to cultivate trust-based partnerships with ethical suppliers and business associates that align with our Supplier Code of Conduct. In pursuit of this objective, we employ a risk-based due diligence strategy to educate our suppliers and verify compliance with the provisions outlined in this Policy.

Suppliers are evaluated through due diligence checks, which are conducted and reviewed by the management of each ED&F Man business unit. ED&F Man will only work with those suppliers approved through this process. We aim to ensure that all ED&F Man suppliers adhere to this Policy, through fulfilling the following expectations:

- 1. We expect our Suppliers to affirm our mandatory requirements and actively respond to our reasonable inquiries regarding implementation of, and adherence to, this Policy.*

2. *We expect all Suppliers to implement mechanisms to identify, assess, and manage risks in the areas addressed by this Policy.*
3. *We expect all Suppliers to be able to demonstrate compliance by retaining adequate documentation.*
4. *We expect our Suppliers to communicate the requirements of this Policy through their supply chains back to the primary production level, to ensure all parties in the supply chain also comply with the principles set out in the Policy.*
5. *We expect our Suppliers to proactively inform us in case of a breach of any of the above elements.*

By the end of 2025, we aspire to have all our suppliers signed up to our Supplier Code of Conduct. As new suppliers are added every year, this will be an ongoing process. Additionally, we will be actively conducting commodity-specific supply chain risk assessments and have established escalation strategies for any alleged or verified supplier misconduct within each business unit. Any awareness of non-compliance with this Policy by a supplier should be promptly reported to ED&F Man Commodities, through our Speak Up mechanism (details below). If suppliers are found to be non-compliant with the Policy, we expect immediate actions to be taken to remedy the non-compliance. If such remedial action is not taken when requested it may ultimately lead to a decision by ED&F Man to discontinue business with those suppliers.

The principles of this Policy are based on supplier engagement, through dialogue, mutual trust and collaboration. It is our philosophy to work together with our suppliers to promote transparency of practices and the application of the standards in this Policy, throughout the supply chain.

5. Continuous Improvement

We expect all our suppliers to engage with us in a cycle of continuous improvement and to verify their own responsible sourcing processes and practices remain in line with this Policy. Where possible, ED&F Man Commodities aims to provide support to suppliers in this cycle, with a view to achieving positive outcomes in all interventions.

ED&F Man Commodities will ensure that this Policy is evaluated and amended where necessary. We will never compromise our values, and will ensure that this Policy reflects supplier and customer feedback, as well as societal challenges and changes in the legal landscape over time. We will revisit this Policy on a regular basis, and at least once every three years, to continuously improve our contribution to the development of sustainable supply chains.

6. Grievance

We encourage people to speak up if they see any behaviour that violates any laws or regulations, or our own internal Policies, values, and behaviours. To anonymously report a concern visit: <https://edfman.speakup.report/edfman>. For clarity, this site is available for the use of both our employees and those of our suppliers or service providers.

7. Additional resources

- [Sustainability Report](#)
- [Supplier Code of Conduct](#)
- [Standards of Business Conduct](#)
- [UK Modern Slavery Act](#)
- [United Nations Sustainable Development Goals](#)
- [International Labour Organization Standards](#)