



SOCFINDO - SUPPLIER CODE OF ETHICS  
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## INTRODUCTION

Socfindo is a subsidiary of the multinational company Socfin S.A., active in Africa and Asia in the field of tropical plantations, mainly for the production and marketing of natural rubber and palm oil.

Socfin S.A. published its first Code of Ethics in December 2009.

Following regulatory monitoring and the adoption on 22 March 2017 by the Board of Directors of Socfin S.A. of a new responsible management policy, the Code of Ethics of Socfin S.A. and its subsidiaries was updated. It now consists of two parts: the "Employee and Corporate Code of Ethics" and the "Supplier Code of Ethics". These two codes are intended to support Socfin S.A.'s commitments in terms of corporate social responsibility, and in particular those listed in ISO 26000 under § 4.4 "Ethical behaviour" and § 6.6 "Fairness of practices". They are part of the United Nations Convention against Corruption of 31 October 2003 (Article 12) and are intended, where applicable, to satisfy indicator 1.3.1 of the RSPO.

Socfindo expects its suppliers to act with the same ethics and, at the same time, not to interfere, directly or indirectly, with the ethical conduct of Socfindo employees.

## OBJECTIVES

The purpose of this Socfindo Supplier Code of Ethics is to implement practices in accordance with generally accepted ethical standards in the Socfindo supply chain.

Each supplier of goods or services must undertake to respect all the principles and put them into practice. The Supplier Code of Ethics therefore allows everyone to evaluate the decisions to be made according to the ethical principles valid for the entire Socfindo supply chain.

## APPLICATION OF THE CODE TO PERSONS OTHER THAN SOCFINDO'S SUPPLIERS

This Code of Ethics is reserved for Socfindo's suppliers of goods and services. However, the ethical principles are valid throughout Socfindo's supply chain and, therefore, also to Socfindo's supplier's own subcontractors.

In the text below, the term "supplier" is to be understood as: the supplier as a legal person, its officers and employees.

## RECORDS AND ACCOUNTING DOCUMENTS

All financial transactions must be properly recorded in the accounting records and accounting procedures must be subject to necessary internal controls. In addition, all records and accounting documents of the supplier must be available for verification, in accordance with the law.

Where there is reason to believe that there has been a violation of financial principles that may directly or indirectly affect the business of Socfindo or himself, this situation must be reported and investigated.

## COMPETITION ISSUES

The supplier and Socfindo must act independently and in their own interest in any commercial situation affecting competition on the markets and refrain from practices that restrict competition.

It is everyone's responsibility to comply with the spirit and letter of the competition laws applicable to the supplier. Whenever there is any doubt about a competitively sensitive file, it should be reported to your supervisor and Socfindo.

## **CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY**

Socfindo's confidential information includes technical information about its products or processes, lists of suppliers or selling prices, cost, pricing, marketing or service strategies, non-public financial reports, any information relating to transfers, mergers and acquisitions and certain employee personal information (individual hiring or medical records). In addition, the assembly of public domain information to obtain specific results is often a valuable trade secret.

Intellectual property includes patents, copyrights, trademarks, trade secrets, photos, videos, graphics, icons, logos, publications, flyers and other communication elements. The law confers certain rights on the holders of intellectual property.

Confidential information, including intellectual property information, is an important asset that a competitor could benefit from if known or whose public dissemination could harm Socfindo.

If the supplier inadvertently has access to this type of information, he may not disclose it to unauthorized persons, inside or outside the Socfin Group.

The supplier must also ensure to protect the confidentiality of any information, in any form whatsoever, received from an employee of any subsidiary of the Socfin Group or Socfindo, when confidentiality has been notified in writing or orally.

Confidential information may be protected by law as a trade secret if it represents value to third parties and if its owner takes appropriate measures to protect it.

It is always necessary to protect the confidential information of Socfindo, the Socfin Group and their employees; it is also necessary to protect intellectual property rights, while ensuring that the rights of others in this field are respected. Any unauthorized use of the intellectual property of Socfindo or others must be reported to his hierarchy and to Socfindo. Any disclosure of confidential information received from a third party or other supplier must be reported to its management and to Socfindo, if such information may be used indirectly in connection with its supplies of goods or services to Socfindo.

## **CONFLICTS OF INTEREST**

It is essential that suppliers are free, or disclose, any commitment or relationship that could create a conflict of interest with Socfindo.

A conflict of interest may arise when a supplier has a direct or indirect personal interest in a decision being made and that decision should be made objectively, without bias and in the best interest of Socfindo. It is important to avoid even the appearance of a conflict of interest.

Each supplier who believes he or she has a potential conflict of interest must immediately disclose all relevant details to his or her supervisor and Socfindo.

Any situation or activity that may represent a conflict of interest for a supplier may also represent a conflict of interest if it is a family member or a third party who obtains an advantage on its behalf. Discretion must be exercised to avoid any perception of improper practice or conflict of interest.

In addition, if a supplier has interests in other matters that may influence his performance at work, through the time and attention he devotes to it during working hours, this is considered a conflict of interest.

## **DRUGS, ALCOHOL AND FIREARMS**

It is prohibited to possess or use illegal drugs in Socfindo's workplaces. It is essential that the supplier has a clear judgment at all times that is not impaired by drugs or alcohol. Driving a means of transport (vehicle, motorcycle, truck, etc.) under the influence of alcohol or drugs is strictly prohibited. Firearms are only permitted in circumstances expressly authorized by Socfindo's management and in accordance with local legislation.

## **USE OF E-MAIL AND THE INTERNET**

Access to the Internet and e-mail is provided mainly for professional purposes. E-mail is not entirely secure and can be intercepted and permanently recorded. Any email you send (on behalf of Socfindo, or on your behalf using Socfindo's means of communication) can be printed by the recipient and forwarded to others, and then probably stored on the computers of those recipients for a fairly long period of time. Therefore, the supplier must use the same precautions and conventions to send an email as in their normal written business communications.

With regard to any Internet connection made available to it by Socfindo, the supplier must comply with local usage procedures, adapted to the available technical configurations (bandwidth), and must not download data that is unprofessional, illegal or inappropriate for business. In addition, the use of an Internet provider can be monitored (in accordance with local legislation).

## **USE OF SOCFINDO'S ASSETS**

Socfindo's property is reserved for its own use.

The supplier cannot:

- 1. obtain, use or misappropriate Socfindo's property for his or her personal use or benefit;**
- 2. transform or destroy Socfindo's property without proper authorization;**
- 3. remove the goods or use the services of Socfindo without the prior authorization of Socfindo's management.**

Some activities may have benefits for Socfindo but also for the supplier who performs them, and the distinction between the two may be difficult to establish. Therefore, it is important that Socfindo allow the supplier to use Socfindo's goods or services in advance if such use does not benefit only Socfindo.

Any case of fraud or alleged theft by a supplier or third parties must be reported.

## **ENVIRONMENT, HEALTH AND SAFETY**

One of Socfindo's objectives is to protect the environment, health and safety (EHS) of its employees, suppliers of goods and services (operating in its infrastructure) and the local communities in which Socfindo operates, and to promote appropriate practices in this regard.

Socfindo's EHS (or HSE, hygiene, health and safety) policy includes the objectives and responsibilities of each individual and must be respected by the supplier.

## GOVERNMENT RELATIONS

In the conduct of Socfindo's business, government relations include all contacts with governments, their agencies and representatives. Many Socfindo employees interact regularly with government agencies in accordance with established practices and procedures. There is only one way for Socfindo employees to do this: to conduct themselves according to the highest ethical standards in all transactions with governments.

Socfindo expects its suppliers to do the same and, at the same time, not to hinder the ethical behaviour of Socfindo employees.

Any legitimate request for information from government authorities must be met. Nevertheless, and if necessary, Socfindo's fundamental legal rights must be asserted. Therefore, if a government authority asks the supplier for information or access to files belonging to Socfindo, it must be answered that its request will first be submitted to Socfindo's management. However, if, for example, the representative of the government authority, such as a police officer, has a search warrant, the supplier must comply immediately and contact a Socfindo official without delay. The supplier must not destroy Socfindo's documents under any circumstances without the agreement of Socfindo's management.

Before transmitting information to a government authority, the supplier must refer the information to Socfindo management, which will take appropriate measures to protect its confidentiality.

The supplier shall not use the services of an official except under a written contract with the administration, which specifies the nature of the services to be provided. Care must be taken to ensure that the service provided cannot be misinterpreted as a means of paying an unlawful sum. In some countries, the hiring of an official for any work is prohibited.

Invitations to government officials should be limited so as not to damage - or appear to damage - the reputation of these officials or Socfindo in any way.

## HUMAN RIGHTS AND THE WORKPLACE

In many ways, our workplace is our second home, where we are all entitled to respect. Respect is essential to a harmonious working environment where workers' rights are respected, their dignity is indisputable and they are free from intimidation, discrimination or coercion of any kind.

The supplier:

1. strives to maintain a workplace in which the dignity of individuals is respected;
2. does not allow discrimination or harassment on grounds such as race, sex, national origin or religious beliefs, or any other personal characteristic that is subject to legal protection;
3. does not approve of the use of inappropriate language at work, including swearing, profanity or insults;
4. does not allow coercion or intimidation in the workplace;
5. does not use his/her hierarchical authority to extort money or obtain favours from other co-workers;
6. is categorically opposed to child labour and forced labour.

The supplier respects the rights of employees to organise and bargain collectively, even if national laws do not provide for this.

## **PAYMENTS OF ILLICIT SUMS**

The supplier may not offer unlawful sums in its own name or in the name of Socfindo.

The supplier and Socfindo shall refrain from directly or indirectly paying compensation in cash, goods, services or any other form to a representative of the State or a political party, a candidate in an election or a political party to persuade the beneficiary:

- 1. to use its influence to help the Company or**
- 2. not to do his duty.**

If the supplier is aware of or has doubts about the legitimacy of a payment, he must refer it to his hierarchy or to Socfindo.

## **MONEY LAUNDERING**

The Socfin Group and Socfindo are committed to the fight against money laundering. Any proposal to invest in its activities must be the subject of a detailed investigation into the origin of the funds and the identity of the investor. Similarly, the supplier will refrain from accepting large investments in cash without investigation, and if necessary, will report them to Socfindo.

## **BUSINESS TRANSACTIONS**

Demonstrating the highest degree of integrity in all aspects of Socfindo's business and conducting it fairly is part of Socfindo's policy.

Socfindo expects its suppliers to do the same and, at the same time, not to hinder the ethical behaviour of Socfindo employees.

This guiding principle also governs the sale or purchase of both services (for example, banking services, consulting services, advertising services, technical services or maintenance services) and products or goods.

In the case of purchases, the supplier must choose his own suppliers fairly, based on criteria of quality, price and service provided, and giving priority, all other things being equal, to a local supplier.

With regard to the supply chain for palm fruit or rubber from smallholders, the supplier does not use its position of strength to unilaterally impose or change the terms of purchase contracts or to impose irrational clauses; it scrupulously and transparently follows national or sectoral pricing regulations and maximizes its influence to ensure that prices paid by the sector to smallholders remain at a sufficiently high level to guarantee them a decent income. Any benefits related to the quality or sustainability of Socfindo productions (e.g. premiums for RSPO certified palm oil) must be refunded to smallholders in proportion to their contribution and in full transparency. The supplier will ensure this and will be subject to verification by Socfindo.

In the case of sales or marketing, the supplier must:

1. provide precise, complete, accurate and verifiable information on the quality, quantities and delivery times of products intended for Socfindo;
2. establish, in a clear and concise manner, all price estimates and delivery date forecasts;
3. never make or receive improper payments or gifts in their dealings with anyone related to the sale or purchase of products or services, even at the cost of lost business opportunities;
4. be aware of its responsibility for the products and, if necessary, warn Socfindo and all its customers in general of the dangers that may be involved in the products sold.

## **POLITICAL WORK**

The general principle is that Socfindo or its employees avoid participating in or organizing political activities on behalf of Socfindo on Socfindo 's dealership. However, Socfindo recognizes the right of everyone to express their political convictions and to debate them as a citizen.

The supplier may not organize any political activity on the Socfindo concession without the express authorization of Socfindo's management.

The supplier may not use Socfindo's facilities for the preparation of a political demonstration, including Socfindo's telephone lines or the assistance of Socfindo staff to establish contacts or prepare political documents.

## **SECURITIES LAWS AND INSIDER TRADING**

Employees must refrain from buying or selling Socfindo securities, products or raw materials when they are in possession of inside information about Socfindo that has not been disclosed to the public. They must also refrain from disclosing this information to third parties.

If the supplier receives this information, even inadvertently, he must inform Socfindo's management and not forward it to other third parties.

The term "non-public inside information" refers to fairly significant information that is not known to the public and whose dissemination could influence the price of any of the Socfin Group's securities (for example, shares or bonds).

## **SEXUAL HARASSMENT, WORKPLACE HARASSMENT AND VIOLENCE**

Sexual harassment may include advances of a sexual nature, sexual jokes, subtle or blatant pressure to obtain sexual favours, and references or proposals that are offensive. The supplier will not tolerate sexual harassment. Sexual harassment is considered to be an act of a sexual nature that risks, for example:

1. create an intimidating, hostile or offensive work environment,
2. interfere with an employee's performance or,
3. interfere with employment or advancement opportunities.

The supplier does not accept harassment or violence in the workplace. For example, it prohibits threats, intimidation, bullying, humiliation or gratuitous exclusion.

The supplier must report such behaviour, as well as any concerns related to harassment, particularly concerning his or her personal safety or that of his or her colleagues to his or her hierarchy and to Socfindo.

The supplier must also report such conduct if it occurs among Socfindo employees.

If Socfindo has evidence or is satisfied that the allegations are true, Socfindo will take necessary action against the persons concerned, which may include dismissing the employee or terminating the supply contract, as the case may be.

## SHAREHOLDER, MEDIA AND COMMUNITY RELATIONS

The supplier, even if solicited, does not communicate on behalf of Socfindo and does not disclose any information about Socfindo without having been authorized by Socfindo's management.

## SAFETY IN THE WORKPLACE

Socfindo is committed to ensuring the safety of its employees and property. Subject to the provisions of local laws, and without prejudice to human rights as proclaimed in particular in the Universal Declaration of Human Rights, Socfindo's representatives and security personnel are authorized to conduct searches of persons, vehicles or property on Socfindo's premises.

The supplier must cooperate and allow any search of his person or property on Socfindo's premises.

## CODE COMPLIANCE

All Socfindo suppliers must act in accordance with the Code and actively defend its values and principles.

It is the responsibility of Socfindo to:

- 1. communicate the values and principles of the Code, applicable policies, procedures and practices, so that suppliers are fully aware of them;**
- 2. take positive actions in advance to avoid violations of the values and principles described in this Code;**
- 3. ensure adequate information on the whistleblowing procedure (including anonymously), protect the identity of individuals reporting alleged violations, and ensure their protection and safety to avoid reprisals.**

Any supplier shall do the same for its employees, its own suppliers and subcontractors.

Any supplier who does not comply with the provisions of the Code of Ethics, or who conceals information during an investigation concerning a possible breach of these provisions, may be subject to the termination of its supply contract.

Depending on the nature of the offence, Socfindo may have a legal obligation to report it to the appropriate authorities.

Breaches of the Code of Ethics must be reported immediately in accordance with the whistleblowing procedure.

No retaliatory action will be taken against anyone who has reported an offence in good faith. However, any supplier who has participated in a prohibited activity may be terminated even if he reports the violation.

## **SCOPE OF THE CODE**

The rules of conduct set out in the Suppliers' Code of Ethics are not exhaustive, but complement the general regulations governing the conduct of workers within Socfindo.

## **CHECKING**

Compliance with the rules of conduct set out in this Code of Ethics will be regularly verified by YYYY (Compliance officer).

**Adopted by PT Socfindo  
in March 2019**