



Wilmar Sugar respects the communities in which we operate and those from which we source raw materials, products, services and various supplies (**Suppliers**). This Supplier Code (**Code**) provides a set of conditions to support our goal to purchase supplies that are produced in a socially responsible and environmentally sustainable manner. The Code aims to ensure that all interactions between Wilmar Sugar and our Suppliers happen with the appropriate standards of behaviour, integrity and ethics and in accordance with our values. Wilmar Sugar's values are integrity, excellence, passion, innovation, teamwork and safety. Wilmar Sugar has a firm commitment to behaving honestly, fairly and openly when dealing with Suppliers, customers and other stakeholders.

The standards we set for our Suppliers are at the same level we expect of all Wilmar Sugar employees. All Wilmar Sugar Suppliers are required to comply with the Code including advising Wilmar Sugar of any concerns with our employees, activities or conduct. This Code is supplementary to any agreement or arrangement between a Supplier and Wilmar Sugar, and it is the responsibility of the Supplier to ensure compliance with this Code.

We also expect our Suppliers to be able to verify that any third party they engage in the process of manufacturing goods or providing services for Wilmar Sugar, or on our behalf, operates in a manner consistent with this Code.

In this Code, **Wilmar Sugar** means Wilmar Australia Holdings Pty Limited and each of the entities it owns or controls including (among others) Wilmar Sugar Australia Limited, Wilmar Sugar Pty Ltd, Wilmar BioEthanol (Australia) Pty Ltd, Wilmar Ingredients (Australia) Pty Ltd, Sugar Australia Pty Ltd and New Zealand Sugar Company Limited.

The Wilmar Sugar Supplier Code may change from time to time to reflect our commitment to continually improving our approach to socially responsible and environmentally sustainable sourcing.

## By becoming a Supplier of Wilmar Sugar, the Supplier agrees to:

### 1. Act lawfully and with integrity

Act lawfully and with integrity by:

- Acting honestly, fairly and ethically in all business dealings with Wilmar Sugar.
- Conducting their business in accordance with all applicable laws and regulations, including relevant national, as well as applicable international laws and regulations relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and anti-trust/competition laws. Where a local law or other applicable standards set higher standards than those set out in this Code, these take precedence and must be adhered to.

### 2. Respect human rights

Ensure no exploitation of human rights within their operations by:

- **Child labour** – ensuring child labour is strictly prohibited in its operations and supply chain. The Supplier will ensure strong age-verification processes are in place during recruitment and establish processes, systems and controls to identify child labour practices and implement remedial actions in the case that child

labour is uncovered to ensure appropriate follow-up on, and assistance for, protection of the child's welfare.

- **Forced and bonded labour** - Not knowingly using or promoting the use of forced or bonded labour or human trafficking, and taking appropriate measures to prevent the use of such labour in connection with their activities. The Supplier will employ remedial actions in the case that such labour or trafficking is uncovered to ensure that victims are referred to existing services for support and assistance.
- **Ethical recruitment** - Ensuring ethical recruitment such that workers do not incur any recruitment fees at any stage of the recruitment process and only workers with a legal right to work shall be employed or used by the Supplier. This requirement holds regardless of whether workers are engaged through another third party.
- **No unlawful document retention** - Ensuring that workers are not required to provide monetary deposits or other collateral as a condition of employment and are not subject to the unlawful withholding of wages, identification cards, passports or other travel documents, or other personal belongings without their consent.
- **Safe Working Environment** - Providing a safe and healthy workplace, and working to protect workers, local communities



and the environment from exposure to hazardous chemicals. Suppliers must ensure that any accommodation/lodging provided is clean, safe and sanitary and employees have access to adequate medical assistance as required.

- **Workplace accident insurance** - Providing accident insurance for all workers covering medical treatment for work-related illness and injury, and compensation for work-related illness and injury causing death or permanent disability.
- **Employment contracts** - Ensuring that workers are given, in writing and in a language that they understand, the details of their working conditions and rights. This includes, but is not limited to, the nature of the work to be undertaken, rate of pay and pay arrangements, working hours, holiday and other leave, and all other benefits of employment.
- **Wages** - Ensuring all workers are paid a wage equal to or exceeding the legal minimum wage.
- **Respect for diversity** - Ensuring that workers are protected from any discrimination that would constitute a violation of their human rights, establishing working practices that safeguard against any unlawful or unethical discrimination, and endeavouring to ensure that migrant workers are treated no less favourably than other workers performing a similar task.
- **Harassment and abuse** - Ensuring the implementation of policies to prevent harassment and abuse, including sexual harassment and abuse.
- **Access to remedy** - Ensuring workers have access to judicial remedy and to credible grievance mechanisms, without fear of retribution or dismissal.
- **Data protection principles** - Ensuring confidentiality in all dealings with workers and ensuring that permission has been given and documented before disclosing, displaying, submitting or seeking confidential or personal information or data obtained in connection with the recruitment or employment of workers.

### 3. Respect the environment

---

Respect the natural environment by:

- Complying with all relevant applicable laws and regulations relating to the protection of the environment.
- Avoiding contamination or pollution of water sources at and around farms and facilities, and conserving water resources.
- Minimising, recovering or reusing waste where practicable and disposing of waste in accordance with local regulations.

- Reducing greenhouse gas emissions by using fossil fuels and non-renewable resources efficiently, and investigating alternatives where practicable.
- Upholding all applicable laws and relevant industry guidelines for the protection and humane treatment of animals.

### 4. Respect local communities

---

Respect local communities by:

- Respecting the rights of local communities and indigenous people to give or withhold their free, prior and informed consent to operations on lands to which they hold legal, communal or customary rights.
- Respecting land tenure rights by recognising duties and responsibility associated with tenure rights, such as respect for the long-term protection and sustainable use of land, forests and fisheries. This is done in cognisance of the national obligations, constitutions, local laws and regulations of the country in which the Supplier is operating.
- Preventing and adequately addressing any adverse health and safety impact of their operations on surrounding communities.
- Not participating in or benefitting from illegal forced relocations.
- Employing and sourcing goods and services locally whenever practicable.

### 5. Avoid or disclose conflict of interest

---

Ensure the Supplier's personnel conduct themselves in such a way that does not create suspicion of any conflict of interest, or the appearance of unfair favouritism, between their official business duties and their private interest, and does not benefit them personally as a result of purchases or sales made between the Supplier and Wilmar Sugar.

Suppliers must disclose any situation that they feel may appear to be a conflict of interest. Each Supplier should also disclose if any Wilmar Sugar employee has an interest in or any kind of economic interest in the Supplier.

### 6. Avoid or report bribery and corruption

---

Compete fairly for business, without offering, giving or receiving bribes or improper payments, or participating in any kind of corrupt activity, either directly or through a third party. There will be no



tolerance of this behaviour by any employee or Supplier.

Any Supplier who feels that they are pressured into this sort of behaviour by a Wilmar Sugar employee must immediately report through the communication channels listed in this Code.

## 7. Avoid improper influence

---

Ensure that job-related gifts, meals or entertainment are reasonable and do not influence a business decision improperly or impair independence or judgement of the recipient. Specifically, Suppliers must not offer any Wilmar Sugar employee gifts or entertainment or make donations on the behalf of or for the benefit of any Wilmar Sugar employee, unless Wilmar Sugar expressly permits this. Any meals given by a Supplier to a Wilmar Sugar employee must be of reasonable value and provided only in the course of the Supplier's business with Wilmar Sugar.

Suppliers should note that employees are required to report gifts and hospitality as part of their employment. Inappropriate gifts or hospitality that have the potential to be considered a bribe or create an implicit obligation may result in Wilmar Sugar no longer doing business with the Supplier. Employees are required to report any situations where they are unsure of the intent of the Supplier to their Manager.

No gifts at all should be offered by the Supplier if the Supplier is involved in the process of bidding for business with Wilmar Sugar.

The following items must not be given under any circumstances, regardless of their value:

- Cash or personal cheques.
- Product or service discounts that are not available to all Wilmar Sugar employees.
- Personal use of accommodation or transportation.
- Payments or loans to be used toward the purchase of personal property.

## 8. Safeguard confidential and proprietary information

---

Ensure appropriate steps are taken to safeguard and maintain confidential and proprietary information of Wilmar Sugar and only use such information for purposes authorised by Wilmar Sugar.

If the Supplier becomes aware or suspects that there has been a breach of any confidential or proprietary information in its possession, then the Supplier must immediately notify Wilmar Sugar of that data

breach. The Supplier must:

- (a) promptly disclose to Wilmar Sugar all information relevant to that actual or suspected data breach;
- (b) investigate whether a data breach has occurred; and
- (c) provide Wilmar Sugar with access to and copies of relevant records relating to the investigation.

## 9. Share Supplier accreditation information

---

Share supplier accreditation information if requested. Where Suppliers have undertaken external or independent questionnaires, self-assessments or accreditation on topics that are relevant to this Code (e.g. ESG compliance, Sedex, Modern Slavery, etc.), Suppliers shall share that information and their responses with us to further confirm their approach to these issues, if requested.

## 10. Ensure compliance with the Code

---

Ensure compliance by:

- Making their suppliers and sub-contractors fully aware of this Code and its meaning.
- Communicating the contents of this Code to their employees.
- Advising Wilmar Sugar immediately of any suspected breach of the principles of this Code.

## 11. Wilmar Sugar's rights under the Code

---

Acknowledge that Wilmar Sugar, in its sole discretion, reserves the right to not initiate, to suspend or to terminate its relationship with a Supplier if the Supplier refuses to consent to the Code, fails to comply with the Code or take appropriate steps to comply with the Code.

## 12. Report concerns and compliance matters

---

Wilmar Sugar has established a secure communication channel to enable our Suppliers to confidentially raise concerns and compliance matters related to this Code. Our Whistleblower Standard (found at [www.wilmarsugar-anz.com](http://www.wilmarsugar-anz.com)) sets out how individuals can confidentially disclose or report information, and how such matters will be handled.