

ALVEAN SUGAR SL

# SUPPLIER & BUSINESS PARTNER CODE OF CONDUCT

# ABOUT ALVEAN



**Alvean<sup>1</sup> is specialized in the origination, commercialization and trading of raw and white sugar globally.**

Our company combines experience, comprehensive global market knowledge, business specialization, a talented team and an exclusive supply base, as well as integrated logistics, to offer the best service to customers and sugar suppliers worldwide.



1. "Alvean" means Alvean Sugar SL, Bilbao, its Lancy (Geneva) branch office, its subsidiaries and Alvean Sugar Intermediacao e Agenciamento Ltda.

# PURPOSE AND SCOPE

**Alvean is committed to operating its business in a socially, economically and environmentally sustainable manner. We believe that strong ethics form the basis of our actions. This is not only essential to our reputation, but also for ensuring the ongoing overall success of our company and our stakeholders.**

Alvean's Supplier & Business Partner Code of Conduct (the "**Code**") applies to all of our company's suppliers of services and goods and other business associates (together referred to as "**Business Partners**"). It sets out the standards with regard to business ethics and integrity that we expect our Business Partners to follow.

We expect our Business Partners to maintain management systems to ensure compliance with this Code. In addition, our Business Partners are required to ensure that this Code and the principles contained therein are replicated to their employees, suppliers and subcontractors, so as to ensure its application throughout the entire supply chain.

Alvean may verify compliance with this Code itself or through qualified external parties. We reserve the right to request corrective action or take appropriate measures (up to termination of the business relationship), in case of noncompliance with the Code.

## Reporting and raising concerns

Business Partners are required to notify Alvean of any suspected or actual violations of this Code.

Any suspected or actual violations of the Code can be reported directly to Alvean at [compliance@alvean.com](mailto:compliance@alvean.com), or to our Business Ethics Line.

Reports to the Business Ethics Line are received by a third-party specialist company, which is independent of Alvean and our parent company Copersucar. All reports are completely confidential, and anyone submitting information to the Business Ethics Line can choose to remain anonymous.

## BUSINESS ETHICS LINE

- The Business Ethics Line is available 24 hours a day, 365 days a year.
- Information can be provided in English and Portuguese.

### Website:

[www.canaldeetica.com.br/relateaqui/](http://www.canaldeetica.com.br/relateaqui/)

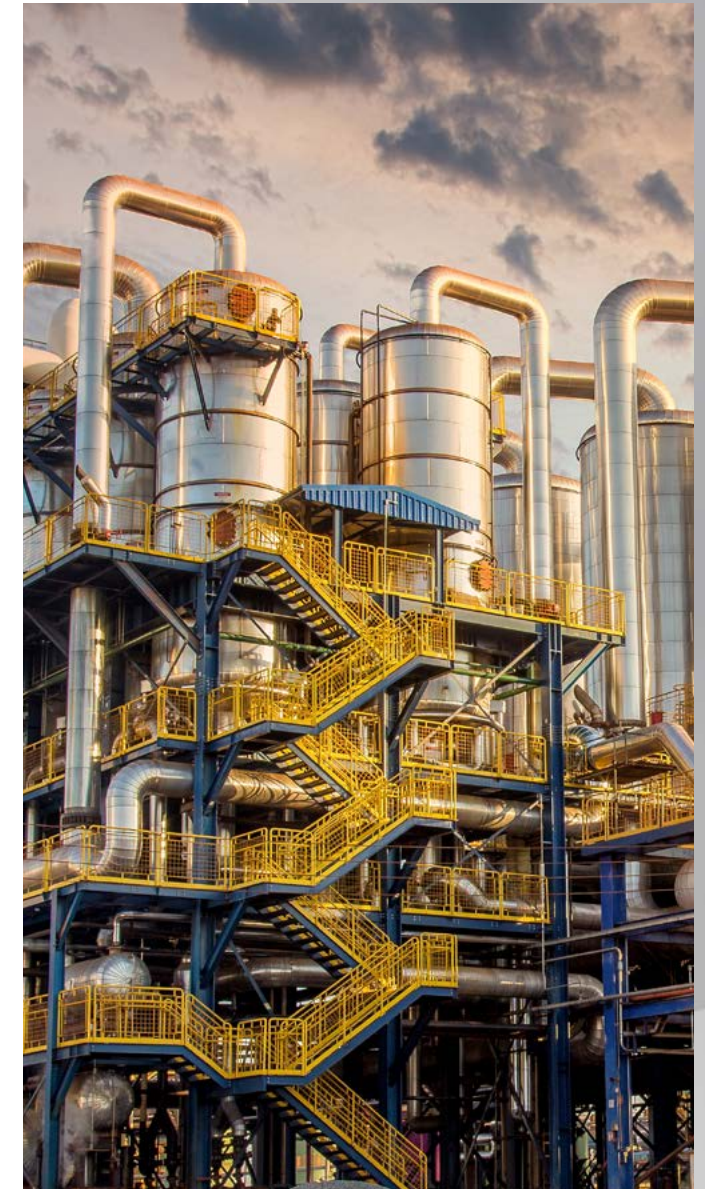
### Email (English):

[report-iit@ethicschannel.com](mailto:report-iit@ethicschannel.com)

### Email (Portuguese):

[relateaqui@canaldeetica.com.br](mailto:relateaqui@canaldeetica.com.br)

**Phone (Brazil only): 0800 3778048**





# BUSINESS INTEGRITY AND ETHICS



## Compliance with the law, fair competition

Alvean requires that all Business Partners comply with all applicable laws and regulations, and shall compete fairly in the marketplace.



## Food safety

We expect our Business Partners to comply with any and all applicable industry-specific food safety laws and regulations in order to maintain food safety and quality standards throughout the supply chain.



## Conflict of interest

Business Partners should avoid any relationship, influence or activity that might impair their ability to make fair and objective decisions when conducting business with Alvean. Any actual or potential conflict of interest must be disclosed to Alvean and all other affected parties, as soon as possible, through our Conflict of Interest Form, which can be found on our website or upon demand via [compliance@alvean.com](mailto:compliance@alvean.com).



## Bribery/corruption

All forms of offering or accepting personal or improper advantage, bribery, kickbacks and corruption are prohibited, and Business Partners must have a zero-tolerance policy to prohibit any such behavior. Business Partners shall not take any action that would violate, or cause us to violate, any applicable anti-bribery law or regulation.



## Gifts/hospitality

Any gifts, business entertainment or hospitality with Alvean employees must be reasonable in nature and not intended to influence in any way our business decisions.



## Money laundering

Business Partners are expected to comply with all applicable anti-money laundering laws. Alvean condemns and does not participate in any possible conduct aimed at using, receiving or laundering money or goods of unlawful origin.



## Privacy and protection of personal data

All Business Partners must establish procedures to ensure that all processing of personal data is handled in compliance with applicable local laws, including but not limited to the General Data Protection Act and General Data Protection Regulation.<sup>2</sup> Alvean's confidential information and intellectual property must be safeguarded and must not be shared with any third party unless expressly permitted in writing. Any authorized transfer of confidential information is to be done in a manner that protects intellectual property rights.



## Sanctions and trade restrictions

Business Partners should ensure they conduct their business in compliance with all applicable sanctions laws and regulations. Business Partners are expected to implement effective management systems to minimize the risk of any noncompliance with relevant sanctions laws and regulations, including training and support for their employees and contract workers.



2. LGPD (Lei Geral de Proteção de Dados) – Lei Brasileira de Proteção de Dados – No. 13.709/2018 and/or the EU General Data Protection Regulation (GDPR) no. 2016/679

# HUMAN AND LABOR RIGHTS



## Compliance with human rights and labor laws

Alvean is committed to applying the UN Guiding Principles on Business and Human Rights. Respecting human rights in our own operations and supply chain is one of our core principles.

Consequently, our Business Partners are required to conduct their operations in a way that respects the human rights of others, and to comply with all applicable labor and health & safety laws, regulations, international agreements (such as the UN Universal Declaration of Human Rights), guidelines and industry standards.

In particular, and as a bare minimum, we expect our Business Partners to uphold the following principles for their own employees and contract workers:



## No child labor

Our Business Partners must ensure their operations are free from child labor. Children are to be protected from any work that could compromise their health, education and development. The relevant requirements regarding minimum age that our Business Partners must observe are laid down in the Conventions of the International Labour Organization (ILO), and more specifically in ILO Convention no. 138, which provides that the minimum age shall not be less than the age of completion of compulsory schooling and, in any event, shall not be less than 15 years. Additionally, Business Partners should respect the minimum age of 18 years for any hazardous work.



## No forced labor

The use of forced labor by our Business Suppliers is not acceptable. Forced labor means any type of work or service demanded from an individual under the threat of any sort of punishment and which the individual has not accepted to carry out voluntarily.



## Occupational health, safety and security

Our Business Partners are required to provide a safe and healthy working environment, adopt procedures to identify and address workplace health and safety risks, implement safe working practices and procedures, and provide (where relevant) appropriate personal protective equipment to prevent work-related injuries or illnesses.



## No discrimination or harassment

Business Partners shall treat all of its employees and workers fairly and equally, and provide a workplace that respects diversity and is free of discrimination, including but not limited on the basis of race, gender, nationality, sexual orientation, religion, physical ability, age or other status. Business Partners should strive to ensure that workplaces are free from harassment and similar unprofessional behavior.



## Freedom of association

Business Partners must allow their employees freedom of association and collective bargaining, and respect their right to freely join workers' organizations of their own choosing.



## Wages and working hours

Business Partners are to comply with all applicable laws and regulations on salaries and working hours. Employees should not be required to work more than the maximum allowed number of working hours established by local law. Employees must not be paid less than the locally applicable minimum wage and must receive all employment benefits to which they are legally entitled. Business Partners must pay overtime, if applicable.

# ENVIRONMENTAL PROTECTION



## Compliance with law and industry standards

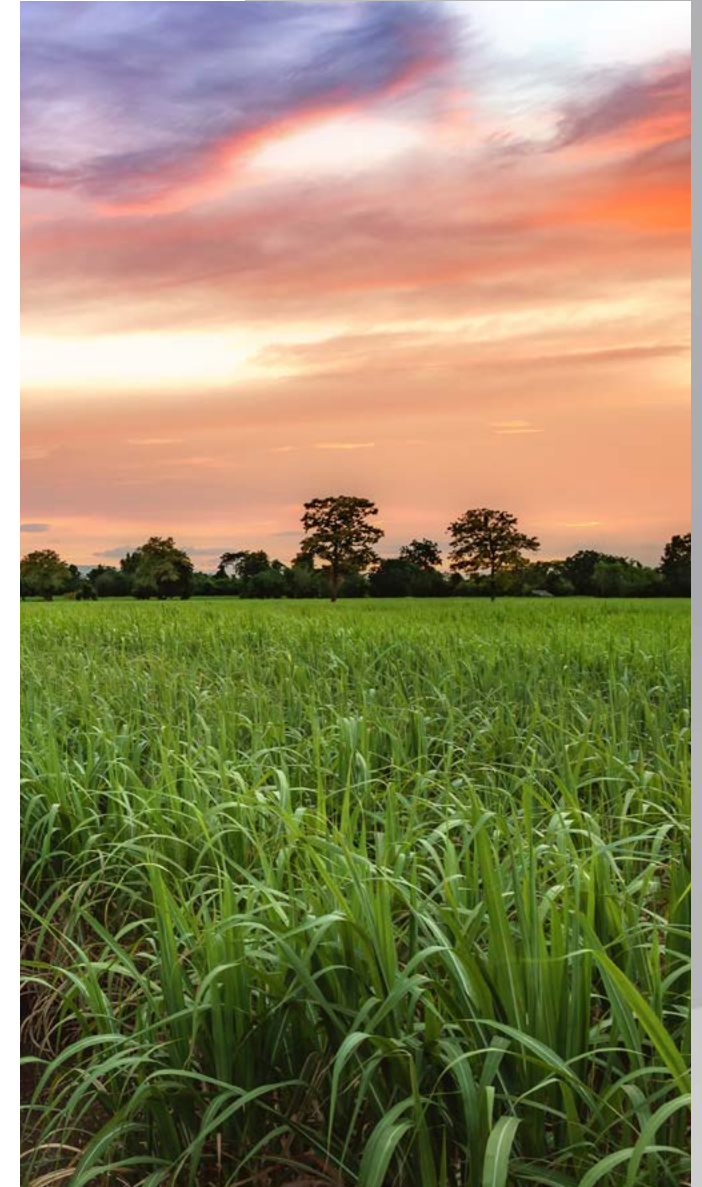
We expect our Business Partners to comply with all applicable legal requirements, as well as with any existing industry standards and guidelines regarding the environment and sustainability. At the very least, our Business Partners are expected to:

- Use raw materials and natural resources in a responsible manner, and employ best practices to reduce energy consumption and any associated greenhouse gas emissions, both during the production process and transportation of goods produced.
- Not compromise water quality and availability, and to use water carefully and economically in all processes.
- Avoid the usage of any substances or wastewater whose release may pose a threat to humans and the environment, and maintain a hazardous material management policy, which ensures the safe use, storage, reprocessing, recycling and disposal of such materials.
- Ensure that all required environmental permits, approvals and registrations are obtained, maintained and follow any reporting requirements.
- Ensure that its operations do not directly contribute to deforestation or loss of biodiversity.
- Assure that (where relevant) products supplied to Alvean have not originated from protected areas such as the Brazilian Protected Biomes, or conflict-affected areas.

## Cooperation with Alvean

Alvean may, from time to time, set key performance indicators around environmental performance that the company will endeavor to achieve through various available means. Business Partners shall, where requested, provide reasonable assistance to Alvean to achieve its environmental goals.

**Alvean strives to be aware of and minimize its environmental impact to operations and supply chains, and to contribute to a more sustainable world.**



# AGREEMENT TO COMPLY WITH ALVEAN'S SUPPLIER & BUSINESS PARTNER CODE OF CONDUCT

We the undersigned hereby confirm that:

Date: \_\_\_\_\_

- We have received and taken due note of Alvean's Supplier & Business Partner Code of Conduct;

Full company name: \_\_\_\_\_

- We will inform Alvean in case of conflict between provisions of the Code and any applicable laws or regulations in our countries of operation;

Signature: \_\_\_\_\_

- We will observe the Code;

Name: \_\_\_\_\_

- We will communicate as appropriate to our employees, agents and subcontractors the terms of the Code and ensure that they comply with the provisions therein.

Title/position: \_\_\_\_\_



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**[www.alvean.com](http://www.alvean.com)**

More information can be obtained at [legal@alvean.com](mailto:legal@alvean.com)