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## Corporate Social Responsibility

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Sigma Oil Seeds B.V.

Version 1.0 – 2020 – 23-04-2020



## 1. Objective and purpose

This document establishes minimum performance expectations and continuous improvement benchmarks for our suppliers. The Foundation is based on SIGMA OIL SEEDS's values, and ethical and sustainability commitments, and it is aligned with international principles, standards and best practices. SIGMA OIL SEEDS expects all suppliers to take every measure to adopt and exceed the behaviours that are in line with the clauses set out in this policy.

We acknowledge that our suppliers operate in different cultural and legal environments. If there are cases where meeting the expectations of this policy leads to a conflict or violation of applicable laws or regulations, the supplier shall notify SIGMA OIL SEEDS immediately. In these cases, we are open to assessing alternative options towards better businesses practices that comply with national and local laws. SIGMA OIL SEEDS is committed to supporting the growth and development of our suppliers and, where appropriate, investing in capacity building to meet and exceed the expectations of this policy and generate positive and sustainable impact.

Our success, in part, has been due to the establishment of direct and close working relationships with our suppliers and the communities where they operate. As a result, we encourage suppliers to identify areas of opportunity and, where feasible, collaborate with SIGMA OIL SEEDS in the implementation of continuous improvement measures that address root cause issues and create socially responsible, resilient, and regenerative supply chains.

Suppliers should not face obstacles or disadvantages to partnering with SIGMA OIL SEEDS because of the implementation of this policy's requirements. We understand that the attainment and upholding of ethical and responsible practices is an ongoing, long-term commitment, and requires collaboration for mutual and shared benefit.

## 2. Scope and responsibility

This policy applies SIGMA OIL SEEDS's direct suppliers and their subcontractors. This includes suppliers providing raw materials, synthetics, sundries, and packaging products. As part of our commitment to continuously improve our business practices, SIGMA OIL SEEDS will conduct a review of this policy every two years and update its clauses, as necessary.

## 3. Addressing questions

Suppliers may raise questions about the Foundations' clauses to SIGMA OIL SEEDS. For more information about our sustainability and ethical standards and benchmarks, or to raise a question, please contact: [info@sigmaoilseeds.eu](mailto:info@sigmaoilseeds.eu)

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## 4. Minimum expectations

### 4.1 Anti-bribery and anti-corruption

SIGMA OIL SEEDS strictly prohibits all forms of bribery, corruption, extortion, or embezzlement in all commercial dealings undertaken by our suppliers. SIGMA OIL SEEDS expects suppliers to adhere to all relevant legal obligations and local and national regulations.

### 4.2 Humane treatment

SIGMA OIL SEEDS suppliers shall maintain a workplace free of any form of harsh or inhumane treatment. The use or threat of physical or sexual violence, harassment and intimidation against a worker shall not be allowed. SIGMA OIL SEEDS's suppliers shall commit to treating all their workers with dignity and respect; have zero tolerance of corporal punishment, or mental or physical abuse.

### 4.3 Human trafficking, forced & compulsory labour

SIGMA OIL SEEDS strictly prohibits human trafficking in all our suppliers' operations. SIGMA OIL SEEDS's suppliers shall not subject their workers to any form of forced, compulsory, bonded, or indentured labour. All work must be voluntary and workers shall have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice, and according to national laws and regulations.

### 4.4 Child labour

SIGMA OIL SEEDS's suppliers shall not engage in any employment of child labour. Child labour refers to work that is mentally, physically, socially, morally dangerous or harmful to children or that improperly interferes with schooling needs as per ILO Conventions 138 and 182. Should suppliers become aware of any child labour taking place, SIGMA OIL SEEDS expects them to support transition programs away from harmful working environments and/or avenues to support the child back into education.

### 4.5 Freedom of movement and personal freedom

SIGMA OIL SEEDS's suppliers shall not unreasonably restrict their workers' freedom of movement. Workers' identity papers or travel documents shall not be confiscated. Workers shall not be physically confined to their workplace or related premises; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom.

### 4.6 Workplace equality and non-discrimination

SIGMA OIL SEEDS's suppliers shall treat all their workers fairly and equally, irrespective of their nationality, gender, race, religion, sex, age, ethnicity, physical condition, political view, or legal status. Discrimination on any of these bases should not be tolerated. In addition, suppliers shall ensure that no pregnancy tests are a condition of employment.

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## 4.7 Safe & healthy working conditions

SIGMA OIL SEEDS's suppliers shall provide their workers with a safe and healthy workplace, and shall adopt appropriate practices to prevent threats to human life, health, and welfare. As a minimum, potable drinking water, adequate sanitation, emergency exits, essential safety training and equipment, and access to emergency medical care while at work shall be provided.

In addition, SIGMA OIL SEEDS suppliers shall identify hazardous materials, chemicals and substances used in their operation, and ensure their safe handling, movement, storage, recycling, reuse and disposal. Suppliers, at a minimum, shall comply with applicable legislation, and abide by material restrictions and product safety requirements, including training employees and contractors in product safety practices.

## 4.8 Freedom of association and collective bargaining

SIGMA OIL SEEDS's suppliers shall respect their workers' right to freedom of association and collective bargaining, unless prevented by law, consistent with applicable ILO Conventions 87 and 98 and those identified by the United Nations Universal Declaration of Human Rights. If the right to freedom of association and collective bargaining is prevented by law, SIGMA OIL SEEDS expects suppliers to allow for parallel means of worker representation, elected freely without interference or negative repercussions from the organization.

## 4.9 Remuneration, wages and benefits

SIGMA OIL SEEDS's suppliers shall promote and ensure equal remuneration for men, women and transgendered individuals for work of equal value. In addition, all workers employed by our suppliers shall be paid at least the minimum wage required by applicable laws in their country of jurisdiction, and shall be provided all legally mandated benefits. Information shall be provided to workers at the time of their hire about hours worked, rates of pay, and the calculation of legal deductions.

## 4.10 Working hours

SIGMA OIL SEEDS's suppliers shall not require their workers to work more than the number of hours permitted by national law. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities.

## 4.11 Contracts of employment

Where possible, written contracts of employment shall be provided to workers in a language they can understand, clearly indicating their rights, responsibilities and conditions of employment, which shall include, at a minimum: wages, benefits, working hours, locations of the work, living conditions when applicable, work-related hazards, and other working and employment conditions.

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## 4.12 Diversity and inclusion

SIGMA OIL SEEDS's suppliers shall strive to adopt approaches, measures, and processes to help enhance meaningful participation of diverse and under-represented groups, including decision-making, leadership roles, and other aspects of their business.

## 4.13 Management of environmental impacts

We encourage suppliers to identify and reduce all their environmental impacts in a process of continuous improvement by: preventing, minimising and remedying negative impacts on air, land, soil, water, forests, and biodiversity, and reducing pollution and greenhouse gas emissions.

## 4.14 Land use rights

Suppliers shall respect legitimate tenure right holders and their rights over natural resources, including public, private, communal, collective, indigenous, and customary rights that could potentially be affected by the supplier's activities. Agricultural production and activities on local or aboriginal land shall be subject to the free, prior, and informed consent of affected communities.

## 4.15 Animal welfare

Suppliers shall not test or commission any test of their products on animals. Suppliers shall confirm that the ingredients supplied to SIGMA OIL SEEDS have not been tested on animals unless otherwise disclosed to SIGMA OIL SEEDS.

## 4.16 Grievance procedures

Suppliers shall have an effective, confidential grievance process to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind. Grievance mechanisms shall be available in a language that workers understand and shall include the ability to report incidents or grievances anonymously.

## 4.17 Commitment to transparency & supply chain visibility

SIGMA OIL SEEDS expects suppliers to conduct their business in an open and transparent manner. We expect suppliers to disclose if they are engaging subcontractors in the production or processing of their goods and services. In addition, we expect suppliers to keep SIGMA OIL SEEDS informed of all practices and resources pertaining to: production of materials sourced, supplier traceability, and other aspects of their operations that relate to the expectations and requirements of this policy. SIGMA OIL SEEDS believes in partnerships and collaboration, and we are willing to work with our suppliers to improve performance where necessary. As a result, we may conduct site visits and/or inspect working conditions, from time to time.

## 4.18 Commitment to continuous improvement

SIGMA OIL SEEDS is committed to supporting the growth and development of our suppliers and, where appropriate, investing in capacity building to meet and exceed the expectations of this policy. As a result, we encourage suppliers to identify areas of opportunity and, where feasible, collaborate with SIGMA OIL SEEDS in the implementation of continuous improvement measures that address root cause issues and create socially responsible, resilient, and regenerative supply chains.

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## 5. Continuous improvement benchmarks in raw materials

### 5.1 Environmental conservation

SIGMA OIL SEEDS encourages suppliers to protect and conserve biodiversity, and promote the sustainable management of living natural resources through the adoption of practices that integrate and promote biodiversity conservation needs and priorities.

### 5.2 Farm and crop diversification

SIGMA OIL SEEDS encourages suppliers to avoid monocropping farming, and strive to diversify their farms through the application of regenerative farming practices that maintain and improve soil fertility, promote crop and animal diversification and integration, and encourage high biomass recycling rates.

### 5.3 Water & energy use

SIGMA OIL SEEDS encourages suppliers to adopt measures that preserve water and energy, and minimize the release of pollutants into water and the environment. These measures include, but are not limited to, the use of water conservation techniques, water consumption offsets to reduce total demand for water, water recycling and reuse measures, and energy efficiency and reduction efforts. In addition, SIGMA OIL SEEDS encourages suppliers to calculate their carbon footprint and share results with us to improve our understanding of our supplier greenhouse gas emissions.

### 5.4 Food security

SIGMA OIL SEEDS encourages suppliers to ensure that their operations contribute to food security and nutrition. Attention shall be given to enhancing the availability, accessibility, stability, and utilization of safe, nutritious, and diverse foods within the farms producing raw materials. In addition, suppliers shall strive to increase the resiliency of agriculture food systems and related livelihoods to the effects of climate change through adaptation measures.

### 5.5 Use of genetically modified organisms (GMO's)

In the case where raw materials contain GMO's, the supplier shall disclose this information. Where feasible, SIGMA OIL SEEDS will work with suppliers to transition away from GMO's.

### 5.6 Use of chemicals and synthetic pesticides

SIGMA OIL SEEDS prioritizes sourcing ingredient grown organically. As a result, we encourage suppliers to grow materials in an organic way, without the use of chemical inputs, synthetic pesticides, herbicides or fertilizers. If chemicals or other synthetic materials are being used, suppliers shall identify those materials and disclose them. Where feasible, SIGMA OIL SEEDS will work with suppliers to transition towards organic and natural techniques for farming and pest control measures.

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## 6. Continuous improvement benchmarks in packaging and sundries

### 6.1 Recycling

Suppliers are encouraged to commit to production and packaging standards that reduce the amount of materials used and can be 100% recyclable.

### 6.2 Waste and input management

Suppliers are encouraged to implement and demonstrate sound measures to prevent pollution and minimise solid waste, wastewater and air emissions. Prior to discharge or disposal, suppliers shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.

### 6.3 Material end-of-life management

Suppliers are encouraged to have a policy or standard for the end-of-life management of their products and materials, and should demonstrate how environmental considerations are applied in this process. This may include product re-use and re-cycling, product recovery and restoration, and responsible disposal. We acknowledge and understand these standards and expectations when providing goods or services for SIGMA OIL SEEDS.

Rotterdam, 23.04.2020

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