

# Tracomex

## Supplier Code of Conduct 2026

### Context

For more than 120 years, Cefetra Group has supplied agricultural ingredients to the animal nutrition, food, petfood, cosmetics, paper and energy industries. With a broad portfolio and deep expertise in supply chains and logistics, our companies provide customers with the highest level of service. Quality, food safety, and sustainability are core priorities for Cefetra Group. We are committed to ensuring sustainable raw material flows and maintaining the highest level of integrity throughout our supply chain. A supplier code of conduct is established to support this commitment.

### Purpose and scope

This Supplier Code of Conduct (“Code”) sets forth the minimum standards and expectations for all suppliers, contractors, service providers, agents, and business partners (“Suppliers”) working directly and indirectly with Cefetra Group and its entities. As an EU-based agricultural trading company sourcing food and feed ingredients globally, we expect all Suppliers to uphold internationally recognized human rights, support ethical business practices, and contribute to sustainable agricultural value chains.

### Driving improvement in the supply chain

Suppliers of Tracomex are encouraged to develop their own Code of Conduct and to include similar requirements to those outlined in this document, helping to promote compliance and responsible practices throughout the entire supply chain.

### Compliance with laws and international standards

Suppliers must comply with all applicable local, national, and international laws, regulations and international standards, including those related to labor, environment and health and safety.

Furthermore, suppliers must comply with all applicable international trade regulations, including economic sanctions, export control laws, customs regulations, and anti-money laundering legislation. Suppliers shall ensure that goods, services, and financial transactions related to business with Tracomex do not involve sanctioned individuals, entities, or countries, and must implement appropriate controls to prevent violations of applicable trade restrictions.

The requirements that have been included in this Code of Conduct are based on the UN Sustainable Development Goals [SDGs).

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## Labor and human rights

### 5.1 Prohibition of Forced Labor

Suppliers must support and uphold the protection of internationally recognized human rights and ensure that they are not involved in any human rights abuse or use forced, bonded or prison labor. Suppliers must not engage in modern slavery, human trafficking and/or other forms of exploitation. Human trafficking is defined as the trade in people and does not necessarily involve the movement of persons. Modern slavery is the severe exploitation of people for personal or commercial gain. Workers must have the ability to leave employment with reasonable notice.

### 5.2 Child Labor

Suppliers must take all necessary measures to prevent the hiring of workers below the legal minimum age or engage in harmful or exploitative child labor (ILO Convention No. 138 and No. 182). Children and young workers need to be protected from economic exploitation and from performing work that is likely to jeopardize their health and safety, morality, interfere with their education or harm their development. Young workers shall not be employed at night or in hazardous conditions.

### 5.3 Non-Discrimination and harassment

Suppliers must provide equal opportunity and prohibit discrimination based on gender, race, ethnicity, religion, disability, age, sexual orientation, nationality, political affiliation, pregnancy, or any other protected characteristic. Suppliers must protect workers against intimidation, oppression or harassment in any form. No harsh, inhumane, or unequal treatment is permitted.

### 5.4 Fair Wages and Working Hours

Suppliers shall remunerate employees and/or contracted workers appropriately; wages must meet or exceed legal minimum and industry standards. In absence of such legislation or standard, suppliers must ensure employees and/or contracted workers receive at least a living income or minimum income, whichever is higher. A living income is defined as 'the net income a household would need to earn to enable all members of the household to afford a decent standard of living'.

Working hours must comply with legislation, with minimum standards applicable for the industry concerned, or relevant ILO Conventions, whichever is more stringent. Employees and/or contracted workers shall not be required to work extreme hours without adequate rest periods. Overtime must be voluntary.. Suppliers shall maintain proper accurate employment records including calculation of pay and hours worked. Workers must receive transparent information about their wages and employment terms.

If third parties are employed, suppliers must ensure that employees' basic rights are protected through appropriate instruction and supervision.

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# Tracomex

## 5.5 Freedom of Association

Suppliers must respect workers' rights to form or join trade unions, bargain collectively, and participate in worker representatives' activities. If this right, the freedom to association and collective bargaining is restricted by law, then the supplier shall facilitate alternative means of independent and free association for bargaining for employees such as workers forums.

## Health, safety and well-being

### 6.1 Occupational Health and Safety and training

Suppliers shall implement effective occupational health and safety systems, clean sanitation facilities and access to drinking water. Where accommodation is provided it should be clean, safe and meet the basic needs of workers. Measures to prevent injuries, exposure to harmful chemicals, or unsafe practices must be in place, as well as emergency preparedness and response procedures.

Suppliers shall ensure that employees and/or contracted workers are not endangered in any way due to the use of dangerous machinery, unsafe building structure or layout, harmful noise emissions, or dangerous substances. Proper training in safe working and protective equipment must be provided. Where serious or fatal accidents have occurred, suppliers shall be able to demonstrate that all appropriate measures have been taken to prevent similar accidents occurring in the future.

### 6.2 Exposure to dangerous substances

Suppliers shall not use dangerous substances, such as chemicals, when other, less dangerous substances, are available in the market. Chemicals as named in the Stockholm and Rotterdam Conventions shall not be used.

Suppliers shall use chemicals, and other dangerous substances, according to the instruction provided by supplier of the chemicals, as mentioned on the label of the chemicals, including the advised protective equipment.

Suppliers shall implement procedures for safe handling, movement, storage, recycling, reuse and disposal of dangerous substances.

## Responsible and Ethical Sourcing

Suppliers must commit to responsible and ethical sourcing practices and support traceability, documentation and transparency across their supply chains. Every reasonable effort should be made to ensure that commodities and ingredients delivered to Tracomex do not contribute to deforestation and/or land conversion. For products destined for EU markets, suppliers must commit

# Tracomex

to establish fully segregated deforestation free supply chains for all commodities listed in Annex 1 of the EU Deforestation Regulation (EUDR).

Suppliers undertake to respect the rights and interest of local communities and indigenous people. Free Prior and Informed Consultation of the affected communities must be conducted before any legally permissible change in land use or consumption of water and other resources of local and indigenous communities.

## Business Integrity and Ethics

Suppliers must uphold the highest standards of ethical conduct. Bribery, corruption, extortion, fraud, money laundering or improper financial practices, falsification of documents and anti-competitive practices are prohibited.

Suppliers must not offer, promise, give, request, or accept any undue advantage, including facilitation payments, gifts, hospitality, or other benefits intended to improperly influence business decisions or obtain an unfair advantage. Suppliers shall actively prevent conflicts of interest and ensure that business decisions are made objectively and transparently. Any potential conflict of interest that could affect business relations with Tracomex must be disclosed promptly.

Suppliers must protect and safeguard personal and confidential information in accordance with applicable legislation. Suppliers must also implement appropriate cybersecurity measures to prevent unauthorized access to digital systems used in connection with their business operations.

Suppliers must maintain accurate and transparent records demonstrating compliance with their integrity and ethical conduct commitments.

## Environmental responsibility

Suppliers shall make all reasonable efforts to protect the environment and to limit the negative impact of their activities and products on the environment (e.g. water, soil). They must be in possession of relevant environmental permits, licenses and registrations necessary for their operations.

Suppliers shall implement procedures for handling, movement, storage, recycling, reuse and disposal of materials in such a way that the environment is protected, and the negative impact of their activities on human health and ecosystems are limited. Suppliers should operate in compliance with the Basel Convention.

Suppliers shall not engage in activities that result in the clearance, conversion or development of High Conservation Value Areas, including but not limited to high carbon stock forests and peatlands.

# Tracomex

Conservation Value Areas (HCVAs) are natural habitats, which are of outstanding significance or critical importance due to their high biological, ecological, social and/or cultural values.

Suppliers shall use resources such as water, fuel, and electricity responsibly and work to reduce their consumption over time—for example, by improving resource efficiency—as far as reasonably possible.

Recognised best practices shall be adopted, as far as reasonably possible, to maintain and enhance the health and productivity of all ecosystems from which raw materials are sourced. This includes agricultural soils (with consideration for soil structure, fertility, and erosion), marine and freshwater environments (ensuring the protection of water quality, biodiversity, and long-term stock viability), as well as terrestrial and aquatic extraction sites for minerals, salts, limestone, and other non-agricultural materials.

Suppliers are encouraged to implement measures to reduce Greenhouse Gas emissions from their operations. Tracomex actively seeks transparency and insight into all Greenhouse Gas emissions generated within its supply chains.

Waste from operations, industrial processes, and sanitation facilities shall be monitored, controlled, and adequately treated before environmentally safe discharge or disposal. Waste generation shall be minimized at the source by optimizing production processes as far as reasonably possible, and recyclability shall be actively pursued.

## Animal welfare (if applicable)

Suppliers handling livestock or animal-derived products must ensure the humane and responsible treatment of animals throughout their supply chains, in line with all applicable laws and internationally recognized animal welfare standards. Suppliers are expected to adhere to the Five Freedoms of animal welfare.

Animals must be treated with care and respect, and unnecessary suffering must be avoided at every stage of farming, transport, and processing. Tracomex encourages suppliers to promote responsible sourcing and to continuously improve animal welfare practices within their supply chains.

## Monitoring, verification and continuous improvement

Tracomex reserves the right to monitor compliance with the Supplier Code of Conduct. To support this, suppliers must provide information upon request and grant access to all documentation required for audit purposes.

# Tracomex

If a supplier does not comply with this Supplier Code of Conduct, they are required to promptly and proactively implement appropriate corrective measures. If either the direct supplier or any subcontractors fail to take sufficient remedial action, Tracomex may terminate the business relationship in line with contractual or legal provisions.

## Whistleblowing, reporting violations and grievance mechanisms

Suppliers who become aware of any violation of this Supplier Code of Conduct must report it immediately and fully cooperate in the clarification process. The legitimate interests of suppliers and the rights of employees—especially regarding data protection and confidentiality—will be safeguarded during reporting. This also applies to violations committed by subcontractors.

Tracomex expects suppliers to uphold the same human rights, labor, and ethical standards that apply internally to our own employees under the Tracomex Code of Conduct. Tracomex encourages suppliers to promote a speak-up culture and to ensure their workers understand how to raise concerns safely, either through the supplier's own channels or directly to Tracomex when appropriate.

Suppliers must maintain accessible, safe and confidential channels to allow workers and communities to raise concerns without fear of retaliation. They must inform potentially affected parties of their rights under this Supplier Code of Conduct and of the option to report violations directly to Tracomex. They also guarantee that no adverse or disciplinary actions will be taken against whistleblowers for submitting such reports.

The details of the Tracomex whistleblower system can be found via the link in the footer of this document.

## Building partnerships

Tracomex is committed to building partnerships that foster ethical behavior, human rights protection, responsible agriculture, and sustainable global supply chains. By working together, we increase our reach and impact. Do you want to join forces? Reach out to your regular Tracomex contact or to our sustainability department.