



WESTROCK
COFFEE

Responsible Sourcing Policy

Westrock Coffee Company, LLC, together with its subsidiaries, Westrock Coffee Roasting, LLC and S&D Coffee, Inc. ("**Westrock**" and "**S&D**" or "**we**"), is a fully integrated, global beverage company providing sourcing, supply chain management, coffee roasting, and distribution services to customers around the world. We ethically source our materials through global supply chains to create meaningful change in the lives of families and connect the world through great beverages.

As part of our mission, we are committed to complying with all applicable laws and regulations in each of the countries in which we operate and ensuring that the parties who supply us with goods and services (each, a "**Supplier**" or "**you**") do the same. This Responsible Sourcing Policy (this "**Policy**") sets forth the minimum standards to which Suppliers of our goods and services must adhere. It is designed to provide us with visibility into all aspects of our supply chains and to protect our Suppliers, associated farmers, and their environments from exploitation. In connection with the foregoing, you, as our Supplier, agree to the following:

1. Observe all applicable laws and regulations in each of the countries in which you operate, including laws relating to employment, discrimination, the environment, and safety and health. This includes without limitation:
 - a. Suppliers will treat all workers, independent of their nationality or immigration status, equally in terms of worker rights and access to employee services.
 - b. Suppliers will not use any form of slave, forced, bonded, indentured, or involuntary prison labor. You shall not engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking. You will not retain employees' government-issued identification, passports or work permits as a condition of employment or as a form of punishment.
 - c. Suppliers will ensure their workers are paid lawful wages in accordance with local laws and regulations. If minimum wages have not been established, then Suppliers will ensure their workers are paid the local industry standard wage.
 - d. Suppliers will maintain labor contracts, employee handbooks, codes of business conduct, or similar written policies that cover working hours, termination conditions, compensation, and other terms of employment.
2. Treat all employees fairly and with dignity and in a manner prescribed by the *UN Global Compact*¹ and the applicable International Labour Organization ("**ILO**") guidance cited therein. This includes, without limitation:

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

- a. Compliance with all applicable laws and regulations, agreements and industry requirements relating to no discrimination with respect to hiring, compensation, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, social background, disability, ethnic and national origin, nationality, membership in workers' organizations including unions, political affiliation, sexual orientation, or any other personal characteristic protected by law.
 - b. No employee shall be subjected to any physical, sexual, psychological or verbal harassment. Employees shall be provided (i) safe and clean working spaces, (ii) access to potable water throughout the workday, and (iii) training and necessary materials to reduce and/or prevent risks to workers' occupational health and safety.
 - c. Employees paid directly by a Supplier or through a 3rd party staffing agency shall be paid for all time worked. Wages paid for regular working hours, overtime hours and overtime differentials shall meet or exceed applicable legal minimums.
 - d. Child labor², as defined by the ILO, United Nations Conventions and applicable law, is forbidden. Any forms of exploitation of children are forbidden. Working conditions resembling slavery or harmful to children's health are forbidden.
 - e. The rights of young workers³, as defined in the ILO, must be protected, and young workers shall not be exposed to hazardous conditions as defined by applicable law.
 - f. All forms of forced labor, including, without limitation, the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labor that violates basic human rights. Suppliers shall not exploit vulnerable populations, including without limitation, making loans to employees with predatory interest rates. The use of corporal punishment, mental or physical coercion and verbal abuse is forbidden.
 - g. Suppliers are expected to establish adequate complaint mechanisms for employees who believe they have been mistreated, and to ensure no retaliation against employees who raise complaints in good faith.
3. Operate in compliance with all applicable environmental laws and work to minimize any negative impact your operations have on the environment. Where applicable to your operations or your supply chain, by way of example and without limitation, this includes: (a) promoting water protection and conservation; (b) utilizing energy efficient methods where feasible; (c) taking reasonable steps to mitigate environmental impacts related to climate change; (d) ensuring legal land use that does not encroach on protected areas; and (e) promoting soil conservation. Procedures for waste management and the handling and disposal of chemicals and other hazardous materials, emissions, and effluent treatment must meet or exceed minimum legal requirements.
 4. Comply with export and import controls that govern your work, including country of origin labeling, product labeling, and product testing, in addition to all contractual requirements.

² <https://www.ilo.org/ipec/facts/lang--en/index.htm>

³ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

5. Comply with all tax, employment, environmental, health and safety, hygiene and food safety, and other applicable laws as well as regulatory requirements in the countries in which you operate. Should the provisions of national law and the requirements of this policy differ, the highest standard shall apply where reasonable.
6. Make and maintain accurate and transparent books, records and accounts to demonstrate compliance with applicable laws and regulations and this Policy.
7. Comply with all applicable anti-corruption laws including, but not limited to, the U.S. Foreign Corrupt Practices Act⁴ and the UK Bribery Act 2010⁵. Under no circumstances may a Supplier working for us offer, promise, or provide anything of value directly or indirectly to a government official for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage.
8. If you have been identified as a **Farmer Direct Verified™** ("**FDV**") supplier, you commit to the traceable and transparent purchase, sale, processing, and transportation of products we source from you. Any farmer information collected by you of FDV products or relating to your transactions with farmers from whom we source FDV products must be collected in compliance with applicable privacy laws. By providing this information to us, you represent and warrant that (i) this information is accurate and was collected in compliance with applicable law, (ii) you have the authority to transmit the information to us, and (iii) we and our customers are authorized to use this information for internal or external purposes with respect to our own products or the products we produce for others.
9. Take reasonable precautions to prevent any Westrock or S&D assets or information to which you have access, custody or control from being stolen, damaged, or misused. Suppliers are also expected to comply with any non-disclosure agreements regarding our confidential information. Our resources must be used at all times in a way that is safe, ethical, and lawful.
10. Provide a copy of this Policy to each of your suppliers and subcontractors so that they can adhere to the same standards detailed herein.
11. Secure and renew all permits related to activities carried out within your operations.
12. To assess if these standards are met by Suppliers, we may:
 - a. Request information and documentation to verify compliance, including information regarding production and sources of goods supplied;
 - b. Reserve the right to visit or to audit Supplier's compliance with the Policy. Site visits and audits may be conducted by us or by our designees;
 - c. Recognize and rely on industry certification and assurance schemes as de facto compliance with key components of this Policy;
 - d. Conduct a periodic review of this Policy and its requirements to ensure it is applicable and relevant to current operations and the rules of law; and

⁴ <https://www.justice.gov/sites/default/files/criminal-fraud/legacy/2012/11/14/fcpa-english.pdf>

⁵ https://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga_20100023_en.pdf

- e. Periodically ask our Suppliers to review this Policy and re-affirm their commitment to comply with it.
13. Suppliers have a duty to report any actual or suspected misconduct that involves or impacts our company to us, along with any actual or perceived conflict of interest. This is true whether it is a violation of this Policy or applicable laws, and whether it is committed by our Suppliers or our own associates. Reporting these types of concerns helps us address issues and maintains the integrity of our business relationships.
14. Failure to comply with this Policy can result in termination of our business relationship.