



Fair Labor and Ethical Cocoa Sourcing Policy



Contact

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Ethical Cacao Policy

We believe that our chocolate supply chain must not only be fair, but that chocolate should mean empowerment. We strive to maintain the highest standards of human dignity as we grow cacao at our farm in Cameroon, Africa, and as we procure cacao from socially-conscious partners around the world.

Moka procures the cacao it uses to make its delicious chocolate in three different ways:

1. We grow our own beans on our farm in Cameroon, West Africa.
2. We directly buy from farmers around the world.
3. We work with ethically-conscious sourcing partners who directly buy from farms for us, while following our Ethical Cacao Policy.

Moka chocolate only uses high quality cacao, and we believe in paying significantly above commodity market prices to share our brand value with the farmers who grow our beans.

We believe that cacao farming can be a powerful vehicle for social upliftment if undertaken with wisdom, sensitivity, and a genuine spirit of partnership. We take the issue of child labor and slavery in cacao farming seriously. We have a zero tolerance policy for child labor on our own farm, and any farm from which we purchase beans. We support industry-standard third-party ethical certifications, and wherever possible work with sourcing partners who maintain these certifications.

The following are internal policies which we have adopted at our own farm, and hold all our sourcing partners accountable for, to ensure that all cacao which we procure is ethical.

- No forced labor or child labor
- Freedom of association and collective bargaining
- Safe and healthy working conditions, including:
 - Protective clothing for work with chemicals
 - Safety training of workers in their own language
- Gender equality
- No discrimination on the grounds of gender, race, tribal background, sexual orientation, national origin, gender identity, age, or disability
- Freedom of cultural expression

- Access to education for children
- Access to decent housing, clean drinking water, and healthcare for workers and their families

We feel it's not enough to only take a stand against child slavery. We must do more to ensure that cacao farming communities--children and adults alike--have access to health, education, and opportunity. That is why we invest back into education and livelihood development projects in the communities that surround our farm in Cameroon. We believe the best way to prevent and overcome child slavery is not only through enforcement, but also through knowledge, opportunity, and sharing hope.

Moka Origins Supplier's: Fair Labor Policies

MERIDIAN

— CACAO CO. —

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Meridian Cacao: Fair Sourcing Overview

Meridian Cacao Company practices a Direct Trade program, an incentive based reward system that focuses on paying farmers well beyond Fair Trade prices for quality of cocoa. Meridian understands a farmer's efforts are the most critical factor in exceptional chocolate, and farmers who maintain the best crops should be paid for their valuable work. Compared to selling in conventional markets, extra care must be taken during all stages of cocoa farming: from harvesting pods at the right moment to adjustments in fermentation and drying during all weather conditions. Because of these realities, Meridian has yet to pay less than four times the "Fair-Trade Premium" for cocoa beans. In return, the quality of cocoa is elevated and the farmer's profitability is increased. Direct Trade fosters high-impact relationships between producers and buyers. Meridian frequently travels to partner farms throughout the year. Founder Gino Dalla Gasperina personally facilitates the process, touring farms, escorting chocolate makers on cocoa sourcing trips, getting to know the farming staff and ultimately working to improve cocoa quality with the producers.

Meridian Cacao: Fair Sourcing Standards

1. Direct relationships: We have direct relationships with the producers we buy cocoa from. We visit their farms at least once a year and communicate with them frequently throughout the year. We only work with producers that ensure fair and responsible labor practices and treat all workers with dignity and respect.
2. Fair pricing: We negotiate cacao prices directly with producers to ensure the prices they receive for their cacao enable a just standard of living. In 2017, we never paid less than 200% the global market price for cocoa.

3. Environmental Standards: We choose to work with cacao producers that value the environment and work to maintain the biodiversity of their land while keeping their workers healthy and safe.



Zorzal Cacao
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Transparency and Direct Trade

At Zorzal Cacao we are USDA organic certified work primarily in the direct trade arena where we are transparent in how we source our beans, who we source from, and prices. Many of our chocolate makers visit our farm so they can have a direct understanding of how we operate, and of the agricultural and labor practices that we employ.

Staff Wellbeing

All employees receive fair wages, health benefits, and vacation time. Furthermore more we invest heavily in education. Each year a percentage of our budget goes towards our Education Exchange Programs. Last year we organized a trip to Ecuador so that staff could visit multiple farms and fermentaries and learn about cacao production at scale. The exchange was essential in having the staff learn by doing and witnessing first hand.

Monitoring and Evaluation

We do annual reviews for both the company and the employees to understand how we can support the employees and ways they can improve, gain knowledge at their job.



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ECOM AGROINDUSTRIAL CORP. LTD. 1 Modern Slavery Statement:

ECOM Agroindustrial Corp. Ltd (“ECOM”) is proud of the steps it has and continues to take to combat slavery and human trafficking in its business and supply chains. It is a fundamental policy of the ECOM group (the “ECOM Group”) to conduct its business with honesty and integrity and in accordance with the highest legal and ethical standards. We are a global commodity trading and processing company specializing in coffee, cocoa and cotton, in major producing and consuming countries, with ancillary agricultural operations in speciality commodities. ECOM has its head office in Switzerland but operates in over 40 countries with over 5,400 permanent employees worldwide.

We acknowledge that we operate worldwide in a number of high risk countries for modern slavery and human trafficking. In addition, we employ temporary and seasonal workers which further increase the risk of us operating a supply chain susceptible to modern slavery or human trafficking. We continuously work with our business partners and clients around the world to eliminate modern slavery or human trafficking from our supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING:

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In order to become the preferred buyer for our suppliers and preferred seller for our clients ECOM seeks to comply with applicable laws and to work with farmers to improve crops over a long term relationship. This goes hand in hand with compliance of modern slavery laws around the World. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our managers are responsible for ensuring that employees under their supervision are

familiar with our policies and for promoting compliance. Our policies state that the ECOM Group will not employ forced labour, which is defined as involuntary or compulsory labour, such as indentured labour, bonded labour or similar labour-contracting arrangements. We make enquiries of our suppliers about the possibility of its existence within the supply chain and work to eliminate the same. Together with a number of international companies, ECOM is part of a strategy to improve the livelihoods of farmers and their economic opportunities by increasing productivity and ECOM AGROINDUSTRIAL CORP. LTD. 2 advancing community development. The focus on improving communities will help to reduce any instances of modern slavery.

OUR TRAINING:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff through SMS programs at origin level together with other points in the supply chain. SMS looks to improve farmer yields through improving farming practices and/or the introduction of certifications or traceability programs. Not only does certification or verification improve farmer profits but it also allows our customers to rely on the traceability of the cocoa and coffee beans in their supply chains.

OUR DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING:

As part of our initiative to identify and mitigate risk we have in place a Social Environmental Management System (SEMS) to ensure that our: sustainable practices are aligned with and support our business objectives; own facilities are compliant with legal requirements and international expectations; procurement supports improvement in production and discourages unsustainable and inappropriate practices. We anticipate and mitigate negative social and environmental consequences of our business and that affect our business. SEMS is a farm management tool used globally on an annual basis within ECOM to assess environmental, safety and social compliance of owned or operated locations and details on environmental and social issues in the supply chain. If there are any issues relating to modern slavery at ECOM owned or operated locations or within a supply chain these should be flagged through SEMS.

OUR SUPPLIERS' ADHERENCE TO OUR VALUES:

ECOM has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a Supplier Code of Conduct which highlights our commitment to eradicate modern slavery and the expectation on our suppliers to maintain the same high standards. By accepting our Supplier Code of Conduct, ECOM is entitled to audit a supplier's practices to ensure

compliance. ECOM will avoid buying from and selling to parties discovered to be acting in violation of national environmental and social legislation (specifically including improper labour practices).

SUSTAINABILITY AND TRACEABILITY:

Certification or verification against widely accepted schemes for sustainable agriculture is viewed by ECOM as one of the most effective ways to advance the supply of sustainable products. ECOM works with certification schemes and encourages the development of supply of certified production. This enables ECOM to be confident that suppliers certifying ECOM AGROINDUSTRIAL CORP. LTD. 3 sustainable practices are using ethical and accepted methods; for example, Fairtrade strictly prohibits slave and child labour. Our SMS program looks to expand the use of certifications and traceability primarily within the cocoa markets but also in coffee. The SMS programs look to recruit farmers to programs backed by ECOM and it's clients. Through SMS programs at origin level SMS looks to improve farmer yields through support, provision of equipment thus improving farming practices and/or the introduction of certifications or traceability programs. Not only does certification or verification improve farmer profits through increased premiums but it also allows our customers to rely on the traceability of the cocoa beans in their supply chains. The SMS programs focus on certification and/or traceability which allows transparency of our SMS supply chains and a way to eliminate modern slavery and human trafficking from our supply chains.

WHISTLEBLOWING:

ECOM has a procedure in place for resolving complaints (both internal and external), including those relating to modern slavery. ECOM will process any such complaint in line with this procedure. It is our stated intent that complainants be acknowledged and taken seriously; there is a mechanism in place to allow for the protection of a complainant and for any complaint to be made anonymously.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING:

We use the following indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains: Each year an internal audit is conducted to ensure that local policies align with ECOM Group policies. Spot checks for suppliers in higher risk countries; on the basis that it is not feasible to audit every supplier. We are satisfied of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains and we intend to continue these steps to continue to combat slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, the Trade Facilitation and Trade Enforcement Act 2015 and the

California Transparency in Supply Chains Act 2010, and it constitutes the ECOM Group's slavery and human trafficking statement for the financial year ending 31 December 2016. ECOM Agroindustrial Corp. Ltd Date: 24 May 2017