

Due Diligence System



Tradin Organic is a global company in the organic food industry and with that, takes responsibility of its social and environmental impact across its supply chains. We are committed to a responsible and transparent way of doing business and believe that this is crucial for stable, long-term, and sustainable access to our ingredients. This includes sustainable purchasing practices, long-term supplier relationships, collaboration with rights holders, working towards living income and living wages, and providing for or cooperating in remediation where appropriate.

OUR POLICIES

This document outlines Tradin Organic's overall Human Rights and Environmental Due Diligence (HREDD) System, based on the [OECD Guidance for responsible business conduct](#). This system is a continuous, risk-based process that helps us identify, prevent, mitigate and account for adverse human rights and environmental impacts in our supply chains.

All employees of Tradin Organic and its entities globally sign the [Acomo Code of Conduct](#), a group policy set by the holding company Acomo N.V. The group has two additional policies: the [Acomo Human rights Policy](#) and [Acomo Environmental Policy](#). There is a grievance mechanism and [Whistleblower Policy](#) covering all internal and external stakeholders. Tradin Organic has developed two specific Sourcing Policies for additional measures in supply chains associated with risk, for its own sourcing activities as well as when sourcing through local partners:

- The **Ethical Sourcing Policy (ESP)** to protect farmers and workers in our supply chains.
- The **Deforestation-free Sourcing Policy (DSP)** to protect forests in countries of origin.

These policies are also incorporated into our **Supplier Code of Conduct (SCoC)**, which is a document all suppliers of Tradin Organic must sign as part of our initial Vendor Approval Process and again as part of a re-approval every 3 years.

OUR PUBLIC TARGET

By 2030, Tradin Organic aims to ensure that 100% of its high-risk Tier-1 suppliers are audited against human rights and environmental management requirements. Progress is reported through the Acomo Annual Report, prepared in line with EU CSRD requirements and subject to limited assurance, and published on the Group's [website](#). We provide further detail in our own annual Impact Report, available on our own [website](#).

IDENTIFICATION AND ASSESSMENT

We use the Sedex [Platform](#) to continuously assess social and environmental risks and impacts in our supply chains. We use the Pre-assessment, Country/region and sector risk to identify the inherent risks per supplier (determined by a multitude of information sources) and where available the site-specific risks (based on a supplier's SAQs and SMETA audit reports, if they are active on the Sedex Platform). We supplement these insights with our Sustainability Questionnaire, part of our mandatory Vendor Approval Process and input from our (local) staff from direct engagement with suppliers. In line with our DSP and when deforestation risk assessments are required, we use Osapiens.

For suppliers categorized as high-risk, Tradin Organic requires transparency and assurance in a way that it deems appropriate to the situation, including whether there is a direct or indirect relationship with the producers. The goal is either:

- **Certification** or auditing by an independent third party, or
- **Verification** by Tradin Organic staff of information provided through our supplier questionnaires.

The two Sourcing Policies further specify the conditions and requirements. Both policies state that in case we cannot verify a sufficient level of transparency and assurance of compliance by a supplier, the **consequences may include ceasing the business relation**. Risk assessments are updated at least every 3 year, more often when deemed relevant.

PREVENTION, REMEDIATION AND REGENERATION

Tradin Organic's way of working is not only identifying risks and mitigating them, but also actively working together with sourcing communities and suppliers, to ensure responsible conduct throughout the whole value chain. We are known for our technical assistance projects through our not-for-profit entity Organic Development Services, aimed at improving farmers' and producers' livelihoods and overall ecosystem resilience. We start our projects with identifying root causes of the risks or impacts identified. We then address these through projects, that for example focus on setting up organizational structures such as farmer cooperatives, Farmer Field Schools or village saving and loan associations (VSLA's), and providing knowledge, certification guidance, training, machinery, planting materials, agroforestry designs and/or organic inputs. We strive to include specific attention to identification of vulnerable groups, gender equality and youth empowerment.

For a current overview, see our [website](#).

TRACKING AND COMMUNICATION

Tradin Organic closely monitors the status and progress of its supply base and publicly reports the certified and verified share on an annual basis. On request, findings and supplier status can be shared with clients, so they can integrate these reports into their own due diligence system and comply with applicable regulation.

Tradin Organic also reports on various ESG and impact indicators to its holding company Acomo N.V. on a quarterly basis. This includes the volume of products that are certified and the number of suppliers that are certified or audited. Acomo reports on progress on group level in the group's Annual Report (available on the [website](#)).

GRIEVANCE MECHANISM

As explained in our Group [Whistleblower Policy](#), all stakeholders of Tradin Organic and its suppliers, both internally and externally, can report perceived or suspected breach of any of the Codes and Policies referenced in this document. The formal grievance mechanism [SPEAK UP!](#) is freely accessible through our website, with the option to submit a report anonymously. The platform is communicated to employees through our handbooks, through posters on locations and in the annual Sustainability Training. The grievance mechanism is also explicitly mentioned in our Supplier Code of Conduct, mandatory to sign for all suppliers. Any reports through the platform are received by the Compliance Officer at Acomo N.V., who will follow up accordingly and keep the reporter updated on any actions taken. The number and status of grievances reported through the group mechanism are disclosed in the Acomo Annual Report (available on the [website](#)).

GOVERNANCE

The Global Sustainability Manager acts as central HREDD lead & Compliance Officer, collaborating with all Tradin Organic group entities to ensure awareness, understanding, and implementation of the HREDD system. The Tradin Organic Board of Directors (CEO and CFO) holds ultimate responsibility and accountability for all due diligence processes.

For questions and comments, please contact us at sustainability@tradinorganic.com