

POLICY ON SUSTAINABLE AND ETHICAL BUSINESS

The Group's objective is to deliver acceptable returns to its shareholders whilst improving the sustainability of its practices and the welfare of its employees.

This policy applies to all the Group's Indonesian operations. The Group's employees, contractors, consultants, smallholders, vendors, suppliers, and guests are required to adhere to the policy. This policy is freely available on the Group's website and is updated periodically to adapt to changes in applicable regulation and standards. It relates to:

- Transparency and grievances
- Occupational safety and health
- Quality
- Anti-bribery and corruption
- Responsible employment
 - Modern slavery
 - Payment of a living wage
 - Access to housing and affordable food
 - Sexual harassment
 - Equal opportunities and anti-discrimination
 - Child protection
 - Worker co-operatives
- Labour rights
 - Freedom of association
 - Forced labour
 - Reproductive rights

Transparency and grievances

The Group's approach to transparency is based its value of integrity. The Group discloses information about itself on a full and timely basis other than where such information is commercially sensitive. As such:

- i) The Group will respond systematically to requests for information not already available through the group's website (www.mpevans.co.uk), annual reports or other publications, whilst being mindful of its obligations not to breach personal privacy or confidentiality;
- ii) The Group will respond sympathetically and in a timely fashion to grievances or complaints.

Occupational safety and health

Evans Group Indonesia acknowledges the importance of creating a healthy and safe work environment for all employees, contractors, consultants, smallholders, vendors, suppliers, and guests of the company.

- i) All Group companies will carry out and regularly revise risk assessments of their operations to identify where such risks exist and what mitigating measures should be put in place.
- ii) All employees will receive formal safety training, refreshed from time to time.
- iii) The Group will provide all employees standardised personal protective equipment based on the nature of their work, and make employees accountable in ensuring the proper usage, inspection and maintenance of personal protective equipment provided.
- iv) The Group will provide access to adequate health care and emergency medical services to all employees.
- v) The Group will provide all employees with workplace accident insurance to cover the costs of treating injuries occurring as a result of work-related incidents.
- vi) The Group will provide annual medical surveillance for employees deemed to be potentially at risk of exposure to toxic substances.

- vii) The Group will not use- pesticides categorised by the World Health Organisation as Class 1A or 1B, or those that are listed by the Stockholm or Rotterdam Conventions, unless under exceptional circumstances, following independent advice.
- viii) The Group will not use paraquat.

Quality

The Group aspires to the quality of its output and management of its plantations being regarded as a reference point for the industry.

- i) The Group will train competent personnel to enable them to improve performance continuously.
- ii) The Group will comply with applicable national rules and regulations as well as relevant international standards.

Anti-bribery and corruption

The Group is committed to conducting its business around the world with the highest degree of integrity. This Group will not tolerate any form of bribery or corruption.

- i) The Group will take active steps to ensure that its directors, employees, officers, affiliated entities, joint venture partners and agents do not engage in any form of bribery or other corrupt activity.
- ii) The Group will not make facilitation payments.
- iii) The Group will ensure that any entertainment or small gifts to third parties are recorded and neither constitute, nor risk being perceived as constituting, bribery.
- iv) The Group will protect any whistle blowers who report suspected bribery or corruption from adverse consequences.

Responsible employment

Modern slavery

The Group is committed to acting ethically and with integrity in the way it conducts its business and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in the Group or in any of its suppliers or business partners.

- i) The Group will communicate clearly its approach to tackling modern slavery to its employees and suppliers.
- ii) All staff will receive training on how to identify and report modern slavery.
- iii) The Group will support anyone who raises genuine concerns in good faith concerning modern slavery and will ensure they do not suffer any detrimental treatment, irrespective of whether they turn out to be mistaken.
- iv) The Group may terminate its relationship with any individuals or organisations working on its behalf if they breach its policy on modern slavery.

Payment of a living wage

The Group intends to pay its employees a living wage, measured in relation to country where they are employed.

- i) The Group will pay all employees a wage equal to or exceeding the local legal minimum wage.
- ii) The Group will ensure workers are free to resign from its employment without penalty.
- iii) The Group prohibits the charging of recruitment fees to work, contract substitution, excessive and involuntary overtime, debt bondage and the withholding of wages of workers.
- iv) The Group will not retain the certificates, identity documents or passports of its employees.

Temporary or migrant workers

The Group's objective is for its core activities to be performed by permanent, full-time employees.

- i) The Group will limit casual, temporary and day labour to jobs that are temporary or seasonal, or during initial development or replanting.
- ii) The probationary period of permanent employees will not exceed the maximum allowable in the country employment; the Group will not issue temporary work contracts to effect extended periods of probation.
- iii) All basic benefits and prohibitions that are applicable to permanent workers apply to temporary workers, as well as additional national laws and regulations pertaining to casual and temporary employees.

Access to housing and affordable food

Evans Group Indonesia aims to providing comfortable housing with access to basic services for its workers, in well-maintained residential areas.

- i) The Group will provide decent housing to employees who require it.
- ii) The Group will ensure that its housing areas have access to clean and drinking water, and to affordable essential foods.

Sexual harassment

Sexual harassment is unwanted behaviour of a sexual nature which violates an individual's dignity, makes them feel intimidated, degraded or humiliated, or creates a hostile or offensive environment. The Group is strongly committed to creating and maintaining a working environment that is free from sexual harassment.

- i) The Group will thoroughly investigate cases of sexual harassment in any of its operations reported to it.
- ii) The Group will refer any case of sexual harassment that is well founded to the appropriate authorities for legal action; where proven, it will take firm action, such as termination of employment, against any of its employees found guilty of this offence.

Equal opportunity and anti-discrimination

The Group aims to provide fair and equal opportunities to all its workers. It seeks to prevent discrimination in the workplace. As such:

- i) The Group will provide equal opportunity for all workers to obtain work and decent income and to develop their careers, without discriminating on the basis of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age;
- ii) The Group assigns all workers according to individuals' expertise, merit, abilities, skills, and experience, as well as the Group's needs;
- iii) The Group will not tolerate any gender-based discrimination, such as limitation of roles, labelling, violence, intimidation, and excessive workload;
- iv) The Group will at all times comply with the law on discrimination in the process of dismissal, employment terms and conditions, pay and benefits, promotion and transfer opportunities, training, recruitment and redundancy.

Child Protection

The Group recognises that children who are made to work, or who choose to work, are deprived of their rights to a childhood and education and are at risk of endangering their physical, mental and social well-being.

- i) The Group prohibits the use of child labour in all its own operations and by its suppliers.
- ii) The minimum age of employment in the Group is 18 years, with the exception of work that is part of school curriculum.
- iii) The Group permits the work of persons aged 14-17 only where this is agreed by a statutory authority and forms a part of the school curriculum, or their participation in a certified vocational orientation or training programme.
- iv) Contractors, contracted workers and volunteers that work with the Group are subject to its minimum age restrictions.
- v) As proof of age, one of these documents needs to be presented to the Group during recruitment; birth certificate, family card, school certificate, identification card or passport.
- vi) The Group will provide access to quality childcare for employees' children and will extend the operational hours of on-site childcare facilities as required by workers who work overtime and at weekends.
- vii) The Group will provide access to a school, or transport to a school, for employees' children below 18 years.
- viii) The Group seeks to ensure that its housing areas in the plantations are safe for children and that work-related hazards like chemicals and related protective equipment are kept away from children at home.
- ix) The Group seeks to prevent sexual harassment, domestic violence and other forms of harassment against children in its housing and will employ intervention and remediation steps within the context of its operations while protecting the anonymity of the complainant and the victim when such cases occur.

Worker co-operatives

The Group promotes the establishment of co-operatives intended to support employee welfare.

- i) Where requested by a group of more than 20 employees, the Group will provide administrative support to establish and run a worker co-operative.
- ii) The Group allows workers to become members of a worker co-operative of their own free will, without coercion from any party.

Labour rights

Freedom of Association

The Group respects workers' right to freedom of association and to organise with other individuals and collectively express, promote, pursue and defend common interests.

- i) The Group provides the opportunity for all workers to establish free, open, independent, democratic, and responsible workers' unions and to register the union with the relevant statutory authority.
- ii) The Group provides all workers the choice to be members of a workers' union or not, without any coercion from any party whatsoever.
- iii) The Group acknowledges the right of employees to peaceful, legal assembly.

Forced labour

The Group will ensure that its operations do not constitute or support modern slavery or human trafficking. As such:

- i) The Group prohibits illegal, forced or compulsory labour and overtime. All time worked, including overtime, will be recorded and wages paid for each of the Group's employees;

- ii) The Group prohibits the use of corporal punishment, mental or physical coercion, physical constraints, excessive verbal abuse, intimidation, harassment by the management or employees.

Reproductive Rights

The Group will protect women's reproductive rights according to the law of the country where they are employed:

- i) The Group will grant special dispensation to female workers who are suffering from menstrual pains, are pregnant, or are nursing in accordance with the rules and regulations of the country where they are employed;
- ii) In its operating subsidiaries, the Group will provides guidance and education on reproductive health and fertility to workers and their families with the assistance of professional medical staff;
- iii) The Group will not permit pregnant employees, breastfeeding women or other people that have medical restrictions to remain in high-risk work that poses a threat to the
- iv) mother/person and/or child such as heavy lifting, operating heavy machinery and handling chemicals such as pesticides, herbicides, fertilizers, and laboratory chemicals;
- v) The Group will assign pregnant employees to suitable interim work; it will not use employee's reproductive rights such as the terms of pregnancy, giving birth, miscarriage, nursing and other reproductive conditions, as grounds for demotion or dismissal;
- vi) The Group will not permit the use of pregnancy testing as a discriminatory measure.

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