

ETHICAL BUSINESS POLICY

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ETHICAL BUSINESS POLICY

M.P. Evans Group PLC (“the Group”) aims to conduct its business with the highest degree of integrity and is committed to uphold an ethical work environment.

All of 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:

- Human rights
- Transparency and grievances
- Occupational safety and health
- Quality
- Anti-bribery and corruption
- Whistleblowing
- Modern slavery
- Payment of a living wage
- Sexual harassment
- Equal opportunities and anti-discrimination
- Child protection
- Worker co-operatives
- Freedom of association
- Reproductive rights

Human rights

The Group respects all internationally recognised human rights and freedoms as expressed in the:

- Universal Declaration of Human Rights (UDHR);
- the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- Fundamental ILO Conventions;
- Guiding Principles of the UN Convention on the Rights of the Child;
- UN Declaration on the Rights of Indigenous Peoples;
- UN Food and Agriculture Organization (FAO) Voluntary Guidelines on the Responsible Governance of Tenure.

The Group applies the UN Guiding Principles on Business and Human Rights to identify, prevent, mitigate, and remedy human rights issues.

Transparency and grievances

The Group discloses information about itself on a full and timely basis, other than where such information is commercially sensitive, and will respond sympathetically and in a timely fashion to grievances or complaints.

- 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 provides clear grievance mechanisms for anyone to raise a concern, problem, or complaint and will handle complaints, grievances and conflicts responsibly and in a timely fashion, through open and constructive engagement with complainants and stakeholders.

Occupational safety and health

The Group is responsible for creating a healthy and safe work environment for all employees and for anyone entering company premises, including contractors, consultants, smallholders, vendors, suppliers, and guests.

- i) All Group companies will carry out and regularly revise the risk assessments of their operations to identify where such risks exist and what mitigation measures should be put in place.
- ii) All employees will receive formal safety training refreshed periodically.
- iii) The Group will provide all employees with standardised personal protective equipment based on the risk assessment of the work and require all employees to be accountable in the proper usage, inspection and maintenance of the 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 from work-related incidents.
- vi) The Group will provide annual medical surveillance for high-risk employees deemed at risk of exposure from hazardous materials and conditions.
- vii) The Group will not use pesticides that are prohibited by the Indonesian Government, 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 and will not tolerate any form of bribery or corruption. The Group has a detailed Anti-Bribery and Corruption Policy [ABC policy](#) which applies to all directors, employees, officers, affiliated entities, joint venture partners and agents of the Group.

- 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 permit inappropriate or illegal 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.

Whistleblowing

The Group has a detailed Whistleblowing policy [Whistleblowing policy](#) to encourage a culture of openness and accountability and to help the Group detect and address any wrongdoing as soon as possible. Through the implementation of this policy:

- ii) The Group will provide a mechanism for any employee who suspects wrongdoing within the company to raise their concerns.
- ii) The Group assures confidentiality and protection from reprisals, victimisation or harassment.

Modern slavery

The Group is committed to implementing and enforcing effective systems and controls to ensure modern slavery (including human trafficking) is not taking place in the Group or in any of its suppliers or business partners. The Group has a detailed Anti-Slavery and Human Trafficking Policy [Anti slavery policy](#) As part of its efforts to ensure the Group is not associated with modern slavery or human trafficking:

- 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 Anti-Slavery and Human Trafficking Policy.

Forced labour and human trafficking

Any form of forced labour or human trafficking is prohibited.

- i) 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
- ii) The Group will not retain the certificates, identity documents or passports of its employees
- iii) 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.
- iv) The Group prohibits the use of corporal punishment, mental or physical coercion, physical constraints, verbal abuse, intimidation, harassment by management or other employees.
- v) The Group will ensure workers are free to resign from its employment without penalty.

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 and will maintain consistent records of worker hours and wages.
- ii. The Group will provide housing with access to basic services for its estate workers, in well-maintained residential areas.
- iii. The Group will ensure that its housing areas have access to clean and drinking water, and to affordable essential foods.

- iv. The Group will determine living wages using a credible methodology and close living wage gaps to pay all workers a wage that is sufficient to afford a decent standard of living for the worker and their family.

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.

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 is committed to enhancing employees' awareness of sexual harassment and fostering a workplace environment that values respect and inclusivity.
- ii) The Group will thoroughly investigate cases of sexual harassment in any of its operations reported to it.
- iii) 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, and will make active efforts to protect the rights of children living around the Group's oil palm plantations,

- 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.
- ix) The Group seeks to prevent sexual harassment, domestic violence and other forms of harassment against children living on its estates and will investigate, intervene and take steps to protect complainants and victims of such harassment when it becomes aware of such incidents or allegations.

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.

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.
- iv) The Group will not intervene in any manner that is likely to inhibit workers from exercising their rights to freedom of association and collective bargaining.

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 provide 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 mother/person and/or child such as heavy lifting, operating heavy machinery and handling chemicals such as pesticides, herbicides, fertilisers, and laboratory chemicals.
- iv) 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.
- v) The Group will not permit the use of pregnancy testing as a discriminatory measure.