

ICAM S.P.A.

COCOA SUPPLIER'S CODE OF CONDUCT

Date: 31st January 2025

INTRODUCTION

This Code of Conduct is inspired by the Principles of ICAM S.p.A.'s Code of Ethics (hereinafter referred to as ICAM), and states its values into operational guidelines for full application within the context of relationships with cocoa suppliers. It supplements the ICAM Code of Ethics without altering or superseding any contractual provisions in force with the Supplier.

Respecting the role and independence of each party, the ICAM Group defines expectations in commercial relationships, informing cocoa suppliers of its commitment and engaging them in the sustainability journey. The goal is to create transparent and resilient supply chains that respect human rights, the environment and product safety and quality standards.

This document defines the essential minimum requirements expected from each Supplier: compliance with applicable national and international laws and contractual agreements, implementing proactive measures to prevent and mitigate the most significant negative impacts on human rights, labor rights, and the environment, while establishing remedial mechanisms should such impacts occur.

The ICAM Group encourages Suppliers to share this vision and apply it in their own supply chains, to build ongoing commercial relationships based on the same core values and common regulatory standards. The signature and implementation of the Code of Conduct are fundamental criteria for supplier qualification according to ESG criteria and purchasing selection standards.

The key points of ICAM's responsible sourcing and the principles in this document are divided into sections according to the areas of impact:

- 1) Governance and integrity
- 2) Human right protection
- 3) Environment protection
- 4) Product safety and quality standards

For each area, the most relevant issues for the ICAM Group are outlined, identified through a materiality analysis. The applicability of the requirements and practices is relative to the type of business of the cocoa suppliers and follows the local specifics of each one.

The **Cocoa Supplier Code of Conduct of ICAM S.p.A.** is inspired by the principles of the company's Code of Ethics, providing operational guidelines for relationships with cocoa suppliers. The aim is to create transparent and resilient supply chains that respect human rights, the environment and product safety and quality standards. Suppliers are required to adhere to this Code of Conduct and to hand over it along their supply chain through a Due Diligence process to identify ESG risks and negative impacts generated by their activities and to reduce and mitigate such impacts by adopting appropriate measures, programs and procedures.

1. Governance and integrity

- **Integrity and legality:** respect for laws, honesty, transparency and responsibility in all business activities.
- **Frauds and illegal acts:** avoid fraud, embezzlement and other illegal actions.
- **Anti-corruption:** rejecting and preventing any form of corruption and bribery.
- **Transparency and conflicts of interest:** ensuring transparency in procurement processes and managing conflicts of interest.
- **Data management and confidentiality:** proper management of data and protection of confidential information.
- **Privacy protection:** ensuring compliance with GDPR and privacy laws.
- **Reporting procedures:** mechanisms for reporting and resolving disputes.



2. Human rights protection

- **Human rights and social practices:** respect for cultural, religious, economic, and social rights.
- **Child protection and prohibition of child labor:** ensuring no child labor exploitation.
- **Indigenous people's rights:** respect for the rights of indigenous communities.
- **Modern slavery and forced labor:** opposing all forms of forced labor.
- **Working hours:** compliance with working hours laws ensuring time for rest and relaxation.
- **Fair wages:** compliance with laws ensuring fair employee compensation.
- **Freedom of association:** respect for the right to collective bargaining for workers.



- **Fair prices and living income:** recognition of compensation aligned with market values.
- **Diversity and inclusion:** promotion of diversity and prevention of discrimination and harassment.
- **Gender Equality:** ensuring equal opportunities for women and men, reducing discrimination.
- **Health and safety:** providing a safe and healthy working environment in line with ILO conventions.
- **Food Security:** ensuring that farmers meet their food needs.
- **Self-Determination capacity:** promoting farmers' ability to organize themselves.
- **Human rights impact of environmental issues:** recognizing environmental protection as essential to safeguarding human rights.



3. Environment protection

- **Deforestation:** ensuring compliance with the EUDR for the prevention and mitigation of deforestation.
- **Biodiversity:** commitment to prevent deforestation and promote biodiversity.
- **Chemical product management:** responsible use and management of chemical products.
- **Soil Quality:** measures to preserve soil quality and water resources.
- **Greenhouse gas emissions reduction:** actions to reduce climate-altering gas emissions.
- **Waste management:** implementation of good practices for waste management.



4. Products safety and quality standards

- **Safety and Quality Standards:** ensuring cocoa products safety and quality.
- **Critical Issue Management:** immediate reporting and management of any quality or safety issues.



SUMMARY

INTRODUCTION	2
1. REGULATORY REFERENCES AND INSPIRATIONAL PRINCIPLES FOR THE CODE	6
2. SCOPE OF APPLICATION	6
3. DUE DILIGENCE PROCESS AND ENGAGEMENT RULES	7
4. GOVERNANCE AND INTEGRITY	7
i. Business integrity and lawfulness	7
ii. Fraud and illegal acts	8
iii. Anti-corruption and anti-bribery	8
iv. Transparency and conflict of interest management	9
v. Traceability, data management and privacy	9
vi. Privacy protection	9
vii. Reporting, conciliation, and remedy procedures (Whistleblowing and Grievance)	10
5. HUMAN RIGHTS PROTECTION	10
i. Human rights and social practices	10
ii. Child protection and prohibition of child labour	11
iii. Protection of indigenous people's rights	11
iv. Modern slavery and prohibition of forced, compulsory and irregular labour	12
v. Working hours	12
vi. Fair wages	12
vii. Freedom of association and right to collective bargaining	13
viii. Fair prices and living income	13
ix. Diversity and inclusion, fair treatment, prohibition of discrimination and harassment	13
x. Gender equity	14
xi. Health and safety	14
xii. Food Security	14
xiii. Farmers' capacity for self-determination	15
xiv. Human rights impact of environmental issues	15
6. ENVIRONMENT PROTECTION	16
i. Prohibition of deforestation, degradation and conversion of forests	16
ii. Biodiversity	16
iii. Chemical product management	17
iv. Soil quality	17
v. Greenhouse gas emissions reduction	17
vi. Waste management	18
7. PRODUCTS QUALITY AND SAFETY	18
i. Product safety and quality standards	18
ii. Management of critical issues	18
8. UPDATES AND REVIEWS	19
9. SUPPLIER'S COMMITMENT	19

1. REGULATORY REFERENCES AND PRINCIPLES INSPIRING THE CODE

The Cocoa Supplier Code of Conduct is based on laws, regulations and universal relevant principles, considered essential by ICAM and upon which it intends to base its commercial relationships:

- Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite declaration of principles concerning multinational enterprises and social policy (ILO MNE Declaration)
- ILO International Labour Standards on Occupational Safety and Health
- ILO Centenary Declaration for the Future of Work

- The Rio Declaration on Environment and Development
- European Deforestation-free products Regulation (EUDR 2023/1115)
-
- 2030 Agenda for Sustainable Development
- Women's Empowerment Principles
- Children's Rights and Business Principles
- United Nations Declaration on the Rights of Indigenous Peoples
- OECD Guidelines for Multinational Enterprises
- United Nations Convention Against Corruption
- International Covenants on Civil and Political and Economic, Social and Cultural Rights

Furthermore, as a founding member of the UN Global Compact Network Italy, ICAM is inspired by:

- UN Global Compact Ten Principles
- UN Guiding Principles on Business and Human Rights (UNGPs)
- Business Manifesto for People and Society

With reference to the Laws, this refers to the system of international, national, regional and/or local laws and regulations.

2. SCOPE OF APPLICATION

This Code of Conduct applies to all operators who supply cocoa, in the form of beans and derivatives, to any company of the ICAM Group. It also applies to their employees, partners, subcontractors and workers in the supply chain (farmers).

The ICAM Group is aware that the proper implementation of the Code requires ongoing collaboration and planning, scaled according to the risks associated with the activities of each Supplier.

ICAM hopes that adherence to the Code is not seen merely as a contractual obligation, but also as a set of guidelines to integrate sustainability into the supply chain and jointly set increasingly ambitious goals.

3. DUE DILIGENCE PROCESS AND ENGAGEMENT RULES

The Supplier commits to hand over this Code of Conduct along their supply chain and to conduct a Due Diligence process to identify and assess their actual or potential impacts, taking the necessary actions to ensure alignment with the objectives of the Code.

The Supplier commits to identify the ESG risks listed in this Code and any negative impacts its activities may generate or contribute to generate on its stakeholders.

Based on the results of its Risk Assessment, the Supplier implements appropriate behaviors to prevent, reduce and mitigate impacts, ensuring that all its sub-suppliers apply the same compliance obligations.

The Supplier must take measures to inform its employees, collaborators and sub-suppliers of the principles stated in the Code, with appropriate actions to ensure understanding and respect for the principles here below.

Programs, procedures and processes that can support the Supplier in this objective include:

- establishing an effective management system, which includes policies, mechanisms for due diligence, and for the reporting and resolution of complaints, sharing procedures with a focus on transparency;
- sharing with ICAM the programs for the implementation of the Code and collecting evidence of its implementation;
- complying with all applicable laws and regulations in the countries where the Supplier operates;
- storing documentation related to communication and any assessments, results and/or actions under this section for at least 5 years, unless a longer period is required by the contract or applicable law.

The Supplier may undergo a periodic Due Diligence process regarding full compliance with the Code throughout the entire supply chain.

The Supplier is aware that failure to comply with the Code may result in specific sanctions - ranging from the request to implement remedial action plans to suspension or termination of the business relationship with the ICAM Group.



4. GOVERNANCE AND INTEGRITY

The Supplier implements the following behaviors in its business conduct and requires and verifies their application with all its sub-suppliers.

i. Business integrity and lawfulness



The Supplier:

- always operates in full compliance with the relevant laws, both at its legal headquarters and in the locations where cocoa is produced and delivered;
- operates in accordance with applicable tax legislation;
- holds the necessary authorizations and licenses required by law to carry out its activities, including land rights;
- relies on the most relevant international standards related to the principles described in the Code;
- acts with fairness, honesty, transparency and responsibility in all business activities and in relationships with business partners, public officials and other third parties, including the Local Community;
- conducts negotiations in a professional manner, ensuring fair processes for selecting sub-suppliers;
- respects confidentiality and intellectual property rights;
- adopts and maintains business practices in compliance with antitrust laws, avoiding involvement in price-fixing, market-sharing agreements, production limitations, collusive bidding, unfair competition agreements with competing third parties, and abuse of dominant market position.

ii. Frauds and illegal acts



The Supplier:

- avoids and does not tolerate practices related to any form of fraud, embezzlement, bankruptcy offenses, illegal payments or other illegal actions;
- where required, provides *pre-shipment* analysis and samples that are fully representative and compliant with the supplied batch;
- ensures that the documentation received from its sub-suppliers and forwarded to ICAM is created with fairness and truthfulness, has not been manipulated or falsified and that the declarations are accurate;
- keeps financial records that reflect all transactions accurately, fairly and timely, in accordance with generally accepted accounting principles.

iii. Anti-corruption and anti-bribery



Both in relations with public officials and between private individuals, the Supplier rejects and prevents any form of active and/or passive corruption, whether carried out directly or indirectly, in any context, form or manner, even if such activities are acceptable in practice, tolerated or not prosecuted.

The Supplier is prohibited from:

- offering or accepting any type of bribe or illegal incentive offered to gain advantages or benefits;
- carrying out acts of intimidation, blackmail or extortion;
- being involved in money laundering schemes.

iv. **Transparency and conflict of interest**



The Supplier:

- ensures maximum transparency in the information necessary for procurement processes, avoiding the provision of false or misleading information and omitting relevant information that could influence decision-making processes related to the qualification and assignment of a contract;
- prefers direct relationships with the contracting company, avoiding intermediaries and clearly stating, prior to any relationship, the presence of any potential conflicts of interest;
- promptly discloses any situation that is or could appear to be in conflict with the interests of the contracting company, in order to manage and resolve the situation appropriately.

v. **Traceability, data management, and privacy**



The Supplier:

- traces the origin of its products, sharing the list of its sub-suppliers, geolocation and data required by the EUDR, updating them whenever changes occur or at least annually, and retaining the essential documents and data according to the database agreed with ICAM;
- shares with ICAM, prior to each shipment, the batch data and traceability information required by the EUDR;
- actively engages its supply chain to comply with the obligations set out by the EUDR, increasing transparency and traceability;
- keeps adequate records of its business and administrative activities, particularly accounting, to ensure compliance with laws and generally recognized business practices;
- treats confidential information with full respect for the business relationship and privacy laws.

vi. **Privacy protection**



The Supplier:

- manages confidential information in compliance with the GDPR (General Data Protection Regulation) and privacy laws in the jurisdictions where it operates, as well as with applicable best practices;

- safeguards the right to privacy of its stakeholders, obtaining informed consent and using the personal data collected only for defined and appropriate purposes;
- ensures the protection of personal data processed, both its own and third parties' ones, by adopting appropriate procedures such as security measures (including cybersecurity), training for those authorized to process data and identifying privacy roles within its activities;
- prevents unauthorized access by third parties.

vii.

Reporting, conciliation and remedy procedures (Whistleblowing and Grievance)



The Supplier: is required to report to ICAM any potential violation of this Code of Conduct, using good judgment to determine whether the report is appropriate, evaluating its severity and the potential impact on the supply chain.

The Supplier must communicate through the channels provided by the Grievance and Whistleblowing policy:

- the **online platform accessible** at the link <https://icamcioccolato.whistleblowing.it/>, through which the following can be made:
 - **written reports**
 - **oral reports** by requesting an interview with the Reporting Manager
- **dedicated email address**: grievance@icamcioccolato.it for submitting electronic reports.
- the **ICAM contact person**, if appropriate.



The platform will allow the whistleblower to track his/her report.

According to ICAM's policies, Whistleblowing reports will be managed by the Supervisory Body, while Grievance reports will be managed by a multidisciplinary committee. Both types of reports will be managed with the utmost privacy, fairness, transparency and expertise, evaluating them based on the chance and potential impact of the risks.

ICAM will promptly investigate any reported issue and discuss the findings with the relevant Supplier. If necessary, ICAM reserves the right to request corrective actions, clear deadlines and binding commitments for any implementation plans.

Reports received and classified as "Whistleblowing Reports" will be processed, in terms of receipt, analysis and management in compliance with the legal provisions of Legislative Decree No. 24 of March 10, 2023.

Likewise, the Supplier will take the necessary measures and actions to create their own reporting mechanism for their supply chain.

5. HUMAN RIGHTS PROTECTION

i. Human rights and social practices



The Supplier is required to respect:

- the minimum standards recognized at the national, regional, international level and/or the regulations established at the local level;
- the cultural, religious, economic and social rights of local communities, minorities, indigenous populations and other vulnerable groups, taking into account the operational context and the activities carried out;
- the dignity of the individual, avoiding physical or humiliating sanctions and punishments, as well as sexual, verbal, physical or psychological violence or abuse in the workplace and committing to prevent and eliminate such abuses.

ii. Child protection and prohibition of child labor



The Supplier recognizes children's rights, such as the right to education, play and basic needs. It commits to not exploit any form of child labour in managing its activities and supply chain, respecting ILO definitions and national laws regarding the minimum working age and employment in hazardous work, in line with corporate principles and children's rights. The minimum working age corresponds to the age at which compulsory education is completed.

The Supplier adopts the necessary measures to identify, prevent and address child labour issues, that include:

- preventing any form of child labour, even in the supply chain;
- ensuring that minors are not exposed to work that could jeopardize their physical or mental health, safety or morals, including overtime and night shifts;
- respecting the maximum working hours allowed for each age group;
- monitoring that involvement in "light" work, as permitted by the ILO, does not interfere with education.

The Supplier is required to implement management systems to identify, prevent and address the risk of child labour in its supply chains. In the event that cases of child labour are identified, the Supplier must take the necessary corrective actions:

- immediately remove the minor from the harmful situation, ensuring that such measures do not worsen the well-being of the minor and his/her family;
- commitment with local governments, NGOs and other stakeholders to address the underlying issues contributing to child labor;
- identifying ways to remediate the risk.

iii. Protection of indigenous people's rights



The Supplier guarantees to ICAM that its economic activities will not compromise the rights and well-being of any indigenous communities within its area of operation, while promoting sustainable and responsible practices:

- recognizes and respects the rights of indigenous peoples, including land rights, territory and natural resources, as established by the United Nations Declaration on the Rights of Indigenous Peoples;
- obtains the free, prior and informed consent of indigenous communities before undertaking any activity that may impact indigenous territories;
- ensures that its activities do not harm the cultural, spiritual or environmental heritage of indigenous communities, including the protection of their traditional practices and natural resources;
- guarantees that indigenous peoples are not discriminated in any way and that they have equal opportunities to participate in decision-making processes affecting them;
- establishes effective mechanisms allowing indigenous communities to submit complaints and obtain compensation in case of violations of their rights.

iv. Modern slavery and prohibition of forced, compulsory and irregular



The Supplier opposes forced labour, as defined by the ILO, and condemns the use of all forms of forced or compulsory labour at every point in the value chain, including irregular labor, modern slavery, human trafficking, and debt slavery.

The Supplier ensures that its employees:

- begin the employment relationship on a voluntary basis and have the right to terminate it with a reasonable notice period;
- enjoy freedom of movement, without being subjected to physical restrictions, abuse, threats or practices such as the retention of identity documents and valuable goods;
- are informed of their working conditions;
- are hired in compliance with applicable laws and are regularly paid.

v. Working hours



The Supplier acknowledges the right of employees to rest and leisure time and ensures compliance with:

- applicable laws and ILO Conventions regarding working hours and weekly rest, incorporating them consistently into its labor policies;
- any collective agreements regarding working hours and paid holiday;
- the maximum limit of overtime hours per week or month allowed by local laws and/or collective labor agreements;
- the balance between business needs and personal needs;
- the right to sick or parental leave, vacation and any other paid or unpaid leave, as defined by the laws.

vi. Fair wages



The Supplier operates in full compliance with national laws regarding minimum wage, and in particular:

- recognizes all employees a fair wage complying with applicable ILO Conventions, sufficient to meet the basic needs of employees and ensure a decent standard of living for them and their families;
- defines salary agreements based on global principles, reflecting local market practices and value, and in compliance with the business and legal requirements established by the laws;
- ensures wage equity under equal merit conditions, determining compensation solely based on the skills, experience, professional potential of individuals and their achieved results;
- adequately compensates overtime hours, which must be voluntary.

Deductions from wages as a disciplinary measure are not allowed, except within the limits set by current regulations and local collective agreements, so as not to undermine the employee's right to terminate the employment relationship. Furthermore, employees are not required to cover recruitment related expenses.

vii. Freedom of association and right to collective bargaining



The Supplier acknowledges the rights of its employees regarding ILO conventions on freedom of association, collective bargaining and workers' representation, ensuring:

- the right to choose their representatives and to be represented, without fear of intimidation or retaliation;
- the right to collective bargaining;
- clear and fair working conditions within a contract written in the language(s) required by local regulations, providing fair compensation, sustainable working hours, parental leave, vacation, a healthy and safe environment and in compliance with applicable agreements.

viii. Fair prices and living income



ICAM recognizes the right of all workers – regardless of their role within its supply chain – to receive compensation sufficient to cover their basic needs for themselves and their families.

Therefore, the Supplier is required to recognize fair prices, linked to cultivation costs and aligned with market value.

ix. Diversity and inclusion, fair treatment, prohibition of discrimination and harassment



Respect for diversity, equity and inclusion is an integral part of ICAM's culture and values. We firmly believe in acceptance, tolerance and empathy, considering differences as a valuable contribution to growth and improvement.

ICAM requires the Supplier to adhere to ILO Conventions on discrimination and to take actions aimed at identifying, preventing and reducing discrimination through initiatives focused on:

- promoting proactive measures to create work environments that value diversity, talent and the contribution of each individual to the organization, including fixed-term and temporary workers as well as seasonal workers;
- condemning and preventing any form of discrimination (based on ethnicity, religion, geographic origin, social origin, color, gender, political opinion or any other condition that could lead to discrimination), ensuring equal opportunities for all and providing an inclusive and non-discriminatory work environment, with particular attention to vulnerable categories, including migrant workers, indigenous workers, people with disabilities, youth, the elderly and women;
- condemning and preventing any harassment, inappropriate or disrespectful behavior, such as physical and verbal abuse and sexual harassment in the workplace;
- ensuring that all stages of the working life – including internships, decisions regarding remuneration, assignment of responsibilities, training and career advancement – are determined solely based on skills, experience, professional potential and achieved results;
- ensuring pay equity under equal merit conditions.

x. Gender equity



ICAM recognizes the importance of ensuring equal participation of women and men in work activities.

The Supplier commits to:

- prevent and reduce discrimination, including in relationships with farmers;
- promote gender equality in all its operations and business relationships;
- ensure that women have equal opportunities for hiring, training, promotion and compensation;
- ensure the active participation of women in decision-making roles, enabling them to express their full potential.

xi. Health and safety



ICAM requires full compliance with current health and safety regulations in the workplace and is committed to provide the necessary organization and resources, including information and training activities, to monitor, manage and prevent risks associated with the work activity.

The Supplier commits to develop a sustainable health and safety culture for all its collaborators, including occasional workers, and to:

- comply with the ILO Convention on health and safety, international, regional and national standards, as well as with commitments made to third parties;
- provide a safe and healthy work environment that includes, at a minimum, access to potable water, lighting, temperature control, ventilation and adequate sanitary facilities;

- identify, proactively assess and manage health and safety risks, with the goal of preventing accidents and occupational diseases;
- implement appropriate controls, safe working procedures, adequate maintenance and prevention and protection devices and tools;
- ensure preparation for emergency situations, including proper arrangements, signage and communication of emergency procedures;
- providing regular training.

The Supplier will strive for continuous improvement and the application of best practices.

xii. Food security



ICAM intends to deal the issue of food security with its Suppliers, understood as the availability of food for self-consumption by farmers.

In this code, we share the behaviors ensuring farmers can produce enough food to meet their own dietary needs, thereby contributing to the food security of their families and local communities:

- allocate a portion of the land for agricultural production for the self-consumption of farmers' families, thereby reducing dependence on external sources;
- promote sustainable agricultural techniques increasing productivity and sustainability, such as organic farming and agro forestry systems, improving crop yields and ensuring a constant food supply for farmers' families;
- ensure that farmers have access to essential resources such as quality seeds, water and agricultural tools to ensure their ability to produce for self-consumption;
- offer training programs for farmers on efficient and sustainable farming techniques, resource management and food preservation, as knowledge is a key element in improving food security;
- promote actual access for farmers to a sufficient quantity of food;
- collaborate with local authorities and non-governmental organizations to develop policies and allocate subsidies that support farmers' food security.

xiii. Farmers' capacity for self-determination



In managing its supply chains, ICAM believes that the ability to cooperate is essential to achieve the best common outcomes, and for this reason, it aims to establish an equal relationship with its stakeholders. The ability to self-determine and organize is a fundamental element for this equal relationship, as well-structured organizations are able to negotiate fair terms.

ICAM asks its Suppliers to apply the same considerations in their relationships, to respect self-determination and to promote the organizational capacity of farmers:

- encouraging farmers to form cooperatives, associations or groups that can represent their collective interests, improving access to markets, resources and training opportunities;
- stimulating farmers to develop organizational and managerial skills, such as financial management, crop planning and marketing techniques;
- facilitating access to essential resources such as quality seeds, fertilizers and agricultural tools;
- promoting investment in infrastructure that supports farmers' activities, such as warehouses and collection centers, to reduce post-harvest losses and improve product quality.

xiv. **Human rights impact of environmental issues**



The Supplier recognizes that environmental protection is essential for the full enjoyment of human rights.

It commits to preserve the natural habitat of cocoa farmers and soil fertility, as a foundation for safeguarding the livelihoods of local communities. Additionally, it will ensure that no displacement of the population occurs due to cocoa cultivation.

6. ENVIRONNEMENTE PROTECTION

ICAM believes that the ecosystem is a shared resource and aims to protect it by balancing economic initiatives with environmental and social needs, always considering the rights of future generations. ICAM is committed to reduce the environmental impact of its activities, optimizing the use of energy and natural resources and preventing risks to people and the environment in general.

ICAM intends to integrate environmental sustainability principles into its supply chain, and for this reason, it requires its Suppliers to commit to the implementation of this Code of Conduct.

i. **Prohibition of deforestation, degradation and conversion of forests**



ICAM is committed to the full implementation of the European Deforestation-free Products Regulation (EUDR 2023/1115): starting from the implementation of the EUDR, it will stock exclusively products and raw materials from land that has not been subject to deforestation after 31st December 2020, that does not come from protected areas and that has been produced in compliance with all applicable regulations.

In line with this deadline, the Supplier will commit to:

- adopt the necessary measures to ensure that its cocoa has not directly contributed to, nor is involved in, any form of deforestation;
- implement traceability systems to ensure that all cocoa can be traced back to its origin, as required by

the regulation;

- adopt due diligence measures to verify the legality and sustainability of its cocoa, ensuring compliance with all applicable international, national, federal, state or local laws and regulations;
- acknowledge reports regarding alerts and the identified risk level;
- develop risk mitigation plans across the supply chain, incorporating sustainability practices to ensure compliance with the EUDR Regulation;
- provide periodic and transparent reports on practices and the supply chain, as well as the measures taken to ensure compliance with the regulation.

When starting new activities or at the expansion of existing ones, the Supplier must not expand into forests or protected areas and must obtain all the necessary authorizations and approvals as required by law, keeping documentation related to the land-use history.

The Supplier shall undergo an annual Due Diligence process for EUDR compliance and will be required to provide the relevant documentation. ICAM reserves the right to subject the Supplier to audits, including third-party audits.

ii. Biodiversity



The Supplier will take the necessary measures to ensure that biodiversity is preserved in all its activities and throughout the entire supply chain:

- preventing the excessive exploitation of natural resources;
- actively contributing to the protection of natural ecosystems, biodiversity, and ecosystem services;
- promoting restoration efforts;
- mitigating the impacts of its operations.

When starting new activities or expanding existing ones, the Supplier will commit to protect areas of high conservation value and promoting biodiversity.

The Supplier will prioritize and promote organic and sustainable farming, as well as cultivation practices that preserve biodiversity, ensuring that business activities and production processes do not have negative impacts on biodiversity.

iii. Chemical products management



The Supplier commits to:

- strictly adhere to the use of products allowed by any applicable certification protocols;
- not use chemicals considered harmful to the environment and/or people or that can be used in a dangerous manner;
- define and verify the implementation of procedures for the responsible management of chemicals throughout the supply chain, with attention to impacts on people and the environment;

- practice and promote limited use of chemical inputs in the supply chain;
- raise awareness, educate and train supply chain workers on the correct use of chemicals, the use of PPE (personal protective equipment), proper storage and disposal;
- keep supporting documents related to the management and use of chemicals, providing them when required.

iv. Soil quality



The Supplier commits to:

- take the necessary measures to preserve soil quality and minimize its impact on it;
- practice and promote good agricultural practices throughout their supply chain and with farmers;
- implement composting and the reuse of organic matter;
- minimize the impact on water resources;
- promote regenerative agriculture to enhance biodiversity and carbon sequestration.

v. Greenhouse gas emissions reduction



The Supplier commits to:

- adopt, where possible, the necessary measures to minimize emissions and the impact on air quality;
- implement practices to monitor and reduce its ecological footprint, with particular attention to:
 - o energy consumption and energy saving;
 - o waste management;
 - o the use of chemical inputs;
 - o "Land use change" practices.

Upon ICAM's request, the Supplier will provide the calculation of the greenhouse gas footprint of the supplied cocoa and/or the data needed to calculate it, considering both its own operations (Scope 1 and Scope 2) and upstream and/or downstream activities (Scope 3), according to internationally recognized standards, referring to the GHG Protocol.

vi. Waste management



The Supplier commits to:

- adopt the necessary measures to minimize waste production and the consumption of natural resources;
- implement good waste management practices, reducing its ecological footprint and promoting the circular economy.

7. PRODUCTS QUALITY AND SAFETY

i. Product safety and quality standards



The Supplier commits to ensure that the cultivation, processing, storage and transportation of cocoa are carried out responsibly, in line with food safety standards.

The Supplier must:

- implement strict quality control processes to ensure that the cocoa is safe and free from defects;
- work to maintain the certifications it holds;
- ensure that all products, materials and services provided to ICAM meet the agreed requirements and specifications and comply with all applicable laws and regulations;
- maintain complete traceability of products and production processes to ensure transparency and accountability.

ii. Management of critical issues



The Supplier is required to immediately inform ICAM if it becomes aware of any facts or suspicions that may indicate a regulatory, quality, safety or labeling issue with the supplied products.

The Supplier will strive to pursue continuous improvement and apply best practices.

8. UPDATES AND REVIEWS

This Supplier Code of Conduct may be updated and reviewed to reflect the lessons learned from the continuous improvement process.

The Supplier Code of Conduct has been translated into various languages for ease of reference.

The current version of the Supplier Code of Conduct and its translations are also available on the website.

www.icamcioccolato.com

9. SUPPLIER'S COMMITMENT

ICAM promotes long-term relationships with its Suppliers, with a focus on partnership and supporting a fair, sustainable, and transparent supply chain.

By signing this Code of Conduct, the Supplier:

- agrees and accepts to comply with the above engagement rules, which are a fundamental prerequisite for the business relationship with the ICAM Group;
- accepts to implement the due diligence process, which may include self-certifications, online assessments, risk and impact evaluations, data collection, as well as providing certifications, accreditations and/or documents demonstrating compliance with this Supplier Code of Conduct;
- accepts that ICAM or a third party authorized by ICAM may conduct announced or unannounced audits/inspections in accordance with the commitments, agreements or contracts entered into with ICAM;
- shall send this Code of Conduct to its sub-suppliers, implementing a due diligence process along the entire supply chain for its employees, agents, subcontractors, suppliers and sub-suppliers as far as they are involved in providing goods and/or services to ICAM.

Date

Signature
