

Corporate Responsible Agricultural Commodities Supply Policy

1. Introduction

At Trans-Oil Group of Companies, we recognize our responsibility to ensure that the agricultural commodities we source are produced in a sustainable and socially responsible manner. This policy outlines our commitment to working with suppliers who adhere to ethical and environmentally sound practices throughout their supply chains.

2. Commitment to Responsible Sourcing of Agricultural Commodities

We are committed to sourcing agricultural commodities such as grains and oil seeds from suppliers who demonstrate adherence to our sustainability and social responsibility criteria. This policy applies to all suppliers, contractors and partners involved in the production, processing and transportation of agricultural commodities for Trans-Oil Group of Companies operations.

3. Key Principles

Our Responsible Agricultural Commodities Supplier Policy is based on the following key principles:

- a. **Compliance with Standards and Regulations:** We require our suppliers to comply with all applicable laws, regulations and applicable international standards related to agriculture, labor, environmental protection and human rights. This includes but is not limited to, compliance with local agricultural laws, forest protection regulations and labor rights conventions.
- b. **Sustainable Agriculture Practices:** We prioritize suppliers who implement sustainable agricultural practices, such as regenerative agriculture, Integrated Pest Management (IPM), soil health management, water conservation and biodiversity protection. Suppliers should minimize the use of chemical inputs, adopt agroforestry practices where feasible and promote sustainable land management techniques.
- c. **Deforestation-Free Commitment:** We require suppliers to commit to zero-deforestation practices, including no conversion of natural ecosystems such as forests, peatlands or other high conservation value areas for agricultural purposes. Suppliers should adhere to the principles of the High Carbon Stock Approach (HCSA) and the High Conservation Value (HCV) approach.
- d. **Social Responsibility:** We expect suppliers to uphold social responsibility standards, including fair labor practices, respect for human rights and compliance with local community rights and customs. Suppliers should provide safe working conditions, fair wages and opportunities for community engagement and development.
- e. **Traceability and Transparency:** We prioritize suppliers who can provide full traceability of their agricultural commodities back to the farm or plantation level. Transparency in supply chain operations, including disclosure of sourcing locations, suppliers, production practices and crop protection products use is essential to verify compliance with our standards.
- f. **Continuous Improvement:** We encourage continuous improvement among our suppliers through capacity building, training programs and collaborative initiatives. We support suppliers in adopting best practices, implementing certifications (e.g., RSPO, Fair Trade, Organic) and enhancing sustainability performance over time.

4. Implementation and Monitoring

We implement this policy through the following measures:

- **Supplier Assessments and Due Diligence:** We will conduct screenings, assessments and due diligence to evaluate potential and existing suppliers against our sustainability and social responsibility criteria.

- **Supplier Engagement:** We will engage with suppliers to communicate our expectations, provide guidance on compliance and foster partnerships based on shared values and goals.
- **Monitoring and Auditing:** We will conduct regular monitoring, audits and site visits to verify compliance with our policy requirements and identify areas for improvement.
- **Collaboration and Partnerships:** We will collaborate with industry stakeholders, NGOs and certification bodies to promote best practices, share knowledge and address common challenges in agricultural supply chains.
- **Documentation and Reporting:** We will maintain accurate records of supplier performance, audit findings and progress towards sustainability goals. We will report on our supply chain transparency and compliance efforts to relevant stakeholders.

5. Reporting and Accountability

We commit to transparency in our supply chain practices by regularly reporting on our progress and performance related to responsible agricultural commodities sourcing. We hold ourselves accountable to our stakeholders through open communication, stakeholder consultations and responsive grievance mechanisms.

6. Review and Continuous Improvement

This policy will be reviewed periodically to ensure its relevance and effectiveness. We are committed to adapting to new scientific findings, market demands and regulatory requirements, and continuously improving our approach to responsible sourcing of agricultural commodities.


7. Conclusion

At Trans-Oil, responsible sourcing of agricultural commodities is a core stone that guides our actions and decisions. We are dedicated to promoting sustainable agriculture, protecting natural resources and fostering social responsibility throughout our supply chain.

Responsibility for the successful implementation of this policy belongs to every Trans-Oil Group of Companies relevant employee, at each level and function within the Company.

As Chairman of the Board of Directors and as being authorized for this purpose by the Board of Directors corporate resolution dated 1 July, 2025, I approve this Responsible Agricultural Commodities Supply Policy, and I am committed to upholding it and improving our responsible sourcing of agricultural commodities practices.

Approved:


Vaja Jhashi
Chairman of the Board of Directors

1 July, 2025

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