

## California Supply Chain Transparency Act Disclosure

June 2021

Olam is a leading food and agri-business supplying food, ingredients, feed and fibre to 17,300 customers worldwide. Our value chain spans over 60 countries and includes farming, processing and distribution operations, as well as an estimated sourcing network of 5 million farmers (direct and indirect procurement).

Olam, which includes Olam Americas, Inc. and Olam West Coast, Inc., as well as its subsidiaries Universal Blanchers LLC, Olam Peanut Shelling Company, Inc., Olam Farming, Inc. and Hughson Nut, Inc., is committed to providing a workplace where all employees are treated with dignity and fairness, and to respecting the rights of people and communities where we operate. We have zero tolerance for slavery, forced labor or human trafficking in our organization and our supply chains.

This disclosure sets out examples of verification, audit, certification, internal accountability, and training deployed by Olam to help identify, eliminate and prevent abuses across our value chains, and in the markets, where we operate.

### **Sustainability is integral to our Purpose**

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Respecting labor and human rights is an intrinsic part of Olam's Purpose of Re-imagining Global Agriculture and Food Systems to enable prosperous farmers, thriving rural communities and healthy ecosystems to coexist.

Across our business and our [supply chains](#), we are committed to protecting human rights, providing a workplace where all employees are treated with dignity and fairness, and to respecting the rights of people and communities.

We acknowledge the role we can play and we are committed to playing our part to work with other stakeholders – industry, government and NGOs – to tackle discrimination, eliminate unsafe and illegal labor practices for children and adults, promote fairness and equality, champion inclusion and diversity, while improving the livelihoods of farmers and communities.

### **Verification**

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In addition to complying with local laws and statutory requirements in individual countries where we operate, we have embedded human rights within our Policies including our [Fair Employment Policy](#) and our [Code of Conduct](#) which are in line with the Conventions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. We are also a signatory to the [UN Global Compact](#).

As part of our due diligence process to develop a more detailed understanding of human rights risks across our supply chain, together with Wageningen University, we developed a model to assess human rights risks at a country and commodity level based on the ILO Declaration on fundamental principles and rights at work (ILO, 2016). The model was applied to 33 countries and 19 commodities in both our own and third-party supply chains, which is enabling us to better understand country and commodity level risks in our supply chains and to identify appropriate actions where required.

<b>Name of Policy</b>	<b>Date published/revised</b>
<a href="#">Code of Conduct</a>	March 2019
<a href="#">Olam Supplier Code</a>	April 2018
<a href="#">Fair Employment Policy</a>	September 2018
<a href="#">Living Landscapes Policy</a>	April 2018
<a href="#">Sustainable Palm Policy</a>	January 2019
<a href="#">Plantations, Concessions and Farms Code</a>	July 2015

## **Certification**

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We recognize the importance of working with our suppliers to develop supply chains that respect people and human rights. [Olam's Supplier Code](#) sets out our expectations for sourcing raw materials, products and services in an ethical, socially responsible and environmentally sustainable manner and in compliance with all relevant applicable laws and regulations.

Our Supplier Code of Conduct sets out a comprehensive set of conditions which include:

- Being strictly prohibited to use child labor. It is a prerequisite to comply to the International Labor Organization (ILO) Convention 138 on the Minimum Age of Employment and Convention 182 on the Worst Forms of Child Labor;
- Being strictly prohibited to use forced, involuntary and slaved labor, including bonded, indentured and involuntary prison labor; as well as trafficked human beings;
- Creating an inclusive work environment that avoids any form of discrimination. All forms of harassment, including sexual harassment, intimidation, and abuse or threat are not permissible;
- Acknowledging employees' rights to form and join unions or other associations, and to bargain collectively; unless prevented by local applicable laws;
- Providing fair wages and benefits that are in accordance with applicable laws, industry standards or related agreements;
- Complying with all applicable ILO standards, national legal requirements and industry standards pertaining to working time;
- Providing a safe and hygienic work environment and accommodation (when the case may be) in accordance with applicable health and safety laws and international conventions;
- Preventing accidents and injury arising out of, associated with, or occurring in the course of work, by minimizing causes of hazards in the work environment;
- Encouraging gender equality, equal access and empowerment of women.

## **Audit**

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Suppliers signing our Supplier Code may be subject to announced inspections to ensure compliance. Where remediation measures are required, we work with suppliers to develop and implement corrective action plans. Any supplier found to be in breach of these standards and who does not commit to, and implement, remediation measures may be subject to suspension.

## **Internal Accountability**

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We have an established [Grievance Procedure](#) in place to report and address breaches of relevant Olam Policies or Codes . This Procedure applies to our own operations and third-party suppliers to enable concerns to confidentially raised about breaches of our policies. Feedback and inputs from all our stakeholders are important to drive improvements and best practices, as well as increasing transparency in our supply chains. All grievances are logged and investigated with status updates, and actions, reported.

## **Training**

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Conducting business in an ethical, socially responsible and environmentally sustainable manner must be embedded in every aspect of Olam’s business. To strengthen our ethical and compliance standards, we have established the Olam Ethical Business Programme (EBP), which supports learning and training to ensure employees understand the standards and behaviors expected and detailed in the Olam Code of Conduct, as well as our specific policies regarding slavery and human trafficking. We continue to raise awareness and conduct training to build understanding amongst our employees and workers on human rights, as well as with our suppliers, and encourage them to speak up and raise concerns, without retribution. For those employees with direct responsibility of supply chain management, we also endeavor to ensure they receive appropriate training and resources. We report on our activities and progress in our Annual Report and Global Reporting Initiative Report.