**Supplier Code of Conduct Version 1.0, October 2024**

**1 Introduction**

Palmadex was established in 2015 and specializes in the export of African foods, agricultural products and raw materials from Nigeria and Africa, following the farm to factory model. Through efficient supply chains and logistics, Palmadex delivers products to our customers across the world. Quality and food safety are a priority but, we also take responsibility when it comes to sustainability. We aim to establish maximum integrity of our supply chain and to guarantee sustainable raw material flows, which is why the Supplier Code of Conduct has been established.

**2 Objective**

The purpose of this Code of Conduct is to improve the responsible conduct in the Agri supply chain. In general, Palmadex expects its suppliers to work in accordance with local and national laws. The overarching goal of this Code of Conduct is to increase awareness and encourage responsible business conduct in Palmadex supply chain; i.e. respecting legal requirements, human rights, labor rights and to protect the environment.

The requirements that have been included in this Code of Conduct are based on the UN Sustainable Development Goals, the OECD Guidelines for Multinational Enterprises as well as ILO conventions.

**3 Scope**

This Supplier Code of Conduct applies to all suppliers of Palmadex Group.

**4 Driving improvement in Palmadex’s supply chain**

Companies that deliver goods and services to Palmadex are encouraged to set up their own Code of Conduct and to include similar requirements as detailed in this Code of Conduct to expand the effect within the supply chain.

**5 All suppliers must be in compliance with applicable legal requirements**

All Palmadex’s suppliers must comply with applicable (inter)national and local laws and regulations.

**6 Human rights are supported and respected**

Palmadex expects its suppliers to support and respect the protection of internationally known human rights and to ensure that they are not involved in any human rights abuse or use forced, bonded or prison labor.

**7 No exploitation of children and young workers**

Palmadex’s suppliers must comply with applicable legislation with regards to the protection of children and young workers (see also point 5 of this Code of Conduct). We expect that children and young workers are protected from economic exploitation and from performing work that is likely to jeopardize their health and safety, interfere with their education or harm their development. Children and young workers shall not be employed at night or in hazardous conditions.

**8 Labor rights are respected**

8.1 Suppliers shall remunerate employees appropriately, and at least in line with minimum wages guaranteed by law, or in absence of such legislation, ensure employees receive at least a living income or minimum income, whichever is higher. A living income is defined as ‘the net income a household would need to earn to enable all members of the household to afford a decent standard of living’.

8.2 Suppliers must not engage in modern slavery and/or human trafficking. Human trafficking is defined as the trade in people and does not necessarily involve the movement of persons. Modern slavery is the severe exploitation of people for personal or commercial gain.

8.3 Suppliers shall respect employees’ freedom to form and/or join trade unions and collective bargaining. If this right, the freedom to association and collective bargaining, is restricted by law, then the company shall facilitate alternative means of independent and free association for bargaining for employees such as workers forums etc.

8.4 Suppliers must protect employees from discrimination, intimidation, oppression or harassment in any form. No harsh or inhumane treatment is permitted.

**9 Employees are protected against hazards inherent to the working environment**

9.1 Suppliers shall provide employees with a safe and healthy work environment and ensure at least access to potable water, sanitary facilities, fire safety facilities, first aid facilities, emergency procedures and provide required trainings to safely perform tasks. Where accommodation is provided is should be clean, safe and meet the basic needs of workers.

9.2 Suppliers shall ensure that employees’ are not endangered in any way due to the use of dangerous machinery, unsafe building structure or layout, or dangerous substances. Where serious or fatal accidents have occurred, suppliers shall be able to demonstrate that all appropriate steps have been taken to prevent similar accidents to occur in the future.

9.3.1 Suppliers shall not use dangerous substances, such as chemicals, when other, less dangerous substances, are available in the market. Chemicals as named in the Stockholm and Rotterdam Conventions shall not be used.

9.3.2 Suppliers shall use chemicals, and other dangerous substances, according to the suppliers’ instructions, as mentioned on the label of the chemicals.

9.3.3 Suppliers shall implement procedures for safe handling, movement, storage, recycling, reuse and disposal of dangerous substances.

9.4.1 Suppliers shall implement a procedure to ensure employees’ working hours comply with legislation, or in absence of legal requirements, with minimum standards applicable for the industry concerned. Employees shall not be required to work extreme hours without adequate rest periods. Suppliers shall maintain proper accurate employment records including calculation of pay and hours worked.

9.4.2 Suppliers shall ensure that working hours are not excessive.

**10 Ethical business practices are of paramount importance for Palmadex’s suppliers**

Suppliers shall prevent any form of extortion, embezzlement, corruption, money laundering and/or bribery to prevent unethical business practices.

**11 Palmadex’s suppliers shall do their utmost to protect the environment**

11.1 Suppliers shall make all reasonable efforts to protect the environment and to limit, as far as reasonably possible, the negative impact of their activities and products on the environment.

11.2 Suppliers shall implement procedures for handling, movement, storage, recycling, reuse and disposal of materials in such a way that the environment is protected, and the negative impact of their activities are limited.

11.3 Suppliers shall be in possession of relevant environmental permits, licenses and registrations necessary for its operations.

11.4 Suppliers shall not engage in activities for which High Conservation Value Areas, including but not limited to high carbon stock forests and peatlands, will be further developed. Conservation Value Areas (HCVAs) are natural habitats, which are of outstanding significance or critical importance due to their high biological, ecological, social and/or cultural values.

11.5 Suppliers shall make use of resources (e.g. water, electricity) in an appropriate manner and shall be reduced over time, as far as reasonably possible.

11.6 Waste generated from operations, industrial processes and/or sanitation facilities shall be monitored, controlled for and treated as required prior to (environmentally) safe discharge or disposal. The amount of waste shall be reduced or eliminated at the source, as far as reasonably possible, by optimizing (production) processes.

11.7 Suppliers shall implement practices, as far as reasonably possible, to reduce the Greenhouse Gas emissions resulting from its operations. It is Palmadex’s ambition to get insight in the Greenhouse Emissions generated in our supply chain.

**12 Verification of suppliers’ compliance with this Code of Conduct**

Palmadex will reach out to its suppliers, when we receive an indication of non-compliance with this Code of Conduct, to visit the supplier’s location to assess the situation. If non-compliance is detected, in mutual agreement a plan will be developed to implement adequate measures.

**13 Potential collaboration between Palmadex’s suppliers and Palmadex**

Palmadex is always looking for ways to improve the responsible conduct of its supply chains. As such, Palmadex is open to long-term partnerships with our suppliers: work together and improve the responsible practices in our joint supply chain. If you envision a partnership with Palmadex, please reach out to your normal contact person or Palmadex’s sustainability department (please find contact details in the footer).

If you believe that your company cannot comply with any of the requirements as mentioned in this Code of Conduct, please discuss this with your normal contact person or Palmadex’s sustainability department so that we can develop a joint program to improve the responsible conduct in our Agri supply chain.