

Due Diligence System



Trabocca is a global company, that takes responsibility of its social and environmental impact across its supply chains. We are committed to a responsible and transparent way of doing business and believe that this is crucial for a stable, long-term, and sustainable access to our ingredients.

OUR POLICIES

This document outlines Trabocca’s overall Due Diligence System, based on the [OECD Guidance for responsible business conduct](#). This system is a continuous process that helps identify risks relating to human rights, labor rights and the environment with a view to ending, preventing or mitigating those risks.

All employees of Trabocca sign the [Acomo Code of Conduct](#), a group policy set by the holding company Acomo N.V. The group also has two additional policies: the [Acomo Human rights Policy](#) and [Acomo Environmental Policy](#). There is a grievance mechanism and [Whistleblower Policy](#) covering all internal and external stakeholders. Trabocca has developed two specific Sourcing Policies for additional measures in supply chains associated with risk, for its own sourcing activities as well as when sourcing through local partners:

- The **Ethical Sourcing Policy** (ESP) to protect farmers and workers in our supply chains.
- The **Deforestation-free Sourcing Policy** (DSP) to protect forests in countries of origin.

These policies are also incorporated into our **Supplier Code of Conduct** (SCoC), which is document all suppliers of Trabocca have to sign as part of our initial Vendor Approval Process and again as part of a re-approval every 3 years.

RISK AND MANAGEMENT

We use the [Sedex Platform tool Radar](#) to continuously assess social and environmental risks in our supply chain. Radar creates a risk score per supplier based on inherent risks (determined by a multitude of information sources) and site characteristics (based on SAQs and SMETA audit reports). We supplement Radar with additional data sources like [Global Forest Watch](#) (Pro) and intel gathered by our local teams, including on regulatory developments.

The two Sourcing Policies further specify the conditions and requirements. Both policies state that in case we cannot verify a sufficient level of transparency and assurance of compliance by a supplier, the **consequences may include ceasing the business relation.**

TRACKING AND COMMUNICATION

Trabocca closely monitors the status and progress of its supply base and commits to publicly report the certified and verified share on an annual basis. On request, findings and supplier status can be shared with clients, so they can integrate these reports into their own due diligence system and comply with applicable regulation.

Trabocca also reports on various ESG and impact indicators to its holding company Acomo N.V. on a quarterly basis. This includes the volume of products that is certified and the number of suppliers that are certified or audited. Acomo reports on progress on group level in the group's Annual Report (available on the [website](#)).

PREVENTION, REMEDIATION AND REGENERATION

Trabocca's way of working is not only identifying risks and mitigating them, but also actively working together with sourcing communities and suppliers, to ensure responsible conduct throughout the whole value chain. Together with our sister company Tradin Organic, we are known for our technical assistance projects, aimed at improving farmers' and producers' livelihoods and overall ecosystem resilience. These projects focus on setting up organizational structures such as farmer cooperatives, Farmer Field Schools or village saving and loan associations (VSLA's), and providing knowledge, certification guidance, training, machinery, planting materials, agroforestry designs and/or organic inputs.

GRIEVANCE MECHANISM

As explained in our Group [Whistleblower Policy](#), all stakeholders of Trabocca and its suppliers, both internally and externally, can report perceived or suspected breach of any of the Codes and Policies referenced in this document. The formal grievance mechanism [SPEAK UP!](#) is freely accessible through our website, with the option to submit a report anonymously. The reports are received by the Compliance Officer at Acomo N.V., who will follow up accordingly and keep the reporter updated on any actions taken. The number and status of grievances reported through the group mechanism are disclosed in the Acomo Annual Report (available on the [website](#)).

For questions and comments, please contact us at sustainability@trabocca.com