



GOODHOPE ASIA HOLDINGS LTD. – SUSTAINABILITY POLICY DOCUMENT	
SUSTAINABILITY POLICY	
Document Code	GAHL.SP.0122
Date	28/07/2022

SUSTAINABILITY POLICY

Sustainable palm oil must be produced in a manner that is legally compliant and traceable, that protects natural ecosystems and biodiversity, and that respects the rights of indigenous peoples, workers, and local communities. Goodhope Asia Holdings Ltd. (Goodhope) made its pledge to No Deforestation, No Development on Peat, and No Exploitation (NDPE) in May 2017 and has since been working to enforce these principles both within its own operations and across the supply chain. The Group is a member of the Roundtable on Sustainable Palm Oil (RSPO) and adopts the RSPO Principles and Criteria (P&C) 2018 and all related guidance and requirements as applicable.

This policy applies to all of Goodhope's operations and subsidiaries, including all our palm oil mills, refineries, and plantations, and includes provisions for our associates, contractors, and third-party suppliers. It supersedes Goodhope's Sustainability Policy 2020.



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Respect for Human Rights

Goodhope respects internationally recognized human rights wherever it operates. The Group implements processes to identify, prevent, mitigate, and remedy human rights issues and impacts as outlined in the UN Guiding Principles on Business and Human Rights and encourages the application of these principles across its supply chains. All of Goodhope’s operations, subsidiaries, and suppliers must recognize and respect principles, rights, and freedoms as stated in Goodhope’s Human Rights Policy.

Ethical Conduct

Business is conducted with honesty, integrity, and good faith, respecting the rights and interests of all employees and other stakeholders.

Recruitment and Employment Standards

Goodhope and its suppliers must ensure fair and decent treatment of all jobseekers and workers and uphold all principles and rights expressed in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Fundamental ILO Conventions. Working conditions must comply with national and local laws and standards including those on health and safety, working hours, minimum wages, and overtime. These conditions apply to all workers, including temporary, seasonal, part-time, and migrant workers. All of Goodhope’s operations, subsidiaries, and suppliers must conduct business in compliance with Goodhope’s Ethical Conduct and Employment Standards Policy.

Environmental and Occupational Health and Safety

Goodhope’s operations, subsidiaries, and suppliers must comply with all applicable health and safety laws and promote a safe and healthy working environment for all employees, and any others who may be impacted by the working conditions or company activities. Measures shall be in place to protect from exposure to hazards and prevent accident, injury, or ill health as stated in Goodhope’s Environmental and Occupational Health and Safety Policy.

Conservation and Sustainable Land Use

Goodhope will not conduct any new development on High Carbon Stock (HCS) Forest, High Conservation Value (HCV) Areas, or peatland of any depth and is working to eliminate deforestation and conversion of other natural ecosystems from its supply chains. Land-use planning for the development of oil palm plantations or associated infrastructure follows the RSPO Procedures for New Plantings (NPP) to determine appropriate areas for development. The company is committed to maintaining and protecting important values including carbon storage, biodiversity, sources of water, and other resources that are important for sustaining the well-being of indigenous peoples and local communities. Best agronomic practices are utilized for soil, waste, and pest management and the Group promotes these practices



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within its supply chain and the broader industry. All of Goodhope’s operations, subsidiaries, and suppliers are expected to adhere to Goodhope’s Conservation and Sustainable Land use Policy.

Community Relations

Goodhope is committed to establishing and maintaining mutually beneficial relationships with the communities in and around its operating locations. Our aim is to contribute to the progressive realization of access to fundamental needs; food security; income security; adequate access to healthcare; and improved education. The Group supports the welfare and well-being of local communities and encourages sustainable social and economic development. All of Goodhope’s operations, subsidiaries, and suppliers are expected to comply with Goodhope’s Community Relations Policy.

Smallholder Support

Goodhope actively supports independent smallholders by facilitating their inclusion into the supply chain and by promoting practices that increase the productivity, profitability, and sustainability of smallholder-supplied commodities. Organized scheme smallholder (PLASMA) plantations are provided to increase the income and living standards of the local communities within and surrounding the company’s oil palm plantations.

Responsible Sourcing

No Deforestation, No Peatland, and No Exploitation (NDPE) commitments apply to all suppliers, contractors, and associates with whom we work with. To achieve a fully compliant supply chain, appropriate systems must be in place for responsible sourcing and the effective management of third-party supplier relationships. The sourcing of materials is managed and monitored in accordance with Goodhope’s Responsible Sourcing Policy.

Verification of Performance and Conformity to Standards

Verification processes are conducted according to the norms of good practice for credibility, rigor, and independence.

Continuous Improvement and Transparency

Recognized monitoring techniques are used to ensure the credibility and comparability of observations and findings, including processes to incorporate relevant information and perspectives from stakeholders. Accurate records shall be maintained and the outcomes of the monitoring and evaluation process are used to inform adaptive management decisions and drive continuous improvement. Sustainability performance and progress are disclosed in a manner that clearly communicates accurate and factual data and information.



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Stakeholder Feedback

Stakeholder participation is encouraged in business planning and decision-making processes. Stakeholders are provided opportunities to express their views and action is taken on the feedback received as part of continuous improvement processes. All queries and concerns shall be addressed in a timely, open, and honest manner.

Collaborations and Memberships

Goodhope will continue to be an active member of the RSPO and will engage in dialogues and collaborations with multiple stakeholders to help promote sustainable development of the palm oil sector in a more impactful manner. The Group supports landscape and jurisdictional approaches and embraces collaborative programs that seek to address key social and environmental challenges in the landscapes within which it operates.

Grievance Handling

Goodhope encourages responsible and amicable resolution of complaints, grievances, and disputes to prevent conflict escalation. The Group commits to having appropriate systems in place to allow stakeholders to lodge their complaints, provide mutually agreed remedies, and monitor the progress of resolution. Adequate documentary evidence of the resolution process, phases of negotiation, and settlement agreement must be maintained.



GOODHOPE ASIA HOLDINGS LTD. – SUSTAINABILITY POLICY DOCUMENT	
HUMAN RIGHTS POLICY	
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HUMAN RIGHTS POLICY

Goodhope respects internationally recognized human rights wherever it operates. The Group implements processes to identify, prevent, mitigate, and remedy human rights issues and impacts as outlined in the UN Guiding Principles on Business and Human Rights.

All of Goodhope's operations, subsidiaries, and suppliers are expected to comply with the following requirements:

Fundamental Rights and Freedoms

- Respect all rights and freedoms as expressed in the Universal Declaration of Human Rights (UDHR) including the rights to privacy, association, social security, and culture; freedom of expression; freedom from interference; and equal rights to work, health, and education.

Labor Rights

- Uphold all principles and rights expressed in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Fundamental ILO Conventions:
 - Employees have the right to join associations and unions and to collectively bargain.
 - Any form of forced, trafficked, or child labor is prohibited.
 - Discrimination is prohibited and equality of opportunity and treatment is promoted.

Women's Rights

- Prioritize the rights of female workers, adopting measures to promote protection and safety at work, and to provide equality in opportunity, treatment, pay, and representation.

Child Rights

- Make active efforts to protect children's rights, to help meet the basic needs of children living around our oil palm plantations, and to expand opportunities for children to reach their full potential in line with the Guiding Principles of the UN Convention on the Rights of the Child.

Community Rights and Rights of Indigenous Peoples

- Respect the human rights, values, and interests of local communities and indigenous peoples where its plantations are located.
- Uphold the inherent rights of indigenous peoples and their fundamental freedoms as expressed in the Articles of the UN Declaration on the Rights of Indigenous Peoples.



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- Consult and cooperate in good faith with indigenous peoples that may be impacted by company operations and understands that indigenous peoples have the right to maintain, control, protect, practice develop and revitalize their cultural traditions and customs.

Land Tenure Rights

- Recognize and respect all legal, communal, and customary rights to land ownership and the rights to use, manage and control land.
- Act with due diligence to avoid infringing on the legitimate tenure rights of others and identify, prevent, and address adverse impacts on legitimate tenure rights in accordance with the UN Food and Agriculture Organization (FAO) Voluntary Guidelines on the Responsible Governance of Tenure.

Free, Prior, and Informed Consent

- Uphold the right of indigenous peoples, landowners, and land users to free, prior, and informed consent (FPIC) in relation to project proposals that will impact their land or resources.
- Allow stakeholders to make objective decisions regarding proposed conservation and land-use plans, recognizing that any group or individual with landowner or land-user rights has the right to reject plans for development or conservation.
- Provide potentially affected landowners and land users with sufficient information and seek consent for the proposed plans through consultative and participative processes without the use of coercion, intimidation, or manipulation before commencing actions that may affect the land or resource rights of landowners or land users.

Access to Remedy

- Provide opportunities for stakeholders to raise complaints and respect all justified claims and entitlements of any group or individual.
- Reach mutually agreed remedy in a fair and participative manner.

Protection of Human Rights Defenders

- Recognize that any individual has the right to defend human rights and prohibit intimidation and retaliation against Human Rights Defenders.



GOODHOPE ASIA HOLDINGS LTD. – SUSTAINABILITY POLICY DOCUMENT	
ETHICAL CONDUCT AND EMPLOYMENT STANDARDS POLICY	
Document Code	GAHL.SP.0322
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ETHICAL CONDUCT AND EMPLOYMENT STANDARDS POLICY

Goodhope and its suppliers commit to conduct business with honesty, integrity and good faith; engage in ethical recruitment and employment practices; and ensure fair and decent treatment of all jobseekers and workers. Principles and rights expressed in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Fundamental ILO Conventions shall be upheld. Working conditions must comply with national and local laws and standards including those on health and safety, working hours, minimum wages and overtime. These conditions apply to all workers, including temporary, seasonal, part-time, and migrant workers.

All of Goodhope's operations, subsidiaries, and suppliers are expected to comply with the following requirements:

Transparency of job terms and conditions of employment

- Ensure that jobseekers receive accurate information about the available job, the nature of the work, rates of pay and pay arrangements, working hours, vacation and other leave benefits, all potential deductions from pay, and any other benefits they will receive in accordance with company policy and national law.
- Provide workers with written contracts in a language that they understand, with employment terms and conditions that are identical to the information given to them previously during the recruitment process.

No recruitment fees

- Prohibit recruitment fees to jobseekers: the costs of recruitment should be borne by the employer.

Equal opportunities

- Maintain a working environment free from discrimination and promote fair and unbiased treatment for all individuals regardless of gender, race, age, disability, religion, nationality or sexual orientation.
- Be compliant with the applicable equal employment opportunity laws during the processes of recruitment, training, promotion, compensation, and termination.



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No forced, trafficked, or child labor

- Prohibit any form of forced, trafficked, or child labor.
- Allow workers to enter into employment voluntarily and freely, without retention of identity documents or passports, debt bondage, or withholding of wages.

Working hours and wages

- Comply with national and local laws and standards on working hours, minimum wage, overtime, and annual leave.
- Maintain consistent records of worker hours and wages.
- Determine decent living wages using a credible methodology and close living wage gaps to pay all workers a wage that is sufficient to afford a decent standard of living for the worker and their family.

Prevention of bribery and corruption

- Prohibit bribery or other improper advantages for business or financial gain.
- Provide information and guidance for employees on how to recognize and prevent corruption or bribery issues and discourage all forms of conflicts of interest, manipulation, interference, coercion, or intimidation.

Employee engagement, participation, and representation

- Maintain good communications with employees by engaging in open and honest dialogues and value their contributions in generating ideas and solutions through involvement and participation.
- Allow employees to have the freedom of joining any form of association: the company will not intervene in any manner that is likely to inhibit workers from exercising their union rights.

Gender equity

- Consider and address the needs and interests of female employees to support equality in opportunities regardless of gender.
- Encourage women’s representation in worker committees.
- Implement practices to help overcome constraints faced by women and promote women’s inclusion and career progression.

Employee grievances

- Provide a mechanism for any employee to raise a concern, problem, or complaint at work.
- Enable grievances to be raised without fear of recrimination, reprisal, or dismissal.



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Whistleblowing

- Provide a mechanism for any employee who suspects wrongdoing within the company to raise their concerns.
- Assure confidentiality and protection from victimization or harassment.



GOODHOPE ASIA HOLDINGS LTD. – SUSTAINABILITY POLICY DOCUMENT	
COMMUNITY RELATIONS POLICY	
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COMMUNITY RELATIONS POLICY

Goodhope is committed to establishing and maintaining mutually beneficial relationships with the communities in and around its operating locations. The Group supports the welfare and well-being of local communities and encourages sustainable social and economic development.

All of Goodhope's operations, subsidiaries, and suppliers are expected to comply with the following requirements:

Respect for local laws and cultures

- Operate in a manner that respects the human rights, values, and interests of local communities and indigenous peoples, as well as the applicable laws and regulations of the provinces where the plantations are located.

Communication of information

- Provide local communities with accurate and factual information on the impacts and benefits of proposed projects before any corporate actions that affect land and resource rights.
- Communicate in a culturally appropriate, transparent, and gender-sensitive manner with local stakeholders and collaborate in good faith to understand and resolve any differences.

Negotiation and consent

- Negotiate mutually agreeable conditions prior to adopting and implementing corporate actions that may affect the land or resource rights of landowners or land users.
- Seek consent through consultative and participative processes without the use of coercion, intimidation, or manipulation.

Social impact management

- Work proactively with stakeholders to identify and manage social risks, impacts, and obligations, considering the values, needs, and concerns of local communities in areas where the company operates.

Community participation

- Seek community input on issues that impact or interest the community and involve local communities in decision-making processes.
- Provide business and employment opportunities among local communities.



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Grievance handling

- Provide opportunities for community members to express their concerns and respect any justified claims and entitlements of any group or individual.
- Work with concerned parties to seek solutions and reach a mutually agreed settlement to address any grievances involving local communities.



GOODHOPE ASIA HOLDINGS LTD. – SUSTAINABILITY POLICY DOCUMENT	
ENVIRONMENTAL AND OCCUPATIONAL HEALTH AND SAFETY POLICY	
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ENVIRONMENTAL AND OCCUPATIONAL HEALTH AND SAFETY POLICY

Goodhope’s direct operations, subsidiaries, and direct suppliers shall maintain a safe and healthy working environment for all employees, and any others who may be impacted by the working conditions or activities of the company. Measures shall be in place to protect from exposure to hazards and prevent accident, injury, or ill health.

All of Goodhope’s operations, subsidiaries, and suppliers are expected to comply with the following requirements:

Hazard control

- Identify all hazards in the working environment, determine the risk of accident, injury, or ill health due to the identified hazards, and implement measures to mitigate the associated risks.
- Monitor safety performance, investigate the causes of accidents and near-misses, and take action to improve the occupational health and safety management system and better control risks to health and safety.

Safety instructions, information, and training

- Provide all employees, visitors, contractors, and suppliers who enter company premises with the necessary information on health and safety matters such that they are aware of the risks and precautions to be taken.
- Provide all employees with clear instructions and adequate training to ensure they can safely carry out their work.

Employee consultation

- Consult with employees on matters affecting their health and safety.

Personal Protective Equipment

- Provide appropriate personal protective equipment (PPE) to sufficiently protect from identified hazards.

Plant and equipment safety

- Ensure that all machinery equipment, appliances, and tools are well-maintained and regularly inspected.
- Ensure that the relevant qualifications and registrations, and licenses are held by workers.



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- Ensure relevant permits and/or licenses are held to operate such plant or equipment as per national law.

Chemical handling and hazardous materials management

- Store, handle and transport Hazardous chemicals and materials safely according to recognized best practices, national law, and specific product information following the respective Classification, Labelling, and Safety Data Sheet of Hazardous Chemicals.
- Train employees in the safe use, storage, handling, and potential hazards of chemical materials.
- Ensure that adequate PPE and sanitation facilities are available for those applying pesticides.
- Prohibit the use of paraquat and adopt recommendations and guidelines by the World Health Organization (WHO) for the exclusion of highly hazardous pesticides listed as Class 1A or 1B chemicals, or those subject to the Stockholm or Rotterdam Conventions.

Waste management

- Manage all waste responsibly according to the type of waste, the handling, storage and disposal requirements of the waste.

Water, sanitation and hygiene

- Implement a water quality management program and ensure compliance with national regulations.
- Meet the accepted standards of hygiene and sanitation by promoting good housekeeping practices, waste management, and availability of clean water at all emplacements.

Road safety

- Implement road safety programs to increase awareness and safety in areas where there is a risk of on-site road accidents.
- Carry out regular checks to ensure that all vehicles used on company premises comply with national law and company safety standards.

Emergency preparedness and response

- Follow effective plans and procedures to protect life and minimize the risk of injury and property damage from fire, natural disaster, or accidents or other emergencies.
- Inspect, maintain, occupy, and operate facilities and equipment in compliance with applicable regulations and accepted standards for fire protection and safety.
- Ensure that First Aid is available at the worksite and that workers have the means to contact local officials in the event of an emergency.



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CONSERVATION AND SUSTAINABLE LAND USE POLICY	
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CONSERVATION AND SUSTAINABLE LAND USE POLICY

Goodhope will not conduct any new development on High Carbon Stock (HCS) Forest, High Conservation Value (HCV) Areas or peatland of any depth and is working to eliminate deforestation and conversion of other natural ecosystems from its supply chains. Land-use planning for the development of oil palm plantations or associated infrastructure follows the RSPO Procedures for New Plantings (NPP) to determine appropriate areas for development. The company is committed to maintain and protect important values including carbon storage, biodiversity, sources of water, and other resources that are important for sustaining the wellbeing of indigenous peoples and local communities. Best agronomic practices are utilized for soil, waste and pest management and the Group promotes these practices within its supply chain and the broader industry.

Goodhope’s operations, subsidiaries, and suppliers are expected to adhere to the following requirements:

No deforestation and no conversion of natural ecosystems

- Work towards ensuring that the materials produced or purchased do not originate from deforested areas or converted natural ecosystems, including HCV areas, HCS forests, and peatland.
- Comply with the cut-off date of 5th May 2017 for Goodhope’s own operations and 4th May 2019 for its suppliers, after which, management units associated with deforestation or conversion are deemed non-compliant.

Mitigation of social and environmental impacts

- Identify potential social and environmental impacts associated with company operations.
- Implement measures to mitigate social and environmental impacts.

No development in HCS forest or HCV areas

- Identify High Carbon Stock (HCS) forest and High Conservation Values prior to any new developments in a manner that fulfills the applicable requirements of the HCSA, HCVRN, RSPO P&C 2018, and integrated RSPO-endorsed methods.
- Use ALS-licensed assessors to lead HCV and integrated HCV-HCSA assessments.
- Exclude HCV and HCS areas from land development plans for oil palm and palm oil production.



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No development on peat

- Map peat soils prior to new land clearing and prohibit any new development on peatland of any depth (peat is defined according to the country-specific classifications).
- Protect areas of unplanted peatlands in the concession as peatland conservation areas.

Biodiversity conservation

- Encourage the long-term protection of all identified HCVs, HCS forest, and peatland conservation areas while recognizing the rights of local communities.
- Encourage the conservation of natural ecosystems in areas adjacent to the concession and in the wider landscape.
- Take action to protect biodiversity within plantations managed by the company, in set-aside conservation areas (HCV/HCS areas), and in designated areas outside of concession boundaries.
- Take action to protect native animals and plants, especially Rare, Threatened, or Endangered (RTE) species, i.e., those species classified in the IUCN Red List as Vulnerable, Endangered, and Critically Endangered at a global or regional level, or whose trade is regulated under international agreements (e.g. CITES), as well as nationally protected species.

No hunting

- Prohibit the poaching, hunting, capturing, and trafficking of wild animals within concessions.
- Respect the rights of indigenous peoples to engage in traditional and customary forms of sustainable hunting and work with the local communities to ensure there is a designated time, place, and manner for such hunting and that it is legal, noncommercial, and does not threaten ecosystems or harm RTE species.

Zero burning and fire mitigation

- Prohibit open burning across all operations.
- Implement fire prevention and control measures to mitigate the risk of land fires in and in the vicinity of concessions.

Pollution control

- Implement measures to prevent and reduce the release of pollutants or contaminants into the environment to avoid pollution or contamination to air, land and water.



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Responsible application of agrochemicals

- Apply agrochemicals (pesticides and fertilizers) in a sparing and responsible manner to protect crops from pests and to enhance crop yields.
- Optimize the use of inorganic fertilizers and apply organic waste to maintain soil fertility while minimizing the use of chemicals.
- Maximize the natural control of pests and reduce the need for toxic pesticides by integrated pest management.
- Prohibit the use of paraquat and adopt guidelines by the World Health Organization (WHO) for the exclusion of highly hazardous pesticides listed as Class 1A or 1B chemicals, or those subject to the Stockholm or Rotterdam Conventions.

Soil, water, and energy conservation

- Adopt good agricultural practices to minimize soil erosion and nutrient losses and to sustainably manage and protect water resources. This includes the conservation of buffer zones along rivers and water bodies and the maintenance of natural vegetation on steep slopes to prevent erosion and sedimentation.
- Maintain maps of peat soils within concessions and implement water and soil management and monitoring systems to minimize subsidence in any existing areas of cultivated peatland.

Restoration and rehabilitation

- Where it is viable to do so, progressively restore the prior ecological functions and values of degraded areas within concessions.
- Develop and implement a suitable time-bound remediation or compensation program to address any deforestation or conversions within the company’s own operations that do not comply with the Group’s policy of No Deforestation and No Conversion of Natural Ecosystems (the cut-off date for Goodhope’s own operations is 5th May 2017 and for its suppliers is 4th May 2019).

Mitigation of greenhouse gas emissions

- Identify sources of Greenhouse Gas (GHG) emissions and estimate GHG emissions.
- Adopt improved land management practices and other viable approaches for reducing greenhouse gas emissions.



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RESPONSIBLE SOURCING AND SUPPLY CHAIN MANAGEMENT POLICY	
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RESPONSIBLE SOURCING AND SUPPLY CHAIN MANAGEMENT POLICY

No Deforestation, No Peatland, and No Exploitation (NDPE) commitments apply to all suppliers, contractors, and associates with whom we work with. To achieve a fully compliant supply chain, appropriate systems must be in place for responsible sourcing and the effective management of third-party supplier relationships.

This Policy applies to all of the palm-based materials the Group buys, including fresh fruit bunches, crude palm oil, palm kernel, palm kernel oil, and derivatives.

Supplier requirements

Goodhope requires suppliers to demonstrate that the materials they supply are produced in compliance with the Group's Sustainability Policy, including No Deforestation, No Development on Peat, and No Exploitation (NDPE). These expectations are communicated during supplier engagement processes.

Supplier assessment

Fulfillment of the requirements expected by suppliers is assessed annually and as an entry requirement for any new potential supplier. There will be no discrimination in the selection and screening of suppliers.

Supply chain traceability

Goodhope commits to maintaining a transparent and traceable supply chain. The Group will continue to work with third-party suppliers to trace back to plantations all palm-based materials it sources from them.

Evaluation of supply chain risks

Goodhope uses risk assessment tools to assess and manage the risks associated with business engagement with third-party suppliers.

Support for independent smallholders

Goodhope actively supports independent smallholders by sharing best practices, providing educational and technical assistance, and facilitating smallholder inclusion into its supply chain.



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We operate with the understanding that smallholders retain the right to make their own decisions regarding the use of their land, their participation in commodity supply chains, and their interests in balancing livelihood and conservation considerations. We engage with smallholders in a fair, transparent and accountable manner and will form greater partnerships with them in order to effectively implement this policy.

Managing supplier non-compliance

Verified issues of non-compliance are subject to due procedures for grievances involving third parties. The aim is not to exclude suppliers from our supply chain but to encourage suppliers to build compliance with our sourcing commitments through the implementation of time-bound action plans. As a last resort, we will review our business dealings with suppliers who refuse to comply with NDPE commitments or who fail to satisfactorily demonstrate a genuine willingness to work towards meeting agreed milestones.