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Fuji Oil Group Supplier Code of Conduct

Introduction

The mission of Fuji Oil Group is to continue to contribute to the happiness and well-being of people through delicious and healthy foods. We consider this to be our corporate social responsibility. Accordingly, we seek to contribute to society through business activities while encouraging sustainable development of society in cooperation with all our stakeholders.

For us, suppliers are key partners for achieving a sustainable society as represented in the Sustainable Development Goals (SDGs). Through cooperation with our suppliers ("Suppliers"), we aim for the sustainable development and prosperity of "Suppliers", "Fuji Oil Group" and "society".

This Supplier Code of Conduct specifies requirements, which are the basis for continuous engagement and collaboration towards the realization of a sustainable society. Suppliers shall make a best effort to practice the Supplier Code of Conduct in their business operation and supply chain.

All our suppliers delivering raw materials, products and services to the Fuji Oil Group are requested to commit to this Supplier Code of Conduct.

Additionally, suppliers are requested to adhere to all other applicable Fuji Oil Group policies (e.g. Responsible Palm Oil Procurement Policy or Responsible Cocoa Procurement Policy).

Principles

1. Respecting Human Rights

(1) Non Discrimination

Suppliers shall prohibit discrimination of any kind , including but not limited to race, color, sex, religion, political opinion, national origin, social origin, age, disability, illness, participation in trade unions and sexual orientation; in all employment aspects including recruitment, compensation, promotion, disciplinary measures, discharge, etc.

(2) Occupational Safety and Health

- Suppliers shall provide safe and hygienic workplaces for all worker activities. Suppliers shall comply with all applicable laws and regulations regarding occupational safety and health. For prevention of accident and health damage, Suppliers shall establish a Risk Management system, identify hazards of occupational safety and health regularly and take appropriate measures. Suppliers shall provide safety training and make best efforts to engage with employees to promote occupational safety and health.

(3) Labor Standards

- Suppliers shall provide compensation for workers in accordance with all applicable laws and regulations and in a timely manner—including those pertaining to minimum wage, overtime, maximum hours, benefits, premium pay and leave. Suppliers shall prohibit any harassment and violence.

(4) Freedom of Association and Collective Bargaining

- Suppliers shall recognize and respect employee's right to freedom of association and collective bargaining. Suppliers shall secure the rights of employees to join or form a labor union by their self-selection without fear of intimidation or retaliation, in accordance with domestic laws. Suppliers shall make best efforts to keep a constructive dialogue with the labor union.

(5) Forced Labor¹

- Suppliers shall not use any form of forced labor. Suppliers shall secure freedom of movement for all workers. Suppliers shall not charge any fees to workers which are to obtain or maintain employment. Suppliers shall inform all workers of terms and conditions of employment in advance in a way that they can understand. Suppliers shall declare their policy on prohibition of forced labor.

(6) Child Labor²

- Suppliers shall not use child labor. Suppliers shall respect the rights of children for education, safety and health. Suppliers shall not hire children under 18 years

¹ Forced labor means work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. This is based on ILO convention No.29.

² Child labor means work which deprives a child's opportunity to be educated, harm the child's growth, or is done prematurely. Please refer to ILO conventions No.138 and 182 for further details.

old for positions including hazardous work and night shifts. Suppliers shall not employ children under 15 years old, or under the age of completing compulsory education, or under the minimum age of employment in the country. Suppliers shall prevent children from working longer than permitted by domestic laws for light and regular work. Suppliers shall declare their policy on eliminating child labor. Furthermore, Suppliers shall identify risks and take preventive measures to ensure that business activities do not assist or participate in child labor.

(7) Local Community

- Suppliers shall aim at coexistence and mutual prosperity, and endeavor to keep a good relationship with local communities based on communication. Suppliers shall respect land rights of indigenous and local communities. When Suppliers seek to operate their business in lands where indigenous and local communities hold legal, communal or customary rights, Suppliers shall recognize and respect the rights of indigenous and local communities to be given their Free, Prior and Informed Consent (FPIC).

2. Assurance of Product Quality and Safety

(1) Assurance of Product Quality and Safety

- Suppliers shall provide raw materials, products, services and information under a stable supply system with Fuji Oil Group.
Suppliers shall ensure a quality and food safety management system for the safety and quality of their raw materials, products and services. Suppliers shall guarantee compliance with required specifications (standards) and appointed dates of delivery which are required from Fuji Oil Group and comply with all applicable laws regarding food safety and quality including trace components, such as agricultural chemicals and heavy metals, and microbes.

3. Environmental Protection

(1) Environmental Impact

- Suppliers shall actively promote the preservation and sustainable use of environmental resources such as air, water, forests and biodiversity, etc. Suppliers are requested the following efforts;
 - To establish and operate environmental management systems
 - To identify the impact on the environment, to take measures to mitigate the identified negative impact, and monitoring of their progress

- Suppliers shall recognize the finiteness of water resources and make best efforts to identify and to reduce negative impact of water use on the environment and the local community. Suppliers shall manage quality, source, and quantity of water supply and drainage to reduce water consumption and to prevent water pollution.
- Suppliers shall comply with applicable laws and regulations on environment and manage chemical substances appropriately, in accordance with safety data sheets which are based on the criteria of GHS³, for example.

(2) Efforts towards Low Carbon

- Suppliers shall take measures continuously to reduce the greenhouse gas emissions. Suppliers shall calculate GHG (Green House Gas) emissions for the entire business and communicate with us about GHG emissions if requested.
- Suppliers shall actively promote the use of renewable energy and actively promote the efficient uses of energy (energy saving). Suppliers shall actively promote activities which contribute to zero deforestation.

4. Business Integrity and Fairness

(1) Compliance with Laws and Regulations

- Suppliers shall comply with all applicable laws, including but not limited to bribery, corruption, antitrust, competition and export control. Suppliers shall not be engaged in activities that limit free competition in the market place, or in the provision and receipt of improper profits.

(2) Information Security and Privacy

- Suppliers shall establish a management system to appropriately protect personal and confidential information and prevent information leakage.

5. Risk Management

(1) Risk Management and BCP

- Suppliers shall establish risk management systems and make best efforts to mitigate and avoid risks. In the event of an unexpected crisis such as a large-scale disaster or pandemic, Suppliers shall promptly take measures to

³ GHS (Globally Harmonized System of Classification and Labelling of Chemicals) addresses classification of chemicals by types of hazard and proposes harmonized hazard communication elements, including labels and safety data sheets, and provide it as a global standard.

ensure raw materials, products and service supply continuity. Suppliers shall formulate a BCP (Business Continuity Plan) in the event of a crisis. As part of the risk management, Suppliers shall assess the impact of climate change on their businesses, assess the water related risk in the watershed of their business sites that use water for production, etc., and take appropriate measures for business continuity.

6. Remediation

(1) Remediation Mechanisms

- Suppliers shall provide a fair and transparent remediation mechanisms to receive concerns from employees and other stakeholders about negative impacts. The remediation mechanism includes but is not limited to whistle-blower systems and grievance mechanisms. Suppliers shall make best efforts to inform the affected stakeholders on how to access the mechanism. In the handling of complaints, suppliers shall prohibit retaliation against the claimant and make best efforts to keep a constructive dialogue with the stakeholders using the remediation mechanism.

Practice and Communication on the Supplier Code of Conduct

- Suppliers shall ensure an internal management system to comply with the principles of Fuji Oil's Supplier Code of Conduct. The management system includes appointing a person in charge and providing appropriate training and education.
- Where there is a conflict between domestic laws/regulations and the Supplier Code of Conduct, Suppliers shall make best efforts to seek ways to respect the Supplier Code of Conduct to the maximum extent possible while respecting domestic laws.
- Suppliers shall deal with business operators who support the principles Supplier Code of Conduct and make efforts to implement it, in order to promote the content of the Supplier Code of Conduct throughout the supply chain. Suppliers shall share and communicate this Supplier Code of Conduct or equivalent documents with business operators who are in further upstream in the supply chain.
- Suppliers shall cooperate with Fuji Oil Group for investigation and improvement, in a timely manner, in case that any eventuality could affect the business relationship with Fuji Oil Group regarding matters related to the principles of the

Supplier Code of Conduct.

Fuji Oil Group requests interactive and continuous dialogue with Suppliers about the compliance and progress of the items covered by the principles of the Supplier Code of Conduct. Suppliers shall make best efforts to communicate transparently with Fuji Oil Group upon request therefrom. Suppliers shall contact Fuji Oil Group about the Supplier Code of Conduct if they have any questions and/or comments thereon.

President and CEO

Mikio Sakai

Reference

References of the Supplier Code of Conduct are below;

- International Bill of Human Rights
The Universal Declaration of Human Rights
<https://www.un.org/en/universal-declaration-human-rights/index.html>
Two International Human Rights Covenants
<https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>
- UN Guiding Principles on Business and Human Rights
https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- ILO Declaration and Conventions
 - ILO Declaration on Fundamental Principles and Rights at Work
<https://www.ilo.org/declaration/lang--en/index.htm>
 - Convention No.29 (Forced Labour Convention)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029
 - Convention No.138 (Minimum Age Convention)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312283:NO
 - Convention No.182 (Worst Forms of Child Labour Convention)
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312327:NO
- ILO&IOE Child labour tool for business
https://www.ilo.org/ipec/Informationresources/WCMS_IPEC_PUB_27555/lang--en/index.htm
- UN Declaration of the Rights of Indigenous Peoples
https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf
- OECD Guidelines for Multinational Enterprise
<http://mneguidelines.oecd.org/guidelines/>
- 10 Principles of the UN Global Compact
<https://www.unglobalcompact.org/what-is-gc/mission/principles>
- GRI (Global Reporting Initiative) Standards
<https://www.globalreporting.org/standards>

- Engagement and Remedy Guidelines
<https://www.bhrlawyers.org/en-erguidelines>
- Globally Harmonized System of Classification and Labelling of Chemicals
http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html
- Paris Agreement
<https://www.mofa.go.jp/mofaj/files/000197313.pdf>
- Convention on Biological Diversity
<https://www.cbd.int/convention/>