Darta Supplier Code of Conduct

Darta NV and all of its subsidiaries *(Darta Alentejo, Darta UK, Darta Yorkshire, Darta Italia, Covalpa, Sole di Sicilia and Talfrost)*, hereinafter referred to as 'Darta' or 'the Darta Group', attaches great importance to ethical, social and environmental responsibility in every supplier relationship.

This Supplier Code of Conduct ('Code') defines the minimum standards that Darta expects from all suppliers of goods and services, including their employees, agents, subcontractors, labour providers and upstream suppliers ('Suppliers'). This Code applies to all Suppliers involved in Darta's supply chain, regardless of location or activity. Compliance with this Code is a prerequisite for establishing and maintaining a business relationship with Darta.

We require our suppliers to comply with:

- all applicable local, national and international laws and regulations; and
- the principles and requirements set out in this Code.

Where local laws and this Code differ, Suppliers shall apply the higher standard where legally permissible, particularly with respect to human rights, labour conditions, health & safety and environmental protection.

Suppliers are responsible for ensuring that the principles of this Code are applied throughout their own supply chains. The Supplier is required to ensure compliance with the most updated version of the Supplier Code of conduct, which can be found on our website.

The principles below represent minimum standards for business practices and relationships and are based on the following international guidelines and principles:

- The Universal Declaration of Human Rights
- The UN Global Compact and UN Sustainable Development Goals (SDG's)
- The UN Guiding Principles on Business and Human Rights
- The UN Convention on the Rights of the Child
- The UN Convention on the Elimination of All Forms of Discrimination against Women
- OECD Guidelines for Multinational Enterprises
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Code of Conduct on responsible food business and marketing practices
- The basic Code of Ethical Trading Initiative (ETI) (www.ethicaltrade.org).

Darta reserves the right to perform an integrity check on its suppliers, as part of its selection process; with announced or unannounced audits or involving external auditing partners (e.g. Sedex-SMETA). Suppliers are required to declare any potential conflict of interest prior to the start of the selection process.

1. Commitment to Legal & Regulatory Compliance

We require our suppliers to fully comply with all applicable laws and regulations in the countries in which they operate and in which Darta Group operates, including but not limited to labour, employment, health & safety, environmental, trade and tax legislation.

Anti-Bribery/Anti-corruption

We expect suppliers to be in full compliance with all applicable foreign and domestic anti-corruption laws.

In practice, this requires suppliers to stay informed about applicable regulations, implement necessary policies, and ensure continuous compliance across their operations.

Conflicts of Interest

Suppliers should avoid even the appearance of conflicts of interest in their cooperation with Darta.
In practice, this requires suppliers to disclose any real or perceived conflicts and manage them transparently.

Gifts and Entertainment

Suppliers may not offer or accept anything of value from business partners to obtain unfair business advantages.
In practice, this requires suppliers to ensure that any hospitality or courtesy remains modest and aligned with applicable laws.

Security and Personal Data

Suppliers must ensure that they safeguard the security of their systems with data storage and ensure they comply with the highest industry standards.
In practice, this requires suppliers to comply with data protection laws and implement appropriate technical and organizational safeguards.

Fair Competition and Antitrust

We require our suppliers to conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations.
In practice, this requires suppliers to act independently in pricing, bidding, and market practices and refrain from any form of collusion.

Trade sanctions

We require our suppliers to comply with international trade sanction programmes and regulations.
In practice, this requires suppliers to conducting due diligence to ensure that transactions and partnerships do not violate international restrictions.

Money laundering

All suppliers are expected to comply with applicable laws and regulations aiming to prevent unlawful or illicit financial transactions.
In practice, this requires suppliers to implement internal controls to detect and avoid involvement in unlawful or illicit financial activities.

Disclosure of Information

We expect suppliers to accurately record and disclose information regarding their business activities, without falsification or misrepresentation.
In practice, this requires suppliers to ensure that information provided to Darta or relevant authorities is accurate, complete, and timely.

Confidentiality/Privacy

Suppliers may not disclose such information unless given prior written permission by Darta.
In practice, this requires suppliers to not share, disclose or use any such information without proper authorisation.

Lobbying

Suppliers must always be familiar and comply with all laws and regulations as they relate to lobbying.
In practice, this requires suppliers not to represent Darta or acts on its behalf unless expressly authorized to do so.

Intellectual Property

Suppliers must respect Darta's intellectual property rights.
In practice, this requires suppliers to not to share, disclose or use any such information without proper authorisation.

Accuracy of business records

We are committed to the integrity of our business records and ensuring that our books, records, and financial reporting are accurate and complete.
In practice, this requires suppliers to guarantee that financial books and records reflect true transactions and are available for review when required.

Workplace Standards

Suppliers must commit to establish and ensure a safe working environment for all employees.
In practice, this requires suppliers to follow all general workplace standards and compliance with all applicable laws and regulations, including those that relate to labour, wages, working hours, discriminatory hiring and employment practices, and health and safety.

Accounting, documentation and reporting

Our suppliers shall comply with accepted accounting rules, controls, and disclosures at all times and ensure that the audits are provided with accurate information.
In practice, this requires suppliers honestly and accurately record and report all business information and comply with all applicable laws regarding completion, accuracy, retention, and disposal.

2. Commitment to human rights & mutual respect

Darta is proud to employ individuals from diverse backgrounds, cultures, and age groups. In line with this commitment to inclusion and fairness, we expect our suppliers to fully comply with applicable local laws as well as internationally recognized principles and standards established by the United Nations concerning Human Rights and Decent Work. It is essential that all suppliers actively ensure their operations and supply chains are free from any form of human rights violations.

This means that we require our suppliers to observe and in turn apply these principles in their own supply chain, as follows:

Darta believes that everyone should be treated with dignity, fairness and respect. We undertake to support the protection and preservation of human rights throughout our operations. Therefore, suppliers must always maintain a work environment free of discrimination, harassment or violence.

This means that suppliers must always:

- avoid engaging in activities that encourage human rights abuses, modern slavery, human trafficking, child labour, bonded labour or forced labour, regardless of local legislation and customs
- allow their employees the choice to leave their employment freely upon reasonable notice

- provide their employees with training to help them recognize situations where a risk of modern slavery exists
- ensure that their supply chain is free from any form of modern slavery by requiring that their own suppliers do the same

Prohibition of child labour and forced labour

All forms of child labour and forced labour are to be abolished. Local legislation is the main reference point regarding minimum working age. If no legislation exists, the applicable ILO Convention has to be followed.

What does it mean for suppliers ? Suppliers are expected to ensure that no one below the legal working age is employed and that no employee is subjected to coercion or forced labour under any circumstance.

No inhumane treatment

Suppliers are expected to ensure that their employees are not subject to any situation of inhumane treatment or threat, including harassment or sexual abuse, physical punishment, physical or moral coercion or verbal abuse.

What does it mean for suppliers ? All work environments must be respectful and free from violence, harassment or any form of degrading treatment.

No discrimination

We believe that diversity makes our teams richer. In that spirit, our suppliers have to ensure that no discrimination exists on the grounds of race, color, gender, language, religion, political opinions, nationality, social background and status, union membership, age, health status or disability.

What does it mean for suppliers ? Hiring and employment decisions must be based solely on skills and qualifications, not on personal characteristics or beliefs.

Appropriate wage and working hours

Suppliers are expected to observe rules on minimum wages and their employees receive salaries, allowances and other benefits, as defined in national legislation and in International Conventions.

This means that wages must meet or exceed the legal minimum and working hours should respect national regulations and not exceed legal limits.

Freedom of association and right to collective bargaining

Suppliers have to guarantee the rights of their own employees to freely uphold trade union associations and engage in formal collective bargaining.

What does it mean for suppliers ? Employees should not face any form of retaliation or discrimination for participating in union activities.

No illegal employment

Suppliers must ensure that employees are employed or hired according to local legislation.

This means that all workers must have legal right to work, and proper documentation must be maintained.

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Ethical Recruitment and Responsible Management of Labour Providers

Darta requires all suppliers, subcontractors, and labour providers to ensure that all workers are recruited legally, voluntarily, and ethically.
Where third-party employment agencies or subcontractors are used, suppliers must conduct appropriate due diligence to verify that these entities comply with all applicable laws and ethical recruitment practices.

Suppliers shall :
- Use only legally licensed or duly registered labour providers and maintain up-to-date documentation of such licenses.
- Ensure that no recruitment fees, deposits, or other costs are charged to workers, directly or indirectly. Where any recruitment fees or related costs are identified, suppliers must implement a documented reimbursement process, ensuring full repayment to affected workers in a timely manner.
- Workers receive a written employment contract prior to departure or commencement of employment, clearly stating wages, working hours, job role, location, benefits and conditions.
- Employment contracts and key employment information are provided in a language that the worker understands.
- Original identity documents (including passports, ID cards or work permits) are never retained, withheld or confiscated. Voluntary safekeeping is permitted only with written consent and unrestricted access for the worker at all times.
- Verify and document that all workers, including those employed through third parties, have the legal right to work and are employed under fair and lawful conditions.
- Maintain documentary evidence of due diligence checks, including business licenses, recruitment licenses, written contracts, and proof of legal employment status.
- Extend the principles of this Supplier Code of Conduct to all subcontractors and labour providers engaged in the performance of work for Darta.
- Workers are free to terminate their employment in accordance with applicable law without penalty, intimidation or financial consequence.
- Cooperate fully with Darta in providing documentation or access for verification or audit purposes.

Darta reserves the right to request, review, or audit documentation from suppliers and their labour providers at any time to verify compliance with these requirements.
Non-compliance with these obligations may result in suspension or termination of the business relationship.

Compensation and working hours

We expect all our suppliers to pay employees at least the national minimum wage in line with local/national laws. In any event, employees should not be asked to work excessive hours.

This means that overtime should be voluntary and compensated in accordance with the law.

Respectful Communication

Suppliers shall ensure that their employees, contractors and representatives communicate in a respectful and professional manner at all times when interacting with Darta and its employees.
Any form of disparaging, disrespectful of inappropriate remarks about the company, its activities or its employees is not acceptable.

3. Commitment to the Environment

Furthermore, Darta expects its suppliers to take proactive steps to minimize their environmental impact and to embed sustainability into their everyday operations. To support transparency and continuous improvement, suppliers will be subject to regular monitoring and progress reviews based on defined environmental indicators, conducted by Darta.

Where appropriate, and depending on the industry and geographical context, Darta may carry out joint assessments or audits with suppliers, focusing on key environmental areas such as reducing greenhouse gas emissions, improving energy efficiency, setting water conservation targets, minimizing waste, increasing recycling efforts, preserving biodiversity, controlling emissions, and integrating renewable energy sources.

Suppliers are required to actively contribute to sustainability goals and ensure full compliance with all relevant national environmental regulations related to the production, manufacturing processes, and end-of-life handling of their products. Darta will collaborate with strategic suppliers to identify and implement opportunities for enhancing environmental performance throughout the supply chain. In turn, suppliers are expected to maintain and enforce a sustainable procurement policy that also applies to their own subcontractors and partners.

Carbon footprint & energy use

Suppliers are expected to actively contribute to the reduction of carbon dioxide and other greenhouse gas emissions from their activities in order to combat climate change and the adverse effects on our environment.
This means identifying and implementing measures to monitor and reduce emissions and switching to low-emission energy sources where possible.

Use of Water & Natural Resources

Suppliers are expected to use natural resources and water in a responsible way in their operations.
This means minimizing consumption, avoiding waste, and preserving resources through efficient processes and recycling.

Waste Reduction, Reuse and Recycling

Suppliers are expected to reduce waste, reuse and recycle materials in their commitment to sustainability and responsible resource management and ensure that no raw materials in the supply chains have been produced on land that was converted or deforested after December 31st 2020;
This means setting targets to limit landfill use, and developing practices that support the circular economy.

Environment

Suppliers are expected to prevent, manage and limit other environmental impacts from their activities. Suppliers shall demonstrate responsibility towards the communities in which they operate, and manage community impact resulting from company and factory operations.
Suppliers will also ensure that primary and secondary packaging (including labels) containing cellulose consists of recycled material or FSC-certified virgin fiber. In exceptional cases, PEFC-certified cellulose may also be used. By 2026 maximum recyclability must be achieved for 100% of packaging.
This means addressing issues such as emissions, soil contamination, noise pollution, and safe handling of hazardous substances and maintain biodiversity, protect wildlife and endangered species.

Compliance & Reporting

Suppliers must obtain and maintain compliance with all applicable environmental requirements.
This means having up-to-date permits, keeping accurate records, and reporting environmental performance transparently when requested.

4. Commitment to Health & Safety and Quality

Darta prioritizes the health and safety of workers, communities, and stakeholders; we also expect our suppliers to implement robust safety measures, provide proper training, and ensure compliance with industry, health and safety standards.

Safety laws

Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they and Darta operate.
This means that suppliers are expected to provide employees with a healthy and safe workplace, including access to clean, safe and reasonable working condition.

Occupational safety

Suppliers must protect workers from exposure to chemical, biological, and physical hazards, in addition to on-site accidents.
This means that suppliers are expected to identify, evaluate and manage these occupational health and safety hazards and take necessary security measures to prevent these incidents and accidents from happening.

Emergency prevention

Suppliers must identify and assess potential emergency situations in the workplace.
This means that suppliers must develop and implement emergency plans and response procedures, including but not limited to fire alarms, fire drills, emergency exits, fire detection and suppression equipment, and recovery plans to minimize harm to life and property. Suppliers must regularly test emergency preventative methods, such as fire alarms, to ensure that they are in working order.

Incident management

Suppliers must create and maintain procedures to prevent, manage, track, and report employee safety incidents.
This means that suppliers are expected to implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate employees' return to work.

Product Quality and Safety

Suppliers are responsible for delivering products and services that meet agreed-upon quality and food safety standards. This includes:

- compliance with Darta's general requirements and applicable food, product, and consumer safety legislation
- implementation of quality control and traceability systems throughout the supply chain
- minimize pesticide residues in food products supplied to Darta
- adherence to HACCP principles (or equivalent risk-based food safety systems, where applicable)
- prompt communication to Darta and corrective actions in the case of safety incidents, recalls, or deviations from the specifications.

5. Upholding this Supplier Code of Conduct

Communication and training

Communication and training are essential components of Darta's ethical framework. Darta aims to foster a culture of compliance and ethical behaviour, both internally and throughout its supply chain.

This Supplier Code of Conduct will be made available to all suppliers and communicated in a phased approach. Suppliers are responsible for ensuring that this Code is communicated to their employees, subcontractors and business partners involved in providing goods or services to Darta.

Suppliers and their employees shall comply with the principles and requirements of this Code to ensure alignment with Darta's ethical standards.

Monitoring and compliance

Darta is committed to monitoring supplier compliance with this Supplier Code of Conduct. To support this commitment, Darta may use a structured monitoring approach, which can include self-assessment questionnaires, periodic audits, and independent assessments or surveys.

Suppliers shall maintain transparent, accurate, and up-to-date records demonstrating compliance with this Code; provide supporting documentation or access for verification upon request by Darta.

Suppliers are expected to implement appropriate management systems to ensure ongoing compliance including :
- clear assignment of responsibilities for social, labour, health & safety and ethical compliance;
- periodic risk assessments, including risks related to forced labour and recruitment practices;
- training for relevant personnel, including management and recruiters;
- tracking, implementation and follow-up of corrective actions.

In cases of significant or repeated non-compliance, Darta reserves the right to take appropriate measures, which may include corrective action plans, additional compliance requirements, suspension or, in severe cases, termination of the business relationship.

Through this approach, Darta seeks to promote continuous improvement, shared accountability and responsible business conduct throughout its supply chain.

Worker Grievance Mechanism

Suppliers shall establish and maintain an accessible, confidential and effective grievance mechanism for all workers, including agency, temporary and migrant workers.

The grievance mechanism shall :
- allow workers to raise concerns related to working conditions, wages, working hours, health & safety, discrimination, harassment or recruitment practices.
- be clearly communicated to workers in a language they understand.
- ensure confidentiality and protection against retaliation
- enable timely investigation and appropriate remediation of grievances.

Whistleblowing

Darta is committed to protecting its integrity and encourages the reporting of suspected misconduct or breaches of applicable laws. In accordance with the EU Whistleblower Protection Act, suppliers may report, in a professional context, potential breaches relating to:

- Product safety and conformity
- Transport safety
- Environmental protection
- Public health
- Consumer protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and animal welfare
- Privacy and the protection of personal data
- Security of network and information systems
- Social fraud and tax evasion.

Reports may be submitted through the following channels:
- email: *integrity@darta.com*
- Anonymous reporting: https://whistleblower.darta.com.

All reports made in good faith will be treated confidentially and investigated in a fair and appropriate manner. Reports made in good faith will not result in disciplinary action or dismissal.

Any form of intimidation or retaliation against individuals who raise concerns is strictly prohibited. Violations of this Code or applicable laws may result in disciplinary action, termination of contractual relationships, legal proceedings and/or contractual remedies. Protection against retaliation applies to all workers raising concerns in good faith, including grievances related to labour conditions, health & safety, recruitment practices or management behaviour.

Acceptance and Enforcement

Darta has communicated its Code of Conduct to its personnel at all organizational levels and will make reasonable efforts to ensure that its requirements are respected by suppliers involved in the production process.

Acceptance of this Supplier Code of Conduct is a condition for establishing and maintaining a business relationship with Darta. By doing business with Darta Group, suppliers acknowledge this Code and commit to making all reasonable efforts to comply with its requirements throughout the duration of the business relationship.

This Code has been approved by the Board of Directors of Darta Group.

Name Company :

By (name and function) :

Signature and Date :