

# SUPPLIER CODE OF CONDUCT

Twin Rivers Technologies strives to conduct business with honesty and with the highest level of integrity. We believe these are cornerstones to long-term successful business relationships between us and our supplier and customers. The following Supplier Codes of Conduct is fundamental to our past and future success as a leader in the Oleochemical and any other business endeavors we choose to pursue. It is of the utmost importance to Twin Rivers that we deal with suppliers that are likewise working in a manner consistent with this Supplier Code of Conduct.

## **1. BUSINESS ETHICS & INTEGRITY**

- 1.1. **Business Stability:** Suppliers' financial health is crucial to FGV Holdings Berhad and its group of companies, including Twin Rivers Technologies Manufacturing Corp "Twin Rivers Technologies", "TRT"). In certain situations, TRT may request financial information to ensure key suppliers are financially viable and able to support our business. Twin Rivers Technologies may also request for information regarding a Supplier's parent company. A Supplier is expected to be responsible for notifying Twin Rivers Technologies promptly of a change in ownership that may have a material affect on the supplier's ability to support TRT.
- 1.2. **Prohibition of Bribery & Corruption:** A bribe is any gratification, monetary or otherwise, and includes any privilege, special benefit, gift or other item of value or any kind of special or favoured treatment, that is improperly offered, promised or given for the purpose of obtaining, retaining or directing any business dealings, or other advantage in the conduct of business. Suppliers shall comply with all applicable anti-bribery and corruption laws in which your company operates. Twin Rivers Technologies exercises an External Gift, Entertainment and Hospitality Policy to ensure high standards of propriety in the conduct of its business.
- 1.3. **Anti-Money Laundering:** The term money laundering is the process of hiding the true nature or source of illegally obtained funds and passing it through any legitimate business channels from one place or person to another. Anti-money laundering provisions are designed to help prevent legitimate businesses from being used by criminals and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding. Twin Rivers Technologies prohibits any involvement in money laundering activities either directly or indirectly. Suppliers are required to report any suspicious transactions or any money laundering concerns to Twin Rivers Technologies.



- 1.4. **Anti-Trust & Competition Laws:** Suppliers shall comply with all applicable antitrust and competition laws of the country in which Twin Rivers Technologies operates. Suppliers shall not use illegal or unethical methods to compete in the market which includes but are not limited to:
- 1.4.1. Exchanging, agreeing or arrangement to exchange commercially sensitive or competitive information with competitors
  - 1.4.2. Fixing prices or terms related to pricing
  - 1.4.3. Dividing up markets, territories or customer
  - 1.4.4. Adopting strategies to illegally exclude competitors from the market.
  - 1.4.5. Illegal Monopolies
- 1.5. **Safeguarding Resources:** Suppliers are expected to safeguard Twin Rivers Technologies resources which include property, assets, intellectual property, company technology, trade secrets and other confidential, proprietary or sensitive information while performing work for Twin Rivers Technologies. The use of Twin Rivers Technologies resources without proper approval or for anything other than performing work for Twin Rivers Technologies is strictly prohibited.
- 1.6. **Disclosure of Information:** Suppliers shall not use any of Twin Rivers Technologies information for any personal gain and should never share the information without prior written approval from Twin Rivers Technologies, which approval is at Twin Rivers Technologies sole discretion. Suppliers are not allowed to reproduce copyrighted software, documentation or other materials and are not allowed to transfer, publish, use or disclose it other than in the ordinary course of business or as directed or authorized by Twin Rivers Technologies. Suppliers should observe applicable data privacy standards.
- 1.7. **Financial Integrity:** Suppliers shall not have any false or inaccurate entries in the accounting books or records related to Twin Rivers Technologies for any reason. Suppliers are also expected to ensure all business records and documents are prepared accurately, reliably and in a timely manner.
- 1.8. **Conflict of Interest: Our employees are instructed to avoid personal opinion or conflicts that may interfere with sound business judgement.** Suppliers are expected to prevent or immediately disclose any conflict of interest or potential conflict of interest. The term conflict of interest describes any circumstances that may potentially or actually cause the supplier to lose total objectivity when conducting business with TRT.

## 2. SAFETY, HEALTH & ENVIRONMENT



- 2.1. **Communication:** Suppliers must ensure that workers are aware, through any effective form of communication, of the suppliers' obligations with regards to site safety and workers' obligations of ensuring their own safety.
- 2.2. **Facilities:** Suppliers shall provide workers with minimum and reasonable access to potable water and sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, occupational injury and illness prevention and machine safeguarding, where applicable. Suppliers shall provide a safe and healthy workplace setting and where applicable, provide workers with appropriate personal protective equipment (PPE), to prevent accidents and injury to health, arising out of, linked with, or occurring in the course of, work or as a result of the operation of facilities.
- 2.3. **Alcohol & Drug Abuse:** Suppliers should have in place a policy regarding alcohol and other drug abuse, and is communicated appropriately to workers.
- 2.4. **Environment:** Suppliers shall adopt responsible measures to mitigate negative impacts of their operations on the environment and where applicable, have in place an effective system for managing environmental issues including measuring and reporting on their environmental impact. Suppliers shall, where applicable, adhere to or exceed Twin Rivers Technologies Environmental Policy and Standards.

### 3. LABOR STANDARDS

- 3.1. **Compliance with Labor Laws and Prohibition of Forced Labor:** Suppliers must be committed to and have respect for the protection and preservation of human rights. While it is the responsibility of each Supplier to define its own policy and approach to the issue of human rights, Suppliers' values and business principles must comply with applicable international and local legal requirements in their countries of operation.

Suppliers will not use forced labor which consists of any work or service, not voluntarily performed, that is exacted from an individual under threat of force or penalty, and includes any kind of involuntary or compulsory labor. Suppliers shall not use coerced, bonded or indentured labor, prison labor, or other forms of forced labor.



- 3.2. **Child Labor:** Suppliers shall not use child labor. Suppliers are required to comply with applicable child labor laws and employ only workers who meet the applicable minimum legal age requirement in their countries of operation.
- 3.3. **Compensation and Working Hours & Conditions:** Suppliers are required to comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours in their countries of operation. Suppliers must ensure that their facilities meet appropriate safety standards.
- 3.4. **Discrimination:** Suppliers are required to provide an inclusive and non-discriminatory working environment in which all their employees are valued and treated fairly. Discrimination, retaliation or attempted retaliation on the basis of race, color, gender, age, national origin, religion, sexual orientation, gender identity and expression, marital status, citizenship, disability, veteran status, medical condition, or any other legally protected factor is prohibited. Unlawful discrimination or harassment in the workplace is not tolerated. Suppliers are required to comply with all applicable laws concerning discrimination in hiring and employment practice.

#### 4. COMMUNICATION & DOCUMENTATION

- 4.1. **Communication:** Suppliers are responsible for communicating the requirements of the code to their workers, sub-contractors and/or any service providers where language translations are made when necessary. This SCOC has been drawn up in the English language. In case of discrepancies between the English text version of this Agreement and any translation, the English version shall prevail.
- 4.2. **Documentation:** Suppliers are responsible for maintaining records to demonstrate compliance to the code and related laws.
- 4.3. **Inspection:** In keeping with the standards and expectations outlined in this Code of Conduct, Suppliers may be asked to permit inspections of their sites and facilities for verification purposes. Suppliers shall provide all relevant records to Twin Rivers Technologies upon request. Twin Rivers Technologies reserves the right to audit suppliers on a random basis.



## 5. SUSTAINABILITY

5.1. **FGV's Group Sustainability Policy:** Suppliers of imported oils and products are expected to adopt responsible practices and at a minimum adhere to FGV's Group Sustainability Policy and its no deforestation, no peat and no exploitation (NDPE) commitments. Suppliers are required to meet and comply with all applicable laws, rules and regulations in which they operate. In this regard, Suppliers are expected to develop, implement and maintain effective policies to meet these requirements. Twin Rivers Technologies is committed to support Suppliers in this regard. Our commitments to environmental sustainability are addressed in our and FGV's Sustainability Program, detailed on our web sites at:

- <https://www.twinriverstechnologies.com/sustainability>
- <https://www.fgvholdings.com/sustainability/policies-guidelines/>

5.2. **Adherence to Sustainability Certifications:** Direct Material Suppliers are required to appraise themselves in accordance with sustainability certification schemes, of which Twin Rivers Technologies is a member of the Roundtable on Sustainable Palm Oil (RSPO), and are expected to comply with the principles and criteria therein. Twin Rivers Technologies is committed to supporting Suppliers towards achieving compliance.

6. **REPORTING OBLIGATION:** Any non-compliance with and/or breach of the SCOC could prevent Twin Rivers Technologies from achieving its overall corporate vision, mission and objectives. It could also result in damage to Twin Rivers Technologies reputation and brand. Moving forward with genuine concerns to report, in good faith, any non-compliance or breach of the Code can improve Twin Rivers Technologies worth and value. It is your obligation to report any instance of actual or suspected violation of the SCOC promptly to the FGV Whistleblowing Channel by phone at 1(855)503-0531, or at [alert@fgvholdings.com](mailto:alert@fgvholdings.com) or <http://www.fgvholdings.com/our-company/whistleblowing/>. All reports are taken seriously and will be handled in a confidential manner with disclosure limited to conduct a full investigation of the alleged violation.

## 7. Acknowledgement

- I hereby declare that I have read, understood and agreed to comply with the above Supplier Code of Conduct (SCOC) Handbook.
- I agree to provide relevant documentation supporting our compliance to this SCOC upon request by the Group.
- When required, I shall agree to authorize Twin Rivers Technologies or any party appointed by Twin Rivers Technologies to conduct audits to verify compliance to this SCOC, subject to maintain the findings with both parties.



- I fully understand that the Management has the absolute right to add, amend, review or delete any of the contents of the Code as and when necessary and that I shall also be liable to such additions, amendments, revisions and/or deletions.
- Additional information on TRT’s products and philosophies can be found at: [www.twinriverstechnologies.com](http://www.twinriverstechnologies.com)

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Company Name

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Acknowledged by (print name)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date:

Yours Sincerely,

Alan M. Thompson

Scott Chatlin

Director, Purchasing and Supply Chain Operations    President and CEO

Rev.	Date	Changes	Changed By	Approved By
001		Initial Release		Alan Thompson
002		Updated web links	Alan Thompson	Alan Thompson
003	4/2024	Spelling/Grammer Corrections	Heather Bonasera	Alan Thompson