

Name of the Guideline or Policy/ Location of Application/Company/Department	Guideline or Policy No: /Revision No:	Effective Date	Publication
Responsible Sourcing Policy/Global	010.24/02	May 1, 2026	yes ☒ no ☐

SAF-HOLLAND Responsible Sourcing Policy

I. Purpose

These expectations provide practical guidance to help suppliers meet SAF-HOLLAND's requirements for responsible sourcing, fair working conditions, human rights, and environmental stewardship. This document serves as a supporting guideline to the Supplier Code of Conduct (CoC), which remains the primary binding document suppliers commit to.

II. Scope & Applicability

These expectations apply to all suppliers, contractors, agents and business partners providing goods or services to SAF-HOLLAND. Suppliers are encouraged to communicate these expectations throughout their upstream supply chain.

III. Standards & References

Suppliers are encouraged to align their practices with:

- UN Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- ILO Core Conventions
- OECD Guidelines for Multinational Enterprises
- UN Global Compact
- Applicable national legislation (including environmental, labor, trade and compliance laws)

These support alignment with LkSG, CSRD, CSDDD, the EU Deforestation Regulation (EUDR), the Carbon Border Adjustment Mechanism (CBAM), and relevant OECD and international due-diligence frameworks.

IV. Expectations for Suppliers – Human Rights & Labor

- Freely chosen employment: Employment should be voluntary, without forced, bonded, trafficked or prison labor.
- Child protection: Prohibit child labor, verify minimum age, and ensure safe conditions for young workers in accordance with ILO guidelines.
- Fair and respectful treatment: Protect workers from harassment, discrimination or abusive practices. Recruitment, promotion and dismissal should be based on skills and qualifications.
- Freedom of association: Workers should be free to form or join organizations of their choosing in line with local law and ILO standards.
- Health & safety: Apply reasonable safety measures, provide PPE, training and maintain a safe working environment.

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- Working conditions: Follow legal and industry norms for working hours, rest periods and wages. Overtime should be voluntary and compensated.
- Support for vulnerable workers: Additional protections for migrants, agency, temporary, subcontracted and young workers.

V. Responsible Sourcing & Environmental Due Diligence

- Suppliers are encouraged to establish a due-diligence process aligned with the CoC and global standards:
- Risk-based due diligence: Identify, assess and manage human-rights, environmental and ethical risks in your operations and supply chain.
- Critical and conflict minerals: Maintain traceability for 3TG and other minerals using CMRT/EMRT or relevant tools and follow OECD mineral-supply-chain guidance.
- Deforestation-free sourcing (EUDR, if applicable): For materials such as wood or rubber, maintain traceability and provide documentation supporting EUDR compliance, where relevant.
- Pollution prevention: Reduce emissions to air, water and soil. Implement controls for hazardous substances, wastewater, waste disposal and noise pollution. Monitor and treat wastewater appropriately and avoid contamination of water sources.
- Management of hazardous materials: Handle chemicals and hazardous substances safely, following applicable regulations and international conventions (REACH, RoHS, Minamata, Stockholm, Basel), and ensure appropriate management of PFAS and other substances of very high concern.
- Energy efficiency: Monitor energy use and work toward improved energy efficiency and increased use of renewable energy.
- Biodiversity: Avoid harm to ecosystems and respect land and resource rights.
- CBAM compliance (if applicable): For any materials or products supplied into the EU market that fall under the scope of the Carbon Border Adjustment Mechanism, measure and document embedded emissions per EU methodology and provide SAF-HOLLAND with verified data needed for CBAM declarations.
- Documentation: Maintain policies, assessments, training records, audit reports and corrective-action plans, and provide documents when relevant.
- Climate ambitions: Measure and strive to reduce greenhouse-gas emissions; SAF-HOLLAND may request related data.

VI. Integrity, Ethics & Business Conduct

- Fair competition: Follow competition and antitrust laws; avoid sharing sensitive market information.
- Anti-corruption: Avoid offering, giving, requesting or accepting improper advantages. Maintain appropriate internal controls.

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- Conflicts of interest: Business decisions should be based on objective criteria and not influenced by personal interests.
- Confidentiality & data protection: Protect confidential information and comply with applicable data-protection laws.
- Trade compliance: Follow export-control, sanctions and customs regulations applicable to your business.
- Money laundering & terrorism financing: Maintain financial integrity and comply with all applicable laws.

VII. Grievance & Remedy

Suppliers are encouraged to maintain confidential and accessible channels through which workers and external stakeholders can raise concerns. These mechanisms should protect individuals from retaliation and ensure that all reports are handled responsibly. When issues are identified, suppliers are expected to take appropriate action to investigate the matter and provide or support remedy where harm has occurred. Suppliers should also inform SAF-HOLLAND without undue delay of any significant incidents related to human rights, ethical conduct or environmental matters. Concerns specifically involving SAF-HOLLAND may be submitted through our electronic whistleblower system.

VIII. Assessments, Collaboration & Improvement

SAF-HOLLAND may use questionnaires, documentation reviews, site visits, or interviews to understand how suppliers manage responsible sourcing topics. Suppliers are encouraged to cooperate openly, provide truthful information, and actively participate in improvement plans when needed. If a supplier persistently fails to align with expectations or does not demonstrate progress, this may lead to suspension or termination of the business relationship.

IX. Training & Capacity Building

Suppliers are encouraged to provide training to relevant employees on the CoC, these expectations, and the use of SAF-HOLLAND's electronic whistleblower system. So that all staff members involved with SAF-HOLLAND can report concerns. SAF-HOLLAND may offer guidance or workshops where useful.

X. Targets & Continuous Progress

SAF-HOLLAND has set clear targets to strengthen supplier responsibility and compliance:

- All suppliers must sign the SAF-HOLLAND Supplier Code of Conduct (CoC). This is a mandatory requirement for all business partners.
- All relevant suppliers will be invited to complete a Supplier Assessment Questionnaire (SAQ) through a third-party sustainability risk monitoring system. This requirement will progressively expand over time to cover more supplier risk categories and lower spend thresholds by 2030.

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- High-risk suppliers identified through the SAQ must implement mitigation actions. SAF-HOLLAND reserves the right to exclude suppliers from future contracts if they remain high risk and fail to remediate.
- Specific timelines, as well as risk and spend thresholds for SAQ coverage, are defined in SAF-HOLLAND's sustainability implementation roadmap and updated annually in the sustainability report.

XI. Data Protection & Reporting

Personal data connected to responsible-sourcing activities should be handled according to applicable data-protection laws. Suppliers are encouraged to inform SAF-HOLLAND promptly of significant incidents, legal actions or sanctions relevant to these expectations.

XII. Governance & Acknowledgement

This policy serves as practical guidance supporting the SAF-HOLLAND Supplier Code of Conduct, which remains the binding document supplier's sign. By working with SAF-HOLLAND, suppliers acknowledge these expectations and commit to continuous improvement in responsible sourcing, in line with these principles.

This policy was approved by Management Board/Executive Committee.