YANTAI TIANMAO EDIBLE OIL CO., LTD.

Sustainability Action Plans and Measures

可持续性的行动计划及举措

The Government of China has an overall strategy for the development of a Harmonious Society by 2020 that is focused on human progress, social civilization and sustainable development, parallel with the country's rapid emergence as a key player in the global economy. In the area of sustainable development, China has made commitments towards global agendas such as mitigation of climate change and biodiversity protection. As a major importer of palm oil and as a potential upstream producer, China can play a significant role in the sustainable development of this sector. The international palm oil industry and various national and international stakeholder groups have been meeting since 2004 to address serious concerns about how to make this very important commodity grow in production volume but without current levels of forest loss and environmental degradation.

中国政府制定了 2020 年和谐社会的总体发展战略规划,该规划主要关注人类进步、社会 文明和可持续发展,其目标是促进中国在全球经济中迅速崛起。在可持续发展领域,中国已 经开始履行减缓气候变化和保护生物多样性等方面的承诺。作为棕榈油的主要进口国,以及 海外棕榈油的潜在生产者,中国对该领域的可持续发展发挥着重要的作用。2004 年以来,国 际棕榈油行业及利益相关方多次举行会议,以解决大家高度关注的问题,即在不破坏森林或 没有环境退化的情况下提高棕榈油的产量。

The RSPO definition for sustainable palm oil production methods is that they should be "comprised of legal, economically viable, environmentally appropriate and socially beneficial management and operations." YANTAI TIANMAO EDIBLE OIL CO., LTD. highly agrees with that.

可持续棕榈油圆桌会议认为,可持续棕榈油生产方式应该是由"合法性、经济可行性、 环境合理性,以及社会利益的管理和运作"组成的。烟台天茂油脂有限公司对此观点表示高 度赞同。

From the socio-economic point of view, palm oil in producing countries such as Malaysia and Indonesia has contributed significantly towards job creation, reduction of poverty and regional economic development. However, other stakeholders particularly NGOs have raised serious

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concerns over unsustainable expansion of the sector that could cause further destruction of the remaining tropical forests and their rich biodiversity. Deforestation, particularly in fragile landscapes such as the extensive peat lands of Indonesia, could lead to substantial greenhouse emissions and contribute to climate change. The massive expansion in oil palm cultivation in the past few decades, particularly in Indonesia has also resulted in numerous social conflicts involving plantation companies and development agencies and indigenous peoples, local communities, smallholders as well as workers in the sector. The Government of Indonesia and other countries such as Brazil interested in expanding palm oil production have indicated their concern that future development should done on a sustainable basis.

从社会经济角度来看,棕榈油生产国(如马来西亚和印度尼西亚)的棕榈油生产对创造就业机会、减少贫困及促进区域经济发展做出了巨大贡献。但是,其他利益相关者,特别是非政府组织对这种盲目扩张的不可持续的做法表示严重关切,他们认为这些做法可能导致现有热带雨林及其丰富的生物多样性遭到破坏。砍伐森林,特别是对生态脆弱地区如印度尼西亚泥炭地的森林砍伐,可能会导致大量温室气体排放。在过去几十年里,大规模扩张油棕种植面积,特别是在印度尼西亚,引发了种植公司、政府机构以及土著居民、地方社区、小农和部门工人之间大量的社会矛盾。印度尼西亚和其他国家(如巴西)政府都表示,未来棕榈油发展应该建立在可持续的基础之上。

In the process of pursuing sustainable development, YANTAI TIANMAO EDIBLE OIL CO., LTD. will face many challenges. Therefore, we have developed our own sustainable development plans:

在追求可持续发展的过程中会面临许多挑战,为此,烟台天茂油脂有限公司制定了自己的可持续性的发展计划:

1. Start applying to join RSPO

着手申请加入国际可持续棕榈油圆桌会议

Through the international Roundtable on Sustainable Palm Oil (RSPO) principles and criteria for sustainability have been defined and formulated into a certification system of relevance to the entire palm oil market supply chain. This certification system is now being introduced throughout the world with considerable uptake and interest not only on the part of producers and producer countries but also on the demand side, especially in Europe and a variety of multinational

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companies. If we can join RSPO, it will be of great help to the sustainable development of our company. In 2021, our company submitted a membership application request on the RSPO official website and approved the application. However, it was temporarily suspended due to missing the payment deadline. As the company's emphasis on sustainable development gradually increases, joining RSPO membership is imperative. Our company will also adopt a responsible attitude towards suppliers and activate this plan at any time.

国际可持续棕榈油圆桌会议(RSPO)界定了棕榈油产业可持续发展的原则和标准,同时制定了针对整个棕榈油市场供应链的认证体系。此认证系统目前已经在全国范围内进行实施,它不仅受到生产商和生产国的大力支持,而且也引起了需求方,特别是来自欧洲和许多跨国公司等的高度关注。如果能加入 RSPO,会对天茂油脂的可持续性的发展有很大帮助。2021 年时,我司在 RSPO 官网提交了会员申请需求并已通过申请,最终因错过缴费时限暂时搁浅。随着公司对可持续发展重视程度的逐渐增加,加入 RSPO 会员势在必行,我司也会抱着对供应商负责任的态度,随时启用该计划。

2. Establish the company's own Policy Objective for Sustainable Palm Oil 建立企业自身的可持续棕榈油政策目标

To import and utilize only palm oil that is produced in a sustainable fashion according to Chinese and/or internationally recognized standards. It is an objective that could be started with pilot initiatives and fully implemented over a decade. In this way, our company will meet our growing demand without excessive environmental damage in the producing countries. We have achieved 100% TTM in 2021 and will continue to maintain this record. In terms of TTP, our company achieved 50% in 2021 and is expected to achieve 80% in 2023. The main task now is to strengthen communication with suppliers, work closely with them to find ways to achieve the goal of 100% TTP as soon as possible. At the same time, it is necessary to continuously monitor the VDF data and achieve the goal of 100% VDF as soon as possible also.

只进口和使用被中国和/或国际认可的认证可持续棕榈油。该目标可以采用循序渐进的方式,比如先提出一个初步的指导性方案,但具体实现可能需要数十年的时间。这样公司的棕榈油进口在满足自身需求的基础上,也不会对棕榈油生产国带来严重的环境影响。我司已在 2021 达成 100%可追溯到压榨厂,并且将继续维持这项纪录。而可追溯到种植园方面,我司 2021

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年达成了 50%, 而 2023 年预计可以实现 80%, 接下来的主要任务是加强跟供应商的沟通,通过和供应商的密切配合,共同想办法,争取尽早达到 100%TTP 的目标。同时也要持续关注 VDF 的数值,同样要尽早达到 100%的目标。

By 2025, our goals are as follows:

到 2025 年, 我司的目标如下:

Ambitions 目标	Yr2023	Yr2024	Yr2025
Traceability to Mill % 可追溯到压榨厂(百分比)	100	100	100
Traceability to Plantation % 可追溯到种植园(百分比)	80	90+	100
Verified Deforestation-free % 经核实无毁林行为(百分比)	80	90+	100

3. Raise awareness of sustainable palm oil consumption

提高企业自身可持续棕榈油的消费意识

The awareness of relevant government agencies, retail businesses, manufacturers using palm oil, traders, domestic consumers and others needs to be significantly increased, since this environment and green economy subject is currently not receiving much attention either at the policy or operational level, or as a factor in consumer decision-making within China. Only by establishing a strong awareness related to green food, low carbon lifestyle and maintaining a moderate ecological footprint can the awareness of sustainable palm oil consumption be gradually increased. Our company should be slowly guided in this direction and promote the establishment of this awareness as soon as possible.

无论是在政策或业务层面,还是在消费者意识中,在中国以绿色消费为主题的经济并没有得到充分重视。有关政府机构、棕榈油供应链上的贸易商、制造商、零售商、消费者和其他使用者的可持续发展意识有待增强。只有建立一种与绿色食品、低碳生活方式、维持适度的生态足迹相关的强烈意识才能逐步提高可持续棕榈油的消费意识。烟台天茂油脂要慢慢往此方向引导,尽早促成这种意识的建立。

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In order to achieve our goal, we have also developed corresponding measures:

为实现我司的目标,我司也制定了相应措施:

1. Choose suppliers with higher sustainability performance

选择具有更高可持续性表现的供应商

The steady development of the company has enabled our company to have many stable suppliers to choose from. At present, our company selects suppliers with relatively good sustainability performance when purchasing, and also focuses on sustainable development when developing new suppliers. Suppliers with poor sustainability performance will not be considered. At the same time, we also attach great importance to the preferred suppliers list provided by downstream suppliers, which can be used as a reference to optimize the supply chain and make sure that the volume comes from excellent upstream.

公司的稳步发展使我司得以有很多稳定合作的供应商可以选择。目前我司采购时都会选择在可持续性方面表现相对较好的供应商,在开发新供应商时也会把可持续发展这一项作为重点的考察项目,可持续性表现差的供应商不予考虑。同时,也高度重视下游供应商提供的建议采购供应商清单,以此作为参考来优化供应链,确保供给的产品来源于优质上游。

2. Choose suppliers with high traceability

选择可追溯性高的供应商

When purchasing, choose suppliers with relatively complete traceability systems, and prioritize suppliers with a high percentage of TTM and TTP. At the same time, urge suppliers with low traceability to improve their relevant systems as soon as possible. Regularly require suppliers to update their company's TTM and TTP data to track their sustainability progress.

采购时选择可追溯系统相对完善的供应商,优先选择可追溯到压榨厂和可追溯到种植业百分比高的供应商。同时督促可追溯性较低的供应商尽快完善相关体系。定期要求供应商更新他们公司的 TTM 以及 TTP 数据以跟踪供应商可持续性方面的进展。

3. Require the supplier to choose the mills with the higher sustainability performance 要求供应商择优选择压榨厂

Require suppliers to give preference to mills with high sustainability performance.

要求供应商在选择压榨厂时优先考虑可持续性表现较好的压榨厂。

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4. Publish sustainability related documents on the company's official website 在公司官网上公布可持续性发展的相关文件

Publish the company's sustainability action plan and measures, as well as the Grievance Mechanism on the company's official website for upstream and downstream suppliers to view and understand and support the company's policies.

将公司可持续性的行动计划及举措、举报申诉机制公布在公司官网上以供公司上下游的供应商查看并了解与支持公司的政策。

5. Update the company's NDPE IRF report annually 每年更新公司的 NDPE IRF 报告

Update the company's NDPE IRF report annually based on the NDPE report of the suppliers supplying the company, in order to report to downstream suppliers on the compliance progress of the company's processing and procurement volume.

每年根据向公司供货的供应商的 NDPE 报告更新公司的 NDPE IRF 报告,以此向下游供应商报告公司加工和采购量的合规进展。

To meet the challenges from sustainable development, participants in the palm oil supply chain must work together. YANTAI TIANMAO EDIBLE OIL CO., LTD. adheres to the firm belief, regards that as their own task and goal to gradually advance, and strives to make their own contributions.

为迎接来自可持续发展的挑战,棕榈油供应链的参与者必须共同努力。烟台天茂油脂有限公司秉承坚定的信念,将此作为自己的任务及目标逐步推进,努力做出自己应该有的贡献。

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Sustainable Palm Oil Policy 可持续棕榈油政策

YANTAI TIANMAO EDIBLE OIL CO., LTD's Sustainable Palm Oil Policy (hereafter "the Policy") aims to drive the transformational change needed in the palm oil supply chain. TIANMAO is committed to helping oil industry develop while protecting forests and peatlands, and respecting the rights of workers and communities in which we operate.

烟台天茂油脂有限公司可持续棕榈油政策(简称"政策")目的是推动棕榈油供应链的变革。 天茂致力于帮助棕榈油产业发展,同时保护森林和泥炭地,尊重工人和社区的权利。

The Policy applies to all of the palm oil trades of TIANMAO. It applies to all our suppliers. 该政策适用于天茂所有的棕榈油交易。它适用于我们所有的供应商。

- 1. No deforestation 无毁林
- No conversion of High Conservation Value (HCV) areas.
 不转换高保护价值区域。

TIANMAO is committed to identify and protect HCV areas in all estates within our supply chain under the full scope of this policy. The process of identifying if HCVs are present, potentially present or absent in an area where development will take place is led by a Licensed HCV Assessor in collaboration with local stakeholders. HCVs are biological, ecological, important at the national, regional or global level. All natural habitats possess inherent conservation values, including the presence of rare or endemic species, provision of ecosystem services, sacred sites, or resources harvested by local residents. There are six categories of HCVs:

天茂承诺在本政策的范围内,在我们的供应链中的识别和保护高保护价值区域。识别供应链中是否存在或潜在存在高保护价值区域或判定在即将开发的地区是否存在潜在的高保护价值区域的过程,将由 HCV 审核员和当地利益相关方合作共同进行。HCV 是在国家、区域或全球具有重大或极其重要意义的生物、生态、社会或文化价值。所有自然栖息地都具有固有的保护价值,包括稀有或特有物种的存在。提供生态系统服务、宗教场所或当地居民收获的资源。可以分成 6 类高保护价值区域(HCVs):

- Species Diversity: Concentrations of biological diversity including endemic species and rare, threatened or endangered species, that are significant at global, regional and national levels.
 - 物种多样性:生物多样性集中,包括在全球,地区或国家层面的具有重要意义的特有物种和稀有受威胁或濒危物种。
- (2) Landscape Level Ecosystems: Large landscape-level ecosystems, ecosystem mosaics and intact forest landscapes that are significant at global, regional or national levels, and that

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contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

景观级生态系统:在全球,地区或国家层面有重大意义的大型的景观级生态系统、镶嵌生态系统和原始森林景观,并在自然分布和丰富的自然格局中包含绝大多数自然物种的存活种群。

- (3) Ecosystems and Habitats: Rare, threatened or endangered ecosystems, habitats or refuges. 生态系统和栖息地,稀有的,受威胁的或濒危生态系统,栖息地或保护区。
- (4) Ecosystem Services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes. 生态系统服务: 危急情况下基本的生态系统服务,包括保护水资源集中区域和控制脆弱土壤和斜坡的侵蚀。
- (5) Community Needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, .etc), identified through engagement with these communities or indigenous peoples. 社区需要:满足当地社区或土著居民基本需要的地点和资源(用于生计,健康,营养,水等),通过与这些社区或土著居民接触来确定。
- (6) Cultural Values: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples.

文化价值:具有全球或国家文化、考古或历史意义的地点、资源、栖息地和景观,或/和通过与这些地方社区或土著人民的接触,确定对当地社区或土著人民的传统文化的生态、经济或宗教的重要性。

No conversion of High Carbon Stock (HCS) forests.
 不转换高碳储量森林。

TIANMAO is committed to no conversion of High Carbon Stock (HCS) forest in the supply chain. The vegetation in an area of land can be stratified into six different classes. They are: High Density Forest, Medium Density Forest, Low Density Forest, Young Regenerating Forest, Scrub, and Cleared/Open land. The first four classes are considered potential High Carbon Stock forests.

天茂承诺不转换高碳储量森林。某一地区的植被可以被划分为六个不同的等级。他们是: 高密度森林、中等密度森林、低密度森林、幼龄林、灌木和砍伐迹地/开阔空地。前四类 被认为是潜在的高碳储量森林。

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(1) High Density Forest: Remnant forest of advanced secondary forest close to primary condition.

高密度森林:接近原始状态的高级次生林。

- (2) Medium Density Forest: Remnant forest but more disturbed than High Density Forest. 中等密度森林: 比高密度森林受到更多干扰的次生林。
- (3) Low Density Forest: Appears to be remnant forest but is highly disturbed and recovering with composition of older forest.
 低密度森林: 类似于次生林但受到高度干扰并且随着古老森林逐渐恢复。
- (4) Young Regenerating Forest: Mostly young regrowth forest that have regenerated over 10 years but with occasional patches of older forest. 幼龄林: 大多数是已经再生 10 年以上的年轻的再生森林,但偶尔会出现一些古老森林。
- (5) Young Scrub: Areas that have been cleared within the last 10 years with some woody regrowth of pioneer species and grass-like ground cover. 灌木: 在过去 10 年之内被砍伐的地区,覆盖的地面再生优势物种的木本植物和草本植物。
- No burning for the preparation of new plantings and re-plantings. 新种植和再种植前没有经过炼山整地的林地。
- 2. No development on peat 无泥炭地开发

TIANMAO is committed to protecting peat defined as soil containing greater than 65% organic matter, regardless of depth.

天茂承诺保护被定义为土壤中含有大于65%有机质额泥炭地,无论深度多少。

• No new development on peat.

没有新开发的泥炭地。

- Explore options for peat restoration where feasible.
 在可行的情况下,探索泥炭地恢复方案。
- 3. No Exploitation of People and Local Communities 对当地社区和人无任何剥削

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Respect and support the Universal Declaration of Human Rights.

尊重和支持"世界人权宣言"。

TIANMAO recognizes the inherent dignity of the individual and supports the Universal Declaration of Human Rights by the United Nations.

天茂维护个人的固有尊严并且支持联合国"世界人权宣言"。

 Respect and recognizes the rights of all workers including contract, temporary and migrant workers.

尊重和承认所有工人的权利,包括合同工人、临时工人和流动工人的权利。

TIANMAO is committed to ensuring that the rights of all workers, including contract, temporary and migrant workers, are respected according to local, national and ratified international laws and that international best practices and adopted where legal frameworks are not yet in place. It is our priority to comply with relevant legislative objectives and moral obligations to create, build and promote a harmonious, safe and healthy work environment and culture. The following principles are core elements that will guide TIANMAO's operations: 天茂致力于确保根据当地、国家和批准的国际法尊重所有工人的权利,包括合同工人、临时工人和流动工人的权利,并确保在尚未建立法律框架的地方采用国际最佳措施。我们的首要任务是遵守有关的立法和道德约束,创造、建设和促进和谐、安全和健康的工作环境和文化氛围。下列原则是指导天茂的核心要素:

(1) No Forced or Bonded Labour

无剥削或强迫劳工

TIANMAO and its suppliers shall not knowingly employ or support the use of forced or bonded labour or human trafficking and shall take appropriate measures to prevent the use of such labour in connection with the TIANMAO and suppliers' operations. There will also not be any restrictions on the workers' freedom of movement during their free time. Employer shall not withhold and property, identification cards, passports or other travel documents without workers' prior consent.

天茂和其供应商不得雇佣或支持强迫或剥削劳工或贩运人口,并应采取适当措施,预 防与供应商的有关的业务剥削或强迫劳工。工人在空闲时间内的行动自由也不会受到 任何限制。未经雇员事先同意,不得扣押任何财产,身份证,护照或其他旅行证件。

(2) No Child Labour

无童工

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TIANMAO and its suppliers shall not knowingly employ or support the use of child labour. Remedial actions which appropriate follow up actions shall be employed if any child labour case is uncovered to protect the welfare of the child.

天茂和其供应商不得雇佣或支持使用童工。如果发现有任何雇佣童工事件,应采取补救行动,并采取适当的后续行动,以保护儿童的权益。

(3) Occupational Safety and Health

职业安全和健康

TIANMAO and its suppliers shall strive to provide a safe and healthy workplace environment and take effective steps to protect employees from exposure to potential occupational safety and health hazards that are likely to pose an immediate risk of permanent injury, illness or death.

天茂及其供应商应努力提供安全健康的工作场所,并采取有效措施,保护员工免收可能造成永久性伤害,疾病及死亡的潜在职业安全和健康危害。

(4) Employment Contracts

雇佣合同

TIANMAO and its suppliers shall encourage that employees should be given written employment contract according to the local laws and regulations, in a language that they understand.

天茂及其供应商应鼓励以雇员能理解的语言,以书面形式依法与雇员签订雇佣合同。

(5) Freedom of Association and Right to Collective Bargaining

结社自由和集体谈判权

TIANMAO and its suppliers shall recognize and respect the right of employees to form and join trade unions of their choice subject to the provisions of relevant national legislation. 天茂及其供应商在遵守相关国家法律法规的情况下应承认并尊重雇员组织工会和参加雇员选择的工会的权利。

(6) Minimum Income Standard

最低收入标准

TIANMAO and its suppliers shall encourage all workers are paid a wage equal to or exceeding the legal minimum wage and are covered for work-related illness and injuries.

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天茂及其供应商应支持向所有工人支付工资相当于或超过法定最低工资标准,对雇员 因公患病,工伤有事先保障。

(7) Working Hours

工作时间

TIANMAO and its suppliers shall encourage that working hours comply with national legislation including overtime hours (which are on a voluntary basis).

天茂及其供应商应支持遵守国家法律规定的工作时间,包括加班时间(在自愿的基础上)。

(8) Equal Employment Opportunities

平等就业机会

TIANMAO and its suppliers shall encourage equal opportunities in the work place. All decisions relating to hiring, remuneration, access to training, promotion, termination or retirement will be made based on business needs, job requirements and individual qualifications and without regard to race, religion or gender.

天茂及其供应商应支持在工作场所所有平等的就业机会。所有有关雇佣、报酬、获得培训、晋升、解雇或退休的决定将根据商业需要、工作要求和个人资格作出,不分种族、宗教或性别。

(9) Harassment and Violence

骚扰和暴力

TIANMAO and its suppliers shall not tolerate any type of harassment or violence. 天茂及其供应商不得容忍任何形式的骚扰或暴力。

(10) Whistle-blowing

检举, 揭发

TIANMAO and its suppliers shall provide a confidential means for all personnel to report illicit (i.e. unethical or illegal) activities. TIANMAO shall refrain from disciplining, dismissing, or discriminating against any personnel for providing information on such activities. 天茂及其供应商应提供保密方法,提供给所有工作人员向公司报告不正当(比如:不道德或非法活动)的渠道。不得对任何提供此类信息的员工处罚、解雇或歧视。

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(11) Grievance Redress Procedure

申诉程序

TIANMAO and its suppliers shall provide a means for all personnel to air their grievances regarding their employment conditions, responsibilities, co-worker issues, promotion opportunities and other issues related to the work environment.

天茂及其供应商应提供能让所有员工就其雇佣条件、职责、与同事协助问题、晋升机 会和其他与工作有关的问题表达不满的途径。

Respect land tenure rights

尊重土地所有权

TIANMAO respects legal land tenure rights, and recognize duties and responsibilities associated with tenure rights, such as respect for the long-term protection and sustainable use of land and national resources. This is done in compliance with the national obligations, constitutions, local laws and regulations of the countries where we are operating. 天茂尊重合法的土地所有权,承认与土地所有权相关的义务和责任,例如尊重土地和国家资源的长期保护和可持续利用。这样做是承担我们在运营国家的责任,和遵守国家宪法和当地法律法规。

Resolve all complaints and conflicts through an open, transparent and consultative process.
 通过公开、透明和协商方式解决所有投诉和冲突。

4. Traceability to Known Sources

追溯到已知来源

TIANMAO is committed to gain visibility of our supply chain. It is necessary to work towards achieving traceability across all supply chain of suppliers.

天茂承诺获得清晰的供应链。实现供应商的所有追溯。

5. Supplier Requirements

供应商要求

TIANMAO is responsible for applying this Policy throughout our supply chain, including making suppliers aware of the policy and their responsibility to comply with it. TIANMAO requires suppliers to verify that the palm oil they supply to TIANMAO meets the criteria of this policy.

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天茂负责在整个供应链中实施本政策,包括使供应商重视该政策以及遵守该政策的责任。 天茂要求供应商核实他们向天茂供应的棕榈油是否符合本政策的标准。

TIANMAO commits to addressing allegations of supplier non-compliance with our Policy. Our approach is always to engage with our suppliers if a grievance has been raised against them, and where we can, to help them address any weaknesses in their policy or practices. Where a supplier refuses to remediate non-compliance, TIANMAO will take appropriate steps to address this in a manner that upholds commitment to our Policy. Suppliers failing to reasonably meet our requirements will be subject to sanction up to and including non-renewal or termination of contracts.

天茂承诺处理不遵守政策的供应商的指控,天茂将采用推动改善的方式来改变那些不遵守政策的供应商,并且在可能的情况下,帮助供应商解决他们在实施政策时遇到的问题。如果供应商拒绝改变他们不遵守政策的情况,天茂将坚守政策的实施并采取措施来解决这一问题。 未能合理满足天茂可持续棕榈油采购政策的供应商将受到处罚,包括不续签或终止合同。