

Nordzucker's Human Rights Policy

Our commitment to Human Rights

Nordzucker is committed to developing an organizational culture and a general conduct of respect and support for internationally recognized human rights¹ and seeks to avoid complicity in any human rights abuse through its activities and business relationships. We support the principles contained within the UN Guiding Principles on Business and Human Rights.

This Policy applies to all employees of Nordzucker Group and to all subsidiaries and affiliates worldwide. It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third party contractors. All our suppliers are strongly encouraged to adopt the same or similar standards, and stipulate the same expectations of their suppliers – the Nordzucker's sub suppliers.

Salient human rights

Nordzucker Group operates mainly in the EU and Australia where the risk of human rights violation is low. However, more work is required to understand and mitigate human rights risks in our supply chain. We believe our main responsibilities lie in a number of critical areas:

- Occupational health and safety,
- Forced labour and modern slavery,
- Child labour,
- Working conditions and discrimination,
- Right to association,
- Land rights,
- Water contamination and contribution to climate change.

Implementation of the Human Rights Policy

The Policy is primarily implemented through our human rights due diligence to identify, prevent and mitigate human rights risks. The above-identified salient human rights are a focus of our Country Risk Assessments that are conducted prior to taking up any new activities in countries where Nordzucker has no previous experience in and reviewed periodically, especially in countries that have been identified as high risk or medium risk. We further evaluate our direct business partners, particularly in emerging markets, through Suppliers Desktop Questionnaires and undertake audits of our most risky suppliers. As a minimum, Nordzucker always audit key suppliers from regions where we do not have prior experience, and where repeated business is intended. Where we identify that they have caused or directly contributed to adverse human rights impacts, we will engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.

¹ Defined in the International Bill of Human Rights and the ILO's Declaration on the Fundamental Principles and Rights at Work

Reporting a breach of the Human Rights Policy

Any breach of this Policy is also considered to be a breach of the Nordzucker's Code of Conduct and should be reported promptly. If any employee or other relevant stakeholder believes that someone is violating human rights in the scope of Nordzucker's business activities, they are asked to report it immediately to their manager, HR or the Nordzucker's Ethical Committee, e.g through the whistleblowing web-reporting tool, SpeakUp. This tool can be accessed by all stakeholders to report anonymously any issues regarding labour practices and other matters in our supply chain.

Corrective actions

When Nordzucker encounters potential human rights violation in the supply chain, we do not withdraw as the first reaction, but rather work actively with the suppliers to address these issues.

We will:

- Inquire into the subject and evaluate the case,
- Set up demands and corrective actions,
- Follow up in an active engagement process with the suppliers, ensuring implementation of the mitigation plan, and
- Ensure effective remedy.

All violation of fundamental human rights demands a response by the supplier and a follow-up by Nordzucker in the form of constant monitoring. We strongly believe that by doing this, we can contribute to an improvement of human rights conditions.

Terminating a supplier relation

Nordzucker will terminate a supplier relation in case of:

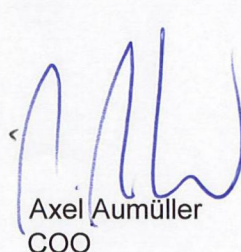
- A violation of the fundamental human rights or something of similar severe nature, which is done knowingly.
- An unwillingness to engage with Nordzucker on human rights issues either through refusing to respond or by denying access.
- No inclination or ability to improve even after Nordzucker has engaged with the supplier.

All heads of functions are responsible for ensuring adherence to these commitments and our TOP management has responsibility for overseeing their implementation and ensuring that any breaches of our Human Rights Policy are thoroughly investigated.

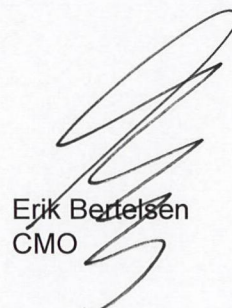
Braunschweig, 08 June 2020



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