



EQUATORIAL

T R A D E R S

Unit 3, 102 Camley Street, King's Cross, London N1C 4PF
+44 208 864 9422 www.equatorialtraders.com

Working Document Ref: ISO90012015 -M16 Version 01	SUPPLIER CODE OF CONDUCT	30TH April 2024
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Our Commitment

We are committed to playing a positive role in the modern world where we can support a thriving coffee community and ensure the best sustainable and ethical practices are embedded into our supply chains and daily work.

Our Expectations

We want all our stakeholders, up and down stream, as well as the community at large to hold the same values and feel the same duty to uphold and fulfil economic, social and environmental responsibilities. We want our values and commitments to be aligned with our stakeholders. We expect all our suppliers to be making active steps towards building up their internal systems and ways of working to ensure that positive impact flows throughout the supply chain and beyond. We understand that we need to collaborate with all our suppliers to ensure a resilient and healthy supply chain.

Supplier Commitment

By agreeing to Equatorial Traders' Supplier Code of Conduct we are aligning a common goal to work positively together to build a healthy, clean and resilient supply chain.

Ensuring compliance to the code

We expect our suppliers to follow the principles of this code. Suppliers shall where possible communicate the requirements of this Code of Conduct to their employees and ensure their compliance. Farmer groups shall communicate the requirements to their members and ensure their compliance.

With respect to their own suppliers, suppliers shall:

- communicate the requirements of this Code of Conduct to their suppliers, up to the product origin;
- ensure that they procure goods only from suppliers that respect the elements detailed in this code of conduct;
- inform if their suppliers experience challenges applying the principles of this code of conduct;
- work with non-compliant suppliers to develop, implement and monitor action plans to resolve challenges.

Suppliers may be requested to supply evidence of compliance and Equatorial Traders reserves the right to conduct inspections to verify compliance with the Supplier Code of Conduct up to the product origin. In case a supplier is consistently found to be non-compliant, and does not demonstrate adequate effort to improve compliance, Equatorial Traders reserves the right to suspend procurement of products coming from this supplier.



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Principles of the Code of Conduct

1. Governance
 - a. Business Ethics
 - b. Quality
 - c. Legal Compliance
 - d. Record Keeping and Transparency
 - e. Due Diligence
2. Social
 - a. Equality and Diversity
 - b. Equal and Fair Pay
 - c. Grievance Policy
 - d. Child Labour
 - e. Modern Slavery (Human trafficking and forced labour)
 - f. Anti-Bribery
 - g. Freedom of Association and Collective Bargaining
 - h. Worker Health and Safety
 - i. Land Rights
3. Environmental
 - a. Sustainability and Environmental Impact
 - b. EUDR Compliance
 - c. Forest and Eco-System Conservation, Bio-diversity
 - d. Protection of Water Sources and Waste Management
 - e. Responsible Chemical Management

1. GOVERNANCE

a. Business Ethics

Equatorial Traders is committed to conducting business ethically and lawfully in countries where we operate across our supply chain. We do business with suppliers and business partners who demonstrate a strong commitment to ethical behaviour. All business relationships and transactions with the companies in the supply chain must conform to local laws and be conducted with the utmost integrity and honesty including in particular: responsible sourcing, anti-corruption, privacy & confidentiality, financial responsibility, fair competition, conflict of interest, whistle blowing protection & non retaliation.

b. Quality

Equatorial Traders is committed to maintaining the highest quality in their service, delivery and sourcing of product. We have strict quality controls in place for ensuring safety and fulfilment of contractual obligations. We expect suppliers to uphold the same standards for quality throughout their operations and supply chain.

c. Legal Compliance



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Suppliers shall comply with all relevant local laws and regulations that govern their operations, including local labour, social security and environmental laws. If the requirements in this code differ from those requirements set out in applicable local laws, suppliers shall apply the higher standard.

d. Record-keeping and Transparency

Equatorial Traders complies with legislation of England and Wales on record keeping for full transparency, traceability and accountability and undergoes independent auditing on an annual basis.

Suppliers are expected to keep accurate records of product movements, employment, sourcing and accounting in line with the local legislation and systems in their country. Where appropriate records should be audited and transparent.

e. Due Diligence

Equatorial Traders is committed to performing due diligence to protect the interests of the company, the coffee community at large and all stakeholders within the coffee supply chain. Suppliers are expected to carry out and document their own due diligence where appropriate.

2. SOCIAL

a. Equality and Diversity

Equatorial Traders is an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. Suppliers are expected to align with the same values of equality and diversity within their business.

b. Equal and Fair Pay

We will ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value. Suppliers must ensure fair wages to all their workers in line with local legislation and minimum wage. Wages and overtime payments must be paid in full, on time and at least on a monthly basis. Suppliers must assess and acknowledge the right to fair pay that ensures their workers are able to cover their basic needs and provide some discretionary income.

c. Grievance Policy

Our suppliers are expected to maintain a grievance mechanism that ensures confidentiality, transparency. It must be unbiased, responsive and anonymous, and be clearly communicated to employees, workers and other parties in the supply chain to allow for confidential and safe reporting.

d. Child labour

We operate a No Child Labour policy. This means that we ensure there is no employment of underage / child workers and that safeguards are in place for young workers. We also expect our suppliers to adopt the same policy and approach towards ensuring there is no child labour in their business.

e. Modern Slavery Statement, (human trafficking and forced labor)



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The Modern Slavery statement is made pursuant to 54(1) of the Modern Slavery Act 2015 and sets out the steps that Equatorial Traders Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Equatorial Traders Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Suppliers must ensure they do likewise.

f. Anti Bribery

In the UK it is illegal to offer, promise, give, request, agree, receive or accept bribes. We adhere to the UK Anti Bribery Act 2010. We expect suppliers to uphold the same standard for anti-bribery.

g. Freedom of association and collective bargaining

Suppliers must respect the right of workers to associate freely, form and join workers organizations of their own choice, seek representation, and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations. In cases where freedom of association is restricted by local law, alternative means of freedom of association will not be obstructed.

h. Worker Health and Safety

Equatorial Traders requires that all suppliers' workers be provided with a safe and healthy working environment. Workers have the right to refuse and report unsafe or unhealthy working conditions regardless of role, title or responsibility. Workers must be trained on the appropriate occupational health and safety policies and procedures, including emergency evacuation procedures prior to employment and then on a regular basis in the primary language(s) of its workers. Workers will also be provided with appropriate protective equipment and instructed on appropriate use.

i. Land Rights

Equatorial Traders is committed to following the principles of Free, Prior and Informed Consent (FPIC) for property or land negotiations. All forms of land grabbing are prohibited. Our suppliers will not operate on grabbed land or any land that has pending court cases. We will not knowingly conduct any business with a supplier operating on grabbed land or any contentious land.

3. ENVIRONMENT

a. Sustainability and Environmental Impact

We are committed to reducing our environmental impact across our supply chain and to supporting sustainable operational and agricultural best practices. Suppliers shall be compliant with relevant environmental laws and regulations and shall use resources in an efficient and sustainable way as they strive to minimise their impact on biodiversity, climate change and water scarcity. Suppliers are also encouraged to look for cost-effective methods of improving energy efficiency by minimizing their energy consumption and greenhouse gas emissions, considering a life cycle perspective.



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b. EU Deforestation Regulation Compliance (EUDR)

We are committed to ensuring that coffee is not produced on newly deforested land. Stopping deforestation is integral to combatting climate change and preserving natural resources and environments. Equatorial Traders is committed to sourcing EUDR compliant coffee. Suppliers are expected to ensure that their supply chains are compliant with the new EUDR legislation.

Suppliers are expected to be able to be accountable and provide full transparent traceability for all coffee and be compliant with the legislation. Suppliers must give evidence that they are compliant with all local laws regarding human rights, land rights, environmental standards and indigenous rights within their operating origins. We are committed to ensuring appropriate measures to support long term protection of natural forests have been taken across our supply base and expect Suppliers to do the same. Suppliers must commit to Equatorial Traders *EUDR Supplier Engagement and Cooperation Policy*.

c. Forest and Ecosystem Conservation, Biodiversity

Suppliers shall not source or deliver products resulting from the destruction of important natural habitats, including legally protected areas, areas of high conservation value, that are recognized locally, nationally or internationally, important natural ecosystems including forests and peatlands, which have high carbon stocks.

Suppliers and employees shall preserve nationally protected species, and rare, threatened, or endangered species. They will adopt suitable practices to protect these species, their habitats and important sites on and around farms. Suppliers shall avoid introducing invasive and alien species, and adopt suitable practices to control them.

d. Protection of Water Sources and Waste Management

Suppliers shall avoid contamination or pollution of surface and groundwater sources in and around farms and factories, respecting minimum distances from water sources and preserving buffer zones of natural vegetation. Wastewater shall undergo appropriate treatment to minimize the load of contaminants. In water-stressed areas, Suppliers shall adopt suitable practices to use water sources efficiently.

Suppliers shall ensure that waste collection, storage and disposal are properly organised and that hazardous waste is treated and disposed of in a safe way. Suppliers shall strive to reduce, compact, reuse and recycle waste as much as possible.

e. Responsible Chemical Management

Suppliers are expected to identify and manage chemicals to ensure their safe handling, storage, use, recycling and disposal. It is also expected that all suppliers will use the recommended chemicals including fertilizers, pesticides, herbicides for their day to day farm use and not use chemicals that have been prohibited globally. Suppliers shall strive to reduce the amounts of agro-chemicals used.

Supplier Name and Address:

Signed by Supplier:

Date: