PALM OIL SOURCING POLICY



PREAMBLE

At Peter Greven, sustainability and the responsible use of natural resources have always been a fundamental aspect and are firmly established in their corporate philosophy. Therefore, all products are based on natural, renewable raw materials and the sourcing of sustainable raw materials – especially when it comes to palm oil – is important.

Palm Oil is the world's leading vegetable oil in terms of production volume and consumption and by far the most efficient vegetable oil regarding production volume per hectare. We therefore support the use of sustainably certified palm oil and are committed to our role in moving the palm oil industry towards full sustainability.

This policy complements our Code of Conduct. The policy applies to all palm and palm kernel oil derivatives as the Peter Greven Group does not source any palm (kernel) oil directly.

1. COMMITMENTS

The Peter Greven Group is a member of the Roundtable on Sustainable Palm Oil ("RSPO") and fully supports the RSPO's vision to transform markets to make sustainable palm oil the norm. Peter Greven is committed to ambitiously increase the uptake of certified material with the ultimate goal to achieve fully certified sourcing of all palm(kernel)-based derivatives. We also work on improving the traceability in our palm oil supply chains, in a first step to the mills and ultimately to plantation level.

The Peter Greven Group recognizes the importance of smallholder inclusion in the palm oil sector. We are therefore committed to support projects that help smallholders to make changes to best practice and to improve access to certification. With the current FONAP project, which we support, we intensify our commitment in the largest palm oil producing country Indonesia and support smallholders in sustainable landscape management through social forestry, through the protection of water bodies and riparian zones and through regenerative agriculture.

The Peter Greven Group sees the need for further progress towards full sustainability in the palm oil sector. We are therefore committed to sourcing palm oil that has been produced without conversion of High Conservation Value ("HCV")¹ areas, High Carbon Stock ("HCS")² land or destruction of peatland regardless of depth and adherence to recognized international human rights and labor standards including free, prior and informed consent ("FPIC") of any affected local community where plantation development takes place. In addition

¹ https://www.hcvnetwork.org/about-hcvf/the-six-high-conservation-values

² http://highcarbonstock.org/

we support the add-on criteria of the Forum for Sustainable Palm Oil ("FONAP")³.

From our suppliers we require to adopt and fully adhere to strong No Deforestation, No Peat, No Exploitation (NDPE) policies in their own operations and 3rd party palm supply chain.

2. MILESTONES

- 2010: The Peter Greven Group officially joins the RSPO as a regular member.
- 2013: Peter Greven Nederland is the first metallic soap producer to receive the RSPO-SCCS-Certificate for the production and distribution of vegetable based stearates and dispersions containing RSPO MB certified fatty acids.
- 2015: Our headquarters in Bad Münstereifel (Germany) receive the RSPO-SCCS-Certificate.
- ▶ 2015: Peter Greven Nederland extends the RSPO certification to SG.
- 2016: Peter Greven Nederland launches the first products based on RSPO SG certified fatty acids.
- 2016: Peter Greven Nederland switches to purchasing 100% RSPO MB certified fatty acids.
- > 2017: Peter Greven Asia (Malaysia) receives the RSPO-SCCS-Certificate.
- 2017: Peter Greven Nederland joins the FONAP (Forum for Sustainable Palm Oil) as a supporting member.
- 2018: Peter Greven Physioderm GmbH receives the RSPO-SCCS-Certificate.
- ▶ 2019: Peter Greven Asia receives the MSPO certification.
- 2019: Peter Greven supports the FONAP smallholder project (second stage), which takes place in cooperation with the WWF Germany and the Malaysian non-profit organization Wild Asia.
- > 2020: The Peter Greven Group publishes the first mill list.
- > 2021: Norac Additives LLC receives the RSPO-SCCS-Certificate.
- 2022: Peter Greven Nederland switches all products in the Life Science Portfolio to RSPO MB certified quality.

3. GRIEVANCE PROCEDURE

The Peter Greven Group acknowledges that the RSPO has an established grievance procedure and takes guidance from the RSPO process for grievances, but also allows for parallel investigation and additional requirements.

Grievances related to Peter Greven's palm supply chain can be expressed using our standard grievance channels for code of conduct violations, i.e. via the

³ https://www.forumpalmoel.org/the-fonap/what-we-do

complaint web-form on our company's website or via email to our sustainability manager.

Contact details of the Grievance party are preferred to seek further clarification on the grievance. However, anonymous reporting is possible.

The Peter Greven Group will not tolerate any kind of retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated. We keep the information provided in the utmost confidence and access to the information is restricted and only allowed for those, who urgently need the information for handling the case.

All complaints received from customers or any other interested party relating to the palm oil supply chain will be formally acknowledged, recorded and action will be taken in a timely manner according to our grievance procedure flow below.

We review the effectiveness of the complaint mechanism at least once a year.



4. IMPLEMENTATION

The Peter Greven Group undertakes all appropriate and reasonable efforts to implement and to apply the principles and values described in this Policy in a continuous way and, where necessary, to remedy any existing deficits as soon as possible.

If Peter Greven becomes aware of a supplier violating or breaching these policy commitments, we will take appropriate action to investigate the issue within the framework of our grievance process. We will seek to work with the supplier to resolve it or ultimately, if no adequate resolution can be found, terminate commercial relations with the supplier.

The Peter Greven Group will regularly communicate on the progress relating to sustainable palm oil in the Annual Communication of Progress ("ACOP"), which is published on the RSPO website⁴.

Revised version June 2023

⁴ https://www.rspo.org/members/638/Peter-Greven-GmbH-Co.-KG