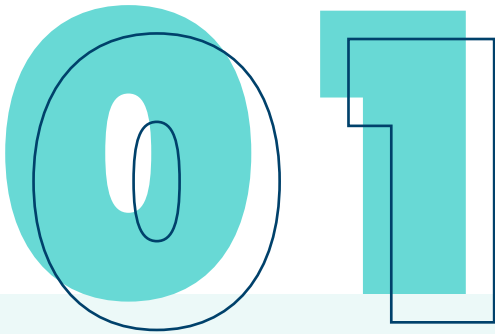


GROWING

Together

**RESPONSIBLE
PURCHASING POLICY**

GROUPE ROULLIER



FUNDAMENTAL PRINCIPLES OF

the Group's CSR strategy

The Groupe Roullier is an independent family-owned group that has been a committed international player for over 60 years.

Our 8 business activities develop sustainable solutions with high added value, all working to fulfil our shared ambition: "**Growing Together**".

Driven by the passion of our 8,500 employees, we bring bold new approaches to each of our markets (Agri-food and Health/Nutrition, Plant Nutrition, Animal Nutrition, Industrial Solutions, Algology and Renewable Energies), applying our philosophy throughout the value chain in order to boost sustainable growth.

Doing so involves taking account of our responsibilities regarding the full range of suppliers we work with, in order to build sustainable partnerships that enable us to offer products which respect the needs of both the environment and our customers.

- The **Group's CSR Strategy** is built around 3 key focus areas:
 - Guiding and supporting the farming world's shift towards sustainable, high-performance agriculture,
 - Contributing to the development of employees and partners,
 - Working to benefit the local region and alongside our customers.

We have also formalised a full set of behavioural and transparency rules via our **Group Code of Ethics and Compliance**. This code defines the rules for collective and individual conduct that will inform our actions and the choices we make in order to uphold our values and commitments on a daily basis.

Our PRINCIPLES reflect who and what we are, as well as serving as a guide for our conduct and the reciprocal expectations we apply to our business partnerships.

RESPECT

Groupe Roullier is steadfast in its respect for fundamental Human Rights and, above all, mutual respect between all its employees. Given our firm belief that development cannot be considered sustainable if it impinges upon the rights of any individual, we strive to apply this principle in the day-to-day performance of our business operations, making every effort to treat our customers, prospective customers, suppliers and sub-contractors with respect, courtesy and due consideration.

RESPONSIBILITY

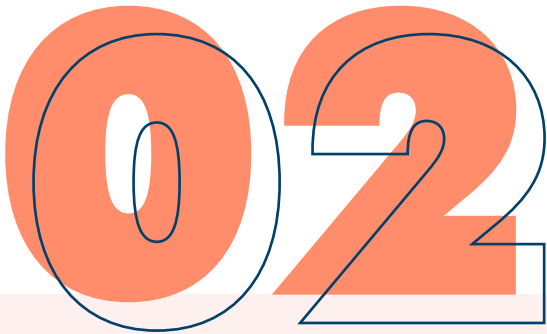
Groupe Roullier strives in all circumstances to act in accordance with applicable legal standards and regulations. Well-aware of the impact of our operations, we have adopted a voluntary, responsible approach to safety which applies to all our stakeholders. Groupe Roullier also makes active efforts to ensure the protection of the environment, through programs designed to minimise the environmental impact of its operations, its products and the means of transport it employs.

INTEGRITY

We act with integrity and probity, and in compliance with all applicable laws and regulations. Our employees are the guarantors of this principle in the context of our relationships with our counterparts, and they are required to maintain a certain standard of integrity and objectivity in the selection of our partners. We adhere to internationally recognised fiscal and accounting standards, and have hoisted the flag of prevention and detection of any and all forms of fraud and corruption as one of our top priorities.



Our **Responsible Purchasing Policy** stems from our values, our Code of Ethics and Compliance, and our Group CSR Strategy. It is designed to serve as a shared reference tool for our Purchasing teams and our suppliers.



022

AN INTERNATIONAL STANDARDS

*SDGs: Sustainable
Development Goals*



We've chosen to make our Responsible Purchasing Policy part of our Sustainable Development Goals structure, seeking to prioritise a common language and framework for action to describe our CSR commitments, share them with our stakeholders and leave their imprints on broader horizons.

The 17 Sustainable Development Goals (SDG) were adopted by the UN in 2015 as part of a program known as the 2030 Agenda. They represent a call to action to promote prosperity whilst protecting the planet at the same time, working towards a better and more sustainable future for all mankind.

As a multi-actor international benchmark, the SDGs provide macroeconomic guiding principles. They enable companies to structure their business approaches and start using sustainable development as a catalyst for innovation and sustainable performance.



03

OBJECTIVES

of our Responsible Purchasing Policy



The Responsible Purchasing Policy represents a cornerstone of our CSR strategy.

It is testament to our desire to integrate the principles of sustainable development into every area of our operations, and to promote them in our relationships with our business partners.



Our Responsible Purchasing Policy aims to achieve three objectives:

- **Boosting the overall performance level of the Group and its subsidiaries** by creating sustainable value and ensuring the availability of our products at the optimum total cost.
- **Building balanced relationships with our suppliers** and contributing to the creation of ethical and responsible supply channels.
- **Developing innovative partnerships with our suppliers** and sharpening our competitive edge.



OUR COMMITMENTS

*to sustainable development
and responsible purchasing*

- p.12 ● **04.1 Respecting** Human Rights
- p.13 ● **04.2 Combating** fraud and corruption
- p.14 ● **04.3 Fighting** to prevent climate change
- p.14 ● **04.4 Preventing** pollution
- p.15 ● **04.5 Encouraging** honest business practices in marketing and information exchange
- p.16 ● **04.6 Ensuring** the health and safety of consumers/users
- p.17 ● **04.7 Contributing** to improving working conditions and employees' health and safety
- p.18 ● **04.8 Favouring** and **encouraging** sustainable use of resources
- p.19 ● **04.9 Promoting** responsible consumption
- p.19 ● **04.10 Working** with local regions and communities

In a changing world, there are many challenges to sustainable development. We have chosen to target the most significant aspects for our business activities in order to reduce our negative impact throughout our value chain in a more efficient way, as well as creating a shift, along with our partners, towards more sustainable solutions with a positive global impact.

In all of our purchasing operations we shall work to ensure that the following 10 commitments are upheld and applied by our purchasers and suppliers.

For each commitment, we will specify the Group's content, objectives and/or practices, and our ambitions in terms of responsible purchasing.

	<p>RESPECTING HUMAN RIGHTS</p>		<p>COMBATING FRAUD AND CORRUPTION</p>
<p>FIGHTING TO PREVENT CLIMATE CHANGE</p>		<p>PREVENTING POLLUTION</p>	
	<p>ENCOURAGING HONEST BUSINESS PRACTICES IN MARKETING AND INFORMATION EXCHANGE</p>		<p>ENSURING THE HEALTH AND SAFETY OF CONSUMERS/USERS</p>
<p>CONTRIBUTING TO IMPROVING WORKING CONDITIONS AND EMPLOYEES' HEALTH AND SAFETY</p>		<p>FAVOURING AND ENCOURAGING SUSTAINABLE USE OF RESOURCES</p>	
	<p>PROMOTING RESPONSIBLE CONSUMPTION</p>		<p>WORKING WITH LOCAL REGIONS AND COMMUNITIES</p>

04.1

RESPECTING HUMAN RIGHTS

EXTRACT

FROM THE CODE OF ETHICS AND COMPLIANCE OF THE GROUPE ROULLIER

Respect for Human Rights

Human interest is the primary concern in all business development at Groupe Roullier. Complying with standards relating to the rights of individuals and labour rights in every country in which we operate is a priority.

Observing embargos and other international restrictions & measures

The Groupe adheres to all national and international regulations governing international exchange, including when they lead to embargoes or other trade restrictions. Groupe Roullier has implemented a procedure to control and validate transactions with countries and individuals affected by sanctions.

Human Rights are fundamental rights enjoyed by all individuals. Two main categories of Human Rights exist in tandem with one another: the first covers civil and political liberties (the right to be free, equality under the law, freedom of expression...), whilst the second involves economic, social and cultural rights (workers' rights, equality of opportunity, non-discrimination, abolition of child labour, the right to a better level of health, education and security...).

In any situation in which Human Rights are at risk, it is necessary to analyse the potential negative effects throughout the supply chain. This raises the need for increased vigilance in purchasing operations where goods or services may have been sourced from conflict zones or from areas which are either politically unstable and employing corrupt commercial practices, as well as failing to uphold civil rights or legal protections, or from areas in extreme poverty where child labour is a common practice.

Our ambitions

for all our purchasing operations:

Complying with standards relating to individual rights and labour rights in our procurement practices. Ensuring that our ethical compliance rules are applied and implementing a strict referencing procedure for the procurement of raw materials.



COMBATING FRAUD AND CORRUPTION

04.2

There are several types of corruption offences punishable under the French Penal Code.

The offence of active corruption is the fact of offering an undue advantage (money, gifts, services, donations, etc.) to an individual in order to encourage them to perform or abstain from performing an official duty.

Passive corruption is the fact of soliciting or accepting such undue advantage in order to perform or abstain from performing an official duty.

Private corruption occurs when the act of corruption involves employees in the private sector; corruption becomes public once the corrupt arrangement involves a public servant.

In France, peddling influence, misappropriation of funds, favouritism and conflict of interest are all examples of corruption offences.

Groupe Roullier has put tools in place in order to prevent, detect and manage the risk of corruption and connected criminal acts in order to combat any lack of probity.

Groupe Roullier has also implemented procedures to combat other types of fraud (monetary fraud, money laundering, embezzlement, receiving stolen goods, etc.).

Our ambitions

for all our purchasing operations:

In order to ensure the strict application of the standards for ethics and compliance that apply to all our Group employees, we provide regular training for purchasers. In addition, the Group has implemented an internal alert platform in order to flag practice or behaviour that fails to comply with applicable standards.



EXTRACT

FROM THE CODE OF ETHICS & COMPLIANCE OF THE GROUPE ROULLIER

Combating fraud and corruption

It is essential for all economic operators to understand and acknowledge the negative impact that fraud and corruption can have on the world of business. It is for this reason that Groupe Roullier applies a zero-tolerance policy to fraud and corruption.

04.3

FIGHTING TO PREVENT CLIMATE CHANGE

PRACTICES

IN PLACE AT GROUPE ROULLIER

Fighting to prevent climate change

Reducing CO₂ emissions: Ecogaz solution for the CAN, (Compagnie Armoricaïne de Navigation), the LOOP approach for Phosphea, using biomass as a primary energy source for the Group, optimisation of industrial processes for Magna, development of renewable energies, and a Group-wide voluntary carbon footprint assessment.

source: DPEF 2019 p.26 and 27



Climate change now affects every country and continent to different degrees. It has brought major repercussions for national economies and communities, and these are set to worsen as time goes on. These upheavals come in several forms: changes to seasonal weather patterns, damage to and loss of crops, rising mean temperatures and sea levels, disappearance of species and transformation of ecosystems, etc.

The implementation of the Paris Agreement is essential to the achievement of sustainable development goals and it includes a roadmap for action to help preserve the climate by reducing emissions and strengthening climate change resilience.

Our ambitions

for all our purchasing operations:

Working with our suppliers to mitigate the harmful effects of climate change caused by direct and indirect greenhouse gas emissions and setting ourselves the goal of achieving carbon neutrality.

PREVENTING POLLUTION

04.4

The precautionary approach to environmental issues involves undertaking initiatives that tend to make us more responsible in this domain, and to encourage the upgrading and propagation of technologies that respect our natural ecosystem.

Prevention can improve the Group's environmental performance by stopping the creation of forms of pollution such as airborne emissions, water pollution, waste and other identifiable forms of pollution such as noise, smell, vibrations, electromagnetic emissions, radiation and the spreading of viruses and bacteria.

Our ambitions

for all our purchasing operations:

Contributing to pollution reduction by working with our suppliers and during the supplier selection process.



PRACTICES

IN PLACE AT GROUPE ROULLIER

Reduction of dust emissions by TIMAC AGRO España (policy implemented across Group factories). LCA analysis of fertilisers at TIMAC AGRO Italia.

source: DPEF 2019 p.25 and 26



04.5

ENCOURAGING HONEST BUSINESS PRACTICES IN MARKETING AND INFORMATION EXCHANGE



PRACTICES IN PLACE AT GROUPE ROULLIER

Customer satisfaction is one of the key pillars of the Group's quality policy. TIMAC AGRO's sales force is in a close-knit relationship with its customers, having had specialist training about products and fertilisation by region.

source: DPEF 2019 p.46

Responsible marketing of products or services implies, among other aspects, the provision of information pertaining to their social, economic and environmental impacts throughout their entire life cycle and over the whole value chain. The details of the products and services provided by suppliers play an important role in purchasing decisions since this information may provide the only easily accessible data for customers and consumers.

This implies that suppliers:

- Do not engage in any practice that is deceitful, fallacious, fraudulent, dishonest, unclear or ambiguous, including the omission of key information.
- Agree to share relevant information in a transparent way, enabling the customer to easily access and make comparisons so that they can make an informed choice.
- Provide evidence of declarations or statements by producing, upon request, any associated facts and information.
- Supply clear and sufficient information regarding the price, characteristics, terms & conditions, costs, contract duration and cancellation period.

Our ambitions

for all our purchasing operations:

Ensuring that our suppliers provide us with information regarding the main social, economic and environmental impacts of their products or services, throughout the entire duration of their life cycle and over the whole value chain.

04.6

ENSURING THE HEALTH AND SAFETY OF CONSUMERS/USERS



PRACTICES IN PLACE AT GROUPE ROULLIER

A approvals process for materials, formalised and reinforced thanks to the RMES tool.

source: DPEF 2019 p.39

Protecting the health and safety of consumers means supplying products and services which are safe and do not pose an unacceptable level of risk when used or consumed in the way they are intended or when used in a foreseeably incorrect way. Clear instructions enabling the products to be used safely, including during assembly and maintenance, are also an important health and safety protection feature.

Our ambitions

for all our purchasing operations:

Working with our suppliers to ensure that our products can guarantee the health and safety of consumers/users, including by avoiding the purchase of goods or services that infringe upon intellectual property during their consumption, use, storage, maintenance, repair and return.

CONTRIBUTING TO IMPROVING WORKING CONDITIONS AND EMPLOYEES' HEALTH AND SAFETY

The field of health and safety at work strives to promote and maintain the highest levels of physical, mental and social well-being of workers, as well as the prevention of negative health effects linked to their working conditions. It also involves protecting workers from health hazards and adapting working environments to meet the physiological and psychological needs of the workers. Health and safety issues arise as a result of the dangers associated with equipment, processes, practices and substances (chemical, physical and biological).

Our ambitions

for all our purchasing operations:

Working with our suppliers to ensure that the working conditions, wellbeing, health and safety of our employees are guaranteed.

04.7



EXTRACT

FROM THE CODE OF
ETHICS & COMPLIANCE
OF THE GROUPE ROULLIER

Respecting the Health and Safety of people and the environment

All industrial and commercial activity is reflected in decisions made with potential repercussions for human health, society and the environment. Groupe Roullier is committed to taking responsible action, guaranteeing working conditions that respect human health and safety and minimising the environmental impact of its activities.

04.8

PRACTICES

IN PLACE AT GROUPE ROULLIER

New range of bio-stimulants integrating water stress by 2030
- Collaborative symposium of the CMI Roullier on the raw materials of tomorrow: integration of recycled material into fertilizers - Energy upcycling of wood waste by Weiss.

source: DPEF 2019 p.22, 23 and 25



FAVOURING AND ENCOURAGING SUSTAINABLE USE OF RESOURCES

Sustainable use of resources involves the improvement and responsible use of primary energy sources (renewable resources such as solar, wind, wave and geothermal energy) to promote greater energy security, as well as the conservation of water, use of and access to water (drinking water, re-use of water), efficient use of raw materials (re-use-recycling, circular economy, life-cycle approach) and the reduction of resource requirements for products and services.

Our ambitions

for all our purchasing operations:

Encouraging more virtuous environmental initiatives with our suppliers and other stakeholders in our supply chains. Adopting the principle of precaution and encouraging environmental responsibility. Eco-design and circular economy-based approaches will be given top priority.

PROMOTING RESPONSIBLE CONSUMPTION

04.9

Stimulating design of products and packaging which can be easily used, re-used, repaired or recycled and, where possible, offering or suggesting recycling and scrapping services. Providing consumers with information about goods or services such as their country of origin, energy efficiency (where applicable), contents or ingredients, and information connected with animal well-being. Making use of reliable and efficient labelling systems in order to communicate positive environmental aspects, energy yields and other characteristics of goods or services which are beneficial from a societal and environmental standpoint.

Our ambitions

for all our purchasing operations:

Raising consumer awareness of the sustainable use of products and services, and offering products with lower environmental impact.



PRACTICES

IN PLACE AT GROUPE ROULLIER

Contribution to the circular economy: integration of recycled materials at the heart of our plastics processing strategy - Certified sustainable packaging for Pâtisseries Gourmandes - Development of the EASYBIO range for Florendi.

source: DPEF 2019 p.25 and 26



WORKING WITH LOCAL REGIONS AND COMMUNITIES

04.10

PRACTICES

IN PLACE AT GROUPE ROULLIER

Investment in local regions: Pâtisseries Gourmandes is investing in its local region and prioritising local supply - The Group is strengthening its partnerships with schools and local associations - A sustainable sugar program certified by the UN implemented at TIMAC AGRO Italia - Establishment and monitoring of a code of best practice for sustainable agriculture in vulnerable regions by TIMAC AGRO.

source: DPEF 2019 p.44, 45 and 47

The term "community" refers to a geographical area in which there is a residential or any other human settlement in physical proximity to operational sites or areas impacted by our operations.

In these areas, any actions taken should always broaden the opportunities offered to local citizens, for example by more purchasing of local products or by building upon local resources to help support local development.

Our ambitions

for all our purchasing operations:

Giving priority to local suppliers of products or services, and helping to boost their development. Contributing to the development of local communities and regions alongside our suppliers.



05

OUR CODE OF CONDUCT

regarding our suppliers



Nourishing the earth and humankind in a sustainable way is about more than simply supplying environmentally friendly products:

**IT ALSO REQUIRES
THAT OUR BUSINESS PRACTICES
HELP ESTABLISH AND CONSOLIDATE
RELATIONSHIPS WITH OUR SUPPLIERS
BASED ON MUTUAL TRUST.**

Impartiality

Selecting suppliers during consultations based on identical and non-subjective criteria. Purchasers will never be involved in any contract in which they have a personal or financial interest.

Integrity

"Integrity leads to credibility"
Wayne Cheng

Neutrality

All forms of discrimination must be prohibited, whether they be of a social, religious, sexual, ethnic or political nature.

**Respecting the work
done by each individual**

In the spirit of constructive progress, keeping the commitments we have made and to this end knowing our limitations in order to avoid making promises we are unable to keep.

Confidentiality

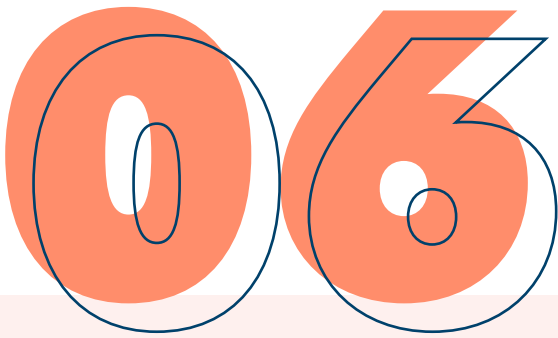
Respecting the confidentiality of information in one's possession, i.e. not divulging professional confidential information to which one has access to any third party or to persons employed within the company who are not authorized to be aware of them. This level of confidentiality may be validated by the management hierarchy.

Politeness

Being courteous facilitates social relations by enabling respectful, balanced dialogues to be had.

Respect for local customs and habits

Being conscious of the cultural differences of each country and company in order to keep the relationships between parties positive.



OUR SUSTAINABLE PURCHASING PROCEDURE

Our sustainable purchasing procedure is based on 6 phases, during which the dual participation of the purchaser-internal customer pairing is a key factor of success.

Following this procedure helps us achieve the objectives set by the Responsible Purchasing Policy: contributing to the overall business performance of the Group and its subsidiaries by creating sustainable value, building balanced relationships with our suppliers and developing innovative partnerships.

IDENTIFYING NEEDS

The identification of needs is a key step as the initial phase of the procedure. It should allow the need to be grasped in its entirety, to understand its objectives and final outcome within a sustainable development approach in order to ensure a successful purchase.

- Gathering descriptions of the need (technical/functional specifications, quality, scope, delivery timeframes, objectives, quality and cost).
- Challenging the need (understanding the key points in the description of the need).
- Evaluating risks and opportunities in terms of company responsibility (disability employment, using at-risk raw materials, local purchasing).

FORMULATING THE SPECIFICATIONS

Based on the needs defined and in consultation with the internal customer, we formulate the specifications. It's important to ensure this document is compiled in a precise and exhaustive manner so that the call for tenders is fluid and efficient.

- Defining our expectations (technical, quality, timeframes, CSR criteria).
- Specifying stakeholder contacts and remaining attentive to practical needs.
- Including timeframes and deadlines.
- Defining sustainable selection criteria.

SOURCING

A pivotal stage of the procedure, sourcing requires a steadfast approach to researching, comparing and identifying the panel of suppliers to be consulted. During this phase we will also define the rules governing the consultation.

- Analysing the market (macroeconomic data)
- Researching and pre-qualifying potential suppliers:
 - Market position
 - Risk analysis (dependency rate, default events, abuse of dominant position...)
 - Verification of the capacity to respond to the need
 - Integration of local suppliers
 - Soliciting companies from the adapted sector for the need when the purchasing segment allows for it
- Selecting the panel of suppliers to be consulted:
 - Consulting at least 3 suppliers
 - Integrating structures of various sizes (SMEs and bigger groups)
 - Prioritise territoriality

CONDUCTING THE CALL FOR TENDERS

At this point we launch the consultation and analyse offers received based on the criteria communicated during the previous phases, and negotiate with suppliers using a win-win mind.

- Sending out the specifications to the suppliers identified during the sourcing phase.
- Analysing offers based on the criteria defined and communicated to the suppliers.
- Meeting with the suppliers for negotiations.
- Integrating, as far as possible, the overall cost analysis (TCO) and product life cycle. (Be careful not to think only in terms of face value).
- Applying the principles of impartiality and neutrality when dealing with suppliers.
- Prioritising suppliers who can offer alternative, back up, innovative and sustainable solutions.
- Communicating with the suppliers selected and not selected following the call for tenders.

FORMALISING THE CONTRACT

The contract governs the workings of the contractual relationship and specifies the commitments made by each party.

- Re-stating in their entirety the terms of the negotiation and specifying the objectives and results expected.
- Consulting the legal department for advice and validation
- Defining assessment methodology (reporting, quality parameters, penalties).

BUILDING AND MAINTAINING SUSTAINABLE RELATIONSHIPS

Throughout the duration of the contract it's essential to dialogue with our suppliers regarding the criteria for success, areas for improvement and the achievement of objectives in order to perfect our procedures and gather new ideas for more responsible outcomes.

- Ensuring our mutual commitments are observed throughout the duration of the contract.
- Ensuring transparency in communications with the supplier.
- Evaluating suppliers based on the procedures defined in the contract.
- Anticipating and preventing supplier default.
- Encouraging joint initiatives.
- Preparing for the end of the contract (advance notice, launch of call for tenders).

If you have any questions,
please don't hesitate to contact your Purchasing team



GROWING
Together



www.roullier.com