



TOP ***Thin Oil Products***

PALM OIL AND NDPE SUSTAINABILITY POLICY -2017





Thin Oil Products, LLC (TOP LLC) markets high quality palm oil to Central America and Europe. We strive for operational excellence, a factor that keeps us ahead of the market and its needs. Aligned with this approach, we have defined a Sustainability Policy for Palm Oil and NPDE, which includes all the stakeholders, customers and suppliers, directing our principles, objectives and aspirations towards all activities related to the production and marketing of palm and palm kernel oils.

Palm oil is a product of global importance, which has unparalleled oil yield per hectare, with plantations providing livelihood for millions of people in tropical farming communities around the world. TOP LLC is convinced that palm oil is and will continue to be a protagonist in the food processing and related industries as the population continues to grow and its lipid consumption increases. TOP LLC is committed to keep supplying Palm Oil in a responsible way, minimizing the environmental impact, preserving the natural resources and the biodiversity of the planting areas.

TOP LLC's Sustainability Policy has been designed to support and guide our suppliers in a collaborative and transparent manner, applying these principles, and also following the applicable legal policies and requirements of each country.

TOP LLC is a member of RSPO since November 2011. We are highly committed to the Principles and Criteria (P&C's) for the Sustainable Production of Palm Oil and its associated RSPO certification schemes. In order to remain faithful to this policy we are unifying our social, labor and environmental policies of No deforestation, No planting in Peat soil and No exploitation NDPE.

OUR COMMITMENT:

- Comply with local laws and the rights of native communities.
- Comply with the International Labor Office (ILO) conventions on forced labor and discrimination.
- Comply with the international standards against bribery and corruption.
- Market Palm Oil with 100% traceability, maintaining a level of transparency and traceability through the mapping of the supply chain from plantations, to the mills and storage tanks.
- Protect areas of high conservation value (HCV) or high carbon stock (HCS - Peat Soils) areas.
- Comply with the US Department of Justice's code of ethics, specifically the Foreign Corrupt Practices Act of 1977 (FCPA), which prohibits the offering, promising, authorizing, procuring or receiving of clients, suppliers, public officials, or other business relationships or partners (either directly or through a third party), any pecuniary benefit or other improper benefit. Gifts and entertainment can be offered and received to strengthen business relationships only if they are of modest value.



We expect our suppliers and each part of our supply chain to work collaboratively in applying the above principles with the following considerations:

- Use of RSPO P&C's as a guide to HCV implementation
- No burning, in accordance with RSPO P&C (Article 5.5)
- No development on peat soil regardless of depth.
- Ensure adequate treatment of the pollutant waste generated in their processes.
- No hunting, logging or illegal fishing within plantations.
- Implement Health Safety Systems in the workplace to identify, control and prevent the risk factors, in anticipation to accidents and diseases.

All our suppliers must reflect the principles and foundations of TOP LLC with respect to:

- Work environment free of discrimination, according to the ILO Convention on Discrimination (C111), which prohibits discrimination in hiring with respect to gender, religion, race, descent, sexual orientation, marital status, age and disability.
- Compliance with the standards established in the working minimum age ILO's Convention (C138)
- Commitment to continuously improve the measurement and reduction of greenhouse gas emissions.
- Upholding the code of ethics established by the country of operations, specifically the Anti-Corruption standards, only invitations and promotional items of modest value are accepted to strengthen the relationships, which must be aligned with local policies, laws and business practices, applicable.
- Suppliers should not engage in unfair practices, or discuss, reach or perform with competitor's agreements or understandings that are prohibited or have anticompetitive effects or purposes.

TOP LLC will remain committed to help transforming the industry to ensure responsible and sustainable development of the supply chain, minimizing social and environmental impacts for our present and future generations.

Cordially,

A handwritten signature in blue ink, appearing to read "CC", with a long horizontal flourish extending to the right.

Carlos Corredor
PRESIDENT