

SOVENA GROUP – SUSTAINABLE PROCUREMENT POLICY

I. Introduction and context

Sovena Group's purpose is to accelerate the evolution of global food, strengthening its commitment to work in partnership with its suppliers towards the success, responsibility, and sustainability of the entire supply chain.

As a global agri-food group operating in the olive oil and vegetable oil sectors – production, marketing, and supply Sovena Group recognizes the importance of ensuring a responsible and resilient supply chain aligned with the principles of sustainable development. As one of the world's leading companies in its categories and a benchmark partner in the food industry, Sovena Group is in a position to introduce innovative solutions for the future of food by integrating sustainable procurement practices.

II. Scope of application

This Policy applies globally to all Sovena Group companies and all direct and indirect procurement, including raw materials, auxiliary materials, and services, covering the entire value chain. It applies to both direct (tier 1) and indirect (tier n) suppliers who subscribe to these principles and implement them within their organizations, ensuring full compliance throughout their supply chains.

III. Purpose, commitments, objectives, and targets

This Sustainable Procurement Policy aims to formalize Sovena Group's commitments to its suppliers by integrating quality and food safety, environmental, social, and governance (ESG) practices in the procurement of goods and services.

This document aligns with international frameworks, including: the Sustainable Development Goals ([SDG](#)); the principles of the United Nations Global Compact ([UNGC](#)); the Universal Declaration of Human Rights ([UDHR](#)); the [OECD Guidelines](#) for Multinational Enterprises on Responsible Business Conduct; [ISO 20400](#), among others. Additionally, it is consistent with Sovena Group's [Code of Ethics and Conduct](#), the [Supplier Code of Conduct](#), and complements other internal policies ([Human Rights Policy](#); [Quality and Food Safety Policy](#); [Environmental Policy](#); [Anti-Corruption Policy](#); [Conflicts of Interest Policy](#); [Donations, Offers, Gifts and Sponsorships Policy](#)).

The Policy sets out the following commitments, objectives, and targets:

- Ensure compliance with applicable laws and regulations (e.g. quality and food safety, tax, social, environmental, among others);
- Promote traceability and transparent sharing of relevant supply chain information, wherever feasible, to strengthen trust and accountability among stakeholders;
- Systematically integrate ESG criteria, as well as other critical factors (food safety, quality, service, production capacity), into supplier selection and evaluation, promoting sustainable and responsible practices across the supply chain and all purchasing decisions;
- Foster continuous improvement in ESG performance throughout the supply chain by identifying and assessing risks, prioritizing suppliers that implement best practices in environmental, social, and governance areas;
- Achieve specific sustainable supply chain targets: (i) Ensure that all our suppliers subscribe to this Sustainable Procurement Policy; (ii) By 2030, implement a supplier monitoring program covering 90% of key suppliers, based on ESG criteria; (iii) By 2026, promote annual sustainability events addressing key environmental, social, and governance topics, reaching over 400 participants per year.

IV. Guiding principles

The guiding principles of this Policy reflect Sovena Group's core values and commitments in its relationship with suppliers, ensuring that procurement practices align with high standards of quality, food safety, and environmental, social, and governance responsibility, aiming to identify, assess, and mitigate supply chain risks. They also reflect other non-negotiable values that have been part of Sovena Group's DNA since its foundation.

Create long-term value by pursuing continuous efficiency and ensuring financial soundness, without compromising on Food Safety, Quality, or Service.
Implement continuous improvement mechanisms that enhance the competitiveness of products or services and ensure their sustainable availability in the short and long term.
Ensure production capacity and provide all operational, functional, and logistical means necessary to meet appropriate service levels tailored to customer needs, considering industry specifics.
Develop internal control systems to maximize product and service quality and anticipate any deviations from contractual standards.
Explore and develop innovative processes, methodologies, and projects that bring – or have the potential to bring – added value and better respond to customer and consumer needs.
Promote fair commercial relationships that ensure economic efficiency and a quality-price balance, helping make final products accessible to a broader range of consumers without compromising on quality, environmental, social, or ethical standards.
Encourage resource efficiency, pollution prevention, biodiversity promotion, circular economy, and decarbonization.
Actively promote occupational health and safety, diversity and equity, employee well-being, and decent working conditions, including formal contracts and fair working hours.
Respect human rights and combat child labour, forced labour, and/or analogous conditions.
Uphold ethical principles, integrity, and transparency in procurement processes and commercial transactions.
Verify suppliers' financial stability and fiscal responsibility and promote local sourcing.
Establish accessible whistleblowing channels and protect whistleblowers from retaliation.
Implement all necessary internal procedures to promote and ensure dissemination, understanding, and compliance with the above principles across the value chain, especially among employees, subcontractors, suppliers, and other business partners.

V. Implementation

To meet the commitments and apply the principles defined in this Policy, Sovena Group integrates ESG criteria into supplier selection and evaluation tools and conducts due diligence and audits to several suppliers (e.g. critical ones) in line with European legislation. Sovena Group follows a risk-based due diligence approach, ensuring that suppliers with greater strategic relevance or operating in regions with high ESG risks undergo deeper and more regular analysis. Additionally, Sovena Group promotes training and awareness sessions for procurement teams and suppliers.

Sovena Group seeks to build ongoing collaborative relationships with its suppliers, encouraging the gradual adoption of good practices and facilitating access to capacity-building and improvement tools, as well as defining minimum mandatory criteria to be met by all suppliers, including environmental, social, ethical, and compliance aspects in line with the Sovena Group [Code of Ethics and Conduct](#).

VI. Compliance

Compliance with the principles of this Policy contributes to achieving Sovena Group’s strategic and business objectives, aligned with its mission, vision, and values. Sovena Group therefore requires its suppliers to recognize and adopt these principles and ensure their implementation throughout the supply chain. Adhering to and subscribing to this Policy is a prerequisite for establishing and maintaining a commercial relationship with Sovena Group. Any violation of this Policy entitles Sovena Group to suspend or terminate the commercial relationship.

To ensure effective implementation of this Policy, Sovena Group suppliers must:

Acknowledge and subscribe to this Sustainable Procurement Policy	Comply with and implement the Sovena Group Supplier Code of Conduct	Provide relevant information on traceability, ESG, and other practices when requested	Cooperate with audit processes and corrective action plans	Disseminate this Policy internally among their employees and, where applicable, to their suppliers
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Additionally, suppliers are required to comply with applicable environmental, labour, human rights, and tax regulations in the countries where they operate. Where local regulations are less stringent than the principles of this Policy, suppliers commit to adopting the necessary measures within a reasonable timeframe to comply with its principles.

VII. Governance model and responsibilities

Effective governance of this Policy requires a clear definition of roles and responsibilities, ensuring the participation of all relevant areas in its implementation, monitoring, and review. In this context, the Sourcing and Procurement departments are responsible for implementing the Policy; the Sustainability Department, together with the Central Quality Department, oversees and reports on performance; and the Sovena Group Sustainability Committee assesses risks and opportunities in the supply chain, supported by various departments.

The Policy was developed with input from several Sovena Group departments, including Procurement, Sustainability, Quality, People & Culture, Finance, and Legal, ensuring an integrated approach. Sovena Group values stable, long-term business relationships with suppliers who share its values, avoiding procurement practices that may create indirect risks, such as undue pressure on prices or deadlines.

VIII. Communication, reporting, and information handling mechanisms

To request information related to procurement issues, report incidents, report irregularities, or make suggestions and proposals for improvement related to this Policy, you can contact Sovena Group through corporate.quality@sovenagroup.com.

Sovena Group commits to treating all information received as confidential and to keeping the identity of whistleblowers protected. Contact details will be collected to allow for follow-up and communication regarding the reported matter. The cooperation of the whistleblower or other involved parties is essential for investigating and resolving the issue. Sovena Group strictly prohibits retaliation or discrimination against anyone reporting concerns or participating in investigations, ensuring confidentiality throughout the process.

IX. Review, update, and communication

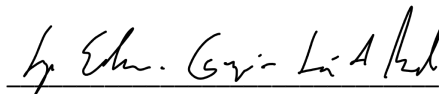
This Policy will be subject to regular review, continuous improvement, and updates, especially when required by legal, regulatory, or strategic changes, to ensure its relevance, compliance, and alignment with best practices.

Sovena Group ensures that all employees and stakeholders are aware of and understand this Policy through several activities (e.g., onboarding presentations, internal platform for employees, publication on the Sovena Group corporate website). The Policy will also be communicated to suppliers and partners at the time of signing new contracts or agreements. Sovena Group encourages its partners to share and promote this Policy and its principles among their employees and own suppliers.

X. Entry into force

This policy is effective as of this date and is mandatory for all suppliers, employees, and any individuals with responsibility in the Sovena Group.

On behalf of the Board of Directors,



May 2025