



Responsible Sourcing & Product Stewardship Standard

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SUMMARY

Tricon is committed to contributing to sustainable development as part of our business operations. We ask our business partners not just to comply with the law but to make decisions that are ethical and respectful of human rights in business being done with Tricon. The Responsible Sourcing & Product Stewardship Standard (“the Standard”) outlines the basic requirements we expect from those who provide us goods and services, as well as good practices we encourage business partners to implement. It also explains Tricon’s role in the process and our expectations for product stewardship across the value chain.

The document is divided into sections according to different business relationships:

- To read about Tricon’s commitments and general expectations, go to the [Introduction](#).
- If you supply or buy products related to our trading and distribution business (e.g. raw materials, chemicals, polymers) to/from Tricon, visit the [Expectations for Product Counterparties](#).
- If you are a good or service provider to Tricon, check our [Expectations for Suppliers](#). If you provide logistics services like warehousing and transportation, read through our [logistics section](#) as well.

If your organization is not currently meeting requirements but supports the principles, we will work with you to ensure the requirements are met in an agreed timeframe. We understand sustainability is a journey for all of us and invite business partners to collaborate with us on the path toward a more inclusive, net zero, and circular economy.



Introduction to the Responsible Sourcing & Product Stewardship Standard

PURPOSE

Tricon's Responsible Sourcing & Product Stewardship Standard ("the Standard") outlines our approach to value chain sustainability. It aims to help our suppliers and customers do business responsibly and develop good practice in ethical, environmental, and social topics.

This standard reflects our ambition to create positive social and environmental change beyond our own boundaries and contribute to a more just, inclusive, and environmentally sustainable society. We ask our suppliers and partners in the value chain to support this ambition.

SCOPE

The Standard applies to Tricon, its entities, and those we conduct business with. It is intended to provide expectations and guidance for business partners in the work they do with Tricon.

In certain jurisdictions, the expectations in this Standard may go beyond local regulation, as it is intended to serve as a global standard for social and environmental responsibility. In other cases, local regulation may be higher, and you should comply with that higher standard. The standard highlights "basic requirements" and "good practice." We recognize sustainability is a collaborative journey and take a view to continuous improvement.

RESPONSIBILITIES

Tricon's Responsibilities

Tricon employees are responsible for knowing and implementing this Standard and working through our business relationships to uphold the principles and obligations detailed here. The Chief Sustainability Officer and Chief Compliance Officer are responsible for updating and reviewing this guidance, in alignment with the Sustainability Committee, and supporting implementation with tools, resources, and training and capacity building.

Supplier's Responsibilities

Suppliers are responsible for understanding and working as appropriate to align with this standard, meeting basic requirements relevant to their company's operations. Suppliers are encouraged to implement good practice measures and improvements.

COMMITMENTS

Tricon's Responsible Sourcing Commitment

We are committed to purchasing materials and services from suppliers that operate responsibly and offer environmental or social benefits or smaller footprints. We ask suppliers, according to risk level, to complete self-assessment questions during the onboarding process, as part of our due diligence. Tricon will evaluate sustainability in supplier selection, aiming to provide preference to demonstrated sustainability performance and improvements, and competitively select suppliers without compromising the principles of this Standard.



Tricon's Product Stewardship Commitment

We believe in promoting sustainable product stewardship through industry and stakeholder collaboration and by leveraging our position in the value chain to create awareness and opportunity for more sustainable product production and use.

We comply with applicable environmental laws and regulation, including governance around the products we trade. Tricon only trades legal products and products that have a legitimate purpose in supporting people and the economy. We endeavor to gradually increase the environmental sustainability of the portfolio of products we trade.

Hazardous materials, chemicals, and dangerous substances must be safely stored, handled, recycled, reused, disposed, and reported per applicable regulations, such as the US Toxic Substances Control Act, ADN, and Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation). Product handling must protect the health and safety of people and the environment, meeting relevant quality specifications. This includes, where applicable, that Tricon provide a copy of the current safety data sheets to customers and logistics providers, in compliance with regulation. Tricon subscribes to CHEMTEL which provides world-wide around the clock support to questions about the products we trade.

Tricon's Commitment to Responsible Investments

Tricon may invest in capital goods, joint ventures, assets, and acquisitions. We will undertake environmental, social, and governance due diligence for these investments. Tricon aims to invest in ways that meaningfully improve economic, environmental, social, and governance results.

REPORTING ISSUES

Suppliers and business partners should report any issues or violations to Tricon Listens Helpline via our website. Tricon will investigate any concern raised.



Expectations for Tricon’s Suppliers

This section applies to all Tricon’s direct or Tier 1 suppliers, including agents, brokers, material providers, service providers, logistics providers, and other upstream supply chain relationships. Trading product suppliers should visit the Product Stewardship section.

Basic Requirements	Good Practice
ETHICS & COMPLIANCE	
General	
<ul style="list-style-type: none"> Comply with all applicable laws and regulations in the countries where they operate, including anti-bribery and anti-corruption laws; laws relating to international trade, including sanctions, export controls, and reporting obligations; data privacy and protection; and anti-trust and competition laws. 	<ul style="list-style-type: none"> Conduct regular training and communication campaigns to promote ethical conduct and awareness of the compliance programs.
<p>Anti-Corruption: Tricon has zero tolerance for any act of bribery or corruption. We do not improperly offer, give, or accept anything of value to obtain or retain business or for any other purpose. “Anything of value” should be viewed very broadly: cash, an expensive gift, the use of a beach house, and a job offer are all examples of “anything of value.”</p>	
<ul style="list-style-type: none"> Conduct business without bribery, corruption, or any type of fraudulent behavior. Providing and receiving courtesies such as gifts, meals, travel, or entertainment (“Hospitalities”) can be perfectly appropriate and a normal part of a business relationship. Suppliers should keep in mind, however, that the provision of Hospitalities can be corrupt or appear to be corrupt. When transacting Tricon-related business, suppliers may not offer, give or accept any Hospitalities that could compromise or raise doubts about the objectivity of the decision maker. 	<ul style="list-style-type: none"> Senior management are engaged in the ethics and compliance program and promote transparency and accountability with appropriate record keeping, traceability, and management systems.
Business and Financial Records	
<ul style="list-style-type: none"> Provide honest and accurate invoices. 	
Export Controls	
<ul style="list-style-type: none"> Follow all applicable and lawful export control laws. Where applicable, suppliers should not reexport Tricon products in a way that violates export control laws and sanctions. Evaluate any suspicious circumstance regarding controlled products, end-use, end-user, or ultimate country of destination. 	
Antitrust and Anti-Competitive Business Practices	
<ul style="list-style-type: none"> Antitrust/competition laws promote competition and protect consumers from anticompetitive practices. Some common examples of competition law violations include price-fixing, bid rigging, and market allocation. As it pertains to business with Tricon, Tricon suppliers must refrain from any of these practices if they violate applicable laws. 	
Conflicts of Interest	



<ul style="list-style-type: none"> • Declare any potential conflict of interest in any business dealings with Tricon, including any ownership or beneficial interest in a supplier’s business by a Tricon employee, agent, close family member, government official, or other potential conflict of interest. 	
Privacy and Data Security	
<ul style="list-style-type: none"> • When suppliers handle personally identifiable information on behalf of Tricon, our employees or customers, then they must contractually commit to apply privacy and information security safeguards. 	
WORKER WELFARE & HUMAN RIGHTS	
General: Tricon will not tolerate human rights abuses, human trafficking and/or slavery, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.	
<ul style="list-style-type: none"> • Respect human rights in communities of operation, guided by the UN Guiding Principles on Business and Human Rights, and the rights of workers, in accordance with the ILO core conventions and Declaration on Fundamental Principles and Rights at Work. 	
Ethical Recruitment	
<ul style="list-style-type: none"> • Recruitment practices must be ethical, legal, voluntary, and free from discrimination. This means that workers do not pay recruitment fees, and employment-related costs are covered by suppliers. • Provide workers clear terms of employment in a language understandable to the worker. 	<ul style="list-style-type: none"> • Promote diversity and inclusion in recruitment and pay particular attention to ensuring dignity, respect, and fairness for vulnerable workers, including short-term workers, women, migrants, interns, and other disadvantaged workers. • Limit use of recruitment agencies, labor brokers, and temporary and contract workers where feasible.
Fair Terms and Conditions of Work	
<ul style="list-style-type: none"> • Consistently uphold terms agreed in the contract and conditions that protect worker welfare. • Wages and benefits comply with local law, including overtime payment, are provided regularly and on time and not subject to unlawful pay deductions. All overtime is voluntary. • Provide working hours and rest hours (at least one day per seven days or two per fourteen days) in accordance with applicable ILO conventions. 	<ul style="list-style-type: none"> • Track hours worked and ensure routine working hours do not exceed 60 hours of week, including overtime. Overtime is not used to replace additional workers. • Assess compensation practices to ensure workers are paid a living wage and that compensation is fair with equal pay for equal work. • Recognition and promotion processes and practices are made based on worker performance, without discrimination.
Freedom from Child Labor	
<ul style="list-style-type: none"> • Suppliers shall not employ children under the age of 15. Where young workers are employed, they must not do work that is mentally, physically, socially, or morally dangerous or harmful or that interferes with their education. 	<ul style="list-style-type: none"> • Age verification processes are in place, along with systems to regularly monitor and prevent child labor. Internships and educational programs are conducted with appropriate wage or educational benefit compensation.
Freedom from Forced Labor, Modern Slavery, and Human Trafficking	



<ul style="list-style-type: none"> • Workers are employed voluntarily, free to change employers, and not forced, including under any threat or intimidation, to work outside of agreed terms. • Except for reasonable health and safety reasons, workers are free to leave supplier’s facilities and to access communications outside of normal working hours. • Not retain workers’ personal documents, such as passports, without the free consent of the worker and must provide workers with access to their documents in a reasonable timeframe upon request. • Not impose penalties for employment termination or provide loans with terms that could be construed as debt bondage or involuntary labor. • Provide for migrant workers to return home, where applicable, at the end of the contract, in extenuating circumstances, and/or upon reasonable notice by the worker. • Prison labor may only be used if truly voluntary, where prisoners participate in rehabilitation or training programs in preparation for release and where the terms and conditions of employment are similar to those in the local labor market. 	<ul style="list-style-type: none"> • Ensure all workers are provided with a copy of their contract, in a language they can understand, and conducts training with workers on their rights and welfare. • Conduct due diligence on any labor brokers or recruitment agencies used to prevent situations of forced labor • Train management on recognizing signs of forced labor.
Freedom from Harassment and Discrimination	
<ul style="list-style-type: none"> • Treat all workers with dignity, respect and fairness, without discrimination of any form. • Not subject workers to any form of harassment, including psychological, physical, verbal, intimidation, or sexual harassment or abuse. 	<ul style="list-style-type: none"> • Communicate anti-discrimination and anti-harassment policies to workers and provides training to management and workers. • Have in place mechanisms and criteria to promote objective decisions and prevent bias. • Assess data and performance and take actions to improve diversity, equity, and inclusion, such as providing accommodations and flexibility to support vulnerable workers and workers caring for children and dependents.
Health & Safety	
<ul style="list-style-type: none"> • Assess and manage health and safety risks and take appropriate steps to prevent work-related injuries and illnesses. • Ensure facilities are hygienic with adequate lighting, temperature, ventilation, sanitary facilities, drinking water, and food storage. • Housing provided by suppliers must comply with the IFC and EBRD Workers’ Accommodation guidance. • Provide workers with appropriate protective equipment, training, and safeguards to conduct their work safely. 	<ul style="list-style-type: none"> • Have effective policies and processes in place for occupational health and safety with regular risk assessments, a culture of continuous improvement, and ongoing training that is relevant to the worker’s role and associated risks. • Track and report health and safety near misses and incidents and analyze trends for improvements.



Worker Representation and Voice	
<ul style="list-style-type: none"> • Respect freedom of association and collective representation in accordance with applicable laws. • Not discriminate, intimidate, or penalize workers who exercise their right to join or not join an organization. Where these rights are restricted under local law, not hinder alternative means of independent and free association. 	<ul style="list-style-type: none"> • Have in place clear rules governing the activities of trade unions, in alignment with good industry practice. • In the absence of formal worker representation, encourage social dialogue and worker committees or bodies that allow workers to raise issues and promote their wellbeing.
Access to Grievance Mechanisms	
<ul style="list-style-type: none"> • Ensure all workers can express concerns and have in place a process that protects workers who express concerns in good faith from retaliation. 	<ul style="list-style-type: none"> • Have a fair, equitable, and transparent process to raising concerns with multiple channels available to workers, communicated in a culturally appropriate manner. • Investigate and resolve grievances in a timely manner. • Provide access to remedy, in accordance with applicable law.
ENVIRONMENTAL RESPONSIBILITY	
<ul style="list-style-type: none"> • Respect the environment in operations and have in place appropriate measures to identify and manage adverse environmental impacts and comply with all applicable environmental laws and regulations. • Maintain the appropriate environmental permits for the scope of work with Tricon and, as applicable to operations, have in place environmental management policies and processes to manage risks or potential impacts related to water, waste, energy, hazardous materials, air emissions, spill prevention and response, deforestation, or similar. 	<ul style="list-style-type: none"> • Integrate environmental considerations into business processes. • Conduct training on environmental responsibility and communicate to increase environmental awareness. • Have goals and targets to support sustainability. • Support Tricon’s aim to contribute to a circular and net zero economy: offering low carbon options, minimizing packaging waste, or demonstrating leadership on lifecycle and waste management (e.g. product design, take-back options, sustainable packaging, recycling).
SOCIAL RESPONSIBILITY IN COMMUNITIES	
<ul style="list-style-type: none"> • Conduct business responsibly in communities of operation, including respecting human rights in the community and the rights of Indigenous Peoples, in a manner consistent with the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights. 	<ul style="list-style-type: none"> • Identify and address negative impacts to communities, engage stakeholders responsibly and inclusively, and invest in economic, environmental, cultural, and/or social wellbeing. • Monitor how operations impact vulnerable groups and integrate into decision-making issues like environmental justice and social and economic inclusion.



SPECIFIC EXPECTATIONS FOR TRANSPORTATION AND LOGISTICS

Tricon contributes to sustainability through optimized logistics in the movement of traded products. In addition to the requirements and good practice outlined for Tier 1 suppliers, we look to our logistics partners to collaborate together with us and other stakeholders on sustainability.

All suppliers must notify Tricon in case of emergencies related to our products, such as significant spills, contamination or pollution with the potential to seriously harm health, safety, or environment, loss of containment of hazardous materials, or similar.

Road Transportation

Logistics providers engaged in road transportation, such as trucking freight, must ensure:

- Vehicles comply with local laws, are safe and road worthy, and properly maintained, including checks on breaks, lights, mirrors, engines, and tires.
- Vehicle loads respect load limits and have in place any required permits.
- Vehicles meet local emissions standards, fuel standards, and environmental regulation.
- Drivers have relevant licenses and are qualified to operate the vehicle.
- Drivers and any passengers wear seatbelts and have appropriate safety gear.
- Drivers are not under the influence of alcohol or illicit drugs and are not distracted by mobile phones or other devices while driving.

Suppliers should also consider use of low emissions vehicles, electric vehicles, clean fuels, route optimization, and other more sustainable transportation options.

Ocean Freight and Vessel Charters

Ship owners, vessel charters, ocean freight, and other relevant seafarer activities must comply with applicable IMO, ILO, and flag state regulation. This includes compliance with the labor, health and safety, and employment conditions of the Maritime Labour Convention (2006).

Suppliers must:

- Provide adequate working and living conditions agreed by the seafarer and ship-owner or representative
- Provide wage payment to workers at least monthly and in accordance with any applicable collective agreement
- Ensure maximum work hours and minimum rest times are in accordance with MLC 2006
- Cover costs of repatriation in case of expired employment agreement, reasonable employment termination, illness, injury, shipwreck, insolvency, sale of ship, conflict, or other similar reasons
- Ensure access to prompt medical care for seafarers when on board and in port and comply with the Neptune Declaration on Seafarer Wellbeing.
- Provide appropriate repatriation and crew relief to promote the health, safety, and wellbeing of seafarers



In addition to respecting the rights and welfare of seafarers, marine activities must comply with the International Convention for the Prevention of Pollution from Ships, or MARPOL, to prevent and minimize pollution from shipping. Suppliers should identify and address environmental impacts, including:

- Maintaining spill prevention and response plans
- Preventing the introduction of invasive species
- Reducing waste generation and single use plastics on board vessels
- Managing water and wastewater treatment and disposal
- Utilizing ultra low sulfur fuels, scrubbers, and other methods to reduce emissions

We encourage marine transport suppliers to contribute to the UN Sustainable Development Goal 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development. We also encourage our suppliers to align with the Sea Cargo Charter, Global Logistics Emissions Council (GLEC), or Clean Cargo initiative for assessing and disclosing climate impacts. We ask our suppliers to report their Carbon Intensity Indicator and will gradually introduce this figure into our supplier evaluation process. Suppliers and vessel owners are encouraged to consider low or zero emissions fuels, shore power at port, route optimization, and other methods to reduce emissions.

Tricon expects vessel owners to responsibly repurpose, recycle or dispose of vessels at the end of life, following good practice to avoid environmental contamination and adverse human rights impacts. The European Union provides a list of vetted shipyards that can be consulted for best practice or in compliance with the EU Ship Recycling Regulation.

Storage, Packaging, and Warehousing

Suppliers providing storage or packaging for traded products, such as terminals and warehouses, are expected to have good practices in place:

- Spill prevention and response plans
- Controls to limit fugitive or venting emissions
- Air pollution controls and efforts to minimize pollution
- Measures to avoid contamination of soil, groundwater, marine ecosystems, etc.
- Measures to avoid negative health impacts on workers and local communities

Storage facilities may also have impacts related to environmental justice, land use, rights of Indigenous Peoples, and biodiversity. Suppliers should ensure their facilities are designed, built, operated, and decommissioned with respect for human rights.

Where available, we ask our storage suppliers to provide carbon footprint data based on the throughput or area occupied by our products. We encourage suppliers providing us with packaging to support the New Plastics Economy Global Commitment or put in place similar goals to make packaging reusable, recyclable, biodegradable, or compostable.



Expectations for Product Counterparties (Trading)

We expect those we purchase products from and those who purchase products from us to:

- Respect people, the environment, communities, and human rights in producing products, processing products, and using products
- Uphold all ethics and compliance principles and laws, as detailed in the [supplier section](#)
- Maintain and, where applicable, provide the appropriate safety data sheets, regulatory documents, and traceability declarations
- Where applicable, disclose the origins of products supplied to Tricon
- Respect biodiversity, land use, and high conservation areas in the community
- Respect land and cultural rights of individuals, the local community, and Indigenous Peoples
- Ensure that “energy cropping” is not threatening the food security of the local community
- Use products properly, safely and responsibly and not for any illicit or illegitimate purposes or to fund adverse human rights impacts

We value relationships with businesses who proactively identify more sustainable methods and practices to produce, process, and use products and encourage companies we work with to take a lifecycle approach and consider responsible end use of products in linear models.

We also ask our business partners to join with us in contributing to a more circular economy, integrating the principles of eliminating waste and pollution, circulating products and materials, and regenerating nature, into their decision-making and processes. We are members of the Alliance to End Plastic Waste and invite our counterparties to join us in the ambition to end plastic waste in the environment.

ACCESS TO FINANCING

Tricon helps connect people and businesses to products they need. We regularly provide financing and credit to support our customers. All financial transactions must comply with Tricon’s ethics and compliance program. Credit should be used only for the intended purpose and should not contribute to adverse human rights impacts.



References and Resources

European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): <https://unece.org/about-adn>

IFC and EBRD Workers' Accommodation: Processes and Standards: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_workersaccommodation

IHRB's The Swiss Commodities Trading Industry – A Mapping Study: https://www.ihrb.org/uploads/reports/IHRB%2C_The_Swiss_Commodities_Trading_Sector_-_A_Mapping_Study%2C_Mar_2017.pdf

ILO's core conventions and Declaration on Fundamental Principles and Rights at Work: <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

International Convention for the Prevention of Pollution from Ships (MARPOL): [https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-\(MARPOL\).aspx](https://www.imo.org/en/About/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-(MARPOL).aspx)

IPIECA Company and Supply Chain Labour Rights Guidance: <https://www.ipieca.org/resources/good-practice/company-and-supply-chain-labour-rights-guidance/>

IPIECA Supply Chain Library of Questions and Resources: <https://www.ipieca.org/news/supply-chain-library/>

Maritime Labour Convention, 2006: <https://www.ilo.org/global/standards/maritime-labour-convention/lang--en/index.htm>

Neptune Declaration: <https://www.globalmaritimeforum.org/neptune-declaration/>

Oil Pollution Act 1990: [https://www.epa.gov/laws-regulations/summary-oil-pollution-act#:~:text=\(1990\),or%20unwilling%20to%20do%20so.](https://www.epa.gov/laws-regulations/summary-oil-pollution-act#:~:text=(1990),or%20unwilling%20to%20do%20so.)

Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation): <https://echa.europa.eu/regulations/clp/legislation>

The Commodity Trading Sector Guidance on Implementing the UN Guiding Principles on Business and Human Rights: https://www.seco.admin.ch/seco/en/home/Publikationen_Dienstleistungen/Publikationen_und_Formulare/Aussenwirtschafts/broschueren/Guidance_on_Implementing_the_UN_Guiding_Principles_on_Business_and_Human_Rights.html

United Nations Global Compact: <https://www.unglobalcompact.org/>

United Nations Guiding Principles on Business and Human Rights: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

Voluntary Principles on Security and Human Rights: <https://www.voluntaryprinciples.org/>