



LDC.

Louis Dreyfus Company

Human & Labor Rights Policy

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1. Purpose

As one of the world's leading merchandizers and processors of agricultural commodities, Louis Dreyfus Company (LDC) seeks to uphold the highest standards of integrity, business ethics and sustainability in our operations.

Guided by our company purpose, we strive to create fair and sustainable value in everything we do and to leverage our position as a global leader in our industry to encourage business and supply chain partners to do the same.

We are committed to ensure that all persons' human rights are respected, without distinction on any basis, including age, race, ethnicity, color, sex, gender identity, sexual orientation, language, religion, political or other opinion, national or social origin, property, or any other characteristic or circumstance.

We are committed to and guided by international standards such as the Core Conventions of the International Labour Organization, the Universal Declaration on Human Rights, the United Nations (UN) Declaration on the Rights of Indigenous Peoples, and guided by the OECD Guidelines for Multinational Enterprises, the Ten Principles of the UN Global Compact, and the UN Guiding Principles on Business and Human Rights, among other international guidelines and standards.

Accordingly, this Human and Labor Rights Policy sets out our commitment to ensure strict compliance with applicable laws, regulations and international standards, and to engage with relevant stakeholders to address causes of potential and actual adverse human rights impacts in our value chain.

2. Scope

This Policy applies to all LDC businesses, including subsidiaries where we hold full operational control. In the case of shared control, or minority participation, LDC representatives on the Board of these organizations will advocate for the adoption of this policy or similar principles in compliance with this policy.

The Human and Labor Rights Policy is complementary and mutually reinforcing to other LDC policies, such as our Global Supplier Code of Conduct, our Group Code of Conduct and our Safety, Health & Environment (SHE) Policy, which specify how we work within our own operations and with actors across our value chain to ensure human rights are respected. We also work with our supply chain on a commodity basis, as outlined in our Palm Sustainability Policy, Soy Sustainability Policy and Coffee Supplier Code of Conduct.

3. Governance

This Policy was approved by LDC's Chief Executive Officer. Our Corporate Sustainability Officer, reporting to the CEO is accountable for our human rights commitments and is supported by the Group Human and Labor Rights Lead who is responsible for the implementation of the human rights commitments.

LDC has a Sustainability Strategy Steering Committee that meets monthly to discuss any potential issues, take decisions, track efforts and review progress on key sustainability issues including human and labor rights. Once a year, this committee is fully dedicated to human and labor rights and joined by representatives from the ILO and UN OHCHR. In addition, LDC has a dedicated Technical Steering Committee as the operational forum in which human and labor rights issues and action plans are arbitrated with functions and platforms, driving compliance with the Policy.

This Policy is designed in a spirit of continuous improvement and collaboration with actors across our value chain. The principles in this Policy will be periodically reviewed and updated to reflect changes in standards, laws, regulations and LDC's ambitions.

4. Human Rights Commitments

LDC commits to respect all human rights recognized in the above-mentioned international standards. Below, we define our commitments to upholding specific human rights, although this is not an exhaustive list of human rights issues that may exist across our business operations and will be regularly reviewed.

4.1 No Forced Labor¹

1. Not to, under any circumstances, use or benefit in any way from forced or compulsory labor, including human trafficking and other forms of modern slavery, done involuntarily under the threat of any penalty, such as mental or physical intimidation, confinement, or restrictions on workers' freedom of movement, physical punishment, sexual abuse or other forms of violence, withholding of wages and debt bondage.
2. Not to retain any identity documents or other personal original documentation of any worker, and not to charge any recruitment fees or deposits as a condition of employment.

4.2 No Child Labor²

1. Respect the minimum age for employment set by governmental authorities, and thus not employ anyone under 15 years of age³ or under the age of completion of compulsory schooling, whichever is higher in the country of operations.
2. Respect the minimum age of 18 for hazardous work activities that by their nature or circumstances are likely to harm the health, safety or morals of children, such as work with dangerous machinery, equipment, and tools; work that involves manual handling or transport of heavy loads, work that exposes the person to hazardous substances, work for long hours during the night, among others.
3. Ensure that no children are subjected to the worst forms of child labor⁴, including slavery, trafficking, debt bondage, among others.

¹ ILO definition of [Forced Labour](#); ILO [indicators of Forced Labour](#); ILO Forced Labour [Convention, 1930 \(No. 29\)](#)

² ILO definition of [Child Labour](#)

³ 14 years in some exceptional cases as per Art 2. §4 of ILO [C138 - Minimum Age Convention](#)

⁴ ILO Worst Forms of Child Labour Convention, 1999 (No. 182)

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

4.3 Safe and Healthy Work Environment⁵

1. Ensure a safe and healthy work environment to prevent work-related injuries and diseases, as well as the protection and promotion of all workers (including permanent, temporary, seasonal and migrant workers)⁶. This includes providing easy access to potable drinking water, adequate lighting, temperature, ventilation and sanitation, including personal convenience facilities (e.g., toilets, changing rooms) at no cost to the workers. Wherever possible, support smallholder farmers to ensure the same standard on their farms.
2. Equip the workplace appropriately with personal protective equipment provided free of charge, to prevent accidents and injuries, paying particular attention to the most vulnerable workers (pregnant and breastfeeding women, people with disabilities, etc.).
3. Establish and maintain emergency prevention, preparedness and response arrangements, and ensure that all workers are trained on “Health & Safety”, including induction for new workers and regular refresher training courses.
4. Where accommodation is provided to workers, ensure a safe and healthy living environment with appropriate sanitary conditions, portable water, storage space, bathrooms and showers, and adequate heating and ventilation equipment.

4.4 Freedom of Association & Collective Bargaining⁷

1. Uphold workers’ right to freedom of association and collective bargaining, in accordance with applicable laws, regulations and international standards.
2. Ensure that employees and workers have the right to freely join and/or establish an organization of their choice, support the organizations to operate freely without any interference, and ensure non-discrimination of employees who choose to join a labor union and/or other representative associations.

4.5 Fair Wages

1. Ensure all workers are compensated in accordance with applicable labor laws, regulations and collective agreements, including minimum salary, overtime, work-related illness or injury coverage and other indirect compensation and benefits.
2. Pay wages at regular intervals and no less than monthly. In cases where partial payment of wages is in kind, the value of such allowances should be fair and reasonable⁸.
3. Ensure that the details of working conditions in the host location, including workers’ legal rights, nature of work, wages and benefits, charges or deductions for room and board, and duration of contract at the time of recruitment, are communicated clearly in a language understood by jobseekers.

⁵ Principles around safe and healthy work environment are already highlighted in LDC’s SHE policy: https://www ldc.com/wp-content/uploads/LDC_Committed_to_zero_v4.pdf

⁶ ILO definition of [occupational safety and health](#)

⁷ United National Global Compact definition of [Freedom of Association](#); ILO Conventions [C087 - Freedom of Association and Protection of the Right to Organise](#) and [C098 - Right to Organise and Collective Bargaining](#)

⁸ ILO conventions on [protecting wages](#)

4.6 Working Hours

1. Ensure that workers' working hours comply with local and/or international laws and any collective agreements, as applicable.
2. Ensure that regular working hours do not exceed 48 hours per week and 8 hours per day⁹, or less if provided by local laws and regulations, collective agreements or local industry conventions, with exceptions for specific jobs, if allowed by national law.
3. Provide adequate periods for rest and recuperation, including weekly rest and paid annual leave, as per local laws, regulations and collective bargaining agreements. Workers should have at least 1 day of rest per week.¹⁰
4. Permit overtime if voluntary and paid according to national laws.

4.7 Land Rights¹¹

1. Ensure the rights of all land rights holders and users are respected, and act in accordance with international standards when acquiring, developing or accessing land.
2. Conduct appropriate due diligence, including proactive, transparent and participatory engagement with land rights holders and users, to avoid infringing on their human rights.
3. Follow the principles of 'Free, Prior and Informed Consent' where indigenous peoples or other local communities with customary tenure systems are affected, acknowledging that land may have cultural and spiritual value.

4.8 Anti-Discrimination¹², Equality & Inclusion

1. Treat all workers equally and fairly, forbid any kind of harassment and prohibit discrimination with respect to any personal characteristics that are not related to merit or inherent job requirements¹³, such as sex, gender identity, sexual orientation, color, race, ethnicity, age, religion, social background, marital status, disability, health status, nationality or political opinion.
2. Provide equal hiring and employment opportunities and remuneration for work of equal value. Non-discrimination in employment means that employees are selected based on their ability to do the job and that there is no distinction, exclusion or preference made on other grounds¹⁴.
3. Promote diversity and gender equality, forbid gender-based violence and safeguard workers' rights, especially those applicable to health and safety in the work environment, and any employment decisions that could negatively affect their employment status to prevent them from marrying or becoming pregnant.

⁹ According to [ILO conventions on hours of work](#)

¹⁰ According to ILO convention on weekly rest

¹¹ [Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security \(fao.org\)](#)

¹² [ILO C111 - Discrimination \(Employment and Occupation\) Convention, 1958](#)

¹³ UN Global Compact on [non-discrimination in the workplace](#)

¹⁴ UN Global Compact on [non-discrimination in the workplace](#)

4.9 Community Engagement

1. Maintain an active and transparent dialogue with local communities, regarding actual and potential impacts of LDC's value chain.
2. Ensure local community interests are taken into consideration when making business decisions, to prevent hindrance to local community development.
3. Where possible, contribute to local community development through local job creation, infrastructure and other development activities identified as priorities through engagement with communities, which could include fostering and supporting initiatives that contribute to improving farmer income and reducing the living income gap.

5. Policy Implementation

5.1 Human Rights Due Diligence

To ensure that the commitments in this policy are adhered to, LDC is expanding its human rights due diligence program, following the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

5.2 Mitigation & Remediation

If an adverse impact is identified within LDC's value chain, LDC will provide for or cooperate in impact mitigation and remediation. If an impact cannot be immediately addressed, we will implement a corrective action plan. If the impact is due to actions by our suppliers or business partners, we will work with them to mitigate and remediate the impact.

5.3 Grievance Process

Our grievance channel – [EthicsPoint](#) – is available for employees and external stakeholders to report any concerns over possible conduct that may be unethical, non-compliant or otherwise inconsistent with LDC codes and policies. This channel is hosted by a third-party service provider and all reported concerns are treated confidentially and anonymously, following existing grievance resolution procedures.

5.4 Membership Organizations

To increase LDC's ability to promote respect for human rights, we collaborate with other actors in the public and private sectors, taking part in several multi-stakeholder initiatives and membership groups.

We are members of the World Business Council for Sustainable Development, the Sustainable Agriculture Initiative Platform and the ILO Child Labour Platform, and signatories of the UN Global Compact.

To address industry-specific human rights risks and impacts, we are also part of several multi-stakeholder membership groups covering our key commodities, including:

- Coffee (Global Coffee Platform, Sustainable Coffee Challenge and International Coffee Organization);
- Cotton (Cotton made in Africa, Better Cotton and U.S. Cotton Trust Protocol);
- Palm (Palm Oil Collaboration Group and Roundtable on Sustainable Palm Oil);
- Soy (Round Table on Responsible Soy Association and Visión Sectorial del Gran Chaco Argentino); and
- Sugar (Bonsucro).

6. Communication

6.1 Internal Communication

This Policy will be communicated to our internal employees, and training will be provided to employees of functions most relevant to the protection of human and labor rights, to increase awareness of and ensure compliance with this Policy.

6.2 External Communication

This Policy is made public via the [Governance page](#) of LDC's website, and we will continue to report publicly on our human rights performance through our annual reports.

We will also ensure that our suppliers and business partners are aware of and understand this Policy. This will be done through regular engagement with our suppliers, alongside training for priority suppliers.

LDC offers public channels for stakeholders to report potential non-compliance with this Policy, such as [LDC EthicsPoint](#) hosted by a third-party service provider. Stakeholders can choose to report their concerns anonymously and all reports will be treated confidentially. All grievances will be resolved following existing grievance resolution procedures.

LDC does not tolerate retaliation against anyone who, in good faith, raises a concern or participates in a non-compliance investigation.