



growingforthefuture
 people environment
 community partners

Definitions of Sustainable Development

“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs”

– World Commission on Environment and Development

The UN in 1992, through the “[Declaration of Rio on Environment and Development](#)”, recognized that sustainable development was a balance of three dimensions:

- Environmental Protection
- Economic Growth
- Social Development

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Introduction

Our Mission

As the global population grows, and the resultant pressures on the planet's existing resources increase, we as a company need to work towards common global sustainability targets. This will ensure that our increasing participation in the flows of agricultural commodities around the world helps to preserve land and resources for future generations, and enhances the lives of the communities in which we operate.

The publication of the LDC Code of Conduct, and its numerous references to sustainability themes, illustrated our corporate commitment on this topic. The subsequent signing of the UN Global Compact by our Chairman and CEO acknowledged externally our ambition and intent in this regard. Similarly, the publication and release of our Corporate Statement on Sustainability served as an introduction and precursor to the publication of this Policy, which now follows.

The LDC Sustainable Development Policy has been designed across four specific pillars.

People – Our wide and diversified asset footprint, including our involvement in labor-intensive agricultural activities, requires us to embrace certain human resource challenges. We will protect all people involved in our value chain in terms of human and labor rights, and invest in human resources through training and adapted employee development programs.

Environment - As a company experiencing rapid change, and producing and trading agricultural products to help feed and clothe up to 450 million people worldwide, environmental concerns are at the core of our operational methods and business model. We will ensure that our operations maintain compliance with all applicable laws and regulations, and that they have the smallest possible environmental impact. We will target continuous improvement across a range of established environmental criteria. We must adapt solutions to challenges related to the diversity of our presence and of our activities around the world.

Partners - Sustainability is a key concern for our numerous business partners. We will actively participate, in partnership with all stakeholders, in the creation of sustainable value chains and the promotion of product safety in all commodities. We will also endeavour to build long-lasting relationships in order to be considered a first choice partner by customers, clients and financial institutions.

Community - Our various operations bring us into close contact with the communities in which we operate all over the world. We will continue to support and invest in development programs and initiatives in these communities, and ensure our operations and actions enable those communities to continue to develop. Regional priorities should be defined to correspond to local needs, and global priorities developed along the themes of food, agriculture and children.

Objectives

LDC Sustainable Development Policy has as its main objectives;

- 1) *To align and set sustainability targets for the LDC Group*
- 2) *To identify and disseminate best practices and expertise across our various platforms and regions*
- 3) *To establish a common sustainability performance management mechanism that targets continuous improvement*
- 4) *To maintain a formal internal and external sustainability reporting schedule.*

For each pillar of the policy, we will;

- 1) *Detail in the form of **Requirements** (either **Legal** or **Business**) why policy has been written*
- 2) *Refer to the relevant section from the **Code of Conduct***

For each of the themes covered under our Sustainable Development Policy, we will;

- 1) *Set clear **objectives** our policy must cover*
- 2) *Provide an internationally acknowledged **definition** of the theme*
- 3) *Lay out the **scope** of policy for each theme*
- 4) *Set clear **ownership and responsibility** for the policy within the LDC Group*
- 5) *Provide a clear and detailed **description of policy** related to each theme*

Overview

		Objective	Scope	Ownership	Internal References
People	Safety & Health	Zero fatalities and minimize the occurrences of serious accidents, with the ultimate target of creating an accident-free environment for all our employees	All LDC employees + Contractors/third party workers* operating on LDC facilities/premises	Industrial/logistical and agricultural units Plant/Farm/SHE Managers Offices Regional SHE Managers, together with Country Managers/Regional CEOs	"SH" elements of SHE Management System and the LDC safety, health & environmental (SH&E) policy
	Employee Development	Become "best in class" in employee development (e.g. training and education)	All LDC employees	Regional HR Department	Regional training and development policy**
	Discrimination	Promote discrimination-free work environment	All LDC employees + Recruitment process	Global and Regional HR Department	Regional or Local discrimination-free work environment policy**
	Forced/Compulsory/Child Labor	Ensure that LDC and our partners are not involved in any activity involving forced, compulsory, or child labor	All LDC employees + Contractors/third party workers* operating on LDC facilities/premises + All LDC operations in the value chain where LDC is directly or indirectly involved	Regional HR Department for LDC employees & contractors/third party workers* Platform Heads for ensuring that signed contracts are in place with all counterparts incorporating the LDC Human Rights clause	LDC Human Rights Clause**
Environment	Environmental Footprint	Continuous improvement of our performance, including an action plan to reduce LDC's environmental footprint	All LDC assets whether industrial, logistical, agricultural, or office-based	Industrial/logistical and agricultural units Plant/Farm/SHE Managers Offices Regional SHE Managers, together with Country Managers/Regional CEOs	"E" elements of SHE Management System and the LDC safety, health & environmental (SH&E) policy
	Biodiversity	Comply with national and/or subscribed international conventions and relevant organizations' principles and criteria	All LDC operations in the value chain where LDC is directly or indirectly involved	Country Manager/Regional CEO	
Partners	Business Compliance	LDC considered as the first choice partner by third parties***, by being compliant with business-driven expectations	All LDC operations in the value chain where LDC is directly or indirectly involved	Platform Head	
	External Communication	Consistent communication on LDC's sustainability profile and protection of LDC's reputation at all levels of our operations	All LDC employees	Regional CEO	
	Participation in Sustainability-related Organizations	Active participation in sustainability-related organizations when appropriate	All LDC operations in the value chain where LDC is directly involved	Platform Head or Sustainability Committee	
	Participation in Fair Trade-type Programs	Active participation in fair trade programs when appropriate	All LDC operations in the value chain where LDC is directly involved	Platform Head or Sustainability Committee	
Community	Business-related Community Programs	Assist economic development and improve quality of life of communities connected to our industrial and agricultural operations	All community related programs undertaken at or by LDC-owned or operated assets	Regional Sustainability Committee, to be nominated by the regional CEO	Regional Sustainability Policy & Themes**
	Benevolent Community Programs	Investing in programmes linked to the themes of agriculture, food, and children	All community related programs with no immediate link to communities around LDC asset	Sustainability Committee	Global Sustainability Themes

*e.g. workers hired through agents, employees of civil work companies in our plants etc

**Still to be defined and implemented

***i.e. customers, suppliers, financial institutions



Requirements

Legal requirements

LDC respects the government law of countries/communities in which the company operates.

Moreover, LDC should be compliant with relevant labor conventions, including international standards defined by the International Labor Conventions (ILO).

Business requirements

The Company's most valuable assets are its employees. It is in the company's interest to protect and develop people working for LDC, including our seasonal workers.

Moreover, LDC is signing contractual obligations that no child or forced labor is present in the value chain, including our own employees and those of our suppliers. Audited proof is required starting 2011 for some commodities and markets, and it is likely that this requirement will spread to other business areas.

Code of Conduct

Work environment

The Group strives to build the most appropriate work environment so that employees may realize their full professional potential in the interest of their future career within the Group as well as in the best interest of the Group and Group Companies. Discrimination including based on sex, race, origin, religion, age or beliefs, is in contradiction with our values, history, culture and economical interest, and should not be accepted.

We aim at creating a safe and healthy work environment for our employees and for third parties invited to access our premises.

Community and environment

Sustainable growth is a central issue for each of us and our families, it is also critical to our long term economic interests.

We strongly condemn child or forced labor and pro-actively apply the UN recommendations in this respect. We promote relations with providers, business partners and sub-contractors operating under the same values.

I. Safety and Health

Objective

To ensure that LDC maintains compliance with all applicable legal requirements, and takes a global approach to managing employees' Safety & Health, and in the implementation of the SHE Management System.

To target zero fatalities and to minimize the occurrence of serious accidents at all the Company's facilities, with the ultimate target of creating an accident-free environment for all our employees.

Definition

Occupational health involves the promotion and maintenance of the highest degree of physical, mental and social well-being of workers in all occupations by preventing departures from health, controlling risks, and the adaptation of work to people and people to their jobs.

Scope

Policy applies to all LDC employees and contractors/third party workers (e.g. workers hired through agents, employees of civil work companies in our plants etc) operating on LDC facilities/premises

Ownership

Safety and Health within LDC is the responsibility of all employees. The top priority in company plants and offices is to prevent the occurrence of accidents and injuries. All employees also have the responsibility to protect themselves and others from injuries by;

- understanding the hazards and risks associated with their jobs
- complying with all applicable safety rules and procedures
- knowing how to safely operate equipment and facilities
- actively participating in training and education opportunities

Industrial/logistical and agricultural units

Plant or Farm Managers, SHE Managers in industrial/logistical/agricultural units are responsible for ensuring consistent implementation and maintenance of the Safety and Health elements of SHE policy, and for ensuring all employees are adequately trained and equipped to follow this policy.

Offices

Regional SHE Managers, together with Country Managers/Regional CEOs are responsible for:

- defining the Safety and Health improvement plan, and the goals for LDC offices
- communicating policy, procedures and results to all employees.

Description of policy

LDC is committed to providing a healthy and safe working environment for all our employees, contractors and visitors. LDC should in all practical circumstances be as free as possible from known and hidden dangers or hazards of work. It is LDC policy to comply with all applicable legal statutes and regulations, and to adopt the best practices in health and safety in our workplace.

Refer to “SH” element of SHE Management System and the [LDC Safety, Health & Environmental \(SHE\) policy](#).

II. Employee Development

Objective

To target to become “best in class” in employee development (e.g. training and education) requiring to have in place for all employees;

- Annual performance and development review process.
- Training and education program available.

Definition

Training and development program

Training programs involve a process of providing knowledge, skills and abilities specific to a particular task or job; training programs can be developed and provided internally as well as externally, including by offering educational leave to the employees.

Development programs have a longer-term focus on preparing an employee for future responsibilities while increasing the capacities of employees to perform their current jobs.

Regular performance and Career development review

Performance targets and reviews are based on criteria known to the employee and his/her superior. This review is undertaken with the knowledge of the employee at least once per year. It can include an evaluation by the employee’s direct superior, peers, or a wider range of employees. The review may also involve personnel from the human resources department. (GRI – LA12)

Scope

Policy applies to all LDC employees, regardless of work contract length or terms;

- Full-time, part-time
- Permanent, seasonal, temporary

Ownership

Training and development program

The Regional Human Resources Department is responsible for defining the training and development policy.

Regular performance and Career development review

The Global Human Resources Department provides guidelines for the procedure and content of the annual performance and development review process.

Regional and/or Local Human Resources Departments are responsible for implementing the procedure and ensuring that all employees have at least one performance and development review per year.

Description of policy

Training and development

Policy will be designed by the Regional Human Resources Department.

The Global Human Resources guidelines are that training and development needs should initially be assessed and training and development annual plan and budget should be produced and implemented.

Performance and Career development review

All LDC employees have a least one full performance and development review performed per year. The format and content of the review is defined at a global level so that every employee can be reviewed according to the same criteria, which include both quantitative and qualitative elements.

Reviews are prepared by both the employee and the direct Manager, and an individual meeting takes place to discuss and formalise together all items of the review. Reviews provide the opportunity for the employees to express their training and career development expectations. All employee reviews must be discussed and verified by two managers.

Regional and/or Local Human Resources Departments are in charge of any follow up and/or implementation on individual training needs and/or career expectations expressed during the annual reviews.

III. Discrimination

Objective

To target to ensure LDC promotes a discrimination-free work environment.

Definition

Discrimination

The act and the result of treating a person unequally by imposing unequal burdens or denying benefits rather than treating the person fairly on the basis of individual merit. Discrimination can also include harassment, defined as a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed. (GRI – HR4)

Scope

Policy applies to all LDC employees, regardless of work contract length or terms;

- Full-time, part-time
- Permanent, seasonal, temporary

Policy also applies to recruitment process.

Ownership

The Regional Human Resources Department is responsible for developing relevant policies per region/country, in accordance with LDC's status as an equal opportunity employer.

Description of policy

LDC provides equal opportunity employment to all without regard to race, colour, religion, national origin, ancestry, gender, sexual orientation, marital status, age, disability or any other class protected by law in a particular country.

Regional and/or Local Human Resources departments will define and implement (where not yet formally in place) a discrimination-free work environment policy.

Breach of policy

Incident should be reported to Global Sustainability Manager and included in the risk map under "reputation exposure" type of risk.

IV. Forced/Compulsory/Child Labor

Objective

To target to ensure that LDC and our partners are not involved in any activity involving forced, compulsory, or child labor.

Definition

Forced or compulsory labor

All work and service which is exacted from any person under the menace of any penalty and for which the said person has not offered her/himself voluntarily (ILO Convention 29, Forced Labor Convention, 1930). The most extreme examples are slave labor, prison labor, and bonded labor, but debts can also be used as a means of maintaining workers in a state of forced labor. Withholding identity papers, requiring compulsory deposits, or compelling workers, under threat of firing, to work extra hours to which they have not previously agreed, are all examples of forced labor. (GRI – HR7)

Child labor

This term applies to all persons under the age of 15 years or under the age of completion of compulsory schooling (whichever is higher), except in certain countries where economies and educational facilities are insufficiently developed and a minimum age of 14 years might apply.

These countries of exception are specified by the ILO in response to special application by the country concerned and consultation with representative organizations of employers and workers.

Note: ILO Convention 138 refers to both child labor and young workers. See below for the definition of 'young worker'. (GRI – HR6)

According to ILO Convention 138 :

1. The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years.
2. The types of employment or work to which paragraph 1 of this Article applies shall be determined by national laws or regulations or by the competent authority, after consultation with the organisations of employers and workers concerned, where such exist.

Scope

Policy applies to all LDC employees and contractors/third party workers operating at LDC facilities/premises, including workers hired through agents and employees of civil work companies at our plants.

Policy also applies to all operations in the value chain where LDC is involved and LDC has indirect exposure in case its suppliers are not compliant with human rights, e.g. forced/compulsory/child labor.

Ownership

Local Human Resources Departments or Country Manager/Regional CEO (in the absence of a dedicated Human Resource Department) is responsible for making sure that LDC employees and contractors/third party workers operating at LDC facilities/premises are not working under conditions defined as forced/compulsory/child labor.

Platform Heads are responsible for ensuring that signed contracts are in place with all suppliers incorporating the LDC Human Rights clause.

Description of policy

LDC operations

1. Ensure no child labor :

Ensure that the collection and maintenance of all relevant employee documentation as required by local regulations when engaging a new employee is conducted. Such documentation must include some form of official personal identification and, where required, a valid work permit.

2. Ensure no forced or compulsory labor :

Ensure that all workers are employed within local rules and regulations, including appropriate contractual documentation, payment of wages and/or salary terms and conditions.

LDC suppliers – contractual engagement

Ensure all our contracts include the LDC Human Rights clause

Breach of policy

LDC operations

Incident should be reported to Country Manager/Regional CEO, as well as the direct manager for analysis; remediation plan should be defined, implemented and impact measured.

Incident should be reported to Global Sustainability Manager and included in the risk map under “legal requirement” type of risk.

LDC suppliers – contractual engagement

In case a counterpart refuses to sign the clause,

- a. Traders/Desk Head should ascertain reason for refusal
- b. Global Sustainability Manager and Global Head of Risk should be informed and subsequent discussion to decide on action plan

Incident should be reported to Global Sustainability Manager and included in the risk map under “legal requirement” type of risk.



Requirements

Legal requirements

LDC is committed to protecting the environment by maintaining compliance with all applicable legal requirements, and operating in an environmentally sustainable manner. LDC is present in many countries where environmental licences need to be approved and issued by appropriate authorities before the company is authorized to operate. When no formal licence is required, LDC will comply with applicable local environmental law.

Moreover, LDC should be compliant with subscribed environmental conventions.

Business requirements

LDC currently faces some environment-related requirements and targets. For example, some Platforms will be required to provide audited Green House Gas (GHG) emission calculations for their entire product value chain, starting in January 2011.

In some countries where environmental legislation is not that stringent, markets can require confirmation of LDC's environmental footprint as measured by external consulting/auditing companies.

LDC is also increasingly subject to NGOs' and other organizations' expectations in terms of biodiversity conservation.

Code of Conduct

Community and Environment

Sustainable growth is a central issue for each of us and our families, it is also critical to our long term economic interests:

We are committed to environmental responsibility and comply pro-actively with relevant legal and regulatory requirements.

I. Environmental Footprint of LDC

Objective

Effective management of our environmental responsibilities is integral to LDC's success. The LDC Environmental Management System will complement our larger SHE Program, and overall business management system. It will be used to manage the environmental aspects of our activities, products, and services, and establish objectives to improve our environmental performance. The target is continuous improvement of our performance, including an action plan to reduce LDC's environmental footprint.

Definition

Environmental Elements included in our SHE Management System will address:

- Evaluation of Environmental Aspects and Impacts
- Legal and Other Requirements
- Measurement, Monitoring and Management
- Waste Management and Sustainability.

Environmental Monitoring and Management shall cover GHG emissions*, energy consumption, water usage and all forms of emissions and waste management.

*GHG emissions include as a minimum:

- Carbon dioxide, methane, and nitrous oxide for assets
- Carbon dioxide for offices

Scope

The addition of the environmental components to the SHE Management System will complete the SHE disciplines, improve compliance rates, reduce emission levels and generation of waste, and begin the process of environmental performance measurement and continuous improvement.

By implementing these practices, we can reduce the negative environmental impact of our operations, including transportation, and increase the positive. Through measurement and review, we will assess our overall environmental performance and establish goals for environmental performance and continuous improvement.

The LDC Environmental Management System (EMS) applies to all LDC assets whether industrial, logistical, agricultural, or office-based.

Ownership

Industrial/logistical and agricultural units

Plant or Farm Managers, SHE Managers in industrial/logistical/agricultural units are responsible for ensuring the consistent implementation of the elements of LDC EMS.

Offices

Regional SHE Managers, together with Country Managers/Regional CEOs are responsible for:

- identifying all environmental aspects and impacts of our office operations
- defining environmental footprint improvement plan in each office
- communicating to all employees about policy, practices, and results

Description of policy

Refer to “E” element of SHE Management System and the [LDC Safety, Health & Environmental \(SHE\) policy](#).

II. Biodiversity

Objective

LDC targets to be fully compliant with national and/or subscribed international conventions regarding biodiversity conservation, as well as follow relevant organizations’ principles and criteria regarding biodiversity issues where applicable.

Definition

Protected area

A geographically defined area that is designated, regulated, or managed to achieve specific conservation objectives. *(GRI – EN11)*

Areas of high biodiversity value

Areas not subject to legal protection but recognized for important biodiversity features by a number of governmental and non-governmental organizations. These include habitats that are a priority for conservation (often defined in National Biodiversity Strategies and Action Plans prepared under the Convention on Biological Diversity). In addition, several international conservation organizations have identified particular areas of high biodiversity value. *(GRI – EN11)*

Scope

Policy applies to all LDC operations.

Policy also applies to all operations in the value chain where LDC is involved and LDC has indirect exposure in case its suppliers are not compliant with national and/or subscribed international conventions regarding biodiversity conservation.

Ownership

Country Manager/Regional CEO is responsible for making sure LDC operations are compliant.

Description of policy

1. LDC agricultural operations should be committed to preserve protected areas/high biodiversity areas, and at all times be compliant with national and/or international legislation related to the same.
2. LDC origination businesses should be proactive in supplier selection regarding biodiversity conservation, observing any official black list if available, and seeking assurances from suppliers regarding their land use management programs.

Breach of policy

1. Incident should be reported to Global Head of Risk and the direct manager for analysis; remediation plan should be defined, implemented and impact measured.
2. Incident should be reported to Global Sustainability Manager and included in the risk map under "legal requirement" type of risk.



Requirements

Legal requirements

LDC is signing contracts to govern relationships with customers, suppliers and financial institutions.

Business requirements

LDC has signed the UN Global Compact and is engaged to include the 10 principles related to human rights, labor, the environment and anti-corruption into our business strategy and relations with third parties.

LDC faces sustainability-related requirements/targets where the risk can be:

- (1) loss of business, loss of licence to operate, loss of or increased cost of financing
- (2) damage to LDC image as “first choice partner”
- (3) inconsistent information disclosed about LDC sustainability programs

Code of Conduct

Company representation

The only persons with the authority to legally represent any Group Company are those expressly granted such power by applicable law or by relevant powers of attorney complying with Group policies.

Employees are prohibited from disclosing any Group and Group Company related information to the media without the prior approval of the Regional CEO.

I. Business Compliance

Objective

To ensure that LDC is considered the first choice partner by third parties (i.e. customers, suppliers, financial institutions), by being compliant with business-driven expectations, including being committed to food safety and security.

Definition

This section covers relationships with third parties with whom LDC has signed a binding legal document. Therefore, there is a risk of loss of business, loss of licence to operate, or loss of or increased cost of financing in case of non compliance.

“Legal document” can be anything binding for LDC in the form of purchase/sales contracts, service agreements, third party social responsibility codes, certification programs, and/or audit conditions.

This section does not cover the insurance process included in our operations with counterparts. For that, please refer to [Insurance Policy 2008](#). (p22-31)

Scope

Policy applies to all LDC operations, as well as the overall value chain of LDC.

Ownership

Platform Heads are responsible for getting Regional CLO’s approval of any legal documents engaging LDC or the counterpart to meet sustainability-related requirements.

Platform Heads are responsible for ensuring LDC meets business expectations (i.e. anticipate needs, appoint owner, build action plan and implement).

Description of policy

Contracting with third parties about sustainability elements should be:

- reported to Global Sustainability Manager
- consistent with LDC Sustainable Development Policy
- authorised by Platform Head
- validated by Regional CLO

Breach of policy

1. Incident should be reported to Regional Chief Legal Officer and the direct manager for analysis; remediation plan should be defined, implemented and impact measured.
 2. Incident should be reported to Global Sustainability Manager and included in the risk map under “business requirement” type of risk.
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II. External Communication

Objective

To consistently convey LDC's sustainability profile to relevant and approved third parties that includes the programs and targets embedded in LDC policy, and to protect LDC's reputation at all levels of our operations.

Definition

This section covers any sustainability-related information request coming from customers, suppliers, financial institutions, NGO's, media or other organizations.

This section does not cover those relationships with third parties with whom LDC has signed a binding legal document. Therefore, it covers those cases where there is no risk of loss of business, loss of licence to operate, or loss of or increased cost of financing in case of non compliance. These risks are covered in previous section: "Business compliance".

Scope

Policy applies to all LDC employees.

Ownership

Each regional CEO is in charge of external communication, including sustainability issues.

Description of policy

1. Consistency of information shall be guaranteed by Global Sustainability Manager, who should be systematically informed and included in discussions with third parties.
 2. For information that has never before been disclosed externally, Sustainability Committee should give specific authorization.
 3. Reputation exposure should be systematically reported to Global Sustainability Manager and included in risk map, regardless of the impact of information disclosed (local / regional / global).
-

III. Participation in Sustainability-related Organizations

Objective

To ensure that LDC is actively participating in sustainability-related organizations that are recognized as being significant references for one or several sustainability themes by the industry.

Definition

LDC is currently a member of sustainability-related organizations that require us to comply with defined principles and criteria. This section does not cover ISO and other certification programs of industrial or farming assets related to licence to operate/SHE compliance. In addition, it does not include industry or trade associations, or business forums that are not specifically sustainability-related.

Scope

Policy applies to all LDC operations.

Ownership

Platform Head or Sustainability Committee identifies organizations where LDC should become a member.

Description of policy

Subscribing membership to sustainability-related organization should be:

- reported to Global Sustainability Manager
- consistent with LDC Sustainable Development Policy
- authorised by Platform Head
- validated by Regional CLO

The participation of LDC to an organization requires appointing a clear owner in the company to be the point of contact in charge of the relationship with the organization, and in particular of consistency in communication.

Breach in policy

1. If not compliant with principles and criteria of an organization where LDC is a member, the LDC contact person should have a formalized plan with clear owner, deadlines and target defined
2. Incident should be reported to the Global Sustainability Manager and included in the risk map under "business requirement" type of risk.

IV. Participation in Fair Trade-type Programs

Objective

To ensure LDC is actively participating in Fair Trade-type programs where appropriate, especially where membership is required for client or market access.

Definition

“Fair Trade is a trading partnership, based on dialogue, transparency and respect, that seeks greater equity in international trade. It contributes to sustainable development by offering better trading conditions to, and securing the rights of, marginalized producers and workers...” – FINE.

Scope

Policy applies to all LDC operations.

Ownership

Platform Head or Sustainability Committee identifies programs where LDC should become a member.

Description of policy

LDC participation in Fair Trade-type programs should be reported to Global Sustainability Manager



Requirements

Legal requirements

LDC respects the governing law of all countries in which we operate, and the subscribed international conventions protecting the rights of all communities with which we have contact.

Business requirements

We recognize that it is essential to both LDC's growth and to the wellbeing of local communities with which we interact to build long-term partnerships together. We can achieve this by implementing programs and initiatives that support local communities in their developmental efforts.

Code of Conduct

Community and Environment

Sustainable growth is a central issue for each of us and our families, it is also critical to our long term economic interests.

We promote the economic development and improvement of the quality of life of the communities where we operate and support actions to this effect.

I. Benevolent Community Programs

Objective

LDC recognizes that investing in the economic and social development of local communities in which we operate is central to the creation and promotion of long-term partnerships.

We support initiatives and programs that assist economic development, and improve the quality of life for those communities connected to our industrial and agricultural operations.

The LDC Sustainability Committee believes that investing in programs linked to the themes of agriculture, food, and children, is important. In addition to programs linked to our industrial or agricultural activities, participating in initiatives related to communities where LDC does not have an asset presence, but where one or more of the aforementioned themes is evident, is consistent with our values.

We also promote sound agricultural practices via research and education. In each instance, we will fully assess the effects of our contribution to the communities concerned by measuring the impact of our involvement.

Definition

Any action or initiative seeking to improve the quality of life of people and communities, defined as;

- families of LDC employees
- communities around LDC-owned or operated assets
- communities where LDC has offices
- rest of the world

Scope

Policy applies to all community initiatives undertaken at or by LDC-owned or operated locations, be they industrial, agricultural or office.

Ownership

Regional Sustainability Committee, to be nominated by the regional CEO.

Description of policy

1. Programs supporting economic and social development of local communities should be implemented around our assets – industrial and farming
2. Criteria to meet for all programs :
 - a. Programs should accommodate one or more specific themes as defined by the Sustainability Committee, namely **agriculture, food, children**
 - b. Programs should fit into priorities defined by the Regional Sustainability Committee and should be tailored to fit local needs.
 - c. Programs should have measurable impact (e.g. number of people concerned, number of training hours financed, literacy increase, reduction of disease, etc.)
 - d. Programs scope and budget should be defined by a formalized document
 - e. Programs must have a clearly defined owner within LDC
 - f. To ensure appropriate use of funds and limit the number of intermediate steps, financing structure should be:
 - i. Financing of organization with annual report on fund usage
 - ii. Paying for benevolent services directly where possible
 - g. No initiative should be dependant on LDC's contribution, either for the initial setup or for meeting annual costs. We recommend;
 - i. Maximum 20% of the program's setup or annual costs
 - ii. No commitment to a regular or annual contribution.
3. Regional Sustainability Committee should define Regional Policy, including:
 - a. Priorities/themes for the region
 - b. Regional investment decision process
 - c. Regional criteria for program selection
4. All programs should be reported to Global Sustainability Manager and included in the log of initiatives located on SharePoint.