

## 棕榈油可持续采购政策(NDPE 政策)

### Sustainable Sourcing Policy for Palm Oil (NDPE Policy)

作为棕榈油可持续发展产业链中的一分子，棕榈油在全球植物油市场占有重要的地位，元素集作为一家领先的化妆品原材料制造商，棕榈油衍生物是元素集产品的重要原材料。意识到棕榈油的相关种植发展对产地经济发展做出的重大贡献，同时森林砍伐和其他不利于可持续发展的做法对人类和环境产生了许多负面影响。为此，我们愿意与客户及棕榈油衍生物供应商等利益相关方密切合作，展开旨在保护森林、泥炭地以及人权和社会权利的相关活动。希望通过我们持续的宣传和努力，使企业和民众了解到环境与发展问题是全世界全人类所面临的重大挑战，同时环境的恶化将直接影响到人类的生存和可持续发展。

As a member of the sustainable development industry chain of palm oil, palm oil holds an important position in the global vegetable oil market. As a leading cosmetic raw material manufacturer, Eleco's palm oil derivatives are important raw materials for Eleco's products. Realizing the significant contribution of palm oil cultivation to the economic development of the producing areas, while deforestation and other practices that are detrimental to sustainable development have many negative impacts on humans and the environment. To this end, we are willing to work closely with stakeholders such as customers and palm oil derivative suppliers to carry out activities aimed at protecting forests, peatlands, as well as human and social rights. We hope that through our continuous promotion and efforts, businesses and the public can understand that environmental and development issues are major challenges facing humanity worldwide, and that environmental degradation will directly affect human survival and sustainable development.

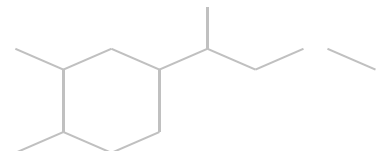
元素集在致力于创造卓越产品的同时，愿意通过从产品结构、生产工艺开发及原材料采购各个环节的共同努力，尤其在原料采购环节我们会把棕榈油可持续发展和 NDPE（没有砍伐、不破坏泥炭、没有剥削）理念推广介绍，在同等条件下优先从有共同理念的供应商处采购原料。让我们在生产棕榈油相关产品的同时与自然环境和谐相处。运用我们在过去，现在和未来取得的成功，一起鼓励更多企业加入我们的征程，为日益增长的可持续发展棕榈油市场贡献自己的力量！

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While committed to creating excellent products, Eleco is willing to work together in all aspects of product structure design, production process development, and raw material procurement. Especially in the raw material procurement process, we will promote and introduce the sustainable development of palm oil and the NDPE (no logging, no destruction of mud and charcoal, no exploitation) concept. Under equal conditions, we will prioritize purchasing raw materials from suppliers with a common philosophy. Let us coexist harmoniously with the natural environment while producing palm oil related products. By leveraging our past, present, and future successes, we encourage more businesses to join our journey and contribute to the growing sustainable palm oil market!

## 目标 Goals

### 一、 保护森林、泥炭地和其他自然生态系统:

#### Protecting Forests, Peatlands and Other Natural Ecosystems:

森林砍伐和自然生态系统退化是地球面临的巨大威胁之一。当森林被转化为农业等其他用途时，就会发生毁林。当森林生态系统失去向人类和自然提供重要生态服务的能力时，就会出现森林退化。泥炭地和其他自然生态系统提供重要的生态服务，如固碳和生物多样性栖息地，并支持生计。它们完整的功能为社区和农业提供了巨大的利益。

我们的目标是到 2030 年对森林产生积极影响，这要求我们在供应链中完全消除森林砍伐，并恢复被砍伐的森林和退化的地区。为了实现这一目标，我们希望我们的棕榈衍生物供应商遵守以下规定：

Deforestation and degradation of natural ecosystems are one of the biggest threats to our planet. Deforestation occurs when forests are converted to other uses such as agriculture. Forest degradation arises when forest ecosystems lose their capacity to provide important ecological services to people and nature. Peatlands and other natural ecosystems provide critical ecological services such as carbon sequestration and biodiverse habitats, as well as support livelihoods. Their intact functioning provides significant benefits to communities and agriculture.

Our goal is to have a positive impact on forests by 2030, requires the complete elimination of deforestation in our supply chains, as well as restoring deforested and degraded areas. To deliver this goal, we expect our palm suppliers to adhere to the following:

#### 1. 禁止砍伐森林和将合法或非法的天然林转化为棕榈油生产；

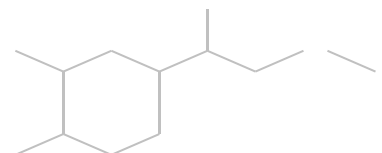
Eliminate deforestation and conversion of natural forests, legal or illegal, for conversion to palm oil production;

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2. 保护和监测高碳储量方法定义的高碳储量森林；

Conserve and monitor High Carbon Stock (HCS) forests as defined by the HCS Approach;

3. 保护和监测 HCV 资源网络所界定的高保护价值 (HCV) 地区，包括保护本地动植物，特别是稀有、受威胁和濒危物种；

Conserve and monitor High Conservation Value (HCV) areas as defined by the HCV Resource Network, including the protection of native animals and plants, especially rare, threatened and endangered species;

4. 泥炭地不开发，无论深度如何；

No development on peatland, regardless of depth;

5. 对现有的泥炭油棕种植园采用 RSPO 最佳管理规范；

Apply RSPO Best Management Practices for existing oil palm plantations on peat;

6. 在发生毁林、改造或退化的地方实施恢复和补偿活动；

Implement restoration and compensation activities where deforestation, conversion or degradation has occurred;

7. 绝不容忍焚烧行为或使用火进行土地清理/重新种植；

Zero tolerance for burning practices or use of fire for land clearing/replanting;

8. 逐步减少现有业务的温室气体排放。

Progressively reduce greenhouse gas (GHG) emissions on existing operations.

## 二、消除侵犯人权和童工现象：

Eliminating Human Rights Violations and Child Labor:

我们相信，我们对所有的利益相关者——农民、员工、股东、客户、消费者、供应商和我们经营所在的社区——都负有责任。为确保在我们的业务中尊重人权，我们希望供应商遵守以下规定：

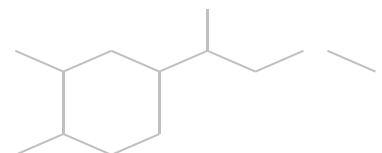
We believe we have a responsibility towards all our stakeholders – farmers, employees, shareholders, customers, consumers, suppliers, and the communities where we operate. To ensure human rights are respected across our operations, we expect our suppliers to adhere to the following:

1. 按照当地人权法规的规定，建立并实施人权制度；

Establish and implement a human rights system in accordance with local human rights laws and regulations;

2. 禁止并消除一切形式的强迫劳动、童工和人口贩卖，包括但不限于任何形式的抵债劳动；

Prohibit and eliminate all forms of forced labor, child labor<sup>1</sup> and human trafficking, including, but not limited to, any form of bonded labor;



3. 根据供应商行为准则的要求，保护工人的权利，确保安全健康的工作场所，避免强迫或强制劳动；

Protect workers' rights and ensure safe and healthy workplaces free from forced or compulsory labor as required by our Supplier Code of Conduct;

4. 为所有权利人和利益相关者建立有效的申诉机制；

Put in place an effective grievance mechanism accessible to all rights-holders and stakeholders;

5. 根据当地法律法规，尊重土著和当地社区的权利，包括对他们拥有法律、社区或习惯权利的土地和资源的使用给予或不给予自由、事先和知情同意的权利；

Respect the rights of Indigenous and local communities, including the right to give or withhold their Free, Prior and Informed Consent (FPIC) to operations on lands and the use of resources to which they hold legal, communal or customary rights.

6. 尊重小农的权利，支持将小农纳入供应链；

Respect the rights and support the inclusion of smallholders into the supply chain;

7. 保护环境和人权维护者，禁止对任何提出关切或参与调查的人进行威胁、骚扰、恐吓、使用暴力或报复；

Protect environmental and human rights defenders and prohibit threats, harassment, intimidation, the use of violence, or retaliation against anyone who raises a concern or participates in an investigation;

8. 在发生侵犯人权事件时，通过双方商定的程序提供补救。落实我们的政策。

Provide remediation through mutually agreed procedure, where Human Rights violations have occurred.

### 三、认证 Certification:

通过可持续棕榈油圆桌会议 (RSPO) 进行的认证在推动可持续棕榈油市场向前发展方面发挥了关键作用。我们将继续支持 RSPO 认证棕榈油的生产 and 采购，Eleco 已通过 SGS 认证 (RSPO-MB)。与此同时，我们将继续通过其他项目和倡议，在 RSPO 工作的基础上继续发展。

Certification, through the Roundtable for Sustainable Palm Oil (RSPO), has played a key role in bringing the sustainable palm oil market far forward. We will continue to support the production and sourcing of RSPO-certified palm oil, Eleco has been certified by SGS (RSPO-MB). In the meantime, we will continue to build on the work of the RSPO through other projects and initiatives.

### 四、可追溯性 Traceability:

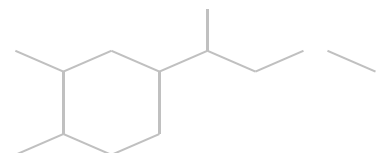
我司使用的所有棕榈原料均间接来自第三方供应商和贸易商。可追溯性数据是能够在实

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地监测森林砍伐、自然生态系统和社会状况的先决条件。

All palm ingredients used by Barry Callebaut are indirectly sourced via third-party suppliers and traders. Traceability data is a prerequisite to be able to monitor deforestation, natural ecosystems and social conditions on the ground.

我们每年进行一次供应商评估和参与活动，以评估关键领域的实施进展，并标记供应链中发现的任何 NDPE 不合规情况。评估的关键领域包括上游供应商 NDPE 监控和验证、投诉管理和供应商的透明度和报告。

We conduct an annual supplier evaluation and engagement exercise to assess implementation progress in key areas and flag any NDPE non-compliances detected in supply chains. Key areas assessed include upstream supplier NDPE monitoring and verification, grievance management, transparency and reporting.

我们每年分析可追溯性和供应商评估数据，以形成我们监测 NDPE 合规性的基础。根据结果与供应商进行讨论，以了解任何潜在的不合规情况，以及如何更好地共同努力实现 NDPE 目标。

We analyze traceability and supplier evaluation data annually to form the basis of our monitoring of NDPE compliance. Discussions based on the results are held with the suppliers to understand any potential non-compliance and how to work better together towards achieving NDPE goals.

苏州元素集化学工业有限公司  
Suzhou Eleco Chemical Industry CO., LTD.  
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