

POLICY ON HUMAN RIGHTS IN THE COFFEE SUPPLY CHAIN

1 June 2026



1 Preamble

The CAFEA Group is convinced that sustainable coffee cultivation and long-term economic success are inextricably linked to respect for human rights and the promotion of decent working conditions. As a company that sources and markets coffee from various countries of origin, we are part of global supply chains characterised by a wide range of different stakeholders. We recognise that social, economic and legal conditions can vary considerably across countries of origin and that human rights challenges persist, particularly within agricultural supply chains.

Against this background, we are committed to promoting respect for human rights in the course of our business activities and to avoiding, mitigating or remedying any negative impacts on people and communities wherever possible. In doing so, we are guided by the United Nations Guiding Principles on Business and Human Rights, the core labour standards of the International Labour Organisation (ILO), the ETI Base Code of the Ethical Trading Initiative (ETI), the OECD Guidelines for Responsible Business Conduct, and the principles of the Accountability Framework Initiative (AFi).

We view our responsibility as an ongoing process of human rights due diligence, based on transparency, cooperation, risk assessment and continuous improvement. At the same time, we recognise the limits of our direct influence within complex supply chains. This makes it all the more important for us to actively utilise our business relationships, procurement decisions and dialogue channels to promote positive change and support responsible business practices throughout the coffee supply chain.

Our aim is to work together with our suppliers, producers, business partners and other stakeholders to ensure that the people involved in the production and processing of coffee can work under conditions that respect their dignity, safety and fundamental rights.

2 Scope

This Human Rights and Labour Policy applies to all business activities of the CAFEA Group relating to the sourcing, trading, processing and distribution of coffee and coffee-related products.

The policy applies to all employees of the CAFEA Group as well as to all business partners with whom we maintain direct or indirect business relationships. These include, in particular, coffee producers, farms, cooperatives, producer groups, processing facilities, exporters, importers, traders, logistics service providers, recruitment agencies, and other suppliers and service providers that form part of the coffee supply chain.

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We expect our direct business partners to respect the principles set out in this policy and, in turn, to commit to taking appropriate account of these requirements within their own business relationships and supply chains. In doing so, we recognise that the implementation of human rights requirements may vary depending on company size, organisational structure, geographical context and scope of influence.

This policy focuses on the human rights and labour rights risks that typically arise in agricultural supply chains. These include, in particular, child labour, forced labour, human trafficking, discrimination, harassment, unsafe working conditions, restrictions on freedom of association, and other risks to the fundamental rights and dignity of workers.

The requirements of this policy complement the applicable national laws and regulations. Where international human rights standards go beyond local legal requirements, the CAFEA Group aims to promote and support the higher standards within the scope of its influence. Should conflicts arise between local legal requirements and international standards, we will work with our business partners to seek lawful and practicable ways to implement the principles of this policy as effectively as possible.

This policy forms the basis of our human rights risk management, our communication with suppliers and our ongoing efforts to promote responsible and sustainable coffee supply chains. It is reviewed regularly and, where necessary, adapted to new legal requirements, international standards or changing risk situations.

2.1 Our commitment to human rights and decent work

The CAFEA Group is aware of its responsibility to support and promote respect for human rights and decent working conditions within its coffee supply chains. As a company that sources and distributes coffee, we recognise that our ability to influence matters is not always direct or unrestricted. Nevertheless, within the framework of our business relationships, our procurement decisions and our ongoing dialogue with suppliers and other stakeholders in the value chain, we are committed to identifying and minimising human rights risks and promoting positive change.

Global coffee production often takes place in regions facing social and economic challenges. Smallholder farming structures, seasonal employment, informal working arrangements, fluctuations in income and a lack of state enforcement of labour rights can increase the risk of human rights violations. As a player in a complex supply chain, we recognise that we cannot directly control all risks. At the same time, we regard it as our responsibility to consistently use our influence to promote improvements, raise awareness amongst business partners and support long-term change.

In line with the recommendations of the OECD Due Diligence Guidance for Responsible Business Conduct and the United Nations Guiding Principles, we adopt a risk-based approach

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to human rights due diligence. This means that we endeavour to identify actual and potential adverse impacts on human rights, prevent them from arising and, where risks are identified, take appropriate measures to mitigate or remedy them.

2.2 Child labour

The protection of children is a central focus of our commitment to human rights. We expect our business partners to comply with the requirements of ILO Convention No. 138 on the minimum age for employment and ILO Convention No. 182 on the worst forms of child labour. Furthermore, we adhere to the guidelines of the ETI Base Code and the principles of the United Nations Children's Fund on the protection of children in corporate supply chains.

We are aware that, in many coffee-growing regions, children on family-run farms traditionally participate to a limited extent in family-related activities. It is crucial that such activities are neither dangerous nor do they impair children's physical development, health or education. Forms of child labour that endanger children, exploit them or prevent them from attending school are not in line with our expectations of responsible business practices.

Within the scope of our capabilities, we promote awareness-raising, training and dialogue with suppliers and producer organisations in order to identify risks of child labour at an early stage and address them preventively. Should such risks or incidents come to light, we work with our business partners to find solutions that prioritise the welfare and future prospects of the children affected.

2.3 Forced labour, modern slavery and human trafficking

We support the principles of ILO Conventions Nos. 29 and 105 on the abolition of forced labour, as well as the requirements of the United Nations and the OECD for combating modern slavery and human trafficking. We expect our suppliers to ensure that employment relationships are entered into on a voluntary basis and that employees are able to take up and terminate their employment without undue restrictions.

Practices such as the withholding of identity documents, the charging of unreasonable recruitment fees, debt bondage, coercion to work through violence or intimidation, and any form of human trafficking are not in line with our company's expectations. At the same time, we recognise that increased risks may exist, particularly in the case of seasonal workers, migrants or within complex subcontracting structures.

We therefore endeavour to promote transparency within our supplier relationships, assess risks and support our business partners in implementing responsible recruitment and employment practices. In doing so, we are guided, amongst other things, by the

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OECD recommendations and the Accountability Framework Initiative's guidelines on respecting human rights in agricultural supply chains.

2.4 Freedom of association and workers' rights

We respect the right of workers to freely represent their interests, to form or join trade unions, and to engage in collective bargaining. This approach is based on ILO Conventions Nos. 87 and 98, as well as the requirements of the ETI Base Code.

In countries or regions where freedom of association is restricted by law or can only be exercised to a limited extent in practice, we expect our business partners to facilitate alternative forms of open and constructive dialogue with employees. We are convinced that respectful cooperation between management and employee representatives makes an important contribution to stable and sustainable supply chains.

2.5 Discrimination, equal treatment and respectful conduct

We support the principles of the United Nations Universal Declaration of Human Rights, as well as ILO Conventions Nos. 100 and 111 on equal treatment and non-discrimination. All people should be treated with respect, regardless of gender, age, ethnic origin, nationality, religion, disability, sexual orientation, marital status or political beliefs.

We expect our business partners to provide a working environment characterised by respect, fairness and equal opportunities. Harassment, intimidation, corporal punishment, sexual violence or other forms of degrading treatment are not in line with our human rights expectations.

2.6 Health and safety at work

The health and safety of workers are essential components of decent work. In accordance with the requirements of the ETI Base Code and the relevant ILO standards, we expect our business partners to take appropriate measures to protect their workers.

In coffee production in particular, risks may arise from agricultural machinery, the handling of plant protection products, physically demanding work or inadequate accommodation for seasonal workers. We therefore promote the exchange of good practices and support measures that help to continuously improve working conditions and reduce work-related health risks.

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2.7 Human Rights Due Diligence and Risk Management

In line with the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance and the guidelines of the Accountability Framework Initiative, we pursue a continuous approach to human rights due diligence.

This includes assessing human rights risks, engaging with suppliers and relevant stakeholders, taking human rights criteria into account in procurement decisions, and promoting improvement measures within the supply chain. We pay particular attention to regions and production contexts where there is an increased risk of child labour, forced labour, human trafficking or other serious human rights violations.

We do not view human rights due diligence as a one-off measure, but as an ongoing process of learning, collaboration and continuous improvement.

2.8 Cooperation and improvement rather than exclusion

We are convinced that sustainable improvements are often achieved through long-term collaboration, capacity-building and dialogue. We therefore generally pursue an approach of constructive collaboration with our business partners. Where risks or breaches are identified, we initially aim to work together to develop appropriate measures for improvement and to monitor their implementation.

At the same time, we reserve the right to consider appropriate business consequences in the event of serious or repeated breaches, or a lack of willingness to improve. The decision on appropriate measures is made taking into account the severity of the matter, our company's scope for influence and the potential impact on those affected.

2.9 Complaints mechanisms and access to remedy

We support the establishment of accessible and trustworthy grievance mechanisms, as recommended in the UN Guiding Principles on Business and Human Rights and the Accountability Framework. Employees and other potentially affected individuals should have the opportunity to raise human rights concerns without fear of discrimination or retaliation.

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organisation's core labour standards and the Ethical Trading Initiative's (ETI) Base Code, the CAFEA Group supports the independent grievance mechanism EAR4U, which provides low-threshold access for reporting potential human rights and labour rights violations in the coffee supply chain. Through EAR4U, employees and other stakeholders can report concerns confidentially and, if they wish, anonymously, on issues such as child labour, forced labour or other abuses: <https://www.ear4u.org>

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Should reports of human rights violations come to light, we work together with the business partners concerned to ensure a proper investigation of the situation and the development of appropriate remedial measures. In doing so, we are guided by the principles of fairness, transparency and the protection of those affected.

3 Our ongoing commitment

Respect for human rights is an ongoing process for the CAFEA Group. We recognise that the challenges within global agricultural supply chains are complex and cannot be resolved by individual actors alone. We therefore focus on long-term partnerships, transparency, dialogue and continuous improvement. Within the scope of our capabilities, we will use our influence to contribute to a coffee supply chain that respects the dignity, safety and rights of the people involved in its production.

International standards referred to This

policy is based in particular on:

- UN Guiding Principles on Business and Human Rights (UNGPs), United Nations, 2011
- United Nations Universal Declaration of Human Rights (1948)
- International Covenant on Economic, Social and Cultural Rights (1966)
- ILO Core Labour Standards (Conventions Nos. 29, 87, 98, 100, 105, 111, 138 and 182)
- ETI Base Code of the Ethical Trading Initiative
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023)
- OECD Due Diligence Guidance for Responsible Business Conduct (2018)
- Accountability Framework – Core Principles and Operational Guidance
- UNICEF Children's Rights and Business Principles
- UN Global Compact Principles on Human Rights and Labour Standards.