

# TOUTON

## Human Rights Policy

November 2024

*As a supply-chain actor sourcing tropical commodities from many regions, we recognise that the success of our commercial activity depends on the consistency and balance between the group's resources, its business model, its development ambitions, and its social and environmental impact.*

*In line with our corporate due diligence processes, we regularly review our risks across our supply chains and operations. This in turn informs our group commitments and policies as well as our programming priorities.*

*Our corporate sustainability strategy is called PACT, the Positive Agri Culture by Touton. It is developed with our Management Team and endorsed by Touton's Board of Directors.*

*It aims to promote a resilient Agri-Industry built on a Culture of Trust and Positive Growth. Our strategy is embedded in our management systems and processes and is operationalised through our various programmes, including our PACT STANDARD.*

In line with our Culture of Trust, our Human Rights Policy sets out our commitment to uphold workers' rights in our own operations and in our supply chains.

It applies to Touton group and all its subsidiaries' employees. We expect our suppliers and partners to uphold these principles and provide them with guidance and support to meet them.

### Our commitment to protecting Human Rights

We are committed to fostering producers' and communities' well-being and empowerment through bespoke interventions that put human rights and social equity first.

We comply with and often exceed local, national and international regulatory guidelines and requirements and require that our suppliers act a minima in accordance with these.

Our Human Rights Policy is supported by other codes and policies as well as our programming activities in our supply chains:

- Touton CSR Strategy: PACT
- Touton Code of Ethics
- Touton Supplier Code of Conduct
- Touton group Grievance Mechanism
- Thematic and Product specific Policies
- Due diligence policies & procedures

## Salient Human Rights Issues

Our due diligence process is based on the OECD guidelines for responsible business conduct and the United Nations Guiding Principles for enterprises.

As such, we conduct a regular analysis of our risks across our supply chains and operations. This in turn informs our group commitments and policies as well as our priorities for strengthening our management systems.

Our corporate risk mapping<sup>1</sup> includes the likelihood and severity of potential adverse impacts on human rights linked to our direct or indirect operations.

As a supply-chain actor primarily engaged in the sourcing of raw tropical commodities from a great number of smallholder farmers, our most salient human rights risks are linked to farmer livelihoods, protection from abusive labour practices, and decent and safe work conditions.

Respect for core human rights, including the protection of children and non-discrimination based on gender or race, cuts across all our programmes.

All our data is broken down by gender which allows us to better target programmes. We ensure girls and women have equal access to education and to training and coaching activities. We are scaling-up financial inclusion programmes for women, notably through Village Savings & Loans Associations (VSLA) in partnership with our customers.

### 1) Farmer Livelihoods

Depending on the risk profiles of the communities and areas where we source products across our different supply chains, we implement a variety of programmes that aim to:

- Provide farmers with training and backstopping necessary to improve their yields in a responsible manner.
- Promote diversified income streams. As we source products from different supply-chains we can combine production of different crops while ensuring market off-take of these.
- Support farmers or groups of farmers in accessing finance at competitive rates.

Labour shortages are rife in many supply chains. We train and equip *agripreneurs* to provide skilled labour to farmers at a competitive price.

We work with our customers and other supply chain partners on addressing the living income gap notably through the negotiation of responsible purchasing terms. We also strive to ensure farmers do not bear the costs of compliance with producing countries' requirements.

---

<sup>1</sup> See p. 117 of our [2023-2024 Sustainability Report](#)

We promote and encourage participatory approaches when it comes to programme design. Our community sensitisation processes and our collaboration with cooperatives and farmer groups include mechanisms to allow farmers to voice their preferences and concerns as to activities conducted.

## 2) Protecting Children and Adults from abusive labour practices

Touton is against all forms of human exploitation and is firmly committed to contributing to the removal of child labour from its agricultural supply chains. We are working with communities we source from, our industry peers and civil society, wherever possible under the leadership of governments, to help address Child Labour and Forced Adult Labour. Either through targeted interventions (awareness raising, remediation where children or adults are identified in abusive labour) or by addressing the root causes of the problem (poverty, limited access to services including education and health, and access and cost of skilled labour).

### Forced Labour

Forced labour has no place in responsible supply chains. We work to sensitise farmers and their communities on the reality of abusive labour conditions and their rights. Either individually or in collaboration with other actors, we implement grievance mechanisms to allow farmers to raise concerns. We act with partners to facilitate mediation and when necessary to refer suspected cases to local referral structures.

Work must be conducted on a voluntary basis without any forms of intimidation to coerce workers or practices preventing their freedom of movement. Retention of workers' personal documents is also prohibited.

### Child Labour

We implement due diligence systems to assess risk and implement child labour identification and monitoring systems in our supply chains.

In many small-holder farming contexts family labour can be used on farm. In line with the International Labour Organisation (ILO) conventions and national norms, we work resolutely to ensure children are protected from performing tasks that endanger them.

Children below the age of 15 (or legal school age if below) are not allowed to work on farms during school hours and no child must carry out hazardous work or other worst forms of child labour.

We are committed to having 100% coverage of Child Labour & Monitoring Systems in our Cocoa Supply-Chain (which remains our largest) by 2025 and are now adapting our programmes for Coffee and other supply-chains.

Access to Education is a key lever for children's protection and development. We are proud to co-fund and support the Child Learning and Education Facility in Côte d'Ivoire.

Where we do not have a direct link with farmers, we require through our Supplier Code of Conduct that our suppliers operate with dignity, respect and integrity in regard to the treatment of their employees and workers.

### **3) Safe Working Conditions**

Our aim is to apply the same work ethics when it comes to the safety of partner farmers as we do in our own operations.

Touton and its implementing partners provide training on appropriate dosage, application methods and proper timing of crop protection products as well as safety measures to prevent harm to farmers and their household members (e.g. through personal protective equipment).

Specific child-protection training curricula, such as that developed by the International Cocoa Initiative (ICI) also reinforce farmers' awareness of the danger of agrochemicals to children, youths and pregnant women.

Training material used by Touton staff and implementing partners include visual aids and prompts and is predicated on safe child interviewing techniques.

### **4) Protecting the Free Prior and Informed Consent of indigenous peoples**

We commit to respect the rights of indigenous peoples to give or withhold their prior consent for any activity that can impact their customary or legal rights including with regards to land use in accordance with the UN guidelines on Free Prior Informed Consent (FPIC) and the UN Declaration on the Rights of Indigenous Peoples (2007).

### **5) Data Privacy**

Touton commits to comply with all applicable laws and regulations about data protection. We collect a significant amount of data from partner farmers and adhere to industry standards in terms of data protection and confidentiality, while aiming to create feedback for farmers to benefit from data collected on their farms.

Our suppliers are expected to have implemented systems to protect the confidentiality of personal information and protect them from unauthorised usage.

## **Due diligence procedures**

Our risk assessment, prevention, mitigation and remediation activities are aligned with the OECD guidelines for responsible business conduct and the United Nations Guiding Principles for enterprises.

Touton has implemented due diligence processes and operational practices and procedures to identify, prevent and mitigate adverse impacts on human rights. This includes risk assessment, verification and audits.

We take measures to remediate where possible any violation of human rights identified and expect our suppliers to adopt the same approach within their supply chain as required in our Supplier Code of Conduct.

## Reporting on our progress and challenges

Over the years, Touton has invested considerably in strengthening its sustainability, compliance, and monitoring and evaluation teams at group level, or within its country subsidiaries. This allows us to build specific tools for the collection, analysis and verification of the data we use internally and informs our decisions and services externally.

We actively engage in sectorial initiatives to exchange on best practices to address human rights risks in our supply chains and report progress and challenges through different channels. We proudly engage with the International Labour Organisation, the United Nations Global Compact and the International Cocoa Initiative.

Our [Annual Sustainability Report](#) offers a detailed presentation of our actions to protect and uphold human rights in our own operations and in our sustainable sourcing operations and programmes. It includes an overview of progress<sup>2</sup> against non-financial performance indicators which are audited by an independent third-party body accredited by the French COFRAC.

We are in the process of reviewing our human rights metrics to align with the upcoming Corporate Social Reporting Directive (CSRD) and the Corporate Social Due Diligence Directive (CSDDD).

*" Touton continuously evaluates and improves its own policies and practices to conduct its business in an ethical and responsible manner and in compliance with all applicable laws and regulations. We therefore reserve our right to review this policy from time to time."*

### Texts & Reference Framework:

- ILO Forced Labor Convention, 1930 (No.29)
- ILO Equal Remuneration Convention, 1951 (No.100)
- ILO Abolition of Forced Labor Convention, 1957 (No.105)
- ILO Discrimination (Employment and Occupation) Convention, 1958 (No.111)
- ILO Minimum Age Convention, 1973 (No.138)
- ILO Indigenous and Tribal Peoples Convention, 1989 (No.169)
- ILO Worst Forms of Child Labor Convention, 1999 (No.182)
- ILO Violence and Harassment Convention, 2019 (No.190)
- The UN guidelines on Free Prior Informed Consent (FPIC)
- The UN Declaration on the Rights of Indigenous Peoples (2007)

---

<sup>2</sup> See our latest Sustainability Report pp. 80-85; 90-93; 96-99 + progress indicators pp. 114-115