



Responsible Sourcing & Sustainable Palm Oil Policy

1. Purpose

At Independent Chemical Corporation, we recognize the importance of responsible sourcing and the environmental and social considerations associated with palm oil and palm-derived materials.

As a distributor, we does not own or operate palm plantations, mills, or refineries. Our role in supporting sustainable palm supply chains is focused on supplier engagement, responsible procurement practices, supply chain transparency, and providing customers with sustainable sourcing options where available.

2. Sustainable Palm Oil Commitment

We supports the objectives of the Roundtable on Sustainable Palm Oil (RSPO) and the continued development of environmentally and socially responsible palm oil supply chains.

Our Commitment

- Supporting responsible and sustainable sourcing of palm and palm-derived materials.
- Working with suppliers to identify the origin and sustainability status of applicable palm-derived products.
- Encouraging suppliers to maintain recognized sustainable sourcing practices and certifications.
- Improving transparency and traceability within our palm-derived product supply chains.
- Maintaining appropriate supplier due diligence and sustainability evaluation processes.
- Supporting customer sustainability and responsible sourcing requirements.

RSPO-Certified Product Availability

Not all palm-derived products distributed by ICC are RSPO-certified.

RSPO certification status is specific to the individual product, grade, manufacturing site, supplier, and applicable RSPO supply chain model.

When a customer requires an RSPO-certified product, we will work with its approved supplier network to identify and provide an appropriate RSPO-certified grade when commercially available and capable of meeting the customer's technical and commercial requirements.

Customers requiring RSPO-certified material should communicate this requirement during the quotation or ordering process so that certification status and supporting documentation can be verified for the specific material being supplied.

We does not represent a product as RSPO-certified solely because it contains palm or palm-derived ingredients.

3. No Deforestation, No Peat, No Exploitation (NDPE)

ICC supports the principles of No Deforestation, No Peat, and No Exploitation (NDPE) within palm-related supply chains.

No Deforestation

ICC supports sourcing practices intended to prevent the conversion of forests and other environmentally significant areas for palm production.

No Development on Peat

ICC supports responsible land-management practices that avoid new development of peatlands for palm production.

No Exploitation

- Prohibition of forced and compulsory labor
- Prohibition of child labor
- Safe and healthy working conditions
- Fair and respectful treatment of workers
- Non-discrimination
- Respect for applicable rights of local and Indigenous communities

NDPE - Our Role

As a downstream distributor, ICC does not directly control agricultural or plantation activities. We therefore seek to support these principles through supplier engagement, responsible sourcing practices, information requests, and continuous improvement of supply chain transparency.

4. Responsible Supplier Sourcing

We recognize that responsible sourcing requires engagement throughout the supply chain. Our supplier evaluation and due diligence activities may consider:

Responsible Sourcing Considerations

- Compliance with applicable laws and regulations
- Environmental management practices
- Human and labor rights
- Ethical business practices
- Product and supply chain traceability
- Country or region of origin
- RSPO certification status, where applicable
- Sustainable sourcing programs
- Deforestation-related information
- Customer-specific sustainability requirements

Supplier Due Diligence

For products that may contain palm or palm-derived materials, we may request information from suppliers regarding the underlying feedstock, sustainability status, RSPO certification, supply chain model, origin, and other relevant sustainability information.

Where information is incomplete or unavailable, we may conduct additional supplier follow-up or risk-based review as appropriate.

5. Supplier Expectations

We expect suppliers to conduct business ethically, responsibly, and in accordance with applicable laws and regulations. We encourage suppliers to support:

Supplier Expectations - Key Areas

- Environmental protection and pollution prevention

- Responsible management of natural resources
- Prevention of illegal deforestation
- Respect for human and labor rights
- Safe working conditions
- Prohibition of forced labor, child labor, and human trafficking
- Anti-bribery and anti-corruption principles
- Responsible sourcing and supply chain transparency
- Cooperation with reasonable sustainability and traceability information requests

Palm-Derived Materials

For palm-derived materials, suppliers are encouraged to participate in recognized sustainable palm initiatives and make RSPO-certified products available where commercially feasible.

6. EUDR Readiness and Supply Chain Transparency

We recognize the objectives of the European Union Deforestation Regulation (EUDR) and the increasing importance of deforestation-free supply chains and commodity traceability.

For applicable products and customer requirements, ICC may request available information from suppliers concerning:

EUDR Information

- Country of production or origin
- Palm or palm-kernel feedstock
- Supply chain traceability
- Deforestation-free status
- Geolocation or upstream traceability information, where applicable and available
- Supplier due diligence documentation
- Other information relevant to customer EUDR due diligence

EUDR Cooperation

We will cooperate with reasonable customer requests for available supply chain documentation.

The availability and level of upstream information may vary depending on the product, supplier, manufacturing source, supply chain structure, and ICC's position within the supply chain.

7. Human Rights and Ethical Sourcing

We support internationally recognized principles concerning human rights and ethical business conduct.

We do not tolerate forced labor, child labor, human trafficking, or other forms of modern slavery within its own operations and expects suppliers to maintain comparable standards within their operations and supply chains.

Human Rights Principles

- Safe and healthy working conditions
- Fair and respectful treatment
- Equal opportunity and non-discrimination

- Compliance with applicable wage and working-hour requirements
- Prohibition of forced and child labor
- Ethical and lawful business conduct

8. Continuous Improvement

We view responsible sourcing as an ongoing process. We will periodically review our supplier sustainability practices, available product information, customer requirements, and relevant regulatory developments to identify opportunities for improvement.

Our objective is to progressively improve supply chain transparency and the availability of responsibly sourced materials while maintaining the quality, regulatory compliance, and service expected by our customers.

Important Product Certification Statement

Unless specifically identified and supported by appropriate documentation, products sold by ICC should not be assumed to be RSPO-certified solely because they contain palm or palm-derived ingredients. Customers requiring RSPO-certified materials should communicate this requirement before purchase so that ICC can verify availability and certification status for the specific product being supplied.