



Supplier Code of Conduct

Domaine de Graux

Scope

Our Supplier Code of Conduct is an integral part of the formal governance of Domaine de Graux. The same principles and standards are consistently applied throughout all our governance policies.

Our mission is to prove that regenerative, organic farming can work at scale and can increase farmer resiliency. At Domaine de Graux, we are committed to treating our suppliers fairly and ethically, as set out in this Code of Conduct.

The Supplier Code of Conduct includes our expectations with regard to Environment, Social & Governance for our suppliers. We expect our suppliers to share the standards expressed in this Code and to cascade these standards further down their supply chain.

This Supplier Code of Conduct is considered to be an integral part of normal business relations and all contracts concluded with Domaine de Graux. It has been updated to reflect obligations arising from EU regulations, including the Corporate Sustainability Reporting Directive (CSRD, 2022/2464), the Corporate Sustainability Due Diligence Directive (CSDDD, 2024/1760), the EU Deforestation Regulation (EUDR, 2023/1115), the Nature Restoration Law (2024/1991), and the EU Organic Farming Regulation (2018/848).

1. COMPLY WITH LAWS

At Domaine de Graux, we expect suppliers to comply with all applicable laws and regulations in the countries in which they operate. Where there is a difference between a legal requirement and our Code of Conduct or compliance policies, the higher standard shall always be applied.

Suppliers must be aware of and comply with all relevant EU legislation, including but not limited to: CSRD (sustainability reporting), CSDDD (due diligence obligations), EUDR (deforestation-free supply chains), the EU Biodiversity Strategy 2030, and the EU Farm to Fork Strategy.

2. LABOUR AND HUMAN RIGHTS

At Domaine de Graux, we expect suppliers to respect and support human rights as set out in the International Bill of Human Rights and the 10 Principles of the UN Global Compact, in line with the UN Guiding Principles on Business and Human Rights (UNGPs). Suppliers must be fair employers and respect international labour standards, including the core conventions of the International Labour Organization (ILO), and all legislation prohibiting slavery and human trafficking.

In alignment with the CSDDD (Directive 2024/1760/EU), suppliers are required to identify, prevent, mitigate, and remediate actual and potential adverse human rights impacts within their operations and supply chains. Suppliers with more than 1,000 employees and a global net turnover above EUR 450 million should be prepared to demonstrate CSDDD compliance.



2.1 Child Labour

Suppliers must not employ children under 15 years of age. Where the law sets a higher minimum working age or compulsory schooling extends to a higher age, that limit applies. Children under 18 must not be employed in work that is hazardous or harmful to their health and safety, in line with ILO Conventions 138 and 182.

2.2 Forced Labour

Suppliers must not use forced or compulsory labour, meaning any work performed under threat or without free consent. This includes debt bondage, human trafficking, and withheld identity documents. This expectation applies to all tiers of the supply chain, consistent with the EU Forced Labour Regulation (2024/3015) and ILO Conventions 29 and 105.

2.3 Non-Discrimination

Suppliers must not engage in any discriminatory practices. Discrimination means any distinction, exclusion, or preference limiting equality of opportunity or treatment, whether based on race, colour, nationality, gender identity and expression, sexual orientation, political or religious conviction, cultural background, age, health status, disability, physical features, family obligations, or other characteristics protected by law.

2.4 Freedom of Association and Collective Bargaining

Suppliers must recognise and respect workers' freedom of association and their right to freely choose their representatives. The right to collective bargaining must be upheld, and worker representatives must be free from discrimination or retaliation, consistent with ILO Conventions 87 and 98.

2.5 Working Hours

Suppliers must comply with all national legal restrictions on working hours, including overtime. Workers must have at least one day off per week except in exceptional, time-limited circumstances. Working hours shall not exceed the limits set by the EU Working Time Directive (2003/88/EC) for suppliers operating within the EU.

2.6 Wages and Benefits

Suppliers must make conditions of employment clear at the point of hiring through written documentation in a language the worker understands. Suppliers must comply with all applicable laws on wages and benefits, including minimum wage, overtime, and piece-rate provisions, and must pay workers on time. Deductions from wages must never be used as a disciplinary measure.

Suppliers operating in the EU must comply with the EU Adequate Minimum Wages Directive (2022/2041). Domaine de Graux encourages suppliers to pay a living wage aligned with local benchmarks where minimum wage falls short.

2.7 Health, Safety and Wellbeing at Work

Health, safety, and workplace standards must meet all applicable laws and regulations. Suppliers must prevent accidents and work-related injuries and ensure that the workplace and its environment do not endanger workers' physical integrity or health. Sanitary equipment, canteens, and any housing provided must meet legal requirements. As a minimum, suppliers



must provide drinking water, clean toilets in adequate numbers, adequate ventilation, emergency exits, proper lighting, and access to medical care.

Suppliers must comply with EU Directive 89/391/EEC (framework on health and safety at work) and all relevant sector-specific EU OSH directives.

2.8 Diversity and Inclusion

Suppliers must conduct human resources policies based on the principles of equality, non-discrimination, and inclusion, with a view to reflecting social diversity and creating conditions of well-being, engagement, and development for all workers, including through training and awareness-raising programmes.

2.9 Bullying, Harassment and Disciplinary Practices

Violence, threats of violence, corporal punishment, mental, physical, or verbal abuse, sexual harassment, sexual abuse, and any other harsh or inhumane treatment are strictly prohibited. Suppliers must have in place a clear anti-harassment policy and a confidential grievance mechanism accessible to all workers.

2.10 Whistleblower Protection

Suppliers operating in the EU must implement a safe, confidential reporting channel and guarantee non-retaliation for whistleblowers, in compliance with the EU Whistleblower Protection Directive (2019/1937). This protection extends to workers reporting violations related to environmental law, human rights breaches, and food safety.

3. ENVIRONMENTAL CONSIDERATIONS AND REGENERATIVE AGRICULTURE

At Domaine de Graux, environmental stewardship is at the heart of our mission. We expect suppliers to commit to protecting the environment, actively reducing their negative impacts, and wherever possible contributing positively to ecosystem restoration. This section reflects the principles of the EU Green Deal, the EU Biodiversity Strategy 2030, the Farm to Fork Strategy, the Nature Restoration Law (Regulation 2024/1991/EU), and the EUDR (Regulation 2023/1115/EU).

Suppliers are encouraged to align their practices with the principles of regenerative agriculture: building soil health, increasing biodiversity, improving water cycles, and sequestering carbon, thereby contributing to climate resilience and ecosystem integrity.

3.1 Environmental Laws, Permits and Reporting

Suppliers must comply with all applicable environmental laws, standards, and regulatory notices. They must obtain, maintain, keep current, and comply with all necessary environmental permits, approvals, and registrations. Suppliers subject to CSRD obligations must include environmental information in their sustainability reporting, using the European Sustainability Reporting Standards (ESRS) as the applicable framework.

3.2 Soil Health and Land Management

Suppliers are expected to adopt land management practices that preserve and improve soil health over time. This includes minimising soil compaction, avoiding erosion, promoting organic matter accumulation, and using cover crops, crop rotations, and reduced tillage where appropriate.



In line with the EU Soil Monitoring Law (proposed, 2023) and the Farm to Fork Strategy target to reduce nutrient losses by at least 50%, suppliers must avoid land-use practices that degrade soil structure or deplete soil biodiversity. Suppliers are encouraged to conduct regular soil health assessments and share results with Domaine de Graux.

3.3 Biodiversity Protection and Ecosystem Restoration

Suppliers must not engage in activities that contribute to the destruction, fragmentation, or degradation of natural habitats, whether on their own land or via their supply chains. This expectation is directly aligned with the EU Nature Restoration Law (Regulation 2024/1991/EU), which sets binding restoration targets for agricultural, forest, and aquatic ecosystems.

Suppliers are encouraged to establish or maintain biodiversity refuges, hedgerows, buffer zones, flower strips, and other ecological infrastructure within their operations. Suppliers sourcing from or operating in High Conservation Value (HCV) areas must apply the HCV framework to prevent habitat loss.

- **EUDR compliance:** Suppliers placing cattle, cocoa, coffee, palm oil, soy, wood, rubber, or derived products on the EU market must comply with the EU Deforestation Regulation (EUDR, 2023/1115/EU). Suppliers must provide geo-localisation data and due diligence statements confirming products are deforestation-free and produced in compliance with relevant country-of-origin legislation.
- **Pesticides:** In line with the EU Sustainable Use of Pesticides Regulation (proposed revision, SUR) and the Farm to Fork target to reduce pesticide use by 50% by 2030, suppliers must actively work to reduce reliance on synthetic pesticides, particularly those classified as hazardous under EU Regulation 1107/2009. Integrated Pest Management (IPM) is the expected standard.
- **Fertilisers:** Suppliers must manage nutrient application in compliance with the EU Nitrates Directive (91/676/EEC) and the revised Fertilising Products Regulation (2019/1009). Excessive use of synthetic nitrogen fertilisers must be avoided; the use of organic, biostimulant, and precision fertilisation approaches is encouraged.

3.4 Energy and Climate

Suppliers must work to measure their direct and indirect (Scope 1, 2, and 3) greenhouse gas emissions across their activities. In line with the EU Climate Law (2021/1119/EU) and the CSRD's ESRS E1 standard, suppliers are encouraged to set emission reduction targets consistent with a 1.5°C pathway and to develop credible transition plans.

Suppliers are also encouraged to maximise the use of renewable energy, to optimise logistics and transportation to reduce fuel consumption, and to adopt energy efficiency measures across their operations. Suppliers operating in the EU Emissions Trading System (EU ETS) must fulfil all their ETS obligations.

3.5 Water Stewardship

Suppliers must minimise freshwater consumption and prevent contamination of water bodies. Water management practices must comply with the EU Water Framework Directive (2000/60/EC) and associated daughter directives. Suppliers in water-stressed regions are expected to conduct water risk assessments and implement reduction plans.



The use of chemicals, fertilisers, or other inputs that could contaminate surface water or groundwater is strictly controlled. Run-off management and responsible irrigation scheduling are expected practices.

3.6 Chemical Management

Suppliers must reduce their reliance on chemicals and exclude from use any substances hazardous to consumer health, worker safety, or the environment. Suppliers must comply with EU REACH Regulation (1907/2006/EC) and the EU CLP Regulation (1272/2008/EC). Substances of Very High Concern (SVHCs) listed on the REACH Candidate List must be actively phased out.

Suppliers certified under EU Organic Farming Regulation (2018/848/EU) or working towards such certification must demonstrate compliance with the restricted inputs list. Domaine de Graux strongly encourages all suppliers to adopt organic or transitional practices.

3.7 Waste and Circular Economy

Suppliers must measure, manage, and minimise all waste streams, including transported, imported, and hazardous wastes in accordance with the Basel Convention. Suppliers must comply with EU Waste Framework Directive (2008/98/EC) and applicable sector regulations including packaging waste rules under the revised EU Packaging and Packaging Waste Regulation.

Suppliers are encouraged to adopt circular economy principles: reducing waste at source, reusing materials, and maximising recycling. Food waste reduction is a particular priority in line with the Farm to Fork target of a 50% reduction in food waste by 2030.

3.8 Environmental Management Systems

Suppliers are encouraged to implement a recognised environmental management system (such as ISO). At a minimum, suppliers must track key environmental indicators (energy consumption, water use, GHG emissions, waste generation) and make this data available to Domaine de Graux upon reasonable request.

Suppliers with more than 250 employees or meeting CSRD financial thresholds are expected to produce a sustainability report consistent with ESRS standards, which should address the environmental topics outlined in this section.

4. BUSINESS INTEGRITY

At Domaine de Graux, we act with honesty and integrity. We do not make or receive improper payments, benefits, or gains. We expect suppliers to act ethically, honestly, transparently, and trustworthily in all their dealings. The highest standards of ethical, moral, and lawful conduct are expected.

4.1 Anti-Bribery and Corruption

Suppliers must comply with all applicable laws related to corrupt practices including bribery, extortion, fraud, and unlawful restrictive trade practices. Suppliers must not offer, give, request, or receive any improper advantage in connection with any business activity. This applies equally to dealings with private sector counterparts and public officials, and aligns with the UN Convention Against Corruption.

Soliciting, offering, or accepting gifts, hospitality, or expenses that could influence a business-related decision is prohibited by Domaine de Graux and expected of all suppliers.



4.2 Conflict of Interest

Suppliers' workers must be free from actual or perceived conflicts of interest that could conflict with their responsibilities. Any actual or potential conflict must be disclosed promptly to the relevant decision-maker and managed transparently.

4.3 Confidentiality and Data Protection

Suppliers must take confidentiality seriously. All workers are required to protect the company's confidential information and intellectual property. Suppliers must also protect consumer and business partner confidential information and comply with all data privacy requirements in the jurisdictions in which they operate.

Suppliers processing personal data of EU residents must comply with the General Data Protection Regulation (GDPR, 2016/679/EU) in full.

4.4 Money Laundering and Fraud

Suppliers must reject any attempt to use their business to launder money and must only work with legitimate business partners. Suppliers maintain a zero-tolerance stance against fraud, including theft, misuse of assets, and falsification of expense claims or records.

4.5 Raising a Concern

Any person with a concern regarding this Supplier Code of Conduct or its application is encouraged to speak directly to their contact at Domaine de Graux. All cases will be appropriately investigated and where breaches are found, appropriate action will be taken. Suppliers operating in the EU must ensure compliance with the EU Whistleblower Directive (2019/1937/EU). Anyone who reports a genuine concern in good faith must not face retaliation of any kind.

5. REGENERATIVE AGRICULTURE AND ORGANIC STANDARDS

As a regenerative farm, Domaine de Graux holds itself and its suppliers to standards that go beyond compliance. This section sets out the specific expectations relating to regenerative and organic agricultural practices that distinguish our supply chain.

5.1 EU Organic Certification

Suppliers providing organic inputs, ingredients, or services connected to certified organic production at Domaine de Graux must hold, or operate in compliance with, EU Organic Regulation 2018/848/EU. Suppliers must maintain valid organic certification from an approved control body, keep full traceability records, and make these available for inspection on request.

Suppliers in organic transition are welcomed and will be supported. Such suppliers must demonstrate a credible transition plan and maintain separation between organic and non-organic produce throughout the supply chain.

5.2 Regenerative Practices

Domaine de Graux encourages suppliers to adopt or work towards the following regenerative principles in their own operations:

- **Soil carbon sequestration** through the use of compost, cover crops, agroforestry, and reduced or no-till practices.



- **Biodiversity integration** by maintaining or increasing on-farm biodiversity through hedgerows, wildflower margins, intercropping, and habitat corridors.
- **Closed-loop nutrient cycles** by prioritising the return of organic matter and on-farm nutrient management over the use of synthetic inputs.
- **Water-smart agriculture** through efficient irrigation, riparian buffers, and wetland preservation.
- **Agroforestry and silvopasture** where contextually appropriate, to increase ecological complexity and resilience.

Suppliers are encouraged to measure and report on soil organic matter, soil biodiversity indicators, on-farm carbon stocks, and other ecological metrics upon request.

5.3 Animal Welfare

Where suppliers provide animal products or services, they must comply with the EU's framework legislation on animal welfare (Council Directive 98/58/EC) and relevant species-specific regulations. Suppliers are expected to align with the Five Freedoms framework and to support ongoing improvement in animal welfare outcomes. Transport and slaughter conditions must meet or exceed all applicable EU standards.

5.4 Food Safety and Traceability

All suppliers providing food or feed products must comply with EU General Food Law (Regulation 178/2002/EC), implementing robust traceability from farm to fork (one step back, one step forward at minimum). Suppliers must have documented food safety management systems in place (either HACCP-based or certified under a GFSI-recognised scheme) and must cooperate fully with any food safety investigation or recall exercise initiated by Domaine de Graux.

6. AUDIT AND COMPLIANCE

Domaine de Graux reserves the right to confirm adherence to the principles set out in this Supplier Code of Conduct via on-site or desktop audits. If on-site audits are required, suppliers will be given sufficient advance notice and the audit will not unnecessarily disrupt operations. Domaine de Graux may engage a third-party audit firm where appropriate.

In line with the CSDDD (Directive 2024/1760/EU), suppliers are expected to cooperate in good faith with due diligence assessments conducted by or on behalf of Domaine de Graux, including providing access to relevant documentation, facilities, and personnel.

Where a supplier is found to be in breach of this Code, Domaine de Graux will work collaboratively with the supplier to develop and implement a remediation plan within a reasonable timeframe. Persistent or serious breaches may result in suspension or termination of the business relationship. Domaine de Graux is committed to providing reasonable support to suppliers, particularly small and medium-sized enterprises, in meeting these standards.

Suppliers are encouraged to undergo third-party sustainability audits or certifications and to share audit results with Domaine de Graux. Such certifications may reduce the frequency and scope of direct audits by Domaine de Graux.

Any questions? Contact us at: info@domaindegraux.be