

Our Code of Conduct

EJ Flomo Cocoa, a subsidiary of EbJel Flomo Legacy Enterprise, fully supports the [United Nations Framework and Guiding Principles on Business and Human Rights](#) (UNGPs), including labor rights, throughout its business activities. The guidelines expect companies to carry out due diligence to better prevent and mitigate potential human rights violations. As a minimum EJ Flomo Cocoa will prevent and mitigate the following potential human rights impacts:

1. Human Rights

Minimum Age for Employment

EJ Flomo Cocoa prohibits child labor and will strictly abide by ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labor. The ILO Convention 138 on the Minimum Age indicates that no child below 15 years (or 14 in certain developing countries) is allowed to work, subject to exceptions allowed by the ILO or national law. Liberia's Labour Law further states that children younger than 16 are prohibited from working during school hours, while those between 16-18 can engage in light work that is not harmful to their physical and moral development.

Forced Labour

EJ Flomo Cocoa will under no circumstances use, or in any other way benefit, from forced labor in line with ILO Convention No. 29 on Forced Labor and ILO Convention No. 105 on Abolition of Forced Labor. Forced labor refers to any form of indentured servitude such as the use of physical punishment, confinement, or threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits or deposits as a condition of employment.

Gender Equality and Women's Inclusion

EJ Flomo Cocoa commits to improving and empowering the position of women across our supply chain. We commit to adhering to the four key ILO gender equality Conventions including on Equal Remuneration (100), Discrimination (Employment and Occupation) (111), Workers with Family Responsibilities (156) and Maternity Protection (183). We recognize the important contribution of women in cocoa production and commit to meaningful inclusion not only because it results in better quality cocoa, but because it is the right thing to do.

Fair and Equal Treatment

EJ Flomo Cocoa will operate with dignity, respect and integrity in regards the treatment of our employees and outgrowers:

- EJ Flomo Cocoa will not discriminate in hiring, contracting and employment practices on the grounds of criteria such as of race, color, religion, gender, age, physical ability, national origin, sexual orientation, political affiliation, union

membership, medical tests, or marital status, in line with ILO Convention No. 111 on Discrimination.

- Any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment will not be tolerated.
- EJ Flomo Cocoa will respect the privacy rights of its employees whenever it gathers private information or implements employee monitoring practices.
- EJ Flomo Cocoa employs security personnel to provide security to safeguard its personnel and property and expects that security personnel will enforce the same standards on fair and equal treatment.

Employment Practices

EJ Flomo Cocoa will only employ workers who are legally authorized to work in our facilities. We will validate employees' eligibility to work through appropriate documentation. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice. To every extent possible, work performed must be on the basis of a recognized employment relationship established through Liberia's law and practice.

EJ Flomo Cocoa's outgrower farmers shall be offered an at-will contract and may withdraw their partnership for any reason and at any time after the transfer of their quota for cocoa beans in that season. Likewise, EJ Flomo Cocoa commits to mitigate potential threats to human rights, the environment, and/or the quality of cocoa that does not meet its standards and terminate the contract if and when correction cannot be made by the outgrower.

Freedom of Association and Collective Bargaining

EJ Flomo Cocoa shall grant its employees the right to Freedom of Association and Collective Bargaining in accordance with all applicable laws and regulations.

Working Time and Rest Days

EJ Flomo Cocoa will ensure that its employees and outgrowers work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours, and overtime hours, including for breaks, rest periods, holidays, and maternity and paternity leaves. In absence of law, EJ Flomo Cocoa will not require a regular work week over 60 hours, employees shall be allowed at least one day off after six consecutive days of work, and any overtime worked shall be voluntary and compensated at premium rate.

Wages and Benefits

EJ Flomo Cocoa's employees will be provided with wages and benefits that, at a minimum, comply with Liberia's laws or industry standards whichever is higher, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. In any event, wages will be enough to meet basic needs for employees, and their entitled official dependents, and to provide some discretionary income. EJ Flomo Cocoa will not apply disciplinary or any other forms of deductions from pay neither apply any forms of discrimination in employment and remuneration practices.

EJ Flomo Cocoa's outgrowers will be provided with fair wages for wet cocoa beans and/or properly processed dry beans per mutual agreement and premium wages when applicable from the sales of premium cocoa.

2. Environmental Sustainability

EJ Flomo Cocoa will comply with all applicable legal environmental requirements and demonstrate continual improvement of its environmental performance.

Cocoa Agroforestry

EJ Flomo Cocoa utilizes an agroforestry approach, understanding that a managed, intentional system of cocoa cultivation alongside other trees optimizes production, income, carbon storage, other environmental benefits and supply chain resilience. EJ Flomo Cocoa commits to maintain forestal areas and conserving biodiversity on the farmland. The cocoa trees and other crops are maintained without the use of inorganic nutrients, and sustainable crops are rotated to maintain soil fertility. No cocoa production occurs within Protected Areas or Proposed Protected Areas.

Environmental Permits and Reporting

EJ Flomo Cocoa will make sure that it obtains, keeps current, and follows the reporting guidelines of all the required environmental permits and registrations to be at any time legally compliant.

Environmental Management System

EJ Flomo Cocoa will document and implement a relevant environmental management system (based on international standards such as ISO 14001:2004), designed to identify, control and mitigate significant environmental impacts.

Hazardous Materials and Product Safety

EJ Flomo Cocoa will identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. All the applicable laws and regulations related to hazardous materials, chemicals and substances shall be strictly followed. EJ Flomo Cocoa will comply with material restrictions and product safety requirements set by applicable laws and regulations. EJ Flomo Cocoa will ensure that key employees are aware of and trained in product safety practices.

Resource Consumption, Pollution Prevention and Waste Minimization

EJ Flomo Cocoa will optimize its consumption of natural resources, including energy and water. EJ Flomo Cocoa will implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, EJ Flomo Cocoa will characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.

3. Health and Safety

EJ Flomo Cocoa's operating and management systems, as well as employees, will work in preventing work-related injuries and illnesses.

Workplace Environment

EJ Flomo Cocoa will provide its employees with a safe and healthy working environment. As a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation, and personal protective equipment must be provided together with equipped workstations. In addition, facilities will be constructed and maintained in accordance with the standards set by applicable laws and regulations.

Housing Conditions & Respect of Privacy

EJ Flomo Cocoa's dormitory facilities will be constructed and maintained in accordance with all applicable laws and regulations, and they will be clearly segregated from the factory and production area. All dormitory buildings will be clean and safe, and workers will be able to enter and leave the dormitory buildings freely at any hour. There will be clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. All dormitory facilities will also provide workers with reasonable personal space, adequate heat and ventilation and clean shower and bathrooms.

Emergency Preparedness

EJ Flomo Cocoa will be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. EJ Flomo Cocoa will regularly train employees on emergency planning, responsiveness as well as medical care.

4. Business Integrity

EJ Flomo Cocoa will comply with all applicable ethical trade laws and regulations in the countries where materials are sourced, produced and incorporated into the product ("country of use"). In case of services, the location of service delivery should prevail.

Recordkeeping and Transparency

EJ Flomo Cocoa will maintain transparent and up-to-date books and records to demonstrate compliance with applicable materials, services, governmental and industry regulations, and traceability. EJ Flomo Cocoa will demonstrate traceability from farmer to sale.

Origin

All cocoa supplied by EJ Flomo Cocoa is Liberian in origin, originating from the farm and surrounding area in Lofa County. EJ Flomo Cocoa will be capable of demonstrating (through paper and digital records) the origin of cocoa delivered to clients.

Anti-bribery

EJ Flomo Cocoa will never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third Party, whether public or private. EJ Flomo Cocoa will not pay or accept bribes, arrange or accept kickbacks and will not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations including the U.S. Foreign Corrupt Practices and the UK Bribery Acts.

Grievance Mechanisms

EJ Flomo Cocoa will have systems in place enabling anonymous grievances, reporting and management. A designated officer shall continuously monitor the grievance mechanism, keep records on the issues raised and take appropriate actions in a confidential manner.

Intellectual Property

EJ Flomo Cocoa will take appropriate steps to safeguard and maintain confidential and proprietary information of its business partners and use such information only for the purposes authorized for use by the contractual agreement.

Conflict of Interest

EJ Flomo Cocoa will report to its partner any situation that may appear as a conflict of interest.