

# **EC Holding Ltd. - Deforestation Policy**

#### 1. Introduction

Forests and ecosystems play a vital role in supporting the global environment, human livelihoods, and sustainable agriculture. The degradation and conversion of natural environments continue to accelerate climate change, contribute to greenhouse gas emissions, and lead to biodiversity loss — all of which have a significant impact on the world around us.

We recognize that agriculture and the food supply chain continue to be major drivers of deforestation and the degradation of natural environments. As a company that sources agricultural ingredients, EC Holding Ltd and all subsidiaries understands the important role we can play in preventing deforestation associated with agricultural commodities.

We are exploring global, regional and local ways to support initiatives aligned to a forest positive approach.

## 2. Who this policy applies to

This policy applies to everyone working with, for or on behalf of EC Holding Ltd and all subsidiaries, including without exception temporary and contract staff regardless of location, role or level of seniority.

## 3. Our Commitment

We are committed to conducting our business in a sustainable manner and in full compliance with all applicable environmental laws and regulations, while proactively working to minimize negative impacts and maximize opportunities to create positive environmental outcomes. EC Holding Ltd and all subsidiaries are aligned and committed to adherence with the Environmental Code of Kazakhstan.

We will continue to collaborate with our contracted suppliers across all key deforestation-linked commodities and geographies to enhance supply chain transparency, elevate sustainability standards, and support the preservation of the natural environment. For both direct and indirect purchases, our efforts will strengthen supply chain visibility and support more informed and responsible sourcing decisions where needed.

We are also committed to transparent reporting across our entire business and to ensuring that our supply chains are both environmentally and socially responsible.

### 4. How will we ensure commodities are Deforestation and Conversion Free (DCF)?

We will prioritize our actions based on four pillars:

- Buying certified products We will consider products to be DCF where they are certified to a robust standard where criteria prohibit deforestation and conversion. We maintain a list of the certifiable standards which we consider to be sufficiently robust. The list is available upon request.
- II. Sourcing from low-risk countries We will seek to buy products from low-risk areas and

regions where we can trace materials to a sourcing area where no deforestation has taken place since the relevant cut-off date. We will continue to monitor and regularly review our sourcing areas to ensure continued compliance, and to identify any risk of deforestation. Where sourcing is only possible in high-risk territories, suppliers must provide additional verification. The decision-making criteria relating to the use of a particular supplier should be recorded.

- III. Sourcing from suppliers that meet our enhanced due diligence requirements We will carry out an evidence-based risk assessment and conduct enhanced due diligence for all new and existing suppliers of the four major forest risk commodities identified. This may include site based third party audits and ensuring that the boundaries of production units are clear. We will monitor suppliers on an ongoing basis and aim to have a continuing dialogue around environmental performance. This includes the sharing of independently verified information in relation to DCF.
- IV. Reducing risk through a collective approach Whilst we expect our suppliers to have robust due diligence and responsible sourcing practices, we aim to support small and medium sized enterprises in our supply chains and understand that they do not always have the capacity and capabilities to fully address and mitigate risks. For this reason, beyond our responsible purchasing practices, we will assume a collective approach where we engage in industry-wide initiatives to leverage our buying power more effectively. This approach will also be applied for those areas where we do not have direct leverage such as our cocoa supply or soy used in feed. We will aim to identify potential engagements on a targeted basis where we consider that we may be able to encourage change and where we believe that collective action and collaboration will be influential in bringing about positive change across the industry. All these actions will empower us and our suppliers to improve supply chain transparency, raise sustainability standards and contribute to preserving our natural environment.

#### 5. Further information

This commitment sits alongside our existing policies, including the Code of Business Conduct, Supplier Code of Conduct, Environmental Policy and Business Integrity Policy. This Policy should be read in conjunction with those other policies. The principles within this policy are also reflected in our Supplier Code of Conduct which applies to all suppliers.

This commitment is part of our broader commitment to take strategic action to implement universal sustainability principles through our Supplier Code of Conduct.

In the event of breaches to this policy, we will engage with the relevant supplier to rectify any issues identified. If there is continued non-compliance or our concerns are not adequately addressed and resolved, we will consider whether the supplier should be removed from our supply chains.

We will review this policy regularly to ensure continued adherence to industry standards and legal requirements. EC Holding Ltd and all subsidiaries will review this policy on an annual basis to ensure that it continues to reflect the aims and aspirations of the organization. We will assess our progress regularly, and this will be reported through our annual report.

Michael Taylor General Director EC Holding Limited