

## Group Guiding Principles: Environment

Camellia Plc ("**Camellia**") is the ultimate holding company of a group of companies incorporated in various jurisdictions (the "**Group**"). Within the Group, Camellia has indirect interests in several entities which have responsibility for managing primarily agricultural operations, including responsibility for managing the assets and workers associated with those operations (the "**Operating Companies**"). The Operating Companies are predominantly based in Bangladesh, Brazil, India, Kenya, Malawi, South Africa, Tanzania and the UK. The majority of the Group's turnover is derived from the Operating Companies' work in the agricultural sector through the growing of tea, avocado, macadamia, rubber, blueberries, arable crops, forestry and livestock.

### **Governance and Strategy**

The Operating Companies possess the specialist knowledge, experience and expertise in relation to their own operations. It is the Operating Companies which best understand their own agricultural crops and livestock, the local geographical and climatic conditions, the local legal and regulatory framework with which they must comply and the local socio-political context in which they operate. Camellia is not an Operating Company and does not claim to possess such specialist local knowledge, experience or expertise. Having regard to this reality, Camellia's business philosophy is based on an approach which promotes a high degree of operational autonomy enjoyed by the Operating Companies.

Camellia expects the Operating Companies to adopt, comply with, and promote appropriately high standards in respect of their operations. Following engagement with the Operating Companies as to their existing practices and procedures and in line with Camellia's understanding of international guidelines, Camellia has formulated a series of 'Group Guiding Principles' ("**GGPs**") which outline the principles and commitments that Camellia expects the Operating Companies to adopt and adhere to in key areas such as human rights, modern slavery, financial crime, environment, quality, certification and traceability, employee wellbeing, health and safety and whistleblowing. Importantly, the GGPs set out the principles which Camellia expects Operating Companies to comply with at a minimum, subject to any local laws which would make it unlawful for the Operating Companies to do so, in which case Camellia expects the Operating Companies to respect and adhere to these principles to the greatest extent legally permissible. For the avoidance of doubt, nothing in the GGPs prevents an Operating Company from adopting a higher standard, whether in accordance with the requirements of local laws or otherwise having regard to the particular issues arising from their own operations.

Ultimately, the individual Operating Companies have the local expertise and understanding which means they are best placed to identify relevant needs and apply the processes and practices that enable them to operate legally, responsibly and ethically over the long term, and to embed the expectations set out in the GGPs into their own culture, strategy and daily practices. For the same reason, the Operating Companies are also best placed to implement and monitor compliance with the policies and practices that they put in place. This promotes the continuity, development and progressive growth of those individual enterprises in an ethical and responsible way that is relevant to, and supportive of, their own local jurisdictions and cultures.

### **The Principles**

The Operating Companies are responsible for the long-term health and sustainability of large landholdings around the world. Preserving the quality of the environment is critical for future generations and to preserving the long-term value of those Operating Companies' operations. Employing sustainable environmental management practices to preserve the long-term health of the land, the local environment and the water supply are core to the values that Camellia expects the Operating Companies to uphold. This underpins each Operating Company's licence to operate and is a foundation of the Operating Companies'

reputation. These GGPs set out the overarching principles underpinning Camellia's expectations of the Operating Companies regarding environmental matters.

Camellia accordingly expects the Operating Companies to:

- Know and comply with current applicable legislation of the countries in which they operate in relation to environmental matters.
- Have regard to their material environmental impacts in business planning and decision making.
- Identify opportunities to reduce their carbon footprint, including through reducing energy consumption, and align their businesses to the extent possible and appropriate with any national decarbonisation targets set by the country in which they operate.
- Be responsible custodians of the environment in which they operate and to take account of the fact that their operations may require natural resources and generate emissions and waste.
- Take reasonable actions to minimise their negative impacts on the environment by, for example, minimising the use of inorganic fertilisers, reducing the amount of packaging used for products, considering biodiversity and the generation and use of renewable energy.
- Consider opportunities to reduce water consumption and promote the efficient use of natural resources, for example through irrigation techniques and crop selection, in the relevant operations.
- Gather and evaluate data relevant to environmental performance, particularly in relation to energy and water consumption, waste generation and carbon footprint, to support improvements.
- Develop and implement environmental assessments with regards to potential adverse environmental effects.
- Be aware of upstream and downstream supply chain emissions and seek to engage with significant suppliers and customers to reduce environmental impacts, including transporting products efficiently to minimise logistics emission footprints.
- Seek to avoid environmental incidents and use effective emergency response procedures to minimise the impact of any incidents which do occur.
- Be a responsible neighbour that engages with the local community and other stakeholder groups to reduce any adverse environmental impacts.
- Engage, where appropriate, with government, civic leaders, and/or environmental groups.
- Consider adopting voluntary commitments in line with accepted internationally recognised good industry practices and management systems that are appropriate to their business to help reduce their environmental impact.

Each Operating Company is responsible for, within the above frame of reference, assessing, managing, and addressing the unique environmental risks as they arise in their own operations. This includes, but is not limited to, implementing adequate policies and procedures, conducting appropriate due diligence, acting on any findings and integrating the responses to these due diligence processes into their own policies and internal systems.

Operating Companies are expected to undertake and continue training of their relevant directors and employees and, where appropriate, suppliers to raise awareness of environmental issues and to assist in

identifying risks in their given businesses and supply chains.

Camellia expects that each Operating Company will undertake a regular, risk-based review of their compliance with their policies and procedures including, where necessary, using external expertise.

Any issues identified by any employee, officer, consultant, contractor, volunteer, intern, casual worker and agency worker with respect to these GGPs can and should be immediately notified to the appropriate point of contact at the relevant Operating Company and, where appropriate, in accordance with its whistleblowing and/or speak up policies.