

## Group Guiding Principles: Quality, Certification and Traceability

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

Quality, certification, and traceability are essential for ensuring customer satisfaction, compliance with standards, and transparency in operations. They help businesses meet legal and customer requirements, build trust, and maintain accountability throughout the supply chain and contribute to the overall efficiency, productivity, and reputation of a business. These GGPs set out the core principles which Camellia expects the Operating Companies to adhere to in respect of quality, certification and traceability matters.

At a minimum, Camellia expects the Operating Companies to:

- Adopt quality, certification and traceability measures that are most relevant to their own business,

including developing, implementing and monitoring policies and procedures which consider the actions below (where appropriate), in addition to other actions that they consider necessary:

- Complying with all internal and external product quality, safety and regulatory requirements.
- Ensuring a continued commitment to product quality, including high standards of hygiene in relation to cultivating, handling, storing, treating and processing products.
- Maintaining effective levels of product auditability, including relevant stock monitoring, inspections, controls, site visits and risk assessments as appropriate and required.
- Identifying, evaluating and controlling any specific hazards that are significant from a product quality and traceability perspective.
- Ensuring strict food safety and quality protocols covering all relevant manufacturing and processing systems.
- Setting out clearly defined roles and responsibilities for individuals within the relevant Operating Company who are tasked with monitoring and maintaining product quality and safety.
- Working with relevant suppliers to ensure appropriate quality and traceability systems for materials and ingredients that enable assessment of (amongst other risk factors) human rights, health and safety and environmental risks.
- Adopt, where appropriate, commitments in line with accepted internationally recognised good industry practices and management systems that are appropriate to their business to help ensure product quality, safety and traceability.
- Implement necessary systems and controls to ensure product safety, quality and compliance with all applicable legislation and certification standards.
- Know and comply with current applicable legislation of the countries in which they operate relating to quality, certification and traceability matters. This includes ensuring that the correct certifications, licenses and permits are in place in line with local law in the countries in which they operate and the countries to which they supply products and services (as appropriate).
- Represent clearly and accurately any information about quality, certification and/or traceability in all documentation.
- Understand and comply with supply chain due diligence legislation applying to the products and services manufactured and/or supplied, to ensure that the goods are being produced in such a way that will make them readily saleable in the markets to which they are being supplied.

Each Operating Company is responsible for, within the above frame of reference, assessing, managing, and addressing the unique quality, certification and traceability 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 quality, certification and traceability 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 GGP's 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.