

Sustainable Palm Oil Policy

Purpose and Scope

The Sustainable Palm oil policy applies to all oleochemical derivatives procured by the Galaxy group, which consists of Galaxy Surfactants Limited, Galaxy Chemicals Egypt (S.A.E.), and Tri-K Industries.

The policy outlines key agendas Galaxy is following to improve the sustainable palm oil supply chain.

Principle 1: NDPE

Galaxy's commitment to No Deforestation, No Peat Conversion and No Exploitation ensures that our palm oil supply chain does not contribute to destroying natural forests and converting peatlands after 31st December 2020.

Galaxy shall strive through its vendor partners to protect high conservation value (HCV) and high carbon stock (HCS) forests and promote sustainable agricultural practices that maintain forest cover and biodiversity.

Principle 2: Human Rights

Galaxy commits to respecting internationally recognized human rights ensuring our no-exploitation commitments.

This includes the rights of Indigenous Peoples, local communities, workers, and others who may be affected by Galaxy's activities.

Galaxy commits to respect,

- 2.1 No child labor.
- 2.2 No forced or compulsory labor.
- 2.3 Freedom of association and collective bargaining.
- 2.4 No discrimination.
- 2.5 No abusive practices or undue disciplinary procedures.
- 2.6 Legal and decent working hours.
- 2.7 Safe and Healthy Workplaces.
- 2.8 Living wages and fair benefits for workers.

Principle 3: Transparency and Traceability

- 3.1 Galaxy will ensure a process is in place, to know the origins and compliance status of raw materials in its oil palm supply chains.
- 3.2 Galaxy will conduct sufficient palm oil supply chain traceability and / or mapping to assess compliance with company commitments and other obligations at the supply base level.

Principle 4: Supplier Code of Conduct

- 4.1 Galaxy strives towards full compliance of its suppliers for adherence to the supplier's code of conduct

Principle 5: Supplier Evaluation and Engagement

- 5.1 Galaxy will evaluate suppliers periodically & engage with them for improvement via supplier sustainability program.
- 5.2 Galaxy will engage with all the suppliers annually through Galsustain program & exchange sustainable practices deployed & promote sustainability agendas.

Principle 6: - Grievance Mechanism

6.1 Galaxy will resolve all Complaints and Conflicts through an Open, Transparent, and Consultative Process through Grievance management process.

6.2 All grievances logged under the grievance procedure will be reported transparently.

Principle 7: - Smallholder Engagement

7.1 Galaxy shall strive toward taking measures to foster smallholder inclusion, support improvements in smallholder productivity and livelihoods, and provide resources to assist smallholders in meeting ethical supply chain requirements.

Principle 8: - Biodiversity, GHG, Water stewardship

8.1 Galaxy continues to strive towards maintaining biodiversity by allocating a specific portion of CSR funds for planting trees, and enriching biodiversity and will influence its suppliers for the same.

8.2 Galaxy shall prioritize the use of clean technologies and renewable sources of energy and fuels to minimize GHG emissions.

8.3 Galaxy to ensure water stewardship journey at its operation and supplier's site.

Principle 9: - Certification

9.1 Galaxy shall continue to comply with RSPO MB Certification and VDF certification requirements.

9.2 Galaxy shall comply with any new relevant requirement deemed fit for the business.

Principle 10: Goals – Time-bound action plan and reporting

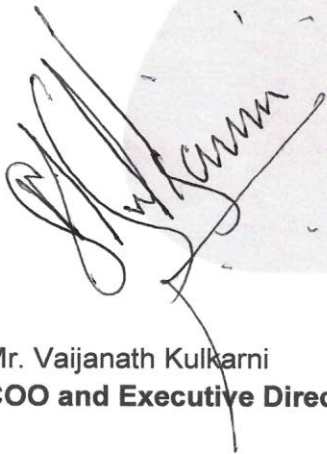
10.1 Galaxy is committed to achieve 100% traceability till the mill and plantation level by 2030.

10.2 Completion of 3 smallholder projects by 2030.

10.3 Galaxy will continue to report its progress related to the elimination of deforestation, conversion, and human rights abuses, oil palm traceability, annually via Sustainability Report, BRSR Report, RSPO- ACOP report, and CDP- Forest Disclosure.

Galaxy shall achieve this through a competent, committed, and well-coordinated team. Galaxy shall ensure adherence to the policy through appropriate systems and processes in place. The performance of the policy will be regularly monitored, evaluated, and reviewed by the Sustainability Process.

Galaxy's Sourcing Policy, Human Rights Policy, CSR Policy, SHE Policy, PE Policy, and Code of Conduct will complement the Sustainable Palm Oil Policy.



Mr. Vaijanath Kulkarni
COO and Executive Director



Mr. K. Natarajan
Managing Director and CEO
Effective Date: 5th December 2024
Revision No: 00
Format: F/SUS/GSC/GP-SPO policy