# **Human Rights Policy**



# Introduction

At Ingredion, we believe in the transformative power of people, nature, and technology to create ingredient solutions that enhance lives. Our commitment to human rights is integral to our purpose and values. We are dedicated to fostering a work environment that respects and promotes the dignity, well-being, and rights of all individuals involved in our operations and supply chain.

As a leading plant-based food ingredient company, we recognize our global responsibility to uphold the highest standards of human rights. Our standards are grounded in the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labor Organization Fundamental Principles and Rights at Work. As a signatory company of the United Nations Global Compact, we are committed to Human Rights across our supply chain.

## **Purpose and Scope**

Our Human Rights Policy outlines our commitment to human rights across our entire supply chain, including our employees, contractors, suppliers, and business partners. It applies to all locations where we operate and covers all activities conducted under our name. We are committed to ensuring that our practices, as well as those of our suppliers and partners, align with local laws, our values, and internationally recognized standards regarding human rights.

#### **Responsibility & Commitments**

#### Definition

We recognize the rights of our employees and those with whom we do business to be treated with dignity and respect, and in accordance with local laws and regulations. We expect our business partners to do the same. We will not tolerate the exploitation of children or the use of forced labor or human trafficking. Our respect for human rights means:

- Upholding the United Nations Guiding Principles on Business and Human Rights
- Performing appropriate due diligence on potential business partners
- Following our procurement policies when selecting new suppliers
- Paying fairly in the market and meeting or exceeding all legal requirements related to employee pay and benefits
- Respecting employees' rights to organize and bargain collectively
- Providing a workplace environment conducive to health, safety, and security
- Respecting the rights of Indigenous people
- Zero tolerance policy for threatening, abusive, or discriminative behavior

Advancing human rights at Ingredion is brought to life through our four fundamentals:

- Global Due Diligence & Policies
- Trainings, Awareness, and Internal Stakeholder Engagement
- Prevention & Remediation
- Customer & Supplier Engagement

## Governance

Ingredion's Chief Sustainability Officer (CSO) reports directly to the Chief Executive Officer and shepherds the execution of Ingredion's global sustainability program, including human rights. Numerous business teams are deeply involved in Ingredion's Sustainability and Human Rights program, including our Vice President of Corporate Sustainability reporting directly to the CSO, our Senior Director of Sustainable Sourcing reporting directly to our Vice President of Procurement, and our Vice President of Compliance, reporting directly to our Senior Vice President and Chief Legal Officer. Ingredion focuses its efforts through a dedicated Human Rights manager responsible for implementing our Human Rights program.

The implementation of Ingredion's Human Rights Policy is overseen by the ESG Executive Advisory Committee, which includes the Chief Human Resources Officer, the Chief Legal Officer & Chief Compliance Officer, Chief Operating Officer and Chief Commercial & Sustainability Officer, among other senior leaders.

## Framework and Awareness

Our human rights policy is embedded at a global level, in collaboration with local human rights policies, Ingredion's Code of Conduct, Ingredion's Supplier Code of Conduct and other programs and management systems.

We train our global workforce on human rights, leveraging the Ethical Trade Initiative's (ETI) Base Code which is founded on the conventions of the International Labor Organization (ILO). We imbed human rights within our supplier contracts via the Supplier Code of Conduct.

# **Due Diligence**

A core component of our Sustainability program is proactive management of human rights risks. Our global human rights program is supported by our Human Rights Management System, which is aligned with globally recognized human rights and ethical practice standards. We focus on 9 human rights risk factors within our management system to support Ingredion's values and Code.

We utilize a variety of tools such as <u>SEDEX</u> SMETA 4 pillar audits, <u>Ecovadis</u> assessments, and <u>Sustainable Agriculture Initiative</u> (SAI) Farm Sustainability Assessment (FSA) and on farm audits to identify, prevent, and remediate human rights risks within our supply chain.

#### Child Labor

At Ingredion we focus on the prevention and eradication of child labor within our supply chain. We do not hire young workers under the age of 15 and only employ young workers under the age of 18 and above the age of 15 in apprenticeships, where those workers exceed the local legal definition of

a child and where those children are working outside of school hours as defined by compulsory educational laws. We do not expose young workers to hazardous work environments.

# Forced or Compulsory Labor

We do not allow the use of forced or compulsory labor, including prison, wrongful confinement, and trafficked labor within our supply chain. We do not retain (hold) original identification papers to keep people at work and do not require employees to pay deposits to begin work. We do not withhold any employees' salary (or part of their salary) to force them to continue to do work under compulsion for the organization. However, withholdings will be made as required by law (e.g. payroll taxes, or by court order) and may be made at the employee's request (e.g. voluntary investment programs) and in accordance with local law.

All employees have the right to leave the workplace premises after completing a standard workday and are free to terminate their employment provided they give reasonable notice as per the terms and conditions of employment and in accordance with local laws.

# Freedom of Association and Right to Collective Bargaining

We respect the right, to the extent permitted by local law, that all employees have the right to form, join, and organize trade unions of their choice and to collectively bargain on their behalf. Ingredion informs employees of this right and shall inform personnel that they are free to join a worker organization without any negative consequence or retaliation. We expect our suppliers to do the same.

We do not allow union members or other worker representatives to be discriminated against, harassed, or intimidated.

# Discrimination

We do not engage in or support any forms of discrimination based on race, color, religion, age, gender, national origin, ancestry, handicap or disability (mental or physical), marital status, sexual orientation, veteran status, disability resulting from military service, union membership, political affiliation or any other classification protected by law or the company's policies.

Ingredion does not allow or tolerate any behavior that is threating, abusive, or otherwise discriminatory in the workplace. Where such behavior is identified, action is taken to resolve the matter.

#### **Disciplinary Practices**

We treat all people with dignity and respect. We do not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of personnel.

# Working Hours and Wages

We comply with all applicable local laws and any applicable collective bargaining agreements on working hours. We compensate all employees, inclusive of overtime, in accordance with legal requirements and any applicable collective bargaining agreement. We do not make deductions from wages for disciplinary purposes.

## Safety and Health

Ingredion will provide a workplace environment conducive to worker health, safety, and security and strives to prevent health and safety incidents and occupational injury or illness. Workers have access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage. Workers receive regular and recorded health and safety training.

All employees who are nursing mothers are permitted to take reasonable breaks to express breast milk and will be provided with a private and sanitary location to do so. All applicable local laws and regulations will be followed.

## Rights of Indigenous People

We conduct business with respect to the rights of indigenous people, particularly as it pertains to their land. We adhere to all local laws and regulations as they pertain to indigenous people. Where no local laws pertain, Ingredion seeks the advice of an expert (or experts) on any matters pertaining to land acquisition or other potential impacts to local indigenous members of the community.

## **Employee Responsibilities**

Ingredion employees have a crucial role in ensuring that human rights are respected throughout the supply chain. It is their responsibility to be fully aware of and understand the human rights issues that may arise when engaging with suppliers. This includes staying informed about the company's human rights policies, actively participating in training programs, and being vigilant in identifying potential risks.

With the support of Sustainability and the Business Integrity Team, employees must conduct thorough due diligence, including reviewing supplier practices, to ensure compliance with human rights standards. By fostering a culture of awareness and accountability, employees help uphold the Ingredion's commitment to ethical business practices and contribute to the protection of human rights globally.

#### Remediation

At Ingredion, we expect all employees to report violations of this Policy, and all laws and regulations. If they believe there's an indication or suggestion by our suppliers, business partners, agents, or other third parties of violating this Policy, or if they have suspicion that any such actions are being taken, they should speak up immediately.

All concerns can be reported anonymously by employees, suppliers, contractors, and the community at the Ingredion Business Ethics Line, available at <u>INGRethics.com</u>. Ingredion will not retaliate or permit retaliation for reports made in good faith.

## References

- Ingredion's Code of Conduct
- Ingredion's Supplier Code of Conduct
- Ingredion's Environmental, Health, Safety, and Sustainability Policy
- Canadian Forced Labor Report 2023
- <u>All Life Partner's Responsible Sourcing Program</u>
- <u>2023 Sustainability Report</u>