

Rabobank's position on Sugarcane

Rabobank Group

Our aim

Sustainability is one of the four core values of Rabobank Group, next to Respect, Integrity and Professionalism. We aim to contribute to the sustainable development of society in economic, social and ecological terms. In order to cope with risks related to global environmental change and resource scarcity, it is essential that supply chains become sustainable. Companies face a number of sustainability challenges. This implies that sustainable solutions need to be integrated in their daily business. Sustainable resource management will be key for the long term viability of their business. In our view sustainability is not an option but a condition for future prosperity. This implies that sustainability issues need to be integrated in daily business and that positive and negative impacts as a result of our clients' activities on society and on the environment throughout the supply chain need full consideration in our decision making processes.

Rabobank aims to positively affect the overall sustainability of the operations of our clients. Our clients in the sugarcane sector have to deal with sustainability issues in their business operations. We want to contribute to the realization of a sustainable sugarcane

supply chain by *client assessment* and *client engagement*. The assessment of how our clients deal with material issues will be guided by our Code of Conduct and the Sugarcane Supply Chain Policy we have drawn up for this specific purpose; the policy is a supplement to the CSR section of our credit manual. It has been designed to support sustainable practices, sustainability being defined in economic, social and ecological terms. The philosophy behind the policy is 'positive engagement' (meaning constructive dialogue) with clients to identify and resolve CSR issues, thus enabling Rabobank Group entities to positively influence clients in CSR issues and avoid any risks to Rabobank. So, the engagement idea is to solve CSR related problems in partnership with the client and to meet challenges for the future.

This approach will enable Rabobank to gradually exclude certain undesired operational practices and to motivate clients whenever possible to work towards realizing more sustainable business operations. The sugarcane policy embraces some binding conditions between the bank and the clients based on material issues we have determined in the sugarcane sector.

Scope of our Sugarcane supply chain policy

Our Sugarcane Supply Chain Policy applies to all commercial banking services such as credit facilities, project finance, advisory services and trade finance provided by Rabobank in the sugarcane sector. The policy provides conditions for upstream companies (sugarcane growers, harvesters and mills). Downstream companies (e.g. traders, processors, food & beverage industry, retailers) will be assessed on how they take their responsibility in the supply chain. Companies involved in sugarcane ethanol production will be assessed according to (1) their role in the sugarcane supply chain (upstream/downstream) and (2) the Rabobank Biofuel policy.

Simplified overview of the sugarcane supply chain



Material issues

Sugarcane is produced in different ways and under different circumstances. Rabobank acknowledges that sustainability issues vary accordingly and moreover that regional and local differences can occur, depending on the economic, environmental and social contexts in which sugarcane is produced. Taking this into account issues generally associated with sugarcane production, include:

- poor working and labour conditions;
- converting natural habitats into agricultural land resulting in loss of biodiversity;
- soil erosion and degradation;
- pollution of ground- and surface water;
- irresponsible use of fresh water, specifically in water-stressed environments;
- air pollution as a result of harvesting and processing activities.

Rabobank's 'conditions for investments' for upstream and downstream companies

Our Sugarcane Supply Chain Policy includes 'conditions for investments' for upstream and downstream companies based on the identified material issues as mentioned above. These conditions relate to (1) legality, (2) human rights, (3) prior consultation, (4) protection of preserved areas, (5) soil management, (6), water management (7) management practices and (8) social and environmental impact assessment.

Rabobank requests a company with regard to:

- **legality** to show the legality of its operations and comply with all applicable local, national and international ratified laws and regulations;
- **human rights** to work in accordance with the Human rights guidelines as described in the Human Rights policy of the Rabobank Group;¹
- **prior consultation** to involve affected stakeholders before establishing new operations (process of free, prior, and informed consultation);

¹ The Human Rights Policy is based on the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, as well as the four fundamental labour norms expressed in the core conventions of the International Labour Organisation (ILO)..

- **protection of preserved areas** not to operate in national or international legally-protected or preserved areas and areas containing globally, regionally or nationally significant concentrations of biodiversity values;
- **soil management** to use practices that maintain and enhance the structure and fertility of the soil and prevent erosion;
- **water management** to take adequate measures to safeguard the quality and quantity of ground- and surface water;
- **management practices** to adopt practices that avoid negative impacts on the environment;
- **social and environmental impact assessment (SEIA)** to undertake a SEIA prior to establishing new plantings or operations.

Rabobank believes that downstream companies play an important role in the sustainable sugarcane supply chain. The extent to which downstream companies can exercise influence on sustainability issues depends among other things on their role and their impact in the supply chain. Therefore, Rabobank recommends companies to have a purchasing policy in place that pays attention to the sustainability issues for sugarcane production and the conditions for investments as mentioned for the upstream companies.

Monitoring progress in sustainable management

Rabobank is aware that the process of implementing sustainable management standards and practices is challenging and takes time. We accept that some clients are more advanced than others, as long as clients are able to show significant progress in implementing environmentally and socially responsible management practices and responsible purchasing. If we have reason to believe the client does not comply with the abovementioned conditions or shows insufficient progress in integrating sustainability measures in daily operations, we will engage with the client to achieve the desired improvements within an arranged time frame.

Engagement practices to contribute to improvements

There is no single, globally applicable sustainable management solution. As issues can vary widely from one region to another, improvements towards sustainability can vary accordingly. Nonetheless, sustainability principles can be applied across different regions and climates. Rabobank is convinced that a sustainable sugarcane

industry can be achieved through the use of new technologies and improved management techniques in combination with attention being paid to working and labour conditions. Rabobank chooses therefore to adopt an active and positive engagement approach to contribute to improvements in the sector.

For example, we will encourage upstream companies to be *transparent* on their current production and their plans to increase the production of sustainable produced sugarcane (such as BSI) or downstream companies to be transparent on the current sourcing and plans to increase sourcing of sustainable produced sugarcane among other things.

We will also encourage companies to deploy *good practices* such as - among other things - setting up a track and trace system to identify sustainably sourced sugarcane, adopting good agricultural, social and environmental management practices, which enhance biodiversity and soil conservation, the maintenance of water quality, safe and healthy working conditions and stimulate yield enhancement, or improving the livelihood, yield and sustainability performance of local communities.

Disclaimer

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