



Bunge Certification Program for Sustainable Agricultural Sourcing

v.2023.1



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1. INTRODUCTION TO PRO-S

Bunge is a leading agribusiness and food company with integrated global operations. We aim to bring products from where they are grown to where they are processed to where they are consumed in a safe and sustainable way.

The company strives to promote sustainable agriculture and implement robust projects that protect and improve the environment, while supporting the social and economic well-being of growers, employees and local communities. Bunge operates with sourcing standards to secure best practices in its supply chain and Sustainable Sourcing is one the core pillars of our global sustainability platform. The platform also comprises Action on Climate and Accountability. Learn more about our sustainability strategy at www.bunge.com/sustainability.

As stated in the Land Use and Biodiversity Policy, Bunge is ready to comply with market certification if demanded and compensated by customers. The PRO-S certification program was created in 2012, based on stakeholders consultation from 2009 to 2012 and is intended to leverage the assurance on sustainable criteria, as per market trends. Stakeholder consultation enhanced the standard in 2015, 2019, 2021 and 2023, as the standard is committed to the continuous improvement and applicability to market dynamics. It remains, though, based on criteria that include the following assurance and possibilities to customers:

- Geographic approach: sourcing from regions of preference.
- Farm traceability: each tonnage of product is connected to a farm of origin in Bunge's sourcing.
- Forest footprint: no sourcing from farms that deforested or converted primary native vegetation later than June 2016.
- Labor compliance in Primary Suppliers' farms: no association to degrading conditions for field workers, as well as child labor or discrimination.
- No relation to illegal activities with environmental impact.
- Risk analysis for sensitive issues.
- Commitment to continuous improvement.
- Use of chemical inputs in compliance to legislation.

The standard is only applicable to agricultural commodities and its derivatives sold directly by Bunge to its customers, there is no chain of custody applicable downstream. PRO-S is based on mass balance (MB) control under Bunge's management and its operating companies, being it area/country MB or (group or site level) MB. The mass balance demands physical flow of product among Bunge's operating companies. Annual inspection by third party applies for mass balance validation and transparency of the program. The flow may be segregated if demanded by local markets, being such protocol additional and compliant to local authorities / customers requirements.

The PRO-S system brings the set of indicators that better fit current demands from stakeholders and markets. The principles and criteria follow FEFAC's (European Feed Manufacturers' Associations) Soy Sourcing Guidelines. PRO-S is a global program, primarily focused on agricultural sourcing from Brazil. Some indicators may not apply equally in other countries where some of the topics are not material. The supply of socially responsible and environmentally sustainable agricultural commodities which lead to a certification of good origin has been possible due to Bunge's operational model that includes characteristics as:

- Integrated company
- Large scope of suppliers
- Strong sourcing footprint
- Internal controls
- Public disclosure with robust reporting experience
- Partnerships in the field and internal management
- Stakeholder consultation in compliance to AA1000 standards



The PRO-S certification complies, as a basic feature, to the following sustainability related policies implemented by Bunge, with extra elements when applicable (see Principles & Criteria Chapter):

BUNGE'S SUSTAINABILITY POLICY

Bunge is committed to sustainable development and adheres to the following principles:

- We strive to be good citizens by contributing to the economic and social development of the communities where we work;
- We work to achieve a high level of environmental performance by adopting science-based, culturally sensitive and pragmatic best practices and by promoting these practices within our supply chain;
- We partner with companies and organizations to promote and apply sustainable practices; and
- We communicate openly about our activities and maintain a constructive dialogue with stakeholders.

We apply these principles across our operations, pursuing both global and regional goals.

LAND USE AND BIODIVERSITY POLICY

Improve measurement and insights

Bunge is aware of its responsibility due to sourcing activities and impacts on biodiversity and land use, and supports the efficient use of natural resources to provide the quantity and quality of food and feed to meet global needs.

Ensure marketability of products

The company targets the acceptable standard of forest use that guarantees availability of land for agricultural production, in compliance with local legislation and in consideration of Bunge standards.

Ensure strategic readiness for standards

The company will be ready to comply with market certification if demanded and compensated by customers.

Promote best practices

Bunge believes that identifying and communicating best practices among its suppliers, including the recovery of degraded land, is key for promoting sustainability.

Broad solutions and local people

Bunge encourages the execution of Ecosystem Services that lead to a social and environmental enhancement in the communities where we operate. The company recognizes the right of small holders and indigenous people to a proper livelihood and supports their participation in the business, promoting social responsibility and compliance with best practices approved by official bodies.

Biotech and biofuels

Bunge will support research and the adoption of Technologies that encourage sustainable agricultural practices. The company considers that biotechnology, when appropriately applied, may be a tool to improve output while



diminishing the use of scarce natural resources, such as water, land and nutrients. Bunge supports the development of a global biofuels industry built on the principles of sustainable production and consumption, balancing the demands of food, feed, fuel and fiber.

COMMITMENT TO SUSTAINABLE VALUE CHAINS: GRAINS & OILSEEDS

Bunge’s vision is to build 21st century value chains that are integrated from farm to consumer, traceable and verifiable and which make a positive impact on the ground. Our company is committed to applying policies that reflect this vision across our businesses and supply chains, and to collaborating with stakeholders and other value chain participants—from farmers to consumers—to realize them at scale.

Grains & Oilseeds Commitments & Practices

In our Grains & Oilseeds value chains, Bunge commits to:

- achieve deforestation-free supply chains worldwide in 2025, considering both direct and indirect sourcing, and applying to native vegetation conversion in the appropriate geographies, reconciling production with environmental, economic and social interests,
- employ science-based definitions and cutoff dates for deforestation and native vegetation conversion determined by a credible multi-stakeholder process,
- apply these criteria to our supply chains, in addition to minimum standards of legal compliance,
- respect human rights and indigenous community rights, and apply free, prior and informed consent for land purchases and use,
- enhance traceability to farm and transparency overall,
- ensure respect for legally protected areas,
- publicly disclose progress on our efforts,
- engage in open and productive dialogue with stakeholders.

Bunge’s existing global labor policy prohibits forced and child labor and protects freedom of association.



PRO-S CERTIFICATION PRINCIPLES & CRITERIA

The PRO-S certification is available upon previous request from customer and subject to commercial agreement. It represents a differential in trading due to traceability connecting to farm of origin.

Certification is based on third party verification at the farm level as presented in the Verification Chapter, and only applies over products sold by Bunge’s operating companies to their customer. Sales of certified products by Bunge respect the ratio factor portion over original grains is subject to auditing.

The indicators for compliance were updated and are based on FEFAC’s (European Feed Manufacturers’ Associations) Soy Sourcing Guidelines. The flow of certified product is guaranteed by a mass balance control among Bunge’s operating companies and necessarily connected to a farm of origin. The Principles explained below are applicable to the sourcing of grains and will guarantee that derived products sold by Bunge are in compliance with the FEFAC Guidelines.

PRINCIPLE 1: Farmers Operate in Legal Compliance

<i>Criterion 1.1</i> Farmers must be aware of applicable legislations and need to be engaged with full compliance, presenting verifiable documentation.		Degree of Obligation
1.	Awareness of responsibilities according to applicable laws can be demonstrated.	Immediately
2.	Process to law compliance are in place	Immediately

PRINCIPLE 2: Land Use Rights and Community Relations are Well Defined

<i>Criterion 2.1</i> Legal use rights to the land are clearly defined and demonstrable.		Degree of Obligation
3.	There is documented / notarized evidence of rights to use the land, such as legal ownership or lease agreement or rights provided by an official court.	Immediately

<i>Criterion 2.2</i> No disputes with traditional populations are in place.		Degree of Obligation
4.	Producing farms may not be subject to dispute due to land demarcation in favor of traditional populations nor promote land conversion in such areas.	Immediately
5.	If any study is in place for land rights, producing farms may only be certified under free, prior consent from the other party.	Immediately

<i>Criterion 2.3</i> Protection of Community relations, including employee community.		Degree of Obligation
6.	Records of any documented evidence of complaints and grievances shall be kept. The complaint mechanism is known by and accessible to local communities.	Immediately



7.	In case a relevant competent authority requires the farmer to react to a complaint or grievance in a certain way, the farmer will do so in timely manner. The complaint mechanism (e.g. written complaint form, being accessible via email, phone or written post) is transparent, has been made known and is available to all workers, local communities and traditional land users	Immediately
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PRINCIPLE 3: Farm Working Conditions Respect Employees Needs

<i>Criterion 3.1</i>		Degree of Obligation
Fight against child labor, forced labor, discrimination and harassment		
8.	Farmers do not use forced, compulsory, bonded, trafficked or otherwise involuntary labor in any of farm operation. Worker’s rights policy is available.	Immediately
9.	Children under 15 (or a higher age as established in national law) do not carry out productive work. Young workers (15-18) must not undertake hazardous work that jeopardizes their health and welfare, including by interfering with their education.	Immediately
10.	There is no engagement in, support for, or tolerance of any form of discrimination against workers.	Immediately
11.	Workers are not subject to corporal punishment, mental or physical oppression or coercion, verbal or physical abuse, sexual harassment or any kind of intimidation.	Immediately
12.	Workers are free to leave their job if wanted, and none of their identity papers is retained by employer at any time, unless demanded by law.	Immediately
13.	No worker is submitted to more than 48 regular hours of work per week (overtime not included) and work time is in compliance with local laws.	Immediately
14.	Overtime is always voluntary and should be paid in accordance to local and national laws or sector agreements.	Immediately
15.	Overtime in excess of 12 hours per week is only allowable if it happens in extraordinary, limited periods where there are time constraints or risks of economic loss and where conditions regarding overtime in excess of 12 hours per week have been agreed between workers and management.	Within one year
16.	All workers receive equal remuneration for work of equal value, equal access to training and benefits and equal opportunities for promotion and for filling all available positions.	Within one year

<i>Criterion 3.2</i>		Degree of Obligation
A safe and healthy workplace is provided for all workers.		
17.	Workers have full access to drinking water and basic sanitary facilities	Immediately
18.	Potentially hazardous tasks are only carried out by capable and competent, trained people.	Immediately
19.	Workers receive adequate safety gear for any activity executed.	Immediately
20.	Medical treatment / first aid shall be promptly provided and all permanent / fieldworks have first aid kits.	Immediately



21.	There are training sessions in place for all new workers regarding safety and if health or safety risks are identified there is monitoring and training to mitigate frequency.	Within one year
22.	Workers that do not engage in safety requirements are subject to warnings and legally-permitted sanctions.	Within one year
23.	Accident and emergency procedures exist and instructions are clearly understood by all workers.	Within one year

<i>Criterion 3.3</i> Freedom of association and the right of collective bargaining for all workers.		Degree of Obligation
24.	Workers are free to establish and / or join an organization of choice.	Immediately
25.	All workers have the right to perform collective bargaining.	Immediately
26.	The effective functioning of such organizations is not impeded. Representatives are not subject to discrimination and have access to their members in the workplace on request.	Immediately

<i>Criterion 3.4</i> Fair remuneration to all workers directly or indirectly employed as established by local law and industry agreements.		Degree of Obligation
27.	Gross wages comply with national legislation and sector agreements.	Immediately
28.	All workers have a written contract valid in accordance to local labor law and employer keeps records of all wages.	Immediately
29.	As per legislation, working hours and overtime are monitored.	Within one year
30.	Deductions from wages for disciplinary purposes or for non-authorized items are not made, unless legally permitted. Wages paid are recorded by the employer.	Immediately

PRINCIPLE 4: Environmental Responsibility in Sourcing Farm

<i>Criterion 4.1</i> Agriculture expansion considers environmentally based criteria		Degree of Obligation
31.	Farmer complies with environmental legislation in place and verifiable documentation exists.	Immediately
32.	Farmers must set aside area for biological reserve inside the farm or in a compensation area, respecting regulations by local law. Land clearing must comply with local legislation and agricultural expansion must follow arable areas already in use, as per use of tools such as Agroideal.org.	Immediately
33.	There is no conversion of primary native vegetation after the cut-off date of June 2016 for the certified crop, being such primary native vegetation natural forests, native grasslands, wetlands, swamps, peatlands, savannas, steep slopes and riparian areas. Verification is subject to satellite image monitoring under resolution of 30 m by 30 m.	Immediately
34.	Bunge's Land Use and Biodiversity Policy states that the main objective is to supports the efficient use of natural resources to provide the quantity and quality of food and feed to meet global needs. No crops shall be produced on land that is illegally deforested after a certain cut-off date mentioned in	Immediately



	national legislation (e.g. 2008 in Brazil), nor over area cleared after June 2008 in the Amazon Biome (Amazon Moratorium).	
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<i>Criterion 4.2</i> Production waste is managed responsibly.		Degree of Obligation
35.	There is adequate storage and disposal of fuel, batteries, tires, lubricants, sewage and other waste in accordance with national legislation.	Immediately
36.	Any burning of residue is only possible if mandatory by national legislation as a sanitary measure.	Immediately
37.	Farm must present plan to reduce or recycle waste as much as possible.	Immediately

<i>Criterion 4.3</i> Efforts are made to reduce the use of fossil fuels.		Degree of Obligation
38.	Use of fossil fuels is monitored.	Within one year
39.	Farm must present efforts to reduce fossil fuels.	Immediately

PRINCIPLE 5: Best Agricultural Practices in Place

<i>Criterion 5.1</i> The quality and supply of surface and ground water is maintained or improved.		Degree of Obligation
40.	Good agricultural practices are in place to diminish any impacts on surface or ground water (no tillage, terrace, water treatment, etc). When irrigation is used, relevant legislation is being complied with and measures are taken to minimize water use.	Immediately
41.	Farmer is able to monitor and control any spills that could impact in water sourcing for surrounding communities. There are procedures to communicate to local authorities.	Immediately
42.	Water bodies must be preserved with vegetation alongside rivers for water quality matters. If not in place, plans for such reforestation must be presented.	Within two years
43.	There is monitoring, appropriate to scale, to demonstrate that these practices to protect water quality are effective.	Within one year

<i>Criterion 5.2</i> Soil quality is maintained or improved and measures are taken to avoid erosion.		Degree of Obligation
44.	Farmers must protect the soil fertility and quality as means to sustain their production. Best practices must be in place to avoid erosion and permit proper water retention / aeration of arable land, as well as increase of organic matter due to carbon sequestration (i.e. no tillage, terrace, crop rotation, precision farming and others applicable locally).	Immediately



45.	Farmers must proof the usage of best practices and a plan of soil conservation for agricultural sites. Soil quality and productivity must be monitored seasonably with soil sample testing.	Immediately
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<i>Criterion 5.3</i> Agrochemicals listed in the Stockholm and Rotterdam Convention are not used and all application of agrochemicals is in accordance with best practices.		Degree of Obligation
46.	There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.	Immediately
47.	Farmers must keep record of agrochemicals used and all of the active ingredient must be in compliance with local regulations.	Immediately
48.	Farmers must monitor active ingredient usage in agrochemical aiming at continuous decrease of dosage when possible.	Within one year
49.	The agrochemicals usage must strictly follow guidelines of manufactures. The usage must follow agronomic recommendation of a technician in charge. There should be no use of pesticides within 30 meters of populated areas or water bodies.	Immediately
50.	Implementation of an 'Integrated Pest Management Plan or Strategy', in order to avoid over-dosage and make the best use of natural pest control mechanisms. Use of chemicals or other technologies must respect the infestation rate as per each of the pests being controlled, minimizing impacts over biodiversity and animal / human health.	Immediately
51.	Aerial application of pesticides shall not impact populated areas. Aerial application is preceded by notification to residents within 500 m (or more when as such prescribed in national legislation) of the planned application. There is no aerial application of pesticides in WHO Class Ia, Ib and II within 500 m (or more when as such prescribed in national legislation) of populated areas or water bodies.	Immediately

<i>Criterion 5.4</i> Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized Integrated Crop Management Techniques.		Degree of Obligation
52.	The usage of chemicals must be in accordance to best agronomic practices to avoid environmental contamination and the manufacturer's recommendation to prevent resistance must be followed for weeds and harmful insects. It must be under supervision of a trained technician. When usage is needed, employee must use safety gear as per recommendation.	Immediately
53.	Pests are monitored to avoid its spread over other areas.	Within one year
54.	Crop diversification is mandatory on farm.	Within one year



55.	Chemicals must be stored properly, safe from sun and weather conditions. The storage must be safe from non authorized people and be isolated from direct contact to soil. All chemicals shall be handled under supervision of technician in charge and must be fully identified in their original package, as well as with first aid instructions.	Immediately
56.	The disposal of chemicals and its packages must follow local regulation. Any activity must be under supervision of a trained technician that will guide how to proceed in order to avoid soil or water contamination, as well as health issues due to residues or misuse.	Immediately

VERIFICATION & TRACEABILITY

The verification system for Bunge’s PRO-S Certification program is based on 3rd party verification, which is an independent party that conducts the audits and issues certificates stating that the product complies with the given specific set of criteria, in accordance to FEAC’s guidelines. PRO-S aims at adherence to such guidelines and thus may be also applied over grains or meal originated from grains under other standards compliant with FEAC Guidelines, including those approved by the European Renewable Directive. The equivalency on origination is unilateral and features not presented in the PRO-S will be dismissed from its commercialization claims. Such equivalency on origination is only applicable when directly originated by Bunge from farmers, keeping thus the record of deforestation free traceability to farm. The traded goods , handled as deforestation-free products within the scope of this guideline are traceable including the applied supply chain. Maps of certified farms are kept by Bunge and may be offered to customers under confidentiality of the added-on service AceTrack by Bunge.

The verification over PRO-S certified farms includes audits of an accredited certification/inspection body, on Bunge’s expense, to check compliance with the sustainability program. Leading principles are:

- Effectiveness
- Efficiency
- Impartiality
- Transparency
- Risk based
- Rigor

The verification system is based on credible 3rd parties hired by Bunge for such task and shall include:

- Written procedure for sampling and audit frequency every three years, based on risk assessment of participating farmer
- Procedures for dealing with non-conformities (e.g. for criteria that need to be met within one year)
- Accessible complaints mechanism towards the standard owners



- Documentation about the verification procedures accessible to external parties
- Procedures for sharing the results of the verification activity with the verified operator

The criteria to select 3rd parties for the verification are:

- The third party accredited based on ISO 17021 and / or ISO 17065
- The third party is accredited by a national accreditation party affiliated to the International Accreditation Forum (IAF) or in compliance with ISO 17011: 2004
- The auditors/inspectors ensures to be impartial, qualified on environmental and social matters of the sector, and competent. The auditors have the knowledge to carry out certification audits in the specific sector. Auditors participate in frequent trainings and/or at least a training whenever the standard is revised. The auditors have knowledge regarding the Bunge Pro S Standard and are able to demonstrate audit experience in the relevant sector. Certification body shall have their own, accessible grievance mechanism.
- For approval of auditors it is possible to carry out a parallel audit to verify the method by which an audit is planned, executed and reported through the Certification Body. The parallel audit will take place after the audit has been carried out through the Certification.

Inspection Scope and Sampling

The scheme is open to all applicants farmers. Verification procedures may be performed in groups of farms or farm-by-farm.

- **Group of farms:** A group of farmers with similar characteristics (same country, biome) can become certified as a group. All farmers comply with all criteria from the BUNGE PRO-S standard and there is a farm group leader who makes sure all farmers do indeed comply with the criteria. This farm group leader collects all necessary information of the group members and is the contact person in case of complaints or questions. The independent third party will check the robustness of the internal control system and audits a sample of farmers, based on the sampling methodology described below and the risk level of the group. When the internal control system is not robust or when there are severe major non-conformities in the sample, all farmers will be individually audited.
- **Regular individual farms:** the individual farms must be classified according to their risk assessment, in one of the three risk levels. The third party verification body shall apply the sampling procedure to determine how many farms must be verified in each risk level. Farmers will receive their own auditing report.

The risk level of each farm or group of farms must be determined by the third party verification body, considering at least the 5 (five) following aspects:

- Proximity to and/or overlap with biological sensitive areas (forest land, peat land, wetlands, natural reserves, etc.);
- Land conversion shortly before or after July 2008 (enforcement of Brazilian legislation to get any new deforestation with legal papers);
- Proximity to recent deforestation of any kind;

- Factors influencing significantly the output per acreage and the output per ha.
- Proximity to environmental reserves, indigenous land and or farmland being disputed by traditional population.

The sampling methodology must consider the risk level:

- low risk: $s = \sqrt{n} \times 1.0$
- medium risk: $s = \sqrt{n} \times 1.3$
- high risk: $s = \sqrt{n} \times 1.5$

Self-Monitoring

The scheme participants (or Farmer) can carry out their own inspection. These own survey inspections are based on the publicly available PRO-S guidelines. The inspections will analyze the verifiable criteria of which underly claims made by certification schemes.

Group specific requirements

The verification process shall include a visit to the group leader in order to verify the internal control system and relevant procedures to make sure all farmers comply with the standards criteria.

If applicable, the farmers in the group may choose to share information and work together to meet environmental and social requirements. In this way they may save (certification) costs and share best practices. The group leader collects and stores the relevant information about all operations of all farmers.

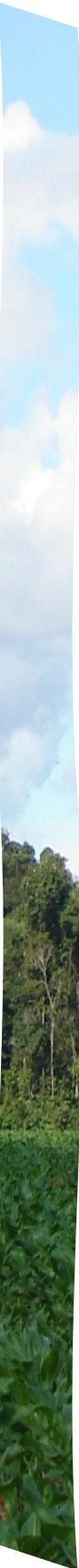
Farmers can apply for group certification when the following criteria are met:

- Any group members may be verified, regardless of size or production, according to the sampling methodology applied inside a given group;
- All members must be in the same country, within the same ecological region and close to each other;
- In a group, the members shall use similar production systems, such as organic production, no-till farming, or non-GMO.

Timing

After the first third party verification, the individual farm or group of farms shall be re-verified every third year. In case of group of farms, the sampling methodology shall be applied once again.

The full auditing procedure is the same. The farmers must be aware that a third-party verification will occur. All participant farmers are subject to continuous monitoring in terms of labor conditions and illegal logging. All participant farms are subject to satellite monitoring, annually, to check new deforestation or conversion for crop growing, which would exclude farm from participation in the PRO-S program. Illegal logging, inclusion on modern slavery employer public list or land dispute with traditional population are also exclusion criteria for the certification. Such annual monitoring is performed by service provider selected by Bunge. Bunge reserves the right



of extra monitoring at any time, using internal capabilities and public resources such as, but not limited to, Prodes Cerrado or Prodes Amazon in Brazil, MapaBiomass Chaco for Argentina, Commodity Forest Watch / Global Forest Watch, and Agroideal for sustainable expansion. Results on approved farms are subject to unannounced 3rd party auditing.

Bunge controls over monitoring and mass balance will happen every two years by the external verification body.

Non-conformities

There are two levels of non-conformities that can be appointed by the auditors: major and minor. The level is linked to each sustainable criteria and is based on the relevance of the non-conformity.

- Major Non-Conformity: must be addressed within 60 days, through the implementation of an action plan approved by the auditors;
- Minor Non-Conformity: must be addressed within 6 months, through the implementation of an action plan approved by the auditors once it relates to some unusual, temporary error with minor implications in the farm management;

In the case of group of farmers, a verified non-compliant member will be suspended in the certification until meeting again all criteria. The group will be only terminated, and farms will be considered as regular individual farms, if the non-compliant member is the leader of the group.

Reporting

The verification report shall describe all the sustainability criteria inspected regarding the sites and the documentation assessed. The assessment findings and conclusions must be shared with the farmers and with Bunge management for knowledge and alignment.

The report shall contain all the non-conformities identified and the action plans with a timeline of implementation. Auditing reports shall be stored for at least 5 years.

Complaints and notification

Bunge is responsible for receiving potential complaints and appeals from the farmer or other stakeholders at sustainability@bunge.com or through its other public communication channels (including 800 lines) and forwarding them to the third party inspection body. Any Crisis Management will be carried out by sustainability@bunge.com and any critical incidents such as such as nonconformities in the sourcing, production, or marketing of deforestation-free products; or occurrences related to deforestation-free certified products will be primarily informed immediately to certification bodies. For this purpose, the incident, probable causes as well as planned and implemented measures must be described in a paper of incident. The company will draw up a communication plan for the event, which will be kept up to date and verified at least every 12 months.

