

SOCOTAB

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Title	EXTREME BREACH PROCEDURE		Page 1 of 7
Document Type	Group Sustainability Policy	Document No	
Revision No	1	Valid From	June 2024
Compiled by	Group Sustainability Committee	Approved by	Socotab Frana

1. DEFINITION	Extreme breaches are defined as situations where there is a severe risk to life, limb, or liberty of the individual rights holder through intentional actions of others. These breaches predominantly relate to forced labor, slavery, human trafficking, severe and systematic abuse, and worst forms of child labor.
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2. PURPOSE	To define and document the process of taking action for the issues that are categorized as Extreme Breaches, with a view to ensuring transparent and effective management of such issues, and to assigning concrete action to a specific person in charge of performing the necessary actions until they are resolved, and the final resolution is issued.
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3. SCOPE	Identifying, managing, and resolving issues that are categorized as Extreme Breaches. The instruction covers all issues emerging during working activities on the farm.
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4. TERMS AND ABBREVIATIONS	EBI – Extreme Breach Issues. Local Sustainability Team – General Manager, Finance and Administration Manager, Human Resource Manager, Production Manager, Leaf and Agronomy Manager, Operational Compliance and Safety Manager, Commercial Service Manager.
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5. RELATED CODES	<ul style="list-style-type: none">• ALP Code.• List of Identified Extreme Breaches on the farm.
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6. RECORDS	<ul style="list-style-type: none">• Extreme Breach Notification Form.
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7. ACTIVITY DESCRIPTION	<p>7.1 RESPONSIBILITIES</p> <p>ALP Coordinator is responsible for training field staff on the process of Extreme Breaches and verifying their in-depth understanding, so that they are properly equipped to manage its correct implementation with all required parties.</p> <p>It is also the responsibility of the ALP Coordinator to ensure all necessary information has been gathered / recorded in the Extreme Breach Notification Form and circulated by email to ensure all related parties have been informed and understand their duties.</p> <p>Leaf Technician is responsible for identifying the Extreme Breach Issues on farms, as well as implementing the action plans as concluded in the Extreme Breach Notification Form where required.</p> <p>Local Sustainability Team is responsible for providing guidance, allocating appropriate resources, verifying and validating priorities and action plans to address Extreme Breach Issues, and engaging with external stakeholders. Top Management oversees reviewing escalated issues, determining alternatives, and agreeing on the final decision to solve the issue.</p> <p>7.2 PROCESS</p> <p>The Issue and Action Item management process consists of six steps:</p>
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7.3 IDENTIFICATION

Issue identification occurs during farm visits. The LTS inspects all parts of the field and pays special attention to a potential Extreme Breach Issue that needs to be addressed, based on the definitions of EBIs.

Examples of pre-defined EBIs, but not limited to:

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- Children hired below the age of 15.
- Sexual abuse.

- Slavery.
- Human trafficking.

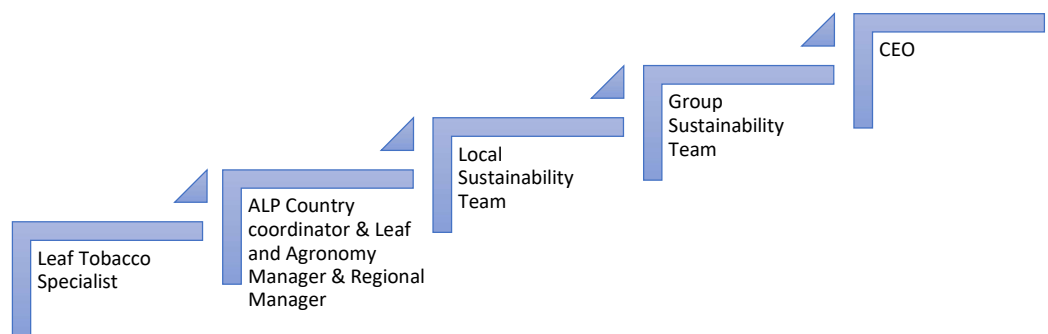
7.4 VALIDATION AND PRIORITIZATION

Even though the protection of the individual under duress is the primary goal, during the validation phase the LTS should collect all available information and not confront the perpetrator under any circumstances. The primary reasons being that he/she may be part of a criminal activity, be a danger to the technician or put the individual at further risk of danger to life, limb, or liberty.

7.5 ESCALATION

In suspected EBI cases, which usually involve legal criminal situations, the LTS should first call the ALP Coordinator to present the suspicious situation. If the situation is identified as an Extreme Breach, the ALP Coordinator will help the LTS to enter the preliminary information he/she has collected into the **EBI form, within the first 6 hours** of learning of the incident.

The ALP Coordinator is responsible for following up on the EBI case and reporting it directly to higher management, **within 72 hours** and by following the hierarchy below:



7.6 TRACKING AND REPORTING

The plan of action to be implemented will be proposed by the Local Sustainability Team, but contribution and/or approval is expected to reach CEO-level **within 7 days**. Remediation action will be developed **within 7 days** after the approval by higher management.

The ALP Coordinator should track the remediation with the appropriate parties, as determined by higher management.

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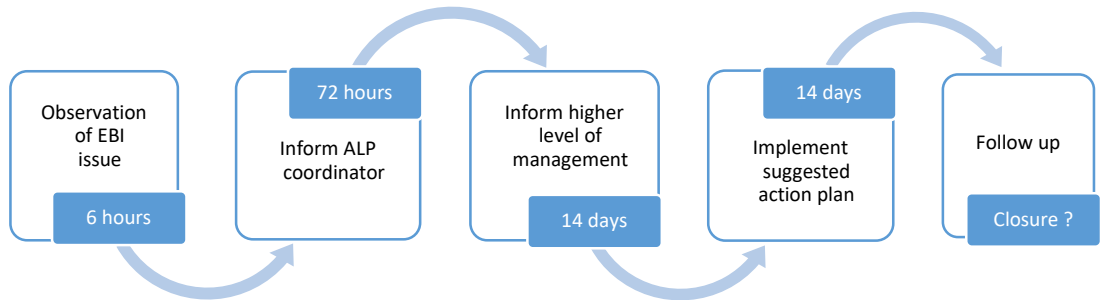
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Follow-up results of the action taken should be reported by the ALP Coordinator to the whole group **within 14 days**, as shown on the above escalation table.

- During the follow-up visit(s), the ALP Coordinator verifies the status of the agreed plan of action and whether the situation has been resolved. After which, and provided the following conditions are met, the EBI can be closed:

- no recurrence was observed during the follow-up visit, the agreed plan of action was implemented, and the ALP Coordinator believes that and documents why such a situation would likely not occur again on the same farm.



7.7 RESOLUTION AND CLOSURE

Following the final decision taken on the EBI, the ALP Coordinator needs to close it by documenting the following information in the **EBI form**: the status of the agreed plan of action, the date of the follow-up visit, the closing date, and the reasons for which the ALP Coordinator believes such a situation would likely not occur again on the same farm.

7.8 REVIEWING THE CONTRACT

Should a farmer's guilt be proven in the case of an EBI, his contract would not be renewed for the following production season.

The non-renewal of a contract due to an EBI will be documented.

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INTERNAL REPORT DOCUMENT

EXTREME BREACH ISSUE

TO:	CEO
COPY TO:	Local Sustainability Team & Group Sustainability Team
FROM:	ALP Coordinator
DATE:	
SUBJECT:	

COUNTRY REVIEW TEAM

ALP Coordinator:
Chief Agronomist:
Leaf / Procurement Manager:

REVIEW DETAILS

Explain the situation by replying to "What? When? Where? Why? Who?"
Who else is informed of the situation?
Is law enforcement aware of the situation?

MANAGEMENT REVIEW – FUTURE OBJECTIVES AND RESPONSIBILITIES

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CEO:

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Signature:

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Final Status