

Responsible Sourcing Policy for Bentax A/S

DD-02a, Version 1.0 August 2025





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Bentax A/S Responsible Sourcing Policy

Commitment by our Management.

Bentax A/S is committed to establishing sustainable supply chains, via the ethical sourcing of agricultural commodities. We are dedicated to implementing comprehensive policies across all business aspects, setting specific, measurable goals to prevent deforestation and ecosystem conversion, and to uphold human rights throughout our purchasing activities.

Our Responsibility to People and Nature

At Bentax, we recognise the critical role that forests play in safeguarding our climate, protecting biodiversity, and supporting the livelihoods of local communities. As a company engaged in the coffee trade, we are fully aware that our sourcing decisions carry both environmental and social consequences. That is why we are committed to responsible sourcing practices that ensure our coffee does not contribute to deforestation, forest degradation, or human rights violations.

Our approach is guided by internationally recognised standards for sustainable business, including the UN Guiding Principles on Business and Human Rights and the EU Regulation on Deforestation-Free Products (EUDR). This means we prioritise transparency in our supply chains, meaningful engagement with suppliers, and strict adherence to legal requirements and ethical practices.

Responsible sourcing is not just a requirement—it is a reflection of Bentax's core values: integrity, professionalism, and excellent service. It is how we do business in a way that we can stand behind—towards our customers, our partners, and future generations.

In alignment with international norms and standards, our Responsible Sourcing Policy seeks to ensure legally compliant and environmentally sound sourcing practices while upholding our commitment to human rights at every supply chain level. The implementation of our policy includes consistent policy reviews and updates, robust supplier engagement and capacity building, transparent reporting, and the implementation of an effective complaints mechanism. All of these measures are aimed at fostering supply chains that reflect our commitment to environmental integrity, ethical practices and social responsibility.

This sourcing policy is developed under the guidance of the [Preferred by Nature Sustainability Framework](#), ensuring alignment with established best practices for responsible business activities, in relation to people's well-being, the environment and the climate.

The policy is endorsed at the executive level of our organisation. Updates and further information in relation to the policy can be found on our website here: www.bentax.dk. For any questions regarding our Responsible Sourcing Policy please contact Direktor Mette Kaarsberg, mk@bentax.dk.

Scope of our Responsible Sourcing Policy

This policy applies to all sourcing activities at Bentax that involve coffee and coffee-related products covered by the EU Deforestation Regulation (EUDR). It includes our direct procurement of green or roasted coffee, as well as private label products and white-label solutions sourced through third parties.

The policy covers the entire supply chain—from origin and production through processing and import to final sale in the EU market. It applies to all suppliers, including farms, cooperatives, exporters, traders, and manufacturers, regardless of geographic location.

All departments involved in purchasing, quality assurance, sustainability, logistics, and product development are responsible for ensuring that sourcing decisions align with the requirements outlined in this policy. The scope also includes any subcontracted sourcing or packaging partners acting on behalf of Bentax.

In addition, the policy serves as the framework for our due diligence system under the EUDR, including information gathering, risk assessment, risk mitigation, and public reporting as required by the regulation.

Alignment with Our Code of Conduct

Our Responsible Sourcing Standard is directly linked to Bentax's Code of Conduct. The Code of Conduct sets the overall ethical principles for how we do business, while the Responsible Sourcing Standard specifies how these principles are applied in our supply chains when sourcing coffee and in meeting EUDR requirements. Together, they ensure consistency, integrity, and responsibility across our operations and partnerships.

1. Responsible Management and Business Practices

As part of our commitment to responsible sourcing, we will uphold the highest standards of environmental stewardship, social responsibility and ethical conduct across all our operations. This is reflected in our comprehensive approach to sourcing products, commodities, and services, ensuring that our practices are not only in full compliance with legal requirements in the country of origin but also contribute positively to the communities and landscapes within which we operate.

The following elements together comprise our standard for responsible management and business practices:

1.1 Land Tenure and Management Rights are Secure.

We seek to ensure that land tenure and management rights of the farms and forests we source from are secure and established for all rights holders involved.

Recognising the importance of respecting the rights and resources of Indigenous Peoples and local communities, we ensure that Free Prior and Informed Consent (FPIC) is obtained from Indigenous Peoples whenever farming or forest operations have the potential to impact their lands or livelihoods. Our commitment extends to ensuring that all land tenure rights are securely registered in compliance with legal requirements, and that land management practices are responsibly implemented and duly recorded.

1.2 Management Planning and Operations are Conducted Responsibly.

The land-use, management planning and operational activities in the forests and farms we source from, adhere to all legal requirements, including the lawful harvesting of forest products or production of agricultural commodities. Furthermore, we are committed to transparency, complying with legal mandates for the disclosure of relevant information to stakeholders.

1.3 Taxes and Fees are Paid.

We ensure the timely and lawful payment of all applicable taxes and fees, including royalties, land/area taxes, value-added taxes, corporate taxes and any relevant trade or export taxes and fees.

1.4 Corruption, Fraud and Conflict of Interest are Avoided.

Our operations are founded on principles of integrity, accountability and long-lasting partnerships, with stringent measures in place to avoid corruption, fraud and conflicts of interest, while business integrity is ensured according to best practices. We seek to ensure compliance with all legal requirements addressing bribery, fraud and conflict of interest. We also take measures to avoid the falsification of data and documents, in order to foster a culture of honesty and transparency.

1.5 Trade and Procurement are Responsible.

Trade and procurement practices must be conducted in accordance with legal requirements, including those relating to trade and transport of products, trade restrictions and sanctions, laws relating to product classification and import/export regulations.

Respecting principles of fairness and transparency in contractual obligations, we also adhere to legal requirements for offshore trading, transfer pricing and due diligence, ensuring that our sourcing practices are not only lawful but also ethically and socially responsible.

2. People's Well-being and Human Rights

We are committed to ensuring that people's welfare and the rights of individuals are respected and avoid engaging in or benefitting from controversial business practices. This commitment encompasses a broad spectrum of subject matters intended to uphold human dignity, promote fair labour practices, and foster positive community relations.

To ensure that our partners genuinely comply with the social and human rights requirements of the EUDR, Bentax seeks to conduct on-site visits with new suppliers and business partners. These visits provide an opportunity to validate that national legislation in the country of production is respected, and that the conditions for workers and local communities are in line with both international standards and national regulations.

The following elements together comprise our standard for social responsibility:

2.1 Human Rights are Respected.

We ensure that human rights are upheld across all operations and activities, adhering to both international and national laws.

Our business practices, including the harvest and trade of products, do not contribute to human rights violations or fuel armed conflicts.

2.2 Child Labour is Absent from Our Forest and Farm Operations. The Employment of Young Workers is Responsibly Managed.

We work to ensure all legal requirements are met, in relation to child labour.

Children under the age of 15 (or underage for the completion of compulsory education, whichever is higher) are not employed, except within the framework of "Family Farm" work or where covered by the national legislation¹.

We ensure the protection of children and where young workers are employed, their engagement is managed in line with best practices and legal requirements.

2.3 Modern Slavery, Forced or Compulsory Labour Do Not Occur.

Our operations are free from forced labour, modern slavery, and human trafficking. We ensure that workers have the freedom to choose their employment, without undue restrictions or dependences.

2.4 Workers' Rights are Respected.

We respect the rights of all workers, in alignment with the International Labour Organisation's (ILO) core conventions, including the legal requirements related to rights to freedom of association, collective bargaining, fair working hours, and rest periods.

Where migrant workers are hired, their employment rights follow legal requirements. Their legal authorisation to enter, stay and engage in a remunerated activity in the area/country is ascertained. They enjoy the freedom to travel to and from the area/country without restrictions, except those defined by law and are afforded equal opportunities and treatment in comparison with all other workers.

2.5 Discrimination Does not Occur.

Discrimination in employment or occupation is not tolerated, in alignment with legal requirements. We also ensure fairness in hiring, remuneration, training, promotion, employment termination and retirement practices.

¹ See [Preferred by Nature Certification - Terms and Definitions](#) (PBN-09) and <http://www.fao.org/3/a-i4306e.pdf>

2.6 Workers are Remunerated in a Responsible Manner.

All workers - whether permanent, contracted, seasonal or migrant workers - are compensated fairly, ensuring compliance with legal wage requirements.

Their remuneration for a standard workweek is sufficient to afford a decent standard of living for the worker and their family and meet or exceed minimum industry standards or other recognised industry wage standards.

2.7 Facilities, Operations and Activities are Safe.

We ensure safe and healthy facilities and operations, providing appropriate personal protective equipment to all workers.

Compliance with workplace health and safety laws is non-negotiable. Workers must be competent in the handling chemicals and machinery and receive appropriate trainings. All necessary equipment and services – such as personal protective equipment, tools and appropriate facilities for cleaning and washing, first-aid equipment and medical services – are available to, and used by, workers.

2.8 Employer-provided Accommodation is Safe and Hygienic.

We ensure employer-provided accommodation is provided in strict adherence to legal requirements.

2.9 Gender Equality is Maintained and Protected.

We uphold gender equality, ensure equal pay and opportunities for equal work, and provide adequate maternity and paternity leave, in accordance with legal requirements.

2.10 The Rights of Indigenous Peoples are Known and Respected.

We recognise and respect the rights of Indigenous Peoples potentially affected by our organisation's activities, engaging with them in a manner that is respectful, culturally appropriate, and based on the principles of Free, Prior, and Informed Consent (FPIC).

2.11 Communities are Supported and Their Rights are Respected.

Our relationship with local communities in the areas where our agricultural commodities are produced is based on respect, collaboration, and mutual benefit. We recognise and respect both legally established community rights and customary rights.

3. Environmental Responsibility

In our pursuit of a responsible approach to our sourcing, we are committed to promoting responsible stewardship toward the environment and the Earth's natural resource capital. We are committed to avoiding negative impacts on the environment caused by our own activities and those activities of our farm suppliers.

The following elements together comprise our standard for environmental responsibility:

3.1 Forests and Other Ecosystems are not Converted.

We recognise that forests and natural ecosystems are vital for maintaining biodiversity, regulating the climate, and supporting the livelihoods of millions of people. Deforestation and ecosystem degradation not only contribute to climate change but also threaten the survival of communities and species worldwide. Moreover, respecting human rights is essential to fostering equitable and fair practices across our supply chains.

Understanding these global challenges, Bentax A/S is deeply committed to responsible sourcing practices that protect the environment and uphold the dignity and rights of all individuals involved. This commitment drives our actions to contribute to a sustainable and just future.

We work to ensure our activities do not contribute to deforestation or the conversion of natural ecosystems. After 31 December 2020, we ensure that none of our supply chains source raw materials from areas that have been converted from forest to agricultural land, degraded or converted primary forests to plantations or other wooded lands, or from degraded naturally regenerating forests.

3.2 Natural Forests and Other Ecosystems are not Degraded.

Our operations are designed to prevent the degradation of natural forests and other ecosystems and maintain their long-term productivity. Compliance with legal requirements governing forest management and harvesting activities is non-negotiable.

4. Climate Responsibility

We are dedicated to addressing climate change through a comprehensive strategy that includes reducing greenhouse gas emissions, implementing proportionate climate change adaptation efforts, and pursuing GHG removal and ecosystem restoration initiatives. Our practices are tailored to the scale and nature of our operations, regularly adjusted to address emerging risks, and aligned with opportunities for sustainable impact.

The following elements together comprise our standard for our climate responsibility:

4.1 Greenhouse Gas Emissions are Reduced.

We commit to reducing greenhouse gas emissions by implementing best business practices tailored to minimise significant emissions. These practices will be regularly adjusted to address risks and align with the scale and nature of our operations.

We are making efforts to reduce the emission of greenhouse gases resulting from our activities and meet, at a minimum, industry best practices and best available technologies. We seek to maintain and improve soil carbon.

Responsible Sourcing Policy Definitions

Definitions of our organisation's policy are align with [Preferred by Nature's Terms and Definitions document](#).

Targets for the Implementation of Our Policy

Specific timebound targets have been set for achieving policy commitments for our organisation. These targets are intended to provide clear and specific goals for our Responsible Sourcing Policy, aligning with other organisational relevant plans and priorities. The targets are measurable, including quantifiable measures of performance or qualitative indicators. This will allow the tracking of progress and determining when targets have been achieved.

Policy element	Commodity	Specific Target(s)	Performance indicator(s) ²	Timeframe
All	Green Coffee	By the end of 2025, 100% of our suppliers will have signed our Responsible Sourcing Agreement.	100%	Q4 2025
EUDR Compliance		By Q2 2026, all direct suppliers of in-scope commodities (as defined under EUDR) will be assessed for deforestation and legality risks.	100%	Q2 2026

Responsible Business Practices We Will Undertake

In order to ensure the success of our Responsible Sourcing Policy, we will carry out the following actions:

Due Diligence Processes

Our organisation has implemented a robust due diligence system, to manage potential risks relating to the criteria described in sections 1 to 4 above. These include ongoing assessments and a strategy for engaging with and monitoring suppliers:

- We will ensure that information about suppliers and sources of material is collected and evaluated to enable traceability and effective risk assessment
- We will conduct risk assessments on all suppliers and the supplies of relevant commodities and products to evaluate whether they meet the requirements of our policy.
- In case risks are identified and cannot be classified as negligible we will carry out appropriate risk mitigating actions to mitigate the potential risks.

Supplier Engagement and Capacity Building

We will engage with suppliers to communicate key aspects of this policy and clarify conditions and expectations. We will support the alignment of our suppliers' operations with our policy by providing resources, training and support, especially to those who need more assistance.

² How achievement of the target will be assessed.

Certification Schemes and Engagement in Other Initiatives

We are committed to procuring products that have been certified against a credible and internationally recognised standard for responsible forest management or agricultural production, where possible, to ensure that the product originates from a well-managed source.

The following schemes are valued by our organisation to meet all core elements of this policy:

Certification or verification scheme	Claim(s)	Comments
EU Organic (EU økologimærke)	Products are produced in accordance with EU Regulation on organic production, covering environmental protection, biodiversity, and natural resource conservation.	While not focused directly on deforestation, the regulation includes provisions on sustainable land use and excludes genetically modified organisms. Supports transparency and traceability.
Rainforest Alliance	Certified farms meet rigorous environmental, social, and economic criteria, including zero deforestation and legality of production.	Used especially for coffee and cocoa supply chains; widely recognised and aligns with EUDR-aligned sustainability principles.
Fairtrade*	Ensures fair prices and working conditions for producers, including democratic cooperative structures and environmental criteria.	Not deforestation-specific, but supports smallholder resilience and responsible practices. Often combined with other certifications.
FSC (Forest Stewardship Council)	Forests managed according to FSC standards are environmentally appropriate, socially beneficial, and economically viable.	Relevant for wood-based packaging and other forestry-related materials; strong legal compliance and traceability system.

*When Bentax will get Fairtrade certification.

Stakeholder Engagement

We strive for open, transparent, and meaningful dialogue with all our stakeholders, including customers, suppliers, community members, and industry partners. This engagement is vital for understanding diverse perspectives, gaining valuable feedback, and building strong, trust-based relationships.

Regular updates, reports, and discussions ensure that our stakeholders are well-informed about our practices, progress, and challenges in our supply chain. We believe that this inclusive approach to communication not only enhances our policy's effectiveness but also contributes to the overall sustainability and integrity of our operations.

Complaints Mechanism

We recognise the importance of an accessible and responsive complaints mechanism as a key aspect of our business practice. This mechanism needs to be user-friendly, confidential and impartial. It should ensure that every complaint is addressed promptly and effectively while upholding the principles of fairness and respect for all parties involved. This approach underscores our dedication to continuous improvement and accountability in our operations.

If you wish to voice your concern about or report a potential or actual violation of our Responsible Sourcing Policy please go to www.bentax.dk and find our whistle blower contact.

Public Reporting

We are dedicated to fostering transparency and open communication across all facets of our operations. This commitment includes regularly disclosing information about our sourcing practices and the level of conformance with our Responsible Sourcing Policy that we have achieved.

By providing clear and accessible reports, we aim to maintain accountability and reinforce trust among our stakeholders. We ensure that our practices not only comply with legal requirements but also align with our core values of integrity and responsibility in all aspects of our business.

This reporting is included in our ESG report, which is published annually and made publicly available. The ESG report documents our progress, challenges, and key performance indicators related to responsible sourcing and sustainability.

Review and Adaptation of This Policy

We will monitor internal systems and procedures which underpin the implementation of this Responsible Sourcing Policy. As necessary and applicable, access will also be made for external evaluations of the performance of the relevant systems are in place, to ensure that they are implemented and functioning as intended.

Adaptions will be made to both the Responsible Sourcing Policy and the systems and procedures which underpin its implementation, in response to new insights, changes in international norms or regulatory requirements, and stakeholder feedback. This dynamic approach allows us to be agile and responsive to emerging challenges and opportunities, ensuring our policies not only meet current sustainability standards but also anticipate future needs and trends. Through this continuous improvement process, we reaffirm our commitment to sustainability, ethical practices, and social responsibility.

Over time, we expect to continuously raise the sustainability standards of our sourcing activities by improving their credibility and robustness of our sourcing activities, certification and verification standards and sourcing requirements.

Version History

Version Reference	Version Date	Description of revisions made
1.0	30 / 07 / 2025	

Signed by:

Mette Kaarsberg, director
Date: 1. August 2025