

# Group Non-GM Policy

Issue number:	02
Owner:	<b>Group Product Development and Quality Management</b>
Approved by:	Sustainability Committee and Executive Chairman
Approval Date:	5 <sup>th</sup> July 2019
Effective Date:	5 <sup>th</sup> July 2019

## 1. Overview

Vitasoy's two-pronged Sustainability Framework – “Making the Right Products” and “Making Products the Right Way” -- summarises our commitment to delivering sustainable products that support a healthy lifestyle and making them in a way that prioritises efficient resource consumption while minimising environmental impact. This Non-GM Policy supports Vitasoy International Holdings Limited's (“the Group”) stance on the use of non-genetically modified raw materials.

## 2. Scope

This Non-GM Policy applies to all edible raw materials being used for products manufactured by the Group which includes all subsidiaries and joint ventures over which the Group has management control in tofu and beverage manufacturing.

## 3. Principles and Requirements

- Only approves the use of soybeans that are certified to be non-GM with a 3<sup>rd</sup> party laboratory test report and a non-GM declaration from suppliers.
- Only approves the use of edible raw materials (non-soybean) that are guaranteed to be non-GM with a non-GM certificate and/or non-GM declaration from the respective supplier except raw materials with no GM risk.
- Does not approve the use of any edible raw material should the two criteria above be not met to prevent them from becoming an approved item for future purchase.
- Develops non-GM specifications for edible raw materials for Purchasing and Group Quality Management to strictly follow and to monitor the GM status of incoming edible raw materials in daily operations.
- Labels products with non-GM/GM status according to local regulatory requirements to help consumers make informed choices.

#### **4. Implementation**

- a. Group Product Development:
  - Oversees the implementation of this Policy through working with local Purchasing departments and Group Quality Management seamlessly on awareness, understanding and alignment.
  - Reviews non-GM certificate and/or GMO declaration and/or 3rd party laboratory test report of sample(s). Performs in- house GMO tests on soybean samples as soybean is the major ingredient used by the Group.
  - Conducts regular in-house GMO tests based on random sampling, rejects such material if test result contradicts supplier's declaration, and upon recurrence of the issue, supplier can be disqualified.
  - Approves/disapproves edible raw materials for use based on certificates obtained or 3<sup>rd</sup> party laboratory/in-house test results.
  - Provides briefing/training on the Policy to employees who require such information in their daily operation to foster their understanding and adherence to the Policy.
- b. Local Purchasing:
  - Sources non-GM raw materials.
  - Obtains samples, non-GM certificates and/or GMO declaration and/or 3<sup>rd</sup> party laboratory test reports from suppliers.
  - Is entitled to terminate the supplier agreement should a supplier fail to meet the Group's non-GM criteria.
- c. Quality Management:
  - Reviews Certificate of Analysis (COA) of every lot of edible raw material received.
  - Performs in-house GMO test on every container of soybean received.
  - Conducts audit on soybean suppliers annually and other edible raw material suppliers as needed.

#### **5. Review of the Policy**

The Sustainability Committee will conduct a periodic review on this Policy if deemed appropriate.

- End -