



Vendor Code of Conduct

The Company's Purpose is to Feed the Human Spirit™. We are guided by our Values of Honesty, Integrity, Respect, Safety, Diversity and Inclusion and care deeply about the rights of those with whom we work and rely on to operate our business every day, including our associates, customers, and the communities in which we operate. This Vendor Code of Conduct (Code) is informed by internationally agreed upon standards, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We expect all Vendors, including direct and indirect suppliers of goods and services, contractors, and service providers, to comply with this Code and the expectations it sets forth and to uphold these Values in their business activities. We also expect all Vendors to escalate expectations consistent with this Code to their business partners.

- a. **LEGAL COMPLIANCE:** We require each Vendor to be in full compliance with applicable local and domestic laws. Where local laws differ from the expectations set out in this Code, we expect Vendors to meet the higher standard. Failure to comply with this Code may result in a termination of the business relationship.
- b. **FORCED LABOR:** Vendor must ensure that no forced labor, including indentured, bonded, involuntary, or prison labor is used or supported. All workers must be employed or engaged on a voluntary basis, as defined in the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105).
- c. **CHILD LABOR:** Vendor must not employ individuals under the age of fourteen (14) or the applicable minimum age for employment, whichever is higher. Employees under the age of eighteen (18) must not perform work that may jeopardize their health, safety or morals as set out in ILO Minimum Age Convention No. 138 and should not be employed in a manner that prevents them from completing compulsory education.
- d. **HEALTH AND SAFETY:** Workers may not be exposed to unreasonably hazardous, unsafe, or unhealthy conditions. Responsible action must be taken to ensure emergency preparedness and equipment, machine, and chemical safety. Vendor must ensure facilities have, including but not limited to, accessible and adequate bathrooms, potable water, sanitary food preparation and eating facilities, ventilation, lighting, and temperature control. If housing is provided, living conditions must be clean, safe, and reasonable.
- e. **NON-DISCRIMINATION:** Workers may not be discriminated against on the basis of race, color, religion, gender, national origin, age, disability, sexual orientation, marital status, or any other protected status. Vendor may not use medical tests unrelated to physical requirements of the job or pregnancy tests to inform hiring or employment decisions.
- f. **HARASSMENT AND ABUSE:** Vendor must ensure the workplace is free from forms of harassment, including sexual and physical, and any behavior that would cause a reasonable person to experience significant emotional or physical duress. This includes, but is not limited to, coercive, threatening, abusive, or exploitive conduct or behavior or harassment because of one's race, color, religion, gender, national origin, age, disability, or sexual orientation. All workers must be protected from retaliation in good faith, including as related to reporting in good faith incidents of perceived harassment and abuse.
- g. **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING:** Workers must be treated fairly,

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with dignity and respect. Workers have the right to form and join organizations of their own choosing. Vendor will not prevent, retaliate, or discriminate against workers choosing to associate (or not) with any group or bargaining collectively (or not).

- h. **WAGES AND BENEFITS:** Wages and benefits paid to workers must meet or exceed legal requirements. Where there is no legal requirement, Vendors must strive to meet industry wage and benefits standards. Workers must be compensated for all work completed and provided any benefits required by law or contract. In addition, workers must be compensated for all overtime hours worked beyond their regular working hours at a premium rate as legally required.
- i. **HOURS OF WORK:** Vendors must not require workers to work more than the lesser of a) 48 regular work hours per week, plus 12 hours of overtime, or b) the limits on regular and overtime hours as allowed by local law, except in extraordinary circumstances and then strictly in compliance with all applicable laws. Vendors shall carry out operations in ways that limit overtime to a level that ensures productive and humane working conditions.
- j. **ENVIRONMENTAL:** Vendors must maintain written environmental policies and standards and must comply with all applicable environmental laws to be responsible stewards of natural resources.
- k. **ANTI-CORRUPTION & FAIR DEALING:** Vendor must comply with the provisions of the U.S. Foreign Corrupt Practices Act of 1977, as amended. Vendor will not accept, offer, or provide money or anything else of value to any agent or representative of any government or government agency to obtain or retain business. Vendor may not engage in any conduct likely, intending, or appearing to improperly influence the Company's representatives in the performance of their job responsibilities. Bribes, cash payments, and business gifts and entertainment of more than token value expressly are prohibited. Vendor must refrain from engaging in any conduct that may appear improper or result in a conflict of interest when viewed from the Company's point of view. All conflicts of interest must be disclosed to the Company as soon as possible.
- l. **MANAGEMENT SYSTEMS:** Vendor must establish and maintain management systems to ensure compliance with all applicable laws and uphold expectations and requirements set forth in this Code. Vendor must ensure that its workers are legally authorized to work according to the national laws and international standards relevant to the country where work is taking place. Prior to each worker's assignment, Vendor must require documentation proving such work authorization and worker age. Every worker must have employment documentation (e.g., a contract, offer letter, etc.) in a language they understand that is freely acknowledged and accurate to their position. A copy of the documentation must be provided to the worker.
- m. **SUBCONTRACTING:** Vendor will act with reasonable diligence to ensure that its contractors, subcontractors, manufacturing facilities, labor providers, agents, agencies, associations, distributors, partner organizations, suppliers, affiliated companies, or subsidiaries who are involved in Company business also comply with the obligations set forth in this Code. Subcontractors must be disclosed to the Company in writing prior to authorizing production.
- n. **ACCESS:** Vendor will allow the Company, or a third-party auditor selected by the Company, to audit Vendor's compliance with this Code. Vendor must maintain documentation needed to demonstrate compliance and will promptly respond and provide this documentation to the Company upon request.
- o. **GRIEVANCE MECHANISM:** Vendor must provide workers access to a grievance mechanism in a language they understand that enables them to raise concerns without fear of intimidation. Retribution or retaliation taken against any individual for reporting in good faith is prohibited.

Violations of this Code may be reported using the Company Help Line – www.Ethicspoint.com or 800-689-4609 - available 24/7 in multiple languages. Users of the Help Line may choose to remain anonymous.