



Griffith Foods' Supplier Code of Conduct

Griffith Foods' purpose is to blend care and creativity to nourish the world. This purpose is built upon our value of caring for our people and we aim to work with suppliers that are committed to values that are compatible with our own.

This document establishes expectations of our suppliers with regard to human rights, environment, ethical practices and compliance with legal requirements as well as the Griffith Foods Code of Ethics and Business Conduct, Human Rights Policy and other relevant policies. Further requirements for suppliers on topics including food safety, quality and transportation are covered in a separate Supplier Requirement Handbook.

As a condition of doing business with Griffith, we require suppliers and partners to acknowledge their commitment to the Supplier Code in writing. We also expect suppliers to hold their own supply chains, including third-party labor agencies, to the same requirements. Suppliers are not permitted to sub-contract the production of goods and services for Griffith Foods unless previously agreed in writing. If Griffith has approved sub-contracting, the sub-contracted workplaces are expected to meet the same requirements.

We conduct due diligence in our supply chain to understand, and take appropriate steps to address, human rights, environmental and ethics issues in our supply chain. We expect suppliers to do the same. We use an internationally recognized third party platform to monitor the sustainability performance of suppliers, and reserve the right to request suppliers to improve their practices and to suspend/terminate supplier relationships where suppliers do not meet our expectations. For further details, see the Compliance section below.

All Griffith Foods suppliers, defined as third parties with whom Griffith Foods has active commercial relationships for the supply of goods or services, are expected to apply this Supplier Code of Conduct as follows:

Human Rights

- Child Labor
 - Suppliers must ensure that child labor is not used in any part of their operations or supply chain. In line with the International Labour Organization (ILO) definition, "child labor" refers to work that is mentally, physically, socially or morally dangerous and harmful to children, or interferes with their schooling. In no case shall any child younger than fifteen (15) years of



- age, or under the legal age of work or compulsory schooling (whichever is higher), be employed by the supplier or work in the supplier's operations, subject to exceptions recognized by the ILO. The supplier will ensure that any work done will not be harmful to their development or health if people under the age of 18 are employed.
- Suppliers must ensure that child protection measures are in place, so no harm, exploitation, or abuse occur as a result of the activities of the supplier's employees or workers.
 - Forced/Involuntary Labor
 - Suppliers must not permit any form of forced labor, including any form of prison, trafficked, indentured or bonded labor, in their operations or supply chain.
 - Suppliers must not use any form of corporal punishment or mental or physical coercion as a form of discipline of their employees or workers, regardless of gender.
 - Employment must not be dependent on payments or deposits charged to employees or workers. Pay is not withheld, and no conditions are present that constrain an employee or worker's ability to freely choose employment.
 - Prior to employment, suppliers will provide accurate and understandable information regarding the nature of work, compensation, work hours, the organization's sexual harassment policy, and benefits in writing in workers' and employees' native languages.
 - Legal Employment
 - Suppliers are required to ensure all their employees and workers have the legal right to work.
 - Suppliers must ensure any migrant workers are in possession of valid work permits issued by the appropriate authority.
 - **Identity documents (such as passports, identity cards, etc.) must not be retained, and freedom of movement must not be restricted.**
 - Discrimination and Harassment
 - Suppliers must not practice discrimination or harassment in hiring, pay, promotion, or in the workplace on the basis of race, color, sex, national or social origin, religion, age, disability, sexual orientation, marital status, pregnancy status, gender identity, union membership, or any other status protected by applicable law.
 - Suppliers must prohibit all forms of violence and harassment in the workplace, including verbal, physical, sexual or psychological abuse. All employees and workers must be protected from retaliation for reporting harassment.
 - Freedom of association and collective bargaining
 - Suppliers' employees and workers, regardless of gender, must have the right to join, not join, or form a labor union in accordance with the law without fear of reprisal, intimidation, or harassment.
 - Suppliers must be committed to establishing a constructive dialogue with a union's freely chosen representatives and bargaining in good faith where employees or workers are represented by a legally recognized union.
 - Wages and Work Hours
 - Suppliers must ensure that their employees and workers, regardless of gender, are fairly compensated, and all legally mandated wages and benefits are provided, payment of wages



are made on time on at least a monthly basis, and itemized records are kept to ensure transparent pay information is available.

- Suppliers must ensure that pregnancy, maternity and lactation benefits, including relevant protections, leave, and accommodations, are provided in accordance with the law.
- Suppliers must ensure regular and overtime working hours are in compliance with applicable laws and overtime working hours are recorded in compliance with applicable laws, and further, that overtime working hours are voluntary and compensated at a premium rate.
- Suppliers must ensure that 24 consecutive hours of rest are provided in every 7-day work period. If allowed by law, 48 consecutive hours of rest in every 14-day work period are permitted.
- Health and Safety
 - Suppliers must ensure a safe and hygienic workplace is provided for all employees and workers, regardless of gender, in compliance with the law, and systems are in place to detect and manage potential risks to employees and workers.
 - Supplier facilities must be constructed and maintained in accordance with applicable laws and regulations and Employer-provided housing, transportation and food must be sanitary and safe and meet the basic needs of employees and workers while respecting their dignity. Suppliers must ensure that there are appropriate exits, procedures and equipment in place to deal with emergency situations.
 - Suppliers must provide training on safe work practices and emergency planning.
 - Suppliers must provide employees and workers, regardless of gender, adequate personal protective equipment to safely carry out their duties.
 - Suppliers must provide adequate access to clean toilet facilities, potable water, and sanitary facilities for food storage.

Environmental

- Griffith Foods expects suppliers to support its sustainability commitments through the adoption of good operating and farming practices. Suppliers are responsible for managing, measuring and minimizing their environmental impact. Specific focus areas include greenhouse gas and other air emissions, waste reduction, recovery and management, water use and disposal, biodiversity, soil conservation and pesticide management.
- Suppliers must ensure compliance with all applicable environmental laws and regulations.
- Suppliers must diligently work to meet Griffith Foods' goals related to sourcing their materials from fully traceable, certified sustainable sources, and reporting compliance based on specific initiatives (Farm Sustainability Assessment, RSPO, RSSO, etc.).
- Suppliers must obtain legal title to or a legal lease for their land, and ensure there are no indications that the suppliers' right to own or lease that land is contested. Suppliers must respect the rights to land tenure of local communities and indigenous peoples impacted by their operations.
- Suppliers must ensure all required environmental permits for use and disposal of water and waste are obtained.



Ethics

- Suppliers must conduct business in an ethical manner in all business dealings.
- Griffith Foods does not tolerate bribery or corruption in any form. We expect our suppliers to uphold the principles defined within our Code of Ethics and Business Conduct.
- Supplier must comply with all applicable laws, including those pertaining to bribery, corruption, or any type of fraudulent business practice
- Suppliers are expected to maintain accurate records of their activities and performance that clearly demonstrate compliance with all applicable standards, regulations and Griffith Foods requirements.
- Suppliers are required to disclose relationships, economic, personal, or otherwise, associated with their business that are held by a Griffith Foods employee or contractor.
- Suppliers shall meet all requirements of supply as set forth in the Griffith Foods Supplier Handbook, including but not limited to the confidentiality of Griffith Foods information.

Compliance

- Suppliers must ensure their operations comply with all applicable laws and regulations at a minimum and meet all of Griffith Foods' requirements defined in this Supplier Code of Conduct. To identify whether a supplier is in compliance with this Supplier Code of Conduct, Griffith Foods reserves the right to request suppliers to complete self-assessments, disclose relevant policies or procedures, or to be subject to on-site direct and/or third-party audits or evaluations of the suppliers' facilities. If Griffith Foods identifies areas of non-compliance, Griffith Foods reserves the right to request suppliers to make the necessary investments in systems and conditions improvements to ensure compliance.
- Upon request, Griffith Foods also expects its suppliers to share with Griffith Foods information regarding their relevant supply chain policies and practices, conditions or risks in their supply chains, and how such conditions or risks are being prevented or addressed. If requested by Griffith Foods, suppliers will disclose to Griffith Foods information related to their supply chain, including countries of origin of materials used in products supplied to Griffith Foods.
- Suppliers must immediately report any concerns about compliance with legal requirements or any aspect of this code to Griffith Foods.
- If a supplier is found to be in violation of this Code of Conduct or any other requirements set forth, Griffith reserves the right to terminate any business agreement or relationship.
- Griffith, in its sole discretion, reserves the right to not initiate, to suspend or to terminate its relationship with a supplier if the supplier refuses to consent to this Supplier Code of Conduct or to take the appropriate steps to come into compliance with this Supplier Code of Conduct.

Whistleblowers

- Suppliers must have the means for the confidential reporting of concerns about workplace grievances, violations of company policies, legal violations, misconduct or unethical behavior by employees, workers and external parties, and an appropriate, unbiased and responsive mechanism for addressing any issues identified.



- Suppliers will not retaliate against employees or workers, regardless of gender, reporting violations or cooperating in investigations. Neither will they tolerate threats, intimidation, physical or legal attacks against whistleblowers, or those exercising their rights to freedom of expression, association, peaceful assembly and protest in the supplier's operations or value chain.

Governance

- This Code of Conduct applies to all suppliers of Griffith Foods Worldwide Inc. and the entities in which we hold a majority interest. It is overseen by our Board of Directors, including our Chair and CEO.
- Our VP Global Purchasing is responsible for ensuring the application and continued oversight of the policy across our business and value chain.
- This Supplier Code of Conduct will be reviewed at least once every three years to ensure that its requirements remain relevant and implementation remains effective. Suppliers will be notified of any changes and required to re-affirm their compliance.

Greg Metschke

A handwritten signature in black ink, appearing to be "GM", written over a horizontal line.

Vice President – Global Purchasing

Griffith Foods Inc.