



Supplier Code of Conduct

1. Purpose of Supplier Code of Conduct

- a. Ventura Foods, LLC (“Ventura Foods”) conducts business ethically and in a manner that respects individuals, their communities and the environment. Ventura Foods insists that everyone we do business with including suppliers, contractors, agents, and consultants (collectively, “Suppliers”), demonstrate the same high standards of ethical business behavior. All suppliers are expected to comply with this Supplier Code of Conduct.
- b. Ventura Foods maintains relationships with Suppliers who share our commitment to:
 - Protecting human rights of workers and treating all workers with dignity
 - Creating safe working conditions and a healthy work environment for all workers
 - Safeguarding the environment and reducing the environmental impact of operations
 - Establishing high standards of ethical conduct and complying with fair business practices and applicable laws

These expectations and commitments are contained in this Supplier Code of Conduct (“Code”). The Code is aligned with Ventura Foods’ core values of integrity, customer focus, teamwork and personal ownership. Additionally, all Suppliers actions are governed by the law. We expect all Supplier actions to follow the laws and regulations where they do business. When our Code is more restrictive than those regulations and laws we expect Suppliers to follow the principles of the Code.

2. Human Rights and Labor

Suppliers must respect the human rights of workers and must treat all workers with dignity and respect. Suppliers must:

- a. ***Prohibit Harassment, Harsh or Inhumane Treatment***
Suppliers must provide a workplace free from unlawful harassment, threats of violence, corporal punishment, coercion, sexual exploitation, sexual abuse, and verbal or psychological harassment or abuse. Slave, child, underage, forced, bonded, or indentured labor will not be tolerated. Workers must be allowed to maintain control over their identity documents.
- b. ***Prohibit Human Trafficking and Slavery*** by not producing goods or services for Ventura Foods using forced, bonded, indentured, involuntary convict or compulsory labor. Suppliers must certify that materials incorporated into Ventura Foods’ products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
- c. ***Forbid Unlawful Child Labor***
Suppliers must comply with all applicable child labor laws, including laws governing minimum age requirements and hazardous work. Supplier shall not employ anyone under the age of 14 regardless of any local laws, rules or regulations.
- d. ***Comply with Discrimination and Harassment Laws***
Suppliers must comply with all applicable discrimination and harassment laws, treating their

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workers with dignity and respect. Unlawful discrimination against or harassment of any group or individual may, for instance, be prohibited on the basis of race, color, national origin, gender, sexual orientation, gender identity or expression, marital status, citizenship status, religion, age, physical or mental disability, ancestry or veteran status, or any other protected category.

e. ***Comply with Wage and Hour Laws***

Suppliers must comply with all applicable wage and hour laws, including laws governing minimum wages, maximum hours, days of service, rest periods and overtime pay and restrictions. Suppliers must pay their workers in a timely manner and convey the basis on which workers are being paid.

f. ***Comply with Benefits and Leave Laws***

Suppliers must fully comply with all laws governing worker benefits and leaves.

g. ***Comply with Laws Protecting the Rights of Workers to Freely Associate*** by respecting the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed without fear of retaliation, harassment, intimidation, penalty or interference.

3. **Health and Safety**

Suppliers must maintain safe working conditions and a healthy work environment for all of their workers. Suppliers must:

a. ***Establish Regulatory Requirement Processes and Programs*** that will drive safety, health and environmental compliance with applicable regulatory requirements.

b. ***Communicate Hazards***

Suppliers must ensure that workers receive appropriate workplace health and safety information, training and warnings in their primary language. Suppliers must post Safety Data Sheets for any hazardous or toxic substances used in the workplace.

c. ***Prevent Occupational Injury***

Suppliers must eliminate physical hazards where possible, establish safe work procedures and provide appropriate personal protective equipment. Physical guards, interlocks and barriers should be provided and properly maintained for equipment used by workers.

d. ***Prevent Chemical Exposure*** by identifying, evaluating, mitigating and where possible, eliminating worker exposure to harmful chemical, biological and physical agents. Where hazards cannot be eliminated, Suppliers must provide appropriate controls such as closed systems and ventilation. In all cases, Suppliers must provide safe work procedures, appropriate personal protective equipment and worker training and drills.

e. ***Prepare for Emergencies and Their Response*** by implementing emergency plans and response procedures, including worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities (including ensuring that aisles, exits and stairwells be kept clear and unblocked at all times) and first-aid

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supplies.

- f. **Establish Occupational Safety Procedures** to manage, track, investigate, and report occupational injury and illness.
- g. **Mitigate Ergonomics Risk** by identifying, evaluating and mitigating worker exposure to physically demanding tasks, highly repetitive or forced assembly tasks.
- h. **Food Safety**
Ventura Foods expects Suppliers to provide Ventura Foods with high-quality products, ingredients and services that meet all applicable quality and food safety standards, safe for human consumption, unadulterated and in compliance with all applicable laws and regulations (and/or the laws of the country of final importation and marketing). Suppliers must demonstrate that they have strong food-safety and quality-management practices. Suppliers must immediately report to Ventura Foods any concerns about product safety.

4. **Protection of the Environment**

Suppliers must demonstrate stewardship of the environment and work to reduce the environmental impacts of their operations. Suppliers must:

- a. **Prevent Banned or Restricted Product Content** to ensure products do not contain restricted, banned or unlawfully taken or traded materials, including protected wildlife, protected plants or illegal wood products.
- b. **Manage Hazardous Materials Appropriately** to ensure safe handling, movement, storage, recycling or reuse, and disposal of such materials.
- c. **Monitor and Treat Wastewater and Solid Waste** generated from operations, processes and sanitation facilities, and control and treat such substances as required by applicable laws prior to discharge or disposal.
- d. **Control and Treat Air Emissions** generated from operations prior to discharge as required by applicable laws.
- e. **Conserve Natural Resources and Prevent Pollution and Waste through the use of commercially reasonable efforts** to reduce or eliminate waste of all types, including source reduction, recycling, composting, reusing materials and conserving water and energy.

5. **Business Conduct and Ethics**

Suppliers must commit to the highest standards of ethical conduct and fair business practices. Suppliers must:

- a. **Not Give or Accept Illegal Payments or Engage in Corruption:**
Suppliers must not pay or offer to pay anything of value to any person, including any government official, officer, employee or consultant of a government or governmental department or agency officer or employee of a state-owned enterprise or partially state-owned enterprise, political party or official, candidate for political office, officer or employee of a public international

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organization, for the purpose of improperly influencing such person or obtaining or retaining business. Suppliers must fully comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other applicable corruption laws.

b. ***Comply with Antitrust and Competition Laws:***

Suppliers must prohibit agreements and actions that unreasonably restrain trade, are deceptive or misleading, or that unreasonably reduce competition. Suppliers must comply with all applicable antitrust and competition laws.

c. ***Behave Ethically in General Contracting:***

Suppliers must compete fairly and ethically for all business opportunities. Suppliers must ensure that all statements, communications and representations to Ventura Foods are accurate and truthful.

d. ***Protect Intellectual Property and Confidentiality:***

Suppliers must respect and protect Ventura Foods' intellectual property rights and maintain the confidentiality of Ventura Foods trade secrets and other Ventura Foods proprietary or confidential information. Confidential and proprietary information includes any information that is non-public or not easily determined or obtained by others. Suppliers must also respect the intellectual property rights, trade secrets and confidential or proprietary information of third parties and are prohibited from compromising these rights in the course of working with Ventura Foods. Suppliers may not use Ventura Foods' name or trademarks in any advertising or marketing materials without prior written authorization from Ventura Foods.

e. ***Comply with Securities and Insider Trading Laws:***

Suppliers that possess non-public information relating to Ventura Foods may not use or share that information to trade or enable others to trade in Ventura Foods securities or the securities of another company to which such information pertains. Suppliers must comply with all applicable securities and insider trading laws.

f. ***Operate with High Financial Integrity:***

Suppliers must not make false, inaccurate or intentionally misleading entries in accounting books, records or communication with external or internal auditors related to Ventura Foods, and must maintain accurate books and records in compliance with generally accepted accounting principles.

g. ***Avoid Conflicts of Interest:***

Suppliers must disclose to Ventura Foods any actual or potential conflict of interest. For that reason, Suppliers must inform Ventura Foods if a Supplier's worker, investor or other affiliated person, or his or her family member, has a relationship with a Ventura Foods employee who can make decisions which may affect Supplier's business, or if an employee of Ventura Foods has any interest of any kind in Supplier's business. Ownership of less than 1% of a public company's outstanding shares need not be disclosed unless it might influence judgment or decisions.

h. ***Minimize Gifts and Avoid Offers of Hospitality:***

Suppliers must ensure that the acceptance or giving of any gift or offer of hospitality when



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performing Ventura Foods’ business cannot be construed as an attempt to secure favorable treatment from or to Suppliers. Suppliers or any member of their family must not accept or give any type of gift or any offer of hospitality beyond that of normal value when conducting Ventura Foods business. We expect our employees to follow similar guidelines.

i. ***Comply with All Applicable Laws:***

Suppliers must ensure that they, their affiliates and their workers comply with all applicable laws and regulations when conducting business for Ventura Foods.

6. **Asking Questions/Reporting Concerns**

Ventura Foods expects Suppliers who believe that an employee of Ventura Foods, or anyone acting on behalf of Ventura Foods, has engaged in illegal or otherwise improper conduct, to immediately report the matter to Ventura Foods. The Supplier should contact Ventura Foods’ Hotline at <https://www.reportlineweb.com/venturafoods> or ethicshotline@venturafoods.com or 1-(800) 620-7407.

7. **Monitoring, Certifications and Auditing**

Suppliers should designate one or more of its management staff to be responsible for assessing and monitoring its compliance with this Code. Ventura Foods may ask Suppliers to execute certifications of their compliance with the principles in the Code. Ventura may assess compliance with the Code through visits to Suppliers’ facilities. Suppliers are responsible for keeping all information and documentation necessary to demonstrate compliance with the principles of the Code. Compliance with the principles of the Code is a material condition of continued business with Ventura Foods. Nothing in the Code is intended to create any employment relationship with a supplier’s workers or any new or additional third party rights for a Supplier or its workers.

Vendor: _____

Signature: _____

Name: _____

Title: _____

Date: _____

The individual signing above represents and warrants that he/she is authorized to bind Supplier to the terms and conditions set forth above.