



## AMALGAMATED SUGAR COMPANY SUPPLIER CODE OF CONDUCT

- 1. Introduction.** Corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across the global supply chain are of paramount importance to Amalgamated Sugar Company, an Oregon cooperative corporation (“**Amalgamated Sugar**”). These principles apply to all aspects of Amalgamated Sugar’s business and encompass all suppliers, vendors and contractors (each a “**Supplier**” and collectively “**Suppliers**”) that supply products to or perform work for, or otherwise does business with Amalgamated Sugar. These principles are reflected in this Code of Conduct (“**Code of Conduct**”), which establishes the minimum standards that must be met by a Supplier. Supplier is responsible for compliance with the standards set out in this Code of Conduct throughout its operations and throughout its entire supply chain.
- 2. Compliance and Integrity.** Supplier shall know and comply with the laws and regulations that apply to it and its business. Suppliers shall treat legal requirements as a minimum standard. Supplier shall conduct its business with integrity, honoring its business obligations and conducting business fairly and ethically.
- 3. Accurate Documentation.** Supplier shall implement and maintain a reliable system for accurate recordkeeping and maintain books and records that reflect transactions in an accurate and timely way. Supplier shall have appropriate audit and compliance processes in place for matters such as food and feed safety, worker health and safety and labor and employment.
- 4. Treat People with Dignity and Respect.** Supplier shall prioritize the safety, well-being, human rights and dignity of all individuals involved in its business. Supplier shall not support or engage in slavery or human trafficking in any part of its supply chain and shall ensure all labor is voluntary. Supplier must compensate all workers with wages, including overtime, and benefits that, at a minimum, meet the minimum wage and benefits established by applicable law. Supplier shall develop work-hour policies for all workers to ensure compliance with applicable law. Supplier shall not discriminate in hiring, compensation, training, promotion, termination, retirement, or any other employment practices based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker’s ability to perform the job. Supplier shall treat workers with respect and dignity. Supplier shall not subject workers to corporate punishment, or physical, verbal, sexual, or psychological abuse or harassment.
- 5. Health and Safety.** Supplier shall provide a safe, healthy, and sanitary working environment. Supplier shall implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards that are not specifically addressed in this Code of Conduct. Suppliers shall routinely assess work environments for health and safety hazards and eliminate, control, or mitigate these identified risks. Supplier shall not support or engage in, or require any hazardous labor be performed by any person under the age of eighteen (18). Hazardous labor involves any work, that by its nature or the circumstances in which the work is undertaken, involves the substantial risk of harm to the safety or health of the worker or coworkers if adequate protections are not taken. Suppliers shall provide employees with appropriate workplace health and safety training. Suppliers shall issue employees

with the necessary personal protective equipment, at no cost, to protect their health, safety, and welfare.

**6. Product Quality.** Supplier shall provide products that are not defective or unsafe for consumer use. Supplier shall utilize a comprehensive quality assurance process and quality controls based on industry standards and market best practices. Supplier understands that the products or services it provides will be used in a food manufacturing facility and, as applicable, Supplier will comply with all food safety and quality standards required by applicable law and Amalgamated Sugar. Amalgamated Sugar may from time to time request written copies of quality assurance processes and controls from its Supplier. Supplier must report any concerns about product safety or quality issues to Amalgamated Sugar.

**7. Environmental Protection.** Supplier shall make every effort to reduce the environmental impact of its business through efforts such as efficient use of resources and reduction of greenhouse gas emissions and waste. Supplier shall operate facilities in compliance with all environmental laws, including laws relating to waste disposal, emissions, discharges, and hazardous and toxic material handling. Supplier must ensure that the products it manufactures (including the inputs and components that it incorporates into its goods) comply with all environmental laws.

**8. Conflicts of Interest.** All conflicts of interest between Supplier and Amalgamated Sugar must be avoided by Supplier and reported to Amalgamated Sugar prior to entering a business relationship with Amalgamated Sugar. Conflicts of interest that must be reported include, but are not limited to, any close personal relationship, financial interest, or other arrangements that may be considered inappropriate with an Amalgamated Sugar employee.

**9. Anti-Retaliation.** Supplier shall comply with all applicable laws relating to unlawful retaliation, threats, intimidation, and attacks, against individuals who report a compliance or ethical issue learned during the course of work performed for Amalgamated Sugar, who cooperate in good faith with the investigation of a complaint, or who defend environmental or human rights.