



CANADA PACKERS SUPPLIER CODE OF CONDUCT

OVERVIEW AND EXPECTATIONS

The Code of Conduct for Canada Packers and its affiliates establishes standards to ensure that its supply chain is safe, that workers are treated with respect and dignity, that business operations are environmentally responsible, business activities are conducted ethically, and that animals are under good care.

Canada Packers' expectation is that this Code will be adopted by any business providing goods or services to Canada Packers, and in turn applied by that business to its own supply chain and subcontractors, including providers of contract labour and services.

Canada Packers expects its suppliers, as a prerequisite to doing business with Canada Packers, at minimum, to comply with this Code and its standards and to acknowledge such compliance by certifying as outlined in this Code.

LEGAL COMPLIANCE

Fundamental to adopting the Code is the understanding that a business, in all its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. However, Canada Packers encourages Suppliers to go beyond mere legal compliance, drawing upon internationally recognized standards if more demanding, in order to advance social and environmental responsibility and business ethics. In no case can complying with the Code violate local laws. If, however, there are differing standards between the Canada Packers Code and local law, Canada Packers defines conformance to this Code as meeting the more demanding of the two requirements. Should the Canada Packers requirement contradict national laws or regulations, the law shall always be complied with and prevail. In such cases, the Supplier shall immediately inform Canada Packers in writing.

LABOUR AND HUMAN RIGHTS

Suppliers are obligated to uphold the human rights of workers, and to treat them with dignity and respect in accordance with recognized international labour standards. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. We expect our suppliers to make the following same commitments in their labour practices by having controls in place that:

- Ensure that employment is freely chosen and forced, bonded, indenture or trafficking employment shall not be used;
- Prohibit child labor in any circumstance;
- Working hours comply with local laws;
- Compensation paid to workers complies with all applicable wage laws;
- Commit to a workplace free of harassment, violence and discrimination; and
- Allow for the freedom of association.

FOOD SAFETY AND QUALITY

Our goal is to always provide consumers safe, great tasting food, produced in a safe work environment. We expect our suppliers to also value food safety and to comply with all laws and regulations along with Canada Packers' quality standards. We require all our raw material, packaging and ingredient suppliers to have their facilities certified to a Global Food Safety Initiative (GFSI) benchmarked standard.



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HEALTH AND SAFETY

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. We expect our suppliers to make the following same commitments in their labour practices by having controls in place that include:

- Compliance with all labour laws and regulations, along with International labor standards;
- Emergency plans that ensure response procedures are adequate and documented; and
- On-going and stringent efforts to achieve a workplace that is free from work-related injuries & illnesses.

ENVIRONMENTAL

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing and storage operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Suppliers' environmental stewardship responsibilities should include the following:

- Suppliers must operate in compliance with environmental laws, rules and regulations including required permits, monitoring protocols and reporting requirements;
- Energy consumption and all relevant Scope 1 and 2 greenhouse gas (GHG) emissions¹ should be monitored and reduction programs must be in place. Canada Packers will work collaboratively with suppliers on monitoring programs. Suppliers may be asked to provide GHG performance associated with their products or services; and
- Deforestation / Biodiversity – Suppliers shall minimize the clearance, clearcutting, or the removal of a forest or stand of trees from land that is then converted to non-forest use in accordance with environmental laws, rules and regulations including required permits & monitoring protocols and reporting requirements. Canada Packers will not procure fiber-based packaging, soy, beef and palm oil from suppliers sourcing these commodities from areas of high risk for deforestation and biodiversity loss.

ANIMAL CARE

Canada Packers is committed to the humane treatment of animals in a manner that meets or exceeds the [Five Freedoms and Five Domains](#) of animal welfare. Read more about our [Commitment to Animal Care](#). Our suppliers of animals, animal protein or other animal products must operate in alignment with our animal care commitment with the following:

- 1) Comply with all applicable animal welfare laws, regulations and Codes of Practice and/or certification to species-specific on-farm programs, with verification through animal welfare audits;
- 2) Make continuous efforts to improve the animal welfare practices within its production system; and
- 3) Continuously train and educate employees about practices critical to promoting a culture of animal care.

¹ The World Resources Institute's GHG Protocol Corporate Standard classifies a company's Green House Gas emissions into three 'scopes'. Scope 1 emissions are direct emissions from owned or controlled sources. Scope 2 emissions are indirect emissions from the generation of purchased energy.



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ANTIMICROBIAL USE

Suppliers are expected to use antimicrobials in food animals in a responsible manner that seeks to prevent or reduce the development of antimicrobial resistance, while ensuring sick animals receive timely and appropriate treatment to protect animal welfare. Antimicrobials must never be used for growth promotion in food animals. Any use requires veterinary oversight and must comply with applicable laws. Use must be limited to class(es) of least importance to human medicine likely to result in efficacious treatment of animals.

BUSINESS ETHICS

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

- The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement;
- Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted;
- All business dealings should be transparently performed and accurately reflected on our suppliers' business books and records. Information regarding our suppliers' labour, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices;
- Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded;
- Standards of fair business, advertising and competition are to be upheld;
- Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers² are to be maintained, unless prohibited by law;
- Suppliers shall have a policy to reasonably assure that the materials in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses in the Democratic Republic of the Congo or an adjoining country, or other locations; and
Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees.

GIFTS AND ENTERTAINMENT

Receiving gifts or entertainment from suppliers or potential suppliers is against Canada Packers policy. We believe that a "we pay our own way" philosophy with our suppliers which enhances our ethical standards and our business reputation. If there is a good business case for entertaining or socializing with business contacts, Canada Packers employees must pay for all costs of such entertainment and apply for reimbursement through the established Canada Packers expense claim policy. Suppliers acting as an extension of Canada Packers will not offer, give, solicit or receive any form of bribe, kickback or

² Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.



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improper inducement in order to secure business or regulatory approval. This principle applies to Canada Packers transactions everywhere in the world.

MANAGEMENT SYSTEMS

Suppliers shall adopt or establish a management system whose scope encompasses requirements imposed by this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. Canada Packers' expectation is that Suppliers will engage in a meaningful and sincere review on a periodic basis, not to be less frequently than annually of: (a) self-assessment; (b) self-reporting; and (c) self-improvement as pertains to the subject matter of the Code and accordingly management systems should facilitate such objectives.

COMPLIANCE AND MONITORING

Suppliers can have a powerful influence in protecting Canada Packers' integrity and high ethical standards by reporting issues that run counter to these standards. Please report any potential violations to this Code to the following third-party agent and all information will be collected anonymously if desired and passed to the appropriate authority in Canada Packers for investigation. Please call 1-866-831-0620 (North America), 400-820-6853 (China), 0800-500-9694 (Japan), 02-5323-5635 (Philippines), 007-44-935 (South Korea) or <https://canadapackers.ethicspoint.com>