

Monogram Foods

Supplier Code of Business Conduct

Growing with Integrity



A United Commitment to Ethical Behavior

This Supplier Code of Business Conduct from Monogram Food Solutions, LLC, its subsidiaries and affiliates (collectively, "Monogram") establishes the ethical standards we strive to achieve and to which we expect our suppliers to adhere. We are committed to operating our business with integrity, respect, and accountability every day. We choose to do business with suppliers who demonstrate the same commitment to ethical behaviors.



WHAT WE EXPECT OF OUR SUPPLIERS

We expect our suppliers to operate with integrity. Our suppliers play a critical role in helping us to ensure the satisfaction of our customers. This Code supplements any rights or obligations established in any agreement we may have with our suppliers. While not all expectations in this Code apply to each supplier, each supplier is expected to fully comply with this Code and to ensure the same of their suppliers and subcontractors. Monogram reserves the right to decline future business opportunities, or to end existing business relationships with suppliers who do not comply with this Code. Monogram may request and review all relevant records of suppliers to ensure compliance with the terms of this Code.



SCOPE

This Code applies to Monogram's suppliers, independent contractors, consultants, agents, and subcontractors.

COMPLIANCE WITH THE LAW

We are committed to complying with the law. We expect our suppliers to conduct their businesses in full compliance with applicable laws, rules, and regulations.



BUSINESS INTEGRITY

We expect each supplier to conduct its business in accordance with the highest ethical standards and in accordance with standard accounting practices. In addition, we expect suppliers to have controls in place to prevent and detect misconduct, such as the misuse of company assets, conflicts of interest, fraud, embezzlement, corruption, bribery, and extortion. All supplier business dealings should be fair, legal, and honest. Monogram understands the value of small and diverse-owned businesses and their role in a healthy economy. We encourage our suppliers to maintain existing or implement plans utilizing small and diverse-owned businesses.



SUSTAINABILITY

We are committed to operating our business in a sustainable manner by focusing on our employees and the environment and by giving back to the communities where we live and work. We expect our suppliers to share our commitment to sustainable business practices by minimizing the impact of their materials, products, and operations on the environment through continuous efforts to implement best practices.



OCCUPATIONAL HEALTH AND SAFETY

Suppliers must comply with all applicable federal, state, and local laws and regulations regarding worker health and safety. Monogram requires suppliers to maintain the following minimum health and safety standards:

- Provide training on health and safety on a regular basis
- Make available personal protective equipment that complies with federal, state, and local laws and standard
- Provide a workplace that is free from recognized hazards



FOOD SAFETY AND QUALITY

At Monogram, we are committed to providing our customers with the highest quality food products and we expect our suppliers to also follow this commitment to food safety. Suppliers must comply with all laws and regulations governing food safety and quality as well as Monogram's food safety requirements and specifications



ENVIRONMENTAL COMPLIANCE

We are committed to conducting business in a safe, environmentally responsible manner. We expect our suppliers to comply with all applicable federal, state, and local environmental laws, regulations, and standards.



HUMAN RIGHTS AND LABOR PRACTICES

We are committed to observing fair labor practices and treating our team members with dignity and respect. Our policies support the principles contained within the U.N. Declaration of Human Rights and all related guidelines aimed at promoting and protecting human rights. We expect our suppliers to make the same commitments in the treatment of their employees, and in their practices by having controls in place that:

- Verify the age, identity, and eligibility for employment for each employee
- Ensure no one under the age of 18 comes onsite to any Monogram facility to perform services
- Ensure no use of forced labor, including involuntary, indentured, bonded, slave or human-trafficked labor
- Employees shall not be coerced to work through the use of violence intimidation or threats. All employees must be allowed to terminate employment at any time upon reasonable notice
- Respect the right of employees to freely associate, organize, and bargain collectively
- Ensure compliance with applicable wage and hour laws
- Prohibit inappropriate recruiting practices and fees or costs
- Prohibit discrimination, harassment, and workplace violence
- Provide safe and healthy working conditions
- Provide options for employees to report concerns without fear of retaliation



ANIMAL WELFARE

We are committed to the welfare, proper handling, and humane treatment and care for animals in our supply chain. We expect our suppliers to use humane procedures and sound animal husbandry practices designed to prevent the mistreatment of animals. We expect our suppliers who provide meat, eggs, dairy, oil or other animal products to operate in a manner that:

- Complies with all applicable federal, state and local animal welfare laws, regulations, and standards
- Trains and communicates regularly with their employees about animal welfare
- Makes continuous efforts to improve animal welfare compliance
- Maintains a production system that complies with an industry standard welfare program that includes third-party welfare audits



REPORTING ETHICAL CONCERNS

Suppliers should promptly report violations of this Supplier Code of Business Conduct or any alleged misconduct or unethical behavior by a Monogram team member without fear of retaliation. Suppliers may report such violations or concerns to their Monogram business partner or through our third-party compliance website, EthicsPoint, by visiting monogramfoods.ethicspoint.com, or by calling 844-951-5274. EthicsPoint is available 24 hours a day, seven days a week, in multiple languages, and reporters may choose to remain anonymous. When honoring a request for anonymity or a request to keep certain information confidential would, in Monogram's judgment, put the health or safety of others at risk, jeopardize product quality, or compromise protection of the environment, Monogram will disclose all information it feels is necessary to mitigate or eliminate imminent harm. Employees of suppliers are encouraged to work directly with their employers to resolve internal ethical concerns.



CONFIDENTIALITY

Suppliers may not publicize the existence of a business relationship with Monogram or use Monogram's name, trademark, logo, or other marks in any sales, marketing, or publicity activities or material. Suppliers with access to Monogram's confidential information may not disclose the existence of such information without our advance written consent.



DATA PRIVACY AND INFORMATION PROTECTION

Suppliers must comply with all applicable laws and regulations related to the protection, privacy, and processing of data and information. This includes any data or information that relates to an identifiable person that is personal information. Any supplier processing personal information on behalf of Monogram agrees to do so pursuant to Monogram's data processing requirements provided to supplier. Suppliers must promptly notify Monogram upon becoming aware of any unauthorized access, theft, loss, misuse or damage, or any other breach of security, in relation to any Monogram information in the possession of supplier, its agents, or subcontractors.



ANTI-CORRUPTION

Suppliers must not, directly or through others, offer, promise, give, or accept any form of payment or incentive to gain an improper business advantage. Suppliers must not engage in fraud, bribery (including the facilitation of payments), kickbacks, money laundering, embezzlement, extortion, or any other form of corruption. Suppliers must comply with the U.S. Foreign Corrupt Practices Act, and all other applicable anti-corruption laws and regulations and must not take any actions to violate or cause business partners to violate, any applicable anti-bribery or anti-corruption laws. Suppliers are expected to have policies in place that prohibit bribes and other unlawful payments to third parties and government officials. Suppliers are also expected to have controls in place to prevent corruption and to train their employees accordingly.



GIFTS AND HOSPITALITY

Monogram's team members are prohibited from accepting gifts from suppliers, except items that are insignificant, incidental or of nominal value. Any gift or business entertainment provided by a supplier must be for a legitimate business purpose, and must not be, or appear to be, intended to secure an improper advantage or otherwise influence a business decision.