

SUPPLIER CODE OF CONDUCT

ABITEC Corporation's approach to corporate social responsibility is based on our core values and those of our ultimate parent, Associated British Foods. ABITEC Corporation complies with applicable laws, manages its environmental impacts, strives to be a good neighbor and fosters ethical business relationships.

As an international business with suppliers and representatives the world over, ABITEC has a responsibility to trade ethically and with integrity. The people with whom we deal and, in particular, our suppliers and their representatives are expected to share our core values and adopt practices that are consistent with this Code of Conduct.

ABITEC's suppliers and their representatives must comply with all applicable laws and regulations in the country where operations are undertaken. Suppliers and their representatives should also seek to develop relationships with their own supply chains consistent with the values and principles set out in this Code of Conduct.

- **Voluntary Employment**

There can be no forced, bonded or involuntary prison labor and no human trafficking. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer.

- **Freedom of Association and the Right to Collective Bargaining**

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer must adopt an open attitude towards the activities of trade unions and their organizational activities. Workers' representatives must not be discriminated against and must have access to carry out their representative functions in the workplace.

Where the rights to freedom of association and collective bargaining are restricted under law, the employer must not hinder the development of parallel means for independent and free association and bargaining.

- **Working Conditions**

Suppliers and their representatives must provide a safe and healthy workplace for their workers and maintain a productive workplace by minimizing the risk of accidents, injury and exposure to health risks and providing legally compliant safety and health training to their workers.

Compliance with these health and safety requirements should be overseen by suppliers' senior management.

Physical or mental abuse, or the threat of such, is prohibited. Sexual or verbal harassment, as well as other forms of intimidation, are also prohibited.

- **Child Labor**

The use of Child (defined below) labor is prohibited. Suppliers shall adhere to minimum age provisions of applicable law and regulations.



Suppliers currently using Child labor shall immediately stop. Suppliers should develop policies and programs which will provide a transition of any such Child to enable him/her to attend and remain in quality education until no longer a Child. There shall be no further recruitment of Child labor.

Children and Young Persons (defined below) under 18 shall not be employed at night or in hazardous conditions.

Policies and procedures shall conform to the provisions of the relevant International Labour Organization (ILO) standards.

A *Child* is defined as any person less than 15 years of age, unless local minimum age law stipulates a higher age for work or mandatory education, in which case the higher age would apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, the lower age will apply.

A *Young Person* or *Young Worker* is defined as any work over the age of a Child as defined above and under the age of 18.

- **Wages and Working Hours**

Wages and working hours will, at a minimum, comply with all applicable wage and hour laws, rules and regulations, including, but not limited to, minimum wage, overtime, and maximum hours in the country concerned.

All workers should be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure are not permitted

- **No Discrimination**

There must be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, color, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other legally protected class.

- **Confidentiality**

The confidentiality of information exchanged in the course of business must be respected and must not be used for illegal purposes or for individual or entity gain.

- **Ethical Requirements**

Business must be conducted with integrity. The offering, paying, soliciting or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited.

A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

Some examples of bribes are as follows. This is not an exhaustive list:

- lavish gifts, meals, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of on-going business negotiations;
- the uncompensated use of company services, facilities or property;
- cash payments;
- loans, loan guarantees or other credit;
- the provision of a benefit, such as an educational scholarship or healthcare, to a member of the family of a potential customer/public or government official;
- providing a sub-contract to a person connected to someone involved in awarding the main contract; and
- engaging a local company owned by a member of the family of a potential customer/public or government official.

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.

Suppliers, their representatives and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, their representatives and their employees must adhere to the UK Bribery Act 2010.

Suppliers and their representatives should have in place anti-corruption and bribery procedures designed to prevent employees or persons associated with their business from committing offenses of bribery or corruption.

• **Environmental Management**

ABITEC supports and encourages operating practices, farming practices and agricultural production systems that are sustainable. Suppliers and their representatives should continually strive towards improving the efficiency and sustainability of their operations. These efforts should include:

- Conducting regular environmental reviews as applicable to their products and services;
- Appointment of a company environmental representative;
- Demonstration of compliance with all current legislation that may affect their activities;
- Documented water conservation programs; and
- Disclosure of any enforcement, improvement or prohibition notices served on the site within the last 24 months.

• **Quality**

Any goods supplied by suppliers shall be without fault and of the best available design, quality, material and workmanship, be fit for its ordinary and ABITEC's particular purposes and shall



conform in all respects with any order and specification and/or patterns or samples supplied or advised to or by the supplier and/or its representatives.

Any services shall be provided by appropriately qualified and trained personnel, exercising due care and diligence, to such high standard of quality as is reasonable for ABITEC to expect in all the circumstances and shall conform in all respects with any order.

- **Audit and Termination of Agreements**

ABITEC reserves the right to verify its suppliers' and their representatives' compliance with this Code of Conduct.

Where an audit of a supplier and/or its representatives demonstrates deficiencies in complying with this Code of Conduct, the supplier and its representatives will work with ABITEC to implement a program of improvement (remediation) leading to conformance within a mutually agreed upon timeline.

In the event that ABITEC becomes aware of any actions or conditions not in compliance with this Code of Conduct, it reserves the right to request corrective actions. Additionally, ABITEC reserves the right to terminate an agreement for cause with any supplier and/or its representatives for failure to comply with this Code of Conduct.