



P & H Milling Group  
A division of Parrish & Heimbecker, Limited

## SUPPLIER CODE OF CONDUCT POLICY

### Purpose

P&H Milling Group's (PHMG) mission is to mill high quality products for our communities by embracing creativity, technology and our inner strengths while staying true to our core values. The core values of PHMG are Growth-Oriented, Relationship-Focused, Integrity & Trust, Sustainability, and Teamwork & Collaboration. We strive to work with suppliers that uphold these same values.

### Scope

This code of conduct applies to all suppliers of raw ingredients, product additives and packaging.

### Responsibility

We expect our suppliers to fully comply with this Code of Conduct, all applicable laws, legal requirements, best practices, and international standards where they operate, and to improve sustainable practices.

### Definitions

A **Supplier** is defined as a third party with whom we have an active commercial relationship for the supply of goods or services.

### Policy Guidelines

#### ETHICAL BEHAVIOUR

We expect our suppliers to conduct business with high ethical standards including:

**Business Integrity** - Suppliers shall not tolerate bribery or corruption in any form and all accounting transactions must be properly recorded.

**Confidentiality** – Suppliers shall not share any confidential information provided by PHMG relating to their business relationship to: (a) their representatives, except when it relates specifically to providing goods and services to PHMG or on its behalf; or (b) to persons outside the suppliers organization. Suppliers should never use PHMG confidential information for their own benefit or that of other persons. Similarly, PHMG shall not request confidential information about its competitors from suppliers.

**Bribery and Corruption** – Suppliers shall operate legally and in compliance with all applicable laws and regulations as well as international agreements, including anti-corruption laws.

**Offering or receiving improper benefits** – Suppliers that do business with or act on behalf of PHMG, should not give, offer, promise, request, accept or receive directly or through third parties, anything of value to or from any Government Official, private entity, individual, or a family member thereof, with the intent to persuade them or be persuaded to exploit their position for any undue advantage.

**Fraud and Other Criminal Behaviours** – Suppliers shall not violate any criminal statute or perform any illegal acts, including fraud and theft, while maintaining a business relationship with, or acting on behalf of, PHMG.

**No Retaliation and Reporting of Concerns** – Suppliers are expected to report suspected misconduct or violations of this Code of Conduct. PHMG prohibits and does not tolerate retaliation against any supplier, worker, or representative who, in good faith, raises concerns

## LABOUR STANDARD

Suppliers shall respect human rights of all workers, including fixed, temporary, migrant, student or contract workers and treat them with respect and dignity

**Child Labour** – suppliers must ensure that child labour is not used in any part of their operations or supply chain. In no case shall any child younger than 15 years of age, or under the legal age of work or compulsory schooling (whichever is higher), be employed by the supplier or work in the supplier's operations, subject to exceptions recognized by the International Labour Organization (ILO). Workers under the age of 18 shall not perform any work that is harmful to their development or health. Suppliers shall have age verification procedures in place. Any instance of child labour must be addressed through immediate corrective and remediation actions that prioritize the child's safety and well-being.

**Wages and Benefits** – Compensation paid to workers shall comply with all labour legislation applicable to wages, including minimum wage provisions, working hours, overtime and benefits law. Suppliers must ensure that pregnancy, maternity and lactation benefits, including relevant protections, leave, and accommodations, are provided in accordance with the law.

**Working Hours** – Suppliers must ensure regular and overtime working hours comply with applicable laws and overtime working hours are recorded in compliance with applicable laws, and further, that overtime working hours are voluntary and compensated at a premium rate. Suppliers must ensure that 24 consecutive hours of rest are provided in every 7-day work period. If allowed by law, 48 consecutive hours of rest in every 14-day work period are permitted.

**Freedom of Association and Collective Bargaining** – Suppliers shall respect the rights of workers to organize collectively and to do so independently, without interference, within the legal framework of the communities where PHMG operates. In communities where free and independent collective bargaining is constrained, PHMG shall respect alternative organization channels. Suppliers shall be committed to establishing a constructive dialogue with a union's freely chosen representatives and bargaining in good faith where employees or workers are represented by a legally recognized union.

**Freely Chosen Employment** – Suppliers must not permit any form of forced labour, including any form of prison, trafficked, indentured or bonded labour, in their operations or supply chain. This includes transporting, harbouring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for exploitation. All work must be voluntary, and workers will be free to leave work at any time or terminate their employment. Employment must not be dependent on payments or deposits charged to employees or workers. Pay is not withheld. Any instance of forced labour must be addressed through action to end the practice and implement remediation measures that protect affected workers' rights and wellbeing.

**Discrimination and Harassment** – Suppliers must not practice discrimination or harassment in hiring, pay, promotion, or in the workplace based on race, colour, sex, national or social origin, religion, age, disability, sexual orientation, marital status, pregnancy status, gender identity, union membership, or any other status protected by applicable law. Suppliers must prohibit all forms of violence and harassment in the workplace, including verbal, physical, sexual or psychological abuse. All employees and workers must be protected from retaliation for reporting harassment.

## ENVIRONMENT

P&H Milling Group is committed to leading the industry in minimizing the impact of its activities on the environment. We believe that everyone has a responsibility to protect the environment against negative effects. Therefore, it is the suppliers' obligation to know and comply with all applicable environmental laws, regulations and international agreements and develop plans and best practices to promote environmental sustainability. We expect that our suppliers will properly manage energy use, transportation, greenhouse gasses, emissions to air, ozone-depleting substances, water use, wastewater and effluents, waste, and hazardous and potentially hazardous substances.

## FOOD SAFETY & QUALITY

PHMG is committed to providing its customers with reliable and safe products. Therefore, PHMG expects its suppliers to always consider and manage food safety and quality in their own operations and in the supply chain. Suppliers must deliver products and services that meet the safety and quality requirements established by PHMG, in addition to those established by applicable laws and regulations where they operate.

## HEALTH & SAFETY

Suppliers shall ensure safe and healthy working conditions, using appropriate controls, safety procedures, preventative maintenance and safety equipment. All these practices must comply with applicable laws. Suppliers must provide training on safe work practices and emergency planning. Employees and workers must be provided with adequate personal protective equipment to safely carry out their duties. Suppliers must also provide adequate access to clean toilet facilities, potable water, and sanitary facilities for food storage.

## IMPLEMENTATION

This Code of Conduct is overseen by our Director of Procurement & Risk Management. It will be reviewed at least once every three years to ensure that its requirements remain relevant and implementation remains effective.

Suppliers will be requested to review PHMG Supplier Code of Conduct and return a written acknowledgment every 3 years.

## ENFORCEMENT

PHMG may conduct audits at the offices or sites of the supplier or request it from a third party, to verify compliance to this Code of Conduct and any other applicable laws. These audits may be conducted without prior notice. Suppliers shall make the best efforts to fulfill all audit requests. If there is a breach of the Code of Conduct, or any applicable law, PHMG reserves the right to take actions as necessary, including termination of any contract or business relationship with the supplier.

Any violation of this Code of Conduct should be reported to PHMG Ethics Line in a timely fashion. These complaints must be made via online reporting at <https://parrishandheimbecker.com/company/ethics-line/> or by telephone 1-888-650-7768.

*Krystle Wallis  
Director of Procurement & Risk Management  
P&H Milling Group*