



## SUPPLIER CODE OF CONDUCT

### 1. Introduction

Primary Products Ingredients Americas LLC, its subsidiaries and affiliates ("Primient") is committed to the highest level of integrity and ethical business conduct. We also believe in developing and maintaining strong relationships with those who provide goods and services to us or on our behalf ("Suppliers"). A vital part of this relationship is a commitment to the same ethical standards. We require our people to act consistently with our core values of Safety, Excellence, Growth, Integrity, which are set out in our Code of Ethics, and we expect the same from our Suppliers. This Supplier Code of Conduct (the "Code") sets out the minimum standards that we expect from our Suppliers.

All Suppliers working with Primient must either agree to comply with this Code or provide their own code of conduct, as long as it meets our requirements. Suppliers are responsible for ensuring their suppliers, representatives, agents, contractors and subcontractors are also in compliance.

If any of the requirements in this Code conflicts with applicable law, the law takes precedence. If this occurs, the Supplier must promptly inform us of the conflict.

### 2. Workplace Standards and Practices

Primient is committed to ensuring that working conditions in our supply chain are safe, that workers are treated with a level of dignity and respect consistent with International Labor Organization ("ILO") Conventions and the Universal Declaration of Human Rights, and that business operations are environmentally responsible.

#### **Non-Discrimination**

Suppliers must not discriminate against their workers or applicants for employment with respect to compensation, promotions, employment terms, conditions or privileges of employment on the basis of race, color, religion, national origin, gender, age, disability, pregnancy, political affiliation, union membership, veteran status, marital status, citizenship status, creed, sexual orientation or other protected categories as provided by applicable laws.

#### **Respectful Work Environment**

Suppliers must be committed to a workplace free of harassment. Suppliers may not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, or verbal abuse.

#### **Forced Labor**

As a company, we are subject to the California Transparency in Supply Chain Act. As part of our supply chain, we expect our Suppliers to also meet the requirements of these laws. Suppliers must not use forced or involuntary labor whether in the form of prison labor, slavery, bonded labor or any other form of human trafficking. Supplier shall not require any worker to surrender control over original identity documents or work permits.



Workers should be allowed to freely terminate employment and enjoy freedom of movement.

### **Child Labor**

Suppliers must comply with all applicable minimum age laws and requirements and will not employ “child labor”, as that term is defined by the ILO. The term “child” refers to any person under the age of 15, under the age for mandatory education, or under the minimum age for employment in the country whichever is greatest.

### **Working Hours**

Employee working hours must not be excessive and must conform to local labor laws. Employees should be granted at least one day off every seven-day period.

### **Wages and Benefits**

We expect our Suppliers to fairly and competitively compensate their employees relative to their industry and in compliance with applicable local and national wage and hours laws. Suppliers must not make deductions from employee wages that are not required by law or as agreed to in a signed contract and must not withhold compensation unless required by law.

### **Freedom of Association**

Suppliers must respect, and must not interfere with, the legal rights of workers to associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

### **Health and Safety Practices**

Health & Safety is foundational to our business – it is not an option. Suppliers must provide employees with a safe and hygienic work environment consistent with all applicable laws and regulations. As a minimum:

- Suppliers shall implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries. This includes implementing procedures to prevent, manage, track and report occupational injury and illness (including encouraging workers' reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions and facilitating workers' return to work);
- Suppliers will identify potential emergencies and will implement emergency plans and provide guidance to workers on emergency response procedures (including emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities and recovery plans);
- Risks associated with physically demanding tasks must be identified and minimized;
- Workers under the age of 18 shall not work under hazardous conditions. This means any work that involves the substantial risk of harm to the safety or health of the worker or co-workers if adequate protections are not taken;
- Suppliers shall provide access to clean toilet facilities and to drinkable water, and, if appropriate, sanitary facilities for food storage shall be provided; and
- Accommodations, where provided, shall be clean, safe, and meet the basic needs of the workers.

### **Environmental Practices**

Suppliers should be committed to sustainable development and minimizing the negative impact of their operations on the environment. Suppliers should ensure they use resources responsibly, including but not limited to energy, water, and plastics/packaging. Suppliers should be committed to ending deforestation. Suppliers should consider carbon emission reduction targets in line with the Paris Agreement.

All local environmental laws and regulations must be complied with, particularly in relation to:

- waste disposal;
- emissions;
- discharges; and
- hazardous and toxic material handling.

All required environmental permits, approvals and registrations are to be obtained, maintained, and kept current and any operational and reporting requirements must be followed.

### **3. Business Integrity**

Primient expects its supply chain to conduct business ethically, transparently and in accordance with all relevant laws. This includes compliance with the U.S. Foreign Corrupt Practices Act, Brazil's Clean Company Act of 2014 (and other relevant anti-corruption legislation), Terrorist Financing and Transfer of Funds Regulations, as well as all corresponding local laws.

#### **Bribery and Corruption**

Suppliers must not offer, promise, give or receive bribes or any other form of inducement (including cash, gifts, hospitality and entertainment), regardless of the value, with the intention or appearance of influencing a business decision or securing an improper business advantage, whether directly or through a third party. This prohibition includes facilitation payments, even where such payments are considered to be part of local business practice or acceptable under local law.

Suppliers shall implement adequate procedures to prevent employees or persons associated with its business from committing offences of bribery or corruption. The effectiveness of such procedures should be reviewed regularly to ensure that they are operating effectively.

#### **Gifts and Hospitality**

The exchange of gifts and hospitality is often used to build normal business relationships. However, it can, or can appear to, create improper influence, conflicts of interest or an unfair business advantage. In certain situations, gifts and hospitality can be considered bribery or corruption.

Suppliers must ensure that the offering or receipt of any gift or business hospitality does not violate any law and is consistent with reasonable market customs and practices.

Lavish or excessive gifts, meals, entertainment or travel expenses, must not be given or accepted particularly where they are disproportionate, frequent or provided in the context of ongoing business negotiations.

### **Conflict of Interest**

Suppliers must ensure that they supply or provide goods and/or services to Primient in an open and transparent manner. Any actual or potential conflicts of interest must be disclosed immediately. For example, if anyone working for a Supplier is closely related to a sub-contractor who the Supplier intends to recommend to us, this should be disclosed to us before any such recommendation is made.

### **Business records**

Our suppliers must create and maintain accurate books and records of transactions in compliance with all applicable laws and regulatory requirements. Appropriate accounting controls must be in place and followed.

### **Financial crimes**

Suppliers must never engage in fraud, money laundering, terrorist financing or tax evasion, or help third parties to commit these acts.

### **Fair Competition and Antitrust**

Suppliers must never propose or enter into any agreement with another Supplier or potential supplier to fix prices, terms and conditions of sale, costs, profit margins or anything similarly prohibited by law.

### **Sanctions**

Suppliers must comply with all applicable import and export control laws and regulations including sanctions, embargoes, and anti-boycott rules. Suppliers are expected to understand any sanctions, import and export control requirements relating to their work, and ensure their decisions and activities comply with those requirements.

## **4. Compliance**

Suppliers should have established systems and procedures in place to demonstrate compliance with this Code. This includes demonstrating the compliance of those in their own supply chain.

Suppliers are additionally expected to adhere to the principles outlined in the [ETI Base Code](#), which is founded on the conventions of the International Labour Organisation (ILO).

Suppliers who do not meet the requirements of this Code may be provided with the opportunity to correct the non-compliance in a reasonable timeframe. Primient reserves the right to terminate its business relationship and contract with any Supplier who fails to do so or refuses to comply with this Code.

## **5. Reporting and monitoring**

Suppliers shall report and investigate any violations of this Code in a timely manner, either directly to their Primient contact, by sending an email to [ethicsandcompliance@primient.com](mailto:ethicsandcompliance@primient.com), or by contacting our Ethics Line:



- **Website:** [www.lighthouse-services.com/primient](http://www.lighthouse-services.com/primient)
- **Toll-Free Telephone:**  
Direct Dial - NOAM
  - USA and Canada: 833-214-2479 (English)
  - USA and Canada: 800-216-1288 (Spanish)
  - Canada: 855-725-0002 (French)
  - Mexico: 01-800-681-5340 (Spanish)

Outside NOAM: Access Code Required (LATAM and Europe)

| <u>Country</u> | <u>Access Code</u> | <u>Country Code*</u> | <u>Number</u> |
|----------------|--------------------|----------------------|---------------|
| Argentina      | 0-800-222-1288     | 54                   | 800-603-2869  |
| Brazil         | 0-800-890-0288     | 55                   | 800-603-2869  |
| Poland         | 0-0-800-111-1111   | 48                   | 800-603-2869  |

\*If needed

To assist us with monitoring and assessing compliance with applicable laws and this Code, Suppliers agree, if so requested, to permit Primient or a third party chosen by Primient to make scheduled and unscheduled site visits to their premises, including to speak to their workers or review books and records related to their work with Primient, to assess compliance with any of the requirements in this Code.

## 6. Conclusion

This Code will be reviewed periodically and will be revised as necessary. Changes to the Code will be notified to Suppliers and all Suppliers shall be required to comply with new requirements as soon as practicable.