

Mennel Vendor Code of Conduct

Introduction

Mennel is committed to delivering on our promise of Quality, Uniformity, and Service. This applies to everyone within our organization. Moreover, this promise depends on businesses and individuals who partner with Mennel to deliver finished products to the world's doorstep. As such, we expect our vendors to operate in compliance with the principles outlined in this Vendor Code of Conduct (this "Code"). The term "Vendors" (individually, a "Vendor"), as used in this Code, means an entity and any of its affiliates, subsidiaries, employees, agents, suppliers, vendors, contractors, or other representatives that provide goods or services to, or on behalf of, The Mennel Milling Company and its subsidiaries and affiliates ("Mennel").

The provisions of this Code are in addition to those specified in any agreement between a Vendor and Mennel. Mennel relies on its Vendors' assurances that they are complying with this Code of Conduct. Failure to comply with the terms of this Code may jeopardize a Vendor's relationship with Mennel, up to and including termination of some or all of the services being provided by a Vendor to Mennel.

Employment and Labor

Human Rights

Mennel is committed to a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices. Therefore, Mennel expects that all Vendors' conduct, and relationships will be professional and free of bias, prejudice, harassment, and disruptive or intimidating behavior.

Freedom of Association

Mennel expects its Vendors to recognize and respect the rights of employees to freedom of association and collective bargaining.

Employment Practices

Mennel expects its Vendors to comply with all US Federal, State, and local laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Compensation, benefits, transfers, training, and participation in social and recreational programs must be provided fairly to all persons on an equal opportunity basis.

Anti-discrimination, Diversity

Mennel expects its Vendors to be committed to providing equal employment opportunities to all individuals regardless of race, color, religion, sex (including pregnancy), national origin, age, disability or genetic information, or any other characteristic protected by the EEOC. Vendors must not discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, or privileges of employment.

Underage Labor

Mennel expects that its Vendor's hiring practices and policies will be in compliance with US Federal and State standards governing minor labor laws.

Employment Status

Mennel expects its Vendors to abide by all applicable US Federal, State, and local laws governing employment and background verifications.

Compensation and Working Hours

Mennel expects its Vendors to provide its employees with accurate compensation information as to wages and benefits. Working hours and employee compensation must comply with US Federal, State, and local laws.

Culture and Ethics

Business Integrity

Mennel expects its Vendors to uphold the highest standards of integrity in all business dealings. This includes acting honestly, ethically, and in compliance with all applicable US Federal, State, and local laws and regulations. Illegal, dishonest, or unethical behavior will not be tolerated.

Gifts, Meals and Entertainment

To ensure the highest level of business integrity and fair dealing, it is expected that Vendors will not solicit, request, or accept any gratuity, kickback, free services, or special favors that would, in any way, place Mennel or Vendor in an uncomfortable or compromising position, improperly influence business decisions, or create a conflict of interest. Any such offerings must be reasonable, infrequent, and in compliance with applicable US Federal, State, and local laws and regulations, and Mennel policies.

Intellectual Property and Software

Mennel's Information Systems are intended to be used for proper business purposes consistent with all Mennel policies, including the Professional Conduct and Ethical Business Conduct Policies. The content of all Information Systems shall at all times remain Mennel property.

Privacy

In situations where Mennel and a Vendor have access to confidential and proprietary business information of one another, a non-disclosure agreement may be put in place.

As such, and consistent with any non-disclosure agreement, the confidential and proprietary business information of Mennel and Vendor should remain the property of each of them respectively and shall not be disclosed to any third party for any reason except as provided in the respective non-disclosure agreement or pursuant to a valid law, regulation, or court order.

Anonymous Complaints and Helpline

Mennel encourages reporting of all perceived incidents as outlined within the Professional Conduct Policy regardless of the offender's identity or position. Mennel maintains an anonymous 800 number for Vendors to report abuse of rules, theft, harassment, product/food safety including but not limited to: product/food integrity, quality, and legality concerns or other violations or situations which may need to be addressed. If any behaviors are observed that may violate this Code Vendors may notify Mennel by calling the Helpline at 1-800-345-0475; emailing to hr@mennel.com; or mailing a note, with relevant documents (if available), to The Mennel Milling Co., 319 S. Vine St., Fostoria, Ohio 44830, United States.

Environmental, Health & Safety

Environmental, Health and Safety Statement

Mennel expects its Vendors to recognize that safe practices, healthy working conditions, and the conservation of natural resources are essential to achieving continuity for Mennel and its Vendors. Mennel expects that its Vendors will operate facilities in a manner that protects the health, safety, and security of all employees, the public, and the environment.

Environmental, Health and Safety Protection System

Mennel expects its Vendors to maintain an Environmental, Health and Safety program in compliance with all applicable US Federal, State and local laws and regulations. Mennel reserves the right to review these programs to ensure continuous improvement and the effectiveness of these systems in meeting health, safety, security, and environmental commitments.

Working Safely

Mennel expects that its Vendors recognize their obligation to prevent incidents and injuries by conducting business in a way that actively integrates applicable Federal, State and local laws and regulations into all aspects of their operations. Vendors shall allow Mennel to rely on their experience through training and strict adherence to this Code to ensure the safety of Vendors' and Mennel's employees, partners, and surrounding communities.