

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 the more stringent of (a) US Federal, State, and local laws concerning the employment of persons with disabilities and regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC) or (b) applicable laws and regulations concerning employment practices in the jurisdiction(s) where the Vendor operates. 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 Vendors' hiring practices and policies will follow the more stringent of (a) US Federal and State standards governing minor labor laws or (b) applicable local laws and regulations governing minor labor in the jurisdiction(s) where the Vendor operates.

Employment Status

Mennel expects its Vendors to abide by the more stringent of (a) US Federal, State, and local laws governing employment and background verifications or (b) applicable laws and regulations governing employment and background verifications in the jurisdiction(s) where the Vendor operates.

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 the more stringent of (a) US Federal, State, and local laws or (b) applicable laws and regulations governing compensation and working hours in the jurisdiction(s) where the Vendor operates.

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 the more stringent of (a) US Federal, State, and local laws and regulations or (b) applicable laws and regulations in the jurisdiction(s) where the Vendor operates. Illegal, dishonest, or unethical behavior will not be tolerated.

Gifts, Meals and Entertainment

To ensure the highest level of business integrity and fair dealing, Vendors shall not offer, give, or promise to give any gift, gratuity, meal, entertainment, kickback, or anything of value to any Mennel employee, agent, or representative that could, in any way, improperly influence business decisions or create a conflict of interest. Any gift, meal, or entertainment offered to Mennel personnel must be: (a) nominal in value, (b) infrequent, (c) not offered in connection with any pending business decision or contract negotiation, and (d) in compliance with Mennel's policies. Vendors shall not solicit, request, or accept any gratuity, kickback, free services, or special favors that would place Mennel or Vendor

in an uncomfortable or compromising position, improperly influence business decisions, or create a conflict of interest. All such offerings must be 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

Vendors shall maintain the confidentiality of all confidential and proprietary business information of Mennel ("Mennel Confidential Information") received in connection with the vendor relationship, regardless of whether a separate non-disclosure agreement is in place. Vendors shall: (a) use Mennel Confidential Information solely for purposes of performing services for or conducting business with Mennel; (b) limit access to Mennel Confidential Information to Vendor personnel with a legitimate need to know; (c) not disclose Mennel Confidential Information to any third party without Mennel's prior written consent; and (d) promptly notify Mennel in writing upon becoming aware of any unauthorized access, use, or disclosure of Mennel Confidential Information. All Mennel Confidential Information shall remain the sole property of Mennel. If a Vendor is compelled by law, regulation, or court order to disclose Mennel Confidential Information, Vendor shall, to the extent permitted by law, provide Mennel with prompt advance written notice of such requirement to allow Mennel to seek a protective order or other appropriate remedy. Any additional confidentiality obligations set forth in a separate non-disclosure agreement between Mennel and Vendor shall supplement, and not limit, the obligations set forth in this Code.

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.

Audit and Verification Rights

Mennel reserves the right to audit, inspect, and verify Vendor compliance with this Code at any time upon five business days' advance written notice to Vendor. Such audits may include, without limitation, on-site inspections of Vendor's facilities, review of records and documentation, and interviews with Vendor personnel. Vendor shall cooperate fully with all audit activities and shall provide Mennel and its representatives with complete access

to all relevant facilities, records, documents, and personnel as reasonably requested by Mennel.

Mennel may conduct audits using its own personnel or third-party auditors selected by Mennel in its sole discretion. Each party shall bear its own costs and expenses associated with any audit conducted under this Section.

If any audit reveals non-compliance with this Code, Vendor must promptly implement a corrective action plan that is acceptable to Mennel. Such corrective action plan shall include specific remedial measures, responsible parties, and completion deadlines as determined by Mennel. Vendor shall provide Mennel with regular written progress reports on the implementation of any corrective action plan.

Mennel may conduct unannounced audits if Mennel has a reasonable basis to believe that a violation of this Code has occurred or is occurring. Failure by Vendor to cooperate fully with any audit or to implement corrective actions in accordance with an approved corrective action plan may result in immediate termination of the vendor relationship and any associated agreements between Mennel and Vendor.

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 the more stringent of (a) US Federal, State, and local laws and regulations or (b) applicable laws and regulations in the jurisdiction(s) where the Vendor operates. 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 the more stringent of (a) US Federal, State, and local laws and regulations or (b) applicable laws and regulations in the jurisdiction(s) where the Vendor operates 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.