



## FOREMOST FARMS SUPPLIER CODE OF CONDUCT

Foremost Farms USA's ("Foremost Farms") purpose is to Bring Dairy to Life. We are guided by our values to Work with Integrity, Work as One Team, be a Force for Good, and Take Care of our World to fulfill our mission of bringing safe, nutritious, and sustainable milk products to the marketplace. These principles extend to the stakeholders in which we conduct business to ensure the behaviors, decisions, and responsibilities of our business partners align with the values set forth by Foremost Farms. Our consumers, customers, members, employees, and stakeholders trust us to conduct our business with honesty and integrity, and that trust extends to the partnered suppliers in which Foremost Farms conducts business with.

This Supplier Code of Conduct (the "Code of Conduct") describes the requirements and ways of working that Foremost Farms applies to its suppliers. In some cases, this Code of Conduct goes beyond compliance with applicable laws, integrating internationally recognized standards to advance social and environmental responsibility in Foremost Farms' supply chain.

We expect all suppliers, including direct and indirect suppliers of goods and services, contractors, and service providers, to comply with this Code of Conduct and the expectations it sets forth in their business activities. We also expect all suppliers to escalate expectations consistent with this Code of Conduct to their business partners and subcontractors. Violations of this Code of Conduct may jeopardize the supplier's business relationship with Foremost Farms, up to and including termination. Through receipt of the Code of Conduct, the supplier acknowledges that all existing and future agreements and business relationships with Foremost Farms will be subject to the provisions included.

Suppliers must comply with our Code of Conduct and our Four Pillars of Responsible Sourcing:

- Business Integrity
- Human Rights
- Health and Safety
- Environmental Responsibility

## BUSINESS INTEGRITY

Foremost Farms is committed to the highest ethical standards and to conducting its business with the highest level of integrity.

Suppliers must operate with the utmost standards of business integrity and comply with all laws and regulations of the countries of their operation.

At a minimum, our suppliers shall uphold these business integrity standards:

### Anti-Corruption and Anti-Bribery

Suppliers must adhere to all relevant anti-bribery and anti-corruption laws, regulations, and guidelines including but not limited to the United States Foreign Corrupt Practices Act (FCPA). Suppliers are strictly prohibited from offering or accepting any bribe, kickback, or courtesy, or using any improper influence when dealing with government officials or in any business arrangements.

### Confidential Information and Intellectual Property

Suppliers may not use or reveal Foremost Farms' confidential or proprietary information to others. Suppliers shall respect intellectual property rights and safeguard confidential, proprietary, and protected information. To prevent unauthorized access to information, suppliers must take appropriate steps to manage technology, including securing documents, and limiting access to computers and electronic media.

### Conflicts of Interest

Suppliers must avoid any situation, relationship, or arrangement that conflicts with Foremost Farms's interests or compromises the ability to ethically fulfill contractual obligations to Foremost Farms. Suppliers are expected to report any actual, potential, or perceived conflicts of interest. Please refer to the **ETHICS and COMPLIANCE REPORTING** section at the end of this Code of Conduct for information on how to report potential concerns.

An example of "conflicts of interest" is:

- Foremost Farms' sourcing representative awards business based on owning shares in a company or having a family member employed by the supplier.

### Disclosure of Information

Suppliers must provide accurate and complete information and obtain authorizations where necessary. Suppliers will not knowingly report or publish false or otherwise inaccurate information via press release, product or service advertisements, or by any other means.

### Sustainability

Suppliers shall contribute to sustainable development by integrating environmental, social, and governance considerations into all business decisions, functions, and work processes.

## **HUMAN RIGHTS**

Foremost Farms is committed to the protection of human rights throughout our supply chain. This protection applies to all individuals. Foremost Farms endorses the principles of the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations' Guiding Principles on Business and Human Rights.

At a minimum, our suppliers shall uphold these human rights standards:

### Anti-Discrimination and Fair Treatment

Suppliers shall treat all employees with respect. There will be no unlawful discrimination, harassment or abuse of any kind based on race, creed, color, religion, sex, age, national origin, disabilities, veteran status, marital status, sexual orientation, military status, genetic information, or any other characteristic protected by state or federal law.

### Child Labor

Suppliers shall not employ children under the age of 15. Foremost Farms supports temporary workplace internship and apprenticeship education programs for younger persons, employment on family-owned farm operations, and customary seasonal employment so long as persons are closely supervised and their morals, health, safety, and compulsory education are not compromised in any way.

### Forced Labor

Suppliers shall not use involuntary, enslaved, forced, prison, or debt bondage labor of any kind. Suppliers shall not be involved in human trafficking activity and shall not use any corporal punishment, physical or psychological abuse, or threats of violence, or coercion to secure or retain their workers.

### Freedom of Association and Collective Bargaining

Suppliers shall recognize and respect the rights of employees to freedom of association and collective bargaining. Suppliers shall ensure that representatives of trade unions are not subject to discrimination or harassment.

### Wages and Benefits

Suppliers will provide workers with pay and benefits as required by law, including compliance with minimum wage and overtime requirements and will pay employees promptly.

## **HEALTH AND SAFETY**

Foremost Farms is committed to conducting our operations in a safe and healthy manner.

Suppliers shall meet or exceed all applicable health and safety laws, regulations, and industry standards. Suppliers shall provide workers with a safe, clean, and healthy work environment.

At a minimum, our suppliers shall uphold these health and safety standards:

### Investigation and Emergency Response

Suppliers shall empower employees to identify hazards and unsafe work practices and administer processes to record and investigate accidents and first-aid events. Suppliers must implement and train their employees on safe work practices and procedures.

### Product Safety and Quality

Suppliers shall supply only products or services that meet or exceed food safety and quality standards required by applicable law and outlined in Foremost Farms' Food Safety and Quality Policies. Suppliers must report any concerns about product safety or quality issues to Foremost Farms.

### Safe Working Environment

Suppliers must commit to maintaining and promoting a safe, healthy, and injury free work environment for all employees, contractors, visitors, and any other stakeholder who may be affected by your business operations. Suppliers shall issue employees with all necessary personal protective equipment to protect their health, safety, and welfare.

## **ENVIRONMENTAL RESPONSIBILITY**

At Foremost Farms, our goal is to continually reduce the environmental footprint associated with our finished dairy products.

In addition to complying with all applicable environmental laws, we expect suppliers to continually reduce the environmental impact of their business and associated products.

At a minimum, our suppliers shall uphold these environmental standards:

### Animal Care

Suppliers of dairy-based products or ingredients shall ensure milk is procured only from sources compliant with the National Milk Producers Federation Farmers Assuring Responsible Management (FARM) Animal Care Program or an equivalent recognized standard that includes third-party validation of animal care practices.

### Environmental Impact

Suppliers must continually commit to address and mitigate the impacts of their business on air, biodiversity, climate, land, soil, and water.

## Natural Resources

Suppliers must continually protect and conserve natural resources in their operations by optimizing use of resources like water, energy, and raw materials, avoiding resource contamination, and reducing the impact on resources of the surrounding communities.

## **COMPLIANCE**

### Audits, Assessments, and Compliance

Foremost Farms may audit compliance with this Code of Conduct. Suppliers must respond within the allotted time to all audits, assessments, and document requests from Foremost Farms related to the delivery of their products or services. Foremost Farms expects suppliers to act to correct compliance issues.

### Whistleblower Protection

Suppliers will provide an anonymous complaint mechanism for their employees to report possible violations of this Code of Conduct and the supplier's own Code of Conduct. Supplier will protect whistleblower confidentiality and prohibit retaliation.

## **ETHICS and COMPLIANCE REPORTING**

To report a concern related to Foremost Farms' business, suppliers or their workers shall utilize Foremost Farms' email. Below is Foremost Farms' ethics and compliance email and provides an impartial, safe and secure, confidential conduit to alert us to errors and wrongdoing.

**To submit a report by email: [SupplyChainCompliance@foremostfarms.com](mailto:SupplyChainCompliance@foremostfarms.com)**