



Supplier Code of Conduct

Mission and Purpose

Simple Mills is on a mission to revolutionize the way food is made to nourish people and the planet. As a mission-based organization, we care deeply about personal health and well-being and making a positive impact on the food supply chain. Our impact on the food supply chain requires not only our action and adherence to high standards, but the commitment of our supply chain partners to both comply with all applicable laws and regulations, as well as abide by the tenants of our Supplier Code of Conduct. This document outlines minimum expectations of our supplier partners related to labor standards, the environment and ethical business practices.

Compliance with Applicable Laws and Regulations

Suppliers shall at all times comply with all laws applicable to the operation of its business, including any regulations or ordinances in effect in any local regions in which it does business. Suppliers shall also ensure that their partners, third-party agencies, and sub-contractors comply with all laws and regulations in practices relevant to their businesses and requirements in line with this Code of Conduct. If there is a discrepancy between what the law requires and the standards of this Supplier Code of Conduct, it is expected that suppliers will meet the higher standard. This Code of Conduct is based in part on the standards outlined by the International Labour Organization and the Fair Labor Association.

Continuous Improvements

We require all of our Suppliers to abide by the policies set forth in this Code of Conduct and by applicable law, but we encourage our Suppliers to seek to adopt and implement policies that exceed these requirements and seek to continuously improve labor conditions and environmental protections as a member of the global supply chain community.

Human Rights

Suppliers shall respect the human rights of workers within their operations and supply chain, especially at-risk groups. Suppliers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor standards, laws and regulations.



No Child Labor

Simple Mills does not tolerate child labor. Suppliers must act in compliance with all laws, and in accordance with International Labor Organization (ILO) standards, regulating minimum working age for each position. All workers must meet the minimum age established by applicable law. If the applicable law does not set a minimum age, all workers must be at least fifteen (15) years old. Suppliers must implement and maintain a system of verifying the age of all workers in accordance with local law. Additionally, suppliers must assess and monitor any third-party entity which assists them in recruitment or hiring, to ensure those entities are adhering to the same standards and have systems in place that meet or exceed their own practices. We expect that no individual under the legal age, as defined by law, will be employed, either directly or indirectly, by the supplier.

Suppliers shall not, and shall ensure that its partners do not, support or engage in, or require any hazardous labor to be performed by any person under the age of 18. Hazardous labor involves any work, that by its nature or the circumstances in which the work is undertaken, involves the risk of harm to the safety or health of the worker or coworkers if adequate protections are not taken, and includes but is not limited to work at dangerous heights or in confined spaces; work with hazardous substances, dangerous machinery, equipment and/or tools; work that involves the manual handling or transport of heavy loads; and night work. Where work is performed by workers under 18 there must be appropriate safeguards not to jeopardize their health and safety and the work may not compromise their education.

No Forced Labor or Human Trafficking

All labor must be voluntary, free from coercion and deception. There shall be no use of forced labor, including prison, indentured, bonded, slave or other forms of forced labor in any part of its supply chain. Acts of human trafficking are prohibited. Suppliers shall monitor any third-party entity which assists them in recruiting or hiring employees, to ensure that people seeking employment at their facility are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views. We do not condone holding workers' passports or other personal documents, the charging of any type of fee, deposit, payment for being hired or as a condition of their employment to those seeking employment by suppliers (or by labor agents or brokers acting on behalf of the supplier), or engaging in deceptive recruitment practices.

Employees' legal status shall be verified. Only employees with valid work authorization issued by an appropriate legal authority shall be hired. Where required by law, employees shall be provided with a written employment contract outlining the terms of employment. In lieu of an employment contract where this is not required by law, key terms and conditions need to be communicated to and agreed with workers in a language they understand, and where workers



migrate for the purpose of the employment this needs to be done prior to departure of their home country.

Freedom of Association and Collective Bargaining

Suppliers shall recognize and respect each worker's freedom of association and rights to engage in collective bargaining and join - lawful organization of their own selection. Where legally required suppliers shall establish worker committees. Suppliers must respect these rights by maintaining a professional environment free from fear of reprisal, intimidation, or harassment.

Wages and Benefits

All workers, including foreign and domestic migrant workers, are to be provided wages, benefits and working conditions that are fair, timely paid, comparable to local workers and in accordance with local law. Wages are to be paid in full, at a monthly or shorter interval and directly to the worker. Where there is a legal minimum wage, all workers including those paid by piece rate must receive this based on a standard working week of 48 hours or less.

Working Hours

Suppliers shall ensure their working hours adhere to the law of the country where the workers are employed and not surpass 48 standard working hours and 60 hours including overtime per week. Suppliers shall further ensure 1 day of rest in any 7-day period and reasonable breaks. Where required by law leave must be available to workers.

Workplace Health & Safety

Suppliers shall provide a safe and healthy workplace, including setting and implementing procedures and safeguards to prevent workplace hazards, accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of suppliers' facilities. The employer shall take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents and injuries and to protect worker health.

No Discrimination, Abuse, or Harassment

No person shall be subject to any discrimination, abuse or harassment in any aspect of the employment relationship. All employment decisions must be made based on the principle of



equal employment opportunity, and shall include effective mechanisms to protect all workers against any form of discrimination including those based on legally protected characteristics. Suppliers shall treat all employees with dignity and respect.

Anti-corruption, Anti-bribery, and Ethical business practices

We do not tolerate corruption in any form and we expect the highest standards of integrity in our suppliers. Suppliers are expected to comply with all applicable anti-corruption and anti-bribery laws, including, without limitation the Foreign Corrupt Practices Act (“FCPA”). We expect our suppliers not to engage in any form of bribery, corruption or other actions that amounts to requesting, accepting, giving or offering anything of value to or from anyone to reward improper performance or obtain an unfair business advantage.

Anti-Retaliation

Suppliers shall prohibit retaliation against employees who report a compliance or ethical issue learned during the course of work, or who cooperate in good faith with the investigation of a complaint.

Diversity, Equity, and Inclusion

Simple Mills recognizes that inequities and injustices continue to exist in our communities, within the business sector, and throughout the world. Through our partners and practices, we seek to create and promote an environment, both internally and externally, of inclusion for all peoples, promoting diversity of thought, experience, background, and identification. We expect our Suppliers to respect and value diversity in their business policies, culture, and practices.

Supply Chain Transparency & Accountability

Suppliers must be capable of mapping products or services provided to Simple Mills back to the origin or working on a plan to enable supply chain transparency. Similar standards around a Code of Conduct shall be upheld with your own suppliers and subcontractors.



Environment

Suppliers shall adopt responsible measures to mitigate negative impacts that their business has on the environment. Simple Mills is working to have a positive impact on the planet, and as such, may require information regarding sustainability metrics and plans, such as greenhouse gas (GHG) emissions, energy and water use to enable proper reporting and development of sustainability action plans.

In pursuit of Simple Mills' mission and investment in regenerative agriculture, we also encourage suppliers to continuously improve their upstream visibility for the value chains they interact with. As such, Simple Mills may require information regarding the agricultural origin of the materials they sell to Simple Mills and the sourcing and farming practices of their supplier(s). If a supplier is unable to provide information on a material's agricultural origin, they must provide a plan that outlines their path to compliance.

Documentation and Audit

Suppliers must maintain documentation of and be able to demonstrate compliance with this Code of Conduct upon our request, and we expect you to take action to correct any non-compliance. Simple Mills may request an audit, questionnaire, or your policies to demonstrate compliance to these standards. We reserve the right to terminate any agreement or arrangement with you if compliance with this Code of Conduct or any applicable laws or regulations cannot be demonstrated. Simple Mills may update this Supplier Code of Conduct from time to time.

Grievance Mechanism

Suppliers shall provide an effective grievance mechanism that is communicated to and trusted by workers. Anonymous and confidential ways to raise grievances shall be provided to all workers including indirect or subcontracted workers. Incidents raised shall be impartially investigated, grievances shall be effectively resolved where possible, addressed within reasonable timeframes and outcomes communicated to workers.

Confidential Reporting

A confidential ethics hotline is available as part of Simple Mill's ongoing efforts to ensure compliance with our Supplier Code of Conduct and other legal contracts and policies. To report a concern, talk to your Simple Mills representative or contact our ethics hotline using the below methods:

To file a report, provide client code **SMills** and simply do one of the following:

- Visit www.RedFlagReporting.com and click on "File a Report"
- Call 1-877-647-3335



- Text RedFlagReporting to 234-231-9005
- You may also use the following (be sure to be detail oriented, provide our client code, and indicate if you wish to be anonymous our not):
 - Fax to 330-572-8146
 - Email to redflag@redflagreporting.com
 - Mail to RFR, P.O. Box 4230, Akron, Ohio 44321

Please know that the web site, texting option and live operators are available 24/7, and you can choose to be anonymous or not with all methods. When using web, text, or phone reporting you will be informed as to whom within our organization the report will be routed to for resolution, and you will be able to prevent access to any individual if they are involved in the concern. If you do prevent access, that person will not be notified by Red Flag Reporting that the report was filed. In all instances, someone at our organization will be notified and our organization, not Red Flag Reporting, will be responsible for responding to your concern. Finally, this service is not for “9-1-1” type emergencies, which should be handled directly by calling 911.

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