



## SUPPLIER CODE OF CONDUCT

### PURPOSE OF THE POLICY

This Supplier Code of Conduct (“**Code**”) sets forth The Giorgi Companies Inc.’s (the “**Company**”) expectations toward all suppliers, vendors, contractors, and consultants from whom the Company purchases goods or services (“**Suppliers**”). We expect Suppliers (and their suppliers) to comply with the following requirements, treating them as minimum standards for compliance with the Company’s Supplier policies.

The Company expects its Suppliers to either have comparable policies or to adopt this Code to ensure that the products and materials they source are responsibly produced as well.

### SCOPE

This Supplier Code applies to all Suppliers of the Company and its direct and indirect subsidiary and affiliated companies, including:

- Can Corporation of America, Inc.
- Giorgio Fresh Co.
- CF Logistics, LLC
- Giorgio Foods, Inc.
- Giorgi Mushroom Co. and its subsidiaries
- Maiden creek Plaza Co.

### POLICY CONTENT:

#### I. Management, Ethics, and Legal Compliance

The Company strives to conduct its business ethically and in compliance with all applicable laws, and it likewise expects its Suppliers (and their suppliers) to do the same. Specifically:

1. Suppliers shall conduct their business with integrity and shall compete fairly, complying with all relevant laws and regulations of all countries in which they operate, including laws covering antitrust, trade compliance, anti-corruption, and fair competition laws.
2. Suppliers shall not give or propose bribes or anything which has value to government officials, private persons, politicians, or any other party in order to obtain or retain business or favorable treatment.
3. Any form of bribery to obtain, influence, or retain Company business is strictly prohibited.

4. Suppliers must avoid any interaction with Company employees that may conflict or appear to conflict with the ability of those employees to act in the best interest of the Company.
5. Suppliers are expected to ensure that the sourcing of the products or services supplied to the Company do not finance or benefit terrorist or similar groups.
6. Suppliers should have a management system in place that ensures: (a) compliance with all applicable laws and regulations; and (b) application of the same requirements and expectations to their suppliers.

## **II. Integrity in Financial Reporting**

Suppliers shall comply with all applicable legal and regulatory requirements regarding accurate financial reporting and follow generally accepted accounting practices.

## **III. Human Rights and Labor Laws**

The Company's commitment to integrity begins with complying with all applicable laws, rules, and regulations regarding human rights and labor. The Company likewise expects its Suppliers (and their suppliers) to do the same.

### *Responsible Labor Practices and Treatment of Employees:*

1. Suppliers shall respect the rights and dignity of every individual involved in their business.
2. Suppliers shall prohibit any discrimination or harassment during recruitment, or in day-to-day activities, on the basis of race, ethnicity, gender, skin color, religious affiliation, sexual orientation, political beliefs, union membership, age, state of health, pregnancy status, marital status, veterans status, disability, or any other protected class, and Suppliers shall maintain procedures in order to eliminate such events.
3. Suppliers shall ensure that employees and prospective employees are not subject to harsh or inhumane treatment, and that their organization complies with applicable laws regarding working conditions and the treatment of employees.
4. Suppliers shall comply with all applicable laws regarding work hours, overtime, wages, and benefits.
5. Suppliers shall respect the UN Universal Declaration of Human Rights, the UN Global Compact, and the fundamental Conventions of the International Labour Organisation (ILO).

### *Freedom of Association:*

1. As provided by applicable laws, Suppliers must respect the rights of employees (and the employees of their suppliers) to freely associate, join or not join labor unions, seek representation and have a voice regarding working conditions without fear of retaliation.

### *Child Labor:*

1. Suppliers must comply with all applicable child labor laws in all countries in which they operate.
2. Suppliers shall ensure that their respective organizations and supply chains adhere to the minimum employment age limit defined by national law, applicable regulation, and the relevant Convention of the International Labour Organisation (ILO).

### *Forced Labor, Modern Slavery, and Human Trafficking:*

The Company has a zero-tolerance policy toward slavery and human trafficking within its supply chains and expects all Suppliers to have a similar policy. In particular:

1. Suppliers shall adhere to all applicable international and national laws and regulations regarding the prevention and non-tolerance of human trafficking.
2. The Company requires all Suppliers to comply with all laws regarding slavery and human trafficking. To that end, the Company may require periodic supplier certification of such compliance and may also require that its Suppliers implement other reasonable actions to ensure compliance with these laws (in particular, the California Transparency in Supply Chains Act of 2010).
3. Suppliers shall ensure that their employees and agents may freely choose their employment and that debt-bondage and forced, unpaid, or slave labor is prohibited within their supply chains.
4. Suppliers shall ensure that they do not procure goods from places or entities that have been suspected of forced, or exploitative labor, and shall make sure that they comply with all applicable laws regarding the importation of goods from such areas and entities.

### *Conflict Minerals:*

1. Suppliers shall inform the Company if conflict minerals (Gold, Tantalum, Tin, and Tungsten) are key components of any products delivered to the Company. Select Suppliers might be asked to submit the Conflict Minerals Reporting Template (developed by the Responsible Minerals Initiative (RMI)) to ensure the mining of such minerals does not perpetuate conflict.

### *Non-Retaliation:*

1. The Company does not tolerate retaliation against any person that shares good faith concerns about ethical, human rights, or compliance issues. The Company requires that Suppliers (and their suppliers) have similar non-retaliation programs in place to ensure the protection of employees and others who report improper conduct of employees, employers, customers, or suppliers.

## **IV. Occupational Health and Safety**

The Company is dedicated to a “safety first” philosophy with safety being a core value. The Company is committed to compliance with all applicable laws and regulations concerning health and safety and expects the same commitment from its Suppliers and their supply chains. Specifically:

1. Suppliers shall ensure compliance with all applicable laws and regulations on worker and workplace safety.
2. Working conditions in Suppliers’ organizations should allow for safe working practices and support the occupational health of employees.
3. Suppliers shall maintain management systems in place to prevent, track, manage, and report occupational injury and illness.

## **V. Natural Environment and Social Responsibility**

1. Suppliers are expected to comply with all relevant laws concerning the protection and stewardship of the environment, relevant to their businesses and industries.

2. Every Supplier shall strive to continuously minimize the adverse environmental impacts of its activities, products, and services through responsible environmental management, including, but not limited to:
  - Judicious use of scarce natural resources, energy, and water;
  - Compliant emissions to air and discharge to water;
  - The elimination of potential and actual soil erosion or contamination;
  - Waste reduction and the reuse and recycling of waste that cannot be reduced to the extent practicable; and
  - The protection of nature and natural resources.
3. The Company highly encourages innovation and the use of natural products and Suppliers shall strive to improve the sustainability of the goods and services provided to the Company.

## **VI. Food Safety and Product Quality**

The Company follows specific procedures to ensure that our products meet rigorous food safety and good manufacturing standards. The Company expects:

1. Suppliers to meet generally recognized and contractually agreed on quality requirements in order to provide goods and services that meet or exceed the Company's quality and safety standards for their intended use; and
2. Suppliers to label their products accurately and to take appropriate action if they become aware of anything that suggests that a product, process, or situation may pose a danger to health and safety or constitutes the sale of an adulterated or mislabeled product.

## **VII. Information Security**

1. Supplier must comply with all applicable data protection, privacy and information security laws and with relevant Company privacy and security policies.
2. Supplier must use appropriate technical and organizational measures to protect Company information (including Personal Data).
3. Supplier must notify Company in writing immediately (not later than 24 hours) of actual or suspected data breaches, unauthorized access or any other violations connected with information or data protection laws.

## **VIII. Confidentiality**

The protection of confidential and proprietary information and trade secrets is vital to the interest and success of the Company. Suppliers are expected to protect all such information using commercially reasonable means.

All non-public information relating to the Company's businesses, properties, shareholders, business plans, organization, financial affairs, manufacturing processes, pricing, components, budgets, and all other Company affairs is the Company's proprietary and confidential information. Suppliers shall ensure that such information is kept confidential and shall safeguard the intellectual property of the Company's employees and business partners. Any such information shall not be disclosed to third parties unless the Company has authorized the Supplier to such disclosure in writing.

## **IX. Right to Audit**

Each Supplier must be able to demonstrate compliance with this Code upon request. The Company reserves the right to request periodic audits, or request the results of audits conducted by others, to ensure compliance with this Code.

## **X. Non-Compliance**

Any violations of or non-compliance with this Code must be reported to the Company's Chief Legal and Compliance Officer, Michael Rettig, who is reachable at: [mrettig@giorgiglobal.com](mailto:mrettig@giorgiglobal.com). All such reports will be treated as confidential to the extent permitted by applicable law.

If cases of non-compliance are found, the Company and its Suppliers will work on eliminating the same within a reasonable time frame. A Supplier's lack of commitment to implement corrective measures and achieve compliance may result in the Company terminating its business relationship with the Supplier.