



## DONALD'S FINE FOODS

### SUPPLIER CODE OF CONDUCT

Donald's Fine Foods and its affiliated companies, including Britco Pork Inc., Thunder Creek Pork Inc., North 49 Foods Ltd, Five Corners Meat Company Ltd., and Five Corners Meat Company (Alberta) Ltd. (collectively, the "Company" or "Donald's") strongly believes in the values of honesty, integrity, accountability, ethical behaviour, and quality relationships with all our stakeholders, which include our team members, customers, suppliers, farmers, and communities.

This Supplier Code of Conduct ("Code") outlines our standards and expectations of all vendors and suppliers ("Supplier") who supply goods and services to Donald's including subcontractor and agents, ensuring that they maintain a safe supply chain, conduct themselves in an ethical and environmentally responsible manner, treat all employees with respect and dignity, and comply with all applicable laws and regulations. Suppliers must ensure that they and their subcontractors or suppliers fully comply with this Code in all parts of their supply chain.

This Code will be reviewed annually; however, changes may occur throughout the year based on applicable laws and regulations and Donald's requirements.

#### **Laws and Regulations**

Suppliers are expected to conduct their business and operations in complete compliance with all applicable laws and regulations in the countries they operate and conduct business in, and with this Code and any other policies, guidelines and requirements of the company. This includes, but is not limited to the following:

- a) ***Anti-Bribery and Anti-Corruption Laws***: Suppliers are not to be involved in bribes or offer improper inducements of any kind to public and government officials and any private industry individuals for any purpose. The use of funds, assets, or personnel for any unlawful, improper, or unethical purpose is prohibited.
- b) ***Anti-Laundering Laws***: Suppliers are not to be involved in or participate in the execution of transactions that involve in eventually converting illegally obtain funds into legal funds.
- c) ***Antitrust Laws***: Adhere to and conduct business in full compliance to all antitrust and fair competition laws that apply.
- d) ***Trade Laws***: Ensure that all trade laws and regulations, including export and import, are followed.

The expectation is that the Supplier with adhere to the greater standards of applicable laws and regulations and this Code. In the event that the requirements within this Code contradicts applicable laws and regulations within the countries the Supplier operate in, then the applicable laws shall be adhered to. However, the Supplier must immediately notify Donald's immediately in writing to determine if there are any violations of this Code.

#### **Ethical Behaviour**

Suppliers are expected to maintain the highest standards of ethics in areas of their business including but not limited to:

- Neither receive nor offer any payments, gifts, or favours (whether actual or perceived) to Donald's directors or employees or any third party in exchange for business opportunities.
- Disclose any actual or perceived conflict of interest that come up from business or personal relationships with Donald's customers, suppliers, business associates, employees, or competitors.
- Protection of intellectual property rights and avoidance of any unlawful or misuse of all trademarks and patents, including those owned by Donald's.
- Ensure safeguarding of confidential and personal information obtained in regards to employees, suppliers and customers.
- Comply with all contractual confidentiality obligations between the Supplier and Donald's. Suppliers may not use any information for personal gain or benefit. Any disclosure of any confidential information must not occur without Donald's consent.

## **Product Quality and Food Safety**

Donald's has always maintained an unwavering commitment to product quality and food safety. Delivering on this promise requires a commitment at every step of our production process and supply chain. To support our promise of safe high quality products, we expect all Suppliers to hold the same commitment to food safety and quality and are required to maintain high standards and measures to mitigate any food safety issues in their business, comply with all Donald's product and quality standards and all food safety laws and regulations, and notify Donald's of any actual or potential product quality or safety issue.

## **Animal Care and Welfare**

At Donald's, we take the care of farm animals - from farming to transportation to harvesting – very seriously. We are committed to the humane treatment of animals and have a zero-tolerance for animal abuse. We firmly believe that good animal husbandry practices and humane handling are ethical responsibilities and deliver many benefits, including improving the quality of our products.

The responsibility for and the commitment to high standards for animal care is shared among our employees and service providers. All Suppliers must share this commitment and must operate in all comply with all applicable animal welfare laws, regulations, codes of practice, and all animal welfare programs. Suppliers must conduct internal and third party audits, animal welfare training, and on-site surveillance to ensure compliance.

## **Health and Safety**

The health and safety of our employees is one of Donald's core values and plays a critical part in the job satisfaction, employee retention, and ultimately the quality of our products. To further support our core values, we require that all Suppliers provide a health and safe work environment to all employees in every part their business. This includes:

- Compliance with all applicable labour and safety laws, regulations, and standards.
- Providing and ensuring that all required personal protective equipment are used by employees and visitors to any Supplier facility.
- Providing ongoing occupational, health and safety training to employees and visitors.
- Ensuring that adequate emergency plans and response procedures are in place and communicated to all employees and visitors.
- Machinery and equipment are properly maintained to mitigate any safety hazards.

## **Environmental**

Donald's is committed to environmental stewardship and giving back to our communities. We strongly feel it is our responsibility as a partner in our communities to reduce the amount of materials going into landfill and ensure we do the best possible to reduce our carbon footprint. Suppliers must recognize the importance of environment responsibility and are expected to support this commitment by complying with all applicable environmental laws and regulations and continually make improvement to manage this responsibility, including but not limited to energy consumption, greenhouse gas emissions and carbon footprint, deforestation, bio-diversity, marine ecosystem maintenance, and waste management.

## **Labour and Human Rights – Labour Standards and Human Rights**

At Donald's, we are committed to treating everyone with dignity and respect and strongly believe that human rights are rights inherent to all human beings, regardless of race, gender identity, sexual orientation, physical handicap, nationality, ethnicity, language, religion, or any other status. This applies to all workers, whether direct, contract, temporary, foreign or migrant, student, and all other types of workers. Suppliers are expected to share this commitment and comply with all applicable labour and human rights law and regulations.

- a) ***Child Labour***: Suppliers must not use child labour and comply with all applicable labour laws at all times, ensuring that all employees will be of legal age established by local laws. In that local labour laws do not set a minimum age, employees must be at least eighteen (18) years old as evidenced by official and verifiable documentation of each of your employee's date of birth.
- b) ***Forced Labour or Physical Coercion***: Employment must be voluntary at all times. Donald's will not tolerate any practice of forced or involuntary labour, bonded, indentured, or slave labour or the use of physical or mental coercion or corporal punishment. Any form of human trafficking is further prohibited and shall not be used in any form of employment with the Supplier's business.
- c) ***Respectful Workplaces***: Suppliers must ensure that they provide a work environment in which all employees are treated with dignity and respect and where diversity and inclusion are valued. Workers must be treated fairly without fear harassment, retaliation, or discrimination by reason of race, gender identity, sexual orientation, physical handicap, nationality, ethnicity, language, religion, or any other status.
- d) ***Compensation and Work Hours***: Compensation paid to employees, including minimum wages, benefits and overtime must comply with all applicable employment and labour laws. In countries that set a maximum work week, the Supplier will ensure compliance with those requirements.
- e) ***Freedom of Association***: Employees must have the right to freely associate, organize, and to legally bargain collectively.

## **Supply Chain**

Suppliers must ensure that all employee, suppliers, contractors, agents, and all other people, companies, or organizations, must adhere to all parts of this Code. Upon request, Suppliers will be required to provide all policies, practices, and actions that are in place and that have been completed to ensure that all parties involved in their supply chain are meeting all the requirements in this Code, including but not limited Forced Labour and Child Labour.

## **Violation of This Code**

Suppliers are expected to report any known, suspected, or potential violations to this Code. Violations to this Code may either result in termination of the business relationship with Donald's or may require corrective action by the Supplier depending on the investigation and the effectiveness of any implemented corrective action. Please report any actual or potential violation to this Code may be made anonymously to [confidential@donaldsfinefoods.com](mailto:confidential@donaldsfinefoods.com) or by calling (236) 473-2132.

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