

# Griffith Foods' Human Rights Policy

#### 1. Our Commitment

Griffith Foods' purpose is to blend care and creativity to nourish the world. This purpose is built upon our value of caring for our people and we are committed to upholding and protecting human rights everywhere as our people – our employees, suppliers and partners – are our most valued asset.

Griffith Foods is committed to protecting and respecting the human rights of our employees and all individuals throughout our global value chain, regardless of gender. Our policy is guided by the Universal Declaration of Human Rights; the International Labour Organization (ILO)'s Fundamental Principles and Rights at Work; and the Convention on the Elimination of Discrimination Against Women. We endorse and support the UN Guiding Principles on Business and Human Rights, which were established to prevent, address and remedy human rights abuses in global business operations. Griffith Foods and its Chair will become signatories to the World Business Council for Sustainable Development (WBCSD) CEO Call to Action for Business Leadership on Human Rights in 2020 and take seriously our pledge to uphold the UN Guiding Principles.

This commitment contains overarching principles that we live every day through our policies, practices and business systems.

### 2. Policy Objectives

### a. Our Employees and Workers

Griffith Foods is committed to promoting and ensuring an equitable, safe and inclusive workplace. We value the unique contributions of our employees and workers around the world, regardless of gender, and strive to support each individual's pursuit of their purpose and potential.

Our commitment to human rights starts with our Code of Ethics and Business Conduct, which serves as our foundation for outlining our behaviors expected from each employee. Every Griffith Foods employee receives a copy of our Code of Ethics and Business Conduct and commits in writing annually to the advancement and protection of its requirements. We support this through training to ensure each employee's actions are in line with our company's commitment on business conduct.

A key measure of our success is ensuring the safety of all employees and workers. We are committed to conducting our business activities in a manner that protects the health and safety of our people, regardless of gender.



Griffith Foods' sustainability strategy has goals and measures that ensure the day to day operations of our business are executed in line with the protection of all those working in our facilities. We extend this safety to protecting employees' and workers' personal data and have global requirements for the lawful and proper handling of data.

To ensure a safe and inclusive workplace, where all employees are valued, included, and able to grow, Griffith implements policies that prohibit discrimination and harassment on the basis of race, color, sex, gender, national or social origin, religion, age, disability, sexual orientation, marital status, or pregnancy status. Griffith Foods prohibits all forms of violence and harassment in the workplace, including verbal, physical, sexual, or psychological abuse. All employees and workers are protected from retaliation for reporting harassment. These policies are clearly communicated regularly to all workers in our Code of Ethics and Business Conduct.

We practice equitable and non-discriminatory hiring practices, offer fair and competitive compensation to all employees, and respect industry standards and local laws on minimum wages and working hours. Griffith Foods provides all employees and workers, regardless of gender, equal opportunities in all aspects of training, as well as personal and professional development opportunities.

We respect the freedom of association and employees' and workers' right to choose to form or voluntarily join trade unions and collectively bargain. Griffith Foods' policy forbids retaliation against any employee or worker, regardless of gender, on the basis of trade union membership status.

Our Code of Ethics and Business Conduct outlines our position against human trafficking, forced labor and child labor. In particular:

- Griffith Foods will only employ persons whose presence is voluntary and the Company will not use bonded forced, compulsory labor, servitude or prison labor. Griffith Foods will comply with all applicable laws prohibiting slavery and human trafficking.
- Griffith Foods shall not use any form of corporal punishment or mental or physical coercion as a form of discipline of its employees or workers.
- Griffith Foods will not use child labor in conducting its business. The term "child" refers to a person younger than the age of compulsory education or as established by applicable law but in no case shall any child younger than fifteen (15) years of age be employed by the Company or work in the Company's operations.

Migrant or temporary foreign workers are accorded treatment and protection equal to other workers. Where we use agency workers, Griffith Foods has a policy of paying all recruitment fees.

## b. Our Suppliers, Partners and Communities

Our commitment to the protection of human rights extends to our supply chains and requires the organizations from whom we source to protect and respect people and human rights, promote good agricultural practices, provide viable livelihoods, manage and reduce environmental impacts, treat



animals humanely and produce safe, high quality ingredients and products. As engaged members of initiatives such as the Sustainable Agriculture Initiative (SAI Platform) and Sustainable Spices Initiative (SSI), we are working collaboratively with our peers and partners to ensure that our principles on human rights are extended thoughtfully throughout our farming communities.

Griffith Foods' Supplier Code of Conduct and Global Purchasing Agreements underscore our commitment to the UN Guiding Principles and clearly articulate our expectations for our suppliers including requirements to:

- Provide safe and healthy working conditions at all operations for all employees and workers, regardless of gender.
- Never tolerate human trafficking, forced labor or child labor, as defined by the ILO.
- Foster an inclusive work environment free of harassment and discrimination on the basis of race, color, sex, national or social origin, religion, age, disability, sexual orientation, marital status, pregnancy status, gender identity, union membership, or any other status protected by applicable law.
- Ensure that employees and workers, regardless of gender, are fairly compensated and meet or exceed all legal requirements for compensation and working conditions.
- Respect the right to freedom of association and collective bargaining.
- Establish the means for confidential reporting of violations by employees, workers and external partners.

As a condition of doing business with Griffith Foods, we require suppliers and partners to acknowledge their commitment to the Supplier Code in writing. We also expect suppliers to hold their own supply chains, including third-party labor agencies, to the same requirements.

We seek partnership across the industry, with governments and nongovernmental organizations to advance and ensure adherence to these principles.

We are mindful of communities local to our operations and value chain, and particularly of those most vulnerable to human rights risks, such as migrant workers, women and children. We commit to engagement with the smallholder communities from whom we directly source, and aim to use our influence with suppliers to address risks in our broader value chain, including those linked to water use.

We respect the resources and tenure rights of indigenous people and communities. We observe the principle of free, prior and informed consent and support the FAO Voluntary Guidelines on Responsible Tenure of Land, Fisheries and Forest, which help ensure that land tenure rights of local people are protected.

We do not tolerate threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest in our operations or value chain.



## 3. Compliance – Monitoring and Remediation

We conduct due diligence in our business and value chain to identify human rights risks and prioritize actions to mitigate them.

- We use an internationally recognized third party platform to monitor suppliers' sustainability performance and compliance with our Supplier Code. We reserve the right to take further steps to ensure suppliers' compliance, including third-party auditing of suppliers, and to suspend/terminate non-compliant suppliers.
- In accordance with the UN Guiding Principles, we commit to establish or support appropriate and effective mechanisms for prevention and remediation of adverse human rights impacts linked to our business activities. We take all reports of potential misconduct seriously and handle them promptly, fairly, and as confidentially as possible.
- We have established a transparent and reliable process for investigating and remediating grievances. Any grievance or report from employees and external parties may be submitted anonymously online or by phone call to the ethics hotline, which is operated by an independent third-party and available 24 hours a day, seven days a week. Employees can also raise issues with their manager, human resources representative, and/or through their employee representative. Griffith Foods and its management will not tolerate retaliation against anyone who, in good faith, raises concern or participates in an investigation.

## 4. Scope and Governance

This policy applies to Griffith Foods Worldwide Inc. and the entities in which we hold a majority interest.

It is overseen by our Board of Directors, including our Chair and CEO, who are informed at least annually of our human rights progress and performance. Our SVP Global HR, VP Global Purchasing and VP Sustainability are responsible for ensuring the application and continued oversight of the policy across our business and value chain. The policy will be reviewed at least once every three years to ensure that its requirements remain relevant and implementation remains effective.