

THL Gourmet Foods

Supplier Code of Conduct

Effective Date: December 2024

“We partner with our suppliers to deliver on our purpose of helping Canadians Live Life Well.”

Our Purpose – Live Life Well

We exist to help Canadians “Live Life Well”. Delivering on this purpose requires that we build trust by conducting our business ethically, honestly and with the utmost integrity. That is why “Sourcing with Integrity” is a key component of how we do business. To preserve the trust our stakeholders have in us, we count on our network of Suppliers (defined below) to commit to and uphold our standards of integrity, values and operating principles.

We also recognize our responsibility to respect and protect the human rights of our customers*, colleagues and employees who work in our network of stores, offices, and facilities nationwide, as well as the many workers, including migrant and temporary workers, employed within our wider supply chain network. We expect our Suppliers to also uphold human rights within their operations. This Supplier Code of Conduct (the “Code”) provides standards on protecting human rights, adhering to applicable employment and/or labour standards and providing safe working conditions for workers.

** Customers refers to either: Consumers who purchase products and/or services from THL Gourmet Foods or its affiliates or subsidiaries for consumption, or; Corporate entities, which source products from THL Gourmet Foods, such as retailers or distributors for resale to consumers.*

Application and Acceptance

This Code applies to all suppliers, vendors and manufacturers who manufacture, package, and/or supply goods and/or services (collectively, “Suppliers”) to THL Gourmet Foods Inc., its affiliates, subsidiaries, operating divisions, and/or customers (collectively, “THL Gourmet Foods” or the “Company”). Suppliers must share this Code with their workers and their agents, brokers, contractors, subcontractors, sub-agents, and other third parties, including any labour agencies engaged to assist with providing goods or performing services for THL Gourmet Foods (collectively, the “Related Parties”). Any reference to “workers” within this Code means both the Supplier’s workers and Related Parties’ workers.

By accepting to do business with the Company (including entering into any standard terms and conditions or other contractual agreements with the Company (the “Governing Terms”)), you accept the terms of this Code and affirm compliance with its requirements. The Code may be amended from time

to time, and you will be provided with reasonable notice of material changes. This Code is not to be read in lieu of but in addition to your obligations as set out in the Governing Terms.

Expectations

This Code outlines the expectations and guidelines of THL Gourmet Foods regarding responsible sourcing, including our commitment to human rights, the environment, health and safety, regulatory compliance, business ethics and the development of a diverse and sustainable supply chain. We expect our Suppliers to uphold the commitments set forth in this Code and to communicate this Code, including details of THL Gourmet Foods Integrity Action Line (the “IAL”) to their workers and Related Parties. Our relationship with Suppliers and the foundation of this Code are built on promoting trust, fair dealing, and collaboration throughout the grocery value chain.

This Code sets out minimum standards that Suppliers must meet. Nothing in this Code shall prevent Suppliers from exceeding these standards. Suppliers are expected to comply with the Governing Terms, and applicable laws and regulations (including without limitation, international human rights standards such as the United Nations Convention for the Elimination of All Forms of Discrimination Against Women, and the International Labour Organization’s Fundamental Principles and Rights at Work). Where such requirements conflict, Suppliers are expected to comply with the highest applicable standard.

THL Gourmet Foods acknowledges that some Code infringements that are identified may take time to resolve. If appropriate and feasible under the circumstances, we will work with Suppliers to accommodate reasonable timeframes that allow Suppliers to make improvements in their operations to correct such infringements. We seek to maintain relationships with Suppliers that demonstrate their commitment to the Code by, among other things, promptly responding to and resolving our concerns. However, violations of this Code may sometimes warrant an immediate resolution, failing which termination of our relationship may be required. For serious violations of the Code, as determined by THL Gourmet Foods supply chain compliance audit program, THL Gourmet Foods reserves the right to suspend or terminate the relationship before providing a Supplier with an opportunity for resolution.

Monitoring Compliance

Suppliers shall monitor compliance with the terms of this Code and Governing Terms throughout their own operations as well as Related Parties’ operations. Suppliers are obligated to immediately disclose any known or suspected violations of the Code to the IAL or THL Gourmet Foods representatives noted in the “Speak Up” section.

While adherence to the requirements in this Code are the responsibility of the Supplier, THL Gourmet Foods may verify Supplier compliance with the Code through a variety of tools, including but not limited to:

- Suppliers’ self-evaluations;
- Ongoing improvement programs; and
- Audits by the Company or a representative designated by the Company.

THL Gourmet Foods expects cooperation and transparency during the compliance monitoring process. Specifically, we expect Suppliers to encourage and facilitate any communication with workers required for audits and not to take any action to intimidate, influence, or retaliate against workers who take part in this process. THL Gourmet Foods personnel or a representative designated by the Company may regularly visit facilities, to monitor compliance and progress with improvement programs. Should a Supplier fail to comply with our compliance monitoring, we may exercise our right to notify local authorities, embassies, retail associations, and other parties as we deem necessary to report the failure to comply as grounds of suspicious conduct on the part of the Supplier.

In addition to the remedies set out above, should a Supplier fail to comply with the Code, THL Gourmet Foods reserves the right to require corrective action. If a Supplier fails to implement corrective action or fails to comply with the Code, THL Gourmet Foods may, in its sole discretion and without any further obligation to Suppliers, suspend or terminate, in whole or in part, its relationship with the Supplier.

Review

This Code is reviewed annually or earlier as determined by THL Gourmet Foods Inc.

Speak up if you have a concern

It is important that non-compliant and unethical matters are reported. We encourage anyone who knows of or suspects suspicious activity, unethical practices, non-compliance with laws and regulations, Governing Terms, this Code, or Company standards, policies, procedures and other initiatives shared with Suppliers (collectively, “Policies”), in effect and as may be amended from time to time, to speak up by reporting any violations or potential violations through the following channels:

- Your THL Gourmet Foods Contact:
 - Goods for Resale Suppliers – THL Gourmet Foods Purchasing Department
 - Goods not for Resale Suppliers – THL Gourmet Foods representative
- Legal & Compliance Department at: legalnotice@thlfoods.com
- The Integrity Action Line:
 - Call 1-800-525-7868 (available in English, French, Mandarin, Cantonese, Punjabi, Spanish and Korean).
 - Visit www.integrityactionline.com (Open in a new tab) (available in English, French and Spanish).
 - Check out <https://thlfoods.com/compliance/> to learn more.

We take it seriously

The Company values Suppliers and workers who speak up, as this fosters a culture of transparency and trust – and it’s the right thing to do. Our Enterprise Compliance & Ethics team administers the IAL process, objectively oversees resolution of incidents and assesses adverse impacts to our operations and supply chain. Reports are assigned to impartial investigators who conduct a confidential investigation.

Details matter

It is important that reports contain as much information as possible regarding the non-compliant or unethical conduct or activity to assist with the investigation process. If you report through the IAL, you will receive a Report ID to access your report. Write down and protect your confidential Report ID so you can check the status of your report and securely communicate with the investigator to provide additional information, as required.

We respect confidentiality and protection against retaliation

We are committed to fair and appropriate treatment and respect confidentiality of all parties involved. Reports to the IAL maybe made anonymously. The privacy of the reporter will be respected and confidential information will be shared only on a “need to know” basis or if required by law. THL Gourmet Foods prohibits retaliation or reprisal against Suppliers and their workers who speak up in good faith.

Who to contact

Reach out to your THL Gourmet Foods representative, Legal & Compliance Department (legalnotice@thlfoods.com), should you have any questions about this Code.

Principles of Business Conduct

We strive to build a win-win model with our Suppliers. Business relationships are more constructive when they are built on trust, mutual respect, and common business and ethical values. Suppliers who act illegally or unethically can expose our Company and our colleagues to legal action and could significantly damage THL Gourmet Foods's reputation and brand. We value Suppliers who share a commitment to the following principles. An inherent respect for and protection of human rights underlies most of these principles and should always be at the core of a Supplier's operations.

1. **Compliance with Applicable Laws, Policies, and Governing Terms** Comply with applicable laws and regulations, Company policies and Governing Terms.
2. **Ethical Conduct and Behaviour** Align your actions, decisions and behaviours with ethical business practices.
3. **Employment Standards** Treat people with dignity and respect by adhering to applicable human rights and employment standards.
4. **Health and Safety** Protect the health and safety of your workers by complying with applicable health and safety laws.
5. **Quality** Comply with quality standards regarding manufacturing, delivering and the supply of products and services.
6. **Environmental Responsibility and Animal Welfare** Remain committed to reducing the negative impact of your operations on the environment and ensuring the ethical treatment of animals.

Compliance with Applicable Laws, Policies, and Governing Terms

“Comply with laws and regulations that apply to you in the regions in which you operate, as well as applicable Company Policies and Governing Terms.”

Understand the laws and regulations applicable to your location and operation as well as applicable THL Gourmet Foods Policies, and Governing Terms. Diligently comply with them. Ensure that products are not produced – in whole or in part – in violation of the law or in a way that could cause THL Gourmet Foods to violate the law.

If the applicable laws and regulations differ from this Code, applicable THL Gourmet Foods Policies or Governing Terms, Suppliers should adopt the more stringent requirements.

Competition Laws: THL Gourmet Foods maintains a competition law compliance program (the **“Compliance Program”**) that includes guidance and standards for Suppliers to minimize the risk of non-compliance with competition and anti-trust laws, for both Canada and the US, as applicable. THL Gourmet Foods requires that you comply with requirements of the Compliance Program. It is ultimately the responsibility of Suppliers to comply with applicable competition and anti-trust laws and regulations.

Confidentiality: Comply with confidentiality requirements in THL Gourmet Foods Policies and Governing Terms.

Cyber Security: Ensure you have sound security practices to protect THL Gourmet Foods, its colleagues, and its customers if you provide technology, digital, online, or support services and/or have access to sensitive information or operate mission critical systems. Adhere to the relevant information security terms in THL Gourmet Foods Policies and Governing Terms.

Privacy Laws: THL Gourmet Foods takes the responsible use and protection of personal information very seriously and requires that you comply with the applicable Canadian and/or US federal and provincial/state privacy legislation that applies to your operations, in addition to, adhering to the THL Gourmet Foods Supplier Privacy Policy.

Trade and Sanctions: Comply with all applicable trade regulations and sanctions.

Resources available Goods for Resale Suppliers: Located on supplier portal or vendor manual/vendor board. Goods not for Resale Suppliers: Available upon onboarding and by request to your THL Gourmet Foods representative.

2. Ethical Conduct and Behaviour

“Align your actions, decisions and behaviours with ethical business practices.”

We expect our Suppliers to uphold a commitment to integrity and trust. This means Suppliers must make good and ethical business decisions.

Anti-Bribery, Anti-Corruption and Anti-Money Laundering:

- Comply with all applicable anti-bribery, anti-corruption, and anti-money laundering laws and regulations in the jurisdictions in which you operate.
- Adopt a zero-tolerance approach to bribery, corruption, and money laundering.
- Do not offer, pay, receive, or solicit bribes, kickbacks, payments, favours, or gifts of any kind, either directly or indirectly, to obtain a favourable outcome.
- Do not make facilitation or “grease” payments to public officials, regardless of the amount.
- Upon commencement of your relationship with THL Gourmet Foods, disclose your ownership structure (specifically, ownership by a government or public official) to your THL Gourmet Foods representative. Disclose any changes to your ownership structure promptly.

Fraud:

- Do not engage in any fraudulent activity including but not limited to theft, deception, forgery, misrepresentation, misuse of information or concealment of facts.

Conflict of Interest:

- A conflict of interest arises when your private and/or personal interests influence, appear to influence, or could potentially influence your ability to comply with your contractual obligations in an objective, compliant, and impartial manner. For example, a conflict of interest could arise if a worker has a close personal or family relationship with a THL Gourmet Foods colleague involved in the contractual relationship.
- Develop policies and practices to prevent workers’ personal interests from influencing or appearing to influence your ability to conduct business with THL Gourmet Foods.
- Before conducting business with THL Gourmet Foods, disclose any actual, perceived, or potential conflict of interest to your THL Gourmet Foods representative.
- Do not enter any transactions with THL Gourmet Foods that create an actual or perceived conflict of interest.

Gifts & Entertainment

- Do not give or accept gifts or entertainment that could be perceived to be an attempt to influence a business decision, create an obligation to do something in return, or a personal reward for making a business decision.
- Adhere to the following principles in deciding whether to give or accept a gift or entertainment. Gifts or entertainment given or received should:

- Be of nominal value and not extravagant.
- Be infrequent.
- Be related to a reasonable business purpose and primarily benefit THL Gourmet Foods.
- Be consistent with acceptable business practices, given the industry and the geographic location.
- Be permitted by law, THL Gourmet Foods Policies and the policies of your company.
- Not reflect or have the potential to reflect poorly on—or embarrass— THL Gourmet Foods.
- Not be indecent, pornographic or otherwise seen as offensive.
- Not be provided if a tendering process is ongoing involving your company.
- Maintain records of all gifts, entertainment, or hospitality provided to THL Gourmet Foods.

3. Employment Standards

“Treat people with dignity and respect by adhering to applicable human rights and employment standards.”

THL Gourmet Foods respects the human rights of our colleagues, customers, supply chain partners, and community members. We are committed to preventing and reducing any risk of forced and child labour in our global supply chain. We expect our Suppliers to do the same, demonstrating a commitment to treating people, including workers, with dignity and upholding their human rights. We ask that you pay particular attention and adhere to these standards for workers vulnerable to workplace abuse and discrimination, including migrant workers, women, gender-diverse people and young people. The Code sets out minimum employment and labour standards imposed by THL Gourmet Foods. However, you must understand your obligations under applicable laws and regulations and comply with the more stringent standards applicable to your operations.

No Violence, Harassment & Discrimination

- Do not subject workers to any form of verbal, physical or sexual abuse, harassment, or intimidation, including but not limited to degrading treatment, violence, exploitative conduct, assault, or threats thereof in the workplace or at work-related events and engagements.
- Do not engage in discriminatory practices against workers at any point in the employment relationship, including during hiring. Discrimination is prohibited on the basis of race, colour, gender, caste, social background, sexual orientation, ethnicity, national origin, disability, pregnancy, religion, political affiliation, union membership, marital status, medical condition, or any other personal characteristic protected from discrimination by applicable laws or regulations.
- Do not use medical tests to inform hiring or employment decisions unless required by applicable laws or regulations, to make accommodation decisions, or to determine if a worker is able to perform the duties of the position safely. Never administer, require or consider pregnancy or HIV tests in hiring or employment decisions.
- Ensure workers are aware of disciplinary measures and processes for non-compliance. Disciplinary measures must not include physical or verbal abuse, corporal punishment, deduction or withholding of wages earned, or any practice proscribed by this section.
- Ensure workers are protected from retaliation and harassment/abuse for reporting actual or perceived breaches of their rights outlined here or pursuant to applicable laws.

Comply with Employment and Labour Laws

- Only employ workers that have a legal right to work in the country of employment.
- Verify that workers are of minimum legal age to work prior to employment (see No Forced or Child Labour section for additional details). Suppliers are strictly prohibited from retaining workers' original documents, including identification cards and passports.
- Ensure that terms and conditions of your worker's employment are in a language they understand and comply with any existing employment contract. Written contracts must be

freely signed, and workers must have access to them. Be transparent with workers about the details of their employment, including working conditions, legal rights, nature of work, wages, benefits, deductions from wages, regular working hours, overtime requirements, time-off and duration of the contract.

- Do not enter into employment arrangements intended to circumvent your obligations as an employer under applicable employment and labour laws and regulations.
- Ensure all labour agencies engaged comply with the Code. Using labour agencies does not relieve you of your obligations under this Code.
- Keep employment records of your workers accessible at all times.
- Workers must be permitted to terminate their employment at any time without penalty, including financial penalty, like forced repayment of earned wages or travel expenses (for migrant workers).
- If a contract with a migrant worker is terminated, requiring their return to their home country, Suppliers are responsible for paying for passage, unless suitable arrangements have been made.

No Forced or Child Labour

- Do not engage in involuntary labour practices in your operations and supply chains. This includes forced, bonded, trafficked, involuntary prison, or underage labour. Monitor for any signs of involuntary labour practices, paying close attention to vulnerable workers, including migrant workers, women, and young people. All workers must enter into employment voluntarily and may terminate employment at any time.
- Under no circumstances should workers be allowed or required to pay any recruitment fees in relation to their employment or position to any party, whether directly to the Supplier or indirectly via licensed or unlicensed agencies. Suppliers must ensure that any labour agencies they use, particularly for migrant worker recruitment, do not engage in these prohibited practices.
- Do not employ workers under 16 years of age, below the age of compulsory education or under the minimum age as defined by local law, whichever is highest. The family farm exception is applicable; employing a minor aged 12- 15 working on a family farm owned or operated by their parent or guardian is permissible.
- Ensure that workers aged 12 - 18 have working hours, conditions and other benefits appropriate to their age. These conditions must not jeopardize their physical, emotional, or mental health or safety, pose a risk to their physical and emotional development, or compromise their education. Suppliers with young workers must track their duties and positions to ensure compliance with young worker requirements.
- Do not unreasonably restrict worker's freedom of movement in the workplace. Do not require them to remain in the workplace beyond their scheduled hours, prevent them from taking required breaks or using the bathroom, or illegally confine them at any time, including after work. In supplier- provided/managed dormitory facilities, workers must be free to enter and leave without restriction.

Comply with laws and agreements regarding compensation and working hours

- Working hours shall comply with applicable laws, industry and/or international standards, whichever gives the greatest worker protection. Working hours may only exceed this standard if all the following conditions are met:
 - Permitted by applicable laws;
 - The employer can demonstrate that exceptional circumstances apply, such as seasonal work, accidents or emergencies;
 - Permitted by a collective bargaining agreement with a worker's organization, if applicable; and
 - Health and safety standards of workers are maintained.
- Any exceptions for agricultural purposes (i.e., harvest seasons) must be pre-planned, explained to workers in advance, and reflected in their contracts, where written contracts exist. Workers must be compensated at a higher rate and/or time compensation for such work.
- All quota, piecemeal, or production-based pay must align with hourly expectations i.e., at a pace that ensures the health and safety of the worker.
- Except in exceptional circumstances prescribed by local laws, all overtime must be voluntary, and workers cannot be penalized for refusing. Overtime must be paid at a premium where required by local laws and regulations.
- Provide workers with, on average, at least 24 hours of rest for every 7-day period. Time off must be calculated consistently across all positions.
- Pay workers regularly, on time and at least the legal minimum wage or industry benchmark standards in the applicable jurisdiction. We encourage Suppliers to commit to improving wage and benefit levels to address the basic needs of workers and their families.
- Ensure sufficient cash flow and reserves to cover wages for work already performed. In cases of site closure, layoffs, or other business-related disruptions, Suppliers must pay workers all wages for completed work, at a minimum.
- Ensure workers are paid all wages owed to them, only legally permissible amounts may be deducted from worker's wages. Suppliers must provide all benefits as required by applicable laws and regulations.
- Pay wages directly to the worker. Use bank account information provided by the worker solely for depositing their pay. Suppliers must be transparent about how wages and benefits, if any, are calculated, and explain any legal deductions made for each pay period.

Respect Freedom of Association

- Respect all workers' rights to freedom of association and collective bargaining, including their right to form workers committees in countries where freedom of association is restricted.
- Allow these worker activities to take place in the workplace, in accordance with any collective agreement and applicable laws and regulations.
- Workers must have the opportunity to freely communicate and engage with management to discuss working conditions without fear of unjust treatment, regardless of union affiliation.
- Worker representatives or trade union members must not face discrimination or penalties due to their membership or affiliation with a trade union or worker organization.

Complaints Procedure

- Provide a mechanism for all workers, unionized or not, to report any workplace complaints or concerns. This complaints procedure must be accessible to all workers. Maintain the confidentiality of all reports, releasing information only as necessary for investigation and resolution.
- Workers who file reports in good faith must be protected from retaliation.
- Share THL Gourmet Foods's Integrity Action Line and this Code with your Related Parties and workers. Immediately report all known violations of this Code or THL Gourmet Foods Policies to your THL Gourmet Foods representative.

Subcontracting

- Those Suppliers that support THL Gourmet Foods control brand products, i.e., those products sold under THL Gourmet Foods private label, must disclose all subcontractors used and receive THL Gourmet Foods's approval before authorizing production. All other Suppliers must maintain accurate information for all subcontractors, including but not limited to names, owners, addresses, and production details and provide such information to THL Gourmet Foods upon request.

4. Health and Safety

“Protect the health and safety of your workers by complying with applicable health and safety laws.”

We require your commitment to providing and maintaining a safe and healthy work environment.

- Provide workers with a safe and hygienic working environment.
- Ensure that buildings and facilities do not pose hazards to workers and have the appropriate structural integrity. This includes, but is not limited to, all workplace related facilities:
 - Dormitory facilities - must be clean, safe, and reasonable to support occupants' health and wellbeing,
 - Food preparation and eating facilities – must be maintained and sanitary.
- Provide sufficient potable drinking water at all times.
- Workers must have access to safe and sanitary bathroom facilities in their workplaces.
- Implement safety and emergency prevention programs at all workplace facilities to prevent accidents or injury. These programs must include:
 - Regular training for workers;
 - Functional fire alarms, fire extinguishers, sprinklers, smoke detectors and relevant firefighting and prevention equipment at all facilities; and
 - Clear routes of egress for workers, ensuring emergency evacuation is always possible.
- Provide workers with all necessary personal protective equipment to perform their duties safely and ensure equipment is always in good working condition while in use. Do not deduct the cost of uniforms and required safety equipment from workers' wages.
- Ensure chemicals, including pesticides, are properly stored, labeled, and managed.
- Implement a process for reporting, managing and promptly resolving health and safety issues.
- Workers have the right to refuse work that poses an imminent, serious danger to their safety.

5. Quality

“Comply with quality standards regarding manufacturing, delivering and the supply of products and or services.”

Provide safe, high-quality products and services to protect public health. Manufactured and/or delivered products and services must meet or exceed food, drug or product safety and quality standards required by applicable Canadian and US laws and regulations and THL Gourmet Foods Policies, including those provided to you and as may be amended from time to time.

6. Environmental Responsibility and Animal Welfare

“Remain committed to reducing the negative impact of your operations on the environment and the ethical treatment of animals.”

No matter where you live on this planet, climate change is one of the most pressing and persistent challenges we face collectively. THL Gourmet Foods is committed to fighting climate change and reducing our environmental impact. We are doing this by setting clear environmental goals to achieve a net-zero carbon footprint for our enterprise operations by 2040, to eliminate food waste sent to landfill, and to use better plastic packaging and less of it. We are committed to fostering sustainable practices and complying with applicable environmental laws and regulations.

Partnering with our Supplier Community to achieve THL Gourmet Foods’s Environmental Commitments

THL Gourmet Foods is committed to reducing plastic waste and achieving net-zero emissions. We championed the Golden Design Rules for packaging (a set of internationally accepted rules to improve plastic recyclability and reduce plastic waste), aiming to make 100% of our control brand and in-store plastic packaging aligned to the Golden Design Rules for recyclability by 2025. We ask our suppliers to support these rules and consult our packaging guidance document on the THL Gourmet Foods Supplier Portal. Additionally, we are working towards a net-zero carbon footprint for our enterprise operations by 2040 and aim to achieve net-zero across our entire footprint, including Scope 3 emissions from our supply chain, by 2050.

Our Environmental, Social, and Governance (ESG) initiatives continue to evolve, and our standards will adjust to reflect. THL Gourmet Foods will provide reasonable notice of any amendments to our supplier standards related to ESG commitments.

Environmental Laws Regulations and Animal Welfare

We expect our Suppliers to comply with applicable environmental laws and regulations and adhere to the following:

- Understand and conduct business operations in accordance with all applicable environmental laws and regulations, standards, administrative practices and policies. This includes, emissions released into the atmosphere and water bodies, solid waste disposal and the handling and disposal of hazardous materials.
- Immediately notify appropriate authorities of any improper discharge of hazardous or polluting materials. Take action to correct the issue and remediate the environmental impact.
- Treat animals in accordance with government and industry-accepted guidelines for ethical treatment.

For more information about THL Gourmet Foods’s position on the environment and the ethical treatment of animals, visit the Responsibility page on <https://thlfoods.com/compliance/>.