



Supplier Code of Conduct

Nothing in this Policy is intended to create a contract between Lifecore Biomedical, LLC (“Lifecore” or “the company”) and any employee. The Company reserves the right to change all matters contained in these policies at any time and without prior notice. The Company reserves the right to interpret the provisions of the Supplier Code of Conduct, and to vary from it when such variance is appropriate. It is the employee’s responsibility to remain current on policy revisions/updates or new policies. Notification will be sent out to all employees when changes occur to these documents. The most recent version of each policy supersedes and replaces any prior version. For additional interpretation of this policy, consult with a member of the Human Resources Department.

At Lifecore Biomedical, LLC, our mission is to work with our partners to provide high quality innovative product development and manufacturing solutions guided by our unwavering commitment to improving people’s lives.

Lifecore Biomedical LLC and our customers expect similar behavior from all parties that we deal with, especially Lifecore suppliers. This Supplier Code of Conduct (the “Code”) specifies and helps the continued implementation of our corporate business principles by establishing certain non-negotiable minimum standards that we ask our suppliers, their employees, agents and subcontractors (the “Supplier”), to respect and to adhere to at all times when conducting business. It is the Supplier’s responsibility to educate its employees, agents and subcontractors accordingly.

This code intends to conform to standards established by the International Labor Organization (ILO), and the Supplier accepts that all existing and future agreements and business relationships with Lifecore Biomedical, LLC will be subject to the provisions contained herein.

Business Integrity

Compliance with applicable laws and regulations

The Supplier must comply with all applicable laws and regulations and shall notify us immediately in writing if it discovers any violation or condition which may cause the imminent violation of applicable laws and regulations.

Improper Advantage

In all its activities, the Supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in an effort to obtain or retain a business or other advantage from a Third Party, whether public or private. The Supplier also must not accept any such advantage in return for any preferential treatment of a Third Party.

Traceability

At Lifecore Biomedical LLC, our objective is to ensure traceability in our raw material supply chains, sufficient to ensure that we achieve traceability of raw material origins. It is expected that Lifecore suppliers have evidence of traceability in all tier 1 and tier 2 suppliers within their respective supply chains.



Commitment to Anti-Corruption Compliance

At Lifecore Biomedical, LLC, we conduct our business consistent with high ethical standards and in full compliance with applicable anti-corruption laws including the U.S. Foreign Corrupt Practices Act and all federal, state, and local anti-corruption and ethics laws in every country in which we do business. We believe that a strong stance against bribery and corruption supports our core values and enables us to achieve our business objectives. We have zero-tolerance for bribery and corruption and are committed to acting ethically, professionally, fairly, and with integrity in all business dealings and relationships. This policy applies with equal force to all persons working with, for or on behalf of us in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners, such as distributors, material manufacturers, customs brokers and other suppliers.

Sustainability

Lifecore Biomedical, LLC supports and encourages all suppliers to maintain environmentally conscience operating practices and production systems that are sustainable. This is an integral part of the Lifecore Biomedical, LLCs' supply strategy and supplier development. Lifecore Biomedical, LLC encourages its Suppliers to continuously strive towards improving the efficiency and sustainability of its operations, through the implementation of such measures as water conservation programs and best-practice controls on chemical use, waste reduction, recycling and overall impact on the environment.

The Supplier shall strive to minimize the environmental impact of their activities through responsible management, widespread environmental awareness and the use of technologies with low environmental impact and ensure compliance with all applicable laws and regulations in the country where products or services for Lifecore Biomedical, LLC are manufactured or delivered.

Labor Standard

Voluntary Employment and forced labor

The Supplier must under no circumstances use or in any other way benefit from forced or compulsory labor. Likewise, the use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence, or other forms of harassment or abuse as a method of discipline or control. The Supplier shall not under any circumstances utilize factories or production facilities that force work to be performed by unpaid or indentured laborers, nor shall the Supplier contract for the manufacture of products with subcontractors that engage in such practices or utilize such facilities. Where the Supplier is using laborers who are in an official prison rehabilitation scheme, such an arrangement is not considered a breach of this Code.

Transparency in Supply Chain

The Supplier shall not engage in, or purchase any goods from any party engaged in slavery and human trafficking, shall certify that materials incorporated into their products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business, and shall take reasonable measures to verify their compliance.



Child labor

The use of child labor by the Supplier is strictly prohibited. The Supplier represents that it does not and shall not employ individuals below the age of 16, except if (a) expressly permitted by local law, and (b) such exception is consistent with ILO guidelines concerning the use of child labor. The Supplier shall maintain documentation of the date of birth of each person who works for it or have legitimate means of confirming that each such person may permissibly be employed under this Code and all applicable laws.

Migrant Labor

The Supplier recognizes the unique legal, social, economic, and cultural situations that migrant workers face and will ensure that such workers are treated with dignity, respect and in accordance with the same standards as apply to other workers.

Working hours

The Supplier must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked. In the event of conflict between a statute and mandatory industry standard, the Supplier must comply with the one taking precedence under national law.

Compensation

The Supplier's employees must be provided with wages and benefits that comply with applicable laws and binding collective bargaining agreements, including those pertaining to overtime work and other premium pay arrangements. All wages and wages shall be paid in accordance with such standards set by applicable law, and shall be sufficient to enable the typical worker in the locality to purchase basic life necessities.

Non-Discrimination, Diversity, and Inclusion

The Supplier shall implement a policy that conforms to the applicable law prohibiting discrimination in hiring and employment practices on the grounds of race, colour, religion, sex, age, physical ability, national origin, or any other protected status.

Freedom of Association and Right to Collective Bargaining

The Supplier must at all times recognize and respect the right of employees' freedom of association and their right to form and join trade unions and bargain collectively in a lawful and peaceful manner, subject to and in accordance with applicable law.

Safety and Health

Workplace Environment

The Supplier shall comply with all occupational and industrial safety standards established by law applicable to the locations in which it employs workers, and shall provide employees with safe and healthy working and, if applicable, housing conditions. At minimum, the Supplier must provide to employees potable drinking water, adequate sanitation, fire exits and essential safety equipment, and appropriately lit and equipped work stations. In addition, the Supplier's facilities must be constructed and maintained in accordance with the standards set by applicable law. Vendors in our supply chain offering housing to employees shall ensure that such housing meets adequate hygiene and cleanliness standards, affords sufficient space per occupant, and offers an appropriate level of privacy.



Product quality and safety

All products and services delivered by the Supplier must meet the quality and safety standards required by applicable law. When conducting business with or on behalf of Lifecore Biomedical, LLC, the Supplier must comply with the Lifecore Biomedical LLC, quality requirements outlined in the Lifecore Biomedical, LLC Quality Agreements in place between the parties.

Audit and Termination of the Supply Agreement

Lifecore Biomedical, LLC reserves the right to request assurances and/or take additional measure to verify the Supplier's compliance with this Code.

In the event Lifecore Biomedical, LLC becomes aware of any actions or conditions that fail to comply with this Code, Lifecore Biomedical, LLC reserves the right to demand corrective measures and to terminate any agreement with the Supplier.

Status CURRENT