

LEPRINO FOODS COMPANY SUPPLIER CODE OF ETHICS

At Leprino Foods, **ethical and responsible conduct** is a key driver of our success. Our company strives to promote a mutually beneficial business relationship with our suppliers that is based on the highest standards of ethical conduct.

We have developed this Supplier Code of Conduct (“Supplier Code”) to clarify our expectations and provide guidance to our suppliers, vendors, contractors, consultants, agents and other providers of goods and services (“Suppliers”). Suppliers are, without exception, expected adhere to this Supplier Code.

Of our four Core Values: Quality, Service, Competitive Price and Ethics, ethics is the foundation:

“We strive to do the right thing all the time. We are principled and fair in all our dealings. We take personal responsibility to do our very best. Promises made are promises kept.”

We expect that our Suppliers will hold themselves to this high standard in their dealings with Leprino Foods and their own employees, customers, vendors, communities, shareholders and other stakeholders.

While the foregoing brief statement captures the essence of our expectations for ethical and legal behavior, this Supplier Code provides more specificity to ensure our suppliers fully understand the broad scope of this Core Value and how it applies to them. We expect our all our suppliers to comply with the following:

1) **LEGAL COMPLIANCE IS A MUST; ETHICAL BEHAVIOR PARAMOUT**

We expect our suppliers to conduct their business in full compliance with all applicable federal, state and local laws, statutes, ordinances, rules, and regulations, whether in the United States or in any other jurisdiction in which they do business. Leprino Foods has the right to decline future business relations or terminate existing business relationships with suppliers who fail to properly conduct their business in accordance with all applicable laws.

Simple legal compliance is not enough, we expect our suppliers to conduct themselves fairly and honestly, to hold themselves to the highest ethical standards, and with a clear commitment to doing the right thing, not just the legal or expedient thing.

2) **RESPECT FOR HUMAN RIGHTS, DIVERSITY AND FAIR LABOR PRACTICES**

We expect our suppliers to treat their employees with the fairness, dignity and respect that all individuals deserve; equal treatment of all employees should be a cornerstone of a Supplier’s employment policies. Further, we expect our suppliers (and in turn their suppliers) to have programs, policies and practices that:

- Ensure compliance with all applicable employment, discrimination, labor and wage and hour laws;
- Properly verify the employment eligibility of their employees;
- Respect the right of all employees to freely associate and collective bargaining;
- Encourage a diverse workforce;

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- Prohibit discrimination, harassment and abuse of any kind including but not limited to discrimination, harassment or abuse based on race, sex, ethnicity, religion, creed, nationality, age, and sexual orientation or identity;
- Ensure that employment decisions are based on legally justifiable grounds such as qualifications, skills, performance, and experience;
- Prohibit the use of any form of indentured, forced or compulsory labor;
- Prohibit child labor; and,
- Provide a healthy and safe workplace for all employees that strives to be free from work-related injuries and illnesses.

3) **EXCEPTIONAL QUALITY IS THE NORM**

Rigorous safety and exceptional quality should be the norm for all products provided to us by our suppliers. Leprino Foods wins in the marketplace by making exceptional products that meet our customers' exacting requirements - we expect no less from our suppliers.

The quality and safety of our products is closely tied to the quality and safety of our suppliers' products. Suppliers are expected to know and comply with Leprino Foods' quality standards, policies, specifications, and procedures that apply to the products they supply, adhere to good manufacturing practices, comply with all applicable federal, state, and local food safety laws and regulations, and report any issue that could negatively affect public perception of a Leprino Foods' product or involves an issue of safety.

4) **COMPLIANCE WITH THE LEPRINO QUALITY ANIMAL CARE PROGRAM**

There is no room in our business for willful mistreatment or cruelty to animals. It is a personal affront to our core values, and gravely harms the reputation and well-being of thousands of good people earnestly trying to make a living in the dairy industry. All farmers supplying raw milk to Leprino Foods are required to be fully compliant with the Leprino Quality Animal Care policy. (see LQAC attachment)

5) **RESPECT FOR THE ENVIRONMENT; COMPLIANCE WITH LAWS**

We are committed to conducting business in a safe, environmentally responsible manner. We expect our supply partners to operate in a manner that complies with all applicable environmental, health, and safety laws, regulations, and standards, and strives to responsibly manage the impact of their business on the environment.

6) **SUSTAINABILITY**

We strive to conduct business in a sustainable and responsible manner. We believe our social, environmental, and economic success will continue if we do the right and responsible thing with respect to people, planet, and profit. We seek to do business with supply partners who share our commitment to sustainable business practices, including food safety, environmental stewardship, animal well-being, the health and safety of employees, ethical business practices, returning a profit to shareholders, and supporting those in need.

7) ENTERTAINMENT AND GIFTS

Suppliers must not provide or offer gifts to Leprino Foods employees that are of more than nominal value, outside the norms of ethical business conduct, and/or might create an appearance of impropriety - regardless of the intent of such gift.

8) BRIBES, KICKBACKS AND THE U.S. FOREIGN CORRUPT PRACTICES ACT

Suppliers are expected to fully and strictly comply with the U.S. Foreign Corrupt Practices Act at all times regardless of which country they may be based or doing business with Leprino Foods. Illegal, unethical or corrupt arrangements with suppliers, customers, government officials, or other third parties are prohibited. Any effort to obtain a personal or business advantage or benefit through improper or illegal means such as bribes, kickbacks or extortion will not be tolerated.

9) FAIR COMPETITION

Suppliers must conduct their business in compliance with all applicable competition and antitrust laws and regulations.

10) INTELLECTUAL PROPERTY

Suppliers must properly protect and safeguard any of Leprino Foods' confidential information and intellectual property rights are protected and only use such information for the benefit of Leprino Foods.

11) WE WANT YOU TO REPORT ETHICAL OR LEGAL CONCERNS

Suppliers must promptly report violations of this Supplier Code, or unethical behavior by a Leprino Foods employee, to Leprino Foods Company management. If this is not possible, suppliers should report violations or unethical behavior to the Leprino Foods Hotline, **1-855-813-7349** or online at www.leprinofoods.ethicspoint.com. Leprino Foods will attempt to provide confidentiality of such reports. However, if Leprino Foods believes, in its sole discretion, that such confidentiality prevents or hinders managing or resolving a health, safety, product quality, or environmental risk or presented other risks of injury or damage, Leprino Foods has the right to disclose all information it deems necessary.