	<b>Aspire Bakeries Vendor Code of Business Conduct</b>	
	<b>Document:</b> 04.03.03.11.01	
	<b>Program:</b> 04.0 Supplier Approval and Monitoring Program	
<b>Effective Date:</b> 11/14/2023	<b>Location:</b> Standardized	
<b>Supersedes Date:</b> 03/23/2023	<b>COMPANY CONFIDENTIAL</b>	Page <b>1</b> of <b>7</b>


*Aspire Bakeries has developed this Vendor Code of Business Conduct (“the Code”) to reflect Aspire Bakeries’ commitment to conduct business activities in full compliance with applicable laws and regulations and to be guided by integrity and honesty in all our business dealings. The aim of the Code is to help Aspire Bakeries maintain this commitment by setting standards to which Aspire Bakeries expects its vendors, their employees, agents, subcontractors, and other representatives (collectively referred to as “vendors”) to respect and adhere to when conducting their business dealings. It is the vendor’s responsibility to educate its employees, agents, subcontractors and other representatives accordingly.*

*The Code is applicable to vendors of Aspire Bakeries and its majority-owned and joint-venture owned subsidiaries. The Code contains the minimum standards applicable to Aspire Bakeries’ vendors. Vendors may have individual contracts with Aspire Bakeries that contain specific provisions and/or agreements relating to these standards. The Code is not meant to supersede such provisions and/or agreements and, to the extent there is any inconsistency between the Code and such provisions and/or agreements, the provisions and/or agreements in the separate contract shall control.*

## **SECTION I – BUSINESS PRACTICES**

Aspire Bakeries requires that all vendors observe all applicable laws and regulations, exercise the highest standards of business and personal ethics and act with integrity in an open and honest manner, including:

- A. **Anti-Bribery:** Vendors acting on behalf of Aspire Bakeries must comply with all country and local laws dealing with bribery of government officials. Vendors are not permitted to engage in any corrupt practices including bribery, kickback, corruption, extortion or embezzlement. A corrupt practice may include, but is not restricted to, a vendor or third party acting on behalf of the vendor providing anything of value, directly or indirectly, to any government official, employee of a government-controlled company, or political party to influence a decision in favor of the vendor or a customer of the vendor, or to obtain any other improper benefit or advantage. Vendors must keep and furnish to Aspire Bakeries, on request, a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of Aspire Bakeries or out of funds provided by Aspire Bakeries.
- B. **Trade Restrictions:** Vendors are not required to forego trade with Aspire Bakeries’ competitors in order to be a vendor to Aspire Bakeries. Vendors are free to sell products in competition except when otherwise agreed to in writing with Aspire Bakeries and/or where the product involved is one in which Aspire Bakeries has a substantial proprietary interest because of an important contribution to the concept, design, or manufacturing process. No vendor will be asked to buy Aspire Bakeries’ products in order to start or continue as a vendor.
- C. **Conflict of Interest:** Vendors should avoid any interaction with an Aspire Bakeries employee that may conflict with, or appear to conflict with, that employee acting in the best interests of Aspire Bakeries to the extent that the vendor has a reasonable belief, or actual or constructive knowledge, of such a conflict of interest. Vendors should immediately disclose to Aspire Bakeries any situations that might appear to be a conflict of interest. (Refer to Section IV)
- D. **Gifts, Entertainment, and Corporate Hospitality:** Aspire Bakeries employees cannot accept any gift, no matter the value, from a current vendor or a company in exchange for doing business with Aspire Bakeries.

	<b>Aspire Bakeries Vendor Code of Business Conduct</b>	
	<b>Document:</b> 04.03.03.11.01	
	<b>Program:</b> 04.0 Supplier Approval and Monitoring Program	
<b>Effective Date:</b> 11/14/2023	<b>Location:</b> Standardized	
<b>Supersedes Date:</b> 03/23/2023	<b>COMPANY CONFIDENTIAL</b>	Page 2 of 7

We believe that sound business decisions are made on the basis of value, cost, quality, and service. Such decisions are best achieved when transactions between Aspire Bakeries and its vendors and customers take place in an atmosphere of impartiality, free of personal considerations. Our policy on gifts is designed to preserve and maintain Aspire Bakeries’ reputation as an enterprise, which acts with integrity and bases decisions only on legitimate business considerations. Gifts, favors or entertainment are not needed to conduct business with Aspire Bakeries.

- E. **Communication:** Vendors may not utilize Aspire Bakeries’ name, trademarks, logos, graphics or images unless expressly permitted in writing by Aspire Bakeries. Significant agreements with distributors, brokers and vendors should be set out in writing.
- F. **Confidential Information:** Vendors who have been given access to confidential information as part of the business relationship should not share this information with anyone else unless authorized to do so by Aspire Bakeries. Vendors will be asked to sign a Confidentiality and Non-Disclosure Agreement. If a vendor believes it has given access to Aspire Bakeries’ confidential information in error, the vendor should immediately notify its contact at Aspire Bakeries and refrain from further distribution of such information.

**SECTION II – EMPLOYMENT-RELATED PRACTICES**

We expect our vendors to conduct their activities in a manner that respects human rights as set out in the United Nations Universal Declaration of Human Rights. Minimally, we expect vendors to comply with the following employment-related practices.

**The following expectations apply to all Vendors:**

- A. **Applicable Local Labor Laws:** All business activities of vendors must comply with all national and local legal requirements along with published industry standards pertaining to employment and manufacturing in the applicable country. Vendor must be able to demonstrate that all employees are eligible to work in the applicable country.
- B. **Freedom of Association:** Vendors shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations.
- C. **Forced Labor:** Vendors must not use prison labor, forced labor, labor under any form of indentured servitude, physical punishment, confinement, threats of violence, or any other forms of abuse. Vendors shall not retain workers’ government-issued identification, passports or work permits as a condition of employment.
- D. **Slavery & Human Trafficking:** The use of slavery or human trafficking (including debt bondage) by vendors is forbidden.
- E. **Child Labor Practices:** Vendors must comply with all applicable child labor laws and are prohibited from using workers under the legal age of employment in the relevant country or where work interferes with schooling requirements under applicable local laws and regulations. Vendors shall not hire any worker who is less than 15 years old regardless of the legal age of employment in the relevant country. Vendors shall not assign any worker to work in any Aspire Bakeries facility who is less than 18 years of age, regardless of the legal age of employment in the relevant country. In the event of an incident of child labor at a vendor’s facility, Aspire Bakeries must be notified of the incident and the vendor must provide corrective action plans within 48 hours.

	<b>Aspire Bakeries Vendor Code of Business Conduct</b>	
	<b>Document:</b> 04.03.03.11.01	
	<b>Program:</b> 04.0 Supplier Approval and Monitoring Program	
<b>Effective Date:</b> 11/14/2023	<b>Location:</b> Standardized	
<b>Supersedes Date:</b> 03/23/2023	<b>COMPANY CONFIDENTIAL</b>	Page <b>3</b> of <b>7</b>

- F. **Compensation:** Vendors’ workers must be fairly compensated and provided with wages and benefits that comply with applicable national and local laws. This includes paying of overtime, premium pay and equal pay for equal work without discrimination where applicable. There shall be no disciplinary deductions from pay. In the event of an audit by Aspire Bakeries or our 3<sup>rd</sup> Party auditor, vendors must be able to show twelve (12) months of payroll records for employees as requested by the auditor.
- G. **Non-Discrimination:** Vendors shall not discriminate in hiring or applying employment practices on the grounds of race, color, religion, sex, age, sexual orientation, physical ability, national origin, or any other prohibited basis or personal characteristic unrelated to job performance and will comply with all applicable employment discrimination laws.
- H. **Harassment & Abuse:** Vendors will ensure that their employees and workers are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse and will comply with all applicable laws on harassment and abuse of workers. Vendors must have internal policies prohibiting harassment or abuse of employees, along with stated disciplinary processes.
- I. **Migrant Labor:** Vendors will respect human and workplace rights for any migrant workers. Vendors and/or employment agencies should not charge, directly or indirectly, fees or commissions related to recruitment, travel and/or employment processes to those workers transported from their home country to work in facilities. Such fees should be borne by the vendor, not the worker. Terms of employment should not change from time of recruitment to that provided at the facility, and migrant workers should be free from any pressure, coercion, or threats to accept a job or to maintain employment.
- J. **Grievance Mechanism:** Vendors shall implement internal programs for handling reports of workplace grievances, including anonymous reporting.
- K. **Working Hours:** Vendors must ensure compliance with all applicable national and local laws and with published industry standards pertaining to the number of hours and days worked and overtime. All workers shall be allowed at least one (1) day off every seven (7) days, and any overtime worked shall be voluntary. If local law allows, workers may voluntarily work overtime on rest days, provided that they are allowed at least one (1) day off within the next seven (7) days. Weekly working hours should not exceed sixty (60) hours, *except in extraordinary circumstances where business conditions create the need, and overtime shall remain voluntary.*

**The following expectations apply to vendors providing on-site services to Aspire Bakeries’ bakeries, inventory centers or offices on a weekly (or more frequent) basis:**

- A. **Immigration Law Compliance:** Vendors warrant the following:
  - 1. U.S. Vendors
    - i. They have complied, and must comply, with all immigration laws, statutes, rules, codes, orders, and regulations;
    - ii. They have and will continue to utilize E-Verify to confirm employment eligibility;
    - iii. They have kept, and will keep, during the life of the relationship with Aspire Bakeries (and three years after its termination) all Form I-9 (Employment Eligibility Verifications) for employees assigned to work for the vendor at Aspire Bakeries’ location(s). The vendor must make and maintain copies of all documents confirming their workers’ employment eligibility and identity;
    - iv. At the vendors’ expense, they will engage an outside auditor, external immigration counsel, or other specialized consultant, who agrees to audit the vendors’ immigration


	<b>Aspire Bakeries Vendor Code of Business Conduct</b>	
	<b>Document:</b> 04.03.03.11.01	
	<b>Program:</b> 04.0 Supplier Approval and Monitoring Program	
<b>Effective Date:</b> 11/14/2023	<b>Location: Standardized</b>	
<b>Supersedes Date:</b> 03/23/2023	<b>COMPANY CONFIDENTIAL</b>	Page 4 of 7

compliance and required I-9 recordkeeping, and then certify the results of the audit to Aspire Bakeries upon reasonable request by Aspire Bakeries;

- v. They have responded, and will promptly respond, to any demand for inspection of vendors' immigration records by the Department of Homeland Security (US), Science and Technology Directorate (Canada) or any other government agency;
- vi. They will immediately (and within no more than 24 hours) notify Aspire Bakeries in writing of any inspections by DHS or any other governmental agency concerning any immigration compliance issues or concerns involving the vendors or their employees;
- vii. They have developed and will maintain an immigration compliance plan regarding their employment-eligibility verification, recordkeeping, and training of employees in I-9 procedures and immigration law requirements;
- viii. They will discharge or remove any employee assigned to an Aspire Bakeries' location(s) who Aspire Bakeries reasonably believes lacks employment authorization;
- ix. To the extent applicable, they will comply with the expectations list described in Migrant Workers Section II-I of this Code of Conduct.

2. Non-U.S. Vendors

- i. They have complied, and must comply, with all immigration laws, statutes, rules, codes, orders, and regulations;
- ii. At the Vendor's expense, they will engage an outside auditor, external immigration counsel, or other specialized consultant, who agrees to audit the Vendor's immigration compliance, and then certify the results of the audit to Aspire Bakeries upon reasonable request by Aspire Bakeries;
- iii. They have responded, and will promptly respond, to any demand for inspection of Vendor's immigration records by any other government agency;
- iv. They will immediately (and within no more than 24 hours) notify Aspire Bakeries in writing of any inspections by any governmental agency concerning any immigration compliance issues or concerns involving the Vendor or their employees;
- v. They have developed and will maintain an immigration compliance plan regarding Vendor's employment-eligibility verification, recordkeeping, and training of employees in immigration law requirements;
- vi. They will discharge or remove any employee assigned to Aspire Bakeries' location(s) who Aspire Bakeries reasonably believes lacks employment authorization;
- vii. To the extent applicable, they will comply with the expectations list described in Migrant Labor Section II-I of this Code of Conduct.

	<b>Aspire Bakeries Vendor Code of Business Conduct</b>	
	<b>Document:</b> 04.03.03.11.01	
	<b>Program:</b> 04.0 Supplier Approval and Monitoring Program	
<b>Effective Date:</b> 11/14/2023	<b>Location:</b> Standardized	
<b>Supersedes Date:</b> 03/23/2023	<b>COMPANY CONFIDENTIAL</b>	Page 5 of 7


**SECTION III – FACILITY PRACTICES**

**The following expectations apply to all vendors:**

- A. **Workers’ Accident Insurance:** Vendors must have adequate accident insurance (e.g., Workers’ Compensation) for all workers as required by law.

**The following expectations apply to vendors providing goods and services to Aspire Bakeries from their own facilities:**

- B. **Workplace Environment:** Vendors must provide their workers with safe and healthy working conditions and, where provided, living conditions. This includes at a minimum: potable drinking water, adequate and clean restrooms, adequate ventilation, fire exits, essential safety equipment, emergency first aid kit, access to emergency medical care, and appropriately lit workstations. Vendors shall ensure that all workers receive communications and training on emergency planning and safe work practices. In addition, vendors shall have systems to prevent, detect, and respond to potential risks to the safety, health, and security of all employees. Vendors’ facilities must be constructed and maintained in accordance with the standards set by applicable national and local laws, codes and ordinances.
- C. **Documented Processes:** Vendors’ facilities must develop and maintain processes, checklists, records, and corrective actions pertaining to:
  1. Purchasing, storing, handling, and use of chemicals, as well as emergency response procedures to prevent injuries to employees and emissions to the atmosphere or contamination of ground or water systems.
  2. Handling, storing, transporting, recycling and disposing of hazardous and non-hazardous waste including procedures to protect worker safety and prevent emissions to air or contamination of ground or water systems.
  3. Posting evacuation maps and annual evacuation drills for all shifts and employees
  4. Ergonomic assessment in conjunction with job safety analyses to reduce risks to employees
- D. **Product Quality and Safety:** All products and services delivered by a vendor must meet the necessary specifications and criteria outlined by Aspire Bakeries’ food safety & quality assurance policies and procedures.
- E. **Sustainability and Environment:** Vendors must comply with all national and local environmental laws and regulations. Vendors are responsible for managing, measuring, and minimizing the environmental aspects of their facilities. Specific focus areas include air emissions, waste reduction, water use and discharge, and carbon emissions.
  1. Vendors should develop and share a plan to reduce energy, water, and waste to landfill in their facilities.
  2. Vendors will work with Aspire Bakeries to ensure that raw materials sourced on behalf of Aspire Bakeries are grown and processed in a sustainable manner.

	<b>Aspire Bakeries Vendor Code of Business Conduct</b>	
	<b>Document:</b> 04.03.03.11.01	
<b>Effective Date:</b> 11/14/2023	<b>Program:</b> 04.0 Supplier Approval and Monitoring Program	
<b>Supersedes Date:</b> 03/23/2023	<b>Location:</b> Standardized	
	<b>COMPANY CONFIDENTIAL</b>	Page 6 of 7

#### **SECTION IV - REPORTING POTENTIAL MISCONDUCT**

Vendors who believe that an Aspire Bakeries employee, or anyone acting on behalf of Aspire Bakeries, has engaged in illegal or otherwise improper conduct with respect to their business should report the matter to Aspire Bakeries. Vendors should also report any potential violation of the Code. Reports may be made at [codeofconductNA@ASPIREBAKERIES.com](mailto:codeofconductNA@ASPIREBAKERIES.com). Reports will be handled in a confidential manner to the extent possible. A vendor's relationship with Aspire Bakeries will not be adversely affected by any report of potential misconduct made in good faith.

#### **SECTION V: AUDITS**

Vendors should maintain accurate and transparent books, records, and accounts to demonstrate compliance with applicable laws and regulations, and this Code. Aspire Bakeries reserves the right to verify vendors' compliance with the Code. If Aspire Bakeries becomes aware of any actions or conditions that are not in compliance with the Code, Aspire Bakeries reserves the right to demand corrective measures. Aspire Bakeries reserves the right to terminate an agreement with any Vendor who does not comply with the Code.

Updates of the Code will be posted on: [www.AspireBakeries.com](http://www.AspireBakeries.com)

**This document is required to be signed by an officer of your company. PLEASE CHECK BOTH BOXES AND ENTER YOUR CONTACT INFORMATION BELOW:**

- I have read and fully understand this policy and its guidelines.
- I agree to allow announced audits of this Vendor Code of Conduct at any facility that provides products or services to Aspire Bakeries. For on-site vendors, the audit can be conducted in the Aspire Bakeries facility or in your office. These audits may be conducted by employees of Aspire Bakeries or a 3<sup>rd</sup> party audit firm. Vendors are responsible for the cost of any audits or subsequent follow-up audits.

---

Signature

Date

---

Print Name

Title

---

Print Company Name(s)

Telephone Number *(Country Code, Area Code, Number)*

---

E-Mail Address



**Aspire Bakeries Vendor Code of Business Conduct**

**Document:** 04.03.03.11.01

**Program:** 04.0 Supplier Approval and Monitoring Program

**Effective Date:** 11/14/2023

**Location:** Standardized

**Supersedes Date:** 03/23/2023

**COMPANY CONFIDENTIAL**

Page **7** of **7**

#	Step/Section Revised	Revision(s)	Prepared By	Date	Approved By	Date
0	All	New	B. Edwards	03/29/17	C.Lu	03/29/17
1	Header/Footer	Update to AIMS Format	W. Haraguchi	09/06/17	B. Edwards	09/06/17
2	All	Updated Version	B. Edwards/C. Woo	02/28/19	Exec Comm	04/23/19
3	Header	Annual Review	B. Edwards/C. Woo	10/1/20	Exec Comm	10/1/20
ETQ #	Step/Section Revised	Revision(s)	Prepared By	Date	Approved By	Date
0	All	Updated logo and removed ARYZTA reference; Updated to new ETQ version Removed mention of global throughout doc	J. Embleton	06/30/21	D. Flahive	06/30/21
1	Revised	Transition to Aspire w/Correct revision doc	A. Hoover	9/30/21	B. Edwards	9/30/21
2	Revised	Fixing Technical issue w/Doc	A. Hoover	10/20/21	B. Edwards	10/21/21
3	Revised	Updated policy	A. Hoover	03/23/23	C. Woo	03/23/23
4	Revised	Annual Review & Update	A. Hoover	11/14/23	C. Woo	11/14/23