The Scoular Company's

Global Supplier Code of Conduct



SCOULAR™

The Scoular Company (“Scoular”) is committed to acting with integrity and high ethical standards in all of our business dealings and interactions around the world. It is this commitment that has helped us be a trusted partner to provide safe and reliable supply chain solutions to our customers for more than 125 years. As part of our commitment to our customers, we are grateful for our strong Supplier relationships. We count on our Suppliers as valuable business partners to help us uphold our values and commitments to our customers and to work together to achieve continued success. “Suppliers” refers to farmers, producers, manufacturers and any other third party that provides goods or services to Scoular or its affiliates, either directly and/or indirectly. We expect our Suppliers to communicate these expectations throughout their supply chains, including with any Supplier sub-contractors and ensure they adhere to this Supplier Code of Conduct (the “Supplier Code”).

This Supplier Code outlines Scoular’s expectations related to legal compliance, treatment of others with respect and dignity, honest and transparent business dealings, protection of information, assets and interests and contribution as a global corporate citizen.

COMPLY WITH THE LAW

Suppliers must comply with all applicable laws, rules, and regulations in every country of operation. Some laws extend beyond the borders of a specific country. For example, anti-bribery and trade sanctions laws in the U.S. apply to our operations around the globe. All Suppliers are responsible for understanding the laws that apply to their business and complying with those laws. In some instances, the laws of two or more countries may appear to conflict. Where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles.

TREAT COWORKERS AND OTHERS WITH DIGNITY AND RESPECT

Harassment, discrimination, and/or inappropriate conduct is strictly prohibited. Scoular Suppliers shall provide their employees a work environment that is free from unlawful harassment, inappropriate conduct and retaliation. Scoular Suppliers shall not tolerate harassment of, and/or inappropriate conduct towards employees or third parties by anyone.

SUPPORT DIVERSITY, EQUITY AND INCLUSION

Scoular is committed to continuously evolving our culture. We believe in the importance of welcoming diverse perspectives and in the value of embracing a multi-cultural mindset. In addition to the diversity and inclusion commitments we have made in our sustainability strategy, diversity and inclusion is an important piece of our overall business strategy. We expect our Suppliers to share our commitment to increasing diversity and fostering inclusion in both our workplaces and communities. We encourage our Suppliers to share with us the steps they are taking to support diversity, equity, and inclusion.

ENSURE A SAFE AND SECURE WORK ENVIRONMENT

Everyone has the right to expect a safe and secure work environment. Suppliers shall be committed to providing such an environment and complying with all applicable legal requirements. There is no production goal, cost, time-saving measure, or competitive advantage that is ever worth engaging in unsafe behavior. Suppliers should give employees the resources to identify a real or potential safety concern without fear of retaliation. Acts or threats of violence, bullying, intimidation, or other hostile behavior are prohibited.

PROTECT CONFIDENTIALITY AND INTELLECTUAL PROPERTY RIGHTS

Suppliers must respect confidential information and intellectual property rights of Scoular and other third parties. Intellectual property includes trademarks, copyrights, patents, and trade secrets. All confidential information should not be disclosed to anyone and is subject to a written confidentiality agreement.

ENGAGE IN HONEST AND TRANSPARENT BUSINESS DEALINGS

Suppliers must demonstrate high levels of business integrity, and be fair, honest, and trustworthy in all business dealings. In correlation with The Foreign Corrupt Practices Act and the local laws of other countries, Scoular prohibits suppliers from engaging in bribery of any kind. This includes offering, promising, lending or paying money or anything of value (including gifts and entertainment), whether directly or indirectly, for the purpose of influencing business dealings.

KEEP ACCURATE BUSINESS RECORDS

Suppliers shall keep accurate business records that fairly reflect their business transactions. All information and transactions should be recorded in a clear, concise, truthful, accurate, and confidential manner. All of Scoular's Supplier relationships are conducted by way of appropriate written contract or purchase orders, which shall be kept in accordance to Scoular's documentation policies, practices, and protocols.

COMMIT TO GRAIN, FOOD, FEED, PETFOOD AND OILSEED SAFETY

Scoular is committed to the safety and quality of products throughout our supply chain, and we have employed processes and standards consistent with that commitment. Supplier's grain, food, feed, petfood and oilseed safety practices shall comply with Scoular's standards for safety and quality.

PROTECT HUMAN RIGHTS AND WORKING HOURS

Suppliers shall be committed to and support international efforts to promote and protect human rights. Scoular will not do business with Suppliers who engage in human trafficking, employ forced or child labor, or use corporal punishment to discipline employees, regardless of whether such practices are permitted by applicable laws.

Additionally, Suppliers must comply with applicable local laws related to working hours. Any required overtime must not only comply with applicable law but must be reasonable and properly communicated to employees.

RESPECT FREEDOM OF ASSOCIATION

Suppliers shall respect the rights of employees to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws. Scoular encourages Suppliers to engage in open and direct communication with employees to resolve workplace concerns and compensation issues.

PROTECT THE ENVIRONMENT

All Suppliers must comply with applicable environmental laws wherever they operate and should work towards environmentally responsible business practices. Scoular recognizes our role as a global citizen, and we are committed to long-term sustainability practices that reflect high-integrity business practices. Our sustainability strategy consists of five pillars, with milestones and goals that we are working to achieve including engaging in our communities, fostering responsible marine product sourcing, promoting diversity and inclusion, reducing our carbon footprint, and upholding workplace health and safety.

Scoular expects our Suppliers to strive to reduce environmental impact both directly and indirectly and we encourage Suppliers to take meaningful steps to create and enhance sustainability practices in their own businesses and supply chains.

ADHERE TO COMPLIANCE AND AUDITING

Scoular expects our Suppliers to adhere to the principles contained in this Supplier Code. We reserve the right to request information from our Suppliers related to compliance with this Supplier Code and we reserve the right to both verify compliance with this Supplier Code through internal and external assessments. Failure to adhere to this Supplier Code may result in Scoular's decision to terminate its business relationship with Supplier.

REPORT A CONCERN

Scoular expects our Suppliers to report suspected violations of the Supplier Code. If a Supplier sees or suspects someone of acting outside of Scoular's commitment to safety, integrity, honesty, and/or this Supplier Code, or suspect illegal or inappropriate activity or behavior or have questions about appropriate courses of action, it is the supplier's responsibility to report it to Scoular via our complaint hotline, OpenDoor. Comments or complaints through OpenDoor are managed by our outside, third-party provider Ethicspoint, and can be made via their website, at scoular.ethicspoint.com, or by reporting the concern by phone:

U.S. and Canada: 855-845-3451

China: 4006013692

Mexico: 001-844-451-7908

Indonesia: 800-140-1984

Singapore: 800-110-2212

Myanmar: Via web