



Supplier Social Responsibility **CODE OF CONDUCT**

Suppliers play a key role in our efforts to ensure that we manage our global supply chain in a sustainable way. This Code of Conduct establishes our expectations of suppliers in areas that present near-term and long-term supply risk. Our supply agreements require direct suppliers to comply with all laws, including policies on child and forced labor. We have various tools to address non-compliance, which may include, but are not limited to, a corrective action plan. If the supplier does not resolve the issues of concern in a timely and satisfactory manner, Irving reserves the right to take more drastic action, such as termination of the business arrangement.

It is important to Irving, our customers and our consumers that suppliers consistently abide by this Code of Conduct. We believe that compliance with all applicable laws is the foundation for sustainability. But in addition to compliance, we encourage suppliers to make continuous improvement as they identify new and innovative ways to create value and mitigate risk in the social, environmental and economic dimensions of sustainability.

Code of Conduct

SOCIAL:

Helping make people's lives better through the products we make, support for the communities in which we live and work, maintaining quality work environments, and sourcing responsibly.

Child Labor

Suppliers must not directly (or indirectly through the use of its subcontractors) employ underage individuals as defined by applicable child labor laws.

Forced Labor

Suppliers must not use forced labor or involuntary prison labor, which means any work or service performed involuntarily under threat of physical or other penalty. Suppliers shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment. If workers enter into employment agreements with suppliers, workers should do so voluntarily.

Working Hours and Compensation

Suppliers must comply with all applicable minimum wage, overtime and maximum hour laws, as well as other wage and hour regulations.

Security

Suppliers must implement measures to secure our international supply chain and comply with all applicable customs and anti-terrorism laws.

Freedom of Association

Suppliers must comply with applicable laws related to an employee's choice to join, or refrain from joining, any legally sanctioned association or organization.

Non-Discrimination

We are committed to providing a workplace that is free from discrimination. Suppliers must maintain a work environment that respects the dignity and worth of each individual and not discriminate on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed/religion, sex, gender expression, gender identity, sexual orientation, age, marital status, family status, disability or any other protected factor or activity, as defined by applicable law or regulation.

Community

We value suppliers that maintain their long-term social license to operate by being good corporate citizens in the communities in which they have operations.

ENVIRONMENTAL:

Using resources wisely, complying with laws, minimizing the impact of our facilities by operating in a safe, responsible and efficient manner, and reducing the adverse impact of our products in use.

Health & Safety

Suppliers must provide and maintain a safe and healthy working environment that meets or exceeds applicable laws and regulations for occupational safety and health, and provide its employees with access to potable water and clean sanitation facilities

Environment & Sustainability

Suppliers must meet all applicable environmental rules, regulations and laws in the countries where they do business. In addition, we encourage our suppliers to consistently look for new and better ways to conserve resources, reduce the impact of products in use, and reduce manufacturing waste.

Product Certifications

In addition to standard safety and product stewardship assurances, we encourage suppliers to evaluate potential certifications as tools to verify and communicate the ongoing application of sustainable practices in sourcing, manufacturing and quality management activities.

ECONOMIC:

Driving long-term profitability, providing products and services that are preferred, creating greater value for our customers and consumers, supporting economies through the purchase of goods and services, paying taxes and providing other forms of community support.

Business Integrity

We expect suppliers to operate with integrity. Suppliers must not offer bribes, kickbacks or other improper, undocumented payments for the purpose of garnering favorable treatment by a third party, including any government. Suppliers must comply with any anti-corruption laws in the jurisdictions in which they do business.

Financial Responsibility

Suppliers are expected to develop and apply appropriate internal controls, accountability and governance models that ensure accurate reporting and encourage financial stability.

Value Creation

We expect our suppliers to: provide products and services that meet our quality and safety standards; deliver products and services at the lowest total cost of ownership, including all associated purchase, converting, inventory, storage and handling, transportation, distribution, use and disposal costs; and seek new and innovative ways to further improve quality and performance, while reducing total cost.

Audits

Upon reasonable notice, suppliers must allow and assist us in periodically auditing their compliance with any and all aspects of this Supplier Social Responsibility Code of Conduct