
PRINCIPLES AND STANDARDS POLICY FOR RESPONSIBLE BUSINESS PRACTICES

Purpose:

Greenfield Global Inc. and its affiliates and subsidiaries (Greenfield) are committed to conducting business with integrity and in accordance with applicable laws and regulations.

In order to reflect our core principles and values and achieve our mission, Greenfield and its employees adhere to the important principles and standards set forth in this Standards for Responsible Business Practices document (Principles).

MISSION

Unlock the potential of people, partnerships, and nature to accelerate sustainable solutions for the health of the planet

CORE PRINCIPLES

Innovative, Collaborative, Agile, Responsible, Disciplined

CORE VALUES

Integrity, Honesty, Respect, Commitment, Open to Change

As an industry leader and a responsible business, Greenfield seeks to do business with companies that share similar ethics and values. Therefore, we expect that our suppliers and vendors (Suppliers) comply with these Principles as a condition of doing business with us and promptly notify us in writing of any known or suspected violation of these Principles, as well as cooperate with our team to ensure compliance with these Principles. Suppliers may acknowledge these Principles by confirming acceptance in writing, providing a copy of their own principles or code of conduct that embrace these standards, or by continuing to do business with Greenfield.

Greenfield reserves the right to conduct reasonable audits or assessments to ensure compliance with these Principles. Greenfield may terminate a relationship with any Supplier that does not comply with these Principles. Greenfield employees who violate these Principles are also subject to discipline.

Any person who becomes aware or reasonably believes that a violation of these Principles has occurred should email compliance@greenfield.com.

BUSINESS PRACTICES

Compliance with Laws:

- Comply with Laws. “Laws” means all laws, regulations, directives, rules, decrees, and governmental orders that are applicable to a person’s business and operations in all the jurisdictions in which they are located or buy or sell products or services.

Sustainability:

- Recognize that adverse effects on the community, environment, and natural resources must be minimized to safeguard the health and safety of the public.
- Observe and comply with all environmental Laws (including environmental permitting, handling of hazardous materials, and emissions requirements).
- Seek opportunities that promote the efficient use of resources, as well as clean and low energy solutions.
- Maintain reasonable documentation and records of their organization’s carbon footprint and efforts to reduce it, and provide this documentation if requested.

Responsible Sourcing:

- Conduct business with responsible and ethical suppliers.
- Maintain traceability of the country of origin for all primary materials.
- Ensure that any materials which are restricted, or which require governmental disclosure, are correctly and accurately reported and disclosed.

Conflicts of Interest:

- Avoid all conflicts of interest or situations giving the appearance of a conflict of interest, such as a direct personal or financial interest in a business decision or supplier or vendor selection.
- Immediately disclose actual, potential, or perceived conflicts of interest.

Anti-Bribery/Corruption:

- Comply with all Laws relating to anti-corruption, anti-money laundering, and the prevention of fraud and other financial crime (including tax evasion and its facilitation).
- Select suppliers solely on the merits of their products and services.

Gifts and Gratuities:

- Never directly (or indirectly through an intermediary) offer, promise, authorize, give or receive, anything of value, such as payments, gifts, entertainment or courtesies, with the intent or effect of inducing anyone to forego their duties and/or provide an unfair business advantage.

Antitrust, Anti-Competitive Practices and Fair Competition:

- Comply with all fair competition Laws and do not engage in illegal monopolies, illegal behavior, price fixing, collusive bidding, price discrimination, or other unfair practices.
- Do not participate, directly or in association with any other person, in any agreement or practice that unreasonably restricts competition, abuses market power, or otherwise promotes anticompetitive practices.

Affiliation with Government and Government Officials:

- Ensure that any contributions or activities supporting candidates or political organizations are made/performed in compliance with election, fundraising, and/or bribery Laws, and are not made/performed for any improper purpose.
- For Suppliers, disclose if any government or government official owns, directly or beneficially, an interest in your business of more than 5%. The following are examples of persons who may be considered government officials: (i) any officer or employee of a government, regardless of rank; (ii) employees of government-owned or government-controlled businesses; (iii) politicians, political parties, or candidates for office; and (iv) a family member or agent of the above.

Embargoes and Trade Law:

- Comply with all trade Laws, embargoes, sanctions, and restrictions, including those imposed by the United Nations, Canada, the United States, and the European Union.

Intellectual Property:

- Respect, safeguard, and protect all intellectual property, whether of Greenfield or any other person.
- Refuse to misuse others' intellectual property and obtain proper authorization/licensing prior to use.
- Promptly provide notice if there is any suspicion that any product that Greenfield purchases or uses infringes on the intellectual property rights of any person (including any products that Supplier sells).

Information Security:

- Protect the confidential, proprietary, and personal information that you handle or otherwise process by implementing appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including the risk of accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to such information (Data Breach).
- In the event, or upon reasonable suspicion, of a Data Breach, immediately notify all affected and/or interested parties (regardless of any assessment of the impact or risk of such Data Breach) and make available all information reasonably requested to assist in the investigation and remediation of such Data Breach.

Data Privacy:

- Comply with all applicable data protection, privacy, and information security Laws (Data Protection Laws).
- Do not render any service in a manner that causes any person to violate Data Protection Laws.
- Notify all affected and/or interested persons (regardless of any assessment of the impact or risk) if you are, or reasonably believe that you will be, in breach of any Data Protection Laws or will be prevented from performing any of your contractual obligations.

Records Maintenance:

- Create and maintain complete and accurate records to ensure accountability.
- Do not alter or omit any record to conceal or misrepresent the information, event, or transaction documented.
- Retain and delete records in accordance with Laws.

WORKFORCE AND WORKPLACE PRACTICES

Human Rights and Workplace Laws:

- Comply with all human rights Laws.
- Apply workplace Laws and standards to all workers, including temporary, part-time, agency, migrant, student, contract, and direct employees.

Workplace Safety and Security:

- Provide a safe and secure workplace for all employees, and prevent accidents to employees, customers, and visitors.
- Where required or appropriate, provide safety equipment, guards, and protective clothing/masks to protect workers from hazardous machinery and materials, fire suppression and evacuation protocols, and implement security measures to ensure worker's while on, entering or exiting premises.

Child Labour:

- Do not engage in or condone the unlawful employment or exploitation of children in the workplace or elsewhere.
- Combat the exploitation of children and ensure that all vendor, suppliers and others with whom you do business do not use child labour.
- Cooperate with law enforcement to address any observed or suspected instances of child labour.
- Conform to Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor) of the International Labor Organization.

Human Trafficking, Slavery and the Right to Voluntary Labour:

- Respect the free choice of all persons and strictly prohibit forced or compulsory labor for any employees.
- Do not do business with, tolerate, or associate with organizations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.
- Work to raise awareness within its employee population of the responsibility to protect human rights.
- Cooperate with law enforcement to address any observed or suspected instances of human trafficking, slavery and involuntary labour.
- Comply with the UN Guiding Principles on Business and Human Rights.

Working Hours and Wages:

- Comply with all Laws concerning employee wages and hours.
- Be an ethical employer that strives to improve labour standards, respect employee contributions and reward them fairly.

Freedom of Association and Collective Bargaining:

- Respect the rights of employees and comply with all Laws concerning freedom of association and collective bargaining.

Freedom Against Prejudice and Discrimination:

- Proactively invest in equality, diversity, and inclusion.
- Ensure that the workplace is free of harassment and discrimination based on a person's race, colour, religion, national or ethnic origin, gender, sexual orientation, gender identity, age, mental or physical disability, political beliefs, veteran or military status or other characteristics protected by Law.

No Harassment or Abuse:

- Treat all employees with respect and dignity.
- Strictly prohibit any kind of harassment, intimidation, victimization, or abuse of employees (whether physical, psychological, or sexual).

Non-Retaliation and Violation Reporting:

- Encourage and provide means for employees to report violations of these Principles or concerns of potentially unlawful or unethical activities in the workplace, without fear of retaliation or threat of reprisal, intimidation, or harassment.
- Treat such reports in a confidential manner.
- Investigate and take corrective action on any report as needed.