

## **Business Partner Code of Conduct**

Henry P. Thomson, Inc. conducts its business in accordance with high ethical and legal standards and expects our business partners to share in this philosophy. We utilize these standards in the selection of our manufacturers, service providers, contractors, subcontractors, and suppliers (“Business Partners”), expecting full compliance. It is imperative that our customers have confidence that our Business Partners are in full compliance and adhere to all Henry P. Thomson, Inc. – Business Partner Code of Conduct policies as set forth herein. Participation in this program and adherence to program policy is mandatory for all Henry P. Thomson, Inc. Business Partners.

This Business Partner Code of Conduct sets forth Henry P. Thomson, Inc.’s standards and expectations with respect to key areas of corporate responsibility and is intended to supplement Henry P. Thomson, Inc.’s other policies and codes of conduct, as applicable. Our goal is to work with our business partners to ensure compliance with these requirements

### **I. LEGAL COMPLIANCE AND BUSINESS INTEGRITY**

Business Partners must comply with all applicable laws and regulations in their country of operation. Also, Business Partners must not directly or indirectly give or receive improper business advantage via the giving or receiving of anything of value in exchange for preferential treatment.

#### **GUIDANCE:**

- The following procedures are prohibited: bribing, conflict of interest, falsification of documents, collusive bidding, price fixing, price discrimination, or unfair trade practices in violation of antitrust laws.
- The Foreign Corrupt Practices Act (FCPA) makes it unlawful for certain classes of persons and entities to make payments to foreign government officials to assist in obtaining or retaining business.
- Business Partners should take appropriate steps to protect confidential and proprietary information belonging to Henry P. Thomson, Inc.

### **II. SOCIAL AND WORKING CONDITIONS**

#### ***Child Labor***

Henry P. Thomson, Inc. is committed to the elimination of the “worst forms of child labor,” as defined by International Labor Organization (ILO) Convention 138 & 182, from its supply chain. We expect our Business Partners to support and participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

GUIDANCE:

- Children should not be kept from school to work on the farm
- Children should not carry heavy loads that harm their physical development
- Children should not be present on the farm while farm chemicals are applied
- Young children, generally considered to be less than 14 years of age, should not use sharp implements
- Trafficking of children and forcing children to work are included among the Worst Forms of Child Labor (WFCL).

***Forced/Prison Labor***

Business Partners must not utilize or benefit in any way from forced or compulsory labor, nor utilize factories or subcontractors that force unpaid labor. The use of official prison rehabilitation programs is not a breach of the Code.

GUIDANCE:

- Business Partners must not utilize or benefit in any way from forced or compulsory labor, including any forms of slavery.
- The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force, coercion or other means, for the purpose of exploiting them is prohibited.

***Working Hours and Wages***

Business Partners should provide wages at least equal to the applicable legal minimum wage and any associated statutory benefits. If there is no legal minimum age, Business Partners must ensure that wages are at least comparable to those at similar establishments in the local area or to prevailing industry norms. Working hours should reflect applicable legal norms and overtime hours should be paid at the legally mandated premium or at least the same rate as regular hours worked if there is no mandated premium.

GUIDANCE:

- Business Partners must comply with applicable laws regarding working and overtime hours.
- Regularly, except for operational circumstances, Business Partners should provide employees with at least one day off following six consecutive work-days.
- Total working hours must be within allowable limit under applicable law or agreement.

- Business Partners must comply with legal minimum wage laws and regulations, and overtime hours must be paid at the legally mandated premium.
- Accurate written records of employees' regular and overtime hours should be maintained.

### ***Non-Discrimination***

Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, should be made solely on the basis of the skill, ability and the performance of workers. Discrimination is not permitted on the basis of race, religion, gender, political opinion, national extraction, or social origin. In addition, unfair treatment of pregnant employees is prohibited.

### ***Employee Discipline***

Business partners must not utilize physical or mental punishment, including psychological coercion, against their employees, perceived or otherwise. Employees shall be treated with dignity and respect at all times.

### ***Health and Safety***

The Supplier must provide employees with a safe and healthy working environment that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment. Practices must comply with all relevant local and national laws, codes and regulations.

#### **GUIDANCE:**

- Business Partners provide a safe and healthy workplace. Safety and Health procedures must comply with all relevant local and national laws, codes and regulations
- Records of health and safety trainings, accidents and injuries at the workplace, should be maintained.
- Business Partners must train employees on emergency evacuation procedures
- If applicable, Business Partners must ensure dormitories are clean, well maintained, and in compliance with safety regulations.



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### **III. ENVIRONMENT AND SUSTAINABILITY**

Environmental impact is a key part of Henry P. Thomson, Inc.'s business practices and the company is committed to supporting sustainable operational and agricultural production practices, such as the Food and Agricultural Organization (FAO) of the United Nations – Good Agricultural Practices (GAP) initiative. At a minimum, Business Partners must fully comply with all local environmental laws and regulations and should strive to conduct their operations in a way that conserves natural resources.

#### ***Pollution Prevention and Resource Reduction***

Business Partners should reduce waste and usage of all types by implementing appropriate conservation measures in their operations. Improvement plans for waste reduction, recycling, energy conservation and greenhouse gas mitigation policies should be in place along with demonstrable evidence of implementation.

#### ***Environmental Permits and Reporting***

Business Partners must obtain, maintain and keep current all required environmental permits (e.g. discharge monitoring) and registration and any operational and reporting requirements shall be followed.

#### ***Wastewater and Solid Waste***

Wastewater and solid waste are to be monitored, controlled and treated as required prior to discharge or disposal and records of effluent monitoring shall be maintained.

#### ***Air Emissions***

Air emissions generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge and records of air monitoring shall be maintained.

### **IV. COUNTY OF ORIGIN**

Business Partners must not use deceptive trade practices to deliberately misrepresent country of origin in order to evade quota or other import restriction or duties on any product(s) sold to us.



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## **V. FOOD SAFETY AND QUALITY**

Henry P. Thomson, Inc. is dedicated to providing safe high-quality products, and its Business Partners must deliver products and services that meet food safety and quality standards required by applicable law and Henry P. Thomson, Inc.'s quality standards.

## **VI. VERIFICATION AND COMPLIANCE**

Business Partners should have adequate monitoring and record keeping systems to ensure compliance with the Code. Henry P. Thomson, Inc. reserves the right to monitor, review and verify compliance with the Code.

### **GUIDANCE:**

- In case of Non-Compliance, corrective actions will be set forth, in order to comply with laws and regulations.
- Henry P. Thomson, Inc. reserves the right to terminate its business relationship with a Business Partner who is unwilling to comply with the Code.

## **VII. SUPPLIER'S CERTIFICATION OF COMPLIANCE**

By its acceptance of any purchase order from Henry P. Thomson, Inc. or acceptance of any payment from Henry P. Thomson, Inc. for goods and services, the Business Partners acknowledge its acceptance of the Code and intention to comply with its requirements.

Business Partner agrees to permit and fully cooperate with any inspection or audit by Henry P. Thomson, Inc. or its representatives at Business Partner's facilities or the facilities of Business Partner's direct or indirect supplier(s). Failure to comply with the requirements detailed in this document may lead to the immediate cancellation by Henry P. Thomson, Inc. of all outstanding purchase orders, statements of work or other business with Business Partner. Furthermore, Henry P. Thomson, Inc. reserves the right to reject or return any products not produced in compliance with the foregoing and to charge Business Partner for any and all cost, expenses, and/or losses in connection with such rejection or return resulting from Business Partner's failure to comply with said standards.