



A healthy products company

Supplier Partner Code of Conduct

SunOpta Inc. and Supplier Partners conduct their business in accordance with the spirit, as well as the letter, of the law. We believe in and adhere to standards of ethical conduct in all business operations, even beyond the strict requirements of the law, applicable to all SunOpta Group Companies and to all Supplier Partners in respecting and upholding our Code of Conduct.

SunOpta selects its agents, contractors, distributors, suppliers and consultants based on their abilities to perform the required work competently and comply with the SunOpta Supplier Partners Code of Conduct.

This policy has been established to set forth the standards that govern all SunOpta Group Supplier Partners in the performance of their duties on behalf of the respective members of the SunOpta Group, and in accordance with all existing and future business relationships.

Suppliers Partners must be prepared to provide SunOpta with information about subjects mentioned in this guideline.

In accordance with SunOpta's Code of Conduct, Supplier Partners must be prepared to be audited by SunOpta or by an authorized 3rd party representative.

The SunOpta Supplier Partner Code of Conduct encompasses our philosophy, guidelines, and policies as they relate to:

1. Child Labor
2. Prison Labor/Forced Labor
3. Disciplinary Practices
4. Legal Requirements
5. Industry Standards
6. Ethical Standards
7. Traceability
8. Working Hours
9. Wages and Benefits
10. General Labor Practices
& Freedom of Association
11. Discrimination
12. Community Involvement
13. Health & Safety
14. Environment
15. Privacy and Confidentiality
16. Product Safety
17. Management Systems



1. Child Labor

All Supplier Partners (excluding farmers and growers):

- Workers can be no less than 15 years of age and not younger than the compulsory age to be in school. We will not utilize partners who use child labor in any of their facilities.

Farmers/Growers Sector (as defined by the US Department of Labor):

1. Applicable local laws must be followed.
2. Youths ages 16 and above may work in any farm job at any time.
3. Youths aged 14 and 15 may work outside school hours in jobs not declared hazardous as defined by the US Department of Labor.
4. Youths 12 and 13 years of age may work outside of school hours in non-hazardous jobs in farms that also employ their parent(s) or with written parental consent.
5. Youths under 12 years of age may work outside of school hours in non-hazardous jobs with parental consent.
6. Local youths 10 and 11 may hand harvest short-season crops outside school hours if their employers have obtained special waivers from the appropriate labor department.
7. Youths of any age may work at any time in any job on a farm owned or operated by their parents.

We support the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

2. Prison Labor/Forced Labor

We will not utilize or purchase materials from Supplier Partners that use any prison, indentured, or forced labor. The Supplier Partner must not use involuntary labor of any kind, including prison labor, indentured, debt bondage, or forced labor by governments.

If the Supplier Partner recruits foreign contract workers, the Supplier Partner must pay agency recruitment commissions and does not require any worker to remain in employment for any period of time against his or her will.

3. Disciplinary Practices

We will not utilize Supplier Partners who use corporal punishment or other forms of physical or psychological coercion. Supplier Partners must treat all workers with respect and dignity and provide them with a safe and healthy work environment. All supplier partners will be required to have approved written guidelines relating to employee working treatment and conditions.

4. Legal Requirements

All Supplier Partners should be in good standings with all local and national applicable government laws and regulations. We expect our Supplier Partners to be law abiding as individuals and to comply with legal requirements relevant to the conduct of all their businesses.

Supplier Partners must observe and be in compliance with Rules of Origin laws and regulations.

5. Industry Standards

Supplier Partners must be in compliance with applicable industry recognized certification standards such as organic, fair trade, HAACP, Halal, Kosher and other certifications.

- Commit to the development and use of the highest standards and practices for organic production, processing, and handling. Observe all state, provincial, federal, and international regulations pertaining to organic production, processing, and handling.
- Commit to the development and use of the highest standards and practices for Kosher production, processing, and handling. Observe all rabbinical regulations pertaining to Kosher production, processing, and handling.

- Commit to the development and use of the highest standards and practices for Halal production, processing, and handling. Observe all regulations pertaining to Halal production, processing, and handling.
- When deemed necessary comply with HAACP regulations for production, processing, and handling.
- Commit to the development and use of the highest fair trade standards and practices. Observe all of code of ethics pertaining to fair trade regulations.

6. Ethical Standards

We want to be recognized as a company of high ethical standing. We will seek to identify and utilize Supplier Partners who aspire as individuals and in the conduct of all their business practices to a set of ethical standards not incompatible with our own.

The Code of Conduct guidelines establish SunOpta's expectation for conducting business in a manner that is consistent with our Value Statement and in compliance with laws and government regulations.

Supplier Partners must not engage in corrupt or unethical practices, such as paying bribes in exchange for jobs, preferential treatment, etc. Unauthorized sub-contracting is prohibited. Supplier Partners must only maintain one set of complete and accurate working-hour and payroll documents and records that represent true working conditions.

We do not support animal based laboratory testing by our Supplier Partners.

7. Traceability

To provide our customers with complete traceability, it is vital for us to have an open and transparent dialogue with our suppliers. We require that our suppliers have full traceability in their production of all materials originating from all sources.

Suppliers must be prepared to provide SunOpta with information about the presence of GMOs in all products and raw materials.

8. Working Hours

While permitting flexibility in scheduling, we will identify local legal limits on work hours and seek Supplier Partners who do not exceed them except for appropriately compensated overtime.

While it is understood that overtime is often required, supplier partners shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions. Employees should be allowed at least one day off in seven.

9. Wages and Benefits

We will only do business with supplier partners who provide wages and benefits that comply with any applicable laws and match the prevailing local industry practices. Our goal is to work with and encourage supplier partners who establish a living wage.

Wages are essential for meeting the basic needs of employees and reasonable savings and discretionary expenditure. Legally mandated benefits must be provided. Payment of wages should be in a timely manner and at a minimum on a monthly basis.

Workers shall be paid at least the local minimum wage or a wage that meets local industry standards, or which ever is greater. Hourly rates for overtime must be higher than the regular work shift. The Supplier Partner provides paid annual leave and holiday as required by law or which meet the local industry standard, which ever is greater.

Supplier Partners must record all employee working hours and deductions completely and accurately. Supplier Partners must not engage in practices designed to circumvent national or local wage, benefit or labor laws, such as

annually firing and rehiring workers, designating workers as probationary, etc.

10. General Labor Practices & Freedom of Association

We respect workers' rights to form and join organizations of their choice and to bargain collectively. We expect our suppliers to respect the right to free association and the right to organize and bargain collectively without unlawful interference. Supplier Partners must respect employee rights to freedom of association; they must not impose any punitive actions against workers in supporting union such as threatening, fining, suspending or firing workers exercising those rights. They should ensure that workers who make such decisions or participate in such organizations are not the object of discrimination or punitive disciplinary actions and that the representatives of such organizations have access to their members under conditions established either by local laws or mutual agreement between the employer and the worker organizations.

Any action that suppresses freedom of association is prohibited, and may be an act deemed illegal in some countries. Laws in different countries vary substantially regarding freedom of association. Most countries maintain procedural regulations on the actions of workers and employers. Some countries place substantial restrictions on workers' rights of association. The SunOpta Code of Conduct provision on free association neither permits, nor requires SunOpta or its Supplier Partners to engage in unlawful activities to protect the rights of association. Nevertheless, where the right to freedom of association and collective bargaining is restricted under law, the supplier should not hinder the development of lawful parallel means for independent free association and bargaining.

11. Discrimination

We believe the dignity, individuality and privacy of all people must be respected.

While we recognize and respect cultural differences, we believe that workers should be employed on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs. We will favor Supplier Partners who share this value.

We aim to employ people who reflect the diverse nature of society and we value people and their contribution irrespective of age, sex, disability, sexual orientation, race, color, religion, marital status, or ethnic origin. Discrimination against anyone for their membership or affiliation to any trade union or political party is prohibited. There is zero tolerance of any sexual, physical, or mental harassment.

12. Community Involvement

We will favor Supplier Partners who share our commitment to making ongoing positive social contribution to improving community conditions.

We encourage all Supplier Partners to contribute in their own way to such philanthropic endeavors as assisting the economically disadvantaged, promoting human rights and social justice, protecting the environment and fostering educational and cultural interests.

We endorse such service to local communities and the society at large. We are committed to leading the way through contributions to educational, charitable, and public service activities.

13. Health & Safety

We will only utilize Supplier Partners who provide workers with a safe and healthy work environment. Appropriate training shall be undertaken to ensure that employees understand the organization's health and safety policy.

Compliance with SunOpta's health and safety policies is required.

When a Supplier Partner has residential facilities for their employees, the housing must constitute a safe and healthy environment. All applicable laws and regulations should be followed that relate to health and safety, including: fire safety, sanitation, risk protection, electrical, mechanical, and structural safety.

14. Environment

Our goal is to do business with Supplier Partners who share our commitment to the environment and who conduct their business in a way that is consistent with SunOpta's Environmental Philosophy and Guiding Principles.

We encourage continuous improvement, responsible use of raw materials and natural resources, and operations designed to reduce activities that have a harmful impact on the environment. We would like to inspire our Supplier Partners in working for continuous improvement within this area and pollution prevention as well.

15. Privacy and Confidentiality

Supplier Partners must exercise care not to disclose nonpublic information regarding SunOpta or its operations. You must be sensitive to the kinds of information that constitutes SunOpta's confidential and proprietary information, sometimes referred to as trade secrets. Confidential and proprietary information is that which is not known or available to the public and which might adversely affect SunOpta's interests if it were disclosed.

This information may include, but is not limited to, product and business plans, personnel data, advertising or promotional programs, contractual terms and relationships, budgets, customer lists and sales forecasts.

In addition to protecting our own trade secrets and other confidential and proprietary information, it is our policy and practice to respect the trade secrets of others.

All Supplier Partners are expected to sign and comply with SunOpta's Nondisclosure Agreement (NDA).

16. Product Safety

We require that our Supplier Partners have documented product safety procedures in place and be compliant with CFIA and FDA regulations.

17. Management Systems

We encourage our Suppliers to implement documented management systems for quality, environment, health and safety. We believe documented management systems are the main tools to improve a company's performance in these areas.

