

Leaderfoods

LEADER FOODS – CODE OF CONDUCT

Leader Food's objective is to pursue long term profitable business in an ethical and responsible manner taking into account the universally recognized standards for the environment, human rights, labour, and anti-corruption. Therefore, we seek to ensure that all our employees, including directors and officers without exception, as well as Leader Food's suppliers operate in compliance with the standards of this Code of Conduct.

LEGAL COMPLIANCE

Leader Food's policy is to comply in all of its operations with the applicable laws and regulations, wherever it conducts its business. Therefore, Leader Foods, for its own part, and the supplier, for its own part, shall ensure that they as well as their employees comply with all applicable laws and regulations, wherever they conduct their business.

This Code of Conduct is not a substitute for nor should it be considered to override the applicable laws and regulations, but sets the minimum standards of behavior that is to be followed. To the extent Leader Foods or the supplier would be unable to comply with the Code of Conduct due to applicable mandatory laws and regulations, the spirit and the underlying meaning of this Code of Conduct shall nevertheless be adhered to.

BUSINESS CONDUCT

Leader Foods has zero tolerance towards bribery and corruption. Leader Foods, for its own part, and the supplier, for its own part, shall ensure that their directors, employees and third parties acting on their behalf do not offer, promise, give or accept any bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any other improper advantage. In particular, Leader Foods, for its own part, and the supplier, for its own part, shall not engage in any form of bribery or kickback scheme or otherwise offer any incentive to each other's employees in order to obtain any business.

Customary and reasonable business courtesies, including gifts and corporate hospitality (e.g. entertainment, business lunches and small gifts) are permitted, provided that they are always given in accordance and in compliance with applicable laws and regulations. However, neither Leader Foods nor the supplier should provide any business courtesies to each other's employees or their family members in any situation in which it might influence, or appear to influence, an employee's decision in relation to Leader Foods or the supplier. Any business courtesies must be reasonable both to their scope, value and frequency, and must reflect ordinary local business customs. Leader Foods and the supplier should avoid any interaction with the other's employees that may conflict, or appear to conflict, with that employee's duty to act in the best interest of its employer.

LABOR AND HUMAN RIGHTS

Leader Foods, for its own part, and the supplier, for its own part, shall comply with and respect the human rights in the spirit of the universally recognized standards.

Leader Foods and the supplier shall treat their employees in a fair and equal manner, and with dignity and respect, and shall ensure that their employees have a harassment-free working environment. Leader Foods and the supplier shall not discriminate in the hiring or promoting of employees whether based on



gender, age, religion, marital status, sexual orientation, political opinion, or national or ethnic origin, or other similar characteristic that does not relate to the qualifications or the requirements for the job. Neither Leader Foods nor the supplier shall use child or forced labor under any circumstances or contract with subcontractors or suppliers using such labor.

Leader Foods, for its own part, and the supplier, for its own part, shall ensure that compensation paid to its employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours and mandatory benefits.

Leader Foods, for its own part, and the supplier, for its own part, shall respect their employees' right to freely associate in compliance with all applicable laws and regulations.

HEALTH AND SAFETY

Leader Foods, for its own part, and the supplier, for its own part, shall provide their employees a safe and healthy working environment in compliance with all applicable laws and regulations. Leader Foods and the supplier shall ensure that their employees are provided with the appropriate health and safety information, training and equipment.

ENVIRONMENT

Leader Foods, for its own part, and the supplier, for its own part, shall make all reasonable efforts to protect the environment, and to keep the impact of their activities and products on the environment as low as possible, including but not limited to obtaining, maintaining and complying with all environmental permits, licenses and registrations necessary for their operations. Leader Foods, for its own part, and the supplier, for its own part, shall adhere to all applicable environmental laws and regulations.

SCOPE AND MONITORING

Leader Foods shall be liable to ensure that it and its employees operate in compliance with the standards of this Code of Conduct. Leader Foods also regularly monitors its and its employees' conformance with the standards of this Code of Conduct.

The supplier shall be liable to ensure that it and its employees operate in compliance with the standards of this Code of Conduct. The supplier shall also regularly monitor its and its employees' conformance with the standards of this Code of Conduct.

The supplier shall upon request provide Leader Foods access to all relevant information and documents needed to verify the supplier's conformance with the Code of Conduct. Should the supplier have, in the reasonable opinion of Leader Foods, materially violated this Code of Conduct, Leader Foods is entitled to terminate the business relationship.

By agreeing to work with Leader Foods the supplier confirms that it, its affiliates and their employees, including directors and officers, comply with this Code of Conduct. The supplier shall ensure that its suppliers and agents also comply with this Code of Conduct.

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Pasi Hautakorpi
CEO Leader Foods

