LAND O'LAKES, INC.

Supplier Code of Conduct

Land O'Lakes, Inc. holds itself to high ethical standards, and it expects the same from its suppliers and vendors.

In consideration for receiving business from Land O'Lakes, Suppliers are expected to comply with all local and national laws, regulations, rules and requirements with respect to all products and services that they manufacture, distribute or otherwise provide to Land O'Lakes or its subsidiaries and affiliates. If local or national law does not provide protections satisfactory to Land O'Lakes, we reserve the right to require Suppliers to meet higher standards. Land O'Lakes expects Suppliers will act ethically and in accordance with applicable laws in the following areas but note should be taken that these areas are not to be considered all inclusive but rather a guideline of expectations of Suppliers doing business with Land O'Lakes. This Code of Conduct is based in part on the principles outlined in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work. We expect all Suppliers to develop and implement appropriate internal business processes to ensure compliance with this Supplier Code of Conduct.

Food Safety

Supplier will supply food products or ingredients to Land O'Lakes that are safe for human consumption, pure, wholesome, unadulterated and in compliance with all applicable local and national laws.

Manufacturing

Supplier will ensure that its manufacturing processes are safe and environmentally responsible.

Forced Labor

Supplier will not use forced or involuntary labor, whether bonded, prison, military, compulsory or indentured labor, including debt servitude.

Child Labor

Supplier will not employ child labor, consistent with the principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, in supplying products or services to Land O'Lakes.

Abuse of Labor

Supplier will not physically abuse employees.

Freedom of Association and Collective Bargaining

Supplier will respect the principles of freedom of association and collective bargaining.

Discrimination and Harassment

Supplier must not permit unlawful discrimination or harassment of its employees.

Wages and Benefits

Supplier will provide workers with pay and benefits as required by law, including compliance with minimum wage and overtime requirements and will pay employees in a timely fashion.

Work Hours and Overtime

Supplier will set work schedules and overtime policies consistent with local and national law. Suppliers will abide by maximum hour and workweek laws.

Health and Safety

Supplier will provide workers with a safe, clean and healthy work environment and have an established plan for how to deal with emergency and crisis situations.

Environment

Supplier will comply with all applicable environmental laws.

Anti-Corruption

Supplier will comply with the United States Foreign Corrupt Practices Act, the United Kingdom's Anti-Bribery Act and all applicable laws of the relevant country related to anticorruption and bribery.

Treatment of Animals

Supplier will not tolerate animal cruelty, intentional abuse or neglect of any animal under its care.

Compliance

Supplier must demonstrate compliance with this Supplier Code of Conduct upon Land O'Lakes' request including, but not limited to, proof of written notification of this Supplier Code of Conduct to its employees.

Additional Agreements of Supplier

- Supplier agrees that Land O'Lakes may utilize, in its reasonable discretion, independent third
 parties to assess and audit Supplier compliance with this Code of Conduct. Supplier agrees to
 permit such inspections and to make employees and contract workers available to third-party
 auditors and not to discriminate or retaliate against workers for their comments to the auditors.
 While Land O'Lakes may choose to conduct investigations and audits referenced above, Land
 O'Lakes undertakes no duty to so monitor Suppliers operations.
- Supplier agrees that no third party beneficiary rights are intended or created by the existence of this Supplier Code of Conduct.
- Supplier agrees and acknowledges that if it fails to comply with any aspect of this Code of Conduct, it is expected to implement corrective actions. Land O'Lakes reserves the right to terminate any agreement with any Supplier that cannot demonstrate compliance with this Code of Conduct.

Questions or Concerns About This Supplier Code of Conduct

Supplier's questions or concerns regarding this Code of Conduct should be directed to Land O'Lakes Compliance and Ethics at the following email address: <u>landolakescompliance@landolakes.com</u>.