



Supplier Code of Conduct

Meijer is committed to always doing the right thing by conducting business in a responsible and ethical manner. We expect our business partners to do the same. Therefore, we have outlined our requirements in this Supplier Code of Conduct (Supplier Code). Within this Supplier Code, references to Suppliers includes direct and indirect suppliers of goods and services, contractors, and service providers of Meijer. We expect our Suppliers to comply with this Supplier Code. In addition, we expect our Suppliers to apply our Supplier Code to their direct and indirect business partners as we hold our Suppliers accountable for ensuring compliance with our Code.

Our Requirements:

- **Compliance with Laws**
 - Suppliers and their designated manufacturing facilities must comply with all applicable national and local legal standards and regulations.
 - Suppliers must comply with applicable United States Treasury or State Department sanctions with regard to employee and subcontractors.

- **Labor**
 - Child and Forced Labor - Child and forced labor will not be tolerated. Suppliers shall fully comply with applicable employment laws, and, in the absence of applicable laws, international treaty. However, in each case, we will not permit workers under age 16.
 - Hazardous Work - Suppliers must protect workers in hazardous conditions. The minimum age of employment must be set at 18 in what is often known as the “3D”, dirty, difficult, and dangerous, jobs, or other age restricted activities.
 - Disciplinary Measures - Suppliers must treat their employees with dignity and respect. There shall be no tolerance for the use of corporal punishment, mental, physical, or verbal abuse.
 - Working Hours - Workers shall not be required to work more than the legally prescribed limits. Production facilities shall comply with applicable laws that entitle workers to vacation time, leave periods and holidays.
 - Freedom of Association - Workers’ rights of free association shall be respected and not restricted or interfered in. The workers exercising those rights shall not have fear of reprisal, retaliation, intimidation, or harassment.

- Compensation - Suppliers shall compensate their workers through wages which shall include overtime pay and benefits which satisfy all applicable laws and regulations. Minimum wages shall be established in the country of origin in conjunction with local law. In the case where workers are compensated by piece rate labor, these wages must equal or exceed minimum wage.

- **Human Rights**

- Health and Safety - Suppliers shall provide workers with a safe, clean and healthy working environment. Supplier is accountable to ensure that preventative measures are in place to avoid accidents and prevent injuries.
- Discrimination - Suppliers shall hire, compensate, promote and otherwise manage their employees based solely on the worker's ability to perform the job. Discrimination is prohibited based on legally protected criteria, gender, sexual orientation, race, age, disability, nationality or cultural beliefs.

- **Ethical Behavior**

- Gifts and Entertainment - Suppliers are expected to be committed to fair and competitive relationships with Meijer. Suppliers must avoid any actions that would create a perception that favorable treatment was provided in exchange for a business courtesy.
- Conflicts of Interest - Suppliers must disclose to Meijer any situation that may appear as a conflict of interest. Typical areas where a conflict of interest may arise include employment of friends or relatives or where a pre-existing business relationship exists.
- Anti-Corruption - Suppliers are expected to adhere to high ethical standards. Bribery, extortion, or any kind of corrupt payments, including facilitation payments are not allowed.

- **Audit**

- Suppliers must anticipate the administration of compliance due diligence by Meijer, such as third-party audits, and documentation requests, at the expense of the Supplier.

- **Environment**

- Suppliers are expected to adhere to all local laws protecting the environment and have an effective environmental policy. The key pillars should include a

precautionary approach to environmental matters with sound procedures in place to manage chemical and hazardous materials, wastewater, solid waste and air emissions, and to minimize waste and maximize recycling efforts.

- **Grievance Mechanism**

- Suppliers must provide workers with access to a grievance mechanism in the local language and prohibit any retaliation for reporting.

Reporting Concerns to Meijer:

Promptly report any non-compliance with the Supplier Code by calling or emailing the Meijer Corporate Compliance Team or Meijer Legal Department. Another option is the [Meijer Hotline](#) which allows you to submit a confidential report and remain anonymous. Retaliation for reporting is strictly prohibited.

Meijer Corporate Compliance Team (616) 791-2767 | Responsible.Sourcing@Meijer.com

Meijer Legal Department (616) 735-8305

[Meijer Hotline](#) 1-888-691-0779