

ROLAND FOODS, LLC
AMERICAN ROLAND FOOD CORPORATION
SUPPLIER CODE OF CONDUCT

February 1, 2015

Suppliers are expected to comply with all local and national laws, regulations, rules and requirements with respect to all products that they manufacture, distribute or otherwise provide to Roland Foods, LLC, American Roland Food Corporation and/or their affiliated entities. If local or national laws do not provide protections satisfactory to us, we reserve the right to require Suppliers to meet higher standards. We expect Suppliers to act ethically and in accordance with applicable laws, particularly in the following areas:

Food Safety. Supplier will supply food products to us that are safe for human consumption, pure, wholesome, and unadulterated and in compliance with all applicable local and national laws.

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 to us.

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 laws. Supplier will abide by maximum hour and workweek laws.

Health and Safety. Supplier will provide workers with a safe, clean and healthy work environment.

Environment. Supplier will comply with all applicable environmental laws.

Anti-Corruption. Supplier will comply with the United States Foreign Corrupt Practices Act and all applicable laws related to anticorruption and bribery.

Compliance. Supplier must demonstrate compliance with this Code of Conduct upon our request.

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 Code of Conduct.

We may utilize independent third parties to assess Supplier compliance with this Code of Conduct. These assessments may include confidential interviews with employees and contract workers. Supplier agrees to permit such inspections, to make employees and contract workers available to third-party auditors, and not to discriminate or retaliate against workers for comments made to such auditors.

If a Supplier fails to comply with any aspect of this Code of Conduct, it is expected to implement corrective actions. We reserve the right to terminate any agreement with any Supplier that cannot demonstrate compliance with this Code of Conduct.

The provisions of this Code are in addition to, and not in lieu of, the provisions of any purchase order or other agreement between a Supplier and American Roland Food Corporation, Roland Foods, LLC, and/or any of their affiliates.