



Supplier Code of Conduct

About the Code

Guided by core values of integrity, excellence and responsibility, Federated Co-operatives Limited (FCL) is committed to making ethical business decisions, and we expect our suppliers to share that commitment. FCL has developed this Supplier Code of Conduct (“Code”) to define the standards which we are holding our suppliers to in this regard. The Code is applicable to those that provide FCL goods and services whether directly or indirectly (“Suppliers”).

In this Code, “FCL” includes FCL-owned and FCL-managed legal entities including the Co-op Refinery Complex (CRC), Co-op Ethanol Complex (CEC), and Interprovincial Cooperative Limited (IPCO).

Application and Acceptance

When entering a contract to supply goods or services to FCL, whether it is through a contract, sub-contract, a purchase order or by an approved quote, the Supplier is affirming their acceptance to comply with the requirements set out in the Code. It is the Supplier’s responsibility to ensure that their respective supply chain is in compliance with this Code. If you are not in compliance with this Code, it is your responsibility to notify your FCL contact.

If a Supplier fails to comply with the Code, FCL reserves the right to investigate potential instances of non-compliance, the right to take corrective action, and the right to terminate the Supplier relationship.

Anyone who believes that a Supplier has engaged in illegal, unethical, or otherwise improper conduct, or conducted any other activity in violation of this Code is encouraged to report such conduct using the FCL ethics hotline (1-866-529-9589).

Business Conduct

Laws and Regulations

Suppliers must comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations in the jurisdictions in which they operate.

Gifts and Entertainment

Suppliers may not provide FCL employees any gift or entertainment that could create a sense of obligation or otherwise improperly influence a business decision.



Confidentiality

Suppliers must comply with all confidentiality requirements as set out in the applicable supply agreement with FCL.

Information Security

Suppliers are responsible for securing their network and computing systems against unauthorized access and/or abuse that may result in unauthorized access to personal or confidential information.

Employment Standards

At a minimum, FCL expects its Suppliers to meet the following terms and conditions of employment:

Compliance with Employment Laws

Suppliers must comply with all labour and employment laws in the jurisdictions in which they operate including but not limited to minimum wages, working hours, employment conditions, hiring and firing, right to association, and use of foreign and migrant workers.

FCL expects its Suppliers to recognize their employees' right to freedom of association, and the rights to collective bargaining and to form and join trade unions in the jurisdictions in which they operate.

Forced and Child Labour

Suppliers are not to engage in any form of involuntary labour practices, including forced, bonded, trafficked, involuntary prison or underage labour. FCL will not accept products from Suppliers directly or indirectly participate in any form of forced labour, compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

Suppliers must not employ persons below the minimum age permitted by local law and the core conventions of the International Labour Organization (ILO) defined in the Minimum Age for Admission to Employment Convention 1973, adopted in Geneva on June 26, 1973. In no circumstances will Suppliers engage in the "worst forms of child labor" as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. Where local laws impose less restrictive obligations, FCL expects the Suppliers to adhere to the applicable ILO Convention.

Suppliers are required to inform FCL of any instances of forced labour or child labour within their operations or supply chain.



Discrimination/Human Rights

FCL recognizes that cultural differences exist, and different standards apply in various jurisdictions; however, we believe that all terms and conditions of employment should be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. FCL favors Suppliers who have a social and political commitment to basic principles of human rights and who do not discriminate against their employees in hiring practices or any other term or condition of work, on the basis of race, color, national origin, gender, sexual orientation, religion, disability, or other similar factors.

Health and Safety

Suppliers are expected to meet or exceed all regulatory health and safety requirements in the jurisdictions in which they operate.

Suppliers are expected to maintain a safe and hygienic working environment for employees. Suppliers are to ensure their facilities do not pose hazards to employees, and are equipped with first aid and emergency care, functional safeguards against fire, and emergency evacuation routes. Employees should receive training to perform their jobs safely. Employees are to be provided personal protective equipment, potable water, and sanitary washrooms. FCL will not do business with any Supplier that provides an unhealthy or hazardous work environment, or which utilizes mental or physical disciplinary practices.

Environmental Responsibility

Suppliers are expected to meet or exceed all regulatory environmental and waste management requirements in the jurisdictions in which they operate.

At FCL, we are committed to building sustainable communities together, focusing on circular economy, climate transition and responsible sourcing. We encourage our Suppliers to address and minimize environmental impacts material to their business. This includes, but is not limited to greenhouse gas emissions, water use, hazardous and non-hazardous waste, minimizing unnecessary product packaging, resource management and biodiversity.

Animal Welfare

Suppliers and their livestock producers are expected to treat animals in accordance with requirements in the jurisdictions in which they operate, or industry-accepted guidelines for humane treatment, whichever is more stringent.

All Suppliers and their livestock producers are expected to follow recognized standards for the care and handling of animals used for food production. FCL supports NFACC and their developed Codes of Practice as acceptable animal welfare and handling practices.



Any implemented animal care assessment programs must include a third-party validation component with the goal of providing assurance to the industry, customers and consumers that animal care standards/codes of practice are being observed.

Seafood Sustainability

Suppliers are to adhere to FCL's Sustainable Seafood Policy found on fcl.crs.

Continuous Improvement

Suppliers are encouraged to continually improve their business practices, sustainability efforts and ethical standards. FCL may collaborate with Suppliers on programs that support improvement and innovation.

By working with FCL, Suppliers acknowledge their commitment to adhere to this Supplier Code of Conduct.