



# The Giorgi Companies, Inc. CODE OF CONDUCT FOR SUPPLIERS



# The Giorgi Companies Expectations of Suppliers

## Code of Conduct

**This Code of Conduct for Suppliers sets forth the requirements of The Giorgi Family of Companies for the conduct of its Suppliers. The Giorgi Family of Companies is committed to these requirements, and we expect our Suppliers to either have comparable policies, or to adopt this Code. We also expect our suppliers to apply these principles to their suppliers.**

**FOOD SAFETY:** At the Giorgi Family of Companies, there is nothing more important than protecting the health and safety of those who use and consume our products. We follow very specific processes to ensure our products meet rigorous food safety and good manufacturing standards. We likewise expect our suppliers (and their suppliers) to do the same. We also expect all suppliers to label their products accurately and to take appropriate action if they become aware of anything that suggests that a product, process, or situation may pose a danger to health and safety.

**HUMAN RIGHTS AND LABOR:** At The Giorgi Family of Companies, our employees are our greatest asset. Our commitment to integrity begins with complying with all applicable laws, rules, and regulations regarding human rights and labor. We likewise expect our suppliers (and their suppliers) to treat their employees fairly, by complying with all applicable laws, rules and regulations regarding human rights and labor in their business operations. These standards include:

- Ensuring that all employees and agents may freely choose their employment, with no forced or compulsory labor.
- Ensuring compliance with all applicable child labor laws.
- Ensuring compliance with all applicable laws regarding work hours, overtime, wages, and benefits.
- Ensuring compliance with all applicable laws regarding treatment of employees. In addition, suppliers shall not subject employees and prospective employees to harsh or inhumane treatment, and shall not subject employees and prospective employees to any sexual harassment or discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status.
- Ensuring that all employees have the right to associate freely, join or not join labor unions, seek representation and have a voice regarding working conditions without fear of retaliation.



**ENVIRONMENTAL, HEALTH AND SAFETY:**

The Giorgi Family of Companies is committed to compliance with all applicable laws and regulations concerning the environment, health, and safety. A safe and healthy work environment enhances the quality of products and services and leads to a more productive company. We likewise expect the same commitment from our suppliers (and their suppliers), including:

- Ensuring compliance with all applicable environmental laws and regulations.
- Ensuring compliance with all applicable worker and workplace safety laws and regulations.
- Ensuring that a safe and environmentally friendly workplace is provided for all employees.
- Ensuring that management systems are in place to prevent, track and report occupational injury and illness.

**SAFEGUARD PROPRIETARY INFORMATION:** The protection of our confidential information and trade secrets is vital to the interest and success of The Giorgi Family of Companies. We also protect the confidential information and trade secrets of our suppliers, and we likewise expect our suppliers (and their suppliers) to protect our confidential information and trade secrets as well.

**MANAGEMENT, ETHICS AND LEGAL COMPLIANCE:** The Giorgi Family of Companies conducts its business ethically and in compliance with the law, and likewise expects its suppliers (and their suppliers) to do the same.

- Suppliers must avoid any interaction with employees of The Giorgi Family of Companies that may conflict or appear to conflict with the ability of those employees to act in the best interest of The Giorgi Family of Companies.
- Suppliers must not engage in any forms of bribery to obtain or retain business from the Giorgi Family of Companies, and must comply with the all applicable laws dealing with the prevention of bribery including the US Foreign Corrupt Practices Act.
- Suppliers must comply with all antitrust, fair competition laws and trade compliance laws.
- Suppliers should have a management system in place that will ensure (a) compliance with applicable laws, regulations; and (b) application of the same requirements and expectations to their suppliers.

**NO RETALIATION:** The Giorgi Family of Companies does not tolerate retaliation. We likewise require that suppliers (and their suppliers) have programs in place to ensure the protection of employees and others who report improper conduct of employees, customers, or suppliers.

**SLAVERY AND HUMAN TRAFFICKING:** As part of The Giorgi Family of Companies' efforts to comply with the California Transparency in Supply Chains act of 2010, and consistent with the policies set forth above, The Giorgi Family of Companies requires all of its suppliers to comply with all laws regarding slavery and human trafficking. To that end, The Giorgi Family of Companies may require periodic supplier certification of such compliance, and may also require that its suppliers implement such other reasonable actions as may be appropriate to ensure compliance with these laws.

**RIGHT TO AUDIT:** The Giorgi Family of Companies reserves the right to request periodic audits, or request the results of audits conducted by others, of a supplier's good manufacturing practices, food safety compliance, or to ensure compliance with this Code.

## **The Giorgi Companies, Inc.**

108 Plaza Drive, Suite 200

Blandon, PA 19510

Phone: 610-926-2139

Fax: 610-926-7012