



# ANTI-FORCED LABOR POLICY

## I. PURPOSE

Good Foods Group, LLC. (collectively referred to as the “Company”) and all directors, officers, team members, agents, contractors, vendors, subcontractors, and suppliers of the Company shall respect and honor human rights in all our operations and facilities. This Policy is guided by the principles of the International Labor Organization (ILO) conventions and national laws and outlines the Company’s stance regarding forced labor.

## II. BACKGROUND

According to ILO data, forced labor can be found in every country and every sector. They estimate there are approximately <sup>1</sup>27.6 million victims of forced labor worldwide, including 17.3 million in the private economy.

Forced or compulsory labor shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily. Forced labor is the most common element of modern slavery and is the most extreme form of people exploitation. This happens in the context of poverty, lack of sustainable jobs and education, as well as a weak rule of law, corruption, and an economy dependent on cheap labor.

Child labor refers to the exploitation of children through any form of work that deprives children of their childhood, interferes with their ability to attend regular school, and is mentally, physically, socially, or morally harmful.

Good Foods Group, LLC., has two (2) locations. The first location is in Pleasant Prairie, WI with approximately 380 team members, the second location is in Tacambaro, Michoacan, Mexico, with approximately 600 team members. We believe in providing high-quality products using the freshest ingredients, and as such, has a responsibility to conduct all business in an ethical manner with integrity. Our [Business Ethics and Code of Conduct Policy](#) outlines a standard of ethical conduct that we expect all Good Foods team members to follow in our operations and wherever the Company does business.

The Company does not condone or permit the use of child, forced, indentured or involuntary labor in any of our operations.

In addition, the Company supports the fundamental principles of the [UN Universal Declaration of Human Rights](#) endorsed by the Human Rights Council in 2011, the [International Labor Organization \(ILO\) Declaration](#) on Fundamental Principles and Rights at Work, and the [OECD Guidelines for Multinational Enterprises](#).

## III. POLICY

Company commits to:

- Providing a work environment free of unlawful discrimination and harassment based on any

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<sup>1</sup> <https://www.ilo.org/topics/forced-labour-modern-slavery-and-human-trafficking/data-and-research-forced-labour>



status such as race, color, creed, religion, sex, gender, national origin, age or any other status or activity protected by applicable law.

- Rejecting forced labor and child labor and working to ensure that our operations are free from these practices. We do not condone the use of child, forced, bonded, indentured, or involuntary labor of any kind within our operations. Good Foods defines “child” as less than 16 years of age or 18 years of age for hazardous work.
  - **Occasional work:** Sometimes, parents may bring their children to work (“Bring your child to work day”) to teach them skills and introduce them to a work environment. They may also hand them some tasks to complete (ex. File a few papers, organize file folders, etc.). This is an acceptable practice, if it doesn’t deprive children of school on a consistent basis or puts them in any danger.
- Promoting the health and safety of our workers everywhere.
- Conducting recruitment of team members in a manner that follows this policy.
- Ensuring compliance with fair wage and hour laws in all our operations and respecting the principles of the [International Covenant on Economic, Social and Cultural Rights](#).
- Working to ensure there is no forced labor involved within our supply chain.
- Select suppliers that agree to follow this policy, not knowingly conduct business with any supplier or other business partner who violates these standards and will engage in appropriate measures including the termination of any business dealings if any such material violations are found to exist.
- Respecting the rights of people in communities impacted by our activities and taking appropriate steps to avoid, minimize and/or mitigate any adverse impacts to Human Rights.
- Requiring our consultants, suppliers, agents, and business partners who conduct work on our behalf to uphold similar values and principles.
- Providing a complaint mechanism for all team members, individuals, and communities to report any concerns relating to forced labor and child labor within our operations or the communities where we conduct business.

#### IV. SUPPLY CHAINS

Our supply chain is primarily focused on the sourcing, warehousing, and transporting of raw materials, ingredients, and packaging required to manufacture our products. All suppliers of raw materials, ingredients and packaging are required to demonstrate a clear commitment to protecting the rights of workers. Specifically, suppliers are required to adhere and certify their compliance to our [Supplier Code of Conduct](#).

#### V. INTERNAL ACCOUNTABILITY

The Company is committed to ensuring that there is no slavery or human trafficking in any part of our business, including our supply chain. Each team member is expected to conduct business legally and ethically and comply with certain established company standards, including but not limited to the prohibition of forced labor and the employment of anyone under the ages defined in the “Policy” section above.

#### VI. TRAINING

The most recent [Business Ethics and Code of Conduct Policy](#) is accessible to all team members. The Company utilized Alchemy to train all team members on various components of the policy, meaning the focus of the trainings were established based on the employee’s position within the Company.

#### VII. VIOLATIONS

Any officer, director or team member of the Company who violates forced labor laws or this Policy will



be subject to disciplinary action, up to and including termination of employment. The contracts of any director, agent, representative, or joint venture partner of the Company may be terminated for cause if the director, agent, representative or joint venture partner violates any forced labor laws or this Policy.

The Company may actively seek to recoup any losses that it incurs as a result of a violation of any of these laws or this Policy from the individual or entity that carried out the prohibited conduct. The Company will not reimburse any fines or penalties for violations of forced labor laws except where required by law or contract and permissible by law.

**VIII. REPORTING VIOLATIONS**

If a team member suspects or believes that a violation of this Policy has occurred, the team member should immediately report it via one of the following methods:

- A. This website provides a quick and simple reporting process, in the team member’s local language.
  - Website reporting: [www.peiasap.com/hotline/](http://www.peiasap.com/hotline/)
  - Client Code: GOODFOODS
- B. Call the Ethics Hotline in the USA:
  - 1-800-426-7147
- C. Email the complaint department in MEXICO:
  - [quejasymdenuncias@goodfoods.com](mailto:quejasymdenuncias@goodfoods.com)

The Company provides the following avenue for external individuals and our communities to report any concerns they may have regarding this Policy:

- A. <https://www.goodfoods.com/consumer/>

**IX. MILESTONES**

Progress 2023 –

- 2023
  - Developed initial Draft of the Supplier Code of Conduct
- 2024
  - Introduced Good Foods Group, LLC. Business Ethics & Code of Conduct Policy and trained all team members
  - Developed “Anti-Forced Labor” policy

**REVISIONS**

Date	Revisions Made	Author
5.28.2024	Introduction of Policy	Dawn Girty, PHR, Director of HR