



**Del Monte Foods**  
*Growers of Good®*

## **Del Monte Foods Supplier Code of Conduct**

At Del Monte Foods Corporation II Inc. (Del Monte Foods), our mission is to nourish families with earth's goodness. We're passionate about bringing high-quality, healthy, and nutritious foods in a way that protects the environment, benefits the communities in which we live and do business, and enables our Company to grow and flourish. As a leader in quality, service, and in ethical and honest business practices, we look to our suppliers to also practice and uphold ethical business standards. This Supplier Code of Conduct, while not exhaustive, is established to provide a guideline of expectations, highlighting some key laws and regulations, as well as outlining additional requirements that Del Monte Foods expects its suppliers to meet. Suppliers should take reasonable measures to confirm that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct. Del Monte Foods may update this Code of Conduct from time to time and will advise suppliers of any changes.

### **Scope**

This Code applies to Del Monte Foods' direct and indirect suppliers, brokers, co-manufacturers/co-packers, re-packers, warehouses, distributors and licensees in all categories, including their parent, subsidiary, or affiliate entities. Any reference to employee(s) shall be deemed to include temporary labor used or retained. Suppliers are expected to adhere to this Code and are responsible for ensuring their practices are consistent with the requirements stated. Del Monte Foods' standard purchase order includes terms requiring each supplier to acknowledge it has reviewed the contents of this Code and agree to comply with the provisions contained therein.

### **Compliance with the laws**

Suppliers that produce or sell goods or provide services to Del Monte Foods shall operate in full compliance with all applicable national and local laws, rules, and regulations, including those relating to labor, worker health and safety, and the environment. Where applicable, Suppliers must comply with relevant international laws such as those related to international trade (including export controls, sanctions, and reporting obligations) data protection and data transfer rules, and anti-trust competition laws. We are committed to the ethical use of artificial intelligence. We expect our suppliers to review and support the U.S. Department of Defense Ethical Artificial Intelligence Principles when developing or using artificial intelligence solutions on our behalf.

### **Human and Workplace Rights**

Del Monte Foods supports corporate responsibility to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, which states that business enterprises should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. The responsibility of business enterprises to respect human rights refers to internationally recognized human rights — understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Suppliers must avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur and

seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts. Del Monte Foods expects compliance with relevant human rights policies throughout our supply chain, including:

### **Respect**

Suppliers shall treat all workers with dignity and respect. Suppliers shall recognize the right to a workplace free of harassment and shall not engage in or permit corporal punishment or any other form of physical or psychological coercion including threats of violence or sexual harassment.

### **Voluntary Labor**

Del Monte Foods subscribes to the International Labour Organization definition of “forced or compulsory labor” as 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 voluntarily (ILO Convention No. 29, Article 2, para. 2). Suppliers must ensure that no forced labor, including bonded, indentured and involuntary prison labor, is used. We prohibit assessment of recruitment or other fees by Del Monte Foods’ suppliers, and surrendering of identification, as a condition of employment. Any fees incurred by Del Monte Foods’ suppliers when using employment agencies in the hiring or recruiting of workers must be paid by Del Monte Foods’ suppliers and such fees cannot later be assessed against workers. Only voluntary employment may be utilized, and workers must be allowed to terminate employment at any time upon reasonable notice. Suppliers are forbidden from using forced, bonded, prison, or indentured labor of any kind.

### **No Child Labor**

Del Monte Foods’ suppliers and their subcontractors are forbidden from using child labor in any circumstance. The term “child” refers to any person employed under the age of 15 (or 14 where the applicable laws permit). Del Monte Foods’ suppliers must ensure proper employment of minors at all stages of farming, manufacturing, delivering, and processing of the finished goods. Del Monte Foods does support the use of legitimate workplace apprenticeship programs, but only if they comply with all applicable laws and regulations.

### **Discrimination**

All terms and conditions of employment, including but not limited to, hiring, pay, promotion, and termination must be based on an individual’s ability and willingness to do the job. Suppliers must not discriminate in hiring and employment practices based on race, color, gender, gender identity, nationality, religion, age, sexual orientation, social or ethnic origin, disability, maternity, marital status, political affiliation or union membership.

### **Working Hours**

Suppliers shall comply with all applicable laws, regulations and industry standards governing the number of maximum work hours, vacation time, leave periods, and holiday. Overtime shall be used only when each employee is fully compensated according to local law.

### **Compensation and Benefits**

Suppliers must compensate all workers with wages, overtime premiums, and benefits that meet or exceed local legal standards, local industry standards, or collective agreements, whichever are higher. Suppliers are encouraged to provide wages and benefits that are sufficient to meet workers’ basic needs and provide some discretionary income for workers and their families.

### **Freedom of Association and the Right to Collective Bargaining**

Suppliers must respect the right of workers to choose to lawfully and peacefully associate, organize or bargain collectively. Suppliers shall not threaten, restrict or interfere with workers’ lawful efforts to join associations of their choosing or to bargain collectively.

### **Health and Safety**

Suppliers must provide workers with a safe and healthy work environment. Suppliers must take proactive measures to reduce work-related injury and illness and promote the general health of employees.

## Environment

Suppliers will act in an environmentally and socially responsible manner. At a minimum, this means suppliers who are in compliance with applicable laws and regulations, and who have the commitment as well as the ability to remediate any problems they may cause. Del Monte Foods is committed to the following and expects the same of its suppliers: reducing environmental impacts such as deforestation, greenhouse gas emissions, and waste generation; protecting water resources through restorative or conservation efforts; supporting social needs in the communities in which it operates through philanthropic investment, diversity and inclusion, human rights practices; and supporting sustainability and traceability efforts of goods and services throughout the supply chain, including agriculture.

### No-Deforestation

Del Monte Foods recognizes the unique environmental and social risks associated with the sourcing of agricultural products. These risks require additional due diligence in sourcing, education and training to ensure the products in our supply chain are not associated with deforestation or plantation expansion on carbon-rich peatlands.

While Del Monte Foods is a minor user of primary deforestation linked commodities (defined as: [palm oil, soy, cattle, plantation wood fiber, cocoa, coffee, and plantation rubber](#)), we realize that responsible sourcing of even the smallest amount of these ingredients makes a difference. Therefore, Del Monte Foods will prioritize purchasing deforestation linked commodities from suppliers who comply with our Deforestation Policy.

## Product Quality and Safety

Suppliers must ensure high-quality and safe products through appropriate measures of quality control. All ingredients and products must be produced following the highest standards of sanitation in compliance with company and governmental requirements and laws.

## Business Integrity

Suppliers shall conduct business in accordance with the highest standards of ethical behavior and in accordance with all applicable laws and regulations in the countries where materials are sourced or services are delivered.

### Anti-Bribery and Corruption

Suppliers must not tolerate, permit, or engage in bribery, corruption, or unethical practices whether in dealings with public officials or individuals in the private sector. Supplier agrees that it will not make or promise to make payments of money or anything of value, directly or indirectly, to any government or public international organization officials, political parties, or candidates for political office, for the purpose of obtaining or retaining business or securing any improper advantage. Supplier shall comply with all applicable anti-corruption laws of the countries in which it does business and with the U.S. Foreign Corrupt Practices Act.

### Documentation and Inspection

Suppliers must maintain necessary documentation to demonstrate compliance with this Code of Conduct and required laws and make these documents available to Del Monte Foods upon request. Suppliers agree to submit to inspections with or without prior notice.

### Compliance

As a condition of doing business with Del Monte Foods, Suppliers must comply with this Code of Conduct. If Del Monte Foods determines that any Supplier has violated this Code, Del Monte may at its discretion either terminate its business relationship and/or require the Supplier to implement a corrective action plan. Suppliers concerned about potential violations of this Code of Conduct for Suppliers should report them to [legalteam@delmonte.com](mailto:legalteam@delmonte.com)