



MICHIGAN MILK PRODUCERS ASSOCIATION

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CODE OF CONDUCT

Michigan Milk Producers Association (MMPA) is committed to protecting the working rights and safety of our employees and all of those involved in providing us products and supplies. We conduct business with the following:

PROHIBITION OF CHILD LABOR

The use of child labor is prohibited. Any forms of exploration of children is forbidden. Mandatory compliance with international standards and applicable country of origin laws and regulations regarding child labor is required.

PROHIBITION OF FORCED, SLAVE OR COMPULSORY LABOR AND HUMAN TRAFFICKING

All forms of forced labor, slavery and human trafficking are forbidden. Mandatory compliance with international standards and applicable country of origin laws and regulations regarding forced labor is required.

WORKING HOURS AND COMPENSATION

Normal working hours, wages and overtime (when necessary) will follow applicable laws in local and national country of origin.

HEALTH AND SAFETY

We strive to make safety the foundation for all operations and employee involvement. MMPA is committed to taking a progressive approach to an incident-free culture, designing and improving our sites with a safety-minded stance, developing and maintaining effective safety programs while holding employees responsible for support and success and using commonly accepted safety and health practices while following all company, state and federal laws.

ABUSE AND DISCRIMINATION

Employees are treated with respect and not subjected to abuse, unusual disciplinary actions or discrimination in hiring practices according to the laws of the country in which they conduct business.

Finally, please be aware that a confidential Ethics Line is available and can be accessed at www.RedFlagReporting.com or call 1-877-647-3335 (client code: Mimilk). This tool is in multiple languages. Reports can be made anonymously or confidentially to raise concerns about improper or illegal conduct, including violations of our Code of Conduct. It is also available for reports of misconduct by MMPA employees. We encourage you to use this tool to help us maintain our high standards.

CODE OF ETHICS

MMPA strongly supports and promotes ethical conduct in its business practices and relationships. We acknowledge our duty to affirm and promote ethical conduct by adoption of the following Code of Ethics. This Code of Ethics shall apply to all MMPA management and employees, trustees of MMPA's Pension and Deferred Compensation Plans, members of the board of directors and members of MMPA committees and locals that may recommend, develop or act on various business policies and practices.

Accordingly, we agree we will:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- Conduct business with integrity and do not tolerate bribery, corruption, fraud or any unethical business practices.
- Provide constituents with information that is accurate, complete, objective, relevant, timely and understandable.
- Comply with rules and regulations of federal, state, and local governments, and other appropriate private and public regulatory agencies.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated.
- Respect the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of one's work will not be used for personal advantage.
- Share knowledge and maintain skills important and relevant to constituents' needs.
- Proactively promote ethical behavior as a responsible partner among peers, in the work environment and the community.
- Achieve responsible use of and control over all assets and resources employed or entrusted.

HUMAN RIGHTS POLICY

Respect for human rights is a fundamental value of MMPA. We are committed to supporting, respecting and protecting human rights in our relationships with our employees, suppliers and business partners.

This policy is guided by the United Nations Guiding Principles on Business and Human Rights.

CHILD LABOR

The use of child labor is prohibited. MMPA prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

FORCED LABOR

All forms of forced labor, slavery and human trafficking are forbidden. Mandatory compliance with international standards and applicable country of origin laws and regulations regarding forced labor is required.

FAIR COMPENSATION

MMPA compensates employees equitably and competitively relative to the industry and labor market and in accordance with applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefit laws.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith.

HEALTH AND SAFETY

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WORKPLACE SECURITY

MMPA prohibits violence, harassment, intimidation and other unsafe or disruptive conditions due to internal or external threats.

ANTI-DISCRIMINATION AND HARASSMENT

We are committed to a work environment free from discrimination, harassment and retaliation, and to providing equal employment opportunities to all applicants and employees regardless of race, color, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability or military status.

Provide reasonable accommodations to a qualified employee or applicant with a disability, to a pregnant employee or applicant, or to an employee or applicant for their sincerely held religious beliefs or practices, where the reasonable accommodation would enable the employee or applicant to perform the essential functions of their job or to have an equal opportunity to be considered for a job.

DIVERSITY AND INCLUSION

MMPA is committed to being a high-performing organization built on the foundation of a diverse and inclusive workforce, with individuals and teams working to blend a wide range of talents, preferences and perspectives in pursuit of shared purposes. Employees are expected to be open to dialogue and tolerant of other's differences and participate in open and honest communication as well as assuming the positive intent of others.

GUIDANCE AND REPORTING

Anyone can report a human rights concern through the options below:

- Management
- Human Resources
- Ethics Hotline

www.RedFlagReporting.com

1-877-647-3335 (client code: Mimilk).

This tool is in multiple languages. Reports can be made anonymously or confidentially.

ETHICAL TRADING INITIATIVE BASE CODE

MMPA complies with the principles of internationally recognized labor practice set out in the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is founded on the conventions of the International Labour Organisation and is viewed as a global reference standard for good labor practice.

MMPA adheres to the ETI's Base Code's nine criterion:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labor shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.

The full ETI base code can be accessed online, at <https://www.ethicaltrade.org/eti-base-code>.