



ROGERS SUGAR INC. / LANTIC INC.

THE MAPLE TREAT CORPORATION / HIGHLAND SUGARWORKS INC.

ETHICAL AND SUSTAINABLE SOURCING SUPPLIER CODE OF CONDUCT

1.0 Purpose

Lantic Inc. and its affiliates (collectively “Lantic”) are committed to upholding human rights, not only with respect to its own employees but also for all employees in its supply chain. Lantic requires all of its suppliers (suppliers, contractors, agents, and consultants) to adhere to business ethics and comply, at a minimum, with all applicable labour, employment, health and safety, and environmental laws and regulations of the country where the goods are produced and demonstrate high standards of ethical business behaviour. We require that all of our suppliers read, understand and apply this Code of Conduct in their businesses and encourage them to be innovative and find ways to exceed these minimum requirements.

2.0 Scope

This Supplier Code of Conduct applies to all direct and indirect suppliers of Lantic Inc. and its affiliates.

3.0 Governance

Oversight of the environmental, social and governance (“ESG”) matters reflected in this Supplier Code of Conduct is through the ESG Committee of the Board of Directors and the Lantic Inc. executive leadership team. The ESG Committee of the Board of Directors is briefed on ESG issues on a quarterly basis.

Our Corporate Sustainability Team works closely with our sourcing teams to implement programs, establish guidelines and provide guidance on issues that impact human rights and the environment. The Corporate Sustainability Team also coordinates the annual review of this Supplier Code of Conduct.

4.0 Supplier Code of Conduct

4.1 Compliance with the Law

Suppliers shall comply with all laws and regulations applicable to their business in the jurisdiction in which they operate, including but not limited to local, provincial, federal or industry specific laws and regulations (“Applicable Laws”). All other applicable international laws and regulations shall be complied with, including those relating to international trade, data protection and competition laws.

4.2 Anti-bribery and Corruption

Suppliers shall comply with all Applicable Laws governing anti-corruption and anti-bribery, including, but not limited to, paying or accepting bribes or kickbacks, extortion, fraud, money laundering, or engaging in other similar unethical behavior.

4.3 Conflicts of Interest

All and any conflict of interest in any business dealings with Lantic, of which the Supplier is aware, shall be declared to allow Lantic the opportunity to take appropriate actions. Any ownership or beneficial interest in a Supplier’s business by a government official, representative of a political party or a Lantic employee shall be declared prior to entering into any business relationship with Lantic.

4.4 Gifts

Any business entertaining or hospitality shall be kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way decisions about how Lantic awards future business. Gift giving



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should occur sparingly and always be legitimate and aligned with Supplier's policies.

4.5 Confidentiality

All information about Suppliers' supply of products or services to Lantic and any information relating to future programs, ventures or proposals between Suppliers and Lantic need to remain confidential and not be disclosed outside of those of Suppliers' employees who need to know as part of their role. Suppliers need Lantic prior written consent for any other disclosure of Lantic information. In line with this confidentiality commitment, Lantic also requests that Suppliers maintain appropriate security measures and practices for all information including without limitation digital and electronic communications.

4.6 Health and Safety

Suppliers shall comply with all Applicable Laws regarding health and safety and provide employees with a safe, clean and healthy workplace that includes appropriate training, protective equipment and controls. Suppliers shall put in place appropriate measures in order to prevent occupational illnesses and work-related accidents.

4.7 Freedom of Association

Suppliers shall comply with all Applicable Laws regarding trade unions, freedom of association and collective bargaining. Employees who wish to join or not join trade unions and to bargain collectively shall not be interfered with, penalized or retaliated against. Employees shall not be discriminated against based on such associations.

4.8 Working Hours, Salaries and Wages

Suppliers shall comply with all Applicable Law and mandatory industry standards regarding wages, overtime, rest period requirements, paid vacation, benefits and working hours.

Employees must be provided with written and understandable information about their employment conditions in their own language including wages, hours, and paid vacation before entering into employment.

Equal pay and conditions should be provided for all people working in the same jobs in line with our commitment to non-discrimination.

4.9 Child Labour

All employees shall be of at least legal age established by Applicable Law. Official and verifiable documentation of each employee's date of birth, or a legally recognizable means of confirming each employee's age shall be kept on file.

4.10 Non-discrimination, Abuse and Harassment

Suppliers shall comply with all Applicable Laws regarding non-discrimination and shall not discriminate on the basis of race, national or ethnic origin, skin colour, religion, gender identity or gender expression, sexual orientation or religious or political beliefs, disability and impairment or marital status. There shall be no such discrimination in hiring, compensation, access to training, promotion and termination.

All employees shall be treated equally, with dignity and with respect at all times.

Supplier shall not engage in physical, mental, verbal, sexual or any other abuse, inhumane or degrading treatment, corporal



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punishment, or any form of harassment. Suppliers must provide a workplace free from harassment.

Illegal or excessive disciplinary actions or monetary fines are prohibited.

4.11 No Forced, Bonded, Slave and Human Trafficking

Suppliers shall comply with all Applicable Laws regarding forced, bonded or involuntary labor, slavery and human trafficking.

Employees shall:

- work on a voluntary basis and not be subject to any exploitation, such as forced, bonded and indentured labour, or sexual exploitation.
- not be subject to any forms of discrimination, coercion, fraud, deception, or giving up control of their person to another.
- maintain possession and have control of their personal identity and travel documents.
- not be required to make payments to employers, labour providers or agencies to obtain work.
- not have freedom of movement restricted by employee accommodation arrangements.

4.12 Environmental Sustainability

Suppliers shall comply with all Applicable Laws concerning the protection of the environment and shall measure and, where appropriate, seek to reduce the environmental impact of their business activities, including impact to air, water, soil and surrounding areas. In addition to complying with local laws, steps should be taken to optimize the use of energy and natural resources and reduce the generation of waste and to apply principles of sustainable development to production, manufacturing, harvesting, packaging, and distribution. Lantic is committed to working with all Suppliers to achieve these principles.

4.13 Land Rights of Communities

The rights and title to property and land of the individual, indigenous people and local communities shall be respected. All negotiations regarding their property or land, including the use of and transfers of it, shall comply with the principles of free, prior and informed consent, contract transparency and disclosure.

5.0 Compliance

All Suppliers are expected, at a minimum, to comply with the provisions of this Supplier Code of Conduct and to ensure its suppliers comply with the provisions of this Supplier Code of Conduct and report any suspected violations.

If Supplier or one of its suppliers does not comply or does not remain compliant with the provisions of this Supplier Code of Conduct, the undersigned Supplier shall notify Lantic immediately.

Lantic reserves the right to assess compliance with this Supplier Code of Conduct and require Supplier to undergo a corporate social responsibility compliance assessment either in a form of self-evaluation or the third-party visit. Suppliers are expected to promptly propose and implement improvements to achieve compliance.



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6.0 Supplier's Acceptance of this Ethical and Sustainable Sourcing Supplier Code of Conduct

This Supplier Code of Conduct is required to be signed by an officer of the Supplier.

I, _____, on behalf _____, acknowledge the receipt of this Ethical and Sustainable Sourcing Supplier Code of Conduct and confirm that we are, and will remain in full compliance with this Supplier Code of Conduct, at all times.

Supplier Name:	_____
Supplier Representative Name:	_____
Supplier Representative Signature:	_____
Date:	