



Guiding Principles for Suppliers & Contractors

Western Sugar places high emphasis on its corporate and social responsibilities towards its employees, shareholders, customers and suppliers, and the communities in which we operate. Through the years, Western Sugar has substantially increased its commitment to environmental, sustainability, social and communal activities.

Along with our Code of Ethics, and in light of the many laws, regulations, standards and customs in the areas in which we and our customers operate, the following Guiding Principles build the foundation on which Western Sugar operates.

This commitment comes from Western Sugar's CEO and senior management and is cascaded throughout our organization.

Western Sugar's Code of Ethics

The Western Sugar Cooperative Code of Ethics and Business Conduct Guidelines can be found on the Western Sugar Cooperative website at <https://www.westernsugar.com/code-of-ethics-business-conduct-guidelines/>.

Western Sugar's Core Values

In our daily business ICL employees are guided by our Code of Ethics and Core Values. Our Core Values include:

- ✔ **Commitment to Safety:** Provide the support and actions necessary for everyone to be injury-free.
 - Continuously improve our facilities, focusing on reducing risks
 - Being attentive to the needs and interests of our employees
 - Becoming a company with a zero-incident culture

- ✔ **Integrity:** Honesty and fairness guide our actions
 - Adhere to high ethical standards of business conduct
 - Always be fair and respectful to others
 - Exhibit loyalty to the company, while fostering loyalty in others

- ✔ **Openness & Trust:** Value and reward openness and trust
 - Being straightforward, honest and direct
 - Encourage free and open discussion
 - Being Approachable and friendly

- ✔ **Teamwork:** Strongly support collaboration for better outcomes
 - Act for the good of the group and company versus individual self-interest
 - Share information and resources with others
 - Show respect for others and their viewpoints
 - Go out of the way to help others succeed

🌱 **Entrepreneurship:** Value initiative to improve and capture new opportunities

- Have a sense of urgency and bias for action
- Encourage proper and thoughtful risk taking
- Show high initiative to deliver results

🌱 **Social Responsibility:** Believe in the development of the communities we touch

- Contribute funds and support employee time for local social activities
- Be involved with local economic development
- Act as stewards of the environments in which we operate

Laws & Regulations

Western Sugar's policy is to comply unconditionally with all applicable laws, regulations, statutes, treaties and standards wherever we operate.

Human & Employment Rights

Western Sugar respects and observes internationally recognized human rights and complies with all relevant labor and employment laws where we operate. Western Sugar adheres to the following principles:

🌱 **Freedom of association**

Western Sugar employees are free to form, join and/or participate in workers' organizations and exercise their right to engage in collective bargaining. Western Sugar maintains an open channel of communication with its employees.

🌱 **Forced or compulsory labor**

Western Sugar does not use forced, prison or indenture labor in any form. Western Sugar prohibits the use of threats of or actual physical or psychological violence or measures of economic pressure to force employees to perform labor or maintain employment.

🌱 **Child labor**

Western Sugar complies with the minimum age of employment required by the laws of the states in which we do business.

🌱 **Discrimination and Harassment**

Western Sugar employees are treated with respect and dignity. Western Sugar has no tolerance for discrimination or harassment in any form, against any person based on, including but not limited to, their religion, race, ethnicity, nationality, gender, sexual orientation, age or disability. Western Sugar supports the provision of equal opportunities to all its employees and candidates for employment.

🌱 **Salaries and working hours**

Western Sugar follows, at a minimum, state requirements regarding minimum wage, fringe benefits, working hours, overtime, sick leave and vacation. Western Sugar pays its employees fair wages and respects their need for life outside of work.

🌱 **Legal Employment**

Western Sugar employs only those with valid documents proving their right to work in the United States.

🌱 **Health and Safety**

Western Sugar complies strictly with occupational safety and health standards prescribed by local and state laws and standards. Western Sugar invests heavily in employee education and occupational safety and health measures not only to be in strict compliance with industry standards and local safety rules, but more importantly to try to prevent exposure of its employees and the surrounding communities to dangerous products and processes at all its locations.

Ecological and Environmental Protection

Western Sugar is fully committed to environmental and business sustainability including, but not limited to, the responsible usage and sustainable management of natural resources, reduction of environmental impact and waste. Moreover, we strive, to the extent possible and appropriate, including our use of best available technology (BAT) when technologically and economically feasible.

Business Conduct

Western Sugar conducts business with the highest of integrity standards. Western Sugar does not resort to illegal methods to obtain and retain customers, suppliers, business, permits, licenses or concessions. Western Sugar will not tolerate or participate in bribery, corruption, fraud or any other kind of unethical business behavior.

🌱 Anti-Bribery & Anti-Corruption

Western Sugar respects its relationships with governmental and official authorities, and complies with all the laws, regulations and standards applicable to its operations. Western Sugar does not tolerate any kind of improper influence on decision makers, including but not limited to offers of bribery or any other illegal activity, either directly or indirectly. Western Sugar uses internal guidance and contractual requirements to ensure that its employees and agents do not engage in bribery or corruption in any form.

🌱 Compliance Training

Western Sugar trains its employees regularly on its legal and regulatory requirements and Western Sugar policies, including the Code of Ethics and Core Values, and the employee's responsibility to act in an ethical manner, consistent therewith.

🌱 Reporting

To address fraud, abuse, and misconduct in the workplace Western Sugar provides a formal and confidential reporting system for its employees.

Rodney Perry
President & CEO