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Edison Grain General Code of Conduct Statement

Edison Grain Inc. is committed to providing our customers with high quality ingredients at reasonable prices that are also manufactured responsibly.

Edison Grain expects all workers, with an emphasis on those who make Edison Grainery Brand Products, to be treated fairly and with dignity and respect, and the products themselves are made in an environmentally sustainable manner.

In addition, Edison Grain Inc. requires our vendors who supply products for resale, to comply with applicable international and U.S. laws, regulations and industry standards.

In accordance with the California Transparency in Supply Chain Act, below you'll find information regarding the efforts we take to eradicate slavery and human trafficking from our supply chain while maintaining social accountability and supply chain transparency.

Business Ethics Commitment & Verification:

- Edison Grain Inc. complies with all applicable local laws and regulations.
- Edison Grain is committed to fair labor practices throughout our supply chain.
- Edison Grain Inc. refrains from any form of corruption.
- In general, our accountability standards contain specific areas of conduct, including the prohibition of forced and child labor. All areas of commerce are annually assessed during on-site audits conducted by a third-party auditor who identifies and verifies that suppliers are not at risk for violating any human trafficking laws or food safety procedures.
- All business is conducted with integrity.
- All business transactions are accurately and completely recorded, and guarantee legal and fiscal compliance.
- Edison Grain Inc. reports possible violations of process controls to our customers.
- See Recall Policy: <http://edisongrain.com/preview/wp-content/uploads/2017/04/EG-Recall-Policy.pdf>
- Our policy is regularly reviewed and reinforced as business needs and requirements change.
- To ensure that our suppliers respect and adhere to our company policies and standards, upon any discovery of a violation with our ethics, we respond in a manner commensurate with the nature and extent of the violation.

Our Commitment to Upholding Human Rights & Labor Conditions:

- Edison Grain Inc. does not use child, forced or compulsory labor.
- Edison Grain Inc. does not discriminate based on nationality, race, religion, gender, age, sexual orientation, disability, etc.
- Edison Grain Inc. respects the right of our employees to freedom of association and has an employee grievance process.
- Edison Grain Inc. complies with relevant International Labor Organization (ILO) standards.
- Edison Grain Inc. provides safe and healthy working conditions for all employees, contractors and visitors.
- Edison Grain Inc. provides appropriate wages and working hours, according to applicable laws, for all employees. Edison Grain Inc. does what we are able to ensure that all workers are paid a “living wage” (i.e. the minimum remuneration to support basic needs in the area of operation).
- Edison Grain Inc. provides clear written guidelines to employees explaining the terms and conditions of our employment, and our rights and duties.
- See GMP Statement: <http://edisongrain.com/preview/wp-content/uploads/2017/04/EG-GMP-Statement.pdf>
- Edison Grain provides employees and management, who have direct responsibility and interaction with supply chain management, training on fair labor practices and human trafficking and slavery, particularly with respect to mitigating risks within our supply chain.
- Annual auditing of manufacturing agreements and procedures highlight the importance to our business, supplier factory works and consumers.

Our Commitment to the Environment

- Edison Grain Inc. complies with all relevant environmental laws and ensures that the necessary permits are in place.
- Edison Grain Inc. strives for continuous improvement of our environmental performance by minimizing the use of raw materials, energy and water, emission to air, water and soil and the production of waste, including food waste and landfill usage.
- See Sewage Sludge/Fertilizer/Pesticide/Irradiation Statement: <http://edisongrain.com/preview/wp-content/uploads/2017/04/Sewage-Sludge-Fertilizer-Pesticide-Irradiation-Statement.pdf>
- See Packaging Compliance Statement: <http://edisongrain.com/preview/wp-content/uploads/2017/04/NOP-PACKAGING-COMPLIANCE-STATEMENT.pdf>

Our Commitment to Product Quality and Safety:

- All products and services meet or surpass FSMA regulations.
- All products undergo a robust pathogen testing by a 3rd party lab.
- Random pesticide residue testing is performed.
- Edison Grain Inc. provides transparency to customers about the test results of our products and production processes.
- Lot Specific tests and Technical Data Sheets are posted online: <http://edisongrain.com/products/>
- See FSMA Compliance/Food Safety Plan Statement: <http://edisongrain.com/preview/wp-content/uploads/2018/07/EG-FSMA-Compliance-Food-Safety-Plan.pdf>

- Owners Jeffrey, Amy & Lyndsy Barnes oversee supplier auditing to ensure compliance with our standards. All third-party audits are reviewed by qualified individuals. Supervision over procurement, production and shipping ensure that our suppliers maintain compliance with our policies.
- Any supplier that fails to comply with applicable laws or ethical business practices may be subject to immediate business suspension or termination.
- All factories suppliers in “high risk” geographies are required to be audited and certified prior to procurement, and rectified every year thereafter.
- Each audit – performed by an independent third-party auditor - is reviewed and must demonstrate adherence to our policies. If a factory fails to demonstrate progress on implementing corrective action, we terminate the relationship.

Our Intellectual Property Commitment & Customer Care:

- Edison Grain Inc. protects all confidential information provided by our respective business partners.
- See Customer Care Policy: <http://edisongrain.com/preview/wp-content/uploads/2018/07/EG-Customer-Care-Policy.pdf>

Our Commitment Procure Products Responsibly:

- Business practices of our suppliers are reviewed annually to ensure that their values and procedures align of those of Edison Grain Inc.
- See Supply-Chain Program Statement <http://edisongrain.com/preview/wp-content/uploads/2019/01/EG-Supply-Chain-Program-Statement.pdf>

Jeffrey E. Barnes, President
Edison Grain Incorporated



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