



GRAIN  CRAFT

ETHICS & COMPLIANCE

GUIDEPOSTS

2021

Grain Craft's Foundational Guide for Best Business Practices.

At Grain Craft our history and our core values define who we are as a company. Both of these elements are a foundational component of how we make decisions and perform our work. As our history demonstrates, we believe that people, not buildings or equipment, determine whether an organization will succeed and we have anchored this philosophy in a set of core values based on a customer-centered, can do culture.



MESSAGE FROM OUR PRESIDENT



“I hope you all have seen and experienced the foundation of trust and integrity in which Grain Craft was built.”

The word “integrity” is a powerful character attribute. Acting with integrity in all we do is critical, not only to the success of our business, but the impact that we have on our friends, families, communities and ourselves. When we choose what is right we are creating a culture that sustains at a higher level.

Many of you have been with this company long enough to reach significant career milestones. While others might be new to our family, I hope you all have seen and experienced the foundation of trust and integrity in which Grain Craft was built.

While expectations have been set and trust is something you are automatically appointed once you join the Grain Craft family, it is our charge to thoroughly take care of our employees, leaving no room for gray areas and lack of judgement. It is for this reason - in the best interest of each of our employees - that we established this Ethics and Compliance handbook. This handbook is meant to be used as a guideline when circumstances are unclear. It is also meant to inform current and prospective Grain Craft employees on our approach to the significant topics that follow throughout this booklet.

I ask that you familiarize yourself with the information in this handbook and ask questions if and when you have them. I appreciate each of you, your integrity, your drive and the trust you have put in us. Let's continue to lead with responsibility for ourselves and each other.

OUR CORE VALUES

Trusting People

We intentionally establish an environment of mutual trust and respect. The integrity of each team member is essential to maintaining that trust. With an attitude of humility, we make positive assumptions about one another, communicate with openness and sincerity, and commit to do the right thing.

Valuing People

We implement behaviors and practices that underscore the value of each member of our team. We recognize the value of team member involvement in our decision-making processes. We invest in our team through competitive wages and benefits and we invest in their learning and development by providing training, mentoring, and resources that facilitate growth.

Excellence

We aim for excellence in everything we do. We set high expectations for ourselves that drive us to improve everything every day, learn from our experiences and innovate. We draw on the different perspectives, experiences and talents of our team members to help us make informed decisions. We work hard - individually and as a team - to consistently exceed the expectations of all our stakeholders and customers. At Grain Craft, we have established a High-Performance culture; a standard that can be traced back to the beginnings of the company.

Safe People & Products


We devote ourselves to the safety of our team and our customers. We are all committed to do everything we can to offer safe products made in a safe work environment - never compromising. Over the past two years we have placed a continued emphasis on behavior-based safety practices throughout all our facilities and all Grain Craft mill employees have undergone extensive behavior-based safety training to establish individual ownership and to anticipate and amend unsafe working conditions.

Community

We commit to make a positive impact on the people in the communities where we do business. We implement sustainable business practices to preserve the environment of our communities and ensure good jobs for future generations.

CODE OF CONDUCT

“We are committed to providing a harassment-free environment, in which we all have an opportunity to contribute at our highest potential.”



CHILD LABOR LAWS

Grain Craft forbids the use of child or forced labor in any operations or facilities, and will not tolerate the exploitation of children. Grain Craft fully respects all applicable laws and does not permit workers under the age of 18 to work in hazardous conditions.

WAGE AND HOUR PRACTICES

Grain Craft pays employees a competitive wage, consistent with our core value of valuing people. We reward our employees for improving their skills and capabilities and encourage continued learning to advance both knowledge and career level. At a minimum, we comply with all applicable wage and hour laws, rules and regulations, including minimum wage, overtime and maximum hours.

FMLA

Grain Craft complies with all state and federal Family and Medical Leave laws.

ADA / RESPECTING OUR WORKPLACE

Grain Craft is committed to providing equal opportunities in employment. This means we must treat your fellow employees, Grain Craft applicants and external parties with whom we do business fairly, and we will never engage in any form of unlawful discrimination. We follow all anti-discrimination laws, and in our employment decisions (such as recruiting, hiring, training, salary and promotion), we do not discriminate against individuals on the basis of race, color, gender, age, national origin, religion, sexual orientation, gender identity, gender expression, marital status, citizenship, disability, veteran status, HIV / AIDS status or any other legally protected factor.

DISCIPLINARY

Grain Craft has a culture of openness and trust. However; if an employee does not adhere to our ethics and compliance policy, disciplinary action will be determined by the employee's team leader and/or a representative from Human Resources.



MODERN SLAVERY & HUMAN TRAFFICKING

Grain Craft is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the U.S. and to safeguard employees from any abuse or coercion. We do not enter into business with any organization, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labor.

WHISTLEBLOWERS AND RETALIATION

Grain Craft does not tolerate any form of retaliation against any person who reports a suspected violation in good faith. In addition, no one who participates or cooperates honestly and completely in the investigation of a report will be subject to retaliation for doing so. Anyone who retaliates against a person for making a good faith report or for participating in the investigation of a report will be subject to disciplinary action, which may include termination.

CORRUPTION AND BRIBERY

Grain Craft and its employees do not pay or accept bribes or other similar payments to uphold or to contribute to Grain Crafts business. Improper payments to anyone, whether authorities, business partners, customers or anyone else, for any reason are not allowed to be offered or made. Business is obtained solely based on the merits of Grain Craft's products and services.

In general, you may only offer or accept gifts that are:

- Lawful, unsolicited, and infrequent;
- Not dependent on you doing or promising to do anything;
- Not cash or cash equivalents such as gift cards; and
- Nominal in value

CODE OF CONDUCT CONT...

DIVERSITY AND INCLUSION

Grain Craft embraces the variety of backgrounds and life experiences our team members bring to work. We offer the perspectives of different genders, local customs, physical abilities, races, religions, sexual orientations, gender identities, life experiences and socioeconomic statuses, and we vary in our personal styles of thinking, expressing ourselves and problem-solving. To be successful, each of us has to demonstrate respect for those who are different from us. We expect you to be accepting and open about differences in others. This applies to the way we treat each other, along with anyone else with whom we interact.

GENDER, RELIGION, SEXUAL ORIENTATION

It is Grain Craft's policy to provide equal opportunity in employment for all qualified individuals without regard to race, creed, color, gender, age, national origin, handicap, or US veteran status.

All members of management are responsible for assuring that day-to-day practices, including job assignments, performance discussions, counseling, on-the-job training, overtime, requests for leaves, etc. are administered without regard to sex, race, or other discriminatory factors and free of harassment. If an employee feels he or she has been treated unfairly, the employee will be encouraged to discuss the situation with his or her immediate team leader. The employee may also bring the situation to the attention of the Human Resources Dept.

SEXUAL HARASSMENT

At Grain Craft, no sexual harassment of any kind is tolerated. Actions that are intimidating or threatening are likewise prohibited. We are committed to providing a harassment-free environment, in which we all have an opportunity to contribute at our highest potential. "Harassment" is behavior that creates an offensive, intimidating, humiliating or hostile work environment that unreasonably interferes with another person's work performance. Harassment may be physical or verbal, and may be done in person or by other means (such as harassing notes or emails). All allegations of discrimination or sexual harassment will be investigated and resolved in a timely manner.

UNIONS

We support the established unions within the company and are committed to offering each union member with equal opportunities and holding them to the same accountabilities as non-union employees.

SAFETY

Safety is an inherent part of our day-to-day duties. Everyone has committed to focus their attention and actions on theirs and others safety behaviour. If you are aware of any hazardous conditions, unsafe practices, incidents of injury, near misses, accident or illness related to our workplace, you must let your manager or supervisor know immediately. Unless you are qualified to correct the unsafe condition, you must not attempt to do so on your own.

We believe that the responsibility of safety belongs to all of and that is why we focus on Behavior Based Safety. Behavior Based Safety is a process that creates a safety partnership between management and employees that continually focuses people's attentions and actions on theirs, and others, daily safety behavior. Safe behavior creates safe actions and we offer a series of training throughout the year to continually enhance our Behavior Based Safety knowledge and process.

CALIFORNIA TRANSPARENCY SUPPLY CHAIN ACT (CTSCA)

Respect for human rights is a part of our core values at Grain Craft. We are committed to ensure that people associated with the businesses and connected to the supply chains are treated with respect and dignity. Grain Craft establishes policies for its suppliers addressing the content of products supplied to the company and expects its suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. To that end, the company seeks to verify each supplier's compliance with our sourcing requirements and to ensure that they manufacture products in accordance with fair and reasonable labor and human relations practices and do not participate directly or indirectly in any form of slavery or human trafficking.

Grain Craft monitors and reviews all suppliers on a regular basis and reserves the right to verify our suppliers' compliance with our standards and policies through periodic audits of our suppliers' facilities and operations. Grain Craft also reserves the right to demand corrective measures from our suppliers when necessary and to terminate any supplier who does not comply with our standards and expectations.

LAND RIGHTS

Grain Craft is committed to doing business the right way and has a zero tolerance for illegal activities in our supply chain and land displacements of any legitimate land tenure holders. Agriculture is an integral part of Grain Craft's supply chain. Our products depend on a safe, high quality, and affordable supply of agricultural raw materials to meet the demands of our business as well as the expectations of our consumers, customers and other stakeholders.

Agriculturally based raw materials are supplied to Grain Craft by our suppliers, both directly and indirectly, from farms and processors only in the U.S.

Grain Craft will:

- Engage with appropriate industry and other groups to positively impact and respect all legitimate land tenure rights and the people who hold them.
- Utilize the Grain Craft Sustainability Statement to ensure continued engagement with and compliance by suppliers on relevant land issues.
- Commit to a presumption of transparency such that relevant information related to land acquisitions by Grain Craft will be made public if circumstances permit.
- Actively engage, and appropriately advocate, on the latest policies, programs, and opportunities concerning land rights and tenure in industry, governmental and international organizations that are addressing land rights policy.

- In order to ensure a confidential and safe process for investigating grievances which are raised by affected parties and to help ensure the Grain Craft Sustainability Statement is properly implemented, Grain Craft and our suppliers will utilize appropriate reporting mechanisms for communicating suspected breaches of this policy to Grain Craft.

Grain Craft follows the IFC Performance Standards definition of FPIC which can be summarized as:

- Free - Consent to the sale of land is given voluntarily and absent of "coercion, intimidation or manipulation."
- Prior - Consent is sought sufficiently in advance of any authorization or commencement of activities from an existing landowner.
- Informed - Ensures that information is provided prior to seeking consent to acquire and that information is provided as the acquisition process proceeds.
- Consent - Refers to the collective decision made by the land rights-holders and reached through the customary decision-making processes of the affected peoples or communities.

Protecting farmers' land rights is essential if we are to foster food security, long-term stewardship of our natural resources and the development of rural communities.

SUSTAINABILITY

At Grain Craft, we're committed to help preserve the environment by minimizing our environmental footprint and conserving natural resources. Every day, we strive to further our existing sustainability efforts by promoting innovations at all levels of the company. To us, there is no finish line. Our mission is to continually effect positive change on behalf of the communities and customers we serve.

Our sustainability initiatives are focused on these key practices:

Procurement – Local wheat sourcing, sustainable ingredient sourcing, sustainable farming practices, grower resources and education

Milling Facilities – Recycling, local power efficiency audits, motion lights, controlled water systems, updating to high efficiency systems

Transportation – Maximizing rail and truck capacity, tractor and trailer tire efficiencies, reducing wheat load shuttles

OUR MISSION

Through trust, dedication and relationships, we unlock the goodness of grain and nourish people.



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