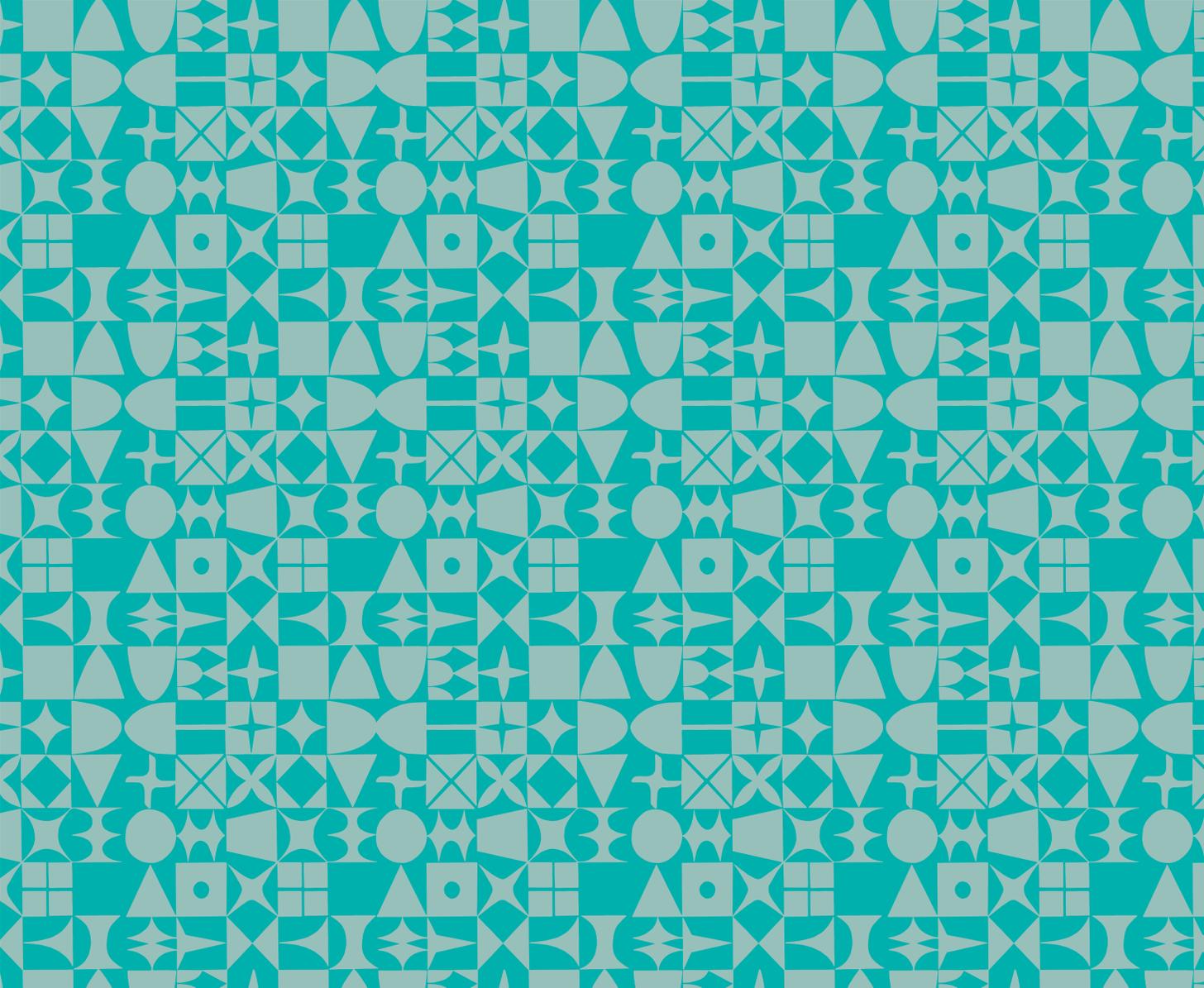


Land O'Lakes Supplier Code of Conduct



For 100 years, Land O'Lakes, Inc. has conducted business ethically and with the highest integrity. A farmer-owned cooperative with a global reach, we strive to be a good corporate citizen by doing the right thing, every time. Careful stewards of the Earth, we work to preserve our natural resources for the generations to come. We are committed to product quality and safety. Nothing is more important to us than the health and safety of the people and animals we feed. We seek suppliers and business partners who share our unwavering commitment to integrity and who can meet our high quality standards.

Our Supplier Code of Conduct sets forth the minimum standards that our Suppliers¹ must follow to provide goods or services to Land O'Lakes, our subsidiaries or affiliates.

The standards in this Code are based upon the principles of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the UN Global Compact. Our Suppliers are required to implement in their businesses and supply chains the principles described in this Code or to comply with standards and principles that are, at a minimum, materially the same. We reserve the right to amend this Code.

We value our relationships with our Suppliers and recognize that compliance is an evolutionary process. We expect our Suppliers to immediately address any shortcomings, and we encourage our Suppliers to continuously improve their operations. We are committed to working with our Suppliers to meet these compliance obligations:

1. COMPLYING WITH THE LAW

Suppliers must comply with all applicable laws, rules, regulations and industry standards. If there is a conflict between this Code and any applicable law, the highest standard shall apply.

2. PROTECTING HUMAN RIGHTS

Land O'Lakes is committed to protecting fundamental human rights throughout our organization and supply chain. Suppliers shall promote fundamental human rights by:

a. Prohibiting Child Labor

The use of child labor is strictly prohibited. In absence of any national or local law, a "child" is defined as a person less than 15 years of age. If local minimum age law is set below 15, such law must be in accordance with the exceptions under the International Labour Organization Convention 138. No one under the age of 18 should perform work likely to jeopardize their health or safety or improperly interfere with their educational needs.

b. Prohibiting Forced or Compulsory Labor

Suppliers must not use, nor benefit from, involuntary labor – whether forced, bonded, slave, prison, military, compulsory or indentured.

Workers must be able to freely enter and leave the workplace. Suppliers cannot retain identity documents or other valuable items as a condition of employment.

Suppliers must pay the cost of recruitment or reimburse workers who have paid recruitment fees. Suppliers shall not use threats of violence, harassment or physical punishment to discipline or control its workers.

c. Treating Employees with Respect and Dignity

Suppliers shall treat its employees with respect and dignity while maintaining a workplace free from discrimination, harassment and violence. All forms of harassment and discrimination are prohibited, which includes discrimination on the basis of race, color, religion, sex, ethnic or national origin, marital status, pregnancy, disability, military or veteran status, sexual orientation, gender, gender identity or expression, or age. Employment decisions must be based upon merit.

3. PROVIDING A SAFE WORK ENVIRONMENT

Suppliers must provide their workers with a safe and clean working environment. Suppliers must ensure that its manufacturing processes are safe, workers are properly trained, safety equipment is provided as needed and appropriate emergency and crisis plans are in place. At a minimum, potable drinking water, adequate lighting, ventilation and sanitation must be provided.

4. RESPECTING FREEDOM OF ASSOCIATION

Suppliers shall respect workers' freedom of association and right to participate in labor unions and engage in collective bargaining in accordance with applicable law.

5. PROVIDING FAIR EMPLOYMENT TERMS

Suppliers will comply with all applicable wage laws, including those related to minimum wage and overtime pay. Working hours and workweeks shall be set in accordance with applicable law or an applicable collective bargaining agreement. Workers must be paid in a timely fashion. Suppliers must provide all employment benefits required by applicable law.

6. PRACTICING ENVIRONMENTAL SUSTAINABILITY

Suppliers must comply with all applicable environmental laws and regulations. However, Suppliers are encouraged to go beyond laws and regulations to ensure that their manufacturing processes are environmentally responsible. Suppliers should strive to act in ways that reduce the impact of their operations on the environment.

7. CONDUCTING BUSINESS FAIRLY

Land O'Lakes is committed to conducting business with integrity and on the basis of merit. When conducting business related to Land O'Lakes, Suppliers shall:

a. Comply with Antitrust Laws

Antitrust laws are designed to promote free and fair competition. Suppliers shall follow all applicable antitrust and fair competition laws.

b. Never Engage in Bribery of Any Kind

Suppliers must follow all applicable anti-corruption/anti-bribery laws, which may include the U.S. Foreign Corrupt Practices Act (FCPA). In connection with its dealings with Land O'Lakes, Suppliers shall never – directly or indirectly – offer, promise or authorize the giving of anything of value in exchange for favorable treatment. In connection with its dealings with Land O'Lakes, Suppliers must never accept bribes or kick-backs of any kind.

c. Avoid Conflicts of Interest

Suppliers should take steps to avoid actual, or perceived, conflicts of interest. Suppliers should not offer gifts or entertainment to anyone, including Land O'Lakes employees, that could improperly influence business decisions – or that could appear to improperly influence business decisions.

8. SUPPLYING SAFE, QUALITY PRODUCTS

Land O'Lakes produces safe, high-quality products. Suppliers must supply food products or ingredients that are safe for the intended purpose, pure, wholesome, unadulterated and in compliance with all applicable laws.

9. ENSURING ANIMAL WELFARE

Suppliers must ensure the welfare of all animals under its care or within its supply chain. Suppliers shall implement procedures to prevent the mistreatment of those animals and shall not tolerate animal cruelty, intentional abuse or neglect.

Suppliers of dairy-based products or ingredients shall ensure milk is procured only from sources compliant with the National Milk Producers Federation Farmers Assuring Responsible Management (FARM) Animal Care Program or an equivalent recognized standard that includes third-party validation of animal care practices.

10. COOPERATING WITH AUDITING AND REPORTING

Suppliers must be able to demonstrate compliance with this Code upon request. Land O'Lakes reserves the right to use a third-party to audit Suppliers' compliance with this Code. We expect Suppliers to take action to correct any compliance issues. If Suppliers cannot demonstrate compliance with this Code or meaningful corrective action, we reserve the right to end our relationship and terminate any agreements.

If Suppliers are aware of any ethical issues or concerns regarding Land O'Lakes, its products, or employees, reach out to our Connect Hotline at:

- **1-855-TELL LOL (1-855-835-5565),
U.S. & Canada**
- **470-219-7131, International Collect**
- **www.connecthotline.ethicspoint.com**

