

## **Chobani Supplier Code of Conduct**

At Chobani, we believe that business can be one of the most powerful forces for good in the world. That extends to how we make our products, how we treat our people and how we conduct business. Beyond adhering to applicable legal, ethical and industry standards, and all relevant laws and regulations, we strive to raise the bar with every decision we make. That, we believe, is how we can continue to make a difference.

This belief extends outside of just our company. We expect all parties who provide goods and services to Chobani to join our commitment and conduct business in a manner that reflects and adheres to the principles and ethical standards on which our company was built.

As part of the Chobani supply chain, we look forward to working together with our Suppliers to ensure our companies positively impact our communities, our planet, and our people.

### **1. APPLICATION AND SCOPE**

This Supplier Code of Conduct ("Code") applies to Suppliers to Chobani Global Holdings LLC, and its subsidiaries, specifically including Chobani Pty Ltd (all such entities which shall be collectively known in this Code as "Chobani"). For the purposes of this Code:

- suppliers to Chobani and their subcontractors, agents, business partners, personnel, officers and the like will collectively be referred to as "**Supplier**" or "**Suppliers**"; and
- the term "**personnel**" includes all individuals engaged in performing work for the Supplier (such as full-time employees, part-time employees, casual employees, as well as contractors, agency staff, and other similar persons).

Suppliers must comply with:

- the laws of the jurisdictions in which they operate and any other laws which they are required to comply with in other jurisdictions as a consequence of their operations, including those on labor practices, business ethics, health, safety modern slavery, human rights, and environment; and this Code;

In keeping with the United Nations Principles on Business and Human Rights, if national laws conflict with the requirements in this Code, Suppliers should adhere to the standards that provide the highest level of protection and find ways in which to honor the principles of internationally recognized human rights.

### **2. HUMAN RIGHTS AND LABOR**

**a. Violence and Harassment in the Workplace**

Suppliers must provide their personnel with workplaces that are free of violence and harassment, in any form. Suppliers are expected to treat their personnel with respect and dignity and shall not threaten or subject personnel to harsh or inhumane treatment, including but not limited to verbal abuse, psychological abuse, mental and physical coercion, and sexual harassment.

**b. Employment & Non-Discrimination Practices**

Suppliers must conduct all their operations in a socially responsible, non-discriminatory manner including, but not limited to, those associated with equal opportunity, child labor, forced or compulsory labor, working hours, compensation, freedom of association, collective bargaining and harassment free work environment, and occupational health and safety (physical and psycho-social). Suppliers must ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, creed, age, sex, sex stereotype, gender, gender identity or expression, transgender, sexual orientation, national origin, citizenship, disability, marital and civil partnership/union status, pregnancy, veteran or military service status, genetic information or any other characteristic protected by relevant laws, rules or regulations.

**c. Modern Slavery and Freely Chosen Employment**

Suppliers must ensure their workforces are free from any forms of modern slavery or forced labor, including but not limited to slave, indentured, bonded, prison labor, forced marriage, or any form of human trafficking. All work must be voluntary, and personnel must be free to terminate their employment at their option. There shall be no unreasonable restrictions on personnel's freedom of movement. Any restrictions for personnel to voluntarily end their employment, such as notice periods in excess of legal requirements, withholding of identity papers or fines for terminating their employment contracts, are prohibited.

**d. Child Labor and Young Personnel**

Child labor is prohibited. Suppliers shall not employ personnel who are less than the minimum legal age dictated by the International Labour Organization or under the minimum age for employment in the country, whichever is greater. Suppliers must ensure all personnel are above the legal employment age in the country of their employment, and comply with requirements related to hiring, wages, hours worked, overtime, and working conditions.

**e. Freedom of Association and Collective Bargaining**

Suppliers must respect their personnel's legal rights to freedom of association and collective bargaining. In addition, Suppliers must ensure rights of personnel to make an informed decision as to whether to associate or not with any worker organization, including trade unions, are respected. Suppliers shall not retaliate in response to the exercise of such rights, and no remuneration or payment whatsoever shall be offered or withheld to personnel in order to hinder the exercise of such a right.

#### **f. Wages, Benefits and Work Hours**

Suppliers' personnel must be compensated with wages, overtime and benefits that meet or exceed legally mandated minimum standards. Compensation and benefits shall be provided in a way that is prompt, paid in full and in a language easily understood by all personnel. Wages shall not be subject to deductions as a disciplinary measure. Chobani encourages Suppliers to offer their personnel sufficient training and educational opportunities. Suppliers shall ensure that work schedules and overtime are consistent with applicable laws and collective bargaining agreements, whichever affords the greater level of protection, including maximum hour and rest period laws.

#### **g. Workplace Safety**

Suppliers must ensure a safe working environment for their personnel. Suppliers must provide personnel with a safe and clean working environment taking into consideration the prevailing knowledge of the industry and of any specific hazards. Suppliers must have in place appropriate safety policies to achieve these requirements. Chobani expects its Suppliers to develop and implement occupational health and safety procedures and provide ongoing training to protect the health and safety of all personnel in their personnel's primary language.

#### **j. Migrant Workers**

Migrant workers shall have the same entitlements as local personnel as stipulated by relevant laws and regulations. Fees and costs associated with labor recruitment should be paid for by the employer, not the employee. The Supplier must not require the worker to surrender identification documents.

### **3. ENVIRONMENT**

Suppliers must also use reasonable endeavors to comply with international standards on environmental protection, including as follows:

**a. Water Use.** Suppliers shall use water responsibly, especially in regions where water resources are significantly under stress. Suppliers shall also comply with local government's mandated water use, consumption, discharge, and conservation policies and regulations.

**b. Waste Management.** Suppliers shall responsibly manage waste generated from operations. Suppliers shall dispose of waste material in an environmentally responsible manner.

**c. Energy & Emissions Management.** Suppliers shall manage all activities that directly and indirectly generate greenhouse gas emissions within their operations and supply chains and strive to reduce production of these emissions. Suppliers shall also comply with all relevant mandated emissions reductions and reporting regulations. The boundaries of emissions requirements include all categories set out under the Greenhouse Gas Protocol, as relevant to the Supplier.

#### 4. BUSINESS ETHICS

##### **a. Animal Welfare**

All Suppliers in our global operations must, at a minimum, have processes in place to monitor and ensure that animals are treated humanely and with respect, strive to improve traceability throughout its supply chain.

##### **b. Bribery, Corruption and Sanctions**

Suppliers shall comply with all applicable anti-corruption and anti-bribery laws. Suppliers must not engage in corrupt or unethical practices, such as offering or accepting bribes, kickbacks, favors or use of any improper influence when dealing with governmental officials or in any other business arrangement. Additionally, Suppliers must fully comply with all applicable U.S. and non-U.S. export control laws and shall not engage in business with any country or region subject to comprehensive embargo sanctions by the United States, Australia, European Union or United Nations or to any individual or entity that appears on a blacklisted, blocked, or debarred list.

##### **c. Competition and Fair Dealing**

Suppliers must not enter into formal, informal or implied anti-competitive arrangements, including those that fix prices, collude, rig bids, limit supply, or allocate/control markets. They must not exchange current, recent, or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition. Suppliers must not steal

proprietary information, possess trade secret information that was obtained without the owner's consent, or induce such disclosures by past or present suppliers of other companies.

#### **d. Conflicts of Interest**

Suppliers must avoid all conflicts of interest or situations that give rise to the appearance or perception of a potential conflict of interest. Suppliers must provide immediate notification to all affected parties (including Chobani) in the event that an actual or potential conflict of interest arises. This includes a conflict between Chobani's interests and the interests of a Supplier, a Supplier's personnel, or its personnel's close relatives, friends, or associates.

#### **e. Anti-Retaliation**

Suppliers shall prohibit unlawful retaliation, including threats, intimidation, and attacks, against individuals who report a compliance or ethical issue learned during the course of work performed for Chobani, who cooperate in good faith with the investigation of a complaint, or who defend environmental or human rights. Suppliers shall create a mechanism for personnel to submit their grievances anonymously and demonstrate that their complaints are reviewed and investigated.

#### **h. Confidentiality and Privacy**

Suppliers must not share any confidential information with any person who is not authorized to see it, and must take measures as required by relevant law to protect personally identifiable information in its possession from unauthorized disclosure.

### **5. POLICIES, PROCESSES, AND PROCEDURES**

#### **a. Responsible Sourcing**

Suppliers must have ethical and responsible sourcing practices in place and source only from companies that satisfy the requirements of this Code and any responsible sourcing programs implemented and notified by Chobani from time to time.

#### **b. Grievance Procedures**

Suppliers shall maintain internal programs for handling reports of workplace and other grievances that are anonymous, unbiased, responsive, confidential, and communicated to personnel. Such reports should be promptly investigated, and corrective action should be taken where necessary. Suppliers' procedures must prohibit retaliation.

#### **c. Risk and Audit Assessments**



669 County Road 25  
New Berlin, NY 13411

2620 East Tioga Street  
Philadelphia, PA 19134

18-20 Quality Drive  
Dandenong South, VIC

Each Supplier must allow Chobani to perform, to the extent reasonably practicable, periodic evaluations of its facilities, operations, and its own relevant suppliers, to audit compliance with this Code. If an audit identifies a violation of this Code, the Supplier shall act promptly to correct the situation to Chobani's satisfaction. Chobani reserves the right to suspend or terminate a Supplier who fails to correct violations. We require Suppliers to adopt the same approach with their own suppliers and extend the principles of this Code throughout their supply chain.

**d. Reporting**

On request, the Supplier shall provide relevant, timely and accurate data to Chobani, including but not limited to disclosures concerning human rights and modern slavery, emissions, land-use, water-use, biodiversity, country-of-origin and other matters contemplated by this Code. These requirements may extend beyond the Supplier throughout its supply chain.

**e. Modifications**

Chobani reserves the right to review this Code from time to time and modify or replace it as relevant or necessary, as notified and posted on Chobani.com and chobani.com.au.

Version 2.0

Updated December 2024