



# Code of Conduct

For business partners

Contents  
of Alltech’s  
Code of  
Conduct

**Introduction** .....3

**Business Partner Operations**

- Health and Safety* ..... 5
- Workplace Environment*..... 6
- Environment and Sustainability* ..... 7
- Product Quality and Safety* ..... 8

**Business Practices**

- Ethics* ..... 9
- Trade Compliance*..... 10
- Responsible Sourcing*..... 11

**Working with Alltech**

- Alltech Sites and Assets* ..... 12
- Intellectual Property and Data Privacy* ..... 13
- Recordkeeping* ..... 13
- Marketing, Social Media and Communication* ..... 14



# Introduction

## **Our purpose**

Alltech and its family of companies (“Alltech”) deliver smarter, more sustainable solutions for agriculture. Our diverse portfolio of products and services improves the health and performance of plants and animals, resulting in better nutrition for all and a decreased environmental impact.

Alltech is uniting the agri-food community in Working Together for a Planet of Plenty™ because we believe agriculture has the greatest potential to positively shape the future of our planet. Together, we can provide nutrition for all, revitalize local economies and replenish the planet’s natural resources.

## **Our values**

At Alltech, integrity is at the heart of the values we draw upon for decision-making and conducting business. These values are our founding principles and are fundamental to our future and achieving our purpose. They represent our shared commitment to our customers, the more than 350 communities in which we live and work, and to you — our Business Partners.

## **Our commitments**

We believe in demonstrating our purpose and values through tangible actions and commitments. Alltech took a significant step toward achieving our purpose by committing to the U.N. Global Compact, which focuses on positive advancements in human rights, labor, the environment and anti-corruption. In addition, we are focused on advancing nine of the United Nations’ 17 Sustainable Development Goals (SDGs) that are particularly relevant to our business. Through these commitments and others, we aim to create a world of abundance and inspire others — including our Business Partners — to join us in doing the same.

## **Our Business Partners**

Business Partners play a crucial role in Alltech’s success and in helping us achieve our purpose. Alltech seeks to ensure that our Business Partners are aligned with our core values, and we have developed this Business Partner Code of Conduct (“Code”) to support this goal. In the Code, we explain how we expect our partners to act ethically, sustainably and in compliance with applicable laws.



# Introduction

## **Who must follow this code?**

Alltech expects its suppliers, contractors, agents, distributors, consultants, joint-venture partners and any other third parties doing business with Alltech to act in a manner consistent with this Code. We also expect our Business Partners to ensure that subcontractors and other supply chain partners they engage on our behalf do the same.

## **Business Partner accountability**

How our Business Partners work in accordance with this Code is an essential part of their performance for Alltech. Alltech may elect to not work with or cease to work with Business Partners who do not meet our expectations. Any violation of this Code or applicable laws may result in termination of the Business Partner's relationship with Alltech.

## **Questions**

If you have questions regarding the Code or about our expectations of our Business Partners, please contact our Global Ethics & Compliance team ([partnerintegrity@alltech.com](mailto:partnerintegrity@alltech.com)).

## Health and Safety

The well-being of the people who support Alltech is our highest priority. We are committed to everyone going home safely every day, and we expect a similar commitment from our Business Partners.

We expect our Business Partners to:

- Maintain a safe and healthy work environment and operate work areas in accordance with all applicable occupational health and safety laws and regulations.
- Obtain and comply with all required health and safety permits.
- Take proactive steps to identify and address safety concerns and prevent workplace-related fatalities, injuries and illnesses.
- Identify potential emergency situations and be prepared to execute emergency response plans.
- Have strict substance abuse policies that prohibit impaired team members from driving or operating machinery that may pose a danger to themselves or others.
- Provide and use appropriate personal protective equipment (PPE) (e.g., gloves, steel-toed shoes or boots, safety glasses, goggles, hearing and respiratory protection) where applicable to eliminate, control or otherwise mitigate potential workplace hazards.
- Encourage and enable team members to confidentially report concerns of unsafe conditions or practices without fear of reprisal.

## Workplace Environment

Alltech is committed to observing and supporting fair labor practices and treating our team members with dignity and respect. We do not tolerate any form of abuse, harassment or discrimination based on protected characteristics. We expect our Business Partners to share these commitments.

We expect our Business Partners to:

- Comply with all applicable labor, wage and immigration laws, regulations and rules.
- Respect the human rights of their team members and contractors and treat them with dignity and respect and ensure that all work is voluntary.
- Provide team members and contractors with safe, secure and clean working and living conditions.
- Provide equal opportunity in the workplace.
- Respect team members' lawful rights of freedom of association.
- Encourage and enable team members to confidentially report concerns of unsafe, illegal or unethical practices without fear of reprisal.

Business Partners will not:

- Discriminate based on race, color, age, ancestry, citizenship, national origin, physical or mental disability, religion, medical condition (including pregnancy), political affiliation, marital status, gender, sexual orientation, gender identity, genetic information, veteran status, or any other status or characteristic protected by applicable law.
- Engage in harassment, abuse, bullying, retaliation or other forms of intimidation.
- Use, or otherwise enable, child, forced or involuntary labor, indentured labor, bonded labor, slave labor or human trafficking.

## Environment and Sustainability

Alltech is committed to protecting the environment, and sustainability is at the core of how we operate. We expect our Business Partners to strive to minimize their environmental footprint.

We expect our Business Partners to:

- Comply with all applicable environmental laws, regulations and operating permits.
- Safely handle, transport and dispose of hazardous materials in an environmentally responsible manner and in compliance with applicable laws.
- Minimize the environmental impact of their business operations and manage the natural resources on which we all depend in a responsible manner.
- Adopt measures to manage the discharge of solid waste, wastewater and air emissions in compliance with applicable laws.
- Comply with environmental reporting requirements with transparency and accuracy.
- Engage environmental regulators with integrity.
- Reduce, reuse and recycle materials whenever reasonably possible.

## Product Quality and Safety

Alltech is dedicated to providing safe, high-quality products and services, and our Business Partners are vital in helping us meet this commitment.

All Alltech facilities have in place the Alltech® Quality System (AQS). The AQS is designed in consideration of ISO Standards 9001, 22000 and 17025, the European Code of Practice for Feed Additive and Premixture Operators (FAMI-QS), Good Manufacturing Practices (GMP), Good Laboratory Practices (GLP), the American Feed Industry Association's Safe Feed/Safe Food Program (SF/SF), the Codex Alimentarius Guidelines on the implementation of the Hazard Analysis Critical Control Point (HACCP) system, and the requirements as put forth by the Food Safety Modernization Act (FSMA).

The AQS includes specific requirements for supplier and raw material approval. All suppliers are reviewed as a company through our supplier approval program as well as each raw material they supply. Each supplier is either physically, virtually or document audited based on risk by a member of the Alltech Quality Team. Each raw material is individually analyzed and assessed based on risk and quality requirements as set by internal product material specifications. The AQS is the controlling management system outlining the quality policies and procedures adhered to within each Alltech facility and the parameters by which each supplier must meet.

We expect our Business Partners to:

- Meet generally recognized or contractually agreed quality requirements to provide goods and services that consistently meet Alltech's needs, perform as warranted and are safe for their intended use.
- Promptly report quality issues or concerns or quality nonconformities that were detected after product/materials have shipped.
- Provide clear instructions and warnings on the appropriate labeling, handling, transportation, use and disposal of their products in compliance with all applicable laws and regulations.
- Employ appropriate quality audits.



## Ethics

Integrity is the core value at Alltech. We expect our Business Partners to conduct their business in a legal, ethical and fair manner and to operate in full compliance with all relevant legislation and the standards outlined in this Code.

We expect our Business Partners to:

- Comply with all applicable laws and regulations, including those relating to antibribery/corruption, anti-money laundering, antitrust and competition, boycotts, lobbying, payments to government officials, political donations and other related regulations.
- Only offer or provide gifts, travel, entertainment or other benefits to third parties on behalf of Alltech when such benefits are reasonable and infrequent, modest in price and appearance, and consistent with both this Code and applicable law.
- Avoid any interaction with Alltech team members that may conflict, or appear to conflict, with those team members' duty to act in the best interest of Alltech.
- Use humane procedures and sound animal husbandry practices designed to prevent the mistreatment of animals.
- Respect land rights of individuals, indigenous people and local communities affected by sourcing practices, supply chains and operations.
- Report any actual or perceived legal or ethical violations.

## Trade Compliance

Alltech conducts business in full compliance with all relevant export controls, sanctions and legislation. We expect a similar commitment from our Business Partners.

We expect our Business Partners to:

- For all applicable jurisdictions, comply with all applicable export controls, sanctions, antiboycott laws and customs regulations when exporting or importing goods or technology, and apply for and obtain all necessary authorizations and permits to ensure the timely and compliant delivery of products.
- Provide Alltech with all relevant trade-related information including, but not limited to, product classification details, country of origin and tariff classification to facilitate Alltech's full compliance with relevant export control, sanctions or customs legislation.

Business Partners will not:

- Provide to Alltech any product, material or service from a country, person or entity that is subject to regulations that restrict transactions with specific foreign entities, persons or countries (often referred to as denied, debarred and/or restricted parties).

## Responsible Sourcing

Alltech is committed to supply chain transparency, sustainability and ensuring inputs to our end products are ethically sourced. We expect Business Partners to take responsibility for sourcing their own materials in an ethical and environmentally sustainable manner, particularly in relation to materials sourced from high-risk and conflict-affected areas.

We expect our Business Partners to:

- Exercise due diligence in selecting their own suppliers and subcontractors to ensure responsible sourcing throughout the supply chain. In particular, suppliers shall not source raw materials or components from organizations or individuals engaged in or linked with illegal activities such as money laundering, terrorism or human rights abuses, including child labor, modern slavery and human trafficking.
- Monitor and perform appropriate due diligence on their own suppliers for risks of non-conformities to all the ethical, legal, environment and labor supply chain risks outlined in this Code.
- Comply with all applicable conflict minerals laws and international regulations.
- Permit Alltech to audit facilities supplying high-risk raw materials (e.g., soy, palm oil, cobalt) into its business.

## **Alltech Sites and Assets**

Alltech expects its Business Partners to ensure that their team members, contractors, subcontractors and agents conduct themselves in a manner consistent with the expectations of this Code, especially when working at Alltech locations and/or using Alltech assets.

When working at Alltech locations and/or using Alltech assets, Business Partners are expected to:

- Use Alltech assets and resources efficiently and for their intended business purpose.
- Follow the applicable law, standards, policies and procedures (including health and safety) for the Alltech site.
- Respect the privacy and personal data of those with whom they come in contact.

When working on Alltech sites, Business Partners will not:

- Work while impaired due to drugs or alcohol.
- Permit unauthorized access to Alltech sites.
- Display or share offensive, threatening or demeaning materials.
- Bring weapons into our workplace.
- Engage in behavior that may be considered harassment, discrimination, intimidation, bullying or otherwise may make others feel uncomfortable.

## Intellectual Property and Data Privacy

In certain cases, Alltech may provide valuable and/or sensitive intellectual property and business information to our Business Partners, which they are expected to protect with due care. In addition, Business Partners are to take appropriate steps to ensure data privacy.

We expect our Business Partners to:

- Take appropriate steps to protect Alltech's intellectual property and business information from theft, misuse or unauthorized access or disclosure.
- Respect Alltech's intellectual property rights and only use such intellectual property when appropriate authorization has been provided.
- Comply with applicable data privacy laws when collecting, using, storing, deleting and transferring or otherwise processing personal data.
- Advise Alltech of any changes to the way that personal data is used, handled or processed.

## Recordkeeping

Sound recordkeeping practices support transparency and decision-making. Alltech's Business Partners are expected to maintain internal controls to ensure that books and records relating to Alltech fully and objectively reflect the nature of the transactions.

We expect our Business Partners to:

- Create and manage business information for Alltech that is accurate, complete and in accordance with applicable laws, accounting rules and practices.
- Ensure that business information accurately reflects the underlying transaction or event.
- Ensure sale or purchase transactions conducted on behalf of Alltech are supported by a written contract (such as a vendor agreement or purchase order).
- Business Partners must Not falsify, alter, destroy or tamper with business information to misrepresent or conceal a transaction or event involving Alltech.

## **Marketing, Social Media and Communication**

One of Alltech's most valuable assets is its reputation, and we work hard to protect it. We expect our Business Partners will protect our reputation, as well as their own, when engaging with the public, whether that be via marketing, social media or other communication channels.

Business Partners who market or resell Alltech's products are expected to:

- Comply with all applicable product regulatory laws and contractual stipulations in relation to the advertising and marketing of Alltech products.

With respect to communication, Business Partners are expected to:

- Refer all media inquiries relating to Alltech to Alltech's Corporate Communications team ([press@alltech.com](mailto:press@alltech.com)).

Business Partners will not:

- Publicly communicate, market or advertise in any way that may be considered false, misleading or would otherwise damage Alltech's reputation.
- Reference Alltech or its products on social media platforms without appropriate authorization.
- Publicly disclose proprietary or other confidential information of Alltech without appropriate authorization.