



UNFI SUPPLIER AND VENDOR CODE OF CONDUCT

UNFI has established a set of four core values which inspire our approach to business and are fundamental to promoting our mission of transforming the world of food distribution for our associates, our customers, our suppliers, and the families we all serve every day.

- **Feed the planet.** Better food comes from a healthy planet, and we do our part.
- **Find the sweet spot.** Be flexible and make change work.
- **Do the right thing.** Put safety and integrity at the forefront of everything we do.
- **Deliver together.** Empower each other and win as a team.

UNFI intends to work with suppliers who share our same commitment to these values. Our Supplier and Vendor Code of Conduct (“Code”) sets forth our general expectations of suppliers and vendors (collectively, “Suppliers”) in keeping with these values, which we expect our Suppliers to read, understand, and honor.

ETHICAL AND LEGAL COMPLIANCE EXPECTATIONS

Anti-Bribery/Anti-Corruption: UNFI has a zero-tolerance policy for corruption, extortion, bribery, and/or any other unlawful, unethical, or fraudulent activity. Suppliers must not offer, give, promise, or authorize any improper payments of money or anything of value to government officials or employees, customers, UNFI associates, or any other persons for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage. Suppliers must comply with all applicable international anti-corruption laws and regulations that govern operations in the countries in which they do business, including the United States Foreign Corrupt Practices Act.

Conflicts of Interest: Suppliers must avoid any situation or relationship that may involve an inappropriate conflict of interest or the appearance of a conflict of interest in their dealings with UNFI. This includes any conduct likely, intending, or appearing to improperly influence any UNFI associate in the performance of his or her job, such as offering or providing cash payments, gifts, personal travel expenses, lodging or other housing, or excessive meals or entertainment to UNFI associates or their family members. See [UNFI’s Code of Conduct](#) or contact UNFI’s Ethics & Compliance Office at 952-828-4230 if there are questions about what is acceptable.

Compliance with Laws and Contracts: At a minimum, Suppliers must perform all duties in compliance with all laws and regulations applicable to their business and comply with all terms, conditions, and other provisions specified in any contract or purchase order with UNFI. When transacting business across international borders, or if a Supplier’s primary place of business is located outside the United States, Suppliers must comply with applicable local laws and regulations. All products supplied to UNFI must be safe, high-quality, of excellent value, and fully compliant with applicable laws, regulations, and

standards, including product and food safety and global trade laws governing country of origin, importation, customs entry, export controls, and licensing.

Fair Competition/Anti-Trust: Suppliers must comply with all applicable anti-trust or anti-competition laws and regulations that govern the jurisdictions in which they conduct business.

Financial Responsibility/Accurate Records: Suppliers must accurately prepare, maintain, and report all business documentation required in the jurisdictions in which they conduct business. UNFI expects Suppliers to keep all records related to their business with UNFI in accordance with standard accounting practices such as Generally Accepted Accounting Principles (GAAP) or International Financial Reporting Standards (IFRS).

Insider trading: Suppliers are prohibited from engaging in insider trading, including buying, selling, or taking any futures position in UNFI's stock while in possession of information about our company that is not generally available to the investing public and that could influence an investor's decision to buy or sell stock.

Intellectual Property: Suppliers may only use UNFI's trade information, copyrights, and trademarks in a manner that is permitted under their contracts with UNFI and may not misappropriate or infringe upon the trade information, trademarks, or copyrighted works of others.

Social/Environmental Responsibility: Suppliers must operate in a manner that complies with all applicable environmental laws and regulations and work to actively manage risk, conserve natural resources, promote animal welfare, and protect the environment. Suppliers are expected to serve as good stewards in society and in their communities. UNFI also expects suppliers to continuously monitor, evaluate and improve social and environmental performance, particularly in the areas of:

- Greenhouse gas emissions reduction
- Energy efficiency and renewable sources
- Water stewardship and wastewater management
- Management of waste and hazardous materials
- Responsible sourcing practices
- Animal welfare

Supplier Diversity: It is UNFI's practice to seek out and provide sourcing opportunities to Minority, Women, Veteran, LGBTQ and Service-Disabled Veteran owned businesses. Suppliers are expected to promote diversity and inclusion in their workforce and throughout their own supply chains and may be asked to document the use of these diverse suppliers and vendors.

Technical Security/Privacy: Suppliers must comply with applicable security and privacy laws and regulations and ensure that they have appropriate technical and security controls in place to protect UNFI's confidential information.

LABOR AND WORKPLACE SAFETY EXPECTATIONS

Child Labor: Suppliers or their subcontractors shall not use child labor. Child labor is defined for these purposes as any person employed at an age younger than the legal minimum age for working in any specific jurisdiction.

Compensation: Suppliers will compensate their employees with wages and benefits which comply with the applicable laws and regulations of the jurisdictions in which they do business.

Discrimination/Rights: Suppliers must treat all employees with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture and a workplace that is free from harassment. Suppliers will not discriminate on the basis of race, color, national origin, gender, religion, disability, sexual orientation, age, and other similar factors in their employment practices.

Forced Labor and Human Trafficking: All labor directed to produce the products and/or perform the services purchased by UNFI from suppliers must be voluntary. Slave, forced, bonded, prison, or indentured labor will not be tolerated. Suppliers shall not engage in or support trafficking in human beings. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation. Suppliers shall make best efforts to mitigate the risks of human trafficking and slavery in their supply chain, to include, where appropriate, auditing their supply chain

Hours of Labor: Suppliers must ensure that working hours are consistent with local laws and regulations. If such laws or regulations do not address standard working hours, suppliers must ensure that work hours are not excessive or unfair.

Workplace Health/Safety: Suppliers must provide employees a safe, hygienic, and healthy work environment which complies with all applicable laws and regulations. Suppliers must take proactive measures to prevent workplace and health hazards and exposures, including providing employees appropriate safety equipment and training.

PROCEDURAL AND ADMINISTRATIVE EXPECTATIONS

Applicability: This Code applies to all Suppliers.

Certification: Suppliers are required, as a condition of maintaining an active business relationship with us, to periodically acknowledge their compliance and obligation to comply with this Code.

Compliance: Upon discovery of noncompliance, UNFI will take any steps it deems necessary or advisable considering the nature of noncompliance, including discontinuing our relationship with any Supplier that does not comply with this Code or does not commit to a specific plan to achieve compliance.

Reporting Suspected Violations: We expect our Suppliers to follow the law and the information in this Code and to promptly report any actual or suspected violations, including violations by any UNFI associate or individual acting on behalf of UNFI or one of our Suppliers. Suspected violations of this Code may be reported to UNFI's Ethics & Compliance Office by telephone at 952-828-4230, email at ethics.compliance@unfi.com, or mail at: Ethics & Compliance Office, 313 Iron Horse Way, Providence, RI 02908. All reported violations that include specific information will be investigated and appropriate action will be taken.