	Supplier Code of Conduct			Page 1 of 4
	Doc #: Internal Document	Supersedes: October 23, 2024	Revised: October 29, 2024	Version: V2
	Created By: Dawn Langhoff	Reviewed By: Fresh Avila; Steve Block		Scheduled Annual Review Date: October 29, 2025

Purpose:


GBC Food Services (the “Company” or “GBC”) is founded on the principles of honesty, accountability, integrity, and fostering quality relationships with our associates, stakeholders, customers, suppliers, and communities. To uphold these high standards, GBC requires each of its suppliers to provide goods and services that adhere to this Supplier Code of Conduct.

Scope

This code applies to all suppliers of goods or services to GBC Food Services LLC (dba Yummi Sushi, Supreme Service Solutions, Supreme Deli, Supreme Produce, Yummi Go Gourmet).

A. Legal Requirements:

1. Suppliers must follow all national, state, or regional, and local laws and regulations in the countries in which you operate including:
 - i. Trade – follow all trade controls, export & re-export, and import laws and regulations.
 - ii. Antitrust – conduct business in compliance with antitrust and fair competition laws that apply to your business.
 - iii. Boycotts – not participate in international boycotts that are not sanctioned by the United States government or applicable laws.
 - iv. Anti-Corruption:
 - a. No tolerance for bribery: No employee or associated person shall engage in any form of bribery, either directly or through any third party. This applies to offering, promising, giving, accepting, or soliciting anything of value to influence the actions of another party.
 - b. Gifts and Hospitality: Gifts and hospitality may only be offered to or accepted from third parties if they are not intended to influence a business decision, are consistent with customary business practice, are modest in value, and are transparently recorded. Set clear monetary thresholds and require prior approval for any gifts or hospitality above those thresholds.
 - c. Due Diligence: Supplier will conduct thorough due diligence on all potential suppliers, contractors, and partners to ensure they comply with the organization’s anti-bribery standards. Assessments should review the third party’s own anti-bribery policies and past conduct.
 - d. Transparent Procurement Process: All procurement processes must be conducted transparently to ensure fair competition and clear accountability. Document and publicly post all tender processes, criteria for decision-making, and contract awards.
 - e. Conflict of Interest: Employees of the supplier must disclose any conflicts of interest that may influence their procurement decisions for raw materials purchased. Supplier will require written disclosure of potential conflicts and take appropriate steps to manage any identified conflicts.
 - f. Accurate Record Keeping: Maintain accurate and detailed records of all procurement transactions, including bids, evaluations,

	Supplier Code of Conduct			Page 2 of 4
	Doc #: Internal Document	Supersedes: October 23, 2024	Revised: October 29, 2024	Version: V2
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approvals, and rationales for decisions. Ensure that all procurement activities can be audited and reviewed for compliance by a 3rd party or GBC representative.


- g. Reporting Mechanism: Establish secure and confidential channels for reporting suspected bribery or unethical behavior in the procurement process. Ensure that whistleblowers are protected from retaliation in line with the supplier organizational policies and laws.
 - h. Regular Training: Provide regular training on anti-bribery laws and supplier organizational policies to all employees involved in procurement. Training should emphasize the importance of ethical conduct and the consequences of non-compliance.
 - i. Regular Monitoring Compliance: Regularly monitor compliance and conduct audits to detect any irregularities or breaches of the anti-bribery rules. Implement corrective actions and, if necessary, disciplinary measures for non-compliance.
 - j. Legal Compliance: Adhere to all applicable local and international anti-bribery laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA). Ensure that all procurement activities are consistent with legal requirements and ethical standards.
- v. Failure of supplier to maintain confidentiality of all supply agreements could result the supplier being terminated as a supplier by GBC. Confidentiality will be maintained for (including but not limited to):
- a. Supplier Contracts
 - b. Supplier Specifications (if applicable)
 - c. Pricing
 - d. Market Allowances
 - e. GBC Product Specifications
 - f. GBC Customer Information

B. Ethical Requirements:

- 1. Suppliers will not give or receive gifts from GBC officers, directors, or associates or suppliers in exchange for business opportunities.
- 2. Suppliers will have a “no retaliation policy” that allows Supplier’s employees to speak with GBC associates without fear of retaliation by Supplier management.
- 3. Suppliers will notify GBC of any potential conflicts of interest that come up from personal or business relationships with GBC, GBC customers, franchisees, GBC associates or competitors.

C. Labor Requirements:

- 1. Human rights: Suppliers will not violate basic human rights.
 - a. All human beings are born free and equal in dignity and rights.

	Supplier Code of Conduct			Page 3 of 4
	Doc #: Internal Document	Supersedes: October 23, 2024	Revised: October 29, 2024	Version: V2
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- b. All employees shall be treated equally without bias regarding race, color, sex, gender, language, religion, political or other opinion, national or social origin, property, birth, or other status.
- 2. Child Labor: all supplier employees will be of legal age established by local law. If the local law does not set a minimum age, supplier employees must be at least 14years of age. The exception to this requirement is if there are legitimate workplace apprenticeship programs, which comply with all laws and regulations.
- 3. Freedom of Association: Suppliers will agree to allow their employees to freely associate and organize and to legally bargain collectively.
- 4. Forced Labor: GBC will not tolerate any practice of forced, bonded, indentured, slave or trafficked labor or the use of any physical or mental coercion.
- 5. Foreign or Migrant Workers: If suppliers utilize migrant or foreign workers, they must follow the labor and immigration laws of the host country.
- 6. Wages & Benefits: Suppliers will comply with all legal employment and labor requirements, including those related to minimum wage and overtime. In countries with a set maximum work week, Suppliers will comply with these requirements. GBC reserved the right to request payroll records (with confidential information redacted) at any time.
- 7. Health & Safety: GBC requires that facilities where goods are produced or held will be a safe and healthy work environment for all employees.


D. Environmental Stewardship: Suppliers to GBC will operate and be responsible for the environments impacted by the facility taking into account local waterways, produce growth and emissions.

- 1. Responsibly sourced seafood: high-quality, traceable, and sourced via responsible investing where our suppliers are engaging in sustainable practices such as environmental stewardship.
- 2. GBC will never knowingly purchase illegally caught seafood. GBC will not purchase from any supplier that sources from IUU (illegal, unregulated, or unreported) fisheries. Suppliers must follow all federal and applicable international laws regarding procurement, labeling and traceability. Suppliers must source from sustainable resources based on GSSI standards**.

**GSSI (Global Seafood Sustainability Initiative) - A private organization working as a coalition to standardize sustainability practices in the seafood industry, multiple organizations and certifications are a part of the coalition to meet the varieties of fishery practices.

E. Monitoring & Enforcement: Suppliers must allow GBC representatives unrestricted access to manufacturing facilities, sorting locations and warehouse storage areas and to any relevant records at any time, without advance notice, to monitor ongoing compliance with this Supplier Code of Conduct. GBC will commit to complying with supplier reasonable safety rules while visiting the facilities.

F. Violations of this Code of Conduct: Suppliers found to be in in violation of this Code of

	Supplier Code of Conduct			Page 4 of 4
	Doc #: Internal Document	Supersedes: October 23, 2024	Revised: October 29, 2024	Version: V2
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Conduct may either be terminated as a supplier to GBC or GBC may require the affected facility to implement a corrective action plan to be brought back into compliance.