

# HEINLEIN FOODS USA

## Code of Conduct

*Ethical Trading & Responsible Business Practices*

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### Our Commitment

Heinlein Foods USA is a SQF-certified frozen dessert manufacturer based in South Florida. We are committed to conducting business responsibly and ethically across our own operations and throughout our supply chain. This Code of Conduct is aligned with the Sedex Members Ethical Trade Audit (SMETA) four-pillar framework and is grounded in the Ethical Trading Initiative (ETI) Base Code, the International Labour Organization (ILO) core conventions, and the United Nations Guiding Principles on Business and Human Rights.

This Code applies to all Heinlein Foods USA employees, as well as to the suppliers, subcontractors, and business partners with whom we work. We expect our partners to uphold these standards and to extend them within their own supply chains.

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### 1. Labour Standards

**Freely Chosen Employment.** We prohibit all forms of forced, bonded, or compulsory labour, including modern slavery and human trafficking. No worker shall be required to surrender identity documents or pay recruitment fees as a condition of employment. All employment at Heinlein Foods USA is freely chosen, and workers are free to leave upon reasonable notice.

**Child Labour.** We do not employ anyone below the legal working age. All employees are verified through E-Verify and I-9 documentation. We comply fully with all applicable federal and Florida state laws regarding minimum age of employment.

**Fair Wages and Benefits.** We pay above the applicable minimum wage and are actively working toward a living wage commitment for all employees. Wages are paid regularly, on time, and with clear, written documentation. Deductions from wages are never used as a disciplinary measure.

**Working Hours.** Standard working hours are 40 hours per week. Overtime is entirely voluntary and is compensated in accordance with applicable law. We do not require excessive overtime and ensure that all workers receive adequate rest periods.

**Freedom of Association.** We respect the right of all workers to form and join trade unions, to bargain collectively, and to assemble freely. Where these rights are restricted by local law, we facilitate parallel means of independent association and negotiation. No worker shall face retaliation for exercising these rights.

**Non-Discrimination.** We are an equal opportunity employer. No worker shall face discrimination in hiring, compensation, training, promotion, termination, or any other employment practice on the basis of race, colour, sex, gender identity, sexual orientation, religion, national origin, age, disability, marital status, or any other protected characteristic.

**Respectful Treatment.** Physical abuse, threats of violence, harassment, intimidation, or any other form of inhumane treatment is strictly prohibited. All disciplinary procedures are fair, transparent, and documented.

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### 2. Health and Safety

Heinlein Foods USA is committed to providing a safe and healthy working environment for all employees, contractors, and visitors. We maintain emergency preparedness plans and conduct regular emergency drills including fire evacuation, chemical spill response, and related scenarios.

We ensure safe operation of all refrigeration and production equipment, provide appropriate personal protective equipment (PPE), and maintain clean and sanitary facilities consistent with both our SQF food safety certification and applicable OSHA requirements. Workers receive health and safety training in both English and Spanish to ensure comprehension across our workforce.

We are committed to continually improving our health and safety practices by developing a formal health and safety management system, conducting regular risk assessments, and maintaining open communication channels for workers to report hazards without fear of retaliation.

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### 3. Environment

We recognise our responsibility to minimise the environmental impact of our manufacturing operations. Heinlein Foods USA operates with the following commitments:

**Waste Management.** We maintain documented waste management and recycling procedures covering packaging materials, ingredient waste, and production by-products. We seek to reduce waste generation and increase recycling and diversion rates over time.

**Water and Wastewater.** All production wastewater undergoes pretreatment before discharge to municipal systems, ensuring compliance with all local and federal water quality standards. We are pursuing initiatives to reduce overall water consumption in our production processes.

**Energy and Emissions.** We are working to formalise our environmental sustainability programme, including tracking and reducing energy consumption and greenhouse gas emissions. We operate freon-based refrigeration systems in compliance with EPA regulations and are committed to responsible refrigerant management.

**Continuous Improvement.** We are committed to developing a formal environmental management programme with measurable targets for waste reduction, water conservation, and energy efficiency.

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### 4. Business Ethics

**Anti-Bribery and Anti-Corruption.** Heinlein Foods USA maintains a formal anti-bribery and anti-corruption policy. We prohibit all forms of bribery, corruption, extortion, and embezzlement. No employee or business partner shall offer or accept bribes, kickbacks, or improper payments of any kind.

**Ethical Supply Chain.** We conduct due diligence on our suppliers and subcontractors to assess their ethical, labour, and environmental practices. We expect our supply chain partners to meet the standards set out in this Code and to demonstrate continuous improvement.

**Data Privacy and Protection.** We maintain formal data protection policies to safeguard the personal information of our employees, customers, and business partners in compliance with all applicable privacy laws and regulations.

**Transparency and Reporting.** We are committed to honest and transparent business dealings. Financial records and business information are maintained accurately and in good faith.

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### Raising Concerns

Heinlein Foods USA maintains a formal confidential grievance mechanism through which employees and external stakeholders can report concerns related to any aspect of this Code of Conduct. Reports can be

made without fear of retaliation, and all concerns are investigated promptly and fairly. Our grievance procedures are communicated to all employees in both English and Spanish.

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## **Governance and Review**

This Code of Conduct is reviewed annually and updated as necessary to reflect changes in legislation, best practice, and stakeholder expectations. Heinlein Foods USA undergoes regular SMETA four-pillar audits through Sedex and maintains SQF certification for food safety. Senior management is responsible for the implementation and enforcement of this Code.

Heinlein Foods USA • South Florida

Effective Date: April 2026 • Review Date: April 2027

*Aligned with: ETI Base Code • ILO Core Conventions • UN Guiding Principles on Business & Human Rights*