



# Flowers Foods Supplier Code of Conduct

## Introduction

At Flowers Foods, we recognize our responsibility to uphold the company's founding values, which for more than 100 years have centered on working ethically, responsibly, and with integrity. We actively seek opportunities to make a positive difference for our team, consumers, environment, and the communities we serve, and our suppliers play a critical role in the success of these efforts.

The *Flowers Foods Supplier Code of Conduct* (this "code") outlines the principles and ethical standards that we expect our suppliers to follow. We ask each of our suppliers to take reasonable steps to ensure that this code is communicated throughout their organization and to make this code available to their employees and suppliers. This code supplements, but does not supersede, any rights or obligations established in any agreement we may have with any supplier.

Working together with our suppliers, as responsible members of the corporate community, we believe that we can achieve mutual success and make a positive difference for our team, consumers, environment, and the communities we serve.

### **Ryals McMullian**

Chairman and Chief Executive Officer  
Flowers Foods, Inc.

### **Eric Mathis**

Senior Vice President & Chief Procurement Officer  
Flowers Foods, Inc.

## Scope

This Code applies to Flowers Foods' independent contractors who provide various goods and services to Flowers Foods and its subsidiaries, including suppliers, vendors, contractors, consultants, and their employees, agents, and subcontractors (collectively referred to herein as "suppliers").

## Legal Compliance

We expect our suppliers to conduct their business in full compliance with all applicable laws, rules, and regulations. Flowers Foods reserves the right to decline future business opportunities or to end existing business relationships with suppliers who fail to do so.

## Ethical Behavior

At Flowers Foods, our values are honesty and integrity, respect and inclusion, sustainability, passion, and humility. These values guide the daily actions of our company and all our team members. We build business relationships based on honesty, fairness, and ethical practices, and prefer to work with suppliers who also have a strong commitment to ethical behavior. We expect our suppliers to follow high ethical standards and to conduct their business in a fair, legal, and honest manner.

## Labor and Human Rights

Flowers Foods is committed to treating all team members and associates fairly and with respect, and we have policies and procedures in place to ensure fair labor practices. We expect our suppliers to make the same commitment to fair labor practices and to have controls in place that verify employment eligibility of their employees, the right of employees to freely associate, compliance with applicable wage and hour laws, and zero tolerance for discrimination, harassment, forced labor, child labor, human trafficking, and slavery.

## Food Safety and Product Quality

Our reputation rests on the quality, safety, and purity of our bakery foods. We take food safety and product quality very seriously and strive to produce foods that meet the highest standards of our industry. We expect our suppliers to provide us with products and services that comply with all federal, state, and local laws and all government and company food safety regulations, requirements, and specifications.



## **Team Member Health & Safety**

The health and safety of team members is of paramount concern for Flowers Foods and we strive to provide a workplace that is free of preventable hazards and that complies with all workplace safety and health laws. We expect suppliers to comply with all applicable health and safety laws, regulations, and standards, as well.

## **Sustainability**

Flowers Foods recognizes that a healthy environment is a necessary condition for our success. We are committed to applying the principles of sustainability to all aspects of our business, to encouraging our team members to accept responsibility for conserving natural resources and improving the company's use of those resources, and to conducting our affairs in accordance with environmental laws. We seek to work with suppliers that share our commitment to sustainable business practices and comply with all applicable environmental laws.

## **Confidentiality & Privacy**

Suppliers with access to confidential information from Flowers Foods should protect such information and ensure that no such information is disclosed to any other person or organization without our advance written consent. Confidential information includes, but is not limited to, product formulas and pricing, production technologies and processes, engineering and technical designs, production and supply costs, operating systems and practices, and trade customer information.

Suppliers handling personal and confidential information about Flowers Foods' team members, such as home addresses, social security numbers, birth dates, and medical information, must have appropriate procedures in place to ensure this information is protected against unauthorized disclosure and theft. Suppliers must report any actual or possible unauthorized disclosure of Flowers Foods' company or team member information immediately to Flowers Foods' Ethics Officer ([ethicsofficer@flocorp.com](mailto:ethicsofficer@flocorp.com) or Ethics Officer, P. O. Box 6201, Thomasville, GA 31758).

## **Conflicts of Interest**

Suppliers must ensure their personnel and the personnel of any subcontractors working on projects for Flowers Foods have no direct or indirect conflict with Flowers Foods' business interests. We require suppliers to notify us of any potential conflict of interest associated with financial interests, prior employment, or family employment by contacting Flowers Foods' Ethics Officer ([ethicsofficer@flocorp.com](mailto:ethicsofficer@flocorp.com) or Ethics Officer, P. O. Box 6201, Thomasville, GA 31758). Suppliers who attempt to recruit Flowers Foods' team members for employment may create conflicts of interest and concerns about confidentiality that can damage the trust necessary for a successful business relationship.

## **Gifts**

Flowers Foods team members and their immediate families are not permitted to accept gifts or benefits (except of a nominal value) from any supplier or any third-party desiring a business relationship with Flowers Foods. Such exchanges can be interpreted as a conflict of interest and detract from the integrity of any existing or future business relationship. Therefore, we expect that suppliers will not offer or give any gifts, payments, or other benefits (except of a nominal value) to Flowers Foods team members that may influence any business decision or appear to do so.

## **Anticorruption & Antibribery**

Flowers Foods is committed to full compliance with all applicable anticorruption and antibribery laws, including the U.S. Foreign Corrupt Practices Act. We expect that our suppliers will comply with all applicable anticorruption and antibribery laws and that they will not directly or indirectly provide, promise, or offer any payments, gifts, or other items of value in exchange for an improper business advantage. Suppliers should have controls in place to prohibit and detect corruption, bribery, improper payments, or other benefits, extortion, and embezzlement.

## **Antitrust & Fair Business Practices**

Flowers Foods is committed to full compliance with both the letter and spirit of all applicable antitrust and fair competition



laws. Although complex, these laws generally prohibit agreements or actions that may reduce competition without benefitting consumers. For example, federal antitrust laws prohibit agreements or understandings among competitors to fix or control prices; to boycott specified suppliers or customers; to allocate products, territories, or markets; or to limit the production or sale of products or product lines. We expect our suppliers to comply with all applicable antitrust and fair competition laws.

### **International Trade Compliance**

We expect our suppliers to comply with all applicable economic sanctions, export control, and anti-boycott laws, regulations, orders, designations, licenses, and relevant directives. Suppliers should have policies, procedures, and other controls in place to ensure compliance with these provisions.

### **Recordkeeping**

We expect suppliers to maintain financial records and accounts in accordance with applicable regulatory requirements and generally accepted accounting principles, including documentation related to food safety and traceability.

### **Audits, Inspections & Information Requests**

We expect our suppliers to conduct audits and inspections to ensure their compliance with this code and to cooperate with our requests for information, certifications, inspections, and audits. We reserve the right to conduct unannounced audits and inspections of suppliers and their facilities to verify compliance with this code. Failure to comply with any such audits or inspections may result in termination of the business relationship.

### **Reporting Concerns**

Suppliers and their employees should promptly report any potential violations of this code by a supplier and any unethical behavior or misconduct by an employee or representative of Flowers Foods. You may raise a concern by:

- Contacting your Flowers Foods' representative or the Flowers Foods' Ethics Officer ([ethicsofficer@flocorp.com](mailto:ethicsofficer@flocorp.com) or Ethics Officer, P. O. Box 6201, Thomasville, GA 31758); or
- Calling Flowers Foods' ethics hotline at 1.888.337.7524. This 24/7 hotline is staffed by an independent company. Supplier personnel calling the hotline may request anonymity, but are strongly encouraged to provide enough information so any allegations can be investigated.

Raising concerns quickly helps to prevent problems and correct any issues that have already occurred. While Flowers Foods will do everything possible to protect the identity of any supplier personnel, if so requested, Flowers Foods reserves the right to disclose information internally and externally as appropriate and necessary in the context of any investigation.

### **Compliance**

We endeavor to build trust-based relationships with ethical suppliers who follow this code. When concerns are identified, our practice is to work with our suppliers to address the concern and identify improvements. When an issue cannot be corrected or a supplier is unwilling to engage, we reserve the right to end our relationship.

### **Online Version**

A link to *Flowers Foods Supplier Code of Conduct* is posted in English and Spanish on the home page of [flowersfoods.com](http://flowersfoods.com).