

# **John B. Sanfilippo & Son, Inc.**

## **Human Rights Policy**

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John B. Sanfilippo & Son, Inc. (“JBSS”) has a long history of committing to the implementation of high ethical standards in all aspects of its operations. At JBSS, our vision is to be a trusted partner for all our stakeholders, which is why integrity is one of our core values. We achieve this vision by balancing our strong desire for profitable growth with our commitments to employees, shareholders, and consumers. One of those commitments is acknowledging that all individuals should be treated with dignity and fairness. By upholding fundamental human rights principles, we aim to drive broader change in the communities we serve and create an inclusive and safe environment for our employees. We are committed to adhering to internationally recognized human rights and principles, including those principles reflected in the United Nations Universal Declaration of Human Rights, and require our suppliers to adhere to International Labor Standards outlined in our Supplier Code of Conduct.

### **Community Commitment**

As a food manufacturer, JBSS has a unique opportunity to impact human rights, like food insecurity, in the communities we serve. Whether by donating our time, our profit, or our products, we recognize the importance of community outreach and are committed to continuing to establish meaningful social responsibility programs to make impactful measurable differences for those communities. Our Corporate Responsibility Committee, a cross functional team of JBSS employees, prioritizes the well-being of people and the planet to create meaningful sustainable programs that benefit our stakeholders. Through long term partnerships with local and international farmers and growers, JBSS has developed a communication pipeline where it can actively solicit guidance on evolving issues in the industry while sharing and receiving feedback to its innovative solutions to create long lasting change. By being an active member of many commodity, packaging, and manufacturing advisory boards, we have the opportunity to collaborate with industry experts on best practices to meet our corporate responsibility goals. JBSS is committed to continuing to engage our stakeholders to understand how to best meet their expectations regarding protecting the environment, ensuring the well-being of our employees, and upholding high ethical standards in our business dealings.

JBSS is passionate about providing real food that brings joy, nourishes people, and protects the planet. We mandate strict compliance with food safety standards and other government regulations designed to protect against injuries related to food consumption. JBSS is committed to annually testing for many types of pesticides, heavy metals, and mycotoxins found in our ingredients at the beginning of every crop year. Our plants are Safe Quality Food (SQF) certified and we have implemented a robust pathogen program to ensure our customers are receiving the product they expect and trust. While JBSS complies with all labeling regulations and administrative guidance of the Federal Trade Commission and United States Food and Drug Administration, we also strive to educate our consumers of the health benefits of nuts as well as the versatility of nuts as both a snack and recipe ingredient by participating in trade associations, funding industry research, publishing information on our websites, and sponsoring education programs. We also manufacture trail mixes and snack bars that are designed to give our customers and their families options in their snacking choices that range from healthy to decadent.

### **Employee Commitment**

JBSS is committed to maintaining and promoting diversity and inclusion to create a culture where differences are celebrated. We recognize that our business is stronger and more successful when supported

by a diverse workforce. Our Diversity, Equity, and Inclusion Council (“Council”) is tasked with overseeing and enhancing these employee initiatives. Through regular communication with our employee resource groups, the Council provides resources and training to our employees, as well as advises management as to opportunities to enrich our diversity and inclusion initiatives. To further these efforts of the Council, management has implemented equity training for every leader across the entire organization to promote inclusivity and equity throughout the workplace. Additionally, JBSS regularly surveys our employees to receive feedback on areas in need of improvement and opportunities to provide additional support.

We are an equal opportunity employer for all individuals. We do not discriminate against individuals on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, pregnancy, marital status, disability, veteran status, or any other characteristic protected by applicable federal, state, or local law. We prohibit any type of harassment and discrimination and annually train our employees on preventing harassment and discrimination in the workplace. JBSS also prohibits the exploitation of children or use of children as workers, forced labor, or human trafficking of any sort. We comply with all applicable state and federal laws with respect to wage and hour laws, including those related to minimum wages, overtime hours, maximum hours worked per day or per week, and other elements of compensation or legally mandated benefits. We respect our employee’s rights to freedom of association and collective bargaining. Our Employee Code of Conduct sets forth the standards of conduct and is used as a tool to assist all employees in successfully meeting JBSS’ high ethical standards. The Employee Code of Conduct is intended to create and maintain an atmosphere and culture of honesty and integrity.

JBSS is also committed to equal pay for equal work in compliance with all federal, state, and local laws, including Title VII of the Civil Rights Act, the Equal Pay Act of 1963, the Equal Wage Act, and the Equal Pay Act of 2003. JBSS prohibits any pay decision based on gender, race, ethnicity or any other unlawful basis. Our commitments to pay equity is memorialized in our employee policies as well as through our submittals of pay data to be certified as an equal pay employer.

The health and safety of our employees is a priority for JBSS. We train our employees on proper manufacturing practices as well as OSHA regulations and best practices. We continually assess our plants to identify ways to better our processes to prevent injuries. All employees are responsible for ensuring their work environment is safe and to report any unsafe or hazardous conditions immediately. It is equally the duty of each leader at JBSS to make the safety of their employees an integral part of their daily function.

Failure of any JBSS employee to adhere to this policy, the Code of Conduct, or any other JBSS policy may result in disciplinary action, up to and including termination.

### **Supply Chain Commitment**

JBSS is committed to mitigating salient human rights risks outlined in this policy and continuing its efforts to govern our supply chain’s fair and equal treatment of all individuals. As a prerequisite for doing business with JBSS, every vendor and supplier must agree to comply with our Supplier Code of Conduct and our Supplier and Co-Manufacturing Quality Expectations Manual. Within these published documents, JBSS articulates clear expectations related to compliance, fair labor practices, and sustainable operations. We strictly prohibit our vendors and suppliers from engaging in any trafficking-related activities, slavery, or use of child labor. We mandate our supply chain respect the freedom of association and collective bargaining, provide safe and inclusive environments for their employees, and comply with all applicable laws, domestic and international, pertaining to wages, work hours, overtime, and benefits. To further this commitment, we train all employees, including those responsible for supply chain management, on the subject matters like human trafficking, smuggling, harassment, and discrimination to equip our employees

with the necessary knowledge and skills to support our commitment to protecting human rights.

JBSS is committed to adhering to all anti-corruption and anti-money laundering laws and require our supply chain to refuse any type of offers, promises, gifts, or anything of value to gain an improper business advantage. JBSS mandates that suppliers must never engage in bribery, fraud, embezzlement, extortion, or any other form of corruption and maintain compliance with applicable anti-corruption laws including the U.S. Foreign Corrupt Practices Act.

Failure of any vendor or supplier to comply with this policy, our Supplier Code of Conduct, or our Supplier and Co-Manufacturing Quality Expectations Manual may be result in their contract being terminated.

### **Compliance Commitment**

JBSS conducts business in accordance with all applicable laws and regulations. However, mere compliance does not encompass our entire ethical responsibility, but rather it defines the minimum standards of our performance. Our Board of Directors and its committees are responsible for the oversight of this policy and receive regular updates regarding our initiatives in our communities, commitments to ensuring our employees have a safe and inclusive environment to work in, and our governance of our supply chain expectations.

As part of our commitment to act with integrity, we require all employees and our supply chain to report any known or suspected violations of this policy, our Code of Conduct, the Supplier Code of Conduct, the Co-Manufacturing Quality Expectations Manual, or any violation of laws, rules, regulations, or other policies that apply to JBSS. JBSS is committed to ensuring that we are not complicit in any violation of human rights, domestic or international. JBSS has formal protocols for stakeholders to report potential violations, including our confidential and anonymous EthicsPoint phone line and website, or by contacting our Internal Audit Department. No reprisal or retaliatory action will be taken against any employee, vendor, or supplier for reporting violations in good faith.

Aside from financial penalties, violation of human rights, including trafficking, would undermine the JBSS vision to be our stakeholder's trusted partner. Thus, in addition to mandating compliance with our policies and all applicable laws, we aim to heighten the awareness of human rights issues with our supply chain partners by providing them with additional information on how to detect, and prevent human trafficking as well as steps to take to report such unethical activity to the Department of Homeland Security.

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