



# SUPPLIER CODE OF CONDUCT

**Post Holdings, Inc. and its subsidiaries (“Post”) are committed to conducting business ethically, responsibly and in accordance with all applicable laws and regulations. We strive to exhibit the highest standards of integrity and fairness in everything we do, including the selection of suppliers. This Supplier Code of Conduct (“Code”) sets out the minimum expectations for doing business with us.**

## **LEGAL COMPLIANCE & BUSINESS ETHICS**

Every supplier must engage in responsible and ethical business practices and conduct itself in full compliance with all applicable laws, rules, and regulations in every country in which it does business.

## **FAIR LABOR PRACTICES**

We are committed to observing fair labor practices and to treating employees with dignity and respect. Suppliers must:

- Provide workers with clean, safe and healthy work environments;
- Recognize and respect the right of employees to free association and collective bargaining in accordance with law;
- Comply with all applicable wage and hour laws; and
- Properly verify the employment eligibility of employees.

## **FORCED LABOR**

We do not tolerate the use of forced labor of any kind. Suppliers may not employ, use or otherwise benefit from involuntary labor, forced labor, or labor that results from slavery or human trafficking. By engaging in business with us, you are certifying that: (i) you are in compliance with this paragraph; and (ii) all materials incorporated into your product comply with all applicable laws addressing slavery, human trafficking and other forms of forced labor. We may seek confirmation of compliance with this paragraph at any time.

## **CHILD LABOR**

We recognize the importance of laws protecting children from unsafe or inappropriate working schedules and environments. Suppliers shall not employ anyone under the legal working age defined by local law. Suppliers must also strictly comply with all applicable laws addressing the working requirements and conditions for child workers.

## **RESPECTFUL WORKPLACE**

Everyone has the right to work in a respectful atmosphere that is free of harassment. Suppliers must prohibit all forms of unlawful discrimination, abuse, harassment, violence and retaliation.

## **PRODUCT SAFETY AND QUALITY**

The commitment to producing safe and high quality food is of paramount importance to Post. Suppliers have heightened responsibilities when dealing with products that are intended for human consumption or that come into contact with food for human consumption. Every Post supplier shall comply with all food quality and safety laws, including all applicable provisions of the Food Safety Modernization Act, and shall ensure that its products present no threat to health or human safety.

## **GIFTS AND ENTERTAINMENT**

We prohibit all gifts and entertainment that might appear to compromise independent judgment. Suppliers may never offer a gift to a Post employee that is: (i) more than a nominal value; (ii) more than an infrequent occurrence; (iii) cash or cash equivalents; or (iv) illegal, sexually oriented, offensive or otherwise inappropriate.

## **ENVIRONMENT & SUSTAINABILITY**

We endeavor to conduct our business in a sustainable and environmentally responsible manner. At a minimum, our suppliers must:

- Comply with all applicable environmental laws and reporting obligations;
- Maintain all required permits; and
- Strive to responsibly manage the impacts of their operations on the environment.

## **ANTI-CORRUPTION**

Our suppliers must avoid corruption in any form and comply with the anti-corruption laws in every country in which they operate. Suppliers shall not, directly or indirectly, offer improper gifts to government employees, engage in bribery or fraud, or take any other action that would cause a violation of the U.S. Foreign Corrupt Practices Act, the UK Bribery Act or any other applicable anti-corruption law.

## **CONFIDENTIALITY AND PRIVACY**

Suppliers must safeguard Post's confidential information by keeping it secure and limiting access to those who have a need to know in order to do their job. Suppliers should avoid discussion of confidential information in public areas such as planes, elevators, and restaurants, as well as on mobile phones and in online social networking sites (Facebook, LinkedIn, Twitter and others) and in personal and company blogs. This obligation to preserve Post's confidential information extends beyond the termination of a supplier's business relationship with Post.

## **REPORTING ETHICAL CONCERNS**

Employees of suppliers are encouraged to work with their employers to resolve internal ethical concerns. Suppliers should, however, promptly report violations of this Code or any unethical behavior by a Post employee to a Post manager. If this is not feasible, suppliers may confidentially report ethical violations to:

Post Speak Up line: 1-877-452-3658 in the U.S. and Canada, or visit [www.postholdings.com](http://www.postholdings.com) to report ethical violations outside of the U.S. and Canada.

The Post Speak Up line is accessible 24-hours a day, seven days per week.

People who report concerns to Post may request that they remain anonymous. We will attempt to honor such requests. However, in situations when honoring a request for anonymity or a request to keep certain information confidential would, in Post's judgment, put the health or safety of others at risk, compromise protection of the environment, jeopardize product quality, or threaten other significant injury or damage, Post will disclose all information it feels is necessary to mitigate or eliminate such harm.

## **APPLICATION**

Adherence to this Code of Conduct is mandatory for each supplier and its supply chain. Acceptance shall be confirmed by any action reflecting a supplier's agreement to undertake or continue business with us. In the event of a violation of this Code, Post may terminate its relationship with the supplier without penalty. The terms of this Code are supplemental to any existing or future agreements between the parties and will serve to supplement rather than supersede such terms.