



HUMAN RIGHTS POLICY

Respect for human rights is a core value of the Fagerberg family and Fagerberg Produce Company. Since our company began raising onions in the 1940's, the Company has built a reputation on trust and respect that mirrors our strong values and characteristics of *Integrity, Honesty, Empathy* and *Caring* about our communities, workers and neighbors. Through our various roles as an employer, supplier, customer and custodian of the environment, we are committed to earning trust of all stakeholders with whom we come in contact. We strive to earn the trust of our stakeholders every day through adoption and applying a set of values known as our *Human Rights Policy*, that represent the highest standards of integrity and excellence.

We strive to respect and promote human rights in accordance with the Ethical Trading Initiative Base Code as well as the UN Guiding Principles on Business and Human Rights. Our goal is to help increase the enjoyment of human rights of our workers, neighbors, customers and within the communities in which we operate. Our *Human Rights Policy* is the foundation for our corporate behavior and our day to day business operations.

Fagerberg Produce Company *Human Rights Policy* was developed and published on December 15, 2018. This policy reflects our views on how our company should operate, but also recognizes that there are salient human rights risks of interest to various stakeholders inside and outside of our Company.

Our *Human Rights Policy* applies to all of our operations, including agricultural, packaging and corporate operations. We encourage those with whom we conduct business, including product suppliers, material vendors, labor agency service providers, supply vendors and any other business that intersects our company to respect our *Human Rights Policy* and apply the same values to their own business.

Our policy incorporates the following elements that support respect for human rights:

- Freely Chosen Employment
- Safe and Healthy Workplace
- Freedom of Association and Collective Bargaining
- Forced Labor and Human Trafficking
- Child Labor

- Work Hours, Wages and Benefits
- Anti-Harassment – no harsh or inhumane treatment
- Non-discrimination
- Regular Employment
- Land Rights

It is every person's responsibility within Fagerberg Produce Company to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment and is aligned with our *Human Rights Policy*.

Reporting of Human Rights Violations:

If any stakeholder to our Human Rights Policy believes that Fagerberg Produce, through any of its members' conduct is violating the *Human Rights Policy*, or feels that the company is not in compliance with any legal requirement for our business, they are asked to report it immediately to Fagerberg management. Claims shall be investigated and any action necessary to correct a violation shall be undertaken by management, and where the complainant is known, the company will report back on the remedial action taken.

For Employees, claims of violations can be communicated via various methods including:

- Email to humanrights@fagerbergproduce.com
- communication box located in the employee breakroom
- in-person to your supervisor, human resources representative or general manager

For all other stakeholders, claims of violations can be communicated via the following methods including:

- Email to humanrights@fagerbergproduce.com
- Mail addressed to:
 - President, Fagerberg Produce Company
 - 17673 C.R. 80
 - Eaton, CO 80615
- Phone call to 970.834.1353

Non-Retaliation:

Fagerberg Produce Company takes any claim of violation to our Human Rights Policy seriously and will be investigated, whether it was reported verbally or in writing. All persons involved, including complainants or alleged violators will be accorded due process or fair treatment. Fagerberg Produce will not tolerate retaliation against any person who presents a complaint or supports another's complaint or who participates in an investigation into any violation of this policy.

Responsibility:

The responsibility for compliance to the Fagerberg Produce Company Human Rights Policy is assigned to the President, Fagerberg Produce Company.

A handwritten signature in black ink, appearing to read 'R. Fagerberg', is written over a horizontal blue line.

Ryan Fagerberg

President, Fagerberg Produce Company LLC