



## VENDOR CODE OF CONDUCT

**Effective November 20, 2023**

MGP Ingredients, Inc. (together with all of its majority-owned subsidiaries, including Luxco, Inc., “MGP”) is committed to conducting business with the highest ethical standards, integrity, and social responsibility. MGP expects every employee to comply with the law and act ethically in all matters. These same expectations carry through to our vendors, suppliers, contractors, and other associated business partners (“Vendors”). This Vendor Code of Conduct (this “Vendor Code”) contains general principles applicable to all MGP Vendors.

This Vendor Code reflects the standards in the International Labour Organization’s Declaration on Fundamental Principles and Right to Work and the principles in MGP’s separate corporate Code of Conduct.

MGP expects its Vendors to conduct themselves in accordance with the following principles:

1. **Ethical Business Practices:** Vendors must conduct business with honesty, transparency, and integrity. Vendors may not engage in corrupt practices or bribery and must comply with anti-bribery and corruption laws, including the U.S. Foreign Corruption Practices Act and the U.K. Bribery Act.
2. **Labor Standards:** Vendors must provide safe and healthy working conditions for their employees. Vendors must respect workers’ rights, including fair wages, reasonable working hours, and freedom to associate, organize, and bargain collectively. Vendors may not employ child labor or forced labor or engage in or support any form of modern slavery or human trafficking.
3. **Quality and Safety Standards:** Vendors must provide products or services that meet or exceed MGP’s quality and safety standards. Vendors must implement quality control measures and adhere to all safety regulations.
4. **Human Rights:** Vendors must respect and protect human rights and adhere to ethical practices regarding land use, indigenous rights, and fair treatment of local populations.
5. **Anti-Discrimination and Harassment:** Vendors may not discriminate on the basis of race; color; religion; creed; national origin or ancestry; ethnicity; sex (including gender, pregnancy, sexual orientation, and gender identity); age; physical or mental disability; citizenship; past, current, or prospective service in the uniformed services; genetic information; or any other characteristic protected by applicable law. Vendors must promote and maintain a workplace free from harassment.
6. **Conflicts of Interest:** Vendors must compete fairly and ethically and may not engage in business activities that create a conflict or the appearance of a conflict of interest in their dealings with MGP. MGP expects Vendors to report any potential conflicts of interest to MGP immediately.

7. Compliance with Laws and Regulations: Vendors must comply with all applicable laws and regulations in their industry and region.
8. Accurate Books and Records: Vendors must maintain accurate books and records in accordance with applicable laws, regulations, and accounting standards. Vendors must ensure that all submitted invoices are complete, accurate, and timely.
9. Environmental Responsibility: Vendors must comply with all applicable environmental law and regulations. Vendors must conduct their business in a way that minimizes their environmental impact and actively work towards sustainability goals, such as reducing waste and conserving energy.
10. Privacy and Data Security: Vendors may have access to sensitive and proprietary information related to MGP's business and must handle it securely and in accordance with data protection regulations.
11. Reporting Mechanisms: Vendors should establish internal reporting mechanisms for employees and stakeholders to safely report concerns or violations.

Vendor contracts may contain more specific provisions pertaining to the same topics as this Vendor Code. Nothing in this Vendor Code is meant to supersede any more specific provision contained in a contract. In the event of any inconsistency between this Vendor Code and any other provision in a particular contract, the contract provision will control.

MGP expects any violation of this Vendor Code to be reported to MGP by the Vendor. MGP reserves the right, in addition to all other legal and contractual rights, to terminate its relationship with any supplier determined by MGP to be in violation of this Vendor Code.

MGP retains the right to request an audit to verify compliance with these expectations, including by requesting access to vendor records or facilities. As a condition of doing business with MGP, Vendor agrees to grant MGP access to Vendor's facilities and relevant records upon advance notice for purposes of verifying compliance with this Vendor Code.

Vendors must promptly report actual or potential misconduct that violates this Vendor Code to MGP by contacting MGP's Compliance Line at 1-866-580-3013 (U.S. and Canada) or 0800-046-5470 (U.K.) or by emailing [mgplegal@mgpingredients.com](mailto:mgplegal@mgpingredients.com).