

# CHS Business Partner Code of Conduct



## INTRODUCTION

Since its inception, CHS has built a reputation for operating with the highest level of integrity – we set high standards and hold ourselves accountable. Our focus on integrity is rooted in the rural values the company has been built on – trust, mutual respect and doing the right things for the right reasons. Wherever we are and whatever we are doing, we must pursue the highest ethical standards and always comply with the law. As someone who conducts business with CHS, or on behalf of CHS, you are expected to uphold this commitment.

This CHS Business Partner Code of Conduct details the CHS standards of doing business and applies to all CHS business partners – including, but not limited to, distributors, resellers, service providers and vendors. It is applicable to all CHS business partners and their personnel. CHS requires compliance with these standards and expects all business with CHS, or on behalf of CHS, to be conducted in an ethical and lawful manner. When requested, CHS will provide training on this code.

CHS may audit and inspect facilities and records related to CHS business and may terminate relationships with any business partner engaging in unlawful or non-compliant behavior.

Thank you for your partnership with CHS and your commitment to operating safely and with integrity.



## INTEGRITY AND COMPLIANCE WITH LAWS

### Obey the law

- CHS business partners must comply with all applicable national, federal, state, and local laws, rules, regulations, and ordinances (collectively, the “Law”).
- Not every situation is covered in this Code—additional information is available from the Additional Resources indicated at the end of this Code. It is your responsibility to know and understand the Law and to seek appropriate resources to the extent necessary to ensure your compliance with the Law.

### Speaking up and non-retaliation

- CHS is committed to promptly addressing potential violations raised in good faith and strictly prohibits any form of retaliation against individuals who raise concerns.
- Business partners are expected to raise concerns in good faith regarding suspected misconduct, policy breaches or legal or regulatory issues related to CHS business. Concerns may be reported through the CHS Helpline or other designated reporting channels.
- CHS will treat all reports seriously, ensure confidentiality to the extent possible and take appropriate corrective action where necessary.

### Fair competition

- CHS expects its business partners to compete fairly, honestly, and in compliance with all applicable antitrust and competition laws.
- Business partners should not engage in practices such as price-fixing, bid-rigging, market allocation, or other conduct that undermines free and fair competition.

### Anti-bribery and anti-corruption

- CHS competes vigorously – but always fairly and ethically – and requires its business partners to uphold the same standard.
- Business partners must not, directly or indirectly, offer, give, request or accept bribes, kickbacks or improper gifts of any kind, whether in dealings with government officials or private parties.
- All partners must comply with applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act of 1977 and equivalent local laws where business is conducted.

### Honest and accurate dealings

- CHS business partners must conduct all transactions with honesty, accuracy and transparency.
- Partners must not make false statements, misrepresent facts, falsify records or create fraudulent contracts or documents in any dealings with CHS.
- All records, reports and communications related to CHS business must be truthful, complete and maintained in accordance with applicable laws and regulations.

### Conflict of interest

- CHS business partners should avoid situations where personal, financial or family interests could improperly influence business decisions with CHS.
- If a partner's employees, investors, affiliates or family members have a relationship with a CHS employee who can influence CHS business decisions, the partner is expected to promptly disclose this to CHS.

### Insider trading and improper commercial advantage

- Business partners must safeguard all non-public information received from CHS and must never use it for personal gain or to benefit third parties.
- Partners are prohibited from buying, selling or recommending securities based on material non-public information, or otherwise exploiting confidential information to gain an unfair commercial advantage.

### Privacy and confidentiality

- Business partners must respect CHS intellectual property rights and protect all confidential, customer and personal data shared in the course of doing business.
- Partners are expected to comply with the CHS Global Privacy Policy, available at [chsinc.com](https://chsinc.com), and with all applicable data protection and privacy laws.

- Partners are responsible for the accuracy of records and disclosures related to their business structure, financial condition and performance in compliance with applicable legal requirements.
- Only individuals expressly authorized and properly trained may speak publicly on behalf of CHS.

### International trade

- CHS business partners must comply with all applicable laws and regulations that address the import and export of goods and services, boycotts and sanctions.

### Responsible sourcing of minerals

- CHS reviews its supply chain for the use of tin, tungsten, tantalum and gold (3TG). Business partners must disclose if products or equipment supplied to CHS contain, or may contain, any of these minerals.
- If there is uncertainty regarding 3TG content, partners should promptly notify CHS compliance through the designated reporting channels for guidance.
- Partners are expected to support responsible sourcing practices, including conducting due diligence on their own supply chains in alignment with applicable legal and industry standards.



## LABOR STANDARD

### Fair treatment

- Business partners are expected to respect all employees, value cultural diversity and make employment decisions based on merit, qualifications and job requirements.
- Business partners are encouraged to create a workplace free from discrimination, harassment or unfair treatment in any form.
- CHS discourages the use of forced labor, child labor, debt bondage, slavery or any form of human trafficking.
- Partners must comply with all applicable labor, discrimination and harassment laws; provide appropriate rest days; and ensure working hours are lawful and not excessive.

### Safety

- CHS is committed to safety and expects business partners to provide a safe, healthy and productive workplace for employees, contractors and visitors.
- Partners should eliminate unsafe practices, comply with all occupational health and safety laws and provide proper training, equipment and protection to employees and communities.
- Partners involved in producing animal or food products must also comply with all applicable laws governing production, labeling, storage, sale and distribution to ensure product safety and integrity.



### Child labor avoidance and working hours

- Business partners should not employ child labor and should have documented procedures to verify compliance.
- Partners must comply with all local laws and international standards regarding wages, working hours and conditions.
- Workers under the age of 18 should not perform hazardous work or tasks that could compromise their health, safety or education.



## ENVIRONMENTAL STANDARDS

### Environmental responsibility

- CHS recognizes that today's decisions have lasting impacts on the planet. We partner with businesses that share our commitment to protecting the environment and complying with all applicable environmental laws and regulations.
- Business partners are expected to actively promote sustainability by conserving resources, reducing emissions, minimizing waste and preventing pollution in their operations.

### Hazardous substances

- Business partners must comply with all applicable laws and regulations governing the use, restriction and disposal of hazardous or restricted substances in products and manufacturing processes.
- Partners are expected to minimize the use of harmful substances, wherever possible, and adopt safe alternatives consistent with industry best practices.



## MONITORING AND COMPLIANCE

- Business partners are expected to maintain effective processes and controls to ensure compliance with this Code of Conduct.
- In relation to activities between business partners and CHS, CHS may conduct audits, request documentation or perform risk-based due diligence to verify adherence to applicable standards and expectations. Business partners are encouraged to cooperate fully by providing complete, accurate and timely information upon request.
- If CHS determines that a business partner has violated this code, CHS may require corrective action, implement a remediation plan or suspend or terminate the business relationship at its sole discretion.

## ADDITIONAL RESOURCES

- **CHS Global Code of Conduct**  
<https://codeofconduct.chsinc.com/>
- **CHS compliance office**  
CCI@chsinc.com
- **CHS Helpline**  
888-264-0995, [www.chsinc.ethicspoint.com](http://www.chsinc.ethicspoint.com) or the QR code below

Please see the [CHS EthicsPoint home page](#) for helpline contact information for locations outside of the United States.



Access the CHS Helpline by scanning the above QR code with your phone camera.