



**Alto Ingredients, Inc.**  
1300 South Second Street  
Pekin, Illinois 61554  
309-347-9222

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## Supplier Code of Conduct

Alto Ingredients, Inc. (NASDAQ: ALTO) is a leading producer and distributor of specialty alcohols, renewable fuels and essential ingredients. Leveraging the unique qualities of its facilities, the company serves customers in a wide range of consumer and commercial products in the Health, Home & Beauty; Food & Beverage; Industry & Agriculture; Essential Ingredients; and Renewable Fuels markets.

Alto is committed to having a positive impact on our employees, investors, partners, consumers, and the planet we share. In that spirit, Alto has created this Supplier Code of Conduct ("Code") to set forth the principles and expectations for our Supplier Partners. These principles are an important part of our Supplier Partner evaluation and selection process, and this Code has been approved and is overseen by both the Quality and Purchasing departments. We expect our Supplier Partners to commit to the principles in this Code and evaluate their respective suppliers against the same principles of this Code.

Supplier Partners are required to comply with all applicable laws, rules, and regulations, and to treat legal requirements as a minimum standard. We expect our Supplier Partners to recognize and respect all Alto principles and standards detailed in this Code.

- I. **Business Ethics and Integrity:** Alto commits to the highest standards of ethical conduct and compliance with applicable laws. We expect our Supplier Partners to ensure that all business dealings are fair, legal, and honest and conform with this Code. Our Supplier Partners must never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Alto's business, and they must avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate.
  - a. ***Conflicts of Interest.*** Suppliers shall perform reasonable measures to avoid situations that present, or create the appearance of, a conflict between their interest and their obligations to Alto.
  - b. ***Anti-Bribery and Corruption.*** Suppliers shall not engage in bribery and shall have systems in place to ensure compliance with all applicable laws. Suppliers are expected to comply with Alto's Anti-Bribery & Corruption Policy.
    - i. Bribery is defined as: To offer payment, promise to pay, or authorize payment of any money, offer, gift, promise to give, or authorize giving of anything of value with intent to influence an official act, foreign or domestic government decision, or business decision; to receive payment, promise of payment, authorization for payment of any money, offer, gift, promise to give, or authorization to receive of anything of value with intent to in return be influenced to induce an official act, foreign or domestic government decision, or business decision.
    - ii. Corruption is defined as: To conduct business in a manner that is in violation with an applicable law, including the U.S. Foreign Corrupt Practices Act, Anti-Kickback Statute, Sunshine Act, and good business ethics; to directly or indirectly take any action in furtherance of, any payment or transfer of anything of value for the purpose or intent of influencing, inducing or rewarding any act, omission or decision to secure an improper advantage.



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- c. ***Anti-Counterfeiting.*** Suppliers shall not knowingly purchase or otherwise acquire counterfeit, illegally diverted or stolen products. If the supplier is offered to purchase or becomes aware of counterfeit, illegally diverted or stolen products in their supply chain that may affect the goods or services the supplier renders to Alto, the supplier will notify Alto immediately.  
***Fair Competition.*** Suppliers shall conduct business in compliance with all applicable anti-trust laws.
- II. **Environmental:** Alto is committed to comply with all applicable environmental laws, rules, and regulations, and conduct operations in a way that minimizes the impact on natural resources and protects the environment. Alto is committed to minimizing our environmental footprint across our operations. We expect our Supplier Partners to operate under the highest standards of environmental stewardship.
- III. **Labor and Human Rights:** Alto respects the human rights of workers and community members. Alto expects its Suppliers to respect the human rights of workers, including prohibiting child, forced, and/or compulsory labor; comply with laws governing human trafficking and slavery; ensure compliance with applicable wage and hour laws, including living wage laws; comply with laws governing freedom of association. We expect our Supplier Partners to provide equal employment opportunities to all employees and employee candidates regardless of race, color, age, religion, gender, sexual orientation, national and social status, disability, and veteran status. Prohibit workplace discrimination, violence, harassment, physical, verbal or other abuse, or sexual harassment of an employee or employment candidate.
  - a. ***Non-Discrimination.*** Suppliers shall not subject employees to discrimination of any kind based on race, religion, age, nationality, gender, disability, sexual orientation, trade union membership or political affiliation or any other status protected by law.
  - b. ***Abuse, harassment, and disciplinary action.*** Suppliers shall provide a work environment free of abuse and harassment. No workers shall be subject to mental or physical abuse, threatening, exploitative or sexually coercive behavior. Written disciplinary rules and procedures must be fair, reasonable, and validated by local government authority. Workers' grievances are dealt with in a fair and proper manner.
  - c. ***Freedom of association and collective bargaining.*** Suppliers shall acknowledge employees' right to form and join trade unions, employee representative organizations or any other employee associations freely and lawfully without interference by suppliers.
  - d. ***Child labor.*** Suppliers shall not use child labor. Suppliers shall not engage employees below the legal minimum age as required by local law. Suppliers agree to verify the age of their employees and maintain documented proof of their employees' ages.
  - e. ***Voluntary labor.*** Suppliers shall not engage in forced labor. All work is voluntary and not performed under threat of penalty or coercion. Forced labor, including slave, bonded, trafficked, indentured or prison labor, is prohibited.
  - f. ***Working hours.*** Suppliers shall communicate overtime requirements to employees and shall comply with all local legal requirements regarding overtime and time-off. All workers must receive at least one day of rest for every six (6) days worked. Work hours should not exceed the legal maximum under local law.



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- g. ***Wages and Benefits.*** Suppliers shall compensate all workers with wages, including overtime premiums that meet legal standards and provide legally required insurance and benefits as mandated by local law. Deductions from wages as a disciplinary measure are not permitted.
- IV. **Safety and Health:** Alto seeks to provide a safe and healthy working environment and strives to ensure that our employees and contractors go home safe every day. We expect our Supplier Partners to value safety and well-being in their operations by making continuous efforts to achieve a workplace that is free from work-related injuries and illnesses.
- V. **Product Quality:** Alto seeks to comply with all applicable product safety, quality, and labeling laws, rules, and regulations. Product safety and quality is crucial to manufacturing Alto's essential ingredients. We expect our Supplier Partners to respect the products they supply.
- VI. **Sustainability:** Alto strives to conduct business in a sustainable and responsible manner. Alto seeks to do business with Supplier Partners who share our commitment to sustainable business practices, creating shareholder value and corporate citizenship.
- VII. **Confidentiality and Privacy:** Alto seeks to maintain the confidentiality of Alto's confidential information and comply with applicable data privacy and data protection laws. Alto expects Supplier Partners to not disclose Alto's confidential information to any person or entity without Alto's prior written consent and to only use Alto's confidential information for the purpose of performing under supply relationship with Alto. Suppliers shall protect and make only proper use of confidential information to protect the privacy rights of the company, workers, patients, and any other parties engaged in conducting business with or on behalf of Alto. When our Supplier Partners handle personal and confidential information about Alto's employees, consumers, customers, Suppliers, or other third-party partners, Alto expects its Supplier Partners to take all reasonable and appropriate steps to safeguard the information from unauthorized disclosure and theft in accordance with all applicable data privacy and data protection laws.
- VIII. **Animal Welfare:** Alto seeks to protect animal welfare and well-being and ensure humane treatment. We expect our Supplier Partners to uphold the highest standards of animal health and welfare in their own operations and to comply with all applicable laws and regulations.
- IX. **Monitoring and Compliance:** Alto is committed to implementing the appropriate compliance programs to ensure its commitment to respect the principles and standards in this Code. Alto reserves the right to audit compliance with this Code and take corrective action as appropriate, including ceasing to do business with any Supplier Partner who does not respect the principles and standards of this Code. Management will review and reassess, at least annually, the adequacy of this Code and implement changes as needed.