

Code of Vendor Conduct

Green Plains Inc. (the “Company” or “Green Plains”) is committed to doing business ethically, with integrity and in compliance with all applicable laws, regulations and industry standards, and it expects its business partners, including all Vendors of goods and services (collectively, “Vendors”), to share those values and act accordingly. This Code of Vendor Conduct (“Code”) outlines the Company’s expectations, and any failure to comply with these minimum requirements may jeopardize a Vendor’s relationship with Green Plains. This Code is based on the standards and guidelines set forth by the International Labour Organization (ILO).¹

SECTION I: HUMAN RIGHTS, WORKING CONDITIONS AND THE RIGHTS OF VENDOR EMPLOYEES

Vendors of the Company must respect the dignity and human rights of those associated with and impacted by their operations. At a minimum, this commitment requires compliance with all applicable laws, regulations and standards regarding labor rights, employment practices and working conditions.

Human Trafficking and Forced Labor: Vendors shall employ only those who are legally authorized to work and who choose to do so voluntarily. Slavery, forced or coerced labor, bonded labor, indentured servitude, involuntary prison labor and any other form of exploitation are strictly prohibited. Vendors’ employees shall not be subject to unreasonable restrictions on movement within the workplace, and Vendors shall not withhold their employees’ identification or travel documents. Vendors shall not engage in or support any form of human trafficking.²

Child Labor: Vendors shall verify the age of all prospective employees and shall not use child labor in violation of any applicable laws establishing a minimum employment age. In addition, Vendors shall not employ any person who is less than fifteen years old, unless such employment is undertaken pursuant to an apprenticeship or other program that is expressly authorized by law, is clearly beneficial to the individual and neither improperly interferes with the individual’s education nor threatens his or her physical, mental or emotional development.³

Wages, Benefits and Hours of Work: Vendors shall fully comply with all applicable labor and employment laws and regulations, including all applicable wage laws, as well as the terms of any collectively bargained agreements. Their employees shall be paid fair and competitive regular and overtime wages that meet or exceed mandatory minimum wages and are appropriate for the type of work being done. Similarly, Vendors shall provide their employees with all legally mandated

¹ Full listing of ILO standards, conventions and recommendations can be accessed at:
<https://www.ilo.org/global/standards/lang--en/index.htm>

² See ILO fundamental conventions, No. 29, Forced Labour, 1930, its Protocol of 2014 and No. 105, Abolition of Forced Labour, 1957.

³ See ILO fundamental Conventions, No. 138, Minimum Age, 1973 and No. 182, Worst Forms of Child Labour, 1999 and in the UN Convention on the Rights of the Child.

benefits. No employee of a Supplier shall be required to work excessive hours, and all such employees shall be afforded regular time off of work. Wage deductions shall not be used as a disciplinary measure.⁴

Health and Safety: Vendors shall provide a clean, safe and secure working environment. All facilities must comply with applicable health and safety laws and regulations. Vendors shall proactively identify and address workplace hazards and shall provide appropriate health and safety-related training. In addition, Vendors shall implement emergency preparedness measures and take appropriate steps to protect their employees from violence and threats of violence during work.⁵

Dignity and Respect: Vendors shall treat all of their employees fairly and with dignity and respect. Corporal punishment, physical or verbal abuse, inhumane treatment and harassment are prohibited. In addition, Vendors' employees shall not be subjected to any other abusive, coercive, hostile, insulting, intimidating, offensive, threatening or unwelcome behavior in the workplace. Vendors shall not discriminate against current or prospective employees on grounds of race, color, religion, sex, gender identity or expression, sexual orientation, national origin, citizenship, age, genetic information, physical or mental disability, veteran status or any other protected basis. Vendors shall comply with applicable privacy laws and regulations and reasonably respect the privacy rights of their employees and any other parties with whom they do business.

Freedom of Association: Consistent with applicable laws and regulations, Vendors shall respect the legal rights of their employees to choose whether or not to join a trade union, workers' organization or any other similar group and to collectively bargain if they choose to be represented.⁶

SECTION II: ENVIRONMENTAL STEWARDSHIP AND SUSTAINABILITY

Vendors of Green Plains must strive to minimize the adverse impact of their operations on the environment.

Safety and Health: Vendors shall maintain safe and healthy working environments for employees. This commitment includes, among other things, ensuring that facilities are constructed and maintained in accordance with applicable law and that employees are provided with adequate work stations and equipment. Workers should also receive training in product and safety practices, and Vendors shall develop adequate emergency response plans at their facilities.

⁴ See ILO Conventions No. 95, Protection of Wages, 1949 and No. 94, Labour Clauses (Public Contracts), 1949.

⁵ See ILO Conventions, Recommendations and Codes of Practice (see: <http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang--en/index.htm>).

⁶ See ILO fundamental Conventions, No. 87, Freedom of Association and Protection of the Right to Organize, 1948 and No. 98, Right to Organize and Collective Bargaining, 1949.

SECTION III: ETHICAL AND LAWFUL BUSINESS PRACTICES

Vendors of Green Plains must act with integrity and in accordance with the highest ethical standards. At a minimum, this requires compliance with all applicable laws, regulations and rules, as well as a commitment to strong governance practices and transparency in all business activities.

Anti-Corruption: Green Plains has a zero-tolerance policy with respect to bribery and corruption. Vendors shall not exercise improper influence or directly or indirectly offer, give or promise money or any other thing of value (including facilitation payments, gifts, meals, entertainment or other business courtesies and benefits, regardless of value) to any individual for an improper purpose. This prohibition applies regardless of whether the recipient is a government official or representative of a private company. Similarly, Vendors shall not solicit or accept any bribes, kickbacks or other improper payments.

Gifts and Entertainment: Vendors shall not offer, give, promise, solicit or accept any gifts, meals, entertainment, travel or other business courtesies or benefits unless there is a legitimate business reason for doing so and the situation could not give rise to even an appearance of impropriety. All business courtesies and benefits given and received must be lawful, reasonable and consistent with industry standards.

Conflicts of Interest: When dealing with Green Plains, Vendors must remain free of any improper influences that stem from personal, business or other arrangements that could create a conflict of interest. Any potential conflicts must be promptly disclosed to the Company so that appropriate remedial actions can be taken.

Competition and Fair Dealing: Vendors shall not enter into anti-competitive agreements or otherwise seek to undermine free and fair competition in violation of applicable antitrust and competition laws. All information regarding a Vendor's products and services must be accurate and truthful. Misleading statements intended to gain a competitive advantage and disparaging or untrue statements about competitors are prohibited.

International Trade: When doing business with Green Plains, Vendors shall ensure that no transactions directly or indirectly involve parties that are subject to U.S. economic sanctions. In addition, Vendors shall ensure that any transactions involving items or information subject to export controls are lawful, including by obtaining any required export licenses or other permits. Vendors shall respect all laws and regulations governing the importation of goods into the United States.

Use of Information and Assets: In some instances, Vendors will have access to the Company's facilities, equipment, systems, information or other assets. Vendors shall comply with the terms of any agreements governing the use of such assets and shall take all appropriate steps to protect them from damage, loss, misuse, theft or unauthorized access. In particular, confidential information may only be used for legitimate business purposes and must never be shared with third parties



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unless specifically authorized by Green Plains. Vendors shall not use the Green Plains logo, trademarks or service marks without written authorization.

Financial Integrity: In accordance with applicable laws and accepted accounting practices, Vendors shall implement internal controls over financial reporting and maintain accurate and complete books and records that fairly reflect all transactions. All contracts and invoices shall accurately and in reasonable detail describe the goods and services provided to Green Plains. False, incomplete or misleading business records are unacceptable.

Product Quality and Performance: Vendors shall respect all contracts with the Company and deliver goods and services on time and to the agreed-upon specifications. All goods must comply with applicable quality, safety and labeling requirements.

Mandatory Compliance and Scope: Compliance with this Code is a condition of doing business with Green Plains.

Vendor Compliance Program: Vendors shall take steps to ensure their compliance with this Code, including by implementing an ethics and compliance program that is reasonably designed to address all relevant topics. Features of such a program may include a management commitment to ethical business practices and compliance with applicable laws and regulations, appropriate policies, procedures and internal controls, training for employees, mechanisms for employees and others to raise concerns without fear of retaliation and processes to address such concerns.

Reporting and Violations: Vendors shall promptly inform Green Plains of any violations or suspected violations of this Code and promptly take corrective action to remediate the violation. Reports can be made to the Company Chief Legal and Administration Officer.

If any Vendor wishes to anonymously raise a concern regarding potential violations of this Code or other ethics and compliance issues related to business with Green Plains, they may do so via the Company's EthicsPoint website or toll-free hotline, which is administered by an independent provider and can be reached in any of the following ways:

Online: <https://gpreinc.ethicspoint.com>

Telephone: 844.957.2596

Green Plains will investigate all reports of misconduct promptly and thoroughly. Any substantiated allegations may result in corrective actions or termination of contract. There will be no retaliation against anyone who makes a good faith report of alleged wrongdoing, even if it is ultimately determined that no violation occurred.

Additional Information: Any questions about this Code or the Company's expectations should be raised to the Chief Legal and Administration Officer. For the avoidance of doubt, nothing in this



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Code is to be interpreted or applied in any way that prohibits, restricts or interferes with an individual's (a) exercise of rights provided under, or participation in, "whistleblower" programs of the U.S. Securities and Exchange Commission or any other applicable regulatory agency or governmental entity (each, a "Government Body"), or (b) good faith reporting of possible violations of applicable law to any Government Body, including cooperating with a Government Body in any governmental investigation regarding possible violations of applicable law.

Disclaimer: The Green Plains Vendor Code of Conduct can be modified, changed or withdrawn by Green Plains at any time. This Code, or the demonstration of its compliance, does not create any agency relationship or third-party beneficiary rights for the Vendor.