

# The Scoular Company's Code of Conduct





## A Message from Scoular's CEO, Paul Maass

At Scoular, we have a long history of serving customers with innovative solutions. We are proud of what we do, and rightly so. Equally important to what we do is how we do it—with an unwavering commitment to safety, integrity, and upstanding business conduct. Doing what is right matters. It matters to our co-workers, customers, business partners, and communities. And it matters greatly to me.

As a leader at Scoular, I am excited to bring this Code of Conduct to our employees, to our workplace, and to our business dealings. It represents what we and our business partners already know, that you can trust Scoular's people. This Code of Conduct simply codifies the culture that already lives within our company. Consequently, Scoular's Code of Conduct should serve as a guide, as well as a resource, for our employees making decisions that are consistent with acting with integrity in all we say and do. The quality of our people and our commitment to ethics and compliance will continue to be a key component in our long-term success.

Thank you for your commitment to acting with integrity and supporting the broad adoption of our Code of Conduct. Following the principles described in our Code of Conduct, as well as the guidelines provided by our existing and future policies, will not only help us meet our goals and required legal standards, but also will allow each of us to be proud of how we continue to succeed.

Sincerely,

Paul Maass  
CEO

## VALUES



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## Our Values, Guiding Principles, and Code of Conduct

We know that our reputation is critical to our success and that reputation is earned through our interactions with our employees, customers, suppliers, business partners, competitors, and others. Today's business environment is complex and constantly changing. However, one thing that will never change is our belief that maintaining our good reputation depends on each of us being personally responsible for our conduct. Our commitment to safety, integrity, and upstanding business conduct is not situational. We expect our actions to be consistent with these commitments at all times.

### SCOULAR'S VALUES

**We hold ourselves accountable for:**

**Integrity.** Our word is our bond. We do what is right, not just what is easy or allowable. We are candid in our relationships.

**Curiosity.** It is the root of our creativity, innovation and flexibility. We seek deep understanding of markets and customers' unique needs. Coupled with knowledge, it leads to creative, unique solutions for mutual benefit.

**Perseverance.** We commit to shared goals knowing there are many paths to reach them. Success means that we deliver results in the right way.

**Inclusion.** We win when we bring a diverse set of ideas and people together to collaborate for company success.

**Compassion.** Our employees are people first. We understand and value all that each person contributes to our collective well-being. We show compassion when adversity affects any of us. Each of us is stronger because of this.

**Stewardship.** We deploy the assets of the company to win, while being disciplined to safeguard them for the next generation.

### SCOULAR'S GUIDING PRINCIPLES FOR ACTING WITH INTEGRITY

**We demonstrate our commitment to integrity and ethics when:**

- We comply with the law.
- We treat our coworkers and others with respect and dignity.
- We engage in honest and transparent business dealings.
- We protect Scoular's information, assets, and interests.
- We maintain accurate business records.
- We contribute as a global corporate citizen.

## How to Use Scoular's Code of Conduct

While our values describe Scoular's culture and provide a benchmark against which each of us can measure our actions, the Guiding Principles and this Code of Conduct (this "Code") further assist us by providing direction for living those values—a guide for making decisions that are consistent with acting with integrity in all we say and do. In a growing company with global reach, demonstrating our commitment to safety, integrity, and upstanding business conduct requires each of us—employees, officers and directors of Scoular and its subsidiaries worldwide—to observe our values and consistently act in accordance with this Code wherever we operate.

Scoular's Code is a foundational document and set of guidelines that supports our business activities. As the cornerstone of our work to drive integrity in all we do, it highlights key policies and provides guidance for action when the appropriate action may not be clear. This Code may be amended from time to time.

This Code applies to all Scoular employees worldwide, regardless of where they work or live. We also expect certain third parties, including our contractors, temporary workers, interns, suppliers, vendors and in some circumstances, our customers ("Third Parties") to act in accordance with our Code.

### ADDRESSING CONFLICTS WITH THE CODE OF CONDUCT

This Code is designed to be appropriate regardless of where we operate. However, you may encounter a conflict between this Code and the various laws and practices that apply to our business in different countries. In the event of a conflict, contact Scoular's Senior Vice President, General Counsel & Corporate Secretary for assistance in resolving the conflict. Further, to the extent that any provision of our Code violates the laws of a particular country, that country's law shall apply.

### MAKING GOOD DECISIONS

While this Code guides us to make decisions that are consistent with Scoular's commitment to safety, integrity, and upstanding business conduct, values and culture, it may not provide a clear answer for each situation you may face. The most important quality we bring to deciding how to act is our good judgment, and when we are uncertain about the best course of action, to seek guidance. It is always better to ask than to risk a poor decision.

**When faced with a tough decision, it may also help to pause and ask yourself:**

- Is it legal?
- Is it consistent with our commitment to safety, integrity, and upstanding business conduct, our values, this Code, and our policies, practices, and protocols?
- Would I be proud to tell someone I admire about my conduct?
- Does it show respect for employees, customers, suppliers, and other business partners?
- If it became public, would it reflect well on Scoular and me?

## We Comply with the Law

Scoular strives to comply with all applicable laws, rules and regulations that affect our business. Because Scoular operates around the world, our business activities are subject to an increasingly complex set of laws, regulations and cultures that vary depending on country. Some laws extend beyond the borders of a specific country. For example, anti-bribery and trade sanctions laws in the U.S. apply to our operations around the globe. All Scoular employees are responsible to understand the laws that apply to their business and complying with those laws. In some instances, the laws of two or more countries may appear to conflict. If you encounter a potential conflict, contact the Legal Department to understand how to resolve the conflict.

Likewise, we expect our customers, suppliers, business partners, competitors and others with whom we do business to comply with the law.

## We Treat our Coworkers and Others with Respect and Dignity

### VALUING DIVERSITY AND INCLUSION

At Scoular, we believe that by embracing the many different perspectives and backgrounds of our employees and Third Parties, we make better business decisions and are positioned to better serve the diverse needs of our customers around the world. Accordingly, we seek to encourage an environment where all people are valued, included, and respected. If you are interested in learning more about steps Scoular is taking to create a more diverse and inclusive culture, please contact Scoular's Chief Diversity Officer Jennifer Deitloff ([jdeitloff@scoular.com](mailto:jdeitloff@scoular.com)) and/or any member of the Diversity and Inclusion Council.

### EQUAL EMPLOYMENT OPPORTUNITY

We provide equal opportunities in employment to all applicants and employees without regard to their protected status, including race, sex, color, religion, national origin, gender, sexual orientation, pregnancy, age, gender identity or expression, disability, genetic, veteran status, military status, leave status and/or any other characteristic or status protected by law. Unlawful discrimination has no place at Scoular. We will ensure that decisions with regard to recruitment, employment, promotion and demotion, transfer, discipline, compensation and benefits, training and termination are based on legitimate, nondiscriminatory reasons. If you have questions or complaints related to this policy, please contact your supervisor, human resources representative or any of the individuals identified in the Reporting a Concern section. No individual who raises a concern in good faith shall suffer any form of retaliation.

### PROHIBITION OF HARASSMENT AND RETALIATION

Scoular is committed to providing our employees a work environment that is free from unlawful harassment and inappropriate conduct. We will not tolerate harassment of and/or inappropriate conduct toward our employees or Third Parties by anyone. Harassment is unwelcome conduct that is based on an individual's protected status that interferes with an individual's work and creates an intimidating, hostile or offensive work environment. Some forms of harassment include, but are not limited to:

- Verbal harassment, including inappropriate or derogatory comments, jokes or slurs;
- Visual harassment, including inappropriate or derogatory notes, emails, text messages, social media posts, gestures or drawings; and
- Physical harassment, including any unnecessary or inappropriate touching.

Sexual harassment has a significant negative impact on individual victims and is not tolerated at Scoular. Some examples of inappropriate sex and/or sexually based conduct not tolerated by Scoular include unwelcome sexual

advances, requests for sexual favors and any other verbal, visual or physical conduct based on sex when submission to or rejection of the conduct impacts or influences a term or condition of employment or interferes with an individual's work environment.

## **REPORTING HARASSMENT, DISCRIMINATION, RETALIATION, OR OFFENSIVE CONDUCT**

Any individual who believes he/she has suffered from harassment, discrimination, retaliation, and/or inappropriate conduct of any kind by a Scoular employee or Third Party should report the behavior immediately. Individuals should immediately contact their supervisor, human resources representative or any of the individuals identified in the Reporting a Concern section, or make a report through Scoular's incident management system ("Open Door"). All reports of harassment, discrimination, retaliation, and/or offensive conduct are taken seriously and will be promptly investigated. Any Scoular employee, whether a co-worker, supervisor, manager or executive who engages in inappropriate behavior will be subject to discipline, up to and including termination of employment. No individual will suffer unlawful retaliation for reporting good faith concerns of harassment, discrimination, retaliation, and/or inappropriate conduct or participating in an investigation.

## **SAFE AND SECURE WORK ENVIRONMENT**

Everyone—employees, contractors and visitors to our offices and facilities—has a right to expect a safe and secure work environment. Scoular is committed to providing a safe and secure work environment and complying with all applicable legal requirements. Each of us is expected to understand and follow the workplace safety programs that apply to our jobs. There is zero tolerance for failing to follow these programs. Our goal is an accident-free workplace and each employee is responsible to take appropriate action to protect themselves and their co-workers by immediately reporting accidents, injuries and unsafe or threatening practices or work conditions. There is no production goal, cost, time-saving measure or competitive advantage that is ever worth engaging in unsafe behavior. Scoular leadership expects and encourages every employee to feel empowered to raise their hand and identify a real or potential safety concern without fear of retaliation. Employees who discourage reporting a safety concern will be subject to discipline, up to and including termination of employment.

Similarly, violence of any kind has no place at Scoular. Acts or threats of physical violence, bullying, intimidation or other hostile behavior are prohibited. Carrying or possessing weapons or objects used to cause harm to another individual is not permitted at Scoular locations and/or facilities unless otherwise required to be permitted by law. Possession of a concealed carry permit for firearms does not permit an individual to possess a firearm on their person while on Scoular property or while engaged in Scoular business. This Code does not prohibit an employee from keeping a properly permitted firearm securely stored in his/her personal vehicle, however such firearm shall not be removed from the vehicle.

Scoular acknowledges that from time to time, Scoular employees may participate in business development activities with current and/or prospective customers that involve hunting, shooting events, and/or firearm use in general. Participating in lawful activities involving firearms away from Scoular facilities and while engaged in business development and/or customer entertainment events does not violate this Code.

## **DRUG AND ALCOHOL-FREE WORKPLACE**

Scoular provides employees with a drug/ alcohol-free work environment. Improper use of alcohol, drugs or other medication poses a safety risk and is not permitted. Employees are prohibited from:

- reporting to work or working while impaired by alcohol, drugs, or other medication (prescription, licensed or over-the counter); or
- possessing, selling, using, distributing or offering to others alcohol, drugs, medication (except as permitted by law) or paraphernalia

Employees who are taking prescription medication that may impair their ability to work or that may pose a threat to safety are encouraged to discuss the situation with human resources or their manager.

Scoular acknowledges that there may be instances where drinking alcoholic beverages while conducting company business is acceptable, such as part of employee recognition events, internal meetings, industry association events, and/or while entertaining customers or other third parties. In those instances, employees must comply with all laws and company policies and principles, and exercise both moderation and good judgment.

## **DATA SECURITY AND PRIVACY PROTECTION**

As part of the employment relationship, we may collect, hold or process personal information about employees and third parties. We take necessary precautions to protect and use such information in compliance with the applicable laws where we operate. If you have questions about data privacy and security measures please contact Scoular's Chief Information Officer.

## **We Engage in Honest and Transparent Business Dealings**

### **HONEST AND FAIR DEALING**

We are fair, honest and trustworthy with our customers, suppliers, business partners, employees, competitors and other parties. We promise what we can deliver and deliver what we promise. We seek long-lasting relationships with others who behave similarly, embrace and demonstrate high standards of business integrity and share our commitment to comply with this Code. We work to understand and meet the needs of those with whom we do business, while always remaining true to this Code. We treat others as we would like to be treated.

Additionally, employees must engage honestly with the market. Engaging in practices that distort prices or artificially inflate trading volume with the intent to mislead the markets is strictly prohibited.

### **ANTI-CORRUPTION AND ANTI-BRIBERY**

We conduct our business in a wide range of business and legal environments and are committed to operating with integrity. Additionally, we seek to avoid even the appearance of impropriety in the actions of our employees, agents, joint ventures and other third parties. Accordingly, we are committed to following the laws applicable to our operations under anti-corruption and anti-bribery laws everywhere we operate. Scoular prohibits employees or third parties acting on our behalf from offering, promising, lending or paying money or anything of value (including gifts and entertainment), whether directly or indirectly, for the purpose of influencing the acts or decisions of public officials. This includes small, unofficial payments to secure or expedite a routine, non-discretionary government action that is otherwise required to be performed. The Foreign Corrupt Practices Act and the local laws of other countries where we operate prohibit such activities and violations of these laws can result in criminal actions against Scoular and individual employees. Please contact the Legal Department for further guidance on The Scoular Company's anti-corruption and anti-bribery expectations for more detail of the specific requirements and prohibitions applicable to our operations. Scoular strictly prohibits unlawful retaliation of individuals who report conduct related to a violation and/or a suspected violation of anti-corruption and/or anti-bribery laws.

### **ANTI-TRUST AND FAIR COMPETITION**

Scoular seeks to outperform its competition fairly and honestly. We believe that preservation of a competitive economy is essential to the public interest, the business community and our company. Stealing proprietary information, using a third party's trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is not in the spirit of fair and honest competition and is prohibited. Scoular respects the rights of—and deals fairly with—our customers, suppliers, competitors and employees.



Competition laws of different countries vary, although they generally prohibit competitors from working together to limit competition. Such laws are designed to protect fair competition in the marketplace. Accordingly, to comply with such anti-competition laws, the following actions are prohibited:

- discussing, fixing, or controlling prices with any competitors;
- dividing or sharing customers, markets, or territories;
- participating with others to block the production or sale of another's products or services;
- joining with others in creating or planning an unreasonable restraint of trade or reduction in competition between competitors;
- joining with others in boycotting certain customers or suppliers; and
- engaging in illegal price discrimination (see below).

Subject to several justifications and exceptions, it is illegal for a seller to make concurrent sales of commodities of like grade and quality to competing buyers at different prices based on who the customer is, all other circumstances being equal. The provisions of the law on price discrimination are complex and have been stated here in only general terms. Please contact the Legal Department for guidance if you have any questions concerning the price, terms and allowances to be granted in relation to sales.

If you are aware of a violation or potential violation of any of these practices or you need additional guidance on these issues, contact the Legal Department or report the concern immediately so they may assist you. Scoular strictly prohibits unlawful retaliation of individuals who report conduct related to a violation and/or a suspected violation of antitrust law.

### **“SANCTIONED” INDIVIDUALS AND COUNTRIES**

Doing business with certain individuals and with or within certain countries may be prohibited by trade or economic sanctions. Sanctions may impose a complete ban on all transactions while others may be limited to a particular type of transaction. Scoular does not do business with any sanctioned country or individual unless permitted by law. If it appears that any portion of your business may in any way involve a sanctioned individual or country, seek assistance from the Legal Department before proceeding further.

### **CONFIDENTIALITY AND INTELLECTUAL PROPERTY RIGHTS OF OTHERS**

Scoular respects the confidential information and intellectual property rights of our competitors and other third parties. Intellectual property includes trademarks, copyrights, patents and trade secrets. If you possess or receive confidential information of others, you are prohibited from using that information in support of your work for Scoular. If any Scoular employee suggests or directs you to share a third parties' confidential information or intellectual property, you must report the concern immediately to the Legal Department.

### **BUSINESS GIFTS AND ENTERTAINMENT**

Gifts and entertainment of reasonable and customary value, when used correctly, are customary and promote good will and reinforce business relationships. In certain cultures, gifts may be customary and/or expected. However, gifts or entertainment of more than customary value may be intended or expected to influence or have the appearance of influencing the judgment or decision-making process of another and thus are prohibited. Please contact the Legal Department for further guidance applicable to our operations and/or to request an exception for offering a gift or entertainment that exceeds customary value.

## **We Protect Scoular's Information, Assets and Interests**

### **CONFIDENTIAL INFORMATION**

In the course of our work, many of us have access to confidential or proprietary information about Scoular, our customers, suppliers, business partners and others. Each of us must be vigilant to safeguard Scoular's confidential information as well as the confidential information of others. We keep all confidential information secure, limit access only to those who have a "need to know" and use it only for permitted purposes. We will not knowingly induce others to breach confidentiality obligations they owe to third parties.

### **SCoulAR ASSETS**

Scoular assets include physical property such as buildings, machines, and inventories, as well as intangible assets such as confidential information, inventions, business plans and ideas, whether stored on paper, computer media or as individual knowledge. All Scoular assets must be protected and used efficiently and for legitimate business purposes only. We are responsible for the Scoular assets under our direct control. We will be attentive to security procedures and alert for situations that may lead to loss, theft, or misuse of Scoular assets. Scoular will not tolerate theft, fraud, embezzlement or misuse of Scoular assets.

We rely heavily on computer assets to meet operational, financial and other requirements. These systems and related data files are important assets of Scoular's. We use Scoular information technology and personal devices in accordance with Scoular policies, practices and protocols to protect our technology, data and content.

We may use Scoular assets—including electronic media, phones and email—for limited, personal use if the use is reasonable, does not interfere with our work performance and it is not inappropriate. For more information about use of electronic and communication systems, U.S. employees can refer to Scoular's Acceptable Use Policy, available at [www.soularpeople.com](http://www.soularpeople.com). Employees outside of the U.S. should contact their human resources representative about policies applicable to your worksite.

### **USING SOCIAL MEDIA**

Communicating via social media, i.e. Facebook, Twitter, Snapchat, LinkedIn, Instagram and other online forums, blogs, newsgroups, chat rooms or bulletin boards is a regular part of the lives of many employees. When using social media, do not share Scoular confidential or proprietary information. Additionally, do not give the impression that you are speaking on behalf of Scoular unless you are expressly authorized to do so. Note that this Code does not restrict an employee's legal right to discuss the terms and conditions of his/her employment.

### **ENGAGING IN APPROPRIATE BUSINESS COMMUNICATIONS**

In your role as an employee of Scoular, when you communicate with your internal and external business partners, you are representing Scoular and its brand. You should be professional in all of your communications, as well as representing Scoular's expectations around integrity and ethical business conduct. That includes your verbal and written communications, including emails and instant messages. All communications by you in your role at Scoular should comply with the expectations of conduct described in this Code.

### **COMMUNICATING WITH THE MEDIA**

So that Scoular's communications are clear, consistent, and responsible, only personnel authorized by Brand Marketing and Corporate Communication will speak with the media on behalf of Scoular. If you receive an inquiry, refer the request to your manager or Brand Marketing and Corporate Communications. If you engage with the media on personal matters, be sure that you make clear your views are yours and you are not speaking on behalf of Scoular.

## CONFLICTS OF INTEREST

Everyone is expected to make business decisions and take actions based on the best interests of Scoular. A conflict of interest occurs when your interests or activities—or those of your immediate family members, relatives and friends—interfere, or appear to interfere, with your professional responsibilities or the best interests of Scoular. If you have any question as to whether your participation in an activity may give the appearance of a conflict of interest, speak with your manager or the Legal Department. In particular, you must notify your supervising Senior Leadership Team member before you trade agricultural commodities for your personal account. In addition, you must notify your manager and your supervising Senior Leadership Team member if you own a large amount of equity in an agricultural company other than Scoular. This does not include owning stock in a publicly traded company unless the ownership is large enough to influence the decisions of that company. Note, however, that employees who have access to confidential (or “inside”) information are not permitted to use or share that information for investment purposes.

Business dealings must not be influenced, or even appear to be influenced, by personal or family interest. Certain situations where a real or potential conflict may exist include:

- When a person with a family or close relationship with you reports to you. If this type of relationship exists or develops, disclose it to Human Resources so that appropriate steps can be taken to resolve the conflict.
- The giving or receiving of gifts or entertainment from third parties may be perceived as a potential conflict of interest. Such gifts or entertainment must be of a nominal amount and must not be done to influence a certain business decision.
- Working for a competitor or supplier as an officer, employee, consultant or member of its Board of Directors potentially causes a conflict of interest and is not permitted without the prior, written approval of Scoular's Chief Executive Officer.
- Competing with or pursuing opportunities personally that are similar to Scoular business opportunities may also create a conflict of interest. Contact the Legal Department before pursuing such opportunities.

## **We Keep Accurate Business Records**

We keep accurate records that fairly reflect our business transactions.

We are responsible for the accuracy, confidentiality, and integrity of Scoular business records of all kinds. We are clear, concise, truthful, and accurate as possible when recording information. We do not conceal or confuse any records or make false or misleading entries. If you have any concerns about how to enter a particular item—be it your attendance and time worked, contract entries, weights, grades, lab results or expense reports—seek assistance. If you are being asked to enter an item in a manner you believe is questionable, false or misleading, speak up. You should only sign documents, including contracts, that you are authorized to sign, and you believe are accurate, complete and truthful.

We maintain and preserve all business records in accordance with applicable law and Scoular's document retention policies, practices and protocols. If you need assistance or guidance, please contact Scoular's Legal Department so they can assist you in applying Scoular's document retention practices.

The information in our business records is relied upon by many and serves as the foundation for our financial statements as well as completing government reports and returns for tax, regulatory and statistical purposes. We compile and present all information in our financial statements or government reports and returns in accordance with all applicable law and Scoular's policies, practices and protocols (including its internal controls).

### **SUPPLIER RELATIONS**

We purchase products and select suppliers based on need, quality, service, price and appropriate terms and conditions. All supplier relationships are conducted by way of appropriate written contract or purchase orders.

## **We Contribute as a Global Corporate Citizen**

### **GRAIN, FOOD AND FEED SAFETY**

The quality of our grains, oilseeds, and feed and food ingredients, and the safety and well-being of our customers and those that consume our customers' products are our top priorities.

### **HUMAN RIGHTS**

We are committed to and support international efforts to promote and protect human rights. We will not tolerate abuse of human rights in our operations or in the operations of our supply chains. We will not use or knowingly do business with suppliers who engage in human trafficking, employ forced or child labor, or use corporal punishment to discipline employees, regardless of whether such practices are permitted by applicable local laws.

### **SUSTAINABILITY**

Every day at Scoular, we define what's possible and make decisions that carry great responsibility. Our influence spans the global agricultural supply chain, and the sustainable solutions we provide, become the links that connect our world. Recognizing our role as a global citizen, Scoular has created a long-term sustainability strategy that reflects the high integrity business practices we have always believed in. Scoular's sustainability strategy focuses on five key pillars:

- Engaging in our communities
- Fostering responsible marine product sourcing

- Promoting diversity and inclusion
- Reducing our carbon footprint
- Upholding workplace health and safety

These pillars help Scoular and its employees measure the positive impact we strive to deliver for the future of our industry, our communities and our planet.

## THE ENVIRONMENT

We understand that as we operate our business around the world, we have an opportunity to help improve the environment and conserve natural resources. We are committed to sustainability and support efforts to protect the environment. We will comply with applicable environmental laws wherever we operate. All employees have responsibility to ensure they comply with environmental regulations that apply to their jobs and to report any violations of environmental incidents.

## CONTRIBUTION TO OUR COMMUNITIES

Scoular believes in giving back to our communities. Scoular has established The Scoular Foundation, which supports organizations and projects to help others in and around the communities where we do business and our employees live.

## Reporting a Concern

Each of us is not only accountable for exercising good judgment and acting consistently with this Code, but also for reporting Code violations that we experience or are brought to our attention. It takes courage to report possible violations, but it is the right thing to do.

### IF YOU --

- see or suspect someone acting inconsistent with our commitment to safety, integrity, and upstanding business conduct, our values, this Code, or Scoular policies, practices or protocols;
- see or suspect something that seems wrong or otherwise suspect any illegal or inappropriate behavior; or
- have a question about what to do,

### SPEAK UP OR ASK FOR HELP BY --

- talking to your manager;
- contacting the next level manager or another member of management; or
- contacting the Chief Human Resources Officer – Kelli Eickhoff:  
2027 Dodge Street, Suite 200  
Omaha, NE 68102  
(402) 344-1328  
[keickhoff@scoular.com](mailto:keickhoff@scoular.com)
- contacting the Senior Vice President and General Counsel – Megan Belcher:  
2027 Dodge Street, Suite 200  
Omaha, NE 68102  
(402) 449-1448  
[mbelcher@scoular.com](mailto:mbelcher@scoular.com)

Additionally, because Scoular is committed to compliance and encourages employees or Third Parties to report violations or potential violations of the Code, such violations may also be submitted via our

Scoular complaint hotline OpenDoor, managed by our outside third-party provider EthicsPoint. Reports to EthicsPoint can be made via the EthicsPoint website or calling the hotline. Scoular's ethics hotline allows for complaints to be reported on a confidential and anonymous basis, subject to local law.

To make a report to EthicsPoint, visit [scoular.ethicspoint.com](https://scoular.ethicspoint.com) and follow the prompts, or report the concern by phone:

**U.S. and Canada: 855-845-3451**

**Argentina: 0800-444-6303**

**China: 4006013692**

**Mexico: 001-844-451-7908**

**Indonesia: 800-140-1984**

**Singapore: 800-110-2212**

**Uruguay: 000-410 (at English prompt dial 855-845-3451)**



In raising your concern, be as specific and detailed as possible so that your situation and concerns can be understood fully by the person receiving the information. Note that different countries handle reports of violations or suspected violations differently. If you have questions, contact the EthicsPoint hotline for guidance or contact the Legal Department.

Reports of violations or potential violations of this Code, when made in good faith, will be kept confidential to the extent permissible by law and as possible with regard to our ability to investigate and address concerns. Scoular takes claims of retaliation seriously and we have zero tolerance policy for retaliation or related inappropriate conduct. If you believe you or someone you know has been subject to retaliation for speaking up, contact Scoular's General Counsel, its Chief Human Resources Officer, or use Scoular's hotline described above immediately.

## **MANAGING AND INVESTIGATING VIOLATIONS OF SCoular'S CODE OF CONDUCT**

As employees of Scoular, we are all accountable for following this Code and speaking up when we know or suspect behavior that is inconsistent with it. Scoular investigates reports of alleged unlawful or unethical conduct and will take appropriate action.

Participation with internal investigations is a condition of your employment with Scoular. Providing false or misleading information, failing to cooperate with an investigation, or encouraging others not to participate fully in an investigation are violations of this Code.

Employees who fail to comply with our Code and related policies, and who fail to report suspected or actual violations of this Code, may face disciplinary action up to and including termination of employment. Similarly, Scoular may cease to do business with Third Parties whose actions are inconsistent with this Code, and we will not allow Third Parties to engage in unethical or illegal behavior on our behalf. Prior to engaging a Third Party you should take reasonable steps to be sure the Third Party understands Scoular's standards of ethical behavior and that the Third Party agrees to adhere to the spirit of this Code.



*Requests for printed copies of this document may be directed to:*  
*[codeofconduct@scoular.com](mailto:codeofconduct@scoular.com)*

