



Casey's

9

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SUMMER FREEDOM  
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Casey's presents



Code of Conduct and Ethics



## A MESSAGE FROM OUR PRESIDENT AND CEO

Dear Friends,

From our humble beginnings in Boone, Iowa, to today's over 2,500-store footprint across 16 states, we have been – and remain – a trusted friend and neighbor. This kind of trust sets Casey's apart and is something that, together, we've worked hard to earn, one day, one slice, and one fuel fill-up at a time. We view each visit with our guests as an opportunity to continue to build upon that trust and to grow our business and the communities we call home.

Our Code of Conduct and Ethics is an important part of doing things the right way and being Here for Good for our guests and fellow Team Members. It reflects the way we've been doing business for more than 50 years – ethically, lawfully, and with integrity. It also provides us with the tools and resources to help when the right action or the right decision isn't obvious.

I urge you to rely on our Code anytime you need a helping hand at work. The Code is a reliable resource and provides information you can use to continue being your best and preserving the trust that our Team Members, communities, and investors have placed in Casey's.

Thank you for your commitment to Casey's,

**Darren Rebelez**

President and CEO





# OUR PURPOSE AND VALUES

## OUR PURPOSE

To make life better for communities and guests every day.

## OUR VALUES

Our values are the same for all Team Members; they are the foundation of our character and are at the core of what makes us great as a Team. Casey's truly CARES, and our values unite all of us into a Team dedicated to serving each other, our guests, our shareholders, and our communities.



Casey's  
CARES

### COMMITMENT

We work hard to be the best and have a good time doing it.

**Ownership | Dependability | Passion**

We take initiative and own our impact – large and small, near and far.

We can be counted on to consistently deliver quality, convenience, and results.

We're fully engaged and have fun with our work and each other.

### AUTHENTICITY

We're true to our roots by being high integrity and low ego.

**Humility | Transparency | Integrity**

We think big and play big, but our ego is small.

We're open and honest, even when it's tough.

We do what we say and earn others' trust.

### RESPECT

We treat people the way they want to be treated.

**Inclusion | Empowerment | Recognition**

We embrace differences and believe all voices have value.

We trust and support each other to do the right thing.

We recognize and appreciate what each person brings.

### EVOLVING

We're driven to build a better future for ourselves and our business.

**Learning | Development | Agility**

We challenge ourselves and each other to learn from successes and mistakes.

We recognize potential and invest in ourselves.

We drive positive change and grow our business.

### SERVICE

We put service first and take pride in caring for our guests, our communities, and each other.

**Guests | Community | Team Members**

We strive to provide an excellent guest experience by being Positive, Polite, Professional, and Proud.

We're here for good to strengthen and sustain our communities.

We support each other, work together, and win together as one Team.





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## OUR CODE

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## DOING BUSINESS THE RIGHT WAY

### WE LIVE OUR VALUES.

Companies often measure their success in numbers of sales, stores, Team Members, or years in business. At Casey's, we've been successful in each of those areas.

But there's one part of our business that's not as easy to measure. And it turns out, it's the most important part: delivering great guest experiences. For us, that drives every business decision, every day.

### WHERE DOES OUR CODE FIT IN?

Casey's is committed to compliance with all laws, rules, and regulations that apply to our business. Our Code helps us make sure we honor this commitment, stay true to our purpose, and ensure we grow with integrity. In our Code, you'll find:

- High-level guidance about important workplace topics.
- Tips on how to handle common ethical situations.
- Answers to everyday questions you might face.
- Decision-making tools and definitions of key terms.
- Resources to contact for help.

### WHO MUST COMPLY WITH THE CODE?

Our Code applies to all Casey's Team Members, including Officers, as well as our Board Members. We are all one Team.

All Team Members have a responsibility to understand and follow the Code. The Company strongly encourages dialogue among Team Members and their leaders to make everyone aware of situations that give rise to ethical questions and to talk about how to handle those situations. The Code reflects general principles to guide Team Members in making ethical decisions and is not intended to address every specific situation that may arise.

Every day, you make decisions that affect Casey's, other Team Members, our guests, our business partners, our community partners, and others. Our Code can help you navigate challenging situations and make decisions that align with our values.





# UNDERSTANDING OUR RESPONSIBILITIES

WE EACH DO OUR PART.

## As Team Members, we count on each other to:

- Know and follow the Code, our policies, and the laws that apply to our jobs.
- Regularly review the Code and acknowledge we understand it.
- Always act with honesty and integrity.
- Speak up if we see or suspect some form of misconduct.
- Cooperate with any requests for information or investigations into misconduct.
- Ask questions if we are ever unsure what to do.

## Leaders have additional responsibilities:

- Promote a respectful workplace where open communication is valued.
- Talk to Team Members about how the Code and other policies apply to our daily work.
- Look for opportunities to discuss ethical dilemmas and challenging situations with our Teams.
- Respond quickly and effectively when a question or concern is brought to our attention.
- Report violations of the Code or the law when necessary.
- Take action to prevent retaliation against anyone who reports a concern in good faith.

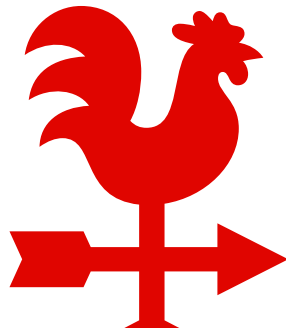
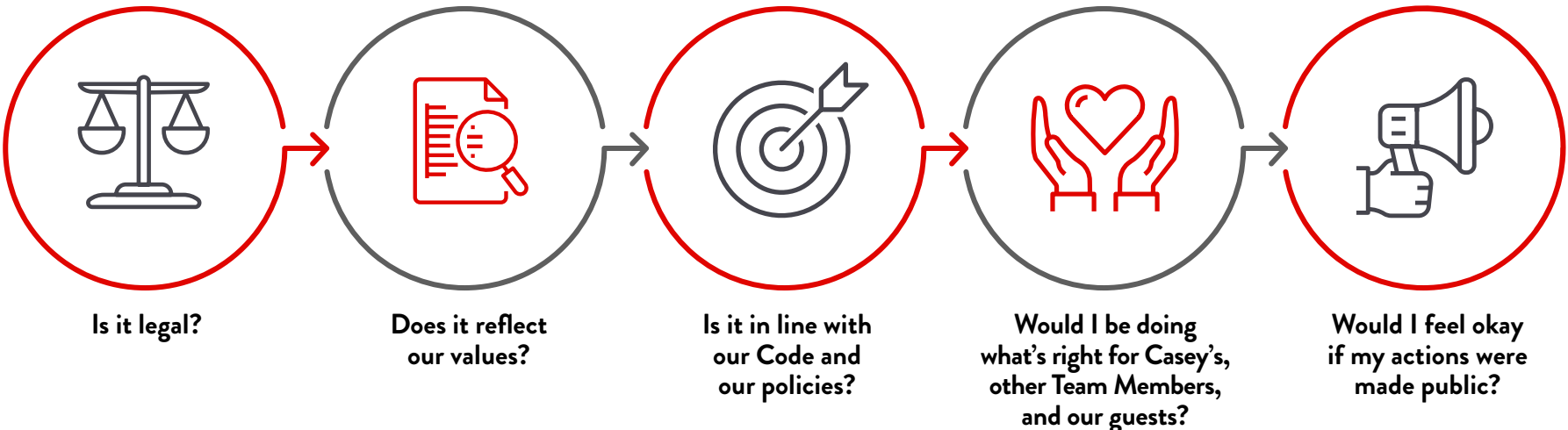


# MAKING GOOD DECISIONS

WE ASK FOR HELP WHEN WE NEED IT.

The Code doesn't have the answer to every situation, and there may be times when you're unsure what to do. Always remember, when you have a tough choice to make, you're not alone. There are resources available to help you.

### Not sure? Ask yourself:



If you can answer "yes" to all five questions, it's probably safe to move forward, but a "no" or "I'm not sure" to any of them means you should stop and ask for guidance. Remember, in any situation, under any circumstances, it is always okay to ask for help.

Team Members should not be misguided by any sense of loyalty to the Company or a desire for profitability that might cause them to violate these standards. Team Members who violate the Code will be acting outside the scope of their employment and will be subject to disciplinary action.





# CASEY'S VALUES OUR TEAM MEMBERS, PARTNERS, AND CULTURE

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# RESPECT FOR ALL

**Our Team Members are our greatest strength.** Look around you – at Casey’s, you’ll see Team Members with a variety of ideas, experiences, and backgrounds, all coming together to give our guests our very best. This “variety” – this diversity – is one of our values. Treating each other with respect and dignity makes our Company stronger and better.

## WHAT CAN YOU DO TO PROMOTE RESPECT AT CASEY’S?

You can foster a culture of belonging and empowerment by:

- Living our values.
- Honoring – and celebrating – our differences.
- Treating others the way they want to be treated.
- Making sure everyone’s voice is heard and included.

Casey’s is an equal opportunity employer and follows all applicable federal, state, and local civil rights laws. Casey’s does not tolerate unlawful discrimination against Team Members or guests because of their race, color, religion, creed, national origin or ancestry, ethnicity, sex, pregnancy, sexual orientation, gender, gender identity, age, physical or mental disability, genetic information, or any other characteristic protected under applicable federal, state, or local law.

## DO YOU THINK YOU MAY HAVE SEEN DISCRIMINATION OR HARASSMENT?

Speak up. It’s the best way to preserve our respectful workplace. If you see, suspect, or experience discrimination or harassment, immediately **report your concerns** without fear, knowing that Casey’s prohibits retaliation against anyone who comes forward.



**I overheard a Team Member refer to a coworker using racist language. The coworker didn’t hear it, and I don’t want to stir up trouble, but should I say something?**

You should. It’s up to each of us to help maintain a respectful workplace. If you feel comfortable doing so, talk to the Team Member directly about what you heard. If not, report your concerns to your leader or another Company resource.

**FOOD FOR THOUGHT**  
To find out more, see our **Discrimination and Harassment Policy**.

## GOOD TO KNOW!



Through our Slice of Excellence Recognition Program, Casey’s recognizes Team Members who are living our CARES values.



## TEAM MEMBER HEALTH AND SAFETY

**Safety is a shared responsibility.** Keeping everyone at Casey's safe is not one person's or one department's job – it's everyone's job. Whether you work in our stores, our Store Support Center, our distribution centers, or on the road, we're all responsible for keeping Team Members and guests safe.

### HOW CAN YOU DO YOUR PART?

Put safety first:

- Follow all safety and physical security policies and procedures.
- Be alert! Report to work free from the influence of alcohol or any illegal or controlled substance that could prevent you or those around you from working safely and productively.
- Immediately report to your leader, your Division Asset Protection Manager, [Casey's Risk Management Team](#), or the [Casey's CARES Ethics Hotline](#):
  - Accidents or unsafe practices or conditions.
  - Threats, security concerns, or acts of violence.

### WHAT IS CASEY'S STANCE ON WEAPONS AT WORK?

Casey's prohibits Team Members from carrying firearms, weapons, whether open or concealed, or dangerous substances at any time, on premises owned or leased by Casey's (including vehicles), unless state law provides otherwise.

In those states that specifically give employees the right to maintain a lawfully possessed firearm in a locked vehicle in their employer's parking lot, you will be permitted to maintain a firearm in your own vehicle, stored as required by applicable local law.

## FOOD QUALITY AND SAFETY

**We're known for our pizza!** Our pizza and prepared foods are a core piece of who we are and how we serve our communities. We want every guest to trust that the products they buy from us meet all quality and safety standards.

### WHAT DOES CASEY'S EXPECT OF YOU?

From food handling and preparation, to proper food storage, we expect all Team Members to follow our food safety policies, procedures, and all food safety regulations. Don't come to work if you are sick, and don't cut corners – or allow others to cut corners – even when your store is busy.



## FOOD SAFETY CONCERN?

If you have questions or know of or suspect unsafe practices or a food-safety incident, report them to your leader or the [Food Safety Department](#). Whenever possible, the initial report should be made by the person who witnessed the incident.

Remember, Casey's expects all of us to participate, when needed, in any investigation relating to food quality or safety that could put our guests at risk.



### FOOD FOR THOUGHT

To find out more, see our [Food Service Manual](#), [Food Storage Policy](#), and [Food Allergens Procedures](#).



## COMPANY ASSETS

**We take care of everything that makes us Casey's.** Think about your work and all the “assets” you use to do your job. Equipment, supplies, inventory, cleaning supplies, Company vehicles – even the Casey's name and logo – are all Company assets. Taking good care of them helps us better serve our guests now, and years from now!

### WHAT DOES “TAKING GOOD CARE” LOOK LIKE?

It's treating our assets with the same care as you would treat your own things. That means:

- Using them the way they're meant to be used – to carry out Casey's business.
- Safeguarding them from waste, loss, damage, and misuse.
- Never borrowing, lending, or giving them away unless you have approval in advance from your leader.
- Practicing safe computing and good cybersecurity by:
  - Using only Casey's-approved hardware, software, applications, and storage devices.
  - Creating strong passwords and never sharing them with anyone.
  - Accessing our networks only through authorized applications and devices.
  - Never clicking on suspicious files or links that could put our systems at risk.
  - Immediately reporting a lost device or suspected data breach.



### GOOD TO KNOW!

**Only certain Team Members have the authority to buy goods and services or sign documents or purchase orders on behalf of Casey's. If you are one of these Team Members, always follow our Delegation of Authority Policy, Signature Policy, and all our procurement procedures.**

### WHAT ABOUT PERSONAL USE?

You should avoid personal use of our Company assets. Occasional use is okay, but make sure your use is truly occasional and never interferes with your or any other Team Member's job responsibilities. Using Company assets for your personal financial gain or to do something unauthorized, unprofessional, or illegal is always prohibited.

You should never have any expectation of privacy when using our systems. Anything you create, store, download, send, or receive using our systems is Casey's property and, where permitted by law, can be monitored and reviewed by us at any time.





# CONFIDENTIAL INFORMATION

**Information is a critical Company asset, too.** Information drives decisions about how we run and grow our business. It tells us what's selling well (and what's not) and how well we're serving our guests. Protecting information preserves our competitive advantage in the marketplace and makes Casey's ... Casey's.

## WHAT DO YOU NEED TO KNOW?

Recognize confidential information when you see it.

### Confidential information includes:

#### Non-public information about our Company and our business partners

Examples:

- Business and marketing plans
- Product designs
- Recipes and the way things are made
- Cost, pricing, or marketing strategies
- Financial reports
- Pending purchases and sales of property
- Potential expansion, new locations, or acquisitions



#### Personal information about Team Members, guests, and business partners

Examples:

- IP address
- Bank or credit card information
- Social security number
- Health or benefits information



**Not sure if information is confidential? Play it safe and treat it as confidential.**

## WHAT DO YOU NEED TO DO?

Protect confidential information every day.

- Use it only to carry out business and share it only with people at Casey's who are authorized to see it and need to know it as part of their job.
- Don't share confidential information with anyone outside of Casey's unless there is a business reason to do so and the appropriate protections (including a confidentiality agreement or leader permission, depending on the circumstances) are in place. If you are unsure about whether the information is confidential, or should be shared, please consult with the Chief Legal Officer.
- Be careful never to discuss confidential information in public places (such as restaurants, elevators, airports, or in our stores) where others can hear it.
- Immediately report any unauthorized disclosure of confidential information to the Chief Compliance Officer and/or the Chief Legal Officer.



### A SLICE OF LIFE

**One of my coworkers used to formerly work for a competitor and offered to tell me about some new products being developed by their former employer. Is that okay?**

No, it's not. It's usually okay to share general knowledge and skills learned from an old job. But new product ideas (including files, drawings, presentations, concepts, marketing ideas – called “work product”) would be confidential, and your coworker has a responsibility to protect that information – just as you would have a responsibility to protect our confidential information should you ever leave Casey's. Confidentiality protections continue even after you leave Casey's employment, regardless of circumstances.



## BUSINESS PARTNERS

**Good partners can help us better serve our guests.** We work with a large network of vendors, suppliers, contractors, and other third parties. Their actions – good or bad – can have an impact on our operations and our reputation. So, we're careful to choose business partners who honor their obligations and, like us, make service a priority.

### HOW DO YOU MAKE A GOOD CHOICE?

If you're responsible for sourcing products or services for Casey's, be sure to base decisions on objective criteria, such as price, quality, delivery record, and other criteria and standards as established by Casey's.

### WHAT ELSE DO YOU NEED TO DO?

Once a relationship is in place, stay involved. Monitor our business partners' performance to make sure they're meeting their obligations.

Be sure you are working with **Casey's Procurement Team**, when needed, and follow the policies put in place by Procurement when negotiating or contracting for products or services.



# COMMUNITY OUTREACH

**Making life better for our communities and our guests has been a part of who we are since our first store opened in 1968.**

We're not just a business – we're neighbors. And we take pride in strengthening communities all over the heartland where we live and work.

### HOW DO WE MAKE A DIFFERENCE ON A CORPORATE LEVEL?

Corporate responsibility lies at the core of our culture. We contribute funds, time, and talent to support both Company-wide programs and local causes (visit [Casey's Supports Communities](#) to find out more). As a Team Member, you are encouraged – but not required – to participate in these initiatives in whatever way feels right for you.

### HOW DO YOU MAKE A DIFFERENCE ON A PERSONAL LEVEL?

We encourage you to participate in the charitable activities that mean the most to you. Just make it clear that your personal views and actions do not represent Casey's, and don't use Company funds, time, or the Casey's name without approval from your leader.

Remember, whether you are participating in a corporate-related event or volunteering on a personal level, you are the face of Casey's. Your involvement and actions may not only impact how people see you, but may also impact how people see other Team Members and Casey's.

## GOOD TO KNOW!

You can learn more about Casey's environmental, social, and governance initiatives in our [Environmental, Social, and Governance \(ESG\) Report](#).





# CASEY'S CONDUCTS BUSINESS WITH INTEGRITY

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## BUSINESS RECORDS

**We are all record keepers.** A “business record” is not just data on an accounting spreadsheet. A business record is any information we record, from timesheets and expense reports to safety and regulatory inspections and sales projections. Each of us creates and maintains business records. Each of us is responsible for making sure they’re accurate.

### WHY IS ACCURACY SO IMPORTANT?

It’s about maintaining the trust of our guests, business partners, community partners, and investors. When we keep honest, clear, and complete records, we send the message that we are operating with integrity. Do your part by following our policies and internal controls, providing supporting documentation and approvals, when required, and **speaking up** if you see or suspect an error.

It is never acceptable to make false claims on an expense report or timesheet, to falsify quality or safety results, to record false sales or record them early, to materially and knowingly understate or overstate known liabilities and assets, to maintain undisclosed or unrecorded funds or “off the books” assets, or to defer recording items that should be expensed. No entry may be made that intentionally hides or disguises the true nature of any transaction.

You can also help by keeping, storing, and disposing of records as described in our Document Retention Policy and taking care to never destroy information that is subject to a legal hold. If you have a question about how long a business record or document should be retained, contact the **Legal Department**.



### WHAT ABOUT FINANCIAL STATEMENTS, DOCUMENTS FILED WITH THE SEC, AND OTHER PUBLIC DISCLOSURES?

We rely on you to help us:

- Provide complete, fair, accurate, timely, and understandable information and documents to investors, government agencies, and regulators, including the SEC and the public.
- Comply and cooperate with government audits, investigations, and inquiries.
- Watch for irregularities or inaccuracies and report any suspicious activity, including:
  - Undisclosed, unrecorded, or “off-the-books” accounts.
  - Records that appear to be falsified or mischaracterized.
  - Understated or overstated liabilities or assets.
  - Costs assigned to the wrong project, contract, or time period.



### FOOD FOR THOUGHT

To find out more, see our **Document Retention Policy**. Certain Team Members are subject to Casey’s Code of Ethics for the CEO and Senior Financial Officers.





## CONFLICTS OF INTEREST

**As Team Members, we always do what's best for Casey's.** We all have activities, interests, and relationships outside of work. When they impact your ability to make fair, objective decisions on the job, they can create a conflict of interest. Even the appearance of a conflict is a problem because it can cause others to question your motives and your loyalty to Casey's.

### HOW DO YOU KNOW IF THERE'S A CONFLICT?

Sometimes it can be hard to decide if something is a conflict of interest. One of the best ways to avoid a conflict is to know the kinds of situations where they typically arise. Some examples include:

- Investing in a company that works with us.
- Working for one of our competitors or business partners.
- Serving as a board member or consultant for a competitor or business partner.
- Hiring – or purchasing something for Casey's from – a family member, relative, or close friend.
- Using Company property, without permission, for something other than Casey's business.
- Taking for yourself an opportunity that belongs to Casey's.
- Supervising a relative.
- Doing personal business during work hours.

Of course, it's impossible to list every potential conflict. If you're not sure about a particular situation, it's always best to check. And if you see or suspect a conflict of interest, even if it's only a potential conflict, discuss it with a leader, the Chief Legal Officer, or the Chief Compliance Officer so the situation can be properly reviewed.



## GOOD TO KNOW!

Not sure if a situation you're facing presents a possible conflict?  
Ask yourself:

- 1 Could it interfere with my responsibilities at Casey's?
- 2 Could it impact the decisions I make for Casey's?
- 3 Would others (inside or outside of Casey's) think it's a conflict?

If the answer to any question is "yes" or "I'm not sure," stop and seek guidance to avoid even the appearance of anything improper.

### WHAT ABOUT RELATED-PARTY TRANSACTIONS?

A related-party transaction is generally defined as a transaction between our Company and any director or director nominee, executive officer, anyone who holds more than 5% of the Company's common stock, and the immediate families of any of these individuals. There are restrictions in place with regard to any proposed related-party transactions. Make sure anyone involved is made aware of – and complies with – these restrictions.





## GIFTS AND ENTERTAINMENT

**We won't let a gift send the wrong message.** An occasional gift from a business partner can be a normal part of building a good business relationship. However, if a gift is expensive, inappropriate, or offered too frequently, it can impact (or give others the idea that it's impacting) your objectivity. Don't let business decisions be influenced by gift-giving.

### HOW CAN YOU BE SURE A GIFT IS OKAY?

Report any gift offered or received to your leader. Your leader must then report the gift to the appropriate member of the Senior Leadership Team, who will:

- Determine if it's okay to accept the gift or if you should decline it.
- Regardless of whether the gift is accepted or declined, report the gift and any relevant details to the Chief Compliance Officer.

### WHAT ABOUT GIVING GIFTS TO OTHERS?

Don't offer a gift to a business partner without approval from your leader. We want to ensure that any gifts **we** give are a reasonable and customary part of doing business, too. Gifts should never be given to influence decisions about working with Casey's.

### WHAT ABOUT MEALS AND ENTERTAINMENT?

Business meals should always be reasonable whether hosted by the Company, Team Members, or third parties.

Excessive consumption of alcohol is never acceptable in any setting.

When the Company is hosting a dinner event, the most senior Company associate attending must pay.

Questionable entertainment, such as "adult" entertainment that may reflect negatively on the Company, is prohibited regardless of who may be hosting.



### A SLICE OF LIFE

**One of my suppliers sent me a very expensive gift basket over the holidays. It was sent to the office, and I didn't have a chance to say, "No, thank you." What should I do?**

Since it wasn't possible to decline the gift, accept it on behalf of Casey's and report it to your leader, as required by our policy. The appropriate member of the Senior Leadership Team, in consultation with the Chief Compliance Officer, will determine disposition.

## GOOD TO KNOW!

A "gift" can take many forms, including:

- Vendor merchandise.
- Tickets to a sporting event or entertainment venue.
- A gift card.
- Gift baskets.
- Access to or use of a vacation property.
- Subsidized or free travel.

Report all gifts (offered, accepted, or given) to your leader – failing to do so is a violation of our Code.





## SPEAKING FOR CASEY'S

**We send one clear message.** Although we're all ambassadors for Casey's, it's important that only certain designated Team Members speak on our Company's behalf. They can make sure that information we share about Casey's is clear, consistent, and accurate and that we meet our legal and regulatory obligations.

### WHAT SHOULD YOU DO?

If someone contacts you for information about Casey's, refer them to the right department.



#### QUESTIONS FROM REPORTERS OR THE MEDIA?

**Contact:**

The Communications Director



#### INVITATIONS TO MAKE SPEECHES OR PARTICIPATE IN EVENTS?

**Contact:**

The Senior Leadership Team Member responsible for your functional area and the Communications Director



#### QUESTIONS ABOUT LEGAL MATTERS?

**Contact:**

The Legal Department



#### QUESTIONS ABOUT FINANCIAL MATTERS?

**Contact:**

The Chief Financial Officer or the Senior Vice President of Investor Relations and Business Development



#### QUESTIONS FROM THE GOVERNMENT?

**Contact:**

The Legal Department

### BUT WHAT IF YOU KNOW THE ANSWER?

Even if you know the answer and want to be helpful, it's best to let the experts respond. One misstep, even if you meant well, can affect our reputation and our brand.

### WHAT ABOUT SOCIAL MEDIA ACTIVITY?

Social media is a great way to stay connected with family and friends, but be responsible when you're online:

- Make sure your use reflects our values and complies with our policies. Remember, your posts may influence not only the way that people see you, but also the way they see Casey's.
- Be clear that any opinions you post represent your own thoughts and views, not those of Casey's. Never share or disclose confidential information.





## MATERIAL NON-PUBLIC INFORMATION

**We comply with insider trading laws.** As Casey's Team Members, we may hear or see material information about our Company or companies we work with that isn't known to the public. Using that information to buy or sell stock or securities, or while in the possession of such information, or telling others about it so they can do so ("tipping") – is called "insider trading." Insiders are prohibited from hedging and pledging Casey's stock.

### HOW CAN YOU DO YOUR PART?

Casey's is a publicly traded company and is listed on the Nasdaq Stock Market. Anyone can become a shareholder by purchasing Casey's stock. If you have material non-public information, then trading based on that information gives you an advantage, creates an unfair playing field, and can lead to serious consequences.

Make sure:

- You know the kinds of information considered material, non-public information.
- You never trade based on material, non-public information.
- You never share material, non-public information with others, including relatives, friends, brokers, or members of the investment community.

Certain Team Members have additional trading restrictions. Check our Insider Trading Policy for more information.

### WHAT IF YOU'RE NOT SURE IF INFORMATION IS INSIDE INFORMATION?

It's best to assume it is and seek guidance before proceeding. Talk to the Chief Legal Officer if you have any questions about the law or our policies or if you have questions about what you may communicate to others.





## COMPETITION AND FAIR DEALING

**We can be counted on to do business the right way.** It's not just what we do, but the way we do it that makes us successful. We put our guests first and compete based on the quality of our products and services. By working with integrity, we build connection, we build loyalty, and together, we build our future.

### WHAT DOES IT MEAN TO DEAL FAIRLY?

It means promoting free and fair competition and complying with antitrust and competition laws. It means outperforming our competitors fairly and lawfully and steering clear of discussions with them (or with guests or business partners) about competitively sensitive topics.

It also means gathering information about our competitors the right way, by reviewing public sources and guest feedback – never by illegal or unethical means such as stealing or breaching confidentiality. Never deceive anyone, pay anyone, or misrepresent who you are or who you work for in order to obtain confidential information about our competitors.

### HOW ABOUT OUR MARKETING AND ADVERTISING?

We're open and honest, even when it's tough – that's part of being authentic, one of our Casey's CARES values. Tell the truth when talking about our Company and our products. Never make claims that are untrue, and never take unfair advantage of anyone.

### ANYTHING ELSE?

Yes. Always make decisions based on what's best for our guests and our Company, not based on **favoritism or personal relationships**, not on **improper gifts** and not on bribery. That's just not the way we do business.



## GOOD TO KNOW!

Competitively sensitive topics include:

- Raising, setting, or holding (“fixing”) prices.
- Dividing up markets, territories, or guests.
- Preventing another company from entering the market.
- Refusing to deal with a particular competitor, supplier, or guest.
- Interfering with the competitive bidding process.
- Agreeing with another employer not to hire each other's employees.

Questions? Contact Casey's Chief Legal Officer or Chief Compliance Officer for guidance.





## **CASEY'S SUPPORTS A SPEAK-UP CULTURE**

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# RESOURCES TO HELP YOU

We rely on you to help keep Casey's a great place to work. If you see or suspect that a Team Member or business partner has violated our Code, our policies, or the law, immediately report your concerns.

## HOW TO REPORT CONCERNS

<p><b>The Casey's CARES Ethics Hotline</b> available 24/7, via:</p> <p> <b>(844) 713-1132</b> or</p> <p> <a href="http://caseys.ethicspoint.com">http://caseys.ethicspoint.com</a></p>		<p> <b>Casey's General Stores, Inc.</b> One SE Convenience Blvd. Ankeny, IA 50021-8045</p>				
		<p>ATTN: Human Resources Department <a href="mailto:HRsupport@caseys.com">HRsupport@caseys.com</a></p>	<p>ATTN: Chief Executive Officer <a href="mailto:CEO@caseys.com">CEO@caseys.com</a></p>	<p>ATTN: Chief Legal Officer <a href="mailto:CLO@caseys.com">CLO@caseys.com</a></p>	<p>ATTN: Chairperson of the Audit Committee <a href="mailto:CAC@caseys.com">CAC@caseys.com</a></p>	<p>ATTN: Chief Compliance Officer <a href="mailto:CCO@caseys.com">CCO@caseys.com</a></p>
Harassment or discrimination	✓	✓				
Violations of our Code, policies, or the law that are <b>not</b> financial in nature	✓		✓	✓		
Inappropriate conduct by the Audit Committee Chairperson or the Chief Executive Officer	✓			✓	✓	
Violations of our Code, policies, or the law that are financial in nature (accounting or auditing matters)	✓			✓	✓	✓





## HOW TO REPORT CONCERNS

WE SPEAK UP WHEN SOMETHING ISN'T RIGHT.

### CAN YOU REPORT ANONYMOUSLY?

You may submit your concern anonymously (through the Casey's CARES Ethics Hotline or in writing), but providing contact information (such as your phone number, email address, physical address, etc.) will allow us to follow up if needed and ask additional questions to help us properly investigate your report.

### HOW DOES THE CASEY'S CARES ETHICS HOTLINE WORK?

The Hotline web portal and phone line are available 24 hours a day, seven days a week. When you contact the Hotline, trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns, and forward a written report to Casey's for further investigation.

### WHAT HAPPENS AFTER YOU REPORT A CONCERN?

Regardless of who you contact, your report will be promptly addressed and handled confidentially to the extent a thorough investigation will allow.

If you reported your concern through the Hotline, you will receive an identification number so you can follow up on your concern. With this identification number, you can track the resolution of the case, but please note that out of respect for privacy, Casey's won't be able to inform you about individual disciplinary actions.

Team Members have a responsibility to cooperate in any review, evaluation, or investigation of reported violations.

### WHAT IF I FEEL UNCOMFORTABLE COMING FORWARD?

Speaking up is never easy, but it's always the right thing to do. We can't correct problems we don't know about. Ignoring bad behavior – or waiting for someone else to say something – can make a bad situation worse.





## NO RETALIATION

WE COME FORWARD WITHOUT FEAR.

Casey's prohibits retaliation against anyone who:

- Makes a good-faith report about a known or suspected violation of our Code, our policies, or the law.
- Refuses to engage in unlawful conduct.
- Assists in the investigation of a reported violation.

If you experience or suspect retaliation, reach out to your leader or the **Casey's CARES Ethics Hotline** immediately. Casey's will investigate any reports of retaliation and take appropriate action.

### GOOD TO KNOW!

Sharing a concern in good faith means you have an honest belief that there is a violation of our Code, our policies, or the law.



#### A SLICE OF LIFE

**My leader has told me to do something that violates a Company policy. I know I should tell someone, but I'm afraid that if my leader finds out, they will make my job difficult for me. What should I do?**

Don't engage in the conduct; speak up. The best place to raise your concerns would typically be with your leader, but since it is your leader's actions that concern you, contacting the Casey's CARES Ethics Hotline is a good option. Reporting through the Hotline will give you the assurance of knowing that Casey's is looking into the situation and that retaliation by your leader or others will not be tolerated.

## VIOLATIONS AND DISCIPLINARY ACTION

WE TAKE VIOLATIONS SERIOUSLY.

We honor our values – they reflect who we are and what's important to us. That's why any Team Member who engages in conduct that disrespects our values by violating our Code, our policies, or the law – or encourages others to do so – may be subject to disciplinary action, including termination of employment, civil prosecution, and claims for damages or losses.

Nothing in our Code prohibits or restricts Casey's from disciplining or discharging Team Members who engage in misconduct whether or not the misconduct is expressly covered by our Code.

## UPDATES AND REVISIONS

Our Code may be updated and revised periodically. All updates and revisions are subject to approval of the Board of Directors and will be distributed promptly for Team Member review.

## WAIVERS OF THE CODE

Any waiver of this Code for Team Members may be made only by the Board or a Board committee and will be promptly disclosed as required by law or stock exchange regulation.

