

## CODE OF CONDUCT

Dot Foods has been a family business since 1960 and has worked to provide a positive and ethical culture for all of its stakeholders. This culture is essential to our customers, partners, employees, and shareholders in their efforts to be successful. Part of that commitment is to operate the business with integrity. This is done through our actions and our commitment to an ethical way of doing business. The code of conduct we are committed to is embedded throughout our Employee Handbook, which is given to every employee on their first day at Dot Foods and reinforced directly and indirectly through the course of normal business. All Dot employees are expected to follow this code. The particular sections where conduct is addressed in the Employee Handbook are as follows:

### **Dot Safety Policy Statement**

At Dot Foods and Dot Transportation, employee safety is not just a commitment or a value: safety is an expectation. This means everyone – from senior managers to employees at every level and location – shares the responsibility to create and maintain a safe work environment. As a leader in supply chain management and logistics, Dot broadly defines that environment to include not just our facilities, but also our corporate fleet and our communities.

#### **Dot is committed to creating a safe workplace by:**

- Developing safety programs and practices that are integrated into everything we do. Proactively weaving safety into all activities at Dot will also help us meet the expectation of our external and internal customers.
- Communicating openly about our safety performance with our employees and communities.
- Striving to be one of America's Top 100 Employers, which includes nurturing a safety-oriented culture and challenging ourselves to seek ways to improve our safety processes.
- Providing training and education to ensure each employee has the tools and knowledge to work safely.
- Establishing high standards, best practices and accurate metrics to achieve consistency and continuous improvement in workplace safety.

#### **Dot is committed to delivering safe product:**

- Developing food safety programs and good manufacturing practices (GMPs) that are integrated into all operations.
  - Providing training and education on GMPs, Work Place Safety, Food Safety, and Food Defense.
  - Establishing Sanitation and Pest Control programs, as well as routine preventive maintenance for all systems and equipment.
  - Establishing temperature checks and controls for product, equipment, and warehouse.
  - Assessing vulnerabilities to deliberate contamination of product and planning to reduce those risks.
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- Working safely at all times and encouraging safe behavior among co-workers.
  - Operating equipment and machinery safely.
  - Following all Dot safety practices and procedures.
  - Working free from the influence of any substance that could prevent or impair safe work habits.
  - Making an individual commitment to continuous improvement through ongoing Dot safety training.

### **Equal Employment Opportunity**

Dot believes all persons are entitled to equal employment opportunities. Dot will not discriminate against its employees or applicants for employment because of sex, race, color, religion, national origin, age, sexual orientation, disability, or veteran status or other basic classes protected by applicable federal or state law provided they are qualified for employment or for existing positions.

In supporting the Americans with Disability Act, Dot will make reasonable accommodations for those individuals who qualify as a disabled person and request in writing a need for an accommodation. A person is disabled if that person has a physical or mental impairment that substantially limits him or her in one or more major life activities. For Illinois employees only, Dot will make reasonable accommodations for employees who have conditions related to a pregnancy or childbirth. If you need a reasonable accommodation as an employee with a disability or an Illinois employee with a condition related to pregnancy or childbirth, please contact the Vice-President of Human Resources at 217-773-4411.

Any employee (or applicant for employment) who believes he/she has been treated unfairly should promptly report the incident to his/her supervisor (or the department manager, or Vice-President of Human Resources if the supervisor is involved in the matter being reported), who will investigate the matter and take appropriate action. All complaints will be kept confidential to the maximum extent possible.

Dot prohibits any form of retaliation against any employee for making a bona fide complaint under this policy or for assisting in a complaint investigation. However, if, after investigating a complaint of harassment or unlawful discrimination, Dot determines that the complaint is not bona fide or that the employee has provided false information regarding the complaint, disciplinary action may be taken against the complaining party.

## **Inclusion & Diversity**

We value the insights and innovation of our diverse work force and leverage that diversity to create and maintain an inclusive environment to drive personal and profitable growth. Our vision is to strive to create an environment of acceptance, development, and opportunity where every employee feels included and valued. We do this by working with leaders around the organization to create an inclusive work environment that encourages and accepts the free exchange of ideas.

Dot Foods is committed to nurturing an inclusive and diverse work environment in every location and at every level of our company. We have identified Inclusion & Diversity Hallmarks as an expectation for all employees:

- Choosing your words
- Leaving no one behind
- Speaking up
- Encouraging all to succeed
- Showing curiosity
- Including our business partners

There are five guiding principles and accountabilities we all share. They provide the “how” of accomplishing our inclusion and diversity plan. Guiding principles will not change over time, even as we update our plan.

1. Inclusion and diversity consistent with our values is our way of doing business.
2. We respect and leverage differences to empower each individual to bring his/her full self and capabilities to his/her work.
3. We hold every employee accountable for our Inclusion and Diversity Vision in our workplace.
4. We regularly plan and measure our Inclusion and Diversity progress.
5. Our differences contribute to our success.

## **Employment Management Relations**

### **OPEN DOOR POLICY**

We encourage you to bring your problems to your supervisor or any other member of management whom you believe can help you. We, in turn, promise to listen with respect and do our best to solve the work-related problems. Management accepts the responsibility to provide fair working conditions, competitive pay, and benefits. We believe you, as an employee, have an individual right to speak for yourself. You do not need a union or an outsider to speak for you.

Dot is a non-union organization. We always have been, and it certainly is our desire to maintain this status. No company is free from day-to-day problems, but we believe we have Human Resources policies and practices to help resolve problems more effectively than strikes or other work stoppages. Furthermore, unions cannot guarantee your job, nor can they assure you continuous employment. All of us working together to make our organization a viable customer-service-focused-organization is the only way we can provide a satisfactory employment situation.

## **Employee Hotline**

Dot maintains a hotline reporting system that allows employees to report various incidents to the CEO of Dot at any time. The Employee Hotline number is (800) 390-3498, extension 3930. Call to report the following: Business Abuse, Crimes, Property Damage, Harassment, etc. We guarantee that all calls will be confidential and be responded to personally.

## **No Theft Allowed**

Dot encourages all employees to take an active role in preventing theft of Dot property. You are trusted when you are employed and we expect honesty at all times from all employees. Therefore, Dot will not tolerate theft, and it is every employee’s responsibility to report any knowledge of theft to his/her supervisor, member of management, an officer, or call the Theft Hotline at 800-973-9273. All calls to Theft Hotline are confidential.

## **Personal Use of Company Property & Assets**

All company property is to be used for business purposes only. All other use of company property other than business has to be approved by your supervisor. Some examples of company property are credit cards, office supplies, copy equipment, company vehicles, long-distance calls, and maintenance equipment. An example of improper use of company property is an employee making copies of a flyer on a company copy machine for an employee’s garage sale.

## **Prohibited Conduct**

- a. Sexual Harassment: Sexual harassment will not be tolerated at the Company. Sexual advances, requests for sexual favors, or other verbal or physical actions of a sexual nature that have the purpose or effect of creating an illegal, hostile work environment will not be permitted.
- b. Other Harassment: Harassment based on race, color, religion, national origin, age, sexual orientation, veteran status, disability or any other unlawful harassment is also prohibited. Discriminatory intimidation or conduct that has the purpose or effect of creating an illegal, hostile work environment will not be tolerated at the Company.
- c. Supervisor/Manager Conduct: Supervisors and managers are responsible for maintaining a work environment free from unlawful harassment and must report anything they hear or observe that may constitute a violation of this policy. No

supervisor or manager has the authority to condition any tangible job benefit on an employee's acceptance of any unlawful harassment and threats of any such harassment must be reported immediately. If any employee believes that he or she has been deprived of a tangible job benefit (such as a significant change in employment status, like discharge or demotion), because the employee refused to cooperate with unlawful harassment, he or she should report this action immediately.

d. Examples: Prohibited conduct under this policy encompasses a broad range of verbal and physical actions. Examples include, but are not limited to, engaging in sexual favoritism or retaliation based on the granting or refusal of sexual favors, making sexually offensive or suggestive jokes or remarks, subjecting another employee to unwelcome pressure for dates and making derogatory comments based on a person's race, national origin, sex, religion, color, sexual orientation, disability, or veteran's status.

## 2. Reporting of Illegal Harassment Required

A. Any person who believes that he or she has been subjected to words or conduct that violate this policy, or who learns of such offensive words or conduct even if not personally involved, should report such, preferably in writing, as soon as possible to one of the following:

- Chief Executive Officer (CEO)
- President
- Vice President of Human Resources
- Head of his or her Department
- His or her Immediate Supervisor

If the individual believes that any of these people are responsible for the words or conduct that violates the policy, then that person is not the appropriate person with whom to report the incident. Therefore, in that situation, please select an alternate person from the list with whom to report the alleged violation.

b. The complaint should include the material details of the incident or incidents, the names of the individuals involved and the names of any witnesses.

c. The Vice President of Human Resources or an alternate designee will promptly investigate all complaints of violations of this policy. Corrective action will be taken as determined by the Company to be appropriate under the circumstances and subsequently communicated to those individuals with a need to know.

d. All complaints of violations of this policy are considered confidential and all parties involved in the complaint or investigation are expected to take reasonable steps to protect the privacy of the individuals involved.

## 3. Penalties

Violation of this policy by an employee, whether directed at another employee, an applicant for employment, a contractor or a business visitor, is grounds for disciplinary action, up to and including immediate termination.

## 4.No Retaliation

No one who makes a complaint of unlawful harassment in good faith, or who provides information for a complaint investigation in good faith, will be retaliated against by loss of a tangible job benefit or otherwise, even if unlawful harassment is not proven. However, if you make a false or frivolous accusation of unlawful harassment or provide inaccurate or misleading information in connection with a complaint investigation, you may be subject to discipline, up to and including discharge.

## **Confidential Information**

Intellectual property consists of products of the mind, such as abstract concepts, informational notes, and expressions that are protected by law. Examples of intellectual property at Dot are Supply chain tools such as Cost to Serve (CTS) – Formal and Express, activity-based purchasing tools such as What If and Forward Buy, and customer profitability tools Profit Beyond Price and The Dot Value Tool. It also includes service marks, trademarks, and software programs created by employees in their work at Dot Foods.

All these products that are developed while working at Dot Foods are the property of Dot Foods. Employees are not allowed to use any of these to personally benefit themselves nor can they use them after they have left employment at Dot Foods. Employees must vigorously protect the company's rights to this intellectual property and see it is not used by others without permission of Dot Foods.

The company has developed and maintains certain confidential business information that is not generally known by the Company's suppliers, competitors or customers such as business methods, sales history, pricing, operating techniques and practices, corporate financial information, customer lists, financial data, strategic planning, and other confidential matters relating to the business, all of which are collectively referred to as the "Confidential Information". Confidential Information is a valuable asset, the disclosure of which could cause substantial injury to the Company. Employees shall not knowingly or unknowingly divulge or allow access to any person or company, any Confidential Information or otherwise use such information for any purpose whatsoever other than in furtherance of their job duties.

## **Email/Internet/Voicemail Policy**

Electronic Communication Equipment: E-Mail/Internet/Voice Mail Policy/Fax, etc.

Dot employees have access to various types of electronic communication technology consisting of e-mail, facsimile machines, voice mail, and the Internet. The purpose of having electronic communication technology available to our employees is for the benefit of enhanced efficiencies in communication and information for our internal and external customers. We highly encourage our employees to learn and use the Dot electronic communication technology.

We understand that, from time to time, the Dot electronic communication technology may be used for personal reasons. And, like with the use of company phones, personal use must be held to a minimum and not interfere with productivity or the ability to get your job done as expected.

Employees should have no expectation of personal privacy when they use company-owned electronic communication technology. Dot employees should always be mindful of the fact that documents or communications created on or communicated via Dot-owned systems are considered business records and the property of Dot Foods, Inc. As such, they may be subject to review by third parties through litigation or under other circumstances. Also, employees should be aware that some electronic communications, such as e-mails and computer files, may be retained on back-up tapes well after the employee deleted them from his/her computer. Dot Foods, Inc. reserves the right to review or monitor any employee communication sent or received on Dot owned electronic communication technology.

Dot Foods reserves the right to block an employee's use of the Internet during working hours. This could include total non-use of Internet or just access of certain sites.

Passwords assigned to Dot employees for the use of any electronic communications systems are used to prevent unauthorized access by other employees and are to be held in confidence. Such passwords should not be construed, however, as creating an expectation of privacy for the employee who uses them.

We expect all employees to use electronic communication technology in a professional manner. Abuse of electronic communication technology is not acceptable and will be subject to discipline, up to and including termination. Unacceptable uses include but are not limited to; sending jokes, profanity, chain letters; spreading rumors, misinformation, and complaints; communication that is offensive, threatening, or could be construed in any way as harassment; pornography and or "sex" sites; solicitations for information, services, or money as per our "No Solicitation" policy; sayings of any kind (except those promoting Dot Foods' products) that are part of an employee's automatic signature; violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations, including, but not limited to, the installation or distribution of "pirated" or other software products that are not appropriately licensed for use by Dot Foods; and, excessive personal use.

Questions regarding appropriate use of Dot communication and information tools should be directed to your supervisor, manager, or Vice-President of Human Resources. Unprofessional uses of the Dot electronic communication technology should be reported to your supervisor or manager immediately.

### **Drug and Alcohol Policy**

Dot is committed to providing its employees with a safe and drug-free workplace and promoting programs, which encourage high standards of employee health. In addition, Dot expects that employees in the performance of their duties will not unnecessarily endanger other employees, customers, and the general public. For these reasons, all employees are expected to be unimpaired by drug and alcohol while at work. Under no circumstances are employees to drive company vehicles while under the influence of alcohol or drugs. Employees driving company vehicles while under the influence of drugs or alcohol will be subject to immediate termination.

Although Dot does not desire to intrude into the personal lives of its employees alcohol abuse and illegal drug use can negatively impact the workplace and Dot's ability to maintain a safe and productive work environment. Although employees make their own lifestyle choices, Dot will not accept the risks or performance problems which substance abuse can create.

### **Unlawful Harassment Prohibited**

The Company intends to maintain a work environment in which every employee is treated with respect and which is free from all forms of unlawful harassment, including conduct that creates an illegal, hostile work environment. The Company intends to provide a workplace environment that is free from harassment based on race, color, religion, sex, national origin, age, sexual orientation, veteran status, or disability.

### **Workplace Violence Policy**

Dot Foods is committed to working with its employees to maintain a work environment free from violence, threats of violence, harassment, intimidation, and other disruptive behavior. While this kind of conduct is not pervasive at our company, no company is immune.

Violence, threats, harassment, intimidation, and other disruptive behavior in our workplace will not be tolerated; that is, all reports of incidents will be taken seriously and will be dealt with appropriately. Such behavior can include oral or written

statements, gestures, or expressions that communicate direct or indirect threat of physical harm. Individuals who commit such acts may be removed from the premises and may be subject to disciplinary action up to and including termination, criminal penalties, or both.

We need employee cooperation to implement this policy effectively and maintain a safe working environment. Do not ignore violent, threatening, harassing, intimidating, or other disruptive behavior. If you observe or experience such behavior by anyone on company premises, whether he or she is an employee or not, report it immediately to a supervisor or manager. Supervisors and managers who receive such reports should seek advice from the Human Resource Department regarding investigating the incident and initiating appropriate action.

### **Conflicts of Interest**

Many employees work closely with the company's customers and suppliers. In their work, they develop extensive relationships with the key personnel of these customers and suppliers. Because of their position, the employee has extensive influence on these partners. This influence is to be used only to further the success of the company and in no way is to be used for the personal gain of the employee. Examples of prohibited uses of this influence are: leveraging your position at company to secure employment at one of our partners for an employee's relative or soliciting gifts over \$250.

### **Records Retention Policy**

The corporate records of Dot Foods, Inc. and its subsidiaries (hereafter the "Company") are important assets. Corporate records include essentially all records you produce or use as an employee, whether paper or electronic. A record may be as obvious as a memorandum, an e-mail, a contract, or something not as obvious, such as a computerized desk calendar, an appointment book or an expense record.

The law requires the Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject the Company to penalties and fines, or seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with any published records retention or disposal policies and schedules, provided that all employees should note the following general exception to any stated disposal schedule: If you believe, or the Company informs you, that Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then you must preserve those records until the Legal Department determines the records are no longer needed. That exception supersedes any previously or subsequently established disposal schedule for those records. If you believe that exception may apply, or have any question regarding the possible applicability of that exception, please contact the Legal Department.

From time to time the Company establishes retention or disposal policies and schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Company record schedules may require that certain records scheduled for disposal be reviewed by the Dot archivist in advance of their disposal. The archivist, in consultation with the legal department, may determine that the records are of permanent value and should be retained in the Dot archives. Several categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

### **Corporate Gift Policy**

Company employees are approached by vendors on a routine basis with gifts and entertainment. It is a normal way of doing business. Modest gifts and entertainment can be accepted if they are reasonable compliments to a business relationship. Employees should never exploit their position in the company to solicit vendors for personal gifts or favors in exchange for preferential treatment. Employees at all times also need to avoid the appearance of impropriety when receiving any gifts from vendors.

The company has concerns that these types of gifts can influence employees to make improper decisions as it relates to company resources. In order to provide some guidelines to employees so that this doesn't have a negative effect on the company and also provide other guidance it has been determined that we need to establish a corporate gift giving policy. Employees are allowed to accept gifts and entertainment from vendors as long as the value of the gift or entertainment is under \$150. Gifts or entertainment over \$150 but less than \$250 are required to be reported to employee's immediate manager. All gifts or entertainment over \$250 have to be approved by their immediate manager before being accepted.

As always, use common sense in making decisions. If you have any doubt on whether to accept a gift from a vendor, then consult with your manager.