



**GREATER  
OMAHA®**  
100 YEARS OF LEGENDARY BEEF  
**FROM NEBRASKA**

# CODE OF CONDUCT

Revised: July 2021

## LETTER FROM THE EXECUTIVES

We are adopting an updated Code of Conduct (sometimes referred to as the "Code") that, once implemented, will guide, and influence our business practices from now on. Our Code covers multiple areas, but it is straightforward. We must do what is always correct, no matter what, without compromising our ethics, mission, and values. We all must align with the policy and spirit of the law in every action and decision we take. We will not tolerate any illegal or unethical activities, no matter the circumstances.

Our people, ethics, and values are our foundation and what provides us with a competitive advantage. We can't jeopardize it with any unethical actions or wrongdoing. We all have shared responsibility in learning, practicing, influencing, and teaching the higher ethical behaviors in our community.

Rolling out this Code of Conduct is only the first step. All Team Members are urged to read and adopt all applicable policies to their roles. When in doubt, reach out to Human Resources with questions.

We all have a duty and responsibility to create a work environment set on the highest ethical standards. This is a crucial way for us to be successful and achieve our mission.

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## INTRODUCTION

Greater Omaha Packing (sometimes referred to as the "Company" or "GOP") is committed to conducting business ethically, with integrity and in compliance with applicable laws. We encourage all Team Members to use our Mission, Values, Policies, Procedures, and the Code of Conduct and Ethics as the prism through which to view the world around them, at work and at home.

## COMPANY VISION AND MISSION

Greater Omaha Packing will produce the finest beef products in a manner that is uncompromising in food safety.

We will respect our Team Members, customers, and suppliers by treating them fairly and honoring every commitment that we make.

We will provide a proper work environment for everyone at Greater Omaha Packing and have an unyielding focus on our Team Members and their family's health, safety, and betterment.

We will be good stewards of the animals, land, and environment entrusted to us.

## VALUES

Definition	
<b>Commitment</b>	To be the best in our industry. To achieve this, we place the customer and our people at the center of everything we do. We fully commit to consistently delivering on expectations, to be present, and available to go the extra mile to get the job done and give 100% in all that we do and approach everything with a "can do attitude."
<b>Integrity</b>	To always do what's right at all times, uncompromising in food safety, honoring supplier and customer commitments.

	To build working relationships based on trust, to be self-aware, accountable, responsible, and truthful of the consistency in all our actions.
<b>Teamwork</b>	To deliver the mission, we need to work collectively and collaboratively as one unified team. We know that our best work is not produced by individuals but by working collaboratively as a team and supporting each other every day.
<b>Inclusion</b>	To provide the proper work environment for everyone, recognizing that our different backgrounds and beliefs make us better as individuals and as a company and must be respected and allowed to contribute to our success. An environment where everyone feels welcomed, respected, supported, and valued as a Team Member.
<b>Continuous improvement</b>	To have a passion for improvement to remain competitive and relevant in the marketplace. The status quo is not enough. To be committed to the relentless pursuit of improving our products, processes, and service levels to enhance value for our customers and ensure growth for the Company.

## HOW TO USE THE CODE

Team Members are instructed to follow the Code at all times. More importantly, we encourage everyone to use the Code as a resource to navigate difficult situations and to consult managers or Human Resources for assistance in complying with the Code.

## BUILD TRUST AND CREDIBILITY

Our business's success depends on the trust and confidence we earn from our Team Members, customers, and suppliers. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching Company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask will build trust and credibility for GOP. Will it help create a working environment in which GOP can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

## RESPECT FOR THE INDIVIDUAL

We all deserve to work in an environment where we are treated with dignity and respect. GOP is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

GOP is an equal employment employer and is committed to providing a workplace free of discrimination of all types and from abusive, offensive, or harassing behavior. Any Team Member who feels harassed or discriminated against should report the incident to his or her manager or Human Resources.

All GOP Team Members are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Always treat others with dignity and respect.
- Address and report inappropriate behavior and discriminatory, harassing, threatening, abusive, offensive, or unwelcome comments.
- Foster teamwork and Team Member participation, encouraging the representation of different Team Member perspectives.
- Seek out insights from Team Members with different experiences, perspectives, and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Where practical, support flexible work arrangements for co-workers with different needs, abilities, and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.

- Be open-minded and listen when given constructive feedback regarding others' perceptions of your conduct.

GOP will not tolerate discrimination, harassment, or any behavior or language that is abusive, offensive, threatening, or unwelcome.

## CREATE A CULTURE OF OPEN AND HONEST COMMUNICATION

At GOP, everyone should feel comfortable speaking his or her mind, specialist when matters of ethics are involved. Managers have a responsibility to create an open and supportive environment where Team Members feel comfortable raising such questions. We all benefit when Team Members exercise their power to prevent mistakes or wrongdoing by asking the right questions at the correct times.

GOP will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Company will take appropriate action. We will not tolerate retaliation against Team Members who raise genuine ethics concerns in good faith.

For your information, GOP's anti-retaliation policies are as follows:

### REPORTING AND RETALIATION

As a Team Member, it is your responsibility to report any suspected violation of the law, applicable regulations, our Company policies, the provisions of this Code of Conduct, or our ethical standards. ... Retaliation or discipline against those who in good faith report a suspected violation of the Code of Conduct or wrongdoing is strictly prohibited. However, in cases where a reporting Team Member is involved in a violation, the Team Member may be disciplined when appropriate. (See, Workplace Guidelines, Policies, and Procedures including Disciplinary Action). When deciding whether or not an action is a violation or is unethical, you should ask:

- Does it violate our Code of conduct?
- Does it violate a law or regulation?
- Were others treated the way I would want to be treated?
- Would a Team Member be embarrassed if this action was reported to the public?
- Is it the right thing to do?

Additionally, the Company prohibits any form of retaliation against Team Members who raise issues of equal employment opportunity, participate

in an investigation conducted on the Company's behalf, or raise a good faith complaint concerning wages, job assignments, or what he/she considers to be unfair treatment. Retaliation in any form against a person who reports harassment or discrimination or participates in the investigation of a complaint is also strictly prohibited. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including separation from employment, will be taken.

In the first instance, Team Members are encouraged to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if a Team Member is not comfortable raising the issue with his or her manager or HR, GOP's VP of Human Resources, President, or Owner does operate with an open-door policy.

Concerns may also be raised anonymously through the Ethics Line at 1-844-944-3416 or online at <https://greateromaha.ethicspoint.com>

## SET TONE AT THE TOP

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by Team Members and for taking the appropriate steps to promptly address such issues. Managers should not consider Team Member's ethics concerns as threats or challenges to their authority but rather as another encouraged form of business communication. At GOP, we want the ethics dialogue to become a natural part of daily work.

## UPHOLD THE LAW

GOP's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must understand the Company policies, laws, rules, and regulations applicable to our specific roles. If we are unsure whether the law or GOP's policy permits a contemplated action, we should seek advice from the resource



expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

## COMPETITION

We are dedicated to ethical, fair, and vigorous competition. We will sell GOP products and services based on their merit, superior quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for GOP or the sales of its products or services, nor will we engage or assist in unlawful boycotts of customers.

## PROPRIETARY INFORMATION

We must respect the property rights of others. We will not acquire or seek to acquire by improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

## SELECTIVE DISCLOSURE

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals, or otherwise) any material nonpublic information with respect to GOP, its securities, business operations, plans, financial condition, results of operations, or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

## HEALTH AND SAFETY

GOP is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see the HR department.

## AVOID CONFLICTS OF INTEREST

### CONFLICTS OF INTEREST

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of GOP may conflict with our own personal or family interests. We owe a duty to GOP to advance its legitimate interests when the opportunity to do so arises. We must never use GOP property or information for personal gain or personally take for ourselves any opportunity discovered through our position with GOP.

**Here are some other ways in which conflicts of interest could arise:**

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while employed with GOP.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier, or contractor.
5. Having a personal interest, financial interest, or potential gain in any GOP transaction.
6. Placing company business with a firm owned or controlled by a GOP Team Member or his or her family.
7. Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all GOP Team Members.

Determining whether a conflict of interest exists is not always easy to do. Team Members with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, Team Members must seek review from their managers or the HR department.

## GIFTS, GRATUITIES AND BUSINESS COURTESIES

GOP is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by GOP was sought, received, or given in exchange for personal business

courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment, or other benefits from persons or companies with whom GOP does or may do business. We will neither give nor accept business courtesies that constitute, nor could reasonably be perceived as constituting bribes or unfair business inducements. Such unfair business inducements may violate law, regulation, or GOP or customers' policies or cause embarrassment or reflect negatively on GOP's reputation.

## ACCEPTING BUSINESS COURTESIES

Most business courtesies offered to us in our employment are offered because of our positions at GOP. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at GOP to obtain business courtesies, we must never ask for them. We may accept unsolicited business courtesies that promote successful working relationships and goodwill with the firms that GOP maintains or may establish a business relationship with.

Team Members who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business, or who participate in the negotiation of contracts must be particularly conscientious about avoiding actions that make the appearance of favoritism, or that may adversely affect the Company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when GOP is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain GOP business.

## MEALS, REFRESHMENTS, AND ENTERTAINMENT

We may accept occasional meals, refreshments, entertainment, and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring soon.

- The Team Member accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

## GIFTS

Team Members may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets, and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps, and t-shirts (or other novelty, advertising, or promotional items).

Generally, Team Members may not accept compensation, honoraria, or money of any amount from entities with whom GOP does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) with a market value greater than \$100 may not be accepted unless approval is obtained from management.

Team Members with questions about accepting business courtesies should talk to the HR department.

## OFFERING BUSINESS COURTESIES

Any Team Member who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon GOP. A Team Member may never use personal funds or resources to do something that cannot be done with GOP resources. Accounting for business courtesies must be done in accordance with approved GOP procedures.

Other than our government customers, we may provide nonmonetary gifts (i.e., GOP logo apparel or similar promotional items) to our customers for whom special rules apply. Further, management may approve other courtesies, including meals, refreshments, or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent, and is not lavish.

- The business courtesy is properly reflected on the books and records of GOP.

## CORPORATE RECORDKEEPING

We create, retain, and dispose of our GOP records as part of our normal course of business in compliance with all GOP policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate, and complete. Company data must be promptly and accurately entered in our books in accordance with GOP's and other applicable accounting principles.

We must not improperly influence, manipulate, or mislead any authorized audit, nor interfere with any auditor engaged to perform an independent internal audit of GOP books, records, processes, or internal controls.

## PROMOTE SUBSTANCE OVER FORM

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At GOP, we must have the courage to tackle the tough decisions and make difficult choices, secure in knowing that GOP is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although GOP's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and guide us in our daily conduct.

## ACCOUNTABILITY

Each of us is responsible for knowing and adhering to the values and standards outlined in this Code and raising questions if we are uncertain about Company policy. If we are concerned about whether the standards are being met or aware of the Code's violations, we must contact the HR department.

GOP takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

## BE LOYAL

### CONFIDENTIAL AND PROPRIETARY INFORMATION

Integral to GOP's business success is our protection of confidential Company information and nonpublic information entrusted to us by Team Members customers, and other business partners. All Team Members have a continuing responsibility to protect the Company's confidential and proprietary information, during and after their employment with the Company. Confidential and proprietary information includes pricing and financial data, customer names/addresses, or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

## USE OF COMPANY RESOURCES

Company resources, including time, material, equipment, and information, are provided for Company business use. Nonetheless, occasional limited personal use is permissible if it does not affect job performance or cause a disruption to the workplace.

Team Members and those who represent GOP are trusted to behave responsibly and use good judgment to conserve Company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use Company equipment such as computers, copiers, and fax machines to conduct an outside business or support any religious, political, or other outside daily activity, except for Company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work time or in work areas. (Working time does not include meal periods, breaks, or time before or after work. Work areas do not include the lunch/break room.)

To protect the interests of GOP, and our fellow Team Members, GOP reserves the right to monitor or review all data and information on a Team Member's Company-issued computer or electronic device, the use of the Internet, or GOP's intranet. As such, Team Members should have no expectation of privacy for any information created, reviewed, saved, or transmitted over any devices or systems used for business purposes. We will not tolerate using Company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or that violate Company policy or are otherwise offensive or inappropriate.

Questions about the proper use of Company resources should be directed to your manager.

## MEDIA INQUIRIES

GOP is a high-profile company in our community, and from time to time, Team Members may be approached by reporters and other media members. To ensure that we speak with one voice and provide accurate information about the Company, when contacted by a member of the news media, Team Members are asked to state that they are not authorized to comment for the Company and to refer all questions requiring a response from the Company to the VP of Human Resources or General Counsel. No one may issue a press release on behalf of the Company without first consulting with the VP of Human Resources or General Counsel.

## DO THE RIGHT THING

Several key questions can help identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

- Does what I am doing comply with the GOP guiding principles, Code of Conduct, and Company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my Company, and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Remember that nothing in this Code of Conduct is meant to abridge Team Members' legal rights in any way or restrict Team Members' rights to discuss their wages, benefits, hours, or other terms and conditions of employment. Team Members have the right to engage in or refrain from engaging in such activities to the extent protected by law.



## INFORMATION AND RESOURCES

### **President**

- Mike Drury
- 402-575-4668
- mdrury@greateromaha.com

### **General Counsel**

- Mark Theisen
- 402-575-4702
- mtheisen@greateromaha.com

### **VP of Human Resources**

- Mohsine Gdid
- 402-575-4725
- mgdid@greateromaha.com

**Ethics Line:** \_\_\_\_\_.

## CODE OF CONDUCT ACKNOWLEDGEMENT FORM

I acknowledge that I have received a copy of the Company's Code of Conduct ("Code"). I understand that the Code contains important information on my obligations as an employee. I agree to read the entire Code of Conduct and to abide by the policies and procedures it describes at all times during my employment. If I have any questions about the Code of Conduct or other personnel policy matters, I will consult with my supervisor or the Human Resources Department.

I understand that the Code of Conduct is not a contract of employment and should not be construed as a contractual agreement. I understand and agree that I am employed "at will." Either the Company or I may terminate my employment at any time, with or without cause or notice. I understand that although the Code and other personnel policies, procedures, and employee benefits may change from time to time in the Company's discretion, this at-will employment relationship can be changed only by a written agreement signed by the Company President.

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Employee's Signature

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Date

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Employee's Printed Name