

# SERVING EXCELLENCE

WINLAND FOODS  
CODE OF CONDUCT

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# A Message From Our CEO

## Dear Colleagues,

I'm proud of the incredible work we've accomplished at Winland Foods. We are committed to building a company and a culture that celebrates integrity and sticks to our high standards. After all, when it comes to feeding people, there's no room for cutting corners.



Before we can fill plates, we need to earn trust. That's why we're committed to making foods and beverages that are nutritious, satisfying, safe, sustainable and affordable. Every decision we make, no matter how small, has the power to win or lose consumer trust. This Code is here to unite us in our commitment to integrity and guide us to do the right things for our customers, our Company and each other.

We believe in being exceptional from the land to the table. Your first step in this journey is to do more than just read this Code. We ask you to live it every day. Apply it to all your actions, especially when things get tough. You'll find the Code to be an invaluable tool, not only as a guide to making good decisions, but also when you believe our Code, policies or laws have been broken. It will show you how to share your concerns.

It's an honor to lead Winland Foods. I'm proud of the work we do and grateful for every single employee who is a part of it. As individuals, we all have something unique and vital to contribute. Together, we feed the world.



**Eric Beringause**  
CEO

# Our Purpose, Mission, Vision and Values

## Our Purpose

Winland Foods, Inc. and its affiliates (“Winland Foods”) provide a high-quality food experience of exceptional value that exceeds consumer expectations. We recognize the importance of making a positive impact on the world around us and maintain a steadfast commitment to sustainability and environmental responsibility in all aspects of our network. We prioritize the safety and well-being of our employees and customers and strive to consistently exceed industry standards in quality across our value chain.



### Our Mission

At Winland Foods we strive to WIN: the minds of our customers, the hearts of our consumers, the respect of our suppliers and the loyalty of our employees.



### Our Vision

Through a shared commitment to excellence, we are dedicated to being the first choice for our employees, consumers, customers, and business partners, while being responsible stewards of the environment and our communities.



### Our Values

- Commitment to Excellence
- Quality
- Integrity
- Respect
- Collaboration



# Understanding Our Code

## Code Purpose and Overview

It's not hard to see why the work we do matters. Each day, we help nourish and sustain millions of lives while building a company we can all be proud of. But what matters more than the work we do is the way we do it – by doing what's right and what's best for our Company, our customers and the planet.

At Winland Foods, we strive to leave a positive mark on the world around us. We expect all employees and supervisors to act with integrity in every action and interaction, making decisions that reflect who we are and what we stand for as a company. Hopefully, the right thing to do will be clear most of the time. But, we understand that work can be complicated – so can the laws and rules that apply to us. Sometimes it can be hard to know what to do or where to go for help.

Our Code of Conduct (“Code”) is your most important resource in this effort. It is designed with you in mind – a vital resource that will help you:

- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you could encounter in your work.
- Avoid even the appearance of anything improper in connection with our Company's business activities.

## Complying With Laws and Regulations

Winland Foods is committed to compliance with all laws, rules and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, Winland Foods also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and seek help when you need it.

We operate in multiple countries, so it is important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners and co-workers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If any guidance in our Code conflicts with a local law or requirement, you should seek guidance from Legal Affairs.

## Who Must Follow This Code

All employees, including contingent and contract employees at all locations and levels, as well as our Board of Directors, are required to read, understand and follow our Code. Consultants, contractors, agents, suppliers and vendors (“business partners”) who serve as an extension of Winland Foods are also expected to follow our Code in addition to any applicable contractual provisions.

## Accountability and Discipline

Violating our Code, our policies or the law or encouraging others to do so can put other employees, consumers or our reputation at risk. Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with Winland Foods. Violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution. Failure of business partners to abide by our Code may lead to termination of their relationship with Winland Foods.



# Understanding Our Code

## Our Responsibilities

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what helps us succeed and grow.

### Employee Responsibilities

Each of us has a responsibility to:

- Act professionally, honestly and ethically when conducting business on behalf of our Company.
- Know the information in our Code and Company policies, paying particular attention to the topics that apply to our specific job responsibilities.
- Complete all required employee training on time and stay up-to-date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies or the law. If you see or suspect a violation, [report it](#).
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

### Additional Responsibilities of Supervisors

Winland Foods supervisors are expected to:

- Lead by example. Model high standards of ethical business conduct and help create a work environment that values mutual respect and open communication.
- Be a resource for others. Communicate often with employees and business partners about how the Code and other policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethical dilemmas and challenging situations with others.
- Delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.
- Respond quickly and effectively. When a concern is brought to your attention, treat it seriously and with respect for everyone involved.
- Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what is not), discuss the matter with your supervisor.

### Responsibility of Winland Foods Business Partners

We expect our business partners to work as partners in Winland Foods' commitments to conduct business with integrity and in an ethical manner.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies or the law.



# Understanding Our Code

## Making Good Decisions

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you are not alone. There are resources available to help you.

### FACING A DIFFICULT DECISION?

It may help to ask yourself:

Is it legal?



Is it consistent with our Code  
and our Values?



Would I feel comfortable if  
senior management and others  
in my Company knew about it?



Would I feel comfortable if my decision  
or my actions were made public?



If the answer to all of these questions is “**yes**,” the decision to move forward is probably OK, but if the answer to any question is “**no**” or “**I am not sure**,” stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.



### One More Thing ...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies or our resources to better address a particular issue, bring them forward. Promoting an ethical Winland Foods is a responsibility we all share.

# Understanding Our Code

## Asking Questions and Reporting Concerns

If you see or suspect a violation of our Code, our policies or the law, or if you have a question about what to do, talk to your supervisor.

If you are uncomfortable speaking with your supervisor, there are other resources available to help you:

- Your Plant Manager
- Your Human Resources Representative
- Any member of Legal Affairs
- Contact the Hotline

**1.844.718.9832** (United States)

**1.844.718.9809** (Canada) or online at

[winlandfoods.ethicspoint.com](https://winlandfoods.ethicspoint.com)

Winland Foods will make every reasonable attempt to ensure that your concerns are addressed appropriately.



## WHAT TO EXPECT WHEN YOU USE THE HOTLINE

The Hotline web portal and phone line are available 24 hours a day, seven days a week. Operated by an independent third-party provider of corporate compliance services, your concerns will be documented in detail and forwarded to Winland Foods for further investigation.

When you contact the Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Winland Foods will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.





# Understanding Our Code

## Our Commitment to Non-retaliation

We will not tolerate any retaliation against any employee who, in good faith, asks a question, reports conduct that may be inconsistent with our Code, our policies, or the law or assists in an investigation of suspected wrongdoing.

### WHAT DOES REPORTING “IN GOOD FAITH” MEAN?

It means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.

### What If?



**Q:** I suspect there may be some unethical behavior going on in my department involving my supervisor. I know I should report my suspicions, and I am thinking about using the Hotline, but I am concerned about retaliation.

**A:** You are required to report misconduct and, in your situation, using the Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.



# Ensuring the Best Workplace

## Diversity, Equity and Inclusion

Winland Foods helps bring together employees with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results. We are committed to ensuring that everyone in our workplace – employees, job applicants and business partners – feel welcome and valued and are given opportunities to grow, contribute and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income and advancement in all our offices and facilities.



### DO THE RIGHT THING

- Treat others respectfully and professionally.
- Promote diversity in hiring and other employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or Company policy.



### LEARN MORE

Diversity, Equity and Inclusion Policy

## What If?



**Q:** One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

**A:** You should notify your supervisor or your Human Resources representative. Sending these kinds of jokes violates our Values, our email usage policies, and our standards on diversity, harassment and discrimination.

By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment we have all worked to create.



# Ensuring the Best Workplace

## Respectful Workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying and abusive conduct. Winland Foods does not tolerate verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment.

If you see, suspect or feel you have been the victim of harassment including sexual harassment, report it immediately. You'll be helping to preserve a respectful and productive workplace.



### DO THE RIGHT THING

- Promote a positive attitude – support policies designed to build a safe, ethical and respectful workplace.
- Help each other – speak out when a co-worker's conduct makes others uncomfortable.
- Be professional – do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- [Speak up](#) – report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.



### WATCH OUT FOR

- Threatening remarks, obscene phone calls or stalking.
- Unwelcome physical conduct, sexual advances or gestures.
- Demeaning or derogatory jokes.
- Verbal abuse, threats or taunting.



### LEARN MORE

Equal Opportunity and Anti-Harassment Policy

## What If?



**Q:** While on a business trip, a co-worker of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Was that harassment?

**A:** It could be. We expect our employees to practice respect, not only during working hours but in all work-related situations, including business trips. Tell your co-worker you are uncomfortable with these actions and ask them to stop. If they continue, report the problem.

**Q:** I frequently hear a co-worker making derogatory comments to another co-worker. These comments make me feel uncomfortable, but I feel like it's none of my business, and the person they're directed at will speak up if they are offended. Should I ignore this?

**A:** No, you shouldn't. It's up to each of us to help maintain a work environment where people feel welcome, valued and included. Since you're aware of this situation, you have a responsibility to speak up about it. If you feel you can, speak to your co-worker and ask that this behavior stop. If you feel you can't or the comments continue, talk to your supervisor or another resource.

# Ensuring the Best Workplace

## Health and Safety

Ensuring safety is an integral part of everything we do. We are committed to providing a safe and healthy workplace for all of our employees, business partners and anyone else in and around our facilities. Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to speak up about an incident, or to participate in an investigation into an incident, can have serious repercussions for our Company, and for every employee on the job, every day.

We must perform our duties in a safe manner at all times, including wearing the appropriate personal protective equipment, operating machinery only according to instructions and taking appropriate action when a safety hazard arises.

Lastly, each of us must report to work free from the influence of drugs or alcohol. Remember: Any substance that could impair your judgment or physical performance can ultimately harm our co-workers and consumers.



### WATCH OUT FOR

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.



### LEARN MORE

Drug & Alcohol-Free Workplace Policy

## What If?



- Q:** I've noticed some practices at my facility that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.
- A:** Discuss your concerns with your supervisor, your Human Resources manager or your local EHS leader. There may be very good reasons for the practices, or you may be bringing to light an issue that needs to be addressed. In either case, raising a concern about safety does not make you a troublemaker. It makes you a responsible employee who is concerned about the safety of others.
- Q:** A subcontractor commits a violation of our standards. Are subcontractors expected to follow the same health, safety and security policies and procedures as employees?
- A:** Absolutely. Supervisors are responsible for ensuring that subcontractors and other business partners at work on Winland Foods premises understand and comply with all applicable laws and regulations, as well as with additional requirements our Company or facilities may have.





# Doing What's Right

## Product Quality and Safety

We are dedicated to earning and maintaining the trust of our customers by ensuring the quality and safety of our products.

Each of us, as well as our business partners, are expected to meet all product quality and safety specifications and our customers' expectations.



### DO THE RIGHT THING

- Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality or safety of our products.
- Do your part to ensure complete and accurate quality reporting.
- Routinely check equipment and processes to ensure they conform to specifications and expectations – work toward continuous improvement.
- If you believe there is an issue that might endanger a consumer, report the issue to your supervisor immediately.

## What If?



**Q:** I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further as the Company investigates. What should I do?

**A:** Winland Foods never sacrifices quality or safety to meet a Company deadline or target. You should report the matter immediately to your supervisor, your Food Safety & Quality Manager or your Plant Manager.

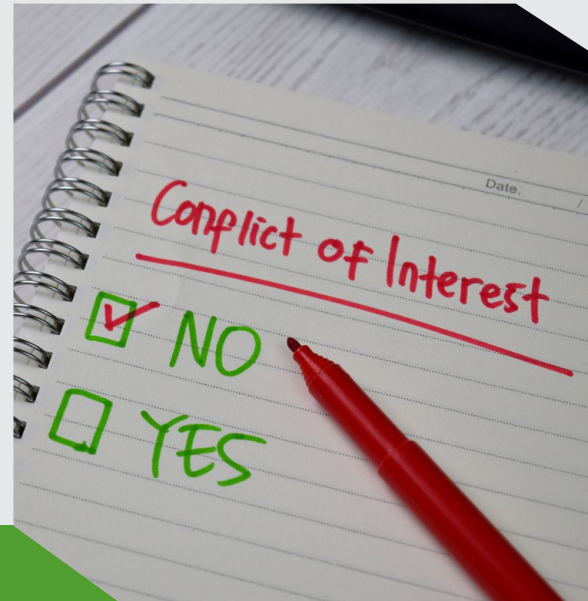


# Doing What's Right

## Conflicts of Interest

A conflict of interest can occur whenever an employee has an interest or activity that may interfere with their ability to make an objective decision on behalf of Winland Foods. Conflicts of interest may be actual, potential or even just a matter of perception.

Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation. Conflict of interest situations are not always clear-cut, so fully disclose them to your supervisor so they can be properly evaluated, monitored and managed.



## POTENTIAL CONFLICTS OF INTEREST

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

### Corporate opportunities

If you learn about a business opportunity because of your job, it belongs to Winland Foods first. This means that you should not take that opportunity for yourself unless you get approval from the General Counsel.

### Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your supervisor to determine if any precautions need to be taken.

### Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner or customer. Seek help with any questions.

### Outside employment

To ensure that there are no conflicts and that potential issues are addressed, always disclose and discuss outside employment or side businesses with your supervisor. If approved, make sure the outside activity does not interfere or compete with your work at Winland Foods. Working for a competitor, business partner or customer may raise conflicts that will need to be resolved.

### Civic activities

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners or customers, especially if your current job gives you the ability to influence our relationship with them.

# Doing What's Right

## Gifts, Entertainment and Hospitality

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.



### GOVERNMENT OFFICIALS

Be aware that the rules for what we may give to – or accept from – government officials are much stricter. Don't offer anything of value to a government official without obtaining approval, in advance, from the General Counsel. And remember: We do not accept or provide gifts, favors or entertainment to anyone – even if it complies with our policies – if the intent is to improperly influence a decision.

## What If?



**Q:** When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

**A:** You need to let your supervisor know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.



### DO THE RIGHT THING

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to – or accept them from – a business partner with whom you are involved in contract negotiations.
- Make sure anything given or received complies with the Company policies of both the giver and the recipient.
- Never give or accept cash or cash equivalents.
- Do not request or solicit personal gifts, favors, entertainment or services.
- Raise a concern whenever you suspect that a co-worker or business partner may be improperly attempting to influence a decision of a customer or government official.



### WATCH OUT FOR

- Situations that could embarrass you or our Company.
- Gifts, favors or entertainment that may be reasonable for a privately owned company but not for a government official or agency.



### LEARN MORE

Travel and Entertainment  
Expenses Policy

# Doing What's Right

## Anti-bribery and Corruption

Winland Foods is committed to complying with all applicable anti-corruption laws. We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs.

Do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or company representing our Company. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. Never ask them to do something that we are prohibited from doing ourselves.



### DO THE RIGHT THING

- Understand the standards set forth under anti-bribery laws which apply to your role at Winland Foods.
- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Exercise due diligence and carefully monitor third parties acting on our behalf particularly when dealing in countries with high corruption rates and in situations where “red flags” would indicate further screening is needed.
- Accurately and completely record all payments to third parties.



### WATCH OUT FOR

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with Winland Foods clearly documented in writing.

## KEY DEFINITIONS

**Bribery** means giving or receiving anything of value (or offering to do so) to obtain a business, financial or commercial advantage.

**Corruption** is the abuse of an entrusted power for private gain.

**Facilitation payments** are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.

**Government officials** include government employees, political parties, candidates for office, employees of public organizations and government-owned entities.

## What If?



**Q:** I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay this agent goes toward making payments or bribes to government officials. What should I do?

**A:** This should be reported to the General Counsel for investigation. If there is bribery and we fail to act, both you and Winland Foods could be liable. Investigating these kinds of situations can be culturally difficult in some countries, but anyone doing business with us should understand the necessity of these measures. It is important and appropriate to remind them of this policy.



# Doing What's Right

## Supplier Relations

Winland Foods evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. All agreements must be negotiated in good faith and be fair and reasonable for both parties.

Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law and in a way that's consistent with our Code, our policies and our Values.

## Fair Dealing

We treat our customers and business partners fairly. We work to understand and meet their needs and seek competitive advantages through superior performance, never through unethical or illegal practices. This commitment extends to what we say about our products and how we communicate in our marketing, advertising and sales materials.

Tell the truth about our services and capabilities and never make claims that aren't true. In short, treat our customers and business partners as you would like to be treated.



### DO THE RIGHT THING

- Be responsive to customer requests and questions. Only promise what you can deliver and deliver on what you promise.
- Be fair, factual and complete in our advertising and promotional language. Describe our products accurately, honestly and legally.
- Ensure labels are accurate and adhere to applicable federal and local-level labeling requirements.
- Never mislead or take unfair advantage of anyone by manipulating, concealing or misrepresenting material facts, abusing privileged information or any other unfair dealing practice.
- Never grant a customer's request to do something that you regard as unethical or unlawful.



### WATCH OUT FOR

- Pressure from co-workers or supervisor to cut corners on quality or safety standards.
- Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision-making.



# Doing What's Right

## Antitrust and Fair Competition

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices.

Do not engage in conversations with competitors about competitively sensitive information or engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers or markets. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.

### BE ALERT TO ANTI-COMPETITION WARNING SIGNS

In general, the following activities are red flags, should be avoided, and, if detected, reported:

- Sharing our Company's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.



### WATCH OUT FOR

- **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages or allocations of markets.
- **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting noncompetitive bids.
- **Tying** – when a company with market power forces customers to agree to services or products that they do not want or need.
- **Predatory pricing** – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

## What If?



**Q:** I received sensitive pricing information from one of our competitors. What should I do?

**A:** You should contact Legal Affairs without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.

# Doing What's Right

## Global Trade

Winland Foods has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, we must strictly comply with all applicable laws that govern the import and export of our products, and also with the laws of the countries where our products are manufactured. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

If your job duties include exporting products or receiving imported products, you are responsible for screening customers, suppliers and transactions to ensure that we comply with all applicable export and import requirements.



## ANTI-BOYCOTT REGULATIONS

We are subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction. We promptly report any request to join in, support or furnish information concerning a non-U.S.-sanctioned boycott.



## DO THE RIGHT THING

- Know the recipient and screen for denied parties before exporting.
- Obtain all necessary licenses before the import or export of products.
- Report complete, accurate and detailed information regarding every imported and exported product, including its place(s) of manufacture, its full cost and country of origin.
- Do not sign Free Trade Agreements, Powers of Attorney or General Agency Agreements without sign off from the Trade Compliance Group.
- Direct any questions you have regarding imports or exports of our products, ingredients or samples to the Trade Compliance Group by emailing [customs@winlandfoods.com](mailto:customs@winlandfoods.com).

## What If?



**Q:** My work requires the preparation of export goods for shipping. As part of my job, I am routinely asked to provide information about our exports. Do I really need to contact the Trade Compliance Group prior to each and every submission of information?

**A:** The right approach here would be to discuss with the Trade Compliance Group the types of requests your department routinely receives. These routine requests, once understood, might be handled without any additional review. Extraordinary requests would still require the Trade Compliance Group to review to ensure that you are responding accurately, fully and in accordance with the law.



# Protecting Information and Assets

## Company Assets

Winland Foods entrusts employees with assets (both tangible and intangible) that enable us to operate. Physical assets include Winland Foods facilities, materials and equipment. Electronic assets include computer and communication systems, software and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security and integrity.

Each of us is personally responsible for using these assets with care and protecting them from fraud, waste and abuse. Your personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment. Be aware that any information you create, share or download onto Company systems belongs to Winland Foods, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.



## WATCH OUT FOR

- Requests to borrow or use Winland Foods equipment without approval.
- Excessive use of Winland Foods resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.



## DO THE RIGHT THING

- Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities.
- Be a good steward of our electronic resources and systems, and practice good cybersecurity:
  - Do not share passwords or allow other people, including friends and family, to use Winland Foods assets.
  - Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Company computers or other equipment to conduct Company business is prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.
  - Lock your workstation when you step away and log off our systems when you complete your work for the day.
  - Beware of phishing attempts – use caution in opening email attachments from unknown senders or clicking on suspicious links.



## LEARN MORE

Acceptable Use & Electronic  
Monitoring Policy

Information Security Policy





# Protecting Information and Assets

## Data Privacy

We follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing and disposing of personal information.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number or credit card number. Only use personal information – and share it with others outside of Winland Foods – for legitimate business purposes and in accordance with our policies.



### WATCH OUT FOR

- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration or cloud services that could put personal information at risk.



### LEARN MORE

[Privacy Policy](#)



# Protecting Information and Assets

## Confidential Information

Winland Foods relies on employees to be vigilant and protect confidential information and intellectual property – some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Do your part to safeguard confidential information. Be aware that this obligation continues even after your employment at Winland Foods ends.

Winland Foods commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact Legal Affairs if you receive questions regarding:

- The scope of our intellectual property rights
- How Winland Foods' rights apply to another company's products
- How a third party's intellectual property rights apply to Winland Foods' intellectual property rights or products

## INTELLECTUAL PROPERTY

Examples of intellectual property (IP) include:

- Business and marketing plans
- Company initiatives (existing, planned, proposed or developing)
- Customer lists
- Recipes and formulas
- Trade secrets and discoveries
- Methods, know-how and techniques
- Innovations and designs
- Systems, software and technology
- Patents, trademarks and copyrights



## DO THE RIGHT THING

- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate Company information using Winland Foods information systems.

Our customers and business partners place their trust in us. We must protect their confidential information just as we protect our own.

Make sure you understand the expectations of customers and business partners regarding the protection, use and disclosure of the confidential information that they provide to us.

# Protecting Information and Assets

## Accurate Record Keeping

The accuracy and completeness of our business records and financial disclosures are essential to making informed decisions and supporting investors, regulators and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that any information you record is accurate, timely, complete and maintained in a manner that is consistent with our internal controls, disclosure controls and legal obligations.



### DO THE RIGHT THING

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Ensure precision of manufacturing, quality and safety records.
- Write carefully in all business communications including email, instant messages and text messages. Write as though someday the records you create may become public documents.
- Follow the Company retention policy when destroying documents.



### LEARN MORE

[Retention Policy](#)





# Protecting Information and Assets

## Responsible Communications

Winland Foods is committed to maintaining honest, professional and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public and must ensure that only authorized persons speak on behalf of Winland Foods.

Refer any communications with the media to the Chief Human Resources Officer.

### FULL, FAIR AND TIMELY DISCLOSURES

Winland Foods is committed to meeting its obligations of full, fair and timely disclosure in all reports and documents that describe our business and financial results and other public communications.



### WATCH OUT FOR

- Giving public speeches or writing articles for professional journals or other public communications that relate to Winland Foods without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for Winland Foods without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about Winland Foods or its customers or business partners.





# Protecting Information and Assets

## Insider Trading

We respect every company's right to protect its material, nonpublic ("inside") information, and we comply with insider trading laws.

In the course of business, you may learn confidential information about other companies that is not available to the public. Trading securities while aware of inside information or disclosing it to others who then trade ("tipping") is prohibited by various laws and our policies.



## MATERIAL INFORMATION

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- A proposed acquisition or sale of a business
- A significant expansion or cutback of operations
- A significant product development or important information about a product
- Extraordinary management or business developments
- Changes in strategic direction such as entering new markets



## DO THE RIGHT THING

- Do not buy or sell securities of any company when you have material nonpublic information about that company.
- Protect material nonpublic information from the general public including information in both electronic form and in paper copy.

# Building a Better World

## Sustainability

At Winland Foods, we are committed to sustainability by operating as a responsible corporate citizen, recognizing the interconnectedness between our business activities and the environment, society and economy. We approach sustainability as a Company-wide commitment to value creation and work to integrate sustainability into every decision we make. As a participant on the United Nations Global Compact, we work to align our strategies and operations to its principles-based approach and are committed to respecting human and labor rights, safeguarding the environment and working against corruption in all its forms.



### LEARN MORE

Sustainability at Winland Foods





# Building a Better World

## Corporate Social Responsibility

Corporate social responsibility is an integral part of Winland Foods' culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time and talent to support Company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support.

Winland Foods also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you're participating on your own time and at your own expense.



### WATCH OUT FOR

- Putting pressure on co-workers to participate in personal charitable or volunteer activities.
- Using Winland Foods funds, assets or the Winland Foods name to further your personal volunteer activities unless you receive approval in advance.



# Building a Better World

## Environmental Stewardship

We are committed to sustainable practices and environmental responsibility across our value chain. As a food manufacturing company, we recognize our impact on the environment and strive to minimize it through more sustainable practices.



### DO THE RIGHT THING

- Use resources such as water, energy and raw materials efficiently to reduce waste and conserve natural resources.
- Prioritize waste reduction through recycling, reusing and minimizing waste generation. All employees must adhere to waste management protocols, including proper disposal and segregation of waste materials.
- Source raw materials from sustainable and ethical suppliers. Employees involved in procurement should ensure suppliers adhere to our environmental standards and sustainability criteria.
- Take measures to prevent pollution by managing emissions, effluents and other pollutants. Employees must follow procedures to reduce pollution and report any incidents that could harm the environment.
- Continually seek to improve our environmental performance through innovation, technology and employee engagement. Employees are encouraged to contribute ideas and participate in initiatives aimed at enhancing our sustainability practices.
- Comply with all relevant environmental laws and regulations. Employees are provided with training and resources to understand their roles in maintaining compliance and promoting environmental stewardship.

By embracing these principles, we aim to create a healthier environment and a more sustainable future for our community and the world.





# Building a Better World

## Human Rights

We conduct our business in a manner that respects the human rights and dignity of all. We are committed to operate in compliance with the laws and regulations of each country in which we operate and in line with internationally recognized human rights standards including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work and related conventions.

### WHAT ARE HUMAN RIGHTS?

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status.

Each of us can help support efforts to eliminate human rights abuses, which include:

### Forced Labor

All forms of forced or compulsory labor, including prison labor, indentured labor including debt bondage, slave labor and human trafficking are prohibited.

- Recruitment must be conducted in a manner that respects and protects internationally recognized human rights.
- No individual shall be required to pay recruitment fees or related costs to secure employment.
- Agreement to terms and conditions of employment must be voluntary and free from deception or coercion.
- Workers' freedom of movement must not be restricted through conditions of employment, the retention of identity or immigration documents, holding of deposits or any other action aimed at restricting mobility.

## Child Labor

We prohibit the use of child labor and comply with applicable child labor laws, limiting employment to workers who meet the applicable minimum legal age requirement for their respective locations.

## Working Conditions

We are committed to creating a workplace where:

- Workplace health and safety is a top priority.
- Violence, threats, intimidation and any form of harassment or discrimination is prohibited.
- All laws, regulations and collective agreements regarding wages and working hours are complied to.
- The rights to freedom of association and collective bargaining are respected.



### DO THE RIGHT THING

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- Remember that respect for human dignity begins with our daily interactions with one another, our business partners and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

## What If?



**Q:** When I was visiting a new supplier, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?

**A:** You did the right thing first to be on the lookout for human rights abuses and second to raise the issue with our supplier. The next step is to report the incident to your supervisor, Legal Affairs or the Hotline. We are committed to human rights and to the elimination of human rights abuses including child labor.

# Building a Better World

## Political Involvement

Our Company does not support political parties or candidates for public office nor do we reimburse employees for political contributions.

Everyone has the right to voluntarily participate in the political process, including making personal political contributions. However, as employees, we must always make it clear that our personal views and actions are not those of Winland Foods.

Make it clear that your political views and activities are your own. You don't represent Winland Foods.

## What If?



**Q:** I would like to invite an elected official to speak at an upcoming Company event. Would that be a problem?

**A:** You must get approval from the General Counsel before inviting an elected official or other government official to attend a Company event. If the invitee is in the midst of a reelection campaign, the Company event could be viewed as an endorsement of the candidate. Depending on local laws, any food, drink or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.



## DO THE RIGHT THING

- Ensure that your personal political views and activities are not viewed as those of the Company.
- Do not use our resources or facilities to support your personal political activities.



## WATCH OUT FOR

- **Lobbying.** Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with Legal Affairs.
- **Pressure.** Never apply direct or indirect pressure on another employee to contribute to, support or oppose any political candidate or party.
- **Improper influence.** Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- **Conflicts of interest.** Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Winland Foods.

