



*IMPERIAL BAG  
& PAPER CO. LLC*  
(“IMPERIAL DADE”)

*CODE OF CONDUCT  
& BUSINESS ETHICS*  
(THE “CODE OF CONDUCT”)



# MESSAGE FROM JASON TILLIS

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Dear Imperial Dade Employees:

Imperial Dade is a rapidly growing company with strong roots, grounded in a commitment to conduct business with the utmost integrity and respect. We strive to manage every aspect of our business ethically and in compliance with the law. This Code of Conduct and Business Ethics (the “[Code of Conduct](#)”) sets forth the foundational principles that apply to all of us in our work. These principles are designed to foster relationships of trust and respect with our employees, customers, suppliers, government authorities, and communities at large.

The Code of Conduct also serves as a reminder to all employees to speak up if you see something that does not seem right. Every Imperial Dade team member is responsible for ensuring that our actions are consistent with the company’s mission and values. This is critical to protecting our reputation, our partners’ confidence in our business, and our financial strength.

Please read the Code of Conduct carefully and follow it completely. Compliance is our shared responsibility, and I thank you for all that you do every day to continue to live up to these high standards of professionalism and business ethics.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Tillis'.

Jason Tillis, Chief Executive Officer

# WHO WE ARE

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Imperial Dade is the leading independently owned and operated distributor of foodservice packaging, facilities maintenance supplies, floor equipment, and industrial packaging in North America. A provider of customized supply chain solutions, Imperial Dade serves customers in many business-to-business market segments. Our growing network of strategically located distribution centers serves tens of thousands of customers, with thousands of dedicated employees striving to exceed customer expectations.





# MISSION AND VALUES

At Imperial Dade, our customers' success has always been at the core of our strategies, decisions, and investments. Our mission is to bring quantifiable value to each customer's operations, providing the best possible solutions through products and services.

## **Ethics**

We conduct business in an ethical, legally compliant, and responsible manner with all stakeholders.

## **Communication**

We communicate with our employees in a clear, consistent manner ensuring that company goals, results, and policies are understood and that our employees have the information they need to succeed.

## **Respect**

We respect the rights and opinions of all stakeholders and treat each person as a valued partner.

## **Trust**

We build trust among all stakeholders and hold ourselves accountable to do the right thing.

## **Openness**

Our company culture encourages employees to share their ideas and suggestions. Our open-minded management team is given the flexibility to make changes to improve operations and anticipate the changing needs of our customers.

# IMPERIAL DADE IS A WORKPLACE OF BELONGING



We believe that when people feel they belong, they thrive. We know that different perspectives lead to better ideas. That is why building an inclusive culture is key to our continued success at Imperial Dade.

Respect is  
expected

Communication is  
honest

People are  
empowered

Uniqueness is  
valued

Success is  
a team sport



# TABLE OF CONTENTS

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Message from Jason Tillis .....	1	- Prohibition of Improper Payments
Who We Are .....	2	- Supplier Relations
Mission and Values .....	3	- Political Contributions
Table of Contents .....	5	• Contributions
Commitment to Integrity: An Overview .....	6	• Employee Political Activities
Compliance Is a Shared Responsibility .....	7	- International Business
- Reporting Obligations		- Antitrust Laws
- No Retaliation		- Exchange of Information with Competitors
- Violations		- Keeping Accurate Records
 		- Safeguarding Company Assets, Confidential and Proprietary Information, and Technology
Our Workplaces .....	8	
- Keeping Workplaces Safe, Secure, and Healthy		
- Fostering a Workplace of Belonging		
• Diversity and Equal Employment Opportunity		
• No Discrimination or Harassment		
• Hiring Practices		
• Consultants and Representatives		
Our Business .....	11	
- Dealing Fairly and Honestly		
- Compliance with Laws and Contractual Requirements		
- Certifications and Other Statements to the Government		
- Avoiding Conflicts of Interest		
		Our Communities .....
		18
		- Protecting the Environment
		• Product Sourcing
		• Minimizing Environmental Impacts of Our Facilities and Fleet
		• Supplier Expectations
		• Employee Expectations
		- Contributing to Our Communities and Causes
		Compliance and At-Will Employment Status .....
		20

# COMMITMENT TO INTEGRITY: AN OVERVIEW

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Imperial Dade is committed to integrity as the cornerstone of the way the company does business. We are bound to our employees, customers, suppliers, business partners, and communities to conduct our business in an ethical and legal manner. This requires that we:

- Make only true statements about our products, services, and capabilities
- Respect the rights of all employees to fair treatment and equal opportunity, free from discrimination or harassment of any type
- Know, understand, and comply with the laws, regulations, and policies governing the conduct of our business
- Ensure that all transactions are handled honestly and recorded accurately
- Protect information that belongs to the company, our employees, customers, suppliers, and other partners
- Avoid conflicts of interest, both real and perceived
- Never use company assets or information for personal gain
- Recognize that even the appearance of misconduct or impropriety can be very damaging to Imperial Dade's reputation and our ability to conduct business, and avoid all impropriety and appearance of impropriety



# COMPLIANCE IS A SHARED RESPONSIBILITY

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Compliance with the Code of Conduct is mandatory. This means not only taking personal responsibility for doing the right thing but also speaking up about others' conduct that might violate the Code of Conduct, company policies, or any law.

## Reporting Obligations

If you have a good faith belief that a potential violation of the Code of Conduct has occurred, you must report the incident promptly to your supervisor, Imperial Dade Legal (at [Legal@ImperialDade.com](mailto:Legal@ImperialDade.com)), or the Imperial Dade Confidential Employee and Supplier Hotline (the "Hotline"). The Hotline is managed by an independent third-party and provides online and phone-based methods for reporting concerns. Employees may contact the Hotline on a confidential basis, and confidentiality will be maintained to the extent possible. Neither Imperial Dade nor our third-party provider will reveal the name of an employee making a report to another employee who is the subject of a report, except as required by applicable law. Further, the Hotline enables anonymous reporting of concerns. We encourage you to provide your name because that allows us to ask follow-up questions to ensure the incident is fully investigated and understood; typically, this also enables us to address the incident most expeditiously. While it is helpful, therefore, it is not necessary to give your name when reporting an incident.

**If you see something, say something**

To make a report via the Hotline, you can call 800-461-9330 or visit [www.imperialdade.com/hotline](http://www.imperialdade.com/hotline). You can make a report 24 hours a day, seven days a week.

## No Retaliation

Imperial Dade prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a potential violation of the Code of Conduct or cooperating in related investigations, provided that the report is made in good faith and with a reasonable belief that the information submitted is true. Anyone who engages in any such retaliation will be subject to disciplinary action, up to and including termination of employment.

## Violations

Employees who fail to comply with the Code of Conduct, fail to report a potential violation of the Code of Conduct, deliberately withhold information concerning a potential violation of the Code of Conduct, fail to cooperate with an investigation of a potential violation, or who knowingly make a false report may be subject to disciplinary action, up to and including termination of employment and appropriate legal action.

## OUR WORKPLACES

Our employees are our greatest assets. Each day, we strive to keep our workplaces safe and secure, and to foster an inclusive culture where everyone feels a sense of belonging. Please see the Employee Handbook for more information, including for the company's Equal Employment Opportunity policy, our policy against Sexual and Other Unlawful Harassment, and for more information about working with management and Human Resources partners to answer questions and address concerns.

### **Keeping Workplaces Safe, Secure, and Healthy**

Imperial Dade's safety program is focused on keeping our workplaces safe, secure, and healthy for all our employees. The program emphasizes shared best practices, training, safety awareness, and eliminating hazards wherever possible. Imperial Dade's safety policies are designed to comply with all applicable laws and regulations, including OSHA and DOT standards.

Imperial Dade also desires to provide a drug-free, healthy, and safe workplace. To promote this goal, while on Imperial Dade premises and while conducting business-related activities off company premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol or illegal

drugs. Unauthorized weapons, or items which could be used, construed, or mistaken as a weapon are not permitted on company property, the worksite, delivery sites, or on the employee's person while performing duties for the company, unless required by law.

Employees are responsible for conducting their work activities in a safe and environmentally responsible manner and for bringing to management's attention any actual or potentially dangerous workplace conditions. Such concerns should be shared with the employees' supervisor or the Imperial Dade VP of Safety promptly.

### **Fostering a Workplace of Belonging**

Our success depends in great part on maintaining a respectful and inclusive workplace. Respecting diversity of culture, experience, and thought are critical to making Imperial Dade an innovative company with highly engaged employees committed to exceptional customer service. It is our policy and practice that all employees are provided fair and equitable treatment. It is also our policy and practice to employ individuals strictly on the basis of their qualifications for the applicable role, and to place employees in positions that are best suited for their capabilities.

## **Diversity and Equal Employment Opportunity**

Imperial Dade supports a positive environment in which all individuals may grow, contribute, and participate free from discrimination. We don't just accept differences—we celebrate and support them. Imperial Dade is an equal employment opportunity employer and does not discriminate against any person on the basis of actual or perceived race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap (including AIDS and HIV), sex or gender, gender identity or expression, pregnancy, marital status (including civil unions), familial status, domestic partnership, atypical hereditary cellular or blood trait, genetic information, liability for service in the United States Armed Forces, veteran status, sexual orientation, or any other characteristic protected by applicable federal, state, or local laws (referred to as "protected status"). Imperial Dade's nondiscrimination policy extends to all terms, conditions, and privileges of employment as well as the use of the company facilities, participation in all company-sponsored activities, and all employment actions such as recruitment, hiring, promotions, upgrading, demotions, downgrading, transfers, lay-off, compensation, benefits, and termination of employment.

## **No Discrimination or Harassment**

Imperial Dade is committed to providing a work environment that is free from all forms of unlawful harassment. Actions, words, jokes, comments, or other conduct that is harassing, coercive, or disruptive and based on an individual's actual or perceived race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap (including AIDS and HIV), sex or gender,

gender identity or expression, marital status (including civil unions), familial status, domestic partnership, atypical hereditary cellular or blood trait, genetic information, liability for service in the United States Armed Forces, veteran status, sexual orientation, or any other characteristic protected by applicable federal, state, or local laws will not be tolerated.

Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

## **Hiring Practices**

Imperial Dade has no prohibition against the hiring of relatives of employees. Decisions regarding hiring, however, may not be influenced by a family or other significant personal relationship. In addition, no employee shall be supervised or in a position in which progress can be influenced by a relative or other such relationship.

Recruitment and employment of current and former U.S. Government employees is governed by complex rules that are subject to change (sometimes called "revolving door" rules). These rules may prohibit recruitment and employment of U.S. Government employees or even discussions of possible employment. There may also be restrictions on the duties current and former government employees may perform as employees, agents, consultants, or other representatives of Imperial Dade.

Former government personnel are subject to federal conflict of interest laws and the rules and regulations of government agencies. Before engaging in any employment discussions with individuals who

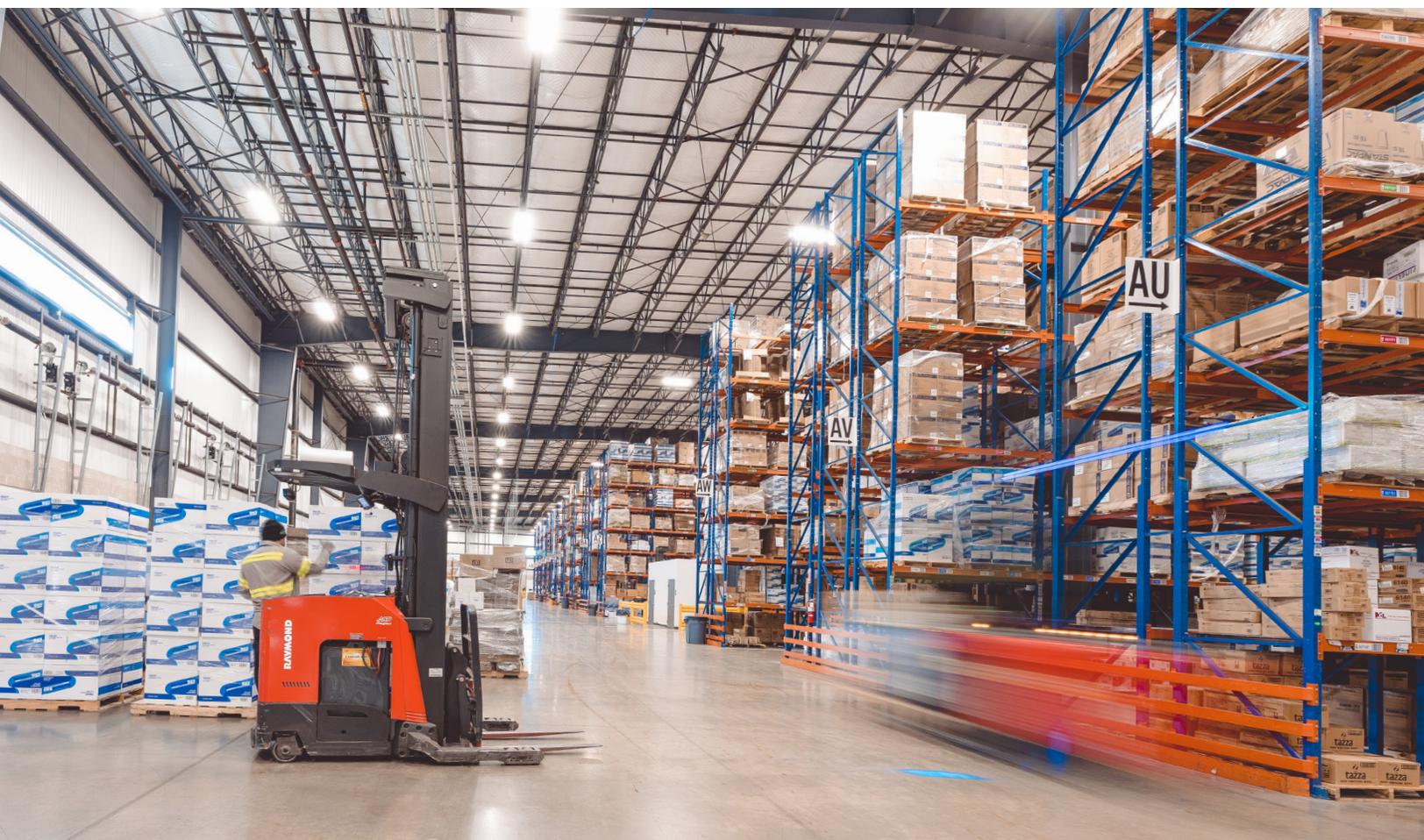
currently are, or formerly were, employed by the government, employees must understand these laws, rules, and regulations. Please contact Imperial Dade Legal for advice about proposed recruitment and employment of such personnel.

It is particularly important that potential conflict of interest situations be reviewed and resolved by Imperial Dade Legal prior to any discussions regarding potential employment of current government personnel - including exploratory contacts, recruitment, solicitation, and offer of employment.

### **Consultants and Representatives**

Consultants and representatives shall only be retained for proper commercial purposes and in accordance with Imperial Dade policies. Compensation for consultants and representatives will be comparable to that customarily paid in the locale and commensurate with the nature and scope of the service.

Imperial Dade officers, directors and employees may not act as consultants, agents, or representatives for other companies or entities when doing so might present a conflict of interest with such individual's role at Imperial Dade.





# OUR BUSINESS

## Dealing Fairly and Honestly

We compete and win on the basis of excellent service, reliability, and a reputation for integrity. We deal fairly and honestly with our customers, suppliers, and other business partners by:

- Making only true statements about our products, services, and capabilities
- Communicating honestly with our business partners to address challenges
- Never misrepresenting a competitor's products or services
- Advertising in a way that complies with laws and regulations
- Avoiding actual or perceived conflicts of interest
- Following all laws and special requirements related to government contracting and international business and trade
- Never offering or accepting anything that could appear to be a bribe, a kickback, or otherwise inappropriately influence a decision about our business

## Compliance with Laws and Contractual Requirements

All Imperial Dade employees must conduct business in accordance with applicable laws and in a manner designed to comply with all contractual obligations. Employees may not take any actions for the purpose of circumventing such obligations.

In the event Imperial Dade's obligations are not clear under a contract or subcontract or if you have questions about a law or a contractual obligation, you should contact your supervisor or Imperial Dade Legal.

## Certifications and Other Statements to the Government

Employees signing certifications or making other statements to a government entity on behalf of Imperial Dade are responsible for acting diligently and conducting a reasonable investigation, when necessary, to ensure the truthfulness and accuracy of such communications. Inaccuracy or misleading statements can result in criminal and civil penalties for the individual employee and the company. Such certifications and representations should also be reviewed and approved by Imperial Dade Legal pursuant to company policies.

## Avoiding Conflicts of Interest

Imperial Dade respects the right of its employees to manage their financial affairs, to make personal investments and to participate in private commercial enterprise. Employees should not, however, permit their outside interests to interfere with their job duties. A conflict of interest arises when an employee has an interest in any business or property or an obligation to any person that could affect the employee's judgment

in fulfilling his or her responsibilities to Imperial Dade. Accordingly, Imperial Dade employees are expected to refrain from any activity or investment that constitutes, or might appear to constitute, a conflict of interest. In addition to violating the Code of Conduct, a conflict of interest may also lead to criminal or civil liability for the individuals and entities involved.

For example, a conflict of interest may arise if an Imperial Dade employee has a substantial holding in, or a professional affiliation with, a supplier, customer, or competitor. A conflict of interest may also occur when an employee is in a position to influence a decision that may result in a personal gain for the employee or the employee's family member as a result of Imperial Dade's business dealings. A family or other personal relationship with an Imperial Dade supplier or competitor may also present a conflict of interest. Imperial Dade prohibits all employees from using their position with Imperial Dade or Imperial Dade's relationship with its customers, suppliers, or other business partners for private gain or to obtain benefits for themselves, their relatives, their friends, or their private enterprises.

You must disclose to Imperial Dade Legal any outside activity, relationship, or investment in which you are involved or may become involved that is, or has the potential for appearing to be, a conflict of interest. If you require guidance in this area, Imperial Dade Legal should be consulted promptly.

### **Prohibition of Improper Payments**

The offer, promise, or provision of anything of value to another person, directly or indirectly, with the intent to

secure an improper advantage or other benefit for our business is strictly prohibited by the Code of Conduct and applicable laws. All payments and agreements to provide money or anything else of value must be in strict accordance with this Code of Conduct and all applicable laws. Kickbacks, bribes, and other similar improper payments to induce or reward decisions or actions are strictly prohibited. This Code and applicable law also strictly prohibit any payment or exchange of value to an agent, sales representative, consultant, or other third party with knowledge or reason to believe any funds (or other items of value) provided will be used for an improper payment or otherwise in violation of this Code or applicable law.

No company employee may make or offer to make direct or indirect payments or exchanges of anything of value (e.g., compensation, gifts, employment opportunities, or contributions) to any persons or firms employed by or acting on behalf of a customer (private or governmental) for the purpose of rewarding favorable actions in a transaction. All employees and management should exercise sound judgment and discretion when seeking authorization for or approving business expenses. When there is any doubt about the permissibility of a payment or any exchange of value under this Code of Conduct or applicable law, you should consult with Imperial Dade Legal.

U.S. Government personnel are prohibited, with limited exceptions, from accepting gifts, gratuities, or entertainment from contractors. Similar rules apply to many state and municipal employees. Imperial Dade supports these rules and employees

are expected to comply with both the letter and spirit of these directives. The company and its employees must avoid any situations which could be viewed as attempts to evade the requirements imposed on military and civilian government employees. Generally speaking, government employees may accept modest refreshments (e.g., coffee and donuts) incidental to a business meeting. Imperial Dade employees are prohibited from offering government employees anything beyond such modest offerings without prior approval from Imperial Dade Legal.

For the sake of clarity, all employees are prohibited from making or offering to make direct or indirect payments or exchanges of anything of value (e.g., compensation, gifts, or contributions) to any governmental officials, political parties, or officials of a party or candidate for political office, for the purpose of rewarding favorable actions or influence of the official, party or candidate.

To ensure compliance with the Code of Conduct and legal requirements, ordinary and reasonable business meal, entertainment, gift, and travel expenses should be made only in accordance with Imperial Dade's compliance policies and procedures.

Any employee who is asked to authorize, make or agree to a payment that may be contrary to the Code of Conduct must immediately report the payment to their supervisor or Imperial Dade Legal. Similarly, if an employee learns that another employee is making or offering to make improper payments or exchanges of value, the employee must immediately report the conduct in accordance with this Code of Conduct. Imperial Dade will promptly and thoroughly investigate all concerns regarding such improper

payments and determine what action should be taken, up to and including termination of employment and appropriate legal action.

### **Supplier Relations**

Imperial Dade employees are also prohibited from accepting anything of value from a supplier or other business partner, except in accordance with Imperial Dade's compliance policies and procedures. These procedures generally permit acceptance of gifts of nominal value (e.g., swag bag from a conference; t-shirt bearing the supplier's logo) from a supplier or other business partner. Gifts of larger value must be reported to your supervisor for evaluation under this Code of Conduct and applicable laws. If there is any doubt about the value or the advisability of accepting a gift or anything of value, ask your supervisor or Imperial Dade Legal.

Invitations to social events, working luncheons or other business-related events are to be evaluated individually on their merit as a business activity. If there are sound business reasons for accepting, you may do so with the knowledge and consent of your supervisor.

In connection with federal contracts or subcontracts, federal law prohibits "kickbacks," under which money or anything of value is directly or indirectly provided or offered to or solicited by employees of a contractor or subcontractor for the purpose of improperly obtaining or rewarding favorable treatment. Accordingly, favors may not be solicited, and if you are offered any favors, you must decline them and report the incident to your supervisor.

All employees, particularly those involved in the procurement of supplies or services on behalf of

the company, must avoid even the appearance of impropriety.

### **Political Contributions**

Imperial Dade will not make any contributions to any political party or candidate for political office in violation of federal or state law.

### **Contributions**

Political contributions to federal election campaigns made directly or indirectly from Imperial Dade funds are prohibited. The legality of political contributions to state or local campaigns or causes must be determined on a state-by-state basis and, therefore, must be approved in advance by Imperial Dade Legal. Political contributions include any donation, gift, or loan of company funds, assets, or property, directly or indirectly, to or for the benefit of any political party, committee, or candidate, and any use of company funds, assets, or property, directly or indirectly, to candidate or officeholder. This includes: (a) donations, gifts, or loans of funds, assets, or property which are made by employees or third persons, such as agents, or consultants, who are reimbursed in any way by the company; (b) the uncompensated use of company services, facilities, or property; and (c) loans, loan guarantees, or other extensions of credit.

### **Employee Political Activities**

Employees who engage in political activities must do so on their own time as private citizens, not as Imperial Dade representatives. Employees who seek public office may use vacation time or request leaves of absence to campaign or hold office.

### **International Business**

Imperial Dade's policy is to comply with all applicable import and export control requirements, including, but not limited to, with respect to the United States, the Export Administration Regulations and the various laws, regulations, and rules administered and enforcement by U.S. Customs and Border Protection, as well as other similar foreign laws that may be applicable to a transaction. Imperial Dade also complies with all applicable sanctions, including, but not limited to, those sanctions administered by the Office of Foreign Assets Control and comparable requirements under the laws of other countries that may be applicable to a transaction. All employees, agents, representatives, and other parties acting on our behalf, are required to comply with all applicable import, export, and sanctions laws, regulations, and rules. All international business must be in strict compliance with the Code of Conduct, applicable laws, and Imperial Dade's compliance policies and procedures.

Any individual who violates import, export, or sanctions requirements may be subject to criminal or civil prosecution, up to and including imprisonment. In addition, any employee involved in such activities may be subject to disciplinary action, up to and including termination of employment.

### **Antitrust Laws**

Individuals who violate antitrust laws are subject to fines and imprisonment, and can also subject the company to liability and reputational harm. Imperial Dade takes compliance with antitrust laws seriously, and will hold employees responsible for abiding by these laws as well.

In compliance with Section I of the Sherman Antitrust Act:

- No employee may enter into an agreement (expressed or implied, formal or informal, written or oral) with any competitor restricting any of the following conditions or business offerings:
  - Prices
  - Cost
  - Profits
  - Offerings of products and services
  - Terms of sale conditions
  - Production or sales volume
  - Production capacity
  - Market share
  - Quote decisions
  - Customer selection
  - Sales territories
  - Distribution methodology
- No employee may enter into an agreement with a purchaser or lessee restricting the right of the purchaser or lessee to determine the price to resell or lease the product in question. Employees may also not enter into such agreements when Imperial Dade is the purchaser or lessee in the agreement.

The following situations may violate antitrust laws under certain circumstances. Employees may not enter into these agreements without consulting Imperial Dade Legal in advance and obtaining clearance to move forward:

- Agreements with customers or suppliers regarding the sales or purchases of reciprocal purchases or sales by customers or suppliers
- Agreements with purchasers or lessees of products

of Imperial Dade that would restrict customers from using or reselling products

- Agreements with any party that would restrict all parties involved to manufacture a product or provide a service to a third party

### **Exchange of Information with Competitors**

Certain communications with competitors may violate antitrust laws, especially when accompanied by actions. Imperial Dade employees are prohibited from discussing information on prices, costs, profits, offerings of products and services, terms of sale conditions, production or sales volume, production capacity, market share, quote decisions, customer selection, sales territories, or distribution methodology with a competitor or another third party acting on behalf of a competitor. If an employee has a question about whether a communication with a competitor would violate the Code of Conduct, the employee should consult Imperial Dade Legal before engaging in the communication.

When participating in trade associations and other meetings with competitors, employees must ensure that such meetings do not violate the prohibitions in the paragraph above and, in the case of trade associations, ensure that such meetings are subject to formal rules established by the trade association to avoid antitrust violations and other improprieties.

Employees must recognize that participating in development and product certification events impacting competitors or suppliers may implicate antitrust concerns. Accordingly, employees must consult with Imperial Dade Legal prior to attending any such event.

## Keeping Accurate Records

Imperial Dade maintains complete and accurate records to help run the business effectively and efficiently, and to provide truthful information about company operations when necessary. From time to time, Imperial Dade must disclose certain records, and it is important for the company to be able to make such disclosures in a timely manner. In addition, failure to keep accurate records may result in a violation of law.

Imperial Dade employees must help maintain the integrity of company records by doing the following:

- Reporting time worked accurately and promptly
- Submitting accurate reimbursement and expense reports, compliant with Imperial Dade's Travel & Entertainment Policy
- Following Imperial Dade retention requirements and other record-keeping procedures and guidelines
- Never using misstatement, exaggeration, or guesswork in our records
- Creating and maintaining books, invoices, expense reports, and receipts that honestly reflect financial transactions
- Recording all assets, liabilities, revenues, expenses, and business transactions completely, accurately, and in a timely manner
- Adhering to applicable generally accepted accounting standards (e.g., US GAAP), internal control standards (e.g., COSO), and all relevant laws and regulations when keeping records
- Responding promptly and accurately to requests for records from internal and external auditors and legal counsel
- Reporting any concern that a record is inaccurate, false, or misleading to your supervisor, the Chief Accounting Officer, or Imperial Dade Legal.

## Safeguarding Company Assets, Confidential and Proprietary Information, and Technology

All Imperial Dade employees are responsible for acting in good faith to keep Imperial Dade assets (including intellectual property) safe from theft, loss, fraud, waste, and abuse. We must also protect confidential and proprietary information entrusted to us by employees, customers, suppliers, business partners, and others. Imperial Dade's policies are designed to comply with privacy, data security, and other laws and industry practices when handling personal and other sensitive information.

All Imperial Dade employees must act responsibly in safeguarding Imperial Dade assets and when handling confidential and proprietary information of Imperial Dade, our employees, customers, suppliers, business partners, and others by:

- Adhering to Imperial Dade's published security and information compliance policies and documents (including those relating to physical security, cybersecurity, and data protection)
- Using information and technology responsibly
- Never allowing unauthorized persons to use company assets
- Locking laptops and all other devices when not in use, and keeping them secure at all times on and off company premises
- Protecting user IDs and passwords
- Making sure all confidential, personal, and proprietary information is kept safe, secure, and out of public view (e.g., sensitive hard copy files must be locked and secure; sensitive digital files must be password protected)
- Collecting, using and sharing personal information only as needed to meet legitimate business purposes and in compliance with applicable law

- Ensuring that information regarding employees or former employees is not given to outside organizations or individuals, and that all inquiries regarding current and former employees are handled by Imperial Dade Human Resources Department
- Reporting abuse or misuse of company assets promptly

An information security incident includes loss or theft of information or data in the control or custody of Imperial Dade; unauthorized use, disclosure, destruction, alteration or access to such data; or the unauthorized access to or use of, the inability to access, or malicious infection of an Imperial Dade information technology system (e.g., computer, network, storage device).

Any Imperial Dade employee who suspects the occurrence of an information security incident must report such concern to the employee's supervisor, Imperial Dade Legal, or the Chief Information Officer.



# OUR COMMUNITIES

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Imperial Dade values the communities in which we operate and strives to minimize our environmental impact while promoting products that help businesses reach their sustainability goals. We also encourage our employees to seek opportunities that allow us to contribute positively to society—as individuals and as a company.

## **Protecting the Environment**

At Imperial Dade, we recognize that our activities may affect the environment, and we do our best to minimize that impact to protect the communities in which we operate. Environmental consciousness has been at the core of how we operate for decades—it informs product sourcing, how we build and maintain our warehouses and fleet, the suppliers we partner with, and how we train our employees.

## **Product Sourcing**

Since 2005, Imperial Dade has operated our Greensafe™ Program, providing customers with a comprehensive supply chain management program including consulting, product sourcing, fulfillment, and procedural training designed to help businesses reach their sustainability goals. We strive to continuously increase the number of green products in our catalog and provide guidance to customers seeking to transition to greener products.

## **Minimizing Environmental Impacts of Our Facilities and Fleet**

Imperial Dade seeks renewable sources of energy and strives to reduce electrical, gas, and energy consumption whenever possible. We recycle in both our offices and warehouses, which includes corrugated boxes, shrink wrap, paper, plastics, pallets, furniture, and computer equipment. We are also continuously modernizing our fleet to improve fuel and route efficiency.

## **Supplier Expectations**

As set forth in Imperial Dade's Supplier Code of Conduct, we expect our suppliers to not only follow all applicable environmental laws, but also to continuously evaluate and improve their environmental practices in areas such as waste reduction, water use, and carbon emissions. Suppliers are expected to report incidents and concerns to Imperial Dade's Hotline.

## **Employee Expectations**

All Imperial Dade employees are required to follow applicable environmental laws and policies, and to speak up about potential violations or environmental hazards.

### **Contributing to Our Communities and Causes**

Imperial Dade strives to be a good citizen of the communities in which its facilities are located and to make positive contributions to society.

Among other things, Imperial Dade may encourage or support participation by others—such as suppliers—in community organizations and activities. However, no Imperial Dade employee shall use his or her position with the company to unduly influence or force such participation. Employees who hold public office or serve on commissions or advisory groups should be alert to conflict-of-interest situations and be prepared to abstain from participating in any deliberations or voting on any issues that directly involve Imperial Dade.

All requests for monetary donations (including requests from customers) that are made on behalf of Imperial Dade, or in an employee's official role as an Imperial Dade employee, must be submitted to and approved by Imperial Dade Legal and the VP, Marketing and Communications.



# COMPLIANCE AND AT-WILL EMPLOYMENT STATUS

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Failure to comply with the Code of Conduct subjects all Imperial Dade employees to disciplinary action, up to and including termination of employment. Nothing in this Code of Conduct alters your at-will employment status. As an at-will employee, your employment with Imperial Dade may be terminated by you or Imperial Dade, at any time, with or without cause, and with or without notice.

From time to time, Imperial Dade may add to or revise this Code of Conduct to reflect changes in our policies and to incorporate applicable legal requirements and industry standards. Please visit <https://imperialdade.com/about-us> for the most up-to-date version of the Code of Conduct. Material changes will be communicated to employees.

The Code of Conduct does not apply to communications by employees, not made on behalf of Imperial Dade, concerning a labor dispute or other concerted communications for the purpose of mutual aid or protection protected by the National Labor Relations Act.

Please direct any questions about the Code of Conduct to Imperial Dade Legal.

