



**WELLS ENTERPRISES, INC.**  
**Code of Conduct**

**Effective February, 2014**

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## **WELLS ENTERPRISES, INC.**

### ***Code of Conduct***

Colleagues:

Nearly four years ago, we introduced the Wells Fundamentals to all employees and have made a concerted effort to incorporate them into our day-to-day operations and how we do business with our customers and one another. However, the Fundamentals weren't new. Company values of Honesty, Respect, Integrity, Discretion, Humility and Accountability have always made Wells a great place to work. The Fundamentals simply captured much of what makes Wells special, and put into writing the expectation that we would all fully commit to these values and beliefs in our day-to-day activities.

The next logical step, then, was to update our Company Code of Conduct to reflect the Fundamentals and give each employee the opportunity to fully understand what acting on the Fundamentals means and what is expected of him or her. The Code of Conduct is intended to provide us with a framework, which will help us ensure that Wells remains a great place to work and a great partner with whom to do business. Our Fundamentals call for us all to be "ambassadors of the Blue Bunny brand." Living the Fundamentals and the Code of Conduct will allow us to do just that.

I would like each of you to become thoroughly familiar with the Code and embrace it as the Company ambassador you are. As always, thanks for all that you do – for our customers, our consumers and for one another.

Mike Wells



honesty

respect

INTEGRITY

discretion

humility

ACCOUNTABILITY



## CORE VALUES

Wells recognizes a set of six Core Values, including:

- Honesty
- Respect
- Integrity
- Discretion
- Humility
- Accountability

Together, these six Core Values serve as a framework not only for this Code of Conduct, but also for the manner in which we do business.

## HONESTY

At Wells, we believe that working together effectively means working together honestly. Honesty is critical to fostering trust in our interpersonal relationships in the workplace and maintaining our reputation of reliability with our customers and consumers in the marketplace.

### Open Doors

An open and direct connection between employees and their supervisors is the cornerstone of successful workplace communication. At Wells, we've instituted an open door policy to ensure that employees can freely communicate not only with direct supervisors, but with all members of management.

If an employee has a suggestion, concern, or complaint, management wants to hear about it and, if appropriate, take action. Every Wells employee has the right to approach any member of management, and should feel free to do so without fear of retaliation.<sup>1</sup> The open door policy is the most effective means of solving workplace problems and can thereby improve the quality of the workplace for everyone.

### Privacy of Employee Records

Wells maintains a personnel file on each employee. The personnel file includes the employee's job application, resumé, training records, performance appraisals, salary increases, disciplinary actions, and other employment records.

We understand that the confidentiality of these records is important to all employees at Wells, and consequently, access to personnel files is generally limited to supervisory and managerial personnel and HR who have a legitimate reason to review the file. Each employee's confidential medical information is maintained in a file that is separate from the general personnel file, and such information is only accessible to those who have a legitimate reason to access the information and have completed proper training on the confidentiality of employee information.

If an employee wishes to view his or her own personnel file, access may be granted by the designated HR Business Partner or Generalist upon the employee's written request.

### Protection of Wells Property

Company property includes, among other things, cash, inventory, computers and computer systems, machinery, real estate, equipment, goodwill, information, and intellectual property. All employees have a responsibility to protect Company property from loss, theft, damage or misuse. Employees should immediately notify their supervisor if they become aware of the theft, loss, misuse or misappropriation of any Company property.

<sup>1</sup> Employees are encouraged to first approach their immediate supervisor with any concerns before approaching management.

### Responsible Communication

Communications with the public should reinforce a sense of trust in Wells. Whether statements are channeled through consumers, customers, suppliers, trade groups, the mass or social media, or made in private conversation, honesty is always the best policy. All public statements on behalf of Wells should be sufficiently candid, clear and complete so that they neither mislead nor lend themselves to misinterpretation.

It is important to remember that at Wells, personnel will regularly read, encounter, hear or produce confidential information. Confidential information about the company should be kept in the strictest confidence and should only be disclosed if expressly authorized by senior management and the Legal Department.

Because of the nature of our business, critical business information about suppliers, vendors, and customers is often accessible to Wells personnel. The reputation of Wells Enterprises depends on our protecting the sensitivity of this information. Disclosure within the Company of sensitive information about a supplier, vendor, or customer should arise only from a critical business need. Disclosure outside of the Company is prohibited unless authorized by the Legal Department.

Finally, to ensure that Wells complies with its business, legal, and ethical obligations, any inquiries from governmental authorities, regulators, or the media should be promptly referred to either the Vice President of Corporate Marketing and Communications or the Legal Department.



#### EXAMPLE #1

In connection with a disciplinary action against Jeremy, Jane, his supervisor, requests a copy of Jeremy's personnel file to review similar previous problems. Jason from Human Resources provides Jane with copies of Jeremy's personnel file and medical file.

**Question:** Jason's conduct is:

- A ) Acceptable because Jane is Jeremy's supervisor, and she has a legitimate reason to view both files.
- B ) Unacceptable because Jane did not have a legitimate reason to access the medical file.
- C ) Unacceptable because Jane is neither authorized to view Jeremy's personnel file or medical file.

**Answer: B.** Although Jane had a legitimate business need to review Jeremy's personnel file in connection with the disciplinary action, she did not have a legitimate reason to access Jeremy's medical information.

#### EXAMPLE #2

Chris, a member of the company's Sales team, is contacted by an official from the State of Nebraska to provide information regarding sales prices of Wells product to a customer in that state. Chris contacts his supervisor, Carlos, who provides the pricing information to the state official.

**Question:** Which of the following is true?

- A ) Chris' conduct was inappropriate, as he should have referred the state official to the Vice President of Corporate Marketing and Communications or the Legal Department.
- B ) Carlos' behavior was inappropriate, as he should not have provided potentially confidential information about a customer without authorization from the Legal Department.
- C ) Carlos' behavior was inappropriate, as he should not have provided potentially confidential information about Wells without the consent of management and the Legal Department.
- D ) All of the above.

**Answer: D.** Although notifying his supervisor was a wise choice, Chris should have also referred the state official to the Vice President of Corporate Marketing and Communications or the Legal Department. Carlos should not have disclosed the information without first obtaining the consent of management and the Legal Department.

honesty

## RESPECT & HUMILITY

At Wells, we believe our people are our most important asset, and we are committed to fostering an environment of fairness and respect.

### Diversity

Wells operates in an increasingly global world. Diversity is reflected not only among our workforce, but also among our customers, suppliers, vendors, and consumers. We believe diversity enhances value in both our workplace and in our communities. Accordingly, Wells expects all employees will respect the differences between our employees, our business contacts, and our community members.

#### Non-Discrimination Policy and Affirmative Action

Wells prohibits discrimination based on race, color, national origin, creed, pregnancy, sexual orientation, gender identity, religion, age, sex, disability, genetic information, protected veterans status, or any other status protected by applicable federal, state or local law. All employment activities and decisions shall be administered accordingly.

Wells has also developed an Affirmative Action Plan for minorities, women, protected veterans and individuals with disabilities. Wells requires all managers and supervisors to make employment decisions in accordance with the principles of equal employment opportunity and affirmative action.

Employees may contact their HR Business Partner or Generalist for more information on Wells' Non-Discrimination Policy and Affirmative Action Plan.

### Harassment Policy

The prevention and prohibition of unlawful harassment is integral to the creation and maintenance of a culture of respect. **Objectionable conduct or harassment, based on an applicant's or employee's race, color, national origin, creed, pregnancy, sexual orientation, gender identity, religion, age, sex, disability, genetic information, protected veterans status, or any other legally-protected characteristic will not be tolerated at Wells.** Sexual harassment includes, but is not limited to, requests for sexual favors, physical and verbal conduct, and advances of a sexual nature.

Wells prohibits any such behavior that has the purpose or effect of creating a hostile work environment, whether by physical action, written remarks, spoken words, or the production or distribution of images or videos. Retaliation against a Wells employee in response to a good faith complaint or action is also prohibited.

Wells expects its visitors, suppliers, vendors, and customers to abide by this Harassment Policy as well. If employees witness any harassment, or believe they have been harassed, they have a duty to notify management. Employees should report such conduct either to their HR Business Partner, through Wells' open door policy, or anonymously via the Ethics Hotline.

Employees may review the Wells Enterprises, Inc. Employee Handbook for more information on Wells' Harassment Policy.

respect

humility



### Drugs and Alcohol Policies

An employee under the influence of alcohol or legal drugs on the job may pose serious safety and health risks not only to his or her self, but also to coworkers. Accordingly, impairment, as defined in the Handbook, related to the use of alcohol or legal drugs on Wells' premises, while on Wells business, or while operating Wells-supplied vehicles or equipment is prohibited. Possession of alcohol on Wells' premises is also strictly prohibited. Similarly, the illegal possession, use, sale, distribution, or manufacture of drugs is prohibited, whether or not on Wells time or property.

Employees should refer to the Wells Enterprises, Inc. Employee Handbook for more information on the Drugs and Alcohol policies.

#### EXAMPLE #3

Maria, an engineer, is in the process of selecting a contractor to build a new receiving bay at the Reclaim Center. Maria casually tells her coworker, Mike, that she rejected a contractor because the project manager was a woman, and "women tire more easily from physical labor."

**Question:** Maria's behavior was:

- A ) Unacceptable, as she discriminated against a contractor because of the project manager's gender.
- B ) Acceptable because Wells' Non-Discrimination Policy only applies to the treatment of other Wells employees and not to the selection of external contractors.
- C ) Acceptable because Maria herself is a woman, and women cannot discriminate against other women based on gender.

**Answer: A.** Maria violated Wells' Non-Discrimination Policy by eliminating a contractor from consideration because of the project manager's gender.



## INTEGRITY & DISCRETION

"I have never had a policy. I've just tried to do my best each and every day." – Abraham Lincoln

### Commitment to our Consumers

At Wells, we believe the consumer is our boss. We are committed to providing the best products in the industry and marketing honestly and responsibly.

### Commitment to our Customers

It's not just what we do, but how we do it that differentiates us from other companies. With products of top quality and consistently dependable customer service, we serve our customers in such a distinctive way that we are certain we will become their preferred supplier in our category.

### Commitment to our Community

We believe in being a good corporate citizen in those communities in which we live and work by contributing our time, talent, and resources.

### Compliance with Laws, Rules, and Regulations

It is the strict policy of Wells to comply with all federal, state, and local laws, rules and regulations. If an employee becomes aware or reasonably suspects any violation of laws, rules, or regulations, it is his or her duty to report the potential violation to his or her supervisor either through the open door policy or via the Ethics Hotline. If any part of this Code of Conduct violates local law, the local laws shall prevail.

### Compliance with Antitrust and Unfair Competition Laws

Wells is committed to competing fairly. U.S. anti-trust and unfair competition laws prohibit certain unfair business practices, including attempts to monopolize markets and control prices, as well as conspiracies among competitors. It is the responsibility of each Wells employee to know his or her responsibilities under these laws and report any suspected violations. The following rules are intended to serve as a basic guide to compliance:

1. DO NOT TALK TO COMPETITORS ABOUT BIDS, PRICES, CUSTOMERS, OR TERRITORIES.
2. DO NOT GIVE OUR BID RECORDS OR PRICE LISTS TO A COMPETITOR, AND NEVER ACCEPT A BID RECORD OR PRICE LIST FROM A COMPETITOR.
3. NEVER ENTER INTO AN AGREEMENT WITH A COMPETITOR WITHOUT PRIOR APPROVAL FROM THE LEGAL DEPARTMENT.
4. DO NOT CHARGE SIMILAR CUSTOMERS DIFFERENT PRICES IN THE SAME MARKET WITHOUT FIRST CONSULTING THE LEGAL DEPARTMENT.
5. NEVER CHARGE A PRICE BELOW A FULLY-ALLOCATED COST WITHOUT FIRST CONSULTING THE LEGAL DEPARTMENT.
6. DO NOT DISCUSS THE PRICE AT WHICH A PURCHASER WILL RESELL WELLS PRODUCT.
7. DO NOT CONDITION THE SALE OR PURCHASE OF WELLS PRODUCTS ON THE PURCHASE OR SALE OF WELLS PRODUCT, OR PLACE ANY OTHER RESTRICTIONS ON THE PURCHASER'S ABILITY TO RESELL THOSE PRODUCT WITHOUT FIRST CONSULTING THE LEGAL DEPARTMENT.
8. NEVER ENTER INTO AN EXCLUSIVE DEALING ARRANGEMENT WITHOUT FIRST CONSULTING THE LEGAL DEPARTMENT.
9. NEVER DISCUSS WITH COMPETITORS OR CUSTOMERS THE BOYCOTTING OF A THIRD PARTY.

**\*This list is not intended to be complete.** For more information, please refer to Wells' Antitrust Compliance Program, available on Wells' intranet, from Human Resources, or from the Legal Department.



#### EXAMPLE #4

Robin, Marketing Associate, is contacted by Richmond Ice Cream, a competitor of Wells. Richmond Ice Cream is interested in having Wells produce a new novelty product under the Richmond Ice Cream name. Robin contacts the Legal Department to seek approval of the relationship with Richmond. Legal approves the relationship, and Wells and Richmond enter into an agreement.

**Question:** Robin's actions were:

- A ) Unacceptable because she entered into an agreement with a competitor.
- B ) Unacceptable because she did not refer Richmond Ice Cream to the Vice President of Corporate Marketing and Communications or the Legal Department.
- C ) Acceptable because Robin sought and received the approval of the Legal Department before entering into an agreement with Richmond Ice Cream.

**Answer: C.** Although it is normally not advisable to enter into an agreement with a competitor, there are some exceptions. In this case, Robin followed appropriate procedure by receiving the approval of the Legal Department before moving forward with the relationship with Richmond.

#### EXAMPLE #5

Dave, a Director in Sales, is frustrated by the entry of a small competitor into the convenience store markets in West Virginia. Traditionally, Wells and Dan's Dairy have been the only players in that territory. Dave contacts Dan's Dairy and suggests pressuring customers to exclude the small competitor from their convenience stores in West Virginia.

**Question:** Dave's behavior is:

- A ) Unacceptable because he discussed unfairly competing with the small competitor by colluding with Dan's Dairy to keep the competitor out of the West Virginia territory.
- B ) Acceptable because Dave has not yet contacted the customers about boycotting the small competitor.
- C ) Unacceptable because he discussed customers and territories with a competitor.
- D ) Both A and C are true.

**Answer: D.** Both discussing customers and territories with competitors and promoting unfair competition and boycotting are violations of Wells' Antitrust Compliance Program and this Code of Conduct.

INTEGRITY

discretion

## Conflicts of Interest

Outside interests should not weaken our commitment to Wells by either dividing our loyalties or diverting the energies we owe to Wells. It is crucial we make every effort to avoid situations that could compromise independent judgment. If a problem arises, employees should handle it forthrightly and honestly. An employee's first step should be reporting a possible conflict of interest to his or her immediate supervisor. Below are several guidelines to assist you in avoiding potential conflicts of interest.

1. Do not take business opportunities that belong to Wells. Investment and sales opportunities that arise in connection with or because of your relationship with Wells should be presented to the Company. Employees are also prohibited from using non-public information about the Company for personal advantage or for the advantage of third parties.
2. Participation in political activities should be solely in your role as a private citizen and not on behalf of Wells. Political activities include, but are not limited to: (i) contributions to any political party, politician, or candidate for public office or to any political action committee, and (ii) campaigning on behalf of any candidate, party, or political initiative. Additionally, campaigning of a political nature on Wells' premises or during working hours is strictly forbidden.<sup>2</sup>
3. Gifts, favors, entertainment, and job offers may be perceived as attempts to "purchase" or "influence" favorable treatment. Accepting such inducements could raise doubts about the ability of the recipient to make independent, objective business judgments and Wells' commitment to acting fairly. Certain inducements may be defined as bribes, payoffs, or kickbacks and may subject both the Company and the individual to civil and criminal penalties. Employees may accept gifts or entertainment if (i) they are under \$150 in value, (ii) they could not be construed as potentially influencing the individual's business judgment, (iii) public knowledge would not embarrass or disparage the personnel or Wells, and (iv) they are not cash gifts. Gift cards of less than \$150.00 in value are acceptable. Remember that the acceptance of multiple gifts within these parameters from a single supplier, vendor, or other party can also create an appearance of impropriety. Employees should decline gifts and entertainment of substantial value from people or firms doing or seeking business with the Company. When in doubt, politely decline the offer.<sup>3</sup>
4. Federal, state and local government agencies and departments each have strict rules, as do some customers and vendors, regarding the acceptance of entertainment, meals, transportation, gifts and other things of value from companies and people they regulate or with whom they do business. Some parties prohibit the acceptance of anything of value. To avoid confusion, **Wells employees may not give or offer to give to government employees any item, service, entertainment, meal, gift or transportation, regardless of value.** Similarly, employees may not make loans, guarantee loans, or make payments to or on behalf of any local, federal or state government employee.<sup>4</sup>
5. Providing meals, refreshments and modest entertainment while discussing business with non-government personnel is a commonly accepted business practice. These practices are permitted by Wells, provided they are reasonable in cost. However, these activities should be avoided if they might create even the appearance of impropriety or cause embarrassment to the Company, including purchasing or receiving packaged alcohol. Wells employees are also responsible for confirming that furnishing meals, refreshments, or entertainment does not violate the code of conduct of the recipient's company or organization.
6. All expenditures for business meals, refreshments or entertainment must be: (i) reasonable in nature, (ii) reasonable in amount, (iii) made in the proper course of business, (iv) fully and properly documented, and (v) otherwise in compliance with the Company's Travel and Expense Policy.
7. We understand that some employees may pursue secondary employment while working for Wells. Outside employment is permitted, provided that it does not present a conflict of interest with an employee's position at Wells. All employees will be evaluated according to the same performance criteria, and will be subject to Wells' scheduling requirements, regardless of their outside employment situation. Personnel considering outside employment are encouraged to discuss the matter with their supervisor.
8. There is potential for a conflict when employees have a personal connection with a Wells business partner. Outside of the workplace, employees should never accept benefits (whether personal gifts, entertainment, contract terms, or other benefits) beyond those available to the general public if such benefits are given because the individual is a Wells employee.
9. Members of the Board of Directors of Wells must disclose any direct or indirect interest that they may have with respect to any transactions made with the Company, including transactions between the Company and immediate family members of a Director. Such transactions are only permissible if (i) approved by a majority vote of the shareholders of the Company, (ii) approved by the full Board or a Board Committee, with the potentially conflicted Director abstaining, or (iii) the transaction is otherwise fair.

Employees can learn more about Wells' Conflicts of Interest Policy by reviewing their Wells Enterprises, Inc. Employee Handbooks or by consulting the Legal Department. Employees who encounter or suspect a potential conflict of interest should consult their supervisor or the Legal Department.

<sup>2</sup> Prohibitions on political activities shall not apply if such activities are protected by local laws.

<sup>3</sup> Gifts, favors, and entertainment from personal friends or family that are provided outside an individual's role as a Wells employee and not on behalf of the Company are permissible.

<sup>4</sup> Gifts, favors, and entertainment to personal friends and family that are given or provided outside an individual's role as a Wells employee and not on behalf of the Company are permissible.

#### EXAMPLE #6

In December, Paula, a Procurement Category Specialist, visits the corporate center of Portland Plastics, a potential new supplier. Paula's contact tells her that the holidays are approaching, and Portland would like to offer her a cash gift of \$250.00 to say thanks. Paula accepts the gift.

**Question:** Paula's behavior was:

- A ) Unacceptable because the gift was in cash.
- B ) Unacceptable because the gift could be perceived as a bribe.
- C ) Unacceptable because the gift was not in line with standard business practices.
- D ) All of the above.

**Answer: D.** Under this Code of Conduct, cash gifts are never acceptable. Additionally, a gift of that value is not in line with standard business practices and could be perceived as a bribe.

#### EXAMPLE #7

Alfalfa Oil Company is considering building a refinery in town. Amanda, a member of the Company's maintenance crew, is incensed about the prospect. She spends time in the city park after work collecting signatures for a petition opposing the refinery. Amanda wishes to submit the petition to the City Council.

**Question:** Amanda's behavior is:

- A ) Unacceptable because she is campaigning for a political initiative.
- B ) Unacceptable because she did not ask for permission to campaign from her supervisor.
- C ) Acceptable.
- D ) Unacceptable because she is campaigning near Wells' premises.

**Answer: C.** Amanda's behavior is acceptable because she is campaigning after work, off of Wells' premises, and in her capacity as an individual, not as a representative of Wells.

#### EXAMPLE #8

Irene, a member of the Purchasing group, recently accepted an evening position with Iowa Dairy, one of Wells' milk suppliers. She did not consult her supervisor prior to commencing her employment at Iowa Dairy. Since beginning her job at Iowa Dairy, the quality of Irene's performance at Wells has not changed.

**Question:** Irene's behavior is:

- A ) Unacceptable because she did not consult her supervisor prior to her employment at Iowa Dairy.
- B ) Acceptable because her employment at Iowa Dairy has not impacted her job performance at Wells.
- C ) Unacceptable because simultaneously working for Wells and a Wells supplier could present a conflict of interest.

**Answer: C.** Simultaneously working for Wells and a Wells supplier could present a conflict of interest.

\*Though Wells highly recommends consulting with a supervisor before pursuing secondary employment, consultation is not required.

## ACCOUNTABILITY

Accountability is essential at all levels of any successful organization. It is a prerequisite for efficiency and productivity in every part of our business.

### Workplace Safety

To assist in providing a safe and healthful work environment for employees, contractors, customers, and visitors, Wells has established a workplace safety program. This program is a top priority for Wells. The Corporate Safety, Health & Wellness Department has responsibility for research, administration, monitoring, and evaluation of the safety and health program. The program's success depends on every employee's personal commitment to each component within the Safety & Health Plan and his or her daily pledge to working safely.

A labor-management safety committee, composed of representatives from across the organization, has been established to help monitor Wells' safety program and to facilitate effective communication between employees and management about workplace safety and health issues.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Every employee, contractor, and visitor is required to comply with all safety and health rules and to exercise caution during every work activity. Employees must immediately report all unsafe conditions and unsafe acts to the appropriate supervisor, safety representative, or to Corporate Safety.

Employees should consult the Wells Enterprises, Inc. Employee Handbook for more information on Workplace Safety.

### Environmental Stewardship

Wells is committed to providing its consumers the highest quality product in a balanced sustainable manner. We are continually striving for a more sustainable value chain and have defined two key areas to target: carbon footprint intensity and reducing waste sent to landfills. Our carbon footprint intensity is the amount of carbon dioxide emitted per pound of product manufactured. By re-evaluating our use and distribution of energy expended through our daily operations in transportation, waste management, and production, and improving efficiencies in all facets of our Company, we plan to achieve our goals.

### Record Retention

Wells is fully committed to reducing storage and maintenance costs and increasing efficiency while remaining compliant with all legal requirements. Our Record Retention Policy is a comprehensive document, which governs the retention and destruction of all Company records, letters, reports and other documents, whether paper or electronic.

A full copy of Wells' Record Retention Policy is available on Wells' intranet or from Human Resources.

### Continuous Improvement

At Wells, we have an ongoing commitment to Continuous Improvement. Continuous Improvement is a collaborative process across multiple organizations that allows us to maintain our competitive advantage through improvements in safety, quality, delivery, and cost. We are focused on the relentless elimination of waste in all of our processes and supporting strategies that ultimately improve our top and bottom line through ideas generated and implemented by our employees.

ACCOUNTABILITY

# COMPLIANCE

## Communication

This Code of Conduct is available on the Wells Enterprises, Inc. corporate website, on Wells' intranet, or in hardcopy at all Wells facilities. Employees may obtain hardcopies of this Code of Conduct by contacting their supervisor or HR Generalist.

## Reporting Violations

If you suspect a violation of any of the provisions of this Code of Conduct, please immediately report it through the open door policy to your supervisor, a member of management, your HR representative, or anonymously via the Ethics Hotline. There will be no retaliation, disciplinary action or penalty for a good faith report of a violation.

## Investigations

Investigations of a violation of this Code of Conduct will be conducted by the Wells Ethics Hotline Administrative Team consisting of the Director of Internal Audit, the Internal Audit Manager, the Human Resources Compliance Manager, and the Associate General Counsel. This team is overseen by the Ethics Hotline Oversight Committee, comprised of the Chief Financial Officer, the Senior Vice President of Human Resources, and the Senior Vice President of Legal Affairs and General Counsel. Depending on the sensitivity of the matter, an investigation may be referred to an external party or to the Wells' Board of Directors.

## Penalties

Failure to comply with the terms of this Code of Conduct could result in penalties up to and including termination. Unless referred to the Board of Directors, appropriate penalties for confirmed violations are in the sole discretion of the Wells Hotline Administrative Team.

## Ethics Hotline

An Ethics Hotline is available for employees to report behavior that may be unsafe, illegal, unethical, or otherwise inconsistent with this Code of Conduct. If you see or suspect unethical, illegal, or unsafe activity, do not ignore it. Report it immediately. The Ethics Hotline is a confidential and anonymous alternative means to report concerns for those employees who are not comfortable directly approaching their supervisors.

Employees can access the hotline confidentially by clicking on the "Ethics Hotline" website button, located on the intranet, or by calling toll free 888-309-1742. Website and telephone access are both available in English and Spanish 24 hours per day, 7 days per week.

### **EXAMPLE #9**

Sanjay, a Plant Schedule Coordinator, often notices his coworker Sam whistle at Sarah, a new hire. Sanjay is concerned that Sam's behavior might violate the Harassment Policy and the Code of Conduct.

**Question:** Sanjay should:

- A ) Notify his supervisor.
- B ) Notify a member of management.
- C ) Notify his HR Generalist.
- D ) Make an anonymous call to the Ethics hotline.
- E ) Any of the above.

**Answer: E.** If an employee has a concern regarding a possible violation of this Code of Conduct, Wells wants to hear about it. Consequently, there are multiple ways to make sure that the concern is addressed. Though employees are encouraged to first contact their supervisors, they are free to select the method that works best for them.





## AMBASSADORS OF THE BRAND

Always remember – we are all ambassadors of the Blue Bunny® brand. Whether on or off the job, we are representatives of Wells Enterprises.

All employees are expected to act legally, use good judgment, and be guided by Wells' Core Values:  
Honesty, Respect, Integrity, Discretion, Humility, and Accountability.

With these values serving as our ethical roadmap, Wells and its employees are sure to remain on the pathway to success.

