

CODE OF CONDUCT & ETHICS



PSSI™

**FOOD SAFETY
SOLUTIONS**

UPDATED 1-2024

CONTENTS

- PSSI MISSION, VISION & CORE VALUES..... 1**
- PURPOSE OF THIS CODE OF CONDUCT AND ETHICS 2**
 - I. COMPLIANCE WITH LAWS, RULES, AND REGULATIONS 3
 - II. CONFLICTS OF INTEREST 3
 - III. CONFIDENTIALITY 4
 - IV. ANTI-MONEY LAUNDERING 4
 - V. INSIDER TRADING 5
 - VI. CORPORATE OPPORTUNITIES 5
 - VII. COMPETITION AND FAIR DEALING 5
 - VIII. ANTITRUST..... 5
 - IX. POLITICAL CONTRIBUTIONS..... 6
 - X. ANTI-BRIBERY POLICY 6
 - XI. DISCRIMINATION, RETALIATION, AND HARASSMENT 8
 - XII. EMPLOYMENT ELIGIBILITY VERIFICATION 8
 - XIII. HEALTH AND SAFETY 9
 - XIV. ENVIRONMENTAL 9
 - XV. RECORD-KEEPING, FINANCIAL CONTROLS, AND DISCLOSURES..... 9
 - XVI. PROTECTION AND PROPER USE OF COMPANY ASSETS 10
 - XVII. TRADE ISSUES & SANCTIONS 10
 - XVIII. IMPROPER INFLUENCE ON CONDUCT OF AUDITORS 11
 - XIX. WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS 11
 - XX. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR..... 11
 - XXI. REPORTING PROCEDURE 11
- CONTACT INFORMATION 12**

PSSI MISSION, VISION & CORE VALUES

Our organizational core values are the driving force behind our mission to help keep food safe for all. With a strong emphasis on safety, integrity, and a culture deeply ingrained with compliance, these values help guide our journey. Regardless of your role at PSSI, these values should guide your business decisions, anchoring our commitment to compliance and doing the right thing.



To be the premier protection company committed to owning the standard of health and safety for all we serve.

VISION

MISSION

We ensure a safer food supply while helping team members and partners achieve their goals.

VALUES

WE PERFORM ALL OF THIS WITH A STEADFAST COMMITMENT TO ETHICAL BUSINESS PRACTICES AND RIGOROUS COMPLIANCE.

SAFETY	INTEGRITY	TEAM	CUSTOMER	ACHIEVEMENT
PROTECT WHAT MATTERS We are committed to the health and safety of our team members and set the standard of food safety for the protection of our customers' products and brands.	DO AND SAY THE RIGHT THING We speak with candor, act with transparency, follow through on our commitments and abide by our principles and values.	WIN AS A TEAM We respect and value our team members, embrace diversity, and invest in their development through coaching and training.	SERVE WITH PASSION We strive to exceed our internal and external customers' expectations through open communication, relationships, and continuous improvement.	LEAD THE WAY We manage our business to provide opportunities and stability for our team members, and bring value to our customers, owners and the communities we serve.

PURPOSE OF THIS CODE OF CONDUCT AND ETHICS

This Code of Conduct and Ethics (the “Code”) covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all team members, officers, and directors of the company; its subsidiaries; and affiliates of PSSI Holdings, LLC (the “Company”). Please consult the PSSI Team Member and Safety Handbooks for more specific rules. All our team members, officers, and directors must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by the Company’s agents and representatives.

If a law, rule, or court order conflicts with a policy in this Code, you must comply with the law, rule, or court order. If you have any questions about these conflicts, you should immediately ask your supervisor, manager, or Human Resources on how to handle the situation. You may also call the PSSI **WeCare toll-free line at (844) 880-0009** or go online to **wecare.pssi.com**. Team members, officers, and directors are responsible for understanding the legal and policy requirements that apply to their jobs and report any suspected violations of law, this Code, or Company policy to their supervisor or Human Resources. You may report any concerns or potential violations to your supervisor, Human Resources, or the legal or compliance department.

Acting with integrity and doing the right thing are driving forces behind the Company’s success. From the very beginning, our Company has been committed to ethically conducting its business—doing right by our team members, customers, vendors, suppliers, communities, and stockholders. The Company requires its team members, officers, and directors to conduct themselves and the Company’s business in the most ethical manner possible. We share the responsibility for protecting and advancing the Company’s reputation, and ethics and values must drive our business strategies and activities. This Code provides you with the guidelines for meeting your ethical and legal obligations at the Company.

Understanding and Upholding Responsibilities:

At PSSI, we place great emphasis on adhering to laws, maintaining integrity, and embracing the responsibilities outlined in our code of conduct. It is essential for all team members to familiarize themselves with the code of conduct and underlying policies, ensuring they align their business decisions with the guidelines and intent of our ethical standards.

- 1. Comprehend the Code and underlying policies:**
 - Take the time to read and understand the Code and associated policies thoroughly.
- 2. Adhere to stated principles and company policies in all business decisions:**
 - Make business decisions in alignment with the principles and policies outlined by the company.
- 3. Seek guidance when a course of action is unclear:**
 - Don’t hesitate to ask questions and seek guidance if you find yourself uncertain about the best course of action.
- 4. Report known, suspected, or potential violations:**
 - Act responsibly by promptly reporting any known, suspected, or potential violations of our Code, company policies, or the law.

In cases where ethical investigations become necessary, any reported violations will be carefully handled by investigators from various departments, including human resources, compliance, safety, and legal. Depending on the nature of the report, external parties may also be involved. The assigned investigators will assess whether misconduct has occurred, and if so, PSSI will respond promptly and appropriately.

Confidentiality is paramount throughout this process. The responsible team members at PSSI will make every effort to keep reports and investigations confidential, disclosing information only when necessary for a thorough investigation or to provide a fair process to those accused of misconduct. While striving to protect the confidentiality of all participants, PSSI typically refrains from disclosing investigation outcomes or specific actions taken, unless required by law. In certain instances, team members may be requested to assist with an investigation, and cooperation is a requirement in such cases. Regardless of involvement, interference with an investigation, providing false information, disclosing details to third parties, or altering/destroying records is strictly prohibited. Your commitment to upholding these responsibilities ensures a workplace founded on integrity and ethical conduct.

I. COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. All team members, officers, and directors must respect and obey the laws, rules, and regulations of all relevant jurisdictions, including but not limited to, the cities, counties, states, and countries in which we operate. Although team members, officers, and directors are not expected to know the details of each of these laws, rules, and regulations, it is important to know enough to determine when to seek advice from supervisors, managers, or other appropriate personnel. If you are uncertain about any law, rule, or regulation, you should contact your supervisor, Human Resources, or the legal/compliance department. You may also call the PSSI **WeCare toll-free line at (844) 880-0009** or go online to **wecare.pssi.com**.

II. CONFLICTS OF INTEREST

A conflict of interest exists when a person's private interest interferes in any way, or even appears to interfere with the interests of the Company or its customers. A conflict situation can arise when a team member, officer, or director takes actions or has interests that may make it difficult to objectively and effectively perform their Company work. It is immaterial whether the team member was originally aware of the conflict. A team member that discovers a conflict during or after-the-fact must report it and discontinue the arrangement or activity.

Conflicts of interest may also arise when a team member, officer, or director (or a member of their family) receives improper personal benefits due to their position in the Company. Loans or guarantees of obligations to team members, officers, directors, and/or their family members by the Company may create conflicts of interest.

It is a conflict of interest for a Company team member, officer, or director to work for a competitor, customer, or supplier. You should avoid any direct or indirect business connection with our customers, suppliers, or competitors, except as required on our behalf. Such work and/or activities shall include, but are not limited to, directly or indirectly competing with the Company in any way, or acting as an officer, director, team member, consultant, stockholder, volunteer, lender, or agent of any business enterprise of the same nature as, or which is in direct competition with, the business in which the Company is now engaged or in which the Company becomes engaged during the term of your employment with the Company, as may be determined by the Company in its sole discretion.

Conflicts of interest are prohibited as a matter of Company policy, except as approved by the Chief Executive Officer ("CEO") of the Company. This Code does not attempt to describe all possible conflicts of interest that could develop. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor, manager, or Human Resources. Any team member, officer, or director who becomes aware of a conflict or potential conflict must report it immediately to a supervisor, manager, or Human Resources.

Nothing in this Code is intended to interfere with your rights under federal and state laws, including the National Labor Relations Act (“NLRA”), nor will the Company construe this Code in a way that limits such rights. Team members have the right to engage in or refrain from activities protected by the NLRA.

III. CONFIDENTIALITY

Team members, officers, and directors must maintain the confidentiality of sensitive and/or proprietary information entrusted to them by the Company or its customers or suppliers, except when disclosure is authorized in writing by the Company’s Chief Financial Officer (“CFO”) or required by laws or regulations. Proprietary information includes all non-public information of the Company and intellectual property—such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, and any unpublished financial data and reports. Sensitive and/or proprietary information may also include information related to the Company’s clients, officers, team members, vendors, and other business relations. Disclosing such information might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed. This includes information that suppliers and customers have entrusted to us.

Information that has been made public by the Company, such as Company-approved press releases, news articles, or advertisements, is not considered confidential and does not require protection.

It is the responsibility of each of us to use discretion in handling Company information so that we do not inadvertently reveal confidential information to competitors, vendors, suppliers, friends, and/or family members. If you are unsure about whether certain information is confidential, presume that it is. As always, you may contact your supervisor, Human Resources, the legal or compliance department, or the PSSI **WeCare toll-free line at (844) 880-0009** or go online to **wecare.pssi.com** with any questions. The obligation to preserve proprietary information continues even after employment ends.

IV. ANTI-MONEY LAUNDERING

The Company designs its operations to ensure that our team members, products and services will be used only for legitimate purposes. We are committed to fully complying with all applicable anti-money laundering (“AML”) and terrorist finance laws, rules, and regulations. You must not participate in or facilitate money laundering; doing so, even unintentionally, could result in civil and criminal penalties against you and the Company. Therefore, you must:

- Know your AML responsibilities;
- Not engage in conduct that is designed to, or does evade or avoid, the Company’s financial crime compliance controls;
- Know your team members or customers and obtain all identification information required by laws, regulations and our policies and the standards specific to your country;
- Be alert to and promptly report any adverse media, or other information available in the public domain related to team members, current or prospective customers that you identify, which could be relevant to the management of financial crimes risk; and
- Be alert to and promptly report any unusual or potentially suspicious activity (including activity that has already occurred or was attempted) that could involve money laundering or terrorist financing, could be designed to evade reporting requirements, has no apparent business or lawful purpose or is not the type

of transaction in which a team member, customer, or potential customer normally would be expected to engage, including activity involving a team member, customer, or potential customer's source of funds.

If you have any questions, please consult with the Company's Chief Compliance Officer.

V. INSIDER TRADING

All non-public information about the Company should be considered confidential information. Team members, officers, and directors who have access to confidential information about the Company or any other entity are not permitted to use or share that information for the purpose of trading in securities, investing, or for any other purpose except to conduct Company business. To use non-public information for personal financial benefit or to share it with, or "tip", others who might make an investment decision based on this information is unethical and illegal. If you have any questions, please consult with the Company's Legal department or your personal legal counsel when appropriate.

VI. CORPORATE OPPORTUNITIES

Team members, officers, and directors are prohibited from taking opportunities that are discovered through the use of corporate property or information for themselves without the consent of the Board. No team member, officer, or director may use corporate property or information for personal gain, and no team member, officer, or director may compete directly or indirectly with the Company. Team members, officers, and directors owe a duty to the Company to advance the Company's interests when the opportunity to do so arises.

VII. COMPETITION AND FAIR DEALING

We seek to fairly and honestly outperform our competition. We seek competitive advantages through superior work effort—never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner of such information's consent, or inducing such disclosures by past or present team members of other companies is prohibited by Company policy and potentially illegal. Each team member, officer, and director should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors, and team members. No team member, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers or suppliers and against competitors. No gift or entertainment should ever be offered, given, requested, provided or accepted by any Company team member, officer or director, family member of an team member, officer or director, or agent unless it (1) is not a cash gift; (2) is consistent with customary business practices; (3) is reasonable in fair market value not to exceed \$100; (4) cannot be construed as a bribe or payoff; and (5) does not violate any laws, regulations or applicable policies of the other party's organization. Please discuss with your Vice President, Human Resources, or the Legal department any gifts or proposed gifts if you are not certain whether they are appropriate or legal.

VIII. ANTITRUST

Antitrust laws in the United States and other countries are intended to preserve a free and competitive marketplace. The Company requires full compliance with these laws. Team members, officers, and directors must not discuss with competitors how the Company prices, markets, services, or otherwise competes. Team members, officers, and directors must not share confidential business information with our competitors and must not engage in any conduct that could unreasonably restrict

our competitors' access to the market. Antitrust laws are complex and can be difficult to understand. Team members, officers, and directors should seek advice from the legal or compliance department when dealing with antitrust issues.

No team member, officer or director is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar activities. The Company will fully cooperate with law enforcement and other agencies to pursue anyone engaged in illegal activities to protect the Company's good name.

IX. POLITICAL CONTRIBUTIONS

Except as approved in advance by the CEO or CFO, the Company prohibits political contributions (directly or through trade associations) by the Company. This includes (1) any contributions of Company funds or other assets for political purposes, (2) encouraging or soliciting individual team members to make any such contribution, or (3) reimbursing a team member for any contribution. Individual team members are free to make personal political contributions as they see fit, provided the personal political contribution is not a bribe or otherwise violates the law (including the U.S. Foreign Corrupt Practices Act ("FCPA")) or the Company's Anti-Bribery Policy in Section IX below. Team members must make every effort to ensure that they do not create the impression that they speak or act on behalf of the Company with respect to political matters and may not use company resources for any political activity or engage in political activity on company time without advanced approval by the CEO or CFO.

X. ANTI-BRIBERY POLICY

The Company is committed to always conducting business with integrity, through fair and honest competition in the marketplace. The Company has adopted this Anti-Bribery Policy to comply with the requirements and restrictions of the FCPA, the Canadian Corruption of Foreign Public Officials Act, and any other applicable anti-bribery laws, including state and local laws. This Anti-Bribery Policy applies to all of the Company's domestic and foreign operations, including operations conducted by any departments, subsidiaries, agents, consultants or other representatives, and any joint ventures in which the Company is a participant.

The FCPA is a law with criminal provisions that prohibits any form of bribery of a foreign official, and requires books and records that accurately and fairly reflect transactions. The FCPA prohibits the paying, promising, offering, or authorizing the payment of anything of value, directly or indirectly, to any foreign government official, government agency, political party, or political candidate (collectively, Government Official) in exchange for a business favor, or when otherwise intended to influence the action taken by any such individual or agency or to gain or retain any competitive or improper business advantage. The prohibitions of the FCPA apply to actions taken by all team members and by all outside parties engaged directly or indirectly by the Company (e.g., consultants, professional advisers, etc.). Under the FCPA, "anything of value" includes money, gifts, travel, exclusive deals, and jobs, whether given directly to the Government Official or indirectly to others on their behalf. In addition, the U.S. government has many laws and regulations regarding business gratuities that may be accepted by U.S. Government Personnel. State and local governments, as well as foreign governments, often have similar rules. Company team members must not pay, promise, offer, or authorize the payment of anything of value, directly or indirectly, to any Government Official, whether on the local, regional, or national level, except as set forth in this Anti-Bribery Policy.

The FCPA imposes severe penalties on both companies and individuals. Corporations and other business entities are subject to a fine of up to \$2,000,000 per violation, or twice the amount of the benefit that the violator obtained as a result. Individuals, such as officers, directors, stockholders, team members, consultants, and agents, are subject to a fine of up to \$250,000 per violation, or twice the gross gain or loss, and imprisonment for up to five years. The promise, offer, or delivery to an official

or affiliate of the U.S. government of a gift, favor, or other gratuities in violation of these rules would not only violate Company policy but may also constitute a civil or criminal offense.

While the FCPA does, in certain limited circumstances, allow nominal “facilitating” or “expediting” payments to be made, other foreign anti-bribery laws do not contain such exceptions. Facilitating or expediting payments are generally small payments to a government team member to expedite or secure a strictly routine governmental action, such as basic document processing, police, mail, and utilities services. The Company prohibits the making of facilitating or expediting payments, as do applicable laws.

Sometimes it may be necessary for the Company to work with outside consultants, agents, or other business partners. A company can face liability based on improper payments made by these kinds of third parties. Accordingly, except as set forth in this Anti-Bribery Policy, neither the Company nor any of its team members, consultants, agents, or business partners shall make, promise or authorize any gift, payment or offer anything of value on behalf of the Company to a Government Official or to any third person (such as a consultant, representative, or agent) who, in turn, could make a gift, payment or offer anything of value to a Government Official. This includes excessive commissions, large discounts, or other cost or fee-shifting arrangements with any consultants, agents, or other business partners. No team member of the Company may retain a consultant, agent, or other outside party that will have contact with any foreign or U.S. Government Official until such outside party has provided an anti-bribery certification, and the Legal department has reasonably concluded, after performing sufficient due diligence, that such retained party understands and will fully abide by the FCPA and any other applicable anti-bribery laws, this Anti-Bribery Policy, and other applicable policies in this Code.

This Anti-Bribery Policy also applies to political contributions. The Company’s policy with respect to political contributions is set forth above in Section VII. Individual team members are free to make personal political contributions as they see fit, provided the personal political contribution is not a bribe or does not otherwise violate the FCPA, this Anti-Bribery Policy, or relevant campaign finance laws.

The Company may decide to give back to the communities in which it does business. The FCPA permits reasonable donations to foreign charities; however, the Company needs to be certain that donations to foreign-based charities will not be used to disguise illegal payments to foreign Government Officials in violation of the FCPA. Whether foreign charitable donations are proper is considered on a case-by-case basis. The Company should not create even the appearance of impropriety. **Therefore, no donation to a non-U.S. charitable entity may be made on behalf of the Company without the prior approval of the Legal department.**

The FCPA does permit companies to pay for reasonable and legitimate expenses directly related to the promotion, demonstration, or explanation of products or services, or the execution or performance of a contract with a foreign government or agency. These reasonable expenses are allowed under the Anti-Bribery Policy only if they have been pre-approved by the Legal department. For example, reasonable and legitimate expenses for meals, sponsorship of seminars or educational programs, or hosting a tour of Government Officials at a Company facility, may be permitted under the FCPA and other anti-bribery laws. **Any such expenses must be pre-approved by the CEO and/or CFO as well as the legal department and must be accurately recorded in the Company’s books and records.**

All team members, officers, and directors must comply with this Anti-Bribery Policy and contact the Legal department with any questions concerning the Company’s and their obligations under the FCPA or concerning any transaction that they suspect may be in violation of the FCPA; any other federal, state, local, or foreign law or regulation; or this Code.

All team members, officers, and directors have the responsibility to report observed or suspected violations of this Anti-Bribery Policy. If you know of or suspect bribery or other improper payments or attempted or solicited bribery or improper payments in the Company's operations, you should report it to the Company's Legal department immediately. The Company does not tolerate any retaliatory acts against anyone who makes a good faith report of suspected bribery or improper payments.

XI. DISCRIMINATION, RETALIATION, AND HARASSMENT

The diversity of the Company's team members is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age, disability, genetic information, or any other protected class under applicable federal, state, and local laws. Team members must comply with all anti-discrimination, anti-retaliation, and anti-harassment laws whether local, state, or federal. Please consult the PSSI Team Member Handbook for more details on the Company's policies.

If any team member, officer, or director believes anyone at the Company has harassed them or another team member, they should immediately report the incident to their supervisor, manager, Human Resources, or the WeCare line at (844) 880-0009. Similarly, supervisors and managers who learn of any such incident should immediately report it to Human Resources. Human Resources will promptly and thoroughly investigate any complaints and take appropriate action.

XII. EMPLOYMENT ELIGIBILITY VERIFICATION

The Company is dedicated to complying with all applicable laws and regulations regarding employment eligibility verification, including but not limited to the Immigration Reform and Control Act ("IRCA"). To that end, the Company only employs those who are legally authorized to work and are 18 years of age and older and not currently enrolled in high school.

The Company is an E-Verify employer. E-Verify allows for the electronic uploading and verification of a team member's Form I-9 in connection with onboarding or reverification of their employment eligibility. Team members who complete the Form I-9 on the Company's behalf are still responsible for reviewing and determining whether the employment authorization documents presented by the new or re-verifying team member appear genuine and related to the person who has presented them. The team members are also responsible for confirming that, based on such documents, the team member is 18 years of age and older.

The Company requires that all team members involved in hiring undergo regular employment eligibility verification compliance training. Team members required to complete the training are identified by their managers in coordination with Human Resources. The training is conducted semi-annually, and attendance is mandatory. Additionally, the Company conducts regular internal audits of its employment eligibility verification compliance. The audits ensure adherence to the employment eligibility verification policy and help identify any parties who violate the policy.

All team members are responsible for helping the company comply with this policy and applicable laws. Therefore, if a team member has a good faith reason to believe that another is unauthorized to work in the United States and/or is below the company required working age, that team member must report their concern to their supervisor or Human Resources. For example, a good faith reason to believe someone is not of legal working age may arise if they need to schedule meetings or working hours around their school schedule. Under such circumstances, please contact your supervisor or Human Resources to report your concern. Please note that a team member's national origin does not constitute a good faith reason to believe that they are below the company required working age or unauthorized to work in the United States. Team members must

also report concerns about their own authorization status, as well as any information or suspicions about potential violations regarding the Form I-9 process, E-Verify, or the employment eligibility verification process generally.

In accordance with applicable law, the Company will not inquire unnecessarily about citizenship, national origin, or immigration status during the recruitment process. As set forth above, the Company is an equal opportunity employer and does not tolerate discrimination based on any protected class under applicable law.

Team members should contact Human Resources to raise any concerns regarding employment eligibility verification compliance, as well as any questions regarding training or internal audits.

XIII. HEALTH AND SAFETY

The Company strives to provide each team member, officer, and director, as well as customers, vendors, or other visitors, with a safe and healthy work environment. Each team member, officer, and director have the responsibility for maintaining a safe and healthy workplace for all team members, officers, and directors by following environmental, safety, and health rules and practices and by reporting accidents, injuries and unsafe equipment, practices, or conditions.

All Company locations must remain in compliance with the Occupational Safety and Health Act (“OSHA”) and all other applicable health, environmental, and safety laws and regulations. Safety issues and violations of regulatory requirements will be promptly addressed. In addition to meeting our obligations, the Company will take proactive initiatives to make safety a overriding priority. Team members, officers, and directors are charged with the responsibility for maintaining safe practices and conditions in everything they do and report anything that threatens anyone’s safety.

If any team member observes a potential health, environment, or safety hazard or concern, they must immediately report such hazard or concern to their supervisor, Human Resources, the Legal Department, or through the PSSI WeCare toll-free line at (844) 880-0009 or online at wecare.pssi.com.

Team members, officers, and directors are expected to perform their Company related work in a safe manner, free of the influences of alcohol, illegal drugs, or controlled substances. The use of illegal drugs in the workplace will not be tolerated, and team members should report any suspicion of such use to their supervisor, Human Resources, the Legal Department, or through the PSSI WeCare toll-free line at (844) 880-0009 or online at wecare.pssi.com.

XIV. ENVIRONMENTAL

The Company expects its team members, officers, and directors to follow all applicable environmental laws and regulations. If you are uncertain about your responsibility or obligation, you should check with your supervisor or the legal or compliance department for guidance. You should immediately report to management any emergencies or other scenarios involving any types of potential environmental harm to any persons or property.

XV. RECORD-KEEPING, FINANCIAL CONTROLS, AND DISCLOSURES

We rely on our books and records to report our financial results, make required legal filings, and make business decisions. The Company requires honest, accurate and timely recording and reporting of all business dealings and information to make responsible business decisions.

All business dealings must be documented and recorded accurately in a timely manner. This includes but is not limited to any team member business expenses submitted for reimbursement. If you are not sure whether a certain expense is legitimate, ask your supervisor or controller. Policy guidelines are available from your controller.

All of the Company's books, records, accounts and financial statements must be maintained in detail; must appropriately reflect the Company's transactions; must be made promptly without false or misleading information; must be promptly disclosed in accordance with any applicable laws or regulations; and must conform both to applicable legal requirements and to the Company's system of internal controls. Any team member who becomes aware of any inadvertent or unauthorized disclosure of information discussed in this Section must notify the legal or compliance department immediately.

If any team member, officer, or director has concerns or complaints regarding accounting or auditing matters of the Company, then they are encouraged to submit those concerns by one of the methods described in the "Compliance Procedures" section below.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to e-mail, internal memos, and formal reports. Records should always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, please consult with the legal or compliance department in the event of threatened or actual litigation or governmental investigation.

XVI. PROTECTION AND PROPER USE OF COMPANY ASSETS

All team members, officers, and directors should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets are to be used for legitimate or authorized Company purposes. Company issued cell phones may be used for personal use as outlined in the Company Equipment Policy set forth in the Team Member Handbook. Any suspected incident of fraud or theft, including theft of time, should be immediately reported to management for investigation. Unless approved by the CEO or CFO, Company assets should not be used for non-Company business.

The obligation of team members, officers, and directors to protect the Company's assets includes the Company's proprietary information. Proprietary information includes intellectual property-such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, and any unpublished financial data and reports. Nothing in this Code is intended to interfere with your rights under federal and state laws, including the National Labor Relations Act, nor will the Company construe this Code in a way that limits such rights. Team members have the right to engage in or refrain from activities protected by the National Labor Relations Act.

Unauthorized use or distribution of the Company's intellectual property or other confidential information is a violation of Company policy. It may also be illegal and result in civil or criminal penalties.

XVII. TRADE ISSUES & SANCTIONS

From time to time, the United States, foreign governments, and the United Nations have imposed boycotts and trading sanctions against various governments and regions, which must be obeyed. Advice regarding the current status of these matters must be obtained from the legal or compliance department. If you are unsure as to whether your work implicates such issues, please contact the legal or compliance department.

XVIII. IMPROPER INFLUENCE ON CONDUCT OF AUDITORS

It is prohibited to directly or indirectly take any action to coerce, manipulate, mislead, or fraudulently influence the Company's independent auditors for rendering the financial statements of the Company materially misleading. Prohibited actions include, but are not limited to, those actions taken to coerce, manipulate, mislead or fraudulently influence an auditor (1) to issue or reissue a report on the Company's financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards, or other professional or regulatory standards); (2) not to perform an audit, review or other procedures required by generally accepted auditing standards or other professional standards; or (3) not to communicate matters to the Company's legal or compliance department.

All team members who are involved in the Company's audit process or recordkeeping are responsible for providing full, fair, and accurate information. Any violation of this policy may also be a violation of civil and criminal laws.

XIX. WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS

Any waiver of this Code for team members, executive officers or directors may be made only by the Board and will be promptly disclosed as required by law or regulation.

XX. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

Team members are encouraged to talk to supervisors, managers, Human Resources, the legal or compliance department, or contact the PSSI WeCare line at (844) 880-0009 or go online to wecare.pssi.com about observed behavior that they believe may be illegal or a violation of this Code or Company policy, or when in doubt about the best course of action in a particular situation. The Company will immediately and thoroughly investigate all such concerns and take appropriate action. The Company will not allow retaliation for reports made in good faith by team members of misconduct by others. Team members are expected to cooperate in internal investigations of misconduct in good faith.

XXI. REPORTING PROCEDURE

All team members, officers, and directors have the responsibility to report observed or suspected violations of the law, this Code and any activity that might constitute financial fraud or financial misconduct. We must all work to ensure prompt and consistent action against violations. However, not all situations are clear-cut. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. When in doubt, it is best to contact your supervisor or another member of management. You may also direct questions to the PSSI WeCare line at (844) 880-0009 or go online to wecare.pssi.com. Below are additional steps to keep in mind:

(1) Immediately report good faith suspicions of a violation of this Code or applicable laws. Team members should not undertake their own investigations of potential violations. Any investigation must be handled by Company management in accordance with this Code and applicable laws. It is the team member's responsibility to report concerns and cooperate in investigations in good faith.

(2) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

(3) **Discuss the problem with your Manager, Area Manager, Division Manager, Vice President, Senior Vice President, Human Resources, or, for compliance issues, with the legal or compliance department.** This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager’s responsibility to help solve problems. If you are uncomfortable discussing the problem with your supervisor, you can talk to Human Resources or contact the PSSI WeCare line at (844) 880-0009 or go online at wecare.pssi.com. If your question relates to any compliance issues addressed in this Code, you can talk to the Company’s legal or compliance department.

(4) **You may report violations without fear of retaliation.** The Company will make its best efforts, within the bounds of the law, Company policy, and the specific circumstances of the situation, to protect a reporting team member’s anonymity upon their request. The Company does not permit retaliation of any kind against team members, officers, or directors for good faith reports of suspected violations.

(5) **Always ask first, act later.** If you are unsure of what to do in any situation, seek guidance before you act.

(6) **All team members, officers, and directors are subject to the Company’s Code, which describes procedures for the internal reporting of violations of the Code.** All team members, officers, and directors must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this Code by any team member, officer, or director will result in disciplinary action up to and including termination.

CONTACT INFORMATION

For questions about this Code of Conduct and Ethics, please contact your supervisor, manager, or any of the individuals below.

Chief Compliance Officer	Diego Alvarez	(479) 372-1036	dalvarez@pssi.com
Ethics Manager	Camila Meyer	(608) 568-2254	cmeyer@pssi.com
Chief Human Resources Officer	Jeanette Bruni	(608) 568-2203	jbruni@pssi.com
Corporate Human Resources Vice President	Amanda Vaassen	(608) 568-2121	avaassen@pssi.com
Chief Legal Officer	Santiago “Jimmy” Alaniz	(210) 468-5285	salaniz@pssi.com

WeCare Hotline (844) 880-0009 wecare.pssi.com
 Anonymous / Confidential / Toll-Free / Easy to Use / Accessible 24/7