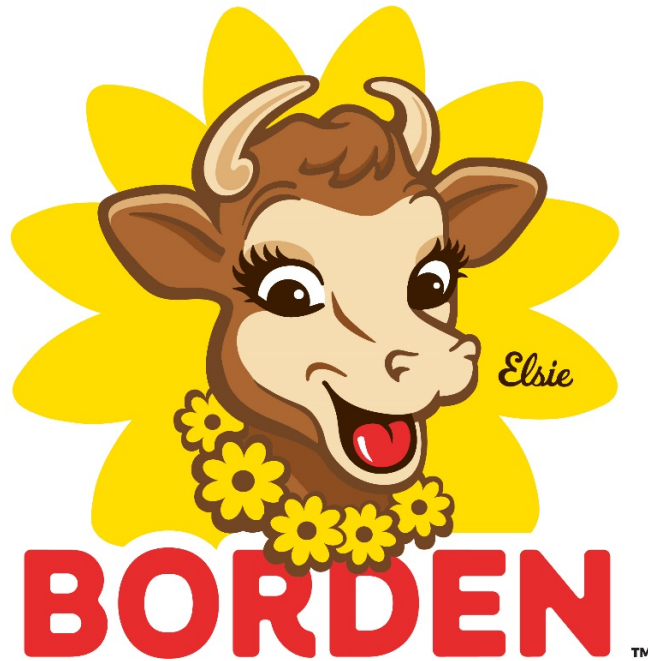


EMPLOYEE HANDBOOK



THIS EMPLOYEE HANDBOOK SUPERSEDES ALL PREVIOUSLY ISSUED EMPLOYEE HANDBOOKS FOR NEW DAIRY OPCO, LLC AND ALL OF THEIR AFFILIATED PLANTS, OFFICES AND COMPANIES THROUGHOUT THE UNITED STATES INCLUDING ITS DIVISIONS, AFFILIATES, HOLDING COMPANIES, AND SUBSIDIARIES (collectively, the "Company")

Revised 07/20/2020



ACKNOWLEDGMENT AND AUTHORIZATION (Employee Copy)

(To be signed and retained in this Handbook)

I HEREBY ACKNOWLEDGE RECEIVING A COPY OF THE COMPANY EMPLOYEE HANDBOOK. I UNDERSTAND THAT I AM RESPONSIBLE FOR FAMILIARIZING MYSELF WITH THE INFORMATION CONTAINED IN THIS HANDBOOK. I ALSO UNDERSTAND THAT THE COMPANY MAY OCCASIONALLY CHANGE THE POLICIES, PROCEDURES, AND PRACTICES OUTLINED IN THIS HANDBOOK, INCLUDING, WITHOUT LIMITATION, BY POSTING ON THE COMPANY'S INTRANET SITE OR OTHERWISE COMMUNICATING TO EMPLOYEES. FURTHER INFORMATION OR INTERPRETATION OF COMPANY POLICIES WILL BE PROVIDED, UPON REQUEST, BY HUMAN RESOURCES.

I UNDERSTAND THAT NEITHER THE STATEMENTS IN THIS HANDBOOK NOR THIS ACKNOWLEDGMENT CONSTITUTES A CONTRACTUAL OBLIGATION, EXPRESS OR IMPLIED, ON THE PART OF THE COMPANY PERTAINING TO ANY PORTION OF THIS HANDBOOK OR ANY ASPECT OF MY EMPLOYMENT. INFORMATION IS PROVIDED IN THIS HANDBOOK TO GIVE ME A GENERAL OVERVIEW OF THE COMPANY'S EXPECTATIONS OF ITS EMPLOYEES AND TO PROVIDE INFORMATION AND GUIDELINES, POLICIES, PROGRAMS, AND PROCEDURES OF THE COMPANY.

FURTHERMORE, I HEREBY AUTHORIZE AND CONSENT TO THE SEARCH OF ANY COMPANY PROPERTY OR OTHER SEARCHES ON COMPANY PREMISES, AS DESCRIBED IN THE COMPANY EMPLOYEE HANDBOOK AND IN ACCORDANCE WITH APPLICABLE STATE LAW.

I HAVE READ THE FOREGOING AND HAVE HAD AN OPPORTUNITY TO ASK ANY QUESTIONS.

EMPLOYEE SIGNATURE

DATE

EMPLOYEE NAME (PLEASE PRINT)



ACKNOWLEDGMENT AND AUTHORIZATION (HR Copy)

(To be signed, detached and filed in employee's employment file)

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EMPLOYEE SIGNATURE

DATE

EMPLOYEE NAME (PLEASE PRINT)



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Disclaimer Statement

This handbook is designed to provide information to employees of the Company regarding various policies, practices, procedures, and benefits that may apply to them. The Company and its employees acknowledge that their relationship is at-will and either the employee or the Company may terminate the employment relationship at any time, for any reason not prohibited by law, with or without notice.

The Company reserves the right to add, modify, alter, or eliminate all benefits, policies, and procedures set forth herein at any time, with the exception of employment at will. Neither this manual nor its contents constitute, in whole or in part, either an expressed or implied contract of employment or otherwise between the Company and any employee, and they should not be construed or interpreted as such by anyone.

The statements contained in this handbook regarding the Company's policies, benefits, and employment practices are in condensed form. While this handbook is not intended to state all of the conditions of employment and all of the principles that will help to guide the Company's employees in the performance of their duties, it and any supplementary publications and communications will give you general information in regard to certain policies and benefits that are in effect at this time. This handbook is not intended to create any contractual obligations between the Company and any of its employees.

The information and guidelines contained in this employee handbook supersede any prior policies or instructions that may have been provided.

Oral statements on the part of supervisors, managers, or other employees of the Company concerning any employee's conditions of employment are not contractual in nature and should not be considered as such. At times and in some cases, the application of these policies may be affected by present or future government regulations or state or local laws.

Circumstances may arise in which management finds it necessary to take other action not specifically designated in this handbook. The Company reserves the right to do so at its discretion. Changes may be made and enforced from time to time at the Company's discretion.

Some sections of this handbook may not apply to you directly, based on your job classification. Should you have questions concerning anything in this handbook and its application, contact your manager or local site Human Resources representative.

Employment at-will

Employment at the Company is on an at-will basis. This means that either the employee or the Company may terminate the employment relationship at any time, for any reason not prohibited by law, with or without notice.

The Company and its employees acknowledge that their relationship is at-will and either the employee or the Company may terminate the employment relationship at any time, for any reason not prohibited by law, with or without notice.

Nothing in this employee handbook is intended to or creates an employment agreement, express or implied. Nothing contained in this or any other document provided to the employee is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any specific period of time or that employment can only be terminated for specified reasons. In addition, no Company representative is authorized to modify this policy for any employee or to enter into any agreement, oral or written, that changes the at-will relationship.



INTRODUCTION

Welcome to the Team!

We are glad you have decided to join our team! Borden is a special company that has been in American hearts and homes for more than 160 years.

As employees, we make it possible for millions of people to enjoy wholesome, delicious products every day. Every single position in our company plays an important role in this mission.

One of the things you will hear a lot about is Borden's **People First** culture. We want all employees to feel heard, appreciated, supported, and motivated. We do this by fostering an environment of respect and communication.

Even more importantly, we care about the well-being of our employees and consumers. Safety is always our number one priority. We must never lose the confidence of our consumers who have trusted Borden products for more than 160 years.

There are about 3,500 members of this Borden team, and you'll soon discover that many of them have been with Borden for decades. We hope you, too, will make Borden your lifelong home.

Congratulations on your new career, and welcome to the family!

The Borden Difference

The Borden Difference is our identity. It is our guide for growth and stewardship of the Borden brand. By continually aligning what we do – as individuals and as teams – to **the Borden Difference**, we will help our customers win, be able to invest in our people, and ensure success.

THE BORDEN DIFFERENCE

The Borden Difference is our identity; it is our guide for growth and stewardship of the Borden brand. By continually aligning what we do – as individuals and teams – to The Borden Difference, we will help our customers win, be able to invest in our people and ensure our success.

VISION
What future do we want to create together?
We see a day when Borden is the undisputed dairy leader.

MISSION
What difference do we make for our customers?
We help them win.

SIGNATURE STRENGTH
How are we different from our competitors?
We are the most service-oriented dairy company.

CORE CAPABILITIES
What organizational strengths do we need to continually develop to deliver the value we promise?
People First culture that makes us the best place to work
Customer and channel intimacy that deepens relationships
Consumer-driven products and brand that enable pure joy
Integrated, farm-to-store network that delivers the right product, at the right time, at the right price
Continuous improvement in everything we do

CORE VALUES
What behaviors are critical for our success?

- SERVANT'S HEART**
 - Put others first.
 - Find joy in helping others.
 - Treat others as they wish to be treated.
 - Go the extra mile.
- TEAMWORK**
 - Do what you say you'll do.
 - Commit personally to group results.
 - Share what you know.
- CREATIVE PROBLEM SOLVING**
 - Improvise and find a way.
 - Proactively examine all perspectives.
 - Be curious and learn from anyone, anywhere.
- PASSION TO WIN**
 - Show your optimistic, contagious desire to be the best.
 - Set stretch goals and keep score.
 - Get it done.
- FUN**
 - Enjoy the journey.
 - Celebrate success – others' and our own.
 - Appreciate each other as people, as more than just co-workers.



GENERAL EMPLOYMENT INFORMATION

Personal Information

It is important that employment records be accurate. To avoid problems with benefit eligibility, an employee's beneficiaries of Company-provided benefits, tax liability, or the Company's ability to communicate with an employee, an employee must promptly notify the local site Human Resources representative of any change in his/her name, home address, telephone number, marital status, number of dependents or any other information pertinent to employment with the Company.

Definitions of Employment Status

The following terms will be used to describe the classification of employees and their employment status:

- **Full-Time:** Employees normally scheduled to work 30 hours or more each week who are eligible for Company benefits.
- **Part-Time:** Employees normally scheduled to work fewer than 30 hours per week. Part-time employees may be eligible for specific benefits if the plan allows.
- **Exempt Employees:** Employees who are exempt from the overtime compensation provisions of state and federal wage and hour laws.
- **Non-Exempt Employees:** Employees who are subject to overtime compensation, as provided by state and federal wage and hour laws.
- **Regular Employees:** Full-time and part-time employees who have successfully completed their orientation period.
- **Contractor:** A contractor is hired for a specific job at a specific rate of pay typically through a third party. A contract employee does not become a regular addition to the staff and is not considered a Company employee.
- **Temp:** An individual typically hired to help a business meet increased short-term demand for its product or services that do not have the status of permanent staff.
- **Temp-to-Hire:** Engaging a staffing service to bring in a temp who, if the Company has a need, they perform well, and are a good match for the position, the Company will hire as an employee after an agreed-upon length of time.

Visitors

Visitor is any individual that is not currently an active employee. To provide a safe and secure work environment and to satisfy all applicable regulatory requirements, authorized visitors to Company properties should always sign-in, be escorted while in the facility, and be accounted for. Visitors are not permitted on Company premises after hours without prior approval of the appropriate department manager.

Employment Applications and New Hire Paperwork

The Company relies upon the accuracy of information contained in employment applications and resumes, as well as the accuracy of other data presented throughout the hiring process and employment period.

Applicants or employees who directly or indirectly misrepresent, falsify, or materially omit information used in the pre-employment and hiring process will be subject to elimination from further consideration for employment or could be subject to immediate termination if already employed by the Company.



Orientation Period

The first 90 days of employment will be the employee's orientation period. For the employee, the orientation period is a time for getting to know your fellow employees, your supervisor/manager, the tasks involved in your job position, as well as becoming familiar with the Company. For the Company, it is an opportunity to review the employee's suitability for employment. During this time, your personal conduct (attendance, punctuality, ability to work with fellow employees and supervisors, following policies and procedures, etc.), and job performance will be subject to close supervision, as it will for the entirety of your employment with the Company.

Completion of the orientation period does not entitle you to remain employed by the Company for any definite period. Both you and the Company are free to terminate the employment relationship, at any time, with or without notice and for any reason not prohibited by law.

Attendance

Good attendance is fundamental to the success of the Company. As such, the Company considers good attendance an essential function of every job. Attendance practices and rules may vary by department, location, and employment status. Each employee is an essential member of the team, and as such, is expected to be at work on time each scheduled day. Absences, tardiness, late returns from breaks or lunch during the shift and leaving early prior to the end of the shift are unacceptable deviations from the work schedule. Employees who are absent or late without providing notification or for unacceptable reasons may be charged with an unexcused absence or tardy, which may result in disciplinary action up to and including termination of employment. The Company recognizes that unavoidable situations may occasionally arise that require absence from work, however, 3 days no call, no show is considered job abandonment by the Company. Please consult your supervisor or the local site Human Resources representative with specific questions regarding the attendance practices and rules for your location.

Job Postings and Internal Applications

The Company believes in promoting from within when possible and is committed to employing the best candidates for approved positions and engaging in effective recruitment and selection practices in compliance with all applicable employment laws. We provide equal employment opportunity to all applicants and employees.

Once an open position is approved for recruitment, Human Resources will post the position on the internal recruitment web site. Appropriate external recruitment sources will vary depending on the vacancy and will be determined by Human Resources and the hiring manager.

The position will be posted internally for five business days, during which time eligible employees may apply ahead of external candidates. In some cases, external recruiting may take place simultaneously to expedite the process as business needs require. Internal candidates may or may not be given preference depending on the position requirements, specifications, and other circumstances.

Eligibility for Applying to Internal Jobs

Open positions are growth opportunities that offer a steppingstone into future roles which can offer more pay, better schedules, and on the job training and experience. An employee selected for a position through the interview process may be retained in the former position until a replacement is obtained, or satisfactory arrangements are made with the present branch or department. It is important to note that an employee is expected to continue to perform fully the duties of his or her current position during the period of time needed to secure a new position. Promotions should be effective with the beginning of a pay period unless an extenuating circumstance has been approved by the Human Resources Department.

This policy applies to all internal job moves including lateral, promotional, and/or geographical. To be considered for an open position, you must:

- Have worked for The Company for at least 12 months and have been in your current position for at least six months.



- Have received a rating no lower than “meets expectations” on your most recent performance review and must not currently be on a performance improvement plan.
- Be in good standing with the Company and have no written warnings currently on file.
- Must possess a positive attitude and willingness to perform the job duties, a strong desire to contribute to the mission and goals of the Company.
- Meet the minimum requirements for the job and be able to perform the essential functions of the position, with or without reasonable accommodation.

All internal applicants will receive notice from the local Human Resources representative or the department manager as to whether they will be interviewed for the position based on eligibility and qualifications. Although we encourage you to notify your supervisor that you have applied for a position, the supervisor and manager will be notified should you become a final candidate. If hired for the position, the hiring manager and your current manager will work together to determine an appropriate transfer and start date.

Dress Code and Grooming

All employees are expected to maintain high levels of professionalism in their behavior at work. This level of professionalism should be applied to appearance as well. An employee’s attire should be consistent with the type of work performed as well as being appropriate for the position held and the image the Company seeks to project. Each location may establish its own dress code, subject to approval of the site manager and the corporate Human Resources leader. Clothing must be neat, clean, and not torn. Good personal grooming and hygiene are also essential and should contribute to a professional appearance.

In warehouse and production areas, employees should make sure their clothing adheres to uniform and safety guidelines. Don’t wear loose clothing or jewelry. Tie back long hair. Always wear appropriate PPE (i.e. mask, safety glasses, steel toed shoes, bump hat, ear plugs, etc.).

Please consult your supervisor or the local site Human Resources representative with specific questions regarding dress for your role and location.

Arrests and Convictions

While the Company does not seek to interfere with the off-duty and personal lives of its employees, certain types of off-duty conduct may interfere with the Company’s legitimate business interests. Illegal off duty conduct by an employee that adversely affects the Company’s legitimate business interests or the employee’s ability to perform his or her job is prohibited. The following must immediately be reported to the local site Human Resources representative:

- Any criminal arrest or conviction, or plea of guilty or nolo contendere.
- Any governmental action that restricts the employee’s ability to work for the Company (for example, restrictions imposed by the USDA or loss of any license related to the employee’s job duties).
- Employees who are required to drive a Company vehicle or their own vehicle on Company business are required to have valid driving license, medical certification if required, as well as effective and legally sufficient insurance coverage. Employees who cannot satisfy this requirement at any time must cease driving and notify their supervisor immediately.

Arrests or convictions of an employee could result in disciplinary action, up to and including immediate termination of employment. Reporting an arrest or conviction does not necessarily mean that your employment will be terminated. The Company will consider the circumstances around the arrest or conviction, how it will impact your ability to attend work on your regular schedule, if it could impact your work performance or the performance of your co-workers, the seriousness of the crime, and any liability for the Company.



Good Housekeeping

Clean and orderly work and break areas increase productivity and reduce the chances of accidents. Maintaining a clean workplace is also a courtesy to others who work nearby. You are responsible for keeping your own work area neat and clean, as well as cleaning up after yourself in break/meeting areas. To ensure the highest level of sanitation, food consumption should be restricted to designated break areas. In certain situations, Good Manufacturing Practices (GMPs) will dictate where food/beverage consumption is prohibited.

Employee Badges

This applies to employees that work at facilities that issue employees an identification badge that gives them access to their work areas. This badge is to allow the employee to gain entrance into our facility. At no time should an employee use their badge to allow a visitor or another employee to gain entrance into any of our facilities. If an employee forgets their badge, they need to gain entrance through the front door or with a supervisor, manager, or your local Human Resources representative. Please consult your supervisor or the local site Human Resources representative regarding additional practices and rules for employee badges at your location.

Resignation

In all cases of voluntary resignation (one initiated by the employee), employees are asked to provide a written notice to their supervisor and the local site Human Resources representative at least 10 working days in advance of the last day of work. The 10 days should be actual working days. Holidays, vacation time, and/or paid time off (PTO) will not be counted toward the 10-day notice. If an employee does not provide advance notice as requested, the employee may be considered ineligible for rehire, and may forfeit any accrued and unused vacation pay in accordance with applicable state law. Employees who provide the requested amount of notice will be considered to have resigned in good standing and generally may be eligible for rehire.

Return of Company Property

All Company property and items supplied by a third party (i.e. uniforms) must be returned on or by the last day worked. If any Company property is not returned or an employee has an outstanding account with the Company, the amount of the outstanding debt may be deducted from the employee's final paycheck in accordance with applicable state law.

Rehire Eligibility

The Company may rehire former employees based on the needs of the business. Employees who were part of a reduction-in-force (RIF), as well as those employees who voluntarily resigned with an appropriate notice (minimum 10 days), may be eligible for rehire as long as they had a satisfactory work record while employed by the Company. If an employee is rehired and is collecting severance pay per a severance agreement, this will end upon rehire to the Company.

Former employees who had a less-than-satisfactory work record appropriately noted at termination as not being eligible for rehire may be excluded from rehire consideration. Employees who were involuntarily terminated by the Company or who were laid off with a less-than-satisfactory work record may not be considered for rehire.

Service Restoration Rules for Eligible Employees

If a former employee with less than one year's prior service is rehired, the employee will be considered a new employee and will not be eligible for prior service recognition for seniority or benefits plan participation purposes.

If a former employee with more than one year's prior service is rehired, the employee's seniority and eligibility to participate in Company benefits plans will be bridged if the employee is rehired within a two-year period. Service recognition will include prior service recognition for accrued leave plans.



If a former employee with more than one year's prior service is rehired and previous service has been interrupted for two or more years, the employee will be considered a new employee and will not be eligible for prior service recognition for seniority or benefits plan participation purposes.

Rehire Service Date Adjustment

When recognition of prior service is granted, a rehired employee's Company service date will be adjusted in accordance with the "Service Restoration Rules for Eligible Employees". The standard waiting period applies to a rehired employee for eligibility in benefit program participation. No Company bonus or incentive plan eligibility will be bridged for returning employees. The Company seniority eligibility standard eligibility rules apply.

PAY PRACTICES

Payment of Wages

Paydays are in accordance with the local practices. Payroll is administered through direct deposit in accordance with applicable state law. Questions regarding your pay should be addressed with your supervisor/manager. Employees can use the employee self-service system to view your payroll information online. Please see your local site Human Resources representative for additional information.

Payroll Deductions

The Company is required to deduct from each employee's wages, where applicable, federal, and state withholding taxes, social security taxes, and any garnishments or court ordered assignments.

Timekeeping Requirements

Accurately recording time worked is the responsibility of every non-exempt, hourly employee. Federal and state laws require the Company to keep an accurate record of time worked to calculate employee wages and benefits. Time worked is all the time spent on the job performing assigned duties.

Non-exempt employees should accurately record the time they begin and end their work, as well as the beginning and ending time of all break periods. They should also record the beginning and ending time of any split shift or departure from work for personal reasons.

Non-exempt, hourly employees must never perform compensable work "off the clock." If any employee, supervisor, or manager instructs or suggests a non-exempt, hourly employee work off the clock, that employee must notify the local site Human Resources representative immediately. Non-exempt, hourly employees are prohibited from working during any time that is not recorded. Non-exempt, hourly employees may not perform work before clocking in, after clocking out, or during the employee's meal break.

Altering, falsifying, tampering with time records, or recording time for another employee is prohibited and may result in disciplinary action up to and including termination of employment. If you have any reason to believe that your time record is inaccurate in any way, you must report it at once to your supervisor or manager and/or the local site Human Resources representative.

It is the employee's responsibility to verify his or her timecard/record (where applicable) to certify the accuracy of all time recorded when a manual time recording method is required. The supervisor or manager will review and approve the time record before submitting it for payroll processing. Any questions regarding timecard/record accuracy should be directed to your supervisor, manager, or the local site Human Resources representative.



Overtime

There may be times when the Company cannot meet its operating requirements or other business needs during regular working hours. If this happens, we may schedule hourly, non-exempt employees to work overtime hours.

If a non-exempt employee would like to work overtime hours, he/she must receive prior authorization from his/her supervisor before working the overtime hours. Unauthorized overtime will be subject to disciplinary action up to and including termination of employment. Overtime will be paid at one and a half (1½) times the regular hourly rate of pay. Only those hours worked in excess of forty (40) hours in a work week will be paid at the overtime rate. Time off for sick leave, vacation, holidays, or other paid or unpaid leaves of absence is not counted as hours worked when calculating overtime pay. Overtime compensation is available only to non-exempt, hourly employees.

Lunch & Break Periods

Lunch periods are typically unpaid 30- or 60-minute breaks but may vary by department, location, and employment status. The schedule for meal periods should be established based on work requirements in each department. Walking off the worksite for an unscheduled meal period is not permitted unless the employee has approval from their supervisor. Staggered meal periods may be necessary in some departments to ensure coverage throughout the workday. Meal and break periods may be combined if approved by management. The Company does not provide paid smoke breaks. Please consult your supervisor or the local site Human Resources representative with specific questions regarding lunch breaks for your location.

Business Travel and Expense Reimbursement

The Company reimburses employees for legitimate and reasonable business expenses only as determined by the Company. Expense reimbursement procedures will be done in accordance with the Company's travel and expense reimbursement guidelines. Employees who travel or incur expenses on behalf of the Company are expected to review and adhere to these guidelines.

BENEFITS

The Company has established a variety of benefit programs designed to assist you and your eligible dependents in meeting their health, dental, and vision needs as well as to help employees plan for retirement. Talk with your local site Human Resources representative for more information.

Workers' Compensation

As required by applicable state law, the Company maintains Workers' Compensation insurance. Anyone who sustains an injury while at work, no matter how minor the injury might seem, must immediately report the injury to the supervisor, manager, or the Safety Manager. This procedure ensures that the Company can assist the employee in obtaining appropriate medical treatment. Failure to follow this procedure could result in a Workers' Compensation report not being filed, which could jeopardize the employee's right to benefits in connection with the injury or illness. Any questions regarding Workers' Compensation insurance should be directed to the Human Resources Department.

The Company may provide alternate duty to employees who are transitioning back to work from a Workers Compensation injury. Alternate duty is considered active employment status, not a leave of absence.

For certain employees working at the Company's Texas locations, the Company provides compensation for legitimate on-the-job injuries through a Voluntary Employee Injury Benefits Plan, a summary of which will be provided to you. If applicable to you, it is very important that you read and understand the summary plan description of the Voluntary Employee Injury Benefits Plan.



Family and Medical Leave

The Company grants periods of unpaid leave to employees who request time off for family or medical reasons in accordance with the federal Family and Medical Leave Act (FMLA). Under the FMLA, employees may be eligible for a period of job-protected unpaid leave if you meet the criteria set forth in the FMLA.

Leave Entitlements

Eligible employees can take up to 12 weeks of unpaid, job-protected leave in a 12-month period for the following reasons:

- The birth of a child or placement of a child for adoption or foster care.
- To bond with a child (leave must be taken within one year of the child's birth or placement).
- To care for the employee's spouse, child, or parent who has a qualifying serious health condition.
- For the employee's own qualifying serious health condition that makes the employee unable to perform the employee's job.
- For qualifying exigencies related to the foreign deployment of a military member who is the employee's spouse, child, or parent.

An eligible employee who is a covered servicemember's spouse, child, parent, or next of kin may also take up to 26 weeks of FMLA leave in a single 12-month period to care for the servicemember with a serious injury or illness.

An employee does not need to use leave in one block. When it is medically necessary or otherwise permitted, employees may take leave intermittently or on a reduced schedule.

The Company requires use of accrued time off while taking FMLA leave.

Benefits & Protections

While employees are on FMLA leave, the Company will continue health insurance coverage as if the employees were not on leave. Upon return, the employee will be responsible for premiums not collected during the leave.

Upon return from FMLA leave, most employees must be restored to the same job or one nearly identical to it with equivalent pay, benefits, and other employment terms and conditions.

The Company will not interfere with an individual's FMLA rights or retaliate against someone for using or trying to use FMLA leave, opposing any practice made unlawful by the FMLA, or being involved in any proceeding under or related to the FMLA.

Eligibility Requirements

An employee must meet three criteria to be eligible for FMLA leave. The employee must:

- Have worked for the employer for at least 12 months.
- Have at least 1,250 hours of service in the 12 months before taking leave.
- Work at a location where the employer has at least 50 employees within 75 miles of the employee's worksite.

Requesting Leave

Generally, employees must give 30-days' advance notice of the need for FMLA leave. If it is not possible to give 30-days' notice, an employee must notify the Company as soon as possible and, generally, follow the Company's usual procedures.

Employees do not have to share a medical diagnosis but must provide enough information to the Company so it can determine if the leave qualifies for FMLA protection. Sufficient information could include informing the Company that the employee is or will be unable to perform his or her job functions, that a family member cannot perform daily activities, or that hospitalization or continuing medical treatment is necessary. Employees must inform the Company if the need for leave is for a reason for which FMLA leave was previously taken or certified.



The Company can require a certification or periodic recertification supporting the need for leave. If the Company determines that the certification is incomplete, it will provide a written notice indicating what additional information is required.

Company Responsibilities

Once the Company becomes aware that an employee's need for leave is for a reason that may qualify under the FMLA, the Company will notify the employee if he or she is eligible for FMLA leave and, if eligible, will also provide a notice of rights and responsibilities under the FMLA. If the employee is not eligible, the Company will provide a reason for ineligibility. The Company will notify its employees if leave will be designated as FMLA leave, and if so, how much leave will be designated as FMLA leave.

Employees who would like more information about FMLA should contact their local site Human Resources representative for more information.

Personal Leave of Absence

Under very rare circumstances, a personal leave of absence without wages may be granted to full-time employees who have been employed one year or more, and approvals will be based on business needs. This is time off for non-medical reasons and approval rests solely in the business judgment of the local Functional leader and the CHRO at the headquarters Human Resources department. If approved, you must first use all your paid time off (i.e. sick days, personal leave, PTO, and vacation days). You are responsible for the full premium for health benefits during a personal leave. The maximum length of a personal leave is 30 days. Based on business needs, your position may be filled in your absence. If you are not able to return from leave within the agreed time frame, you may, in the absolute discretion of the Company, be subject to termination or be considered for available positions upon your return to work.

Military Leave

The Company supports the men and women who serve as military reservists and members of the National Guard in performing short-term active training or emergency duty or who are called to active duty. The Company recognizes the requirements of the Uniformed Services Employment and Re-employment Rights Act (USERRA) and analogous state laws. You (or the appropriate officer of the uniformed services in which military service is to be performed) are required to provide your supervisor/manager with as much advance notice as is practicable of your uniformed service obligations, unless giving advance notice is impossible, unreasonable or precluded by military necessity, in which case notice must be provided as soon as is practicable. Notice may include copies of military orders, training notice, induction information, or other written or oral notice. For further details regarding military leave, please contact your local Human Resources Representative.

Other Leaves of Absence

The Company will comply with all applicable state and federal leave of absence laws. Several of the states where the Company does business provide additional unpaid leave of absences to cover situations such as children school programs, victim of crime leaves, emergency response leave, and other similar situations. Please contact your supervisor or local site Human Resources representative for specific information regarding other available leaves of absence in your state.

Failure to Return from Workers Compensation or Other Leave

Employees who fail to return to work at the end of a period of leave may be subject to immediate termination unless Human Resources has authorized an additional approved leave. It is the responsibility of the employee to notify their supervisor and local Human Resources representative of their release to return to work and their date of return to work. Three (3) days no call, no show is considered job abandonment by the Company. Requests for additional leave are granted at the Company's discretion.



If an employee fails to return following an FMLA leave, the Company may be entitled to recover all premiums that it paid as its contribution for maintaining coverage for the employee under group health plans.

Holiday Pay

The Company provides employees with a paid day off on specific holidays. Contact your local site Human Resources representative for additional information.

Paid Time Off (PTO) from Work

All paid time off (personal days, sick time, and/or vacation) will be dictated by local policy. Contact your local site Human Resources representative for additional information.

Bereavement Leave

In the unfortunate event of a death in the family, bereavement leave, as needed, may be granted for an immediate member of the family. Immediate family is defined as spouse, children, parents, guardians, brother, sister, employee or spouse's grandparent, mother-in-law, and father-in-law, sister-in-law, brother-in-law, and grandchild. In the event of the death of a member of your immediate family, you are permitted time off, with wages, of up to three (3) days (day before, day of and day after funeral if scheduled) following such death. Appropriate documentation may be requested for submission along with a PTO request before any wages are paid for time off.

Jury Duty

If you receive a jury summons, you should immediately advise your supervisor/manager. The Company will compensate employees called for jury duty by paying their regular pay for the time lost while on duty. Employees must provide proof of attendance before compensation will be authorized.

The Company encourages employees to appear in court for witness duty when subpoenaed. If you receive a subpoena, you should immediately advise your supervisor/manager. For either jury or witness duty, you will be expected to report for your regular duties when temporarily excused from attendance in court.

Subpoenas for reasons other than Jury Duty requiring time away from work will require use of PTO time.

Employee Assistance Program

The Company provides a confidential Life Assistance Program at no charge to the employee, including referrals to help with emotional situations, stress, anxiety, and depression, alcohol or drug dependency, financial or legal advice, marriage or family relationship issues, childcare or eldercare referrals, and parenting advice. Employees who would like more information about the Life Assistance Program should contact their local site Human Resources representative for more information.

Employee Discount Program

The Company offers an exclusive employee discount program as part of our benefits package. Employee discounts cover a wide range of products and services including auto insurance, home insurance, pet insurance, car rentals, leisure activities and much more. To learn more about the types of discounts offered, go to www.bordendairy.corestream.com.

Additional Benefits

Please see your local Human Resource representative for information regarding additional benefits.



INTERNAL AND EXTERNAL COMMUNICATION

Open-Door Policy

Our goal is to maintain a positive culture and pleasant work environment for all employees. To help us meet that goal, we have an open-door policy. That means we encourage all employees to openly communicate concerns, questions, and ideas. If something about your job is bothering you, or if you have a question, concern, idea, or problem related to work, we encourage you to discuss it with your immediate supervisor, manager, or your local site Human Resources representative as soon as possible.

Dispute Resolution

When people work together, misunderstandings may occur. If such a situation or problem should arise, we encourage you to follow the below steps:

- If comfortable, approach the other party to address the issue.
- Notify your immediate supervisor to give him/her a chance to address the issue.
- If your complaint involves your supervisor, or you are not satisfied with your supervisor's response, or if for any reason you do not wish to bring the problem to your supervisor's attention, you may present your concern to your department manager.
- If the above is unsuccessful and/or you do not feel comfortable using the above steps, contact your local Human Resources representative.
- If you do not feel the response or actions taken in these steps are satisfactory, contact the EthicsPoint hotline (855) 351-5664 or online at www.bordendairy.ethicspoint.com.

You are encouraged to submit in writing your position with respect to the problem(s) and desired outcome. All parties concerned will be contacted, Company policy will be reviewed, and an equitable solution to the problem, as determined by the Company, will be rendered. This determination of employment is final and binding to all.

Solicitation, Distribution, and Use of Company Bulletin Boards

The solicitation of support by or for various organizations is prohibited on working time. Although many of these groups are worthy organizations, we believe that the following rules will best protect the private lives of our employees and the Company's desire to obtain the full benefit of your productivity.

To maintain and promote efficient operations, the Company has established rules, which govern both solicitation and the distribution of written or printed material. Failure to obey these rules may result in corrective action, up to and including termination of employment. Any employee who is in doubt concerning the application of these rules should consult with his/her supervisor/manager or the local Human Resources representative.

- No employee shall solicit or promote support for any cause or organization during his/her working time or during the working time of the employee or employees to whom such solicitation activity is directed.
- No employee shall distribute or circulate any written or printed literature during his/her working time or during the working time of the employee or employees to whom such activity is directed, or in work areas at any time.
- A person who is not an employee of the Company may not come on the premises at any time to solicit for any cause or to distribute material of any kind for any purpose.
- Working time is the time an employee is expected to be performing job duties and does not include mealtimes or break periods.



These rules are established for the purpose of preventing interference with work duties and apply to employees engaged in the solicitation or distribution as well as to employees being solicited or receiving distributions. These rules do not apply to activities that are part of an employee's regular job duties or that are necessary to carry out such job duties. Also, these rules do not apply to Company-authorized charitable solicitations.

Media Contact / Communication Policy

All contact with major or local media on behalf of the Company is to be made solely by, or with the concurrence of, headquarters Human Resources or General Counsel. Any employee who receives an inquiry from any member of the media seeking a comment on behalf of the Company should refer the inquiry to their local site Human Resources representative to be escalated to the appropriate resources.

WORKPLACE RULES AND POLICIES

EthicsPoint Hotline

If any Company employee observes or suspects illegal or non-compliant conduct including but not limited to discrimination, harassment, bullying, retaliation, acts of violence or threats of violence, they are strongly encouraged to report such observations or suspicions to management or their local site Human Resources representative. Company employees can report, anonymously or otherwise, via the EthicsPoint hotline at (855) 351-5664 or online at www.bordendairy.ethicspoint.com. Reports are treated as confidential to the extent consistent with the Company's duty to conduct an appropriate investigation. All matters will be investigated and may result in appropriate disciplinary action up to and including termination of employment if necessary.

Retaliation in any form against a person who exercises his or her right to make a good faith complaint or report to the EthicsPoint Hotline, or against a witness who participates in an investigation, is strictly prohibited, and will itself be cause for appropriate disciplinary action, up to and including termination of employment. Any violation of this policy, including inappropriate actions or failure to act, may result in corrective action, up to and including termination of employment.

The Company relies on and expects prompt, truthful and accurate reporting of all incidents of prohibited conduct. Because of the sensitive nature of such allegations, investigations to gather all of the facts will be conducted with care and will remain, to the extent possible, confidential. All complaints will be investigated promptly. In investigating complaints, the Company will attempt to maintain confidentiality without impeding the investigation. Failure to participate fully and truthfully in the investigation can result in disciplinary action, up to and including termination of employment. Prompt, effective remedial action will be taken where appropriate, based on the results of the investigation.

Equal Employment Opportunity

The Company provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, status as a disabled veteran or other protected veteran, or any other characteristic protected under applicable federal, state, or local law, regulation, or ordinance, in all phases of the employment process and in compliance with applicable federal, state, and local laws and regulations in every location in which the Company has facilities. This continuing policy of non-discrimination applies to all terms and conditions of employment including but not limited to: recruitment or recruitment advertising, hiring, placement, promotions, demotions, transfers, layoffs, furloughs, recalls, terminations, leaves of absence, rates of pay or other forms of compensation, selection for training, internships, and apprenticeships.

Employees and applicants of the Company will not be subjected to any form of harassment or discrimination for exercising rights protected by, or because of their participation in an investigation or compliance review related to,



the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation. Improper interference with the ability of Company employees to perform their job duties may result in discipline up to and including discharge.

The Company expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above, including any characteristic protected under applicable federal, state, or local law, regulation, or ordinance. Improper interference with the ability of other employees to perform their expected job duties is not tolerated.

Retaliation

The Company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to:

- shunning and avoiding an individual who reports harassment, discrimination, or retaliation.
- express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination, or retaliation.
- denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

Reporting Discrimination

If any Company employee believes they have been discriminated against as described above, see the EthicsPoint hotline section in this Employee Handbook.

Affirmative Action Plans (AAP)

The Company maintains Affirmative Action Plans (AAPs) to aid in the implementation of our equal employment opportunity policy for individuals with disabilities and protected veterans. Employees or applicants who wish to review the full narrative portion of the Company's affirmative action program for individuals with disabilities or protected veterans may schedule an appointment to do so by contacting the site Human Resources representative during normal business hours.

Employees and Applicants with Disabilities

It is Company policy to comply with the Americans with Disabilities Act. The Company will not discriminate against any qualified employee or applicant because of a physical or mental disability.

Reasonable Accommodation

The Company will reasonably accommodate employees or applicants with disabilities who are otherwise qualified to perform the essential functions of a job safely unless it would create an undue hardship. An employee who believes they require a reasonable accommodation because of a protected disability should notify the local site Human Resources representative of the issue so that an interactive dialogue can begin about a proposed accommodation.

Any employee whose religious beliefs or practices conflict with his or her job schedule, with the Company's policy or practice on dress and appearance, or with other aspects of employment, and who seeks a religious accommodation must notify the local site Human Resources representative of the conflict and the employee's proposed accommodation. The Company respects the religious beliefs and practices of all its employees. The Company will make every attempt to provide reasonable accommodation for such beliefs and practices.



Each request for a reasonable accommodation due to a protected disability or because of a religious belief will be evaluated on a case-by-case basis. No employee will be retaliated against because he or she requests a reasonable accommodation due to a religious belief or because of a protected disability.

Confidentiality

Applicants and employees are assured that all information regarding a disability will be kept completely confidential except supervisors and managers may be informed regarding restrictions on work or duties and accommodations that have been made; if the condition requires emergency treatment, first aid and safety employees may be informed; and government officials investigating compliance with federal laws may be informed. All employees with responsibilities requiring knowledge of an employee's disability are instructed to treat the employee's disability confidentially.

Harassment Free Workplace

The Company is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes teamwork and mutual respect and prohibits discriminatory practices, including harassment and bullying. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, bullying, and harassment.

It is the policy of the Company to ensure a harassment free environment without discrimination or bullying for all employees, applicants, customers, suppliers, visitors, or anyone with whom we may come into contact with while conducting business on behalf of the Company. This includes, without limitation, harassment, bullying, and discrimination based on gender, race, color, national or ethnic origin, marital status, sexual orientation, gender identity, gender expression, religion, age, physical or mental disability, or any other condition or status protected by federal, state, or local law, regulation, or ordinance. The Company prohibits and will not tolerate any such discrimination, harassment, or bullying. In addition, there will be no adverse action or retaliation against any individual for filing any legitimate complaint and/or testifying, assisting, or participating in any investigation, proceeding, or hearing.

While it is not possible to list all those additional circumstances that may constitute harassment, the following are some examples of conduct that, if unwelcome, may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwanted sexual advances, whether they involve physical touching or not.
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess.
- Displaying sexually suggestive objects, pictures, or cartoons.
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments.
- Inquiries into one's sexual experiences.
- Discussion of one's sexual activities.

Verbal, visual, physical, or sexual conduct which may be viewed by some employees as good-natured fun may be viewed by other employees as extremely distasteful and offensive and will not be tolerated at the Company.



Bully Free Workplace

The Company defines bullying as “repeated inappropriate behavior,” either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant. As in sexual harassment, it is the effect of the behavior upon the individual which is important.

Examples of bullying include, but are not limited to:

- Verbal bullying such as slandering, ridiculing, or maligning a person or his/her family.
- Persistent name calling, which is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.
- Physical bullying such as pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, or damage to a person’s work area or property.
- Gesture bullying such as non-verbal threatening gestures or glances, which can convey threatening messages.
- Exclusion such as socially or physically excluding or disregarding a person in work-related activities.

Every employee is responsible for behaving in a professional and courteous manner that promotes a professional and harassment-free work environment. Any employee who behaves in a manner that is inconsistent with these policies will be subject to discipline, up to and including immediate termination of employment.

Reporting Harassment, Bullying, or Discrimination

If any Company employee believes they have been harassed or bullied as described above, see the EthicsPoint hotline section in this this Employee Handbook.

Conflicts of Interest

Employees are expected to avoid situations that create an actual, potential, or apparent conflict between the employee's personal interests and the interests of the Company. A conflict of interest exists when an employee's personal interests or relationships would reasonably be expected to interfere with the employee’s ability to perform his or her job duties effectively and objectively. Employees who are unsure whether a certain transaction, activity, or relationship constitutes a conflict of interest should discuss it with their supervisor or a member of management. Any exceptions to this guideline must be approved in writing by the corporate Human Resources department.

Some examples of conflicts to be avoided by all employees include but are not limited to the following:

- Accepting extravagant personal gifts, meals, refreshments, or modest entertainment from existing or potential competitors, customers, or suppliers greater than \$75 in value.
- Accepting item(s) or gift(s) offered with the expectation of favorable treatment in return.
- Offering item(s), gift(s), entertainment, gratuities, money, loans, product(s), or similar monetary advantages to existing or potential competitors, customers, or suppliers with the expectation of favorable treatment in return.
- Dating or otherwise engaging in behavior associated with a romantic relationship with potential competitors, customers, or suppliers.
- Working for an existing or potential competitor, customer, or vendor while employed by the Company.
- Engaging in self-employment in competition with the Company.



- Using Confidential Information for any reason unrelated to your job at the Company.
- Having a direct or indirect financial interest in or relationship with an existing or potential competitor, customer, or supplier.
- Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company.
- Committing the Company to give its financial or other support to any outside activity or organization without appropriate written authorization.

Outside Employment

Employees are expected to devote the necessary time and energy to fulfill their job duties with the Company. The Company recognizes that for some of our employees, additional outside employment is reasonable. However, employees may not participate in employment outside of the Company when such employment:

- Prevents the employee from fully and effectively performing work for which he/she is employed to perform by the Company, including overtime assignments as needed.
- Interferes with employee efficiency, flexibility, safety on the job, or violates any regulatory requirements such as DOT hours of service.
- Creates a conflict of interest or is incompatible with the employee's position within the Company. For example, employment with a competitor or organizations that are doing business or seeking to do business with the Company may present a conflict, particularly if the employee holds a position that exposes him/her to the Company's confidential information.)
- Violates the law or the Company's policies.

Any questions on this subject should be directed to your supervisor/manager or your local site Human Resources representative.

Relationships and Employment of Relatives

While the Company has no desire to interfere with the private lives of its employees, the Company reserves the right to take whatever action is appropriate, at its discretion, to protect its interests where such conduct poses a negative impact on the work environment. The following guidelines are in effect to preclude potential problems such as appearance of bias, favoritism, conflict of interests, interference with productivity of co-workers, and charges of sexual harassment.

The Company strictly prohibits supervisors, managers, or any other person in a position of authority from dating or engaging in romantic and sexual relationships with any employee who reports directly or indirectly to them or whose employment could be impacted in any way by the relationship. The terms "dating" and "romantic relationships" include, but are not limited to, the following: casual dating, serious dating, casual sexual involvement where the parties have no intention of carrying on a long-term relationship, cohabitation, or any other conduct or behavior normally associated with sexual relationships. The restriction on romantic relationships is regardless of the sexual orientation of the employees involved. Any employee currently involved in a romantic relationship with another employee must immediately report the relationship to the Human Resources department. Any deemed instance of fraternization may require at least one party in the relationship to resign his/her employment with the Company.

The employment of relatives or family members working in a direct/indirect supervisory/subordinate relationship in the same line of authority or in any reporting relationship where one family member holds a real or perceived position of influence must have prior approval from the Plant General Manager as well as the Chief Human Resources Officer. The Company reserves the right to take any appropriate action necessary to comply with this policy, including but not limited to, transferring, or terminating an employee if a violation of this policy occurs.



Office and Work Area

It is the policy of the Company to present a professional image in all our offices and facilities. Both public and private work areas should be clear of clutter and dirt, tastefully decorated, and safely maintained to provide a professional, business-like environment for employees, customers, vendors, and visitors. While personal decorations are allowed to express individuality in the workplace, employees should exercise good judgment that such décor maintains a business-like environment.

Workplace Violence

Consistent with this policy, acts of physical violence or threats, including intimidation, harassment, and/or coercion which involve or affect Company employees, or which occur on Company property will not be tolerated. Specific examples of conduct that may be considered "threats or acts of violence" prohibited under this policy include, but are not limited to, the following:

- Hitting or pushing an individual or otherwise striking an individual with any object held or thrown.
- Threatening to harm an individual or his/her family, friends, associates, or their property.
- Intentional destruction or threat of destruction of property owned, operated, or controlled by the Company, its vendors, or customers.
- Making harassing or threatening telephone calls or gestures or sending harassing or threatening letters or other forms of written or electronic communications.
- Intimidating or attempting to coerce an employee to do wrongful acts, as defined by applicable law, administrative rule, policy, or work rule.
- The repeated following of another person, also known as "stalking," and making of a credible threat with intent to place the other person in reasonable fear for his or her safety.
- Suggesting or otherwise intimating that an act to injure persons or property is "appropriate," without regard to the location where such suggestion or intimation occurs.
- Unauthorized possession or use of firearms, weapons, or any other dangerous device(s) on Company property.

Violation of this policy by any individual may lead to legal action, as appropriate, and violation of this policy by a Company employee may lead to disciplinary action up to and including immediate termination of employment.

Weapons-Free Workplace

The Company prohibits the possession of weapons on its property at all times (except where permitted by law), including our parking lots or company vehicles. Additionally, while on duty or while attending functions related to the Company, employees may not carry a weapon of any type. Weapons include, but are not limited to, handguns, rifles, automatic weapons, and knives that can be used as weapons (excluding pocketknives, utility knives, and other instruments that are used to open packages, cut string, and for other miscellaneous tasks), martial arts paraphernalia, stun guns, and tear gas.

The Company reserves the right to inspect all belongings of employees on its premises, including packages, briefcases, purses and handbags, gym bags, and personal vehicles on Company property. In addition, the Company may inspect the contents of lockers, storage areas, file cabinets, desks, and workstations at any time and may remove all Company property and other items that are in violation of Company rules and policies. If at any time the Company has a reasonable suspicion that a weapon has been carried, maintained, or stored in violation of this policy, the Company reserves the right to conduct a reasonable search of the employee's person and property. This prohibition also applies to any employee who is licensed to carry a firearm or weapon. Weapons may include but are not limited to any firearm, whether loaded or unloaded, knife, bludgeon, electronic stunning device, or explosive device. Any employee who is uncertain whether an instrument or device is prohibited under this policy is obligated



to request clarification to ensure he or she is not in violation of this policy. Any employee violating this policy is subject to discipline up to and including dismissal for the first offense. The Company does not and will not condone any form of retaliation against any employee for making a good faith report of weapons possession under this policy.

Human Rights Policy

The Company is committed to the highest standards of business and ethical behavior including compliance with all applicable laws and regulations, as well as Company policies, practices, and procedures. The Company respects internationally recognized Human Rights as established in the Universal Declaration on Human Rights and the International Labor Organization's Core Conventions.

In line with the UN Guiding Principles on Business and Human Rights, The Company recognizes the corporate responsibility to respect these principles and commit to 'know and show' this through on-going human rights due diligence. Furthermore, our efforts include ongoing robust engagement with our business and major supply chain partners to mitigate potential human rights impact beyond our direct control. Our support of internationally recognized Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

The objective of the Company's documented policies (as set out in the Company's Code of Conduct for Employees and the Company's Code of Conduct for Suppliers) is to provide an overview of expectations for employees and business partners. In addition, the Human Rights policy exists to:

- Inform employees, business partners and customers of the Company's commitment to human rights.
- Establish the Company's commitment to 'know and show' its respect for human rights through on-going human rights due diligence.
- Maintain the Company's high ethical standards.

The Company's Human Rights Policy applies to all Company employees nationwide, anyone doing business for or with the Company. This applies to all locations where the Company conducts business and to all Company-sponsored events.

Guidelines

The Company conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognized Human Rights. All employment with the Company is voluntary. We do not use child or forced labor in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing a minimum age for employment, to support the effective abolition of child labor. The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status. Diversity is embraced at the Company. We recognize that a diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage. We believe everyone should be treated with respect regardless of their background. We are committed to the elimination of discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, marital status or any other protected class.

Our Supply Chain Management System includes the requirement for all suppliers, vendors, contractors, consultants and agents to adhere to the Company's Labor standards and Code of Conduct policies. In addition to this, the Company is committed to the following principles:

- The Company respects all human rights.



- The Company commits to conducting on-going human rights due diligence to assess and mitigate potential human rights infringements. The Company expects those with whom it does business to respect all human rights.

The Human Rights policy is owned and maintained by the Company's Human Resources function. Human Resources is responsible for the creation, administration, updating and communication of the policy.

Compliance

Employees and suppliers are expected to comply with this and all applicable Company policies. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities, where we have sound reason to believe that our partner organizations infringe Human Rights we reserve the right to cease those relationships as warranted. Specific to this policy, employees and suppliers are expected to:

- Never infringe on human rights.
- Be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners and report any situation in which a human rights infringement is suspected.

Child Labor Policy

The Company does not tolerate the labor exploitation of children and uses the International Labour Organization (ILO) and the UN Convention on the Rights of the Child to guide our Child Labor Policy. When it comes to legal aspects of our Child Labor Policy, the Company:

- Follows the stricter law if more than one laws apply (e.g. state and federal, local, and international), and
- Requires suppliers, partners, and vendors to follow the stricter applicable laws and recognize children's rights. They must also require their own suppliers, subcontractors, and stakeholders to do the same.

The Company does not employ minors under the age of 18.

In this policy, we refer to "children" as people who are younger than [18] years of age. "Young children" are people younger than [14]. "Child labor" refers to work that deprives children of their childhood and affects their schooling, their potential, and their dignity.

Company Suppliers

The Company will not tolerate the use of unlawful child labor or forced labor in the manufacturing of products it sells and will not accept products or services from suppliers, subcontractors or business partners (collectively referred to as "Suppliers") that employ or utilize child labor or forced labor in any manner.

Parental Employment with a Family-Owned Business or Farm

The Company might occasionally do business with family-owned businesses or family-owned farms. Those businesses or farms are usually allowed to employ the owner's young children as long as the work isn't too hazardous (e.g. mining, manufacturing).

To ensure compliance with this policy and help eliminate child labor, the Company is committed to:

- Working with governments and other organizations to end child labor.
- Educating our staff on youth work laws and show them how to report child labor if they see or suspect it.
- Requiring hiring managers and Human Resources to avoid hiring minors under the legal age for working.
- Keeping and validating documentation verifying our employees' age after they're hired.
- Communicating our no child labor policy to organizations we're connected with and ensure our contracts have the right stipulations.



- Auditing suppliers and partners periodically to ensure they aren't involved in child labor, possibly with unannounced onsite visits too. We'll require them to provide us with an updated list of all their business locations at all times. If we discover hidden business sites that employ children, we'll dissolve our contract immediately.
- Demanding and monitoring an elimination plan in cases where suppliers discover child labor in their business. We'll also work together with the stakeholder to create plans to support children, keeping their best interests in mind, and make efforts to involve them and their families in the process.
- Employing or consulting with experts on topics like child labor, health and safety standards or corporate social responsibility.

Code of Conduct

At Borden, we make an absolute commitment to our customers and employees to conduct business ethically and in full compliance with our Code of Conduct, Values, policies and applicable laws. The Company's Code of Conduct is a roadmap to acting ethically and with integrity while performing work for the Company.

The Company's commitment to deliver sustained growth, acting with responsibility and building trust is built on the values found in the Borden Difference:

- Servants Heart
- Teamwork
- Creative Problem Solving
- Passion to Win
- Fun

The Company can uphold our high standards of ethical business conduct only with the commitment and cooperation of every employee. You are personally responsible for understanding and complying with our Code of Conduct and reporting any violations, such as accounting/auditing irregularities; fraud, theft, bribery or other corrupt business practices; antitrust or insider trading violations; environment, safety or product quality issues; illegal discrimination or harassment; and conflicts of interest.

You are encouraged to report conduct that may violate our Code, our policies or the law to your supervisor, next level manager, Human Resources representative or to the EthicsPoint Hotline as defined in this handbook.

Confidential Information

Each employee is responsible for safeguarding confidential information of the Company, its subsidiaries, and others against unauthorized disclosure. The obligation to safeguard confidential information applies both during and after employment with the Company. "Confidential information" as that term is used in this policy includes but is not limited to customer and client data, business techniques, non-public financial data, sales and marketing activity and plans, trade secrets, and proprietary information that is not reasonably accessible to the public or other co-workers and maintained as confidential by the Company. Additionally, employees who are given special custody of employment records to use in the performance of their job duties are required to safeguard the confidentiality of such information. Employees should always be alert to inadvertent disclosures made during social conversations or normal business discussions with suppliers, customers, competitors, and others. Employees should be careful not to discuss confidential information or other confidential Company business in public places. Employees should also be cautious in handling confidential information in the workplace and should not leave or discuss such information where it could be seen or overheard by, or otherwise accessible to, other employees who do not have a need to know the information. Confidential information may be disclosed, if required by legal process such as subpoena or court order, only after authorization by or at the direct request of the Company's General Counsel or headquarters.



Human Resources department. Employees who are unsure about the confidential, proprietary, or sensitive nature of specific information should ask their immediate supervisor, manager, or local Human Resources representative for clarification. Employees will be subject to appropriate disciplinary action, up to and including termination, for knowingly or negligently revealing confidential information.

EMPLOYEE HEALTH AND SAFETY

Safety Policies

It is the Company's desire and intent to provide a safe working environment for all our employees. To accomplish this, we enforce our established safety policies and procedures. It is the responsibility of every employee to practice safe working habits and abide by all safety policies. If you see an unsafe actions or conditions in the workplace, report it to your supervisor immediately so it can be addressed as soon as possible. Any near miss or minor accident could be an indication of unsafe conditions or practices that could result in a serious injury. Therefore, communicate all near misses, injuries, incidents, accidents, or unsafe conditions to your supervisor or manager immediately.

The Company believes that safety is a shared responsibility that requires a dedicated commitment from every employee. You are responsible for safety. By observing the proper safety precautions, the Company and its employees can prevent most injuries and accidents. Employees must comply with safe working practices and exercise caution in all work activities.

General Safety Rules

1. Practical jokes or "horseplay" will not be tolerated.
2. Always wear required personal protective equipment where safe work practices and department rules require them.
3. Wear appropriate work clothing as specified by management. Wearing gloves, rings, and loose clothing around moving machinery can be dangerous.
4. Tennis shoes are not permitted.
5. Keep aisles and exits clear and work areas in a clean, orderly condition.
6. The safe way to go up and down stairs is to take one step at a time. Running is not permitted.
7. Do not block areas surrounding a fire alarm station, fire door, extinguisher, or hose.
8. Tools, materials, and equipment should be used and stored in a manner that will not cause a hazardous condition.
9. Tools must be kept in good condition and used ONLY for the purpose intended and carried in a safe manner.
10. Remove keys and set parking brake upon exiting Company vehicles.
11. Know the procedure for sounding the alarm and for evacuating your workstation in the event of a fire or other type of emergency.
12. Only authorized, trained employees are allowed to operate powered industrial trucks. The trucks are to be operated in safe manner at all times and no faster than 5 mph.
13. Milk crates are NEVER to be used as step stools or ladders.
14. Heed all warning signs and follow all written instructions.
15. Report all unsafe behavior, conditions, tools and/or equipment to your supervisor immediately.
16. Any action, neglect or carelessness, which endangers or injures a fellow employee, will not be tolerated.
17. Read and observe the specific safety rules and practices for your department.

Violations of the below intolerable offenses may result in automatic termination.

Manufacturing Including but not Limited to:

1. Failure to follow LOTO procedures.
2. Failure to use fall protection when required.
3. Bypassing, altering, or removing machine safeguards.



4. Failure to use proper PPE when handling chemicals per Safety Data Sheet
5. Unauthorized Confined Space Entry.
6. Failure to report a work-related injury or accident.
7. Filing a false report of an injury or accident.

Distribution Including but not limited to:

1. Leaving the scene of a vehicle accident.
2. Failure to report a citation, moving violation, DUI, license suspension or revocation.
3. Failure to report an accident or injury.
4. Falsification of safety records or documents.
5. Operating a CMV with invalid CDL or Medical Card.
6. Filing a false report of an injury or accident.

This list is not intended to be a complete listing of all Company safety standards. Employees are expected to use their best judgment about emergency situations and to react in a manner, which always gives priority to the safety and well-being of themselves and their fellow employees.

If you have any safety-related questions or concerns, please bring them to the attention of your supervisor or manager as soon as possible. If you believe you or another person are in danger of imminent harm call 911 immediately.

If your job responsibilities include the operation of mechanical or other equipment you should comply with all of the manufacturer's safety recommendations for that equipment. It is your responsibility to inspect the equipment for any safety hazards before operating it. If you find any equipment unsafe to operate, report it to your supervisor or manager immediately. Do not knowingly operate any equipment that is unsafe. Employees are prohibited from removing or tampering with safety guards or other safety devices. Employees are also prohibited from utilizing any equipment that has had safety guards or other safety devices removed or disabled. If you have any questions regarding the safe and proper use of equipment, you should promptly notify your immediate supervisor or a member of management.

Work Related Injury

Any employee who sustains an injury while at work, no matter how minor the injury might seem, must report the injury to a supervisor, manager, Safety Manager, or Human Resources immediately. This procedure ensures that the Company can assist the employee in obtaining appropriate medical treatment. Failure to follow this procedure could jeopardize the employee's right to benefits in connection with the injury. If you have any questions regarding work related injuries, please see your local site Human Resources representative.

When an employee of the Company suffers a work-related injury and as such, has restrictions placed on him or her, the Company is committed to returning that employee to work as soon as possible. This may be accomplished by temporarily modifying the duties of the current job or temporarily placing the employee in another job, which is available within the restrictions.

Smoking, Vaping and Tobacco Use

The Company maintains a smoke-free workplace, except in designated areas. No employee/visitor of the Company is permitted to use tobacco in any form through the use of tobacco products (pipes, cigars, cigarettes, chewing tobacco, smokeless tobacco, etc.) or vaping with e-cigarettes or other devices in the Company's workplace, including but not limited to vehicles and customer properties. Employees who intend to use tobacco or vaping products may do so in designated areas only. Individuals violating this policy will be subject to disciplinary action up to and including termination of employment.



Substance and Alcohol Abuse

The Company is committed to maintaining a safe and healthy workplace and has such adopted a zero-tolerance substance and alcohol abuse policy. We intend to comply with all applicable federal, state, and local laws and regulations about the testing of and deterrence of drug and/or alcohol abuse in the workplace. We will not tolerate the illegal use of controlled substances or alcohol and will take any steps we deem necessary to ensure the safety and well-being of our employees, our customers, and the public.

Drug and alcohol testing as required under this policy will apply to all drivers governed under the Department of Transportation Federal Regulations and all other employees of the Company. Subject to all applicable state and federal laws, the actions that the Company will take to detect violations of this policy may include but are not necessarily limited to:

- Random Testing - As authorized or required by federal or state law.
- Pre-Employment Testing - As required by the Company for all prospective employees who receive a conditional offer of employment.
- Post-Accident Testing.
- Reasonable Suspicion Testing - Upon reasonable suspicion that the employee is under the influence of alcohol or drugs that could affect or has adversely affected the employee's job performance).
- Return-to-Work Testing.
- Unannounced General Searches.
- Employee Vehicle Search While on Premises.

Compliance with this policy is a condition of employment. Employees who test positive or who refuse to submit to substance abuse screening may be subject disciplinary action up to and including termination of employment. Notwithstanding any provision herein, this policy will be enforced at all times in accordance with applicable state and local law. Any employee violating this policy is subject to discipline, up to and including termination, for the first offense.

The Company is committed to encouraging optimum productivity and protecting its employees from accident, injury, and property damage, including incidents that may result because an individual's faculties are impaired from the use of alcohol, drugs, or any controlled substance including marijuana, legal or illegal. Therefore, in addition to the above:

- All employees are prohibited from having any alcohol, marijuana, illegal drugs, or legal drugs which are unlawfully obtained or used in their system outside their prescription, when reporting for work, during working hours, while conducting Company business or on Company property (defined as: buildings, facilities, parking areas, and/or vehicles owned, operated, or leased by the Company, and/or all places where the Company conducts business).
- The use, sale, transfer, possession, manufacture, or dispensing of marijuana, any illegal drugs, or alcoholic beverages on Company property while conducting Company business or activities is strictly prohibited.
- The use, distribution or possession of medical marijuana or prescription drugs which have been illegally obtained, or are intended for another person, or are used in a manner, combination, or quantity other than as prescribed by a licensed medical/dental practitioner, or the abuse or misuse of over-the-counter drugs is strictly prohibited.

Any employee who is taking medication that may affect his/her ability to work safely must notify their local site Human Resources representative prior to beginning his/her next shift. Any employee who fails to make such a report may be subject to a drug and/or alcohol test, consistent with applicable law, and/or appropriate disciplinary action.



Good Manufacturing Practices (GMPs)

Clean and organized work and break areas reduce the chances for accidents. Maintaining a clean workplace is also a courtesy to others who work nearby. You are responsible for keeping your work area neat and clean, as well as for cleaning up after yourself in break/meeting areas. To ensure the highest level of cleanliness, food consumption is restricted to designated break areas only. Please see your supervisor, manager, or site safety or quality leader for a complete list of good manufacturing practices and/or department guidelines on cleanliness.

Personal Protective Equipment (PPE)

Use of proper protective equipment is a safety and job requirement for all manufacturing and distribution areas. All personal protective clothing and equipment will be of safe design and construction for the work to be performed and will be maintained in sanitary and reliable condition. The protective clothing and equipment below will be provided by the Company as per our standards and will be available for use as appropriate.

- Uniforms
- Gloves
- Proper footwear
- Masks
- Safety glasses (where appropriate)
- Bump caps
- Ear plugs

If you have questions as to the required PPE for your work area, please ask your supervisor, manager, or site safety leader. Failure to comply with Company policy on the use of Personal Protective Equipment will lead to disciplinary action up to and including termination.

Proper Footwear

It is the policy of the Company to promote a safe working environment and protect employees from foot/ankle injuries as well as slips, trips and falls. As a condition of employment all regular full time, part time, temporary, and contract employees are required to wear Company-approved safety shoes when working in safety sensitive areas or performing tasks that involve the possibility of foot injuries, ankle injuries, slips, trips, or falls. All safety shoes must meet or exceed ANSI Standard Z41-1999. Your supervisor will discuss any specific safety shoe requirements for your work area with you.

Building Security/Crisis Management/Emergency Preparedness

At times, emergencies (such as severe weather, fires, power failures, earthquakes, etc.) can disrupt Company operations. In extreme cases, these circumstances may require the closing of a work facility. In the event that such an emergency occurs, local radio and/or television stations may be asked to broadcast notification of the closing. The Company's Emergency Action Plan (EAP) outlines specific local procedures in case of such emergencies. Please consult your supervisor, manager, or local site Human Resources representative regarding these events.



GENERAL PRACTICES

Corrective Action

It is the goal of the Company to provide a productive work environment for employees, to encourage positive working relationships and to take fair, equitable and positive steps to resolve performance and conduct concerns. Any disciplinary or corrective action taken is based on the severity and type of the work-related problem. Management is responsible for evaluating each case based on its facts; any action taken will be based on the circumstances of the work-related problem.

Management retains the right discretion to discipline or terminate employees based on the facts of each case. An employee may be suspended with or without pay, pending investigation, if the seriousness of the problem warrants and time is needed to effectively investigate the matter.

General Conduct Policy

Generally, the Company expects employees to exercise common sense and good judgment. Conduct that is dishonest, insubordinate, immoral, or illegal will not be tolerated. The following rules of conduct are not all inclusive but should give you an idea of what the Company expects. Violations of these and other established work or safety rules may result in disciplinary action, up to and including termination depending on the circumstances.

- Employees must always be respectful and courteous to others.
- Insubordination and disruptive behavior are prohibited.
- At times, there will be differences of opinion or personality conflicts. We expect all employees and managers to try to resolve these differences in a professional and courteous manner.
- Discriminating against and/or engaging in harassment or bullying of any employee, applicant, contractor, customer, vendor, or member of the public is prohibited.
- Intentional interference with or obstructing other employees in the performance of their duties is not allowed.
- Creating or contributing to unsanitary conditions on your employer's customer locations vehicles or premises is prohibited.
- Absolute requirement to report injuries immediately. Failure to report an injury or an accident in a timely manner will result in disciplinary action up to and including termination.
- Any conduct prejudicing the integrity of the product and manufacturing rules, regulations, and practices is not allowed.
- Writing on, defacing, or removing notices, signs or writing in any form from bulletin boards or any other surface on Company property at any time without specified authorization from management is prohibited.
- Falsification of any Company records, including employment applications, payroll records, reports regarding absences, expenses, claims regarding workplace injuries/accidents, or time records (including clocking in or out for another employee) is not allowed.
- Negligent or improper use of Company property or equipment is prohibited including but not limited to misappropriation of Company funds, property, or assets.
- Unauthorized use of recording devices, including but not limited to cell phones, cameras, or tape recorders to photograph or record activity of any kind in Company working areas is prohibited.
- Sleeping on Company premises during work hours is prohibited.



- Gambling, conducting a lottery or any other game of chance on Company premises or during working hours is not allowed.
- Immoral and/or indecent conduct is not allowed.
- Failure to report an accident or damage to machinery, vehicles or other property belonging to the employer or another employee is prohibited.
- Willful negligence or gross negligence in the performance of your duties or functions is not allowed.
- Using another person's badge or permitting another person to use your badge to enter the Company premises is prohibited.
- Excessive absenteeism is unacceptable.
- Horseplay and practical jokes may lead to accidents and will not be tolerated.

This list is not inclusive. Management, at its sole discretion, reserves the right to determine when an employee's behavior is unacceptable, and when and what disciplinary action is necessary under a given circumstance. Employee conduct deemed to be unacceptable behavior may result in disciplinary action up to and including termination of employment. The type of disciplinary action that may be imposed may vary depending on the facts and circumstances surrounding each case. Employees may be subject to discipline for poor performance in violation of other policies and procedures. Management may skip certain disciplinary steps or repeat certain disciplinary steps depending on the particular facts of each situation. Management retains the right and absolute discretion to discipline or terminate employees based on the facts of each case.

Company Property and Company Premises

Employees must exercise care in the use of the Company's property. Negligent care or use, unauthorized removal, or personal use of Company property is prohibited. Company property issued to you, including but not limited to computer equipment, software, manuals, and Confidential Information, or any other Company owned equipment, must be returned if your employment with the Company is voluntarily or involuntarily terminated. The cost of any unreturned Company property may be deducted from your final paycheck, consistent with applicable state law.

As permitted by law, searches on Company premises may be conducted at any time, including personal searches of employees and all other persons entering and leaving Company premises in accordance with applicable state law. "Company Premises" include all buildings, facilities (including offices, locker rooms, break rooms, etc.), parking areas / maintenance garages (including any vehicle located therein), vehicles owned, operated, or leased by the Company and/or all places where the Company conducts business.

Additionally, the Company premises are always subject to video and audio monitoring and recording, in accordance with applicable state law. All employees expressly consent to such monitoring and recording as a condition of their employment by the Company.

Personal Property

The Company strives to provide a safe working environment for its employees. Employees are responsible for safeguarding personal belongings, regardless of whether a locker is provided or not. The Company is not responsible or liable for the loss, theft, or damage to any personal belongings on Company property, regardless of the cause of the loss, theft, or damage. Employees are encouraged to take proper care in securing the safety of personal belongings.



Personal Communication Devices

The Company reserves the right to restrict or prohibit personal electronic device use on the Company premises as it deems appropriate. Unless authorized in advance by a department manager, cell phones and other personal electronic devices are prohibited in work areas, including but not limited to, production, distribution, and warehousing facilities, coolers, and loading/unloading areas, maintenance and mechanic garages, and milk receiving bays.

All personal communication devices that are not specifically authorized for use by a department manager must be left at home or stored in your locker or vehicle during working time. The Company is not responsible for loss, damage to, or theft of any such items.

This policy applies to all electronic or personal communication devices that can send and receiving phone calls or text messages, accessing the internet, or are capable of recording video and/or audio.

We recognize the importance of having personal communication capability with others. Use of personal communication devices is permitted only during breaks or mealtimes in approved areas such as: break rooms, locker rooms, personal vehicle, or office areas.

Employees must adhere to all federal, state, or local rules and regulations regarding the use of cell phones while driving. Accordingly, employees must not use cell phones if such conduct is prohibited by law, regulation, or other ordinance. The Company strongly discourages the use of a cell phone while driving. Reviewing, editing, or sending text messages or email messages on a cell phone while driving a Company vehicle is expressly prohibited. Employees should not use hand-held cell phones for business or personal reasons or while driving. Should an employee need to make a business call while driving a Company vehicle, he or she should locate a lawfully designated area to park and make the call.

Use of Communication Services and Equipment

In order to remain competitive, best serve our customers, and provide our employees with the proper tools to do their jobs, the Company makes available to our workforce, access to one or more forms of communications services and equipment including, but not limited to, computers, mail, electronic mail, courier services, facsimiles, telephone systems, voicemail systems, computer networks and files, on-line services, computer files, intranet, Internet, video equipment, pagers, and bulletin boards.

Cell phones are not provided by the Company. The Company may, at its sole discretion, provide a cell phone stipend if the use of a cell phone is determined to be necessary by the Company to perform a job.

All Company communications services and equipment, including the messages transmitted or stored by them, are the sole property of the Company. The Company may access and monitor employee communications and files as it considers appropriate. All employees expressly consent to such monitoring and recording as a condition of their employment by the Company and as a condition of using the Company's communication services and equipment. Employees have no reasonable expectation of privacy with respect to these communication services.

The Company expects employees to use all communication resources in a professional, ethical, and lawful manner, and for business purposes only. Examples of appropriate usage include communicating with fellow employees, customers, prospects, and suppliers regarding business matters, researching topics that are relevant to your specific job requirements, and conducting other business activities. Improper use of Company communication services and equipment may result in disciplinary action up to and including termination of employment.

Employees are prohibited from using the Company's communication services and equipment for any personal purpose, which would include any purpose that is unprofessional, unethical, illegal, or contrary to the Company's policies or business interests such as, but not limited to, the following:



- Using Company communication services and equipment to access, transmit, retrieve, or store any communication that is: discriminatory or harassing; derogatory to any individual or group; obscene, sexually explicit or pornographic; defamatory or threatening; in violation of any license governing the use of software; considered a chain email; or otherwise, illegal or contrary to the Company's policies or business interests.
- Illegally downloading copyright protected software from the Internet. If an employee violates this policy by downloading copyrighted software, he or she shall assume full responsibility for his or her actions and indemnify the Company accordingly.
- Downloading or using software or e-mail programs other than those specifically authorized by the Company.
- Monitoring or intercepting the files or electronic communications of other employees or third parties.
- Using logins or passwords of other users without authority.
- Making video or audio recordings of any workplace conferences or discussions without specific, written authorization from headquarters Human Resources or General Counsel of the Company.
- Using Company stationery or electronic forms for personal correspondence. Personal correspondence must not appear to be an official communication of the Company.

All files that are downloaded first must be scanned for possible infection. Any employee who knowingly tries to spread infected files or viruses will be subject to termination of employment and/or criminal prosecution. All files and software lawfully downloaded through use of Company property themselves become the property of the Company.

The Company has installed a variety of systems to thwart intrusion by outside hackers. These systems must always be maintained. Any user who tries to override these security measures will be subject to termination of employment and/or criminal prosecution. In addition, employees are expected to support and adhere to all security precautions to ensure all Company systems are protected (i.e. Locking computers when leaving the work area).

Employees are required to disclose their identity honestly when they send electronic mail. Special care must be taken to avoid disseminating confidential information over the Internet. When employees are in doubt about dissemination of information, they should contact their supervisor for approval to release the information.

Social Media Policy

To assist you in making responsible decisions about the use of social media, we have established these guidelines for appropriate social media use as it relates to the Company. Note: As used in this policy, "social media" refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, Instagram, TikTok, and SnapChat, among others.

Social media includes all means of communicating, posting information, or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, as well as any other form of electronic communication. Ultimately, each employee is responsible for what he/she posts on social media. Before creating social media content, employees must consider some of the risks and rewards that are involved.

Off-duty use of social media. Employees may maintain personal websites or weblogs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the Company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas. However, the Company may implement disciplinary action up to and including termination for posting social media content that violates Company policy, including but not limited to our policies on discrimination and harassment and protection of confidential information.



On-duty use of social media. Employees may engage in social media activity during work time provided it is directly related to their work, approved by their manager, and does not identify or reference Company clients, customers, or vendors without express permission. The Company monitors employee use of Company computers and the Internet, including employee blogging and social networking activity. Employees must keep in mind that if they post information on a social media site that is in violation of Company policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action.

Competition. Employees should not use a social media to criticize the Company's competition and should not use it to compete with the Company.

Confidentiality. Do not identify or reference Company clients, customers, or vendors without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary business information.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the National Labor Relations Act to engage in protected concerted activities with other employees to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits. The Company prohibits taking negative action against any employee for reporting a possible violation of this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible violation of this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.