

FBD Code of Business Conduct

FBD® CODE OF BUSINESS CONDUCT - <https://fbdfrozen.com/fbd/code-of-conduct>

The reputation and success of FBD® is grounded in principles of accountability, honesty, and integrity in all aspects of its operations and activities. FBD® core values and culture embody a commitment to ethical business practices and good corporate citizenship wherever it does business. FBD® policy is to conduct business in a manner which ensures:

- fair treatment of all employees and clients;
- transparency in business policies and practices;
- high standards in all matters relating to health, safety, and the environment; and
- ethical business practices throughout our operations around the world

The FBD® Code of Business Conduct ("Code") summarizes core values and outlines the broad principles of ethical and legal conduct embraced by FBD® to guide business related conduct in all countries where it does business. All employees, agents and representatives of FBD® Partnership, LP ("FBD®") and its subsidiaries are expected to act in accordance with the highest ethical and legal standards and in full compliance with applicable laws where FBD® does business. FBD® also expects the suppliers, independent contractors, and consultants with whom it does business to adopt and conform to similar values and standards.

FBD respects the right to privacy of all employees in their personal activities that have no bearing on their responsibilities to the Company. However, employees must examine their activities, and those of family members, to ensure that no activity, whether direct or indirect, might adversely affect the reputation of FBD®. When faced with a difficult situation, ask yourself the following questions:

- Does the action comply with this Code?
- How will your decision affect others, including our customers, shareholders, employees and the community?
- How will your decision look to others? If your action is legal, but can result in the appearance of wrongdoing, consider taking alternative steps.
- Have you contacted management regarding the action?

ETHICS & THE LAW: FBD® is strongly committed to the highest standards of ethical conduct. FBD® is also committed to full compliance with all applicable national and international laws, including those relating to antitrust and promoting fair competition; corporate governance; preventing bribery, illicit payments and corruption; publicly traded securities; safety in the intended use of the products and services FBD delivers to customers; labor laws and practices; the environment; human rights laws and internationally recognized standards; and protecting copyrighted Company assets and other forms of intellectual property.

HUMAN RIGHTS: FBD will respect and promote human rights. In accordance with the international community, FBD recognizes that certain human rights should be considered fundamental and universal,

based on accepted international laws and practices. FBD will comply with applicable laws governing employee hours of work; child and/or forced labor; employee freedom of association; and collective bargaining rights.

CONFLICT OF INTEREST, GIFTS, & BRIBES: FBD employees must avoid any activity that leads to a conflict of interest. The interest of FBD must always be placed ahead of any personal interest or gain. All potential conflicts of interest must be reported to the FBD Director of Human Resources immediately. Potential conflicts of interest include, but are not limited to:

- personal financial interests that might affect business judgment.
- access to confidential information for personal enrichment.
- outside employment that adversely affects work performance for FBD
- acceptance and giving of personal gifts, hospitality, and/or payment for services other than gifts of nominal value or reasonable hospitality given in the ordinary course of business.

Any agreement or understanding regarding favors or benefits in exchange for the gifts must be avoided. Gifts, other than nominal value, may not be accepted without full disclosure to, and prior authorization from, Human Resources. FBD and its employees will not pay or offer to pay bribes or illicit payments to government officials or candidates, or other parties, to obtain or retain business. FBD does not provide financial support to foreign or domestic political parties or other political groups. Employees are prohibited from using corporate assets for anything other than legitimate business or other authorized purposes.

HUMAN RESOURCES: FBD is committed to providing a work environment that values diversity and equal opportunity among its employees. The Company has developed human resource policies which are intended to create a respectful workplace where employees have the opportunity to reach their highest potential. In accordance with applicable laws and regulations governing employment matters in countries in which it operates, FBD promotes equal opportunities to all individuals regardless of race, color, religion, sex, national origin, age, veteran status, disability, genetic information, and marital status. All employees are expected to conduct themselves in a manner appropriate for their respective work environments and are expected to be sensitive and respectful of the concerns, values, and preference of others. Harassment or discrimination against any person will not be tolerated.

ENVIRONMENT, HEALTH & SAFETY: Protecting people and the environment is an integral part of FBD business practices. All employees are responsible for ensuring FBD products and operations meet applicable government or FBD standards. FBD proactively seeks ways to eliminate injuries, prevent adverse environmental and health impacts, reduce wastes and emissions, and promote resource conservation in everything it does.

SUPPLIERS: FBD® is committed to work only with subcontractors or suppliers who adhere to international standards of human rights and environmental laws and practices. FBD® will take appropriate measures upon notice that any of its subcontractors or suppliers are not complying with international standards of human rights and environmental laws and practices.

IMPLEMENTATION: Compliance with this Code extends to all matters, including decisions relating to trade, investment, subcontracting, supplying, business development, and in all other business and employment relationships. Although difficult questions of interpretation may arise in specific instances, particularly regarding the need to balance local customs and requirements with global

standards and guidelines, FBD® commits to address and resolve any identified ethical, legal, environmental, employment, and human rights issues consistent with the Code.

Employees are subject to the laws and regulations of the country where they work and, because FBD® Partnership, LP is a U.S. based company, U.S. laws and regulations may also apply to employee conduct occurring outside of the U.S. Contact the Human Resources Department if there appears to be a conflict between this Code and applicable laws or if there is any question regarding the interpretation of applicable laws. As a general rule, any conflict between applicable Company policies and applicable laws should be resolved by compliance with the more restrictive policy and/or law.

It is the responsibility of each FBD® employee to comply with this Code. Because these principles are not intended to be a complete list of potential ethical and legal issues, employees must use common sense and reasonable business judgment consistent with this Code in all business activities. Questions about the application or meaning of any provision of this Code, or potential violation of this Code, must be reported to the Director of Human Resources immediately for investigation and/or resolution as appropriate. Employees who violate this Code will be subject to disciplinary action, up to and including termination of employment.

Employees must report violations of this Code. In addition to reporting violations in person or by other regular means of communication, employees who wish to report violations anonymously may choose one of the following methods:

- Electronically through Paycom's "Ask Here" feature; or
- Via mail: Human Resources Department, P.O. Box 18597, San Antonio, Texas 78218

Retaliation against employees who report violations of this Code is prohibited.

This Code is not, and should not be construed as, a contract of employment for a definite term or a guarantee of continued employment. Unless otherwise specified in writing signed by the President of the Company, FBD® employees are at-will employees.