








STRENGTHEN THE CHAIN

CODE OF
CONDUCT



TABLE OF CONTENTS

	INTRODUCTION	3		WORKING ETHICALLY WITH OUR CUSTOMERS AND STAKEHOLDERS	25
	Strengthen the Chain	5		Antitrust and Fair Competition	26
	Why We Have a Code and How We Use It	5		Anti-Corruption and Bribery	27
	Our Responsibilities Under Our Code	6		Gifts, Meals, Entertainment and Travel	28
	Additional Responsibilities for Managers	6		Trade Compliance	29
	LIVE OUR VALUES - SPEAK UP	7		SUPPORTING OUR SURROUNDING COMMUNITIES AND PROTECTING OUR PLANET	32
	Living Our Values Requires Us to Speak Up	8		Political Activities, Political Contributions and Lobbying	33
	When We Speak Up, We Live Our Lineage Values	8		Protecting Our Planet	34
	Knowing When to Speak Up	9		Social Impact	35
	Speak Up Resources	10		Community Service and Charitable Giving	36
	How to Raise a Question or Report a Concern	10		CONCLUSION	37
	Ethics Hotline	10			
	Our Open Door Policy	11			
	Our Commitment to No Retaliation	11			
	What to Expect When You Speak Up	11			
	ACTING RESPECTFULLY AND RESPONSIBLY IN THE WORKPLACE	12			
	Safe and Healthy Workplace	13			
	Mutual Respect	14			
	Inclusive Culture	15			
	Financial and Accounting Standards	16			
	Document Management and Record Retention	17			
	Conflicts of Interest	18			
	Protection of Assets	19			
	Confidential and Proprietary Information and Intellectual Property	20			
	Use of Technology in the Workplace	21			
	Data Protection, Privacy, and Personal Information	22			
	Careful Communication and Social Media	23			
	Insider Trading	24			

INTRODUCTION



Our values define who we are at Lineage and connect us to one another as a global team. Working in line with our values makes it possible to achieve our purpose as an organization — to transform the food supply chain to eliminate food waste and help feed the world.

Each role within the cold chain is critically important and, by acting with integrity and living by our values, **we can strengthen the cold chain together — for the good of our communities and the world.**

Use this Code to ground yourself in how our values apply to your work at Lineage.

Lineage is made stronger by this incredible team. I am grateful that this team is committed to living by our values and making smart and responsible decisions for the good of the business every day. Thank you for being a part of the Lineage family.



Greg Lehmkuhl,
Chief Executive Officer



As a public company, strong financial controls reflect our values and our commitment to doing what's right. Each of us plays a role in living up to our Code of Conduct and the ethical and legal obligations it contains. By acting with integrity and professionalism, we protect our company and honor the trust placed in us by our shareholders.



Robb LeMasters,
Chief Financial Officer

INTRODUCTION



Transparent and open communication is essential to building an awesome workplace culture. As a leader, you need to be able to openly communicate with your team, and as a team member you need to be able to communicate with your leader and coworkers. Don't hesitate to lean on our Speak Up resources when you have a question or concern and reach out to your manager, supervisor or HR business partner for support in resolving any issues.

Kelly Burlage,
Chief Human Resources Officer



Our customers trust us because we have earned their respect as an ethical and strategic business partner. Strengthening the cold chain requires us to understand how to perform our jobs responsibly and to comply with the laws and regulations that apply to our work. Use this Code to guide your actions so that you are always clear on your individual responsibilities and how they impact the larger operations of our One Lineage team.

Jeff Rivera,
Chief Operating Officer



Our Code of Conduct reminds us that our individual voices have power. Although we never expect ethical issues to arise at Lineage, we want all team members to trust that we are prepared to respond to questions and concerns supportively, across all areas of our business.

We are counting on you to speak up if you have questions or concerns. Use this Code as a reference for who to contact if you have a question and as a reminder that the company will support all team members who ask questions or raise concerns in good faith.

Natalie Matsler,
Chief Legal Officer

STRENGTHEN THE CHAIN

Our values define who we are at Lineage and connect us to one another and to our work. Working in line with our values enables us to make a difference in the world by supporting our purpose to transform the food supply chain to eliminate waste and help feed the world. And it enables us to create a great place to work.

Each one of us understands that our individual role on the cold chain is as important as the next, and that by acting with integrity and in the spirit of our values, **we are strengthening the chain together.**

Why We Have a Code and How We Use It

Our Code of Conduct (Code) takes our values and translates them to action. Our Code provides guidance on our shared responsibility to conduct business in a manner that complies with the law, to respect the people we work with and communities we serve and to protect the integrity of the food supply chain.

Strengthening the cold chain requires everyone to be their best. As a global company, we must contend with and follow a complex array of laws, regulations and public expectations. Our Code highlights expectations in key areas of our business and helps guide our decision-making so we can avoid actions that might cause legal risk or damage our reputation. Lineage's company policies align with our Code and provide additional specific information on certain topics. If there is a conflict between local law and our Code, and you cannot abide by both, then consult one of your Speak Up Resources.

Throughout the Code, we have included two different types of calls to action: **Linking It Together** and **Check the Temperature**.



LINKING IT TOGETHER further explains terms related to the topics discussed in our Code and provides additional detail in places where it might be helpful. Our goal of *Strengthening the Chain* requires us to develop a deeper understanding of each topic so that we can be confident that our decisions align with our responsibilities to act with integrity and in line with our Code and our values.



CHECK THE TEMPERATURE provides questions to ask ourselves about each topic to gauge whether a situation feels right. *Strengthening the Chain* requires **us** to trust our own intuition and to seek guidance when we need it.



Our Responsibilities Under Our Code

Our Code of Conduct applies to all officers, directors and team members — everywhere we do business. Failure to comply with our Code may result in disciplinary action, up to and including termination of employment and possible civil and criminal prosecution.

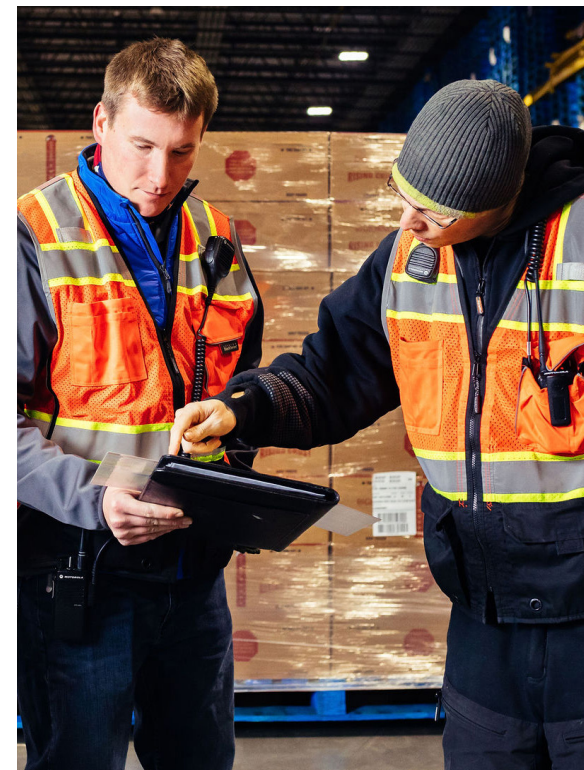
- TEAM MEMBER RESPONSIBILITIES:**
- Understand and adhere to all Lineage policies, laws and regulations, including our Code.
 - Report any concerns of behavior that you reasonably believe violates our Code, Lineage policies or other laws/regulations to our Speak Up Resources.
 - Review and confirm your understanding of our Code every year.

We also expect that all individuals and organizations that partner with us or do business on our behalf will act in accordance with our values and our commitment to act with integrity.

Additional Responsibilities for Managers

Lineage empowers managers to lead with our values and to act with integrity. With leadership comes specific obligations and additional expectations. If you are responsible for managing team members, you must work proactively to influence the people you support to lead with our values and to act with integrity in line with our Code. Additionally, you should:

- MANAGER RESPONSIBILITIES:**
- Be a role model and lead with actions that are consistent with our Code and good decision-making.
 - Set the right tone by being comfortable bringing up our Code, talking to your team members about how it applies to our work and making your team members feel safe to ask questions and share concerns by talking about our Speak Up Resources.
 - Celebrate wins by using Values Cards to recognize team members who succeed with integrity.



If you feel a waiver of this policy is necessary or appropriate, you may submit a request for a waiver and the reasons for the request to the Lineage's corporate compliance and ethics office at ethics@onelineage.com. Any waiver of this policy for executive officers and directors, or an immediate family member of a director or executive officer, may be made only by the board of directors and will be disclosed in the manner and timeframes required by the SEC and applicable listing standards.



**LIVE OUR VALUES-
SPEAK UP**

STRENGTHEN  THE CHAIN



LIVE OUR VALUES - SPEAK UP

Living Our Values Requires Us to Speak Up

We expect team members to speak up — both to ask questions and to raise concerns about misconduct or potential misconduct.

When you speak up, it helps make things better — for you, your fellow team members and Lineage as a whole. Speaking up reflects our Lean culture and enables us to continuously improve by understanding the situation and supporting our approach to problem-solving. It also enables us to address your concerns, resolve issues early on, “cool things off” and reduce risk to Lineage and to one another.



When we speak up, we live our Lineage values



SAFE We speak up because we are responsible for our own safety and the safety of others.



TRUST We speak up because we support a fear-free work environment where everyone’s voice matters.



RESPECT We speak up because we value every team member enough to stand up for one another.



INNOVATION We speak up because sharing our ideas and observations enables us to move Lineage forward.



BOLD We speak up because doing something hard is often essential to achieve the greater good.



SERVANT LEADERSHIP We speak up because we have a responsibility to lead with our values and to act with integrity.

SAFE IS OUR #1 VALUE.

And it transcends everything we do at work. From how we receive, put away, store, retrieve and ship food, to how we perform our jobs, to how we look out for one another in the workplace. Safety also applies to our shared belief that honesty and transparency are important, and that team members will not be punished for speaking up in good faith with ideas, questions or concerns.

Knowing When to Speak Up



TEAM MEMBER RESPONSIBILITIES

Team members must report suspected or actual violations of our Code, law, rules or regulations to a Speak Up resource. Examples of situations that must be reported include:

- Harassment or bullying
- Bribery or kickback schemes
- Inappropriate gifts or gratuities
- Questionable accounting or auditing matters
- Conflicts of interest
- Food safety concerns
- Regulatory violations
- Insider trading
- Disclosure of confidential information
- Environmental, health or safety concerns
- Theft
- Financial wrongdoing
- Inappropriate conduct with competitors



CHECK THE TEMPERATURE Better Together

If you are faced with a difficult decision or an ethical dilemma, it is crucial to **keep your cool** — this means taking a moment to pause, take a step back and consider the situation carefully. If you have a question or concern — **or if things are heating up** — **Check the Temperature** of your situation and consider the following questions:

- Do my actions reflect our Lineage values?
- Do my actions promote the physical and psychological safety of my team members?
- Is this the right thing to do?
- Have I gathered and reviewed all significant facts?
- Would my actions be well-received by our customers, partners, the media or the community?
- Will this action impact Lineage's reputation?
- Would I be embarrassed or uncomfortable if my coworkers or family found out about my actions?
- Do my actions comply with our Code and policies, and the law?

It can be helpful to talk through these questions and concerns if you feel uncertain about your actions or decisions. We encourage you to contact our Speak Up Resources whenever you have questions or need guidance or support.





Speak Up Resources

How to Raise a Question or Report a Concern

If you have questions or need to report concerns about misconduct or potential misconduct, contact any one of the following Speak Up Resources:

- **Your manager or supervisor**
- **A member of the Human Resources Team**
- **The Corporate Compliance and Ethics Team**
(ethics@onelineage.com)
- **Lineage Ethics Hotline** (onelineage.com/ethics-compliance#speakup)

Any contact with our Speak Up Resources will be handled in accordance with local law and any applicable local policies (e.g., any applicable grievance, complaint or whistleblowing policy in the applicable jurisdiction).



Lineage Ethics Hotline

We want you to feel comfortable approaching your manager or supervisor with questions and concerns. At the same time, we understand there may be situations in which you prefer another option. We established the [Lineage Ethics Hotline](#), hosted by a third-party provider, to assist you in reporting concerns or raising questions related to misconduct or potential misconduct.

The Lineage Ethics Hotline is available 24/7, confidential, and where allowed by local law, anonymous: onelineage.com/ethics-compliance#speakup.

What to Share

When you submit a report, please provide detailed information to help us assess and review your concerns, such as:

- Names and positions of the people involved or those who have information about the incident
- Dates of the incident(s)
- Detailed explanation of the incident(s)
- Copies of any relevant documentation or communications

Where to Report

We encourage you to raise concerns through internal channels, giving our company the chance to review the matter and take action, if needed. In this way, we can truly Live Our Values – Together. You may also communicate directly with relevant government authorities about potential legal violations, with or without notifying Lineage.

Our Open Door Policy

One of the ways that we promote psychological safety at work is by creating a culture that empowers all of us to speak up without fear of retaliation. At Lineage, our Open Door policy is designed to foster an environment where all team members feel comfortable asking questions and raising concerns.



MANAGER RESPONSIBILITIES

We expect leaders to:

- **Demonstrate our value of Servant Leadership by modeling openness and transparency**
- **Listen to team member concerns**
- **Ask questions as necessary and respond accordingly, escalating to the Corporate Compliance and Ethics Office when appropriate.**

Our Commitment to No Retaliation

At Lineage, we do not tolerate retaliation when team members raise concerns, and we are committed to supporting anyone who speaks up in good faith about potential matters of concern. Retaliation happens when someone is treated differently, either formally or informally, because of raising a concern, reporting potential misconduct or participating in an investigation. Retaliation may also be defined and/or prohibited specifically under local law.

Examples of retaliatory behavior include:

- Being demoted, transferred, paid less or given fewer quality assignments in connection with speaking up
- Being excluded from work-related social outings in connection with speaking up

We know that it takes courage to speak up or raise a concern, and we are counting on you to speak up. No matter how or when you speak up, you can expect to be treated with respect. We do not tolerate retaliation against team members who raise questions or report concerns in good faith or participate in an investigation. Making a report in good faith means the information you provide is complete and you believe it to be true. Anyone who participates in retaliation is subject to disciplinary action.

If you feel that you are being mistreated because you spoke up, contact one of our Speak Up Resources immediately.

What to Expect When You Speak Up

Speaking up reflects our Lean culture and enables us to continuously improve by understanding the situation and supporting our approach to problem-solving. No matter how or when you speak up, you can expect to be treated with respect.

- We will take your report seriously.
- We will investigate all reports promptly, thoroughly and fairly. Team members are expected to participate in investigations when asked.
- While we will make reasonable efforts to safeguard confidentiality during and after the investigation, it might be necessary to disclose certain sensitive information on a need-to-know basis to conduct an effective investigation or pursuant to applicable laws, regulations and legal proceedings.
- We will take appropriate action to address issues identified.
- We will not tolerate retaliation against you for speaking up.



ACTING RESPECTFULLY AND RESPONSIBLY IN THE WORKPLACE

STRENGTHEN  THE CHAIN

ACTING RESPECTFULLY AND RESPONSIBLY IN THE WORKPLACE

Safe and Healthy Workplace

Safe is our #1 value, and this includes both physical and psychological safety. At Lineage, we are committed to providing a safe and healthy work environment for one another. Our value of safe further extends to occupational, environmental, process safety and food safety measures.

We have safety programs, policies, procedures and trainings in place to comply with health, safety, food safety and environmental requirements that promote the safety and security of team members, visitors, contractors and others that enter Lineage facilities, the facilities themselves, the perishable products that we store and the communities we operate in.

TEAM MEMBER RESPONSIBILITIES:

- Comply with all building security procedures at all times, such as wearing your badge or locking your office.
- Engage only in tasks for which you are properly trained.
- Speak up if you have concerns about suspicious behavior from a team member or other individuals in the workplace.
- Avoid activities that may compromise the biosecurity of the work site.
- Be situationally aware to prevent the intentional and/or unintentional contamination of food in our warehouses.
- Report any accidents, injuries or unsafe conditions immediately to one of our Speak Up Resources or your safety coordinator.
- Come to work free from the influence of alcohol, illicit drugs or drugs that have not been safely prescribed or used as prescribed.

LINKING IT TOGETHER

Alcohol at company events and functions

There may be times when alcohol is served at a Lineage event or function. If you are at a social function, event or conference where alcohol is permitted:

- Act responsibly and respectfully, representing Lineage and our values in the best light
- Never act in a way that could endanger your safety or the safety of others
- Feel confident when making the choice to decline alcohol at a company event
- Use our Speak Up Resources if you are concerned about the safety of another team member

CHECK THE TEMPERATURE

Part of creating and maintaining a safe and healthy workplace requires us to share the belief that we won't be mistreated for sharing our ideas, questions, concerns or mistakes. The concept of psychological safety applies to how we learn, how we work together, how we ask questions and express ideas and how we value and treat one another.

ASK YOURSELF:

- Do I feel uncomfortable asking questions?
- Am I concerned people will view me negatively if I share a mistake?
- Do I feel like my opinions and perspective will not be welcome and well-received if I share them?
- Do I feel excluded from workplace meetings or discussions?
- Am I worried that exposing issues in the organization could jeopardize my job?

Answering no to these questions is a good sign that you feel psychologically safe at work. If you are unsure of your response to any of these questions, or if you are inclined to answer yes, Lineage wants to hear from you. Consider talking with one of our Speak Up Resources to explore ways we can work together to improve your workplace experience.

Mutual Respect

At Lineage, respect is one of our core values. Accordingly, each of us is expected to be respectful and considerate of one another — no matter where or with whom we are working. When we demonstrate mutual respect, we work better as a team, creating a work culture of which we can all be proud. We will never tolerate violence, harassment, bullying, intimidation or discrimination. We view such behavior as a violation of our Code of Conduct and, in many cases, it is a violation of the law.



TEAM MEMBER RESPONSIBILITIES:

- Act professionally and courteously and never engage in inappropriate conversations or behavior.
- Make employment-related decisions based on an individual's qualifications and experience and not on characteristics such as race, religion, gender, gender identity, physical or mental disability, age or other characteristics that are irrelevant to the person's capacity to perform the work and/or which may also be protected by law.
- Speak up if you feel mistreated or if you are concerned that someone else might have experienced mistreatment.



LINKING IT TOGETHER Harassment and discrimination

WHAT IS HARASSMENT?

Harassment includes any language or visual, verbal or physical conduct that is unwelcome or unwanted, and is hateful, derogatory, denigrating, intimidating or offensive to others and is based on the following characteristics: race, color, national origin, ancestry, religion, gender, sexual orientation, gender identity, gender expression, age, physical or mental disability, marital status, military or veteran status, pregnancy, childbirth or related medical conditions, genetic information or any other characteristic protected by federal, state or local law. Harassment may occur in writing, in on-line platforms, in spoken/verbal language, physically or visually.

WHAT IS DISCRIMINATION?

Discrimination involves treating someone differently or unfairly based on certain legally protected characteristics, including those described above — for example, deciding not to hire someone because they are a certain age.



CHECK THE TEMPERATURE

There are many ways that harassment and discrimination can occur in the workplace.

ASK YOURSELF: "AM I EXPERIENCING ANY OF THE FOLLOWING SITUATIONS?":

- Unwelcome sexual advances
- Inappropriate jokes, derogatory comments or innuendo
- Verbal threats or implied threats
- Requests for sexual favors, especially by someone in a more senior position
- Visual harassment, through gesturing, photographs or other imagery
- Showing favoritism based on a protected characteristic
- Situations where someone is bullied, punished or treated differently due to their race, age, gender/gender identity, religion, disability or similar protected characteristic unrelated to work performance.

If you experience or notice any form of harassment or discrimination, including a situation listed above, contact one of your Speak Up Resources immediately.

Inclusive Culture

We all deserve to be seen, heard and valued every day when we come to work. We believe that a diverse workforce that reflects different perspectives, experiences and abilities is crucial to meeting the needs of our many diverse customers and to driving Lineage's success.

We are proud of the diversity of our Lineage team, and we are committed to maintaining an inclusive workplace where every team member feels psychologically safe, a shared belief that you can speak up in good faith with ideas, questions, concerns or mistakes.



TEAM MEMBER RESPONSIBILITIES:

- Appreciate that diversity of backgrounds, opinions and experiences makes us a stronger team.
- Make others feel welcome and never intentionally exclude team members from day-to-day and meaningful workplace interactions or conversations.
- Speak up if you feel as though someone is being mistreated or disrespected.
- If unsure of what's appropriate, seek guidance from Human Resources.



LINKING IT TOGETHER Our Inclusive Culture

Our True North for Inclusive Culture at Lineage is simply:
"For all members of the One Lineage team to know they belong."



CHECK THE TEMPERATURE

Every day, there are subtle ways we can demonstrate to team members that we care about one another and our contributions. We can ask ourselves questions, like:

- Am I listening to all perspectives during a meeting — making sure that the other participants feel like they are not being spoken over and that their voices are being heard?
- If a team member has shared personal preferences, such as their pronouns, am I treating that person with respect?
- Am I considering every team member's known work schedule and time zone when scheduling meetings?
- Am I careful not to make quick, uninformed judgments about my fellow team members without getting to know them?

When we ask ourselves questions such as these and take the time to consider how our behavior may affect those around us, we can help maintain an environment where everyone feels included and safe to share their thoughts.

Financial and Accounting Standards

The law requires us to report our finances fairly, timely and in an accurate, complete manner. We must comply with all reporting requirements that apply to us and be honest and clear with both internal and external auditors. By demonstrating integrity in our financial reporting, we not only meet our legal obligations, but we also maintain our standing as a trustworthy company with investors, lenders, regulatory agencies and the public.



TEAM MEMBER RESPONSIBILITIES:

- Create documents, records and disclosures that are factual, accurate and complete, whether internal or external.
- Never ask someone to record or report information that you know is incorrect, or to bypass an internal control.
- Never use, authorize or condone the use of “off-the-books” record-keeping or any other tactic with the intent of misleading someone about Lineage’s actual operations.
- Report any concerns about reporting irregularities to Lineage’s internal auditors or the Audit Committee, following Audit Committee-approved procedures.



LINKING IT TOGETHER Discovering financial record errors

Reporting our financial records accurately ties into our value of being a trustworthy company — and speaking up if you discover an error in financial data ties back to our value of being bold. If you discover an error in financial data after the fact, it is important to report the error immediately to any of your Speak Up Resources so that the error can be properly disclosed and/or corrected.



CHECK THE TEMPERATURE

Fraud can harm all of us — and it’s not consistent with our shared commitment to act with integrity. We all need to be alert to signs of fraud and know when and where to raise concerns.

ASK YOURSELF THE FOLLOWING QUESTIONS:

- Is there a misrepresentation of facts?
- Has any information or evidence been concealed?
- Has there been pressure to misrepresent facts or take dishonest actions?

If the answer to any of these questions is “yes,” contact one of your Speak Up Resources immediately.



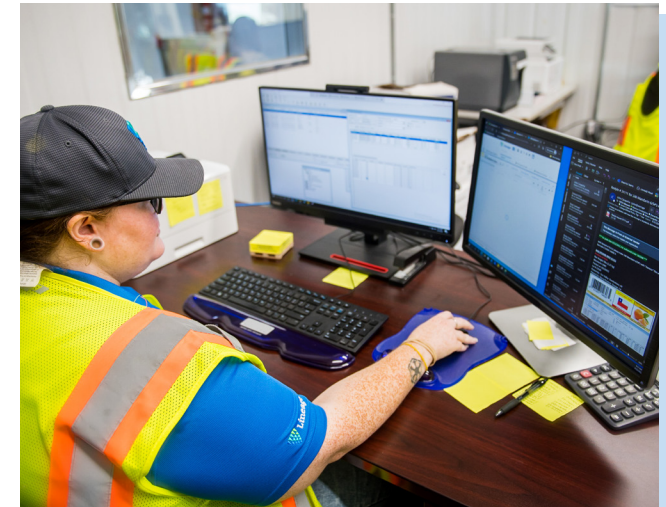
Document Management and Record Retention

We all create, retain and dispose of business records as part of our daily work. Good document management practices enable our business to run smoothly and efficiently, and they promote clarity and transparency with our stakeholders. We are all responsible for managing Lineage records in accordance with our policies and applicable laws and regulations.



TEAM MEMBER RESPONSIBILITIES:

- Be accurate, complete and timely when creating all business records — not just those that apply to our financial and accounting requirements.
- Maintain all business records in accordance with Lineage policies and applicable laws and regulations, which describe how long to retain business records and how to destroy them.
- Contact the Legal Department if you have questions about our document retention policies and procedures.



CHECK THE TEMPERATURE

Keep in mind that certain business records are subject to legally mandated retention periods or contractually agreed-upon retention periods, and in some cases, Lineage may determine that business records should be retained beyond such periods.

BEFORE DESTROYING ANY BUSINESS RECORDS, ASK YOURSELF:

- Have I reviewed the applicable document retention policy and schedule to determine if the record is subject to a particular retention period?
- Have I been notified that these business records are subject to a legal records hold?
- Am I unsure if there is a legal records hold on these business records?

If the answer to any of these questions is “yes,” do not destroy the records. Instead, follow the specific instructions provided by the applicable document retention policy and schedule and/or the Legal Department.



LINKING IT TOGETHER

Examples of business records

- Hard copy or paper records
- Emails or electronic records
- Voicemails
- Photographs

Managing business records well helps our business run smoothly and securely.

Conflicts of Interest

A conflict of interest may exist when our own personal interests, including those of immediate family members, conflict or appear to conflict with the interests of Lineage.

We all need to recognize conflicts of interest that can compromise our responsibilities to Lineage or interfere with our ability to perform our work objectively and effectively.

Although we always want to avoid actual and potential conflicts of interest, often team members and the company can work together to evaluate and resolve potential conflicts. Disclosing conflicts of interest does not mean we can never pursue opportunities outside of our work at Lineage. Rather, it enables us to find solutions that work for both Lineage and its team members.



TEAM MEMBER RESPONSIBILITIES:

- Confirm that any decisions and actions related to your work for Lineage support our company's values and goals.
- If you think your ability to remain impartial could be compromised, talk to your manager, supervisor or another Speak Up Resource.
- Never use your position at Lineage to obtain or attempt to obtain improper personal benefits.
- Do not take personal advantage of, or compete with Lineage for, business opportunities you learn about at work or while using Lineage property or information.
- Disclose all potential conflicts to Corporate Compliance and Ethics.
- Talk to a Speak Up Resource if you are concerned that someone else might have a conflict of interest.
- Any transaction, arrangement or relationship between Lineage and a director, officer or their family members must be disclosed promptly to Corporate Compliance and Ethics, in alignment with the Related-Party Transaction Policy.



CHECK THE TEMPERATURE

Evaluating a conflict can be difficult and may involve several considerations.

ASK YOURSELF:

- Could this relationship compromise, or appear to compromise, my ability to do my work impartially on behalf of Lineage?
- Could my outside interests influence, or appear to influence, my job duties at Lineage?

The answer to these questions should always be “no.” The sooner the appropriate individuals at Lineage become aware of a conflict or potential conflict, the sooner we can work together to resolve it. Please contact one of your Speak Up Resources for guidance if you have questions about if a conflict of interest exists.



LINKING IT TOGETHER

Conflict of interest examples

- Being employed by, or acting as a consultant to, a competitor, potential competitor, supplier or contractor, regardless of the nature of the employment, while employed with Lineage
- Owning or having a substantial direct or indirect interest in a competitor, supplier or contractor
- Accepting gifts, discounts, favors or services from a current or potential customer, competitor or supplier, unless consistent with the provisions of our Code
- Working with vendors, suppliers or partners that employ or are owned or employed by a known family member of a Lineage team member
- Having a direct or indirect supervisory relationship with, or participating in the hiring or selection process of, a relative, romantic partner or close personal friend
- Using your position for personal gain or taking business opportunities learned in your role for your own or anyone else's benefit (except as allowed by law and applicable Lineage policy)

Protection of Assets

Our business operates more efficiently and successfully when we use Lineage assets and our customer assets responsibly. We all have the responsibility to protect these assets, including physical assets, financial assets and information assets, which are discussed in more detail in the section below.

Careless, abusive, dishonest, fraudulent and wasteful treatment of assets have a direct impact on our success. We must use and handle company and customer assets with the same care with which we would use our own personal assets.



TEAM MEMBER RESPONSIBILITIES:

- Use company assets primarily for business purposes, making sure any personal use of company assets is limited and reasonable and does not interfere with your job responsibilities.
- Demonstrate good judgment and seek approval when incurring expenses on behalf of Lineage.
- Act responsibly when using, handling and documenting customer assets such as equipment, materials or products.



LINKING IT TOGETHER

Types of assets

Assets include physical assets, like all types of supplies, consumables, equipment, buildings, furniture, fixtures, tools, products, materials and vehicles. Assets also include financial assets, like funds and billing processes, and informational assets, like our proprietary and confidential information and intellectual property of Lineage and any third-party partners, customers or suppliers.



CHECK THE TEMPERATURE

Strengthening the chain requires us to use company and customer assets responsibly. When you are using company and customer assets — including physical, financial, and informational assets — ask yourself:

- Am I using this company asset for its intended purpose?
- Do I know how to prevent, detect and stop loss, waste and careless use of our company and customer assets?
- Am I incurring expenses responsibly on behalf of Lineage?
- Am I handling and documenting the movement and storage of customer products responsibly?

The answer to these questions should always be “yes.” At Lineage, we all need to work together to keep our company and customer assets safe.

Confidential and Proprietary Information and Intellectual Property

As part of our business, we have access to confidential and proprietary information about Lineage. Confidential and proprietary information is a critical company asset and is often key to our competitive advantage. As part of our business operations, we also have access to confidential and proprietary information about customers, as well as current and prospective business partners. We are all responsible for understanding how to recognize and safeguard this information.



TEAM MEMBER RESPONSIBILITIES:

- **Treat all confidential and proprietary information with care, whether it concerns Lineage or if you learn about it during your work for Lineage (through a customer or business partner, for example).**
- **Use and access confidential and proprietary information only as necessary to do your job.**
- **Be careful when discussing and sharing confidential information — do not share it with someone who is not authorized to receive it or review it.**
- **Do not share confidential and proprietary information with anyone outside of Lineage unless you have written permission to do so. Be mindful of sharing confidential and proprietary information within Lineage as well (e.g., share on a “need to know basis”).**



CHECK THE TEMPERATURE

Sometimes the need to safeguard confidential and proprietary information is not quite as obvious as protecting the papers that have CONFIDENTIAL stamped across them. It's important that we understand the nuances, too. For example, ask yourself:

- **Do I understand that I am responsible for safeguarding the confidential information I have access to while employed by Lineage, even after my employment with Lineage ends?**
- **Do I realize that if someone sends me confidential information by accident, I must delete it and contact one of my Speak Up Resources immediately?**
- **Do I know that even if I trust my coworker to keep confidential information safe, I really can't share it with them — unless they absolutely need to know it as part of their job?**

The answer to these questions should always be “yes.” If you have questions about whether information is confidential, or whether you can share information, contact one of your Speak Up Resources.



LINKING IT TOGETHER Important definitions

CONFIDENTIAL INFORMATION

Confidential information is information about our company or one of our business partners that is not yet available to the public. Some examples include marketing plans, senior management changes, payroll or personnel records or operating and budget information. It can exist in many forms, including written, spoken, observed or electronically stored information.

PROPRIETARY INFORMATION

Proprietary information is a type of confidential information that refers to anything a business uniquely does or creates. It includes corporate intellectual property with federal protections, such as patents, copyrights and trademarks, as well as confidential information, know-how and trade secrets.

INTELLECTUAL PROPERTY

Intellectual property is intangible property, such as patents, copyrights, trademarks and trade secrets. There are laws in place to protect intellectual property. We need to understand when we are working with intellectual property and how the laws apply.

Use of Technology in the Workplace

Secure and reliable information technology resources are essential to the operation of Lineage's business, and it is critical that we safeguard and protect them.



TEAM MEMBER RESPONSIBILITIES:

- Follow our information security policies, including but not limited to the creation, format and scheduled changes of passwords. Use multi-factor authentication where required.
- Use Lineage systems appropriately and primarily for business purposes.
- Do not change, disable or remove any IT configured security settings (e.g., endpoint protection, monitoring tools, encryption, etc.) without prior approval from our cyber security team.
- Never send anything inappropriate through Lineage systems or use them for any illegal or inappropriate purpose.
- Be sure to log in to Lineage systems using your own login credentials, and not someone else's. Do not share passwords.
- Understand that Lineage owns our systems and has the right to monitor the use of our systems (subject to local law) for purposes of protecting our systems and data.
- Report suspicious activity, lost or stolen devices, or potential security policy violations immediately to cyberfusion@onelineage.com.



LINKING IT TOGETHER Information technology

We all play a role in protecting Lineage's information, including personal data, from unauthorized access, disclosure or loss. Understand the risks, educate yourself, and avoid actions that could expose Lineage's systems or data to cyber threats (such as phishing, malware, or unauthorized downloads) or misuse via Generative AI tools. Know how to use Generative AI securely and safely.



CHECK THE TEMPERATURE

Using technology in the workplace requires us all to be vigilant in protecting our Lineage systems.

ASK YOURSELF:

- Have I used strong and unique passwords or passphrases?
- Am I connected to a secure network — including when working remotely?
- Do I recognize, delete and report any suspicious emails or communications?
- Am I performing my job responsibilities from and storing business related data on approved Lineage devices and software?
- Am I careful to ensure my login credentials are not visible to anyone else?

The answer to these questions should always be "yes." We all strengthen the chain together when we prioritize keeping our technology and information safe and secure.

Data Protection, Privacy and Personal Information

While working at Lineage, we may have access to personal and sensitive information about one another as well as about our customers, investors and business partners. We all have the right to trust that our personal information will be collected and used by Lineage in accordance with our values and applicable laws and with regard to privacy as a human right.

There are many laws around the world designed to protect personal information. We are each responsible for safeguarding this information by complying with all data privacy or data protection laws, regulations and procedures that apply to our operations and the jurisdictions in which we work.



TEAM MEMBER RESPONSIBILITIES:

- Never share the personal information of a team member, customer, supplier, investor or any other Lineage stakeholder without specific authorization and a valid work-related reason to do so.
- Collect and use personal information only for the reason for which it was originally collected.
- Do not share private and confidential information with anyone, either inside or outside of Lineage, unless you have consent and authorization.
- When using Generative AI, follow our Generative AI Guidelines and know when to avoid using personal data, confidential business information or other sensitive information — certain tools may retain or expose what you share.
- If you have questions about whether something is considered personal information or how to handle personal information, contact one of your Speak Up Resources.
- Be transparent with individuals regarding how Lineage uses their data in compliance with Lineage privacy notices.
- Keep personal information up to date, correcting inaccurate information when requested and respecting individual legal rights.
- Keep personal data confidential and secure.
- Work with the Legal Department before transferring personal information outside of the country to make sure the transfer complies with local laws.



CHECK THE TEMPERATURE

We live in a digital world, where it is often possible to unintentionally misuse personal information. It is important to be very careful during our everyday work. It's always a good idea to double-check ourselves when we are storing or working with personal information. For example, we can ask ourselves questions like:

- Am I sending this email to the intended recipient?
- Should I hit “Reply all” or should I double-check and limit the recipients who will receive this email?
- Have I retained personal data for longer than necessary to achieve the business objective or meet minimum legal requirements?
- Have I collected or used personal data for purposes that are not reasonably expected by our customers or team members?
- Did I double-check before hitting “send” to make sure I am only including individuals who are authorized to receive it?

If you ever realize that you sent something to someone who should not have received it, or you have collected or stored something in a way that might not comply with our policies, contact privacy@onelineage.com right away and they will help you take the appropriate next steps.



LINKING IT TOGETHER Personal information

Personal information is any information that is related to or identifies an individual person, even without identifying that person by name. For example, something as straightforward as a person's name or address can be considered personal information. Other examples include birthdays, email addresses, telephone numbers or even photographs.

Careful Communication and Social Media

How we communicate reflects upon who we are as a company. Information in our public communications, including those filed with the SEC, must be timely, fair and accurate. Our customers, investors, neighbors, team members and the general public deserve honesty and consistency from us. By using good judgment in all our communications, including when we post to social media, we avoid risky actions online that could harm Lineage — and we do so in a way that enables us to share important information that aligns with our purpose, values and brand.



TEAM MEMBER RESPONSIBILITIES:

- Act professionally and use good judgment in all communications, including social media.
- Know that you are always free to discuss wages, hours, and other working conditions with coworkers and others.
- Get written authorization from the Marketing and Communications team before sharing customer trademarks, graphics or images on social media.
- Do not share any Lineage proprietary information.
- Do not create social media accounts that appear to represent Lineage or create personal social media accounts using your Lineage email address.
- Only communicate with investors, analysts or media if you are an authorized spokesperson. Everyone else must refer all inquiries from reporters or other outside sources to the Public Relations Manager.
- Do not knowingly misrepresent, omit or cause others to misrepresent or omit material facts about Lineage to others, including Lineage's independent auditors, governmental regulators and self-regulatory organizations.
- Maintain familiarity with the disclosure requirements, processes and procedures applicable to your role. Do not give off-the-record guidance and always coordinate with Legal before sharing material, non-public information.



LINKING IT TOGETHER Posting to social media

Social media is a powerful information sharing tool that connects us all together. As a company, Lineage uses social media to connect with our customers and the public. Often, Lineage will feature photos and video clips on our social media sites that feature team members (for instance, our Day in the Life segments on Instagram). Prior to Marketing and Communications posting photos or videos to our corporate channels that involve our team members, we must do everything we can to make sure that we have the appropriate permissions and waivers in place. However, if you see yourself in Lineage's marketing materials and you did not give permission or sign a waiver, you have the right to request that it be removed, if desired. You can reach out to the Senior Manager, Digital Communications to have your image removed from the media library.



CHECK THE TEMPERATURE

We encourage you to use social media, both personally and professionally, to share, learn and grow — but we are counting on you to do so in a way that is respectful and responsible. Please be mindful of what you share, comment on or like on social media — even on your personal pages. Because you are part of the Lineage team, you represent Lineage even when you're not at work.

BEFORE POSTING, ASK YOURSELF:

- Am I posting content that is thoughtful and respectful?
- Is this about my wages, hours and working conditions — or is it something about work that should not be shared?
- Is this post something I would be proud to share with other team members?
- Do I have permission from everyone shown in a photo to post it?
- Does this post represent how I want to be viewed at work?
- Is it possible that my personal social media posts could be misperceived, misquoted or misunderstood — reflecting negatively on Lineage?
- Have I been clear that my personal posts are my own and don't reflect the views of Lineage?
- Do my social media posts about Lineage, our customers or business partners reveal information that would present a safety or confidentiality risk?

When we ask ourselves these questions, we can use social media as the valuable resource that it is, without risking our personal reputation or the reputation of Lineage.

Insider Trading

Insider trading laws are designed to prevent an unfair advantage in the market, and we are all responsible for preventing insider trading. Using material nonpublic information for your financial or other personal benefit, or sharing it with others, violates Lineage policies and may violate the law. We must all commit to adhering to our ethical and legal obligations when we have access to any Lineage nonpublic information. As Lineage continues to grow as an organization, it becomes even more important to remain vigilant in this area.



TEAM MEMBER RESPONSIBILITIES:

- Don't use or share material nonpublic information for financial or any other personal benefit.
- Never buy or sell the securities of any company, either directly or through family members, other persons or entities, while you are aware of material nonpublic information.
- Don't recommend that anyone buy or sell the securities of any company while you have material nonpublic information about that company.
- Only share material nonpublic information when necessary for Lineage's business activities and with proper authorization and proper controls in place (such as a nondisclosure agreement with a supplier).
- Contact one of your Speak Up Resources immediately if you have knowledge that any material nonpublic information has been disclosed inappropriately or if you have questions about whether something is inside information.
- Observe all trading windows, blackout periods and plan restrictions you are subject to, and follow all required pre-clearance procedures.



LINKING IT TOGETHER Material nonpublic information

Nonpublic information is information you may learn in your job about Lineage or other companies with whom we work that has not been made public. Nonpublic information is "material" if a reasonable investor would consider it important in deciding to buy, hold or sell securities, or if publication of that information would likely affect a company's stock price. If you have questions, check the Insider Trading policy.



CHECK THE TEMPERATURE

Protecting inside information allows Lineage to comply with the law and to maintain our reputation of being a trustworthy organization. Inside information can be present in many forms.

ASK YOURSELF

Is this information about:

- A potential merger, acquisition, divestment or financing?
- Customer or vendor relationships?
- Changes in senior management?
- Development of new service offerings and technology?
- Investments, expansions or new sites?

If the answer is "yes," this is material nonpublic information and must not be disclosed. Contact the Legal Department if you have any questions about whether something is inside information.



**WORKING ETHICALLY
WITH OUR CUSTOMERS
AND STAKEHOLDERS**

STRENGTHEN  THE CHAIN



WORKING ETHICALLY WITH OUR CUSTOMERS AND STAKEHOLDERS

Antitrust and Fair Competition

Competition and antitrust laws are designed to promote a fair marketplace and to prohibit unlawful and unfair agreements between competitors. They also prohibit the abuse of market power, including conduct intended to exclude a competitor from a market.

At Lineage, we earn our business on our sound reputation and the superior performance of our services and products — not through unethical or illegal business practices. We are all responsible for understanding the competition laws that apply to the jurisdictions in which we work and for complying with them.



LINKING IT TOGETHER Unlawful interactions with competitors

- Do not discuss or exchange commercially sensitive information, including future price increases, rebates or discounts.
- Do not discuss or exchange Lineage’s current or future strategy.
- Don’t discuss or agree to:
 - Prices or elements thereof such as price adjustments or price fixing, including timing or structure of price adjustments or other commercial terms
 - Market sharing, customer allocation or details about participation in the RFP process
 - Boycotting of any customers



CHECK THE TEMPERATURE

A part of our success lies in understanding the market we serve, learning about our competitors and making the most of our experience in the industry we operate in. However, we need to “play fair” and be careful and honest when collecting, receiving and using competitive intelligence — honoring our Lineage values of Trust and Respect.

BEFORE USING COMPETITIVE INFORMATION, DOUBLE-CHECK TO MAKE SURE:

- Have I acquired information about other competitors through improper or deceptive means, such as spying, theft, misrepresentation or breach of an agreement or confidentiality obligation?
- Have I requested a third party to take an action that we would not take ourselves?
- Have I hired an employee of a competitor to obtain confidential information?

Answering “yes” to any of the above questions would indicate a potential issue. If you have concerns about interactions with competitors, contact the Legal Department right away.



TEAM MEMBER RESPONSIBILITIES:

- Antitrust and competition laws are complex, and you should always feel comfortable consulting the Legal Department with questions.
- Do not directly or indirectly (through a trade association, independent consultant or other third party) discuss, obtain from or share with our competitors, or their employees or representatives, any commercially sensitive information. Commercially or competitively sensitive information is anything that you would regard as a “business secret” (e.g., information about prices, costs, negotiations, volumes, customers, markets, marketing strategy, commercial strategy, etc.).
- Do not make formal or informal agreements with competitors that could limit competition.
- Describe Lineage’s products and services truthfully and accurately when speaking with customers.
- Be especially careful at trade association meetings or gatherings — and walk away from any conversation that involves confidential information or any other off-limits topics.
- Contact the Legal Department if you come across confidential or commercially or competitively sensitive information about a competitor that is not intended for you.

Anti-Corruption and Bribery

Lineage has zero tolerance for bribery and corruption. We do not offer bribes to, nor accept bribes from, government/public officials, commercial business partners, public organizations or **anyone else**. Like all aspects of this Code, this applies not only to everyone who works at Lineage, but also to anyone who works on our behalf, including any agents or business partners.



TEAM MEMBER RESPONSIBILITIES:

- Never offer or accept anything of value in an attempt to influence a favorable business action or decision.
- Never hide or attempt to conceal a payment; all payments must be accurately and completely documented in Lineage’s books and records.
- Before engaging with a third party, such as a consultant or a contractor, contact the Legal Department to complete Lineage’s due diligence policies.
- Oversee third parties carefully, confirming that their actions comply with Lineage policies.
- Record all transactions and payments truthfully and on time.



LINKING IT TOGETHER Bribes

A bribe is something of value that is offered to induce someone to act in a particular way or accepted in exchange for that action. Bribes don’t always take the form of cash and can be offered in many other forms. For example, bribes can include facilitation (or “grease”) payments, kickbacks, illegal gratuities or similar payments, including loans, referrals, gifts, tickets to events, meals, travel expenses and job offers. We are not allowed to offer, give or accept a bribe of any sort. This applies to everyone with whom we work — from foreign officials or government employees to commercial business partners. Even the appearance of a bribe can be damaging, so always be careful when giving or receiving a business courtesy.



CHECK THE TEMPERATURE

It’s important to keep in mind that when it comes to bribery, we can be held accountable for the actions of third parties that work on our behalf. Here are some questions to ask ourselves when working with third parties:

- Do we have concerns about their past behavior, attitude or reputation?
- Do they have any known ties with government officials?
- Are they requesting payment in cash or payment to a country where there is no apparent connection?
- Have they requested payments before services are performed or goods are delivered?
- Have we received bills with no details or supporting documents?

If the answer to any of these questions is “yes,” there is a risk of bribery and corruption — and you must contact one of your Speak Up Resources immediately.

Gifts, Meals, Entertainment and Travel

Gifts and business courtesies can be appropriate as a way to build and foster relationships, and we must exercise good judgment whenever exchanging gifts and entertainment with customers and business partners. At Lineage, we have local policies in place that establish limits on gifts and entertainment. We comply with these policies and all laws and regulations that apply to our business and the region in which we work.



TEAM MEMBER RESPONSIBILITIES:

- Give or accept gifts or offers to participate in business entertainment only when it does not impact your ability to make decisions fairly and impartially.
- Check with your regional Legal Department to understand the monetary limitations imposed on gifts and entertainment.
- Be aware of the specific rules that apply when working with government employees — and never offer gifts or entertainment to (or receive gifts or entertainment from) these individuals.
- Record all gift and entertainment expenses accurately and completely on expense reports.
- Understand that these rules apply not only to you, but also to your immediate family members.



LINKING IT TOGETHER

Acceptable gifts and entertainment

Sometimes it is appropriate to give and accept gifts and entertainment in the course of routine business development. It is never appropriate to give and accept gifts and entertainment when working with the government. All gifts and entertainment must:

- Be consistent with accepted business practice
- Be of nominal value
- Be in good taste
- Be infrequent
- Be unsolicited
- Not be in the form of cash or cash equivalents
- Not embarrass the recipient or Lineage if the gift were publicly disclosed



CHECK THE TEMPERATURE

The decision to give or accept gifts or entertainment is ultimately about using good judgment.

ASK YOURSELF:

- Is the gift a luxury item of high value (such as a designer brand or expensive sporting equipment)?
- Does this gift or invitation create a sense of obligation?
- Could the entertainment be perceived as excessive (such as extended trips or outings)?
- Is this a cash gift?
- Could this gift or entertainment embarrass or reflect poorly on Lineage?
- Is the gift offered during the procurement process?
- Is the recipient a government official?
- Does the gift or entertainment violate the recipient's policies?

The answer to these questions should always be “no.” If you are unsure about whether a gift or entertainment is appropriate, be sure to contact one of your Speak Up Resources for guidance.

Trade Compliance

Our company does business in many countries and regions throughout the world. We are all responsible for understanding and abiding by all applicable trade compliance laws, regulations and Lineage policies and procedures in all countries where we do business. This includes laws that govern the import, export and transfer of goods, data, technology, software and services, as well as all international trade controls, including economic sanctions and embargoes, that impact our business transactions globally.

TEAM MEMBER RESPONSIBILITIES:

- Understand and comply with relevant business procedures, legal requirements and policies that apply to your work and contact the General Counsel of the Legal Department in your region if you have questions about applicable international trade controls.
- Know the trade controls that apply to your job and understand how to comply with them.
- Obtain all required export licenses before shipping products, data and technologies.
- Do not conduct business with parties subject to applicable economic sanctions or trade restrictions.

CHECK THE TEMPERATURE

Remember that our compliance with international trade controls requires us to oversee the work of third parties.

ASK YOURSELF:

- Do you know your business partners — not just your immediate contacts, but also any person, group or country with some involvement?
- Do you understand that there are some places and people with whom we cannot do business?
- Are you watching for warning signs that laws are not being followed?
- Have you asked questions if you are unsure?

The answer to these questions should always be “yes.” Please report any concerns related to trade compliance immediately or contact your regional General Counsel if you need guidance.



LINKING IT TOGETHER Different types of trade controls

IMPORTS: We must correctly classify and value merchandise and provide other information to customs authorities to ensure that all imported goods meet applicable regulatory requirements, including classification, marking of country of origin, record retention and payment of duties, taxes and fees.

EXPORTS: We must follow all applicable laws, regulations and policies that govern the export, reexport and transfer of items and information that leave the country where we work for certain end uses. It is possible to export something during a conversation, by email or while giving a facility tour — even if nothing has been transported physically out of the country. For example, technology and software can be “exported” to the home country of a foreign national when the information is saved, posted or made available in a place where someone in another country can see it — even a Lineage team member.

BOYCOTTS: Certain laws in jurisdictions where we do business prohibit companies from supporting any international boycott. And, even if a country does not have such a law, our policy prohibits the support of boycott activities. For example, we must be cautious when negotiating contracts or agreements that include language in support of a boycott, such as a refusal to do business with a boycotted country or with blacklisted persons for boycott-related reasons.

ECONOMIC SANCTIONS: Economic sanctions restrict Lineage from doing business with targeted countries, entities and individuals based on foreign policy and national security goals. As a global company, we must not work with parties who are subject to applicable sanctions.

Procurement, Suppliers and Company Representatives

Our success as a business is based upon solid relationships of mutual respect and trust and a commitment to be honest in all business interactions. Our procurement team has adopted standards to support us in being fair in our choice of suppliers, consultants and vendors.

We also understand that our suppliers are a reflection of us. For this reason, we expect Lineage suppliers, consultants and vendors to adhere to the highest standards of ethical behavior and regulatory compliance, which are outlined in the Supplier Code of Conduct.



LINKING IT TOGETHER Money laundering

Money laundering is the criminal practice of hiding the source of illegal funds, and some criminals use legitimate companies to facilitate this. To protect against being involved in money laundering, we are committed to help detect and prevent it.

Watch out for warning signs that could signal money laundering, such as:

- Unusually large transactions
- Requests for payments to be made to a country where there is no apparent connection between the country and the third party
- Requests for payments to multiple bank accounts without reasonable explanation
- Lack of transparency in the documentation supporting the transaction



CHECK THE TEMPERATURE

We may be responsible for the actions of anyone acting on behalf of Lineage, so it is important to know our partners well and look out for any potential warning signs of wrongdoing. Here are some questions to ask ourselves when vetting suppliers, vendors and contractors:

- Have we followed our processes for due diligence prior to engaging with a third party?
- Have we conducted thorough follow-ups during working relationships to confirm that all third parties understand and agree to our expectations?
- Have we asked questions and resolved any warning signs noted during the contract negotiation process?

The answer to these questions should always be “yes.” If you have any questions or concerns about a supplier, consultant or vendor, contact the Legal Department or the Purchasing and Procurement Team for guidance. You can also review the Supplier Policy.



TEAM MEMBER RESPONSIBILITIES:

- Select suppliers, consultants and vendors in accordance with our procurement policies and based upon qualifications, pricing and their ability to meet the needs of Lineage.
- Choose suppliers, consultants and vendors that share a commitment to Lineage’s values and commitment to integrity.
- Do not share information provided by one supplier, vendor or consultant (e.g., price, terms, mechanical drawings, technical drawings, related intellectual property or conditions) with another third party.
- Disclose any personal, financial or ownership interest in potential suppliers, vendors or consultants to the Corporate Compliance and Ethics Team prior to engaging with them on Lineage’s behalf.
- Do not accept cash payments.
- Direct suppliers to promptly report actual or suspected violations of the law or this Code to Corporate Compliance & Ethics at ethics@onelineage.com.

Confidential and Proprietary Information of Third Parties

Many of our business relationships involve exchanging confidential and proprietary information among our business partners, including our suppliers, vendors, customers and software providers. Just as we act carefully to protect the confidential information of Lineage, we are all responsible for extending this same level of care to all third parties with whom we work.



TEAM MEMBER RESPONSIBILITIES:

- Protect confidential and proprietary information disclosed by customers and business partners and use it only in accordance with Lineage’s contractual commitments or as otherwise authorized by the third party.
- Use care when developing products or processes for Lineage and take steps to confirm that ideas and innovations do not infringe upon a third party’s intellectual property or violate the terms of a license agreement with a third party.
- Never share or disclose any information from or about third parties without written permission to do so.
- Access third party confidential and proprietary information in accordance with Lineage’s contractual commitments, and only as necessary to perform your job.
- Consult with your supervisor or the Legal Department with any questions about use, access or disclosure of third party confidential and proprietary information.



LINKING IT TOGETHER

What are some examples of third-party confidential information?

- Inventions
- Software
- Trade secrets
- Trademarks
- Name
- Logos
- Copyrighted material
- Pricing
- Product information
- Business plans
- Employee information



CHECK THE TEMPERATURE

If you have received confidential and proprietary information from a customer or business partner, ask yourself the following questions before sharing or discussing the information:

- Has the third party granted you written permission to share the information?
- Is sharing this information necessary to perform your job?

If the answer to any of these questions is “no,” do not share the confidential and proprietary information. Contact one of your Speak Up Resources if you are unsure about whether something is confidential and proprietary.



SUPPORTING OUR COMMUNITIES AND PROTECTING OUR PLANET

STRENGTHEN  THE CHAIN

SUPPORTING OUR COMMUNITIES AND PROTECTING OUR PLANET

Political Activities, Political Contributions and Lobbying

Lineage supports the rights of team members to participate in civic and political activity on their personal time. However, it is important that we keep Lineage business separate from the political process and comply with all laws that govern corporate political activity.



TEAM MEMBER RESPONSIBILITIES:

- Do not conduct personal political activity on Lineage time or using Lineage resources, including Lineage funds, equipment, letterhead or e-mail addresses.
- When expressing yourself in public forums, be clear that your personal views do not represent the views of Lineage.
- Never solicit contributions from your coworkers to support political causes or candidates.
- Do not make campaign or other political contributions on behalf of Lineage.
- Do not engage in any lobbying activities on behalf of Lineage unless it is conducted in conjunction with the Legal Department.



LINKING IT TOGETHER

What is lobbying?

The term lobbying generally covers any act of attempting to influence legislative or administrative action. Only certain team members at Lineage will be granted permission to lobby on behalf of the company.

There are often specific regional regulations and restrictions that apply to lobbying activities, including registration and disclosure. Team members should be mindful of how they interact with government officials and employees (including legislators, regulators, officials or their staff) at all levels of government in order to avoid the inadvertent appearance of lobbying and/or impropriety in such interactions.



CHECK THE TEMPERATURE

There are laws which may prohibit Lineage from making political contributions. These laws vary by country and by region and may factor in other circumstances, such as whether Lineage is seeking government contracts.

ASK YOURSELF:

- Is my political involvement voluntary and personal?
- Am I participating in political activities on my own time and with my own resources — and not using Lineage time or resources?
- Have I clarified that my political opinions and activities are my own, and not those of Lineage?
- Am I complying with all laws related to political activities and contributions?

The answer to these questions should always be “yes.” Consult the Legal Department before making any political contributions on behalf of Lineage and contact one of your Speak Up Resources if you have any questions or concerns.

Protecting Our Planet

Our planet is precious to all of us — at Lineage, we understand our responsibility protect and preserve our shared environment. We promote environmental sustainability through many corporate initiatives, including investments in renewable energy, energy efficient technologies, and innovative solutions to reduce waste and minimize impact.

Sustainability isn't only driven by large scale initiatives but by our everyday choices — how we use resources, how we manage waste and how we care for the communities where we operate. By staying mindful, we can all play a part in building a more sustainable future.



TEAM MEMBER RESPONSIBILITIES:

- Follow Lineage procedures designed to safeguard the environment along the lifecycle of our products and services, in our corporate offices, in our warehouses and on the road.
- Make decisions both large and small to prevent waste across our operations.



LINKING IT TOGETHER Reduce, replace, engage

At Lineage, we follow a reduce, replace, engage strategy for environmental sustainability. We make a conscious effort to reduce our carbon-emitting activities, and we replace them by using clean energy sources. We engage our business partners and the community at large by sharing our practices and commitments to renewable energy as we work to protect our planet together.



CHECK THE TEMPERATURE Take Steps to Reduce Waste

There are many small ways we can evaluate our own day-to-day habits to look for ways to reduce the waste we produce.

ASK YOURSELF:

- Do I really need to print that document, or can I keep it electronic?
- Did I turn the lights off when I left the office for the evening?
- Could I have used a reusable bottle instead of a single use plastic one?
- Should I turn my truck's engine off instead of allowing it to idle?

Making small changes in our daily habits can have a long-term impact on our planet.

Social Impact

Lineage is committed to doing good for our team and our communities. We support and respect the rights of all people and comply with all applicable laws pertaining to freedom of association, privacy, collective bargaining, immigration and working time, wages and hours. We follow all applicable laws prohibiting human trafficking, employment discrimination and forced, compulsory and child labor.



TEAM MEMBER RESPONSIBILITIES:

- Choose to work with business partners who share our commitment to prioritize the safety, health and working conditions of all humans.
- Respect fair labor laws, including wage and hour laws and prohibitions against forced, trafficked or child labor.



LINKING IT TOGETHER What is modern slavery?

Modern slavery is a term increasingly used to describe when people are recruited, moved, harbored or received through the use of force, coercion, abuse or deception, or exploited by other means for personal or commercial gain. At Lineage, we have zero tolerance for modern slavery, and we are committed to evolving our practices to reduce the risk of modern slavery in our supply chains and operations.



CHECK THE TEMPERATURE Modern Slavery

We are all responsible for helping to prevent modern slavery. To do this, we can ask ourselves:

- Are we watching for signs of modern slavery? Signs could be obvious, like workers in a facility who appear younger than those who should be working, or they could be more subtle — like workers who are reluctant to interact with anyone else or appear unkempt, malnourished, frightened or withdrawn.
- Are we speaking up if we have concerns that any of our business partners are engaged in inhumane and unacceptable conditions like unreasonably low pay, no days off, unsafe conditions or substandard housing?

The answer to these questions should always be “yes.” We live our values of being Bold and demonstrating Servant Leadership by speaking up. If you have any concerns related to modern slavery or any other social or environmental issues, report it to one of your Speak Up Resources right away.

Community Service and Charitable Giving

Lineage supports various philanthropic initiatives to have a positive impact in the communities in which we live and work across the globe and empowers team members to get involved and give back to make a difference in our communities. Any charitable donation, sponsorship from Lineage or participation in volunteer service must follow applicable laws, this Code and the Lineage Operating Guidelines.



TEAM MEMBER RESPONSIBILITIES:

- Take advantage of the Time for Good program, where Lineage enables you to request and receive pay for time off to volunteer time to use for pre-approved community service activities.
- Contact Lineage Foundation for Good if you receive a request for Lineage to make a charitable donation of time, items or money, or to sponsor an event.



LINKING IT TOGETHER Charitable donations

Charitable donations aren't limited to monetary donations. They can be:

- Donations of time
- Donations of items
- Donations of money

Be sure to contact Lineage Foundation for Good if you receive a request for Lineage to make a charitable donation of any kind. It is important to comply with applicable laws and Lineage policy when making charitable donations.



CHECK THE TEMPERATURE

When you are volunteering on behalf of Lineage, ask yourself:

- Am I modeling our value of Servant Leadership when volunteering in the community?
- Am I following the Time for Good policy when using the benefit to volunteer?
- Am I treating team members, volunteers and community members with respect, courtesy and dignity during my community service?

Be sure to contact one of your Speak Up Resources if you are unsure about your community service participation or charitable giving.



Lineage[®]

Reimagining the world's food supply chain



CONCLUSION

STRENGTHEN  THE CHAIN

Conclusion

Strengthening the chain requires all of us to do our part to improve the cold chain every day that we come to work. We do this through consistently acting with integrity and in line with our shared company values. Reading our Code is just the start. We encourage everyone to use our Code in your daily life, as a resource to make ethical decisions and act in alignment with who we are as a One Lineage team.

Remember there are Speak Up Resources available to you whenever you have questions or concerns, or if you simply need to talk through an issue with someone. Speaking up reflects our culture of continuous improvement and enables us to make our team stronger by understanding the situation and finding solutions to the problems you may be facing. It also enables us to address your concerns, resolve issues early on, “cool things off” and reduce risk to Lineage and to one another.

How to Raise a Question or Report a Concern

If you have questions or need to report concerns about misconduct or potential misconduct, contact any one of the following Speak Up Resources:

- **Your Manager or supervisor**
- **A member of the Human Resources Team**
- **The Corporate Compliance and Ethics Team**
(ethics@onelineage.com)
- **Lineage Ethics Hotline** (onelineage.com/ethics-compliance#speakup)

Any contact with our Speak Up Resources will be handled in accordance with local law and any applicable local policies (e.g., any applicable grievance, complaint or whistleblowing policy in the applicable jurisdiction).



Lineage Ethics Hotline

We want you to feel comfortable approaching your manager or supervisor with questions and concerns. At the same time, we understand there may be situations in which you prefer another option. We established the Lineage Ethics Hotline, hosted by a third-party provider, to assist you in reporting concerns or raising questions related to misconduct or potential misconduct.

The Lineage Ethics Hotline is available 24/7, confidential and where allowed by local law, anonymous: onelineage.com/ethics-compliance#speakup.

At Lineage, we do not tolerate retaliation when team members raise concerns, and we are committed to supporting anyone who speaks up in good faith about potential matters of concern.

Together we Strengthen the Chain.