



Code of Conduct for Business Partners

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Dayka & Hackett LLC is committed to conducting business with the highest ethical standards. Maintaining these standards has never been more important than in today's global business climate. We have always done business with honesty and integrity, and we ask our suppliers to do the same.

This Code of Conduct for Business Partners ("Code") sets out the expectations and standards of Dayka & Hackett LLC and its affiliates ("DH") that apply to any agents, distributors, dealers, contractors, intermediaries, joint venture partners, suppliers and other business partners doing business with DH ("Business Partners").

Statement of Principles

As a company with global activities, DH is committed to following the laws and regulations applicable to the locations in which it operates. We also seek to conduct our activities responsibly and ethically.

Our commitment to compliance and integrity extends to our Business Partners. We expect our Business Partners to operate and act in full compliance with this Code and applicable laws and regulations. Simply stated, we will obey the law and act ethically and expect our Business Partners to do the same.

Responsibility of Business Partners

The following highlights DH's expectations of its Business Partners:

Applicable Laws and Regulations

Comply with all applicable national, state or regional, and local laws and regulations in the countries in which they operate.

Labor and Employment

Comply with all applicable wage and hour laws and regulations and provide legally mandated benefits.

Never employ workers younger than the local, legally required minimum age, and never use forced, bonded, indentured or slave labor.

Treat each employee with dignity and respect, and do not engage in or permit corporal punishment, threats of violence, or sexual or other forms of unlawful harassment.

Health, Safety and Environment

Provide a safe work environment and conduct business in a manner consistent with all applicable safety standards, including applicable workplace safety laws and regulations and facility-specific safety requirements.

Maintain a robust food safety program that meets or exceeds all applicable food safety standards, including government and industry requirements.

Identify and respond to any public health impact of operations and use of products.

Maintain an effective environmental policy and conduct operations in a way that minimizes any adverse impact on the environment.

Obtain and keep current all required environmental permits and meet all applicable environmental rules, regulations and laws.

Conflicts of Interest

Avoid conflicts of interest with respect to DH businesses and disclose any potential conflicts of interest to DH.

Anti-corruption, Gifts and Gratuities

Enter into all business relationships honestly and ethically.

Bribery, kickbacks or other improper payments, direct or indirect, to any person or received from any person, to obtain a contract, some other commercial benefit or government action are strictly prohibited.

Confidentiality

Safeguard any DH confidential information in your possession, and act with integrity and lawfully in the proper handling of competitive data, proprietary and confidential information, and other intellectual property.

Supporting the Code

Hold employee to these same standards. To the extent they supply goods or services for ultimate sale to or use by DH, hold your suppliers and other third parties to these standards also.

Adopt or establish a management system that supports the content of this Code and drive continuous improvement in these areas.

Monitoring and Compliance

Neither DH nor any of its affiliates or agents assumes any duty to monitor or ensure compliance with this Code, and the Business Partner understands that the Business Partner is solely responsible for full compliance.

DH reserves the right to assess compliance to these requirements and will expect its Business Partners to correct non-compliance issues identified during assessments. DH reserves the right to amend this Code and any of the above listed responsibilities.

Resolving Code or Ethics Issues

Employees of Business Partners are encouraged to work through their own company to resolve internal ethics issues. Business Partners should, however, promptly report violations of this Code or any unethical behavior by e-mailing dhethics@daykahackett.com or by confidentially calling Joe Sanchez, Chief Compliance Officer at 559-648-2285.