

A Note from Our CEO

Greg Lehmkuhl, President & CEO

Every day, the Team Members of Lineage Logistics service the food the rest of the world eats. We assume great responsibility as shepherds of the global supply chain; the decisions we make and the actions we take directly influence the nourishment and safety of our families, friends and communities around the world. Yet Lineage is defined by more than its purpose. At our core, we value not just what we do, but also how we do it.

We look to our six values – Safe, Trust, Respect, Innovation, Bold and Servant Leadership – to help inform our choices and guide our behavior. Harnessing our values in the face of difficult decisions keeps us grounded to the ideals upon which our organization was founded, especially as Lineage continues to grow and transform in pursuit of our vision. They define what is important to us, and they drive our success without compromising our integrity.

We also value operating legally and ethically, everywhere we are and in everything we do. As it is Lineage’s responsibility to deliver safe, quality food from farm to fork, it is the responsibility of every Lineage Team Member to understand and comply with the law as well as Company policies. We expect you to be well informed and to exercise good judgment when making business decisions - it’s not just what you do; it’s how you do it.

Our Code of Conduct, **“Succeeding with Integrity”** provides guidance on how to comply with Lineage policies and related laws and regulations. It is an extension of our values and is designed to help you make good decisions not only for Lineage but also for yourself.

Abiding by a Code of Conduct is important for two key reasons: (1) it signals to customers, partners and Team Members alike that Lineage values doing business honestly and that we take our role in the global supply chain seriously; and (2) it clearly defines our expectations of good, ethical behavior. Our Code applies to all Lineage Team Members, in all roles, at all levels and across all locations, and we expect any third party operating on our behalf to adhere to equally high standards.

As a Lineage Team Member, you are responsible for conducting

yourself with the highest level of integrity – and that starts with reading, understanding and asking questions about our Code of Conduct. It is also your responsibility to speak up if you see or experience something that might violate the Code. You have many reporting options at your disposal, including a confidential helpline (see page 9 to learn more).

I wholeheartedly believe that Lineage Logistics is an incredible place to work because of the incredible people who work here. Thank you for living our values and for your commitment to ethical and legal behavior.

Sincerely,

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Our Values

At Lineage, our six values provide the foundation for how we conduct business and are key to helping us achieve our vision; **to be the most dynamic temperature controlled logistics company in the world.**

SAFE

- We implement and enforce safe work standards and best practices
- We are responsible for our safety and the safety of others
- We are committed to every Team Member returning home safely each day

TRUST

- We understand that each Team Member plays a position that is key to our success
- We have integrity, following through on our commitments and delivering exceptional results
- We expect and foster a fear-free work environment for all employees

RESPECT

- We put our shared interests ahead of any individual or team
- We believe communication is key to ensuring an honest and positive experience
- We act and treat each other with humility

INNOVATION

- We understand that the needs and priorities of the customer come first
- We will always look forward and plan for tomorrow
- We welcome challenges and seek to solve them creatively and without boundaries

BOLD

- We seek understanding and clarity when the path forward is unclear
- We embrace change and the challenges that come with it
- We challenge norms, take informed risks, and make tough decisions

SERVANT LEADERSHIP

- We are positive and focus on meeting the needs of those we support
- We actively coach and develop Team Members
- We celebrate wins and recognize the success of both teams and individuals

Making Good Decisions at Lineage

Practicing good judgment and being trustworthy is key to our success.

Before making a business decision, ask yourself:

DOES MY DECISION SEEM RIGHT TO ME?

- Would you be embarrassed if your family, friends or coworkers knew about your decision?
- Could you look your colleagues, manager, or the CEO in the eye and say you did the right thing?
- Would you be nervous if your actions were made public in the news or social media tomorrow?

DOES MY DECISION ALIGN WITH LINEAGE'S VALUES AND CODE OF CONDUCT?

- Have you thought through your decision by consulting with a professional (co-worker, supervisor, etc.) or referencing company materials (Code of Conduct, safety rules, employee handbook, etc.)?
- Does this decision go against our values:
 1. Being safe?
 2. Demonstrating trust?
 3. Showing respect?
 4. Driving innovation?
 5. Being bold?
 6. Practicing servant leadership?

DOES MY DECISION FOLLOW THE LAW?

- We do not expect you to be lawyer or legal expert.
- We do expect you to ask questions and seek guidance if you are unsure.

REMEMBER...

DON'T EVER BE AFRAID TO:

1. Take the time to think about your decision
2. Speak up if you see an issue
3. Ask for clarification

Who this Code Applies to

This Code provides guidance for performing your daily activities in line with our values, as well as in compliance with applicable laws, regulations, and Lineage Logistics policies and standards. All Lineage Team Members, including officers and directors, must follow the Code. We also expect anyone working with us (consultants, contractors, temporary workers, agency workers) to adhere to these principles which are also set out in a separate Code of Conduct for Contractors.

OUR RESPONSIBILITIES UNDER THE CODE

As Lineage Team Members, you are expected to:

1. Understand and adhere to all Company policies applicable to them and all laws, and regulations, including the Code of Conduct
2. Report in good faith any behavior that you believe is in violation of the Code of Conduct, Lineage policies, or other laws/regulations
3. Annually review and confirm your understanding of the Code of Conduct

MANAGEMENT COMMITMENT

If you are a manager, there are additional expectations in regards to the Code. As a manager, you should work proactively to influence your Team Members to act with integrity and in-line with the Code.

Additionally, you should:

- Be a role model and lead with actions that are consistent with our Code and making good decisions
- Set the right tone by being comfortable bringing up the Code and talking to your Team Members about it
- Celebrate wins by recognizing Team Members that are able to achieve success with integrity

Reporting Concerns or Violations

There are multiple anonymous methods for bringing forward a potential violation of the Code or other Lineage policies. Using the methods below ensures your concerns are captured and followed up appropriately.

E-mail

Report confidentially through our vendor's online reporting system and track the progress of your report as we investigate.

www.lighthouse-services.com/lineagelogistics

Or send an email (any email must include our company's name):

reports@lighthouse-services.com

Phone

Our ethics hotline is available 24 hours a day, 7 days a week to anonymously receive your reports.

United Kingdom 0-808-189-0041
Belgium 0800-262-67
Netherlands 0800- 023-3064
USA: +1 866-360-0008

Mail

Mail your issue or any documentation (any mail must include our company's name):

Lighthouse Services
1710 Walton Road
Suite 204
Blue Bell
PA 19422

Fax

Fax your issue or any documentation (any fax must include our company's name)

+1 215-689-3885

Consequences of Violating the Code

Any report or concern around the code that is submitted will be investigated by an objective and knowledgeable member of the Lineage team. If necessary, the appropriate actions (whether corrective or punitive) will be taken. Any corrective action taken will be conducted in accordance with Lineage policies, required workers' representative requirements (if applicable), and other relevant laws and regulations.

RETALIATION WILL NOT BE TOLERATED

Lineage will not tolerate any form of retaliation against someone who reports a concern or violation around the code in good faith.

Employees who are found to be responsible for retaliation are subject to disciplinary action up to and including termination of employment. If you believe you have experienced retaliation, please report it immediately through any of the reporting methods provided.

AMENDING / WAIVING THE CODE

Per the Lineage Operating Guidelines, any change to the code of conduct must be recommended by the CHRO, General Counsel, CEO, COO, for CFO to the Board of Directors for approval and must be done in accordance with local law provisions.

Doing Business with Integrity

Anti-trust

KEY TAKEAWAYS

- Anti-trust laws are complex, but there is a simple takeaway to them: we should never work directly or indirectly with our competitors in order to limit other competition
- Make sure you are aware of the anti-trust laws wherever you do business, especially internationally

THE DETAILS

Lineage must comply with federal and state anti-trust laws, as well as similar competition laws in other countries where Lineage does business. These laws prohibit or regulate transactions, agreements and relationships that could have the purpose or effect of limiting competition. Examples of actions that could violate these laws include making formal or informal agreements with competitor's (a) regarding terms or pricing of services charged to customers; (b) to allocate markets or customers; (c) to limit output; or (d) to not use a particular product or deal with a particular company. Antitrust laws also prohibit the abuse of market power, including conduct intended to exclude a competitor from a market. Anti-trust and fair competition laws are complex. Team Members should contact the Legal Department with any questions.

Q+A

Q: I was approached by a sales Team Member of one of our direct competitors. He asked if we could make a deal to split up what regions we focused on so that we could both “get a share of the pie.” What should I do?

A: Respond politely that such an arrangement may be impermissible and contact the Legal Department for further assistance.

Anti-corruption, Bribery, and Money Laundering

KEY TAKEAWAYS

- We do not tolerate bribery, kickbacks, or any other form of corruption no matter where and how we conduct business
- Even the appearance of a bribe can be damaging, so always be careful when giving business courtesy.

THE DETAILS

Lineage has zero tolerance for bribery and corruption and conducts its business in compliance with the anti-corruption and anti-money-laundering laws of all countries where we do business, including those countries where our activity is limited to business-related travel. Team Members and all other representatives of Lineage may not offer to pay or accept bribes, kickbacks, illegal gratuities or similar payments to any person, organization or government official to obtain or retain business as such actions are both illegal and violate our Company's values.

Several laws around the world, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Anti Bribery Act 2010, and the Dutch Penal Code which specifically prohibit directly or indirectly offering or giving anything of value to government officials to obtain or retain business, or promising, giving, accepting or seeking a bribe (a bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way). This includes gratuities other than just cash payments such as gifts, meals, entertainment, travel, political or charitable contributions and job offers to government officials' relatives. Prohibited conduct also includes payments and/or gratuities to third parties where there is a reason to believe that at least a portion of the gratuity will be offered to a foreign official or other person or entity to obtain or retain business, influence official action or to secure an improper advantage.

It is important that Team Members declare and keep written, accurate records of all hospitality or gifts given or received so that all payments and business transactions are honestly and completely described. If you are asked to make an improper payment or account for a transaction in an incorrect manner or become aware of any such improper payment or accounting, report it immediately to the Legal Department or through the Ethics Reporting Channels.

Our Company is also committed to combatting money-laundering. Team Members are expected to be alert for red flags that may signal individuals or entities trying to conceal or otherwise make the source of illicit funds look legitimate – any unusual or suspicious payment activity must be reported immediately to the Legal Department.

We recognize that these laws are complex and may vary from one jurisdiction to the next and we encourage you to reach out to your Supervisor, HR Representative, or the Legal Department for guidance if you have any questions or concerns regarding any laws or compliance with Company policies.

Q+A

Q: My team has discovered that we can get our permit approved faster by paying an extra \$50 or local currency equivalent when we apply. Is this allowed?

A: Please contact the Legal Department. This fee may in fact be legal if it is properly documented, by you should always double-check to be sure you are not paying a bribe.

BUSINESS COURTESIES:

Rules on Gifts, Meals, Entertainment, and Travel

KEY TAKEAWAYS

- We understand that sometimes, the best way to build trust and a relationship with our business partners is to do so at a ball game or over a good meal
- We must ensure that the relationships we build are done so ethically and without causing conflicts of interest
- There are set limits on receiving meals, gifts, and event tickets that must be followed at all times, unless you have approval from the proper company officers

THE DETAILS

We recognize the value of building relationships with customers, vendors, suppliers and others with whom we may conduct business. At times that may involve sharing business courtesies such as meals, gifts, favors, discounts, promotional items, travel and other entertainment. Team Members should recognize the difference between appropriately cultivating a relationship based on trust, results and performance versus inappropriately establishing or conditioning a relationship based on offering or accepting lavish business courtesies. Always keep in mind that offering and accepting business courtesies, even if done so innocently, can lead to the appearance of impropriety and/or a conflict of interest.

Nonetheless, depending upon the circumstances and the persons involved there are times when giving and receiving business courtesies is customary and appropriate. In all cases, the business courtesy must be reasonable under the circumstances, in furtherance of a legitimate business purpose, not excessive in value and consistent with the Code and the provisions of this policy. Offering or accepting business courtesies based on personal financial gain or benefit, that create a sense of obligation or that compromise professional judgement or good business practice are never permissible. Gifts of cash or cash equivalents (such as gift certificates) in any amount are always prohibited.

Q+A

Q: A vendor offered to take me to dinner. Is this allowed?

A: Yes, as long as your meal is less than \$250 or local currency equivalent dollars and only happens occasionally.

Q: One of my suppliers gave me a \$25 or local currency equivalent gift card to say thank you for the business. Is this allowed?

A: No. Gift cards are cash equivalents, and can be interpreted as a bribe. Do not use the gift card, and immediately report the incident to your supervisor or through the Ethics Reporting Channels ERC for next steps.

BUSINESS COURTESIES:

Rules on Gifts, Meals, Entertainment, and Travel Cont'd

THE DETAILS (CONTINUED)

In addition to the foregoing, the following limitations and requirements are applicable to receiving business courtesies (please see the Travel and Entertainment policy for gift giving restrictions):

Generally, Team Members may receive:

- Token company promotional items (e.g., clothing, miscellaneous equipment and other branded items);
- Occasional, customary and reasonable business entertainment such as lunches and dinners; and
- Reasonably valued tickets to sporting or other events in furtherance of strengthening a business relationship.

All business courtesies may not exceed the following value limits:

Courtesy Type	non-governmental or non-public sector	governmental or public sector
Gifts	\$250 or local currency equivalent	Not permitted
Meals	\$250 or local currency equivalent	Not permitted
Entertainment	\$250 or local currency equivalent	Not permitted
Travel	OR APPROVAL REQUIRED	Not permitted

Any exceptions to the foregoing limitations must (i) be documented and (ii) approved by a Company officer reporting directly to the CEO.

BUSINESS COURTESIES:

Government Employees

KEY TAKEAWAYS

- The rules for working with government employees are much more strict than for doing business with non-governmental employees
- You should never offer or receive business courtesies from government employees

THE DETAILS

Stricter and more specific rules apply when we do business with federal, state and local governments. Team Members should never offer or provide business courtesies, such as meals, gifts, favors, discounts, promotional items, travel or other entertainment, to a government official unless an exception has been approved in advance in writing in accordance with law, and all applicable Company policies. Further Team Members are expected to know and comply with all applicable laws, rules and regulations when doing business with governments and/or otherwise interacting with government officials. If you have questions about any requirements associated with government-related contracts or dealings with government officials please contact your Local HR Representative or the Legal Department.

Q+A

Q: I've done a lot of work with a government contractor and I'd like to show a bit of gratitude by giving them a Lineage t-shirt from our swag shop. Is that allowed?

A: Unfortunately it is not, due to strict rules and regulations applicable to working with government employees. We recommend a thank-you note instead!

Complying with Trade Restrictions

KEY TAKEAWAYS

- Trade is tricky business, and all of Lineage needs to make sure we're always in compliance with applicable laws
- Under U.S. Law we are restricted from entering into transactions with, in, or that that may benefit certain countries. There are countries that the United States restricts from an import/export perspective. If your job includes international trade, imports or exports, you must ensure you are in the line with those restrictions

Q+A

Q: We have a new brokerage contract that exports to Brazil, and I'm not sure if we have the proper permits. What should I do?

A: Good catch! Contact your supervisor and the Legal Department to confirm we have the proper clearances and documentation. Once you have proper clearance, you may proceed in accordance with such clearance.

THE DETAILS

Lineage provides warehousing, brokerage and related services for customers who operate all over the world. Lineage must abide by all U.S. and applicable international laws governing the import and export of goods, data, technology and services. Among other things, U.S. export laws prohibit the sale of goods and services to certain countries, individuals or entities. Violations, even inadvertent ones, may result in significant fines and penalties, denial of licenses and loss of export privileges.

Conducting Business Internationally

KEY TAKEAWAYS

- Business laws in foreign countries can be very different from those in your local jurisdiction.
- If you're traveling overseas on behalf of Lineage, make sure you're aware of any applicable laws and regulations regarding doing business wherever you are going

THE DETAILS

Lineage acknowledges and respects the diverse cultures, customs and business practices in the international marketplace. In the course of conducting international business, Lineage is subject to other laws and regulations beyond what is directly addressed in this Code. Lineage Team Members who conduct business outside their local jurisdiction are responsible for learning and following all applicable laws and regulations in foreign countries.

Q+A

Q: My team is headed abroad to potentially commit to acquiring a company there. Is there anything we need to know?

A: Contact your local HR Representative or Legal Department for more information around certain limitations, restrictions, and good business practices when conducting business in foreign countries.

Protecting Third Party Intellectual Property

KEY TAKEAWAYS

- Many of the business relationships we have (suppliers, vendors, customers, software providers) involve our sharing and/or receiving confidential and/or proprietary information and/or nonpublic information
- You should not share or disclose any information from or about third parties unless you have prior written approval to do so.

THE DETAILS

Every Team Member has a responsibility to protect confidential and proprietary information disclosed by customers and business partners and to use such information only in accordance with Lineage's contractual commitments or as otherwise authorized by the third party. Confidential and proprietary information of a third party includes, but is not limited to, inventions, software, trade secrets, trademarks, name, logos, copyrighted material, pricing, product information, business plans and employee information. In addition, Lineage uses third-party hardware systems and software programs under licensing agreements that may restrict use and duplication. Team Members should use care when developing products or processes for Lineage and take steps to ensure that ideas and innovations are that of the Team Member and do not infringe upon a third party's intellectual property or violate the terms of a license agreement with a third party.

Team Members should only have access to third party confidential and proprietary information to the extent such information is necessary for the Team Member to perform his or her job function. Similarly, if a Team Member has access to such information, the Team Member must take action to safeguard it and use it only as necessary to perform his or her job function.

Team Members should be aware that, in addition to Lineage's own confidentiality policies, Lineage may also have entered into agreements with third parties where Lineage agrees to maintain the confidentiality of such third party's information. Team Members should consult their supervisors or the Legal Department with any questions about use, access or disclosure of third party confidential and proprietary information.

Q+A

Q: Last week, I attended a paid workshop hosted by an outside provider, and I wanted to share the materials with the rest of my team. Is this allowed?

A: Generally, not unless the provider grants you permission. Even if the material is only used for internal purposes, you may be committing copyright infringement.

Suppliers and Company Representatives

KEY TAKEAWAYS

- When we choose suppliers, we will only do so using relevant and objective criteria
- We encourage Team Members to engage suppliers and others that aligned with the Company's values

Q+A

Q: I'm launching a Request For Proposal and I know that one of the responses will come from my sister-in-law who is a sales rep for one of the potential suppliers. What should I do?

A: This is a potential conflict of interest (due to personal interest in the supplier) and someone else (without any relation to the supplier) should perform the RFP so that an objective decision can be made. If you need further help or guidance, contact your supervisor or your local HR Representative.

THE DETAILS

Lineage's success is based upon solid relationships of mutual respect and trust with suppliers, consultants and vendors. Lineage strives to be fair in its choice of suppliers, consultants and vendors and to be honest in all business interactions. Suppliers, consultants and vendors must be selected based upon appropriate, objective criteria. Team Members responsible for procuring services and supplies must maintain the highest ethical standards and must disclose to Lineage any personal, financial or ownership interest in the supplier, consultant or vendor prior to any such engagement. Likewise, Lineage suppliers, consultants and vendors must adhere to the highest standards of ethical behavior and regulatory compliance.

Lobbying

KEY TAKEAWAYS

- You should never lobby on behalf of the company unless you have been given clear consent to do so
- Always be careful of how you interact with government officials

THE DETAILS

Lobbying activities may require registration and disclosure and be subject to other regulations and restrictions. The term lobbying generally covers any act of attempting to influence legislative or administrative action. Before engaging in any lobbying activities for or on behalf of the Company, Team Members must first consult with their supervisors and the Legal Department. Further, Team Members should be mindful of how they interact with government officials and employees (including legislators, regulators, executive branch officials or their staff) at all levels of government in order to avoid an inadvertent appearance of lobbying and/or impropriety in such interactions.

Q+A

Q: My facility's General Manager has asked me to go down to our local state representatives office to talk about a property tax increase on the ballot. Am I allowed to do this?

A: It depends - gathering facts about governmental actions/ changes in the right way is not considered lobbying. Unfortunately, appearances are everything; contact your local HR representative or the Legal Department before you go for more information and guidance.

FPO

Serving Our Stakeholders and the Company

Insider Information Policy

KEY TAKEAWAYS

- As an employee of Lineage you may have access to certain confidential material and non-public information. You have an obligation to keep such information confidential and be vigilant against inadvertent disclosure of such information.
- You should never “tip off” a colleague, friend, or anyone else to a Lineage action or potential action that is confidential.

THE DETAILS

Lineage Team Members may gain access to material non-public information about Lineage or other companies such as current or potential customers, vendors or acquisition targets. More specifically, “material non-public information” about a company is defined as information that a reasonable shareholder would consider important in making a decision to buy or sell stock. Some examples include: financial information that has not yet been disclosed publicly, merger discussions, customer or vendor relationships, changes in senior executive management,

and development of new service offerings and technology. All Lineage Team Members are obligated to keep this information confidential, and neither the Team Member nor any family member or individuals with whom the Team Member has a significant personal relationship may use such information to trade in any company’s securities. Team Members must never provide stock tips or share material non-public information with any other person who might use it to trade securities in any company.

Q+A

Q: Rumor has it we’re buying a company soon. Is it okay to buy some of their stock in advance because I think the price will go up?

A: No. This action is likely insider trading, and may be prohibited by law. Additionally, you cannot advise a third party (friend, spouse, etc.) to buy this stock based on a “tip” or “gut feeling.”

FPO

Gathering Competitive Intelligence

KEY TAKEAWAYS

- A part of our success lies in understanding the market we serve, learning our competitors, and making the most of our experience in the industry we operate in.
- However, we need to ensure we “play fair” and don’t build that advantage through questionable or illegal business activities

Q+A

Q: A former employee of one of our competitors just joined our company. Can I ask that person for details about her former employer?

A: While you may discuss the general nature of the work the person did, you should refrain from asking about information that may be confidential, contain personal data or potentially trade secret. Please reach out to your HR representative or Legal Department if you are unsure if your question is okay to ask.

Q: I found an interesting piece of data on our competitor’s website. Can I use it?

A: Yes, as long as this piece of information has been publicly disclosed and was not obtained through any illegal means.

THE DETAILS

Lineage has grown through acquisition and is consistently and actively reviewing questions about how to properly receive or collect information regarding third parties, please contact the Legal Department.

KEEPING GOOD BUSINESS RECORDS:

Records Retention

KEY TAKEAWAYS

- For a variety of reasons (legal, regulatory, compliance), certain records and communications (paper and electronic) must be kept for specified periods of time
- Please review the Company’s Records Retention policy or contact your local HR representative or the Legal Department, if you need more information

THE DETAILS

Lineage Team Members create, retain and dispose of business records on a daily basis as part of the normal course of business. Business records include, but are not limited to, paper and electronic records, email, voicemail, and photographs. Team Members must properly maintain all business records by following Lineage’s document retention policies, which include instructions on how long to retain business records and how to destroy them. 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. If Team Members are notified that certain business records are subject to a legal records hold, then Team Members should not destroy any such records and should follow the specific instructions in the legal records hold with respect to the affected documents. Team Members should contact the Legal Department with any questions about document retention policies and procedures.

Q+A

- Q: I have a document that I am not sure how long I should keep. Who can provide me guidance on the retention period for this document?**
- A:** Refer to the Company’s Records Retention policy and schedule to determine how long to keep a document. If you still have questions, contact the Legal Department for further guidance.

FPO

KEEPING GOOD BUSINESS RECORDS:

Financial and Accounting Standards

KEY TAKEAWAYS

- Keeping accurate records of the business we do is important to maintain our standing with investors, lenders, regulatory agencies and the public
- Always make sure any records you produce for the company are fair, accurate, and complete
- Do not hesitate to report any errors that you find!

THE DETAILS

The integrity of Lineage’s record-keeping and reporting systems shall be maintained at all times. Team Members and supervisors are forbidden to use, authorize, or condone the use of “off-the-books” record-keeping or any other device that could be utilized to distort records or reports of Lineage’s actual operating results or financial condition.

Maintenance of falsified, inaccurate or incomplete records can subject the offending individual and Lineage to civil and criminal penalties. If a Team Member becomes aware of any accounting or auditing irregularities or questionable statements in any material disclosed to or intended to be disclosed to Lineage’s auditors or any governmental authority, then such Team Member must report such issue to his or her supervisor, the Legal Department or through the Company’s Ethics Reporting Channels

As a general matter, all Team Members are obligated to create documents, records and disclosures that are factual, accurate and complete, whether internal or external. Examples of this may include, but are not limited to: (a) ensuring that invoices and purchase orders from and to customers and suppliers reflect the actual value and nature of each transaction, (b) not entering into any transaction where a customer is invoiced a purchase price on the condition that the customer later rebate to Lineage some percentage of the purchase price, unless such arrangement is clearly documented in a binding contract and (c) never withholding or distorting data as a means to ensure internally managed business targets are achieved.

Q+A

Q: A colleague told me that her boss has asked her to “fudge” some numbers so that we meet our quarterly goals. What should I do?

A: Report this immediately through our Ethics Reporting Channels. Not only is this against our company values, but it could be against the law as well. Remember the Code of Conduct and Company policy strictly prohibits retaliation against a Team Member for reporting a possible violation of the Code or Company policy.

Q: I found a small error in some financial data we submitted 6 months ago. What should I do?

A: Good catch! The most important thing you can do is report the error immediately to your supervisor so the error can be properly disclosed and/or corrected.

PROTECTING ASSETS AND INFORMATION:

Physical Assets

KEY TAKEAWAYS

- All physical property of Lineage (from buildings, to forklifts, to breakrooms, to offices, to office supplies and to books) should be safeguarded, cared for, used safely and with its intended purpose.
- Respect your fellow employee's space and never take anything from their work spaces.

THE DETAILS

Physical assets are essential to the operation of Lineage's business, and Team Members have a responsibility to safeguard and make efficient use of such physical assets. Physical assets include, but are not limited to, all types of supplies, consumables, equipment, buildings, furniture, fixtures, tools and vehicles used in the course of a Team Member's work with Lineage.

Certain physical assets, including lockers, storage areas, desks, filing cabinets and vehicles are made available to Team Members by Lineage, however Team Members should be aware that Lineage reserves the right to inspect all physical assets at any time deemed necessary or appropriate by Lineage management. Additionally, with appropriate authorization by management, other Team Members may enter a Team Member's desk or other Lineage property at any time in the performance of their job duties, for example, to locate documents.

All Team Members are expected to take proper care of physical assets, which means using them carefully and responsibly and keeping them safe from damage, theft, loss, fraud and misuse. Team Members must follow all Lineage asset protection policies, including using physical assets only for business purposes unless expressly permitted by Lineage policy.

Q+A

Q: I went to use a company vehicle and noticed it was damaged. What should I do?

A: Alert your manager and do not use the vehicle until you are cleared to do so. Remember, safety first!

Q: I think someone stole something from my work area yesterday. Who should I tell?

A: Contact your supervisor and File a formal report. If you need to, please use our reporting methods on page 9.

PROTECTING ASSETS AND INFORMATION:

Use of Technology in the Workplace

KEY TAKEAWAYS

- For many of our employees, using technology is a key part of getting work done on a day-to-day basis
- Make sure to take care of any technology devices (scanners, computers, phones) that are made available to you by Lineage and report any loss/theft of such devices to your local IT Department immediately
- The technology you use should never be used to communicate or store anything that is offensive or inflammatory

THE DETAILS

Secure and reliable information technology resources are essential to the operation of Lineage's business. Information technology resources include all types of communication and computing equipment, including all company-provided cell phones, laptops and computers. Information technology resources also include company-provided e-mail accounts, document storage systems, internet and intranet, networking capabilities and software programs and applications.

All Team Members are expected to take proper care of information technology resources, which means using them carefully and responsibly and keeping them safe from damage, theft, loss and misuse. Team Members must follow all Lineage information security policies.

Lineage permits brief, limited personal communications that do not violate applicable law or Lineage policies and that do not interfere with your or any other Team Member's job functions. In no event may information technology resources be used to access, view, transmit or store any communications of a defamatory, discriminatory, harassing or sexually explicit nature. Team Members should have no expectation of privacy with respect to communications made or information accessed or stored using Lineage information technology resources. Consistent with local law and the Company's policy, Lineage reserves the right to monitor the use of its information technology resources. The communications you make using any of Lineage's information technology resources, even on personal time, that violate the Company's policies and/or this Code, may result in disciplinary action in the same manner as if you were to make them in the workplace. In all events, inappropriate or illegal use of Lineage's information technology resources may result in disciplinary action up to and including termination of employment and other appropriate legal action.

Q+A

Q: A friend of mine sent an email to my Lineage address about weekend plans. Is it okay to write to him?

A: Personal communications on your Lineage devices and accounts are permitted, so long as the communications are reasonable, brief and do not interfere with your job function.

Q: I received a scanner at the beginning of my shift that is heavily damaged. Should I try and use it anyway?

A: Make sure your supervisor is aware of the damage before you start your shift, and never use any devices that could affect your safety or the safety of others or that may jeopardize the accuracy of the work to be performed.

PROTECTING ASSETS AND INFORMATION:

Data Protection Compliance

Key Takeaways

- Respect colleagues', clients' and suppliers' personal data
- Only collect, access, and use personal data which you have a need to know
- Don't share personal data outside of your function or department (including to another group company) without speaking with your line manager first
- Tell your line manager if you become aware of any data security incidents
- Refer to our Data Protection Policy to see your responsibilities

THE DETAILS

We all must be very careful about the way we collect and handle personal data. We need to be transparent about how we are using data and ensure we are treating our customers and colleagues fairly. Every team member is responsible for helping us comply with local data protection laws on an international basis. Data protection laws place obligations on businesses to ensure that they only collect the personal data that they need to carry out their business, and that they protect the personal data they handle on a day to day basis.

Remember, personal data is any information about an individual, even if we don't know the person's name. This information must be kept secure and only used where necessary for limited purposes - even when a third party is processing it on our behalf. Individuals have rights in relation to their personal data, including a right to access, so if you receive a request for personal data from an individual or anyone else, please refer to your line manager in the first instance.

We have policies and procedures in place to help the business comply with applicable data protection laws. Every team member is responsible for ensuring that they are aware of those policies and procedures and they know how to spot and to report a data security breach. Should you need any further information or have any concerns please contact the Legal Department.

Q+A

Q. What is personal data?

A. Personal data is any information which relates to an identifiable person. This could be their name or contact details, but could also include opinions or statements about them, for example as part of their employment records, or pictures or CCTV images of them.

Q. What is a data security breach?

A. A security breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This can be both accidental and deliberate.

PROTECTING ASSETS AND INFORMATION:

Protecting Confidential and Proprietary Information

KEY TAKEAWAYS

- Our intellectual property is a valuable asset that helps us grow and provide a better platform for serving our customers
- You are responsible for the proper management, storage, and protection of any confidential information that you handle

Q+A

Q: Can I tell my co-worker about a potential acquisition target our company is considering?

A: Unless your co-worker is a part of the acquisition team that is working on the same project, you should check with someone else on your project team (like the project manager) first before disclosing any information to your co-worker.

THE DETAILS

Every Team Member has a responsibility to protect Lineage's confidential and proprietary information from unauthorized use and disclosure. By protecting Lineage's confidential and proprietary information, we protect Lineage's competitive advantage.

Confidential and proprietary information includes, but is not limited to, operations, strategies, business plans, budgets, data, pricing, trade secrets, intellectual property, customer information, supplier information, financial information and employee information. Generally, Team Members should assume that information about Lineage is private unless such information has clearly been made public by authorized Lineage personnel.

Team Members should only have access to confidential and proprietary information to the extent such information is necessary for the Team Member to perform his or her job function. Similarly, if a Team Member has access to such information, the Team Member must take action to safeguard it and use it only as necessary to perform his or her job function.

A Team Member's obligation to safeguard confidential and proprietary information continues after a Team Member's employment with Lineage ends. Team Members should be aware that, in addition to Lineage's own confidentiality policies, Lineage may also have entered into agreements with third parties where Lineage agrees to maintain the confidentiality of such third party's information. Team Members should consult their supervisors or the Legal Department with any questions about use, access or disclosure of confidential and proprietary information.

Public Corporate Communications and Use of Social Media

KEY TAKEAWAYS

- Public statements are an important way for Lineage to communicate its purpose, values, brand, as well as important information that the public needs to know; as a result, these communications must be carefully considered and approved by the right individuals

THE DETAILS

Lineage's ever expanding network of facilities and service offerings means that Lineage's business and operations impact a wide range of individuals across the country and the world. Our customers, investors, neighbors, employees and the general public deserve honesty and consistency from us, making it essential that only authorized Lineage spokespersons respond to public inquiries. If a reporter or any other outside source contacts you for a comment concerning our business operations, please refer them to the Communications Director.

Social media is prominent in today's society. All Team Members are expected to be careful about how they might represent Lineage online or in any networking or similar public forum. Team Members must be aware that statements made on social media are not private, may be misinterpreted or taken out of context, and can put Lineage and the Team Member at risk. As described above, if you are making statements about Lineage's business, products or services in any manner where you might be viewed as speaking on behalf of Lineage, you must consult with Lineage's Communications Department before making any such statements. In all events, Team Members must protect all confidential, proprietary and trade secret information of the Company and customers and exercise good judgment when participating in social media and networking forums.

Q+A

Q: I was contacted by a local newspaper to comment on some renovations we are doing to our facility. Can I give them an interview?

A: Unless you have already been given clearance to speak on this subject to this media outlet on behalf of the Company, please wait. Contact the Communications Department first for further guidance.

Q: Can I post about my job on Facebook?

A: It depends. Just remember that you are personally responsible for the things you say about Lineage when you publish something online. You must not say anything that could damage Lineage's business interest or reputation, or to bully, harass or unlawfully discriminate against others. Think before you post!

CONFLICTS OF INTEREST:

Financial Interests in Other Businesses

KEY TAKEAWAYS

- Use good judgment when you are making business decisions to ensure that you have the best interest of Lineage in mind.
- You must always act in the best interest of the Company, and not enter into agreements or arrangements nor take actions that are primarily for personal gain

THE DETAILS

Team Members are expected to make decisions that are in the best interest of Lineage and to ensure your decisions are not compromised by any conflict of interest. A conflict of interest exists whenever a Team Member must make a decision requiring a choice between the personal or financial gain of that Team Member (or that Team Member's family) and the best interest of Lineage. Team Members must avoid any activity that creates or appears to create a conflict of interest. Any actual, perceived, or potential conflicts of interest must be disclosed to your manager. Your manager may involve your local HR business partner and the Lineage Legal Department to help resolve the conflict of interest. Identifying all potential conflicts of interest is not possible, however, below please find guidance on typical situations that can lead to an inappropriate conflict of interest:

- Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while employed with the Company
- Owning or having a substantial interest in a competitor, supplier or contractor
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless consistent with the provisions of the Code
- Working with vendors, suppliers or partners that employ or are owned or employed by family members
- 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)

Q+A

Q: I was just asked to be a consultant for a vendor that works with the Company to provide services unrelated to the services the vendor provides to Lineage. Can I accept this job?

A: Maybe. You need to disclose this potential relationship with the vendor to your supervisor and the Human Resources department so that the situation can be properly evaluated to determine if a conflict of interest would exist.

CONFLICTS OF INTEREST:

Outside Employment

KEY TAKEAWAYS

- Outside employment is permitted but it should not interfere with a Team Member's work performance for the Company. Use of company equipment and resources should never be used when performing work for another employer.

THE DETAILS

Team Members are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below. You should not use Company equipment or resources (including confidential information or intellectual property, or that of our customers and other third parties) in connection with these outside activities, and ensure they don't jeopardize your productivity or ability to perform your duties for the Company. Never engage in any outside employment or other activity that competes with the Company, violates your confidentiality or other obligations to the Company, or that is illegal, immoral or would otherwise reflect negatively on the Company.

Team Members who serve on boards of directors or advisory boards of any entity or organization are required, prior to acceptance, to obtain approval from the Company. If a Team Member already serves on a board of directors or advisory board of any entity or organization at the time of hire with the Company, the Team Member must complete a written disclosure at the time of hire to be reviewed by the hiring manager/supervisor and Human Resources to determine whether it may pose a conflict of interest. Any passive investment of not more than two percent (2%) of the total outstanding shares of a publicly traded company is permitted without the Company's approval, provided that the investment is not so large financially (either in absolute dollars or percentage of Team Member's total investment portfolio) that it creates the appearance of a conflict of interest. However, any investment in more than two percent (2%) of a public company or any investment in a private company that is a current or potential competitor of the Company or that has a business relationship with the Company requires prior approval from the Company.

Q+A

Q: I just got asked to serve on the Board of Directors for a non-profit corporation. Can I serve on this Board and not create a conflict of interest with my job with the Company?.

A: Maybe. Team Members who serve on Boards for any entity should disclose this to the Company to ensure that such service does not create a conflict of interest with the Team Member's employment with Lineage.

Individual Conduct and Supporting Our Communities

PROMOTING AN OPEN WORKPLACE:

Anti-harassment

KEY TAKEAWAYS

- All Lineage employees, customers, vendors, consultants and advisors should be treated with respect and should never be subjected to any form of harassment when interacting with the company

THE DETAILS

Lineage is committed to a work environment free from harassment and discrimination on the basis of an individual's protected status. Harassment may include, but is not limited to, actions, language, written materials or objects that are directed or used in a way that undermines or interferes with a person's work performance or creates an intimidating, hostile or offensive work environment. If you experience or witness any act of discrimination or harassment, report it immediately through the appropriate channels. Depending on your country location this may be your supervisor, a HR representative, the Company's Ethics Hotline or as set out in your country's local policy on this subject. Lineage prohibits retaliation against any individual who raises good faith concerns about or participates in an investigation into an allegation of discrimination or harassment.

Q+A

Q: I witnessed a Team Member using an offensive term towards an openly gay colleague of mine. What should I do?

A: We take harassment seriously and are committed to providing a safe work environment for all of our Team Members. Use the appropriate reporting tools to report what you witnessed. Depending on your country location this may be your supervisor, a HR representative, the Company's Ethics Hotline or as set out in your country's local policy on this subject. Remember, you will not be punished for reporting any violations of the Code of Conduct, even if you are reporting an incident involving a supervisor.

REMEMBER...

You will not be punished for reporting any violations of the Code and/or relevant policies in good faith, even if you are reporting a superior.

PROMOTING AN OPEN WORKPLACE:

No Discrimination and Equal Opportunity Employment

KEY TAKEAWAYS

- We at Lineage believe that a diverse workforce that brings different perspectives, experiences, and abilities is crucial to ensuring we meet the needs of our many diverse customers.
- It is against our values to discriminate in any way against any employee, applicant, customer, business partner, or any other stakeholder.

THE DETAILS

Lineage believes that having a diverse workforce of Team Members who contribute a wide variety of skills, experiences and perspectives is critical to Lineage's overall success. Lineage's policy is to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, gender, sexual orientation, gender identity or expression, age, disability, marital status, pregnancy, childbirth or related medical conditions, genetic information or any other characteristic protected by law. This policy applies to all areas of employment including recruiting, hiring, training, promotion, compensation and benefits, and Lineage

is committed to removing any artificial barriers to Team Member achievement within the company. If you experience or witness any act of discrimination or unequal treatment, report it immediately to your supervisor, a Human Resources representative or through the Company's Ethics Hotline. Lineage prohibits retaliation against any individual who raises good faith concerns about or participates in an investigation into an allegation of discrimination or harassment.

Q+A

Q: I recently applied for a job in another department and I think I wasn't selected because I'm a practicing Muslim. What should I do?

A: Report your concern to your supervisor, local HR Representative or through the Company's Ethics Reporting Channels.

MAINTAINING A SAFE AND HEALTHY WORKPLACE:

Workplace Safety

KEY TAKEAWAYS

- Safety is one of our core values and we will always put safety over any other business goal

Q+A

Q: My team is running behind today and we could save some time by skipping some safety checks. What should I do?

A: Never sacrifice your safety or the safety of your colleagues by cutting corners. If you are ever asked to perform something unsafe, you should report it immediately through the proper channels.

THE DETAILS

Lineage is committed to providing a safe and healthy work environment for its Team Members. Lineage's safety programs, related policies, procedures and accompanying training are designed to promote the safety and security of Team Members, visitors, contractors and others that enter Lineage facilities, the facilities themselves and those people, homes and business that are in close proximity to our facilities. Team Members are expected to comply with Lineage safety programs, policies and procedures, as well as with all applicable environmental, health and safety laws and regulations at all times when on Lineage property or when performing Lineage business. Team Members working at a customer location must also follow that customer's health and safety requirements.

Failure to follow applicable health and safety requirements, engaging in tasks without proper training, or otherwise engaging in conduct that places any persons or property at risk while on Lineage property or performing Lineage business is strictly prohibited. All Team Members have a responsibility to immediately report to Lineage any accidents, injuries or unsafe conditions, as well as non-compliance with Lineage programs, policies and procedures. Such reports can be made to a supervisor, a Human Resources representative, to the Environmental Health & Safety Department or through the Company's Ethics Reporting Channels.

Additional information about Lineage health and safety programs is available from your supervisor or the Lineage Environmental Health & Safety Department.

MAINTAINING A SAFE AND HEALTHY WORKPLACE:

Alcohol and Drugs Policy

KEY TAKEAWAYS

- Being under the influence of alcohol, illegal drugs, and controlled substances (including prescriptions) while at work can compromise your safety and the safety of your colleagues
- Even when the use of alcohol is approved, be sure to use good judgment and remember that you are acting on behalf of Lineage while doing so

THE DETAILS

The Company is committed to providing a safe, healthy and drug-free work environment for its Team Members. Team Members are required to ensure that their work performance and judgement are not impaired by alcohol, the use of illicit drugs or the abuse of prescription drugs or the abuse of any other substance. At all times when working, operating Company equipment on Company property or engaging in Company business, the manufacture, unauthorized use, sale, or possession of illicit drugs is strictly prohibited.

Except for the lawful, moderate and prudent consumption of alcohol in designated and approved Company locations or at legitimate Company related functions and events, the consumption of any alcoholic beverage while on Company property or while engaging in Company business is strictly prohibited. In all instances, driving while impaired by alcohol or other controlled substances is not condoned by the Company. A Team Member's decision to consume alcoholic beverages at a Company related event or location in accordance with this policy is entirely a personal decision and the Team Member's decision to engage in such consumption includes an obligation to act responsibly and safely.

Additional information about Lineage's Drug-Free policy is available from your supervisor, the Human Resources department or by referring to the policy contained in the relevant staff handbook.

Q+A

Q: The office is having a holiday party and there will be alcohol there. Can I drink?

A: As long as it is a properly sanctioned celebration, you may drink at this party so long as you follow the guidelines in the Code of Conduct and in the Company's policies.

Q: I was given prescription drugs for a medical condition and warning states it is not safe for me to work while on them. What should I do?

A: Whatever you do, don't try to work! Get in touch with the appropriate company contact, such as your line manager, HR or company doctor, depending on your work location.

MAINTAINING A SAFE AND HEALTHY WORKPLACE:

Violence in the Workplace

KEY TAKEAWAYS

- None of us at Lineage should ever have to work under the threat of violence or disruptive behavior
- The possession or use of weapons is strictly prohibited on company property or at any company event

THE DETAILS

Lineage is committed to providing a safe work environment that is free from violence. We have zero tolerance for violent behavior in the workplace, including, but not limited to physical altercations, fighting, bullying, intimidation, threats, whether through verbal (comments), non-verbal (gestures or expressions) or electronic communications (including through social media), and the intentional or reckless destruction of property of Lineage, its employees, representatives or customers. Lineage also prohibits the unauthorized possession and/or use of weapons while on Company property or when conducting Company business. All of our Team Members have the right to a safe work environment and we all share in the responsibility of ensuring the safety of others. Any direct or indirect threats of violence, threatening conduct or incidents of actual violence must be reported as soon as possible to a supervisor and the Human Resources Department. Lineage will promptly investigate all reports of violent or threatening behavior and take appropriate action up to and including termination of employment in the event any Team Member is in violation of this policy. In emergency situations where someone is in immediate danger, Team Members should also contact the local emergency number or appropriate local law enforcement authorities.

Q+A

Q: I got into an argument with a co-worker and he threatened to harm me. What should I do?

A: Even in the heat of the moment, we do not tolerate the threat of violence against another employee. Please report the incident to your supervisor, local HR representative or use the reporting tools provided in the relevant staff handbook. If you ever feel like you are in immediate danger, call the local emergency number.

Sustainability and Protecting the Environment

KEY TAKEAWAYS

- Lineage is committed to minimizing the environmental impact of our operations
- it is important that all team members comply with applicable environmental regulations and laws

THE DETAILS

Lineage recognizes the supply-chain solution business is resource intensive and we are fully committed to environmental sustainability. We are focused on protecting our environment by maximizing energy efficiency and reducing waste and harmful emissions. As new technology and requirements approach our industry in the future, we are ready to grow and evolve to surpass current conservation standards and minimize our impact on the environment. Team Members are expected to understand and comply with all environmental laws, rules and regulations when performing their duties and have a responsibility to immediately report to the Legal Department any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

Q+A

Q: While doing some maintenance on our facility, I may have accidentally dumped a hazardous material down one of our drains. What should I do?

A: First things first, ensure everyone is safe by letting your direct supervisor as well as the facility safety team know what happened. If there is a concern you violated a law, make sure to contact the legal team.

Community Service and Charitable Giving

KEY TAKEAWAYS

- Lineage strongly believes in helping our communities, and we support our employees who choose to use their time to do good
- Make sure to obtain necessary approvals for any charity work done on company time

THE DETAILS

Lineage encourages our Team Members to give back. We support community service and charitable donations of time, items or money by Team Members, provided they do not conflict with Lineage interests or reflect negatively on Lineage.

Volunteer efforts in support of Lineage sponsored programs may be done during work hours if approved in advance by your manager. Otherwise, be sure to separate your personal community activities from your work. Pursue community activities on your own time, with your own resources and as an individual private citizen, not as a representative of Lineage.

Please contact Human Resources should you receive a request for Lineage to make a charitable donation of time, items or money, or to sponsor an event. Any charitable donation or sponsorship from Lineage must be in compliance with applicable laws, this Code and the Lineage Operating Guidelines.

Q+A

Q: A charity group I worked with asked me if they could use our facility's parking lot for a fundraising BBQ. What should I tell them?

A: There are several factors that go into this decision. Please contact your local HR representative for guidance.

Q: I would like to collect donations for a charity drive from my co-workers. Is this allowed?

A: There is nothing wrong with asking employees to pitch in, so long as it does not interfere with their work, your work, or you make the employees feel harassed in any way.

Political Activities and Contributions

KEY TAKEAWAYS

- Lineage fully supports your right as an individual to participate in the political process, so long as it is on your own time unless unpaid leave is granted in accordance with local law.
- Do not speak on behalf of Lineage in any political situation

Q+A

Q: My local state representative asked if Lineage would be willing to donate a small sum to his campaign. What should I say?

A: Please refer this representative to the Lineage Communications department for more information.

Q: I want to speak at my political party's local monthly meeting. Is that okay?

A: It is your right to be able to participate in the political process. However, you should not speak on behalf of Lineage or give the impression that you are speaking for the Company.

THE DETAILS

Team Members are encouraged to exercise their right to participate in civic and political activities. However, any decision to become involved is entirely voluntary and personal and must not be conducted on company time unless unpaid leave is granted in accordance with local law or involve the use of any company resources (including, but not limited to, Lineage funds, equipment, letterhead or e-mail address). Team Members must use care to ensure that

their personal political opinions and/or activities are not viewed as those of Lineage. Team Members may not make or commit political contributions on behalf of Lineage and must follow all laws as they relate to political activities and contributions. Please contact the Legal Department should you receive a request for Lineage to make any political contribution.