Code of Ethics & Business Conduct

January 2020
# Table of Contents

**Objective and Introduction** ........................................................................................................... 4

- Our Values ............................................................................................................................................. 4

**Responsibilities** ................................................................................................................................. 5

- Ethics and Communication ................................................................................................................... 5
- Compliance with External Laws and Regulations and Internal Policies and Procedures .................. 5
- Investigations .......................................................................................................................................... 5
- Protection of Company Assets ............................................................................................................. 6
- Integrity and Accuracy of Accounting Records and Standards .......................................................... 6
- Fair and Diverse Work Practices ......................................................................................................... 7
- Discrimination and Harassment ........................................................................................................... 7
- Personal Conduct and the Workplace ................................................................................................. 8

**Representing the Company with External Groups** ......................................................................... 8

- Fair and Equal Treatment ................................................................................................................... 8
- Public Appearances and Media Interviews ......................................................................................... 8
- Relations with Suppliers .................................................................................................................... 8
- Relations with Customers .................................................................................................................... 9
- Political Activity ................................................................................................................................... 9

**Privacy/Confidentiality** ..................................................................................................................... 9

- Confidential or Secret Information .................................................................................................... 9
- Private Information Regarding Stock Markets .................................................................................... 10
- Private Information Regarding Customers or Partners and Data Protection ..................................... 10
- Private Information Regarding Employees ....................................................................................... 10
- Defend Trade Secrets Act Protection ................................................................................................. 10

**Conflicts of Interest** .......................................................................................................................... 11

- Commercial Transactions with Third Parties .................................................................................... 11
- Accepting Gifts, Loans and Other Benefits ......................................................................................... 11
- Gift-Giving and Recreational Activities ............................................................................................. 11
- Investments .......................................................................................................................................... 12
- External Commercial Activities .......................................................................................................... 12
- Use of the Company’s Name, Facilities or Relations ........................................................................ 12

**Other Important Provisions** ........................................................................................................... 12

- Anti-Trust Laws ................................................................................................................................... 12
- Commitment to the Environment and Occupational Safety ............................................................... 12
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communication of Suspicious Activities and Money Laundering</td>
<td>13</td>
</tr>
<tr>
<td><strong>Code’s Implementation and Application</strong></td>
<td>13</td>
</tr>
<tr>
<td>Reporting Concerns</td>
<td>13</td>
</tr>
<tr>
<td>Discipline</td>
<td>14</td>
</tr>
<tr>
<td><strong>Acknowledgement of the Code of Ethics &amp; Business Conduct</strong></td>
<td>15</td>
</tr>
<tr>
<td><strong>Conflict of Interest(s) Disclosure</strong></td>
<td>16</td>
</tr>
</tbody>
</table>
Objective and Introduction

At Perfect Day (or "the Company") people are our greatest asset. Our reputation and success depend on the decisions and actions of every employee. We are committed to ensuring that every action we take honors our company values and fully comply with applicable laws and this Code of Ethics and Business Conduct ("Code").

Perfect Day expects the highest ethical conduct from each one of its employees at all times. Strict adherence to applicable laws governing your work is a cornerstone of this ethical requirement. This Code sets the standard for how we are all expected to act when engaging in business on behalf of the Company. It is your responsibility to thoroughly read, understand, and become familiarized with this Code. Each employee must comply with all specific Company policies and procedures (including those outlined in the Perfect Day Handbook) as well as all applicable laws and regulations when negotiating and/or working on behalf of the Company.

Any breach of this Code may result in disciplinary action, up to and including termination of employment. This Code does not constitute nor should it be interpreted as constituting an employment contract with an indefinite term, nor a guarantee of continued employment.

The principles described in this Code are designed to guide your behavior. The Code defines how you should conduct yourself as a representative of Perfect Day and addresses your responsibility to the Company, to other employees, or customers, suppliers, consumers, and the government. You should be sensitive to potential violations of this Code when you hear comments like:

"Well, just this time."
"No one will notice."
"It's not important how it is done, what's important is that it gets done."
"This doesn't hurt anyone."
"This is only for me."
"If we want to do business in this country/state/market, we must behave like our competitors."

_Ethical behavior is doing the right thing when no one else is watching – even when doing the wrong thing is legal._ – Aldo Leopold

Our Values

Perfect Day’s values are the behaviors that shape the tone of how we work with each other and with our partners. These values are the foundation of our culture and the behaviors we expect you to exhibit to achieve our collective goals.

**We Love Solving Tough Problems**   We are intensely motivated by challenge, utilizing knowledge-based discovery to drive innovative solutions.

**We Learn Continuously**   We accelerate innovation through intelligent risk-taking, learning from failure and nimbly adapting as we gain new insights.

**We Hold Ourselves Accountable**   We demonstrate transparency and integrity in our work to uphold the highest standards of quality and safety.

**We Win as a Team**   We encourage diversity of thought and engaging in collaborative, passionate discourse to achieve ambitious goals.

**We Celebrate our Accomplishments**   We have fun together and firmly believe that celebrating each other and our achievements fosters mutual trust and respect.
Responsibilities

Act with integrity and honesty at all times.

Ethics and Communication

Compliance with these guidelines is a requirement for all employees at Perfect Day. Identifying and addressing ethical concerns in a timely manner is critical to upholding our commitment to conduct our business with integrity while honoring Perfect Day’s values.

Although this Code captures a wide range of business practices and procedures, the Company cannot foresee all possible situations and issues which may arise. If you are not certain of what you should do in any particular situation, seek additional information and guidance from your supervisor or a manager before acting.

Always use good judgment and common sense. If something seems inappropriate or unethical, it probably is. If you are unsure about the course of action for a specific situation, or you suspect or have knowledge of a possible violation of any law, guideline, or procedure of the Company, you must immediately inform one of the following authorities:

- Immediate Manager
- Department Leader
- People & Culture Team
- Leadership Team Member
- Chief Executive Officer
- Our anonymous Ethics Hotline: www.lighthouse-services.com/perfectdayfoods or (855) 650-0005

Speak with any responsible person whom you deem appropriate. You may choose to remain anonymous. If you submit an ethical issue and the matter is not given appropriate attention, you are encouraged to escalate it to any of the contacts listed above.

The Company encourages everyone to present possible ethical issues in a constructive way. The Company prohibits any type of retaliation for having communicated concerns on ethical issues, discrimination or harassment, or for having reported possible Code violations.

Compliance with External Laws and Regulations and Internal Policies and Procedures

It is your responsibilities to carry out your duties in a legal and ethical manner. In addition to complying with all policies and procedures established internally by the Company, everyone must comply with all external laws, rules, and regulations that govern or limit their work area or area of responsibility and/or our industry.

Employees who have direct or indirect contact with government authorities (local, state, federal, etc.) must conduct themselves in a respectful and timely manner, recognizing their position and ensuring an environment of openness, trust and transparency when discussing matters and reaching agreements. You must cooperate at all times with government authorities and follow the law when you represent the Company’s legitimate interests.

Investigations

You must fully cooperate with any duly authorized internal or external investigation, including but not limited to, those related to ethical issues and discrimination or harassment investigations. Providing false or misleading statements to officials and/or internal investigators may be sufficient cause for immediate termination of your employment and may also be classified as a crime with severe penalties. You must not withhold information related to ethical issues. Specific information about procedures for particular types of investigations (e.g., discrimination and harassment investigations) can be found in the Perfect Day Handbook.
Immediately report any suspicious activities that may lead to insider trading, fraud or attempted fraud, and suspicious disappearance of funds or securities.

**Protection of Company Assets**

You are responsible for safeguarding tangible and intangible Company assets, as well as assets under your control that are owned by customers, suppliers, or partners, ensuring their appropriate usage based on the guidelines established in this Code. Company assets may only be used for legitimate business purposes and/or activities. Undue appropriation, neglecting, or squandering of Company assets is a violation of your duties and may be considered fraud.

All ideas, methods, inventions, discoveries, developments, and recipes, whether patentable or not, that relate to your work with the Company and are conceived by you solely or with others are the property of the Company.

All economic rights over any invention, improvement, or discovery made by employees in their jobs are the Company’s property. These must be disclosed to your manager when they take place. When the employment relationship with the Company ends, the Company keeps ownership of rights and information generated or obtained as part of your job.

Partial or full reproduction, sale, use or distribution of information, software and other forms of intellectual property in violation of license terms and copyright, is prohibited.

You must not gain financial benefits derived from tangible or intangible assets or information you may possess because of your position in the Company. Misuse of Company assets may be considered theft and you may be subject to termination of employment and criminal prosecution.

Except in circumstances prohibited by law, the Company reserves the right at all times and without notice, to inspect Company assets in order to determine if they are being used according to the guidelines established in this Code and/or in any internal policy or procedure the Company may have published, or to promote occupational safety or compliance with applicable laws.

**Integrity and Accuracy of Accounting Records and Standards**

The Company’s accounting records are used for preparing reports for external entities, creditors and shareholders, for the Board of Directors and for internal management. All the Company’s accounting records, as well as any other report that includes accounting information, all must comply with the relevant laws and standards.

All books, records and accounts must describe and reflect an honest, exact and fair manner, all transactions and information they contain; therefore, false or fabricated information must not be included; neither should records or information be manipulated with the purpose of altering or distorting financial and economic results or with any other purpose. Furthermore, all transactions must be described with exact and detailed information and must be recorded in the corresponding account and appropriate fiscal year.

You are personally liable for the integrity of records, reports, disbursements and other information under your control. Records must be detailed enough to accurately reflect all Company transactions. Financial statements must always be prepared according to Generally Accepted Accounting Principals (GAAP) and must present the Company’s financial position and operational results with transparency in all important aspects.

When creating business records and other documents (e.g., emails) that may be kept by the Company or a third party, use appropriate and respectful language, considering any third party who may read, analyze, and/or review it. In the future, the Company or a third party may have the need to use or interpret your work, with the advantage of hindsight and the disadvantage of imperfect memory.
It is forbidden to destroy any record that may potentially result in violating a law, including documents which may be relevant to a lawsuit, or any pending government procedure or investigation, foreseeable or imminent.

Transactions must be registered and classified in the accounting period they occur and to the appropriate cost center. The delayed or advanced payment of invoices in order to meet budget goals is a violation of this Code.

The Company is committed to accuracy in all tax-related records in compliance with the intent and wording, in general, of applicable laws. Tax returns must be presented on time and taxes must also be paid on time and according to current tax regulations.

If you discover a weakness or error in the Company’s internal control systems, have knowledge of any inadequate or questionable accounting or internal control matter, or believe an ethical violation has been or will be made, you have an obligation to immediately communicate this to your supervisor. If you feel your supervisor does not handle your concern appropriately, notify the head of your functional area, or People & Culture. Once reported, the Company will take the appropriate actions to investigate your concerns and solve the problem, as deemed necessary and prudent.

**Fair and Diverse Work Practices**

The Company considers a diverse workforce essential to our success as a world-class organization. We aim to hire, develop and retain the most talented individuals, regardless race, color, religion, religious creed (including religious dress and grooming practices), national origin, ancestry, citizenship, physical or mental disability,1 medical condition (including cancer and genetic characteristics), genetic information, marital status (including registered domestic partner status), sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), age (40 years and over), sexual orientation, veteran and/or military status, protected medical leaves (requesting or approved for leave under the Family and Medical Leave Act or the California Family Rights Act), domestic violence victim status, political affiliation, and any other status protected by local, state, or federal law.

Professional growth at Perfect Day is based on talent and performance. We are fully committed to offering equal employment opportunities and complying with the spirit and intent of all non-discrimination laws and fair workplace practices. It is strictly forbidden to retaliate against any person for presenting a discrimination or harassment allegation.

**Discrimination and Harassment**

The Company values a working environment where everyone is welcome and diversity in our employees is highly respected.

We prohibit discrimination, harassment and intimidation on behalf of or towards a supervisor, peer, client, supplier or visitor. Discrimination and harassment based on race, color, religion, religious creed (including religious dress and grooming practices), national origin, ancestry, citizenship, physical or mental disability,1 medical condition (including cancer and genetic characteristics), genetic information, marital status (including registered domestic partner status), sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), age (40 years and over), sexual orientation, veteran and/or military status, protected medical leaves (requesting or approved for leave under the Family and Medical Leave Act or the California Family Rights Act), domestic violence victim status, political affiliation, and any other status protected by local, state, or federal law, is wholly incompatible with our tradition and values of providing a work place characterized by respect, professionalism and dignity.
If you feel you are the subject of discrimination or harassment, or if you witness or receive a complaint of such type of conduct, you should bring these concerns to the attention of the People & Culture Team. In the event of discrimination by People & Culture, you should bring your concerns to the attention of the Chief Executive Officer. You may make reports or raise concerns regarding discrimination without fear of reprisal.

Full details about employee rights and investigation procedures are outlines in the Company’s Discrimination, Harassment, and Retaliation Prevention Policy, which is included in the Perfect Day Handbook. All reports will be treated discreetly to the extent possible. The Company will thoroughly investigate all harassment complaints and will take appropriate disciplinary measures up to and including termination of employment.

**Personal Conduct and the Workplace**

All employees are expected to behave appropriately and ethically while in the workplace or in the course of working for Perfect Day. Refrain from engaging in any activity that may call into question the Company’s compliance with legal regulations or its ethical standards.

The Company considers honesty to be fundamental for good business practices; therefore, it expects all employees will conduct their work activities with honesty. Dishonest acts include but are not limited to stealing, lying, forging documents (including documents used in employment application, expense reports, incident reports, etc.) or using Company funds for private use.

**Representing the Company with External Groups**

**We are responsible for our actions.**

**Fair and Equal Treatment**

The Company is committed to providing equitable treatment to its employees, customers, partners, suppliers, and competitors. The Company will not tolerate taking advantage of someone else through manipulation, concealment, and misuse of confidential information, false representation of relevant facts or other unfair treatment.

**Public Appearances and Media Interviews**

Publications, speeches, interviews, or public presentations before any media, as well as responses to questions from broadcast media on Company activities may only be carried out by representatives expressly authorized by the Marketing and Communications team, except in cases strictly related to the promotion and/or sale of products according to the Company’s normal course of business, in which responsible areas may participate.

**Relations with Suppliers**

The Company purchases all goods and services based on quality, price, availability, and service terms. Whenever the Company deals with its suppliers, transactions must adhere to usual market terms and specific policies and procedures in relation to the purchase of goods and services by the Company.

Providers of goods and services must comply with established policies and procedures, as well as agree to keep transactions with the Company confidential, unless disclosure has been approved by authorized personnel within the Company or legal requirements. Employees responsible for the relationship with a supplier may never mislead a supplier into thinking they may unduly influence a purchase decision for the Company. Regarding business offerings towards a supplier, Company employees may not offer nor suggest any business or service may be interrupted or granted in exchange for said business. **Real or apparent conflicts of interests must be avoided and proactively disclosed during the purchase process.** In cases of existing relationships that could cause a real or perceived conflict of interest, an
employee must disclose such relationships immediately, even if a commercial agreement is not currently in place.

Information related to purchases by the Company is confidential. It may only be shared internally with employees designated by authorized personnel and may not be shared outside the Company unless authorized.

Relations with Customers

Sales personnel, trade-marketing, special events and other employees work closely with existing or potential clients to understand the customer’s needs and gain their trust. It is common and appropriate for the Company’s employees to participate in recreational activities or social events hosted by a company with whom Perfect Day has an active or developing relationship, provided such activities are of modest value and appropriate taste.

Employees must behave transparently and honestly at all times when engaging in activities with customers in order to not violate any established guideline within this Code. If you are uncertain about the appropriateness of accepting, inviting, or participating in any event and/or activity with a customer, you should consult your immediate manager, department lead, or a leadership team member, as necessary, as to not violate any provision established by this Code.

Political Activity

Employees are free to participate in political activities outside of working hours and to provide contributions on their own initiative and behalf that they deem appropriate to political parties and/or candidates. You may not participate in political fundraising activities or other campaigns during work hours, nor use Company assets for said purposes and activities. Any evident and visible political activity that may lead someone to think that his/her actions reflect the Company’s points of view or position requires prior approval from the Chief Executive Officer.

Privacy/Confidentiality

Confidential or Secret Information

While you are working for the Company or after your time with the Company ends, you must protect the confidentiality of all the private or secret information you obtain or generate in relation to your activities within the Company.

“Confidential or secret information” is any type of non-public information, or information that has not been released to the public in general and that investors may deem important in decision making in regards to the purchasing or selling of any Company asset. It includes without limitation information regarding the development of systems, processes, products, know-how, and technology.

Confidential information will not be considered public until it has been publicly released (through relevant media for stock exchange and/or financial authorities) and after a period of time (usually at least a business day) to allow for said stock exchanges and/or financial institutions to communicate to the market, evaluate the information and inform public opinion.

You must not disclose any confidential or secret information on the Company or its employees, nor any confidential or secret information regarding a client or supplier to anybody (including other Company employees), if said persons are not authorized to receive it or do not possess the need-to-know of said information. The only exceptions are when the disclosure is authorized by the customer, the supplier, by any applicable law (i.e. regulatory authorities), by a pertinent legal procedure or by authorized personnel within the Company.

Confidential or secret information includes but is not limited to any system, data or process that grants the Company the opportunity to obtain any advantage over the competition, such as Company strategies or
projections, business plans, business processes and relations with customers, information received during business activities on employees, customers, suppliers and distributors, as well as information on technology, IT systems and products exclusive to the Company, plans on acquisitions or disposition of stock, assets, marketing campaigns, important contracts, expansion plans, financial operations and others.

You must take precautionary measures in order to avoid the disclosure of non-authorized confidential or secret information. You must guarantee that documentation related to said information is managed in a manner to minimize the risk of non-authorized persons having access to confidential or secret information. Ensure that access to work areas and computers is adequately controlled. Do not comment on confidential or secret matters in public places like elevators, hallways, restaurants, bathrooms and public transportation. Employees should be particularly vigilant about not displaying confidential information on computers while traveling on airplanes, trains and automobiles.

Take extreme care in commenting on said information by telephone or public address systems. Employees are not authorized to purchase or sell Company stock based on confidential or secret information obtained due to their position within the Company.

Private Information Regarding Stock Markets

Individuals who possess privileged information must refrain from performing any direct or indirect operation in stock markets that will be affected by said information. Likewise, they must refrain from communicating to third parties or recommending operations with said securities. Employees who come into possession of privileged information about another company while carrying out their responsibilities to Perfect Day must also refrain from performing any direct or indirect operation in stock markets that will be affected by said information.

In this Code, private information is all concrete information on one or several Company projects that has not been disclosed to the public and that may influence the prices of said securities.

Private Information Regarding Customers or Partners and Data Protection

The Company considers the privacy of our customers and partners to be of utmost importance. Therefore, it must be a top priority for all employees to keep information about our customers safe and to use it appropriately. You must always safeguard all confidential information that our customers and partners share with us.

You must also be sure to use our customers’ and partners’ information exclusively for the purpose for which it was collected, unless the law permits other uses.

Private Information Regarding Employees

The Company recognizes and protects the privacy and confidentiality of the employees’ employment records. Such records may not be shared outside the Company, except with the employee’s consent, or as required by regulations, standards and laws, or a summons or order issued by a court with jurisdiction.

Defend Trade Secrets Act Protection

An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is being made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law. An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal; and does not disclose the trade secret, except pursuant to court order.
Conflicts of Interest

We are judged by the transparency of our actions.

You must be cautious with regards to any activity, interest or relation that may interfere or appear to interfere with your capacity to act according to the Company’s and our customers’ and partners’ best interests. Furthermore, you may not obtain any inappropriate benefit derived from your position at the Company. It is impossible to describe all the possible instances of potential conflict of interest, so but employees are responsible for applying this Code, encouraging the use of good judgment, providing advice when required, and adhering to the highest ethical standards in conducting professional and personal matters. The following are just a few areas in which conflict of interest may arise, real or hypothetical.

Commercial Transactions with Third Parties

You must notify your immediate supervisor and People & Culture about any commercial relationship or business proposal the Company may have with any other company, customer or supplier in which you or a family member have direct or indirect interest (majority or minority owner, consultant, agent, family relationship, or similar), in which you can or may receive benefits and/or can influence in favor thereof. You are responsible for communicating to your supervisor this possible or potential conflict of interest.

Accepting Gifts, Loans and Other Benefits

In general terms, you may not accept gifts, loans, cash payments, payments for recreational activities or other benefits, nor the transfer of any valuable object from customers to suppliers, current or potential. In some situations, it may be permissible to accept gifts of nominal value (see additional detail provided below). You may never accept gifts under any circumstances where it may appear your professional ethics have been compromised. Do not accept or allow any close family member to accept gifts, services, loans or preferential treatment from third parties (customers, suppliers or others) in exchange for business relationships with the Company, past, present or future.

You may accept gifts provided they:

1. Are values at less than $100 and are not cash.
2. Do not compromise the Company or the employee if said acceptance is disclosed, nor can be interpreted to give the impression that non-ethical actions or any other actions that would violate this Code have taken place.
3. Are reasonable meals, or recreational activities in which the person that invites you is present, such as business meals or occasional sporting events, or;
4. Are not trips (local or abroad) or lodging of any kind. The employee must not accept these kinds of gifts, regardless of the purpose, for seminars or similar purposes.

Employees that receive business gifts for an amount greater than $100 during a calendar year and/or fiscal year, must report them to their manager immediately.

Gifts received that are not consistent with this Code will be evaluated by the Company to determine if they can be used internally, sold, or donated. Ownership and final disposition of these types of gifts will belong to the Company.

If you have questions on the acceptance criteria for gifts or invitations, please contact your manager.

Gift-Giving and Recreational Activities

If a gift can be interpreted as a bribe by others for an official favor or business, you MUST NOT offer the gift.
Duly authorized individuals may provide appropriate recreational activities to customers, in compliance with reimbursement requirements for applicable business expenses.

You may not offer, under any circumstance, any gift of value to a government official with the purpose of influencing the outcome of any official measure, or to induce them to perform business transactions in favor of the Company.

Investments

You must not make any personal investment in a company if said investment could affect or seem to affect your ability to make impartial decisions when conducting business on behalf of the Company. If you made such an investment prior to starting employment with the Company, or if your position within the Company changes in such a way that may cause conflict of interest, or seem that way, you must notify your manager and People & Culture. Investments subject to this disposition include those made in a company that is a competitor of the Company, or on the contrary, that does business or engages in any transaction with the Company.

External Commercial Activities

Due to possible conflict with the Company, or even the possible perception of a conflict of interest, the Company expects employees to notify People & Culture if they are interested in accepting a position as director, official, employee, representative, consultant or similar with an organization that may be considered a conflict of interest. If you are unsure as to whether the position would create a conflict, please contact People & Culture to discuss.

Use of the Company's Name, Facilities or Relations

You must not use the Company's name, facilities, or relations for personal benefit or external work. You may only use the Company's name, facilities or relations for charitable causes with prior authorization from the Chief Executive Officer.

Other Important Provisions

Anti-Trust Laws

The company complies with anti-trust laws designed to preserve competition among companies, as well as protecting consumers from unfair commercial practices and commercial agreements. Comply with these laws at all times.

Many situations create the potential for illegal anti-competitive conduct; therefore, such situation must be avoided. They include, but are not limited to:

- Competitor proposals to share information on pricing or other information on competitive marketing or to assign markets or consumers.
- Attempts from customers or potential customers to prevent the Company from doing business or sign contracts with another client.
- Participating in meetings with trade associations where sensitive matters are discussed from a corporate standpoint such as prices, pricing policies, costs and marketing strategies.

If a competitor or client attempts to discuss topics related to anti-competitive conduct, you must refuse to do so immediately. If necessary, abandon the meeting and communicate the action to your manager, People & Culture, or the Chief Executive Officer.

Commitment to the Environment and Occupational Safety

At the Company we conduct our business in a way that demonstrates our constant commitment to environmental and occupational safety of employees, customers and neighbors. Every employee is
responsible for knowing the applicable environmental and occupational safety standards for their job with
the internal policies and procedures related to their workplace. Risks and opportunities that may arise in
regards to environmental matters must be identified and handled according to applicable laws and
regulations, as well as internal policies.

The Company has developed a written Injury and Illness Program which is provided to employees upon
hire and which can be obtained by contacting Lab Services.

**Communication of Suspicious Activities and Money Laundering**

If you become aware of have evidence of suspicious money laundering activities, communicate it to your
manager, People & Culture or the Chief Executive Officer immediately.

**Code’s Implementation and Application**

Employees must read the contents of this Code and sign the Acknowledgement Form indicating they
have reviewed and understood it completely, requesting clarification if necessary. Employees’
acknowledgment of receipt will be verified and maintained by People & Culture and indicates an
agreement to comply with the spirit and intent of these guidelines. All real or potential conduct of an
employee which may be considered (or interpreted as) a violation to this Code, must be promptly reported
to your manager, People & Culture, or the Chief Executive Officer. The guidelines contained herein must
be applied in all the Company’s organizational levels, with equity and without prejudice, in conformity with
the obligations of the Company by law and according to the processes established herein.

The Company will take the necessary measures to protect the identity of any person reporting a possibly
violation, unless the Company deems necessary the disclosure of such information in order to comply
with legal proceedings, to perform an effective investigation, or to grant the accused due process. Perfect
Day will not retaliate against an employee who in good faith reports a violation of this Code. Any
employee who retaliates against an employee for making such a complaint will be subject to discipline, up
to termination of employment.

The violation of any general ethical conduct guideline and/or any disposition indicated in this Code is
strictly prohibited, and violations will be punished according to local laws and work guidelines. If
necessary, legal actions may be taken in order to recover any inappropriate expense, profit obtained by
the offending employee or any financial damage suffered by the Company, when permitted by law.

It is each employee’s responsibility to promptly inform their manager, People & Culture, or the Chief
Executive Officer when a change in investments or relationships occurs with customers, partners,
suppliers or banks that have or may have commercial relations with the Company. If this occurs, a
“Conflict of Interest(s) Disclosure” form must be completed and sent to the abovementioned personnel
immediately.

**Reporting Concerns**

All employees are encouraged to discuss with their manager any questions, concerns or complaints in
relation to the following topics:

- Any topic related to financial, accounting or internal control reports.
- Any circumstance in relation to an employee, customer, partner, supplier or in general, which may
  be considered or interpreted as a violation to this Code or any law.
- Any human resource matter related to sexual or occupational harassment or discrimination.

If an employee considers that their supervisor has handled their concern inappropriately, they should
communicate the situation to People & Culture or the Chief Executive Officer. However, if the employee
does not feel comfortable communicating with these parties, they may communicate through our third-
party anonymous hotline at [www.lighthouse-services.com/perfectdayfoods](http://www.lighthouse-services.com/perfectdayfoods) or (855) 650-0005.
Discipline
A breach of the provisions contained in this Code may result in disciplinary action up to and including termination of employment. For Leadership Team members, appropriate disciplinary actions may be determined in coordination with the Board of Directors.
Acknowledgement of the Code of Ethics & Business Conduct

I acknowledge receipt of a copy of the Code of Ethics and Business Conduct (the “Code”) of Perfect Day (the “Company”). I have read it and had the opportunity to ask questions regarding guidelines and directives contained in this Code, as well as to consult or comment with regards to any doubts involving said guidelines and directives.

I acknowledge that a copy of the Code is available in Namely, freely accessible to all Company employees and which can be consulted, analyzed, and reviewed at any moment.

I understand that it is my responsibility to observe, apply, and follow all the guidelines and directives set forth in this Code, as well as the specific policies and procedures published and authorized by the Company, including those outlined in the Perfect Day Handbook.

I understand that the Code is meant as a guide and does not intend to cover in detail all matters contained herein with regards to ethical situations and commercial conduct in business for the Company. However, I understand it is my duty and responsibility to seek advice and direction regarding any ethical matter I may encounter and/or have knowledge of and of which I have doubts, from my immediate manager, department head, People & Culture, Leadership Team, Chief Executive Officer, or our third-party anonymous hotline at www.lighthouse-services.com/perfectdayfoods or (855) 650-0005.

I understand that the Company has the right to modify, amend, or eliminate, in part or in whole, the integral guidelines detailed in this Code, at any moment, with immediate notification to its employees.

I understand that I must notify the Company of any investment, relationship and/or contact with a client, partner, supplier, financial entity and/or company where I have or could have a conflict of interests. If such an investment, relationship or contact exists, I understand that I am expected to disclose the details of the investment relationship and/or contact to People & Culture. A “Conflict of Interest(s) Disclosure” form will be provided for this purpose when required. If no conflict of interest is stated, I assume any future liability for lack of notification and disclosure, pursuant to the provisions contained in this Code.

Name:

Signature/Date:
# Conflict of Interest(s) Disclosure

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Type of relationship (a)</th>
<th>Shareholding % (b)</th>
<th>Type of activity and/or service (c)</th>
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<td><strong>Financial Entity</strong></td>
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</table>

(a) Indicate type of relationship with this company, individual, or organization, such as: majority owner, minority owner, consultant, agent, family relationship, tradition or other that implies an approach and/or possible conflict of interests.

(b) If a majority owner or other, indicate the shareholding percentage in the company.

(c) Indicate the type of activity and/or service rendered or to be rendered by the company, individual or organization.

Name:

Signature/Date: