



PawCo Foods Code of Conduct and Ethics

Introduction

At PawCo Foods, we are committed to maintaining the highest standards of ethical conduct and integrity in all our business practices. This Code of Conduct and Ethics outlines the principles and guidelines that all employees, contractors, suppliers, and business partners must follow to uphold our values and ensure a positive and respectful workplace.

1. Compliance with Laws and Regulations

- **Legal Compliance:** All employees must comply with all applicable laws, regulations, and company policies. Ignorance of the law is not an excuse for non-compliance.
- **Reporting Violations:** Employees are encouraged to report any suspected violations of laws, regulations, or company policies to their supervisors or the Human Resources department.

2. Integrity and Honesty

- **Truthfulness:** Employees must act with honesty and integrity in all business dealings. Misrepresentation or deceitful conduct will not be tolerated.
- **Transparency:** All communications, both internal and external, should be clear, accurate, and truthful.

3. Respect and Dignity

- **Non-Discrimination:** We are committed to providing a work environment free from discrimination and harassment. Discrimination based on race, color, religion, gender, national origin, age, disability, sexual orientation, or any other characteristic protected by law is strictly prohibited.

- **Harassment:** Harassment of any kind, including sexual harassment, bullying, or any other behavior that creates a hostile work environment, is not tolerated.

4. Fair Labor Practices

- **Child Labor:** PawCo Foods does not employ children under the legal minimum age and strictly prohibits the use of child labor in our operations and supply chains.
- **Forced Labor:** We do not tolerate any form of forced, bonded, or compulsory labor.
- **Fair Wages and Compensation:** Employees are compensated fairly and in accordance with local laws and regulations.

5. Health and Safety

- **Workplace Safety:** We are committed to providing a safe and healthy work environment. Employees must adhere to all safety protocols and report any unsafe conditions immediately.
- **Wellness Programs:** PawCo Foods promotes health and wellness programs to support the physical and mental well-being of our employees.

6. Environmental Responsibility

- **Sustainability:** We are dedicated to sustainable practices and minimizing our environmental footprint. Employees are encouraged to participate in initiatives that promote environmental sustainability.
- **Compliance:** Adhere to all environmental laws and regulations and strive to reduce waste and energy consumption.

7. Confidentiality and Data Protection

- **Confidential Information:** Employees must protect confidential company information and not disclose it to unauthorized parties. This includes proprietary information, trade secrets, and personal data.
- **Data Security:** Ensure that all data, including personal and financial information, is handled securely and in accordance with data protection laws.

8. Conflicts of Interest

- **Disclosure:** Employees must disclose any potential conflicts of interest to their supervisor or HR. This includes any outside activities, financial interests, or relationships that may interfere with their duties.
- **Avoidance:** Avoid situations where personal interests could conflict with the interests of PawCo Foods.

9. Anti-Bribery and Corruption

- **Prohibition:** Bribery and corruption in any form are strictly prohibited. Employees must not offer, give, or receive bribes or other improper payments.
- **Gifts and Hospitality:** Employees must not accept or offer gifts or hospitality that could influence business decisions or create a conflict of interest.

10. Respect for Human Rights

- **Human Rights:** Uphold and promote human rights as outlined in international standards and agreements. Ensure that all business practices respect the dignity and rights of individuals.
- **Stakeholder Engagement:** Engage with stakeholders to address any human rights concerns and promote ethical practices throughout our operations and supply chains.

11. Right to Organize

- **Freedom of Association:** Respect the right of employees to form and join trade unions and to bargain collectively.
- **Right to Strike:** Recognize and respect the legal right of employees to strike, in accordance with applicable laws and regulations.

12. Reporting and Whistleblowing

- **Whistleblower Protection:** Employees who report unethical behavior or violations of this Code in good faith will be protected from retaliation.
- **Reporting Channels:** Reports can be made confidentially to the HR Manager, Nakisa Azizi (nakisa@mypawco.com), or through our general inquiries email (help@mypawco.com).

13. Accountability and Enforcement

- **Responsibility:** All employees are responsible for understanding and adhering to this Code of Conduct and Ethics.
- **Consequences:** Violations of this Code may result in disciplinary action, up to and including termination of employment.

Conclusion

PawCo Foods is committed to maintaining a culture of ethical behavior and integrity. By adhering to this Code of Conduct and Ethics, we ensure that our business practices reflect our core values and contribute positively to our employees, customers, and the communities we serve. If you have any questions or concerns regarding this Code, please contact the Human Resources department.

PawCo Foods Code of Conduct and Ethics Year Plan

Objective

To continuously improve and uphold high standards of conduct and ethics within PawCo Foods, fostering a culture of integrity, accountability, and respect throughout the organization.

Quarterly Plan

Q1: January - March

1. Ethics and Compliance Training

- o Develop and launch a comprehensive ethics and compliance training program for all employees.
- o Conduct initial training sessions focusing on the company's Code of Conduct, anti-bribery, and anti-corruption policies.
- o Establish a schedule for regular refresher courses.

2. Employee Handbook Review

- o Review and update the employee handbook to reflect current ethical standards and conduct policies.
- o Ensure all employees receive the updated handbook and acknowledge its receipt and understanding.

3. Establish Ethics Committee

- o Form an Ethics Committee responsible for overseeing the implementation and adherence to the Code of Conduct and Ethics.
 - o Schedule regular meetings to review ethical concerns and provide guidance on ethical issues.
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Q2: April - June

4. Conflict of Interest Policy

- o Develop a conflict of interest policy that outlines the process for disclosing and managing conflicts.

- Train employees and management on identifying and reporting conflicts of interest.
 - Implement a system for regular disclosure and review of potential conflicts.
- 5. Whistleblower Program**
- Establish a confidential whistleblower program to encourage reporting of unethical behavior without fear of retaliation.
 - Promote the program through internal communications and training.
 - Ensure all reports are investigated promptly and thoroughly.
- 6. Vendor and Supplier Code of Conduct**
- Develop and communicate a Code of Conduct for vendors and suppliers, outlining PawCo Foods' ethical standards and expectations.
 - Conduct training sessions for key suppliers on compliance with these standards.
 - Implement a process for regular auditing of suppliers' adherence to the Code of Conduct.
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Q3: July - September

- 7. Promoting a Respectful Workplace**
- Launch a campaign to promote a respectful and inclusive workplace culture.
 - Conduct training sessions on diversity, equity, and inclusion.
 - Develop and implement policies to address and prevent workplace harassment and discrimination.
- 8. Environmental Responsibility**
- Integrate environmental ethics into the Code of Conduct, emphasizing sustainable practices and environmental stewardship.
 - Train employees on PawCo Foods' sustainability goals and their role in achieving them.
 - Monitor and report on the company's environmental performance.
- 9. Ethical Decision-Making Framework**
- Develop an ethical decision-making framework to guide employees in resolving ethical dilemmas.
 - Train managers and supervisors on using this framework in their decision-making processes.
 - Encourage employees to seek guidance when faced with ethical uncertainties.
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Q4: October - December

10. Annual Ethics Survey

- Conduct an annual ethics survey to gauge employees' understanding and perception of the company's ethical standards.
- Analyze survey results to identify areas for improvement.
- Develop action plans to address any identified gaps or concerns.

11. Recognition and Rewards Program

- Implement a recognition and rewards program to acknowledge employees who demonstrate exemplary ethical behavior.
- Publicize success stories and best practices within the company to reinforce ethical conduct.
- Encourage peer nominations and feedback.

12. Review and Update Policies

- Conduct a comprehensive review of all conduct and ethics policies to ensure they remain current and effective.
 - Update policies as needed based on changes in laws, regulations, and best practices.
 - Communicate any changes to all employees and provide training on new or revised policies.
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Conclusion

By following this strategic year plan, PawCo Foods aims to foster a culture of integrity and ethical behavior throughout the organization. Continuous improvement in these areas will help maintain trust, promote a positive work environment, and ensure compliance with all applicable laws and regulations. Regular monitoring, training, and engagement will support our commitment to the highest standards of conduct and ethics.