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## Our Code of Conduct: Pacific Coast Fruit Products

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Our code of conduct outlines Pacific Coast Fruit Products expectations and guiding principles for appropriate workplace behaviours. It serves as a framework for ethical decision making by “painting a picture” of how employees are expected to work and how employees can expect to be treated in our workplace. In its simplest form, the underlying expectations of our Code of Conduct is to follow the golden rule and “treat others as you expect to be treated.”

While it is not possible to describe all unethical, illegal or prohibited behaviours in detail, our Code of Conduct outlines basic fundamental expectations and principles to guide your conduct at PFCP. Employees are expected to do what’s right, use good judgment, apply common sense and comply with company policies, applicable laws, regulations and contractual obligations.

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### Behaviour’s We Value

Our values guide our behaviours and underline how we work with each other; they are the foundation for shaping our company culture. We are expected to adhere to our values in the face of all obstacles.

*Invest in* **RELATIONSHIPS** – we build trust and collaborate to develop long term partnerships.

*Act with* **INTEGRITY** – we are transparent, honest and ethical in all of our interactions.

*Excel at* **SERVICE** – we set the standard for delivering exceptional experience.

*Deliver* **EXCELLENCE** – we aspire for Excellence in everything we do

### Our Mission

To serve global customers honestly and knowledgeably. To support and develop our local and international agri-food suppliers in sustainable agriculture practices, food safety and quality initiatives and social responsibility.

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### Questions, Ethical Issues or Possible Code Violations

If you have questions or concerns about a possible breach of our Code, interpretation of policies, an ethical concern or if you believe a violation has occurred, you are expected to inform your manager, Human Resources, Ownership or the CEO. In doing so, the company is committed to protecting your interests and your integrity. It is our expectation that all concerns be brought forward in good faith.

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### Setting the Tone

All employees are accountable for adhering to our Code of Conduct. Owners, the CEO, Managers and Supervisors have the added responsibility of creating an open and supportive environment where employees feel comfortable asking questions, raising concerns and reporting misconduct.

# Maintaining an Inclusive & Healthy Work Environment

## Obey the Law

The obligation we all have, is to obey and comply with the laws, rules and regulations of every community, government and country where we do business. The expectation we have of employees is to ensure that we comply with all laws and legal requirements in the course of our business. It is our collective responsibility to know and adhere to the laws relevant to our specific role or business unit, Province, State or Country to ensure we are not putting the company, our peers, ourselves and our customers at risk.

## Company Policies, Procedures and Rules

We must also follow and adhere to company policies, procedures and rules including those specific to our business unit and those that apply company-wide. Like society, every company has set policies, procedures or rules that some employees won't like. While we welcome feedback and provide vehicles for you to voice opinions and concerns as well as influence change, adherence to business unit and company policy must be resolute.

## Diversity & Equal Opportunity Promise

We are committed to promoting an inclusive and diverse organization. Our goal is to attract, develop and retain a highly qualified, diverse, skilled and knowledgeable workforce and to fully comply with laws of equal opportunity without regard to race, colour, religion, age, gender, sexual orientation, gender identity, national origin, disability, marital status or any protected ground or category under applicable provincial or federal laws.

## Discrimination and Harassment

We have zero tolerance for discrimination, sexual harassment, bullying and other forms of harassment or for any behaviour that violates any protected ground or category under applicable provincial or federal laws. *Reference: Harassment Policy & Complaint Procedure*

## No Forced or Child Labour

The Company is opposed to all forms of modern slavery, including forced labor and child labor, and is committed to ensuring it does not take place anywhere within its business activities. The Company expects its suppliers and other business partners to share this commitment. You must follow the Company's policies and practices concerning the identification of risks related to modern slavery before entering into any contractual relationships with suppliers. If you identify any risks, you must consult with your manager before proceeding. *Reference: Statement on the Prevention of Modern Slavery and Human Trafficking.*

## Violence

Threatening, hostile, violent or abusive behaviours in the workplace, on company property, at company events and during an employee's personal time where employees believe they are in danger from a peer or acquaintances of a peer will not be tolerated. Conduct of this nature will be treated with immediate and appropriate action against offenders including possible termination and criminal prosecution. *Reference: Health & Safety Policy*

## Questions Or Concerns?

Reports and complaints will be kept confidential to the extent permitted by law and by the companies need to investigate the situation.

PCFP prohibits retaliation against employees who submit or participate in the investigation of any complaints. *Reference: Employer Disclosure Policy*

## **Workplace Safety**

We take workplace safety very seriously and to this end we work diligently to employ safe work practices and deliver extensive safety training in compliance with legislative expectations. Employees are expected to do their part by performing work in a safe and responsible manner, by complying with all safety policy expectations and reporting any concerns, including violations with safety protocol. *Reference: Health & Safety Policy*

## **Use of Social Media**

Employees are reminded that the use of social media such as but not limited to Facebook, X (formerly Twitter) and Instagram to perpetuate hate directed toward co-workers or publicly embarrass, threaten, harass or intimidate co-workers is a form of harassment which the company will not tolerate. Appropriate steps will be taken to investigate these types of situations with the company treating this behaviour in line with our Harassment Policy.

## **Substance Abuse, Illegal Drugs & Controlled Substances**

While on company premises, during working hours at one of our facilities, while on business travel or while operating company equipment or rental vehicles, employees may never use, transfer, sell, manufacture or possess illegal drugs, or controlled substances such as alcohol or drug paraphernalia. Employees who report to work under the influence of any legal or illegal drug or who appear to be under the influence of any substance causing concern for their personal safety or the safety of others will not be permitted to work.

## **Alcohol & Cannabis**

Employees may not possess or be under the influence of alcohol or use cannabis while on company property, while in a company vehicle or while conducting business. The only exceptions are for functions where alcohol may be served (such as customer events) or, in the case of medicinal cannabis, with permission based on a medical accommodation. The expectation is that consumption is voluntary, is in moderation, not to excess or in a manner that would otherwise affect the employee's ability to perform their job or otherwise affect the company's business interests. Consumption of alcohol or cannabis while driving or driving under the influence is prohibited at all times.

## **Solicitation and Fundraising**

Employees often reach out to their peers when they are fundraising for a personal cause. While fundraising is an honorable effort, solicitation and fundraising can be construed as coercive especially when there are power dynamics in a working relationship such as Manager and direct report.

Employees who choose to fundraise may post information asking for donations on notice boards in the lunchroom at each of our facilities with approval from Human Resources. Company-wide email distribution soliciting donations is not permitted.

On behalf of the company, PCFP does sponsor numerous charitable events throughout the year, and we may organize company fundraising efforts for specific causes and purposes.

## **Employee Privacy**

Employees need to take appropriate steps to protect confidential personal employee information. We adhere to our Privacy Policy and expect employees to comply in this regard. Employees who have no business reason to do so may not access or share personal information such as phone numbers, addresses, birthdates, bank accounts, employee files etc. Only those who have permission based on business need, such as Payroll Administration, may access and share such information in the course of doing business. We treat personal information very seriously and disclosing this information is strictly prohibited. *Reference Privacy Policy Employee Handbook*

## Monitoring Systems & Devices

In order to protect company assets and to ensure a safe workplace, employees must understand that electronic communication, company computers and your company email remain the property of the company. PCFP can monitor devices, computer systems and networks including the use of the internet and email accessed from company devices or systems.

Video surveillance systems are used in our facilities to ensure a safe workplace, to protect our employees and our customers.

Personal recording devices (cameras, cell phones) may not be used in the facility to take pictures of our manufacturing process, technology, financial information, or any business-related activity without permission from the employee's manager. Guest to our facility are not permitted to use recording devices to take pictures without the prior approval by the Business Unit Manager.

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## Maintaining Integrity

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Our reputation is highly dependent on the actions of our employees therefore it is necessary to avoid perceived or potential conflicts of interest.

**Gratuities / Perquisites** Occasionally business partners, suppliers, service agencies, current and potential customers offer or give employees a form of gratuity such as gifts, money, gift cards, trips, meals, special favors, concerns or sports tickets. As a general guideline we expect employees to use sound judgment when accepting gifts.

- Entertaining customers with meals and events must be balanced. Accepting invitations must not compromise the integrity of the business relationship and is to be done using reasonable judgment with disclosure on all expense reporting.
- Acceptance of all gifts needs to be disclosed to your immediate manager. Gifts such as gift cards, general items, gift baskets and personalized items to a reasonable amount not exceeding an approximate value of \$50, with disclosure, may be accepted. However, as a general rule, gift giving items are shared with the organization and re-distributed in the form of draws. Contact Human Resources for further information in this regard.
- Concerts, sports events and other special event tickets must be declared to your manager for approval. When offered these types of tickets it's important to determine if it is more appropriate to share with the rest of the organization (a draw) or if they are identified for a specific employee because of the business relationship. This will determinate whether the tickets are accepted, raffled, given to another employee or declined.
- Gifts or services must never be explicitly solicited.

## Giving Gratuities & Donations

Any financial donation made to a specific event such as a customer or business partner charity requires approval by the Controller and the CEO. We do not solicit financial donations from our customer or supplier partners.

## Loans

The use of company credit cards for personal purchases or payments is not permitted. In the event a company credit card is used in error, the employee needs to disclose the transaction immediately to their Manager and Human Resources to make arrangements for reimbursement.

## **Procurement**

Our procurement objective is to purchase materials, supplies and services in the best interest of our company and our customers while maintaining good supplier and community relations. To the maximum extent possible our procurement practices are based on competitive bids. Employees may not seek to profit from any bid financially or in the form of gifts. Employees are prohibited from soliciting favors or contributions from suppliers.

Employees who make company purchases are to comply with all company policies, ensure proper signing authority, use the company purchase order system and can purchase to the limits provided by the finance department.

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## **Protecting Our Company Reputation**

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### **We make safe, quality food.**

Every decision we make must support our first commitment – to make safe, quality food. Customer, employee and government confidence must be unwavering in this regard. Employees are to ensure that all activities are aligned with this commitment and recognize that there is no room for compromise or complacency when it comes to the safety of our products. Confidence in producing safe food is built on trust and reputation. A damaged reputation and lack of consumer confidence can devastate a business. Any concerns with food safety must be treated with the highest sense of priority and urgency. Employees who have concerns about food safety are to immediately bring them to the attention of a Manager.

### **Record Keeping**

All records kept at PCFP whether financial, employment, quality control or productivity, to name but a few, must be created accurately and be reflective of the true nature of the transaction or activity that is being recorded. Records may be corrected when errors are noted, however records must not be misleading or contain errors or knowingly inaccurate information. It is never appropriate to tolerate the falsification or improper alteration of records.

### **Safeguarding Company Information**

Employees ought to reasonably know what information is to be protected and what is not to be shared publicly or to competitors. Intellectual property rights, technology, recipes, sales information, pricing, vendors, meeting minutes, customer lists, employee lists, employee records and personal data are examples of information that is not for public knowledge. If you are unsure whether information you have been asked to share (in any form) is confidential or not, seek approval from your Manager first.

Printed confidential and personal company information is to be disposed of by shredding.

### **Company Equipment & Property**

Protecting PCFP's tangible and intangible property and any property entrusted in an employee's care is expected. Company property and the property of co-workers, customers and business providers is not to be taken, loaned or given away or otherwise disposed of regardless of its condition or value without authorization. Company items being removed from the company require written Manager approval prior to being taken.

### **Healthcare Plans & Company Benefits**

Healthcare plans and company benefit programs are provided as compensation and are to be used in an honest manner. Employees may not misrepresent health status, dependent coverage, beneficiaries or any other facts including reasons for absence in order to claim benefits to which you or others are not entitled or eligible. Employees who claim a Workplace Injury must do so in an honest manner and are expected to comply with injury reporting protocol, participate in and follow return to work programs and commit to a program of care.

## **Work Time**

Employees are to keep accurate records of their time worked and or complete accurate records of time worked including proper use of time clocks for record keeping. Overtime is approved prior to working and is to be recorded and approved by your Manager or Supervisor for payroll processing. Employees who have concerns about reporting, accuracy of wages, deduction from wages or errors are to raise their concerns immediately with Human Resources or their manager.

## **Protecting Company Communication & Information Systems**

Communication and information systems including company computers and mobile devices are provided to employees to conduct company business and are valuable assets to be protected by employees. Employees are to use good judgment to protect company information and data from accidental or unauthorized disclosure, misuse, improper alteration or destruction. Limited personal use of communication equipment is permissible as long as it doesn't interfere with work responsibilities or business operations, incur costs or violate the law.

Employees need to protect the security of any identification access numbers, user ID or passwords used for accessing computers, networks, applications or communication devices. Only approved and properly licensed software is to be used on company systems and is subject to applicable software license agreements.

## **Prohibited Activities**

Facilities and company technology such as email, instant messaging, internet and intranet are prohibited from being used for activities that are unlawful, violate company policies and should be used based for all activities based on reasonable judgment. Examples of inappropriate use include:

- Pornographic, obscene, offensive, harassing or discriminatory content
- Chain letter, pyramid schemes or unauthorized mass distributions
- Gambling and games
- Large personal files containing graphic material
- Malicious software
- Pyramid Schemes

## **Handling External Communications**

Unless employees receive prior approval, employees are not to suggest that they are speaking on behalf of PCFP when presenting personal views. Use of company brand and logo is for business purposes. Request to use the company logo are to be made through the Sales department.

- Media Inquiries are to be directed to the company CEO.
- Public Service, Police or Legal Inquiries are to be directed to Human Resources, a senior leader or the CEO
- Human Resources issues such as inquiries regarding current or former employees including employment verification, verbal or written reference are to be directed to a Manager in Human Resources.

## **Personal Working Relationships**

We understand that co-workers quickly become a community of friends, and employees may establish dating relationships with a coworker. While we trust and expect employees to exercise good judgment when engaging in dating relationships with other PCFP employees, all staff need to recognize that some relationships are not appropriate.

As a general, rule employees may not supervise someone who they are romantically involved or if they are immediate family. Romantic relationships between co-workers who are peers or where neither party supervises or exercises authority over the other are generally acceptable. This type of relationship must be consensual and workplace behavior

cannot have a negative impact on the working environment or create a potential conflict of interest. If concerns arise, PCFP may transfer or reassign one or both employees if possible or take other appropriate steps to address the situation within reason.

Romantic relationships between an employee who is a manager, leader, or has a position in which they exercise authority or supervision (whether directly or indirectly) over the other employee involved, and/or are within the same functional group are, as a general rule, prohibited. These relationships may compromise the Manager (or leader's) ability to perform their job responsibilities, or create the perception that such performance is compromised. In particular, such behavior could place you as a manager, the employee, and other members on your team in an uncomfortable or conflicted position.

In these circumstances, both parties are required to notify Human Resources and their direct Manager promptly when starting any such relationship. PCFP may require the transfer or reassignment of one or both of the involved employees, change their positions, or take other appropriate steps to address the situation within our business means. PCFP takes these issues very seriously, and may be required to terminate employment of both individuals based on any actual or potential conflict of interest.

#### **Employment of Relatives:**

Relatives of employees may be eligible for employment with PCFP if the individuals are not in positions where they exercise authority or supervision (whether directly or indirectly) over the other relative, are not reporting to the same manager, and are not in positions where a conflict of interest could arise. For the purpose of this policy PCFP defines "relatives" as spouses, domestic partners, children, siblings, parents, in-laws, and stepfamily. Exceptions will be made for short term contract work such as maternity leave, medical leave, leaves of absence, Fresh Pack seasonal work.

The intent of this policy is forward looking and is not intended to make any changes to current situation where an employee is currently reporting to a relative. However, should issues prove out that favoritism, conflict or personal gain are evident, these situations will be addressed accordingly which may require internal movement (where possible) or release of employment. Relationships, in conflict with this policy or purposefully hidden will result in an investigation with the potential of termination of employment.

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#### **In Summary:**

1. We have work because customers value what we do. To ensure our relevance in the market place we must run our business with the highest regard for integrity and ethics. Our Code of Conduct starts with our employees. Being Accountable; assume personal responsibility for our actions, for shaping our work place and achieving our results.
  2. It is not possible to describe in detail all unethical or illegal business practices. Common sense, a commitment to comply with company policies and procedures, adherence to public law and disclosure of known or suspected wrongdoing is the best guideline we can provide for employees to follow. Seek guidance if you are unsure what to do and ask questions until you are satisfied you have the answers to the questions you seek.
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# Employee Agreement

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Employees are required to read PCFP Code of Conduct and confirm that they understand and commit to adhering to the principles and expectations outlined.

It is further understood that if there are any doubts or concerns, at any time, about the expectations outlined, employees are to bring this concern to their manager, a senior leader or company owner.

Failure to comply with this Code may result in investigation and disciplinary action up to and including termination

Date: \_\_\_\_\_

Employee Name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

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Signing this document confirms you have read the Code of Conduct that you understand and commit to the expectations outlined. Further, you are confirming that you have received a copy of PCFP Code of Conduct for your reference.

## The Headline Test

“Before I make a decision, I consider how it would look in a news story?”

### Ask Ourselves:

What the impact would be if the conduct or actions become public or were viewed by friends and peers we respect. If uncomfortable with the answer, don't do it.

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## Our Commitment

PCFP is committed to adhering to our Core Values and our Code of Conduct in all that we do. This commitment is part of what ensures we are a trusted employer and supplier to our customers.

In keeping with this commitment, all employees are required to understand and comply with our values and our Code of Conduct.

If in doubt, ask.

This document is intended to meet Provincial and or Federal laws. In the event of an error, the company is committed to adhering to applicable laws and legislation.

Revised: Human Resources

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