

SUPPLIER CODE OF CONDUCT

One of HMSHost Corporation and its subsidiaries and affiliates' (collectively, "HMSHost") most important core values is ethical conduct - acting fairly and honestly in all dealings with our employees, our suppliers, and our customers. As part of our business operations, we partner with vendors, suppliers, contractors, and other entities, (collectively, "Suppliers"). In order to ensure that Suppliers adhere to our standards of ethical business practices, HMSHost requires its Suppliers to follow this HMSHost Supplier Code of Conduct (the "Code").

Supplier will ensure disclosure of relevant parts of this Code to its employees, agents, subcontractors and suppliers (if appropriate), and agrees its employees and its subcontractors and suppliers (if appropriate) will comply with all material aspects of this Code that are relevant to the party's agreement(s) with HMSHost and to HMSHost and Supplier's business relationship. Supplier further agrees to immediately report issues it becomes aware of that could negatively affect the quality of HMSHost's products or services or public perception of HMSHost in any way.

Legal compliance

Supplier shall comply with all applicable international, federal, state, local, and industry laws and regulations and normal industry standards of the countries in which they operate. HMSHost has the right to verify compliance with applicable laws and this Code. If there is an inconsistency between the law and this Code, Supplier shall meet the higher standard that applies to such conduct.

Anti-bribery and anti-corruption

Supplier shall not engage in bribes, kickbacks, fraud, embezzlement, extortion, money laundering, or any form of corruption. In order to ensure that Supplier does not engage in any form of corruption, it must have robust anti-corruption policies and controls in place. Supplier will comply with all applicable anti-corruption and anti-terrorism laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act Of 2010.

Human rights

Supplier shall utilize employees whose presence in the workplace is voluntary. Supplier shall adhere to all applicable employment laws and shall not engage in child labor (i.e., labor from persons under 15 years of age that interferes with their physical or mental development or schooling), forced labor, or human trafficking. Supplier shall ensure that no underage labor, forced labor or human trafficking has been involved in the production or distribution of its goods or services.

Health and safety

Supplier shall provide a healthy and safe workplace environment and shall take effective steps to prevent, minimize, or eliminate potential hazards leading to harm. Health and safety risk assessments shall be conducted to identify and then address potential hazards. Supplier shall meet or exceed applicable laws and industry standards in this area.

Respect and anti-discrimination

Supplier shall treat all employees with respect, and shall not engage in or allow any behavior that is threatening, physically or mentally abusive, exploitative, or sexually coercive. Supplier shall not engage in, permit or support discrimination based on race, color, creed, age, religion, gender, sexual orientation, national origin, disability, veteran status, or union membership.

Wages and benefits

Supplier shall meet or exceed applicable laws and industry standards regarding wages, benefits, working hours and other elements of compensation and employee benefits. Supplier must have a system in place to verify and accurately record payroll, deductions and hours worked by employees.

Freedom of association and collective bargaining

Supplier shall adhere to applicable laws regarding the right of employees to affiliate with lawful organizations without interference.

Environment

Supplier shall meet applicable environmental laws and industry standards. Supplier shall include the goal of decreasing its environmental impact as a consideration in business decisions, including its own supply chain. Environmental impact includes but is not limited to: greenhouse gases or other forms of air pollution; water pollution; solid waste; toxins; depletion of freshwater, topsoil, or other natural resources faster than replenishment rates; and damage to natural ecosystems. Methods of reducing environmental impact include but are not limited to: using pollution control technologies, renewable energy, products that increase energy efficiency, recycled products, and products made from reused or recycled materials.

Quality

Supplier shall meet or exceed applicable laws and standards regarding quality, food safety, and good manufacturing practices. Supplier will adhere to any product specifications agreed upon by the parties in writing. Supplier must be capable of tracing its source of supply at least one level back in the supply chain and will have a documented recall process.

Record keeping

Supplier shall maintain financial, operational and business records in accordance with all applicable legal requirements and generally accepted accounting practices. Upon request, supplier will provide HMSHost with non-financial key performance indicators relevant to this Code of Conduct, for example, if maintained, its records of diversity (for instance, age, gender, or educational and professional backgrounds), the objectives of its diversity policy, how it has been implemented and results, and other activities within the Supplier's company or within local communities.

Reporting concerns

Supplier shall have or will establish a procedure for employees to safely report unethical actions regarding the workplace, and shall not discipline or discriminate against employees reporting unethical actions.