



Code of Conduct

The Way We Do Business





At McCain Foods, we believe that the way we act is part of what makes us unique. We act as a global family who believe that good ethics is good business, and our values guide our decisions everyday.

Our Code of Conduct provides guidelines for conducting business in a way that aligns with our McCain Rising Star. As a family owned, private company, we pride ourselves on incorporating our family values into our business operations. Our values in action have differentiated McCain Foods in the market, earning the Company and our people a reputation for commitment, authenticity and trust. How we act on a day-to-day basis is what defines and maintains our reputation and it is our duty to protect that reputation.

By adhering to the Code and holding ourselves to the highest standards, we will continue to grow as a strong global brand and be well positioned to achieve our vision and be the world leader in prepared potato and appetizers.

If you find yourself in a difficult position that you believe is inconsistent with our Code, it is important to have the courage to make the right decision. The Code will help lead you to the right decision or the right people to help.

Max Koeune
President and CEO, McCain Foods Limited



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The Way We Do Business



What is Expected of You
The Code and the Law
Your Accountability
Understanding the Code

The McCain Code of Conduct illustrates how our values and our commitment to lawful and ethical conduct, in all our affairs, guides our decision making. It provides examples of situations we may encounter in our daily life, and explains the standards of behaviour that McCain Foods expects of all employees of McCain Foods Limited, as well as its direct and indirect subsidiaries.

No matter where we work, honesty, integrity and fairness are the basis for a sound business reputation.

What is Expected of You

To preserve the reputation of McCain Foods, we must all be guided by our Rising Star. Our Rising Star helps us uphold our values, every day, no matter our role, function, or location. We achieve this when we abide by the principles of the Code.

We also have a duty to help other employees understand and comply with the Code, and to report possible violations as soon as they occur or as we become aware of them.

Compliance with the Code is a term of every employee's employment with McCain Foods.

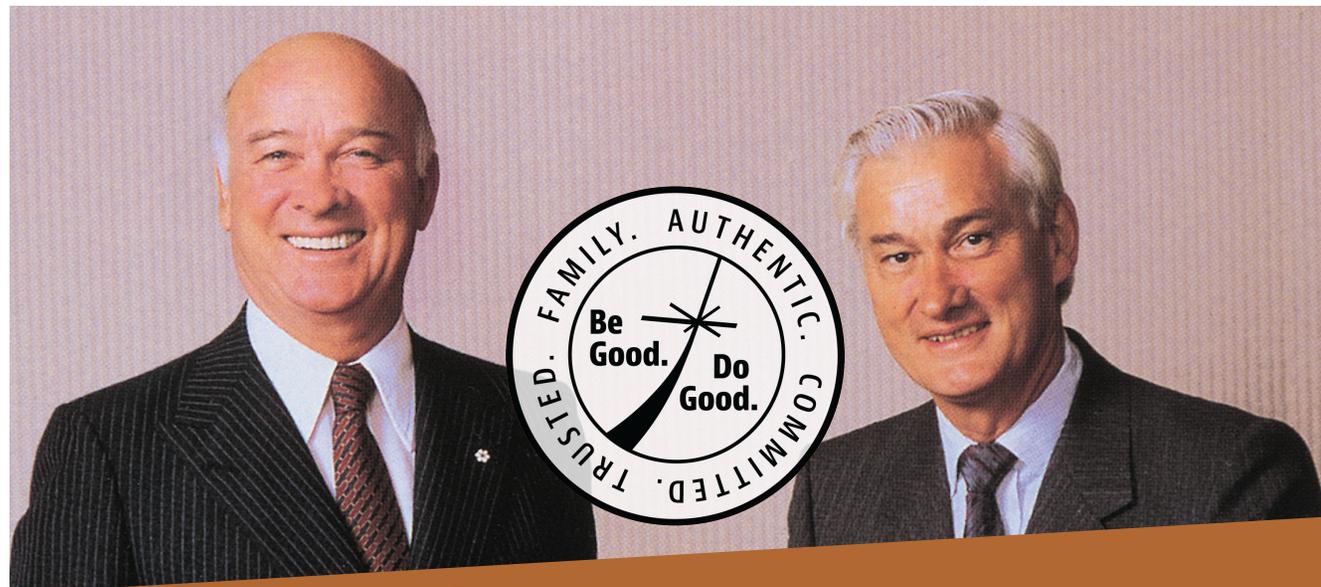
Our daily actions are not only governed by the Code but also by the law, regulatory policy and personal integrity. In every interaction and decision we make throughout the course of the day, we must always ask ourselves if an action we are about to take complies with the

Code, is legal, is ethical and if it will reflect well on ourselves and the Company. When unsure of any action, seek guidance from this Code and its resources or ask yourself this question: Would I want to read, or have others read, about my actions in the newspaper?

At McCain Foods we implement the Code in accordance with local laws, which may affect our decisions and actions differently region to region. As employees, we are obligated to:

- Conduct ourselves with honesty, integrity and fair dealings

- Promote a work environment based on trust and respect for each other, our suppliers, the communities in which we operate and all other stakeholders
- Ensure open communications, and avoid conflicts of interest
- Maintain a safe and secure workplace (including in our use of information technology systems)
- Maintain the safety of our products
- Protect the environment
- Comply with all applicable laws, Company policies and other Company requirements



*"Good Ethics
is Good Business"*

McCain Management: Ensuring we Live our Values Every Day.

At McCain Foods we all have a responsibility to live our values every day. The leaders in our organization also have a responsibility to lead by example and ensure that everyone here understands and upholds the Code. Leaders should:

- Nurture an environment where employees are comfortable coming to you to discuss potential violations of the Code or the law
- Never ask or direct an employee to act in violation of the Code

The Code of Conduct Certificate of Acknowledgement

New Employees:

As a condition of employment, all new employees are required to sign a Certificate of Acknowledgement, which states:

I have received and read the McCain Foods Code of Conduct and understand that I have an obligation to comply with it. I agree that compliance with the Code of Conduct is a term of my employment relationship and that non-compliance with the Code of Conduct may result in disciplinary action, up to and including termination of employment.

If there is any section of the Code that you do not understand, ask your Manager or local Human Resources team for clarification. An online version of the Code can be found on the McCaintranet and at www.mccain.com.

Creating an Open Environment: Responding to Questions and Concerns

The Code offers resources to help employees raise questions or concerns in whichever way they feel comfortable, including talking with local Human Resources teams and confidential reporting.

As a Manager, if a McCain employee comes to you with a Code concern, it is your duty to listen and evaluate the concern. Ask yourself: does the concern require investigation? If so, contact your local Human Resources or Legal teams. Be sure you keep all information related to the concern confidential, only sharing it as necessary, such as with those involved in the investigation.

McCain employees who wish to report Code violations have options: the Code Connection email or via our third party reporting system, The Network. Information about these options is available on page 42 of the Code and on the McCaintranet Code of Conduct and Policies page. It is important these channels are widely and openly shared, so employees feel comfortable sharing a concern, should they ever have to do so.

Employee Recertification:

All current employees will be required to participate in training and sign a Certificate of Acknowledgement each time the Code is redistributed. In addition, employees in specific positions may be required to complete and sign an annual certificate confirming that they have complied with the Code. Individuals who do not complete certificates may be subject to disciplinary action.

The Code and the Law

Our actions are scrutinized daily by customers, suppliers, fellow employees and shareholders who want and expect to be associated with an ethical and law-abiding company. Without exception, McCain Foods is committed to strictly observing all laws applicable to it or its operations. Failure to comply may subject the Company and the individual(s) involved to substantial civil and criminal penalties.

Compliance with the law is the minimum required standard of conduct in all Company affairs.

As a global company, our operations and employees are subject to a variety of local and other laws. If you are uncertain as to what laws apply or how to interpret these laws, consult your local Legal team before proceeding.

Your Accountability

We all have an obligation to hold our employees accountable to the standards of the Code. If you observe behaviour that may violate our Code, it is your responsibility to raise the issue promptly. McCain Foods has made it easy for you to do so.

Understanding the Code

It is not possible for the Code to cover all situations in which legal or ethical issues may arise. The Q&A section of the Code provides additional information and examples for the purpose of clarification. It's not meant to provide full explanations of applicable policies, practices or procedures. You are responsible for understanding the Company's standards and for asking questions when you are unclear about the meaning of the Code or uncertain about how to handle a situation.

Who to Ask

If you need to make an informed legal or ethical decision, but cannot find the answers within the Code, please contact your Manager, local Human Resources, Legal or Finance teams for assistance. McCain Foods' global leaders are also available to all employees for assistance and information regarding the Code and the interpretation of policies, laws and regulations. All communication with these team leads will be treated with discretion. A contact list is located at the back of this booklet.

Reporting a Concern

However, if you feel that reporting a possible violation to your local management team or the Company's global leaders is not an option, you may report your concerns through the following resources:

- Sending an email to codeconnection@mccain.ca – this email is monitored by the global HR team and will keep your concern as confidential as possible
- The Webmail link accessible at www.mccain.ethicspoint.com – monitored by Navex, a third party reporting system
- Hotline phone numbers (where available) monitored by The Network, a third party reporting system. A complete list of telephone hotlines is provided on page 42

Reporting Anonymously

If a situation arises where you do not wish to report actual or suspected Code violations to your local management team or the Company's global leaders, you are encouraged to report your concern through two channels provided by a third party, The Network: the online reporting portal Webmail or Telephone Hotline Reporting. The Network allows you to report possible Code violations anonymously. It's available 24 hours a day with translation services, both online and over the phone. More detail about Telephone Hotline numbers and the online Webmail link are available on page 42 at the back of this booklet.

Note: The Network reporting channels are intended for reporting possible Code violations, not for general grievances.

How Concerns are Treated

Questions and concerns related to the Code, addressed to global teams or Code Connection, will be held in confidence as much as reasonably possible. Information will be shared only with those as necessary in connection with investigating and resolving the matter.

If an employee approaches you, only discuss the details of his or her question or inquiry with those individuals required to provide input, respond, investigate or resolve the matter.

Investigations

Any potential violation of the Code will be investigated appropriately, either by local investigators, global teams or third-party resources. It is each employee's responsibility and obligation to cooperate fully, promptly and truthfully with any such investigation. Any employee who does not cooperate may be subject to disciplinary action.

No Retaliation

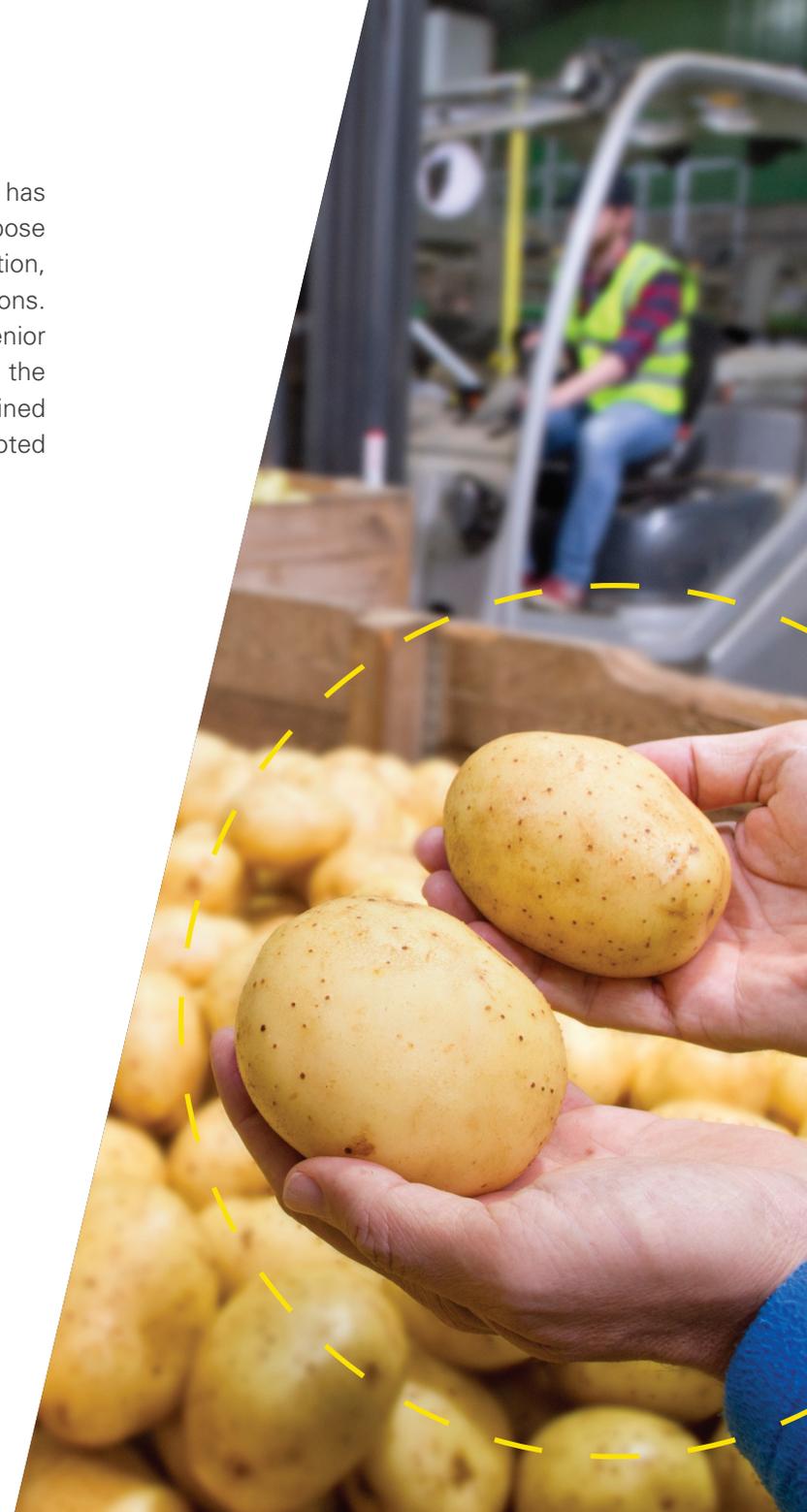
The Company depends on all of its employees to uphold the Code. As such, we depend on employees to express concerns or report possible violations. Retaliation against employees who exercise this duty is itself a violation of the Code. If you make a report or express a concern related to the Code, and you feel you have been treated unfairly, report the matter immediately.

Disciplinary Actions

When it is determined that an employee has violated the Code, the Company will impose an action suited to the severity of the violation, including termination for serious violations. The decision may be made by senior management based on the nature of the violation. When an employee is determined to have made a violation, this will be noted in the employee's permanent record.



See page 42 for details





How We Treat Others



Treating All Stakeholders with Respect
Diversity and Inclusion
Discrimination and Harassment
Privacy



Treating All Stakeholders with Respect

Treating people around us with courtesy and respect is not only a matter of professional integrity, it is good business. Treating others with respect promotes an environment of openness that allows for greater employee and customer satisfaction, engagement and loyalty.

You can demonstrate respect with simple yet powerful actions:

- Encourage coworkers to express opinions and ideas
- Listen to what others have to say before expressing your viewpoint
- Share information regularly and involve others in decision making
- Use people's ideas to change or improve work
- Never insult or ridicule people or their ideas
- Promote a diverse and inclusive workplace
- Use constructive feedback and try to praise more frequently

Our customers, suppliers and consumers form the world outside of McCain Foods that allows us to grow, innovate and generate positive business results. Treating these external stakeholders with respect, while complying fully with our legal and ethical obligations, is central to our ability to maintain our reputation

and strengthen our competitive advantage.

The way in which we portray our competitors may impact the way our customers or stakeholders perceive our business and our actions.

Treat all McCain Foods stakeholders with the highest level of respect. This includes employees, suppliers, consumers and competitors.

Diversity and Inclusion

McCain Foods is committed to building a diverse and inclusive culture, while providing an environment free of discrimination and harassment - where all individuals are treated with respect and dignity, can contribute fully and have equal opportunities.

Diversity is about ensuring we have the right mix of people in our business – people reflective of the customers and communities we serve. Inclusion is about how we work together. An inclusive culture is one where everyone can deliver their best performance while being their authentic selves.

Discrimination and Harassment

It is everyone's responsibility to ensure that McCain Foods provides a safe, respectful and inclusive environment, free of discrimination and harassment.

Bias, discrimination or harassment based on any trait that differentiates us will not be tolerated.

Discrimination is the exclusion of others from full participation because of something that makes them different.

Harassment covers conduct that is likely to create a hostile, intimidating or offensive work environment, and can include a wide range of acts from requests of a sexual nature to insults, offensive jokes, racial slurs or treating an individual in a derogatory or demeaning manner.

If you become aware of behaviour that you consider to be either discriminatory or harassing, either in person or on social media, consult your local Human Resources or Legal teams.

Refer to local workplace harassment policies for further guidance.



See page 42 for details

Q&A

Q: I consistently receive performance reviews that classify me as a top performer, but despite this, I keep getting overlooked for promotions within my department. I'm beginning to wonder if I'm being treated in a discriminatory way due to my ethnic origin. What should I do?

A: You should first have an open discussion with your Manager about why you were overlooked for each individual role. If, after these discussions, you continue to question the rationale for these decisions, outline your concerns to your Manager. If you are not satisfied with your Manager's response, direct your concerns to your local Human Resources team or senior management.

Q: My Manager keeps asking me out socially despite the fact that I continue to refuse the invitations. I'm beginning to feel uncomfortable. What should I do?

A: Clearly communicate that the social invitations are unwelcome and that they are making you feel uncomfortable. If they continue or if you feel that your Manager is treating you differently as a result of voicing your concern, speak with your local Human Resources team or senior management.

Privacy

Respecting the privacy of our employees, customers, consumers and suppliers is both a legal requirement and good business. As such, we must handle personal data responsibly and in compliance with all applicable privacy laws.

If you handle the personal data of others, you must:

- Be aware of and act in accordance with applicable laws
- Be aware of and act in accordance with any relevant contractual obligations
- Collect, use and process such information only for legitimate business purposes
- Take care to prevent unauthorized disclosure to those who do not have a legitimate business purpose for the information

Refer to our Global Privacy Policies and local procedures for further guidance or contact our Privacy Officer at mccainprivacy@mccain.com.

Q&A

Q: I work in Human Resources. Recently my local Marketing lead asked for a list of names, salaries and job titles of Marketing personnel in other McCain markets to assess her team's capabilities and remuneration. Is it appropriate to provide this information?

A: The salary information of individual employees is confidential and subject to privacy laws in many jurisdictions. For the purposes of research, salary ranges by position description and region may be provided. If you require further clarification, consult your local Legal team.





In the Market



Fair Competition

Competitive Intelligence

International Business

Government Business

Political Activities and Contributions

Safety and Sustainability



Fair Competition

The purpose of competition laws – also known as anti-trust, monopoly or fair-trade laws – is to promote a healthy, vigorous and competitive economy in which businesses are free to sell their products on the basis of quality, service and price.

Fair competition is a fundamental principle of McCain Foods' business beliefs: we seek to outperform our competition in a lawful, honest and ethical manner.

McCain Foods will not engage in or support any activity that conflicts with competition laws or regulations in any region in which it operates.

We must obey the competition laws of any country where McCain Foods does business. Consequently, we must refrain from discussions with competitors that could be perceived as hindering fair competition. Seek legal guidance from your local Legal team before communicating with any of our competitors.

Competition laws are complex and vary from country to country. However, in general they prohibit the same types of activities. For example, it is generally contrary to law to make agreements with competitors to:

- Fix prices, terms or conditions of sale for competing products or services
- Divide or allocate customers, bids, markets or territories for competing products or services

- Refuse to sell to particular buyers or buy from particular suppliers
- Exchange non-public information in order to reduce competition

Relationships with distributors and customers, whether embodied within written agreements, verbal understandings or otherwise, must reflect a commitment to proper trade practices and compliance with applicable laws.

Violations of competition laws are a serious matter and can result in significant penalties, severe business restrictions and reputational damage. Depending upon the jurisdiction, these may include fines against the Company and individual employees, imprisonment and civil damages.

For more information, refer to our Global Competition Law Compliance Policy and Guidelines.



See page 42 for details

Competitive Intelligence

Gathering competitive information for the purpose of understanding the marketplace and furthering the Company's business is encouraged and expected. However, as much as we value our own non-public information, we also respect the non-public information of other companies. The collection of competitive information must be conducted in a legal and ethical manner.

International Business

As a multinational company doing business in countries throughout the world, it is imperative that we understand and obey all applicable local laws, particularly as many government laws specifically forbid certain practices relating to international business.

Anti-Corruption and Bribery

Many countries have laws prohibiting payments that amount to bribes to both public and private individuals. For example, in the United States, the Foreign Corrupt Practices Act prohibits making payments to a foreign government and their personnel to enter into a contract or business relationship. Similarly, in Canada, the Corruption of Foreign Public Officials Act strictly prohibits the making of bribes, direct or indirect, intended to gain a competitive advantage in business.

McCain strictly forbids payments to government

Q&A

Q: We recently hired an employee who previously worked for one of our competitors. May I ask the employee for information about this competitor?

A: The employee has an ethical responsibility, and possibly a legal responsibility, to keep his or her previous employer's non-public information confidential. By asking for information that violates this responsibility, you will be placing the new employee and the Company in a difficult position and you will be demonstrating behaviour inconsistent with the expectations of McCain Foods' employees.

officials to facilitate business dealings with foreign governments.

The legal penalties for making prohibited payments may be severe for both the employee and the Company. If you are unclear on the status of certain types of payments or you feel the nature of a payment request is questionable, consult your local Legal team.

The Global McCain Anti-Corruption Policy and Guidelines, available on the McCaintranet, provide comprehensive information related to prohibited activities.

Export Controls/Sanctions

Many governments prohibit, regulate and limit the export of many products, services and technologies to specified foreign countries. Additionally, from time to time, some governments will identify particular countries,

organizations or individuals with which business relationships are not permitted. If there is any question about whether business with a country has been suspended, or whether prohibitions apply to a proposed transaction or named individual, consult your local Legal team.

Boycott

Certain countries attempt to make commercial relations conditional upon a pledge to abstain from conducting business with governments or businesses located in other countries, or with persons on the basis of race, religion or national origin. Agreeing to boycott conditions is expressly forbidden by certain governments and by the Company. For questions regarding potentially unlawful language, contact your local Legal team.

Government Business

The governments of many countries around the world are important and valued customers of McCain Foods. To protect the public interest, transactions with governments are covered by special legal rules and are not the same as conducting business with private companies. Compliance with laws and regulations is required of all contractors who wish to do business with a government, as even the appearance of impropriety can erode public confidence in the Company and in the government procurement process.

McCain Foods follows strict compliance with laws and regulations covering government business.

Gifts to Government Personnel

In many countries, gifts, favours, entertainment or meals, no matter how nominal, may not be offered to government employees or officials. Many countries have passed legislation criminalizing bribery of government officials and the sanctions for violating these laws can be severe, regardless of purpose or intent. In countries where gift and entertainment practices are permitted, McCain Foods employees must comply with applicable regulations, this Code, and the Global McCain Anti-Corruption Policy, Procedures, and Guidelines.

Prior to providing anything of value – no matter how nominal – to a government official, you must obtain written approval from your local

Legal team. This includes cash, gifts, meals, entertainment, Company product, offers of employment, etc.

For further information on gifts or entertainment to a third party, in the context of McCain Foods' business, please refer to the Gifts and Entertainment Procedure contained in Appendix B of the Global McCain Anti-Corruption Policy and to the Conflict of Interest section below.

Restrictions Placed on Government Personnel

Some governments prohibit their contractors and procurement officials from engaging in certain activities while procurement is being conducted. Unacceptable activities include the soliciting or disclosing of proprietary or source selection information. These prohibitions are in effect from the development, preparation and issuance of a solicitation through to the award of a contract and any modification or extension of the contract.

Familiarize Yourself with Local Regulations

All employees involved in government contract work are expected to familiarize themselves, and to comply, with special regulations, the law and the Company's own guidelines for handling government business. This includes obligations to:

- Comply with contract specifications
- Report accurate cost and pricing data

Who are Government Officials?

- Employees of any government or government-controlled entity
- Political parties and party officials, including candidates for political office
- Employees of public international organizations, such as the United Nations

- Prevent disclosure of confidential material
- Comply with restrictions on the employment of former government workers

Questions regarding the applicability of government procurement laws should be referred to your local Legal team.

Political Activities and Contributions

McCain Foods believes that an active and informed citizenry is vital to the functioning of the governmental process. We encourage you to participate in the political process in public matters of your own choice and according to your own beliefs. However, you must refrain from political participation on behalf of the Company. This includes sharing views, contributing funds, product or other Company assets, aligning or partnering the Company to political campaigns or using the Company's name or products to advance your own personal political beliefs.

No employee shall make monetary, product or other contributions from Company or subsidiary funds or property to any political parties or candidates without the express authorization of the President and CEO of McCain Foods Limited, even when local or foreign laws may permit such practices.

Also, no employees shall, on behalf of the Company, attempt to influence another employee's decision to make or refrain from making a personal political contribution to a candidate or a party.

The Company regularly communicates its views to legislators, governmental agencies or to the general public with respect to existing or proposed legislation or governmental policies or practices affecting business operations. Some countries have enacted lobbyist and/or lobbyist registration legislation regulating these activities. The Company expects all employees to comply with such legislation. Further, all interactions and communications between the Company and governments or political parties are to be managed by McCain Foods' local Government Relations team and/or Legal team, under leadership from the Regional President.



See page 42 for details

Q&A

Q: My friend is running for public office. Can I assist in the campaign?

A: Yes. Your personal political activity is your business, but you must refrain from using Company resources or the Company name to advance the campaign.

Q: As a business, we don't agree with some proposed new legislation related to the food manufacturing process. Can we express our views on behalf of the Company?

A: Government relations must be conducted through authorized channels, usually designated by the regional leader or managed through the Legal team, as the Company's views must be presented in the context of its overall business. Furthermore, comments respecting current or proposed legislation or regulation are often a matter of public record, and lobbying activity is regulated in many countries. If you are concerned about the business impact of proposed government action, bring it to the attention of your local Government Relations designate or Legal team.

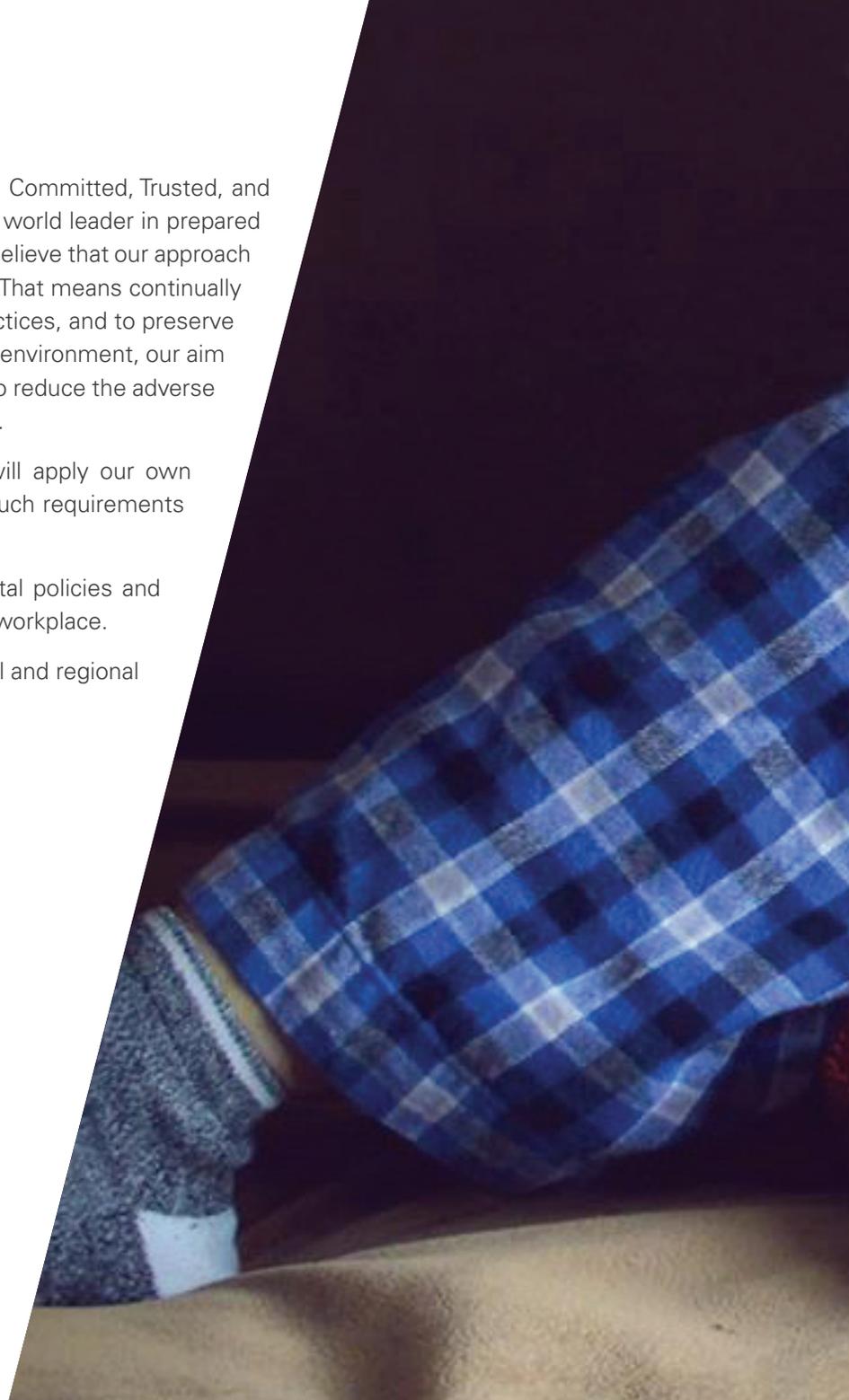
Safety and Sustainability

In conducting business, we are guided by our Company values of Family, Authentic, Committed, Trusted, and Be Good. Do Good. We are also driven to innovate by our Company vision to be the world leader in prepared potato and appetizers, admired for our quality, people and customer dedication. We believe that our approach with respect to our products and environmental sustainability should be no different. That means continually working to enhance the quality of our products, to follow appropriate food safety practices, and to preserve the quality of the environment wherever we operate. In preserving the quality of the environment, our aim is to continuously improve our environmental performance by finding effective ways to reduce the adverse impacts of our business. These approaches are all at the heart of Be Good. Do Good.

McCain Foods regards compliance with the law as a minimum standard. We will apply our own standards of responsible practice where there are no local requirements or where such requirements are considered by us to be insufficient.

You are responsible for understanding the Company's food safety and environmental policies and requirements and for applying sound food safety and environmental practices in the workplace.

For further guidance, please refer to the Global Environmental Policy and to our global and regional quality and food safety requirements.







Within the Company

Confidential Information

Proper Use of Company Assets

Business Records and Controls

Fraud

External Communications

Occupational Health and Safety

Substance Use

Confidential Information

The Company's non-public confidential information is critical to its competitive advantage. The unauthorized use or release of confidential information can cause the loss of this advantage, as well as damage relationships with customers and embarrass or harm fellow employees.

Confidential information includes:

- Any information or knowledge created, acquired or controlled by McCain Foods that the Company has not disclosed publicly.
- Information obtained from a third party under the terms of a confidentiality or non-disclosure agreement

Generally speaking, any information which is not publicly posted on the Company's external-facing websites or within the Company's promotional or marketing materials is considered non-public information and should be kept confidential at all times.

Non-public information may include, but is not limited to:

- Financial information (statements, records, contracts, supplier quotes)
- Business plans (strategies, objectives, plans, patent/trademark applications, results, mergers or acquisitions)
- Sales and marketing data (product plans, market share information, new product launches)

- Employee records (home addresses and phone numbers, medical records, personnel and salary data, major management changes)
- Technical information (recipes/specifications, designs/drawings, engineering/manufacturing know-how, details of processes, copyrighted material, software)

You must ensure that Company information under your direction or control is properly safeguarded in accordance with Company policies and instructions. You must also comply with all third-party confidentiality and non-disclosure agreements that bind the Company.

Safeguarding confidential information involves:

- Limiting access to confidential information to authorized persons with a "need to know"
- Disclosing confidential information only with authorization and where there is a valid business need, and then, only as specified in Company policies and instructions
- Refraining from using Company information for personal benefit or other non-Company purposes
- Observing the terms of applicable agreements

Unauthorized releases or suspected releases of confidential information, whether intentional or unintentional, should be reported immediately to local management and to your local Legal team.

Q&A

Q: The technical work I do is confidential, but locking it up at night is an inconvenience. I feel confident it will be safe on my desk. May I leave it there?

A: No. Confidential documents should be kept secure and out of sight while you're away from your desk. If you handle sensitive or confidential information, you are responsible for protecting it from damage, loss or unauthorized release.

Q: My laptop computer was stolen. What should I do?

A: Every employee's laptop will house confidential Company information, and the theft of this is serious. Inform Information Services immediately, and provide them as much information as possible related to the content on your personal drives. In addition, inform your local management and Legal team.

Proper Use of Company Assets

Ethical behaviour is demonstrated not only by how you act toward others, but also how you treat property that does not belong to you. Company assets, including both physical and intangible, are critical to the day-to-day business operations of the Company.

You are responsible for ensuring the safe and appropriate use and care of Company assets.

As a general rule, Company assets should only be used for the benefit of the Company, not for your personal benefit or the benefit of anyone other than the Company. That said, it is important to use your common sense when judging appropriate use. For example, while periodic personal use of Company assets from the workplace is acceptable, excessive internet surfing, or personal phone calls or email is a misuse of assets. Further, you may have access to certain Company assets, such as a car or wireless device. If so, it is important that you refer to local policies to ensure that you are using these assets as intended.

Always follow Company policies, rules and guidance relating to safeguarding our information technology and protecting the security of our physical and electronic systems. Given the increased importance of protecting the security of our electronic assets, non-compliance with Company requirements in this regard may result in disciplinary action.

Examples of Company Assets:

Physical

- Company money
- Company product
- Computer systems and software
- Telephones
- Wireless communications devices
- Photocopiers
- Tickets to concerts or sporting events
- Company vehicles
- Manufacturing equipment

Intangible

- Employees' time at work
- Proprietary information
- Company trademarks
- Intellectual property
- Pricing formulas
- Customer lists

Refer to the following Company policies and procedures for further guidance:

- Global Acceptable Use Policy
- Global Corporate Card Policy
- Global Email Guidelines
- Global Travel and Expense Policy
- Global Data Breach Reporting Procedure

Business Records and Controls

The Company's records represent its business and ensure the Company meets its legal and regulatory obligations. This includes not only financial records, but record keeping completed

by employees, including but not limited to quality reports, time records, expense reports, benefit claim forms and resumes.

It is your responsibility, both legally and ethically, to ensure the accuracy of all Company business and financial records and to ensure record management, retention and destruction in accordance with our Global Record Management Policy. Honest mistakes will occasionally occur; only intentional efforts to misrepresent or otherwise falsify Company business records or mistakes that occur repeatedly are considered Code violations.

Financial Records

The Company's management, lenders and shareholders are entitled to financial statements that fairly represent the Company's financial condition and results of operations. Our ability to deal honestly and fairly with suppliers, customers and employees depends upon each and every transaction being recorded accurately and completely. Accordingly, the Company's records and books of account must be truthful and complete for all Company transactions.

The Company is committed to a system of internal controls that will:

- Provide reasonable assurance that transactions are executed and recorded in accordance with company policy
- Permit preparation of reliable financial statement
- Maintain overall financial control

In addition to these controls, it is your responsibility to ensure that:

- Invoices processed for payment have the appropriate approvals and are made with the intention that the payment will be used for the purpose described by the documents supporting the payment
- No undisclosed or unrecorded funds or assets are established or maintained for any purpose
- No false or misleading entries are made in any books or records for any reason

Always record and classify transactions in the proper accounting period and in the appropriate account and department. Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals.

If you have reason to believe any fund, asset, entry or payment might exist which violates Company standards, you must report your concern to your local Legal team, Finance director or the Company's corporate Internal Audit team.

Refer to the Global Finance Standard Practice Instruction Manual for further guidance.

Fraud

Fraud is a crime and an ever-present threat to a company's resources and reputation. Fraud is the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.

Some examples of fraud include, but are not limited to:

- Theft of funds
- Submission of false expense reports and invoices
- Alteration or falsification of Company records
- Forgery or alteration of a cheque or any other financial document
- Concealment of a fact that could have significant impact on the Company's finances or ability to do business

Q&A

Q: I am a Marketing manager, and have been asked by the local community college to teach a marketing course to night students. Can I use examples of specific marketing campaigns executed by the Company?

A: Marketing strategy and creative development is considered proprietary information as it is built upon Company research. Sharing this information would be in violation of the Code.

That said, you can speak to specific marketing campaigns at the general level, limiting the discussion to that information that is made available publicly through the marketing campaign itself, including the campaign's messaging and creative execution. Any information related to strategy or results is considered confidential and must not be disclosed.

Q: I am an administrative assistant, and my Manager continually asks me to conduct personal errands on his behalf, such as picking up dry cleaning and purchasing personal gifts. Is this appropriate?

A: No. Your time is a Company asset, and requesting non-Company activity during business hours is a misuse of your time. Speak to your Manager about ways in which your time could be put to use on behalf of the Company. If your Manager is in need of personal assistance, offer to help them find a personal assistant.

- Misrepresentation of transactions or financial results to achieve performance objectives
- Destruction, removal or inappropriate use of records or Company assets
- Knowingly participating in the fraud of other parties
- Profiting as a result of insider knowledge of Company activities

Fraud

Fraud is an intentional deception made for personal gain or to cause loss or damage to another individual or party.

Management has a duty to identify and implement internal controls, policies and procedures to prevent and detect fraud. You have a responsibility to report all cases of suspected fraud to your local Legal and/or Internal Audit teams.

External Communications

The way in which the Company presents itself in the marketplace is critical to the success of the organization. The goal of any external interaction is to present a favorable and truthful image of the Company and its products or services to potential and actual customers and to consumers at large. A sampling of

Q&A

Q: Today is month end, and my report shows that our department is slightly under budget. My Manager has instructed me to add one or two of next month's expenses to meet the target. Is this appropriate?

A: No. You are responsible for producing truthful and complete records of the Company's financial results. You should point this out to your Manager, and if they continue to insist you alter your records, the matter should be reported immediately to a senior manager or your local Human Resources or Legal team.

Q: While on a business trip next week I plan to take my sister out to dinner for her birthday. Can I put the restaurant bill on my expense account if I submit the credit card receipt?

A: You may submit your portion of the restaurant bill for reimbursement, but the portion of the bill considered a personal expense (your sister's meal), must be paid directly by yourself.

external communications channels include, but are not limited to:

- Personal interactions and business meetings
- Media and government relations
- Marketing and promotional materials
- Advertising
- Speeches and presentations
- Intranet and email
- Company websites and social media channels

Please note, if you list your employer as McCain Foods on your personal social media account(s), you must abide by our Global Digital and Social Media Governance Policy and other applicable requirements.

Mass Communications Channels

In communications that reach a mass audience, including marketing or promotional materials, Company websites, advertising, sales promotions and the like, the Company's messaging and brand or corporate image is highly controlled by the local or global Marketing and/or Corporate Affairs teams. If you are developing or considering the development of materials for a mass audience, you should consult these teams first to review and approve all final materials to ensure that the Company's messaging and brand image are reflected appropriately.

Before opening any social media account on behalf of McCain Foods, please consult the Global Digital Compliance Toolkit.

Personal Communications

Personal communications, such as face-to-face business meetings, business letters, customer presentations and emails must reflect the Company's messaging and brand image. If you are responsible for external communications, it is your responsibility to be familiar with the overall tone, style and image of the Company's brand or corporate image. If you are unclear, please consult your local or global Corporate Affairs team or a representative from senior leadership.

Speeches and Presentations

From time to time you may be invited to speak or present on behalf of the Company at a local or international conference or event. If so, review the invitation with your Manager to determine if it would be beneficial for the Company to participate and that you are the appropriate person to present the subject matter. All speeches and presentations developed for external audiences must be reviewed and approved by the local Corporate Affairs team prior to delivery to ensure there is no disclosure of non-public information. See the Global Media Policy for further guidance.

You must not accept payment for speeches or presentations that have been authorized by the Company.

Reimbursement for travel, accommodations and/or meals is permissible with written approval from your Manager.

Media and Government Relations

McCain Foods has expressly authorized individuals who are available to speak to and manage inquiries from the media, as well as approach the government on identified issues. This may be your local Corporate Affairs team member, a representative from senior leadership or the Company's global Corporate Affairs team, which is responsible to handle inquiries of an international nature or to assist the regions where required.

Only authorized spokespeople may respond to media inquiries or approach the government.

If you are not the authorized spokesperson, you must not respond to any media inquiry or offer any information to a member of the media, unless specifically requested to do so by the authorized spokesperson. This includes requests for information via social media channels, email, phone, and in person. All media inquiries must be immediately referred to your local spokesperson. If you are uncertain who the authorized spokesperson is for your region, contact global Corporate Affairs.

Occupational Health and Safety

We want to maintain a healthy and safe work environment for all of our employees, and we

will conduct business in a manner which takes every reasonable precaution to minimize the risk of work-related injuries, illnesses and accidents.

Compliance with the Company's Health and Safety standards or requirements is obligatory, and should be considered the minimal requirements.

You should make every effort to:

- Take all reasonable precautions to ensure safety on the job and continuously strive to improve safety performance
- Work to promote safety awareness and a safety-first mindset
- Emphasize prevention, the removal of unsafe conditions and the elimination of unsafe behavior
- Follow safe work practices and procedures
- Correct all safety-related deficiencies and non-conformances promptly
- Not compromise health and safety in the workplace for any reason

Substance Use

The Company is committed to the health, safety and wellbeing of its employees. As part of this commitment, the Company makes every reasonable effort to minimize risks associated with its operations and to ensure a safe, healthy and productive workplace. You are expected to act responsibly during Company-related business, social and recreational events, and you are required to be fit at all times to

perform your assigned duties. While at work, you must not be impaired by the use of alcohol, medication or drugs.

If you feel you have a problem related to alcohol or substance abuse, and you are not seeking treatment, McCain Foods offers employees assistance programs in many of its regions through a third-party confidential service. We encourage you to seek the assistance of these programs. We also support you discussing your individual situation with your Human Resources team. We are committed to reasonably assisting our employees in reaching their full potential, and may develop a personal employment plan for you to work through your issues while employed by the Company. It must be understood, however, the failure to complete the plan as agreed, could result in disciplinary action, up to and including termination.

Refer to the following policies for further guidance:

- Global Health and Safety Guidelines
- Global Hazardous Energy Control (Lockout/Tagout) Policy
- Global Incident Investigation and Reporting Policy
- Global Incident Recordkeeping Procedure
- Global Hazardous Chemicals Policy
- Global Cell Phone Guidelines
- Local Drug & Alcohol Policies





Conflicts of Interest

Outside Business Interests
and Employment

Relationships with Customers,
Vendors and Suppliers

Nepotism

Questionable or Improper Payments

Gifts and Entertainment

A conflict of interest generally arises when we promote or participate in an activity which results in or is perceived as resulting in:

- Interfering with our objectivity in conducting our responsibilities and duties on behalf of the Company
- Benefiting ourselves or those that we associate with outside of the Company

You must always conduct your activities with the Company's best interest in mind.

Conflicts of interest can arise under many circumstances such as:

- Being influenced in your judgment when acting on behalf of the Company
- Competing against the Company in any business activity
- Diverting business away from the Company
- Misusing the Company's resources or influence

Outside Business Interests and Employment

McCain Foods recognizes and respects the right of employees to take part in financial, business and other activities outside of their jobs on their own personal time. However, external activities must not place you in conflict or in an appearance of conflict with your obligations or responsibilities to the Company or divert your attention away from fulfilling your duties to the

Company.

You must avoid any personal investment, interest, association or relationship that interferes or might interfere with your decisions on behalf of the Company.

For example, you must not:

- Be employed by or have a substantial business interest in a competitor
- Be employed by, provide consulting services for or have a substantial business interest in a supplier or customer unless approval is first granted in writing by the President and CEO of McCain Foods Limited; this approval must be renewed annually
- Accept a position on another company's Board of Directors unless approval is granted in writing by the President and CEO of McCain Foods Limited (this policy excludes charitable and not-for-profit organizations); this approval must be renewed annually

Relationships with Customers, Vendors and Suppliers

If you are involved in the selection or purchase of goods and services from vendors and suppliers, you must avoid situations that could interfere, appear to interfere or call into question your ability to make free and independent decisions for the benefit of the Company. Purchasing

and vendor decisions must be based solely on business requirements.

If you feel you are in a situation where a conflict of interest exists, consult with your Manager and request that the decision-making power be transferred to another individual or that you are removed from the situation.

Nepotism

You may have relatives who are employed by or become employment candidates of McCain Foods. If so, you should not supervise, be under the supervision of or be in a position to influence the hiring, compensation, role or conditions of employment of any relative. Also, if one of your relatives is employed by or has an ownership interest in a customer or supplier that deals with McCain Foods, you must avoid exercising any discretionary authority in dealing with the customer or supplier without first reporting this relationship and taking appropriate steps to address the conflict of interest.

All McCain Foods employees are required to adhere to these requirements and disclose the relationships referred to in this section. If you are in an actual or potential position of conflict, you are required to notify your local Human Resources team in writing, gain written approval from the Chief Human Resources Officer for the situation to continue, and take the steps identified, if any, to address the conflict.

McCain Foods reserves the right to take

Who is a "Relative"?

Relationships established by blood, marriage, or legal action. Examples include the employee's spouse, mother, father, son, daughter, sister, brother, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, stepparent, stepchild, aunt, uncle, nephew, niece, grandparent, grandchild or cousin.

Domestic partners (a spouse or other person with whom the employee's life is interdependent and who shares a common residence) and relatives of an employee's domestic partner.

such actions as may be necessary to address any actual or perceived conflicts of interest, including by changing duties, responsibilities and reporting relationships. Failure to comply with the reporting obligations referred to in this section may result in disciplinary action up to and including termination of employment.

Questionable or Improper Payments

The Company's products and services are to be sold exclusively on the basis of quality, service, price and other legitimate marketing attributes. Bribes, kickbacks or other improper payments, made directly or indirectly, to any individual or

organization are strictly prohibited. Acceptance of bribes or kickbacks, in any form and for any purpose, is also prohibited.

Additionally, the use of overbillings or other artificial methods of payment to assist a customer, agent or distributor to evade the tariff, tax or exchange-control laws of any country are improper. These rules apply everywhere that McCain Foods does business and extend beyond those activities which may be illegal under statutes or commercial bribery laws of other countries.

If you are unsure whether a payment would be considered improper, contact your local Finance Director or Legal team.

Gifts and Entertainment

Sales of McCain Foods' products and services and purchases from suppliers must be free from any inference or perception that favourable treatment was sought, received or given, whether in the

form of gifts, favours, entertainment, services or other gratuities.

You should not offer or accept a gift or favour of more than nominal value in the normal course of doing business. If you are presented with one, politely decline and notify your Manager.

This policy does not apply to items of small value commonly exchanged in business relationships, such as unsolicited hospitality, gifts or mementos of nominal value that are customary or business-related. Even in these cases, discretion and common sense should be your guide.

In general, gifts, favours and entertainment should be:

- Consistent with accepted business practice
- In compliance with applicable laws, accepted ethical standards and the McCain Anti-Corruption Policy
- Sufficiently limited in value and in a form that will not be construed as a bribe or payoff

Q&A

Q: A new customer has asked for a special payment arrangement involving a third party. I know it's important to be responsive and develop good customer relationships, but this request is unusual. What should I do?

A: Before responding to such requests, seek advice from your local Legal team or Finance director. Be aware that in some markets money obtained illegally is sometimes "laundered" through legal purchases of goods. While you want to satisfy the customer, be sure to report any suspicious requests.

- Such that public disclosure of the facts would not result in harm to the reputation of the employee or McCain Foods

Entertainment

Socializing with suppliers, vendors or customers is acceptable when reasonably based on building a clear business-based relationship and within the bounds of good taste. Meetings accompanied by a meal are sometimes necessary and desirable; however, excessive entertainment of any sort is not acceptable.

Gifts and Entertainment Provided to Suppliers and Customers

When organizing gifts, meals or entertainment for suppliers or customers of the Company, the gift must support the business interests of the Company and should be reasonable and appropriate. Always be sensitive to our customers and suppliers' own rules on receiving gifts, meals and entertainment.

Travel and Premium Events

If you are invited by a customer, supplier or other business associate to an event involving out-of-town travel or overnight stay to a premium event, consult your Manager to determine if there is adequate business rationale for your attendance. If there is

adequate business rationale, the Company should pay for your travel and attendance at the event.

Gifts Provided to Managers

The exchange of gifts among employees and between manager and employee for special occasions is a normal practice. However, gifts must be purchased with personal funds – unless approved in advance by your Manager. Gifts must always be of nominal value to avoid any perception of influence, particularly with anyone who has influence over you. For further information, refer to your local Expense Report policy and guidelines or contact your local Finance director.

Declining Gifts or Entertainment

If you are offered a gift, meal or entertainment that exceeds a nominal value, politely decline and explain the Company's rules. If returning the gift would offend the giver, you may accept the gift, but you should notify your Manager immediately whether or not accepted, and look to either donate the gift to charity or otherwise dispose of the gift in a manner that does not provide personal benefit.

What does "Nominal Value" mean?

Gifts provided to you by a customer, supplier or other individual or company doing business with the Company should only be accepted if the gift is of "nominal value". Discretion and common sense should be your guide. Nominal value generally refers to items such as pens, notepads, t-shirts, small gift baskets and coffee mugs. Items in excess of nominal value, should not be accepted or given. If in doubt, consult the McCain Anti-Corruption Policy.



See page 42 for details

Q&A

Q: A long-standing customer has given me two concert tickets as a thank-you gift for sorting out a delivery. Can I accept them?

A: Expensive gifts and other favours from people doing business with McCain Foods or people seeking our business are not acceptable, especially as these rewards are for work that is considered part of normal course duties. Use your judgment, taking into consideration the value of the tickets prior to accepting them.

Q: While at a supplier golf tournament, participants were provided golf shirts, fabulous prizes and a four-course meal. Can we participate in events such as this, and if so, can we accept the items and prizes provided?

A: As long as the purpose of the supplier golf tournament is to enhance the relationship between the Company and its suppliers, this would be considered a business function and would be acceptable for you to attend. As the items and prizes provided are a component of the event, you may accept them, but you should report them to your Manager. We encourage employees to donate gifts and prizes won at such business functions to local charitable organizations.

Q: We held a baby shower for my Manager. Is it appropriate for me to put the food provided and the gifts we purchased for her on my expense report?

A: No. Events such as this are part of the fabric of a family company and we encourage them. As they are not business functions, however, the cost must be borne by the organizing group, not the Company.





Want to Know More or Raise a Concern?

Contact Numbers

The McCain Code of Conduct – Reporting a Concern

Contact

Global Functional Teams

Global Legal
Chief Legal Officer
McCain Foods Limited
439 King Street West, 5th floor
Toronto, Ontario M5V 1K4
CANADA
Tel: (416) 955-1700

Global Human Resources
Chief Human Resources Officer
McCain Foods Limited
439 King Street West, 5th Floor
Toronto, Ontario M5V 1K4
CANADA
Tel: (416) 955-1700

Global Operations Support
Vice President, Global Operations Support
McCain Foods Limited
8800 Main Street
Florenceville, New Brunswick E7L 1B2
CANADA
Tel: (506) 392-5541

Global Information Services
Chief Information Officer
McCain Foods Limited
8800 Main Street
Florenceville, New Brunswick E7L 1B2
CANADA
Tel: (506) 392-5541

Global Internal Audit
Vice President, Internal Audit
McCain Foods Limited
439 King Street West, 5th Floor
Toronto, Ontario M5V 1K4
CANADA
Tel: (416) 955-1700

Global Procurement
Chief Procurement Officer
McCain Foods Limited
439 King Street West, 5th Floor
Toronto, Ontario M5V 1K4
CANADA
(416) 955-1700

Global Finance
Chief Financial Officer
McCain Foods Limited
439 King Street West, 5th Floor
Toronto, Ontario M5V 1K4
CANADA
Tel: (416) 955-1700

Policies/Responsibility

Competition and Antitrust
Policies Owner: Chief Legal Officer

- Competition Law Compliance Policy
- Guidelines- Competition Law: Do's and Don'ts When Dealing with Competitors
- Guidelines- Competition Law: Participating in Trade Associations
- Guidelines- Competition Law: Do's and Don'ts When Dealing with Customers/Suppliers
- Guidelines- Competition Law: Category Management
- Guidelines- Competition Law: Mergers and Acquisitions/Discussions/Information Exchanges
- Guidelines- Competition Law: Business Discussions/Document Creation
- Guidelines- Competition Law: Responding to Legal Process

Safety and Environment Policies
Owner: VP, Operations Support

- Global Environment Policy
- Employees with Infectious Diseases Policy
- Incident Management Notification Policy

- McCain Global Safety Policy: Visitor Safety
- McCain Global Safety Policy: Incident Reporting and Investigation
- McCain Global Safety Policy: Hazardous Energy Control (Lockout/Tagout)
- McCain Global Safety Policy: New Plant and Equipment Commissioning

People Policies
Owner: Chief HR Officer

- Diversity & Inclusion Commitment
- Flex work

Communication Policies
Owners: Chief Information Officer, VP Global Corporate Affairs, Chief Legal Officer, Chief Human Resources Officer

- Global Acceptable Use Policy
- Digital and Social Media Global Governance Policy
- Global Privacy Policy
- Global Employee Privacy Policy
- CCTV Surveillance Policy
- Global Data Breach Reporting Procedure
- Global Cellphone Safety Guidelines
- Global E-Mail Guidelines
- Global Translation Principles
- Global Media Policy

Finance and Procurement Policies
Owner: Chief Financial Officer

- Global Travel and Expense Policy
- Global Corporate Card Policy
- Guidelines- Reasonable Meal Expense
- Guidelines- Air Fares
- Global Authority Limits Policy
- Capital Expenditure Request Policy
- Global Procurement Policy

Anti-Corruption

Owner: Chief Legal Officer

- Global Anti-Corruption Policy
- Guidelines- Anti-Corruption: Business Discussion/Document Creation
- Guidelines- Anti-Corruption: Do's and Don'ts When Dealing With Third Parties
- Guidelines- Anti-Corruption: Responding to Legal Process
- Guidelines- Anti-Corruption: Detecting Warning Signs or "Red Flags"

Information Governance

Owner: Chief Legal Officer

- Global Record Management Policy, including Scanning Guidelines and Record Retention Schedule
- Guidelines- Record Management, Destruction and Legal Holds
- Guidelines- Record Management, Retention of and Access to Records

New: Trade and Sanctions

Owner: Chief Legal Officer

- Global Sanctions Policy

Every employee is responsible for familiarizing themselves with policy updates/additional policies and guidelines that may be released from time to time.



The McCain Code of Conduct – Reporting a Concern

It is your responsibility to report concerns or incidents you believe do not comply with the Code of Conduct. If you do not feel comfortable talking to your Manager or local Human Resources, Finance, or Legal team, there are other resources available for reporting.



1. The McCain Code of Conduct

Email: codeconnection@mccain.ca Note: This email is directed to McCain Foods' global Human Resources team, not the third-party confidential service listed below. If you would prefer to make an anonymous or third-party call, please phone The Network Report Hotlines at the numbers listed below.



2. Webmail Link, available in all countries.

www.mccain.ethicspoint.com Monitored by Navex, a third party reporting system. As you may be aware, there is a network webmail link available to all employees to easily bring forward your concerns. For access please visit www.mccain.ethicspoint.com. Webmail follows country specific protocols and legal requirements, and is available in over 20 languages. It also provides the option of contacting a third-party without fear of retaliation. Global Human Resources team, not the third-party confidential service listed below, so If you would prefer to make an anonymous or third-party call, please phone.



3. Telephone Hotlines, available 24/7 with translation services (where available).

This channel is also monitored by The Network, a third party reporting system. This offers another anonymous reporting option.

Country	Country Code (if applicable)	Hotline Number
Argentina		0800-444-9123
Australia	1-800-551-155	888-622-2468
Belgium		080081975
Brazil		08000474158
Canada		8886222468
China		4009901429
Colombia		01-800-5-1-80529
France		0800948669
Germany		08007243506
India	000-117	8886222468
Italy		800902912
Japan		0120914144
Mexico		008002530411
Netherlands		08000200781
New Zealand	000-911	8886222468
Poland		800702828
Russia		88003337489
South Africa		0800000503
Spain		900822569
Sweden		020-79-4272
United Kingdom		08000286914
United States		8886222468

Your privacy is important to us. By submitting personal data or information to us, you agree this will be handled in accordance with the Global Employee Privacy Policy.



Certificate of Acknowledgement

I have received and read the McCain Foods Code of Conduct and understand that I have an obligation to comply with it. I agree that compliance with the Code of Conduct is a term of my employment relationship and that non-compliance with the Code of Conduct may result in disciplinary action, up to and including termination of employment.

If there is any section of the Code that you do not understand, ask your Manager or Local Human Resources team for clarification. The Learning section of SuccessFactors offers an online version of the Code that is free and easy to follow. Ensure that you understand the Code before you sign this Certificate of Acknowledgement.

Employee Name

Employee Signature

Date

Employee Copy



Certificate of Acknowledgement

I have received and read the McCain Foods Code of Conduct and understand that I have an obligation to comply with it. I agree that compliance with the Code of Conduct is a term of my employment relationship and that non-compliance with the Code of Conduct may result in disciplinary action, up to and including termination of employment.

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Employee Name

Employee Signature

Date

Office Copy



McCain Foods Limited
439 King Street West
5th floor
Toronto, Ontario, Canada
M5V 1K4

(416) 955-1700

McCain Foods Limited reserves the right to amend, alter or terminate this Code at any time and for any reason.