



# Good Ethics is Good Business.

McCain Code of Conduct

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# A Message from Max.



At McCain Foods, the way we do business is just as important as the delicious, planet-friendly food that we produce worldwide.

Our commitment to doing the right thing has always been imbedded in our culture. Our founders said that “good ethics is good business”, and that belief is as true today as it was in 1957 when our company began. Throughout our history, we have earned a reputation as an authentic brand and today, as a world leader in prepared potatoes and appetizers, we are trusted by millions of customers and consumers around the world.

Our values and Code of Conduct are an articulation of who we are and what we stand for, and against, as a company. Our Code helps ensure that we maintain the highest ethical standards in everything we do, sets out our fundamental commitments and guides our business practices and decisions – whether big or small, each and every day.

By aligning to our Code, we ensure that our daily decisions maintain customer trust and safeguard our reputation in the communities where we operate. As an employee, you are part of the McCain family and are required to follow our Code of Conduct. If you experience a situation that you believe is inconsistent with our Code, please have the courage to speak up. The Code will guide you to the right decision or the right people to help.

Let's continue to make great food and do business the right way, together.

Max Koeune,  
President and CEO  
McCain Foods Limited





Our  
Code.

# Our Code.

Following Our Code

Upholding Our Responsibilities

Speaking Up and Seeking Help

Making Ethical Decisions

# Following Our Code.

As Max stated in his message, our founders believed that “good ethics is good business”. Many decades later, this belief is still at the heart of how we work at McCain. It is the foundation of this Code of Conduct (our “Code”). Our Code serves as the basis of all our policies, guidelines and ways of working. It is built on one principle: follow the highest ethical standards in everything we do.

Our Code sets out the minimum expectations for how we act, according to our company values, and helps us understand the ethics and compliance risks we face. It also helps us understand how we can each address and minimize those risks.

Our Code can’t cover every situation we might encounter. Because of this, it also serves as a framework for making ethical decisions. If you’re not sure how to apply our Code to a situation you’re facing, know that you have support. Please discuss the situation with your manager or reach out to your local or global Human Resources (HR) or Legal & Compliance teams.

Throughout our Code, we refer to “McCain” or the “Company” to mean McCain Foods Limited and its subsidiaries around the world.

Our  
Code.



# Upholding Our Responsibilities.

McCain requires all its employees, officers and directors to comply with our Code. We also expect our contractors, suppliers and other business partners to uphold these standards as applicable.

**Our  
Code.**

**As employees, we have a responsibility to:**

- Follow our Code, our policies and the law
- Ensure safety is at the forefront of all we do
- Conduct ourselves with honesty and integrity
- Act fairly and ethically in our dealings
- Promote a work environment based on trust and respect; this includes how we interact with each other, our suppliers, the communities in which we operate and our other stakeholders
- Ask questions, share concerns and promptly report any suspected Code violations
- Cooperate with investigations of possible misconduct

**When we are in a position of leadership, we must also:**

- Be an example for others by always upholding our Company values
- Create an inclusive environment where employees feel safe asking questions
- Ensure our teams know and understand how our Code applies to them
- Never ask or tell an employee to violate our Code, our policies or the law
- Escalate matters raised, as appropriate



# Speaking Up and Seeking Help.

We all must report any potential violations of our Code, our policies or the law. If you have a concern, report it immediately to one of the following:

- A manager
- A local or global Human Resources representative
- A member of the Legal & Compliance team

If you feel that reporting to one of the above is not an option, you may also report your concerns (with the option to remain anonymous) through the following channels:

- Email: [codeconnection@mccain.com](mailto:codeconnection@mccain.com). This email is monitored by our Global Compliance team. They will keep your concern as confidential as possible, depending on the nature of the concern.
- Online: at [www.mccain.ethicspoint.com](http://www.mccain.ethicspoint.com)
- Ethics Helpline: a third-party call centre (where available). A complete list of telephone numbers is provided on [page 36](#).

The Ethics Reporting website and Ethics Helpline are available 24 hours a day in multiple languages. In some jurisdictions, McCain has adopted whistleblower policies in accordance with local requirements. If applicable, you may also communicate your concerns in accordance with your local policy.

Any potential violation of our Code will be investigated appropriately. It is each employee's obligation to cooperate promptly and truthfully. A failure to cooperate is, in itself, a breach of our Code.

## No Tolerance for Retaliation.

It takes courage to speak up when something's not right. We depend on our employees to express concerns and report possible violations. The Company does not tolerate retaliation against employees who report concerns in good faith. Employees who support an investigation are also protected from retaliation. If you experience retaliation in any form, or believe that you have been treated unfairly, report the matter immediately.

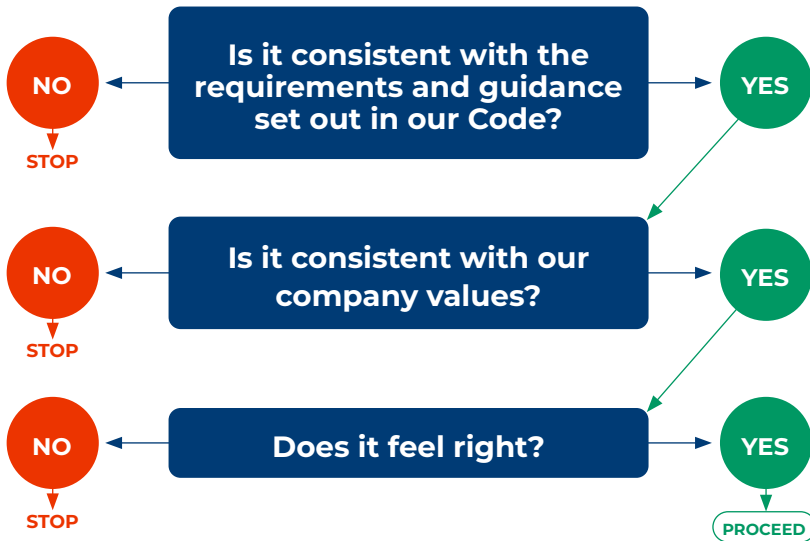
Our  
Code.



# Making Ethical Decisions.

Before taking an action, we must ask ourselves if what we are about to do complies with our Code, is legal and ethical, and will reflect well on ourselves and the Company. Use the following questions as guidance when making a difficult decision at work.

Our  
Code.



**If you answered “no” to any of these questions, you should not take the action you are considering.** If you are concerned about someone else’s conduct, then you need to voice your concerns. Contact your manager, or a local or global Human Resources representative. You may also contact a member of the Legal & Compliance team or use one of the channels listed on [page 35](#).





# Our Family.

Promoting a Safe and Healthy Workplace  
Preventing Harassment, Bullying and  
Discrimination  
Embracing Inclusion

Our  
Family.

# Promoting a Safe and Healthy Workplace.

We put safety at the heart of everything we do.

## Why It Matters.

At McCain, we put health and safety first. If we can't do it safely, we simply don't do it.

## How We Deliver.

- We are each responsible for safety. We are all empowered to take immediate action to keep ourselves and others safe. We never compromise on safety whether working in one of our facilities, offices or remotely.
- We report all safety incidents, unsafe acts and unsafe conditions. This helps us make improvements and reduce risk of injury in the workplace.
- Wherever we work, we promote safety awareness and a safety-first mindset. We emphasize prevention, because every injury can and should be prevented.
- We work together to correct all safety-related deficiencies promptly.
- We never work while impaired by drugs, alcohol or controlled substances and recognize that stress, mental health and physical health can also affect safety. We encourage each other to talk about stress and well-being and use available physical and mental health resources.

Our  
Family.

For Us.  
For Family.



## Good Ethics.

Each of us must ensure we all stay safe and healthy at work. We cannot ignore unsafe conditions. We owe it to ourselves and our colleagues to watch for possible safety hazards. We must each report and/or fix what we see.

## Good Business.

Q

As a new employee, I have some ideas about ways we can improve safety in my workspace. Since I haven't been here very long, is it really my place to mention it?

A

*Yes! We are always looking for improvements to safety. Please raise it with your manager.*

Our  
Family.

### Additional Resources

- The Global Safety Principles and Management commitment
- See your Local HR for:
  - Safety - New Employee Onboarding
  - Right to Refuse
  - Regional Drug and Alcohol Policy
  - Global, Regional and Local Health & Safety policies and procedures



# Preventing Harassment, Bullying and Discrimination.

We treat each other with fairness and respect.

## Why It Matters.

Being respectful in all of our interactions strengthens our connections. It helps create a safe, healthy work environment.

## How We Deliver.

- We always treat one another with dignity and respect.
- We avoid offensive, degrading or threatening language and actions. This includes insults and ridiculing people or their ideas. It also includes unwelcome physical contact of any kind.
- We seek to understand any misstep, apologize and avoid doing it again.
- We encourage coworkers to express opinions and ideas. We listen to others' points of view with courtesy and respect.
- We look out for each other. If we witness harassing or offensive conduct, including sexual harassment, we speak up in the moment. If it doesn't feel safe, we report it through one of the available channels listed on [page 35](#).

Our  
Family.

## Good Business.

Q

One of my team members repeatedly criticizes another person on our team in front of everyone. It doesn't seem fair. I know I'm not directly involved, but it makes me feel uncomfortable. **What should I do?**

A

*Repeated public criticism of one person could constitute harassment. If you feel comfortable, raise the issue directly with the team member who is being critical. Otherwise, speak to your manager, local HR or report it through one of the channels listed on [page 35](#). Even if the individual doesn't feel victimized, it could create a toxic work environment.*



# Embracing Inclusion.

We create a work environment in which we welcome and value all people.

## Why It Matters.

We are committed to becoming an employer of choice for all employees; where leaders, structures and interactions encourage individuals to thrive while being their authentic selves.

Now, and for generations to come.

## How We Deliver.

- We embrace our differences and create conditions for fairness and opportunity.
- We model respectful, courteous and inclusive behaviour.
- We build diverse teams that benefit from our global reach.
- We cultivate belonging and mental wellbeing.
- We actively seek out and listen to different points of view and opinions.
- We speak up about behaviour and actions that conflict with our values.

Our  
Family.

## Good Ethics.

Leveraging the diversity within our company benefits everyone. Innovation, collaboration and open-mindedness are some of the keys to our success. We should all be aware of and combat biases. This helps ensure we are including voices that are reflective of the communities where we work. Good ethics requires everyone to build a culture of belonging for our teams.





# Our Company.

Safeguarding Company Assets

Protecting Confidential Information

Keeping Accurate Books and Records

Preventing Cybersecurity Fraud

Our  
Company.

# Safeguarding Company Assets.

We protect our company assets. They are the building blocks for our future and help us better serve our customers and communities.

## Why It Matters.

McCain's assets are the result of the hard work of our employees, past and present. Our profitability and sustainable long-term growth require that we protect and use our assets wisely.



## Additional Resources

- Global Authority Limits Policy
- Global Corporate Card Policy
- Global Data Breach Reporting Procedure
- Global E-mail Guidelines
- Global Travel and Expense Policy
- Global Acceptable Use Policy

## How We Deliver.

- We always handle McCain assets responsibly and follow McCain policies.
- We take steps to ensure assets are not damaged, abused, wasted, lost or stolen.
- We quickly report any loss, abuse or misuse of assets.
- We follow our Global Authority Limits Policy before approving or executing any contract, agreement or scope of work that binds McCain.
- We ensure payments have appropriate approvals and supporting documentation before processing.

**Our  
Company.**

## Good Business.

**Q**

I can't find my laptop and don't know if it was lost or stolen. I am about to leave for vacation. I plan to address this when I get back. Is this ok?

**A**

*If you think your device might be lost or stolen, do not wait. Report it immediately to the Global IT Security Desk. They can take remote steps to protect McCain from potential theft of valuable electronic data. There may also be privacy issues that need to be reviewed.*

# Protecting Confidential Information.

We respect the sensitivity of non-public information and handle it with care. This includes information that may belong to others.

## Why It Matters.

McCain's confidential information (including financial and other sensitive information) is a valuable asset that gives us a competitive advantage. Its unauthorized use or release can cause the loss of this advantage and damage our business relationships with third parties. We have legal and ethical obligations to protect personal information.

## How We Deliver.

- We collect only the minimum information necessary for our purposes.
- We retain information only as long as it is needed.
- We protect any personal or confidential information that is entrusted to us.
- We limit access to confidential information to authorized individuals with a "need to know."
- We disclose confidential information only with approval and when there is a valid business need.
- We never use confidential information for personal benefit.
- We do not discuss confidential matters in public places or with family and friends.
- We escort visitors while on company premises. We do not allow them to go into restricted areas and we are mindful to keep confidential information out of view.
- We report any concerns promptly.

**Our  
Company.**

## Good Ethics.

From time to time, we receive requests to provide information regarding our business or our industry that are in fact attempts to exploit our confidential information. We never advise any outside party, or accept any consulting work (whether paid or unpaid), without formal approval.

## Good Business.

**Q**

My colleague took a great photo of me. Unfortunately there is a whiteboard with confidential information in the background. **Can I still use it as my internal profile pic?**

**A**

*No. Confidential information must be safeguarded carefully. Only people with a genuine "need to know" should see it. Obtain proper approval before taking photos inside a plant, facility or any place confidential information could be visible. If you did have permission to take the photo, remove or mask the confidential information before you use it, even internally.*

# Keeping Accurate Books and Records.

We maintain accurate financial and business records.

## Why It Matters.

To safeguard our business, we base our decisions on reliable financial and business information. Our shareholders and other stakeholders also require truthful and accurate information.

## How We Deliver.

- We record all business transactions in a complete, accurate and timely manner. We record transactions in the appropriate accounts and departments (cost centres). We never delay or accelerate recording revenue or expenses.
- We ensure no undisclosed or unrecorded funds or assets are maintained.
- We carefully maintain detailed financial records. This includes transactions, timekeeping and expense reports.
- We ensure records are secure and that the appropriate people are given controlled access to them.
- We ensure all internal records accurately reflect the matters recorded.
- We follow policies for management, retention and destruction of records.

**Our  
Company.**

## Good Ethics.

We are committed to a system of internal controls that ensures the accuracy of our records. These controls also help detect and prevent fraud, which is a threat to our company's resources and reputation. If you believe that an entry or payment was incorrectly made or is not consistent with our standards, immediately report the concern. Contact a member of the Legal & Compliance team, your local Finance director or a member of the Global Internal Audit team. You can also report anonymously through any of the channels listed on [page 35](#).



# Good Business.

Q

A coworker asked me to clock in for them. They forgot their cell phone in the car and said they would be right back. **Should I do it?**

A

*No. Each employee must clock in (and out) themselves. This ensures their timesheet accurately reflects the hours they were at work.*

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. Our financial records should be truthful and complete reflections of the company's financial results. You should point this out to your manager and if they continue to insist you alter the records, report it immediately.*



**Our  
Company.**

## Additional Resources

- Global Records Management Policy and Guidelines

# Preventing Cybersecurity Fraud.

We remain vigilant about the risks of cybersecurity threats and how to protect against them.

## Why It Matters.

Cybersecurity risks are increasing globally. We must ensure that we are always careful to prevent unauthorized access to our systems and data. Cybersecurity is everyone's responsibility.

## How We Deliver.

- We act responsibly when using our electronic systems, including by complying with all policies and directions about the use of McCain technology. This includes storing, processing or transmitting data.
- We ensure that only authorized users have access to systems and data needed to do their jobs.
- We protect user IDs and passwords, change them regularly and never share them.
- We keep computer equipment safe and secure at all times. This equipment includes laptops, smartphones and storage devices, whether on or off our premises.
- We ensure that any data stored on removable McCain-issued media (to the extent permitted) is maintained securely.
- We never open suspicious e-mail attachments or follow questionable hyperlinks. We use the [“Report Message” button](#) to report them. We know what “suspicious” and “questionable” mean in this context.
- We only use company email addresses/accounts for business purposes.

**Our  
Company.**



## Good Ethics.

We are always updating our security and awareness programs to keep information safe and avoid fraud. Be aware that “phishing” is a popular method of social engineering. Criminals send bogus emails that appear to be authentic and from legitimate organizations. Embedded links direct the recipient to a hoax website where log-in or personal details are requested. In this way, valuable personal details such as usernames and passwords are stolen. Clicking on links or opening attachments exposes the recipient to viruses. Keep up to date on training and policies to protect against this kind of activity.

## Good Business.

Q

I saw a supervisor using another person's log-in information for our system. They said they were helping out a coworker. Is that okay?

A

*No. All passwords and IDs are employee-specific and may not be shared. Keeping passwords secret and IDs unique protects against unauthorized access. It also allows us to trace and audit activities in the systems we use.*



**Our  
Company.**

### Additional Resources

- Global Data Breach Reporting Procedure
- Global Acceptable Use Policy
- Global Employee Privacy Policy
- Global Privacy Policy
- Global Record Management Policy



# Our Marketplace.

Providing Safe and High-Quality Products

Protecting the Company Reputation

Declaring and Avoiding Conflicts of Interest

Competing Fairly

Preventing Corruption and Bribery

Participating in the Political Process

**Our  
Marketplace.**

# Providing Safe, High-Quality Products.

We produce safe, high-quality products that our customers and consumers can trust.

## Why It Matters.

Our values, behaviours and processes are rooted in high standards of food safety and quality. We take great pride in our brands and in being a trusted supplier.

## How We Deliver.

- We understand our food safety and quality policies. We comply with them at every stage of production, storage and delivery.
- We never take shortcuts, bypass controls or make decisions that compromise food safety.
- We communicate about our products in an honest and ethical manner.
- We always act with honesty and transparency. We proactively raise concerns about any suspected quality or food safety issue.

## Good Ethics.

We are guided by our values to produce delicious, planet-friendly food that is trusted by consumers. We adhere to our own high standards of responsible food safety practices, including where they exceed applicable legal and regulatory requirements.

Our  
Marketplace.

## Additional Resources

- Key Elements of Food Safety and Quality



# Protecting the Company Reputation.

We communicate authentically and honestly. Protecting and enhancing our hard-earned reputation is key to maintaining our success.

## Why It Matters.

We speak with one voice because our customers and communities deserve clear and accurate information. This prevents misinformation from being released that could damage the trust placed in our brands.



## How We Deliver.

- We refer all media requests to [Global External Affairs](#). We never provide comment to the media about McCain unless authorized to do so.
- We consult with Global External Affairs if developing materials that reach a mass audience. This ensures messaging and brand image are appropriate.
- We use social media wisely, making clear that any personal postings are our own individual views. We indicate that we are a McCain employee in our profile if posting about the company. We avoid posting anything that violates our obligations to McCain.
- When permitted to post on behalf of the company, we use approved accounts and messaging.
- We never disclose confidential or proprietary information. We are careful to avoid accidental disclosures (such as in the background of photographs).

**Our  
Marketplace.**

## Additional Resources

- Global Digital and Social Media Governance Policy
- Global E-mail Guidelines
- Global Media Policy

# Declaring and Avoiding Conflicts of Interest.

We declare and manage all actual and potential conflicts of interest. We avoid situations that place personal gain ahead of our obligations to the Company.

## Why It Matters.

We use good judgment to pursue our goals without divided loyalty. This helps us make unbiased, smart decisions that benefit our business. We proactively address conflicts so that others can rely on our unbiased decision-making.

## How We Deliver.

- We avoid situations and activities where personal interests could interfere (or appear to interfere) with our decisions.
- We don't supervise anyone with whom we have a close personal relationship. We also do not influence decisions about the hiring or compensation of any such person.
- We must not be employed by or have a substantial business interest in a competitor.
- We understand that business opportunities that arise in the course of our work belong to McCain, not to us individually.
- We disclose all actual or potential conflicts of interest annually and as they arise.

Our  
Marketplace.



## Good Ethics.

Personal interests could relate to family or close relationships, outside financial interests (including outside employment) or corporate opportunities.

When considering whether there is an actual or potential conflict of interest, ask yourself the following. Do you or a close relation of yours:

- Have a business interest in, or work for, an actual or potential competitor, supplier of goods or services, grower, distributor, agent or customer?
- Work for any governmental authority in a capacity that could impact McCain's business?
- Also work for McCain?

Often the conflict can be managed, as long as it is disclosed. Inform a member of the Human Resources or Legal & Compliance teams if you suspect you may have an actual or potential conflict of interest.

### Additional Resources

- Global Procurement Policy
- Outside Directorships Policy
- Supplier Code of Conduct

## Good Business.

Q

We need to quickly engage a company that provides employee contracting services. My daughter owns a company that provides this service and would offer us a good deal. **Can I hire her company?**

A

*Hiring your daughter's company could create a conflict of interest. Let your manager know about your relationship and remove yourself from the selection process. Your daughter's company may be able to compete along with other vendors, as long as you are not in a position to influence (or appear to influence) the final decision.*

Q

I have been invited to sit on the Board of Directors of a local organization. **Do I need to disclose it?**

A

*Please refer to the Outside Directorship Policy. Depending on your role and the nature of the organization, you will likely need to disclose or obtain approvals before you accept the invitation.*



**Our  
Marketplace.**

# Competing Fairly.

We compete on the value of our offerings and the talent of our people – and never through unethical means.

## Why It Matters.

McCain is committed to vigorous and fair competition. We follow the competition laws where we operate in both the spirit and the letter. Given the consequences involved, we understand that violations of these laws never benefit the Company.

## How We Deliver.

- We follow our Competition Law Policy diligently. We consult with a member of the Legal & Compliance team if we're unsure whether an action is lawful.
- We make business decisions independently of our competitors.
- We never discuss pricing, contract terms, bidding, dividing markets, collective boycotts, limiting production or any other competitively sensitive matter with competitors.
- We immediately report attempts by competitors to have improper or illegal discussions to a member of the Legal & Compliance team.
- We never use illegal or inappropriate actions to obtain competitive information.
- We document the source and date on the face of any competitive materials we receive.
- We ensure that everything we say or write about our business and our competitors is professional in tone. We do not use language that encourages anti-competitive behaviour or disparages third parties.

Our  
Marketplace.



## Good Ethics.

Trade association meetings and industry conferences allow us to keep up on new developments, trends and common concerns. However, because our competitors are there, these gatherings can be risky. We are always mindful that nothing is “off the record” when speaking with competitors. We refuse to participate in anticompetitive discussions.

## Good Business.

Q

I was at a trade association meeting this morning. One of our competitors started to share contract clauses that customers often push back on. They suggested we all hold firm on issues such as delivery rates and penalties. If we agreed, none of us will have to pay penalties. I didn't think that was fair to customers, so I stayed out of the discussion. Did I do the right thing?

A

*You were right not to participate, but that's not enough. In these cases, it's important to make a “noisy exit.” A noisy exit consists of three steps:*

- 1. Announce loudly that you are leaving the meeting, and why.*
- 2. Request that records of the meeting reflect your concern and your departure.*
- 3. Immediately inform a member of the Legal & Compliance team.*

### Additional Resources

- Competition Law Compliance Policy
- Competition Law Guidelines

## Gathering Competitive Information.

We follow our Competition Law Policy diligently. We consult with a member of the Legal & Compliance team when unsure whether an action is lawful.

### DO:

- Rely on publicly available information. This includes published articles, regulatory filings and reputable online posts
- Conduct market research either directly or through external agencies
- Document the source and date of what you collect
- Consult with a member of the Legal & Compliance team if unsure

### DO NOT:

- Seek or accept information if obtained illegally or unethically
- Accept confidential or proprietary information about a competitor from job applicants or employees



Our  
Marketplace.

# Preventing Corruption and Bribery.

We do not engage in any behaviour involving bribery or corruption.

## Why It Matters.

Bribery and corruption are illegal. We live our values of trust and authenticity by preventing bribery and corruption. We do this even if it carries a cost, or we lose an opportunity. No amount of profit is worth the sacrifice of our values.



## How We Deliver.

- We never offer, promise or give anything of value to anyone to gain an improper advantage.
- We don't pay facilitation payments, even if the amounts are small, common or expected.
- We ensure that gifts, whether given or received, are always appropriate. We never give lavishly or to inappropriately influence the recipient.
- We never engage in entertainment or gift-giving that is illegal or improper, or that causes the recipient to violate their own policies.
- We understand the reason for a payment. We confirm it is legitimate and approved according to the Global Authority Limits Policy.
- We keep accurate and complete records of all transactions.
- We know that engaging a third party can increase the risk of bribery and corruption. We are careful when hiring third parties to act on our behalf.
- We never use or permit a third party to do anything we may not do ourselves.
- We know that transactions with governments are covered by special legal rules. It is not the same as conducting business with private companies.
- We ask a member of the Legal & Compliance team for guidance, and report any concerns.

**Our  
Marketplace.**

## Good Ethics.

The risks of bribery and corruption can be higher when we use third parties. This includes agents and any parties who sell products or act on our behalf. We conduct due diligence before engaging them. This ensures they adhere to the same high standards of ethics that we do.

## Good Business.

Q

I work in procurement. A general contractor that we didn't select for a recent project came up to me in the airport. He asked if I had ever thought about starting my own business and said he might invest if I did. I think he was trying to get on my good side, so we would choose him for the next project. I told him I wasn't interested. **Did I do everything I should have?**

A

*It was right not to engage. However, you also need to tell your manager or a member of the Legal & Compliance team. If the vendor is making offers in an attempt to win your favour, he may also conduct business in other unethical ways. It's especially risky since a general contractor is often responsible for hiring others for McCain! We should know not to engage with this vendor going forward.*

### Additional Resources

- Global Anti-Corruption Policy
- Global Procurement Policy
- Supplier Code of Conduct
- Global Authority Limits Policy

## Key Terms.

Here are some important definitions to help you understand bribery and corruption.

**Bribe** – Anything of value offered to improperly influence a business decision or obtain an improper benefit.

**Facilitation Payment** – Anything of value offered to secure or speed up a transaction. This can include paying a government official for getting a permit expedited.

**Government Official** – Includes anyone with the ability to act or make decisions in a governmental capacity. This can include any government officer, employee or representative. It includes any person acting in an official capacity for any level of a government, a supranational or international organization, or a state-owned or controlled enterprise. Also included are: legislative, administrative or judicial officials; law enforcement; employees of public hospitals; candidates for public office; and officials of a political party or other publicly-funded institution. The same rules about bribery and corruption also apply to close family members of government officials.

**Nominal Value** – The value of goods or services not likely to influence, or be perceived to influence, the recipient to provide an unfair business advantage. For the purpose of gifts and entertainment, McCain defines nominal value as CAD \$100 or less. Regional or local leaders can set nominal value to a lower amount where appropriate.

Examples of gifts below nominal value include McCain-branded materials that are provided to customers, such as pens, coffee mugs, water bottles and notebooks.

Our  
Marketplace.

# Participating in the Political Process.

We understand that individual participation in politics can make a difference in our communities. As a company, we engage very carefully in this process.

## Why It Matters.

We believe that an open and robust political process makes for a fairer and more productive society. We also support every employee's right to express their personal beliefs. However, we don't engage in political activity on behalf of McCain unless authorized to do so. We do not give the impression that our individual beliefs are shared by McCain.

## How We Deliver.

- We are always clear that our political views and actions are our own and not McCain's.
- We don't make any direct or indirect political contribution on behalf of McCain without the authorization of the President and CEO of McCain. This includes using McCain resources or facilities for political activities.
- We inform the local External Affairs team if we run for political office to avoid any potential conflicts of interest.

## Good Business.

Q

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

A

Yes. Your personal activity is your business, but you may not use McCain resources without permission. You also can't use the McCain name to advance the campaign.

Our  
Marketplace.





# Our Global Community.

Protecting the Environment and  
Promoting Sustainability

Respecting Human Rights

Supporting Our Communities

Our  
Global  
Community.

# Protecting the Environment and Promoting Sustainability.

We produce food responsibly to ensure a sustainable future now and for generations to come.

Sustainability is at the heart of our purpose as a business. The case for making our food systems more sustainable and resilient has never been more compelling. At McCain, this means reducing our climate impact and supporting the communities where we operate. Together with our partners and growers, we can innovate, tackle challenges and drive positive change.



## Respecting Human Rights.



We are committed to respecting human rights and mitigating any negative impacts. We require our business partners to share in this commitment.

We do not tolerate modern slavery or human rights abuses, such as forced or child labour, or human trafficking, in our own workforce or by our business partners. By operating according to our values, we safeguard human rights in everything we do.

**Our  
Global  
Community.**

# Supporting Our Communities.

We help communities thrive where we live and work.

With many growers and facilities located in rural areas, we are often the largest employer in our communities. We are proud of the role we play as an employer and partner. We're committed to contributing to the competitiveness and resilience of these communities.



**Our  
Global  
Community.**

## Additional Resources

- Global Environmental Policy
- Sustainability Reports
- Supplier Code of Conduct



# Our Resources.

Actions

Our  
Resources.

# Actions.

## Asking Questions.

Our company relies on each of us to speak up. This means we ask questions and seek help when we're unsure of the right thing to do. Speaking up makes us a better company by enabling us to identify and resolve problems early.

## Reporting Concerns.

It is essential that each of us reports any potential violations of our Code, our policies or the law. If you have a concern, report it immediately to one of the following:

- A manager
- A local or global Human Resources representative
- A member of the Legal & Compliance team

If you feel that reporting to one of the above is not an option, you may also report your concerns (with the option to remain anonymous) through the following means:

- Email: [codeconnection@mccain.com](mailto:codeconnection@mccain.com). This email is monitored by our Global Compliance team. Your concerns are kept as confidential as possible, given the nature of the concern and the steps that may be required to investigate it.
- Online: at [www.mccain.ethicspoint.com](http://www.mccain.ethicspoint.com)
- Ethics Helpline: a third-party call centre (where available). The Ethics Helpline phone numbers are on the next page.



**Our  
Resources.**

The Ethics Helpline and website are available 24 hours a day in multiple languages. In some jurisdictions, McCain has adopted whistleblower policies in accordance with local requirements. If applicable, you may also communicate your concerns in accordance with your local policy.

Country	Ethics Helpline Number
Argentina	0800-444-9123
Australia	1-800-551-155 then 888-622-2468
Austria	0800-298956
Belgium	0800-81-975
Brazil	0800-047-4158
Canada	1-888-622-2468
China	400-9-901-429
Colombia	01-800-5-1-80529
France	0800-94-86-69
Germany	0800-7243506
Italy	800-902-912
Japan	0120-914-144
Korea, Republic of South	00744828
Malaysia	0154-600-0006
Mexico	008002530411
Netherlands	0800-020-0781
New Zealand	000-911 8886222468 or 0800 753 253
Poland	800-702-828
South Africa	0800-000503
Spain	900-822-569
Sweden	020-79-4272 or 020-79-0359
United Kingdom	0800-028-6914
United States	1-888-622-2468



Any potential violation of our Code will be investigated appropriately. It is each employee's obligation to cooperate fully and truthfully with any investigation. Any employee who does not cooperate may be subject to disciplinary action.

## No Tolerance for Retaliation.

It takes courage to speak up when something's not right. We depend on all of our employees to express concerns and to report possible violations. Rest assured that the company does not tolerate retaliation of any kind against employees who report concerns in good faith. Employees who support an investigation are also protected from retaliation. If you experience retaliation, report the matter immediately.

## Waivers.

In rare circumstances, following our Code may cause significant hardship. In those situations, you may request a waiver of our Code. Consult with a member of the Legal & Compliance team if you believe you need a waiver.

## Resources.

See your Local HR or Legal Team for global and regional policies, standards and guidelines.



**Our  
Resources.**



**We are McCain.**