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Business Ethics and Legal Compliance Manual

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Welcome to the Pierce Distribution Services Company (Pierce) Business Ethics and Legal Compliance Manual. This document serves as a comprehensive guide to ethical standards and legal compliance that all employees of Pierce must adhere to. Our commitment to ethical business practices and compliance with all relevant laws and regulations is essential for the success and reputation of our organization.

1. Ethical Standards

At Pierce, our commitment to ethical excellence is the cornerstone of our corporate culture. We firmly believe that upholding ethical standards is not just a responsibility, but a moral imperative. Our ethical principles guide us in all our business dealings, ensuring that we maintain the highest standards of conduct and integrity.

1.1. Honesty and Integrity

Integrity is our compass. In every action we take, we are guided by unwavering honesty, transparency, and fairness. Our reputation is built on the trust of our colleagues, clients, and stakeholders, and we take pride in consistently earning and maintaining that trust.

What this means for you: As an employee, you are expected to act with the utmost honesty, truthfulness, and fairness in every aspect of your work. Whether interacting with colleagues, clients, or stakeholders, integrity is non-negotiable.

1.2. Conflict of Interest

Preserving the Company's Interests is paramount. Employees must be vigilant to avoid any situation where their personal interests could potentially conflict with the interests of the company. While it is natural to have personal interests outside of work, it is essential to identify and mitigate conflicts promptly.

What this means for you: If you find yourself in a situation where your personal interests could conflict with your responsibilities at Pierce, it is your duty to promptly disclose this potential conflict to the

HR department. We are committed to addressing conflicts transparently and finding solutions that uphold both your interests and the company's.

1.3. Respect and Diversity

Valuing Every Individual: We embrace diversity and understand that it enriches our organization. Every person, regardless of their background, deserves respect and equal treatment. Discrimination, harassment, or retaliation in any form will not be tolerated within our organization.

What this means for you: Your commitment to respect and diversity is a reflection of your commitment to our organization. Treat every colleague, client, and partner with the dignity and worth they deserve. By fostering an inclusive environment, we strengthen our collective potential.

1.4. Privacy and Confidentiality

Guardians of Trust: Every employee is entrusted with safeguarding confidential company information and respecting the privacy of colleagues, clients, and partners. Unauthorized disclosure or misuse of confidential information is strictly prohibited.

What this means for you: Your role as a guardian of trust is critical. Uphold the highest level of discretion and responsibility when handling confidential information. It is not just a matter of policy; it is the foundation of trust upon which our business relationships are built.

Your Commitment Matters

At Pierce, these ethical standards are not merely words on paper; they are the essence of who we are as an organization. Your commitment to these principles is what sets us apart and ensures our continued success.

2. Legal Compliance

Compliance with relevant laws and regulations is of paramount importance to Pierce. By adhering to ethical and legal standards, we not only ensure the

integrity of our operations but also contribute to a sustainable and responsible business environment.

2.1. Employment Laws

Pierce is dedicated to upholding the highest standards of employment practices. We recognize the importance of adhering to federal, state, and local employment laws to create a fair and equitable workplace for all.

2.1.1. Labor Laws

We strictly adhere to labor laws governing various aspects of employment, including but not limited to:

LABOR LAWS	PURPOSE
Fair Labor Standards Act (FLSA):	Ensuring fair wages, overtime pay, and child labor standards.
Family and Medical Leave Act (FMLA):	Providing eligible employees with job-protected leave for qualified medical and family reasons.
Occupational Safety and Health Act (OSHA):	Ensuring a safe and healthy working environment through compliance with safety standards and practices.

2.1.2. Equal Opportunity

Pierce is committed to providing equal employment opportunities to all employees and applicants without regard to race, color, religion, gender, sexual orientation, national origin, age, disability, or any other protected status. We comply with all anti-discrimination and affirmative action laws and regulations.

2.1.3. Workplace Safety

We prioritize the safety and well-being of our employees. Compliance with workplace safety laws is non-negotiable. We provide regular training, maintain safety protocols, and

promptly address any safety concerns to ensure a secure working environment.

2.2. Environmental Regulations

Environmental responsibility is a core value at Pierce. We understand the importance of safeguarding the environment and are dedicated to complying with all relevant environmental regulations governing our business activities.

2.2.1. Sustainable Practices

We are committed to sustainable business practices, including reducing waste, conserving energy, and minimizing our carbon footprint. Our compliance with environmental regulations extends to:

- **Waste Management:** Proper disposal and recycling practices in accordance with applicable laws.
- **Emissions Control:** Compliance with emissions standards and pollution control measures.
- **Resource Conservation:** Responsible use of natural resources in line with conservation laws.

2.3. Data Protection and Privacy

The protection of sensitive data and individual privacy is paramount. Pierce is fully committed to respecting and complying with data protection and privacy laws and regulations.

2.3.1. Confidential Information

All employees must respect the confidentiality of company and customer information. We comply with data protection laws and regulations such as the General Data Protection Regulation (GDPR) and the Health Insurance Portability and Accountability Act (HIPAA) where applicable.

2.3.2. Data Security

To safeguard sensitive information, we have established robust data protection and security measures. Employees are required to follow data protection and privacy policies and practices to maintain the confidentiality and integrity of data.

2.3.3. Consent and Compliance

Pierce ensures that all data processing activities, especially those involving personal information, are conducted with the proper consent of individuals and in strict compliance with data protection laws. Any breaches or incidents are promptly reported and addressed in accordance with legal requirements.

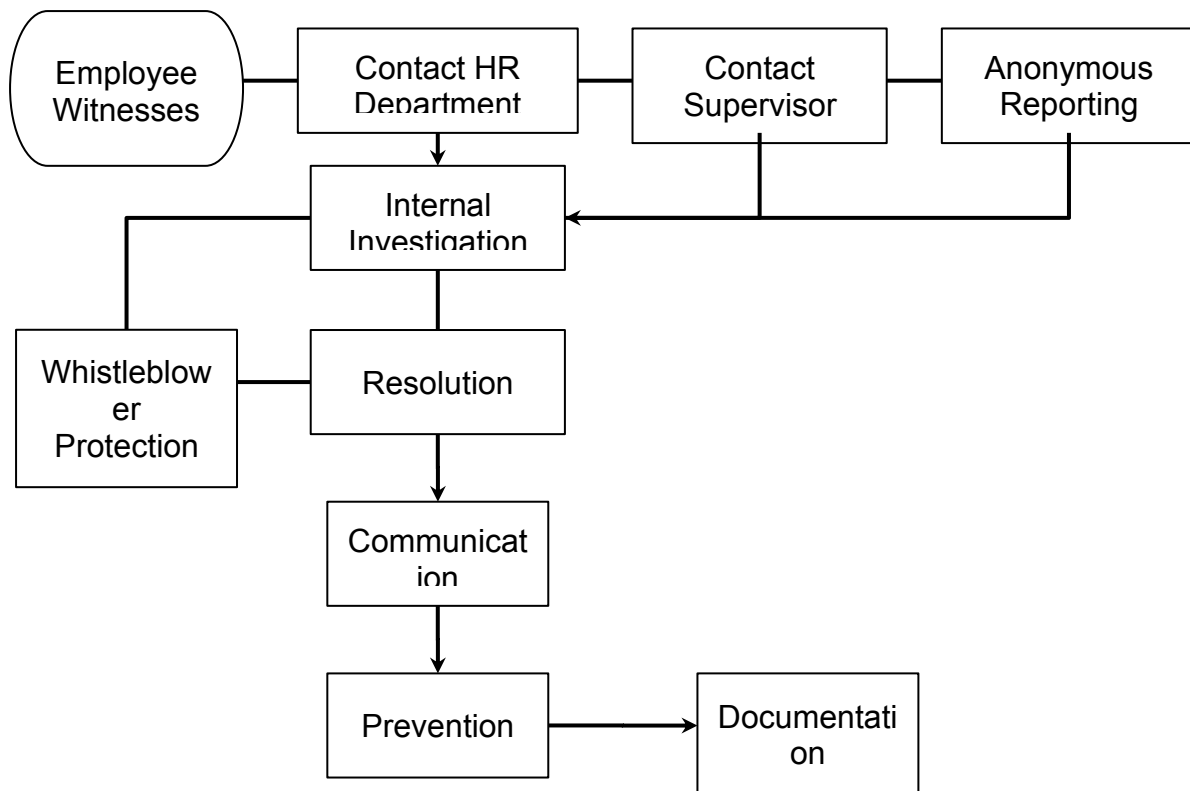
3. Code of Conduct

All employees are expected to adhere to the Pierce Code of Conduct, which outlines specific behaviors and actions expected in the workplace. This code covers areas such as:

AREA	DESCRIPTION
Professionalism	Maintain a high level of professionalism in all interactions with colleagues, clients, and stakeholders.
Dress Code	Comply with the company's dress code policy, ensuring attire is appropriate and professional.
Use of Company Resources	Use company resources, including equipment and facilities, responsibly and solely for business purposes.
Social Media Usage	Exercise discretion and good judgment when using social media, ensuring that personal posts do not reflect negatively on the company.
Alcohol and Substance Abuse Policy	Abide by the company's policy on alcohol and substance abuse, which includes a prohibition on the use of such substances during working hours.

4. Reporting Violations

Employees who witness or suspect violations of ethical standards or legal compliance are encouraged to report such incidents. Reports can be made to a supervisor, HR, or through our anonymous reporting hotline.



4.1. Witness or Suspect Violation:

If an employee witnesses or suspects a violation of ethical standards or legal compliance, they should take immediate note of the details, including the date, time, location, individuals involved, and any evidence if available.

4.2. Contact Supervisor:

The primary reporting channel is to discuss the violation with your immediate supervisor. Employees should feel comfortable approaching their supervisor to report concerns. The supervisor will then assess the situation and determine the appropriate course of action.

4.3. HR Department:

If reporting to a supervisor is not feasible or if the supervisor is involved in the violation, employees can directly contact the HR department. HR is trained to handle such reports with discretion and professionalism. The HR department will initiate an investigation as necessary.

4.4. Anonymous Reporting Hotline:

For situations where employees are uncomfortable disclosing their identity or if they believe their report is not adequately addressed through other channels, Pierce provides an anonymous reporting hotline. This hotline is operated by a third-party organization to ensure confidentiality. Reports made through this hotline are forwarded to the HR department for investigation.

4.5. Investigation:

Once a report is received, whether through a supervisor, HR, or the anonymous reporting hotline, an internal investigation will be initiated. The HR department will lead this process, and if necessary, involve relevant departments or external experts.

4.6. Resolution:

Based on the findings of the investigation, appropriate actions will be taken to resolve the violation. This may include corrective measures, disciplinary actions, or legal remedies, depending on the nature and severity of the violation.

4.7. Whistleblower Protection:

Employees who report violations in good faith will be protected from retaliation. Any form of retaliation against a whistleblower is strictly prohibited and will result in disciplinary action.

4.8. Communication:

After the investigation and resolution process, affected parties will be informed of the outcome, to the extent allowed by law and company policy, while respecting privacy and confidentiality.

4.9. Prevention:

Pierce will take steps to prevent future violations by implementing necessary changes in policies, procedures, or employee training as deemed appropriate.

4.10. Documentation:

All reports, investigations, and resolutions will be documented and retained in accordance with applicable laws and company policies. This documentation is essential for accountability and legal compliance.

5. Whistleblower Protection

Pierce is committed to protecting whistleblowers from retaliation. Employees who report violations in good faith will not face adverse employment consequences as a result of their report.

6. Consequences of Non-Compliance

Violations of ethical standards or legal compliance may result in disciplinary action, up to and including termination of employment. Legal violations may also lead to civil or criminal penalties for individuals and the company.

7. Training and Education

To ensure that all employees understand and adhere to our ethical and legal standards, Pierce provides ongoing training and education programs. Employees are required to participate in these programs as part of their professional development.

Conclusion

At Pierce, we hold a steadfast belief that maintaining unwavering ethical standards and unwavering legal compliance is not merely a choice but an imperative foundation for our enduring success and unblemished reputation. We understand that every employee, regardless of their role or tenure, carries a pivotal responsibility in safeguarding these principles.

Our commitment to ethical integrity and legal adherence extends beyond words on paper. It is the very essence of our corporate culture. By embracing and internalizing the guidelines outlined in this Business Ethics and Legal Compliance Manual, each of us becomes a custodian of our organization's destiny.

We are not merely passive participants but active stewards, collectively weaving the fabric of our company's character. Our dedication to these principles shall not only guide us through daily decisions but shall also shape our long-term trajectory. Together, as a unified force, we shall ensure that our organization continues to flourish, ensuring not just our own success but that of future generations of employees and stakeholders alike.

In the ever-evolving landscape of business, our unwavering commitment to ethical excellence and legal compliance shall stand as a beacon, illuminating the path towards a prosperous and principled future for Pierce.