



STANDARDS OF BUSINESS CONDUCT

Business Ethics and Compliance



Dear Team Members:

At Pilot Flying J, our success has been built on our exceptional team and a work environment where Team Members have a commitment to act with the highest standards of honesty, fairness and integrity, and show respect for one another. Our core values guide our behavior, actions and decisions and living up to these high standards is absolutely critical to our continued success.

Inherent in each value is an obligation and expectation to always be ethical, truthful and dependable. Pilot Flying J's Standards of Business Conduct ("Standards") articulate this commitment and provides the framework for operating in today's environment of complex laws and regulations.

I am personally asking you to commit to following the Standards as a guide for your interactions with our guests, fellow Team Members, business partners, and anyone else with whom you come in contact.

Each of us is responsible for knowing when to speak up, asking tough questions and reporting any possible violation of the Standards. Since no code or policy can spell out the appropriate behavior for every situation, you should talk with your supervisor, or refer to any of the resources listed throughout the Standards, when you have questions or concerns.

Thanks for all you do.

Ken Parent

Ken Parent, President



PILOT FLYING J MISSION, VISION AND VALUES

OUR VISION

Fueling Life's Journeys

OUR MISSION

Connecting People and Places with Comfort, Care and a
Smile at Every Stop

OUR VALUES

Pilot Flying J **SERVES**
YOU & YOUR FAMILY

- **SERVICE**
Guest and Team Members are at the center of everything we do
- **EXCELLENCE**
Working together drives success and opportunity
- **RESPECT**
We value Team Members, celebrate achievements, and appreciate guests
- **VALUES**
Stand for integrity and fairness
- **ENRICH**
We are committed to making a difference in people's lives
- **SPIRIT**
Our family culture encourages passion and humility

GUIDING PRINCIPLES

All interactions will be conducted in compliance with the law and in keeping with high ethical standards. We will act honestly and responsibly in all community and business relationships with guests, suppliers, Team Members, representatives, owners, and others. Our people are expected to abide by these principles and to strive for professional excellence. The foregoing principles are consistent with the specific statements of policy that follow and with the separate policies and procedures of the operating companies.

Look Inside

<u>PFJ Listens</u>	6
<u>Asking for Guidance and Voicing Concerns</u>	6
<u>Anti-Retaliation Policy</u>	6
<u>Workplace Environment</u>	7
How We Treat One Another	7
Workplace Bullying	8
Team Member Relationship	8
Fraternization	8
How We Treat Our Guests	9
Diversity	9
Environmental, Health, Safety and Security	9
Substance Abuse and Weapons	9
Wage and Hour Rules	10
<u>Business Practices</u>	11
Compliance with Laws and Regulations	11
Interaction with the Government	11
Fair Competition	11
Conflicts of Interest and Corporate Opportunities	12
Gifts and Entertainment	12
<u>Intellectual Property and Proprietary Information</u>	14
Confidential Information	14
Other Intellectual Property	15
Protecting the Pilot Flying J Assets and Brand Name	15
Computer Applications and Software	16
System Integrity	16
System Security	16
Personal Use of Pilot Flying J Technology	16
Email Policy	17
Social Media Policy	18
<u>Financial Integrity and Responsibility</u>	19
Spending Pilot Flying J's Money	19
Signing a Contract	19
Purchasing Practices	19
Business Records and Communications	20
<u>Community Involvement</u>	20
Personal Activities	20
Political Activities	20
Public Relations	20
<u>Frequently Asked Questions</u>	22

ABOUT THE STANDARDS OF BUSINESS CONDUCT

Pilot Flying J empowers all partners to make decisions that impact our reputation.

Individual actions at work shape how the world views Pilot Flying J, which is why it's so important that we each take responsibility for our Mission and acting ethically in all situations. Remember, all Team Members should answer this question when considering the Standards of Business Conduct:

Would I be proud to explain my actions to my family or fellow Team Members – or to thousands of people around the world on tonight's news broadcast without hesitation?

The Standards of Business Conduct support our core values and provide an overview of some of the legal and ethical standards we are each expected to follow every day. If you are unsure of what to do in a situation, you have support. Speak to your supervisor, management, HR Zone Manager, the Compliance & Ethics Department, or Law Department and remember any communication in good faith is covered by our anti-retaliation policy covered on page 6 herein.

Please read the Standards carefully at work. If you have any questions, refer to the "PFJ Listens - Asking for Guidance and Voicing Concerns" section of this document.

This information is available in different formats.

PFJ LISTENS - Speak Up! We'll Listen

ASKING FOR GUIDANCE AND VOICING CONCERNS

Pilot Flying J's core values require compliance with the law, as well as ethical conduct. If you feel these standards have not been met, need access to policies, or have any questions, please ask for guidance or voice your concerns by contacting any of the following resources:

- Your supervisor
- HR Zone Manager
- PFJ Listens Integrity Line 1-888-55 PILOT (you may remain anonymous)
- PFJListens.com (you may remain anonymous)
- Compliance & Ethics Office at PFJListens@pilottravelcenters.com or 865-474-2987

Team Members can also seek advice and counsel from PFJ's functional departments such as Human Resources, Finance, Auditing and the Law Department. All Team Members reporting issues will be held in the strictest of confidence by trained professionals in these departments.

The PFJ Listens Integrity phone number is: **1-888-55 PILOT**. The Integrity Line and PFJListens.com are available 24 hours a day, seven days a week and an interpreter for the Integrity Line can be made available upon request. In addition, if requested by the Team Member, the Integrity Line will treat the Team Member's identity and the alleged illegal or unethical conduct as confidential information, and will disclose the identity of such source only as absolutely necessary to comply with legal requirements and to investigate the reported conduct. Those informed of the Team Member's identity shall be made aware of the need for confidentiality. If a Team Member calls anonymously or uses the web portal, he or she will be provided a number to use in identifying his or her inquiry. The group of outside professionals who answer the call will work with each Team Member to get the information PFJ needs to address his or her concern.

If a Team Member is aware of any ethical issue or irregularity, do not attempt to handle an investigation on your own. Ask for help from Compliance & Ethics, Human Resources, Law Department, or contact the PFJ Listens Integrity Line or web portal. Each Team Members' concerns will be taken seriously, and all information provided will be treated in a confidential manner.

ANTI-RETALIATION POLICY

Pilot Flying J has a strict policy against retaliation and does not tolerate retaliation against or the victimization of any team member who raises concerns or questions regarding a potential violation of law, the Standard of Business Conduct or any Pilot Flying J policy that he or she reasonably believes to have occurred.





WORKPLACE ENVIRONMENT

How We Treat One Another

Pilot Flying J promotes equal opportunity in its hiring practices and makes recruiting decisions based solely on job-related criteria. Discriminating against any Team Member or person with whom we do business on the basis of age, race, religion, sex, disability, national origin, sexual orientation, gender identity or any other legally protected status is not permitted and is subject to disciplinary action, up to and including termination.

At Pilot Flying J we treat each other with respect and dignity. You and your ideas create value and success for Pilot Flying J. We must value and respect the unique character and contribution of each Team Member and guest. This means that all Team Members are entitled to a work environment that is free of harassment and discrimination. Failing to treat each other with dignity, respect and fairness is damaging to an effective work environment and could be grounds for termination.

Harassment and discrimination take many forms, including:

- Unwelcome remarks, gestures or physical contact
- The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the internet
- Offensive or derogatory jokes, language or comments (explicit or by innuendo)
- Verbal or physical abuse or threats
- Emails, materials or other communication which includes inappropriate or derogatory, racial, ethnic, or religious slurs or stereotypes

Example:

Q: One of my co-workers emailed an inappropriate joke to me and some teammates. I find it offensive, but I don't know if I should approach my co-worker with my concerns. What should I do?

A: We each have an obligation to ensure that Pilot Flying J is a great place to work for all Team Members and offensive behavior such as this is not acceptable. If you feel uncomfortable speaking with your co-worker directly, contact your supervisor, HR Zone Manager, 1-888-55 PILOT or the Law Department.

Workplace Bullying

Pilot Flying J does not tolerate bullying in the workplace under any circumstances. Workplace bullying is behavior that harms, intimidates, offends, degrades or humiliates a co-worker, subordinate, or supervisor, whether in private or in front of other Team Members, vendors, clients, guests, or other third parties. Any Team Member caught bullying while at work will be subject to disciplinary action, up to and including termination. Examples of workplace bullying include, but are not limited to: continuous pattern of unwarranted or invalid criticism; blame without factual justification; exclusion or social isolation; and name calling, being sworn at, shouted at or being humiliated.

Team Member Relationships

Pilot Flying J discourages Team Members from dating or entering into consensual social relationships with other Team Members. If such a relationship is entered into, Pilot Flying J cautions Team Members not to let such relationships affect their job performance. Team Member relationships are allowed provided: both parties mutually and voluntarily consent to the social or dating relationship; the social or dating relationship does not breach corporate values or these Standards; the social or dating relationship does not involve a supervisor and subordinate (refer to the fraternization policy below in this Standards); and the social or dating relationship does not affect or appear to affect judgment or performance of duties of involved Team Members and those Team Members' co-workers; and/or the social or dating relationship does not negatively impact the common good of Pilot Flying J.

Team Members who do not have a supervisor/subordinate status that choose to enter into any social, dating, personal or business relationships must comply with the following:

- Immediately self-report;
- Review PFJ's policy prohibiting workplace harassment and conflict of interest as set forth in this Standards of Business Conduct;
- Behave professionally at all times, avoiding indiscreet behavior while at the workplace or while on Company time or business including refraining from public displays of sexual affection, sexual innuendo, and suggestive comments and sexually oriented joking.

Fraternization

Fraternization is most commonly thought of as an intimate, sexual or romantic relationship, including the appearance or implication of such as relationship, between a supervisor (includes all leadership positions from shift supervisor on up) and subordinate. It also includes personal or outside business relationships between a supervisor and subordinate that crosses the boundary of the supervisor and subordinate working relationship. Such relationships tend to lead to accusations of discrimination, harassment or the perception of favoritism.

Personal relationships include, but are not limited to: regular non-business social interactions, dating, cohabitation and any type of sexual relationship. Business relationships include, but are not limited to: loaning and borrowing money and business partnerships. Except as set forth below, PFJ strictly prohibits such personal and business relationships between a supervisor and a subordinate of PFJ. To report a relationship prohibited in this Standards of Business Conduct see the Getting Help section of this Standards of Business Conduct.

The personal and business relationships described above between salaried or hourly managers/supervisors and hourly Team Members are prohibited and failure to follow the steps below will result in disciplinary action up to and including termination. Any Team

Member desiring to enter into a personal or business relationship with a supervising or subordinate Team Member must speak discuss the matter with his or her supervisor or the HR department and the Company will determine, in its sole judgment, whether to termination, reassignment, demotion, or transfer either or both Team Members.

Example:

Q: I am a Manager in a Travel Center and the coffee hostess recently approached me to ask if I would like to join her for drinks after work. I told her I did not think this would be appropriate. Do I need to do anything else?

A: Yes. If a subordinate Team Member attempts to initiate a potentially inappropriate relationship with a supervisor, it is the responsibility of the supervisor to make sure the Fraternalization policy is followed and if the behavior is persistent, contact a HR Zone Manager for assistance with the policy.

How We Treat Our Guests

Pilot Flying J's goal is to make life better for America's drivers. We strive to make every guest's experience pleasant and fulfilling, and we treat our guests as we treat one another, with respect and dignity. This means, for example, that we never harass or discriminate against our guests.

Diversity

Pilot Flying J actively creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences, and promotes diversity as a strategic and competitive business advantage for the Company.

As we continue to grow, embracing diversity in every aspect of our business – from the way we work together to the way we procure goods and services – is vital to our long-term success. We respect diversity in each other, our guests and suppliers and all others with whom we interact.

Environmental, Health and Safety

Pilot Flying J is committed to complying with all Federal, state and local laws, rules and regulations (including environmental, OSHA and labor). In addition, Pilot Flying J is committed to providing a healthy and safe workplace. Each Team Member is expected to follow all environmental, health and safety laws, cooperate with officials who enforce these rules and practices, take necessary steps to protect themselves and the other Team Members, attend all required training, and immediately report all accidents, injuries and unsafe practices or procedures. Furthermore, each Team Member must take steps to correct those conditions immediately so as to prevent harm or danger to any guests, fellow Team Members, or the general public.

Substance Abuse and Weapons

Pilot Flying J is committed to a safe workplace free of substance abuse. That commitment is jeopardized when any Pilot Flying J Team Member illegally uses drugs on or off the job, comes to work under the influence, possesses, distributes or sells drugs in the workplace, or abuses drugs or alcohol on the job. The use, possession, or distribution of alcohol (except for consumer sales as allowable by law) or illegal drugs while engaged in work for Pilot Flying J or on Pilot Flying J premises is strictly prohibited. It is also a violation of this Standards of Business Conduct to operate a Company owned or rented vehicle under the

influence of alcohol or drugs, regardless of how slight. Team Members are encouraged to confidentially seek treatment for alcohol and substance abuse problems. Team Members are also encouraged to report instances of violation of this policy and the specific policy contained in the Team Member handbook through the reporting channels found at the end of this Standards of Business Conduct.

Unless otherwise required by applicable law, Team Members may not have or possess any weapon while in a Travel Center, Support Center, dispatch facility or any other Pilot Flying J property. Pilot Flying J takes its rules regarding workplace health, safety and security very seriously. It is essential that you understand and follow them, together with any more detailed guidance provided to you by your supervisor or in other Pilot Flying J policies.

Wage and Hour Rules

Pilot Flying J is committed to following all applicable wage and hour laws and regulations. To help ensure that all worked performed for Pilot Flying J is compensated correctly, Team Members must clock in and out for their schedule shifts. This confirms the number of hours worked during the Thursday through Wednesday work week and provides Pilot Flying J with correct information for calculation of wages. Team Members have the opportunity each week to review and verify the accuracy of their time records and are expected to do so. **Team Members should review his/her time cards weekly and electronically acknowledge same to insure accuracy. If a Team Member disagrees with his/her time entries and/or disputes the accuracy of his/her time card, he/she will be given the opportunity during the electronic verification process to note any objections.** If a Team Member believes that he/she is not being paid for time worked during the workweek, he/she should immediately contact his/her supervisor, Region Manager, HR Zone Manager, Payroll manager or PFJ Listens at 888-55 PILOT or PFJListens.com. PFJ will investigate any concerns brought to its attention and strive to correct any errors with respect to the reporting of time and payment of wages.

Pilot Flying J wants its Team Members to be paid in accordance with the law for all hours worked and takes allegations regarding working off the clock or not being paid overtime very seriously. Asking someone to work off the clock, forcing someone to do so, paying in alternative means other than the payroll system or altering time records to avoid paying for hours worked or overtime is **strictly prohibited** and anyone found to have done so shall be terminated.

With respect to Team Members, Pilot Flying J understands that times may arise that an off the clock Team Member may feel compelled to help in the store or restaurant in order to complete a task or help with guests before his/her shift begins or break is over. While Pilot Flying J greatly appreciates each Team Member's willingness to help when needed, Pilot Flying J cannot allow any Team Member to work without being paid for the time spent doing so. Team Members should always clock in before performing any work. If it is impossible for a Team Member to clock in prior to beginning to work, he/she should document his/her start date in writing, submit the documentation to management so Pilot Flying J's time records can be updated and then review his/her timecard each week to ensure any and all necessary changes have been made. Team Members found to have willingly worked off the clock without documenting the time worked and following the procedures noted herein shall be subject to disciplinary action, up to and including termination.

Example:

Q: Lately, my store has been very busy and it's been hard to find time to do routine cleaning. At this morning's store meeting, our manager told everyone that if they don't complete their tasks before they punch out they will have to stay "off the clock" to do so. Is it okay for our manager to ask this of us?

A: No. Working off the clock is strictly prohibited by Pilot Flying J. Pilot Flying J is committed to ensuring that all Team Members are accurately compensated for all

work performed. Any requests to work off the clock must be reported to the Regional Manager, HR Zone Manager or the Law Department.



BUSINESS PRACTICES

Compliance with Laws and Regulations

Pilot Flying J is committed to full compliance with the laws, rules and regulations of the United States and Canada (and any other country in which it may operate). Team Members must comply with all applicable laws, rules and regulations, including but not limited to the Foreign Corrupt Practices Act ("FCPA"), when performing his or her duties.

When you think a conflict exists between the Standards of Business Conduct and an applicable law, rule or regulation, or if you have a question concerning the legality of your or other Team Member's conduct, you should consult with your supervisor or another party described in the "Asking for Guidance and Voicing Concerns" section of this policy.

Interaction with the Government

Pilot Flying J is committed to complying with local laws, regulations and codes and to working fairly and honestly with government officials and others in our communities. In doing so, our actions must meet high ethical and legal standards. It is against Pilot Flying J's policy (and violates states' commercial bribery statutes) to offer or make a payment or gift of any kind in order to facilitate a local process or to influence a local government official.

If you are contacted by a government or regulatory representative and asked to provide information or submit to an inspection, you should inform your supervisor or the Law Department immediately. Your supervisor or Law Department will take appropriate actions or contact the appropriate department for guidance.

Pilot Flying J's policy is to deal honestly and fairly with government authorities and to comply with valid governmental requests and processes. Team Members must be truthful and straightforward in their dealings with the government and may not direct or encourage another Team Member or anyone else to provide false or misleading information to any government official or representative. Team Members must not direct or encourage anyone to destroy records relevant to an investigation or legal proceeding, or in a situation

where circumstances make it reasonable to assume there is a likelihood that there will be an investigation or legal proceeding.

Fair Competition

Fair competition laws are intended to promote vigorous competition in a free market. It is in Pilot Flying J's best interest to promote free and open competition. Pilot Flying J must make its own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition. We consider compliance with these laws mandatory and of vital importance.

When conducting Pilot Flying J business, all Team Members must:

- Not discuss pricing, production or markets with competitors
- Not set resale prices with guests or suppliers
- Always present Pilot Flying J's services and products in a manner consistent with our core values
- Not induce a third party to breach an existing agreement
- Never act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices
- Not disparage the products or business of competitors, guests or suppliers

Example:

Q: I am going to a trade show. May I go to a competitor's booth?

A: Yes. You may go to the booth and collect any publically distributed material. However, if you talk to anyone at the booth, identify yourself as a Pilot Flying J Team Member, and avoid conversations about business. If you have any questions, a good practice is to consult with the Law Department for guidance before you attend.

Q: A salesperson for a competitor and I are friends. Occasionally we talk about marketing plans. Should I be concerned?

A: Yes. You are revealing confidential information that Pilot Flying J has invested time and money to develop. Also, you are likely violating competition laws that ban discussions of marketing and pricing.

Conflicts of Interest and Corporate Opportunities

Business decisions and actions on behalf of Pilot Flying J must never be influenced by personal considerations or personal or outside relationships. You must never use Pilot Flying J property, information or its position to create personal or family benefit. A conflict of interest may occur when: (1) family members or close personal friends of a Team Member are involved in business matters with Pilot Flying J; (2) Team Members within Pilot Flying J are close personal friends or family members, to the extent that such relationship interferes with sound business judgment being exercised by one or more of the involved Team Members; (3) when a Team Member or a Team Member's family member has a direct or indirect personal or financial interest in any business issue that is under consideration; (4) when outside business interests, or "moonlighting" interferes with a Team Member's ability to do his or her job to the satisfaction of Pilot Flying J; and (5) when a Team Member enters into a business or personal relationship, including fraternization, unrelated to Pilot Flying J business, with a vendor of Pilot Flying J or someone who works with or for such vendor, to the extent such relationship affects a Team Member's ability to make sound business decisions with regard to such vendor or a competing vendor.

A Team Member should never attempt to become involved in a business that may compete with Pilot Flying J nor attempt to acquire an interest in property or other assets in which Pilot Flying J might reasonably be expected to have an interest, without first offering the opportunity to PFJ.

Each Team Member **must** annually disclose to the PFJ Compliance & Ethics Office all actual and potential conflicts of interest as listed above, including those where even the appearance of a conflict of interest may exist. Disclosure and discussion are the best ways to protect against and deal with conflicts of interest.

Example:

Q: I have a relative I'd like to hire to do some work for Pilot Flying J. Since it's a legitimate project that needs to be done, and my relative is trained to do this type of work, is it okay if I hire her?

A: Although the work is legitimate, this situation creates the appearance of a conflict. The circumstances of this situation should be raised with the Law Department so that an independent review can be done prior to committing to a contract. This will help protect you, your relative and Pilot Flying J if the relationship ever comes into question.

Gifts and Entertainment

The exchange of gifts, meals and entertainment is a common practice in business, and can help us build better relationships with guests, vendors and other business allies. One principle is clear and common: no gift, favor, or entertainment should be accepted or provided if it will obligate, appear to obligate or is intended to obligate, or unduly influence Pilot Flying J and/or the Team Member receiving the gift, favor, or entertainment. Consider what other Team Members will think about a Team Member receiving such gift, favor or entertainment and what kind of example such receipt might be setting. The types of gifts and entertainment that are appropriate to give or receive as a Pilot Flying J Team Member depends on many factors. If the gift, meal or entertainment in question is lavish or frequent, or unusual for the receiving Team Member's job, it is probably not acceptable. If a Team Member is in the middle of negotiations or bid evaluations, extra care is required. Never request or solicit personal gifts, favors, entertainment, or services. Never offer or accept gifts of cash or cash equivalents such as securities.

Acceptance of meals, refreshments, travel arrangements, accommodations or entertainment, all of reasonable value, in the course of a meeting to hold a bona fide business discussion or to foster better business relations is permissible under the following guidelines:

- When the expense involved would be payable by Pilot Flying J as a reasonable business expense if it were not paid by the other party; or
- When gifts, services, travel or entertainment exceeding \$100 in value has received approval by the Team Member's immediate supervisor and from one of the following officers: PFJ's President, Chief Financial Officer, Chief People Officer or General Counsel; or when gifts, services, travel and entertainment do not exceed \$100 in value.

You may not encourage or solicit meals or entertainment from anyone whom Pilot Flying J does business or from anyone who desires to do business with Pilot Flying J. Giving or accepting valuable gifts or entertainment might be construed as an improper attempt to influence the relationship.

Example:

Q: May I accept a business meal from a supplier?

A: In most circumstances, modest and infrequent business meals may be accepted. However, whenever a supplier pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. If the meal is offered during contract negotiations, you must always politely decline the invitation. Talk with your supervisor if you are unsure.



INTELLECTUAL PROPERTY AND PROPRIETARY INFORMATION

Confidential Information

During the course of employment at Pilot Flying J, all Team Members gain some knowledge and information that is non-public and belongs to Pilot Flying J. Team Members are trusted with maintaining the confidentiality of this valuable information.

Confidential information regarding Pilot Flying J's operations and business activities is essential to the conduct of our business. We operate in a very competitive environment and our competitors are intensely interested in obtaining Pilot Flying J's financial and operating information. Confidential information includes any information that is not common, public knowledge and/or known to competitors, guests, suppliers, and others (including other Team Members of Pilot Flying J who do not have a valid business reason for obtaining this information). Confidential information includes pass codes and log-in codes used by Managers. Any Team Member who possesses confidential information shall take all steps necessary to safeguard and protect such information from disclosure which include but are not limited to:

- Store confidential information in a secure place and do not leave it out where others can see it.
- Clearly mark confidential information as confidential
- Do not send confidential information to unattended fax machines or printers
- Do not discuss confidential information where others may hear

Confidential information does not include information lawfully acquired or shared by non-management Team Members about wages, hours or other terms and conditions of employment if used by them for purposes protected by § 7 of the National Labor Relations Act or as otherwise protected and permitted under applicable law.

Disclosure of store locations that Pilot Flying J may be building, selling or acquiring, should not be discussed with internal or external parties that are not involved in the projects until construction has begun, in the case of a store being built, or a public announcement has been made by Pilot Flying J, in the cases of stores being sold or bought. In addition, Pilot Flying J does not permit under any circumstances the discussion of future pricing strategy with those outside Pilot Flying J. Please refer to Pilot Flying J's separate Policy Regarding Antitrust Compliance and Policy Regarding Price Discussions for further details.

Pilot Flying J is committed to being fair in the areas of confidential information and materials. Just as we take care to protect our information, Pilot Flying J respects the information of others. Here are some basic rules to follow:

- Do not bring any material from prior employers to Pilot Flying J
- Do not accept or use anyone else's confidential information (or agree to maintain anyone's information in confidence)
- Do not solicit confidential information from another Company's present or former Team Member's or suppliers
- Do not engage in commercial espionage; be transparent in obtaining information about the marketplace

Example:

Q: What is confidential information?

A: Confidential information is all non-public information that might be of use to competitors or harmful to the owner of the information if disclosed. Examples would include information on business plans or operations that are not known to the general public or competitors.

Q: I just returned from a general managers meeting where I learned about Pilot Flying J's exciting new product plans and excellent financial results. I am very proud of Pilot Flying J's success and am eager to share the news. Can I tell my family, or answer questions if a reporter contacts me?

A: No. This information has not been released to the public and is confidential. Unauthorized disclosure could have serious consequences. For example, Pilot Flying J could be placed at a competitive disadvantage or exposed to legal liability. Never disclose confidential Company information to reporters or anyone outside Pilot Flying J.

Other Intellectual Property

As a Team Member, the things you create for Pilot Flying J belongs to the Company. This includes inventions, discoveries, ideas, improvements, software programs, artwork and works of authorship. This work product is Pilot Flying J's property if it is created or developed, in whole or in part, on Company time, as part of your duties or through the use of Company resources or information.

Team Members must promptly disclose to Pilot Flying J, in writing, any such work product and cooperate with the Company's efforts to obtain protection for Pilot Flying J.

To ensure that Pilot Flying J receives the benefit of work done by outside consultants, it is essential that an appropriate written agreement or release be in place before any work begins.

Remember, too, that our brands, including but not limited to Pilot Travel Centers LLC, Pilot Flying J, Flying J Inc. and Pilot Corporation have significant value and recognition in our industry. Each Team Member should act in a manner that enhances and does not detract from the value of our trade names and trademarks. Brands are fragile and must be used carefully and protected from misuse.

When Pilot Flying J uses the work product of others, including art and software programs, we must also be sure to follow the rules relating to properly attributing trademark, service mark, or copyright notices. Written materials and software are subject to copyright protection and should be copied only when permitted. Use caution, as not all protected materials bear a notice.

Protecting Pilot Flying J Assets and Brand Name

Each Team Member is entrusted with Pilot Flying J's assets and honoring that trust is a basic responsibility to each other and to Pilot Flying J. We must protect Pilot Flying J assets from loss, damage, misuse or theft. Theft of property, inventory for sale, equipment or money from Pilot Flying J, vendors or guests will not be tolerated and will be grounds for immediate termination. This includes paid time when compensated by Pilot Flying J. Use of Pilot Flying J assets for purposes other than Pilot Flying J business requires prior authorization by appropriate levels of management. Consult your immediate supervisor about the authorization needed for any non-business use of Pilot Flying J assets.

Computer Applications and Software

The following four directives apply to all computer and electronic systems owned and installed by Pilot Flying J for the express purpose of assisting us in the efficient operation of our Travel Centers, Convenience Stores, Restaurants and Corporate Offices:

System Integrity

Hardware, peripheral attachments, and all installed software on electronic systems owned by Pilot Flying J may not be modified, added to or deleted without the express permission of Technology Services or the Division Director or the Region Manager in consultation with Technology Services. At no time may a Pilot Flying J Team Member use, or allow to be used, any personal hardware or software on any Pilot Flying J electronic systems.

No software program such as but not limited to: audio cd's, internet provider software, screen savers, etc., or any portion thereof, may be copied or transferred from Pilot Flying J electronics systems under any circumstances. No additional communications programs such as on-line or Internet access software may be installed on any Pilot Flying J electronic system. Pilot Flying J telephone access lines may not be used to transmit or receive any data other than authorized Pilot Flying J business-based information.

All Pilot Flying J electronics systems must maintain the original desktop configurations, properties or ".ini." files in order to allow the system to function properly.

System Security

All data entered and stored on Pilot Flying J electronic systems, disks, and tapes is the property of Pilot Flying J and is considered proprietary and confidential. Data stored on these systems is to be treated as such and reasonable steps must be taken in order to protect the information from unnecessary loss, improper modification, or damage.

All data entered and stored on Pilot Flying J electronic systems must be "backed up" or saved on a daily basis. Failure to save this data can result in a serious loss of information in the event of an equipment failure. If a loss of operational data is caused by an individual's negligent failure to save data on a daily basis, it may be cause for disciplinary action, up to and including termination.

Pilot Flying J is consistently working to better protect our systems and data with improved processes and technologies. Any attempts to circumvent the processes and technologies that are in place will result in the appropriate disciplinary action up to and including termination of employment.

In order to protect the confidentiality of Pilot Flying J data, as well as to deter the introduction of outside virus infections, electronic data may not be transferred from one operations facility to another without the prior approval of the Manager of Operations Technology, the Division Director, and the Region Manager.

Personal Use of Pilot Flying J Technology

The use of Pilot Flying J Technology to view or store pornography or visiting any other sites that create a hostile or sexually charged workplace is strictly prohibited. "Surfing" the world-wide web during work hours is prohibited. It amounts to time abuse and subjects Pilot Flying J technology to viruses and spyware. The use of Pilot Flying J Technology to engage in online gambling is also strictly prohibited. E-mail and Voicemail should not be utilized for personal purposes such as, but not limited to, outside business ventures, political or religious causes, or social media. This policy will be treated like all other Pilot Flying J policies, and non-compliance will result in the appropriate disciplinary action up to and including termination of employment.

Example:

Q: I have my own business and do a lot of my business over the internet. I have been using my Pilot Flying J's computer to send e-mail and search the internet for my own business on my lunch break and after work. Is this okay?

A: No. Using Company equipment and/or internet service to pursue or conduct non-Pilot Flying J's business is not acceptable.

E-Mail Policies

The e-mail system (which includes the Internet access and Outlook/Microsoft Exchange Servers) is the property of Pilot Flying J. Pilot Flying J reserves the right to review, audit, intercept, access, disclose, or handle accordingly all messages composed, sent, and received on the e-mail system at any time for any purpose. The contents of any Team Member's e-mail may be disclosed to Pilot Flying J management without the permission of the Team Member when properly authorized and doing so is for a legitimate business purposes. However, unauthorized access of another Team Member's electronic mail is strictly prohibited.

Be selective when addressing e-mail and using DISTRIBUTION GROUPS. As more and more Pilot Flying J Team Members gain access to Outlook/Microsoft Exchange Servers and Intra-Company e-mail, it becomes increasingly important to use the e-mail functionality in the most appropriate way possible. In an effort to use e-mail more efficiently, Team Members should limit message recipients to those on a "need-to-know" basis or an interest in the information provided in the message. Blast emails regarding personal items (such as the sale of tickets for an event by a Pilot Flying J Team Member) are strongly discouraged, as such emails disrupt the efficiency of all Pilot Flying J Team Members. If in doubt, ask your supervisor on whether a "blast" email to numerous Team Members is appropriate.

A Team Member should answer "no" to enabling macros if they receive a file that contains a macro. First, open the file, and view its contents without enabling the macros. Once it is determined that the macros are needed, close the file then reopen the file with the macros enabled. Macros can sometimes contain damaging viruses. If a Team Member has a question whether or not a macro should be enabled or may be damaging please contact the Helpdesk or Desktop Support.

Refrain from creating, sending, or forwarding "chain letters" or jokes in e-mail. If a Team Member receives an unsolicited "chain letter" or joke from an external or internal user, delete it. The content of e-mail can be extremely damaging to Pilot Flying J if it contains statements that you, as a Team Member of Pilot Flying J, would not be proud of if it was

published on the front page of your hometown newspaper. Please be mindful of that standard when creating, sending, or forwarding e-mail.

Please note that Pilot Flying J Team Members have no privacy rights when it comes to use of Pilot Flying J hardware, software or technology.

Social Media Policies

Team Members may maintain personal websites or blogs on their own time (i.e. while not on the PFJ time clock) using their own facilities. Team Members must ensure that social media activities do not interfere with their work. In general, Pilot Flying J considers social media activities to be personal endeavors, and Team Members may use them to express their thoughts or promote their ideas, on their own time and with their own devices, as long as they do not conflict with Company policies or business. In addition, all Team Members should be aware that anything posted on social media is open to the public. As such, violations of the Social Media Policy, including but not limited to posting financial, confidential or proprietary information about Pilot Flying J, defamatory, discriminatory or illegal remarks, falsely representing Pilot Flying J or violating state, federal or local law can result in discipline of the team member, up to and including termination. Please refer to and learn PFJ's Social Media Policy, which is available on Pilot Flying J's HUB under "My Info: Social Media" for explicit rules and instructions on using social media at Pilot Flying J.



FINANCIAL INTEGRITY AND RESPONSIBILITY

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. The money we spend on behalf of Pilot Flying J is not ours; it's the Company's and, ultimately, our owners'. Each person at Pilot Flying J – not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate and internal controls are honored. This matters every time we hire a new vendor, expense something to Pilot Flying J, sign a new business contract or enter into any deals on Pilot Flying J's behalf.

To make sure that we get this right, Pilot Flying J maintains a system of internal controls to reinforce our compliance with legal, accounting, tax and other regulatory requirements in every location in which we operate.

Spending Pilot Flying J's Money

A core Pilot Flying J value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on Pilot Flying J's behalf, make sure that the cost is reasonable, directly related to Company business and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner on Pilot Flying J, always record in our expense reimbursement tool the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission requirements of our Concur system. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your supervisor. Supervisors are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

Signing a Contract

Each time you enter into a business transaction on Pilot Flying J's behalf, there should be documentation recording that agreement, approved by the Law Department. Signing a contract on behalf of Pilot Flying J is a very big deal. Never sign any contract on behalf of Pilot Flying J unless all of the following are met:

- You are authorized to do so under our Financial Approval Authority Matrix. If you are unsure whether you are authorized, ask your supervisor or department head;
- The contract has been approved by the Law Department. If you are using an approved Pilot Flying J form contract, you don't need further Law Department approval unless you have made changes to the form contract or are using it for other than its intended purpose; and
- You have studied the contract, understood its terms and decided that entering into the contract is in Pilot Flying J's interest.

All contracts at Pilot Flying J must be in writing and should contain all of the relevant terms to which the parties are agreeing – Pilot Flying J does not permit "side agreements," oral or written. You should also send a copy of the signed contract to the Law Department for the contract management system.

Purchasing Practices

All purchasing decisions will be based on the best value realized by Pilot Flying J and in alignment with our business standards and goals. Important components of purchasing include competitive bids, partnering arrangements, incentive-based contracts, quality verification, confirming the legal and financial condition of the supplier, and avoiding personal conflicts such as dealing with family members or friends of Pilot Flying J Team Members. The Conflict of Interest Section above should be considered in all purchasing decisions.

If you have been entrusted with a Pilot Flying J Purchasing Card or Pilot Flying J Travel Card, you are bound by the respective card's terms and agreements. The use of the Purchasing Card for purchase of personal items is against Pilot Flying J policy and makes you subject to disciplinary action up to and including termination.

Business Records and Communications

When Pilot Flying J creates or maintains reports, records and communications, the Team Members are also responsible for the integrity of those records. It is against this Standards of Business Conduct to make false or misleading entries in Pilot Flying J books or records. All financial reports, sales reports, expense reports, time sheets, accounting records and other similar documents must be true and accurate to the best of your knowledge and belief. If you are uncertain of the validity of an entry or report, raise your concern to the best source for correcting it, which will most likely be your immediate supervisor. Never allow yourself to be part of a chain of incorrect information. No Pilot Flying J Team Member should ever destroy or alter any documents or records in response to any investigation, suspected investigation, anticipated litigation, litigation or lawful request, whether internal or external. Please refer any external requests for documents to the Law Department.

Employment documentation that is not accurate is also strictly prohibited. Falsification of reports regarding: employment applications; absence from work; claims made about injuries while on the job or on Company premises; claims made under benefit plans provided by Pilot Flying J and falsification of Company communications or time sheets are strictly prohibited and may be grounds for termination from Pilot Flying J.

COMMUNITY INVOLVEMENT

Personal Activities

Pilot Flying J understands the need for balance between work, personal and family life, and we encourage Team Members to be involved in their communities. However, Team Members should not impose their personal beliefs or opinions on other Team Members or represent their personal opinions as those of Pilot Flying J.

You may keep your personal activities outside of the workplace confidential, but always keep in mind that you are a representative of Pilot Flying J. Your conduct can affect perceptions of Pilot Flying J's brand and service.

Political Activities

Many governments have laws prohibiting or regulating corporate contributions to political parties, campaigns or candidates in the form of cash or the use of Pilot Flying J facilities, aircraft, automobiles, computers, mail services or personnel. Team Members who communicate with government officials on issues that affect Pilot Flying J should contact the Law Department to ensure that such activities fully comply with the law and that Pilot Flying J's lobbying efforts are coordinated. We respect the right of each of our Team Members to participate in the political process and to engage in political activities of his or her choosing. While involved in their personal civic and political affairs, however, Team Members must at all times make clear that their views and actions are their own, and not those of Pilot Flying J. Team Members may not use Pilot Flying J resources to support their choice of political parties, causes, or candidates.

Public Relations

All information disclosed outside the Company must be accurate, complete and consistent, and disseminated in accordance with Pilot Flying J's policies. We all represent Pilot Flying J; if someone asks you for information (for example, the media), be sure to notify your

manager or department head about the request and/or direct the person to the Media Relations Manager at corporate headquarters. They will contact the appropriate party to ensure that the correct procedure is followed. Please do not attempt to answer these questions yourself.

The standards and policies stated herein are not all the applicable Pilot Flying J standards and policies nor are they a comprehensive or complete explanation of the laws that are applicable to Pilot Flying J and its Team Members. All Pilot Flying J Team Members have a continuing obligation to familiarize themselves with applicable laws relating to their job responsibilities and all Pilot Flying J policies. Breach of these standards, Pilot Flying J policies or the law may give rise to disciplinary action up to, and including dismissal.

The standards and policies discussed herein may be amended from time to time. Team Members should access the Standards of Business Conduct posted on the employee HUB for the most current version.

Frequently Asked Questions:

Q: What is Pilot Flying J's Compliance & Ethics Office?

A: Pilot Flying J's Compliance & Ethics Office is a department that supports our Mission and Values and helps protect our culture and our reputation by providing resources that help Team Members make ethical decisions at work.

Q: What are Pilot Flying J's Standards of Business Conduct?

A: The Standards of Business Conduct is a resource distributed to all Team Members to help them make appropriate decisions at work. The Standards are a brief statement of some of the Company's expectations of how we are all to conduct Pilot Flying J business.

Q: What am I expected to do with the Standards of Business Conduct?

A: Read the Standards carefully at work and make sure that you understand them. If you have any questions or concerns, ask the Compliance & Ethics office.

Q: What is PFJ Listens?

A: PFJ Listens is a program for reporting issues or raising concerns that involve ethics, legal issues or potential violations of Pilot Flying J policy, including the Standards of Business Conduct and our core values. The PFJ Listens Integrity Line and web portal are managed by a third party, 24 hours a day, seven days a week. In addition to the Integrity Line and web portal, Team Members have several other options to report issues and/or seek advice including contacting the Compliance & Ethics Office at PFJListens@pilotttravelcenters.com or speaking directly to their HR Business Partner or Regional Manager.

Q: What happens when an individual contacts PFJ Listens Integrity Line?

A: Calls to the PFJ Listens Integrity Line are answered by a third party outside of Pilot Flying J. Trained specialists speak with callers regarding their questions or concerns and then forward a report to Compliance & Ethics Office who works with the appropriate party or department for investigation and any appropriate action.

Q: May I contact PFJ Listens anonymously?

A: Yes, you may remain anonymous when contacting the PFJ Listens Integrity Line and web portal. You will be given a unique report number, which will allow you to call the Integrity Line or web portal to check on the status of your report. Calls and submissions through the web portal are not traced and are handled in a confidential manner. However, we encourage Team Members to provide their names and contact information because issues can be more difficult to investigate or additional facts may be needed to appropriately investigate the issue.

Pilot Flying J cannot guarantee anonymity if you identify yourself or give information from which you can be identified, but the Company will take every reasonable precaution to assure that the identity of a caller remains as confidential as possible and only shared on a need to know basis to conduct an effective investigation.

Q: Can I be retaliated against or victimized for reporting or raising a concern?

A: Pilot Flying J has a strict policy against retaliation and does not tolerate retaliation against or the victimization of any Team Member who raises concerns or questions regarding a potential violation of law, the Standard of Business Conduct or any Pilot Flying J policy that he or she reasonably believes to have occurred.