



Holiday Companies

Code of Business Ethics and Conduct

July 1, 2009



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A Message from Holiday Companies' President and Chief Operating Officer



The Holiday Companies Code of Business Ethics and Conduct makes compliance with high standards of business conduct mandatory for every Team Member. Adherence to the principles set forth in this Code is essential to the efforts of the Company to gain and keep the confidence and support of customers, suppliers, regulatory agencies, law enforcement agencies, the courts and the public. Most important of all, compliance is simply the right thing to do: we measure success not just by what we accomplish, but how we accomplish our goals.

The business of the Company is complex and this complexity will only increase in the future. The number of laws, regulations and other legal requirements that affect the Company's business will undoubtedly increase as technology advances and the Company's business efforts become more diverse. These changes will also create new ethical challenges as we adapt ourselves and our business to new situations. In light of these challenges, it is absolutely necessary that the Company have a central set of guiding principles to act as a legal and ethical compass for our employees. This Code provides that compass and every employee will receive a copy.

Our Company has been in business for over 80 years, and over the decades, thousands of individuals have worked at Holiday, building a reputation of excellence and high ethical conduct. These high ethical standards have been a key ingredient to the success of our Company. The Company will continue to adhere to high standards of business conduct. This Code is intended to reflect the ethical intentions of the Company and collective good judgment and common sense of us all. Each employee of the Company is important in determining how Holiday is perceived, and we thank you for your commitment to our high ethical standards.

Regards,

Brent G. Blackey
President and Chief Operating Officer



A. General

1. Introduction

The Code of Business Ethics and Conduct (“Code”) applies to all Holiday Companies (“Holiday” or “Company”) Team Members, the Board of Directors and any consultants or agents doing business for Holiday. If you are an employee with Substantial Discretionary Authority, as defined by the Human Resources Department, you will be required to sign the Holiday Companies Annual Compliance Certification (“Certification”) and return it to Human Resources. Members of the Board of Directors should submit their signed Certification to the Executive Vice President and General Counsel.

The Company’s reputation for high quality customer service and ethical conduct must be protected for the continued success and growth of the Company. Our reputation can be easily damaged by the perception of improper actions. Accordingly, the Company expects all of its employees to conduct themselves with the highest standards of personal and professional integrity at all times, and to be knowledgeable and comply with all applicable laws, rules and regulations. Applicable laws or regulations in conflict with the Code will prevail.



The Code does not and cannot cover all relevant laws or Company policies. The principles described in the Code are general in nature, and you should review the applicable corporate policy for specific instructions and contact your Manager, Human Resources, the Corporate Compliance Committee or the Legal Department when you have questions regarding proper conduct in a particular situation. Any questions regarding the interpretation of this Code or specific Compliance Policies and Corporate Policies will be resolved by the Corporate Compliance Committee.

The Code is one part of the Company’s Corporate Compliance Program, which is organized into three sections:

The Code of Business Ethics and Conduct

This document establishes the Company’s guiding principles for conducting its business;

The Code applies to Holiday Companies, its subsidiaries and affiliates. Any waiver of the Code may be made only by the Board of Directors or a duly appointed Board Committee. The Code is for Holiday’s regulation of its business affairs and does not confer any rights or remedies to a third party. The Code generally describes expected employee behavior and does not purport to be a statement of law.



The Compliance Policies

The policies in the Corporate Compliance Manual which all employees must adhere to; and

The Corporate Policies

Establishes more detailed rules and procedures in specific areas, like compliance with environmental laws and regulations, that are particularly complex.

While each of these components of the Compliance Program has a specific purpose, together they provide an integrated approach to the way the Company will conduct business at every level of the Company.

The information contained in the Code, Compliance Policies or Corporate Policies is not a contract or an offer of a contract. Just as an employee may terminate his or her employment at any time, with or without cause, the Company reserves the same right. This at-will employment relationship may not be modified, unless in a written agreement properly signed by the employee and the Vice President Human Resources.

New Compliance Policies and Corporate Policies may, and likely will, be adopted in the future by the Company. Such policies and plans must be approved by the Compliance Committee. When such Compliance Policies and Corporate Policies are approved, they will be considered to be part of the Compliance Program.

You may request advice or report a concern to your Manager, Human Resources, the Corporate Compliance Committee or the Legal Department. Any Company employee may also confidentially and anonymously discuss or report any concern by calling 1-888-635-2612.

2. Compliance with Laws, Rules and Regulations

You must follow the applicable laws, regulations, rules and regulatory orders of every jurisdiction in which Holiday operates. Each Team Member is charged with the responsibility to acquire appropriate knowledge of the requirements relating to his or her duties to enable him or her to recognize potential dangers and to know when to seek advice from the Legal Department. Violations of laws, regulations, rules and orders can subject an employee to individual criminal or civil liability, as well as to appropriate discipline. Such individual violations may also subject the Company to civil or criminal liability.

3. Holiday's Pledge to You

Following the law is, of course, important, but our Code means much more than that. Throughout our history, Holiday has conducted its business with honesty and integrity and does not compromise these principles for any reason. These are core values to the Company. Holiday highly regards all of its Team Members and pledges that these values are part of our relationship with you. Together, we will continue to build trust and maintain an environment that is open, honest and ethical.



4 Making Ethical Decisions

All Holiday Team Members are responsible for compliance with all laws, rules, standards and principles contained or referenced, directly or indirectly, in this Code, the Compliance Policies and the Corporate Policies. In addition, each employee has an obligation to behave according to ethical standards that exceed the behavior required by law.

There are times when it is difficult to determine whether circumstances are at odds with our Code, and what the individual should do. In guiding an employee in his or her decision-making process, you can ask yourself a number of questions to help guide you:

- Is this action legal?
- Does it seem unethical or improper?
- Is the situation in compliance with Company policies and procedures?
- Are the circumstances consistent with the values of the Company?
- How would this look if it was reported by the news media?
- How would my friends and family react to the situation?

You have a duty to both the Company and yourself to protect our reputation and report illegal or unethical conduct to an appropriate Company representative. Failure to report behavior at odds with our Code may lead to discipline. If in doubt, always resolve a situation in favor of reporting a concern. Any management employee who receives a report of illegal or unethical conduct must take immediate action, including informing a member of the Human Resources Department, the Corporate Compliance Committee or the Legal Department.

5. Retaliation Prohibited

Holiday will not tolerate retaliation against a Team Member for making a good faith report of a known or suspected violation of the law, this Code or any Company policy. If any employee feels that they have been retaliated against, they should immediately report the matter. The Company will take disciplinary action up to and including termination of employment against any employee involved in any type of retaliation.



6. Compliance Procedures

Part of your ethical responsibility to Holiday (and your job!) is to help the Company in enforcing its Compliance Program. You should be alert to possible violations of the law or the Compliance Program anywhere in the Company and are expected to report such violations promptly. Reports should be made to any of the parties listed on page 18. You are also expected to cooperate in any Company investigation of violations by the Company. In addition, any Team Member who is sentenced, convicted or pleads guilty (including a plea of "no contest") to a felony, misdemeanor or (if the position requires driving) a driving offense, whether related to the Compliance Program or not, must report that fact to the Human Resources Department.



Question:

Doreen, a Holiday Commissary Team Member, was traveling on vacation when she became very upset with a police officer following a minor traffic accident. While arguing with the officer, she shoved him and the officer charged her with fourth-degree assault. After pleading guilty and having her sentence suspended, Doreen regarded this as a personal matter and did not want to tell anyone about it, especially her boss. Has Doreen violated any Holiday compliance rules?

Answer:

Yes. All employees of Holiday are responsible to promptly report to Human Resources, felony and misdemeanor convictions.

All cases of suspected violations of the law or the Compliance Program will be investigated, reviewed or reported for legal action, discipline or other corrective steps. Whenever possible, the Company will keep the identities of employees about or against whom allegations of violations are made confidential. To the extent possible, the Company will also protect the identity of the reporting party. Reprisal, retribution or retaliation by anyone within the Company against any employee who has in good faith reported a violation or suspected violation by another is strictly prohibited.

Violations of the law, the Compliance Program, this Code or any Company policies, procedures, instructions, work rules, practices or the like can lead to disciplinary action. The punishment for a violation can include dismissal. In deciding what punishment is appropriate, the Company may consider factors such as, but not limited to, a) whether the employee sought personal or monetary gain, b) whether the employee exhibited reckless disregard of compliance issues or c) whether the employee was involved in a potential criminal infraction. In addition to disciplinary action, the Company may refer a matter to law enforcement authorities for possible investigation and prosecution. The Company may also seek restitution from any employee for losses resulting from the employee's violations.

Disciplinary action may also be taken against supervisors, managers or executives who condone, permit or fail to take appropriate action against illegal, unethical or other improper conduct.



B. Responsibilities to Holiday

1. Conflict of Interest

Holiday Team Members should devote their full energies to their work. Employees who engage in other business activities during non-working hours should be sure that those activities do not interfere with their work at the Company. There are a number of situations where an employee's personal interest may conflict, actually or in appearance, with the interests of the Company or the employee's loyalty to the Company. Such situations could interfere with an employee's ability to make judgments solely in the Company's best interests. Employees who deal with suppliers of goods or services to the Company shall not have any financial or proprietary interest, either direct or indirect, with these suppliers. No employee may solicit gifts from vendors or accept gifts, except as expressly authorized. Executives and managers shall not hold ownership in any competing business or any outside concern which does business with the Company, as specifically explained in a Compliance Policy. The rule to be followed is that in all instances you should avoid entering into situations that could result in even the appearance of a conflict. If you have more specific questions about how a situation that you are involved in fits with this rule, ask your Manager, the Human Resources Department, the Corporate Compliance Committee or the Legal Department.

Sometimes the evolving nature of the Company's business changes a previously acceptable situation into a potential conflict of interest. The Company will not excuse any pre-existing conflict situations, and employees will be asked to discontinue such activities.

2. Corporate Opportunity

No Team Member shall take a business opportunity available to Holiday that the individual learned about in the course of doing their job or use of Company property or information. An example might be purchasing certain real estate that the Company may be interested in acquiring for its operations. As a general proposition, no employee should engage in any activity or become involved in any arrangement where the individual may obtain a financial or other benefit, to the disadvantage of the Company. The same prohibition extends to friends and family members of the employee.

3. Confidential Information

Holiday is dedicated to creating value for its shareholders. That means we must be vigilant to protect the Company's physical property as well as intangible assets such as trade secrets and financial data.

All Company Team Members must protect sensitive and proprietary information from disclosure to individuals outside of the Company who do not have a need to know.



This restriction also applies to the sharing of information between Company affiliates when such disclosure would unfairly disadvantage competitors.

The Company must respect the integrity of the markets in which it operates. To do so, it must ensure that confidential information is protected and that what information is properly disclosed to the public is accurate. Confidential information includes all information, whether technical, business, financial or otherwise, concerning the Company which the Company seeks to protect or is generally not made available in the marketplace. This information must not be divulged except in accordance with established Company procedures and applicable law. Confidential information shall not be used for any employee's personal gain, nor may any employee allow a third party to use or obtain such information. This is true regardless of the information or the manner in which the information is obtained.

4. Improper Use or Theft

Theft, fraud, misuse of the Team Member discount or misappropriation of Holiday, employee, supplier or customer property is a violation of the Code. If you suspect a customer, vendor or fellow employee of violating the Code, please report the matter to your Manager. Alternatively, an individual can leave a confidential, anonymous message at the Incident Report Line at 1-800-767-7166.

5. Accurate Books and Records

Holiday's books, records and all documents, including reports or documents submitted or reviewed by government authorities, must accurately and fairly reflect all transactions and existing operations. The Company will maintain a system of internal accounting controls to ensure that: a) assets are safeguarded; b) transactions conform to management's authorizations; and, c) accounting records are accurate. No Team Member will falsely report transactions or fail to report the existence of false information in the Company's accounting or financial records. Employees signing or certifying the correctness of records and documents, including vouchers, bills, reports and permit applications, shall have knowledge that the information contained in the records and documents is correct and proper.

6. Use of Holiday and Third-Party Software

Holiday and third-party software may be distributed and disclosed only to Team Members authorized to use it. Such software may not be copied without specific authorization, and may only be used to perform assigned responsibilities. All third-party software will be properly licensed. The license agreement for third-party software may place various restrictions on the disclosure, use and copying of the software.



C. Responsibilities to Each Other

1. Equal Employment Opportunity

Holiday firmly believes and is committed to a work environment that promotes principles of equality, opportunity, values, diversity of thought and experience, and is free from all forms of improper employment discrimination. The Company will not discriminate based on race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local commission, disability, sexual orientation, age or genetic information. Other characteristics may be recognized and protected under specific federal, state or local laws, regulations or ordinances. The Company administers its employment policies and practices on a non-discriminatory basis, and all matters relating to hiring, pay, promotions, benefits and terms and conditions of employment.

2. Harassment-Free Work Environment

Every Holiday Team Member deserves honest and respectful treatment. The Company cannot succeed without making the dignity of the individual and respect for privacy the cornerstones of our business. Integrity in the Company's business affairs is necessary to create the positive and professional environment that Company employees deserve.



All employees have a right to work in an environment free of unlawful harassment. Under its Sexual and Unlawful Harassment Policy and Procedure, the Company absolutely prohibits harassment on the basis of race, color, creed, religion, national origin, sex, marital status, disability, sexual orientation, age, genetic information or any other characteristic protected by federal, state or local law.

Included in the above-listed types of harassment prohibited by our Sexual and Unlawful Harassment Policy is sexual harassment. Sexual harassment can include unwanted sexual advances, requests for sexual favors, unsolicited physical contact, propositions, unwanted flirtations or any other offensive verbal, visual or physical conduct of a sexual nature.

3. Diversity

Diversity is necessary for a successful company, especially in an industry that is as competitive as ours. Accordingly, Holiday intends to employ the most qualified individuals available, while reflecting in our Team Member base the multi-cultural communities in which we operate.



4. Safe Workplace

All Team Members are also expected to work in an environment which is safe. It is Holiday's policy to ensure that our workplace is safe and that working conditions comply with all applicable federal and state laws and regulations. Every employee is responsible for ensuring the safety of the Company workplace through personal action and through the reporting of unsafe conditions.

Pursuant to our Workplace Safety Policy and Procedure, any form of threat, threatening behavior or act of violence is also strictly prohibited.

5. Wage and Hour Compliance

Holiday scrupulously follows applicable federal, state and local laws and regulations pertaining to wage and hour issues, including but not limited to pay rates, overtime, meals and rest breaks and child labor. Non-exempt Team Members must accurately record their hours worked each day, and are absolutely prohibited from working "off the clock." Once a non-exempt employee has finished working, that individual must leave the premises after having "clocked out." All managerial employees are strictly required to comply with these wage and hour laws, and may not direct or assist an employee in working "off the clock." Managerial employees are prohibited from changing the time records of a non-exempt employee for any reason except to accurately increase time worked or to correctly enter time worked for an employee that forgot to use the time clocking system.



Question:

Andrea is an Assistant Manager who typically works second shift 3-11 p.m., and is responsible for closing the store. One week, she works 42 hours, but is surprised when her check shows she only got 1.5 hours of overtime. When she raises this with Bob the Manager, he tells her she "took too long" in closing the store on a couple of occasions, so he reduced her overtime by a half an hour. Andrea decides not to "make a big deal" out of it as it is "only a half an hour". Was Bob right doing this?

Answer:

Absolutely not. Bob's actions violated Company policy. Holiday has a strict policy of always paying its employees for all hours worked, no exceptions. Since Bob is violating Company policy, Andrea should immediately report the matter.

Except as otherwise provided by state or local law, non-exempt hourly employees are entitled to overtime pay for "actual hours worked" in excess of forty (40) hours per workweek. Alaska employees are also entitled to overtime for working more than eight (8) hours per day. Overtime pay is calculated at one and one-half (1-1/2) times the employee's regular rate of pay. Paid time off or holiday pay is not "actual hours worked" for computing overtime pay.



Non-exempt employees may not work more than forty (40) hours per workweek unless specifically authorized in advance by their Manager. Non-exempt employees will be paid for all hours worked, and will receive overtime when legally required. However, employees who work overtime without prior approval may be subject to corrective/disciplinary action, including termination of employment.

6. Alcohol and Drug-Free Environment

Holiday is committed to a working environment free of substance abuse. Under the terms of the Workplace Safety Policy and Procedure, all Team Members are prohibited from using, possessing, distributing, manufacturing, storing, selling or being under the influence of illegal drugs or alcohol while on the job or on Company property (including any parking areas). This prohibition does not preclude an employee from using prescription drugs in accordance with a doctor's prescription or over-the-counter medications if they do not prevent the employee from being able to safely perform all the essential functions of employment. No employee is prohibited from selling on behalf of the Company or purchasing alcoholic beverages from Company retail locations if the individual is of lawful age.



D. Responsibilities to Our Customers

1. Fair Dealing in Sales and Advertising

If your job puts you in contact with customers or potential customers, it is critical for you to remember that to these people, you are Holiday. You represent not only the Company, but all other Company Team Members as well. The Company and its employees have provided quality goods and services for many years and have built up goodwill over that time. This goodwill is one of our most important assets, and Company employees must act to preserve and enhance the Company's positive reputation.



No Company employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. Where silence about a fact could be misleading to a customer or others, you must clearly disclose important or material information. Stretching or hiding the truth is unethical and it is not good business.

No Company employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. Where silence about a fact could be misleading to a customer or others, you must clearly disclose important or material information. Stretching or hiding the truth is unethical and it is not good business.

2. Safe Products

Holiday is committed to providing food products of the highest quality to our customers and shall strictly comply with all laws, rules and regulations regarding the preparation, packaging, labeling, quality and safety of our products. Since the food industry is one of the most highly regulated businesses, it is especially important for Team Members to raise concerns about any activity that could threaten the perceived quality of the Company's food products.



Question:

Jason is working an overnight shift at his store. He checks the internal temperature of sandwiches in the sandwich case twice during his shift. Both times he finds products at 50 degrees F. Jason enters the information in the Storefront reporting system and gets a temperature-out-of-tolerance warning. He thinks the products are probably ok and he knows the store manager has been trying to reduce the loss of products, so Jason dismisses the warning and writes a note to the manager about his findings. Did Jason do the right thing?

Answer:

No. Minimizing the costs of product loss is important but should never compromise product safety. Temperature-sensitive products which have sustained a temperature above the acceptable range should be pulled from the case and made unavailable for sale. Leaving a note for the manager was good, but the product should have been pulled.



3. Customer Privacy

To retain the trust of our customers, we must handle customer information safely and securely. All customer information that is shared with us will not be disclosed to any party who is not authorized to receive it or has no legitimate need to know the information. The only exceptions are when disclosure or other use is authorized by the customer, by applicable legal process or by appropriate Holiday authorities.

Customer information includes, at minimum, the individual's name, mailing address, email address, phone number, social security number, credit card number and driver's license number. Federal, state and local laws may be more restrictive.



E. Responsibilities to Our Competitors and Vendors

1. Antitrust and Fair Competition

The highest standards of ethical conduct must be observed in all relationships with our competitors. Holiday will compete not just vigorously and effectively, but fairly as well. The Company must and will comply with all applicable antitrust and pricing laws and requirements relating to unfair competition. To ensure full legal compliance, Team Members should not engage in direct or indirect discussions with actual or potential competitors, including franchisees, regarding competitive issues without prior legal review. Under no circumstances should any of the Company's prices be set for the purpose of lessening competition or driving competition out of business.

Fair competition means competition based on the value of the services which the Company has to offer to its customers. It is the high quality of what we do that succeeds in the marketplace, not criticism of our competitors. It is impermissible to make false, misleading or disparaging remarks about individuals or organizations or their products and services.

In some situations, state law mandates that the Company sell certain products at a predetermined minimum price in an effort to discourage predatory pricing. The Company is diligent about complying with these types of laws and cooperates with reasonable requests for information from regulatory agencies. However, while recognizing the requirement to comply with these laws, the Company also diligently monitors the pricing of its competitors and makes pricing decisions accordingly to remain competitive in the particular market.

There are many other types of conduct that the antitrust or trade regulation laws may prohibit under certain circumstances. There are also situations in which some otherwise suspect conduct may be permissible. The Company understands that these rules are complex and sometimes difficult for employees to understand, so the Compliance Policies and Corporate Policies provide additional details as to how employees should deal with particular situations. Whenever in doubt about the legality of any action, employees should consult with the Legal Department in advance of initiating such action.

2. Vendor Relations, Gifts and Gratuities

Holiday's suppliers, contractors, partners and affiliates make significant contributions to the Company's success. To create an environment where they have an incentive to work with the Company, they must be confident that they will be treated fairly. The Company's policy is to purchase supplies based on quality, service, price and applicable legal requirements. Under no circumstances should any Company Team Member attempt to illegally coerce suppliers into purchasing our products. Employees should not accept excessive gifts, gratuities or entertainment from any



company or person that does business or is seeking to do business with the Company.

Consultants and agents retained by the Company must follow our Code of Conduct and all applicable Compliance Policies in the course of their work on behalf of the Company. It is part of your responsibility as a Company employee to make sure that our agents behave appropriately. Consultants and agents shall not be retained to do anything illegal or improper. What the Company cannot do directly it should not and will not do indirectly by acting through another party.

3. Computer Acceptable Use and Information Security

Holiday has adopted Corporate Policies for Computer Acceptable Use/Information Security and Passwords. These policies were adopted not only to maintain confidential Company information, but also to comply with required security practices by the credit card industry for Customer information. Secure password practices for computer access is an example of the policies that must be strictly followed. It is the responsibility of each Team Member to keep these passwords secret and not share this information with anyone.



Question:

Dawn works in the Home Office in the Credit Department. She is going to the Boundary Waters on a canoe trip and will not have access to her company email account. Dawn is worried about missing some emails about her fantasy football league and some bids she has on Ebay for "Brady Bunch" memorabilia. During lunch with her friend, Nancy, she mentions the problem and Nancy says that she would be happy to monitor Dawn's email, but she would need the password. Dawn quickly agrees. Are they doing the right thing?

Answer:

No they are not. Under Holiday's Computer Acceptable Use and Information Security Policy, the sharing of passwords is prohibited. This is particularly true when one of the employees has access to customer credit information. Also, while "incidental personal use" of a Company computer is permissible, in this case the personal use may be excessive.



F. Responsibilities to Our Communities

1. Age-Restricted Products

Holiday sells many products which are only available for purchase for people of lawful age. These products include tobacco, alcohol, ammunition and certain inhalants such as butane lighters. The Company strictly complies with laws of this nature. Failure to comply with these restrictions can result in criminal liability for a Team Member that makes an illegal sale. Also, the Company is subject to suspension or loss of its license if an employee sells a product illegally. The Company has compliance procedures and plans in place to prevent unlawful sales. For example, it is the policy of the Company to require that each employee request the identification for any individual attempting to purchase tobacco or alcohol who appears to be 40 years of age or younger. In Alaska, every purchaser of tobacco or alcohol must be requested to produce identification, regardless of their age.

2. Environment

Holiday is committed to being a responsible corporate citizen within the communities in which it operates, and it wants its Team Members to be important and constructive members of their communities as well.

The Company recognizes that the need to preserve and protect the vital natural resources of clean air, clean water and land is one of the most important obligations we have to our community. Every employee must assist these efforts by identifying the requirements of and obeying all applicable environmental laws. You must in particular be aware of environmental recordkeeping and reporting requirements specific to your position.



Question:

Bruce, a full-time Sales Associate, notices that a customer who is filling their gasoline tank is standing several feet away from their vehicle talking on their cell phone and not paying attention to the pump. Some moments later, Bruce looks outside and notices that gasoline is spewing out of the customer's tank as the automatic shutoff apparently failed to work. He immediately cuts power to the hose, grabs some absorbent and goes outside. After ensuring no customer comes into contact with the gasoline, Bruce spreads the absorbent around and appears to have contained the spill to the area of the customer's vehicle. After all the gasoline is absorbed, he sweeps up the material and puts it in a plastic trash bag and contacts the Help Desk for disposal instructions. Is this all that Bruce should be concerned about?

Answer:

Holiday may also have an obligation to report this spill to a state agency like the Minnesota Pollution Control Agency, which requires the reporting of spills in excess of five gallons. Five gallons is a very small amount, and Holiday always errs on the side of caution. In this case, the Store Manager should be contacted immediately for further direction.



3. Political Activity and Contributions

Active participation in the political life of your community is a critical part of being a good citizen. But political activity by corporations and corporate employees raise important ethical and legal concerns. Under federal and many state laws, Holiday is prohibited from making “political contributions” to political parties or candidates. The term “political contribution” includes the donation of property or services and the purchase of tickets to fund-raising events, as well as direct cash contributions. Where corporate political contributions are legal in connection with state or local elections, such contributions shall be made only from funds allocated for that purpose and with the written approval of the President and Chief Operating Officer of the Company.

Individual Team Members are encouraged to support their own parties and candidates, but they must do so on their own time and with their own resources. It is improper for an employee to use his or her position within the Company to solicit political contributions from another employee for the purpose of supporting a political candidate or influencing legislation. It is also improper for an employee to make a political contribution in the name of the Company. Employees may make contributions of their own money, but such contributions are not reimbursable by the Company.



4. Charitable Contributions

Holiday is committed to being a responsible corporate citizen in the communities in which it conducts business. To that end, the Company strongly encourages supporting contributions to the United Way. Team Members may donate funds to the United Way through employee deductions. Such contributions are completely voluntary, and are done at the discretion of each individual.

The Company also encourages employees to participate and support community and charitable activities. Such endeavors should be on the individual's own time, using one's own resources and not claiming to be a representative of the Company.

5. Government and Media Requests for Information

Holiday cooperates with every reasonable request by government officials for information needed in an investigation. The Company will not submit false or misleading material to a government agency. A Team Member should immediately report written or verbal requests by government agencies for publicly-available or confidential and proprietary information by contacting the Legal Department.



The Company and its employees are entitled to all safeguards provided by law for companies and individuals involved in investigations. This includes the right to be represented by and consult with counsel as appropriate.

All requests for media interviews must be routed to the Vice President Human Resources. A central point for response is necessary so as to provide a consistent message for all members of the media, including newspaper, television, radio and the Internet. Under no circumstances should any employee speak with a member of the media without prior notification and approval from the Vice President Human Resources.



G. Reporting Concerns and Getting Advice

If you have any questions about the Code, need advice on any issue you are dealing with or you want to report a concern, please send an email to: corporate.compliance@holidaycompanies.com.

In the event that you wish to remain anonymous, you may leave an anonymous voicemail message on Holiday's Compliance Hotline at 1-888-635-2612