

Code of Conduct



 **LAND O'LAKE[®], INC.**

V7:01/17

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>To All Land O'Lakes Employees

Land O'Lakes, Inc. was founded on principles of integrity, fairness, honesty and respect for individuals. Our [Corporate Values](#) speak to these principles, and we recognize that adhering, in an unwavering manner, to these commitments is critical to our continued success. Ultimately, a reputation built on integrity, fairness, honesty and respect is one of our company's most valuable assets. This Code of Conduct is comprised of legal and ethical principles, as well as standards designed to guide our actions. The Code is not intended to be a complete description of appropriate behavior for every circumstance. Rather, it is intended to assist you in understanding the laws and regulations that are relevant to your job, and to provide guidelines for appropriate behavior as a Land O'Lakes employee. Thank you for your commitment to the **Values** of Land O'Lakes, and for protecting the reputation of the company by adhering to this Code of Conduct.



Christopher J. Policinski

President and Chief Executive Officer



> Employee Responsibilities

You must cooperate completely in any investigation relating to Land O'Lakes, and must provide truthful information at all times in connection with any investigation. You may never interfere or obstruct any internal or external investigation relating to the Company.

Each employee is responsible for fully complying with this Code, and for reporting any suspected violations. If you are not sure whether a violation of the Code has occurred (or is about to occur), you should ask yourself:

- Would I feel unwilling, uncomfortable or embarrassed to describe the conduct to my family, friends or co-workers?
- Would I feel uncomfortable or embarrassed if the conduct was described in the newspaper?
- Do I believe the conduct may be illegal or unethical?
- Would the conduct hurt other people, such as co-workers, members or customers?
- Is the conduct the wrong thing to do?

If the answer to any of these questions is “yes” or even “maybe,” then the conduct should not be engaged in or you should report the conduct. If you are aware of a violation or potential violation of the Code, you are expected to report the information.

> I. Maintaining a Respectful, Healthy, Inclusive Environment

Land O'Lakes is dedicated to the principles that all persons should be treated with respect; that all employees should act in a professional manner at all times; and that all employees should have an opportunity to reach their full potential and contribute to the Company's success.



> Diversity/Inclusion

Our U.S. Employee Resource Groups (ERGs) are key elements in our commitment to diversity and inclusion. The ERGs are committed to increasing awareness of the importance of diversity and inclusion throughout the organization and to supporting networking, development, recruitment and retention of diverse talent to drive business impact.

Land O'Lakes is committed to being a high-performing organization built on the foundation of a diverse and inclusive workforce, with individuals and teams working to blend a wide range of talents, experiences and perspectives in pursuit of shared purposes. All employees are expected to fully participate in Company diversity and inclusion programs, initiatives and activities. Employees are also expected to be open to dialogue and to be appreciative of others' efforts to encourage and participate in open and honest communication, as well as assuming the positive intent of others.

> Discrimination/Harassment

- Land O'Lakes is committed to promoting a work environment that values and respects all employees and is free of discrimination, harassment and retaliation. The Company prohibits discrimination, harassment and retaliation by any employee against another employee, a job applicant, a customer or a vendor. Land O'Lakes will not tolerate offensive or inappropriate actions or behavior, including those related to another's race, color, creed, religion, national origin or ancestry, gender, age, disability which is unrelated to ability to perform the essential functions of the position, veteran status, marital status, citizenship status, sexual orientation, gender identity or expression, pregnancy, genetic information, or status with regard to public assistance, or other classes protected by federal, state or local law.
- Behavior that has the purpose, effect or potential of creating a hostile, offensive or intimidating work environment for any employee – or that interferes with work performance in any way – is inappropriate, unacceptable and not tolerated by the Company. This applies equally to employees' conduct on Company premises, as well as behavior off the Company's premises that negatively affect another employee's work environment.
- The Company prohibits retaliation against anyone who makes a good faith complaint or who reports or otherwise acts in good faith to uphold Company policies or this Code of Conduct.

> Workplace Violence

- Land O'Lakes does not tolerate any type of workplace violence or threats of violence committed by or against employees, customers, vendors or guests.
- Prohibited workplace violence includes: causing physical injury to another person; hostile physical contact; making threatening remarks or gestures (including using electronic means to communicate threats); aggressive or hostile behavior that creates a reasonable fear of injury, subjects another person to emotional distress, or is intended to instill fear in others; damaging property of the Company, employees or others.
- Possession of a firearm, explosive device or other weapon on Company property is prohibited unless specifically authorized in advance and in writing by the General Counsel.

> Workplace Health and Safety

Land O'Lakes is committed to providing a safe work environment. The Company requires employees to follow all Company policies and practices relating to workplace health and safety, as well as all applicable laws, rules and regulations. It is every employee's responsibility to immediately report workplace accidents, injuries, hazards, broken equipment and unsafe practices or conditions.

It is Land O'Lakes policy to maintain a safe and drug-free workplace. While on Company time, Company premises or while operating Company-owned equipment or vehicles, employees may never use, sell, purchase, transfer, manufacture or possess illegal drugs or drug paraphernalia. Further, employees may never be under the influence of any substance that impairs safe and productive work performance when conducting Company business or when on Company property.

Employees may not possess, serve, or consume alcohol while operating Company-owned equipment or vehicles. Except as noted below, Employees may not possess, serve, or consume alcohol while on Company premises. Further, employees may never be under the influence of alcohol

(where such influence may impair safe and productive work performance) when conducting Company business or while on Company property. Employees with safety-sensitive positions may not consume alcohol within four (4) hours before the time they are scheduled to report to work or during any work period, including breaks.

Alcohol may only be served and consumed at functions on Company premises if authorized by the Senior Vice President, Human Resources, and the General Counsel. Alcohol may be served and consumed at external events where employees are representing Land O'Lakes. Alcohol should only be served by a person (or entity) that is licensed and trained to serve alcohol. Alcohol may never be served to any person under legal age or to any person who is obviously intoxicated. Consumption at any such event by those employees of legal age is completely voluntary, and should always be in moderation and never in a manner that would embarrass the Company or harm the Company's reputation.

> Confidentiality

- Confidential information consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records and any non-published financial or other data.
- Land O'Lakes' continued success depends on the use of its confidential information and its nondisclosure to third parties. Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment.
- Furthermore, employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information. Employees shall also protect confidential information that they have obtained in the course of their prior employment.
- Land O'Lakes obtains and retains personal information about its employees and customers in the normal course of business, including social security numbers, bank account numbers and personal addresses and telephone numbers. Federal and state privacy laws require that the Company protect the private information of its employees and customers. Note that this policy does not prohibit an employee from voluntarily choosing to discuss or disclose his or her own wage or salary information.
- Employees should never access, obtain or disclose private information of another unless they have appropriate approval, they are acting for legitimate business purposes and they are acting in accordance with applicable laws.
- In the event private information that was in the Company's possession is stolen or inadvertently disclosed to an unauthorized person, the Law Department should be contacted immediately.

> Misconduct off the Job

Employees must avoid conduct off the job that could impair work performance or affect the Company's reputation or business interests.

> Social Media

Employees who utilize social media on behalf of the Company or in a manner that makes reference to the Company must follow [Social Media Policy A157](#) as well as these four basic principles: (1) be transparent that you are a Land O'Lakes employee; (2) don't discuss confidential or proprietary Land O'Lakes information; (3) be respectful; and (4) ensure that your statements are honest, accurate and factual.

The Company believes that social media is an effective tool to stay connected with new trends and topics, to share information and perspective and to create goodwill for the Company and its businesses. However, if not used appropriately, social media use can create reputational and legal risk for the Company. Only authorized persons can make statements on behalf of the Company.

> Business Communications

Communication is essential to Land O'Lakes business. However, inappropriate communications may create legal risks for the Company. The use of e-mail, instant messaging, text messaging and the like has increased the speed and ease with which we can communicate, however that speed and ease of communication heightens legal risk if employees do not use good discipline in creating business communications.

Characteristics of good business communications include:

- (1) the communication is focused on a single topic;
- (2) the communication is formal, factual, clear, concise and truthful; and
- (3) the communications is written in such that it would not cause embarrassment if the communication were published in a newspaper.

Further, appropriate business communication must avoid:

- (1) the use of discriminatory, offensive, insulting or obscene statements;**
- (2) the use of sarcasm or humor (due to concerns regarding misinterpretation);**
- (3) guilt complex words such as 'destroy after reading'; and**
- (4) antitrust red flag words, such as 'dominate' or 'monopoly'.**

Further, business communications received from third parties that are either inappropriate or involve litigation matters should be immediately directed to the Law Department.



Environmental Sustainability

It is Land O'Lakes policy to abide by all applicable environmental laws and regulations. Land O'Lakes recognizes that environmental sustainability is inherent in our values as a cooperative system, and our vision embraces responsible stewardship of the earth. The Company is committed to conducting business in a manner that is socially responsible, scientifically based, economically sound and that will feed more people with fewer resources. Additionally, we are committed to reducing the impact of our operations on the environment – protecting our natural resources for current and future generations.

> Corporate Social Responsibility

Land O'Lakes is dedicated to being a good corporate citizen, being a leader in its local and global communities, being a responsible and responsive employer, operating in an environmentally sensitive manner and maintaining an unwavering commitment to honest and ethical business practices.



> II. Compliance with the Law

Land O'Lakes employees are expected to fully comply with all applicable laws, rules and regulations wherever they do business. Employees may not use a consultant, broker or other third party to do anything they are prohibited from doing themselves. Ignorance of the law, demands of the business, and pressure from co-workers are not excuses for violating the law.

> Slavery and Human Trafficking

- Land O'Lakes is committed to eliminating slavery and human trafficking in its supply chains.
- Land O'Lakes employees will not use involuntary labor, whether bonded, prison, military, compulsory or indentured labor, including debt servitude with respect to any aspect of its operations.
- Land O'Lakes employees will not employ child labor, consistent with the principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work and will endeavor to require the same of its suppliers.

> Antitrust Laws

Land O'Lakes is committed to the continuation of free enterprise and the legal and regulatory framework that supports it. Land O'Lakes employees must recognize the importance of and fully comply with the laws that prohibit restraints of trade, predatory economic activities and unfair or unethical business practices.

In all business dealings with customers, suppliers and competitors, Land O'Lakes employees must:

- Engage in activity and behavior that is consistent with the [Land O'Lakes Antitrust Policy A165](#) and [Land O'Lakes Antitrust Compliance Program Guidelines](#);
- Compete vigorously and with integrity;
- Treat all customers and suppliers honestly and fairly;
- Avoid any unfair and deceptive practices and always present our products and services in an honest and forthright manner; and
- Never comment on a competitor's product without a good basis or need for such statement.

> Relations with Competitors

- The objective of antitrust laws is to promote open competition. Competition functions best when companies make their own independent business decisions.
- Therefore, discussions or communications by a Land O'Lakes employee with a competitor concerning past, present or future bids information, input cost, sales, prices, pricing policies, discounts, promotions, terms or conditions of sale, customers, territories or markets, inventories, production plans or market surveys is generally prohibited.
- Except for very narrow exceptions that must be approved by the Law Department, there must never be any agreement with a competitor relating to any of the subjects described above. This includes not only formal written agreements, but also oral agreements, tacit understandings, and informal, so-called "off-the-record" understandings.

> Trade Associations/Industry Meetings

Trade associations and industry meetings perform useful and legitimate functions in areas such as governmental relations and education. Given that trade associations and industry meetings are collections of competitors, there is an inherent antitrust risk if formal or informal discussions among competitors involve any prohibited topics.

It is the responsibility of business units to ensure that its team members are complying with [Trade Association and Industry Event Certification Program Policy A116](#) and its processes to ensure that Vice President approval is received *before* attendance at an industry meeting.

> Capper-Volstead Act

The Capper-Volstead Act provides for a very narrow exemption to what might otherwise be a violation of federal antitrust laws. Capper-Volstead provides an exemption for persons engaged in the production of agricultural products that allows them to collectively process, handle and market their products, including agreeing on the prices for their products. Capper-Volstead protection may be lost if all members of an association do not meet the requirements of the Act.

The Law Department must be consulted if activity is contemplated that could be a violation of antitrust laws, but for a claim of the Capper-Volstead exemption.

> Pricing

Land O'Lakes prices must be determined independently, in light of relevant economic factors. Land O'Lakes products must not be sold at unreasonably low prices or below cost for the purpose of limiting or eliminating competition (the definition of below cost varies among states and may include all variable costs, including promotional spending).



> Price Discrimination

Land O'Lakes products are to be priced to all competing customers on a fair and equitable basis, without discrimination in price unless:

- (a) a lower price is justified by a demonstrable cost savings to Land O'Lakes (and then only to the extent of the actual, demonstrable cost savings); or
- (b) it is believed, in good faith, to be necessary to meet an equally low price of a competitor.

> Anti-Corruption

Any payments made to government officials, whether referred to as facilitating payments or otherwise, require review and approval of the Law Department in accordance with Company Anti-Corruption policies and procedures.

Paying (or offering to pay) directly or indirectly money or anything of value (including the offer of money, favors, gifts or entertainment) to a foreign official to obtain or retain business can be viewed as offering or receiving bribes and is strictly prohibited.

Although it may be permissible in some countries to provide minor gratuities due to the customs and/or laws of that country, these gratuities can never be used in any manner to give Land O'Lakes an improper advantage in the marketplace.

All employees should be aware that United States anti-corruption laws apply even if the entire activity takes place outside of the United States. Also, many countries have enacted their own anti-corruption laws. Likewise, an affiliate or a third party acting on behalf of the Company could cause the Company to violate anti-corruption laws – even if no Company employee was directly involved in any payment. Employees must ensure that their actions comply with anti-corruption laws and that all actions of any person or entity that they oversee also comply with these laws. Contact the Law Department for further guidance.

> Trade Regulations

Failure to comply with trade regulations can lead to significant monetary damages, tarnishing of our brands and reputation, confiscation of our products, and denial of import/export privileges.

Land O'Lakes is committed to complying with customs and trade regulations where we do business by adhering to export and import laws, understanding and abiding by U.S. trade restrictions, and by reporting on boycott activities. Before engaging in international trade activities, consult with the Import/Export Compliance Department and the Law Department.

> III. Maintaining Integrity and Fairness

Land O'Lakes reputation is influenced significantly by the actions and integrity of its employees. Employees must avoid any relationships or activities that might impair – or be perceived as impairing – their ability to make objective and fair decisions when performing their job.

Consult the [Conflict of Interest Policy \(A120\)](#) for more in-depth information on conflicts of interest.

> Conflicts of Interest

- Employees may not supervise family members or participate in the selection, evaluation, or promotion of family members.
- Employees may not participate in the selection process of, or manage a relationship with, a person or company that is owned by or employs an employee's family member.

Consult the [Conflict of Interest Policy \(A120\)](#) for more specific guidance.

> Employment Outside the Company



- Employees who wish to serve on the Board of Directors of a for-profit enterprise must have that service pre-approved by the Chief Executive Officer.
- Employees may not engage in any outside business interest that is substantial enough to create concern about the employee's ability to devote sufficient time and attention to their job.
- Employees must seek approval before they work in any capacity for a competitor, a company in the same line of business as Land O'Lakes, or for a company that does business with Land O'Lakes (such as a customer, supplier, vendor, etc.).
- Consult the [Conflict of Interest Policy \(A120\)](#) for more information on this topic.

> Insider Trading

Land O'Lakes requires employees to fully comply with all laws designed to protect investors with respect to the use and disclosure of material, non-public information – regardless of whether the information relates to Land O'Lakes or another company with publicly traded securities. Securities laws prohibit individuals who possess material, non-public information relating to a company with publicly traded securities from using such information for the individual's own benefit or from sharing the information with others.

Employees should not disclose any confidential information regarding the Company to anyone outside of Land O'Lakes, including their spouse, children, parents or siblings.

> Gifts and Entertainment

- Gifts and entertainment can create a real or perceived conflict of interest when they inappropriately influence a relationship, appear to influence a relationship, or create a sense of obligation.
- Employees may only provide or accept a gift, or participate in business entertainment, as outlined in the [Conflict of Interest Policy \(A120\)](#)
- Gifts or entertainment to or from a public official must be approved in advance by the Law Department and Governmental Relations.

Consult the [Conflict of Interest Policy \(A120\)](#) for specific guidance on gifts and business entertainment.

> Personal Financial Interest

Employees must disclose certain levels of financial interest (including loans) that they or certain family members have in any of the company's competitors, companies in the same line of business, or companies with whom Land O'Lakes does business.

Consult the [Conflict of Interest Policy \(A120\)](#) for more information on personal financial interests.

> Community and Political Involvement

Any contact with government for the purpose of influencing legislation, regulations or decision-making may constitute lobbying and may require special registrations or disclosures. If you are acting on behalf of the company and believe your actions could have political implications, contact the Government Affairs and Law Departments.

It is one of the Company's core values to be a leader in its communities. Land O'Lakes respects the right of individuals to participate in community, civic and political activities, however, decisions about contributing time, money or resources of their own to any community or political activity is an individual decision to be made by each employee.

Employees acting for or on behalf of the Company shall not make any contributions of Company funds to, or pay expenditures for, any office seeker, officer holder, campaign committee, political party or organization.

Land O'Lakes strives to develop and maintain relationships with elected and appointed public officials and government agencies. We respond to appropriate government requests for information relating to taxation, licensing, food safety, occupational safety and health, labor practices, environmental protection, and all other regulated areas. And we are actively involved in public policy issues. While you may be responsible for handling these types of issues, you should not represent the company or company views on legislative, regulatory or policy issues unless you have approval in advance from the Government Affairs and Law Departments.

> Sales and Marketing Practices

Land O'Lakes requires that all sales, marketing and promotion materials always be honest and accurate. Deceptive advertising and questionable promotional activity is unauthorized and unacceptable. All sales, marketing and promotional materials intended for external use (including labels, packaging, trade and consumer advertising) must be reviewed and approved prior to use by the appropriate business unit or functional leaders and the Law Department.

The excellence of Land O'Lakes products and services is the foundation of the Company's competitive strategy. All sales, marketing and promotional materials should focus on the merits of Land O'Lakes products and should refrain from focusing on competitors' products. However, if any statement is made regarding a competitor's product, the statement must be accurate, supported by appropriate data, and approved prior to use by the appropriate business unit or functional leaders and the Law Department.



> IV. Protecting Company Assets



> Management of Records



Land O'Lakes requires that all reports, documentation, financial statements and other business records are accurate and conform to all legal requirements, generally accepted accounting principles and the Company's internal control processes. It is the responsibility of every employee to ensure that business records do not contain any false or misleading information. Employees are required to cooperate in audits of Land O'Lakes business records.

Business records, whether in paper or electronic form, must be maintained in accordance with the Company's [Record Management Policy](#) and [Retention Schedule](#). In addition to retention according to the schedule, business records must be held when the Company knows of threatened or pending litigation relating to the records, or is otherwise legally required to retain the materials.

> Use of Information and Computing Assets

Land O'Lakes' information is a critical asset of the corporation. All Land O'Lakes employees have access to Land O'Lakes information and are responsible for safeguarding and ensuring the accuracy of such information. Land O'Lakes Information is governed by these principles:

- Land O'Lakes assets (including computers, e-mail and Internet access) must be used in a manner consistent with this Code and other Company policies, including those relating to harassment and discrimination.
- Users of Land O'Lakes information and computing assets must comply with federal, state and local laws, including but not limited to, copyright, defamation, and privacy.

- Land O'Lakes information must be used only for legitimate business purposes.
- All use of Land O'Lakes information and computing assets must comply with all Land O'Lakes information technology standards.
- Limited and reasonable personal use of computing assets is permitted if such use complies with Company policies.

Land O'Lakes has implemented technological tools designed to promote compliance with technology standards and information protection policies. However, those tools do not replace each user's responsibility to comply with all such standards and policies.

> Protection of Information

- Employees must protect Land O'Lakes information from unauthorized activities, including disclosure, modification, copying, deletion and usage. Users must take reasonable precautions to protect computing assets from theft, damage, or misuse. Land O'Lakes will monitor information and computing assets use (including email and other network activity) in a manner consistent with applicable laws.
- Land O'Lakes prohibits the unauthorized use of sound recorders, cameras, video recorders, or video streaming equipment, including any such devices found in cell phones, smartphones or streaming devices such as Google Glasses.
- If an employee suspects or knows of the unauthorized use of recording or streaming devices, the employee must **immediately** report the activity. Employees can report such activity to Human Resources or make an anonymous report through our Connect! Hotline.

Employees are responsible for safeguarding the Company's intellectual property rights.

This includes:

- Using all Company trademarks in an approved and appropriate manner;
- Not disclosing trade secrets to any unauthorized persons or without the protection of a non-disclosure agreement; and
- Reporting to their supervisors any new product, technology, unique solution to a business issue or other idea that an employee develops in the context of their employment by the Company.

> V. Making a Report & Asking Questions

Land O'Lakes employees can ask questions, voice concerns or report violations several different ways, but your direct supervisor is likely the best place to start. If you are uncomfortable speaking with your supervisor, you can contact your HR representative, a member of the legal department, email the President's Inbox or make a report through our Connect! Hotline.

Through Connect!, anyone can make an **anonymous** report. Whether or not you identify yourself, Land O'Lakes prohibits retaliation against employees who, in good faith, submit information or participate in investigations. While you can always remain anonymous, the report, itself, will be kept confidential to the extent permitted by law and by the Company's need to properly investigate the situation.

Call Connect!

US & Canada Toll-Free

1-855-TELL LOL or
(1-855-835-5565)

International Employees Toll-Free

Call Collect at 470 219 7131

1. Dial an Operator
2. Ask to call 470 219 7131 collect

Email

Email Connect!:

Connect@tnwinc.com

Email the President:

1. Click here:
[President's Inbox](#)
2. Or send email to:
President'sSuggestionBox@landolakes.com

Web Reporting

Click here: [Connect!](#) Or go to:

<https://reportlineweb.com/landolakes> (Domestic)

<https://iwf.tnwgrc.com/landolakes> (International)

> Signature Page

By signing below, I indicate my understanding and agree to abide by the terms of the Land O'Lakes Code of Conduct.

Employee Signature

Employee Printed Name

Employee ID Number

Date

This Code of Conduct is not an employment agreement. Adherence to the standards of the Code is a condition of continued employment. The Code does not confer upon any employee rights of any kind. The Code may be changed at any time by the Company without notice.

> Appendix – Web Addresses

- **Business Entertainment Approval Form**
<https://thesource.landolakes.com/policycenter/Documents/Business%20Entertainment%20Approval%20Form.docx>
- **Conflicts of Interest**
<https://thesource.landolakes.com/policycenter/Pages/A120-Conflicts-of-Interest.aspx>
- **Connect! Web Reporting**
<https://thesource.landolakes.com/company/Pages/Raise-a-question-or-concern.aspx>
- **Corporate Values**
<https://thesource.landolakes.com/company/Pages/Values--Vision.aspx>
- **Gift Approval Form**
<https://landolakes.service-now.com/Legal/main.do>
- **Land O'Lakes Anti-Trust Policy A165**
<https://thesource.landolakes.com/policycenter/Pages/A165-Antitrust.aspx>
- **Land O'Lakes Antitrust Compliance Program Guidelines**
<https://thesource.landolakes.com/policycenter/Documents/Anti-trust%20Compliance%20Program.pdf>
- **President's Inbox on Intranet**
<https://thesource.landolakes.com/Lists/Presidents%20Inbox/NewForm.aspx?IsDlg=1>
- **Record Management Policy**
<https://thesource.landolakes.com/policycenter/Pages/A154-Records-Management.aspx>
- **Retention Schedule**
<https://thesource.landolakes.com/Workplace/Pages/Records-Retention-Schedule.aspx>
- **Social Media Policy A157**
<https://thesource.landolakes.com/policycenter/Pages/A157-Social-Media-new.aspx>
- **Trade Association Policy A116**
<https://thesource.landolakes.com/policycenter/Pages/A116-Trade-Association-and-Industry-Event-Certification-Program.aspx>