



Maple Street Biscuit Company
Agincourt Industries, LLC

Code of Business Conduct and Ethics

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Message from Leadership

Since opening our first community store in 2012, our mission has been simple: Help people, serve others, and be part of the community. We do this through “Gracious Service.”

“Gracious Service” is more than just one of our Core Principles; it’s our promise to create and cultivate a culture of showing grace by serving others, including our guests and team members. Gracious Service, along with Maple Street’s other Core Principles: Comfort Food with a Modern Twist, Made Consistently; Immaculately Clean, and Sustainable Business, are the standards that we use for everything we do, including how we conduct business under our Code of Business Conduct and Ethics (which we refer to as our “Code of Conduct” or “Code”).

Maple Street Biscuit Company adopted this Code to communicate to you, our team members, how we define proper business conduct and ethical behavior. Please read this Code carefully and refer to it often.

Our Code provides you with general ethical standards for your conduct, but also builds on the policies and procedures we already follow as Maple Street team members. This Code cannot address every situation, but it will guide your judgment. If there is something you are unclear about or if you are not sure what is required of you in a particular situation, please do not guess the answer. Ask for help from one of the many resources listed in the Code.

“You play a critical role in maintaining our culture of compliance and integrity.”

You play a critical role in maintaining our culture of compliance and integrity. Protecting our ethical corporate culture is not only the right thing to do – it is also good business. Guests and business partners judge us by our conduct, as well as by our products and services. We can only achieve our mission to Help People, Serve Other, Be Part of the Community, and Serve Others if we deal with everyone fairly, honestly, and with genuine hospitality and respect.

Thank you for helping us maintain the trust and confidence of our fellow team members, guests, and business partners.

Maple Street Leadership Team

Introduction: Our Core Principles

**Comfort Food with a Modern Twist,
Made Consistently**

Gracious Service

Immaculately Clean

Sustainable Business



Your Code of Conduct:

To satisfy our Mission – Help People, Serve Others, and Be Part of the Community – we must stay true to our Core Principles:

- 1 Comfort Food with a Modern Twist, Made Consistently
- 2 Gracious Service
- 3 Immaculately Clean
- 4 Sustainable Business

These Core Principles also guide the ethical and legal responsibilities of Maple Street's Code of Conduct. This Code of Conduct is adapted from the Code of Business Conduct and Ethics of Cracker Barrel Old Country Store, Inc., which owns our parent company, Agincourt Industries, LLC. For that reason, you will find references within this Code to Cracker Barrel policies that apply equally to Maple Street. There may also be references to Cracker Barrel resources, for instance – the Legal Department – who you may contact with questions or concerns related to this Code.

Our Code presents Maple Street's policies and procedures regarding standards of conduct, built on the trust of our guests and team members. Every team member, leader, and officer of Maple Street (which we refer to as “Maple Street” or the “Company”) are responsible for maintaining that trust. We must practice the highest standards of honesty and integrity when conducting business.

In our roles, each of us is required to:

- Be familiar with and follow this Code, as well as all other Maple Street policies and procedures.
- Follow all applicable federal, state, and local laws and regulations.
- Take responsibility for our own actions relating to proper business conduct and behavior.
- Report any unethical or unlawful activity immediately.

Supervisors, you have an increased responsibility to be sure your team is aware of this Code and help us ensure compliance.

Our suppliers and others who do business with Maple Street must also follow this Code. If you are responsible for retaining or supervising these partners, make sure they are aware of and adhere to this Code in their business with our Company.

Using The Code of Conduct

This Code is a guide to making ethical and sound decisions in your work. It addresses situations you may encounter and directs you to key policies, procedures, and laws that apply to our everyday conduct.

The Code will also tell you who to contact with questions and concerns. Remember, this Code may not cover every situation you encounter. If you are ever unsure what to do or need to discuss a challenging situation, consult your immediate supervisor, The Biscuit ([where you can locate all the policies referenced in this Code within The Biscuit > Team > Employment Guides](#)), [Grace](#), or one of many other Resources listed in this Code.

Reporting Concerns

If you are reporting a situation in which you feel a team member, including yourself, or a guest has been treated differently or harassed based on race, color, religion, ethnicity, national origin, age, gender, disability, or any other legally protected characteristic, please call 1-800-333-9566. Reports regarding accounting irregularity or error or an issue involving an internal accounting control issue, fraud, theft, or an ethics violation or financial wrongdoing may be made directly to any member of the Maple Street Executive Team or Cracker Barrel's Legal Department or through our 24-hour Fraud and Error Hotline at 1-888-894-4262 or www.reportlineweb.com/crackerbarrel. You may choose to remain anonymous when raising a concern.



Enforcement of Our Code

At Maple Street, we do not tolerate illegal or unethical conduct, and will investigate potential Code violations following our internal policies, as described in full in the Team Member Guide ([The Biscuit > Team > Employment Guides](#)) or [Grace](#). Team members who do not follow this Code will face appropriate discipline and corrective action, up to and including termination, reimbursing the Company for any monetary damages, and possible criminal charges.

These may seem like harsh consequences – but yours is a profound responsibility – fulfilling our Mission to Help People, Serve Others, and Be Part of the Community starts and ends with your conduct.

No Retaliation

If you feel you are subject to retaliation, report your concern immediately to the Human Resources Department (who in turn will contact the Cracker Barrel Legal Department) at feedback@maplestreetbiscuits.com. Any team member who retaliates against you for reporting concerns as required by this Code will be subject to appropriate disciplinary action, up to and including, termination.

You can report any known or suspected violation of this Code without fear of retaliation. We protect all team members who in good faith raise concerns and make reports of potential and actual violations of this Code. No team member should be discouraged from using any available channel to raise concerns.

Exceptions and Amendments to Our Code

While many of the policies outlined in this Code of Conduct must be strictly followed, some waivers or exceptions may be possible. Any team member who believes that an exception to any of these policies is appropriate should contact Cracker Barrel's Legal Department for guidance.

Only the General Counsel of Cracker Barrel has the authority to grant waivers or exceptions to the Code to any person other than a director or an executive officer of the Company. The Board of Directors of Cracker Barrel has the authority to grant waivers or exceptions to the Code to directors and executive officers. Certain exceptions may be required to be publicly disclosed by the Company under applicable law.

This Code of Conduct may be amended by action of the Board of Directors or the Nominating and Governance Committee of Cracker Barrel.

Additional Resources

To review any of Maple Street's policies referenced in this Code, log onto The Biscuit at <https://crackerbarrel.sharepoint.com/sites/TheBiscuit> or [Grace](#).

Grace and Biscuit Resources

- Field Team Member Guide: ([The Biscuit > Employment Policies](#)) or [Grace](#).
- 24-Hour Fraud and Error Reporting Hotline: 1-888-894-4262 or www.reportlineweb.com/crackerbarrel
- Human Resources Department: hupdate@maplestreetbiscuit.com
- Media Relations: Refer to Marketing Team at PRandMedia@maplestreetbiscuits.com
- Cracker Barrel General Counsel/Legal Department: (615) 235-4003

Comfort Food with a Modern Twist, Made Consistently



Comfort Food

Anyone can make good food. At Maple Street, we take pride in being a food destination versus being just another option. Each recipe should remind you of home when you take a bite but leave you craving that new spin you can't get anywhere else.

Food and Product Safety

Consistent Comfort Food with a Modern Twist also means preparing each and every one of our menu items with the highest care. We must maintain the trust of our guests and provide a safe, wholesome dining experience through menu items that meet high-quality standards.

Maple Street complies with all food and product safety laws applicable to the Company and its business. You are expected to familiarize yourself with all food safety and other laws and procedures applicable to your assigned duties and comply with all those laws and procedures. Our vendors and suppliers must also follow all food safety and product rules.

If you suspect concerns related to food or product safety or quality, immediately inform your supervisor or the Food & Beverage Innovation Department. See our Team Member Health Policy and Food Handler Certification course for additional information on proper food handling procedures.

For Example

Maple Street receives notification that a product has been recalled. Your supervisor says this product is a top seller and to leave it on the shelves.

What Should You Do?

You should immediately report the concern and conversation to your Mission Coach or Human Resources.

Grace and Biscuit Resources

- Team Member Health Policy



Gracious Service



Gracious Service

At Maple Street, one of our principles, which you will hear us talk about often, is Gracious ServiceSM. When it comes to our guests, we want to do everything to make their experience enjoyable. When guests walk in our doors for their morning cup of coffee, we want it to feel like they are walking into their own home.

Gracious ServiceSM is not just how we treat our guests, but it's how we treat other team members. Graciously serving the people we work with also makes for a more enjoyable and easier workday. We appreciate the help of our team members, and we believe each deserves the utmost respect for helping to live out the mission of Maple Street. We are incredibly firm on this value and will be relentless to keep to it. We believe if you filter everything you do through the question, "Am I showing grace?" you will accomplish our mission.

Workplace Environment

Maple Street is committed to providing an accepting work environment that is free of unlawful discrimination and harassment. This includes discrimination and harassment based on race, color, religion, sex, sexual orientation, gender identity, genetic information, national origin, age, marital status, medical condition, disability, or any other legally protected status. We do not tolerate this conduct in our workplace by team members, supervisors, guests, or suppliers. For additional information, see our Equal Opportunity Policy, Harassment Policy, and Policy Against Retaliation.

Maple Street's policies are intended to result in effective responses to problems. They require you to provide the Company an immediate opportunity to investigate and resolve your workplace concerns. If you feel you have been subject to or have observed discrimination, harassment, or retaliation, contact the Human Resources Department at hupdate@maplestreetbiscuits.com.

For Example

You overhear a co-worker telling an offensive and discriminatory joke, which makes you uncomfortable.

What Should You Do?

Report the conduct immediately to your supervisor (if you feel comfortable doing so) and to the Human Resources Department at feedback@maplestreetbiscuits.com.





Community and Political Involvement

We encourage our team members to graciously serve our communities. Serving and caring for people in the neighborhoods where we do business is important to us, and, we know that it is important to you, too.

To make sure your active community involvement does not conflict with this Code, follow the below guidelines:

- Remember that in any personal, political, or charitable activities, you represent yourself, not the Company. Any opinions expressed must be held out as your own, not those of Maple Street.
- Any outside activities must also be conducted on your own time. Do not engage in solicitation of any kind, including political endorsements or contributions in work areas and during your shift.
- If you have questions about whether your participation in a community, charitable or political activity would result in a potential conflict of interest, contact a member of the Maple Street Executive Team or the Cracker Barrel Legal Department. However, if you are invited to join a board of directors of any publicly-traded organization or company that competes with the Company, you must contact the Cracker Barrel Legal Department before accepting the position.
- Donations are an excellent way to support your community, but you cannot make any direct or indirect political contributions of any kind on behalf of the Company unless authorized by the Cracker Barrel Legal Department. Any charitable contributions made on behalf of the Company must be approved by your department head or a member of the Maple Street Executive Team.

Social Media Communications

Social media engagement gives Maple Street team members the ability to connect with one another and with our guests. While this creates new opportunities for communication and belonging, it also creates new responsibilities.

- Be thoughtful in how you present yourself online.
- Represent your opinions as your own. Do not speak on behalf of the Company if you are not authorized to do so.
- Do not disclose confidential Company information.
- Follow all of our internal policies in your postings, including those prohibiting discrimination and harassment.

For Example

A team member wants to post a statement about a recent Company activity on her social media.

What Should She Do?

Because the post relates to her work, she should state her relationship with the Company (such as her job position) and make it clear that her opinions and comments are her own, not Maple Street's.

Refer to our Social Media Policy for more information on your responsibilities regarding online activity.

Marketing and Advertising

Maple Street provides only truthful, accurate information to our guests and potential guests. We never make false or misleading claims in our marketing or advertising materials. Similarly, we never make false statements about our competitors.

To Help People, Serve Others, and Be Part of the Community, we must be fully committed to providing truthful and accurate information to the public – we expect you to do the same, especially if your job involves marketing or advertising for the Company.

Media Communications

At times you may be approached by the media with a request to participate in a news story on behalf of the Company. The news coverage may be acceptable; however, you must gain approval from Brand Affinity Team before granting permission for the media to interview any team member or film in the store/office. This includes formal requests for interviews, as well as inquiries related to TV/radio, newspapers, magazines, local/national and trade media and internet sites.

If there is a media opportunity you would like to engage in, you must first reach out to the Brand Affinity Team via the number below.

If you are contacted by the media, you should refer them to our Marketing Team at PRandMedia@maplestreetbiscuits.com. For more information, see the Media Policy.

Grace and Biscuit Resources

Policies to Review

- Equal Opportunity Policy
- Harassment Policy
- Policy Against Retaliation
- Social Media Policy
- Media Policy

Immaculately Clean



Immaculately Clean

Our guests deserve to eat in a place that is kept immaculately clean at all times. From the dining room, beverage station, kitchen and walk in cooler- everything should always be kept clean so we can provide a safe environment not only for our guests but for our team members.

Safe Work Environment

We are committed to maintaining a safe and secure workplace for all team members.

You must be familiar with and follow all internal safety and security procedures, including our Safety and Security Policies, which include the Team Member Health Policy, Workplace Safety Policy, and Workplace Security Policy, as well as our Drug & Alcohol Policy. Any unsafe working conditions must be immediately reported to your supervisor.

Grace and Biscuit Resources

- Team Member Health Policy
- Workplace Safety Policy
- Workplace Security Policy
- Drug & Alcohol Policy



Sustainable Business



Sustainable Business

Each of our stores must earn the right to keep their doors open and serve the community. If we don't meet our goals, it can be very difficult to do that. Making sure we are monitoring all aspects of the business is as important as making sure we hand out iced cinnamon biscuits to all of our first-time guests.

Having a business that delivers on its sales and financial goals allows us to deliver on our mission To Help People, To Serve Others, and To Be a Part of the Community. The more the successful the business is, the more communities we can continue to join and serve to bring our mission to life.

Each level of leadership in our stores can help make sure that we are always keeping an eye on things: making sure we are making recipes correctly, scraping all of our pans to get the most product, ringing in orders correctly, ordering the right amount of product and so much more.

Environment and Sustainability

Maple Street, like Cracker Barrel, is committed to driving environmental, social and governance (ESG) issues forward by evaluating and reporting how they impact guests, team members, suppliers, shareholders, and the communities that we serve.

Cracker Barrel has placed corporate social responsibility at the heart of its business, and as a part of that family, you play an essential role in this process. By reviewing Cracker Barrel's Environment, Health and Safety Policy, as well as our Sustainability Position Statement, you are helping to ensure Maple Street, too, complies with all environmental laws and regulations applicable to our business. Our Suppliers must also share our commitment to environmental health and sustainability. See the Cracker Barrel Supplier Code of Conduct for additional details.

Confidential Company Information

Confidential Company information is information developed or acquired by the Company that is not publicly available. This information is critical to Maple Street's competitive success and must be protected from accidental or unauthorized disclosure.

Confidential Company information includes trade secrets and other technical, financial, and business information. For example, confidential information may concern products or services created or being developed by us, recipes, sales data, development plans, customer or market research results, cost data, marketing strategies, financial budgets, and strategic plans.

- Be mindful when discussing confidential information; such information should never be talked about publicly.
- Do not disclose any Maple Street trade secrets or other confidential information outside the Company unless specifically authorized by a corporate officer or required by law.
- Require any business partners to maintain the strict confidence of our confidential information.
- Exercise caution when discarding documents that contain confidential or sensitive information.
- Protect your co-worker's and guest's personal information as you do Company information. Safeguarding personal information is essential to maintaining trust.

If you suspect or know that confidential Company information has been accessed, lost, stolen, or used in an unauthorized manner, report the incident immediately to Cracker Barrel's Legal Department.

Cracker Barrel's ESG Report reflects our responsibility to a broad group of stakeholders. We continue to deliver on our Mission and make progress against our commitments to environmental responsibility, food safety and

quality, providing a great workplace for our employees, and operating under the highest standards of corporate governance and business ethics.



Protecting Company Assets

You have a responsibility to protect Company property, which includes everything from our equipment, facilities, funds, and technology (such as email systems) to our intellectual property and data. As with confidential information, Company property must be used appropriately and only for business purposes, with limited exceptions.

- Company property, including equipment, office supplies, and inventory, must only be used for Company business.
- Damage or loss of Company property must be reported immediately.
- Personal use of Company computers and internet should be limited and cannot interfere with your job responsibilities.
- Conduct Company business only on approved devices and software.
- You are responsible for avoiding the introduction of viruses, from the internet or elsewhere, into the Company's information systems. Do not open or install external or internal software or files without approval from the Cracker Barrel Information Services Department.
- Follow our cybersecurity protocols – protect usernames and passwords, don't open suspicious links, and watch out for Phishing attacks designed to trick you into taking inappropriate action, such as opening malicious files or disclosing confidential information.
- If you leave Maple Street, you must return all Company property, including confidential information, to the Company.

If you suspect or become aware of internal theft or misuse of Company Assets, contact Human Resources Department at feedback@maplestreetbiscuits.com or Cracker Barrel Legal Department.

For Example

You receive an email from the HR Department asking you to open an urgent attachment. However, the email is from a generic “HR Department” address, not from a specific person with whom you normally work.

What Should You Do?

You should use the Phishing Alert tool in your email and report the incident to security@crackerbarrel.com.

Insider Trading

Maple Street’s parent company, Cracker Barrel Old Country Store, Inc., is proud to be a publicly traded company. As part of your work, you may become aware of material, non-public information related to Cracker Barrel. It is your responsibility to treat this information as confidential and follow insider trading laws, which prohibit the misuse of this information for your own benefit or the benefit of others.

Maple Street team members are allowed to invest in shares of Cracker Barrel stock. However, federal securities laws regulate conditions under which certain team members may purchase or sell this stock. Specific limitations are outlined in the Cracker Barrel Insider Trading Policy and Stock Ownership Guidelines for Directors and Officers. Keep in mind, using inside information to trade securities not only violates this Code, but it can have serious criminal consequences. If you have any questions concerning insider trading laws and whether you have non-public, material information or should refrain from trading securities, contact the Cracker Barrel Legal Department.



For Example

You overhear a conversation in which an upcoming earnings release for Cracker Barrel is discussed. The earnings release will disclose Cracker Barrel’s impressive quarter.

What Should You Do?

You should not buy or sell securities when you are in possession of non-public, material information such as unannounced earnings. You could be liable for insider trading. Any actions that you take must occur after the earnings information is publicly available.



Accurate Reporting and Recordkeeping

All team members have a responsibility to keep honest and accurate records. Whether you are an Ambassador reporting daily tips accurately, a Community Leader reporting labor or food numbers, a team member who has travelled completing an expense report, or financial analyst providing data to our auditors, you are responsible for acting with integrity and honesty. You can never create or participate in the creation of any business records that contain false or misleading information.

What is an Inaccurate Report?

- Manipulation or falsification of labor, food or inventory numbers for any reason.
- Misrepresentation of labor accounts by charging other accounts or skills.
- Misuse of team member meals.
- “Playing with the numbers” by moving amounts between time periods, or withholding invoices to affect cash flow or the timing of payment of the invoice.
- Transfers done “on paper only.”
- Using inappropriate food cost and retail inventory procedures.
- Taking unnecessary or unauthorized markdowns, or making unapproved item price changes to liquidate stock.
- Entering bogus refunds or questionable financial report supporting information.

To ensure accurate recordkeeping:

- Make certain your business records (including timesheets, expense reports, invoices, etc.) are complete, accurate, and timely.
- Do not create or participate in the creation of any business records that contain false or misleading information.
- Follow applicable policies and laws as it pertains to record creation, retention, and destruction.
- If you become aware of an attorney demand letter, administrative agency charge, government investigation, or litigation against Maple Street, advise Human Resources Department (who in turn will contact the Cracker Barrel Legal Department) immediately to ensure any necessary litigation hold is timely issued.
- Only enter into contracts or other agreements if you have followed proper protocols and are explicitly authorized to do so.

Please see the Travel and Expense Policy and Cracker Barrel's Document and Email Retention and Destruction Policy for additional guidance.

**For Example**

You are reviewing expense reports and notice that a co-worker is duplicating to obtain higher reimbursement.

What Should You Do?

You should report the fraudulent behavior to your supervisor or the 24-hour Fraud and Error Hotline at 1-888-894-4262 or www.reportlineweb.com/crackerbarrel.

Financial Records and Reporting

If your role involves financial recordkeeping or reporting, you have special responsibilities. Because of Cracker Barrel's status as a publicly traded company, any related filings must be accurate and timely. Depending on your job position, you may be called upon to provide information to assure that public reports are complete, fair and understandable. Similarly, because of your role, you may be called upon to provide accurate financial reporting information related to Maple Street. You must take these responsibilities very seriously and provide prompt and accurate answers to inquiries related to our public disclosure requirements.

Certain financial officers bear a special responsibility for promoting integrity throughout the organization, with responsibilities to stakeholders both inside and outside of Maple Street.

If you suspect fraud or accounting/financial errors, you should report them through the confidential 24-hour Fraud and Error Hotline at 1-888-894-4262 or www.reportlineweb.com/crackerbarrel.

Fair Dealing and Fair Competition

We believe in dealing honestly with our guests, and this means interacting fairly with vendors and competitors, too. Maple Street promotes free and open competition and requires all team members to comply with antitrust and other laws that ensure a fair marketplace.

To ensure that you follow the law and help us promote vigorous compensation:

- Protect the confidential information of our business partners.
- In your business dealings, act ethically and honestly. Do not take unfair advantage of anyone through manipulation, abuse of privileged or confidential information, misrepresentation of a material fact, or any other unfair dealing practice.
- Do not discuss or make agreements on pricing, production, bidding practices, or similar sales information with competitors or among vendors.
- If you possess confidential competitor information, don't share it.
- If you are responsible for a vendor or supplier relationship, hold those business partners to the same standards.

You should be aware that serious legal consequences, including criminal fines and penalties, may apply to anti-competitive conduct. Consult with the Human Resources Department or the Cracker Barrel Legal Department whenever any question arises on the possible application of these laws.

For Example

You are aware that a new Maple Street Team Member, who previously worked at a competing restaurant concept, brought with her certain strategic plans and information from her prior job.

What Should You Do?

You should tell your supervisor immediately. Your supervisor will notify Human Resources Department (who in turn will contact the Cracker Barrel Legal Department) and ensure that Maple Street does not use any information improperly.



Our commitment to ethical business dealings extends to our business partners. Helping People, Serving Others and Being Part of the Community means working with others who share our values. We expect our suppliers to follow all applicable laws and regulations, including those related to food and product safety. We also expect our suppliers to meet our ethical standards regarding human rights and animal welfare.

For additional information on these commitments and expectations, see the Cracker Barrel Supplier Code of Conduct, Animal Welfare Position Statement, and Labor and Human Rights Policy.

Avoiding Conflicts of Interest

As a member of our Family, you must act in the best business interests of Maple Street and make unbiased business decisions on behalf of the Company. This means avoiding conflicts of interest. A conflict of interest may arise when your decision-making or judgment is (or appears to be) influenced by a personal benefit for you or someone in your family.

In your work for Maple Street, you may encounter situations that create or could give the appearance of a conflict of interest. Reviewing and understanding what to do in these situations will help you avoid actual or perceived conflicts.

What is a Conflict of Interest?

- Do you (or a family member) benefit personally from the business decision?
- Would it appear to others that this interest creates a conflict?
- Would I feel obligated to someone or make someone else feel obligated to do something?

- Would someone else question your judgment or objectivity?

If the answer to any of these questions is “Maybe” or “Yes,” it could be a conflict of interest. Disclose the concern to your supervisor or with the Maple Street Human Resources Department (who in turn will contact the Cracker Barrel Legal Department).

Below are common scenarios where a conflict could arise:

Gifts and Entertainment: The exchange and acceptance of gifts and entertainment with business partners occur from time to time. However, you must be careful that such business courtesies are not, and do not appear to be, a conflict of interest. Follow the rules below:

- Only accept or offer gifts that are nominal (insignificant) in value, not difficult to obtain, infrequent, and unsolicited. The value of these gifts should not exceed \$100 per year to any person.
- If you receive a gift that is not nominal in value, you must return the gift and report it to your immediate supervisor. If the gift cannot be returned, the Human Resources Department will use the gift for a legitimate business purpose, such as a prize for a team member event.
- Only accept or offer entertainment if it is local (or does not require significant travel), attended by the host and invitee, infrequent, reasonably priced, and unsolicited. Entertainment gifts must be fully disclosed to your supervisor, preferably in advance of the event.

- Never give or accept a gift that obligates you with respect to a business decision or makes it look like your decision-making was improperly influenced.
- Never give or receive cash or cash equivalent gifts, such as gift cards or discounts. Of note, a discount to a larger group of team members as part of a formal arrangement may be acceptable.
- You may not solicit vendors for gifts, donations or contributions in cash or kind for Maple Street events or activities, unless approved by a Maple Street officer, and part of a specific marketing contract, negotiated sales promotion, or for a Maple Street company event.
- If a business partner offers you a trip, seminar, or lodging benefit, this offering must be fully disclosed and approved in advance by your supervisor. Such gifts must be reasonable in cost and business-related.
- You must personally pay for any meal, entertainment, or other business-related expense that will ultimately be reimbursed by Maple Street. All expense reimbursement should be made in accordance with our Travel and Expense policy.

It may be acceptable for you to provide other business-related gifts and entertainment if approved in advance, job-related, and reasonable. Cracker Barrel's General Counsel has the authority to determine whether business-related gifts and entertainment meet these criteria for all team members, directors, and officers, including executive officers, other than him/herself. Cracker Barrel's Chief Executive Officer has the authority to make such determination in the case of the General Counsel. The exercise of such authority by the General Counsel or the Chief Executive Officer, as the case may be, is within the purview of this Code and does not constitute a waiver.

Contact your supervisor to determine whether a particular gift is appropriate. If you or your supervisor have questions on the appropriate handling of gifts or entertainment, contact Maple Street's Human Resources Department.



For Example

You regularly work with the same vendor. This vendor sends small gifts each month as a thank you for the business.

What Should You Do?

You should tell the vendor that you appreciate the gifts, but cannot accept them. Even if the gifts are small, their combined value over time is significant and accepting these gifts may lead others to believe you are not acting impartially in assigning work to this vendor.

Outside Employment: You should never take on work that interferes with your Maple Street obligations. Similarly, you cannot work for Maple Street while simultaneously performing outside work for the Company as a consultant or independent contractor. Full-time team members are discouraged from working outside of Maple Street – we want you to devote your time and energy to Maple Street. While employed by Maple Street, team members are strictly prohibited from employment with any supplier or competitor of the Company and from requesting any supplier or competitor to hire a relative.

Business Opportunities: Being part of Maple Street means not advancing your personal interests at the Company's expense. Team members are expected to be loyal to the success and sustainability of Maple Street and its team members, guests and business goals. Any business opportunity you discover as part of your job belongs to Maple Street. Do not use your position at Maple Street, or any Company business information or property, for your personal benefit.



Competing Financial Interests: A financial conflict of interest may arise if your judgment is influenced by potential personal financial gain, rather than the gain of Maple Street. To avoid financial conflicts of interests, follow the rules below:

- If your job puts you in the position to influence a Maple Street business relationship, then you cannot hold a financial interest, no matter the size, with or in that business partner.
- You cannot hold a material investment (equal to 5% or more of outstanding shares) in a publicly-traded competitor or business partner.
- You cannot hold a material investment of more than 1% in any privately-owned supplier with which Cracker Barrel and/or Maple Street does business.
- Except for public market investments in publicly-traded companies, any team member with an investment in a business of a Company supplier which exceeds 5% of that team member's net worth must disclose the details of that ownership to the Cracker Barrel Legal Department.
- Except for existing store leases entered into before the date of this Code, you cannot acquire, own, or hold an investment in real property in which the Company has a present or future interest or which affects our business operations.

Business with Friends and Relatives: Transactions with family members and friends may cause conflict. You cannot do material business (or arrange for Maple Street to do business) with friends or relatives without full disclosure to your supervisor and prior written approval from the Human Resources Department and Cracker Barrel Legal Department. Refer to the Fraternalization Policy and Family Member Hiring Policy for additional information on business relationship restrictions.

For Example

Your brother works for a lumber company. In your job, you source lumber for various Maple Street projects. Your brother asks to submit a bid to supply Maple Street with his company's lumber for a new project.

What Should You Do?

You should not hire your brother's company for the project without disclosing the relationship to your supervisor. Your supervisor will notify the Human Resources Department (who in turn will contact the Cracker Barrel Legal Department) to determine what steps need to be taken to remove any conflict of interest.

Relationships with Vendors or Suppliers: We expect our team members to act in the best interest of our Company. Team members should never engage in any relationship or activity with a person, supplier or company that may lead to or give the appearance of improper influence over Company business. The above examples are not intended to be an all-inclusive list of possible conflicts. In addition, there are other situations which, while not clear-cut conflicts of interest, may be inconsistent with the high standards of business ethics that our team members are expected to follow.

Disclosing Conflicts of Interest: The above examples are not intended to be an all-inclusive list of possible conflicts. Also, having a conflict of interest does not necessarily mean you have done something wrong; however, failure to disclose the conflict is a violation of this Code. For example, if a conflict arises because your family member takes a job with one of our suppliers, we can take steps to make sure that the family member is not in a decision-making position with respect to transactions with that supplier. However, those steps cannot be taken unless prompt and complete disclosure has been made.

You must disclose any conflicts of interest or potential conflicts of interest to the Human Resources Department (who in turn will contact the Cracker Barrel Legal Department).

Maple Street fully cooperates with any investigation into its legal compliance. However, the Company should have the opportunity to be adequately represented in such investigations by its own legal counsel. If you believe that a government investigation or inquiry is underway, or receive a subpoena or request for information, immediately notify the Human Resources Department.

In short, don't use your position with the Company for personal advantage or gain.



Anti-Corruption

Corrupt business practices are not tolerated at Maple Street. It is your Responsibility never to solicit, take, or give something of value to influence someone's decision-making as it pertains to Company business. Such action may be viewed as bribery or as accepting a "kickback," i.e., a reward for doing business.

The use of Maple Street funds or assets for any unlawful or unethical purpose, including any political or commercial bribery, is strictly prohibited. Such conduct is not only against this Code, but it may be illegal. The United States Foreign Corrupt Practices Act prohibits Maple Street from giving anything of value (directly or indirectly) to foreign government officials, parties or candidates to obtain or retain business. Maple Street also complies fully with all applicable export and import laws, including those pertaining to economic sanctions, trade embargos, and forced labor in the supply chain (Uyghur Forced Labor Prevention Act).

In short, Maple Street's business is based on hard work and integrity – corruption has no place in our business. Report any concerns to the Fraud and Error Report Hotline at 1-888-894-4262 or www.reportlineweb.com/crackerbarrel or the Human Resources Department at hrupdate@maplestreetbiscuits.com.



Legal Compliance

Unlawful activities place Maple Street at risk. Each of us has a responsibility to obey federal, state, and local laws and regulations applicable to Maple Street's business, including, among others, employment and wage and hour laws, product safety laws, and antitrust and fair competition laws.

While Uyghur Forced Labor Prevention Law must comply with all laws applicable to the Company and its operations, we understand these are wide-ranging and complex. To help you along the way, review the laws and policies that apply to your job responsibilities and complete all of your required training programs. If you ever suspect that a law has been violated, contact our 24-hour Fraud and Error Hotline at 1-888-894-4262 or www.reportlineweb.com/crackerbarrel or the Human Resources Department at feedback@maplestreetbiscuits.com or Cracker Barrel Legal Department.

Grace and Biscuit Resources

Policies to Review

- Travel and Expense Policy
- Fraternalization Policy
- Family Member Hiring Policy
- Cracker Barrel's Environmental, Health, and Safety Policy and Sustainability Position Statement
- Cracker Barrel's Document and Email Retention and Destruction Policy
- Cracker Barrel Supplier Code of Conduct
- Cracker Barrel Animal Welfare Position Statement
- Cracker Barrel Labor and Human Rights Policy

Conclusion

Thank you for reviewing Maple Street's Code of Conduct. We know that you will do what's right, even when it isn't easy, and help us to fulfill our Mission to Help People, Serve Others, and Be Part of the Community!





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