

ODELL BREWING COMPANY CODE OF CONDUCT

VALUES

Our collective leadership and independence empower us to build a culture of ownership where we contribute, educate, and innovate, while keeping Colorado at our core.

Always Better

Our Founders established the Odell culture through a commitment to their mission and vision, including a commitment to remaining independent. The following characteristics define our Evergreen Legacy:

- Purpose - Being passionately driven by a compelling vision and mission.
- Perseverance - Having the ambition and the resilience to overcome obstacles and keep pursuing the mission indefinitely into the future.
- People First - Engaging a workforce of talented associates who excel as a team and are motivated by the mission and the culture, as well as compensation, in the belief that, by taking care of them, they will take care of the business, customers, suppliers, and community.
- Private - Taking advantage of the ability of closely held private companies to have a longer-term view and more operating flexibility than public or exit-oriented businesses.
- Profit - Measuring success by the number that provides the most accurate gauge of customer value delivered.
- Paced Growth - Having the discipline to focus on long-term strategy and grow steadily and consistently each year.
- Pragmatic Innovation - Embracing a continuous-improvement process built around taking calculated risks to innovate creatively within the constraints of the business.

THE ODELL WAY

- We're proud of our craft and our culture.
- We are all stewards of our evergreen legacy.
- We build community through beer.
- We act like owners, because we are.

~Always Better

OUR TEAM

As co-owners, each of us are committed to the success of Odell Brewing Company. We recognize the value of our strengths and the power of a team. We are accountable to one another and connected by our common mission. That means that we jump in to help each other out when necessary and bring our best every day, whether we're in the brewhouse, the tap room, out in the field, or walking the carpeted floors in our office.

EMPLOYMENT OF RELATIVES AND DATING RELATIONSHIPS

We have had a long history of employing relatives of co-workers. There are some cases where we will not consider employing a relative, 1) If the relative will be supervising the current co-worker, 2) If the relative will be reporting to the current co-worker, 3) If the relative and current co-worker will be working in the same department, 4) If there is a potential for a conflict of interest or potential security or financial risk to the brewery.

We recognize that working closely with someone may result in the development of an intimate relationship. If two people develop a relationship and work in the same department, one supervises the other, or there exists a potential conflict of interest, we ask that both co-workers talk with Human Resources. Such relationships can be disruptive to the work environment, especially when power dynamics are at play. Power dynamics, especially in boss/subordinate relationships, can blur the lines of consensuality. Creating the appearance of favoritism can also have a negative impact, a conflict of interest, or the appearance of a conflict of interest. This can lead to potential discrimination or sexual harassment. When these circumstances arise, they will be handled on a case by case basis, with considerations being made to the uniqueness of each situation.

ETHICAL BEHAVIOR

We believe in treating people with respect and holding fast to ethical and fair practices in business. We expect co-workers to avoid situations that might cause their personal interests to conflict with the interests of the Brewery or to compromise its reputation or integrity.

As a co-worker, you should consider how you represent the Brewery in your transactions and interactions. Please do not misrepresent the brewery, its policies, practices, and prices, or misrepresent your status and authority to enter into agreements. Always be respectful of our customers, vendors and competitors.

Odell Brewing Company believes some basic guidelines and procedures are essential for the orderly operation of our business and for the protection and consistent treatment of all co-workers. As a result, we have clearly identified performance expectations so everyone can act in accordance with our workplace standards. Courtesy and common sense should always prevail. The following work rules are not all-inclusive, but serve as a guideline to demonstrate work behaviors considered important to Odell Brewing Company.

1. You are expected to be at work on time, stay until your workday ends, and to do the work assigned or requested of you. If you are unable to be at work on time, you are expected to contact your immediate supervisor promptly.

2. You are expected to regard your workplace with respect and attention.
3. You are expected to act in accordance with all appropriate codes, laws, regulations, and policies, regardless of whether they are set by the Brewery or outside regulatory bodies. Specific safety rules have been established to be in compliance with Occupational Safety and Health Administration (OSHA).
4. You are expected to conduct yourself in a professional manner, exhibiting a high regard for our customers, vendors, business associates, and co-workers. No breach of professional behavior (abusive language, harassment, personal business during work time, etc.) will be condoned.
5. As it relates to social media, ensure your postings are consistent with Odell Brewing Company's ethical behavior guidelines. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to corrective action up to and including termination. Never represent yourself as a spokesperson for Odell Brewing Company. If Odell is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of Odell Brewing Company, fellow associates, members, customers, suppliers or people working on behalf of Odell Brewing Company. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Odell Brewing Company."
6. You are expected to maintain the confidentiality of Brewery information or customer information in your possession (e.g., personal information, trade secrets, financial information, etc.).
7. We pride ourselves on remaining independent with a slow growth model. With that, we must recognize that each co-worker's contributions are significant to our operations. Jumping in and helping each other out, even when it is not part of your role, is expected at every level of the organization.

Examples of Unacceptable Behaviors:

- Belittling, or expressions of bias
- Verbal, physical, or written abuse or assault
- Bullying, intimidation, or victimization
- Discrimination
- Inappropriate use of company property or assets
- Failure to comply with company values
- Illegal activity

- Harassment including:
 - Offensive comments including those related to gender, gender identity and expression, sexual orientation, disability, mental illness, neuro(a)typicality, physical appearance, body size, age, race, or religion.
 - Unwelcome comments regarding a person's lifestyle choices and practices, including those related to food, health, parenting, drugs, and employment.
 - Deliberate misgendering or use of deadnaming (used to intentionally dismiss, deny or reject a person's gender identity).
 - Gratuitous or off-topic sexual images or behavior in spaces where they're not appropriate.
 - Physical contact and simulated physical contact (eg, textual descriptions like “*hug*” or “*backrub*”) without consent or after a request to stop.
 - Threats of violence.
 - Incitement of violence towards any individual, including encouraging a person to commit suicide or to engage in self-harm.
 - Deliberate intimidation.
 - Stalking or following.
 - Harassing photography or recording, including logging online activity for harassment purposes.
 - Unwelcome sexual attention.
 - Pattern of inappropriate social contact, such as requesting/assuming inappropriate levels of intimacy with others.
 - Continued one-on-one communication after requests to cease.
 - Deliberate “outing” of any aspect of a person's identity without their consent except as necessary to protect vulnerable people from intentional abuse.
 - Publication of non-harassing private communication.

You are urged to seek supervisory advice in any doubtful or unclear situation. By everyone doing their best to meet both the spirit and intent of these guidelines, we're hopeful that we can all experience a safe and respectful work environment. As a practical matter, Odell Brewing Company seeks to resolve conduct and performance issues as effectively as possible and corrective action, up to and including termination, may be required to do so.

ANTI-VIOLENCE AND ANTI-BULLYING

Odell Brewing Company intends to provide a safe work environment for all co-workers. Any actions that are determined inappropriate to the workplace, will not be tolerated. Such behaviors may include, but are not limited to, physical and/or verbal intimidating, threatening, or violent conduct, vandalism, sabotage, arson, use of weapons, and bullying. Workplace bullying is repeated mistreatment through verbal abuse, offensive conduct/behaviors and work interference.

Co-workers should immediately report any such occurrences to their supervisor or to the Human Resources Department. When co-workers are found to have engaged in the above conduct, appropriate corrective action up to and including termination may occur. Co-workers should directly contact law enforcement and/or emergency services if they believe there is an imminent threat to the safety and health of themselves or co-workers. If you are a victim of domestic violence, please contact Human Resources for assistance.

PROHIBITED DISCRIMINATION AND HARASSMENT

Odell Brewing Company is committed to providing a work environment that is free of unlawful discrimination and harassment. Actions, words, jokes, or comments based on an individual's race, creed, age (40 or over), religion, color, sex, national origin, ancestry, genetic information, physical or mental disability, military status, sexual orientation, or any other legally-protected category will not be tolerated. As an example, sexual harassment (both overt and subtle) is a form of co-worker misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited.

Harassment because of one's race, creed, age (40 or over), religion, color, sex, national origin, ancestry, genetic information, physical or mental disability, military status, or sexual orientation, or other protected characteristic is defined as:

Verbal or physical conduct that (1) denigrates or shows hostility or aversion toward an individual because of co worker's race, creed, national origin, age over 40, religion, color, sex, ancestry, genetic information, sexual orientation or disability of that of the individual's relative, friends or associates, and (2) has the purpose or effect of creating an offensive work environment, unreasonably interferes with an individual's work performance, or otherwise adversely affects an individual's work performance.

The use of information systems (including e-mail or the Internet) for the display or transmission of sexually explicit images, messages, off-color jokes, or anything that may be construed as harassment or showing disrespect for others, is prohibited.

Co-workers who believe they have been subjected to any form of discriminatory or harassing behavior by anyone, including supervisors, co-workers, customers, clients, or visitors, are encouraged to let the other party know clearly, calmly, and without any doubt, that they object. Co-workers uncomfortable with this approach, or who find that the behavior continues, are urged to bring the matter to the attention of their supervisor, the Human Resources Department, a member of the leadership team, or utilize the Red Flag Reporting tool, so that we may investigate and deal with the problem appropriately. Co-workers can raise concerns and make reports without fear of reprisal. Retaliation in any form, will not be tolerated.

Odell Brewing prohibits retaliation against a co-worker for filing a complaint under this policy or for assisting in a complaint investigation. If you perceive retaliation for

making a complaint or your participation in the investigation, please immediately follow the complaint procedure outlined above. The situation will be investigated.

If Odell Brewing Company determines that a co-worker's behavior is in violation of this policy, corrective action may be taken, up to and including termination of employment.

The brewery will investigate all complaints and will endeavor to handle these matters quickly in a professional manner so as to protect the parties involved. All members of management are responsible for promoting a working environment free of discrimination or harassment. If a supervisor is advised, or becomes aware, of an alleged incident, the supervisor should immediately report it to the Human Resources Department. If the results of an investigation confirm the offense, appropriate corrective action, up to and including termination may occur.

SEXUAL HARASSMENT

Odell Brewing Company strongly opposes sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment. ∂ Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All co-workers are expected to conduct themselves in a professional and businesslike manner at all times. Conduct which may violate this policy includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written form, such as cartoons, posters, calendars, notes, letters, e-mails.
- Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping or questions about another's sex life, or repeated unwanted requests for dates.
- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.

EQUAL EMPLOYMENT OPPORTUNITY/UNLAWFUL HARASSMENT

Odell Brewing Company is dedicated to the principles of equal employment opportunity. We prohibit unlawful discrimination against applicants or co-workers on the basis of age 40 and over, race, sex, color, religion, national origin, disability,

military status, genetic information, or any other status protected by applicable state or local law. This prohibition includes unlawful harassment based on any of these protected classes. Unlawful harassment includes verbal or physical conduct which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. This policy applies to all employees, including managers, supervisors, co-workers, and non-employees such as customers, clients, vendors, consultants, etc.

ADA AND RELIGIOUS ACCOMMODATION

The Company will make reasonable accommodation for qualified individuals with known disabilities unless doing so would result in an undue hardship to the Company or cause a direct threat to health or safety. Odell Brewing Company will make reasonable accommodations for co-workers whose work requirements interfere with a religious belief, unless doing so poses undue hardship on the company. Co-workers needing such accommodation are instructed to contact their supervisor or Human Resources immediately.

COMPLAINT PROCEDURE

Co-workers who believe they have been subjected to any form of discriminatory or harassing behavior by anyone, including supervisors, co-workers, customers, clients, or visitors, are encouraged to let the other party know clearly, calmly, and without any doubt, that they object. Co-workers uncomfortable with this approach, or who find that the behavior continues, are urged to bring the matter to the attention of their supervisor, the Human Resources Department or a member of the leadership team so we may investigate and deal with the problem appropriately. Co workers can raise concerns and make good faith reports without fear of reprisal.

If you believe there has been a violation of the EEO policy or harassment based on the protected classes outlined above, including sexual harassment, please use the following complaint procedure. Odell Brewing Company expects co-workers to make a timely complaint to enable the investigation and corrective action for any behavior that may be in violation of this policy.

Report the incident to the Human Resources Department who will investigate the matter. Your complaint will be kept as confidential as practicable. If you prefer not to go to Human Resources with your complaint, you should report the incident to the CEO.

Odell Brewing Company prohibits retaliation against a co-worker for filing a complaint under this policy or for assisting in a complaint investigation. If you perceive retaliation for making a complaint or your participation in the investigation, please immediately follow the complaint procedure outlined above.

The situation will be investigated.

If the Odell Brewing Company determines that a co-worker's behavior is in violation of this policy, corrective action may be taken, up to and including termination of employment.

Odell Brewing Company will investigate all complaints and will endeavor to handle these matters quickly and in a professional manner so as to protect the parties involved. All members of management are responsible for promoting a working environment free of discrimination or harassment. If a supervisor is advised, or becomes aware, of an alleged incident, the supervisor should immediately report it to the Human Resources Department.

RED FLAG

Odell Brewing Company is committed to protecting its co-workers and to maintain a happy and healthy work environment. If co-workers experience harmful, illegal, or unsafe situations at work, it is important to know that there are several resources with which to make a complaint or file a report. Of course, going directly to a supervisor or to Human Resources is always an option and encouraged. Red Flag Reporting provides another reporting avenue and also allows reporters to remain completely anonymous if they choose.

Red Flag Reporting is an independent company that is dedicated to protecting organizations and their co-workers. This service allows people to report any concerns that may include issues related to harassment, discrimination, safety, and conflicts of interest, etc

If you have questions about Odell Brewing Company's policies regarding these types of matters, we encourage you to review the information in our Co-Worker Guide, found on our HR Google Site:

<https://sites.google.com/odellbrewing.com/humanresources/new-co-workers/obc-co-worker-guide>.

To file a report, provide client code **Odell** and simply do one of the following:

- Visit www.RedFlagReporting.com and click on "File a Report"
- Call 1-877-647-3335
- Text RFR to 234-231-9005
- You may also use the following (be sure to be detail oriented, provide our client code, and indicate if you wish to be anonymous or not):
- Fax to 330-572-8146
- Email to redflag@redflagreporting.com
- Mail to RFR, P.O. Box 4230, Akron, Ohio 44321

We are grateful to have added this constructive aspect to our work environment and while we certainly don't want it abused, we do want you to feel very comfortable using it to report legitimate concerns regarding unethical or unsafe behavior. Please note that this service is not for general HR type questions/issues. You should continue to contact your manager or HR for those types of issues.

If you ever need to file a report, you may use the web, text or phone reporting channels. You will be informed as to whom within our organization the report will be routed to for resolution. Via these methods you will be able to prevent access to any of those people if they are part of the concern. If you do prevent access, that person also will not be notified by Red Flag Reporting that the report was filed. In all instances, someone at our organization will be notified and OBC, not Red Flag Reporting, will be responsible for responding to your concern.

VIOLATIONS OF CODE OF CONDUCT

Depending on the violation of the Code of Conduct, possible consequences include corrective action up to and including termination.

If you are approached as having (consciously or otherwise) acted in a way that might make your teammates feel unwelcome, you are expected to listen with an open mind and avoid becoming defensive. Remember that if someone offers you feedback, it likely took a great deal of courage for them to do so. The best way to respect that courage is to acknowledge your mistake, apologize, and move on — with a renewed commitment to do better.

That said, repeated or severe violations of this code can and will be addressed by our leadership, and can lead to corrective actions up to and including termination.