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The Code of Business Conduct and Ethics of Wendy's Code of Business Conduct and Ethics has been updated and approved by the Board of Directors on February 28, 2017 INTRODUCTION The Wendy's Company, and each of our subsidiaries (named collectively here as Wendy's, The Company, ours, us, us or similar terms) strives for the highest standards of integrity and fair conduct in all of its activities and compliance with both the letter and the spirit of the law. We expect all of our directors and employees to reflect these standards in their day-to-day deals on behalf of the company. This Code of Business Conduct and Ethics (this code) applies to Wendy's and our subsidiaries, including Wendy's International, LLC. This is for all directors and employees of Wendy's, and is a guide to legal and ethical conduct. This Code does not describe all applicable Company laws or policies or provides full information about any individual law or policy. Wendy's has an open door policy that encourages employees to raise any concerns about compliance with this Code, other company policies, and applicable laws. Management and other supervisors are responsible for supporting this policy by keeping the door open for their direct reports and other employees who may contact them. No person will be subject to disciplinary or other retaliation, taking out any concern based on the reasonable belief that the Code, other Company policy or applicable law have been violated. Any such retaliation would be grounds for discipline, in regards to and including dismissal. The Company's Board of Directors has appointed a compliance officer (Compliance Officer) who is fully responsible for overseeing compliance with the Code, other Company policies and applicable laws. Any waiver of this Code must be requested in advance and may be provided only by the Company's Chief Legal Officer; provided that, in the case of the Company's directors and executive officials, any such waivers may be granted only by the Board of Directors and will be promptly disclosed, along with reasons for refusal, to shareholders in accordance with applicable legal and regulatory requirements. Ethics and integrity issues can be complex. We look forward to and welcome questions about the Code and its application to your company responsibilities. The Code cannot address every situation in the workplace. Sometimes the law or policy clearly dictates the result. More often than not, this situation requires interpretation in order to make a just and reasonable decision. When faced with a solution, ask yourself these basic questions about the situation: What feels right or wrong about the situation or action? Does your action comply with the Company's policies and guidelines applicable to law and the Code? How your decision or course of action may affect others customers, suppliers, franchisees, contractors, partners, competitors, community, employees, shareholders, companies? How can your decision or course of action seem different? Innocent acts can lead to offences. Have you fully studied the consequences of your decision? Will additional tips be helpful? Your supervisor knows you and your work and is usually in a better position to help. If you think your supervisor is unable to resolve your issue or problem, please contact your human resources or compliance officer. DIRECTOR RESPONSIBILITY Wendy's expects board members to always set the right tone, mindful of their obligations as fiduciaries and adhere to high standards of conduct, including the policies set out in this Code. Directors should strive to promote these standards in fulfilling their responsibilities to the Company and its shareholders. Directors should adhere to and promote our open-door policy described above. Like our employees, directors must act honestly, in accordance with the law and in the interests of the Company and its shareholders. They should behave professionally and act in good faith and with due care. In overseeing the management of directors, you must be vigorous in their investigations and make an independent judgment to advance the Company's interests. Directors must also maintain confidential information about the Company and disclose any possible conflicts of interest they may have regarding matters dealt with by the Board of Directors or any other aspect of the Company's activities. To this end, directors should be aware of potential conflicts of interest that may arise in connection with the companies in which the directors participate, as well as customers, customers or other parties involved in such enterprises, which may also be directly or indirectly involved in trade or business issues related to the Company. In such situations, directors must make independent judgments and act in accordance with their fiduciary obligations to the Company and its shareholders and do not depend on the business relationships arising from their other business activities. Directors remain responsible for their supervisory and supervisory role at the Board level, with management responsible for the day-to-day operations and management of the Company. Any director who has concerns about compliance with this Code should submit a request to the Chairman of the Board of Directors Audit Committee or Wendy's Director of Legal Affairs. EMPLOYEE RESPONSIBILITY Wendy's believes that its employees are a valuable contribution to a dynamic business whose continued success depends on the legal and ethical conduct of its employees and agents. Thus, every employee has a responsibility to act honestly and honestly, and each employee must take personal responsibility for their conduct and compliance pollician wendy such as this is this The principles reflected in this Code set minimum standards by which workers must lead their professional lives. At its core, it is an unwavering commitment to complying with all applicable laws and respect for your colleagues and others we deal with in our business. While we are actively competing, we must do so within these guidelines. No code of conduct or policy statement can cover all circumstances or anticipate each situation. Therefore, employees facing situations not specifically addressed by the Code or other company policies must apply their general philosophy and concepts to the situation, as well as their personal integrity and the highest ethical standards observed by honorable people. If the issue still exists, staff members should consider specific circumstances with their supervisor, compliance officer or chief legal officer. Compliance officer's contact details are included in Annex A of this Code. Management and other supervisors, including our employees, have a special responsibility to guide in accordance with the standards set out in this Code. They should adhere to and promote our open-door policy and assist employees in understanding the Company's policies as well as its mission and strategy. REPORTING COMPLAINTS If an employee becomes aware of a breach or violation, or otherwise seeks to register a complaint or concern related to that Code, any other company policy or applicable law, he or she must report a violation, violation, complaint or complaint as specifically provided in this code in any of the following ways: File report, is collected [www.ethicspoint.com](http://www.ethicspoint.com) or [www.wendys.ethicspoint.com](http://www.wendys.ethicspoint.com). Call our 24-hour hotline (800-256-8595) 24 hours a day, 7 days a week, 365 days a year. Contact your compliance officer directly. In addition to the foregoing, employees who want to contact Wendy's Board of Directors, Wendy's non-managing directors, as a group or any individual Director of Wendy's with any concerns can do so by emailing [corporate-secretary@wendys.com](mailto:corporate-secretary@wendys.com) or sending their message to the following address: Wendy's Company One Dave Thomas Boulevard, Dublin, Ohio 43017 Attention: Corporate Secretary All Communications Intended for Wendy's Directors will be forwarded to Wendy's Corporate Secretary to the relevant directors on a timely basis without editing or otherwise filtering such messages. The Company's policy is to prohibit unethical or unlawful conduct and to cease such conduct as soon as possible once it is detected. The company will promptly investigate all allegations based on the reasonable belief that this Code, Company policies or applicable laws have been violated. The company will maintain the anonymity of any employee who requests information, as well as the confidentiality of matters related to the report or investigation, investigation, as much as possible in light of the Company's need to investigate reported matters, applicable law and other Company policies. If you're concerned about privacy, you might want to consider posting an anonymous call to our compliance hotline. Officers are also expected to maintain confidentiality of the investigation. Only authorized staff, including the General Counsel, the Chief Financial Officer and the Compliance Officer, will have access to reports or complaints filed in accordance with the methods described above. The Company will take the necessary measures to cease unlawful or unethical conduct and will take appropriate disciplinary action (against those who violate the Code or other company rules (even if such violations are not in violation of the law) or for other reasons as the Company deems appropriate, including taking action against those responsible for failing to reasonably detect or monitor employees in performing their duties in accordance with this Code and other company policies. cooperation in any investigation of the complaint in accordance with the Code or related company policies. The Compliance Officer will report the results of the investigation and the order to the person who has made the report if he or she has left his or her name, to the extent required and in accordance with applicable law. Where the applicable law does not require the person (s) to report it, the Compliance Officer may nevertheless report to that person (s) at the discretion of the Compliance Officer. In all cases, the Compliance Officer will take appropriate measures to ensure (1) prompt and consistent compliance with this Code, (2) a fair process by which violations can be identified, and (3) promptly review of illegal actions and pre-social offenders. Self-reporting. If you ever believe that you may have violated, unintentionally or otherwise, the law or this code in the course of your duties for Wendy, you are strongly encouraged to report such beliefs immediately to the compliance officer. Under many laws, voluntary corrective action by you and Wendy can reduce the adverse legal consequences of a potential violation for both you and Wendy. No retribution. If you report what you suspect of unethical or illegal activity, you should not worry about retaliation from others. Wendy's will not tolerate any reprisal or retaliation against a person who in good faith reports a known or alleged violation of the Company's law or policy, including the Code. Wendy's going to take measures, with respect, including termination, against any staff member or official involved in retribution. BUSINESS RELATIONSHIPS Equal Employment Opportunity is both a policy and a practice in Wendy's. It's at the best of the best to use the skills and abilities of their employees to the full, without taking into account non-performance factors. The specific objectives of Wendy's policy are to comply with all applicable equal employment laws; Understand the concepts of equal employment opportunities for managers, managers and employees; recruit, recruit, train and promote the most qualified individuals on the basis of relevant factors, such as qualifications and quality of work and experience, without taking into account factors not related to our legitimate business, such as race, colour, religion, gender, sexual orientation, gender identity, national origin, age, disability or other group status protected by law; and to ensure that all employment decisions, such as compensation, benefits, transfers, redundancies and re-employment, are made in accordance with those objectives. Any employee concerned about these matters must register his or her concerns in accordance with the procedures set out in the section of this Code entitled Complaints Reporting. If you believe that this policy has been violated by someone with whom you are in contact at work, regardless of whether it is an employee, manager, supplier, supplier, customer or member of the public, you must IMMEDIATELY report the incident to the HR department, a member of the management team, your supervisor, or whoever is in charge in the event that these persons are unavailable. You can also report this to a compliance officer or a compliance hotline. This policy applies to all employment-related decisions, including, but not limited to, employee compensation, benefits, working conditions, opportunities for promotion, training and development, transfer and other employment privileges. Our work environment must be free of harassment. Our employees are our most important asset. We expect all employees to treat their colleagues with respect and to adhere to the highest standards of collegiality. In keeping with these values, Wendy's has long been committed to maintaining a working environment that is free from discrimination, including harassment, based on any legally protected status. Wendy's will not tolerate any form of harassment against any Wendy employee based on his or her protected status by anyone, including other Wendy's employees, franchise employees, suppliers or customers. All employees should avoid any behavior or conduct that may reasonably be construed as harassment; this is particularly the case for our management and other supervisory officers. Behavior prohibited by this policy includes all undesirable conduct, whether verbal, physical or visual, based on the statutory status of a given or persons such as race, colour, religion, gender, sexual orientation, gender identity, national origin, age, disability or other group status protected by law. It includes epithets, insults, negative stereotypes or intimidation acts that based on the protected status of the person, as well as written or graphic material distributed or posted by the Company (including by e-mail), which indicates hostility towards the person because of his or her protected status. Sexual harassment is a problem that deserves special mention. The guidelines issued by the Equal Employment Opportunity Commission define sexual harassment as including unwanted sexual harassment, requests for sexual favours and other verbal or physical sexual conduct, not only when such behaviour is done as a condition of employment, but also where such behaviour creates a frightening, hostile or abusive working environment. Prohibited conduct includes (1) explicit claims of sexual services; (2) sex-oriented verbal jokes, teasing or joking; (3) continued or repeated verbal abuse of a sexual nature; (4) graphic or degrading comments about a person or his or her appearance; (5) displaying sexually suggestive objects or images; (6) subtle pressure for sexual activity; (7) unwanted physical contact such as patting, hugging, pinching or brushing against another body; and (8) discussions about sexual conduct or interests. The fact that employees once had some kind of consensual relationship does not justify and will not justify the harassment behavior that occurs after the relationship ends. Unacceptable sexual harassment can be directed against both men and women and may include accusations of same-sex harassment. If you experience or witness any conduct that may be incompatible with this harassment policy, Wendy's encourages and expects you to register your complaint or care with your department manager, compliance officer and/or other procedures set out in the Section of this Code entitled Complaint Reporting. Please do your best to make sure your concerns are known to management. Under no circumstances, however, are you obligated to report harassment to a supervisor who she believes is responsible for harassment. If the complaint under this harassment policy is found to be worthy of attention, Wendy's will take appropriate disciplinary action against the offender, against and including dismissal from work. After investigating complaints of harassment under this policy, Wendy can impose discipline for inappropriate behavior that comes to his attention, regardless of whether the conduct constitutes a violation of the law or even a violation of that policy. All staff members must cooperate fully in any investigation of the complaint in accordance with this policy. You have to understand that the charges harassment raises serious problems in the workplace and must be done responsibly. Employees who claim harassment in a false or reckless manner may themselves face disciplinary action. Any employee who registers a complaint on the basis of his or her reasonable belief that Wendy's policy against harassment and discrimination has been violated or cooperates in the investigation investigation complaint will be protected from retaliation of any kind. Any such retribution would be grounds for discipline, in regards to and including dismissal. Scenario: Joy and Lawrence are colleagues at Wendy's. A few months ago, Joy ended his romantic relationship with Lawrence. During their relationship, Lawrence often leaves flirtatious notes on Joy's desk and comes to her desk to give her a little kiss from time to time. However, now that the relationship is over, Lawrence continues to leave flirtatious and even sexually suggestive notes on Joy's desk. Joy is uncomfortable with Lawrence's notes to her, but she didn't mention it to Lawrence. Instead, Joy ignores the situation and hopes that it will simply disappear. Instead of the situation going away, Lawrence continues to leave notes for months, and Joy feels extremely uncomfortable. Is Lawrence's behavior sexual harassment? Resolution: Lawrence's behavior can be considered sexual harassment because his achievements are undesirable. If Joy is comfortable, she can contact Lawrence directly, or she should speak immediately with her supervisor, human resources officer, or compliance officer. Once a complaint is made, Wendy can investigate the situation quickly and fairly. Wendy will take the necessary steps to remedy the situation and make every effort to keep the situation as confidential as possible. Be professional. Keep illegal drugs, alcohol and guns away from your workplace. Wendy's prohibits the use, possession, distribution, sale or manufacture of any illegal drug or any alcohol (except as mentioned below) or any unlawful or improper use of prescribed drugs on the Company's property or at work (including in the Company's vehicles) or, except in cases permitted by law, possession of any dangerous weapon or firearm on the Company's property or at work (including in the Company's vehicles). Employees may not be under the influence of drugs or alcohol while on company property or while running a company business. Moderate use of alcohol served at the Company's official events or while in the Company's company held on or outside the Company's property is acceptable if reasonable in the circumstances and provided that the employee complies with the lawful driving rules and other guidelines and laws. An employee who reports his work under the influence or is unfit for work due to the effects of alcohol or drugs is subject to disciplinary action, depending on the requirements of local law. Wendy's reserves the right to search items within the company, including, but not limited to offices, desks, computers, cars and lockers at any time, in full, permitted by the local Use the appropriate language when communicating with other people. The company expects its employees to refrain from using inappropriate expressions when communicating with other people. Inappropriate language includes unwanted, intentional, intentional, uninvited profanity, swearing, swearing mate, and vulgar, offensive, offensive or rude language. Refrain from violence in the workplace. Threats, threats and abusive behaviour, or acts of violence (verbal or physical) against employees, customers or others, or against the Company's property by anyone in the Company's premises or while the company's business is not permitted. FRANCHISEE RELATIONS Each of us must maintain the standards of uncompromising professional integrity in our business dealings with our franchisees. The company expects its employees to understand the need to maintain and strengthen positive relationships with franchisees. To demonstrate our commitment, Wendy's expects its employees to: Treat all franchisees fairly by answering their questions and concerns in a timely and professional manner. Franchisees are our customers and business colleagues; so communication and customer service are critical to our future success. Improve franchise relationships by instilling a culture of leadership and professionalism by creating an environment that encourages the exchange of ideas and collaboration between Wendy's and the franchisee community. The company also expects that all employees who deal with franchisees will comply with the Federal Trade Commission's Rules and Prohibitions of Franchise Disclosure, as well as other applicable laws and regulations. The Company will not tolerate any form of harassment, intimidation or discrimination against our franchisees on the basis of race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability or other group status protected by law. Remember that our franchisees are independent businessmen. They are not our partners in the legal sense and are not employees. We do not make business decisions for our franchisees. Refer to paragraph 19 in the franchise disclosure document (FDD) when asked about potential earnings and encourage potential franchisees to ask other franchisees. DO NOT estimate the potential profit or sale of a new restaurant to any franchisee that is not set out in paragraph 19 FDD. If you have any questions or concerns, contact the legal department immediately. COMPLIANCE WITH WITH LAW Wendy strives to be an honorary company and employer. Employees should always work within the law in all business relationships. It is the Express Policy of the Company that it and its employees comply with all applicable federal, state and local and international laws and regulations of the United States. Employees are personally responsible for reviewing and complying with the laws and regulations related to their work. There are also other laws that are not directly related to the work of the employee, but have a general relationship to situations at work that employees should be aware of. If employees have any questions about what is within the law and what is not, they should seek advice from the legal department. Below are some of the most important laws that apply to Wendy and his and business relationships. Securities laws. These laws prohibit individuals and companies from profiting from material non-disclosure information or internal information that may influence decisions to buy, sell or use specific securities. Such information may relate to a company's financial condition, its products, its securities market, its investment intentions or merger, acquisition or divestment plans. You cannot make securities transactions based on inside information or give such information to others. For more information, you should contact the securities company's policy, which also applies to you. Access to this document can be obtained in the Company's intranet. Antitrust and trade laws. These laws (both in the U.S. and internationally) prohibit actions that deter competition. They are designed to protect the system of free enterprise from corruption or abuse. We, as corporate citizens, have a duty to abide by these laws. Wendy's will actively compete on the merits of our products and services and will not engage in illegal methods of competition. You cannot, for example, cooperate with competitors to fix or stabilize prices, share customers or markets with competitors, boycott competitors or customers, or otherwise interfere with free competition. It is not even necessary to discuss the possibility of such activity with competitors. You may not disclose the nature or content of sealed applications to any vendor or potential supplier. Wendy's may require any vendor selected on the basis of a sealed bidding process to certify that it has not seen or been informed of the nature or content of any other sealed bid submitted. Antitrust and trade laws also prohibit certain types of tie-sale, discriminatory pricing, exclusive transactions and other practices that would be unfair to customers. Bribery, kickbacks and discounts. Bribery in any form, commercial or political, is prohibited in all business dealings of the Company. No Company funds may be used, directly or indirectly, for any bribes, kickbacks or other illegal payments anywhere in the world or under any circumstances. The purchase or sale of goods and services on behalf of the Company should not result in employees or their families receiving personal kickbacks or discounts. Kickbacks and discounts can take many forms and are not limited to direct cash payments or loans in connection with a particular transaction. As a rule, if you or your family receive a personal benefit from the transaction, it is prohibited. Such practices are not only unethical, but in many cases also illegal. NOTE: See Conflicts of Interest below for rules regarding gifts and entertainment. Payments Employees The Foreign Corrupt Act. No payment of company money, gifts, services, entertainment, credits or anything else of value can be offered or provided in any amount, directly or indirectly, to any government official Employee. Such payments or offers are not legal in the United States. The same applies to payments to any other person or corporation, if there is a reason to know that such payment (s) will be used as a bribe, payment, kickback or other improper payment.

The reason to know is very widely interpreted. An example of a reason to know is any excessive or non-routine agent commission that should be carefully considered to make sure that none of them will be misused. Such payments should also not be made in other countries, even if they are legal, if they violate U.S. law, in particular the Foreign Corruptly Corruption Act, regardless of the recipient's nationality. International law. Laws outside the United States may differ from normal U.S. business practices. All of Wendy's practices and actions must comply with local laws as long as they do not violate U.S. law. If in doubt, or in case of conflict, you should contact the Law Department. Immigration Laws. You have to follow all immigration laws and regulations affecting Wendy. Among the various laws and regulations, you are most likely to come across the provisions of the Immigration Reform and Control Act of 1986 (IRCA). The IRCA requires, among other things, that an employer must obtain proper, specified documentation for all employees hired or hired after 6 November 1986. IRCA violations can result in criminal and/or civil penalties. You may violate federal law if you: Don't get proper paperwork for all employees and keep proper records of it; or even if the documentation is provided, you know or have reason to know that the employee is an unauthorized foreigner. You may violate federal law if you do something of the following: You interrogate the person who submits the documentation that seems genuine; You interrogate a person in connection with his or her nationality; You pay a foreigner who does not have an approved work visa; or a foreigner working for you who is paid from abroad without an approved work visa. BUSINESS CONDUCT AND CONTACTS As Wendy's employees, you represent the company. Your interaction with shareholders, franchisees, customers, suppliers, suppliers and all other individuals or organizations should reflect Wendy's values and ethics. In all such contacts, it is important to observe certain standards of conduct. You have to treat every person you encounter with respect and professionalism. Earn franchisees, supplier and customer trust. The company's reputation for honesty is tested every day by how you treat the people you do business with. Honesty, fairness and maintaining commitment should be the hallmarks of how you do business. To present the company truthfully, should increase the company's sense of trust. Whether statements are made through franchisees, customers, shareholders, the analytical community, suppliers, trade groups, the media or made in private conversation, honesty is the best best Public statements must be sufficiently frank, clear and complete so that they are not misleading or misleading. However, material non-participation in public information cannot be disclosed without the approval of the legal department. Wendy's also seeks to fully comply with all requirements applicable to its public disclosure and reporting of Wendy's, including reports filed or furnished to Wendy's securities regulators. All our business communications must be timely, clear and accurate. This is a violation of our policy to misrepresent our financial performance or otherwise jeopardize the integrity of our financial statements or other disclosures. All press releases intended for investors or franchisees of communities must first be reviewed and approved by the legal department. Treat your business colleagues professionally. Act professionally and conscientiously when making business decisions. Personal relationships should never interfere or give the appearance of interference, business action, judgment or decision. When making decisions, weigh all factors impartially and without prejudice and make all decisions based solely on merit. Respect your agreements and do not encourage or interfere with the contracts or agreements of other parties. Communicate clearly and effectively. Think before you speak and write and be proud of what you say and write. Be clear and objective, and write as if your message appears on the front page of The Wall Street Journal or The New York Times. Don't discuss areas that go beyond your knowledge or experience. Maintaining product quality and food safety. Customers deserve the highest quality products and services, in an environment that is clean, attractive and convenient. Our goal is to constantly exceed the expectations of our customers - every day and in every restaurant. Wendy's is constantly monitoring our products and services and working hard to improve them. We all need to help in this process by saying anything that can damage our reputation quality. To make sure that our customers receive safe, healthy food, we must: Maintain strict standards for raw materials that meet or exceed government requirements; Stick to a strict food safety testing program; Follow the tough processing and cooking procedures in every restaurant, every day; Understanding and maintaining proper food processing and personal hygiene procedures; Immediately pull any product that is suspected to be unsafe until a food safety review is completed; and be vigilant: continue to monitor and improve our processes to maintain product safety. Remember: we are all responsible for product quality and food safety. We need to do it now. about any potential problem to our manager or manager. CONFLICTS OF INTEREST Employee Business Solutions should always be in Wendy's best interest. Employees are required to avoid any business, financial or other relationship that may be in the interest of Wendy Wendy to create the appearance of such a conflict. Do your best to avoid situations that could jeopardize independent judgment, but if there is a problem, deal with it frankly and with honor. As an employee of Wendy's, you must immediately notify the legal department and your supervisor of any activity you are engaged in, which may be considered a conflict of interest. They will determine whether there is a conflict and establish controls to prevent abuses or, if such controls are not possible, they may require that you cease your activities or deprive you of interest in any relevant transaction as a condition for continuing your work. Managers who need guidance in this assessment should seek help from the Legal Department. Each year, employees in leadership positions must be prepared, if necessary, to submit an application covering any entertainment, gifts or services that they or their employees have accepted. Any items that were adopted must be reported at the time, regardless of whether they had previously been discussed with any superiors. There are some common relationships or circumstances that may create or create the appearance of a conflict of interest. Situations are usually related to gifts and business or financial transactions or investments. The following areas are intended to clarify the obligations of employees in these circumstances. Gifts, entertainment and other incentives. Adopting such incentives may raise doubts about your ability to make independent business judgments and the Company's commitment to fair treatment of people. Keep in mind that some incentives can be defined as bribes, bribes or kickbacks that are illegal as described above. You can take entertainment such as casual golf going out in your hometown or on-site business meeting and business meals if they are in line with common business practice, cannot be construed as potentially influencing your business judgment or making a commitment on your part, and if public knowledge about them will not embarrass you or the company. When such business activities occur frequently, such expenses must be separated or paid on a reciprocal basis. From time to time, employees may be invited to a meeting or special event (primarily of a social nature), which may include similar offers to a large number of people from the same type of business. If prior permission has been given by the Chief Executive Officer or senior member of the group, such events may be attended. However, by requesting such permission, the employee must document Wendy's advantage in participating in such a special event. The event is held in a very expensive place of the resort, it is unlikely that permission will be granted, because the appearance of illegality may outweigh the advantage of attendance. You can take a rare, nominal nominee valued at less than \$100. Gifts of greater value can be accepted if there is protocol, courtesy or other special circumstances, as is sometimes the case with international transactions; however, all such gifts must be reported to the compliance officer, who will determine whether you can save the gift or must return it or whether it should more appropriately become the company's property. Often, food gifts are given by suppliers during the festive time. If possible, these gifts should be given to your team. You can never accept cash or their equivalents such as gift cards. You cannot personally benefit from any purchase of goods or services for Wendy's or receive any personal benefit from transactions made on behalf of Wendy. Employees should never request gifts from suppliers or suppliers to support the Company's activities or employee incentive programs, except for large meetings such as the Convention or the National Franchise Conference, where the Company believes there is a benefit to participating suppliers and suppliers. Examples of prohibited petitions include items such as door prizes, soft drinks and water, food donations and donations. A request for charitable support can only be made through the Dave Thomas Adoption Foundation. These policies are equally applicable to provision. In addition to the officially approved Wendy's marketing incentive programs conducted in the normal course of business, gift and entertainment for current or potential franchisees, customers or suppliers must be in line with normal business practices. They should be avoided where disclosure would cause negative publicity. You must limit the gift to items of face value and you must receive prior approval from your supervisor. If the cost is reasonable and done infrequently, employees may pay for minor hospitality due to business activities such as occasional food or entertainment. When such business activities occur frequently, such expenses must be separated or paid on a reciprocal basis. Tax law limits the deduction of gifts to employees of non-state customers, prospects or suppliers. Gifts must be separately registered and listed, so the necessary information will be available for inclusion in Wendy's tax returns. Tickets for the event. Employees should never ask for tickets from any supplier, franchisee or business partner. If free tickets are offered to an employee based on a business relationship, these tickets can be accepted but become the property of the Company. An example of this kind of offer would be if a television station in a certain market offered World Series tickets to the company because the company had acquired certain levels of advertising, and the use of tickets will be decided by the Company. Company tickets can be used in conjunction with an employee incentive program offered in a general drawing or among a certain level of employees, or for such other business purposes as a senior team member may be able to Tickets offered only for use by a specific employee are subject to special control and can only be accepted if a senior team member approves the business purpose of the event. Otherwise, these tickets must be declined. Dos and don'ts for gifts and entertainment. The rules of gifts and entertainment are valid all year round, even during holidays, and apply not only to employees, but also to our spouses, partners or family members. If you are offered a gift or entertainment that is inappropriate, you should opt out. If you find yourself in a situation where giving up a gift will embarrass or hurt a person by offering it, you can accept the gift on behalf of Wendy and then report it to your supervisor. One of our vendors offered to take me and my wife to a playoff game for my favorite team. Tickets are priced at \$200 each. Can I accept the gift? A. No. You can't accept a gift for personal use. The \$400 gift exceeds our gift recommendations. You can accept tickets on behalf of the Company and then distribute them in a draw or reward them as an incentive. If this is not acceptable to the vendor, you should politely decline the offer. The contractor invited me to play golf with her. Can I accept the invitation? Answer: Yes. You can attend entertainment features such as this as long as it is a suitable place for business discussion, the cost is reasonable, and the invitation is unsolicited. I am involved in contract negotiations with a specific contractor. The contractor offered to take me to dinner to discuss the business. Can I accept the invitation? A. No. While business dinners are generally acceptable, accepting an invitation to entertainment during business negotiations can give an indication that an event creates mutual obligations and may interfere with your ability to make impartial business decisions. It's important to remember that you can't offer, give or get anything that might jeopardize - or even seem to compromise - the recipient's ability to make fair, impartial and balanced business decisions. Employment offers. Job offers (including post-retirement work) may, in some cases, be an attempt to share your loyalty. If you receive a job offer from a franchisee, customer, supplier, competitor, or even from one of the companies you do business with, the ethical course of action is to free yourself from making decisions that may affect the source of the job offer until you have made a decision. If you accept a job offer, you should immediately stop representing the company with your potential employer. The only exception to this policy is the hourly work of employees in our stores who may work for another company or with franchisees. Scenario: Carlos started his with Wendy two months ago. Prior to working at Wendy's, he worked for SlowMo's Hamburgers, a fast-food chain. Still, SlowMo's Hamburgers Burgers haven't found anyone who's good for Carlos's previous position. SlowMo's Hamburgers asks Carlos to do some contract work in his spare time until a suitable replacement is hired. Carlos is considering a proposal. Carlos thinks he can work for SlowMo's Hamburgers during his free time at home and believes it won't affect his work for Wendy. Can he accept a job offer? Resolution: Carlos cannot accept SlowMo's offer to Hamburgers. Although he may have the best intentions, working as Wendy and a competitor creates a conflict of interest. Working for a competitor harms Carlos' ability to make objective decisions on behalf of Wendy. In addition, hiring outside Of Wendy's for a competitor, supplier or supplier puts Wendy's information at risk. Before you take any external work, you should notify your supervisor to make sure you are making the right decision. Investments and other business interests. A conflict of interest exists when employees have a personal interest in a business or financial enterprise that may be at odds with Wendy's interests. Employees should devote their time, effort and loyalty to Wendy's business. Any employee involvement in any other business must be strictly limited, regardless of whether such a business is in any way relevant to Wendy's business. These conflict-of-interest guidelines apply not only to employees but also to their immediate family members living in their homes. Employees must obtain prior authorization from the legal department before entering into a business transaction that may result in a conflict of interest. Business transactions that benefit family members give the appearance of misconduct. Your family members may have no personal financial interest, accept any payments, enter into contracts or otherwise establish a business relationship with the Company or its franchisees or suppliers, unless it has been approved in advance by the legal department. Immediately report this to your supervisor, compliance officer, or legal director if a member of your family is working, advising the company, or otherwise interested in the company, supplier, or franchisee. While we cannot foresee every situation that may create or be a conflict of interest in financial/investment transactions, below are examples of conflicts: Working, serving as a partner, officer or director, or having significant stakes in a business enterprise that does business with or competes with a company; Buying, renting or selling a property from or in, Wendy's, or near locations is known to be of interest to the company or its franchisees; Accepting payments, services or loans that are not available to the public, or providing advice to individuals or organizations involved dealing with Issues Related to Wendy's or in Competition with the Company; Acting on behalf of or advising, franchisee, competitor, supplier, supplier, In a relationship with Wendy, or similar activities by members of the employee's immediate family; Active commitment to the time responsible for managing any other business that will take time away from your normal work schedule or responsibilities; and taking for yourself the business opportunities that are rightfully owned by the Company. Financial interests do not include ownership of securities in a corporation if all the following conditions are met: securities are traded on the national exchange or through the counter and regularly reported in the financial press; You do not own more than 1/10th of the corporation's outstanding securities; and the market value of the securities you have is no more than 25% of your gross income for the last calendar year. Reciprocity. In many cases, Wendy's buys goods or services from a supplier who also buys goods or services from us. This practice is normal and acceptable, but there is no form of pressure to reciprocity with that supplier. Suppliers cannot be asked to buy our goods or services to become or continue to be our supplier. USE OF COMPANY ASSETS The way the Company protects its assets sends a signal to the public not only about standards of care, but also about honesty. The use of the Company's assets for any illegal purpose is strictly prohibited. Our assets are much larger than our equipment, inventory, corporate funds and materials. They include concepts, business strategies and plans, financial data, intellectual property rights and other information about our business. Each employee is personally responsible for the storage, maintenance and proper and efficient use of Wendy's assets over which he or she has control and must protect these assets from deliberate and unintentional loss or damage. Theft, negligence and profligacy have a direct impact on the Profitability of the Company. The company provides a wide range of assets as resources for its employees in the company's business, such as computers, communications systems and other equipment and materials. We expect all employees to use reasonable judgements and discretion to ensure that the Company's assets are used for legitimate business purposes. Products such as food, facilities, season tickets, equipment and materials should only be used for legitimate commercial purposes or for charitable purposes authorized by the designated management. In addition, Wendy's food, equipment or supplies should not be sold, lent, distributed or otherwise disposed of, regardless of condition or cost, without prior approval from the designated management. Sometimes some of the Company's assets that are no longer needed in business can be sold to employees. These sales must be supported by properly approved documentation signed by the relevant authority, other than making a purchase. Using company computers and other technologies. Computers and electronic information are important tools to support our We all need to ensure that we use technology appropriately. As noted in the Company's Information Security Policy and other personnel policies and procedures, the use of the Company's computers or other technologies to collect or disseminate abusive, sexually suggestive, discriminatory, abusive, offensive, pornographic or other inappropriate data or information is not permitted, whether during or after work. E-mails should be made with the same care that you take in compiling any other Company document. Emails are a solid and recoverable written record and can be easily copied and sent around the world without your knowledge or consent. You must not use the Company's email system to promote personal or political views, send jokes or inappropriate sexually explicit or offensive statements, send unauthorized requests or chain emails, or do business for another organization. The use of profanity, derogatory remarks, discriminatory or offensive comments, insinuations and threatening or offensive language is strictly prohibited. To keep our computer systems and information safe, we must take the necessary steps to protect all passwords and identification codes to prevent unauthorized access. Wendy's reserves the right to block offensive, illegal and non-business sites, and to track and intercept all content of any messages sent or stored in its system, including information that has been deleted by users. You should not expect privacy when using email and the Internet. The company monitors email and Internet access to make sure they are used responsibly and professionally. Control activities, when carried out, will meet any statutory requirements. If you have received any inappropriate communications, you should notify your supervisor, compliance officer, human resources department, or Information Technology Department immediately. CONFIDENTIAL and proprietary information information company information. Confidential information includes information about employees, clients, trade secrets, assets, finances, manufacturing processes, equipment, inventions, projects, suppliers, intellectual property, business plans and strategies, price strategies, marketing data and strategies, sales, timing, costs, distribution, technical expertise, and other information not available. Confidential information also includes programs, processes, data, plans and strategies that you develop while an employee of Wendy's. Confidential information should not be flagged as to be treated as such. This information is usually not known to the public in general or in the industry we are in, and that gives us a competitive advantage. If you have doubts as to whether the information is confidential, consider whether the competitor will have it to your advantage or whether you or another person or company (including the company's shareholders) will benefit from its disclosure. If so, then the information should be treated as confidential and you should contact the legal approval department before disclosing it. It is important to remember that confidential information obtained or obtained during your work is exclusive property of the Company and cannot be disclosed to any other party without prior consent of the Company. It cannot be used to advance the interests of any individual or company, except for Wendy's interests, either during your employment or after you have left the company. Only Wendy's determines who has the right to own or use such data, unless the law requires something else. You must return all sensitive information or documents containing such information to the Company after your departure. Personnel and benefits reports are considered confidential information that cannot be duplicated or removed from Wendy's premises without the prior consent of the Head of Human Resources, compliance officer or executive director of the Company, and in some cases the prior consent of an individual employee. Such information is private and confidential and must be processed in accordance with all applicable laws. Examples of personal data include personal, employment, medical, financial, educational and educational information. Most countries have laws governing the collection and use of personal data, although the types of data covered, the nature of protection and local enforcement mechanisms vary. Wendy's policy is to comply with all such applicable laws. All employees are responsible for complying with data privacy requirements in accordance with such laws and regulations, as well as in accordance with the Company's guidelines and policies. Employees may be required to attend training. Don't discuss sensitive information with people outside of Wendy's, including family members. Don't leave confidential records or documents in places where others can read them. Don't discuss or work with Wendy's data in public places where conversations can be overheard or data compromised. Treat all sensitive information with caution. Mark's written materials are confidential and never discuss sensitive information in public places, including elevators and toilets. Deliberate or unintentional disclosure of confidential information can cause serious harm to Wendy and lead to a lack of business in her business relationship. Discussion and disclosure of such information should be strictly limited to those authorized persons who should be aware of it. Disclosure matters should be referred to the legal department. We respect trade secrets, copyrights, trademarks and patent rights of others. other permitted use under the law, copying such materials may violate the law and the Code. Do not disclose confidential information of the previous employer without the written consent of that employer. If you leave Wendy, you have a constant obligation to protect Wendy's confidential confidential mis accessing other people's confidential information could expose Wendy to potential legal obligations. Misuse of confidential information of the Company may result in the loss of valuable intellectual property rights. Do not ask or disclose information that should remain private. Scenario: Cheryl, a former SlowMo employee at Hamburgers just started working for Wendy.com. Cheryl's first project is to develop a strategy of ways to make delivery methods and stockings more efficient. Cheryl recalls some of the research she did on the subject while working at SlowMo's Hamburgers. Cheryl recalls slowmo's process in Burgers included in their system and is considering using the same solution on Wendy's. Can Cheryl use her former employer's research and strategy to benefit Wendy? Resolution: Cheryl should not use her own research or her previous employer's decision to benefit Wendy. Research by Cheryl's former employer produced and their resulting intellectual property process at SlowMo's Hamburgers. The use of information belonging to a former employer may violate the law and violate the Code. In the same sense, you should not use the proprietary information or know-how that you received from Wendy's to another employer, even after you leave work with Wendy. Franchise, Supplier or Customer Information. The nature of Wendy's business gives many employees access to important business information about franchisees, suppliers and, in some cases, personal customer information. Maintaining their trust requires you to protect the confidentiality of this information. Information about the business of a franchisee or supplier is confidential, as is personal information about customers. Disclosure of information in a company should be only based on the business you need to know. Disclosure to outsiders, except in accordance with legal requirements, is not only incompatible with the Code, but in some cases may be illegal. Computer security. All software and resident data on all computers, whether in production or being tested by the company, are Wendy's sole and exclusive property. Your password must be protected and should not be disclosed to any other person. You must protect any company owned or provided personal computer to ensure that its data, software and equipment are not misused. You must not enter on any company computer any software that is not properly licensed or legally purchased. If you download data from ad boards, network services, or the Internet, you must first scan the data with virus detection software before it enters any network environment of the company. You have to get written approval from the Department of Information Technology before introducing new software into the network. Under no circumstances should you duplicate company-owned or licensed software for use on personal or company-owned hardware without prior authorization from the Department of Information Technology. Technologies, such software can be illegal and lead to fines and fines for the Company and for you. Voice and email and messages generated or received in the office or office systems are not confidential. The Company reserves the right to enter voice and email systems at any time and without notice to monitor, view, copy, print or delete any messages, disclose messages to others, or use them for any purpose. For more information, please contact the Company's Information Security Policy, which can be accessed on the Company's intranet. In addition, the Company reserves the right, at any time and without notice, to monitor the use of the Internet in the office or in office systems. Recording conversations. Without the prior written consent of the Chief Legal Officer or compliance officer, no staff member may eavesdrop or covertly record, record electronically or videotape any conversation, communication, activity or event. This policy applies to any conversation, communication, activity or event that in any way concerns the Company or any of our employees, franchisees, suppliers or customers. From time to time, the Company may record, record, videotape or otherwise monitor conversations or other communications between employees and/or between employees and non-employees for legitimate business purposes, such as customer service training or to protect the integrity of certain business operations. Typically, employees will be notified of when such a recording occurs, in accordance with applicable law. However, under certain circumstances, notification may not be sent, for example, when the Company investigates possible violations of this Code or related policies or in conjunction with regulatory authorities. If you have any questions about this policy, you should contact the legal department. Communication with the press and other external organizations. In addition to the privacy restrictions outlined above, no employee may disclose or in any way share Wendy's sensitive or confidential information to financial or commercial organizations or public or private media. Only the Chief Executive Officer, CFO, General Counsel or Chief Communications Officer can authorize the release of such data. Any questions relating to such information may be referred to the Head of Communications. Any questions relating to this policy should be referred to the legal department. RECORDING AND REPORTING INFORMATION The Company relies on accounting to report to the Board of Directors, Management, Shareholders, government agencies and others. All Company accounting records and reports from these reports must be kept and submitted in accordance with the laws of each applicable jurisdiction. In addition, the reports should accurately and fairly reflect the Company's assets, liabilities, revenues and expenses. All actions and obligations of the obligation in accordance with the Company's authorization policy and written delegations of authority. Correct record and reporting. Wendy's maintains an internal control system that it believes provides a reasonable guarantee that transactions are executed in accordance with management's permission and are properly recorded. The system is characterized by a control-oriented environment. It is expected that all employees will strictly adhere to these policies. Our reports are critical to meeting our financial, legal and business obligations. Therefore, all reports, including employment, wages and financial data, checks and payments, and other important data, should be prepared with precision and caution. Dishonesty or negligence in registering or reporting information, both inside and outside the Company, is not only strictly prohibited, but can also result in civil and criminal liability for you or Wendy. All books and financial statements must be kept in such a way as to fully and accurately reflect, in reasonable detail, all income, expenses, transactions, assets and liabilities in accordance with Wendy's policies and generally accepted accounting principles (GAAP). No false or artificial information can be recorded for any reason. Employees are prohibited from making false or misleading statements in connection with any audit or examination of the Company's financial statements and records, business operations, and compliance with laws or regulations. Each employee is personally responsible for Wendy's funds over which he or she has control. No payment may be made, or an invoice issued on behalf of Wendy with the intention or understanding that any part of such payment or receipt should be used for purposes other than those described in the supporting documents. No secret funds or unaccounted accounts can be saved or created for any purpose. No employee may unreasonably or fraudulently influence, coerce, manipulate or mislead independent or internal auditors regarding the Company's financial statements, accounting practices, disclosures or internal controls or procedures. Company records should be treated as confidential information in accordance with this Code. Immediately report this to your manager, compliance officer, or compliance hotline if you suspect that a fund, asset, entry, transaction, or payment violates this policy. Depending on your responsibilities, you may need to certify your compliance with this particular policy section periodically. If you're a manager - create and maintain the kind of internal controls that may be needed to enforce this policy section. Promote these controls to that the relevant staff understand and comply with them. If you are in doubt for any of the above, consult your manager, legal department, or compliance officer. Loans. Never promise or make any loans or investments of any kind without prior complying with the Company's Authorization Policy and applicable accounting requirements. Accounting. All employees must demonstrate financial integrity in the processing of travel and expense reports and other financial transactions. Cash or other assets should not be retained in any unaccounted for or off-book fund for any purpose. Compliance with GAAP and the Company's internal control system is required at any time. A proper justification is required when alternative accounting treatment is possible in accordance with GAAP. Save records. Removing or destroying Wendy's records and files is not discretionary. Legal and regulatory practice requires the storage of certain records for different periods of time, especially in the tax, tax, security and security, environmental, contract and accounting fields. Furthermore, when a trial or government investigation or audit is pending, the relevant records should not be destroyed until the case is closed. The destruction of records in order to avoid disclosure during the trial may constitute a criminal offense. We have a company record-keeping policy and it must be followed at any time. Any questions regarding the deletion or destruction of Wendy's records or files should be referred to the legal department. COMMUNITY INVOLVEMENT As interested and responsible citizens, Wendy's employees are encouraged to participate in public events. Wendy's will strive: Function as an integral part of the local communities in which she conducts its business operation; and remains well aware of the benefits she and her staff receive from participating in any activity that improves the health, well-being, education and culture of society. As partners with our communities, we have a responsibility to support and participate in the development of social and civic activities in order to improve the quality of our lives. When the Company decides to participate in a community project and use the Company's limited employee time and resources, management will inform affected employees in advance that these efforts are a company-sponsored project. Don't forget to separate your community personal activity from your work. Do public activities in your time, for your own resources and as a private person, not as a representative of Wendy. Do not claim that the Company represents or implies representation to the public or in any public process or forum, unless specifically requested by management. POLITICAL ACTIVITIES AND CONTRIBUTIONS staff are encouraged to participate in the political process and vote for candidates or questions of their choice. Active political participation is the personal choice of each employee and should be conducted in your time in your role as a private citizen, not on behalf of the Company. It is strictly prohibited for individual employees to use Wendy's funds or name, assets or property for political purposes or approval, directly or indirectly. In addition, against the Company's policy to include, directly or indirectly, any any contribution to your account or otherwise that compels the Company to reimburse you for these costs. In general, the cost of tickets for political functions is considered a political contribution. Therefore, including the cost of any such dinner to raise funds in the account, even if the business is actually discussed, against the company's policy, and in some cases illegal. From time to time, Wendy can, within the law and through Wendy's Political Action Committee, support a particular candidate, or support or criticize proposed legislation, rules or regulations that could affect the business environment in which the company operates. Our employees may, although not be required and do not expect, to participate in such activities. The political process has become strictly regulated, and anyone who has any questions about what is or is not correct should consult with the Legal Department before agreeing to do anything that can be construed as Wendy's involvement in any political activity either at the federal, state or local level in the United States or in any other country. SAFETY, HEALTH AND ENVIRONMENT Wendy's is committed to providing a safe and healthy workplace for our employees and visitors to our premises. We are also committed to preventing environmental degradation and minimizing the impact of our activities on land, air and water. These commitments can only be met through the awareness and cooperation of all staff. Each of us is responsible for complying with the Company's safe operating procedures and policies (including the Company's Anti-Smoking Policy), the health of our and our colleagues, and the maintenance and use of pollution control systems. In the United States, regulators exist under federal, state or local jurisdiction to enforce laws and regulations affecting safety, health and environmental protection. The Company's policy is to comply with both the letter and the spirit of the laws and regulations administered by these agencies, and to try to develop cooperation with the inspection and enforcement officers of these institutions. In accordance with this spirit, workers are encouraged to inform their managers of conditions that they consider to be unsafe, unhealthy or hazardous to the environment. Managers are expected to regularly review the incidence of injury/disease in their organization and the effectiveness of their health and safety programmes. These programmes should include provisions for training staff in general and in specific ways as provided by OSHA. Installation of new equipment or modification of existing facilities should include a survey during the planning phase of the health and safety impacts of staff, as well as provisions on minimization and disease. The delegation of responsibility for health and safety activities will take place at each location in accordance with the location's management Managers are encouraged to take as many approaches as appropriate as possible. Goals, results and activities should be communicated to staff to raise awareness of this important aspect of our activities. ANNEX A If the issue still exists, employees should consider specific circumstances with their supervisor or compliance officer. Matching Employee EJ Wunsch Wendy's Company One Dave Thomas Boulevard Dublin, Ohio 43017 E-Mail: Compliance@wendys.com Compliance@wendys.com Wendy's employee handbook. wendy's employee handbook pdf. wendy's employee handbook pdf. wendy's employee handbook pdf.

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