CREW MEMBERS HANDBOOK

updated January 2017

GLDN NUGTS INC. P.O. Box 900 Owasso Ok 74055 918-272-4161

WELCOME TO THE McDONALD'S TEAM

We're glad to have you with us. Whether it's for a part-time job or career, we want you to enjoy working here.

This is your handbook. It has been designed by your McDonald's to make you feel at home in your new job, and to give you some necessary information. Please read it carefully. Reviewing it from time to time will help you make the best of your McDonald's experience.

If, at any time, you have questions concerning the handbook or are puzzled about correct procedures, you are encouraged to discuss them with a member of your restaurants management team.

As you are reading the handbook, you will find many reasons for our success. But no single factor is more important than the dedication and effort of McDonald's employees. Our competitors can copy many of our secrets, but they can't duplicate our pride, our enthusiasm and our dedication for this business. The McDonald's spirit is exclusively ours and yours.

We know you'll find your stay with us a happy and rewarding experience.

WE'RE GLAD TO HAVE YOU WITH US. WELCOME!

Tim and Patty Rich
OWNER-OPERATORS

A FEW WORDS ABOUT OUR CUSTOMERS

Our customers are the lifeblood of our business. Without them, we have no reason to open our doors. Therefore, our goal every minute of every hour that our restaurants are open is to make our customers glad they came to our McDonald's.

Your role in satisfying our customers cannot be overstated. You are critical. A member of your management team will be talking with you more specifically about what you can do to make a very real difference in your restaurant's success.

How do we make our customers glad they visited our McDonald's? It's a combination of things: the food selection and taste; the experience our customers have being served; the cleanliness of the restaurant – at the counter, in the drive-thru, in the

dining room, in the restrooms and in the parking lot. All of these combine to create a good or bad impression with our customers. One thing wrong can prevent customers from returning. Several things done really well can make those customers very loyal to us. As you gain experience working at our McDonald's, you'll probably have ideas about how we could improve our service to our customers. Share your ideas! Our continued success as a restaurant depends on new, fresh thinking, so don't hesitate to speak up.

The bottom line is this: Treat your customers like guests in your own home. Whether you are working the drive-thru, cleaning the dining room or grilling a hamburger, you have many opportunities to delight your customers.

DOING WHATEVER IT TAKES

We have a saying at this McDonald's that sums up our approach to customer service: "Doing whatever it takes." It means that each of us must find the best ways to make our customers happy – especially when they come to us with complaints.

"Doing whatever it takes" can mean different things at McDonald's. During your orientation and first weeks on the job, make sure to talk with your General Manager about how your restaurant is meeting with that commitment and what your role will be to satisfy your customers.

YOUR NEW JOB

As a new employee, you may be a bit nervous; that is fine – it proves you care. When you get on the job, you will probably feel like you have two left hands. You may even think you are the only person in the world with butterflies in their stomach. These jitters are not exclusively yours. Try to remember that the person next to you, doing everything so fast and easily, was in the same boat once. The skill and coordination required to do the job right can be learned. Be patient. If you try to go too fast at first, you can develop bad habits. In a short time, with training and practice, you too can be proficient – **A PRO!**

OUR BENEFITS

Taking care of the people who take care of our customers is one of your management team's top priorities. After all, it makes good business sense to treat our employees as well as we want them to treat our customers. We know that satisfied employees lead to satisfied customers.

In this section, we'll outline seven of the key benefits of working at our McDonald's:

- ¥ Training
- ¥ Career Opportunities
- ¥ Safety
- ¥ Workplace Injuries
- ¥ The Money
- ¥ Performance Reviews and Merit Increases
- ¥ Communication
- ¥ Extras
- ¥ Leave of Absence

TRAINING

Much of this McDonald's success can be attributed to our emphasis on training. We are committed to giving you the latest information about new technology and restaurant procedures to help you serve your customers. Your management team will discuss your training needs and provide you with the instruction you need to be successful.

Learning isn't limited to formal training, however. As we've mentioned earlier in this handbook, employees consciously as well as unconsciously pick up many important job skills at McDonald's. These skills will help you throughout your work life, whether you stay with our McDonald's or continue your career at another company. Here are just a few examples:

- ¥ You'll learn quality control, inventory management, sales building, equipment maintenance, and sound safety procedures.
- ¥ You'll gain experience in interacting with people and troubleshooting.
- ¥ You'll sharpen your teamwork skills.

- ¥ You will be cross trained in a variety of positions so that you gain a broad range of job experiences.
- ¥ You may be given opportunities to develop management skills and to further your career at our McDonald's.

Your experience with our highly recognized and respected franchise will improve your performance and career options in any future job.

CAREER OPPORTUNITIES

A little known fact is that many of McDonald's managers in our restaurants and offices started as crew. And thousands more of today's top executives in companies across the U.S. also had their first work experience and developed valuable career skills in McDonald's restaurants.

If you show a flair for, and an interest in, management and people supervision, you should begin thinking about longer-term career opportunities at McDonald's. A typical career path could look like this:

AND BEYOND
DEPARTMENT MANAGER
SHIFT MANAGER
CREW TRAINER
CREW PERSON

We encourage you to give some thought to your ambitions and career interests and talk them over with your restaurant manager.

SAFETY

Our number one priority is your personal safety while on the job. You can be certain that your management team will do everything possible to ensure that you and your fellow team members are provided with a safe work environment.

To help us continue to provide a safe place to work, we welcome any safety suggestions you have. Bring them to the attention of your management team, so that the unsafe condition may be corrected immediately.

We ask that you do your part in maintaining a safe work environment by working safely, wearing safety equipment when required, observing our safety rules, and keeping our work place neat and clean.

WORK PLACE INJURIES

In the unlikely event you are injured, please immediately report the incident to your manager. We provide protection against job-sustained injuries and loss of work through worker's compensation insurance. This protection is paid entirely by this McDonald's franchise. All medical, hospital and surgical expenses for job-sustained injuries are covered under this policy. You must receive initial treatment by our approved company physician. (GLDN NUGTS INC.)* has been selected to manage the medical care and treatment you may receive in the event you suffer a work related injury. If you seek treatment for work-related injury outside of the USABLE network, the medical costs incurred will not be covered by your employer (unless an emergency).

Your Role:

- ¥ Be familiar with the information on the GLDN NUGTS INC. Posting Notice which has been posted at your work site.
- ¥ If you become injured on the job, please be advised that the GLDN NUGTS INC. has selected the

Company Nurse as the initial contact for treatment.

Call Company Nurse: 1(888)770-0932

If Company Nurse wants you to seek further treatment then you should utilize our company physicians. All restaurants MUST utilize this clinic.

- ¥ If your injury requires emergency care, go directly to the nearest Emergency Room.
- ¥ Our company has an established Early Return to Work Program in which we offer alter-native or modified work duties to a rehabilitating employee in exchange for their early return to work. With a doctor's permission, an offer of part-time or different work duties that an employee can perform during rehabilitation of an injury or illness will be made and will continue until the employee can resume their former job responsibilities. The employee is obligated to accept an offer of modified work duties, otherwise the benefits may cease.

If you have any question on how to access the GLDN NUGTS INC. program you may call our offices at 918-272-4161 which will connect you with our representative fully knowledgeable of the GLDN NUGTS INC..

Your Rights, Responsibilities and Obligations

- ¥ Keep your supervisor informed of your injury.
- ¥ To receive all care for work-related injuries through the GLDN NUGTS INC. program and to follow the treatment plan prescribed by your primary treating provider.
- ¥ Emergency care does not need pre-certification.
- You are to notify your supervisor immediately if any provider(s) submits "balance bills" directly to you for payment. Balance billing is the excess amount for medical service charges that the insurance carrier disputes and refuses payment to the provider. Any provider who submits a bill to you for payment of the excess amount is considered to have "balance billed".

THE MONEY

You will be paid every two weeks. The payroll closes every other Tuesday. Employees cannot be paid before the normal payroll cycle. Checks will be available for Pickup the Tuesday after Payroll ends. If the restaurant is busy checks will be handed out as soon as customers are waited on.

As a crew member, your starting wage will be at or above the prevailing minimum wage of \$7.25 per hour.

PERFORMANCE REVIEWS AND MERIT INCREASES

McDonald's is a Pay for Performance Company!

This means that the better you do your job, the more money you can make!

Your Management Team will formally review your job performance twice each year. Reviews are based on hire date or promotion date. This is your chance to see how well you are doing and how you can improve. Based on your performance level, you will be considered for a pay increase. The better your performance, the better your pay increase.

then your raise is:	hourly rate of:
.25	\$9.00
.15	\$8.50
.10	\$8.00
- 0 -	\$7.50
	.15 .10

Upon reaching the maximum hourly rate an employee is eligible for one-half the standard merit increase. This will occur once annually. You will, however, continue to receive 2 performance reviews a year. If your performance improves or you are promoted to a position with a higher maximum rate you will return to 2 wage reviews a year.

The positions of Crew Trainer, Shift Manager, and Maintenance Person have a higher starting rate and higher maximum rate. If you are interested in applying for one of these positions, talk with a member of your Restaurant Management Team or Supervisor for information.

Ways to earn pay rate increase:

- ¥ Verifications of foundations thru FRED, one crew station and review within 30 days
- ¥ Crew trainer must be verified on FRED and training book
- ¥ Promotion to shift manager
- ¥ Become a maintenance person

COMMUNICATION

Satisfying the needs of our employees and customers requires frequent communication. Your managers will be communicating with you in several ways. They will also be asking for your input on how to make things better. Here are some of the communication tools we use in this restaurant:

- ¥ Focus Groups (Rap Sessions): These are small, informal group discussions of ideas, suggestions and problems. They are held as needed and may be initiated by management or by a crew person such as yourself.
- ¥ Crew Meeting: These formal meetings are held to discuss policies, upcoming events and sales promotions, or special situations. As with Focus Groups, you will be paid to attend these meetings. We make an extra effort to make sure these meetings are fun and productive for you.
- ¥ **Opinion Surveys:** Our employees' opinions about our restaurant operations are very important to us. So from time to time, management may ask that you participate in an opinion survey. Your responses are always anonymous so that we can assure you of complete confidentiality.

We use the results of the surveys to see how we're doing and give us an idea of where we need to make improvements.

¥ Your Own Ideas: As you work, you may find a method that saves time and energy, or you

may have some constructive criticism to offer. We welcome your input. In fact, many of our crew person's suggestions have been adopted at this McDonald's. Please feel free to share your thoughts with your management team.

¥ **Open Door:** At our McDonald's, we value the results we have gained by keeping the door open for communication from any employee. If you feel you are not getting your message or ideas across, or if you have a problem you cannot resolve, contact your manager.

EXTRAS

- **¥Meal Discount:** Strict adherence to the meal policy guidelines is imperative. Any violations will result in termination. Meals based on the following guidelines:
 - 1. Employees are entitled to one Free meal discount during your shift. (Crew Trainer, Shift manager, and Maintenance Person are allowed two free meals.)
 - 2. Crew allowed one meal per shift
 - 3. All meals must be rung up on the front counter register and print and sign receipt. Receipt is filed in the Managers Office. Failure to do so will result in the manager's forfeiture of meal program.
 - 4. Meals must be consumed on the premises.
 - 5. Meal value is equal to a value meal or a maximum of \$7.00 before the discount.
 - 6. Meals must be rung up by a manager on a FC register.
- ¥ **Crew Room:** We have provided a crew room in your restaurant to allow you a place to relax during your break. We have tried to make this room as comfortable as possible for you. Make every effort to maintain it.
- **Breaks:** We try to provide one 30 minute unpaid break when working at managers discretion. We do not allow any additional breaks (i.e. cigarette breaks).
- ¥ Regular Crew Activities: Each restaurant holds occasional crew activities such as Summer Crew and a Christmas Party. These activities are FREE and everyone is encouraged to participate.
- ¥ Crew Referral: The best source of new crew members comes from referrals from existing employees. We will pay a \$50 referral bonus to any existing employee who refers a new crew member to our company. The new employee must:
- (1) Notify the manager of the referral at the time of hire,
- (2) They must work for 90 days, and
- (3) have a satisfactory work record before the bonus is paid.
- ¥**Priority Reference:** If you are planning to relocate, a priority reference certifies you as a McDonald's crew member to other participating McDonald's restaurants. To

receive a priority reference, you must be rated good or better and leave your McDonald's restaurant in good standing. So, if your family is moving or you're leaving for school, see your manager about priority reference.

¥ National Employee Scholarship Program: The McDonald's National Employee Scholarship Program is one of many examples of McDonald's commitment to employee development and recognition. For additional information on how you can apply for a McDonald's Employee scholarship and for eligibility information, please visit StationM, McDonald's crew web site.

In addition Shift Managers in good standing may apply for a GLDN NUGTS, Inc. scholarship. Please see the General Manager for details.

- PerkSpot: McDonald's is excited to offer you PerkSpot, a one-stop-shop for
 exclusive discounts at many of your favorite national and local merchants!
 PerkSpot is completely free, and optimized for use on any device: desktops,
 tablets, and phones. Enjoy access to thousands of discounts in dozens of
 categories, updated daily.
- McResouce Line: McResource Line is a low-cost, bilingual referral resource for employees and their families to help with work & life issues including child-care, transportation, grief, elder-care, education and much more.

LEAVE OF ABSENCE

This company adheres to the Family and Medical Leave Act of 1993 (Revised January 2009) and the Family and Medical Leave Act Military Family Leave Entitlements (January 2009).

In addition, if you find that you must temporarily leave active employment at McDonald's because of obligations of school, travel, pregnancy, or any other reason, you may request to be placed on a leave of absence. With management approval, this will permit

you to continue as an employee with McDonald's for periods up to 12 months. Upon returning, every consideration will be given to afford you with the same status and position you had when you went on leave of absence.

Basic Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, jobprotected leave to eligible employees for the following reasons:

¥ For incapacity due to pregnancy, prenatal medical care or child birth;

- ¥ To care for the employee's child after birth, or placement for adoption or foster care;
- ¥ To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
- ¥ For a serious health condition that makes the employee unable to perform the employee's job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

Benefits and Protections

During FMLA leave, the employer must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

Eligibility Requirements

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by the employer within 75 miles.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Use of Leave

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Substitution of Paid Leave or Unpaid Leave

Employees may choose or employers may require use of accrued paid leave while taking FMLA leave. In order to use paid leave for FMLA leave, employees must comply with the employer's normal paid leave policies.

Employee Responsibilities

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal callin procedures.

Employees must provide sufficient information for the employer to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the employer if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

Covered employers must inform employees requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for the ineligibility.

Covered employers must inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA- protected, the employer must notify the employee.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

- ¥ Interfere with, restrain, or deny the exercise of any right provided under FMLA;
- ¥ Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement: An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement which provides greater family or medical leave rights.

OUR EXPECTATIONS

This section of your handbook explains our expectations of you. Much of the information is provided to ensure your safety and that of your fellow employees and customers. There are six areas:

- ¥ Basic Responsibilities
- ¥ Neatness Counts
- ¥ Business Guidelines
- ¥ Rules of Conduct
- ¥ Zero Tolerance Policy
- ¥ Drug and Alcohol Policy
- ¥ Social Media Policy
- ¥ Seat Belt Policy
- ¥ Distracted Driving Policy

BASIC RESPONSIBILITIES

Your most basic responsibility is taking care of the customer – but there are some other things we are going to ask you to do:

- ¥ Emergency Information: In order to keep our records up to date, always notify your management team when you change your name, address, telephone number, emergency contact or availability.
- ¥ Reporting Accidents: Immediately alert a member of the management team if you spot an illness, accident or unsafe working conditions in the restaurant. Likewise, if you're injured on the job, report it immediately.
- ¥ What To Do If You Are ill: Do not work if you have, or are a carrier of, an illness that will affect your fellow employees or our customers. If you think you have − or have been exposed to − an infectious disease, please call a member of your management team to ask for time off and call your doctor. However, please call a minimum of 2 hours advance notice as soon as you know you will not be able to work. A doctor's note indicating you are healthy will be required in order to return to work
- ¥ **Terminating Your Employment:** Quitting without notice is a discourtesy to our management, our crew, and our customers. We do not feel that those who do so merit the same level of compensation we award those of you who are in our restaurants taking care of our customers.

NEATNESS COUNTS/PERSONAL APPEARANCE

It is McDonald's policy to stress the highest standards possible in all phases of its operations, including standards regarding cleanliness and neatness. The following guidelines

have been developed and are published to assist the employee in meeting these standards:

- ¥ All employees are required to maintain the highest standards relating to personal hygiene, including regular bathing and use of deodorant, clean hands and fingernails, and the moderate use of cosmetics for women. Male employees are not allowed to wear any type of cosmetics such as facial make-up.
- ¥ The use of tobacco products, E-cigarettes and chewing gum is prohibited while working.
- ¥ Jewelry is permissible when worn in good taste and limited in size and amount. Facial rings are not permitted on any employee. Studs and Gauges must be flesh tone or clear. No more than 1 inch in diameter

Necklaces or bracelets are not permitted on any employee.

- ¥ It is recommended that all employees style their hair so that it does not exceed moderate length or height (does not exceed the bottom of the ear, or overlap the collar, or is styled not to exceed a reasonable height from the scalp).
- ¥ A clean shaven appearance is required.
- ¥ Sideburns are permissible; however, they will be styled not to extend below the earlobe and will be groomed to avoid being overgrown. Mustaches must be Neatly trimmed to the corner of the mouth. Beards are acceptable if they are well groomed and no longer than one inch.
- ¥ All employees shall be required to wear a clean, neat authorized McDonald's uniform while working.
- ¥ Shoes must be clean and neat and non-slip Tennis or athletic shoes should not be worn
- ¥ Sweatbands or other such items are not permissible. In general, tattoos and body markings, such as hickeys, should not be visible to our customers

Employees who have questions or difficulty in meeting these standards are encouraged to discuss their questions with their supervisors.

Uniform and Shoe Program: When you are on the job, you must always wear the complete approved McDonald's uniform. The uniform consists of a McDonald's issued shirt, Jeans (**plain dark or McDonald's Branded Jeans, belt, hat, name tag and apron**). If you are not in complete uniform you are not entitled to a meal discount for that shift. (This is based on managers approval).

McDonald's will furnish applicable uniforms without cost to you. If your uniform is no longer presentable due to age or normal wear, please let your People Manager know. Uniforms are replaced when needed as the People Manager and General Manager are in agreement.

All employees will be issued two uniforms during their orientation. This will allow you to have a clean and neat uniform every time you work. Uniforms should not be left at the restaurant.

GLDN NUGTS, Inc. has a tremendous optional safety shoe program with Shoes for Crews. These non-slip shoes dramatically improve the safety of employees. Employees are encouraged to order these through their restaurant manager. GLDN NUGTS, Inc. will contribute \$20.00 for any pair of shoes which are ordered during the employee's orientation.

** Employees needing replacement shoes should contact the People Manager who will discuss options for replacement.**

BUSINESS GUIDELINES

Following is an explanation of our standard business practices at this restaurant. We ask that you use your good judgment in all situations.

- ¥ Park only in areas designated by your management.
- ¥ Do not use tobacco or chew gum while working.
- ¥ Please request permission before using the restaurant telephone to make personal calls.
- ¥ Review the crew bulletin board regularly for information; request permission before posting any notices.
- ¥ Do not bring valuable personal belongings or large amounts of cash to work.
- ¥ Always ask permission from a manager before going behind the counter out of uniform. Do not request to receive your paycheck early or to have a personal check cashed.
- ¥ Dating a fellow crew employee is acceptable as long as it doesn't interfere with our restaurant operations. However, dating superiors is not permitted.
- ¥ Ask your management team to explain any work policies or procedures which you do not fully understand.
- ¥ Time clocks have been installed in each restaurant to assure an accurate record of your work time for pay purposes. You are expected to be in complete uniform and clock-in on time. Also, you are expected to clock- out as you leave the floor at the end of your **scheduled** time. You will be paid for all hours required at the restaurant, including training sessions, crew meetings, etc. Please be sure to follow the proper time clock procedure as your time is correctly recorded for each pay period.
- ¥ Do not allow anyone to access your employee # for the purpose of clocking you in or out
- ¥ Your restaurant operates seven days a week, twelve months out of the year. Normally, the restaurant is only closed Christmas and Thanksgiving to allow everyone to spend time with their families. You may request time off to observe religious holidays.
- ¥ It is the responsibility of every employee to insure the security of fellow employees and the restaurant. Please follow all security procedures (i.e. staggered method) exactly as specified by management. If you have any questions, please ask a member of the management team.

CASH POLICY

- 1) The possibility of shortages in our cash register does exist. Our cash register policy will be strictly enforced: If a cash drawer is more than \$2.00 over or short; if promo is more than \$2.00 short (not substantiated by coupons); or T-Reds exceeds an average of \$1.99 in a 60 day period:
 - 1) First Incident the employee will receive a written warning.
 - 2) Second Incident the employee will be suspended for one week without pay.
 - 3) Third Incident the employee will be terminated.
- 2) We do not accept any checks-personal, employee payroll, travelers, etc.
- 3) All bill \$100 and above must be accepted by a manager only.
- 4) All bills \$20 and above must be marked with a counterfeit pen.
- 5) Credit card charges above \$25 requires customer to sign receipt.
- 6) You are the only crew person allowed to work on your register.

RULES OF CONDUCT

As in any organization, we must specify rules of conduct for the safety and well-being of our employees, customers and community.

Some – but not all – examples of misconduct include:

- ¥ Falsifying Records: Examples include application forms, information regarding your employment, time card records, and claims of injury.
- ¥ **Harming Others:** Deliberately assaulting or injuring any employee or customer or attempting to do so.
- ¥ **Obscenity:** Using profane, obscene, vile or abusive language with employees or customers.
- ¥ Stealing: Misappropriation of cash, cash equivalents, raw products, materials that are confidential, and properties such as parts or tools. This includes giving away or under charging for food and beverage products and consuming food which was not purchased or given to you by the restaurant management.
- ¥ **Felonies:** Any activity classified as a felony or misdemeanor.
- ¥ **Neglect:** Carelessness which results in the loss, damage or destruction of restaurant, employee or customer property.

- ¥ **Absenteeism*:** Leaving the job without permission, habitual lateness, absences, or conducting personal business without permission while on the job. Violations in a 60 day period will result in:
 - 1) First Incident the employee will receive a written warning.
 - 2) Second Incident the employee could be suspended for one week without pay.
 - 3) Third Incident the employee could be terminated.
- ¥Illness*: We realize that people get sick from time to time and it may be necessary for them to miss work. You must provide sufficient proof of the need to miss work, such as a doctor's excuse. After 3 days of consecutive absences due to illness a doctor's note must be received to be able to return back to work.
- * A 2 hour notice is required to allow the restaurant time to cover the shift. Employees on overnight shifts need to call by 5 PM.
- ¥ Confidential Information: Disclosing to any person, including television, radio and print media representatives, any confidential information relating to this McDonald's franchise, its business, customers, finances or trade secrets.
- ¥ Solicitation: Solicitation of employees who are on working time, by outsiders, for funds, memberships, individual commitment to outside organizations, or distribution of literature or any purpose is prohibited.

Solicitation by employees for funds, membership, individual commitment to outside organizations, or causes is also prohibited on restaurant premises during such employee's working time, or even when not on working time, if such solicitation takes place in an area of the restaurant frequented by customers or otherwise interferes with work being performed by other employees.

Distribution of literature is prohibited in customer selling areas, or employee working areas during working time. Restaurant premises must be kept clean and free of litter at all times.

Employees who have finished work are requested to leave the premises as soon as possible. Off duty employees are not permitted to distribute literature, to solicit, or otherwise interfere with or disturb working employees. Off duty employees must request manager's permission before going behind front counter.

¥ Loitering: Do not loiter on McDonald's property at any time.

ZERO TOLERANCE POLICY REGARDING DISCRIMINATION AND SEXUAL HARASSMENT, AND CHILD LABOR LAW COMPLIANCE FOR EMPLOYEES OF THIS INDEPENDENT MCDONALD'S FRANCHISEE

This Independent McDonald's Franchisee has zero tolerance for unlawful discrimination, including harassment and sexual harassment. Employees who violate this policy will be disciplined up to and including termination.

This Independent McDonald's Franchisee Prohibits Discrimination. This Independent McDonald's Franchisee strongly believes that employees and applicants for employment should be treated fairly and without regard to race, color, sex, religion, national origin, age, disability, veteran status or any other prohibited basis. This applies to all employment practices, including recruiting, hiring, pay, performance reviews, training and development, promotions and other terms and conditions of employment. Discrimination or harassment of an employee of this Independent McDonald's Franchisee, whether by another employee, supplier, vendor, consultant or customer will not be tolerated.

This Independent McDonald's Franchisee Prohibits Harassment. This Independent McDonald's Franchisee will not tolerate any form of harassment, joking remarks or other abusive conduct (including verbal, non-verbal, or physical conduct) that demeans or shows hostility toward an individual because of his/her race, color, sex, religion, national origin, age, disability, veteran status or other prohibited basis and that creates an intimidating, hostile or offensive work environment, unreasonably interferes with an individual's work performance or otherwise adversely affects an individual's employment opportunities.

This Independent McDonald's Franchisee Prohibits Sexual Harassment. This Independent McDonald's Franchisee has zero tolerance for any form of sexual harassment of any employee, whether male or female. Sexual harassment is prohibited because it may be intimidating, an abuse of power, and is inconsistent with the policies, practices and management philosophy of this Independent McDonald's Franchisee. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and certain other verbal, non-verbal or physical conduct which is sexual or based on gender if that conduct could reasonably offend another person, whether or not such conduct was intended to offend.

Examples of sexual harassment can include the following:

¥ Verbal harassment, including jokes, comments or threats relating to sexual activity, body parts, or other matters of a sexual nature.

- ¥ Non-verbal harassment, including staring at a person's body in a sexually suggestive manner, sexually related gestures or motions and/or circulating sexually suggestive material.
- ¥ Physical conduct, including grabbing, holding, kissing, tickling, massaging, displaying body parts, unnecessary touching or other unwelcome physical conduct.
- ¥ An employment decision (including promotion, demotion, compensation, scheduling) made by a supervisor based on the employee's submission to or rejection of sexual conduct.
- ¥ Submission to sexual conduct as an implicit or explicit condition of getting or keeping a job.
- ¥ Conduct that denigrates or shows hostility or aversion to a person because of his/her gender and creates an intimidating, hostile or offensive work environment.
- ¥ Any other sexual conduct that unreasonably interferes with another person's work performance or creates an intimidating, hostile or offensive work environment or adversely affects another person's employment opportunities.

Sexual Offense Policy

To continue to protect its customers and employees and, in particular, its customers and employees who are minors, it is McDonald's policy:

- (1) To refuse to hire any applicant for employment and
- (2) To no longer employ any current employee who has been convicted of or pled guilty to any criminal sexual offense. This policy is subject to the limitations of applicable law.

Application of the Zero Tolerance Policy All employees are required to adhere to this Independent McDonald's Franchisee's policy prohibiting discrimination and harassment while on this Franchise's premises, engaging in work related activities, company-sponsored training or other functions, and at non-company activities when conduct at these activities would affect the work environment.

Employee Recourse Every employee has the right, and is encouraged to tell any employee of this Independent McDonald's Franchisee in a professional manner to stop behavior towards him/her that the employee believes to be discriminatory, harassing and/ or offensive. Any employee who feels subjected to discrimination or harassment should immediately report it to the Human Resources representative for their Independent McDonald's Franchisee. As an alternative to Human Resources, employees may report their complaint to the Director of Operations. This Independent McDonald's Franchisee will investigate any report thoroughly, with sensitivity towards confidentiality. If the report has merit, this Independent McDonald's Franchisee will take corrective action, including, but not limited to, disciplinary action against the offender ranging from a warning to termination.

Management's Responsibility It is the responsibility of every employee to prevent discrimination and harassment. Management employees who witness or receive reports of discriminatory or harassing behavior are required to take appropriate action, including immediately reporting such behavior to the Human Resources representative for this Independent McDonald's Franchisee or directly to the Owner/Operator. Management employees who fail to promptly report such behavior may be subject to discipline.

This Independent McDonald's Franchisee Prohibits Retaliation This Independent McDonald's Franchisee encourages employees to report incidents of discrimination or harassment without fear of reprisal. This Independent McDonald's Franchisee prohibits retaliation against any employee who has made a complaint about harassment or discrimination or has cooperated in the investigation of such a complaint. Retaliation includes any employment decision or other conduct made with the intent to punish an employee for complaining about or assisting in the investigation of discrimination or harassment.

Zero Tolerance Policy of this Independent McDonald's Franchisee Regarding Treatment of Customers, Suppliers and Vendors The employees of this Independent McDonald's Franchisee are prohibited from discriminating against or harassing customers, suppliers and vendors based on race, color, sex, religion, national origin, age, disability or any other unlawful reason, both in the course of work-related activities and at company-sponsored training or functions. Management employees who witness or receive reports of discriminatory or harassing behavior are required to take appropriate action, including immediately reporting such behavior to the Human Resources representative for this Independent McDonald's Franchisee or directly to the Owner/ Operator. Violating this policy will lead to disciplinary action up to and including discharge.

This policy creates no contractual rights on the part of any person.

Zero Tolerance Policy of this Independent McDonald's Franchisee Regarding Child Labor Law Compliance This Independent McDonald's Franchisee has Zero Tolerance for Child Labor Law violations. This Independent McDonald's Franchisee prohibits the employment of any minor at any time or in any manner which is contrary to or prohibited by any state or federal law. Strict compliance with all applicable child labor laws is required by law and is an essential element of our business standards. It is the duty and responsibility of all restaurant management, including swing or shift managers and floor supervisors, as well as any staff employees who supervise, train, manage, direct or consult with restaurant operations, to ensure compliance with all state and federal child labor laws and the Child Labor rules of this Independent McDonald's Franchisee. These policies are posted in the restaurant. Employees who violate this policy will be disciplined up to and including termination. All employees are encouraged to notify us of any potential violations.

DRUG AND ALCOHOL POLICY

This McDonald's restaurant, in conjunction with the Federal Drug Free Workplace Act of 1988, hereby establishes a Drug and Alcohol Policy. The purpose of this policy is to comply with all local, state and federal regulations regarding the illegal use and abuse of drugs and alcohol and to eliminate any unsafe working conditions created by the presence of an employee under the influence of drugs and/or alcohol. McDonald's is committed to maintaining a safe and productive work environment that promotes both the health and welfare of our employees and the public. The abuse of drugs and alcohol is incompatible with that goal. The intent of this program is to provide a drug-free and safe work environment in which each employee can earn a livelihood and to protect company property, equipment and operation.

This policy is being implemented for the benefit, safety and welfare of all employees. Make every effort to read and understand the policy and how it affects your employment and responsibilities. All employees are expected to comply fully with this policy as a condition of employment.

ABUSE AND POSSESSION OF ILLEGAL DRUGS AND CONTROLLED SUBSTANCES

It is McDonald's position that the use of illegal drugs or controlled substances, on or off the job, has a detrimental impact upon job performance and threatens the health, safety and welfare of other employees. The use, sale, transfer, purchase, possession or storage of illegal drugs or controlled substances while in the course of employment, on or off McDonald's property, is prohibited. Any employee found in violation of this policy while on duty or on McDonald's property or while performing McDonald's business will be subject to immediate discharge and, in appropriate situations, will be reported to law enforcement authorities. McDonald's expects its employees to report to work fit for duty with no illegal drugs in their bodies. "Illegal drugs" includes any drug which is not legally obtainable under

federal, state or local law, or is legally obtainable, but was not prescribed to you, or was prescribed to you and was taken in a manner contrary to your physician's instructions. Compliance with this policy is a condition of continued employment. Violation of this policy will result in disciplinary action up to and including termination of employment.

ABUSE OF ALCOHOL

It is McDonald's position that the presence of alcohol in the body while on the job, and the abuse of alcohol on or off the job, has a detrimental impact upon job performance and threatens the health, safety and welfare of other employees. The presence of alcohol in the body while on McDonald's property or while performing

McDonald's business is prohibited. Possession of alcoholic beverages on McDonald's property is prohibited. Compliance with this policy is a condition of continued employment. Violations of this policy will result in disciplinary action which may include, among other things, termination of employment.

SOCIAL MEDIA POLICY

Online Communications Policy for Restaurant Employees of this Independent Owner Operator

If you participate in online conversations about any McDonald's, its employees or products, it is important that you do it in a way that is safe, appropriate and legal. The intent of this Policy is not to restrict the flow of useful and appropriate information, but to minimize the risk to you, your coworkers and to this McDonald's and the McDonald's Brand.

Because we want to provide 100% customer satisfaction, this independent McDonald's Owner Operator prohibits engaging in all personal online communications during working time or in working areas, even when using your personal electronic communications tools such as cell phones and other mobile devices. You may participate in the crew website StationM (stationm.com).

As an employee of this Independent McDonald's Owner Operator, people may think your views are the views of this and/or any other McDonald's. When you participate in any online communications or blog discussing McDonald's, make it clear that you are an employee of this McDonald's and that your views and opinions are yours and not those of this and/or any other McDonald's.

Know the Rules

- ¥ Do follow the policies in the handbook and the policies displayed in your restaurant.
- ¥ Managers must exercise caution and sound judgment if interacting with subordinates on Facebook or similar social media sites. Participating in such forums with subordinates may increase the potential to violate these rules and policies. For example, it may not be sound judgment for Mangers to "friend" minor employees under the age of 18.
- ¥ Do think about what you will say and about disclosing your personal details. Correct any mistakes that you make. You post material at your own risk and you are personally responsible for the content of your communications.
- ¥ Do respect your coworkers' privacy. It is a violation of this policy to share in any online communications personal information about your coworkers (like

- religion, health, or any identifiable information that may relate to a safety issue, such as work schedules, phone numbers, residence).
- ¥ Do not engage in any personal online activity including texting or engage in personal cell phone use while on working time or in working areas.
- ¥ Do not speak or claim to speak on behalf of any McDonald's in your online communications.
- ¥ Do not discuss or disclose employees, customers, franchisees, or suppliers by name without their permission.
- ¥ Do not post material that is bullying in nature, abusive, profane, or otherwise inappropriate regarding McDonald's, its products, our employees, officers, customers, suppliers, franchisees, and competitors.
- ¥ Do not use McDonald's logos or copyrighted materials. Do not misuse our trademarks in your online communications.
- ¥ Do not disclose or comment on confidential information of any McDonald's, including the restaurant where you work. For example: sales figures, guest counts, business plans, or how food or marketing promotions are doing.
- ¥ Do not post any photos or video of the inside of your McDonald's restaurant, including those of coworkers, customers or work events. Do not post photos or video of employees in McDonald's uniforms on any website.
- ¥ Do not use blogs, Facebook, or other external websites for restaurant communications.

Remember: If you fail to follow these policies, it may result in disciplinary action, up to and including termination.

Questions: If you have questions regarding this policy, contact your supervisor or your Owner/Operator.

The provisions of this independent McDonald's Owner Operator's policy as well as procedures and manuals that the Owner Operator issues from time to time are guidelines and do not establish contractual rights between this McDonald's and any of its employees. This independent McDonald's Owner Operator is an "at-will" employer which means that employment can be terminated by the Owner Operator with or without cause or prior notice, at any time. This McDonald's reserves the right to amend this policy and other policies and practices without prior notice, at any time.

SEAT BELT POLICY

This McDonald's Restaurant recognizes that seat belts are extremely effective in preventing injuries and loss of life.

It is a simple fact that wearing your seat belt can reduce your risk of dying in a traffic accident by 45 percent in a car and by as much as 60 percent in a truck or SUV.

We care about our employees and want to make sure that no one is injured or killed in a tragedy that could have been prevented by the use of seat belts.

Therefore, all employees must wear seat belts when operating a company-owned vehicle, or any vehicle on company premises or on company business; and all occupants are to wear seat belts or, where appropriate, child restraints when riding in a company-owned vehicle, or in a personal vehicle being used for company business.

All employees and their families are strongly encouraged to always use seat belts and the proper child restraints whenever they are driving or riding in any vehicle, in any seating position.

DISTRACTED DRIVING POLICY

This McDonald's Restaurant recognizes that vehicle accidents are the number one cause of workplace fatality.

The National Safety Council states that 28% of accidents -1.6 million accidents per year - can be attributed to cell phone talking and texting while driving.

Distracted driving takes both the driver's eyes and concentration off of the road. This lack of attention to the road leads to preventable crashes and injuries. Distracted driving causes preventable accidents that could result in civil or criminal liability. Employees are required to minimize all distractions while driving on company business.

Refusal to comply with this policy could result in disciplinary action up to and including termination.

- ¥ Do not use cell phones while driving. Pull over and place the vehicle in park to answer a cell phone call or to make an outbound phone call.
- ¥ The National Safety Council does not recognize hands-free devices as a suitable, safe option for hand-held cell phones. Phone conversations while driving constitutes a distraction and is therefore prohibited.
- ¥ In the event that the driver needs directions to a facility, pull the vehicle over and place the vehicle in park to get directions.
- ¥ Never text message, use websites or dial phones while driving. Pull over and place the vehicle in park to use cell phones.
- ¥ Using applications or websites on multi-function phones while driving is prohibited.
- ¥ Reading of maps or map printouts while driving is prohibited.
- ¥ Manipulating laptop computers while driving is prohibited.
- ¥ Eating while driving is prohibited.
- ¥ Reading printouts or publications while driving is prohibited.
- ¥ Grooming or applying makeup while driving is prohibited.
- ¥ Make all settings to seats, mirrors, radio and heat/air conditioning prior to using the vehicle. Making adjustments to these vehicle components while driving constitutes distracting driving.
- ¥ Report all vehicle maintenance needs or hazards before the end of your work shift.
- ¥ Maintenance needs or vehicle hazards can create distractions for drivers.

McDONALD'S COMMUNITY CITIZENSHIP

It's important to know that our McDonald's is committed to serving its communities

changing needs. As the largest restaurant business system, with an extremely high public awareness, we are often looked to for leadership on issues which directly and indirectly relate to our reputation.

In this section, we'll cover three issues which are important to us and our customers:

¥Environment

¥Nutrition

¥Working Students

McDONALDS AND THE ENVIRONMENT

We believe we have a special responsibility to protect our environment for future generations. This responsibility comes from our unique relationship with millions of customers worldwide whose quality of life tomorrow will be affected by how we guard the environment today. We share their belief in their right to exist in an environment of clean air, clean earth and clean water.

We look at every part of our business to determine its impact on the environment, and take action beyond what is expected if we feel those actions will help leave future generations an environmentally sound world.

Our environmental commitment and activities are guided by the following principles:

¥Effectively Managing Solid Waste. We are committed to taking a "total lifecycle" approach to solid waste. We look at ways to reduce materials used in production and packaging, as well as diverting as much waste as possible from the solid waste stream. In doing so, we will follow three courses of action: reduce, reuse and recycle.

REDUCE. We will take steps to reduce the weight and/or volume of the packaging we use. This may mean eliminating packaging, adopting thinner and lighter packaging, changing manufacturing and distribution systems, adopting new technologies, or using alternative materials. We will continue to search for materials that are environmentally preferable.

REUSE. We will implement reusable materials whenever feasible within our operations and distribution systems as long as they do not compromise our safety and sanitation standards, customer expectations, nor are offset by other environmental or safety concerns.

RECYCLE. We are committed to the maximum use of recycled materials in constructing, equipping and operating our restaurants. We are already the largest user of recycled paper in our industry, applying it to tray liners, napkins, Happy Meal boxes, carry-out bags and carry-out trays. Through the "McRecycle USA" program, McDonald's maintains the industry's largest collection of information on recycling suppliers, and we will spend a minimum of \$100 million a year on the recycled materials of all kinds. We are also committed to recycling and/or composting as much of our solid waste as possible, including such material as corrugated paper, polyethylene film and paper.

¥Conserving and Protecting Natural Resources. We will continue to take aggressive measures to minimize energy and other resource consumption through increased efficiency and conservation. We will not permit the destruction of rainforests for our beef supply. This policy is strictly enforced and closely monitored.

¥Encouraging Environmental Values and Practices. We believe we have an obligation to promote sound environmental practices and to provide educational materials in our restaurants and in our communities' schools.

McDONALD'S AND NUTRITION

Since McDonald's opened its first restaurant in 1955, the company has always responded to the changing needs and tastes of our customers. We should all feel proud of the food we serve and be aware of the significant gains we continue to make in the nutrition area.

It's important to understand and to share with your customers that McDonald's food can fit into any well-balanced diet. The key word is balance, and it has led to many of our menu additions, such as salads, parfaits and all vegetable frying oil. Refer your customers to the nutrition and ingredient information on our tray liners if they would like more information about our food. We are the first company in our industry to make this information available to our customers.

McDonald's is committed to developing new menu items throughout history to offer our customers the taste and nutrition variety they want.

McDONALD'S AND WORKING STUDENTS

With more than 32,000 restaurants worldwide, McDonald's is one of the country's largest employers of young people. Along with this leadership comes an important responsibility: To see that education and school work are the top priorities of our school age employees and to make sure that their job experience complements, rather than detracts from, their education.

We subscribe the following principles to our restaurants:

- ¥ Education is a significant priority. There is no question that, between education and employment, education comes first.
- ¥ To make sure that education comes first, McDonald's provides flexible working hours to accommodate classes, homework assignments, and extracurricular activities.
- ¥ Grades and school attendance should never be compromised by excessive or late working hours.
- ¥ McDonald's provides training, skills development, and work experience which teaches the importance of responsibility, self-discipline and superior achievements.
- ¥ McDonald's complies with all laws concerning the employment of minors and continues to commit to policies which go beyond local requirements.
- ¥ We take a leadership role in working with parents, educators and students on educational issues.
- ¥ McDonald's believes in supporting education by recognizing our employees' scholastic achievements.

GLDN NUGTS, Inc. CODE OF CONDUCT AND ETHICS

Introduction

GLDN NUGTS, Inc. (or, the "Company") has adopted this Code of Conduct and Ethics for all its executive officers, management personnel and employees. GLDN NUGTS, Inc. believes this Code is an essential tool that will guide the Company in upholding our values while continuing to provide a safe, ethical working environment where we can provide quality products and outstanding customer serve GLDN NUGTS, Inc. has long believed in dealing with all persons fairly, honestly, and with genuine hospitality and respect. To support that commitment, we require our executive officers, management personnel and employees to conduct themselves at all times in accordance with the highest standards of ethical and responsible conduct.

The purpose of this Code of Conduct and Ethics is to promote a business climate that exudes integrity, including the ethical management of actual or apparent conflicts of interest between personal and professional relationships; to promote full, fair, accurate,

timely and understandable disclosure of adverse events to the applicable authorities, where appropriate; and to promote compliance with not only all Company policies and procedures, but also, and especially, with all applicable federal, state and local laws and regulations.

Although it is impossible to address every conceivable situation, it is the intent of this Code to require strict standards of honesty, integrity and ethical conduct for all GLDN NUGTS, Inc. executive officers, management personnel and employees at all times. This Code is an integral part of the policies and procedures governing each of us at GLDN NUGTS, Inc. Therefore all executive officers, management personnel and employees must comply with both the specific standards of this code and the intent of its policies. Nothing in this Code prohibits or restricts the Company from taking disciplinary action on any matters pertaining to employee impropriety, regardless of whether they are expressly discussed in this code. Every executive officer, management personnel and employee is required to receive, read and understand, and authenticate their receipt and understanding of the Code.

We strongly encourage employees to seek advice or clarification promptly when unsure about proper actions or practices. Even where the law is permissive, GLDN NUGTS, Inc. chooses the course of highest integrity. Since even shades of dishonesty invite demoralizing and reprehensible judgments, the Company expects compliance with its standard of integrity throughout the organization—at every level and in every action—and will not tolerate employees who achieve results at the cost of violation of law or who deal unscrupulously. When in doubt, employees should contact their supervisor or the Compliance Officer.

RESPONSIBILLITIES

GLDN NUGTS, Inc. Responsibilities

GLDN NUGTS, Inc. will provide a work environment in which we can foster, recognize and follow high standards of ethical behavior. In order to accomplish this, GLDN NUGTS, Inc. will:

- Maintain an effective Compliance and Disclosure Program, pursuant to our company's objective of maintaining a working environment where high ethical standards are the norm;
- Provide employees with appropriate training opportunities on the GLDN NUGTS, Inc. Code of Conduct and Ethics and federal, state and local laws and regulations applicable to our business practice;
- Provide access to resources for employees to obtain advice on appropriate workplace conduct or through which they may report people suspected of known illegal or unethical activity, including the company's Compliance Officer.
- Investigate all reported misconduct in a timely and appropriate fashion while protecting

such persons from retaliatory acts, and reporting the findings of any internal investigation that result in determination of an adverse event to the appropriate authorities, including the United States Attorney. In conducting investigations we will strive to maintain the confidentiality of the reporting persons, provided that certain legal investigations and processes may necessitate disclosure.

• Respond to each reported violation where misconduct is found to have occurred with appropriate disciplinary action up to, and including, separation of employment.

Employee Responsibilities

GLDN NUGTS, Inc. expects its employees to comply with both the letter and the spirit of the GLDN NUGTS, Inc. Code of Conduct and Ethics. It is also expected that all Company policies and procedures, as well as applicable federal, state and local laws and regulations will be upheld to their fullest extent. All GLDN NUGTS, Inc. employees are required to:

- Read, understand, and follow the GLDN NUGTS, Inc. Code of Conduct and Ethics and the policies and procedures relating thereto;
- Complete Code of Conduct training;
- Understand and follow all rules, regulations and laws that govern the Company;
- Encourage among fellow employees compliance with this Code, Company policies and procedures, and all applicable federal, state and local laws that govern the company;
- Fully and honestly cooperate with all compliance and disclosure reviews and investigations, should employee participation be requested;
- Be vigilant of any situations that could result in violation(s) of the GLDN NUGTS, Inc. Code of Conduct and Ethics, other Company policies and procedures, and/or any federal, state or local laws or regulations;
- Seek assistance when in doubt of how to handle a situation that could potentially conflict

with our Code of Conduct and Ethics, other policies, or any laws or regulations;

• Promptly report any known or suspected conduct of a dishonest, unethical or illegal nature, including violations of this Code or of Company policy or procedure. These instances may be reported to an employee's immediate supervisor, or if such activity involves that supervisor or the employee is uncomfortable reporting through that channel, he or she should contact the Compliance Officer directly.

Manager and Supervisor Responsibilities

Managers and supervisors are responsible for setting an example by demonstrating – and expecting those who report to them to also demonstrate – high standards of professional conduct and ethical behavior. We require managers and supervisors to:

¥ Make certain that each direct report is aware of and understands the GLDN NUGTS, Inc. Code of Conduct and Ethics, relevant Company policies and procedures, and how they apply;

- ¥ Provide resources and guidance as needed to answer employee questions about appropriate conduct;
- ¥ Encourage discussion regarding the principles espoused in this Code; Instill comfort in employees that the Code is supported throughout the organization, especially by executive management, and that questions about ethical conduct or concerns regarding misconduct can be conveyed through the appropriate channels without fear of punishment, reprisal or retaliation;
- ¥ Strive to be approachable and available to all employees, and
- ¥ Take prompt action to address any known inappropriate workplace conduct, whether observed or reported.

Compliance Officer Responsibilities

- ¥ GLDN NUGTS, Inc.'s Compliance Officer is responsible for implementing and overseeing ethical and legal compliance with the Code of Conduct and Ethics and its related processes, with duties including, but not limited to:
- ¥ Insure timely program and policy review;
- ¥ Insure that all employees and members of management are familiar with and understand this Code of Conduct and Ethics;
- ¥ Provide support for and enforcement of the Code of Conduct and Ethics
- ¥ Design adequate and effective Company policies and procedures to support the Code of Conduct and Ethics.
- ¥ Enact disciplinary measures against violations of the Code and/or Company policies and procedures;
- ¥ Lead internal investigations and make disclosure of Reportable Events to the appropriate authorities;
- ¥ Safeguard the privacy of, where possible, and protection from retaliatory acts against those who report perceived or actual acts of misconduct, in good faith, through the appropriate reporting channels, and
- ¥ Insure fulfillment of the Company's obligations to all applicable state, federal and local laws and associated regulations.

EMPLOYEES AND THE WORKPLACE

Safety and Security

At the core of GLDN NUGTS, Inc.'s values is the belief that every employee has the right to work in an environment that is safe and free of hazards.

GLDN NUGTS, Inc. is committed to conducting operations in ways that reasonably protect the life, health and safety of our employees and the public.

It is extremely important that GLDN NUGTS, Inc. maintains high corporate standards for security in which risks are appropriately identified and managed. The Company continues to focus on ensuring reasonable protection of our corporate assets: Employees; facilities; equipment; products and inventory control, and information. To achieve this

most effectively, security standards have been incorporated into the Company culture and are the responsibility of each and every GLDN NUGTS, Inc. employee.

It is critical for GLDN NUGTS, Inc. to sustain a working environment in which we do not knowingly violate safety laws, rules, regulations and policies. This is achieved through safety training, especially for those charged with transportation of our products during the course of their jobs. Those who may encounter hazardous materials in the course of their work receive extensive training on interaction with and handling of hazardous materials.

Employees should notify their immediate supervisor promptly in the event one becomes aware of any non-secure, unsafe or dangerous situations at work so that the condition may be addressed and corrected. It is the responsibility of all GLDN NUGTS, Inc. employees to contribute to the safety and security of our working environment.

Equal Employment Opportunity and No Harassment

All Company activities are conducted without regard to race, religion, creed, color, sex, national origin, age, sexual orientation, disability unrelated to job performance, Vietnam era/disabled veteran status, or any other basis prohibited under applicable federal, state, or local laws. All employment decisions will be made in accordance with these principles, and all employment related programs will be administered in a manner consistent with these principles.

GLDN NUGTS, Inc. also maintains a strict prohibition against sexual, racial, religious, sexual orientation or other harassment prohibited by law. Such harassment, like other types of discrimination, is a violation of both Company policy and the law. GLDN NUGTS, Inc. takes violations of this nature seriously and will handle all instances of reported discrimination during the course of employment, whether committed by a GLDN NUGTS, Inc. employee or a non-GLDN NUGTS, Inc. employee, with vigorous investigation and appropriate disciplinary measures, up to and including separation of employment and/or notification of the proper authorities. All GLDN NUGTS, Inc. employees are responsible for complying with this position and reporting actual or suspected instances of harassment to their supervisor, the Compliance Officer.

If an employee believes he or she has been harassed or discriminated against, either by an employee or non-employee, during the course of his or her employment the employee should immediately report the incident to the Compliance Officer. Complaints will be investigated promptly and in the most confidential manner feasible given the circumstances. GLDN NUGTS, Inc. will uphold this defense of persons who may have been violated, as well as all applicable state, federal and local laws pertaining to equal opportunity. GLDN NUGTS, Inc. commits to take appropriate remedial action in instances where a discriminatory action is found to have occurred.

Diversity

Diversity is another one of GLDN NUGTS, Inc's. core values. We embrace differences because they make us a stronger organization. Inclusion of different backgrounds, languages, knowledge and experience, ages, cultures, ethnicities, and genders, to name a few, is important to our understanding of the marketplace. It also enhances our ability to do business and serve our customers well. We actively strive to maintain an inclusive and positive work environment for all employees — one in which each person is treated with dignity and respect and feels welcome to contribute to the success and growth of the Company.

Work Authorization and Identity

Various U.S. laws prohibit the employment of foreign nationals who are not authorized to work in the United States. It is the Company's earnest policy to abide by these laws as well as all others. No one should feel any pressure whatsoever to hire workers who cannot lawfully be employed by the Company.

The company is required to check the identity and work authorization documents of every person at the time of hire. The company is required to accept documents that "reasonably on their face appear to be genuine." Illegal false identity documents are unfortunately fairly easy to obtain. In a work force as large as the Company's, from time to time unauthorized aliens will successfully use convincing false documents to obtain employment without the company's awareness. It is illegal to have anything to do with making, using, or accepting identity or work documents known to be false or misused by an imposter. From time to time, information may surface that suggests a worker is not authorized for employment. This may include letters from the Social Security Administration that information about a worker does not match its system, reports from a health benefits administrator that a worker's identity matches that of another person, unusual patterns among unique documents from employees, reports by a worker about himself, or other circumstances. Without making harmful assumptions, managers should follow up on any suspicious circumstances and should report them to the Compliance Office if they cannot be resolved.

A company cannot use outsourcing to obtain by contract the labor of persons known to be unauthorized. Therefore, information that a contractor providing services to the Company employs unauthorized aliens should be reported just as if the worker were an employee of the Company.

At the same time, the Company's work force is diverse and the Company is proud to have legal immigrants adding to this diversity. The mere fact that someone may have been born outside the United States or may look or sound foreign is not evidence that the person is an unauthorized alien. It is important that our efforts to obey the law do not make legal immigrants and new citizens in our work force feel uncomfortable in any way.

It is also unlawful to discriminate against a worker on the basis of national origin, including foreign appearance or accent, or on the basis of citizenship status.

Workplace Violence Prevention

GLDN NUGTS, Inc. is completely intolerant of workplace violence. The Company's commitment to providing a safe environment for all of its employees and non-employees includes maintaining a strict posture against violence of any type at any of its premises. GLDN NUGTS, Inc. will not permit any conduct, by actions or words, reasonably perceived as threatening or intimidating against any employee, customer, or visitor.

GLDN NUGTS, Inc. also strictly prohibits the possession of weapons on Company property or in Company vehicles.

It is everyone's business to prevent violence in the workplace. Employees should IMMEDIATELY report any threatening or violent behavior in the workplace to their supervisor. In cases where someone is in imminent danger of physical harm, it is expected that an employee will contact local law enforcement immediately (911). Violating the safety of GLDN NUGTS, Inc.'s workplace is a serious offense and will be remedied with proper disciplinary measures, up to and including separation of employment and notification of the appropriate authorities.

Substance Use and Abuse

GLDN NUGTS, Inc. is strongly committed to maintaining a drug and alcohol free work environment. Consistent with the spirit and intent of this commitment, the Company prohibits the use, possession, purchase, manufacture, distribution, dispensation, illegal sale or being under the influence of alcohol or drugs, during the work day, including breaks, meals, and overtime, on Company property and in Company vehicles. If otherwise directed by a physician and under attentive medical care, use of prescription medications must be substantiated in writing with a note from your doctor. Suspected or actual violations of this policy should be reported immediately to an employee's supervisor, or the Compliance Officer. Offenses of this nature are taken seriously by management and will be addressed with disciplinary action up to and including notification of the proper authorities and separation of employment.

Environmental Responsibility

Caring for the environment is among Mathews Management's central values; we will strive to do business in a way that is environmentally responsible and in compliance with all environmental laws, rules and regulations as well as related Company policies and procedures. Mathews Management has the highest interest in maintaining its position as a leader in environmental responsibility among the oil and gas industry. Through environmental programs based on sound scientific principles, we will manage air, land, water and wildlife resources with which we interact and conduct our business in an environmentally sensitive and responsible manner.

Customer, Vendor, and Business Relationships

GLDN NUGTS, Inc. supplies essential products and services to our customers and recognizes our responsibility to deliver those reliably and efficiently. Any time we fail to live up to a commitment, hard-earned customer trust is damaged. Employees must be sure to respect these relationships, always remembering that they represent the Company when working with our customers, vendors, and suppliers. We must strive to meet our customer needs professionally, efficiently, promptly and reasonably.

Building and maintaining good working relationships with all business partners is critical to GLDN NUGTS, Inc. success. Credibility with our customers depends on our ability to fulfill our commitments, including our contractual obligations with our vendors and suppliers. This means being fair, honest and objective in all our business dealings. GLDN NUGTS, Inc. will uphold high ethical standards of internal control regarding our products and inventory. The Company commits to its employees, customers, vendors, suppliers and consultants that we respect our established and potential business relationships as critical to our continued success.

Accounting Principles

GLDN NUGTS, Inc. requires adherence to the conventions, rules and procedures necessary to follow generally accepted accounting principles within the United States.

All Company books, accounts and other records must reflect company business fairly and accurately and in reasonable detail. Directors, officers and employees must not intentionally make or maintain records that conceal or disguise any aspect of company transaction.

The Company and its executive officers, management personnel, and employees, especially those charged with maintaining the financial records of the company, are responsible for generating reliable financial information on a periodic and timely basis.

The Company's accounting and financial records shall be maintained on the basis of valid, accurate and complete data with adequate supporting information to substantiate all entries to the books of account. All executive officers, management personnel and employees involved with creating, processing, recording and reporting accounting information shall be held responsible for its integrity.

Books and accounting records shall be maintained in compliance with generally accepted accounting principles (GAAP) and other appropriate accounting methods and principles, and properly established financial controls shall be strictly followed. There shall be no withholding of any information from or by management, or from GLDN NUGTS, Inc. auditors, which is material to the company's financial condition.

Any officer, management personnel or employee who discovers any financial or accounting item or situation of questionable nature, omission, falsification, inaccuracy or illegality, shall report such violation to their supervisor, the Senior Vice President of Finance, the Compliance Officer. Employees may remain anonymous at their choosing, but should they opt to identify themselves their identities will remain strictly confidential, to the extent possible, and they are protected by the Company from acts of retaliation or retribution.

CONFLICTS OF INTEREST

General

A conflict of interest can arise any time an executive officer, management personnel or employee faces a choice between a personal interest (financial or otherwise) and the interest of GLDN NUGTS, Inc. Real and apparent conflicts of interest may arise from ownership interests; investments; outside employment; untoward relationships, off-contract, or otherwise inappropriate arrangements with vendors, suppliers, or customers; off-book, unrecorded or fraudulently recorded fiscal transactions; the employment of relatives, and accepting or providing lavish gifts, meals and/or entertainment.

It is important to understand that appearances do matter. Employees should always be aware of how their actions might be perceived—by our customers, regulators, neighbors and local communities—and avoid acting in ways that could be interpreted as conflicting with the interests of the Company.

We expect our executive officers, executive management personnel and employees to avoid conflicts of interest, either real or perceived, and to handle those that may surface in an ethical and honest manner. Conflicts of interest and potential conflicts of interest should be fully disclosed. If in doubt regarding a potential conflict of interest, employees should discuss it with their supervisor or the Compliance Officer.

Conflicting Internal Business Goals

Conflicts of interest may also arise as part of our jobs. Occasionally, we may find our attempts to achieve incentive compensation goals are seemingly in conflict with larger corporate responsibilities. In such cases, employees' responsibility is to the Company, ethical behavior and legal compliance. Employees should not compromise ethics for individual or Company gain.

Corporate Opportunities

We strictly prohibit our executive officers, management personnel, and employees from personally taking advantage of business opportunities that conflict with GLDN NUGTS, Inc. interests or put the Company at a disadvantage. Furthermore, we prohibit taking personal advantage of opportunities that may arise through the use of Company property, products, information, and position in the market. All GLDN NUGTS, Inc. associates are

strictly forbidden from engaging in business arrangements that compete with the Company.

Outside Employment

Employees should use care and good judgment when seeking or accepting any outside employment to assure that the employment does not conflict with, or affect the performance of, their responsibilities at GLDN NUGTS, Inc.

Employees may not secure additional employment unless (1) the outside employment is in a non-related business; (2) the employee is meeting and continues to meet the performance standards aligned with his/her position at the Company; and (3) the employee can remain subject to the Company's scheduling demands to the same extent as employees who do not hold outside employment.

All potential outside employment arrangements must be pre-approved with express written permission from management. If employees have any question about the propriety of outside employment, they should discuss the matter with their supervisor or the Compliance Officer.

Relationships with Government and Public Officials

Employees of Mathews Management occasionally contact government and regulatory officials to keep them informed about our operations and positions on issues. Employees responsible for these contacts must understand and obey the laws governing lobbying activities and reporting requirements. They should also be familiar with specific rules set by individual agencies or other governmental bodies.

Employee Political Activity

We encourage our employees to become involved in civic affairs and to participate in the political process. This is a way in which we can all practice good citizenship and make meaningful contributions to our communities. However, any political activity on an employee's own behalf must occur strictly in an individual and private capacity and not on behalf of the Company. Employees are also free to seek public office so long as they do not use Company property or equipment for this purpose. Employees' political involvement must be contained to strictly personal time.

Charities, Volunteering

GLDN NUGTS, Inc. also encourages its employees to participate in volunteering for charitable activities, so long as they do not interfere with the ability to do one's job or create a real or apparent conflict of interest. From time to time, the Company may sponsor or participate in charitable events during regular working hours. The Company may consider it an exception where charitable or volunteer activities are sponsored by the Company and the Company has approved the regular working time to be commuted from ordinary business to charity or volunteer work.

Gifts, Meals and Entertainment

Accepting and providing gifts, meals and entertainment may be common aspects of business, however it is important to understand what is and what is not appropriate to ensure no real or perceived conflict of interest is created. If an employee has a question regarding what constitutes a lavish gift, meal or entertainment, he or she should contact his or her immediate supervisor or the Compliance Officer. Granting gifts, meals and/or entertainment to regulators is strictly prohibited; violations of this position will be handled with appropriate disciplinary measures, up to and including separation of employment.

PROTECTING THE INTERESTS OF THE COMPANY

Protection and Use of Company Assets

GLDN NUGTS, Inc. executive officers, management personnel and employees should strive to maintain and protect Company property, facilities, equipment and other assets. Company assets, including inventory, should be used for legitimate business purposes only, and only for which they are intended and approved. Under no circumstances are Company assets to be used in the commission of a crime. Company assets subject to this principle include, but are not limited to, Company phones, long distance services, voice mail, internet access, equipment, inventory, supplies and materials, and e-mail addresses. Practices incongruent with this position are considered terminable offenses. Any employee who becomes aware of or suspects the misuse of Company assets is obligated to notify his or her supervisor, the Compliance Officer.

The Company considers failure to report a known or suspected violation of this principle an act in collusion with the perpetrator; in the event a misuse of Company assets occurs and an employee who knows of but fails to report the offense is identified, that person will also be subject to disciplinary measures up to and including separation of employment.

Fraud and Theft

Acts of fraud or embezzlement affecting the Company's property, funds, securities, inventory, products or other assets are strictly prohibited and will be met with the direst of consequences the company can legally impose, including notification of the appropriate authorities, pursuit of criminal and civil penalties, and separation of employment. Willful damage or destruction of property or materials belonging to the Company, our employees or customers will be met with the same posture, as will any act that attempts to or results in the diversion of any fuel, natural gas, alcohol or tobacco product, or any other product or service product produced, distributed or provided by the Company.

Competition and Fair Dealing (Antitrust)

Antitrust and trade regulation laws prevent businesses from unfairly restricting other businesses from competing in the marketplace. This includes such practices as price-fixing; product diversion; violation of established contractual relationships with vendors

and/or suppliers; limiting production or supply, and making agreements to drive competitors out of business or to refuse to buy or sell to another business.

GLDN NUGTS, Inc. maintains that it will compete aggressively, but fairly and honestly, and in compliance with antitrust and trade-regulation laws and regulations. Company policy prohibits taking unfair advantage of anyone and taking part in agreements to restrict competition in any way.

Furthermore, Company policy expressly prohibits employees altering the manner in which the Company competes in the marketplace through unethical, unapproved, or illegal means. Mathews Management expects each of our executive officers, management personnel and employees to deal fairly and in good faith with our customers, employees, suppliers, regulators, business partners, competitors and others.

Confidential Information

GLDN NUGTS, Inc. safeguards all proprietary and confidential information regarding the Company and our business affairs. Such information is a valuable business asset, the disclosure of which could adversely affect the Company's interests and competitive position in the marketplace.

Information falling into this category must be kept in strict confidence and should not be disclosed, without authorization, to anyone outside the Company or to other employees of the Company who do not have an immediate, business "need" to know the information. As a matter of practice, it is best if all employees keep any information entrusted to them closely guarded, and secure their files and workspaces at all times—especially when away from one's primary workstation. Moreover, public discussion of Company business should be avoided at all times, and under all circumstances, irrespective of the "public" nature of any piece of information.

Employee and Customer Information

Personal data about executive officers, management personnel and employees and data relating to customers and suppliers may be accessed only by persons with a business need to know this information in order to perform their jobs. It is inappropriate and prohibited for executive officers, management personnel and employees to disclose such data both within and outside the Company unless there is a legitimate business or legally required need to do so.

All Company officers, management personnel and employees must comply with all laws relating to access and dissemination of employee information. Should private or confidential information become inadvertently disseminated to those without a legal or legitimate business need to know, please notify a supervisor immediately in order that the matter may be addressed and promptly remedied to the extent possible. Questions

regarding or reports regarding violations of this nature should be reported to an immediate supervisor, or the Compliance Officer. Deliberate violations of this policy will be met with appropriate disciplinary action, up to and including separation of employment.

External Communications

Communication with the media, customers, regulators and the public are the responsibility of designated spokespersons within the Company. Employees should refer inquiries from the media and the public to the Company President, CEO and Compliance Officer. From time to time, events deemed newsworthy by the media may occur at or around GLDN NUGTS, Inc. facilities. Company policy strictly prohibits communications or interviews with members of the media without prior management approval. Questions regarding this policy or media inquiries should be directed to an immediate supervisor, or the President, CEO and Compliance Officer.

COMPLIANCE

Compliance with all Applicable Laws

To the extent not specifically discussed within this Code of Conduct, GLDN NUGTS, Inc. expects all executive officers, management personnel and employees to comply with all applicable laws, rules and regulations of federal, state and local government bodies. Employees will use their best efforts to ensure compliance with all such laws, rules and regulations at all times and will duly report any known or suspected violations thereof through the appropriate reporting channels described herein.

Compliance, Reporting and Accountability

Each officer, management personnel and employee has an obligation to comply with this Code of Conduct and Ethics and to promptly report to management any known or suspected violation or dishonest, unethical or illegal conduct. This can be accomplished by speaking with an immediate supervisor, or the Compliance Officer. Reported violations will be investigated in the most confidential manner feasible and appropriate action will be taken.

Violation of this Code of Conduct and Ethics is grounds for disciplinary action up to and including separation of employment. Additionally, the Company may pursue available civil or criminal actions against violators. Furthermore, employees who knowingly make false accusations or provide false information during an investigation are subject to disciplinary action up to and including termination. Likewise, employees who know of, but fail to report, adverse events to their supervisor, or the Compliance Officer are considered by the Company to be acting in collusion with the offender. At the point where the Company learns of a knowledgeable but non-reporting person's identity where acts of malfeasance are in question, that person will be subject to disciplinary measures up to and including separation of employment.

Anti-Retaliation

GLDN NUGTS, Inc. upholds a strict policy against retaliation towards individuals who, in good faith, fulfill their obligation to report real or perceived instances of improper, unethical or illegal behavior through the appropriate channels. Every effort will be made to protect the identity of the reporting individual, to the extent possible, and reported violations will be investigated in the most confidential manner feasible. Any form of retaliation against a reporting person is an express violation of this Code and of Company policy. Retaliatory acts will not be tolerated and are subject to disciplinary action including termination. All executive officers, management personnel and employees should be comfortable and confident to report known or suspected Code, policy or legal and regulatory violations to their supervisor, or the Compliance Officer free and clear of retaliation.

Employee Handbook

This Code is in addition to any other policy of the Company, including any handbooks published for management or crew members. If there is a conflict between this Code and any other policy published by the Company, then this Code shall control.

REPORTING KNOWN OR SUSPECTED VIOLATIONS OF THIS CODE, COMPANY POLICY, OR ANY FEDERAL, STATE, OR LOCAL LAWS OR REGULATIONS MAY BE ACHIEVED THROUGH THE FOLLOWING CHANNELS:

Contact your General Manager in the manner which you feel most comfortable.

To the Compliance Officer: Contact Glen Schwartz at 918-272-4161 or contact by email at glen.schwartz@us.stores.mcd.com

UPDATING OF THE HANDBOOK

From time to time, changes and improvements in your handbook may be made to reflect any new policy or changes which might be placed into effect. This information will be passed on to you at the earliest possible time.

It is the policy of our McDonald's Restaurants to adhere to the directions set forth by McDonald's Systems, Inc. Directives from McDonald's System, Inc. supersede any information contained in the handbook.

Again, welcome to McDonald's. We look forward to working with you and we will do everything we can to make your job a pleasant one.

There are few, if any, jobs in which ability alone is sufficient. Needed also are loyalty, sincerity, enthusiasm and cooperation.

McDONALD'S OFFICE PO Box 900 Owasso, OK 74055

WELCOME!

We are glad you joined McDonald's and we look forward to working with you!

GLDN NUGTS, Inc. CREW HANDBOOK POLICY AGREEMENT

THIS PAGE TO BE SIGNED AND DATED BY EMPLOYEE AND MANAGER AND SUBMITTED

TO THE OFFICE WITH THE NEW HIRE PAPERWORK

OVERVIEW

I have been furnished a copy of, and understand all policies contained in the Crew Members Handbook, including, but not limited to the cash handling policy; drugs/alcohol policy; uniform policy; and the workers compensation managed care policy.

I agree to abide by all policies and understand that failure to do so may result in disciplinary action or termination of my employment.

ACKNOWLEDGEMENT OF RECEIPT OF GLDN NUGTS, Inc. CODE OF CONDUCT AND ETHICS POLICY

I have read and understand this GLDN NUGTS, Inc. Code of Conduct in its entirety and feel confident that I am well informed of the Company's Compliance and Ethics Program and the meanings and implications of the Code of Conduct and Ethics. I further assert that I understand what is expected of me as a GLDN NUGTS, Inc. employee. I have had the opportunity to ask questions, and continue to enjoy the same opportunity to seek clarification or guidance regarding ethical dilemmas I may face in the performance of my job.

Employee Signature	Date
Printed Name	
Parent Signature if Employee is Under 18 Years of Age	Date
Company Representative Signature	Date