

EMPLOYEE TIMEKEEPING POLICY

1. Purpose.

Thrushwood Farms Quality Meats, Inc., Western's Smokehouse & Meat Market, LLC, and Prairie Smokehouse Partners, LLC (collectively or individually referred to as the "Company") has instituted this Employee Timekeeping Policy to define the policy and procedures for its collection, storage, disclosure, use, protection, and destruction of the data provided by employees using the Company's timeclocks and finger scan devices. Finger scan data is provided by employees in connection with the Company's timekeeping practices, to ensure employees are accurately paid for their time worked in connection with the Company's payroll and the related financial transactions.

It is the Company's policy to ensure that employee finger scan data is used and handled in accordance with the Illinois Biometric Information Privacy Act ("BIPA") and all other applicable laws.

2. Scope.

This Policy applies to the Company's facilities in the State of Illinois and all employees using finger scan devices in those locations.

3. Employee Finger Scan Data.

As part of the timekeeping process, the Company uses timeclocks and software, equipped with finger scan devices, purchased from its third-party vendor, Kronos Incorporated ("Kronos"). The devices scan an employee's finger or fingers for purposes of verification, in connection with the Company's timekeeping functions, to ensure that employees are recognized and paid for their time worked. The devices use a secure technology that generates an encoded mathematical representation. The Company securely stores these representations at a Company controlled site or on secure space made available by Kronos in a cloud environment for that purpose. Once employment ends, the finger scan data will be permanently destroyed by the Company within 90 days. The Company is responsible for data destruction. The finger scans cannot be used as or converted into actual fingerprints.

4. Written Release.

The Company requires employees, as a condition of initial or continued employment, to sign a written release authorizing the Company, Kronos and any third-party subcontractors to collect, capture, use, store, obtain, possess, disclose or re-disclose finger scan data for activities such as timekeeping purposes, equipment servicing, database maintenance, software repair, data restoration or to maintain backup copies necessary for related activities, even if such activities never occur. Kronos and its third-party subcontractors can only access such data pursuant to the Company's instructions and authorization. The form of written release is attached hereto as Exhibit A. Employees may revoke their consent at any time by notifying the Company in writing. Company will provide reasonable accommodations to those employees who refuse to consent to the collection and use of their finger scan data as described in this policy.

5. Use, Disclosure, Protection, Storage and Destruction of Finger Scan Data.

Employee finger scan data will only be used for the purposes and related activities set forth in this Policy. The Company will not sell, lease, trade, or otherwise profit from an employee's finger scan data. The Company will not disclose, re-disclose, provide access to or otherwise disseminate any finger scan data outside of the terms of the Policy, unless:

- The employee or the employee's legally authorized representative provides consent to such disclosure;
- The disclosed data completes a financial transaction requested or authorized by the employee or the employee's legally authorized representative;
- The disclosure is required by state or federal law or municipal ordinance; or
- The disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

The Company will use the reasonable standards of care within its industry for any storage, transmittal or protection from disclosure of any finger scan data, and it will follow standards of care that are the same or greater than the standards of care that the Company uses to protect other employee data.

Company vendors and contractors, including Kronos, have publicly represented that they do not sell, lease, trade or profit from such data, and that they use reasonable standards of care within their industries for any storage, transmittal or protection from disclosure of any such data. Please see Kronos Privacy Policy at <https://www.kronos.com/privacy-policy>. The Company will ensure that Kronos and its subcontractors also comply with this Policy.

6. Policy Enforcement.

The Human Resources Department of the Company is responsible for the enforcement and administration of this Policy. If you have any questions regarding this policy or if you have questions that are not addressed in this policy, please contact Human Resources.

EXHIBIT A – WRITTEN RELEASE

As an employee of Thrushwood Farms Quality Meats, Inc., Western's Smokehouse & Meat Market, LLC, and Prairie Smokehouse Partners, LLC (collectively or individually referred to as the "Company"), I agree to scan my finger(s) on a scanning device, which was purchased by the Company from Kronos Incorporated ("Kronos"), as part of the timekeeping process. I acknowledge that the device scans my finger and creates a mathematical representation called a template that is securely stored during my employment. I understand that, once my employment ends, my finger scan data will be permanently destroyed within 90 day. The templates are used by the Company for verification and timekeeping functions. I have read and understand the Company's Employee Timekeeping Policy regarding the use, retention, protection and destruction of my template data. As a condition of my initial or continued employment, I voluntarily consent to the collection, capture, storage, access to, use, possession, obtaining of, and/or disclosure or re-disclosure of my finger scan data by the Company, Kronos and any of their subcontractors in accordance with this Policy. I provide this consent for purposes of ensuring compliance with the Illinois Biometric Information Privacy Act ("BIPA") and any other applicable privacy laws. I understand that I may revoke this consent at any time by notifying the Company in writing.