



CODE OF CONDUCT AND ETHICS





A MESSAGE FROM OUR PRESIDENT AND CEO

Dear Friends,

Casey's has grown from its humble origins in Boone, Iowa, to nearly 3,000 stores across 19 states. Throughout this journey, we have built and maintained trust with our guests and communities — one visit at a time. This trust distinguishes Casey's and is the result of our collective commitment.

Our Code of Conduct and Ethics is central to our operations, guiding us to act ethically, lawfully, and with integrity. It has shaped our business for more than 50 years and equips us to make sound decisions, even in challenging situations. I encourage you to consult the Code whenever you need guidance. It is a dependable resource to help you uphold the trust placed in us by our Team Members, communities, and investors.

Thank you for your continued dedication to Casey's.

Darren Rebelez

President and CEO



OUR PURPOSE AND VALUES

Our Purpose

To make life better for communities and guests every day.

Our Values

Our values are the same for all Team Members; they are the foundation of our character and are at the core of what makes us great as a Team. Casey's truly CARES, and our values unite all of us into a Team dedicated to serving each other, our guests, our shareholders, and our communities.

Casey's CARES



COMMITMENT

We work hard to be the best and have a good time doing it.

Ownership | Dependability | Passion

We take initiative and own our impact — large and small, near and far. We can be counted on to consistently deliver quality, convenience, and results. We're fully engaged and have fun with our work and each other.



AUTHENTICITY

We are true to our roots by being high integrity and low ego.

Humility | Transparency | Integrity

We think big and play big, but our ego is small. We're open and honest, even when it's tough. We do what we say and earn others' trust.



RESPECT

We treat people the way they want to be treated.

Inclusion | Empowerment | Recognition

We embrace differences and believe all voices have value. We trust and support each other to do the right thing. We recognize and appreciate what each person brings.



EVOLVING

We are driven to build a better future for ourselves and our business.

Learning | Development | Agility

We challenge ourselves and each other to learn from successes and mistakes. We recognize potential and invest in ourselves. We drive positive change and grow our business.



SERVICE

We put service first and take pride in caring for our guests, our communities, and each other.

Guests | Community | Team Members

We strive to provide an excellent guest experience by being Positive, Polite, Professional, and Proud. We're here for good to strengthen and sustain our communities. We support each other, work together, and win together as one Team.



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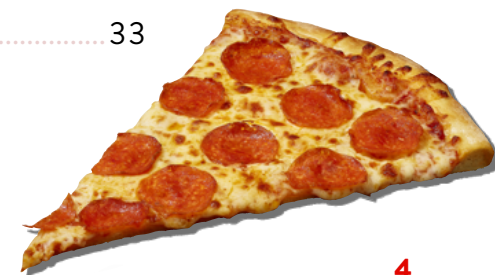
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DOING BUSINESS THE RIGHT WAY

We live our values.

Companies often measure their success in numbers of sales, stores, employees, or years in business. At Casey's, we've been successful in each of those areas.

One part of our business is harder to measure, and it is the most important: delivering great guest experiences. This is what drives every decision we make.

Where does our Code fit in?

Casey's is committed to compliance with all laws, rules, and regulations that apply to our business. Our Code helps us make sure we honor this commitment, stay true to our purpose, and ensure we grow with integrity. In our Code, you'll find:

- High-level guidance about important workplace topics.
- Tips on how to handle common ethical situations.
- Answers to everyday questions you might face.
- Decision-making tools and definitions of key terms.
- Resources to contact for help.

Who must comply with the Code?

Our Code applies to all Casey's Team Members, including Officers, as well as our Board of Directors. We are all one Team.

All Team Members have a responsibility to understand and follow the Code. The Company strongly encourages dialogue among Team Members and their leaders to make everyone aware of situations that give rise to ethical questions and to talk about how to handle those situations. The Code reflects general principles to guide Team Members in making ethical decisions and is not intended to address every specific situation that may arise.

Every day, you make decisions that affect Casey's, other Team Members, our guests, our business partners, our community partners, and others. Our Code can help you navigate challenging situations and make decisions that align with our values.





UNDERSTANDING OUR RESPONSIBILITIES

We each do our part.

As Team Members, we count on each other to:

- Know and follow the Code, our policies, and the laws that apply to our jobs.
- Regularly review the Code and acknowledge we understand it.
- Always act with honesty and integrity.
- Speak up if we see or suspect some form of misconduct.
- Cooperate with any requests for information or investigations into misconduct.
- Ask questions if we are unsure what to do.



Leaders have additional responsibilities:






- Promote a respectful workplace where open communication is valued.
- Talk to Team Members about how the Code and other policies apply to our daily work.
- Look for opportunities to discuss ethical dilemmas and challenging situations with our teams.
- Respond quickly and effectively when a question or concern is brought to our attention.
- Report violations of the Code or the law when necessary.
- Take action to prevent retaliation against anyone who reports a concern in good faith.

MAKING GOOD DECISIONS

We ask for help when we need it.

The Code doesn't have the answer to every situation, and there may be times when you're unsure what to do. Always remember, when you have a tough choice to make, you're not alone. There are resources available to help you.

Not sure? Ask yourself:

-  **1.** Is it legal?
-  **2.** Does it reflect our values?
-  **3.** Is it in line with our Code and our policies?
-  **4.** Would I be doing what's right for Casey's, other Team Members, and our guests?
-  **5.** Would I feel okay if my actions were made public?

If you can answer “**yes**” to all five questions, it's probably safe to move forward, but a “**no**” or “**I'm not sure**” to any of them means you should stop and ask for guidance. Remember, in any situation, it is always okay to ask for help.

Team Members should not be misguided by any sense of loyalty to the Company or a desire for profitability that might cause them to violate these standards. Team Members who violate the Code will be acting outside the scope of their employment and will be subject to disciplinary action.

Casey's Values Our Team Members, Partners, and Culture

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RESPECT FOR ALL

Our Team Members are our greatest strength.

Look around you — at Casey's, you'll see Team Members with a variety of ideas, experiences, and backgrounds, all coming together to give our guests our very best. This variety of backgrounds, experiences, and ideas is one of our strengths. Treating each other with respect and dignity makes Casey's stronger and better.

What can you do to promote respect at Casey's?

You can foster a culture of belonging and empowerment by:

- Living our values.
- Honoring — and celebrating — our differences.
- Treating others the way they want to be treated.
- Making sure everyone's voice is heard and included.

Casey's is an equal opportunity employer and follows all applicable federal, state, and local civil rights laws. Casey's does not tolerate unlawful discrimination against Team Members or guests because of their race, color, religion, creed, national origin or ancestry, ethnicity, sex, pregnancy, sexual orientation, gender, gender identity, age, physical or mental disability, genetic information, or any other characteristic protected under applicable federal, state, or local law.



Good to Know!

Through our Slice of Excellence Recognition Program, Casey's recognizes Team Members who are living our CARES values.

Do you think you may have witnessed discrimination or harassment?

Speak up. It's the best way to preserve our respectful workplace. If you see, suspect, or experience discrimination or harassment, immediately report your concerns without fear, knowing that Casey's prohibits retaliation against anyone who comes forward in good faith.



Q&A

I overheard a Team Member refer to a coworker using racist language. The coworker didn't hear it, and I don't want to stir up trouble, but should I say something?

You should. It's up to each of us to help maintain a respectful workplace. If you feel comfortable doing so, talk to the Team Member directly about what you heard. If not, report your concerns to your leader, Human Resources, or the [Casey's CARES Ethics Hotline](#).



Food for Thought

To find out more, see our [Discrimination and Harassment Policy](#).

TEAM MEMBER HEALTH AND SAFETY

Safety is a shared responsibility.

Keeping everyone at Casey's safe is not one person's or one department's job — it's everyone's job. Whether you work in our stores, our Store Support Center, our distribution centers, or on the road, we're all responsible for keeping Team Members and guests safe.

How can you do your part?

Put safety first:

- Follow all safety and physical security policies and procedures.
- Be alert! Report to work free from the influence of alcohol or any illegal or controlled substance that could prevent you or those around you from working safely and productively.
- Immediately report to your leader, your Division Asset Protection Manager, Casey's [Risk Management Team](#), [Human Resources](#), or the [Casey's CARES Ethics Hotline](#):
 - Accidents or unsafe practices or conditions.
 - Threats, security concerns, or acts of violence.

What is Casey's stance on weapons at work?

Unless state law provides otherwise, Casey's prohibits Team Members from carrying firearms; weapons, whether open or concealed; or dangerous substances at any time on premises owned or leased by Casey's (including vehicles).

In those states that specifically give Team Members the right to maintain a lawfully possessed firearm in a locked vehicle in their employer's parking lot, you will be permitted to maintain a firearm in your own vehicle, stored as required by applicable local law.

FOOD QUALITY AND SAFE HANDLING

We're known for our pizza!

Our pizza and prepared foods are a core piece of who we are and how we serve our communities. We want every guest to trust that the products they buy from us meet all quality and safety standards. Our reputation depends on getting this right.

What does Casey's expect of you?

From food handling and preparation to proper food storage, we expect all Team Members to follow our food safety policies and procedures and all food safety regulations. Don't come to work if you are sick, and don't cut corners — or allow others to cut corners — even when your store is busy.

Food Safety Concern?

If you have questions about, know of, or suspect unsafe practices or a food-safety incident, report them to your leader or the [Food Safety Department](#), or the [Casey's CARES Ethics Hotline](#). Whenever possible, the initial report should be made by the person who witnessed the incident.

Remember, Casey's expects all of us to participate, when needed, in any investigation relating to food quality or safety that could put our guests at risk.



Food for Thought

To find out more, see our Food Service Manual, Food Storage Policy, and Food Allergens Procedures.

AGE-RESTRICTED PRODUCTS

We take age verification seriously.

While our pizza is made for guests of all ages, some of our other products are only for adults. Whether it's a lottery ticket or a cold beer, Casey's is committed to keeping age-restricted products out of the wrong hands.

When am I required to verify the age of a guest?

Casey's is dedicated to complying with all state and federal laws, especially when it comes to age-restricted products. To learn more about when you are required to verify the age of a guest, please review the Selling Age-Restricted Products Guide. If you are unsure if a guest is required to provide valid identification for the purchase of an age-restricted product, err on the side of caution and request valid identification from the guest.

When should I refuse a sale?

If a guest is unwilling or unable to provide an acceptable form of identification, you are empowered and expected to refuse the sale. You should also refuse sales of age-restricted products when you suspect a guest is purchasing them on behalf of minors or if you suspect a guest is intoxicated. You should also refuse the sale, under any circumstance, of any alcoholic beverage during prohibited selling times.

Anything else?

Not only is it illegal to sell certain products to minors, in many circumstances it's also against the law to market or advertise these products to them. When crafting advertisements or promotions related to age-restricted products, make sure you are not targeting underage guests.



Good to Know!

Age restrictions vary from product to product and state to state, but apply to products including:

- Alcoholic and non-alcoholic beverages.
- Cigarettes, nicotine, and tobacco products.
- Vaping products.
- Lottery tickets and other lottery products.

These are just a few examples. All Team Members handling age-restricted products must complete required trainings to stay informed on the requirements at their specific location.



Food for Thought

To find out more, see our Selling Age-Restricted Products Guide.



COMPANY ASSETS

We take care of everything that makes us Casey's.

Think about your work and all the “assets” you use to do your job. Equipment, supplies, inventory, Company vehicles — even the Casey's name and logo — are all Company assets. Taking good care of them helps us better serve our guests now, and years from now!



Good to Know!

Only certain Team Members have the authority to buy goods and services, sign documents, or issue purchase orders on behalf of Casey's. If you are one of these Team Members, always follow our Delegation of Authority Policy, Signature Policy, and all our procurement procedures.

What does “taking good care” look like?

It's treating our assets with the same care as you treat your own things. That means:

- Using them the way they're meant to be used — to carry out Casey's business.
- Safeguarding them from waste, loss, damage, and misuse.
- Never borrowing, lending, or giving them away unless you have approval in advance from your leader.
- Practicing safe computing and good cybersecurity by:
 - Using only Casey's-approved hardware, software, applications, and storage devices.
 - Creating strong passwords and never sharing them with anyone.
 - Accessing our networks only through authorized applications and devices.
 - Never clicking on suspicious files or links that could put our systems at risk.
 - Immediately reporting a lost device or suspected data breach.

What about personal use?

You should avoid personal use of our Company assets. Using Company assets for your personal financial gain or doing something unauthorized, unprofessional, or illegal is always prohibited.

There is no expectation of privacy when using our systems. Anything you create, store, download, send, or receive using our systems is Casey's property and, where permitted by law, can be monitored and reviewed by Casey's at any time.

SENSITIVE INFORMATION

Information is a critical Casey's asset too.

Information drives decisions about how we run and grow our business. It tells us what's selling well (and what's not) and how well we're serving our guests. Protecting information preserves our competitive advantage in the marketplace and makes Casey's . . . Casey's.

What do you need to know?

Recognize sensitive information when you see it.

Sensitive information includes:	
Non-public information about our Company and our business partners	Personal information about Team Members, guests, and business partners
Examples: <ul style="list-style-type: none"> - Business and marketing plans - Product designs - Recipes and the way food items are made - Cost, pricing, or marketing strategies - Financial reports - Pending purchases and sales of property - Potential expansion, new locations, or acquisitions 	Examples: <ul style="list-style-type: none"> - IP address - Bank or credit card information - Social security number - Health information

Not sure if information is sensitive? Play it safe and treat it as sensitive.



What do you need to do?

Protect sensitive information every day.

- Use it only to carry out business and share it only with people at Casey's who are authorized to see it and need to know it as part of their job.
- Don't share sensitive information with anyone outside of Casey's unless there is a business reason to do so, and the appropriate protections (including a confidentiality agreement or leader permission, depending on the circumstances) are in place. If you are unsure whether the information is sensitive or should be shared, do not share it.
- Be careful not to discuss sensitive information in public places where others can hear it, such as restaurants, elevators, airports, or in our stores.
- Immediately report any unauthorized disclosure of sensitive information to the Director of Ethics and Compliance and/or the Legal Department.



A Slice of Life

One of my coworkers formerly worked for a competitor and offered to tell me about some new products being developed by their former employer. Is that okay?

No, it's not. It's usually acceptable to share general knowledge and skills learned from an old job, but new product ideas, including files, drawings, presentations, concepts, and marketing ideas — all referred to as “work product” — would be sensitive, and your coworker has a responsibility to protect that information, just as you would have a responsibility to protect our sensitive information should you ever leave Casey's.

Confidentiality protections continue even after you leave Casey's employment, regardless of circumstances.



Food for Thought

To find out more, see our Data Information Security Policy and our Corporate Information Security Policy.

ARTIFICIAL INTELLIGENCE

Artificial intelligence doesn't work without human intelligence.

There's a lot that artificial intelligence (AI) can do and a lot it can't do. We are committed to using AI responsibly, which means protecting Casey's and its data from risk and never sacrificing the "human touch" that guests have come to expect.

How do I use AI responsibly?

The quality of the work AI tools produce is only as good as the input and guidance these programs and applications receive from us. Because AI tools lack the real-world experience and context that comes with being a human, it could make the AI tools prone to errors, omissions, or misleading results. This is why you should be deliberate about what AI tools you use and how you use them. If you are authorized to use AI as part of your work, use only the tools and applications that have been vetted and approved by Casey's. Never input sensitive information or personal information into a public AI tool, and always double-check AI outputs to make sure all the information you're getting is accurate, current, and free of bias.



Food for Thought

To find out more, see our [AI Policy](#).

BUSINESS PARTNERS

Good partners can help us better serve our guests.

We work with a large network of vendors, suppliers, contractors, and other third parties. Their actions — good or bad — can have an impact on our operations and our reputation. We're careful to choose business partners who honor their obligations and, like us, make service a priority.

How do you make a good choice?

If you're responsible for sourcing products or services for Casey's, be sure to base decisions on objective criteria, such as price, quality, delivery record, and other criteria and standards as established by Casey's.

What else do you need to do?

Once a relationship is in place, stay involved. Monitor our business partners' performance to make sure they're meeting their obligations.

Be sure you are working with Casey's Procurement and Legal Teams, when needed, and follow the policies put in place by Procurement and Legal when negotiating or contracting for products or services.



Food for Thought

To find out more, see our [Supplier Code of Conduct](#) and [Supplier Handbook](#).

COMMUNITY OUTREACH

Making life better for our communities.

Casey's isn't just a business — we're neighbors. And we take pride in strengthening communities all over the heartland where we live and work. Casey's has been committed to making life better for our communities and our guests since our first store opened in 1968.

How do we make a difference on a corporate level?

Corporate responsibility lies at the core of our culture. We contribute funds, time, and talent to support both Casey's-wide programs and local causes (visit [Casey's Supports Communities | Casey's \(caseys.com\)](#) to find out more). As a Team Member, you are encouraged — but not required — to participate in these initiatives in whatever way feels right for you.



Good to Know!

Learn more about Casey's sustainability initiatives in our [Sustainability Report](#).

How do you make a difference on a personal level?

We encourage you to participate in the charitable activities that mean the most to you. Just make it clear that your personal views and actions do not represent Casey's, and don't use Company funds, time, or Casey's name without approval from your leader.

Remember, whether you are participating in a corporate-related event or volunteering on a personal level, you are the face of Casey's. Your involvement and actions may not only impact how people see you but may also impact how people see other Team Members and Casey's.



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BUSINESS RECORDS

We are all recordkeepers.

A “business record” is not just data on an accounting spreadsheet. A business record is any information we record, from timesheets and expense reports to safety and regulatory inspections and sales projections. Each of us creates and maintains business records, and each of us is responsible for making sure they’re accurate.

Why is accuracy so important?

It’s about maintaining the trust of our guests, business partners, community partners, and investors. When we keep honest, clear, and complete records, we send the message that we are operating with integrity. Do your part by following our policies and internal controls, providing supporting documentation and approvals, when required, and speaking up if you see or suspect an error.



It is never acceptable to make false claims on an expense report or timesheet, to falsify quality or safety results, to record false sales or record them early, to knowingly understate or overstate known liabilities and assets, to maintain undisclosed or unrecorded funds or “off-the-books” assets, or to defer recording items that should be expensed. No entry may be made that intentionally hides or disguises the true nature of any transaction.

You can also help by keeping, storing, and disposing of records as described in our Records Management/Retention Schedule and taking care to never destroy information that is subject to a legal hold. If you have a question about how long a business record or document should be retained, contact the Ethics and Compliance Department.



Good to Know!

Wage theft occurs when Team Members are denied the pay they’ve earned for the work they’ve done, and reliable records are one of the best tools for preventing it. Help prevent wage theft by:

- Accurately tracking the hours you work.
- Taking the meal and required breaks you are entitled to.
- Reporting any attempts to “dock pay,” make Team Members work “off the clock,” force unpaid overtime, or deny breaks.

What about financial statements, documents filed with the SEC, and other public disclosures?

We rely on you to help us:

- Provide complete, fair, accurate, timely, and understandable information and documents to investors, government agencies, and regulators, including the SEC and the public.
- Comply and cooperate with government audits, investigations, and inquiries.
- Watch for irregularities or inaccuracies, and report any suspicious activity, including:
 - Undisclosed, unrecorded, or “off-the-books” accounts.
 - Records that appear to be falsified or mischaracterized.
 - Understated or overstated liabilities or assets.
 - Costs assigned to the wrong project, contract, or time period.



Food for Thought

To find out more, see our [Records Management/Retention Policy](#).



ANTI-BRIBERY AND ANTI-CORRUPTION

We never use underhanded business tactics to get ahead.

At Casey's, providing top-notch service and a superior guest experience are how we get ahead — not through bribes or other unscrupulous business arrangements. We keep our business free of corruption by rejecting all improper payments and carefully monitoring all transactions.

How can I tell the difference between a gift and a bribe?

Consider value and intent. Acceptable gifts and business courtesies should be rare, modest in value, and tied to legitimate work tasks. Bribes, on the other hand, are usually greater in value and come with a “catch” (an implicit understanding that favorable business decisions or terms will be given in return). Bribery inevitably leads to corruption because it puts the self-interest of a few individuals above the best interest of our Company. That is why Casey's Team Members should never attempt to bribe a public official, solicit, or accept bribes. They should always speak up if they know of or suspect corrupt activity by others.

What can I do to prevent bribery and corruption?

Familiarize yourself with Casey's [Gifts and Entertainment guidelines](#) and know what is and is not allowed. And be sure to keep accurate books and records that clearly identify the purpose of all payments.



Good to Know!

It's not just cash; anything of value given to influence a business decision or gain a competitive advantage can constitute a bribe, including:

- Lavish or frequent gifts.
- Political and charitable contributions.
- A loan.
- Stocks, bonds, cryptocurrency, or other financial products.
- Special discounts that are not available to the public.

Questions? Contact Casey's Director of Ethics and Compliance and/or the Legal Department for guidance.

Anything else?

Yes. When it comes to bribery and corruption, we are not just accountable for our own actions. We are also responsible for bribes made on our behalf by others, so choose business partners carefully and monitor their work closely.



CONFLICTS OF INTEREST

As Team Members, we always do what is best for Casey's.

We all have activities, interests, and relationships outside of work. When they impact your ability to make fair, objective decisions on the job, they can create a conflict of interest. Even the appearance of a conflict is a problem because it can cause others to question your motives and your loyalty to Casey's.

How do you know if there is a conflict?

Sometimes it can be hard to decide if something is a conflict of interest. One of the best ways to avoid a conflict is to know the kinds of situations where they typically arise. Some examples include:

- Investing in a company that works with us.
- Working for one of our competitors or business partners.
- Serving as a board member or consultant for a competitor or business partner.
- Hiring or purchasing something for Casey's from a family member, relative, or close friend.
- Using Casey's property, without permission, for something other than Casey's business.
- Taking for yourself an opportunity that belongs to Casey's.
- Supervising a relative.
- Doing personal business during work hours.

Of course, it is impossible to list every potential conflict. If you are not sure about a particular situation, it is always best to check. And if you see or suspect a conflict of interest, even if it is only a potential conflict, discuss it with a leader, the Director of Ethics and Compliance, and/or the Legal Department, so the situation can be properly reviewed.



Good to Know!

Not sure if a situation you're facing presents a conflict? Ask yourself:

- 1 Could it interfere with my responsibilities at Casey's?
- 2 Could it impact the decisions I make for Casey's?
- 3 Would others (inside or outside of Casey's) think it's a conflict?

If the answer to any question is "yes" or "I'm not sure," stop and seek guidance by filling out the conflict-of-interest form to avoid even the appearance of anything improper.

What about related-party transactions?

A related-party transaction is generally defined as a transaction between Casey's and any director or director nominee, executive officer, anyone who holds more than 5% of Casey's common stock, and the immediate families of any of these individuals. There are restrictions in place regarding any proposed related-party transactions. If you are aware of any proposed or actual related-party transactions, you must inform Casey's Chief Legal Officer.

GIFTS AND ENTERTAINMENT

We won't let a gift send the wrong message.

An occasional gift from a business partner can be a normal part of building a good business relationship. However, if a gift is expensive, inappropriate, or offered too frequently, it can impact (or give others the idea that it's impacting) your objectivity. Don't let business decisions be influenced by gift-giving.

How can you be sure a gift is acceptable?

Report any gift offered or received to your leader. Your leader must then report the gift to the appropriate member of the Senior Leadership Team, who will determine if it's okay to accept the gift or if you should decline it.

Regardless of whether the gift is accepted or declined, report the gift and any relevant details to the Director of Ethics and Compliance and/or the Legal Department using the gifts and entertainment submission form.

What about giving gifts to others?

Don't offer a gift to a business partner without approval from your leader. We want to ensure that any gifts we give are a reasonable and customary part of doing business, too. Gifts should never be given to influence decisions about working with Casey's.



Food for Thought

To find out more, see our Gifts and Entertainment Process Document.



Good to Know!

A “gift” can take many forms, including:

- Vendor merchandise.
- Tickets to a sporting event or entertainment venue.
- A gift card.
- Gift baskets.
- Access to or use of a vacation property.
- Subsidized or free travel.

Report all gifts (offered, accepted, or given) to your leader — failing to do so is a violation of our Code.

What about meals and entertainment?

Business meals should always be reasonable whether hosted by Casey’s, Team Members, or third parties.

Excessive consumption of alcohol is never acceptable in any setting.

When Casey’s is hosting a dinner event, the most senior Casey’s Team Member attending must pay.

Questionable entertainment, such as “adult” entertainment, which may reflect negatively on Casey’s, is prohibited regardless of who may be hosting.



A Slice of Life

One of my suppliers sent me a very expensive gift basket over the holidays. It was sent to the office, and I didn’t have a chance to say, “No, thank you.” What should I do?

Since it wasn’t possible to decline the gift, accept it on behalf of Casey’s and report it to your leader, as required by our policy. The appropriate member of the Senior Leadership Team, consulting with the Director of Ethics and Compliance, will determine disposition.

SPEAKING FOR CASEY'S

We send one clear message.

Although we're all ambassadors for Casey's, it's important that only designated Team Members speak on Casey's behalf. They can make sure that information we share about Casey's is clear, consistent, and accurate and that we meet our legal and regulatory obligations.

What should you do?

If someone contacts you for information about Casey's, refer them to the right department.

Questions from reporters or the media?	Invitations to make speeches or participate in events?	Questions about legal matters?	Questions about financial matters?	Questions from the government?
				
Contact: The Communications Director	Contact: The Senior Leadership Team Member responsible for your functional area and the Communications Director	Contact: The Legal Department	Contact: The Chief Financial Officer or the Senior Vice President of Investor Relations and Business Development	Contact: The Legal Department

But what if you know the answer?

Even if you know the answer and want to be helpful, it's best to let the experts respond. One misstep, even if you meant well, can affect our reputation and our brand.

What about social media activity?

Social media is a great way to stay connected with family and friends, but be responsible when you're online:

- Remember, your posts may influence not only the way that people see you, but also the way they see Casey's. Certain policies, such as Casey's Discrimination and Harassment Policy, apply inside or outside work.
- Be clear that any opinions you post represent your own thoughts and views, not those of Casey's.
- Never share or disclose sensitive information.



MATERIAL NON-PUBLIC INFORMATION

We comply with insider-trading laws.

As Casey's Team Members, we may hear or see material information about Casey's or companies we work with that isn't known to the public. Using that information to buy or sell stock or securities, or telling others about it so they can do so ("tipping"), is unlawful insider trading. Those designated as "insiders" by Casey's are also prohibited from hedging and pledging Casey's stock.



How can you do your part?

Casey's is a publicly traded company and is listed on the Nasdaq. Anyone can become a shareholder by purchasing Casey's stock. If you have material non-public information, then trading based on that information gives you an advantage, creates an unfair playing field, and can lead to serious consequences.

Make sure:

- You know the kinds of information considered material, non-public information.
- You never trade based on material, non-public information.
- You never share material, non-public information with others, including relatives, friends, brokers, or members of the investment community.

Certain Team Members have additional trading restrictions. Check our Insider Trading Policy for more information.

What if you're not sure if information is inside information?

It's best to assume it is and seek guidance before proceeding. Talk to the Legal Department if you have any questions about the law or our policies or if you have questions about what you may communicate to others.

COMPETITION AND FAIR DEALING

We can be counted on to do business the right way.

Casey's is committed to beating the competition, not cheating them. We never let our desire to be the best justify dishonest or anticompetitive practices. True success comes by delivering our best with integrity.

What's the difference between healthy and unhealthy competition?

While there are many laws that regulate how we're allowed to compete and grow in the marketplace — and we are committed to following them all — healthy competition really boils down to simple honesty. Unfair or anticompetitive behavior almost always involves some form of deception, either of the competition or the guests whose business we compete over. However, Casey's follows all applicable United States antitrust laws; we promote our products and services honestly, reject all attempts to unlawfully limit competition, and always fact-find with integrity.

How does fair dealing help us compete?

Fair dealing means doing our work with transparency and never misleading people. When we treat our guests fairly, we foster loyalty and repeat business.

So how should I interact with competitors?

Always take care when speaking with competitors. Do not discuss competitively sensitive topics such as pricing or fixing prices, promotions, dividing up markets or territories, preventing other companies from entering the market, boycotts of other companies or suppliers, rigging bidding processes, or agreeing not to hire each other's employees. Remember that even a casual or "joking" conversation can be considered an anticompetitive "agreement."





Good to Know!

Knowing what others in our industry are doing helps keep us competitive. But as with any competitive activity, gathering information should always be done with honesty and fairness.

Ethical intelligence gathering looks like:

- Analyzing public financial statements and disclosures.
- Monitoring press statements, social media, and public marketing materials.
- Reviewing customer feedback.

Unethical intelligence gathering looks like:

- Using sensitive information obtained from hacking or data breaches.
- Misrepresenting yourself or your position to obtain information.
- Obtaining information through bribery, blackmail or other forms of coercion.
- Eavesdropping or spying on competitors.

How about our marketing and advertising?

We're open and honest, even when it's tough — that's part of being authentic, one of our Casey's CARES values. Tell the truth when talking about Casey's and our products. Never make claims that are untrue and never take unfair advantage of anyone.

Anything else?

Yes. Always make decisions based on what's best for our guests and Casey's, not based on favoritism or personal relationships, not on improper gifts and not on bribery. That's just not the way we do business.





Casey's Supports a Speak-up Culture

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RESOURCES TO HELP YOU

We rely on you to help keep Casey's a great place to work.














If you see or suspect that a Team Member or business partner has violated our Code, our policies, or the law, immediately report your concerns. The resources listed here are available to help you.

How to Report Concerns

Mailing Address:

Casey's General Stores, Inc.
 ATTN: _____
 One SE Convenience Blvd.
 Ankeny, IA 50021-8045

Be sure to call attention to the resource listed in the column most relevant to your concern.

	Casey's CARES Ethics Hotline available 24/7, via:  (844) 713-1132 or	Human Resources Department	Chief Executive Officer	Chief Legal Officer	Chairperson of the Audit Committee	Director of Ethics and Compliance	Lead Independent Director
	caseys.ethicspoint.com	HRsupport@caseys.com	CEO@caseys.com	CLO@caseys.com	CAC@caseys.com	CCO@caseys.com	LID@caseys.com
Harassment or discrimination							
Violations of our Code, policies, or the law that are not financial in nature							
Inappropriate conduct by the Audit Committee Chairperson or the Chief Executive Officer							
Violations of our Code, policies or the law that are financial in nature (accounting or auditing matters)							

HOW TO REPORT CONCERNS

We speak up when something isn't right.

You may submit your concern anonymously (through the [Casey's CARES Ethics Hotline](#) or in writing), but providing contact information (such as your phone number, email address, physical address, etc.) will allow us to follow up if needed and ask additional questions to help us properly investigate your report.

How does the Casey's CARES Ethics Hotline work?

The Hotline web portal and phone line are available 24 hours a day, seven days a week. When you contact the Hotline, trained specialists from an independent third-party provider of corporate compliance services will answer your call, document your concerns, and forward a written report to Casey's for further investigation.

What happens after you report a concern?

Regardless of whom you contact, your report will be promptly addressed and handled confidentially to the extent a thorough investigation will allow.

If you report your concern through the Hotline, you will receive an identification number so you can follow up on your concern. With this identification number, you can track the resolution of the case, but please note that out of respect for privacy, Casey's won't be able to inform you about individual disciplinary actions.

Team Members have a responsibility to cooperate in any review, evaluation, or investigation of reported violations.

What if I feel uncomfortable coming forward?

Speaking up is never easy, but it's always the right thing to do. We can't correct problems we don't know about. Ignoring bad behavior — or waiting for someone else to say something — can make a bad situation worse.



NO RETALIATION

Come forward without fear.

Casey's prohibits retaliation against anyone who:

- Makes a good-faith report about a known or suspected violation of our Code, our policies, or the law.
- Refuses to engage in unlawful conduct.
- Assists in the investigation of a reported violation.

If you experience or suspect retaliation, reach out to your leader or the [Casey's CARES Ethics Hotline](#) immediately. Casey's will investigate any reports of retaliation and take appropriate action.



Good to Know!

Sharing a concern in good faith means you have a reasonable, honest belief that there is a violation of our Code, our policies, or the law.



A Slice of Life

My leader has told me to do something that violates a Company policy. I know I should tell someone, but I'm afraid that if my leader finds out, they will make my job difficult for me. What should I do?

Don't engage in the conduct; speak up. The best place to raise your concerns would typically be with your leader, but since it is your leader's actions that concern you, contacting Casey's CARES Ethics Hotline is a good option. Reporting through the Hotline will give you the assurance of knowing that Casey's is looking into the situation and that retaliation by your leader or others will not be tolerated.





VIOLATIONS AND DISCIPLINARY ACTION

We take violations seriously.

We honor our values — they reflect who we are and what's important to us. That's why any Team Member who engages in conduct that disrespects our values by violating our Code, our policies, or the law — or encourages others to do so — may be subject to disciplinary action, including termination of employment, civil prosecution, and claims for damages or losses.

Nothing in our Code prohibits or restricts Casey's from disciplining or discharging Team Members who engage in misconduct, whether or not the misconduct is expressly covered by our Code.

UPDATES AND REVISIONS

Our Code may be updated and revised periodically. All substantive updates and revisions are subject to approval of the Board of Directors and will be promptly disclosed as required by law or stock exchange regulation and will be distributed promptly for Team Member review.

WAIVERS OF THE CODE

Any waiver of this Code for the Board of Directors, Casey's executive officers, and certain other financial officers may be made only by the Board or the applicable Board committee and will be promptly disclosed as required by law or stock exchange regulation.

