

DOLE FOOD COMPANY, INC.

GUIDELINES FOR PUBLIC DISCLOSURES AND COMMUNICATIONS WITH THE INVESTMENT COMMUNITY

In the course of your work at Dole Food Company, Inc. (the “Company”) you may come into possession of information about the Company that is significant, or “material,” and that is not known to the general public. It is against the Company’s policy for directors, officers or employees to disclose confidential information about the Company to anyone, except where disclosure is authorized or legally mandated. This policy is important not only in order to preserve Company confidences, but also to comply with federal securities laws designed to prevent “insider trading.”

It is also our policy not to make disclosures of material nonpublic information on a selective basis. This policy is important in order to comply with Regulation FD (Fair Disclosure), a rule under the federal securities laws that prohibits companies from disclosing material nonpublic information to shareholders where it is reasonable to expect that they will trade on the information, and to market professionals, without also disclosing the information to the public. Under Regulation FD, market professionals include analysts, institutional investors, investment advisers, institutional investment managers and investment companies. In these guidelines, we refer to these market professionals and to shareholders of the Company that are reasonably likely to trade on material nonpublic information collectively as the “Investment Community.”

Under Regulation FD, if information is disclosed selectively, the Company must make public disclosure of that information simultaneously in the case of an intentional disclosure or promptly in the case of an unintended disclosure. A disclosure is “intentional” when the person making the disclosure either knows, or is reckless in not knowing, that the information being communicated is both material and nonpublic.

To guard against the disclosure of material nonpublic information to the Investment Community, we have designated the following employees as Company “Spokespersons”: Chief Executive Officer, Chief Financial Officer, General Counsel, Treasurer and the head of corporate communications.

The Spokespersons are the only individuals authorized to disclose information about the Company to the Investment Community. Individuals who are not Spokespersons should refer any inquiries from the Investment Community about the Company to a Spokesperson.

To satisfy our responsibilities with respect to material nonpublic information, we have implemented these guidelines, which govern the confidentiality of Company information and the disclosure of material nonpublic information about the Company to the Investment Community. These guidelines will be reviewed, evaluated and revised by the Company from time to time in light of developments in the Company’s business and the Company’s experience in the marketplace.

I. Material Nonpublic Information

A. Disclosure of Information

Employees should not disclose material nonpublic information about the Company to persons outside the Company unless they are specifically authorized to do so.

If a question arises as to whether information is material or nonpublic, or whether an employee is authorized to disclose information, the General Counsel should be contacted prior to disclosure of the information. If the disclosure has already occurred, you should contact the General Counsel as soon as possible following the disclosure.

B. What is Material Nonpublic Information?

Information is generally considered material if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision to buy, hold or sell securities. Either positive or negative information may be material. Depending on the circumstances, common examples of information that may be material include:

- earnings, revenue or similar financial information;
- unexpected financial results;
- unpublished financial reports or projections;
- extraordinary borrowing or liquidity problems;
- changes in control;
- changes in directors, senior management or auditors;
- information about current, proposed or contemplated transactions, business plans, financial restructurings, acquisition targets or significant expansions or contractions of operations;
- changes in dividend policies or the declaration of a stock split or the proposed or contemplated issuance, redemption or repurchase of securities;
- material defaults under agreements or actions by creditors, clients or suppliers relating to a company's credit rating;
- information about major contracts;
- significant new product developments or innovations;
- the interruption of production or other aspects of a company's business as a result of an accident, fire, natural disaster or breakdown of labor negotiations;

- major environmental incidents; and
- institution of, or developments in, major litigation, investigations or regulatory actions or proceedings.

Nonpublic information is information that is not generally known or available to the public. We consider information to be available to the public only when it has been released to the public by the Company through appropriate channels (e.g., by means of a press release, a widely disseminated statement from a senior officer, or a public filing with the SEC).

Discussing previously disclosed historical information about the Company or facts that are generally known to the public would not be considered a prohibited selective disclosure. However, commenting on or updating previously disclosed information may in certain circumstances constitute disclosure of material nonpublic information.

II. Statement Preparation

Spokespersons should consult with the General Counsel, or one of the Assistant Secretaries of the Company, when preparing press releases or other official statements to the Investment Community and regarding the inclusion of legal disclaimers and other appropriate cautionary language in press releases and other official Company statements.

III. Procedures for Making Public Statements

A. Widespread Dissemination

Company press releases must be provided simultaneously to the major wire services, financial news services and newspapers in markets having a significant relationship to the Company. The General Counsel, or one of the Assistant Secretaries of the Company, will need to determine, prior to issuance of the release, whether to furnish or to file a Form 8-K with the Securities and Exchange Commission (the “SEC”). Where appropriate, a press release may be followed by a conference call. In such cases, a replay of the conference call generally will be made available up to 30 days after the call after which it will be moved to a website location that is identified as “historical information.” The public will be given adequate notice concerning the conference call, including date, time and access information both for the live call and the replay. Notice of the call will be included in the press release or in a subsequent press release disseminated a reasonable time before the call.

B. Exchange Notification

The Company will notify the New York Stock Exchange (the “NYSE”), by telephone, of its intention to release any news or information which might reasonably be expected to materially affect the market for its securities through a Regulation FD-compliant method (or combination of methods) at least ten minutes prior to the release. The Company will notify the NYSE of the substance of the public disclosure, the Regulation FD-compliant method it intends to use to make the disclosure, and the information necessary for the NYSE to locate the

disclosure upon publication. If the disclosure is made in written form, the Company also will provide to the NYSE the text of the disclosure by email at least ten minutes prior to its release.

Furthermore, the Company will promptly send to its NYSE representative by email a copy of any press release or other public disclosure made using any Regulation FD compliant method that may significantly affect trading. The Company Treasurer, working with the head of corporate communications, will coordinate the process for these notifications

C. Earnings Releases

The Company will issue its earnings releases prior to the opening or after the closing of trading on the NYSE, and will coordinate their timing with the Company's quarterly filings with the SEC. The General Counsel, or one of the Assistant Secretaries of the Company, will review all earnings releases (together with any scripts to be used in connection with any related conference calls). This information will be released in accordance with the procedures in Sections III.A and III.B above. Within the next 48 hours or as soon as practicable thereafter, the Company may hold an earnings conference call. If the Company holds such a call, the call will be made available to investors and the media either telephonically and/or by webcast. In such cases, a replay of the conference call generally will be made available up to 30 days after the call, after which it and/or a transcript thereof will be moved to a website location that is identified as "historical information." The public will be given adequate notice concerning the conference call, including date, time and access information both for the live call and the replay. Notice of the call will be disseminated by press release a reasonable time before the call.

Pursuant to Item 2.02 of Form 8-K, the Company will furnish to the SEC a Form 8-K with the earnings release within four business days of the public announcement, but prior to any earnings conference call. The public release of additional information about a completed fiscal year or quarter may trigger an additional Form 8-K filing.

IV. Communications with the Investment Community

A. General Policy

In the event that a Company director, officer or employee inadvertently discloses information that may be material and nonpublic, the General Counsel should be notified immediately. If there is any question as to whether information is material or nonpublic, the General Counsel, or one of the Assistant Secretaries of the Company, should be consulted. In assessing whether information disclosed was material and nonpublic, Company will consider the standards articulated in Section I.B. above ("What is Material Nonpublic Information?").

If it is determined that material nonpublic information was disclosed inadvertently, the Company will make prompt public disclosure of the information by issuing a press release or furnishing or filing a Form 8-K with the SEC, or through some other method of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

From time to time, Spokespersons will meet following communications with the Investment Community to discuss those communications, with particular regard to the types of questions raised during the communications and whether these questions possibly solicited material nonpublic information.

B. Quiet Period

- Where results have not yet been publically disclosed.
Spokespersons will not disclose any information about the Company's financial or operating results for any period as to which the Company has not yet publicly disclosed its earnings.
- Where results have been publically disclosed.
As to the results for periods as to which the Company has already publically disclosed its earnings, Spokespersons will not discuss those results during the approximately 15-day period prior to issuance of the next quarterly earnings release by the Company and the approximately 30-day period prior to issuance of the next annual earnings release, unless determined otherwise by the Company.

C. One-on-One and Small-Group Meetings and Telephone Calls

In advance of any scheduled one-on-one or small-group meetings and telephone calls with the Investment Community, it may be appropriate for Spokespersons to request an agenda and/or a list of questions. In the case of unanticipated questions, a Spokesperson should feel free to decline to answer and to contact the person asking the question after it has been determined whether responding to the question would involve the disclosure of material nonpublic information. Similarly, if, during the course of a one-on-one call, a Spokesperson is asked, or it becomes apparent to the Spokesperson that he or she will be asked, one or more questions that may solicit material nonpublic information, the Spokesperson should decline to respond.

When participating in one-on-one or small-group meetings and telephone calls with the Investment Community, Spokespersons will decline to answer questions about:

- internal financial projections; and
- litigation matters, except and only to the extent otherwise disclosed publically.

D. Documentation of Communications

The Treasurer and the head of corporate communications will coordinate to maintain a file of all written statements, releases or filings made by the Company that contain material information about the Company. The file should include SEC filings, press releases, Company statements, shareholder communications, analyst reports, and newspaper and magazine articles.

With any communication with the Investment Community that may involve significant information, either by telephone or in person, a Spokesperson should prepare a log entry or file memorandum detailing the time, place and nature of the communication, together with a summary of the information discussed. Each change or entry to a Spokesperson's log should

also be immediately provided to the Treasurer. All log entries and file memoranda should be included in the file of Company communications.

E. Previously Disclosed Historical or Factual Information

In general, a Spokesperson may refer the Investment Community to previously disclosed historical information about the Company or to facts that are generally known, although Spokespersons should be aware there may be circumstances in which commenting on previously disclosed historical or factual information would constitute a disclosure of material nonpublic information. Where a Spokesperson furnishes or refers to historical information, that information will be accompanied by a written statement in substantially the following form:

“This information is being provided as historical information. In providing such historical information, the Company is not undertaking any duty to update the information. The Company has not reviewed the information to determine whether it remains accurate, and the information may have been superseded.”

F. Responding to Questions and Commenting on Information

Spokespersons should err on the side of caution and decline to comment on statements and respond to questions if it appears that doing so may involve a discussion of material nonpublic information.

Comments on certain types of information about the Company will be made only in accordance with the following guidelines:

Market rumors. The Company will not comment on market rumors.

Analyst reports or projections. The Company will not assist in the preparation of, nor will it comment on, analyst projections regarding the Company, except that previously disclosed historical information may be provided as described above. Spokespersons may point out mistakes regarding previously disclosed historical information about the Company that are part of a draft or proposed analyst financial report or projection. When they make those corrections, Spokespersons will do so in writing, stating that the Company has corrected only historical factual errors, but does not approve, adopt or endorse the report or projection. If a projection is incorrectly attributed to Company sources, a Spokesperson will take steps to deny publicly Company responsibility for the information, and reaffirm that the Company does not comment on any projection.

G. Analyst, Investor and Industry Conferences

Any material nonpublic information that the Company intends to disclose will be released prior to or simultaneous with the occurrence of the conference.

Questions about these guidelines should be directed to the Company’s General Counsel at (818) 879-6810.