

INTEGRITY IS OUR KEY INGREDIENT

CODE OF ETHICS

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MESSAGE FROM THE CEO



*Steve Oakland
Chief Executive Officer and President
TreeHouse Foods*

It is my pleasure to share with you TreeHouse's Code of Ethics. At TreeHouse, *Integrity is Our Key Ingredient* and we apply it to everything we do. Our business is a unique one, where our customers trust us with their brands and their consumers — each and every day. The privilege to leverage the strong brand reputation of our customers throughout our business comes with an enormous responsibility to be our best selves every step of the way.

We created this Code, together with our Values, to serve as your guide to acting with integrity. We can apply this Code, alongside our Values, to almost everything we do, from how we treat one another to how we make business decisions to how we keep each other and our food safe.

Read this Code, use it as a resource as you go through your day, and if you ever have questions or concerns about how to proceed or about something you see that does not seem right, speak up.

Thank you for your time and commitment to this Code, to one another, and to our Company.

Sincerely,

Steve Oakland
Chief Executive Officer and President



“ We created this Code, together with our Values, to serve as your guide to acting with integrity. ”



OWN IT



COMMIT TO
EXCELLENCE



BE AGILE



SPEAK UP



BETTER
TOGETHER





INTRODUCTION

PURPOSE OF THE CODE

At TreeHouse Foods, Inc. and its subsidiaries (collectively “TreeHouse” or “Company”), our customers rely on us to be a trusted and responsible business partner and our employees count on us to create an environment that is safe, respectful of them as individuals and provides long-term opportunities. We create this trust every day by conducting business the right way all the time, with integrity as our key ingredient.

We developed this Code of Ethics (“Code”) to serve as a framework for our ethical business practices. It provides us with high-level guidance and direction about difficult choices we might face. Our policies and procedures, which we reference throughout this Code, provide additional details in certain areas and are incorporated into this Code.

The Code reflects and supports The TreeHouse Way, the set of Values that describes how we work with one another and our external stakeholders. In the spirit of *Own It*, sections of the Code ask you to take key actions and responsibilities to heart. As described below, we want you to *Speak Up* when necessary. These and other Values are called out throughout the Code to reinforce how they guide our responsibility to do the right thing.

SPEAK UP

Our Values encourage us to Speak Up. Our culture at TreeHouse must be one where we all feel comfortable speaking up if we have questions or concerns about misconduct or potential misconduct. Reporting concerns is a responsibility and a requirement. It can be hard to speak up when something does not feel right, but our Company can only address concerns and resolve issues when we know about them. The sooner you can raise a concern or make a report, the sooner TreeHouse can work to begin making things better.

There are many resources available to you at TreeHouse. If you have a question or a concern, contact any one of the following, whom we will refer to as your Ethics Resources:

- Your Supervisor
- Your Plant Manager
- Your Human Resources Representative
- The Chief Human Resources Officer
- The General Counsel
- Chief Compliance Officer
- Any member of the Law Department
- The General Auditor
- Our TreeHouse Hotline

If you would like to raise a potential issue anonymously — including concerns about retaliation, quality, health, or safety — you can also contact the Hotline, 24 hours per day, seven days per week at 1-800-763-0781.

After an individual raises a concern, the appropriate resources at TreeHouse will determine how to proceed with an investigation. Those resources will work to keep all information reported confidential, to the extent permitted by the law and without compromising a thorough and effective investigation.

We are all responsible for our culture. Although uncomfortable, we must bring forward issues that violate our Code.



APPLICATION OF THE CODE

This Code applies to all employees, officers and directors of TreeHouse. We expect everyone who works on our behalf, including our suppliers and business partners, to act with integrity and in accordance with the principles we outline in this Code. Those of us who supervise employees have an additional responsibility to communicate the importance of this Code to those around us.

TreeHouse takes compliance with the law and this Code very seriously. Violations will be subject to strict discipline.

RETALIATION IS PROHIBITED

We have a zero-tolerance policy for retaliation at TreeHouse. Individuals who report concerns in good faith should never face mistreatment. If you feel that you are being treated differently because of a concern you raise or a question you asked, you must share this with your Ethics Resources immediately.

INTEGRITY REQUIRES US TO PRIORITIZE FOOD SAFETY AND A SAFE WORKPLACE

DELIVERING SAFE & QUALITY FOODS

The safety and quality of our food is critical. TreeHouse follows “good manufacturing practices (GMP)” throughout all of our operations. Those of us who work in formulation, production, storage or transportation of our food must prioritize safety, use the highest level of care and *Commit to Excellence* at all times.

OWN IT:

- Always follow all plant rules.
- Report any concerns about unsafe foods or conditions immediately.
- Comply with all policies, documenting all product tests and inspections in accordance with these policies.



Breaking It Down ...

Some things we do at TreeHouse to prioritize safe manufacturing practices include:

- Maintaining and following strict hygiene policies
- Keeping good records
- Using safe and inspected equipment
- Establishing processes and procedures to manage and address concerns and complaints



Integrity Means ...

The policies and controls at TreeHouse are in place for a very important reason — to keep our food safe. We never take shortcuts or work around controls as this could jeopardize the safety of our products.



ENSURING A SAFE WORKPLACE

Nothing is more important to our Company than operating a safe workplace. At TreeHouse, we all play a role in keeping our surroundings safe and secure. This includes complying with all safety policies and procedures, as well as maintaining a workplace that is free from drugs, violence and weapons.

OWN IT:

- Follow all safety precautions that apply to your job, and report any safety issue immediately.
- Follow security policies and procedures at your location.
- Never be impaired by any substance, such as drugs or alcohol, while at work.
- Never act in a way that could be perceived as violent or threatening.
- Know that weapons and firearms are not permitted on Company property.
- Regularly review our Drug and Alcohol-Free Workplace Policy – All Salaried and Hourly Employees and our Workplace Violence Prevention Policy – All Salaried and Hourly Employees on the myTreeHouse website.



*Breaking
It Down ...*

Given the nature of our business, some of us have jobs that require us to follow specific procedures and protocols to keep safe. Those of us working in plants must always:

- Wear appropriate protection
- Follow all policies and procedures that apply to the use and disposal of hazardous materials
- Complete all safety training that is designated for our roles
- Immediately report any safety issues



*Integrity
Means ...*

Given the world we live in, we need to be prepared to respond to safety concerns even though we never anticipate or expect violence to occur at our Company. It is important to speak up if we are worried that a coworker is acting out of the ordinary, even if doing so feels uncomfortable. Protecting one another is our ultimate responsibility.

INTEGRITY FUELS HOW WE TREAT ONE ANOTHER

DEMONSTRATING MUTUAL RESPECT

At TreeHouse, we strive to be *Better Together*. We work better together when we create an environment that is grounded in mutual respect. Our Company empowers us to treat one another professionally and respectfully and prohibits harassment in all forms.

OWN IT:

- Be courteous and considerate when working with coworkers, customers, suppliers or anyone else.
- Think about how your words and actions are perceived and avoid any conversations that could be considered inappropriate.
- Speak up if you feel as though you have been mistreated or if you have concerns that someone around you is being mistreated.



*Breaking
It Down ...*

Harassment can ... be sexual in nature, but it does not have to be.

Harassment can ... happen through words alone (like telling inappropriate jokes or repeatedly asking someone on a date) or by sending someone

inappropriate emails or pictures. It can also involve unwanted touching or physical contact.

Harassment can ... include bullying and intimidation.

Harassment can ... start as something small or seemingly insignificant, but can quickly escalate into something bigger.

Harassment can ... impact everyone. It can happen regardless of gender, age, race or any other characteristic that makes us unique.



*Integrity
Means ...*

Remember that if someone is being mistreated, it is inappropriate not to do something. If you have concerns that someone is being harassed, do the right thing. You can and should speak up against the behavior or report the behavior to an Ethics Resource. Just remember that your voice is critical.

PROMOTING DIVERSITY, EQUITY & INCLUSION

At TreeHouse, we set each other up for success when we value and respect the expertise, contributions and ideas of others, especially when their backgrounds and experiences differ from our own. Our work environment is an inclusive one—one that thrives on a diverse team with common goals.

OWN IT:

- Keep an open mind to perspectives that might be different from your own.
- Take steps to foster our strong and diverse team, by encouraging those around you to share their thoughts and ideas.
- Make employment-based decisions, such as whether to hire or promote someone, based on their skills, capabilities and experiences and never based on characteristics protected by the law, including antidiscrimination laws.
- Regularly review our Equal Opportunity and Anti-Harassment Policy – All Employees and our Diversity, Equity and Inclusion Policy on the myTreeHouse website.



Breaking It Down ...

There are many laws around the world that prohibit discrimination. These laws protect individuals from being treated differently based on unique characteristics. Examples of unique characteristics include, but are not limited to:

- Sex
- Age
- Sexual orientation
- Gender identity
- National origin or ancestry
- Marital status
- Disability
- Race
- Religion



Integrity Means ...

Keep in mind that creating an inclusive culture goes beyond avoiding discrimination. It requires us to proactively support and encourage one another in a way that enables each of us to feel comfortable contributing our best ideas every day.

PROTECTING DATA PRIVACY

During the course of our work, we may collect, store, share and process personal data about our employees, as well as other people who engage with TreeHouse. We must keep personal data safe and protect the privacy rights of all individuals whose personal data we access and store. At TreeHouse, we comply with applicable laws that regulate the collection, storage and use of personal data wherever we do business.

OWN IT:

- Do not share personally identifiable information (PII) unless you have written permission to do so.
- Do not send PII via email unless you have followed the Company's encryption procedures.
- Collect and store PII only if you need to do so in order to complete your work.



Breaking It Down ...

PII includes information that can help identify an individual. For example, something as straightforward as an individual's name is personal information. PII can also include data about a person such as their employment history, social security number, age, race, phone number and email address.



Integrity Means ...

Our customers trust us to represent their brand. Data breaches can destroy our brand reputation resulting in damage to our business relationships. By taking our responsibility to protect personal information seriously, we maintain the trust of our customers.



VALUING SOCIAL RESPONSIBILITY

Part of our commitment to integrity includes a pledge to take care of our surroundings, from our environment to the communities and people who depend upon us. At TreeHouse, we comply with all environmental regulations that apply to us and do everything possible to conduct our business in a sustainable way. We pride ourselves on a commitment to human rights and fair employment practices and choose to work with business partners who uphold these same principles.

OWN IT:

- Understand environmental regulations that apply to your work for TreeHouse.
- Do what you can to reduce waste in your day-to-day activities and by regularly reviewing our practices for efficiency.
- Demonstrate respect for human rights and speak up if you ever feel that a person or group of people is subjected to mistreatment.



Breaking It Down ...

As a trusted food manufacturer, we are proud of our commitment to treating everyone who works on our behalf lawfully and respectfully. In addition to prohibiting harassment and discrimination, we forbid all unfair labor practices. Here are some examples of

behaviors that we will never tolerate at TreeHouse or from any company or individual who works on our behalf:

- Using child labor
- Prohibited employment practices
- Human trafficking



Integrity Means ...

We consistently hold ourselves to the high standards of our customers, from the products we manufacture to the service we provide. We understand that doing the right thing is essential to our reputation. We must expect this same level of commitment from the suppliers we use and choose only to work with those who demonstrate a commitment to ethics and integrity.

INTEGRITY DRIVES US TO CONDUCT BUSINESS FAIRLY

WORKING WITH THE GOVERNMENT

When we enter into contracts or do business with the government, there are often specific requirements with which we must comply. Those of us who work on government contracts must understand and comply with the rules that apply to the work we do.

OWN IT:

- Never conceal information from the government, make false statements or create false records.
- Comply with the specific government contracting policies and procedures that apply to your role.



Breaking It Down ...

There are many special rules that apply when working on government contracts, especially in the areas of:

- The exchange of gifts and entertainment
- How we solicit and accept bids
- How we enter into agreements with subcontractors
- How we manage our records and respond to requests for information

If your work involves government contracts, it's important that you understand these rules.



Integrity Means ...

Just as we comply with all rules that relate to government contracting, we need to understand that anyone who works on our behalf, including agents or other third parties, must also comply with these rules. Choosing to work with individuals or companies who hold themselves to our high standards is imperative to our work with the government.

COMPETING FAIRLY

At TreeHouse, we strive to compete fairly and transparently. There are laws around the world that protect our customers from unfair competition. Understanding and complying with competition laws, such as the U.S. antitrust laws, is essential to our continued success as a trusted business partner.

OWN IT:

- Never make agreements or discuss or share sensitive information with competitors without prior written approval from the Law Department.
- Treat customers fairly and do not discriminate among customers through offers of price or other terms, or force a customer to buy one product in order to get another product.
- Be careful at trade association meetings to avoid pricing conversation or discussion that relates in any way to nonpublic business information.



Breaking It Down ...

Here are some examples of sensitive topics which you must not discuss with competitors:

- Customer prices, bids or bidding practices
- Costs, production levels, selling strategies, terms or conditions of sale
- Market shares
- Customer lists

Here are some examples of prohibited agreements with competitors:

- Agreements regarding pricing, pricing practices, bids, bidding practices, terms of sale or marketing practices
- Agreements to coordinate or allocate bids
- Agreements to divide customers, markets or territories with a competitor
- Agreements not to deal with another company

- Agreements which attempt to control a customer's resale price

Remember that a prohibited agreement with a competitor or customer does not have to be a written contract or even involve an express commitment. A “nod and wink,” an unspoken “understanding” or even silence may be enough to be considered a prohibited agreement.



Integrity Means ...

We have an obligation to protect competitive intelligence. We never misrepresent ourselves and use only ethical means to attain information about our competitors. If we become aware of information about our competitors that has not been made public or was not intended for us, we are all responsible for reporting it to an Ethics Resource immediately.



AVOIDING BRIBERY & CORRUPTION

At TreeHouse, we do not tolerate bribery in our operations at any place or at any time. There are many laws around the world which prohibit bribery and corruption. We comply with all of these laws. We hold third parties who work on our behalf to these same standards.

OWN IT:

- Do not offer anything of value to try to elicit a favorable business action.
- Never try to hide or conceal a payment.
- Record all payments and transactions correctly, truthfully and in accordance with policies and procedures.
- Oversee the work of third parties carefully, taking care to make sure that those who work on our behalf uphold our ethical standards.
- Comply with specific rules when working with government officials or employees.



Breaking It Down ...

A bribe happens when someone gives or promises another person something of value in return for favorable treatment. Bribes can include more than cash.

Some examples of bribes:

- Offers of discounts or refunds
- Offers to provide future job references
- Offers to make charitable contributions
- Offers to use vacation homes or personal property



Integrity Means ...

We choose our business partners wisely, working with third parties who abide by our standards and principles. If we have concerns about those who work on our behalf, we need to speak up. Watch for these red flags:

- Not complying with our policies
- Operating without permits
- Unwillingness to attest to our Code of Ethics or comply with our anti-corruption requirements
- Unusual payment or accounting terms or arrangements
- Over-invoicing or inaccurate invoices

GIVING & RECEIVING GIFTS & ENTERTAINMENT

In business, exchanging gifts or participating in business-related entertainment can be appropriate, particularly when it contributes to developing working relationships. However, we must act reasonably, use common sense and comply with all related policies and procedures.

OWN IT:

- Never offer or accept any form of gift or entertainment if it is meant to gain an unfair business advantage.
- If you offer to provide or accept business entertainment, make sure it has a legitimate business interest and complies with our Travel and Entertainment Expenses Policy.
- Offer or accept gifts only if they are nominal in value, given infrequently and are consistent with accepted customs and practices.
- Do not offer or accept cash or cash equivalents (such as gift cards or gift certificates).
- Pay close attention to specific rules that apply when working with government contractors or public officials.



Breaking It Down ...

During the course of your work for TreeHouse, you must not offer anything of value to government personnel without consulting the Law

Department. This includes any items, service, entertainment, meal, gift or transportation, regardless of value.



Integrity Means ...

Our decision-making at work must always be fair and impartial. Be careful to avoid even the appearance that you have given or received preferential treatment in a business relationship. Protecting our reputation as an ethical business also requires us to avoid any gifts or entertainment that could be viewed in a negative light.

COMPLYING WITH TRADE CONTROLS

At TreeHouse, we are responsible for complying with all laws that impact international trade, including anti-boycott laws, economic sanctions and export controls. Those of us who work with international operations or with purchasing or sales with a foreign country must understand and comply with the specific rules that apply to the work we do.

OWN IT:

- Contact the Law Department if you are asked to participate in a boycott.
- Do not engage in any commercial or financial transactions with persons, companies, entities or countries subject to economic sanctions.
- Never export controlled goods, services, software, technology or technical data to prohibited countries or end users or for prohibited end users.
- Do not act in a way that might directly or indirectly facilitate prohibited sales, exports or transactions by foreign companies.



Breaking It Down ...

U.S. anti-boycott laws prohibit us from participating in any illegal boycotts, but boycott requests are not always clear. Look closely at terms and conditions in letters of credit, purchase orders, contracts and questionnaires issued from entities located in boycotted countries. Keep in mind that they may not use the word “boycott.” So it’s important to contact the Law Department if you are unsure.



Integrity Means ...

The U.S. government has sanctioned certain countries and individuals, and we cannot do business with these entities. Before we engage with customers, we must take reasonable steps to identify and screen the ultimate end users for our products against the relevant sanctioned country and denied-party lists.

INTEGRITY MAKES US A TRUSTED BUSINESS PARTNER

DEMONSTRATING TRANSPARENCY IN OUR REPORTS AND RECORDS

The law requires us to report our financial results and other information about the Company in an accurate and timely manner and manage our records responsibly. We comply with all reporting and record requirements and have appropriate controls, policies and procedures in place.

OWN IT:

- Follow our policies for accounting, financial reporting and record retention.
- Enter all expenses and costs truthfully and accurately.
- Cooperate with internal and external auditors.
- Report any mistakes or concerns regarding financial entries immediately.
- Keep or discard all records in accordance with the Company's Records Management Policy.
- Be sure to pay attention if you receive specific instructions from the Law Department regarding records that could relate to legal proceedings or investigations.



Breaking It Down ...

We never expect fraud to happen at TreeHouse, but we need to understand how to recognize it and help stop it if it does occur. Fraud happens when someone tries to hide or misstate something in order to personally benefit or in order to attain an unjust benefit for someone else or even for the Company.

Here are some examples of fraud:

- Expenses that appear to relate to personal activities instead of business-related activities
- Financial results that do not seem to align with how the business is doing
- Transactions that seem unclear

- Requests to skip or work around ordinary review and approval procedures

If you have concerns about fraud or something about an expense report or transaction does not feel right, contact the Law Department immediately.



Integrity Means ...

When we show transparency in all of our financial reporting and disclosures, we do more than just comply with the law; we also show ourselves as responsible business partners, worthy of the trust of our shareholders and the public at large.

PREVENTING INSIDER TRADING

At TreeHouse, we comply with all laws that prohibit insider trading. It is against the law to buy or sell securities based on inside information. It is also against the law and Company policy to share information or provide a “tip” to another person who may trade on that information.

OWN IT:

- Never trade stock based on material, nonpublic information, whether that information relates to TreeHouse or to any one of our customers, suppliers or business partners.
- Never provide information to another individual so that he or she can make a trade based on that information.
- Safeguard all confidential information that may be considered inside information.



Breaking It Down ...

Material, nonpublic information includes information that, if made public, would be likely to have an impact on a company's stock price. Material, nonpublic information can relate to almost any aspect of a company's business, including:

- The company's finances
- Marketing or product strategies
- Changes in senior management



Integrity Means ...

While you work for TreeHouse, you may learn information about a customer or business partner that could impact the stock price. If this information could impact stock price and it is not yet publicly available, this is inside information.

You are never allowed to trade on inside information, nor are you allowed to share inside information with someone else or “tip” someone so that person can make a trade.

AVOIDING CONFLICTS OF INTEREST

Conflicts of interest happen when personal considerations or relationships conflict with or appear to conflict with the Company's business priorities and responsibilities. At TreeHouse, we need to make decisions that are in the best interest of the Company—decisions that are not compromised by the potential for personal gain.

OWN IT:

- Do not work with TreeHouse competitors or suppliers outside of your work for TreeHouse.
- Never participate in an activity that could have a negative impact on the Company's reputation.
- Refrain from using Company resources for personal benefit.
- Disclose any conflict or potential conflict to your supervisor or the Law Department immediately.



Breaking It Down ...

Many relationships can create a conflict or the appearance of one, including:

companies who do business — or hope to do business — with TreeHouse.

- **Relationships with relatives or close personal friends:** You cannot manage, hire or interview a relative or close personal friend.

- **Outside employment:** You cannot work for a competitor, industry consultant or supplier or take a job that interferes with your ability to complete your work for TreeHouse.

- **Financial investments:** You cannot do business with any people or



Integrity Means ...

While we should always try to avoid even the appearance of a conflict, it is possible that conflicts will arise for you. If this happens, disclose the situation to your supervisor or the Law Department. Often, it is possible to work with the Company to address and resolve the situation. Handling conflicts correctly is critically important to preserving our reputation as an ethical business.

PARTICIPATING IN POLITICAL ACTIVITIES

Although TreeHouse supports the individual participation of our employees in the political process on their personal time, our Company does not support political parties or candidates for public office nor do we reimburse employees for political contributions.

OWN IT:

- Keep your personal political activities separate from the work you do for TreeHouse.
- Make it clear that your beliefs are your own and not those of the Company.
- Do not use Company time, facilities or any other resources to support personal political interests.



Breaking It Down ...

If making contacts with political parties, organizations, candidates or government officials is part of the work we do for TreeHouse, we must always comply with all applicable laws and rules and seek guidance from the Law Department if we have questions.

For example, lobbying can be an appropriate business activity in certain types of work. At TreeHouse, we may never attempt to influence a member of the government to make a decision in favor of our Company. This includes lobbying government agencies for contract awards using any appropriated funds received from the government.



Integrity Means ...

We need to remember that the rules that apply to our Company's participation in the political process matter everywhere we do business. Even if laws vary per country, we need to seek guidance and approval from our supervisor or the Law Department before acting on the Company's behalf.

PROTECTING CONFIDENTIAL AND PROPRIETARY INFORMATION AND INTELLECTUAL PROPERTY

Our ability to grow and sustain our business depends in large part on confidential information about our strategies and processes. We must protect our confidential information, as well as the confidential information about our customers and business partners.

OWN IT:

- Protect confidential information at all times and share this information with other TreeHouse employees only if they need the information to do their job.
- Share confidential information about TreeHouse outside of the Company only if an approved Nondisclosure Agreement is in place.
- Follow policies to safeguard our intellectual property and contact the Law Department if you are unsure about whether something might be intellectual property.
- Keep in mind that your responsibility to safeguard the confidential information that you learn about while working at TreeHouse continues even if you no longer work for the Company.



Breaking It Down ...

Confidential information is any information of a confidential, proprietary or secret nature related to our business. Here are some examples:

- Confidential business processes, practices or results of operations
- Trade secrets, formulas, manufacturing techniques, research and development information, business plans or forecasts (including plans with respect to proposed acquisitions of other companies or their assets)
- Customer lists or other sales data
- Personnel information
- Marketing plans
- Pending or threatened litigation or claims against our Company



Integrity Means ...

We must always protect the trade secrets and other proprietary information of companies with which we do business. If we ever receive confidential information that is not intended for us, we need to immediately return the information and tell an Ethics Resource immediately.

SAFEGUARDING OUR PHYSICAL ASSETS, FINANCIAL ASSETS AND TECHNOLOGY SYSTEMS

We are all responsible for safeguarding our physical assets, our financial assets and our technology systems. At TreeHouse, we treat all Company assets with care.

OWN IT:

- Be responsible when incurring expenses on behalf of the Company.
- Take good care of all TreeHouse property, from office space to Company vehicles to manufacturing equipment.
- Use the Company's productivity tools, business systems and communication devices responsibly and in accordance with Company policies.



Breaking It Down ...

There are many things we can do to make sure we keep our technology systems safe. For example:

- Always use safe passwords that comply with Company requirements.
- Never store information about TreeHouse on computers or mobile devices that have not been approved by the Company.
- Keep mobile devices locked and safe at all times.



Integrity Means ...

We are all responsible for using Company assets for business purposes and not for personal benefit, including office space, Company funds and Company-issued devices.

Although we should primarily use these for business purposes, there may be times when you have to make a brief personal phone call or respond to a personal email. Use common sense in this case. Do not let your use interfere with your job responsibilities and never use systems to exchange inappropriate material or engage in inappropriate or unlawful discussions.

COMMUNICATING CAREFULLY

Our communications should always reflect a commitment to preserve our customer's brand reputation. At TreeHouse, we make sure our communications with the public and all of our stakeholders are consistent, truthful and accurate. We protect confidential information about TreeHouse and do everything possible to communicate in a way that reflects positively on us and our Company.

OWN IT:

- Only speak publicly about TreeHouse if you are specifically authorized to do so as part of your job.
- Always protect confidential information about the Company.
- Use common sense when posting on social media, both in your personal life and if you are using social media as part of your work for TreeHouse.
- If a securities analyst, media representative or someone else from outside the Company contacts you looking for information about TreeHouse, contact the Law Department.
- Regularly review our Social Media Policy on the myTreeHouse website.



Integrity Means ...

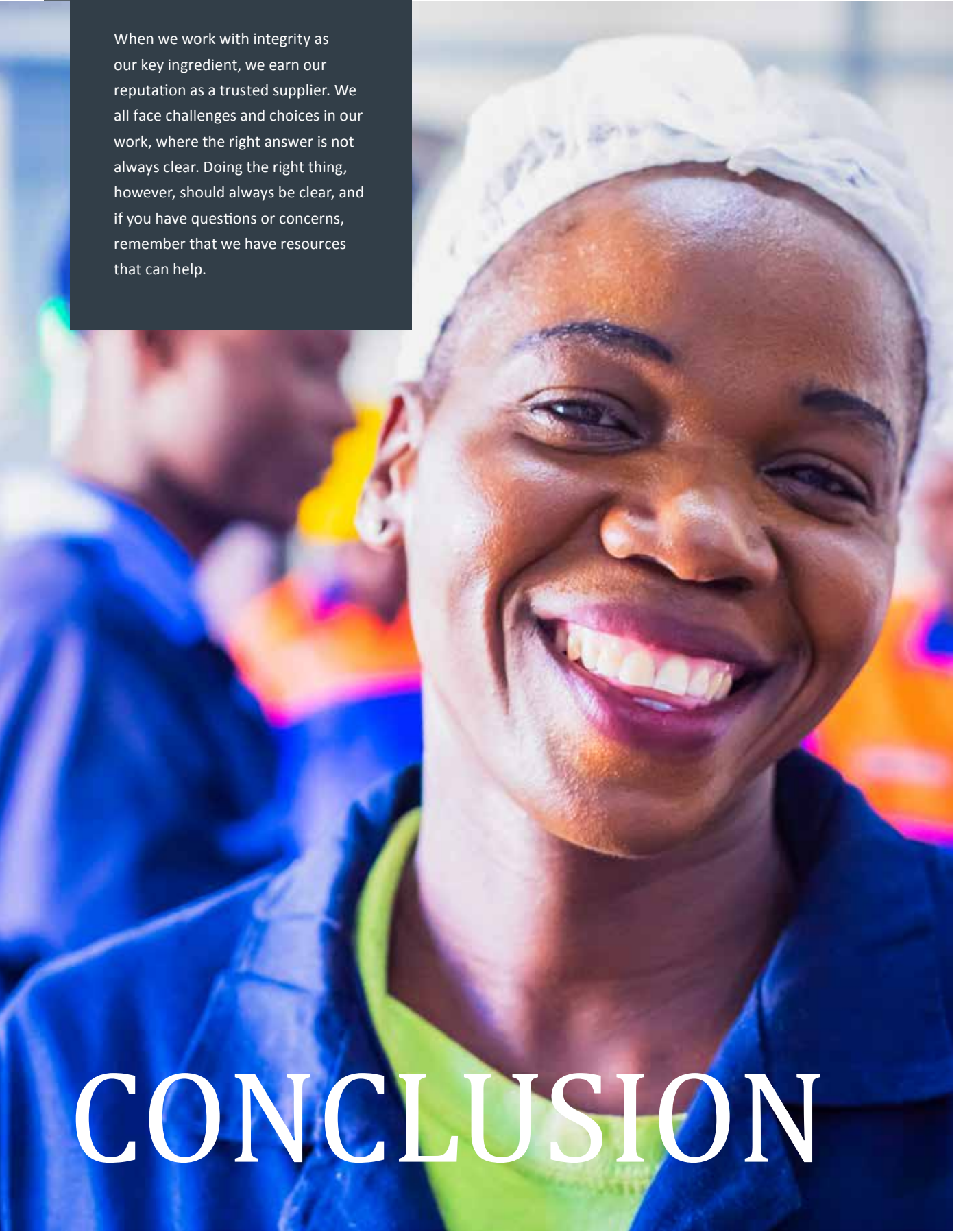
Our communications are a true reflection of our Company and our customers rely on what we say when they choose us to represent their brands. Communicating consistently, professionally and appropriately contributes to our image as a leader in the industry.



Breaking It Down ...

Social media can be a positive way to share information and engage in conversation. But it can also create risk for the Company if we do not use it responsibly.

- Comply with our information technology policies and procedures if you use social media on any Company devices.
- Do not let social media use interfere with your work.
- Be respectful and courteous online.
- Never share TreeHouse confidential information online.
- Never make it appear that your personal views are the views of TreeHouse.



When we work with integrity as our key ingredient, we earn our reputation as a trusted supplier. We all face challenges and choices in our work, where the right answer is not always clear. Doing the right thing, however, should always be clear, and if you have questions or concerns, remember that we have resources that can help.

CONCLUSION

Ethics Resources

1

YOUR SUPERVISOR

2

YOUR PLANT MANAGER

3

**YOUR HUMAN RESOURCES
REPRESENTATIVE**

4

**THE CHIEF HUMAN
RESOURCES OFFICER**

5

THE GENERAL COUNSEL

6

CHIEF COMPLIANCE OFFICER

7

**ANY MEMBER OF THE
LAW DEPARTMENT**

8

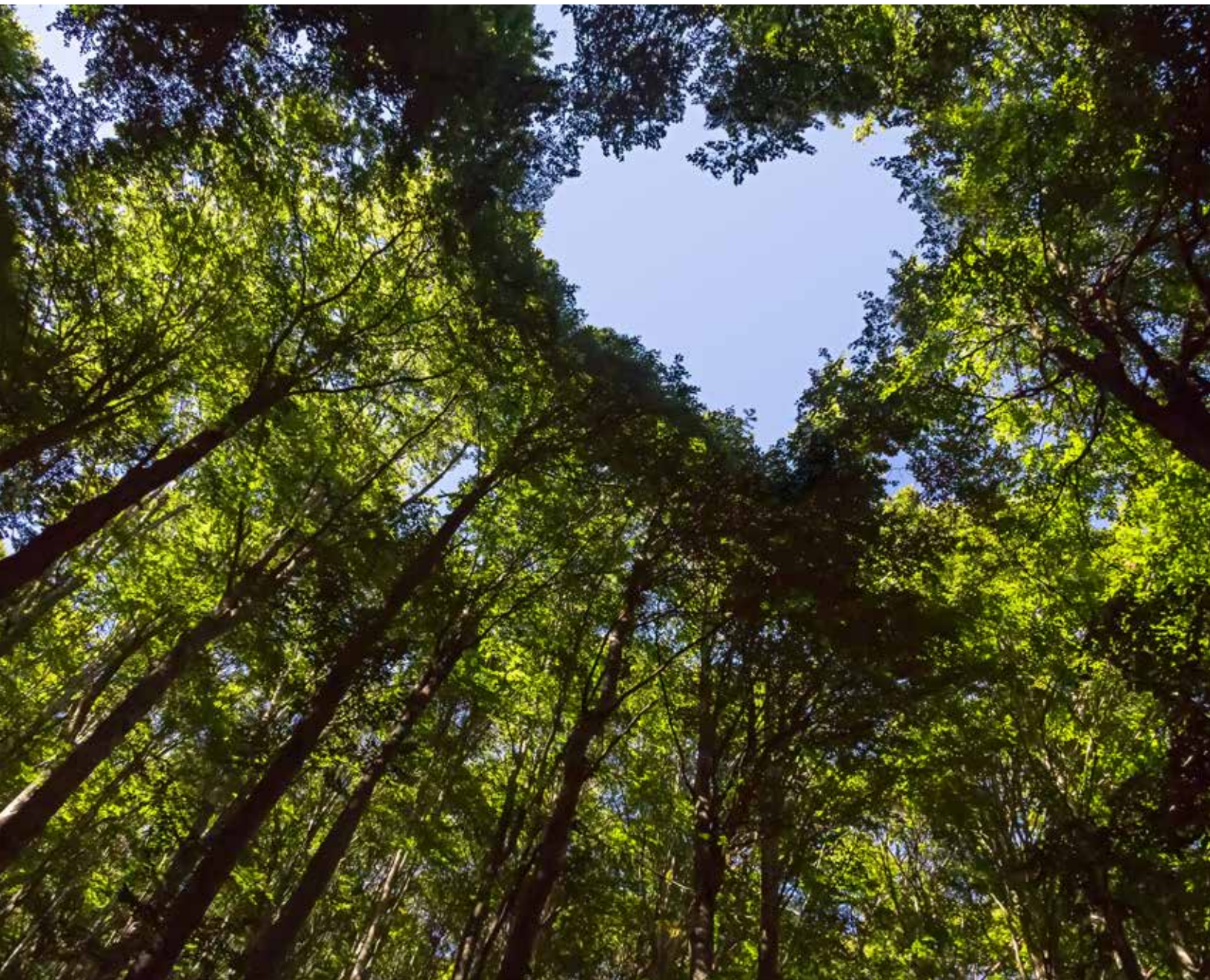
THE GENERAL AUDITOR

9

**OUR TREEHOUSE HOTLINE
1-800-763-0781**



TreeHouse policies, procedures and protocols are incorporated into this Code of Ethics and are amended from time to time. You should always reference and consult our most current versions. To do so, please go to our myTreeHouse intranet website and click on “Policies & Procedures” to find the policies, procedures and protocols referenced throughout this document.



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