

INTEGRITY

is our key
ingredient





Table of Contents

A Message from our Chairman and CEO	3
Introduction	
Purpose of the Code	4
Who is covered by the Code?	5
Our Values	6
Seeking Guidance and Reporting Concerns	7
No Retaliation	8
Workplace Environment	
We Prioritize Food Safety	10
We Deliver a Safe Workplace	11
We Treat Each Other With Respect and Dignity	12
We Promote Engagement and a Positive Culture	14
We Care About the World Around Us	15
Business Practices	
We Comply With the Law	18
We Do Not Engage in Corruption or Bribery	19
We Compete Fairly	21
We Reject Transactions with Sanctioned Countries and Prohibited Parties	22
We Handle Conflicts of Interest Ethically	23
We Prohibit Insider Trading	24
We Exchange Gifts and Entertainment Appropriately	26
We Make Political and Charitable Contributions in a Responsible Manner	27
We Communicate Clearly and Carefully	28
Corporate Assets	
We Protect Confidential Information and Intellectual Property	30
We Safeguard our Company Property and Systems	32
We Respect the Privacy of Personal Data	34
We Maintain Accurate, True and Complete Business Records	36
Ethics Resources	38

COVER PHOTO: Javaun Price, Plant Manager of TreeHouse Foods' Chicago facility.

A Message From Our Chairman and CEO



Welcome to TreeHouse Foods' Code of Ethics. At TreeHouse Foods, our Values are the foundation of our culture — and integrity is the key ingredient for our success. Our business is a unique one, where every day our customers trust us with their brands and their consumers. The privilege to leverage the strong brand reputation of our customers throughout our business comes with an enormous responsibility. As a result, honesty and integrity are the foundation of how we operate and are critical to our Company's long-term success.

This Code of Ethics (the "Code") is intended to serve as your guide so that we all consistently meet our purpose to Engage and Delight - One Customer at a Time. We can apply this Code, alongside our Values, to 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. The Code is our guidepost, it is what we aspire to achieve each and every day in our work at TreeHouse Foods.

Read this Code and use it as a resource as you perform your daily job duties and interact with TreeHouse Foods employees, customers, and vendors. If you ever have questions or concerns about how to proceed or about something you see that does not seem right, Speak Up and utilize one of the many available resources to communicate and elevate your concern.

Thank you for your commitment to following the guidelines set forth in this Code and for all that you do for TreeHouse Foods.

Sincerely,

Steve Oakland

Chairman, Chief Executive Officer & President



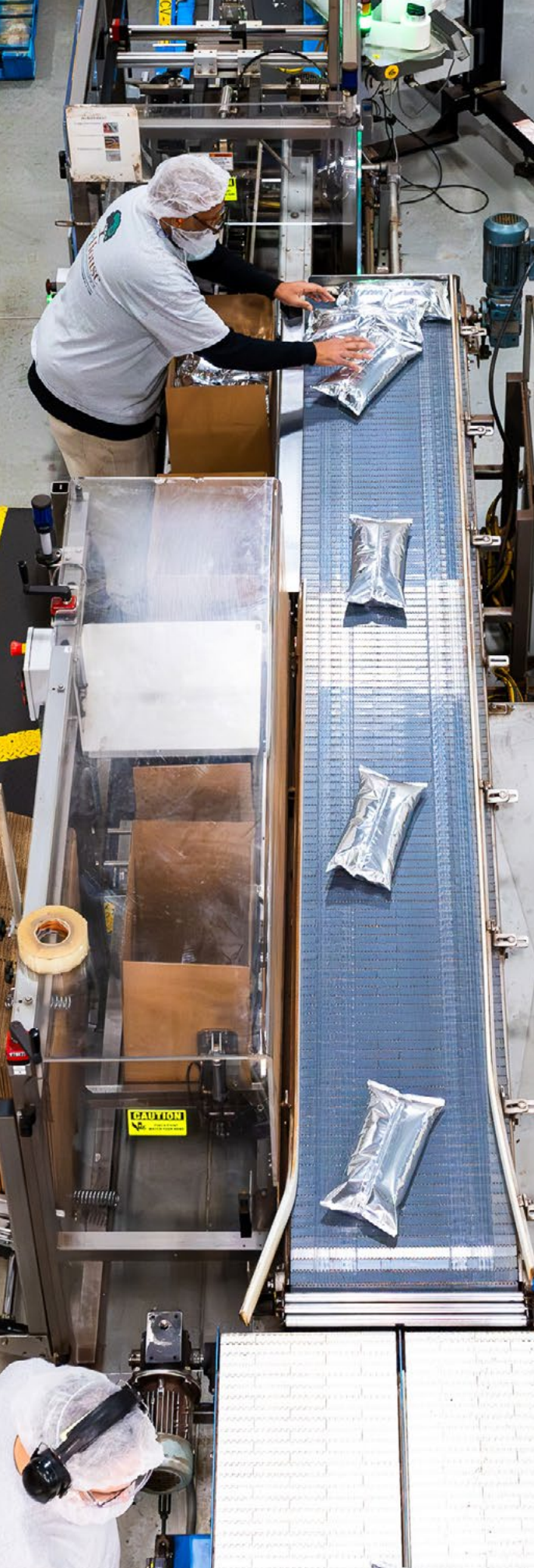
INTRODUCTION

Purpose of the Code

At TreeHouse Foods, Inc. and its subsidiaries (collectively “TreeHouse Foods” or “the Company”), our customers rely on us to be a trusted and responsible business partner and our employees count on us to make ethical decisions. The way you make decisions, handle concerns, and acknowledge different opinions will set the foundation for trust amongst your colleagues, customers, and stakeholders. Our values lead us to act with integrity, and Integrity is Our Key Ingredient in all our actions.

We developed this Code to serve as a framework for our business actions and practices. It provides us with high-level guidance and direction about difficult choices we might face. Our policies and procedures, some of which are referenced throughout this Code, provide additional guidance in certain areas.

The Code reflects and supports our Values, which serve as the foundation for our culture. Our Values must be the basis for every decision we make. In the spirit of our value to Own It, sections of the Code ask you to take key actions and responsibilities to heart and Commit to Excellence in everything you do in the workplace. As described throughout the Code, we want you to Be Agile, willing to evolve, and bring creative solutions to your work when necessary. Throughout the Code, we provide additional resources, including policies referenced in the “Learn More” sections, to enhance your knowledge. Most importantly, we want you to Speak Up and raise issues early to enable prompt action when required. When we follow the TreeHouse Foods Values, we will operate Better Together and, in doing so, set each of us up for success.



Who is covered by the Code?

Responsible Individuals

This Code governs all our decisions and actions everywhere we do business — and everywhere we represent the Company. The Code applies to all officers, directors, employees (full-time, part-time, temporary, and seasonal), independent contractors, and consultants. We expect all individuals who work on our behalf, including our suppliers, vendors, and business partners, to act responsibly, with integrity, and in accordance with the principles outlined in this Code.

We Are All Leaders

We all own the compliance culture within TreeHouse Foods. Leaders, however, have heightened responsibilities when it comes to this Code, including supporting a culture of compliance in accordance with TreeHouse Foods' Values. The way leaders make decisions, handle concerns, acknowledge differing opinions, and receive and share information sets the foundation for trust and openness within a team, a department, and a function.

Our Values

OWN IT



We do the right thing and act with integrity. We are all in — fully engaged and committed to achieving results. We follow through and are accountable to our commitment. We are proactive — creating opportunities for our business to win.

COMMIT TO EXCELLENCE



We are here to win. We have the highest standards — holding ourselves and others accountable to deliver exceptional results. We learn from our successes and failures. We celebrate our progress and results.

BE AGILE



We keep things simple. We move fast, responsibly. We fail fast, rapidly learning and improving. We embrace and harness change as a competitive advantage.

SPEAK UP



We are fully engaged and proactively bring points of view. We create a safe environment where healthy debate is celebrated. We are transparent in sharing information with each other and collaborate across functions. We raise issues early, engage as a team, and then move quickly to action.

BETTER TOGETHER



We win as TreeHouse Foods — operating as one diverse team, with everyone doing their part, to achieve enterprise-wide results. We have an open mind and assume positive intent. We set each other up for success. We use our collective expertise to get the best results.

Seeking Guidance and Reporting Concerns

Reporting concerns is both a responsibility and a requirement. If you suspect anything illegal, unethical, or not in line with our Values — or if something does not feel right — we need you to Speak Up. We know this can be difficult. By doing so, you will protect yourself, your fellow employees, and the reputation of TreeHouse Foods. Reporting and raising concerns is the right thing to do. Every concern raised is an opportunity to educate, clarify, or fix something within our business.

When you raise an issue, TreeHouse Foods will proceed with the appropriate process to handle the concern. TreeHouse Foods will keep all information reported confidential to the extent permitted by law and without compromising a thorough and effective response. We are all responsible for fostering a culture where we all feel comfortable speaking up if we have questions or concerns about what doesn't feel right, and that responsibility extends to participating and cooperating in all internal investigations for which you may have relevant information.

There are many resources available at TreeHouse Foods. 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 Chief Compliance Officer**
- **The General Counsel**
- **Any member of the Legal Department**
- **Any member of the Internal Audit team**

If you would like to raise any potential issue — including concerns about retaliation, quality, health, or safety — you can also always contact the Ethics & Compliance Hotline at 1-800-763-0781, or via email at complianceoffice@treehousefoods.com. We encourage reports from all, including those who may feel more comfortable reporting anonymously.



No Retaliation

At TreeHouse Foods, we don't tolerate any form of retaliation. We're committed to supporting anyone who reports a concern about a violation or potential misconduct in good faith.

Retaliation violates our Code — and can oftentimes violate the law. If you feel that you are being treated differently because you have raised a concern or asked a question, we urge you to report it to one of your Ethics Resources immediately. The sooner you speak up about something that does not feel right, the sooner we can address the issue.



TreeHouse Foods - Lancaster, PA

WORKPLACE ENVIRONMENT

- *We Prioritize Food Safety*
- *We Deliver a Safe Workplace*
- *We Treat Each Other with Respect and Dignity*
- *We Promote Engagement and a Positive Culture*
- *We Care About the World Around Us*

We Prioritize Food Safety

The safety and quality of our products is critical, and producing products that are safe and fit for human consumption is our greatest responsibility. TreeHouse Foods follows “good manufacturing practices” (“GMPs”) throughout all 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:

- Comply with all food and product safety laws, protocols, and policies that apply to our work.
- Prioritize safe manufacturing by never taking short cuts or working around controls.
- Maintain and follow strict hygiene policies.
- Keep good safety records.
- Use safe and inspected equipment.

LEARN MORE:

- Food Safety & Quality Policies
- Responsible Sourcing & Social Responsibility Policy



LIVING OUR VALUES:

COMMIT TO EXCELLENCE

Part of how we Commit to Excellence is by working with suppliers who prioritize integrity like we do. We work with our suppliers to promote production quality, supply chain traceability, and accurate and transparent labeling.

We Deliver a Safe Workplace

Nothing is more important to our Company than operating a safe workplace. A safe workplace inspires trust and allows us all to contribute and succeed. At TreeHouse Foods, we all play a role in keeping our surroundings safe and secure, leading to a better workplace for everyone. We comply with all health, safety, and environmental laws regulations, policies, and procedures that apply to our business. We also maintain a workplace that is free from drugs, violence, and weapons.

OWN IT:

- Wear personal protective clothing and equipment and participate in training on operating machinery whenever required.
- Start work only if there are no apparent hazards — and stop work immediately and Speak Up if any hazards arise.
- Do not act in a way that could be perceived as violent or threatening.
- Do not show up to work while impaired by any substance, such as drugs or alcohol.
- Do not bring weapons of any sort or firearms onto Company property.

LEARN MORE:

- Food Safety & Quality Incident Reporting Policy
- Drug and Alcohol-Free Workplace Policy
- Workplace Violence Prevention Policy

LIVING OUR VALUES:

SPEAK UP

A truly safe workplace depends on all of us to Speak Up if we have any questions or concerns about safety. Live our Values and report any safety concerns, incidents, or threats of workplace violence to your site safety leader, a supervisor, manager, or Human Resources as soon as possible.



We Treat Each Other With Respect and Dignity



LIVING OUR VALUES:

BETTER TOGETHER

Being Better Together means thinking about how our words and actions could be perceived by those around us. It's important to remember that something we find amusing might make someone else feel uncomfortable. We create an inclusive and respectful workplace when we consider the feelings of everyone around us.

At TreeHouse Foods, we strive to be Better Together. We work better together when we create an environment that is grounded in mutual respect. We expect everyone to treat one another professionally and respectfully. TreeHouse Foods prohibits harassment and discrimination in all forms.

OWN IT:

- Be courteous and considerate when working with coworkers, customers, suppliers, or anyone else and avoid inappropriate conversations.
- Refuse to engage in conduct that is or can be deemed harassing to others.
- Speak up if you feel mistreated or have concerns that someone around you is being mistreated by making a report to one of your Ethics Resources.

LEARN MORE:

- Anti-Harassment, Non-Discrimination, and Anti-Bullying Policy



What is Harassment?

- Harassment can be sexual or non-sexual in nature.
- Harassment can happen through words alone (like telling inappropriate jokes or repeatedly asking someone on a date).
- Harassment can happen by sending someone inappropriate emails or pictures.
- Harassment can involve unwanted touching or physical contact.
- Harassment can include bullying and intimidation.
- Harassment can impact everyone and can happen regardless of gender, age, race or ethnicity.

What is Discrimination?

- Discrimination can involve treating an individual differently based on characteristics unique to that individual.
- Antidiscrimination laws protect individuals from being treated differently based on these unique characteristics.
- No one should be discriminated against based on:
 - Race
 - Religion
 - Sex
 - Sexual Orientation
 - National Origin
 - Ethnicity
 - Age
 - Ancestry
 - Gender Identity or Expression
 - Genetic Information
 - Family or Medical Care Leave
 - Medical Condition
 - Pregnancy
 - Physical or Mental Disability
 - Marital Status
 - Protected Veteran Status

We Promote Engagement and a Positive Culture

At TreeHouse Foods, we believe a positive culture and environment exists when we value and respect the expertise, contributions, and ideas of others, especially when their backgrounds and experiences differ from our own. Those different ideas allow us to Be Agile in executing our business priorities. Our work environment is inclusive and thrives on an engaged team with common goals.

OWN IT:

- Keep an open mind to perspectives that might be different from your own.
- Take steps to foster a strong, connected and engaged team, by encouraging those around you to share their thoughts and ideas.
- Provide equal employment opportunities to all qualified candidates and make employment-based decisions based on skills, capabilities, and experiences — and not based on characteristics protected by the law, including anti-discrimination laws.
- Do not discriminate against individuals with disabilities and provide reasonable accommodations when appropriate.

LEARN MORE:

- Anti-Harassment, Non-Discrimination, and Anti-Bullying Policy
- Equal Employment Opportunity Policy
- Accommodations Policy



BE AGILE



LIVING OUR VALUES:

BE AGILE

To Be Agile requires an engaged culture that goes beyond avoiding discrimination, enabling everyone at TreeHouse Foods to bring their true self to work each and every day. We foster an open and engaged culture by proactively supporting and encouraging each other every day, recognizing our unconscious biases, and taking steps to make everyone feel welcome.

We Care About the World Around Us

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. The TreeHouse Foods Environmental, Social, and Governance (“ESG”) strategy outlines goals on how we bring ESG to life. We comply with all environmental regulations that apply to us and do everything possible to conduct our business in a sustainable way.

We are Better Together by supporting and respecting the rights of all people and complying with all applicable laws pertaining to freedom of association, privacy, collective bargaining, immigration, and working time, wages and hours. We follow all applicable laws prohibiting human trafficking, employment discrimination, and forced, compulsory, and child labor.

OWN IT:

- Do what we can to reduce waste in our day-to-day activities and regularly review our practices for efficiency.
- Demonstrate respect for human rights and Speak Up if we ever feel that a person or group of people are being subjected to mistreatment.
- Choose to work with business partners who share our commitment to take care of our surroundings.
- Commit to our ESG strategies and goals.
- Hold ourselves to the highest standards – from the products we manufacture to the services we provide.

LEARN MORE:

- Responsible Sourcing & Social Responsibility Policy

LIVING OUR VALUES:

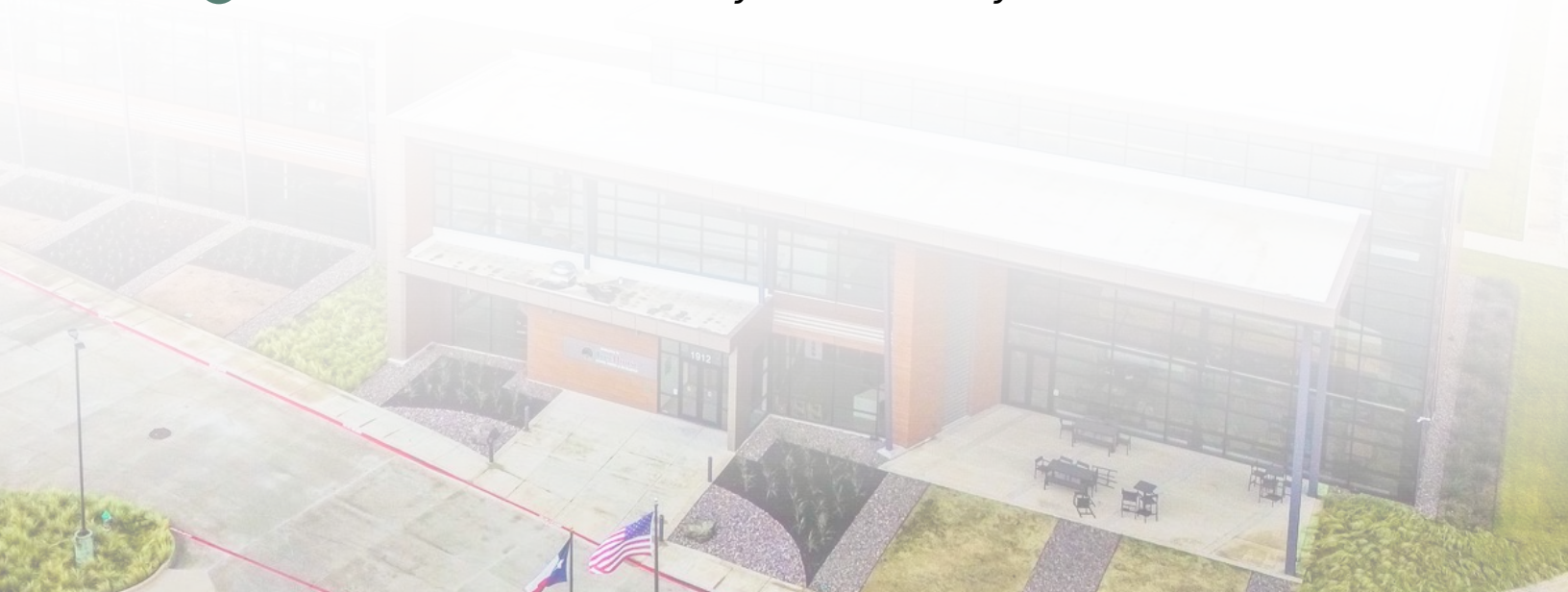
BETTER TOGETHER

Part of taking care of the world around us requires us to choose suppliers and business partners who share our commitment to care about our surroundings. When selecting suppliers and business partners, we look for those who abide by fair labor practices, human rights, and ethics. We are Better Together when we take an integral approach to environmental stewardship by working with suppliers that strive to mitigate the environmental impact of their operations, goods, and services.



BUSINESS PRACTICES

- *We Comply with the Law*
- *We Do Not Engage in Corruption or Bribery*
- *We Compete Fairly*
- *We Reject Transactions with Sanctioned Countries and Prohibited Parties*
- *We Handle Conflicts of Interest Ethically*
- *We Prohibit Insider Trading*
- *We Exchange Gifts and Entertainment Appropriately*
- *We Make Political and Charitable Contributions in a Responsible Manner*
- *We Communicate Clearly and Carefully*



While this Code provides important guidance in many situations, it cannot possibly answer each and every question we may face. While the provisions in this section focus on how we Commit to Excellence by following the laws that relate to our business, we also need to exercise good judgment in making decisions.

Ask yourself the following questions when you are faced with a difficult decision:

- Is it legal and safe?
 - Is it consistent with TreeHouse Foods' Values and this Code?
 - Will the decision negatively impact TreeHouse Foods' reputation?
 - Would I feel comfortable if my decision was known to our leadership team, our directors, or even reported in the media?
 - Would my friends and family be proud of my decision?
-



We Comply with the Law

There are many laws that govern how we do business, and it is our obligation to comply with all of them. No one is expected to be an expert in every aspect of the law. There are Company resources available to educate, train, and refresh employees on relevant legal guidelines relating to specific job functions. Similarly, while this Code provides important guidance, nothing is a substitute for good judgment.

When the Company does business with U.S. government agencies, federal government contractors, or local governmental entities, we must be mindful of any special laws, requirements, regulations, or ordinances that apply to our work. Those who work on government contracts must understand and follow any requirements and work closely with the Legal Department to promote compliance.

OWN IT:

- Do not conceal information from the government, make false statements, or create false records.
- Comply with the specific government contracting policies and procedures that apply to our roles, including attaining approval from the Legal Department before entering into government contracts.
- Manage our records and respond to all government requests for information in a timely and expeditious manner.
- Exchange gifts or entertainment only if reasonable and pre-approved by the Legal Department.
- Comply with all written contracts with our customers and suppliers and follow all policies and procedures that apply to our daily work.
- Confirm that those who work with us and on our behalf also comply with all government contracting laws.

LEARN MORE:

- Dealing with Government Agencies Policy

LIVING OUR VALUES:

COMMIT TO EXCELLENCE

To demonstrate how we Commit to Excellence, we must represent the Company positively – both in words and in action – when interacting with customers and suppliers, including government agencies. We act professionally at all times and demonstrate familiarity with the rules and contracts that apply to our work together.

COMMIT TO
EXCELLENCE



We Do Not Engage in Corruption or Bribery

At TreeHouse Foods, we prohibit bribery – in any place and at any time. Anti-bribery laws prohibit exchanging or offering money or anything of value to a government official or a commercial entity to improperly influence a business decision or obtain a business advantage. Corruption can damage our reputation and markets and tarnishes our push to Commit to Excellence in the way we operate our business.

OWN IT:

- Do not offer anything of value to try to elicit a favorable business action.
- Do not try to hide or conceal a payment and record all payments and transactions correctly, truthfully, and in accordance with policies, procedures, and relevant law.
- Oversee the work of third parties diligently, taking care to make sure that those who work on our behalf uphold our ethical standards, as we can be held liable for their actions.

LEARN MORE:

- Anti-bribery and Anti-corruption Policy



LIVING OUR VALUES:

COMMIT TO EXCELLENCE

We succeed only if we choose to Commit to Excellence by partnering with individuals and organizations that understand and comply with our standards and principles. We Commit to Excellence when we remain observant and recognize warning signs when working with our business partners.

Warning signs include:

- Operating without permits
- Unusual payment or accounting terms or arrangements
- Over-invoicing or inaccurate invoices
- Failure to comply with our policies
- Unwillingness to attest to our Code of Ethics or other anti-corruption requirements



What is Bribery and Corruption?

Bribes happen 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

Corruption includes acts of bribery, kickbacks, payoffs, facilitation payments, or any other type of improper benefit.

We Compete Fairly

At TreeHouse Foods, we strive to compete fairly and transparently. The way we compete is as important as what we achieve. We Commit to Excellence when we value our relationships with customers, suppliers, competitors, and employees and deal with them fairly and honestly. There are laws around the world that protect the market 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:

- Respect competitive bidding processes and never rig or fix the outcomes.
- Be careful at trade association meetings to avoid pricing conversations that relate in any way to nonpublic business information.
- Be mindful in our email communications and avoid discussions or arrangements that may be perceived as anti-competitive.
- Do not engage in unfair, deceptive, or misleading practices.
- Do not make agreements, discuss, or share sensitive information with competitors without prior written approval from the Legal department.
- Base all purchasing and sales decisions on quality, value, and customer service.
- Seek guidance from the Legal Department if you are unsure of how to comply with these provisions.

LEARN MORE:

- Fair Dealing and Antitrust Policy
- Communications with Direct Competitors Policy



COMMIT TO
EXCELLENCE

LIVING OUR VALUES:

COMMIT TO EXCELLENCE

We are here to win, but we always demonstrate high standards. We Commit to Excellence by respecting the confidential information and intellectual property rights of our business partners and competitors. We rely on the strength of our products and present them in a fair and honest manner and we never misrepresent who we are when gathering competitive intelligence.

We Reject Transactions with Sanctioned Countries and Prohibited Parties



LIVING OUR VALUES:

BE AGILE

Trade control laws can be complex, and information is always changing. We live our Be Agile Value by always staying on top of and learning how trade control laws apply to our work. For example, the list of countries that may be subject to sanctions or trade embargoes is ever changing. When working on international transactions, we must always do our diligence.

At TreeHouse Foods, 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 Be Agile, understanding and complying with the specific rules that apply to the work we do.

OWN IT:

- Do not engage in any commercial or financial transactions with individuals, companies, entities, or countries subject to economic sanctions.
- Do not export controlled goods, services, software, technology, or technical data to prohibited countries or end users.
- Take responsibility to confirm our ability to sell or buy from a customer or country.
- Obtain necessary licenses and permits, submit required forms, and pay appropriate taxes if required to do business.
- Take reasonable steps to identify and screen the ultimate end users for our products against any relevant sanctioned country and denied-party lists before doing business.
- Look closely at all terms and conditions in letters of credit, purchase orders, and contracts with international entities.
- Contact the Legal Department if TreeHouse Foods is ever asked to participate in a boycott.

LEARN MORE:

- Trade Controls Policy
- Dealing with Government Agencies Policy

We Handle Conflicts of Interest Ethically

At TreeHouse Foods we have a responsibility to make business decisions solely on the principles of sound business judgment. To be Better Together, we must avoid conflicts of interest. A conflict of interest arises when you have a financial or personal interest that could interfere, or even appear to interfere, with the interests of the Company. A conflict of interest also arises when you, or a member of your family, receive improper personal benefits because of your position in the Company. If we don't handle conflicts of interest properly, they can create the appearance of a lack of fairness and integrity, and harm TreeHouse Foods' reputation.

OWN IT:

- Do not engage in outside work with TreeHouse Foods' competitors or suppliers outside of your specified employment responsibilities with TreeHouse Foods.
- Do not participate in activities that could have a negative impact on the Company's reputation.
- Do not make personnel or business decisions if they could impact family members, friends, or anyone with whom you are romantically involved.
- Do not use your title or position with the Company or corporate property or information for improper personal gain.
- Do not take advantage of opportunities discovered or made available by using Company resources or information or your title or position.
- Refrain from using Company resources for your own personal benefit or the benefit of family or friends.

LEARN MORE:

- Conflicts of Interest Policy
- Personal Relationships Policy

LIVING OUR VALUES:

BETTER TOGETHER

Being transparent about conflicts and potential conflicts of interest does not mean we can never pursue opportunities outside of our work at TreeHouse Foods. Often, employees and the Company can work together to evaluate and resolve or manage potential conflicts. Disclosing conflicts and potential conflicts of interest to the Company enables us to find solutions that work for everyone involved, and makes us Better Together.



We Prohibit Insider Trading

At TreeHouse Foods, we Own It by maintaining the trust of our investors and the public and complying with laws that prohibit insider trading. Buying, selling, or trading in Company, competitor, or third-party securities while in possession of material non-public information is considered “insider trading” and is illegal.

Material non-public information is information that has not been made available to the public and that a reasonable person would consider important when making an investment decision. 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. Violating insider trading laws can result in civil and criminal penalties for both the individual and the Company.

OWN IT:

- Do not trade stock based on material, non-public information.
- Do not provide information to another individual so they can make a trade based on that information.
- Be careful with information that relates to new products, acquisitions, divestitures, and mergers..
- Consult with the Legal Department if you have any questions regarding what may be considered inside information and/or who you may be able to discuss inside information with.
- Safeguard confidential information that may be considered inside information.

LEARN MORE:

- Insider Trading Policy



OWN IT



LIVING OUR VALUES:

OWN IT

We all share in the responsibility of protecting confidential information that could be considered inside information. We Own It by exercising caution and avoiding even the appearance of anything improper when privy to inside information.



What is Material, Non-Public Information?

Material, non-public information includes:

- Information that, if made public, would likely have an impact on a company's stock price.
- Information that relates to a company's finances, marketing, or product strategies.
- Information that involves any changes in the executive leadership of a company.
- Information that involves regulatory or litigation developments.

We Exchange Gifts and Entertainment Appropriately

At TreeHouse Foods, we Commit to Excellence every day, demonstrating sound judgment when exchanging gifts with our business contacts. Giving and receiving reasonable gifts and entertainment can build goodwill, particularly when it contributes to the development of working relationships. However, gifts, meals, entertainment, or trips erode trust when they are extravagant, lack a legitimate business purpose, or lack transparency. Gifts and entertainment must never impact our ability to make objective business decisions.

OWN IT:

- Do not offer or accept any form of gift or entertainment if it is meant to gain an unfair business advantage.
- Only offer or accept gifts if they have been reported and approved by our direct supervisors and they are nominal in value, given infrequently, and are consistent with accepted customs and practices.
- Do not ever offer or accept cash or cash equivalents (such as gift cards or gift certificates).
- Be aware of the recipient's rules on receiving gifts and/or entertainment and comply with them.
- Confirm that there is a legitimate business interest before offering to provide or accept business entertainment and that it complies with our Gifts and Entertainment Policy.
- Participate in business entertainment only if it is limited in frequency and modest in value.
- Pay close attention to specific rules that apply when working with government contractors, public officials, or foreign entities and consult the Legal Department with questions.

LEARN MORE:

- Travel and Entertainment Expenses Policy

LIVING OUR VALUES:

COMMIT TO EXCELLENCE

We are all responsible for proactively protecting our reputation as an ethical business and avoiding any gifts or entertainment that could be viewed in a negative light. We Commit to Excellence by being fair and avoiding even the appearance that preferential treatment may have been given or received in a business transaction. We never make business partners feel obligated to provide something of personal value to us to do business with TreeHouse Foods.



We Make Political and Charitable Contributions in a Responsible Manner

TreeHouse Foods supports the individual participation of our employees in political activities and charitable endeavors on their personal time — in fact, political and charitable participation often makes us Better Together. We follow all laws governing corporate political activities, lobbying, and contributions. The Company does not support political parties or candidates for public office, nor do we reimburse employees for political or charitable contributions.

OWN IT:

- Keep our personal political and charitable activities separate from the work we do for TreeHouse Foods.
- Make it clear that our personal beliefs are our own and not those of the Company.
- Do not advocate for personal political and/or charitable positions to Company customers, suppliers, or employees.
- Do not use Company time, facilities, funds, or any other Company resources to support personal political or charitable interests.
- Do not use your position to solicit contributions from our business partners or co-workers on behalf of a political candidate or a charitable cause.

LEARN MORE:

- Political Activities & Contributions Policy

LIVING OUR VALUES:

BETTER TOGETHER

There are times when we might not see eye to eye with each other when it comes to political issues. But we will always be Better Together by being respectful of the personal views of our fellow employees and business partners.



We Communicate Clearly and Carefully

At TreeHouse Foods, we speak with one voice to investors, analysts, the press, and the public. To Commit to Excellence, the Company's communications must be full, fair, accurate, timely, and understandable. Social media is a powerful tool that can be used to advance our brand and reputation, but it also presents certain risks and carries with it important responsibilities.

OWN IT:

- Only speak publicly on behalf of TreeHouse Foods if we are specifically authorized to do so as part of our job.
- Be respectful and courteous when communicating using online platforms, email, or other electronic means.
- Obtain authorization before speaking on behalf of the Company with investors, analysts, the press, and the public.
- Communicate professionally so that our image as a leader in the industry remains intact.
- Make it clear that any personal opinions you share on social media are yours and not the opinions of the Company or an official position of the Company.
- Never post confidential or proprietary information about the Company or any of the third parties with whom we work.
- Remember that our Code is not intended to interfere with, restrain, or prevent any employee communications regarding wages, hours, or other terms and conditions of employment.

LEARN MORE:

- Social Media Policy
- Public Communications Policy

LIVING OUR VALUES:

COMMIT TO EXCELLENCE

Our communications reflect our TreeHouse Foods Values, including respecting each other and our diverse perspectives. And, when our communications are truthful and consistent, we show the world that we are a trustworthy business that is Committed to Excellence.



CORPORATE ASSETS

- *We Protect Confidential Information and Intellectual Property*
- *We Safeguard Our Company Property and Systems*
- *We Respect the Privacy of Personal Data*
- *We Maintain Accurate, True and Complete Business Records*



We Protect Confidential Information and Intellectual Property

As part of our job responsibilities, we may have access to confidential information or proprietary information about TreeHouse Foods or one of our business partners. We may also have information about the Company's intellectual property. We must treat all confidential information and intellectual property carefully at all times. Our ability to Be Agile and grow and sustain our business depends in large part on confidential and proprietary information about our strategies and processes.

OWN IT:

- Do not share confidential information with other TreeHouse Foods employees unless they need it to do their job.
- Do not share confidential information outside of TreeHouse Foods unless disclosure is authorized by the Legal Department or legally mandated.
- Do not discuss confidential information in public where others could overhear.
- Do not authorize the use of our intellectual property such as our logos, brands, formulas, trademarks, patents, copyrights, or other intangible property without first receiving authorization to do so from the Legal Department.
- Understand that our responsibility to safeguard confidential information continues even when we no longer work for the Company.
- Return any confidential and proprietary information about the Company, its customers, or clients that was not intended for us.
- Consult with the Legal Department when we are unsure if information is confidential, proprietary, or intellectual property.

LEARN MORE:

- Information and Data Privacy Policy



LIVING OUR VALUES:

BE AGILE

The world around us is changing. We need to Be Agile but alert to new challenges that arise when it comes to keeping our information safe. For example, in your role, you may encounter artificial intelligence (“AI”) tools that might assist you in your work. It’s important to consider the potential risks to the Company before using AI.

Ask yourself:

- Could this AI tool expose personal data?
- Am I inputting confidential or proprietary information into an AI tool?
- Am I putting our intellectual property at risk?

You should always seek permission and approval before downloading any AI tool onto a Company device or inputting any Company information into an AI tool.



What is Confidential Information?

Confidential information is any information of a confidential, proprietary, or secret nature related to our business, including non-public information that might be of use to competitors, or harmful to TreeHouse Foods if disclosed. Some examples include:

- Confidential business processes, practices, or results of operations
- Trade secrets, formulas, manufacturing techniques, research and development information, business plans or forecasts
- Plans with respect to proposed acquisitions of other companies or assets or sales of assets

We Safeguard our Company Property and Systems



LIVING OUR VALUES:

BETTER TOGETHER

Protecting our Company assets is fundamental to maintaining our competitive edge and achieving results. We are Better Together when we use our Company assets responsibly, because we all play a role in TreeHouse Foods' continued success as a business.

At TreeHouse Foods, we are all responsible for safeguarding our physical assets, our intangible assets, and our technology systems from theft, loss, carelessness, waste, and fraud. We are Better Together when we use TreeHouse Foods' network and computer systems ethically and legally, treating these assets with care.

OWN IT:

- Use the Company's assets according to our Company policies and primarily for business purposes.
- Remember that the assets you use at work, both physical and technological, belong to the Company and should be utilized with care and in accordance with law and all applicable policies.
- Keep in mind that any information generated on the Company's email, voicemail, telephone, and internet connections while conducting business belongs to the Company and must be protected.
- Use safe computer passwords that comply with Company requirements, and never store information about TreeHouse Foods on computers or mobile devices that have not been approved by the Company.
- Safely store and protect the Company's physical assets to prevent misuse, tampering, or theft.
- Do not use Company assets or technology systems in an inappropriate manner or for illegal or unethical purposes.

LEARN MORE:

- Anti-Harassment, Non-Discrimination, and Anti-Bullying Policy



What is a Company Asset?

TreeHouse Foods assets include anything that belongs to the Company, such as:

- Our physical assets including equipment, office supplies, inventory, hardware, tools, vehicles, and materials.
- Our intangible assets, including the TreeHouse Foods name, logos, trademarks, patents, copyrights, trade secrets, plans, and strategies.
- Our technology, including our computer equipment and information systems.
- Our intellectual property

We Respect the Privacy of Personal Data



LIVING OUR VALUES:

COMMIT TO EXCELLENCE

Protecting confidential information and data is crucial to our business relationships and trustworthiness. We Commit to Excellence when we respect the privacy of our employees, partners, and customers, enabling us to maintain our trustworthy reputation and our competitive advantage in the marketplace.

During the course of performing our work, we may collect, store, share, and process personally identifiable information (“PII”), confidential information, and/or data about our employees, customers, suppliers, vendors, and others. We must keep this information and data safe and protect the privacy rights of all individuals whose information we access and store.

OWN IT:

- Understand that only authorized employees, based upon defined job function, are permitted to access personal employee information. Do not share PII unless you have written permission to do so.
- Be mindful of our surroundings and maintain privacy when engaging in conversations about data or PII.
- Follow the Company’s encryption procedures when sending PII via email.
- Collect and store PII only when necessary.
- Promptly report any actual or potential data breaches, or other risks to PII or confidential data.
- Do not share confidential protected data or PII with anyone if you come across it inadvertently

LEARN MORE:

- Information and Data Privacy Policy
- HIPAA Policy



What is Personally Identifiable Information (PII)?

PII includes information that can help identify an individual and information that an individual has the right to keep private. For example, something as simple as a person's name or birthday may be considered PII. Similarly, email addresses, work history, social security numbers, age, and race may constitute PII.

We Maintain Accurate, True and Complete Business Records

At TreeHouse Foods, we record and report our information clearly, accurately, and completely. We Commit to Excellence by reporting our financial results and other information about the Company in a transparent and timely manner and managing our records responsibly. We comply with all reporting and record requirements and have appropriate controls, policies, and procedures in place.

OWN IT:

- Enter all expenses and costs truthfully and accurately.
- Report our time and work accurately.
- Always be timely, clear, and accurate when creating any business record.
- Cooperate with internal and external auditors.
- Immediately report any mistakes or concerns regarding financial entries.
- Keep or discard all records in accordance with the Records Management Policy.
- Follow all legal requirements when maintaining, retaining, and destroying Company records, whether paper or electronic

LEARN MORE:

- Records Management Policy

LIVING OUR VALUES:

COMMIT TO EXCELLENCE

Our records paint a portrait of our financial position as a public company. When we manage our records responsibly, we show the world that we Commit to Excellence by conducting our business ethically and with integrity.





What is Fraud?

Fraud is committed to gain something of value or to avoid negative consequences. Examples of fraud include:

- Misstating financial information in our books and records
- Altering manufacturing numbers to meet productivity goals
- Misrepresenting sales of products to meet sales goals or gain business
- Failing to issue purchase orders or properly price goods
- Misreporting hours worked to earn pay for work not performed.

Ethics Resources

We have any number of resources listed below that you can consult for any concerns related to this Code. We have multiple places to go so you can feel comfortable bringing your concerns to the right place. You can also use the Hotline number listed below to raise complaints. If you call the Hotline, you may identify yourself or remain anonymous.

- **SUPERVISORS**
- **PLANT MANAGERS**
- **HUMAN RESOURCES REPRESENTATIVES**
- **CHIEF HUMAN RESOURCES OFFICER**
- **GENERAL COUNSEL**
- **CHIEF COMPLIANCE OFFICER**
- **LEGAL DEPARTMENT**
- **INTERNAL AUDIT DEPARTMENT**
- **ETHICS & COMPLIANCE HOTLINE**
1-800-763-0781

The Compliance Department ensures that all matters are investigated in a thorough and complete manner. We expect everyone who is part of an investigation to cooperate, speak openly, and truthfully, so we can have as much information as possible to complete our investigation. Should you have any questions about the investigation process, please reach out to the Compliance Office at complianceoffice@treehousefoods.com



TreeHouseTM
FOODS