



Ferrara®

OUR CODE OF CONDUCT

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FROM OUR CEO

Dear Friends and Colleagues,

Thank you for taking the time to review Ferrara's Code of Conduct. Our Code unites our team with clear expectations to ensure we make the best decisions for our business and company culture.

Our values help guide the organization to accomplish our vision of being the global leader in sugar confections, nurturing partnerships anchored in mutual trust, and more importantly, igniting a world class organization that succeeds, together.

As you read through our Code, remember it is here to guide you should you face difficult or unexpected decisions. Simply, the Code is an articulation of what it means to operate with integrity at Ferrara, and only with integrity do we build an ethical culture that guides our decision-making.

We entrust every employee to take pride and responsibility in protecting our special culture and unique business. Therefore, I encourage you to boldly voice any difficulties or challenges you experience or witness that may conflict with our policies. Your insights are always valued and will be treated with the greatest of respect in confidence.

If you have questions or need to report a concern, please reach out to your manager or our Office of Ethics and Compliance directly. You may also use our anonymous Ethics and Compliance Helpline, available 24/7.

Thank you for making Ferrara a safe, welcoming and successful place where we work together, *sharing delight in every bite.*

Marco Capurso

Marco Capurso



HONORING THE CODE

Every day, we **Share Delight in Every Bite** for our consumers, our employees, our customers, and the communities in which we live and work. Integrity is the essential ingredient of our mission. We earn and maintain **trust** not only through the quality of our products, but also through the integrity in our actions. Without integrity, our mission will fail.

Our **Code of Conduct** (the “Code”) should orient every decision we make, as every decision affects our reputation, both inside and outside the Company, and ensures we act with integrity.

Our Code articulates the **high standards** that we always strive to attain.

Our Code sets out **the principles** that should govern our work and interaction at Ferrara. But the Code cannot address every situation. For more in-depth guidance on day-to-day activities, the Company issues **policies** (the “Policies”) grounded in our Code. These Policies may be found at [Ferrara’s Policy Portal](#).

For situations not covered by the Code of Conduct or Policies, employees must use their best judgment and raise any questions or concerns with their manager or contact the [Office of Ethics and Compliance](#) or the [Legal Department](#).

Together, the Code and Policies **orient how we work** and how we work with each other, with customers, with suppliers and the broader community.

If you encounter a situation **where you question** what the right choice is, turn to our Code for help. It will help you preserve our reputation and ensure that we live our values. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear.



Taking Delight in INTEGRITY

Perspectives on business conduct may differ throughout the world. If local customs **conflict** with our Code, follow the Code. If you are not sure what to do, ask your manager or contact the Office of Ethics and Compliance or the Legal Department.

<http://ferrara.bz/ECHotline>
1-800-461-9330



INTEGRITY IN OUR VALUES

Ferrara is going places. Our vision is clear. And we are determined to be the leader of the sugar category while continuing to provide delight to consumers around the world with every bite of our products.

Our aspirations are achievable only through our passion for people and inclusion, a commitment to innovation, service to our community, pursuing the highest standards in quality, compliance, safety, and performance, and acting with integrity in everything we do. In short:

- **We are Empowering:** We equip, encourage and trust our people to make the right decisions and deliver results
- **We are Collaborative:** We work together to multiply our collective contributions and deliver greater value for the company.
- **We are Agile:** We adapt quickly as a competitive advantage and continuously strengthen our foundational structure and processes.
- **We lead with Integrity:** We are transparent, courageous, and hold ourselves accountable to do what's right over what's easy.
- **We are Empathetic:** We embrace the unique perspectives of others and build meaningful connections to foster inclusion.



LEADING WITH INTEGRITY **AT FERRARA**

NAVIGATING THE CODE

Following the Code means knowing when to act and when not to act. The Code is explained in these terms and organized by describing **what WE DO** and **what WE DO NOT DO** as individuals who lead with integrity.

The DOs and DONTs of the Code are organized into four sections:

- (1) Leading with integrity **at Ferrara**
- (2) Leading with integrity in **our industry**
- (3) Leading with integrity in **the marketplace**
- (4) Leading with integrity in **the community**

This document includes real-life scenarios of the Code in action. No two situations are the same, but these examples illustrate how the Code should be applied.

This document also includes helpful links to information, guidance and policies related to the Code, explanations of certain Code sections, and instructions for how to ask questions about the Code and make reports about potential Code violations.



WE SPEAK UP

It is everyone's responsibility to speak up.

If you sense that something is not right, speak up. If you saw or heard something that might have violated our Code or our policies, speak up. We build trust internally and externally when we speak up.

MAKING A REPORT

While a brief discussion with your manager will likely resolve most concerns, please know that you have a **myriad of other ways** to raise your concerns.

Our Contacts page contains a list of resources to [assist you, including our Ethics and Compliance Hotline, a way for you to anonymously share your concerns 24 hours a day, 7 days a week.](#)

WHAT HAPPENS WHEN YOU REPORT A CONCERN?

- You can decide to **remain anonymous**. If you disclose your identity, we will do our best to protect it
- We take **every report seriously** and will investigate it thoroughly
- We will expect everyone involved to **cooperate fully** and honestly
- We will **determine** whether a violation of our Code occurred
- If a violation of our Code has occurred, Ferrara will take **remedial and disciplinary action** as appropriate in accordance with applicable law



WE DO NOT RETALIATE

We do not tolerate retaliation. We will ensure that you are not retaliated against for raising a concern in good-faith or for cooperating in an investigation about a claim of noncompliance with our Code.

Further, our Code **prohibits** taking any action that would reasonably deter someone from reporting a concern or participating in a code investigation.

The fact that you report in good faith the misconduct of someone else **will not shield** you, however, from disciplinary action concerning your own misconduct.

Leading with INTEGRITY

You do not have to know all the details or facts to make a report. If you truthfully tell us what you know, we will respect and investigate your good faith report. Please report any conduct that you honestly believe is inappropriate or unlawful. It helps protect the Company and creates a culture of accountability, transparency and openness.

NO FALSE ACCUSATIONS

We encourage honest reporting, but we **do not tolerate** reports based on facts the reporter knows to be false. Making a false accusation diverts investigatory resources away from good-faith concerns. Report when you have a reasonable, good-faith concern, but never knowingly make a **false accusation**, lie to investigators or refuse to cooperate in an investigation.

COOPERATING WITH INVESTIGATIONS

When an investigation is underway, **cooperate and respond promptly** to information requests, including requests for documents or records. Share what you know, honestly and completely. To maintain the integrity of investigation, you may be required **not to discuss** the investigation and keep it confidential.



CONSEQUENCES FOR VIOLATIONS

Anyone found to have **violated of our Code** or Policies may be subject to disciplinary action, up to and including termination for cause.

LEADING WITH INTEGRITY AT FERRARA

WE ARE RESPECTFUL OF EACH OTHER

“We are dedicated to advancing diversity, equity and inclusion in our workplace, because connecting and collaborating across backgrounds helps us grow. Not only as a company, but also as human beings.

When we foster inclusion by embracing the unique perspectives of others and building meaningful connections, we make better decisions, increase innovation and boost our bottom line. We also create a culture where everyone is respected and everyone can be themselves.

WE PROMOTE RESPECT



Our talented, ambitious people are a distinct competitive advantage for us. And ensuring that they have a harassment-free workplace, where individuals are treated with respect and dignity, is paramount.

We do not tolerate any conduct—verbal, visual or physical—that is inappropriate, unwelcome or directed at someone based on his, her or their protected characteristics. This includes conduct that interferes with someone’s work or creates an intimidating, hostile or offensive work environment.

It’s important that we all feel welcome at Ferrara and that we bring our best selves to work every single day. It’s the only way for us all to grow—together”.

From **Natasha Miller Williams**,
Head of Diversity & Inclusion



WE VALUE DIVERSITY, EQUITY & INCLUSION

“Our people are our most valuable asset. We see individuality, life experiences, perspectives, inventiveness, and talent as the best way to serve our consumers, partners, and communities. Cultivating a culture of diversity, equity and inclusion requires authenticity and accountability, all of which rely on our empathy and ability to be generous in our interpretations of each other.

Ferrara is committed to making the systemic changes needed to uplift our company and communities to make a positive impact on our world. Initiatives like our Diversity, Equity & Inclusion Council and Business Resource Groups bring us together to generate ideas and solutions to recruit, retain and engage our workforce, contribute to organizational strategy, innovate the best, most creative solutions, and – most importantly – to help us all achieve our goals.

As we continue to seek ways to understand, learn, and grow together, we are guided by our DE&I mission: to foster diversity and empower all employees to be authentic, share ideas, and grow. We propel the business forward through an inclusive culture where transparent, collaborative minds unite.”

Leading with INTEGRITY

“I am currently interviewing candidates to join my team.

I plan to work with Ferrara’s Talent Acquisition team to interview diverse candidates and will honor Ferrara’s commitment to equal employment opportunity and offer the position to the most qualified candidate based on knowledge, skills and ability.”

Taking Delight in INTEGRITY

Examples of inappropriate conduct may include...

- **Intimidating, demeaning or offensive remarks**, emails, photos or other printed materials
- **Racial or religious slurs** or epithets
- **Jokes, pictures, comments** or works with derogatory or sexual content
- **Unwanted** physical contact

More Bites:



Read our

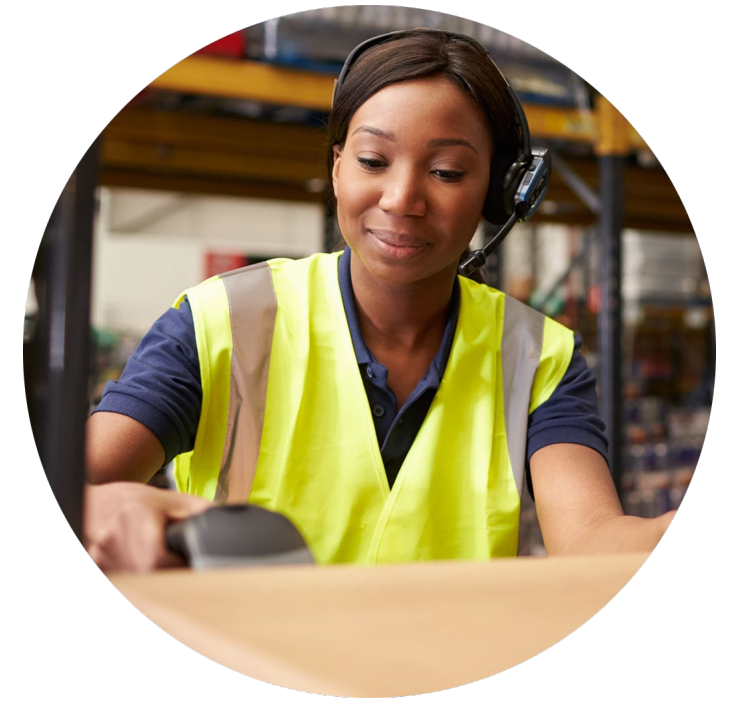
- [Anti-Discrimination & Anti-Harrassment Policy](#)
- [Environment, Health & Safety Policy](#)

WE PROTECT OUR EMPLOYEES, CUSTOMERS AND THE ENVIRONMENT

We are committed to **protecting the environment** and the health and safety of our employees, customers and communities.

Our environmental, health and safety programs aim to provide a **safe and healthy workplace** for employees, **minimize** injuries and illnesses, **reduce** Ferrara's environmental footprint and maintain regulatory compliance.

Take responsibility to maintain an **incident-free workplace**, and **report** any concerns to your managers or Ferrara's Environmental, Health and Safety Department.



Leading with INTEGRITY

"While I repair an existing piece of equipment, I notice that the machine lacks appropriate machine guarding near an employee's workstation. As a Ferrara mechanic, I proactively work with Ferrara's Environment, Health and Safety team to eliminate the potential hazard so that no employee is subject to an accidental injury."

WE DO NOT TOLERATE SUBSTANCE ABUSE AT WORK

The use of **illegal drugs** and misuse of **alcohol** or legal drugs by employees is incompatible with our commitment to provide a **safe, healthy, and secure work environment**. Performing your duties while impaired is irresponsible and could endanger your safety and the safety of others and interfere with your job performance.



WE DO NOT TOLERATE WORKPLACE VIOLENCE

Ferrara is committed to maintaining a work environment free from **intimidation, violence, or threats of violence**. Any employee who becomes aware of threats, threatening behavior, signs of potential or actual violence should report it immediately to a manager, human resources, or workplace personnel.

Weapons are prohibited on company premises, while conducting company business, and at company-related meetings or functions and in company vehicles, consistent with applicable law.

WE SUPPORT PRIVACY

Employees, and in certain instances business partners and consumers, trust us with their **personally identifiable information** (“PII”). We take our obligations to them seriously and collect, use and process any PII only for legitimate business purposes and only in accordance with our privacy policy. We protect their PII from loss, misuse, or unauthorized disclosure.

Some Ferrara employees work with PII (including sensitive PII) as a part of their jobs. If you do, **guard this information** well by following our Privacy Policy.

PII includes any information about a person that makes them personally identifiable, such as:

- Email addresses (including business email addresses)
- Street addresses
- Telephone numbers
- Employee ID numbers
- IP addresses
- Credit card information
- Financial information

Further, we **should not discuss** or disclose sensitive information about people unless authorized and necessary.

If you are not sure whether you are handling PII in accordance with our Privacy Policy, ask your manager or contact the Office of Ethics and Compliance.

More Bites:

Read our



- [Drug & Alcohol Policy](#)
- [Workplace Violence Prevention Policy](#)
- [Privacy Policy](#)

WE COMPLY WITH LAWS AND REGULATIONS

Customers, consumers, and suppliers know that they can rely on us because we comply with the laws and regulations applicable to the food industry and our company (e.g., FDA regulations, the Food Safety Modernization Act, antitrust laws, the Foreign Corrupt Practices Act, the Children’s Online Privacy Protection Act and other privacy laws).

While you are not expected to become a legal expert or be familiar with every applicable law, **you should understand the major laws and regulations** that apply to your work at Ferrara and help ensure that Ferrara complies with applicable law wherever it operates.

If you are in a jurisdiction **outside the United States** where laws or regulations seem to conflict with our Code or applicable U.S. laws or regulations, consult with your manager.

Please raise any questions or concerns with the Legal Department and the Office of Ethics & Compliance; they are here to assist you.



Taking Delight in INTEGRITY

Respect for each other, our business performance and our culture includes knowing and honoring the laws and regulations that govern our business. These include laws and regulations regarding:

- **Research and development**
- **Manufacturing and labeling** of our products
- **Promoting** and selling our products
- **Marketing** our products
- **Distributing** our products



Leading with INTEGRITY

"As a production employee, I observed a colleague violate our Current Good Manufacturing Practices Policy after she removed a cookie from the production line and ate it on the manufacturing floor. Although I like my coworker, I inform my manager about the incident because it could jeopardize the safety of our consumers and harm Ferrara's reputation."



WE MAKE FOOD QUALITY AND EMPLOYEE SAFETY PRIORITIES

We share delight in every bite! Our consumers must **have confidence in our products** in order to share them with their families and friends. So, we have a responsibility to ensure that the food we make meets the highest quality and safety standards.

We must be aware of and follow applicable laws and regulations and our company policies and procedures to **ensure that these standards are met.**

Likewise, we value our **employees and workplace safety** is paramount. Our manufacturing facilities adhere to Current Good Manufacturing Practices (CGMP) standards and follow stringent quality control procedures. We **care for and protect** the safety of our co-workers, suppliers and the public, and follow laws regarding working conditions.

Ferrara works to continually protect the health and safety of its employees, above all through **prevention**, as well as by defining and implementing adequate reference standards.

Please help us ensure that our suppliers and other business partners do the same by **reporting any concerns** to your manager, the Environment, Health and Safety Department, the Legal Department, or the Office of Ethics and Compliance.

More Bites:

Read our

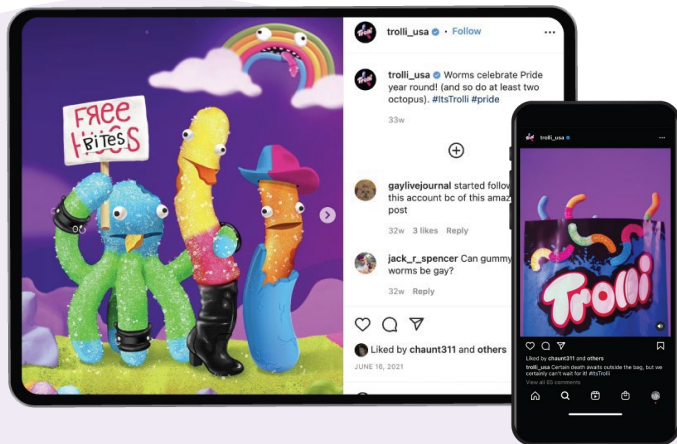


- [Good Manufacturing Practices Policy](#)
- [Safety/Quality Policies](#)
- [Food Safety Policy](#)

LEADING WITH INTEGRITY IN OUR INDUSTRY

WE PROMOTE PRODUCTS RESPONSIBLY

Consumers make the right food choices with the help of **compliant labeling** and **responsible advertising**. Ferrara self-regulates to protect consumers from false or deceiving content or claims. **Misleading marketing** erodes consumers' trust in us and can damage our brands. Ferrara has developed a **framework** for responsible advertising to ensure our product claims are substantiated and that we promote our products responsibly.



WE MAINTAIN TRUSTWORTHY BUSINESS PRACTICES

Ferrara enjoys a hard-won reputation for **honesty, integrity and fair-dealing**. This reputation for integrity is an invaluable part of our success and a competitive advantage.

Ferrara is subject to certain laws and regulations regarding business practices (e.g., antitrust and anti-bribery laws). We should ensure that Ferrara **complies** with both the letter and spirit of these laws.

We conduct our business in a **transparent and ethical manner** and comply with all applicable laws. It is never acceptable to try to influence business decisions in any way that **is unethical, inappropriate or illegal** or creates a **potential conflict of interest**. We strictly prohibit the receipt or offer of bribes and any other participation in corruption. We are honest, open and **up-front** when we interact with those who may be interested in buying or selling our products.



WE COMPLY WITH ANTI-BRIBERY AND ANTI-CORRUPTION LAWS

Accepting, offering or giving anything of value (e.g., gifts, entertainment, or other business courtesies) to **influence a business decision** or gain an unfair business advantage is improper. Doing so could have **severe repercussions** for the individuals involved, for Ferrara, and ultimately, for our community.

If you have any **questions** regarding gifts, entertainment or other business courtesies, you should consult Ferrara's relevant policies (below), the Legal Department or the Office of Ethics and Compliance.

More Bites:

Read our



- [Anti-Bribery & Anti-Corruption Compliance Policy](#)
- [Travel & Entertainment Policy](#)

LEADING WITH INTEGRITY IN OUR INDUSTRY

WE KEEP ACCURATE BOOKS AND RECORDS

We maintain **accurate** books and records. We do not **hide** liabilities, **overstate** revenues or earnings, disguise transactions, or otherwise misrepresent any financial records. We **will not violate** a policy or process for personal gain. We will keep all books and records in full compliance with all applicable laws and regulations.

Leading with INTEGRITY

"I am responsible for a facility expansion and need a particular certificate from the local government before the project can proceed. A government official asks me for a cash payment in order to expedite the certification. It is unacceptable to pay a government official a fee such as this to get things done. I refuse to make the payment and I report the incident to my manager and to our Legal Department."



WE PROTECT FERRARA'S ASSETS

We care for Ferrara's assets as if they were our own. These include **information assets** as well as **physical, electronic and financial** assets. Protecting assets from improper or careless use, destruction or disclosure is everyone's job.

We will not engage in **fraud, theft or misuse** of our assets. We protect Ferrara's assets through responsible behavior that is in line with the operating procedures established for their use and by **accurate documentation**.

Leading with INTEGRITY

"As a Ferrara sales representative, I often work in remote locations. Sometimes while waiting to meet a business partner I use my company laptop to check personal email. I mistakenly click on an email attachment that causes the computer to shut down. I call my manager, who refers me to our information technology department for assistance in safely rebooting my device and preventing any potential damage."

ELECTRONIC, PHYSICAL, AND FINANCIAL ASSETS

We protect Ferrara's electronic, physical and financial assets. We do not use such assets **carelessly or wastefully**. We use them securely and protect access to them.

Our success depends on the **integrity of our financial assets**. We all must take abundant precaution to protect such assets and keep them secure. We also **manage budgets** responsibly and do not violate Ferrara's **accounting controls** or financial policies and guidelines.

CONFIDENTIAL AND PROPRIETARY INFORMATION

Information regarding Ferrara's operations is **confidential**. We do not share Ferrara's confidential information with anyone, inside or outside of Ferrara, who is not authorized to see it. Confidential information includes, but is not limited to:

- **Business strategy**
- **Plans** and projections
- **Customer lists**; sales orders
- **Methods**, recipes or production processes
- **Interoffice communications**
- **Company financial information**
- And any information that is generally **not available to the public**.

We are also careful not to store such information or PII using **unauthorized sites** (e.g., personal email accounts).

One More Bite:



Read our [Security of Confidential Information Policy](#)

We protect Ferrara's **proprietary information**. This includes **intellectual property** (e.g., patents, trademarks, copyrights and trade secrets, which may include recipes, business methods and manufacturing processes) and other knowledge that Ferrara owns and uses to its competitive advantage in the development, manufacturing, marketing and distribution of its products.

Confidential and proprietary information is **more specifically defined** in the non-disclosure agreement you entered into upon joining Ferrara and in our Security of Confidential Information Policy.

Taking Delight in INTEGRITY

If any third-party **asks you to disclose** Ferrara's confidential or proprietary information, contact our Legal Department for assistance.

Leading with INTEGRITY

"I work in Ferrara's InTech department. A former coworker and I catch up over coffee and she asks me if Ferrara is working to innovate any new candy lines. I know about an innovative new candy product that is in the pipeline but as excited as I am to share Ferrara's plans, I know the information is proprietary so I decide not to share this information."



Leading with INTEGRITY

"My sales team colleague completed a large sale at the beginning of this financial quarter. She wonders if recording an earlier closing date for the transaction is acceptable, because she wants to meet a sales target for the earlier financial quarter. I remind her that making a false entry in our books is not only dishonest and that we have an obligation to help Ferrara maintain accurate records."

WE RETAIN ACCURATE RECORDS

We ensure the integrity of our business transactions by keeping documents and records **organized** and making sure entries are **accurate**, complete and thorough.

We store records **securely** and maintain them in accordance with our Records Retention Policy.

When our records are subject to a **legal hold order**, we are careful to keep records intact. Contact our Legal Department to learn more about legal hold orders.

More Bites: Read our
[Records Retention Policy](#)



WE ROUTE ALL PUBLIC COMMUNICATIONS THROUGH CORPORATE COMMUNICATIONS

Effective communication plays a strategic role in our internal and external affairs. Thus, we **refer all media inquiries** to Corporate Communications.

In addition, you must have approval from Corporate Communications **before** you speak or write on behalf of Ferrara.

Contact our Corporate Communications Department to learn more about our rules and guidelines regarding internal and external communications or review Ferrara's Corporate Communication Policy.

Leading with INTEGRITY

"A longtime supplier asks me whether I would perform consulting work for his company. I thank him for the offer, but decline. Even if the work is unrelated, I know how this could look to others and that I need to avoid even the appearance of an improper relationship."

WE AVOID CONFLICTS OF INTEREST

Ferrara recognizes and respects our right to engage in activity outside the workplace provided that such activity does not conflict with our obligations and loyalty to Ferrara. Put simply, **we must always do what's right!** We put our reputation for honesty and fairness at risk if we fail to do so.

Allowing a **conflict of interest** to interfere with your decision-making process can put your and Ferrara's reputation at risk. A conflict of interest may arise in many different situations, including when an employee, of any level, takes actions or has interests (personal or financial) that may **make it difficult to perform** their job functions objectively and effectively.

If you have a potential or actual conflict of interest, you must **report** it pursuant to our conflicts of interest policy.

Taking Delight in INTEGRITY

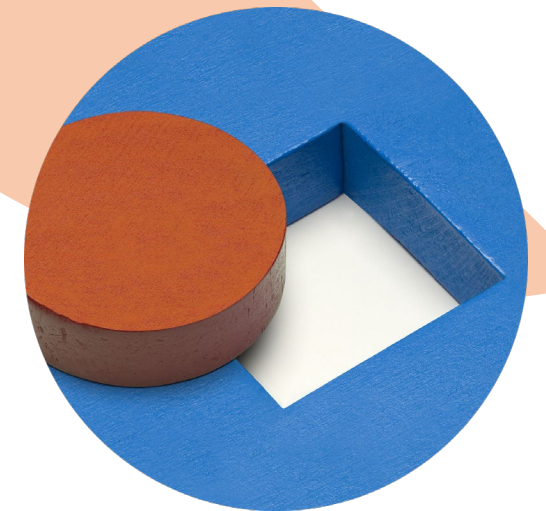
Some examples that may indicate a potential conflict of interest are:

- Hiring a vendor **owned by a close relative** to perform services or provide products to Ferrara
- Having a **financial interest** in one of our suppliers, customers, or competitors
- Having an **outside job** that could interfere with your job at Ferrara
- **Accepting gifts** from a business partner
- **Offering gifts, payments,** or favors to business partners

One More Bite:

Read our

[Conflict of Interest Policy](#)



LEADING WITH INTEGRITY IN THE MARKETPLACE

WE COMPETE FAIRLY

We **compete fairly** and within legal boundaries when we build our brands. We know that everyone benefits from a competitive marketplace, so we follow the **Antitrust and Fair Competition** laws in all locations where we operate and avoid even the **appearance** of unfairly restricting another company's ability to compete against us.

If any part of our work is regulated by Antitrust or Fair Competition laws, we **understand how they apply**. We do not enter into agreements that:

- **Predetermine prices** and sales
- **Prevent** another company from entering the market
- Facilitate any form of **bid rigging**
- **Divide markets** among competitors
- **Limit production** or sales
- **Boycott** another company



If you have any **questions** regarding Antitrust or Fair Competition laws, please contact our Legal Department.

We **gather information and business intelligence** ethically and legally. We do not seek to obtain, use or share **confidential** or commercially-sensitive information about competitors.

We **do not ask** for or use confidential information obtained through an employee's previous job and we **do not reveal** confidential information learned in a previous job or trade secrets of others.

WE DO NOT ENGAGE IN ILLEGAL BUSINESS ACTIVITY

We are careful to not engage in **illegal financial activities** (including money laundering). To avoid inadvertently doing so, we look out for **suspicious financial transactions** involving Ferrara including those that derive from an unknown source, **all-cash payments**, or payments made through a personal bank account or financial institution with no relation to the customer or business partner.

We **report** any financial requests or transactions that are suspicious to our Legal Department or Finance Department.

WE TREAT SUPPLIERS FAIRLY

Our values help us succeed. We are collaborative, and this extends to our suppliers. Our relationships with our suppliers are built on **trust, fairness and pride** in sharing delight in every bite.

We are honest and open with our suppliers. But at the same time, we encourage competitive business practices and, consistent with our obligation to make business decisions free from conflicts of interest, decision-making **without regard** to personal or financial gain.

One More Bite:

Read our
[Supplier Code of Conduct](#)



WE COOPERATE WITH THE GOVERNMENT

We are **honest and forthright** with government agencies and officials. We meet all requirements for **accurate, timely reporting** and documentation that may be required and cooperate with inspections and investigations.

When asked for information or records or to verify data that we have submitted to the government, we are **truthful and transparent**.

If you receive a government inquiry or request, you should contact our Legal Department.

LEADING WITH INTEGRITY IN THE COMMUNITIES

WE DELIGHT IN IMPROVING OUR COMMUNITIES

We strive to make a **positive impact** in the communities where we work. We give back to these communities by **partnering** with select non-profit organizations and through special initiatives. Our partnerships bring delight, hope, and opportunity to people. We **encourage our colleagues** to get involved in social and charitable programs in our communities. We work hard to engage in sustainable business practices.

WE SUPPORT HUMAN RIGHTS

We respect human rights. Full stop. Our goal is to share delight in every bite. We can only do that if we **increase** the enjoyment of human rights within the communities where we operate. We expect our employees, our customers, and our suppliers to **avoid** causing or contributing to human rights abuses.



We **spot risks and signs** of human rights violations and if we become aware of possible human rights violations, we **report them immediately** to our Manager, our Human Resources Department, Legal Department or the Office of Ethics and Compliance.

Taking Delight in INTEGRITY

Ferrara does not tolerate human rights abuses. We comply with laws and practices that prohibit:

- **Child labor**
- **Forced**, bonded or indentured servitude
- **Involuntary prison labor**
- **Human trafficking**
- **Unfair wages** and benefits

Leading with INTEGRITY

"Ferrara encourages us to participate in various volunteering events, often organized by Ferrara's various Employee Resource Groups that help our local communities. I know it is my personal decision to volunteer, but I am proud to work for a company that supports these kinds of outreach programs that make positive impacts."

LEADING WITH INTEGRITY AT FERRARA

ADMINISTERING THE CODE

Ferrara's **Office of Ethics and Compliance** is responsible for administering the Code in an objective and consistent manner, independent of the day-to-day demands of the business. The board of directors, through its audit committee, oversees the Office of Ethics and Compliance.

The Office of Ethics and Compliance reviews our business practices periodically to verify **compliance** with the Code, our Policies, and the law. These periodic reviews ensure we conduct business ethically.

ALL OF US SHOULD COMPLY WITH THE CODE

Our Code applies to **all Ferrara employees**. We also expect our suppliers and other business partners to meet the **high standards** of our Code.

WE LEAD WITH INTEGRITY

We are all responsible for setting the tone of integrity at Ferrara. If you are a leader, you are a role model. You must **lead by example** and demand that others comply with our Code. Do not tolerate inappropriate, unethical, or illegal behavior in any area of the company.

Specifically, leaders must:

- **Demonstrate** ethical behavior
- **Speak up** about unethical behavior and encourage teams to do the same
- **Promote** a commitment to ethics and compliance
- **Escalate concerns** when additional assistance is needed
- **Raise awareness** of our Code
- Maintain an **open door** for concerns
- **Resolve** ethical issues in a fair and timely manner



WE MAKE GOOD DECISIONS

OUR CODE CAN NOT TELL YOU WHAT TO DO IN EVERY SITUATION

But if you abide by the principles of the Code and our policies, your decision will likely be the right one. What do you do if you are not sure? If the right action is not clear, ask yourself:

- ***Is it consistent with our Code?***
- ***Does it align with our policies?***
- ***Is it legal?***
- ***Does it support Ferrara's goals?***
- ***If my actions appeared in a newspaper, would I feel confident about my decision?***

If you can answer “yes” to all of these questions, you are probably doing the right thing.

But if your answer is “no” or even “maybe,” then consider it a signal to stop and get advice or ask questions. It may be putting your or Ferrara’s reputation at risk. It is always better to ask before you act, especially when you are not sure.

Consult with your Manager or

- **Office of Ethics and Compliance**
- **Ethics and Compliance Hotline**
- **Legal Department**

Leading with INTEGRITY

“During a meeting, a coworker posted something that seemed inappropriate. Though I was not sure whether it violated any policy or broke the law, I believe it was distasteful. I personally like my coworker however I reported what happened to my manager because reporting these issues is what is best for Ferrara.”



CONTACTS AND HELPLINE

RESOURCE	ISSUE	CONTACT INFORMATION
Ethics and Compliance Helpline	Any issue or concern	U.S., Puerto Rico, Canada, and Mexico: 1-800-461-9330 http://ferrara.bz/ECHotline
Chief Ethics and Compliance	Any issue or concern	ethicsandcompliance@ferrarausa.com Mail: Ferrara Foundation Candy Company 404 W Harrison St, Ste 650 Chicago, IL 60607 <i>Mark envelopes: "Confidential – To be opened by the Chief Ethics and Compliance Officer only"</i>
Information Security	Any issue or concern	cyberdesk@ferrarausa.com
Human Resources	Any HR issue or concern	HR.Corp@ferrarausa.com
Legal	Any legal issue or concern	Legalnotices@ferrarausa.com Mail: Ferrara Candy Company 404 W Harrison St, Ste 650 Chicago, IL 60607 Cell: (630) 926-0161 <i>Mark envelopes: "Confidential – To be opened by the Legal Department only"</i>
Corporate Communications	Any media issue or concern	Communications@ferrarausa.com

PLEASE SIGN AND RETURN

I acknowledge that I have received, read and understand Ferrara's Code of Conduct and agree to its terms, including those of the policies, procedures and guidelines referenced in it, except where applicable laws otherwise apply. I promise to use it as a guide to acceptable behavior and recognize that making ethical choices in my work and complying with applicable laws contributes to Ferrara's culture of integrity.

I also recognize that I have a responsibility to report any known or potential violations of the Code, Ferrara's policies or procedures, or the law, to the Office of Ethics and Compliance or the Ethics and Compliance Helpline, except where laws or regulations specify otherwise. Consequences for violations may involve corrective action, up to and including termination of employment.

I understand that Ferrara does not tolerate retaliation against anyone for making a good faith report.

Signature

Printed Name

Date