



THE J.M. SMUCKER Co

**Our Commitment
to Integrity**

**OUR
CODE**

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A Message From MARK SMUCKER



OUR COMMITMENT TO INTEGRITY

For 125 years, our Company has upheld the values set forth by my great, great grandfather, J.M. Smucker. Of those values, ethics has always been at the forefront. We have always conducted our business with the highest sense of ethics. And these uncompromising ethics lead more broadly to a commitment to integrity in all we do.

Along with Our Commitment to Each Other and our Basic Beliefs, the concept of integrity has been integral to our work in refreshing our Code of Conduct, known as Our Commitment to Integrity: Our Code. Not only is integrity referenced explicitly in our Integrity Portal, where employees with concerns can share them anonymously through a third party, but it is directly tied to our Company's ethical roots.

Integrity means having a strong moral compass. It means upholding ethical standards. And, in the simplest terms, it means Do the Right Thing, which is one of our five Basic Beliefs.

When you accept a position with The J.M. Smucker Co., you commit to upholding these guiding principles and Our Commitment to Integrity. Your active role in modeling Our Commitment to Integrity allows us to foster an environment free of discrimination, harassment, retaliation and inappropriate behavior, so we can all continue to thrive together.

It takes a commitment from everyone to uphold Our Commitment to Integrity, maintain and strengthen our culture and protect our Company and each other. Thank you to our employees, our partners and all those who touch our business for continuing to act with integrity on a daily basis.

Sincerely,

A handwritten signature in black ink that reads "Mark". The signature is fluid and cursive, with a long, sweeping underline.

Mark Smucker
President and Chief Executive Officer

Our COMMITMENT TO INTEGRITY



OUR PURPOSE

At The J.M. Smucker Company, we believe life tastes better together.

Our Purpose is to feed connections—connections that help us thrive and live happy, healthy lives. Together, we are stronger and able to have the greatest possible impact on the communities around us. Thriving communities are rooted in integrity, and our Company, that integrity is defined in our **Basic Beliefs** and **Commitment** to each other.

OUR COMMITMENT TO EACH OTHER & BASIC BELIEFS

Our Basic Beliefs and Commitment to Each Other lay the foundation for future strategy plans, accomplishments, and this Code. These Beliefs guide our interactions with customers, consumers, employees, suppliers, communities, and stakeholders. Our Code exists to establish and earn the trust of all of these parties.

Our COMMITMENT TO EACH OTHER



Written by Paul Smucker in the early 1980's

"As Smucker experiences growth, we need to ensure that we retain one of Smucker's most deeply cherished goals—the mutual respect of our fellow employees and an atmosphere that makes people proud to work here. This same commitment can be enlarged to include our customers, suppliers, and stakeholders."

Here are a few basic thoughts, that when put into our everyday lives and work days, can help:

- **THANK YOU FOR A JOB WELL DONE.**
This small recognition shows that we notice and appreciate the efforts of our fellow employees.
- **LISTENING WITH YOUR FULL ATTENTION.**
By giving our undivided attention, we are showing that there is nothing more important than what is being said.
- **LOOKING FOR THE GOOD IN OTHERS.**
By seeing the good in others, we are demonstrating our respect and confidence in their intentions to do what is right, and we are developing an atmosphere where we can grow and learn.
- **SENSE OF HUMOR.**
Our work efforts are important—that is how we set the example and take the lead. Our sense of humor is also important, for that is how we maintain perspective to our work. Humor, not at the expense of others, but as a brief relief from difficult tasks, can make our working atmosphere more pleasant and enjoyable.

By keeping these thoughts in our minds every day, we can build a bridge of understanding that will nourish the atmosphere in which we work and our mutual respect for each other. I ask for your commitment to these thoughts; I ask for your commitment to each other.

Our BASIC BELIEFS

Grounded in Our Commitment to Each Other and fueled by an insatiable desire to win, we do the right thing for each other, our consumers, communities, and planet by ensuring that we:



BE BOLD

As the business environment evolves, we must be bold to maintain our competitive edge and continue to grow great brands. Being bold is the willingness to challenge the status quo. It's having the courage to take risks and use divergent thinking to find innovative, creative solutions to our business challenges.

BE KIND

Our Commitment to Each Other demonstrates who we are at our core – a “we before me” team. To us, being kind is valuing people and building relationships through trust, authenticity and fairness. And, it's supporting the growth of others and our Company through sincere, candid feedback.

DO THE RIGHT THING

Doing the right thing, and doing things right, has always been foundational to the way we do business. We expect each other to act with integrity and impeccable ethics and we demand the same of our business partners. From the health and safety of our people to the quality of our products, we hold each other to the highest possible standards.

PLAY TO WIN

Simply put, winning is fun, particularly when we succeed as a team. We win when we're collaborative internally and competitive externally. We win when we celebrate our successes and learn from our failures. Winning takes unrelenting focus, superior execution, continuous improvement and unshakable passion for our Company's growth and continued independence.

THRIVE TOGETHER

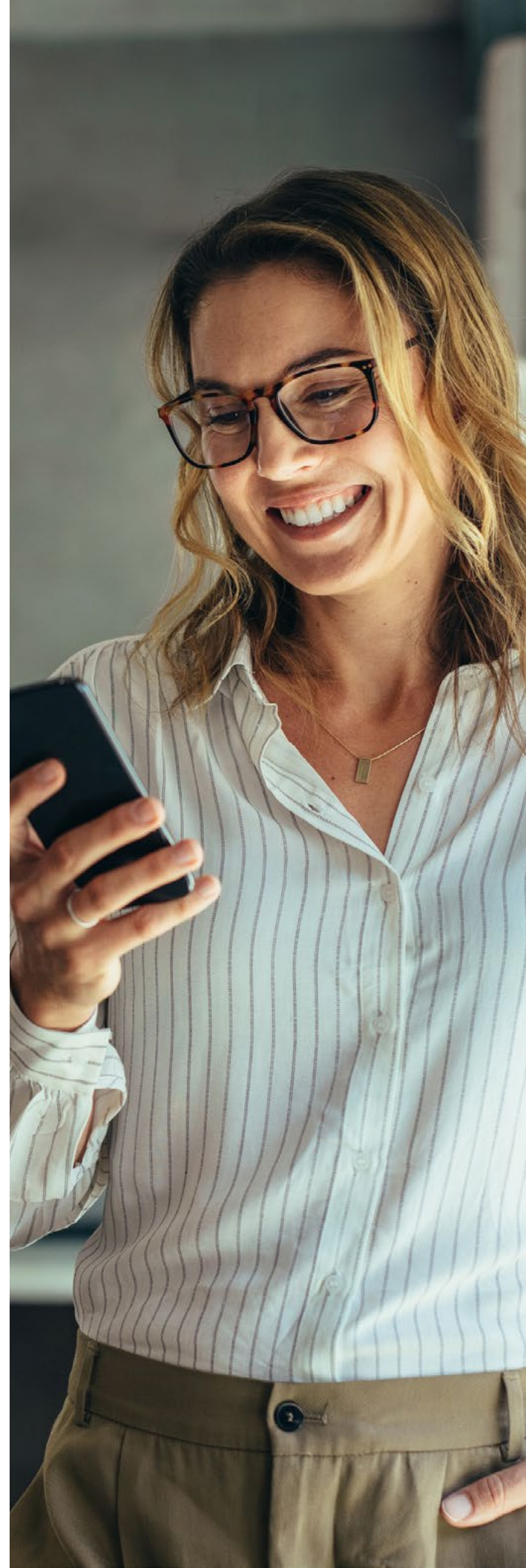
We thrive together by investing in our people, our business and our future, and by building a community that is welcoming, inclusive, diverse and equitable. Our decisions are driven by a deep respect for each other, the communities in which we work and live, and our planet.

1.1 WHY WE HAVE A CODE

Our Code of Business Ethics & Conduct, often referred to as “the Code,” reinforces our core values, beliefs, and expectations with guidelines for ethical conduct, legal compliance, and doing what is right.

Our Company is committed to compliance with all laws, rules, and regulations that govern our business and expect our employees to uphold the spirit of the Code, Company policies, and applicable laws at all times.

The Code is intended to function as a valuable tool to guide your daily conduct in the workplace and with colleagues. It is designed to help you do the right thing in any situation that may arise at work, and additional resources are referenced throughout for specific guidance where applicable.



Our Code empowers our employees to:



Uphold our Basic Beliefs to Be Kind, Be Bold, Play to Win, Do the Right Thing and Thrive Together



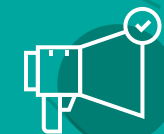
Make good decisions and act honorably—every day and in every aspect of our business



Comply with the laws, regulations, and standards that apply to our Company



Understand what our Company expects from you, while protecting our brand and reputation



Understand where and how to speak up for a better Company when concerns arise

1.2 WHO THE CODE COVERS

The Code applies to everyone at Smucker—

including our employees, officers, non-employee directors, and subsidiaries around the world. It also applies to those working with our Company— including suppliers, distributors, joint ventures, consultants, contractors, and contingent workers conducting business on our behalf.

Our Company's Board of Directors is responsible for adopting our Code, and our Ethics & Compliance Department is accountable for promoting, monitoring, and enforcing it.



1.3 WHAT WE EXPECT FROM YOU

Employees are expected to comply fully with our Code, our policies, and the law at all times. Failure to adhere to our Code can result in disciplinary action, including termination of employment. We take any violation of our Code seriously and promptly investigate and address wrongdoing in a timely, appropriate manner. Violations of law will be reported to law enforcement when applicable.

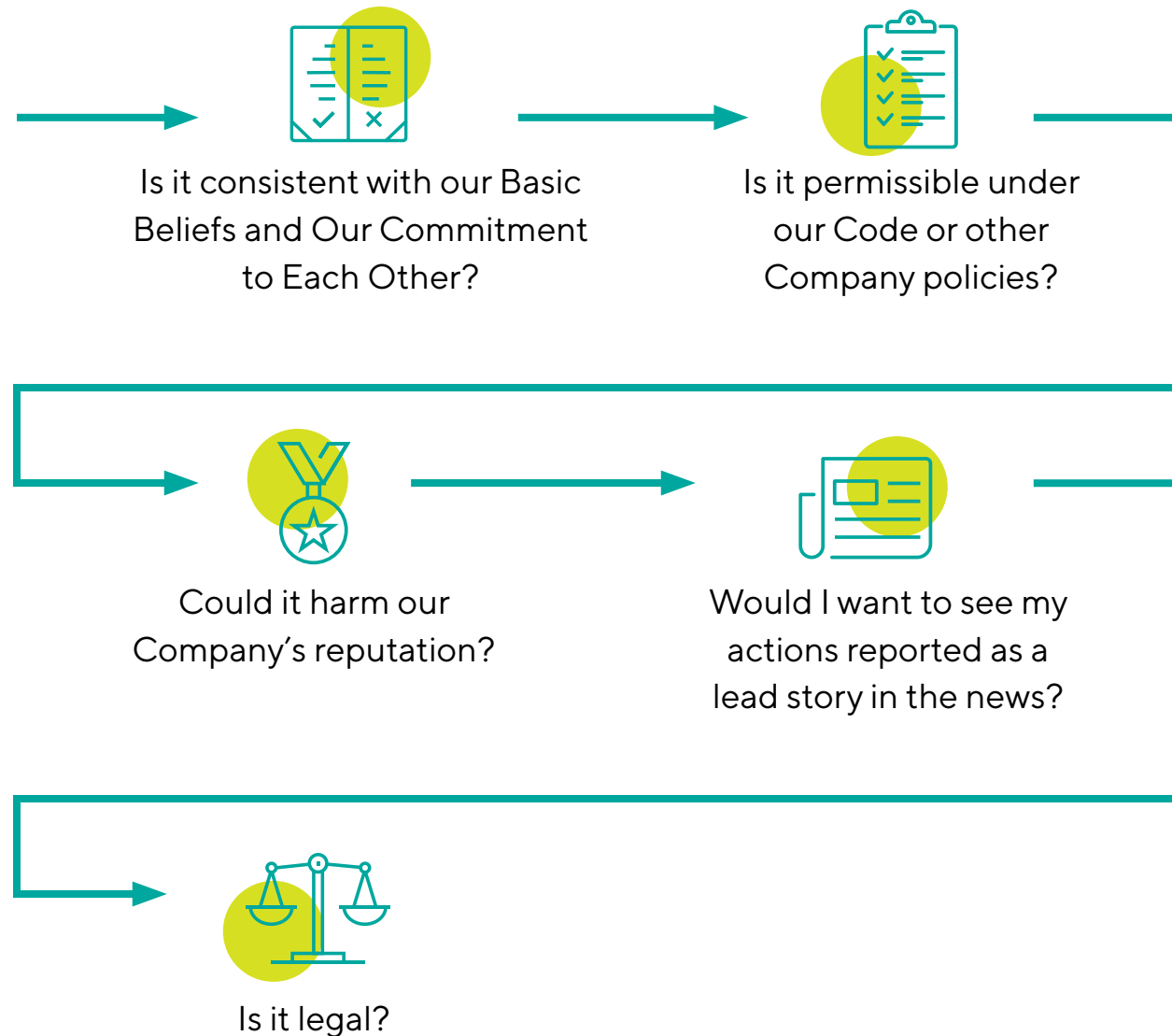
EXPECTATIONS OF HONESTY: We all have an obligation to speak truthfully and to not obstruct or interfere with any required collection of information or data. We must always act in the best interests of our Company, which includes being honest and candid, as well as cooperating with both internal and external investigations, audits, or inquiries. Further, this requires that any submissions made on behalf of our Company, whether to third parties or government agencies, are accurate and complete.

Expectations of all J.M. Smucker Company employees:

- ▶ **Read and understand our Code, along with any other Company policies**
- ▶ **Participate in required training that will help you apply our Code and its principles to your daily work**
- ▶ **Use good judgement, being honest and ethical in every action you take**
- ▶ **Ask for guidance when an answer is unclear before taking action**
- ▶ **Pay attention to any activity that is inconsistent with our Code, our policies, or the law**
- ▶ **Prevent harm to our Company and its reputation by immediately reporting concerns**
- ▶ **Promptly report potential or suspected violations of our Code or the law**

1.4 WHEN TO SPEAK UP AND RAISE CONCERNS

Our Code is a valuable tool that guides us in making the right decisions, but it cannot address every question or scenario that may arise. In any situation that leaves you with questions or unsure of the right thing to do according to our Code, policies, or the law, we ask that you **consider these questions to inform if taking action is appropriate:**



Even though something is legal, it does not necessarily mean it is ethical or in the Company's best interests. If it feels wrong—it probably is.

If you are still uncertain after asking yourself these questions, seek guidance before moving forward. Human Resources Home and your People Manager should be your first stop when seeking help.

If additional support is needed, you can also reach out to any of the other resources available to you in the [Reporting Resources](#) section of the Code.



Need to speak up?

Access the JMS Integrity Portal!

Call: 1-844-319-9352 or
Online: www.jmsintegrity.com

1.5 HOW TO SPEAK UP AND RAISE CONCERNS

Concerned? Speak up. If you experience or witness conduct that is inconsistent with our Basic Beliefs, we hope you will have the courage to speak up. The Company takes all reported concerns seriously and addresses them as promptly as possible.

There is a chance that you will experience or witness something at work that violates our Code, our Basic Beliefs, our policies, or the law. There is a chance that you won't be sure if something is in violation, but it doesn't feel right. In either event, we ask that you speak up and report it so we can make sure the matter is reviewed, resolved, and learned from for the future.

SPEAK UP





The Company Integrity Portal is an independent resource provided by a third party, that offers a safe, entirely confidential way to report concerns anonymously. All reports made through the Portal are collected by our partner, and then provided to Ethics & Compliance at the Company. When submitting a report, we encourage you to provide your contact information so Ethics & Compliance can follow up with you as needed to ensure the issue is addressed effectively. If preferred, you can submit a report anonymously, with confidence that your identity and contact information will be protected.

The Company Integrity Portal is different from other reporting methods for several reasons:

- Anonymous reporting
- Computer IP addresses are not tracked; phone numbers are not logged
- Managers are not informed when employees utilize the Integrity Portal
- Option to communicate verbally or in writing in over 25 languages
- Available 24/7, 365 days/year, by calling 1-844-319-9352 or online at www.jmsintegrity.com

When you raise concerns, you help the Company improve, and create opportunities to better educate, train and support our employees that allow us to thrive as a company.

We strive to cultivate an open-door culture, so employees feel comfortable discussing issues with your People Manager or a Company Leader. If you are not comfortable discussing an issue with one of these individuals, or if one of these individuals is involved in the issue at hand, you can report your concern to a member of Employee Relations, Ethics & Compliance, Human Resources or through our [Integrity Portal](#).





What to expect.

Once your concern is received, it will be promptly reviewed and, if necessary, investigated by a team with appropriate subject matter expertise. Information you provide will be shared only with people who need to know it to resolve the issue. If the concern is substantiated, the HR department will make a recommendation to the individuals' manager regarding what, if any, disciplinary action is needed. The reporter will be notified when the matter is resolved, although details of the outcome will likely not be shared in order to protect the confidentiality of the investigation.

How to access your submission

When you submit a report, you will be asked to create a password, and will be given a randomly generated access code. This access code can be used to check the status of your report at any time, over the phone or online.

How we protect you from retaliation.

The Company does not allow any form of retaliation against anyone who reports a concern or cooperates in an investigation. If you believe you have been retaliated against, reach out to the HR department, the Employee Relations department, the Ethics & Compliance department, or the [Integrity Portal](#).

For matters involving Accounting, Internal Accounting Controls, or Auditing irregularities and concerns, you also have the option to contact the **Audit Committee** of our **Board of Directors**. You can specify this in the Portal or reach out to the Audit Committee by mail at:

Audit Committee Chair
One Strawberry Lane
Orrville, OH 44667

1.6 HOW WE PREVENT RETALIATION

You—our employees—are the eyes and ears of our Company, and we value your help in uncovering possible misconduct.

Our Company culture must be one where every employee is responsible for consistently challenging each other to do better.

We strictly prohibit retaliation or threats of retaliation against anyone who reports a concern, cooperates in an investigation, or assists someone in reporting suspected inappropriate behavior.

Everyone at Smucker should feel safe speaking up and raising concerns without fear of retaliation, and we are committed to protecting that expectation.

Retaliation can take many forms and it is not always obvious. Retaliation is a serious violation of our Code, and in many cases, against the law. Anyone who engages in retaliation will be subject to disciplinary action, up to and including termination of employment.

Find out More:

[Policy Against Retaliation](#)

Common examples of retaliation include:



Isolating an employee from professional or social activities



Avoiding an employee



Transferring an employee against the employee's wishes



Demoting an employee



Firing an employee



Making derogatory comments to or about an employee



Exerting pressure and influence, including, but not limited to, discouraging a complaint/report or participation in an investigation

1.7 THE ROLE OF OUR PEOPLE MANAGERS

Our leaders and people managers play an important role in our success and have an additional responsibility under our Code to lead by example.

Our people managers are expected to regularly emphasize the importance of our Basic Beliefs as we strive for continuous improvement as an organization.

Find out More:

[All Employee Expectations](#)
[People Manager Resource Library](#)



People Managers are expected to:

- Promote and foster a positive and inclusive work environment
- Understand responsibilities under our Code, policies, and laws applicable to our business
- Discuss our Code with employees and ensure they understand their responsibilities
- Monitor employee performance under our Code while rewarding excellence and addressing challenges
- Create an open environment where employees feel safe asking questions and raising concerns
- Respond to questions and concerns promptly; when in doubt, seek guidance
- Never retaliate or tolerate retaliation against employees who speak up or raise concerns
- Execute your people manager role expectations as detailed in the People Manager Objective
- Regularly emphasize the importance of our Basic Beliefs as we strive for continuous improvement



1.8 HOW WE KEEP OUR CODE CURRENT

Our Code undergoes a review once every two years to determine if changes need to be made to reflect the present state of our business and world.

Any material changes to the Code must be reviewed and approved by our Board or Directors (or its designated committee) and promptly disclosed to shareholders in accordance with applicable laws and regulations. For non-material changes to our Code, our Chief Legal Officer is authorized to make such changes without additional Board of Directors review. Any significant changes will be communicated to employees in a timely manner, while the updated Code

is made available on our Company's intranet and external site.

All employees are invited to help the Company continuously evolve and improve. If you have feedback on our Code or believe a section needs to be updated, please contact the Ethics & Compliance Department at Smucker.Ethics@jmsmucker.com.



THE J.M. SMUCKER Co.

Our COMMITMENT TO EACH OTHER



2.1 TREATING OTHERS WITH RESPECT

We know that great ideas grow where unique perspectives meet, and we strive to provide a safe and respectful environment where all individuals can thrive together. We do this through treating each other with consideration, listening with our full attention, and taking ownership of our personal conduct.

We are committed to a positive and respectful work environment for all, and we strive to make all employees proud to work here. It is through an inclusive and diverse workforce— one free from discrimination and harassment—that we are able to strengthen our Company and enable each employee to reach their full potential.

2.2 EMBRACING INCLUSION, DIVERSITY & EQUITY

Our greatest asset is our People. We celebrate the unique aspects of each employee and are strengthened by the diversity of backgrounds and perspectives each person brings.

We are committed to maintaining a workplace where all are treated with dignity and respect.

Each of us is responsible for helping foster an inclusive and diverse workplace free from discrimination—one where all can thrive.

We are committed to fairness and equal opportunity in employment decisions.

Only job-related qualifications should affect decisions about hiring, promotions, compensation, development, discipline, dismissal, and other aspects of employment at the Company.



We do not tolerate discrimination against anyone, including current employees, prospective employees, or business partners, based on any of the following factors:

-  Age
-  Veteran or military status
-  Race, color, or ethnicity
-  Marital or registered domestic partner status
-  Ancestry, national origin, or nationality
-  Political preference
-  Sex or gender identity or expression
-  Results of genetic testing
-  Sexual orientation
-  Any other characteristics protected by the law
-  Disability, medical condition, or pregnancy
-  Religion or religious creed

- Q** : You are interviewing candidates for an open position. One candidate is the most qualified person for the position based on various factors and is also seven months pregnant. The maternity leave will occur during a particularly busy time of the year. Can you decline to offer her the position solely because she is pregnant?
- A** : No, hiring decisions should never be based on an individual's protected characteristics, including pregnancy.

2.3 RESPECTING HUMAN & WORKPLACE RIGHTS

We abide by all labor, wage, hour, and relevant employment laws, and are committed to compliance with all international human rights principles. We do not use, or permit use of, any form of slavery including involuntary labor, forced or prison labor, child labor, or human trafficking.

We promote and respect human rights across our entire value chain. From plant workers in Buffalo to farmers in Colombia, everyone touched by our business should be treated with dignity, fairness, and respect. Likewise, as described in our **Company's Global Supplier Code of Conduct**, our suppliers must abide by these laws and principles as well. We will never knowingly do business with any party that violates employment laws or engages in human rights abuses. We also expect our suppliers to source responsibly, monitor their suppliers, and assure compliance with these standards and expectations.



Find out More:

[Policy Against Trafficking of Persons & Slavery](#)
[Global Supplier Code of Conduct](#)
[Recording Work Hours Policy](#)

Q



You read a social media post about one of our vendors. The posting suggested that they may have been involved in an issue related to unfair labor practices. Should you take any action?

A



Yes. We hold our vendors accountable to our high standards, and if there is any suspected improper or illegal behavior, you should report it through one of the other channels described in the **Reporting Resources** section of our Code. Even if there is no direct connection between the allegations and the work they do with us, the Company should be alerted so we can evaluate how it might affect our relationship.

Q



When a coworker was selecting a vendor, he found one that had significantly lower costs. You looked into it and found evidence of questionable labor practices. How should you handle this?

A



Anything that harms people or the environment is inconsistent with our Company's values and our commitment to doing things right. Tell your coworker what you found to assist in his or her decision making and elevate the conversation if necessary.



Our COMMITMENT TO SAFETY

3.1 WE MAINTAIN A SAFE AND HEALTHY WORKPLACE

We all deserve to work in a safe, healthy, secure, and drug-free environment, and we are committed to providing a workplace where health, safety, and compliance with all applicable laws and regulations is a top priority.

Maintaining a safe workplace is top priority at Smucker.

We do this using “best manufacturing practices” and by complying with Occupational Safety and Health Administration (OSHA) and other federal and state health and safety laws. Following Company policies keeps our workplace free of hazards, violence or the threat of violence, and free of individuals under the influence of a controlled substance.

We need every employee's constant attention to safety to help us maintain an injury and illness-free workplace. **Stay focused and remember to:**

- ▶ **Comply with all health, safety, and environmental laws and regulations that apply to our business**
- ▶ **Participate in all training and safety programs required for your job**
- ▶ **Start work only if there are no apparent hazards and you are fit and alert to do your job safely**
- ▶ **Wear personal protective clothing and equipment whenever required**
- ▶ **Ensure that all machines are operating properly**
- ▶ **Comply with the Company's Drug Free & Substance Abuse, Workplace Violence Prevention and Weapons Policies**
- ▶ **Stop work immediately if a hazard arises**
- ▶ **Stay alert and report potential hazards to your manager immediately, along with workplace illnesses, injuries, violent acts or threats**
- ▶ **Know your local emergency procedures**

Q

You notice that a machine is making an unusual noise but is still working. You are concerned about the safety of employees if the machine should malfunction. However, you know the plant maintenance and repair expenses are already over budget for the year. What should you do?

A

You should report the problem immediately to your Manager or the Plant Manager. Your safety and the safety of your coworkers is more important than any cost management initiatives.



3.2 PROHIBITING WORKPLACE VIOLENCE

We can only thrive together if we feel safe together. Our Company prohibits threatening and abusive behavior, as well as acts or threats of violence by or against employees and business partners in the workplace. Together, we can prevent this activity through vigilance and a commitment to protect our Company and each other. It is never acceptable to cause others to fear for their safety.

What this includes:

- Do not hit, shove, fight, provoke a fight, or use any type of physical violence during work hours or on Company property
- Do not use intimidating language or make verbal or physical threats, including threats to harm someone's family, friends, or property
- Do not harass or use phone calls, e-mails, text messages, or letters to threaten an employee at home or in the office
- Do not bring firearms or other weapons, whether or not you have a permit to carry, into any Company facility or property, including parking lots
- Do not destroy an employee's or the Company's property
- Do not stalk or engage in unlawful or unauthorized surveillance

Find out More:

[Workplace Violence Prevention Policy](#)
[Weapons Policy](#)



Q



You notice a colleague's behavior has changed. Recently, this individual, who is usually very outgoing and friendly, has become much quieter, without much of an apparent reason. You've started to see another shift happening - from quiet to angry.

A



There are three different ways you can respond. If the behavior change seems minor, you may want to continue to watch for additional behaviors. If the attitude persists, you may consider talking with the person directly by asking how they are doing. If the behavior change seems significant, you should consider reporting this to a supervisor, security, or Human Resources/Employee Relations. Remember, you are trying to help by providing support to the employee.

3.3 PROHIBITING HARASSMENT, BULLYING, OR ABUSIVE CONDUCT

We are committed to maintaining a safe and positive workplace environment—free of harassment, bullying, or abusive conduct.

Each of us is responsible for upholding this commitment and doing our part to prevent this conduct in the workplace. Remember that harassment—sexual or otherwise—is determined by your actions and how they impact others, regardless of intentions.

If you or someone else is the subject of harassment, bullying or abusive conduct, report it! Stated simply, we have a zero-tolerance policy against this conduct in any form, and will take swift action to investigate and address wrongdoing in an appropriate manner.



If you are being harassed, or know someone who is, report it!

Access the JMS Integrity Portal!

Call: 1-844-319-9352 or

Online: www.jmsintegrity.com

While the legal definition of harassment may vary, the Company considers the following behaviors unacceptable at any time:

- Any form of harassment, including sexual harassment
- Offensive language, jokes, or degrading comments
- Racial, ethnic, gender, or religious slurs
- Bullying, intimidating, or threatening behavior

Find out More:

[Anti-Harassment Discrimination Policy](#)
[Equal Employment Opportunity Policy](#)

Q :

A coworker has complained to me that another employee is making unwelcomed sexual advances towards her, and she is uncomfortable. It is making it hard for her to work, but she is afraid to confront him or report it. Should I report my coworker's concerns?

A :

Yes, the conduct could be inconsistent with our Basic Beliefs and other Company policies, including the Anti-Harassment & Discrimination Policy and this Code. You should report it even if your coworker is afraid to do so. We are all individually responsible for fostering and maintaining a positive work environment—and that includes reporting conduct that is inconsistent with that objective and Company policy.

3.4 PROHIBITING DRUG & ALCOHOL USE

It takes clear thinking to deliver the best results and to maintain a safe and healthy work environment.

Because we depend on each other to perform at our best, we prohibit all employees from working under the influence of drugs or alcohol on the job.

When it comes to drugs:

Whether on Company property or in a vehicle used for business, it is prohibited to use, possess, sell, buy, be under the influence, or offer drugs to others. Be aware of the possible side effects from any legal medications as well, including prescription medications and over-the-counter drugs. You must speak with Human Resources before performing any work if the side effects may impair your judgement, performance, safety, or the safety of others.

When it comes to drinking:

Similarly, working under the influence of alcohol is prohibited. However, drinking alcohol in moderation may be allowed at some meetings and events sponsored by the Company. It is your responsibility to monitor and control your consumption of alcohol when participating in Company activities or sponsored social events.

Drug Tests:

During your employment, you may be required to take a drug or alcohol test, and to stop working if you are perceived to be under the influence of any drug or medication. If your performance or anyone's safety is compromised by your substance abuse, you will be subject to disciplinary action up to and including termination of employment.



Find out More:

[Drug-Free Workplace & Substance Abuse Policy](#)

Q



At your plant's annual barbecue, you see your plant manager drink a few beers. An employee comes to the barbecue with news of an emergency inside. Your manager seems unsteady on his feet as he starts walking back into the plant to help. What do you do?

A



Stop him and ask him to stay at the barbecue. Notify the next level plant Manager for guidance or call security if you are not authorized to handle the emergency yourself.

Our COMMITMENT TO DOING THE RIGHT THING



4.1 ADVERTISING, MARKETING & LABELING OUR PRODUCTS TRANSPARENTLY

At J.M. Smucker, we pride ourselves on cultivating a culture of transparency.

In line with that, everything we communicate to our customers, consumers, government agencies and the public must be accurate, including our product labels, advertising, and all other communications.

We are committed to being accurate and transparent with our consumers and aware of all advertising laws and regulations. Products should not be advertised in a manner that communicates anything that is false or misleading. This includes statements about our products that could be misinterpreted. We exercise extra care in advertisements and media that may be seen by younger audiences, including children.



Need to speak up?

Access the JMS Integrity Portal!

Call: 1-844-319-9352 or

Online: www.jmsintegrity.com

By advertising, we mean:



Advertisements
(print, radio, television,
e-commerce, web, etc.)



Social Media/networks
(posts, banner ads, re-
shared content)



Product websites and
e-commerce



Branded content
(product placement,
product integration)



Coupons (free-standing
inserts, in-store
coupons, etc.)



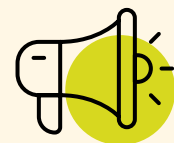
Point-of-sale materials



Publicity
(press releases, events,
sponsorships, etc.)



Sell sheets



Endorsement content
(spokesperson content,
influencer content, user-
generated content shared
to brand pages and reviews)



Any time we make claims regarding our products, we must rely on solid documented evidence that is collected in an unbiased and statistically valid manner. Visual depictions must accurately reflect the nature of our products. Any comparisons to our competitors' products must be true, fair, and substantiated.

Q :

You are working on an ad campaign for a product, intending to compare ingredients in one of our products with a competitor's product. Can you "suggest" in the ad that the competitor's product does not contain wholesome ingredients, even if you do not say it directly?

A :

No. We must be able to substantiate any claim that we make in our ads, and this includes both express claims and claims that may be implied (i.e., the net impression of the ad, or "takeaway"). If we cannot back up all claims— both express and implied — with evidence, we cannot include the claim in an ad.

4.2 UPHOLDING HIGH STANDARDS FOR FOOD SAFETY & INTEGRITY

Our purpose to feed connections is rooted in the core of our business - food.

Operating in food manufacturing and marketing means that regulations by federal, state, and local governments regarding food production, labeling, advertising, sale, and distribution of food are of paramount importance to us, and we are committed to complying with these standards.

Our reputation is built on the quality of our products and the trust of our consumers and customers. As such, we must always produce and sell quality products that are safe for our consumers. We have strict controls in place to fulfil our commitment to delivering premium products that meet the highest standards of quality. We expect our suppliers and business partners to uphold those standards as well.

If your role and responsibilities involve the production, labeling, advertising, sale, or distribution of food, you are expected to:

- ▶ **Strictly adhere to our production and quality control procedures;**
- ▶ **Ensure that our products are accurately labeled; and**
- ▶ **Understand and comply with all applicable laws, regulations, and our Company policies for the storing, handling, production, labeling, advertising, sale, and distribution of our products.**



If you learn of a product safety or quality issue or have a product quality concern, immediately report it to your Manager, our Vice President of Quality Assurance, or other channels described in the [Reporting Resources](#) section of our Code.

Q



Quality Assurance reports to you that a production run, due immediately to a major customer, has a slightly off flavor. You learn a very small amount of food grade oil inadvertently contaminated the product. It is harmless and cannot be detected by most people. You report the problem to your manager, who seems to ignore the information and orders you to complete the run to meet production goals and the delivery timeline. What do you do?

A



You should elevate the issue through one of the other channels described in our [Reporting Resources](#) section of our Code. One reporting option would be to your Plant Manager, who may be best equipped to take prompt action.

Our COMMITMENT TO ETHICS



5.1 AVOIDING CONFLICTS OF INTEREST

We must always do what is in the best interest of our Company. We win when we make business decisions solely on our principles of sound business judgement. This can only be accomplished when we take steps to avoid conflicts of interest. We all have interests and relationships outside of our jobs, and we all have a responsibility to recognize when our personal activities create— or appear to create— a conflict between our personal interests and the interests of our Company.

Conflicts of interest:

A conflict of interest occurs in situations when your personal interests interfere, or appear to interfere, with the interests of your Company. Conflicts can arise when you take actions or have personal interests that make it difficult for you to do your job or make decisions objectively on behalf of our Company. They also arise when you (or members of your family), receive improper personal benefit based on your position at our Company, or you take advantage of corporate opportunities for your own personal gain.

Some other common examples of where Conflict of Interest can arise:



Competing with our Company



Conducting business with family and friends



Doing business with customers, suppliers, and competitors



Giving or receiving gifts and hospitality



Outside employment and board service

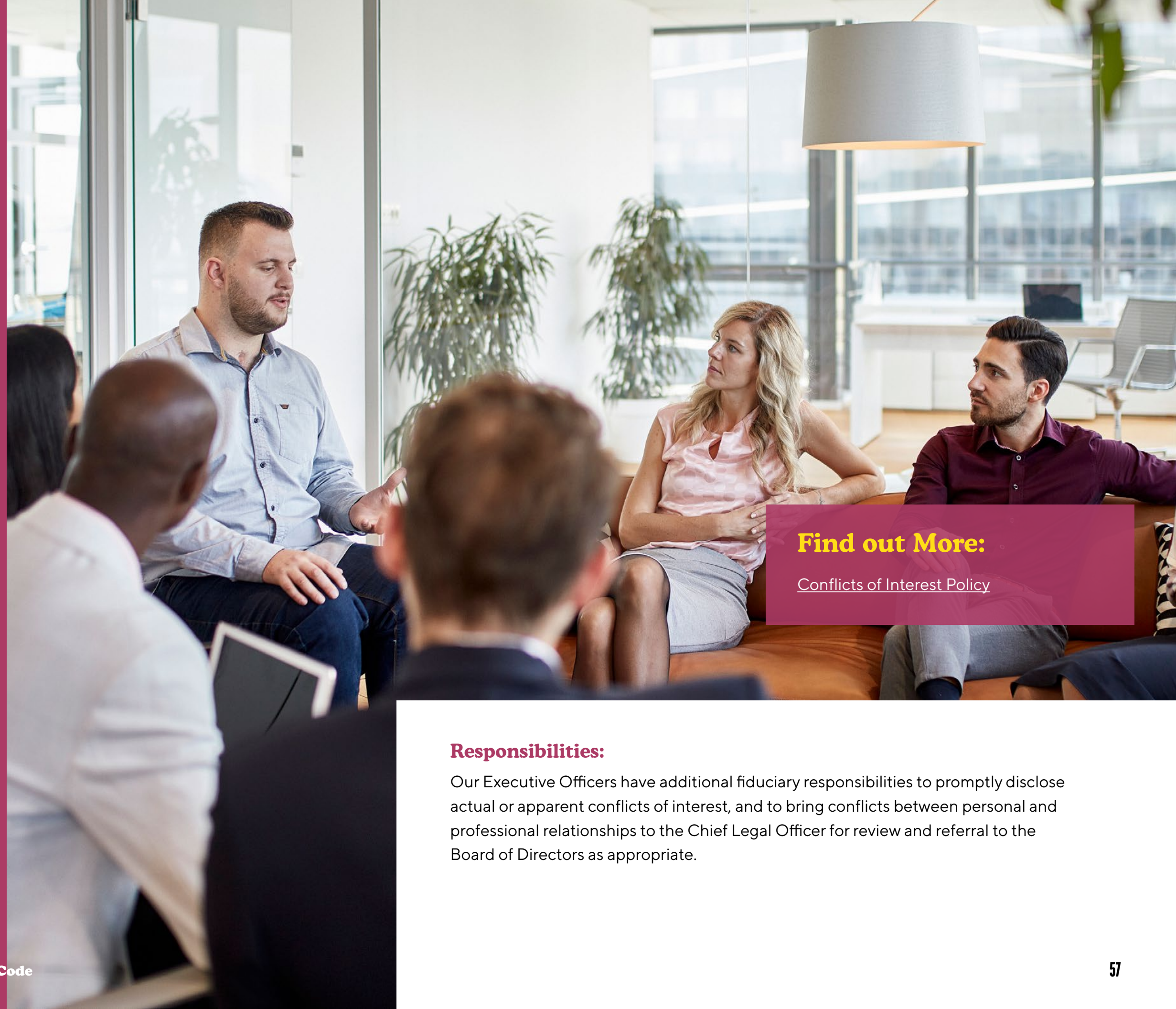


Outside investment in competitors, customers, and suppliers

This list is not inclusive of every situation where a conflict can arise. In fact, conflicts can surface in any situation where your personal interests influence, or appear to influence, your decisions or actions that are not in the best interest of the Company.

Handling a conflict:

While not every conflict of interest will become immediately obvious, all of us have a responsibility to recognize when a conflict arises, to disclose it promptly, and to take action to resolve it in a timely and appropriate manner. All employees are expected to understand and comply fully with our [Conflict of Interest Policy](#), which includes disclosing any actual or potential conflicts of interest via the [Disclosure Form](#).



Find out More:

[Conflicts of Interest Policy](#)

Responsibilities:

Our Executive Officers have additional fiduciary responsibilities to promptly disclose actual or apparent conflicts of interest, and to bring conflicts between personal and professional relationships to the Chief Legal Officer for review and referral to the Board of Directors as appropriate.



5.2 GIFTING RESPONSIBLY

It is essential that we conduct our business with honesty and integrity, especially when it comes to giving and receiving gifts and hospitality. Caution must be used to avoid situations that could interfere— or appear to interfere— with your responsibilities to our Company. In some instances, the exchange of gifts, meals, or hospitality may be prohibited altogether.

For example, when dealing with a government official, these exchanges may be illegal and are prohibited.

In general, you may only offer or accept gifts that are:

- **Lawful, unsolicited and infrequent;**
- **Not dependent on you doing or promising to do anything;**
- **Not cash or cash equivalents such as gift cards; and**
- **Nominal in value.**

Nominal gifts:

When gifts are being offered or accepted within the United States, we consider a gift to be nominal if it is valued at \$ 75.00 USD or less. When gifts are being exchanged internationally, seek guidance from the Ethics & Compliance Department prior to giving or accepting any gifts to assure it does not violate any global laws and to determine acceptable limits under our policy.



Q

A supplier is hosting an annual client conference, and you are invited as a representative of the Company. When you arrive, you receive a gift bag, filled with golf balls and tees printed with the supplier's logo. Can you accept the gift bag?

A

Yes, you can, as this is a nominal gift and meets all the criteria of the policy.



Q

ABC Company is selected as one of our new suppliers. Representatives from ABC Company are in town and offer to take several Company employees to dinner. What do you do?

A

Because ABC Company is now a supplier, and representatives of both companies are present, the dinner could be viewed as helping the new working relationship to develop. In this case, it is acceptable for the supplier to pay for the meal, assuming the cost is reasonable and the setting is appropriate.

Meals and Hospitality

You may accept occasional hospitality from business partners if an event is attended by the business partner and the costs involved are reasonable and customary. If the meal or the event is not attended by the business partner, it is considered a gift.

When offering meals or hospitality to our business partners, you should follow these same guidelines by attending the meal or event and ensuring that the costs are reasonable, customary, and in compliance with our [Business Travel & Expense Policy](#).

For example, if you are invited to a special event involving out-of-town travel or an overnight stay to a premium event such as the Olympics or the Super Bowl, consult with your manager and the Ethics & Compliance Department for approval in advance of attending to determine if there is an acceptable business purpose for your participation. The general guidance is that vendor sponsored travel is permissible so long as costs are reasonable and customary, there is a business purpose, and there is no undue influence or conflict of interest.

Refusing a gift, meal, or entertainment that exceeds our stated limits may be difficult, but you should politely decline and explain our policy. If you are unable to return the gift for any reason, contact the Ethics & Compliance Department for guidance.



Gifts and Hospitality – Use of Company Funds

Giving gifts or hospitality with Company funds and resources to employees or others outside the Company may create potential legal and/or financial implications for the Company, including tax liabilities. Before committing Company funds, discuss the matter with your manager for guidance and disclose it to Finance for accounting, if applicable.

5.3 PROHIBITING BRIBERY & CORRUPTION

At the J.M. Smucker Company, we compete based on the value of our products and integrity for our people.

Therefore, we never tolerate illegal or unethical conduct under any circumstances. You are responsible for always understanding and complying with our Company's [Policy Against Bribery & Corruption](#).

Smucker strictly prohibits any form of corruption in our business, including bribery and kickbacks, and employees must never—directly or indirectly—offer or accept any form of payment, or anything of value intended to influence a business decision, gain a business advantage, or for personal gain.

Bribes:

Anything of value offered or given to improperly influence a business decision or secure an unfair business advantage. Anything of value is not limited to money, and can be in the form of gifts, hospitality, favors, offers of employment, donations, political contributions, or anything where the recipient perceives value.

Kickbacks:

Personal payments that are given or received illegally, to secure a favorable outcome in a business transaction or setting.



Bribes, payoffs, and kickbacks are never acceptable under our Policy and are illegal in most countries. This includes bribes and kickbacks in commercial business settings and those that can arise when doing business with governments and government officials. Participating in these types of prohibited activities can create significant risk for you and our Company, including imprisonment, severe monetary penalties, and reputational damage.



Strict laws exist to prevent bribery and corruption when doing business with foreign governments and officials. For example, the United States has adopted the Foreign Corrupt Practices Act, which prohibits bribes to officials of non-US governments. Similar anti-bribery and anti-corruption laws exist in many countries where we do business, and those laws apply to us as well. Refer to our [Policy Against Bribery & Corruption](#) for more information regarding these prohibitions and responsibilities when doing business with foreign governments and officials.



Government officials include any officer, employee, or person acting on behalf of:

- **A government or one of its departments or agencies**
- **A public international organization**
- **A government-controlled or state-owned entity**
- **A political party official or political candidate**
- **Members of a royal family**
- **Spouses or immediate family members of any of the above**

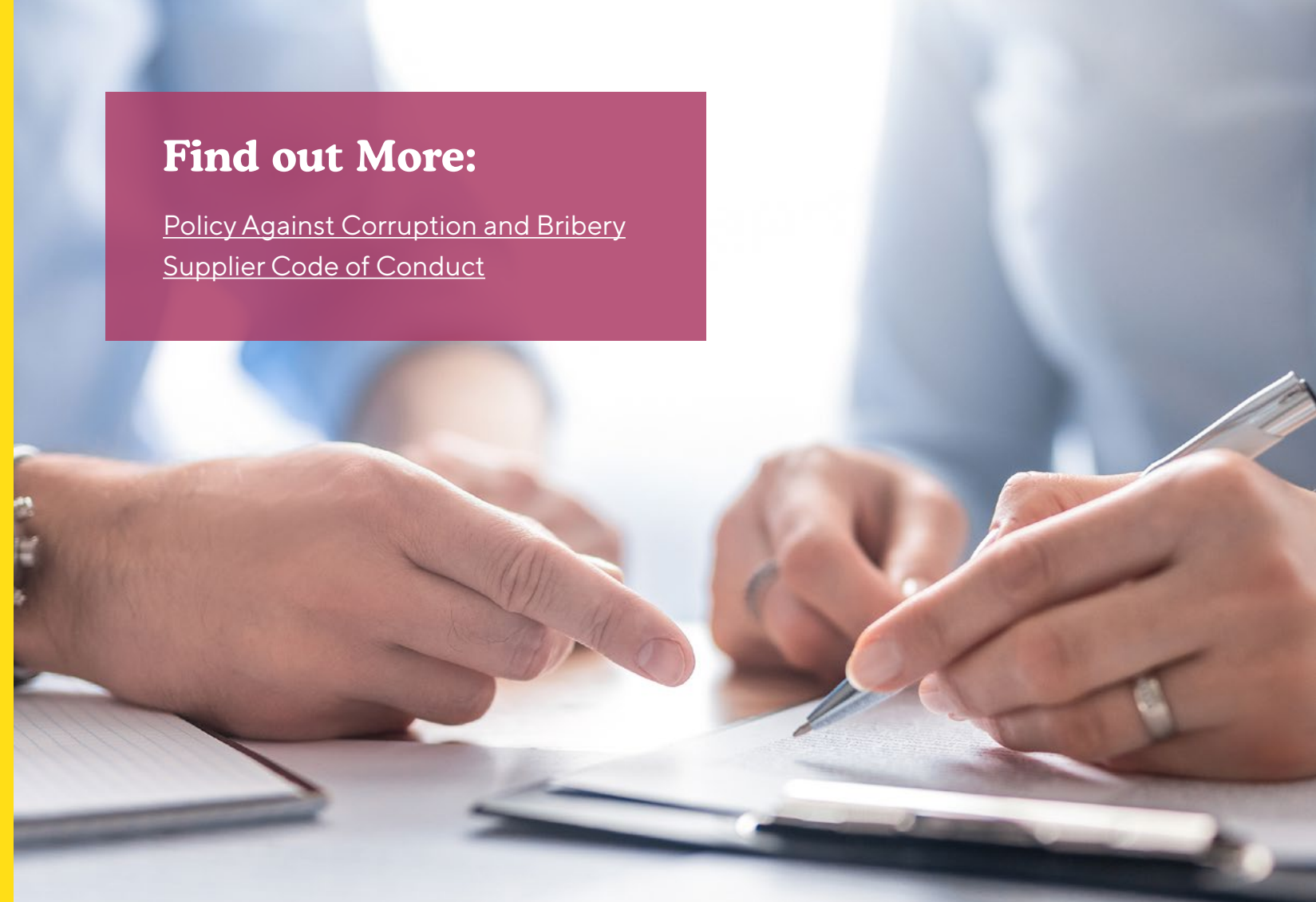
Third party liability:

Many anti-bribery and anti-corruption laws may also impose liability on our Company for the actions of our suppliers, distributors, and other third parties that are working on our behalf. If you are responsible for selecting or supervising a third party, please be mindful that:

- **You are responsible for performing due diligence, as required by our Policy Against Bribery & Corruption, including identifying any red flags.**
- **You cannot use a third party to make improper payments or provide anything of value to a foreign government official to obtain a business advantage.**
- **Our suppliers and vendors may be owned by a foreign government. Employees of these companies are typically considered foreign government officials.**
- **You should closely monitor expenses and activities of third parties doing business in foreign countries to reduce anticorruption risk.**

Find out More:

[Policy Against Corruption and Bribery](#)
[Supplier Code of Conduct](#)



Q



You have gotten to know a person who is not a citizen of the United States well over the past year. He asked if you could help his daughter find a summer job in the United States. If you just gave him the lead, and he did the work, is that acceptable?

A



It may not be. Actions like this have led to anti-corruption violations. This can be considered an improper favor for a foreign government official. Even though it seems harmless, it may be a violation of the law. Check with the Ethics & Compliance department before engaging in this type of conduct.



5.4 PROHIBITING MONEY LAUNDERING & TERRORIST FINANCING

Conducting business responsibly requires constant vigilance. It is the job of each of us to know who is on the other side of every transaction to prevent criminal activity like money laundering and terrorist financing. The same techniques used to launder money can be used to conceal the sources and forms of terrorist financing. To avoid both, Smucker does business only with reputable third parties involved in legitimate business activities.

Money laundering:

The act of making criminally obtained money appear to come from a lawful source.

Terrorist financing:

The act of financially supporting terrorism, whether purposefully or unknowingly.

WARNING SIGNS

Avoid improper financial transactions by steering clear of suspicious deals, such as those that involve:

Attempts to pay Smucker in cash or money orders

Payments in currencies other than the currency on the invoice

Payments made by someone who is not a party to the contract

Unusually favorable payment terms

Requests to ship to a different country from where payment originates

Attempts to avoid reporting or record keeping requirements

Requests to make an overpayment



If you spot unusual or suspicious activity, report it immediately

5.5 DEALING FAIRLY WITH OTHERS

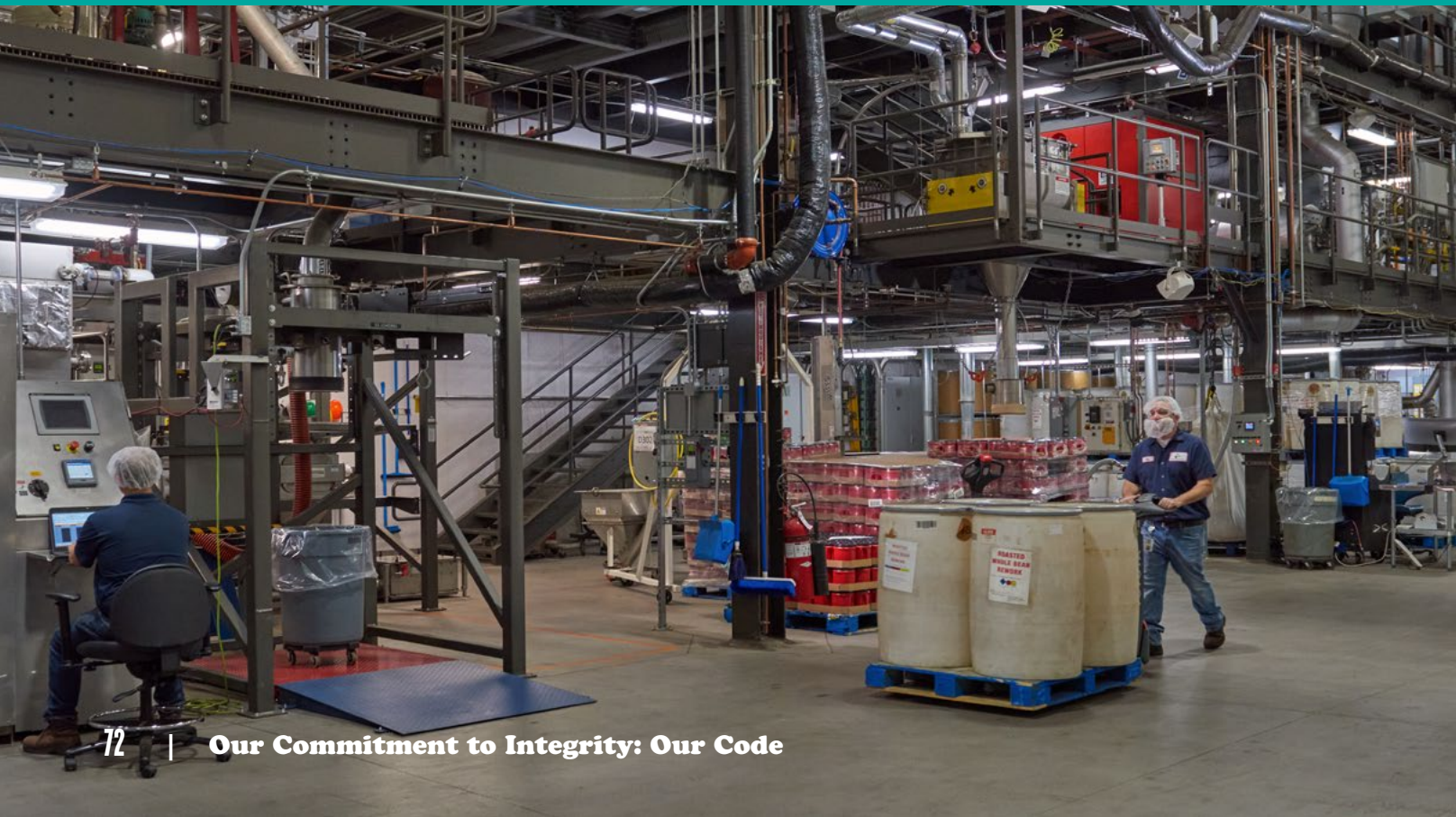
We value our relationships with our customers, suppliers, and competitors. We expect that each of us will deal fairly and honestly with these partners—treating them with the same respect and integrity that we expect for ourselves. We also expect our customers, suppliers, and other third parties working on our behalf to respect and uphold our commitment to fair dealing and to not seek or take any actions contrary to these principles.

This means we will:

- ▶ **Not engage in unfair, deceptive, or misleading practices;**
- ▶ **Never offer, promise, or provide anything in exchange for an inappropriate advantage to the Company or an employee; and**
- ▶ **Present our products in an honest manner.**



If you spot unusual or suspicious activity, we ask that you please report it immediately to your People Manager, the Ethics & Compliance team, or via our [Integrity Portal](#)



5.6 COMPETING FAIRLY IN THE INDUSTRY

We have competed in our industry with unmatched passion and purpose for over 100 years.

We continually earn our success through honest innovation and quality products. Our standing in the industry requires continuing compliance with antitrust laws that prevent any company from gaining an unfair advantage. Our Company believes in lawful competition and expects all of us to conduct business in an ethical way.

Competition or “antitrust” laws prohibit certain conduct involving competitors, customers, or suppliers in the marketplace that result in “restraints on trade.” Strict compliance with these laws is essential, and we are committed to complying with such laws globally, as violations can lead to substantial liability for our Company and the individuals involved.



DEALING WITH COMPETITORS

We must always make our own independent business decisions. Even casual conversations with a competitor can be seen as an attempt at restraining competition.

Use care in engaging in such conversations, and remember:

- ▶ **Never discuss prices, pricing policies, costs, product supply, terms of sale, marketing, territories, or other competitively sensitive information with a competitor;**
- ▶ **Do not formally or informally agree to fix prices, allocate production, allocate customers or suppliers, adjust sales volume, or divide sales territories;**
- ▶ **Do not agree to refrain from doing business with one another, and do not agree to refrain from doing business with one or more customers, suppliers, licensors, or licensees;**
- ▶ **Clear any collaborative arrangements, such as co-packaging arrangements, joint ventures, mergers, or purchasing co-ops with the Legal department;** and
- ▶ **Do not “signal” future pricing activity to our competitors as this could lead to accusations that competitors are colluding, rather than competing fairly on price and quality.**



GATHERING COMPETITIVE INFORMATION

It is sometimes permissible to gather information about our competitors in order to effectively compete with them and to better understand the competitive environment.

However, **when gathering competitive information, remember:**

- ▶ **Public information, such as news stories and trade journals, is the best source of information; and**
- ▶ **Never obtain sensitive information directly from a competitor, its broker or other representative.**

ENSURING FAIR TREATMENT FOR ALL CUSTOMERS

Always treating customers fairly and equally is in our DNA as a Company. That said, there are ways to ensure fair treatment of all customers, including but not limited to:

- ▶ **Treating similarly situated customers the same in terms of pricing, as well as promotional services and allowances;**
- ▶ **Not making agreements with customers regarding their resale price for our products; and**
- ▶ **Not tying or bundling products so customers must buy a specific combination of Company products to make a purchase.**



PARTICIPATING IN TRADE ASSOCIATION ACTIVITIES

Trade association activities can be valuable in promoting industry interests or legislative initiatives. However, employees should not discuss pricing or other competitive activities or information with competitors, nor should the industry association be used as a conduit for sharing competitively sensitive information. Trade association meetings should generally have legal counsel present, and minutes should be kept.



Q

:

At a recent trade association meeting, you overheard several competitors discussing sales territories. You were not involved in the conversation – just listened. How should you handle the situation?

A

:

While it is good that you did not participate, you should always remove yourself from the situation entirely. Always avoid even the appearance of participating in anti-competitive conduct. Report what you heard to the Ethics & Compliance Department, and do not share any of the information learned from the conversation.

FOR ADDITIONAL GUIDANCE

Antitrust laws are complex. It is particularly important to seek the advice of the Legal Department prior to implementing any arrangement about which there could be a question. You should also review the Company's [Antitrust Policy](#) for more information regarding prohibited conduct.



Find out More:

[Antitrust Policy](#)



5.7 ACTING RESPONSIBLY ON BEHALF OF OUR COMPANY

As we enter business and contractual relationships with our customers, suppliers, and other business partners, we act as ambassadors for our Company.

As ambassadors, we need to:

- ▶ **Use due diligence and prudence in committing to Company funds;**
- ▶ **Obtain all appropriate approvals before entering into a contract;**
- ▶ **Adhere to all policies related to establishing a business relationship with a third party; and**
- ▶ **Ensure that contracts are signed by authorized representatives of our Company.**



Find out More:

[Contract Review and Signing Policy](#)
[Procurement Policy](#)

Procedures:

We have stringent processes in place to make sure all Company funds are spent in a responsible manner. Before contracting any third parties and committing Company funds, ensure you follow all procurement policies and procedures and coordinate with the Legal Department for review, guidance, and approval. Once a contract has been executed, it is your obligation to understand, honor, and ensure compliance with the terms of the contractual commitments.

Independent parties:

For independent contractors and consultants, you must ensure there is a contract in place. There are various laws that apply to hiring contractors and consultants, and we have a process that must be followed before engaging these individuals.



WHAT IS THE PURPOSE OF FEDERAL SECURITIES LAWS?

One purpose of federal securities laws is to prevent individuals from using information not generally available to the public to make a profit through trading in a company's common stock and other securities.

5.8 INSIDER TRADING

We entrust our employees with a wealth of information during their employment with our Company. The receipt of this information brings certain responsibilities, some of which are required by federal securities laws. Employees are strictly prohibited from trading securities with information that is nonpublic and material. Doing so is against the law, and a serious violation of our Code.

Violating federal securities laws can result in civil and criminal penalties for both the individual and our Company. Accordingly, any employee who has access to material information about our Company or its activities that is not generally available to the public is prohibited from profiting from, disclosing, or otherwise taking advantage of that information. This includes being cautious with whom you share information inside of our Company.

Q

Smucker is considering acquiring a company, and you are on the team evaluating the opportunity. You have missed several family gatherings because of this commitment, and your brother wants to know what is keeping you so busy and whether that means it is a good time to invest in the Company's stock. How do you respond?

A

Because the potential acquisition is not public information, you cannot discuss the specifics with your brother. Do not share any information about this project with anyone outside of the small group involved in the transaction.

Employees are specifically prohibited from:

- ▶ **Trading in our stock while in possession of material, nonpublic information concerning our Company;**
- ▶ **Trading in the stock of another corporation on the basis of material, nonpublic information concerning a current or proposed transaction or relationship between us and that corporation;**
- ▶ **Trading in our stock at any time when a “trading ban” issued by the Chief Legal Officer is in effect;**
- ▶ **Disclosing any material, nonpublic information concerning the Company or its business to others who might engage in stock transactions based on such information; and**
- ▶ **Engaging in any transactions that suggest you are speculating in our stock (that is, trying to profit in short-term movements, either increases or decreases, in the stock prices).**



Need to speak up?

Access the JMS Integrity Portal!

Call: 1-844-319-9352 or
Online: www.jmsintegrity.com

WHAT IS CONSIDERED MATERIAL NONPUBLIC INFORMATION?

Nonpublic means it has not been broadly released to the general public. Among the types of information that may be considered material nonpublic information, and which employees must be careful with, is anything relating to significant new products, sales and earnings figures, financial results and projections, financings and capital restructurings, major contracts, plans for stock splits or stock repurchases, changes in senior management and acquisitions, divestitures, and mergers.

In addition to the restrictions above, **we prohibit all officers, members of our Board of Directors and certain other employees of our Company who have been identified and separately notified of such status from trading outside of an open “trading window.”** We typically open the trading window for a specified period of time commencing at the start of business on the second trading day following the date of public disclosure of our financial results for a particular fiscal quarter or year.

HOW WILL I KNOW IF A TRADING BAN IS IN EFFECT?

Employees will be notified by our Chief Legal Officer if they are subject to a trading ban during an open window.

WHEN IS THE SAFEST TIME TO TRADE?

Generally, the safest time for any employee to trade in our stock is during the open window periods beginning two days after each quarterly earnings release. Keep in mind, however, that if you are in possession of material, nonpublic information, you are prohibited from trading, even during this time period.

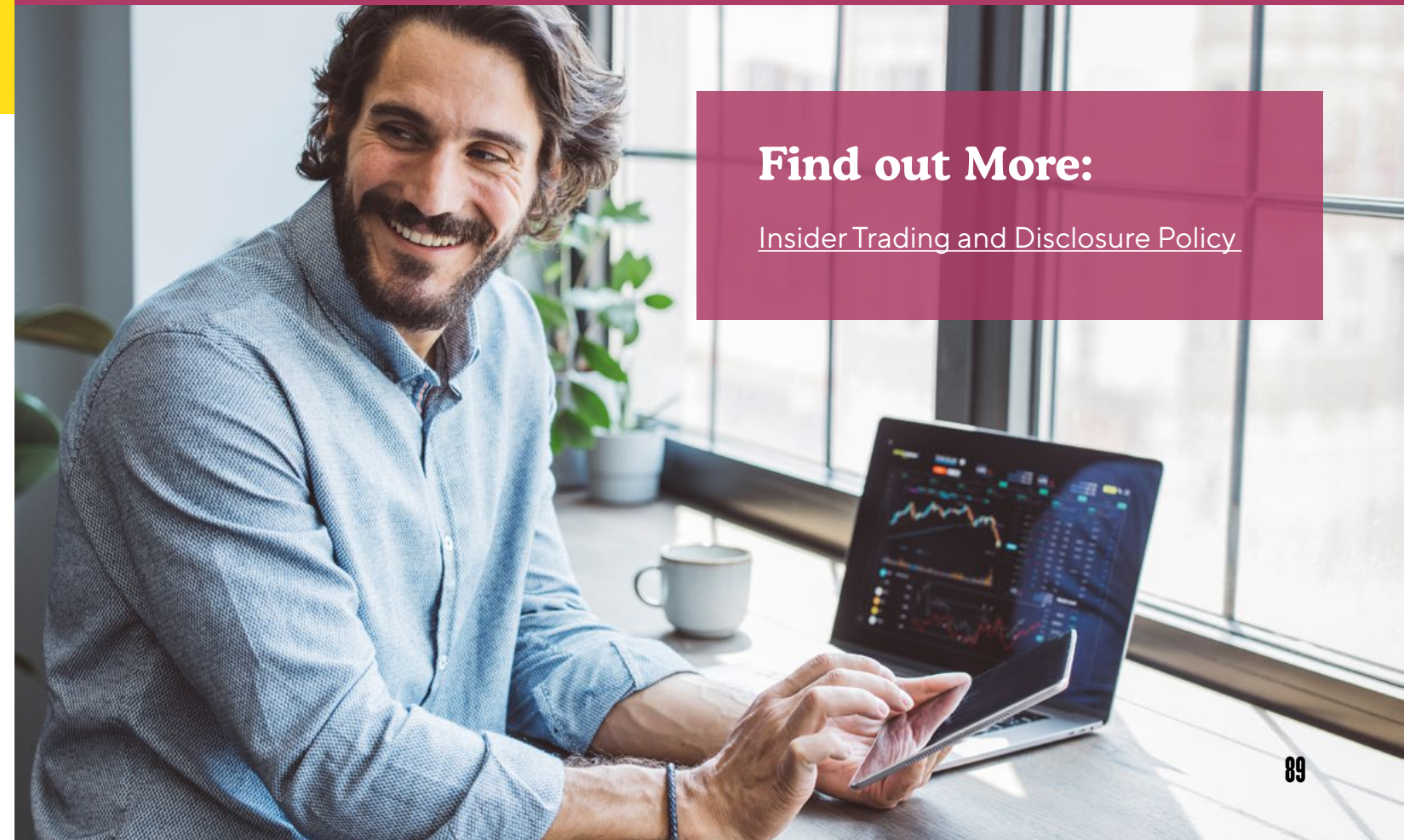
All employees of the J.M. Smucker Company are responsible for complying with our [Insider Trading and Disclosure Policy](#).

If you have questions regarding the law, or your responsibilities under it, contact the Legal Department or Ethics & Compliance department prior to trading any securities.

If you suspect a violation of the [Insider Trading and Disclosure Policy](#), report it immediately to any of the resources available to you, including the [Integrity Portal](#).

Find out More:

[Insider Trading and Disclosure Policy](#)



Our COMMITMENT TO COMPLIANCE



Find out More:

[Policy Against Bribery and Corruption](#)

6.1 COMPLYING WITH GOVERNMENT CONTRACTING REGULATIONS

Special laws and regulations apply when the Company does business with US government agencies and federal government contractors, such as the Defense Commissary Agency (DeCA), the United States Department of Agriculture (USDA), the Office of Federal Contract Compliance Programs (OFCCP), and any federal agency or branch of the military. Smucker is committed to compliance with all applicable laws and regulations and will act ethically in all transactions with the government, including compliance with the Federal Acquisition Regulations (FARs) when applicable.

Responsibility:

If your role at Smucker involves working or interacting with the government in any capacity, you are responsible for understanding and complying with the applicable laws and regulations that govern these relationships. Do not enter into a government contract without first consulting the Legal Department for guidance and support.

6.2 COMPLYING WITH GOVERNMENT CONTRACTING REGULATIONS

Our ability to move our products and goods efficiently and effectively around the world with integrity is critical to our success. Understanding and following the laws that affect our international business helps keep our Company strong.

All goods, ingredients, raw materials, equipment, machine parts, product samples, software, technology, packaging materials, and supplies that the Company sends into or brings out of a country are subject to these laws and must be handled and managed with continued diligence and care.



The Company is committed to compliance with all international trade laws and regulations around the world, including import and export laws, trade restrictions, trade embargoes, economic sanctions, and anti-boycott laws, amongst others. Failing to comply with these laws can result in significant fines and liabilities for the Company, including loss of import privileges and criminal penalties. If your work involves international trade and movement of our goods across borders, you have an obligation to understand and comply with all applicable laws and standards to uphold our commitment to ethical trade practices.

Trade laws and regulations can be complex. When in doubt or as questions arise, contact our International Trade Compliance Team for assistance. If you believe we are not in compliance with the law or our Policy, immediately report it to your Manager, Ethics & Compliance Team, or via the [Integrity Portal](#).

Our

COMMITMENT TO CONFIDENTIALITY



7.1 PROTECTING EMPLOYEE PRIVACY

When you join our Company you share personal, confidential information with us, including your contact information, social security number, financial and health-related information. We believe in ensuring the confidentiality of that sensitive data and protecting employee privacy.

To that effect, only authorized employees, based upon specifically defined job functions, are permitted to access personal employee information. Generally speaking, personal information includes personally identifiable information such as name, coupled with another personal identifier such as address, date of birth, etc.

If you are permitted to access personal employee information:

As specified in the Confidential Information section, you have additional obligations to protect this Highly Confidential Information from disclosure.

If you do not have authorized access to personal employee information:

You could come across personal information inadvertently through documents, emails or conversations. If you do, protect it as your own:

- ▶ **Never share an employee's personal information with anyone; and**
- ▶ **Refer any requests to the Ethics & Compliance Department.**

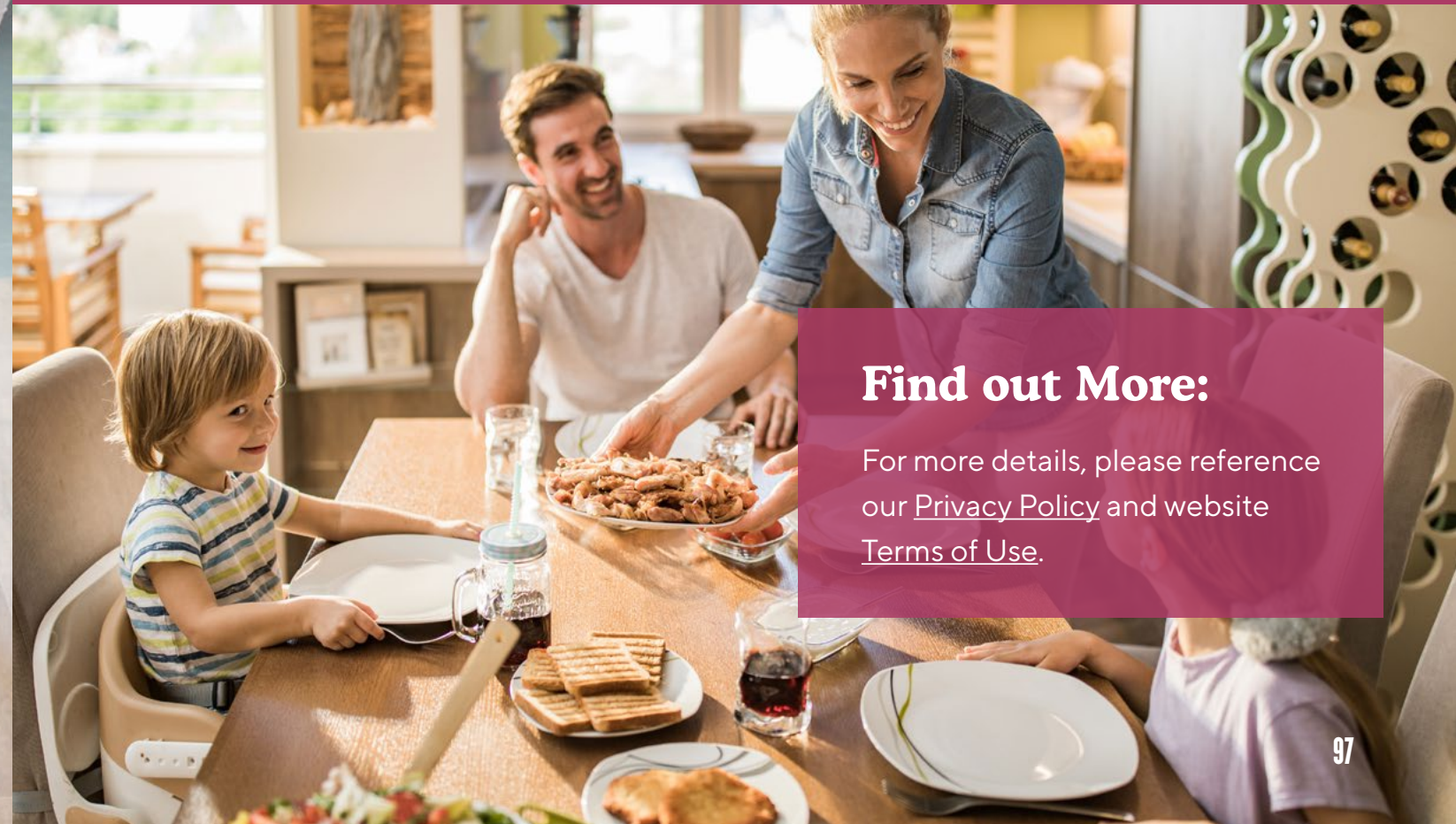


7.2 PROTECTING CONSUMER PRIVACY

The J.M. Smucker Company is committed to protecting the privacy and personal information of our consumers and the third parties we do business with as well as the individuals who work for our Company. This commitment includes compliance with all applicable privacy and information security laws and regulations.

Beyond these baseline laws and regulations, our Company implements controls to protect the personal information provided to us by consumers, and informs them how we collect it, what we do with it and the options and rights they have relative to the use of their information.

If your responsibilities include the gathering and management of consumer information, or if you have access to this information as part of your work, you are expected to understand and comply with all applicable privacy laws and regulations, and to safeguard this personal information that has been entrusted to us.



Find out More:

For more details, please reference our [Privacy Policy](#) and website [Terms of Use](#).

7.3 PROTECTING COMPANY ASSETS

At J.M. Smucker, we all have a role to play when it comes to ownership and responsibility of protecting our Company's assets from theft, loss, carelessness, waste and fraud. We expect all employees to safeguard and protect our Company's resources and assets as if they're your own, and ensure they're only used for legitimate business purposes.

Examples of Company Assets include:



PHYSICAL ASSETS

Cash and other financial assets, equipment, office supplies, inventory, hardware, tools and materials.

They must be safely stored and protected to prevent misuse, tampering, or theft.

INTANGIBLE ASSETS

The Company brand name, logos, trademarks, patents, copyrights, confidential information, trade secrets, ideas, plans and strategies. **They must be protected in the same manner as physical assets.**



INFORMATION TECHNOLOGY

Computing assets, systems, applications, networks and all other devices used to store or transmit Company information and records. **Employees are responsible for all system activity associated with their Company-provided user identification and technology, and must use all Company systems and information in accordance with Company policies and applicable laws.**

Regarding ownership of assets and information on Company-owned devices, please be mindful that:

- ▶ **All assets utilized for work, both physical and technological, belong to the Company and should be utilized with care and in accordance with law and all applicable policies;**
- ▶ **Any information generated on the Company's assets, systems and equipment, including email, voicemail, telephone and internet connections, at our Company or during the course of conducting Company business, belongs to our Company;**
- ▶ **The Company may access at any time the software, files, documents, or communications stored on its property or in its systems, and may access personal computers and devices containing Company information; and**
- ▶ **There is no right to privacy with respect to this information and any such information may be disclosed in the event of a legal action, including personal devices used in the course of work.**



Regarding personal use of the Company's devices and systems, including phone, email and the internet, this is permissible so long as such usage does not:

- ▶ **Extend beyond what is reasonable and occasional;**
- ▶ **Interfere with your work performance or that of others;**
- ▶ **Involve illegal, sexually explicit, political, discriminatory or otherwise inappropriate material;**
- ▶ **Relate to outside business interests; and**
- ▶ **Introduce malicious cyber-attacks through external devices or downloading unauthorized material.**



For Additional Guidance

Please review our [Company's Information Security Policy](#) and [Access Control Badge Policy](#)

7.4 PROTECTING CONFIDENTIAL INFORMATION

As a part of your job responsibilities, you may have access to nonpublic information about our Company or one of its business partners concerning products, technology, business transactions, finances, operations, personnel or customers (“Confidential Information”). Confidential Information includes any information not disclosed or available publicly that our Company uses to help further our business interests, or that could cause harm or create potential liability for our Company if disclosed early or improperly. **All confidential information should be treated carefully and protected from wrongful or unauthorized disclosure.**

You are expected to know the categories of Confidential Information and your role within each:

Highly Confidential Information and Confidential Information should only be disclosed on a “need-to-know” basis, and as permitted by Company policy and applicable regulations. Confidential Information should only be shared with business partners in order to conduct business when a signed Non-Disclosure Agreement is in place. Confidential Information should never be used for your personal benefit or others’ during or after employment.

CONFIDENTIAL INFORMATION

HIGHLY CONFIDENTIAL INFORMATION:

- This is the most sensitive information our Company maintains. Individuals with access to this information should use extreme caution and not share it with other individuals, including other employees, unless such individuals and employees are authorized to receive the information and such individuals and employees require the information to perform their job. Furthermore, each recipient of this information must take appropriate steps that are required by the Company to protect it. There may be additional regulations and restrictions associated with this information that must be followed.
- Examples: Trade secrets; merger and acquisition information; information subject to a regulatory requirement, such as personally identifiable information (PII), personal health information (PHI), and payment card industry data (PCI); material nonpublic information; attorney-client privileged information.

CONFIDENTIAL INFORMATION

- This information should also be protected as Confidential Information, but does not have the additional regulatory or legal requirements associated with Highly Confidential.
- Examples: Contractually protected information; information that contains content with relevance to a specific job or role- limited access.



INTERNAL ONLY – ALL EMPLOYEES

- This information is not necessarily confidential, but should not be shared outside of the Company.
- Examples: Internal all employee memos; corporate directory/organizational charts; employee policies.

NON-CONFIDENTIAL PUBLIC INFORMATION

This is the only type of information you may freely share is public information, which should be clearly marked and/or obvious, such as press releases and new product launches that are on shelf with our customers. If you have questions, please contact the Ethics & Compliance Department.

If you have questions, or are unclear about your responsibilities, please reach out to and consult with your **People Manager**. Immediately report any unauthorized disclosures or improper conduct to the **Legal Department, Ethics & Compliance Department** or report concerns via our [Integrity Portal](#).

Find out More:

[Legal Department's Contracts](#)

7.5 PROTECTING INTELLECTUAL PROPERTY

Our intellectual property is among our most valuable assets and as such, is protected to the fullest extent permitted by law. We must never allow anyone outside our Company to use our intellectual property improperly or without authorization, and we are all responsible for the safeguarding and proper use of our intellectual property while working for or on behalf of our Company. We also respect others' Intellectual Property rights.

Examples of Intellectual Property include:

Our logos, brands, formulas, trademarks, patents, copyrights, trade secrets and know-how, and other intangible property.

As a Company employee, if you conceive or create something while using Company time and resources, it is considered work product and it, as well as any intellectual property rights associated with it, belongs to the Company.

Examples of Employee-Created Intellectual Property include:

Designs, ideas, inventions or improvements to existing operational or business capabilities, created as part of your work.

Employees are responsible for promptly disclosing anything conceived or created using Company time and/or resources as a condition of employment, and this work becomes the intellectual property of the Company.

Find out More:

[Non-Disclosure and Invention
Assignment Agreement](#)



Our COMMITMENT TO COMMUNITY

8.1 CARING FOR OUR COMMUNITY

We strive to give back and make positive contributions in the communities in which our Company operates, and we appreciate the shared passion of our employees who support this effort through both volunteerism and financial donations.



Find out More:

[Smucker Giving Site](#)

WAYS TO CARE FOR OUR COMMUNITY

Volunteer at the corporate level.

We support any employee who wishes to engage in Company-sponsored volunteer events, but we always understand that other priorities exist.

Volunteer on a personal level.

We support your personal efforts to make the world a better place, and we celebrate your outreach to people and causes that matter to you. Just make sure any volunteer activities you undertake are lawful and do not create a conflict of interest with the work you do at the Company.

Make charitable contributions.

Our Company Matching Gift Program is intended to make it easy and inspiring for employees to make financial donations to the wide variety of vetted and verified non-profit charities that are included in our Program. The Company will match dollar for dollar employee contributions to any of our Charities-of-Choice from a minimum of \$5 up to \$2,500 per calendar year.

8.2 PUBLIC-FACING COMMUNICATIONS

As a Company and individuals, we often receive inquiries from various sources, including consumers, shareholders, analysts and the media asking us to comment on a variety of topics including acquisition and divestiture activity, new products, management changes and litigation.

We strive to maintain an open dialogue with our constituents and have an established process for ensuring disclosure of material information is disseminated on a broad basis in compliance with federal securities regulations and the rules of the New York Stock Exchange.

It is best not to speak on behalf of the Company or give the impression your views represent those of our Company.

The only exception is if you are an authorized spokesperson, in which instance, you should direct the inquiring party to Corporate Communications. Only identified spokespersons are authorized to speak with the investment community and the media, as determined by Corporate Communications and Investor Relations.

If you receive a media inquiry, please direct the request to [Corporate Communications and Investor Relations](#).





Find out More:

[Social Media Policy](#)

8.3 SOCIAL MEDIA

In the age of social media, digital platforms are highly effective and important when it comes to communicating as a Company, and for maintaining individual, personal relationships. While social media supports the advancement of our business, brands and reputation, it also carries important responsibilities and presents certain risks.

To guide you in your use of social media as it relates to our Company, reference the below:

- Our Communications teams (Marketing and Corporate) are responsible for publishing social media content, and for making official statements on behalf of the Company;
- If you post about our Company or our products as an individual, be open and transparent about your employment with Smucker by using the hashtag #MyCompany, while being careful to not suggest you are an official Company spokesperson. Make it clear that the opinions are your own, not the opinions or official position of the Company;
- Our commitment to maintaining a positive work environment extends beyond our physical locations and facilities to anywhere you may influence or impact the experience of a colleague, including on social media. Be thoughtful about how your views and opinions could impact a colleague's work environment or the reputation of our Company;
- Be respectful of your audience. Always interact in a way that is fair, courteous and honest. Employees should not post or display comments that could be viewed objectively as offensive, unprofessional, profane, vulgar, obscene, threatening or intimidating. We always recommend any work-related concerns be discussed with your manager face-to-face (vs. through other mediums); and
- Protect and do not disclose Company Confidential Information.



8.4 ENVIRONMENTAL, SOCIAL & CORPORATE GOVERNANCE (ESG)

We believe success is driving business growth while helping those associated with our Company thrive. For more than 120 years, we have done just that. Our philosophy of corporate responsibility builds on the wisdom of our founder, J.M. Smucker, a deeply principled and forward-thinking man.

For our Company, being responsible means doing the right thing for our consumers, customers, employees, suppliers, communities and shareholders. Our commitment to being a good corporate citizen allows us to positively impact the lives of our employees and business partners, as well as the communities and planet we all share.

8.5 ANIMAL WELFARE

Whether farm or domesticated, we believe all animals should be treated with care and compassion throughout their lives. This policy clearly communicates our:

- ▶ **Commitment to not conduct or sponsor any harmful animal testing;**
- ▶ **Expectations for the humane treatment of animals in our supply chain; and**
- ▶ **Efforts to improve the lives of, and relationships with, our pets in the United States and Canada.**

These commitments are delivered in conjunction with our business partners and are aligned with the breadth and volume of our product portfolio.

Find out More:

[Responsible Sourcing Policy](#)



8.6 ENVIRONMENT

Environmental stewardship has always been part of our heritage and a key consideration in how we operate today. We go beyond simply complying with environmental laws to contributing to create a healthier planet for future generations. To achieve this outcome, we work to deliver a more sustainable approach to our operations and value chain through a focus on climate action, natural resource stewardship and responsible sourcing and packaging. This is not just good business; it is good for all of us.

Employees can help put our commitment to the environment into action by maintaining a sustainability mindset from concept to commercialization.

Be proactive and responsible, working with these actions in mind everyday:

- Make decisions that balance long-term considerations with short-term needs.
- Work efficiently to steward important natural resources and produce less waste.
- Handle, store and dispose of materials appropriately.
- Prevent leaks, spills and other unauthorized discharges.
- Submit environmental reporting data promptly and accurately.
- Consider impacts of our products throughout the entire life cycle.
- Be a champion of change where you see opportunities for improvement.



Q



A contact of yours from one of our suppliers told you about some questionable practices regarding waste disposal. You are concerned about it, but figured that it is their problem. Should you tell someone about this?

A



Yes, we expect our suppliers to uphold the same high standards we uphold. You have an obligation to take action by reporting this activity to the Health, Safety & Environmental team.

8.7 POLITICAL ACTIVITIES

We encourage participation in political activities that interest you. A decision to contribute time or money must be made on your own time and at your own expense. It is generally impermissible for a corporation to contribute services, corporate funds or property (except through the Company's Political Action Committee) for partisan political purposes. Therefore, Company funds are not to be expended directly for any political candidate or party.

- **If you are contacted by a candidate for elected office or their staff, the inquiry should be directed to the Smucker Political Action Committee (PAC) for consideration relative to the PAC bylaws and giving guidelines.**
- **If you engage in personal political activities, you may not identify yourself as a representative of the Company.**
- **We expect each of you to be respectful of the political and personal views of your fellow employees and business partners.**
- **Neither the Company nor the Company's PAC will reimburse you for any political contributions you make to political candidates, parties, or issues.**
- **Our Government Relations team is responsible for all lobbying activities done on our Company's behalf and for communicating with government officials and policy makers about federal government relations efforts. Unless a member of our Government Relations team contacts you, please do not engage in any lobby activities on behalf of the Company.**



Find out More:

[Government Contacts and Lobbying Disclosure Policy](#)

Q



You are a Plant Manager. Can you instruct the plant's finance manager to contribute to a candidate running for local office whose views would benefit the plant and our Company if the amount of the donation is within your financial authority?

A



While you may always make a contribution using your personal funds, you may not make a contribution to any political campaign or organization on behalf of our Company or using Company funds.

INTERNAL and EXTERNAL POLICIES



9.1 RECORDS & FINANCIAL RECORDS

It is important that Company Records be retained for the period of their immediate use, with additional retention requirements for historical, contractual, tax or legal reasons, as set forth in our [Records Management Policy](#) and [Retention Schedule](#). Company Records, including onsite and offsite records, that have exceeded this period should be promptly destroyed in a secure manner. Our Policy applies to all record types regardless of the medium in which they are maintained. When actual or threatened litigation or government investigations arise, the Legal Department will issue a special notice (“Legal Hold”), advising employees to retain certain records beyond their usual retention periods. In such a case, you must follow the directions and refrain from destroying any such records until you are notified otherwise.

Similarly, it’s important that we accurately represent our books and financial records, as these paint a portrait of our financial position and stature as a company, and federal securities laws require all public companies disclose complete and accurate financial information completely and regularly. We prepare consolidated financial statements on a quarterly and annual basis for release to the general public. Our management is primarily responsible for the integrity of financial information and for ensuring that all disclosures in reports filed with the Securities and Exchange Commission and other public communications are full, fair, accurate and timely, and that such disclosures are not misstated due to fraud or error.

Being timely, clear and accurate regarding our financial standing and portrayal is at the core of our commitment to integrity, and as such, **each of us has a responsibility to honestly represent sales, expenses and earnings, and exercise discipline in handling Company finances and records.** Each employee is responsible for safeguarding our assets and for ensuring that the corporate books and records are accurate and fairly reflect our transactions.

Accurate financial reporting means employees should never:

- Falsely report time worked to earn more pay or to avoid discipline for being late to or absent from work;
- Submit a false expense report;
- Alter production numbers to meet productivity goals;
- Present false medical information to obtain disability benefits;
- Inflate or deflate quarterly or annual sales;
- Accelerate or defer costs in violation of generally accepted accounting principles;

Q



An invoice came in for advertising, but there is no purchase order in a system to process it. This means it has not been factored into our latest spending forecast. Can you just defer the expense until next year?

A



No, vendor liabilities must be recognized in the period the services were rendered. You should contact Payment Services for assistance.

- Misstate financial information in our Company's books and records.

This obligation extends to any submissions of documentation we make outside of our Company, whether to the government or third parties.



Anyone with access to, or responsibility for, accounting or financial information relating to our Company should promptly engage either the Ethics & Compliance Department or Internal Audit Department with any information concerning the following:

- ▶ **Significant deficiencies in the design or operation of internal controls that could adversely affect our ability to record, process, summarize and report financial data accurately; or**
- ▶ **Any suspected theft or fraud, whether or not material.**

For more information on general records, please reference our [Records Management Policy](#) and [Record Retention Schedule](#).

Code GOVERNANCE AND ADMINISTRATION



CODE ADMINISTRATION

The Board of Directors has adopted this Code and provides oversight of our Ethics & Compliance Department. Our Executive Leadership Team is responsible for overall management, and under the direction of the Chief Legal Officer. The Company's Ethics & Compliance Department is responsible for day-to-day management and administration of this Code.

Our Ethics & Compliance Department is also responsible for interpretation of the Code and administering updates to it.

Any questions regarding interpretation of this Code, and/or responsibilities under it, should be directed to the Ethics & Compliance Department for clarification and guidance.

If any part of this Code conflicts with local laws or regulations, only the sections of this Code permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this Code.

WAIVERS

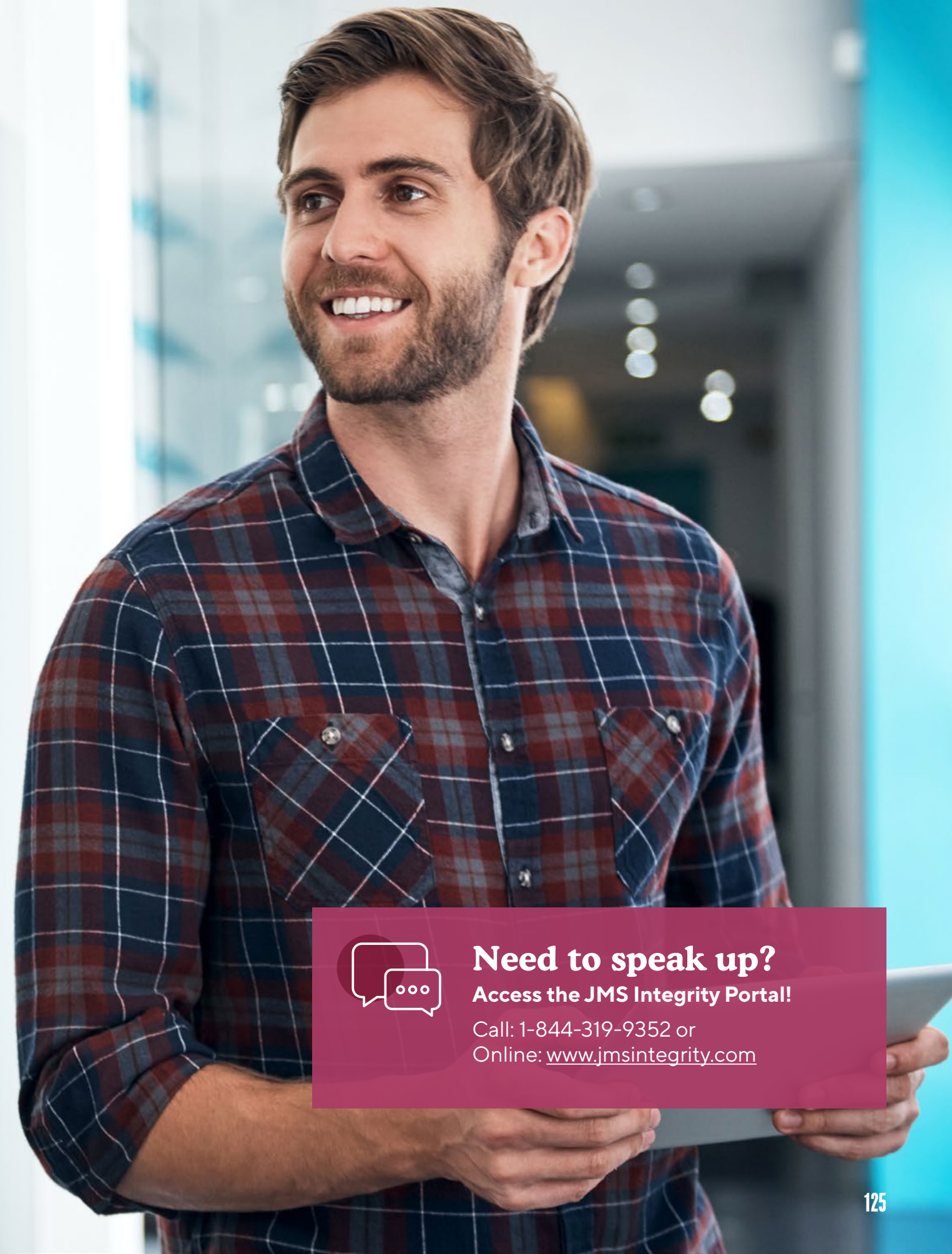
Our Board of Directors or its designated committee must approve any waivers or exceptions to the Code requested by any of our Executive Officers or any member of our Board of Directors. As required by applicable law and the rules of the New York Stock Exchange, any waivers or exceptions granted will be promptly disclosed to the public.

Only our Chief Legal Officer may authorize waivers or exceptions to our Code, policies, procedures, and guidelines for any other employee. Any such requests will be considered only when good cause is shown.

EMPLOYEE RIGHTS

Our Code and our policies do not limit an employee's right to communicate with any government agency, such as Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration or the Securities and Exchange Commission (or equivalent government agencies in Canada), or otherwise to participate in an investigation or proceeding that may be conducted by any such government agency, including providing documents or other information without notice to the Company.







The Company supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right.



Need to speak up?
Access the JMS Integrity Portal!

Call: 1-844-319-9352 or
Online: www.jmsintegrity.com

HELPFUL RESOURCES

Contact	Contact Information
 Company Communications	company.communications@jmsmucker.com
 Corporate Giving	https://jmsmucker.sharepoint.com/sites/Neighborhood/Smucker-Giving
 Employee Relations	1-877-567-4704
 Ethics & Compliance Department	Smucker.ethics@jmsmucker.com
 Government Affairs & Sustainability	https://jmsmucker.sharepoint.com/sites/Neighborhood/Sustainability/Pages/Home.aspx
 HR HOME	1-877-567-4704

Contact	Contact Information
 Investor Relations	https://investors.jmsmucker.com/
 Legal	https://jmsmucker.sharepoint.com/sites/Neighborhood/Legal
 Smucker Integrity Portal	www.jmsintegrity.com
 Health Safety & Environmental	www.jmsintegrity.com
 Food Safety & Quality	www.jmsintegrity.com



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