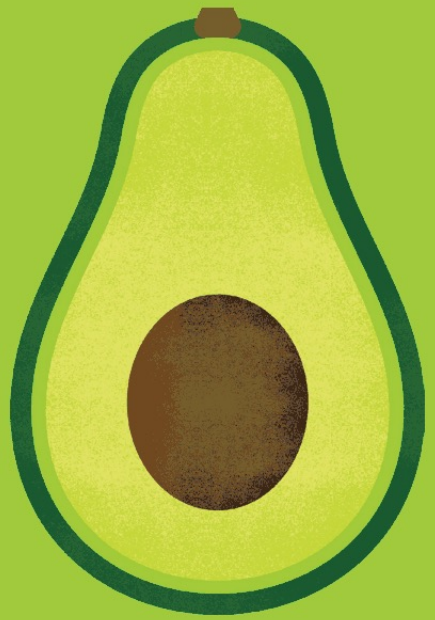
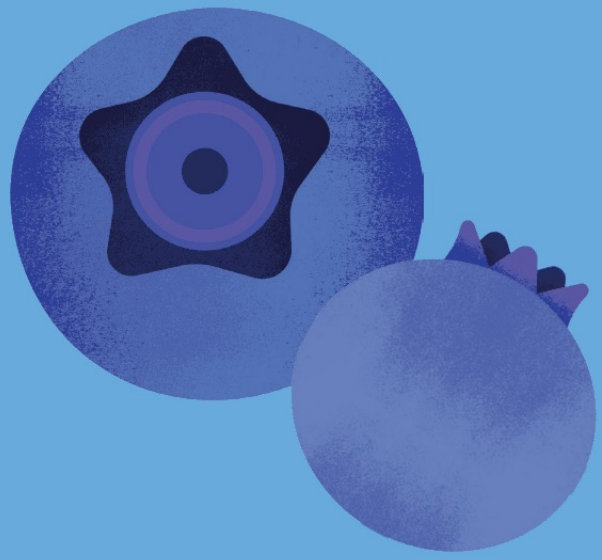
Farm-Fresh Taste Grows Here.™

ONCE UPON A FARM™









Code of Conduct & Ethics

A Note from Our Founders

Once Upon a Farm started in Cassandra Curtis's kitchen with a dream to transform the baby & kid nutrition space toward better, healthier, and more nutritious choices, from a brand that parents can trust. Our company mission is to drive systemic change in childhood nutrition for a happier, healthier, and more equitable world. In pursuit of this mission, since the beginning, we've organized our business decision making around a strong set of core values that reflect the kind of company we want to be, to be the best we can be and also to set an example for others.

We aspire to live our Core Values every day and do our part in creating a healthier, happier world – one delicious meal at a time.



Once Upon a Farm Co-Founders
John Foraker, Jen Garner & Cassandra Curtis

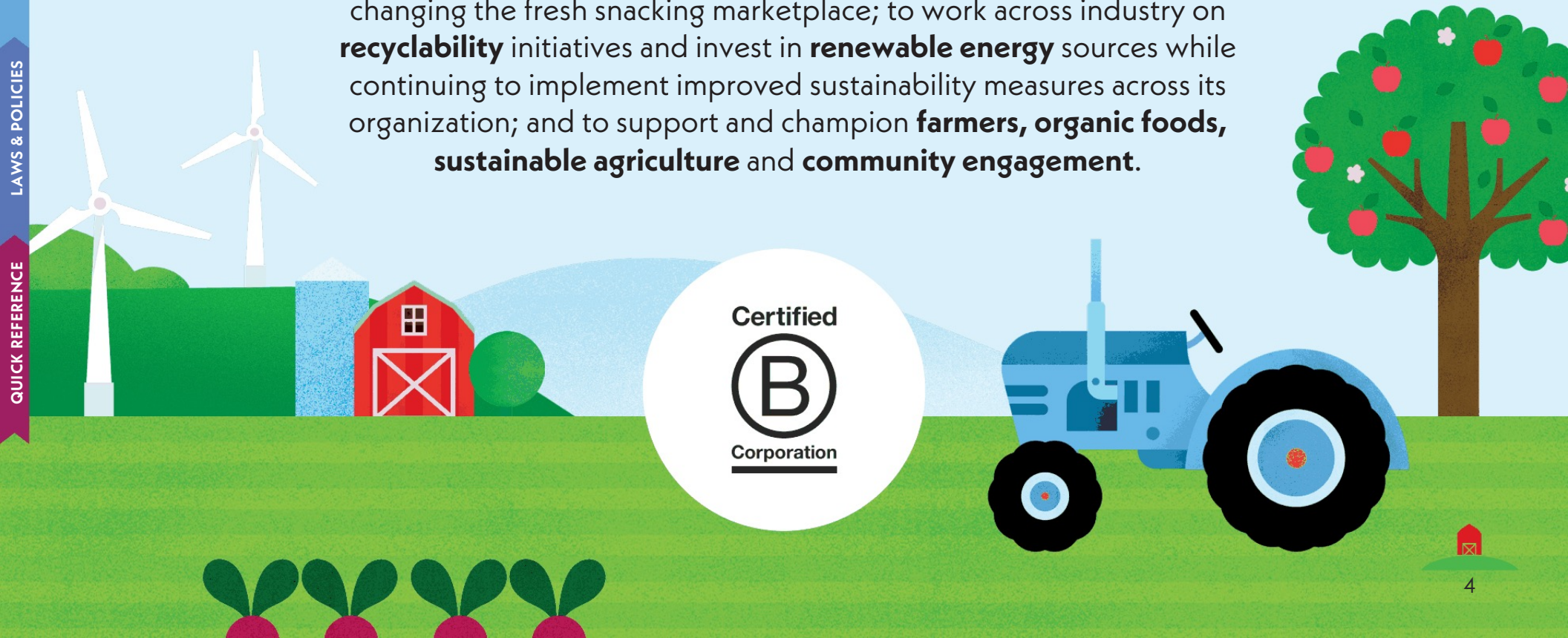
Our Core Values

- We lead by ensuring every decision we make is rooted in honesty, integrity and transparency.
- We craft pure, nutritious food that will delight children of all ages.
- We support and champion farmers & farmworkers who supply the high-quality organic ingredients for our foods.
- We help caregivers keep their promise to provide the best nourishment for their children's body and soul.
- We treat our consumers, customers, suppliers, investors and all our valued employees with the same high level of dignity and respect we expect from others.
- We will always fight for and support efforts to drive positive social change and food justice for the benefit of kids and families.
- We foster an entrepreneurial culture that values humility, honesty, passion, positive social impact, and fun.



Our Public Benefit Corporate Charter

The Corporation is a Public Benefit Corporation under Delaware law. The specific public benefits to be promoted by the Corporation are to drive improvements in **childhood nutrition** for a **healthier** and **happier** planet; to commit to a portfolio of products and an **innovation pipeline** that leads in how it approaches **access, nutrient excellence,** and changing the fresh snacking marketplace; to work across industry on **recyclability** initiatives and invest in **renewable energy** sources while continuing to implement improved sustainability measures across its organization; and to support and champion **farmers, organic foods, sustainable agriculture** and **community engagement**.



Our Impact

Sustainability & Impact

We are proud to be incorporated as a Public Benefit Company in Delaware and a Certified B Corporation. These designations reflect our belief that how our products are made is as important as what's in them. We believe our success reflects our impact on customers and communities and look to the UN definition that sustainability is "meeting the needs of today without compromising the ability of future generations to meet their own needs." This belief drives our investment in organic agriculture, responsible sourcing, and equitable access to nutritious food for every child. Our sustainability work includes advancing renewable energy through RECs, minimizing packaging impacts with source reductions and a mail-back pouch program, and measuring our carbon footprint annually.

Everyone at the company plays a role in advancing our public benefit commitments. With values rooted in transparency, we publish priorities and progress each year in our Impact Report. Our approach is guided by science, industry best practices, and regulatory standards across the United States, Canada, and the European Union, helping us stay accountable to quality, safety, and environmental stewardship. Caring for people and the planet is central to our recipe for making great food and building a better future.



Our Code

Effective Date: February 5, 2026.
Applies To: Once Upon a Farm, PBC and all of its consolidated subsidiaries.
We use the term "O'Farm" or "Company" to refer to Once Upon a Farm, PBC and its consolidated subsidiaries.
Policy Approved by: The Board of Directors of Once Upon a Farm, PBC

Scope & Purpose of Our Code

The Code of Conduct and Ethics (the "Code") applies to all of our directors, PBC Advisory Board directors, officers and other employees in the United States and internationally. We also expect our suppliers and third-party business partners to follow our Supplier Code of Conduct, and the standards in our Supplier Code of Conduct are consistent with those in this Code.

This Code sets expectations for ethical behavior and legal compliance and works hand in hand with our policies and the laws that protect workers, consumers, and the environment. To the extent this Code requires a higher standard than required by applicable laws or regulations, the Company adheres to those higher standards.

Responsibilities We Share Under the Code; How To Report Violations

At O'Farm, we share a duty to prevent, correct and, if necessary, report suspected violations of the Code. This allows us to promptly deal with concerns before they become major problems.

If something doesn't feel right or you're unsure about how to proceed, please speak up. We will investigate every report fairly and promptly, and we do not tolerate retaliation against anyone who raises a concern in good faith.

You can:

- Talk to your supervisor or manager.
- Contact the Company's Chief Compliance Officer or their designee.
- Use the **Ethics Point Hotline** at **+1 (833) 841-4115**, website *https://uponafarm.ethicspoint.com* or mobile app *https://uponafarmmobile.ethicspoint.com* for confidential, anonymous reporting.

The hotline is managed by an independent third party 24/7 and supports reporting in multiple languages.

Our Code

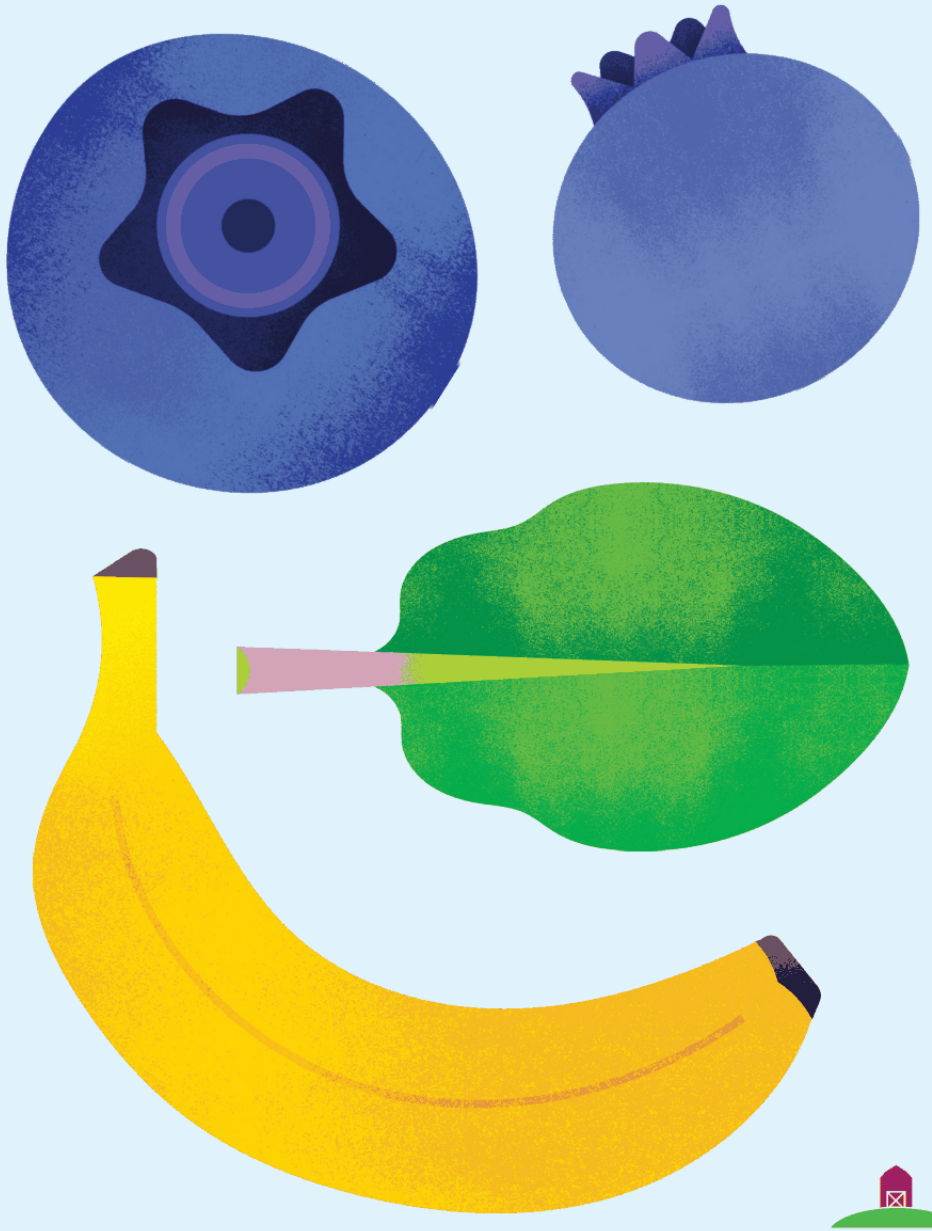
Maintaining a Positive & Respectful Workplace

People are at the heart of what we do and how we operate. We believe in providing a positive work environment in which communications are both open and respectful.

Consistent with our commitment to maintaining a positive and respectful workplace, the Company has zero tolerance for harassment of any kind.

Fair Dealing

Each director, officer and employee must deal fairly with the Company's customers, suppliers, competitors, partners, service providers, employees and anyone else with whom they have contact in the course of performing their job. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.



Conflicts of Interest

A conflict of interest occurs when an individual's private interest (or the interests of their family) interferes, or even appears to interfere, with the interests of the Company. A conflict of interest can arise when an employee, officer or director (or a member of their family) takes actions or has interests that may make it difficult to perform their work for the Company objectively and effectively. Loans by the Company to (or guarantees by the Company of obligations of) directors, officers, employees or their family members are of special concern. Loans by the Company to (or guarantees by the Company of obligations of) any director or executive officer (or their family members) are expressly prohibited.

Conflicts of interest also arise when an employee, officer or director (or a member of their family) receives improper personal benefits as a result of their position within the Company. Common examples of conflicts of interest include:

- Holding outside roles or providing outside services with a customer, supplier, or competitor;
- Holding a financial interest in a business that is a supplier to or partner of the Company;
- Having a family or personal relationship that may affect hiring or vendor selection.

Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

Persons other than directors and executive officers who have questions about a potential conflict of interest (or who become aware of an actual or potential conflict) should discuss the matter with, and seek a determination and prior authorization or approval from, their manager or supervisor. A manager or supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the Chief Compliance Officer or their designee with a written description of the activity and seeking their written approval. If the supervisor is themself involved in the potential or actual conflict, the matter should instead be discussed directly with the Chief Compliance Officer or their designee.

Executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee of the Board (the "Audit Committee").

Procedures relating to the disclosure, identification, and review of conflicts of interest for directors are set forth in the Company's Director Conflict of Interest Policy, and require disclosure to the Chair of the Board.

Company Books & Records

Our financial and business records must always be accurate, complete, and transparent in all material respects. Misrepresentation of data — even with good intentions — undermines trust and violates the law.

We comply fully with accounting and disclosure requirements under laws like the Sarbanes–Oxley Act. This means:

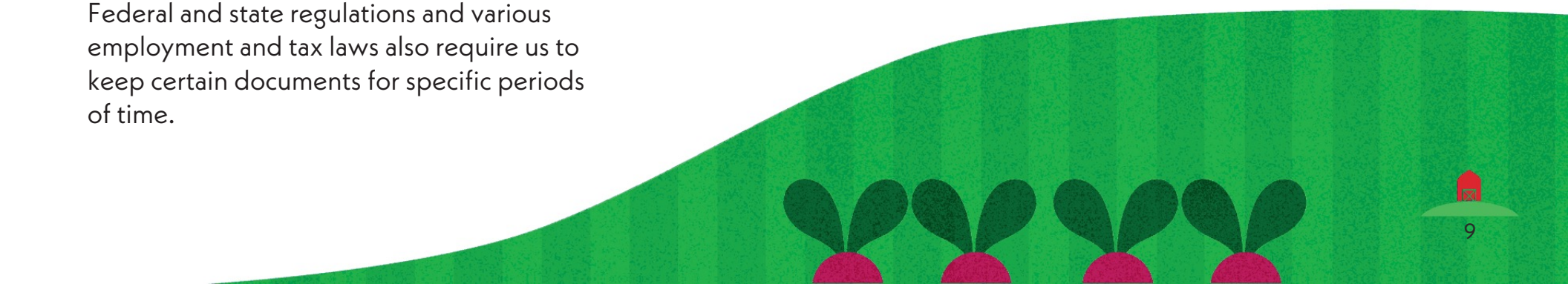
- Never falsifying, omitting, or misrepresenting data.
- Recording transactions honestly, in the correct period and account.
- Following internal controls to prevent errors and fraud.

Federal and state regulations and various employment and tax laws also require us to keep certain documents for specific periods of time.

Never destroy or alter a record that might relate to an investigation, audit, or pending claim. When you receive a "legal hold" notice from Legal, immediately suspend routine deletion of related documents — digital or paper. Store company data securely, following IT and record-retention procedures. If you are unsure whether to keep or delete something, ask before acting. Responsible record management preserves both compliance and trust.

Employees responsible for financial reporting, auditing, or regulatory filings have a special duty to maintain accuracy. But all of us play a role, whether submitting a receipt or entering production data. False information, even if unintentional, can lead to serious legal and reputational harm.

If you believe something has been recorded incorrectly, speak up immediately.



Our Code

Protecting Company Assets

The Company's proprietary information, equipment, and funds are all assets of the Company. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any non-public financial data or reports.

Misuse or theft of assets, including using company credit cards for non-business expenses, is unacceptable. Intellectual property, including our recipes, designs, trademarks, and brand identity, must be safeguarded as carefully as physical assets.

Each of us is also a steward of intangible assets like goodwill and reputation. Treating others with respect, handling products carefully, and following through on promises all protect the brand value we've built together.

Responsible Use of Technology & Social Media

Company systems and devices are primarily for business use. Do not download unauthorized software, access offensive material, or share confidential files outside secure channels. Cybersecurity depends on every employee using caution with links, attachments, and passwords.

Social media activity should reflect respect and common sense. Share your pride in our mission, but never disclose internal information or speak as an official company representative unless authorized. If you encounter false information or negative commentary about Once Upon a Farm, don't engage directly — refer it to the Company's Chief Marketing Officer.



Confidential Information & Data Security

We protect confidential Company information — including product formulas, research, supplier data, pricing, and marketing plans — as well as the personal data of employees and consumers.

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers or partners. Confidential information includes all non-public information (regardless of its source) that might be of use to the Company's competitors, or harmful to the Company or its customers, suppliers or partners if disclosed.

Access is limited to those who need the information for legitimate business purposes. Sharing or mishandling data can harm our reputation and violate privacy laws.

Each of us must use secure systems, follow cybersecurity protocols, and immediately report any suspected data breach.

Accuracy of Financial Reports & Other Public Filings

The Company's periodic reports and other documents filed with the United States Securities and Exchange Commission ("SEC"), including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each director, officer and employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

Each director, officer and employee who is involved in the Company's disclosure process must:

- Be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and
- Take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business conditions of the Company provide full, fair, accurate, timely and understandable disclosure.

Public Communications

Official communications with the media, investors, or the public must be handled by authorized representatives. It is against Company policy for directors, officers or employees to disclose confidential information about the Company to anyone, except where disclosure is authorized or legally mandated. This policy is important not only to preserve Company confidences, but also to comply with U.S. federal securities laws designed to prevent "insider trading."

To guard against the disclosure of material nonpublic information to the Investment Community (defined as market professionals such as analysts, broker-dealers, institutional investors, investment advisors, institutional investment managers and investment companies who are reasonably likely to trade on material nonpublic information), our policy designates certain employees as Company "Spokespersons": the Chief Executive Officer, Chief Financial Officer, and the Chief Marketing Officer or their designee. The Spokespersons are the only individuals authorized to disclose information about the Company to the Investment Community. Individuals who are not Spokespersons should refer any inquiries from the Investment Community about the Company to a Spokesperson.

Our policy applies to communications in all forms of media, including print (such as newspapers, magazines and journals), television, radio, social media and all other electronic media (such as websites, blogs, newsletters, compact disks, tapes, etc.). For more information, see the Company's Regulation FD Policy.



Compliance with Laws & Policies

Directors, officers and employees should comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities, states and countries in which the Company operates. This includes insider trading laws, which are addressed in the Company's Insider Trading Policy, as well as anti-corruption laws, which are addressed in the Company's FCPA Anti-Corruption Compliance Policy, as well as antitrust laws – among others. Although directors, officers and employees are not expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice. Any questions about compliance should be addressed to the Company's Legal Department.

Compliance with Antitrust Laws

Antitrust laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all applicable antitrust laws wherever we do business in the U.S. and around the world.

Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions. Violations of antitrust laws may include:

- Agreements with competitors to allocate customers or regions (e.g., "You agree not to interfere with my sales efforts in a specified region in exchange for me not competing with your sales people in another region"),
- Agreements with competitors to set prices;
- Agreements with competitors not to recruit or hire each other's employees; and
- Practices, such as exclusive dealing, price discrimination, "tying" (conditioning the sale of a product on the purchase or sale of another product), in circumstances where these practices have an unreasonable impact on competition.

In addition, exchanging competitively sensitive information with competitors (such margins or future pricing) is closely scrutinized by regulators and can lead to substantive criminal and civil penalties for both you and the Company.

Laws & Policies

Compliance with Insider Trading Laws

At times, employees may learn information that is not public — such as future product launches, business partnerships, or financial results. Using that information for personal benefit, or sharing it with others, violates the law and our values.

Insider trading laws apply to anyone who buys or sells securities based on material, non-public information. Even passing along a "tip" to a friend or relative can be considered illegal.

Violation of insider trading laws and regulations can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment. You are required to read carefully and observe our Insider Trading Policy. Please contact the Company's Legal Department with any questions you may have about insider trading laws. You can find the latest version of the Insider Trading Policy on TheFarm (Company intranet) or by contacting the Chief Compliance Officer or their designee if you do not have access to TheFarm.



Laws & Policies

Compliance with Anti-Corruption Laws

We comply with anti-corruption and anti-bribery laws globally (e.g., the U.S. Foreign Corrupt Practices Act (the "FCPA") and the UK Bribery Act. These laws prohibit offering, giving or promising money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government official, political party, candidate for political office or official of a public international organization. This prohibition also extends to payments to a third party intermediary if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. Indirect payments include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited.

In some countries, minor unpublished gratuities or "facilitating payments" used to expedite routine government procedures are customary. In fact, they may even be legal in some countries. However, the Company does not permit these types of payments and they are illegal under the U.K. Bribery Act.

Violation of the FCPA or UK Bribery Act is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment. Please refer to the Company's *FCPA Anti-Corruption Compliance Policy* for more information. If you are ever confronted with such a situation and have any questions about how to proceed, you should contact the Legal Department before taking any action.



Laws & Policies

Gifts, Entertainment, & Hospitality

Don't offer or accept anything that could influence – or appear to influence – a decision. You should accept or offer only modest, occasional gifts that are customary and lawful — never cash or lavish items. Under anti-bribery laws such as the FCPA and the U.K. Bribery Act, even small gestures may be perceived as attempts to influence decisions. When in doubt, politely decline and explain our policy.

Reasonable hospitality — such as a meal after a meeting or entertainment at an event— is acceptable when it supports a legitimate business purpose and doesn't create an expectation of favorable treatment. Always record such expenses accurately.

Reporting & Investigation of Violations

Actions prohibited by this Code involving directors or executive officers must be reported to the Audit Committee.

Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to the reporting person's supervisor or to the Company's Chief Compliance Officer or their designee.

After receiving a report of an alleged prohibited action, the Audit Committee, the Chief Compliance Officer or their designee, or the relevant supervisor must promptly take all appropriate actions necessary to investigate. All directors, officers and employees are expected to cooperate in any internal investigation of misconduct.

Prohibition on Retaliation

The Company does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, and any such retaliation may be a violation of the Company's *Whistleblower Policy*.

Laws & Policies

Enforcement

The Company must ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board.

If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor determines that a violation of this Code has occurred, the supervisor will report such determination to the Chief Compliance Officer or their designee.

Upon receipt of a determination that there has been a violation of this Code, the Board, or the Chief Compliance Officer or their designee, will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

Waivers

The Board (in the case of a violation by a director or executive officer) or the Chief Compliance Officer or their designee (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code.

Any waiver for a director or an executive officer shall be disclosed as required by SEC and NYSE rules. If the Company makes any amendment to, or grants any waiver from, a provision of this Code that applies to the Company's principal executive officer, principal financial officer or principal accounting officer that requires disclosure under applicable rules, the Company is required to disclose the amendment or waiver and the reasons therefore on the Company's website within four business days of the date of the amendment or waiver.

Acknowledgment & Certification

You are required to certify on an annual basis (or at such other intervals as the Company's Chief Compliance Officer or their designee deems appropriate) that you have received, read, and understand this Code and agree to follow it and the Company's related policies. New hires must certify their review and acceptance of the Code as part of the onboarding process.

Quick Reference

Quick Reference: Code of Conduct & Ethics (Summary)

This page summarizes key expectations. It does not replace the full Code.

- Lead with integrity; follow the law and Company policies.
- Protect confidential information and personal data.
- Remember that only authorized Company Spokespersons can make public communications on behalf of the Company; see the *Regulation FD Policy*.
- Use Company assets responsibly; report loss, theft, or misuse.
- Avoid and disclose conflicts of interest early; don't divert corporate opportunities.
- Compete fairly; never discuss or agree on prices, bids, or territories with competitors.
- Gifts/hospitality must be modest and lawful; cash or equivalents are never allowed. No bribes, kickbacks, or facilitation payments are ever acceptable; see the *FCPA Anti-Corruption Compliance Policy*.
- Insider trading and tipping are prohibited; see the *Insider Trading Policy*.

Report Concerns

For confidential, anonymous reporting use:

EthicsPoint Hotline at
+1 (833) 841-4115

Website
https://uponafarm.ethicspoint.com

Mobile App
https://uponafarmmobile.ethicspoint.com
with QR code: