

WHOLE EARTH BRANDS, INC.

GLOBAL CODE OF ETHICS

As adopted on May 27, 2022

INTRODUCTION

Conducting the business affairs of Whole Earth Brands, Inc. (together with its subsidiaries, the “**Company**”) in accordance with the highest ethical standards and in compliance with legal requirements aligns directly with our mission of enabling healthier lifestyles to delight customers through our diverse portfolio of trusted brands and delicious products. Our reputation is built on the decisions we make and how we conduct ourselves individually and as a Company. We are committed to our stakeholders and broader community to act ethically and with the utmost integrity.

The Board of Directors of the Company (the “**Board**”) has adopted this Code of Ethics (this “**Code**”) in order to deter wrongdoing and promote:

1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “**SEC**”) and in other public communications made by the Company;
3. compliance with applicable governmental laws, rules and regulations;
4. the protection of Company assets, including corporate opportunities and confidential information;
5. fair dealing practices;
6. the prompt internal reporting of violations of this Code to an appropriate person or persons identified in this Code; and
7. accountability for adherence to this Code.

WHO IS RESPONSIBLE?

This Code applies to all directors, officers and employees around the world, including employees of our domestic and foreign subsidiaries (“you” or “employees”) while working on our premises, at offsite locations where our business is being conducted, at Company-sponsored business and social events, or at any other place where you are a representative of the Company. You are required to read, understand and be familiar with this Code, comply with its provisions, uphold these standards in day-to-day activities, comply with all applicable policies and procedures, and ensure that all agents, contractors and representatives are aware of, understand and adhere to these standards and report any suspected violations

as described below.

In addition to this Code, the Company and your business unit may have other more specific policies that apply to certain situations and to your location (to the extent not inconsistent with the provisions of this Code) but this Code supersedes any other policy documents setting forth rules of conduct or ethics adopted by the Company. Because the principles described in this Code are general in nature, you must also read, understand and comply with these other policies, and the policies and procedures referenced herein and in the Company's *Employee Handbook*. To the extent you believe there is a conflict or inconsistency between this Code and any written policy of the Company or your business unit, or between this Code and any agreement between you and the Company, please contact your supervisor, your business unit's Human Resources representative, or the Legal Department.

Nothing in this Code is intended to require any action contrary to law. If the Code conflicts with any law, you must comply with the law. Nothing in the Code is intended or will be considered (i) to amend the certificate of incorporation or bylaws of the Company, (ii) to change the legal duties imposed under state, federal and other applicable statutes, rules and regulations, (iii) to expand liabilities beyond applicable law, (iv) to create or imply an employment contract or term of employment, or (v) to affect any rights available under state and other applicable law or the Company's certificate of incorporation or bylaws.

Nothing in this Code is intended to interfere with your right to speak about matters of wrongdoing which are of a public concern or to engage in trade union, works council, labor organization or collective bargaining activities that are protected under the employment laws of the countries in which we operate. In addition, nothing in this policy prevents you from providing information to government authorities regarding possible legal violations.

HONEST AND ETHICAL CONDUCT

We promote high standards of integrity by conducting our affairs honestly and ethically.

You must act with integrity and observe the highest ethical standards of business conduct in your dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom you have contact in the course of performing your job.

IN THE WORKPLACE

We recognize that the Company's greatest strength lies in the talent and ability of its employees. We expect you to hold yourself accountable to the highest professional standards, with professional relationships based on mutual respect. We respect the workplace laws of each jurisdiction in which we do business. Included among these laws are equal employment opportunity statutes, environmental laws, drug-free workplace mandates, and rules or regulations promoting a work environment that is free of discrimination and harassment.

FAIR AND EQUITABLE TREATMENT OF EMPLOYEES

We treat employees equally, regardless of race, color, creed, religion, gender, national origin, citizenship,

veteran status, sexual orientation, age, disability, gender identity, or other protected classification. We make all employment decisions, such as hiring and promotion, based solely on an employee's qualifications and performance, and we promote equal opportunity for all qualified individuals. We treat each other with the same respect and fairness that we expect to receive. This holds true both inside and outside the workplace.

DIVERSITY

As a Company with divisions that do business around the world, we have employees who hail from a variety of backgrounds, cultures and nations. We are proud of this and strive to ensure that we have an inclusive and diverse team. Each of us is responsible for respecting the diversity of individuals and cultures among our employees and within the communities in which we operate.

ANTI-DISCRIMINATION, ANTI-HARASSMENT

We do not tolerate *any* form of harassment, whether directed at a fellow employee, a customer or a vendor or any other third party. This includes any harassment based on gender, race, color, creed, religion, national origin, citizenship, veteran status, sexual orientation, age, disability, gender identity, or other protected classification. We do not tolerate any verbal or physical conduct that disrupts or interferes with another's ability to do his or her job or that creates a hostile work environment. This includes inappropriate contact, leering, language, pictures, communications (whether written, electronic, or telephonic) or any other personal interaction.

We prohibit and do not tolerate any form of sexual harassment. Sexual harassment may include: (a) any differential treatment because of an employee's gender; and (b) unwelcome sexual advances, requests for sexual favors, and any other verbal, non-verbal, or physical conduct of a sexual nature that has the effect of unreasonably interfering with an employee's work performance or which creates a hostile, offensive, or intimidating work environment for a reasonable individual.

You must comply with all anti-discrimination, anti-retaliation, and anti-harassment Company policies and laws whether local, state or federal. Management encourages you to report any instance of harassment.

HEALTH AND SAFETY, ANTI-VIOLENCE

We are committed to eliminating workplace hazards, providing our employees with a safe and healthy work environment and complying with all occupational safety and health laws and standards, including the Occupational Safety and Health Act. You must promptly report any adverse health or safety incident or condition—whether in the office, a manufacturing facility, or any other Company facility—including broken equipment or machinery, potentially hazardous substances and accidents.

The illegal use or abuse of drugs, inhalants or alcohol can impair job performance, jeopardize the safety of others and expose the Company to legal risks. The illegal use or abuse of drugs includes abusing your own prescription drugs and using prescription drugs not prescribed for you. Moreover, you may not be under the influence of alcohol while conducting Company business. We are committed to maintaining a work environment free from the illegal use and abuse of drugs and alcohol, and may take necessary action, including termination, in response to any violation of this Code.

Engaging in any acts or threats of violence or conduct that could cause another individual to feel threatened or unsafe are prohibited. You may not possess a firearm or other weapon while on Company property or while conducting Company business, regardless of whether you are licensed to carry such a weapon. This prohibition applies to behavior of all of our employees as well as third parties, including visitors, on Company premises, as well as to the behavior of our employees, customers, vendors, suppliers and temporary personnel engaged in Company business anywhere in the world outside of our premises. You have an obligation to speak up and report unusual or concerning behavior, threats or potential violence immediately to your supervisor or your business unit's Human Resources representative.

ENVIRONMENTAL COMPLIANCE

We recognize our obligation as a good corporate citizen to conduct all of our activities in ways that preserve and promote a clean, safe and healthy environment. You must comply strictly with, and ensure that Company activities meet the letter and spirit of applicable environmental laws and regulations.

No employee may enter or provide any information known to be false on any governmental environmental form, on any monitoring report or in response to any request for environmental information from any governmental or regulatory agency. The laws and regulations in this area are complex, and violation can result in severe criminal and civil penalties for the Company and its employees. If you are faced with an environmental compliance issue, you should contact your supervisor or the Company's Legal Department.

REPORTING AND INVESTIGATION OF VIOLATIONS

If you have any questions about the requirements of this Code or discover events of a questionable, fraudulent or illegal nature that are, or you believe in good faith may be, in violation of law, this Code or any other Company policy, you must immediately report your questions or concerns.

Where practicable, and except as otherwise provided in the Code, you should first address any issue with your supervisor. Your supervisor will often have the most relevant information for your business unit and may be in the best position to offer guidance.

If, however, your supervisor is unavailable or is unable to answer your question or concern, or if, for other reasons, it would be inappropriate or impractical to address the matter to your supervisor (e.g., if your question or concern relates to your supervisor), you should contact your business unit's Human Resources representative, the Company's Legal Department, or the Chair of the Board's Audit Committee. You may also report your concern via **Company's Reporting Hotline by phone or website submission**, and can be made anonymously.

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

In some countries where we have operations, local laws or regulations may prohibit or discourage strict adherence to this Code or anonymous reporting of violations. Therefore, if you work outside the United States, you should consult with your business unit's Human Resources representative to determine

whether anonymous reporting is permitted and you should consult all special rules that apply to reporting a violation in your country.

After receiving a report of an alleged prohibited action, the Board's Audit Committee (if applicable), the Human Resources Department, the Legal Department or the relevant supervisor must promptly take all appropriate actions necessary to investigate.

PROHIBITION ON RETALIATION

We do not tolerate acts of retaliation against any 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 also be a violation of the Company's *Whistleblower Policy*.

For detailed information on any of the policies applicable in the workplace, please consult the Company's *Employee Handbook*.

IN THE MARKETPLACE

We are on a mission to enable wellness seekers to enjoy a range of delicious foods and beverages by offering natural alternatives and clean label products. We do this through the creation and distribution of branded products and ingredients that align with consumers' rapidly increasing preference for healthier alternatives and plant-based products.

SAFETY AND PRODUCT QUALITY

Food Safety and Product Quality are key to our mission and we are committed to produce high-quality products across all our brands. We assure quality throughout the supply chain from the purchase of ingredients until the finished product reaches our consumer. If you are involved in any aspect of developing, producing, handling or storing our products, you must:

- know the food safety and product quality standards, policies and procedures that apply to the products produced at your location;
- follow good manufacturing practices and testing protocols; and
- comply with all applicable food safety laws and regulations.

If you see or suspect anything that could compromise product safety or quality, whether accidental or intentional, speak up and report it immediately.

RESPONSIBLE MARKETING

We market our products accurately and transparently to all consumers. You are expected to always represent our products truthfully, responsibly, and in adherence to all relevant laws and regulations in the countries where we operate. If your work involves marketing, be sure to follow local review and approval process for consumer facing content. You must never:

- overstate or misrepresent the qualities of our products or packaging;

- use misleading or untruthful statements in advertising or on labels; or
- make claims, including claims about health effects, our products or product ingredients, without adequate substantiation and proper legal clearance.

CUSTOMERS

You must treat our customers ethically, fairly, and earn their business on the basis of our quality products, superior customer service and competitive prices, and never engage in unfair or deceptive trade practices. Our contracts with customers must always reflect the importance and value we place on their business. Act in a manner that creates value for our customers and helps to build a relationship based upon trust. We have provided products and services for many years and have built up significant goodwill over time. This goodwill is one of our most important assets, and you must act to preserve and enhance our reputation.

SUPPLIERS

We are committed to responsible sourcing with responsible suppliers. Our suppliers include any third-party vendor, consultant, contractor, service provider, or supplier of raw materials, ingredients or packaging components. If you are responsible for selecting a supplier, you should base your decision on need, merit, price, quality of service and reputation. When selecting and retaining suppliers, you must adhere to policy guidelines and ethical business practices, and you must:

- follow our selecting and contracting processes;
- perform, if applicable, appropriate due diligence; and
- avoid potential or actual conflicts of interest with suppliers, and never offer unlawful incentives, such as “kickbacks.”

SOCIAL MEDIA

Social media provides inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website or social media is available to the public and, therefore, the Company has established the guidelines for employee participation in social media.

For details on the Company’s *Social Media Policy*, please consult Company’s *Employee Handbook*.

IN BUSINESS

Our Code requires you to be honest on all business activities, always putting the Company’s interests first. You must be accountable in financial record-keeping and safeguard company assets. You should only speak on behalf of the Company if you are authorized to do so and always follow our policies when representing our Company.

CONFLICTS OF INTEREST

A conflict of interest occurs when an individual’s private interest (or the interest of a member of his or her family) interferes, or even appears to interfere, with the interests of the Company as a whole. A

conflict of interest can arise when you (or a member of your family) take actions or have interests that may make it difficult to perform your work for the Company objectively and effectively. Conflicts of interest also arise when you (or a member of your family) receive improper personal benefits as a result of your position in the Company. For detailed information consult the Company's *Related Party Transactions Policy*.

Loans by the Company to, or guarantees by the Company of, your or your family members' obligations are of special concern and could constitute improper personal benefits depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of, your or your family members' obligations are expressly prohibited.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

If you are not a Board director or a Company executive officer and have questions about a potential conflict of interest or if you become aware of an actual or potential conflict you should discuss the matter with, and seek a determination and prior authorization or approval from, your supervisor or the Company's Legal Department. If you are a supervisor you 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 Legal Department with a written description of the activity and seeking the Company Legal Department's written approval. If you are a supervisor and you are yourself involved in the potential or actual conflict, discuss the matter directly with the Legal Department.

If you are a Board director or a Company executive officer you must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Board's Audit Committee.

CORPORATE OPPORTUNITIES

We owe a duty to the Company to advance its interests when the opportunity to do so arises. You are prohibited from taking for yourself personally opportunities that are discovered through the use of Company property, information or position. You may not use Company property, information or position for personal gain. In addition, you may not compete with the Company.

CONFIDENTIALITY

The Company's confidential information is a valuable asset. You should maintain the confidentiality of information entrusted to you by the Company or by its customers, except when disclosure is authorized or legally mandated. Confidential information includes, but is not limited to, all non-public materials, know-how, projections, financials, sales information, formulas, recipes, intellectual property, manuals, strategic plans and other business plans. If you have any questions about what constitutes confidential information, please contact the Company's Legal Department for clarification.

You have the responsibility to safeguard, secure and properly dispose of confidential information in accordance with agreements in place and the Company's *Record Retention Policy*. This obligation extends to confidential information of third parties, which the Company has rightfully received under nondisclosure agreements.

In addition to safeguarding the Company's confidential information, you shall only use such information in connection with your role and responsibilities on behalf of the Company. Information is "non-public" if the Company has not publicly disclosed it. Information should be considered non-public unless you can point to some specific fact or event indicating that the information has been generally disseminated to the public, such as disclosure in a press release or in publicly filed documents. Information that has been made public by the Company, such as press releases, news articles, or advertisements, is not considered confidential and does not require protection.

The Company's *Regulation FD Policy* describes who may communicate information to the press and the financial analyst community. All inquiries or calls from the press and financial analysts should be referred to the Company's Authorized Spokespersons identified in the Company's *Regulation FD Policy*.

COMPETITION AND FAIR DEALING

You should endeavor to deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom you have contact in the course of performing your job. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

We seek to fairly and honestly outperform our competition. You are not permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal activities.

Antitrust laws in the United States and other countries are intended to preserve a free and competitive marketplace. We require full compliance with these laws. You must not discuss with competitors how the Company prices, markets, services or otherwise competes. Antitrust laws are complex and can be difficult to understand. You should seek advice from the Company's Legal Department when dealing with antitrust issues.

TRADE CONTROLS

From time to time, the United States, foreign governments, and the United Nations have imposed boycotts and trading sanctions against various governments and regions, which must be obeyed. Advice regarding the current status of these matters must be obtained from the Company's Legal Department.

BUSINESS GIFTS

This section addresses our policies and rules with respect to gifts and entertainment given to or provided by customers, suppliers, and others in the **private sector**. We established a separate *Anti-Corruption Policy* which addresses gifts, entertainment and payments of any type to government officials, which you must read and follow.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers or suppliers and against competitors. Inexpensive gifts, infrequent business meals, celebratory events and entertainment, provided that they

are not excessive or create an appearance of impropriety may be acceptable under certain circumstances. Unacceptable offers are those that are lavish or extravagant, given to win a favor or to influence a decision, or that are in cash or some cash equivalent.

The nature and cost of a business gift or entertainment given or received must always be accurately recorded in the Company's books and records. Questions regarding whether a particular gift violates the Code should be directed to your business unit's Human Resources representative or the Company's Legal Department.

POLITICAL CONTRIBUTIONS

You cannot use or contribute Company's funds or assets (directly or through trade associations) to political campaigns, candidates or political parties without the prior written approval of the Company's Chief Executive Officer, Chief Financial Officer and General Counsel. This includes (1) any contributions of Company funds or other assets for political purposes, (2) encouraging individual employees to make any such contribution, or (3) reimbursing an employee for any contribution.

The Company's policy is not intended to discourage or prohibit you from voluntarily making personal political contributions, participating in the political process on your own time and at your own expense, expressing your political views or engaging in any other lawful political activity, consistent with the law. However, you are prohibited from using your position with the Company or the Company's assets to try to influence others in their personal decisions to support particular political parties or candidates.

LOBBYING

When dealing with government officials—either directly or through third parties—many routine activities in which business people engage can be considered “lobbying” and are thus subject to various lobbying laws. Examples include advocating to state legislators legislation that would lower the state's sales tax for one of the Company's products or advocating to any governmental body—federal, state, local or foreign—for the Company's ability to build and operate a plant, distribution center or other facility in an area that previously was off-limits. Not all of these activities constitute lobbying in all jurisdictions, but some may. Our policy is to comply with all applicable lobbying laws. You should not undertake any lobbying effort or contract in the Company's name or on the Company's behalf without the prior approval of the Company's Chief Executive Officer, Chief Financial Officer and General Counsel.

PROTECTION AND PROPER USE OF COMPANY ASSETS

You should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and are prohibited. You may only use Company assets for legitimate business purposes. Report for investigation any suspected incident of fraud or theft.

We have established procedures for physical access controls to ensure maintenance of the security of the Company's tangible and intangible assets. You are personally responsible for complying with the level of access control that has been implemented in the facility where you work on a permanent or temporary basis.

The obligation to protect Company assets includes the Company's physical property, electronic assets, personal data, financial assets and also intangible assets as our proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, brand names, logos, creative materials, engineering and manufacturing ideas, designs, databases, records and any non-public financial data or reports, other assets related to finances. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

You should comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities, states and countries in which we operate.

Our operations are subject to laws and regulations both in the United States and in other countries. Our core values demand that we ensure diligent adherence to the requirements of all applicable laws, rules and regulations. Significant areas of law that could be applicable to the activities of the Company include, but are not limited to (i) privacy and data security/protection laws; (ii) patent and trademark laws; (iii) anti-trust laws governing free and open competition; (iv) health, safety and environmental laws; and (v) federal securities laws.

In addition to the areas addressed above, we require full compliance with the Foreign Corrupt Practices Act ("**FCPA**"), which makes illegal any corrupt offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official, or any foreign political party, candidate or official, for the purpose of (i) influencing any act or failure to act, in the official capacity of that foreign official or party or (ii) inducing the foreign official or party to use influence to affect a decision of a foreign government or agency; in order to obtain or retain business for anyone, or direct business to anyone. You, regardless of your work location, are responsible for FCPA compliance and the procedures to ensure FCPA compliance, as set forth in Company's *Anti-Corruption Policy*.

Although you 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 from appropriate personnel. You can address questions about compliance to the Company's Legal Department.

RECORD KEEPING, FINANCIAL CONTROLS AND DISCLOSURES

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and the applicable rules and regulations promulgated by the SEC.

If you contribute in any way to the preparation or verification of the Company's financial statements and other financial information you must ensure that the Company's books, records and accounts are accurately maintained. All employees must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

All employees who are 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 condition of the Company provide full, fair, accurate, timely and understandable disclosure.

All of the Company's books, records, accounts and financial statements must be maintained in detail; must appropriately reflect the Company's transactions; and must be made promptly without false or misleading information. If you become aware of any inadvertent or unauthorized disclosure of information discussed in this Section, you must notify the Company's Legal Department immediately.

If you have concerns or complaints regarding accounting or auditing matters of the Company, then you are encouraged to submit those concerns by one of the methods described in the "Reporting and Investigation of Violations" section of this Code.

INSIDER TRADING

All non-public information about the Company should be considered confidential information. If you have access to confidential information about the Company or any other entity you are not permitted to use or share that information for trading purposes or for any other purpose except to conduct Company business, as described in the Company's *Insider Trading Policy*. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision based on this information is unethical, illegal and a violation of the Company's *Insider Trading Policy*. If you have any questions, please consult with the Company's Legal Department or Investor Relations Department or with your personal legal counsel, when appropriate.

ENFORCEMENT AND AMENDMENT

We 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 Board's Audit Committee determines that a violation of this Code has occurred, the Board's 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 Company's Legal Department.

Upon receipt of a determination that there has been a violation of this Code, the Board or the Company's Legal Department or Human Resources Department 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.

We are committed to continuously reviewing and updating policies and procedures. Therefore, this Code may be amended, modified or waived by the Nominating and Corporate Governance Committee of the Board. This Code supersedes all other such codes, policies, procedures, instructions, practices, rules or written or verbal representations to the extent they are inconsistent.

WAIVERS

The Board (in the case of a violation by a Board director or a Company executive officer) or the Human Resources Department or the Legal Department (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code. Any waiver for a Board director or a Company executive officer shall be disclosed as required by SEC and Nasdaq rules.

Note: Nothing in this Code is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the National Labor Relations Act to engage in protected concerted activities with other employees to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits.

Supersedes Code of Conduct and Ethics Effective Date(s): All Codes of Conduct and Ethics prior to May 27, 2022.