



**Tree Top, Inc.**  
**Code of Business Conduct and Ethics Policy**

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***Introductory Statement***

Tree Top's Mission is to continually evolve our products and practices so that we are the processor of choice for growers, the brand of choice for consumers and the supplier of choice for our customers.

We uphold our Values and strive to achieve our cooperative's Vision to inspire all of us to be the very best version of ourselves through an uncompromising commitment to our Team and our Values.

We are a fruit-processor and farmer-owned cooperative. Most of our fruit comes directly from our growers' orchards. We produce consumer packaged goods such as apple juice and apple sauce sold into retail stores and outlets as well as the foodservice industry. We also supply many of the world's leading food manufacturers with the widest array of fruit-based ingredients for use in bakery, snack foods, cereals, and dairy products.

Our Values drive our daily conduct and our business practices.

***Tree Top's Values***

***FUN.*** We have fun. We celebrate success, see the value in what we do and appreciate one another. We are one team and value each other's unique characteristics, perspectives and skills.

***TRUST.*** We trust each other. We are humble, truthful and respectful. We communicate directly and follow through on our words with action.

***CUSTOMER DRIVEN.*** We are customer driven. Customers are at the heart of every decision we make, every day, both internally and externally. We are committed to providing safe, healthy food, and we're intelligently flexible.

***EXCELLENCE.*** We are passionate in our pursuit of excellence. We are a knowledge-based company that promotes energizing and creative ideas. We make every process simple and effective. We focus on solutions, continuously improve and lead by example.

***TEAMS & COMMUNITIES.*** We make our teams and communities better by our actions. Your top priority is your family. That's why we prioritize the flexibility needed to achieve a work-life balance and to ensure the health and safety of our team members. We equip and empower our team, operate sustainably and invest in the communities where we live and work.

This Code of Conduct and Ethics Policy applies to Tree Top and its subsidiaries, over which Tree Top has management control. It also applies to every employee, officer, and director of these companies.

## **1. *Respect for our Employees***

We believe our most important strength is our employees. We seek to provide a work environment where all employees have the opportunity to reach their full potential and contribute to Tree Top's success. We emphasize personal integrity and believe long-term results are the best measure of an employee's performance.

Tree Top respects the human rights and the dignity of all employees. We endeavor to treat our employees fairly and honestly. We strive to maintain a safe, secure and healthy workplace and it is against our policy to use forced or child labor. We also strive to follow all applicable employment laws and regulations.

We are committed to equal opportunity in all aspects of employment for employees and applicants. This means providing a workplace free from any form of discrimination or harassment, including sexual harassment. We seek to create a work environment where people feel comfortable and respected, regardless of individual differences, talents, or personal characteristics. Our objective is for the diversity of our employees to reflect the diversity of the population wherever we operate and for the performance of all employees to be judged fairly and based on their contribution to our results.

Tree Top encourages an inclusive culture, which enables all employees to do their best. This means we:

- Welcome and embrace the strengths of our differences,
- Treat each other with respect and fairness, and
- Foster an atmosphere of trust, open communications and candor.

We recognize the needs of individuals to achieve professional and personal balance in their lives. We also respect employee privacy and will acquire and retain only that employee personal information which is required for operation of the Company's business or required by law.

## **2. *Human Rights***

Human rights are a very complex subject and may encompass everything from labor laws and treatment of employees to taking steps to help eradicate slavery or human trafficking throughout the world.

While governments and many national and international non-governmental organizations have a primary role in protecting human rights, it is understood that every business and individual can make a difference.

Human trafficking and slavery are serious offences against humans and Tree Top expects its employees and suppliers to comply with all applicable state and governmental laws in the countries in which they are doing business.

Human trafficking is the illegal trade of human beings for the purposes of reproductive slavery, commercial sexual exploitation, forced labor, or a modern-day form of slavery. The Protocol to

Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (also referred to as the Trafficking Protocol) was adopted by the United Nations in Palermo, Italy in 2000, and is an international legal agreement attached to the United Nations Convention against Transnational Organized Crime.

In January 2012, the California Transparency Act (CATA) required companies doing business in California with more than \$100,000,000 in world-wide gross receipts to comply with the law by posting clearly to the company's website how they are, or are not, addressing each of the items numbered below. Tree Top must comply with the CATA and maintains its compliance response on the Tree Top website.

### **3. Consumers, Customers, Suppliers and Competitors**

We are committed to the continuation of free enterprise and the legal and regulatory frameworks that support it. Therefore, we recognize the importance of laws which prohibit restraints of trade, predatory economic activities and unfair, deceptive or unethical business practices.

In all of our business dealings with consumers, customers, suppliers and competitors, we will:

- Avoid any unfair or deceptive practice and always present our services and products in an honest and forthright manner.
- Treat all customers and suppliers honestly, fairly and objectively.
- Select suppliers based on merit and make clear to all suppliers that we expect them to compete fairly and vigorously for our business.
- Compete vigorously and with integrity.
- Never comment on a competitor's product without a good basis for such statements.
- Comply with all competition laws, including those prohibiting agreements or understandings with competitors to fix prices or other sales terms, coordinate bids or divide sales territories, customers, or product lines. These types of agreements with competitors are generally illegal in the United States where we conduct business.

### **4. Global Relations**

At Tree Top, we firmly believe international commerce strengthens stability and peace by fostering economic growth, opportunity, and mutual understanding. While we do not maintain business entities in foreign countries, we purchase supplies from global sources, and export products around the world. We recognize our responsibility to conduct our interactions in accordance with the applicable laws of the countries in which we do business.

### **5. Business Gifts and Entertainment**

Our business decisions are made on merit. Therefore, we will never give or offer, directly or indirectly, anything of value to a third party, including a government official, political party or candidate, to corruptly influence that person's business decision or gain an unfair advantage.

Giving gifts or entertainment to governmental officials is highly regulated and often prohibited. Such gifts and entertainment are prohibited unless they have been pre-approved by Tree Top's Legal Counsel and deemed in accordance with law.

Gifts or entertainment given to or received from customers or suppliers must never influence, or

appear to influence, business decisions. There must be a legitimate business purpose for any business gift or entertainment, it must be in good taste and it must be consistent with the law, with the giver's and receiver's policies including Tree Top's policies and a department's policies (including the Travel Policy). Business gifts must be nominal in value and frequency. Customer and supplier meals and entertainment must be reasonable in cost and frequency and consistent with guidelines established by Tree Top's Finance Department.

## **6. Health and Safety**


Tree Top is committed to providing safe and healthy work environments at its facilities for all employees, visitors, contractors and vendors. It is our policy to provide employees with a drug - free workplace. In order to create an environment free from threats, violence and intimidation, we are committed to a policy of zero tolerance for violence or harassment.

We are dedicated to designing, constructing, maintaining and operating facilities that protect our people and physical resources. It is our policy to comply with all applicable health and safety laws and regulations, provide and require the use of adequate protective equipment and measures, and insist that all work be done in a safe and responsible manner. It is the responsibility of each employee to follow all company policies and procedures related to workplace health and safety.

## **7. Environment**

Tree Top is committed to being an environmentally responsible corporate citizen. We are committed to minimizing the impact of our businesses on the environment with methods that are socially responsible, scientifically based and economically sound. We encourage conservation, recycling and energy use programs to promote clean air and water, to reduce landfill wastes and to replenish the planet's natural resources. We will follow applicable environmental laws and regulations where we operate.

Signature: \_\_\_\_\_

  
Craig Green, President and CEO  
Tree Top, Inc.

Date: \_\_\_\_\_

1/9/24