

Introduction

Our Code of Business Conduct (“Code”) is designed to clearly articulate the basic guidelines upon which all of our business decisions are based. GoBrands, Inc. (“GoBrands” or “Company”) directors, officers, employees, consultants, agents, and representatives (collectively, “Company Personnel”) must comply with all applicable laws and regulations and observe the highest standards of business ethics. GoBrands directors, officers, employees, consultants, agents, and representatives must be honest, objective, and diligent in the performance of their duties and responsibilities.

Managers shall be responsible for the enforcement of and compliance with our policies, including distributing and making them available to their teams. A Company Personnel shall be familiar with the Code, comply with its provisions and report any suspected violations.

1. REPORTING MISCONDUCT

The Company proactively promotes ethical behavior and encourages Company Personnel to promptly report any behavior that you believe is or might be a violation of applicable law, this Code, or our policies. Managers have a mandatory reporting obligation for sexual harassment allegations. Reports can be made through the following channels:

- to your line manager;
- to your H.R. Business Partner;
- to Ethics & Compliance (EthicsCompliance@gopuff.com); or
- through our Ethics & Compliance Helpline.

Our Ethics & Compliance Helpline is a secure means of reporting behavior that you believe is or might be a violation of applicable law, this Code, or our policies. The Ethics & Compliance Helpline is available 24 hour/7 days a week. You can either call toll-free at 1-(844) 232-2542 or submit your report online at <https://gopuff.ethicspoint.com>. Reports can be submitted anonymously.

2. NO RETALIATION

The Company prohibits and will not tolerate any threatened or actual retaliation against any person who, in good faith, (a) raises concerns (b) formally or informally reports to the Company, (c) assists another to report to the Company, (d) participates in an investigation or legally protected litigation regarding a potential violation of applicable laws or regulations, this Code, or Company policies. Any form of retaliation or adverse action against Company Personnel for reporting any suspected violations or improper activities in good faith or for participating in a complaint investigation will not be tolerated and is expressly prohibited.

3. HONEST AND ETHICAL CONDUCT

The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically. All Company Personnel must act with integrity and observe the highest ethical standards of business conduct in their dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact while performing his or her job.

4. ENVIRONMENTAL HEALTH AND SAFETY

The Company is committed to creating a safe working environment. It is the responsibility of all Company Personnel to perform work in accordance with safe standards and practices.

5. DIVERSITY AND INCLUSION

GoBrands believes that our greatest strength is the diversity of our people. We are focused on recruiting, hiring, and developing the very best talent regardless of their gender, race, ethnicity, sexual orientation, or any other characteristic or trait that makes our people unique. We strive to create a working environment where all Company Personnel feel comfortable being their authentic selves.

6. HARASSMENT AND DISCRIMINATION

GoBrands takes harassment and discrimination very seriously and all complaints of discrimination and harassment will be promptly investigated. Company personnel who manage or supervise others do have additional responsibilities to report violations. Harassment is unwelcome conduct that is based on race, color, religion,

sex (including sexual orientation, gender identity, or pregnancy), national origin, age, disability, or genetic information. Discrimination is the unjust or prejudicial treatment of an individual based on race, color, religion, sex, pregnancy, national origin, sexual orientation, gender identity, age, disability, or genetic information. The Company prohibits discrimination and/or harassment in any form – verbal, physical, or otherwise. Refer to the Company's [Anti-Harassment & Anti-Discrimination Policy](#) (contained in our [Employee Handbook](#)) for more information.

7. COMPLIANCE WITH ANTI-CORRUPTION LAWS

The Company has a zero-tolerance attitude towards all forms of corruption and bribery and will take all necessary steps to ensure that corruption and bribery do not occur. All Company Personnel and third parties acting on behalf of the Company are prohibited from soliciting, accepting, or offering any bribe on behalf of themselves or the Company. Refer to the Company's [Global Anti-Corruption Policy](#) or contact Ethics & Compliance for more information.

8. CONFLICTS OF INTEREST

A conflict of interest occurs when:

- An individual's private interest (or the interest of a member of his/her/their family) interferes, or even appears to interfere, with the interests of the Company;
- Any Company Personnel (or a member of an individual's family) takes actions or has interests that may make it difficult to perform their work for the Company objectively and effectively;
- Company Personnel (or a member of their family) receive improper personal benefits as a result of their position; and when
- Company Personnel take for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of Company assets, property, information or position.

A conflict of interest may not use Company assets, property, information or position for personal gain (including gain of friends or family members). In addition, no

Company Personnel may compete with the Company while they are employed or providing services to the Company (or for such a longer period of time as may be provided in a separate agreement).

Whether or not a conflict of interest exists or could exist can be unclear. While a conflict of interest should be avoided, a conflict waiver can be sought, but is dependent on the specific circumstances. If you have any questions about a potential conflict of interest, or if you become aware of an actual conflict, you should contact Ethics & Compliance or report the potential conflict via the Ethics & Compliance Helpline.

9. USE OF COMPANY ASSETS

All Company Personnel 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. All Company assets should be used only for legitimate business purposes. Any suspected incident of fraud or theft should be reported to Ethics & Compliance immediately.

The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property, such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, product ideas, designs, databases, records and any non-public financial data or reports. Unauthorized use or distribution of this information is prohibited.

10. CONFIDENTIALITY

Company Personnel must maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers or partners, except when disclosure is expressly authorized or legally required. Confidential information includes all nonpublic 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. The obligation to preserve confidential information continues even after Company Personnel leave the Company.

11. FAIR DEALING

Company Personnel, in carrying out their duties and responsibilities, must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact in the course of performing his or her job. Company Personnel are strictly prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice. Additionally, we only select partners who not only provide the best value for our Company, but also safeguard our reputation for excellence.

12. BOOKS, RECORDS AND CONTROLS

The integrity, accuracy, and reliability of the Company's books and records must be maintained at all times. Payments must be accurately and timely recorded. False, misleading, incomplete, inaccurate, or artificial entries in the Company's books and records are strictly prohibited. Business records shall accurately reflect transactions and no transaction shall be entered into with the intention of it being documented or recorded in a deceptive manner. Similarly, all funds, assets and transactions must be disclosed and recorded in the appropriate books and accounted for properly and punctually.

13. EXTERNAL COMMUNICATION

It is essential that any information disclosed publicly is accurate and consistent with our approved messaging and in the best interest of the Company. We have a responsibility to protect the Company's confidential information and reputation, including when engaging on social media. With that in mind, it is important to remember that only a limited number of key personnel are authorized to communicate with the media on behalf of the Company. No Company personnel should respond to media inquiries or give interviews, speeches or make presentations on behalf of the Company, without prior authorization of the VP of Communications. Company Personnel who are not authorized to talk to the media on behalf of the Company can forward media inquiries to press@gopuff.com. Refer to the Company's [Media Policy](#) and [Social Media Policy \(contained in our Employee Handbook\)](#) for more information.

ADMINISTRATION

Questions about this Code should be directed to Ethics & Compliance. This Code is reviewed periodically to determine whether revisions may be needed. Company Personnel who violate this Code or authorize or allow a subordinate to violate it will be subject to discipline, up to, and including, termination.