

# **JOHN B. SANFILIPPO & SON, INC.**

## **CODE OF CONDUCT**

### **PURPOSE OF THE CODE:**

Our Code of Conduct (the “Code”) is a tool to assist all employees, executive officers and members of the Board of Directors (collectively “Associates”) of John B. Sanfilippo & Son, Inc. (“JBSS” or the “Company”) to successfully meet the Company’s high ethical standards. This Code is applicable to all JBSS Associates. The Code sets forth the standards of conduct that all JBSS Associates must follow when on the job or conducting business for or acting on behalf of the Company. The Code goes well beyond legal minimums by describing the high ethical values we share as JBSS Associates. The Code is not intended to be a contract or a comprehensive manual that covers every situation that may occur. It is a guide that highlights key issues and identifies policies, practices, and resources to help JBSS Associates know when to seek guidance and reach decisions that will make JBSS a stronger and more ethical organization.

This Code is also intended to create and maintain an atmosphere and culture of honesty, integrity and high ethical and legal standards in all of our business dealings. Furthermore, all Associates should endeavor to conduct business with only those other parties who conduct business in accordance with the spirit of the ethical standards set forth in this Code.

### **COMPLIANCE WITH LAWS AND REGULATIONS:**

JBSS conducts business in accordance with all laws and regulations. Associates must follow applicable laws, rules and regulations at all times. Mere compliance with the law does not encompass our entire ethical responsibility; rather it defines the minimum essential performance of our responsibilities. Our commitment is much deeper and more encompassing.

### **CONFLICTS OF INTEREST:**

A conflict of interest may arise when you are influenced by considerations of gain or benefit to you, your relatives, or any other acquaintances with whom you are familiar, which may conflict with your obligation to serve JBSS’s best interest. A conflict of interest is generally any activity or arrangement that is, or appears to be, opposed to the best business interests of JBSS. Conflicts of interest include but are not limited to the following examples:

- Having a material financial interest in any other business entity where that interest might conflict or interfere with JBSS’s business interests.
- Accepting valuable or significant personal gifts of equipment, money, discounts, trips, entertainment or favored treatment from any actual or potential JBSS customers, suppliers, competitors, or vendors.

All Associates must be aware of potential conflicts of interest and situations that might appear to be a conflict of interest and avoid any conflicts at all times. If there is any question in your mind, it is imperative that you consult with our Human Resources Department.

### **FRAUD AND THEFT:**

Since the stock of JBSS is publicly traded, it is every Associate’s duty to ensure that the financial information and non-financial information that it provides to the investing public is accurate and timely. You must not engage in a fraudulent activity or other inappropriate conduct that would be inconsistent with this financial disclosure requirement. Moreover, Associates have a duty to report any such fraudulent activity or other inappropriate conduct that they are aware of in a timely manner. JBSS has implemented a system whereby an employee with such knowledge of fraud or other inappropriate conduct can communicate this information anonymously and directly to the Audit Committee of the Board of Directors of JBSS. Information regarding the access to this anonymous reporting system can be found on our website at [www.jbssinc.com](http://www.jbssinc.com) or through our Human Resources Department.

Theft or causing, enabling, or failing to report known or suspected theft of money, goods and services from JBSS or any other party associated with JBSS, such as vendors, suppliers and customers, and fraudulent and deceptive business dealings with any party, are strictly prohibited.

**APPROPRIATE USE OF ELECTRONIC AND OTHER COMPANY RESOURCES:**

All electronic and other resources of the Company are intended for the purpose of carrying out the business objectives of the Company. These resources include, but are not limited to, office equipment, telephones and other mobile communication devices, e-mail, mail services, vehicles, computers, supplies, inventories, tools, intellectual property, any other assets and software or access to software.

You are required to use these resources in a responsible, legal and ethical manner. Incidental or occasional personal use of these resources is permitted as long as supervisory approval has been secured, such personal use does not interfere with the conduct of JBSS's business and such use does not violate the spirit of this Code and does not violate any JBSS policy. Misapplication, intentional destruction or waste of such resources is prohibited.

In carrying out your duties, the use of personal software or any other personal item is not permitted unless it has been specifically authorized. Furthermore, you may not use software in a manner that is inconsistent with the terms of the software's license or in a manner which negatively impacts or jeopardizes the Company's information security policies and practices. JBSS specifically reserves the right to review, monitor, access, and intercept any electronic communications contained in and/or accessed, sent, or received through the Company's systems including the Company's electronic resources, including but not limited to Company computers, mobile communication devices, e-mail, voicemail, video calls, and internet activity. Accessing or transmitting offensive or crude materials or materials which could negatively impact the Company's information technology security while using the Company's electronic resources is not permitted. This policy applies whether you are working at a JBSS facility or outside a JBSS facility. If you believe that there has been an information security incident, immediately report such incident to the Chief Financial Officer.

Questions or concerns pertaining to use of electronic resources including any suspected violations or questionable conduct, should be directed to the Human Resources Department or reported through the anonymous reporting system.

**SOCIAL MEDIA POLICY:**

Your social media postings reflect on you and on the Company by association. When posting on social media, respect yourself, your audience and any subjects of your postings. Avoid accusations, language and statements that could give rise to defamation, invasion of privacy, harassment, or other related claims. If posting about the Company, make clear that the views expressed are yours and not those of the Company. Do not disclose any Company information that is confidential or proprietary, such as trade secrets, and do not make any posts that violate Company policy including the Company's Harassment and Discrimination policies.

**DRUG AND ALCOHOL FREE WORKPLACE:**

JBSS is committed to maintaining a work environment free from the adverse impact of employee drug and alcohol abuse. While you are on the job or conducting business for or acting on behalf of the Company, including when you are on Company property or operating Company equipment or vehicles, you are prohibited from distributing, using, possessing, selling, manufacturing, buying or being under the influence of: (i) medications or substances that could affect your ability to safely and/or effectively perform your duties; (ii) alcohol; or (iii) any illegal drugs. Procedures have been established to maintain a fair and consistent system for dealing with any employee who is suspected of violating the JBSS Drug & Alcohol Policy. The implementation of these procedures will protect the privacy and rights of Associates while ensuring that all Associates follow the guidelines of the JBSS Drug & Alcohol Policy.

**SAFE WORKING CONDITIONS:**

JBSS is firmly committed to ensuring the health, safety and welfare of its Associates. Each Associate plays a critical role in ensuring the quality and safety of working conditions in each JBSS facility. In this regard, all aspects of our operations shall be conducted in strict compliance with all applicable health and safety laws and regulations, JBSS policies, and best practices pertaining to workplace safety.

All Associates are expected to adopt a proactive and cooperative attitude towards the health and safety of all JBSS Associates, customers, suppliers, vendors and others working at or visiting Company property. All Associates are required to report promptly all on-the-job accidents, injuries, environmental incidents and concerns and concerns about unsafe working conditions to Human Resources or their supervisor.

**DISCRIMINATION:**

JBSS is an equal opportunity employer and recognizes and encourages the uniqueness of individual contribution within its team environment. In all aspects of employment including recruitment, hiring, discipline, compensation and benefits, training, promotion, transfer, and termination, all Associates are expected to treat individuals solely on the basis of their abilities to meet job requirements. Associates should do so without regard to factors such as race, religion, color, ethnic or national origin, age, disability, gender, sexual orientation, marital status, creed, citizenship status, genetic information, gender identity and/or expression, pregnancy, childbirth and related medical conditions, parental status, veteran status or any other factor prohibited by law. The Company will make reasonable job-related accommodations for any qualified employee with a disability and pregnant employees when necessary, unless doing so imposes an undue hardship.

**HARASSMENT:**

JBSS is committed to providing Associates with a workplace that is free from harassment based upon race, religion, color, ethnic or national origin, age, disability, gender, sexual orientation, marital status, creed, citizenship status, genetic information, gender identity and/or expression, pregnancy, childbirth and related medical conditions, parental status, veteran status or any other factor prohibited by law. Apart from being unlawful, harassment is extremely disruptive and contrary to the Company's best interests.

If you observe discrimination, harassment or are the victim of any activities which could constitute harassment, you must report it to the Human Resources Department or to a vice president or higher level officer of the Company (a "Senior Officer"), or pursuant to the anonymous reporting system, so that it can be investigated and appropriate actions can be taken. JBSS has adopted an Employee Dating Policy intended to prevent sexual harassment and other uncomfortable working relationships. The Employee Dating Policy prohibits supervisors, managers and executives from engaging in romantic, sexual or personal relationships beyond a platonic friendship with subordinate employees under such individual's direct management control. Questions or concerns about workplace relationships should be directed to Human Resources.

Please consult JBSS' Nondiscrimination, Anti-Harassment, Sexual Harassment and Anti-Bullying Policies for information about (among other things) the Company's complaint, reporting, and investigation procedures. The Company strictly prohibits retaliation against anyone who in good faith reports or files a complaint about discrimination or harassment, participates in a Company investigation, or engages in other conduct protected under applicable law.

**GIFTS AND IMPROPER PAYMENTS:**

Significant gifts of goods, services or other favors must not be solicited, offered, accepted or made. Nominal gifts and reasonable hospitality (such as lunches or dinners with vendors or suppliers) in the ordinary course of business may be accepted, provided they do not place you under any obligation and will not otherwise create an actual or apparent conflict of interest. Any significant gift or offer of hospitality of significant value or outside of the ordinary course of business must be reported to either the Human Resources Department or the Chief Financial Officer to determine if it may be accepted. You and your family must not offer or accept anything that could damage JBSS's reputation. Gifts of cash, gift cards, or other cash or monetary equivalents in any amount must never be given or accepted unless they are of a nominal value and approved in advance by Human Resources or the Chief Financial Officer. Bribes and kickbacks must never be paid or received.

Particular care should be exercised when dealing with government officials at any level of government. Several laws, including the U.S. Foreign Corrupt Practices Act, specifically prohibit offering or giving anything of value to government officials to influence official action or secure an improper advantage. A violation of these laws is a serious offense and could subject the Company to fines, loss of business and other severe penalties, and could subject you to personal criminal liability as well. If there is any question as to whether something of value provided to a government official could potentially be viewed as influencing that government official, you are required to

consult your supervising manager and the Chief Financial Officer in advance of providing the thing of value. This includes any payment of money (or equivalents) that could be construed as helping to facilitate or otherwise expedite any routine, non-discretionary government actions (referred to as “facilitation payments”). All Associates should record all things of value provided to government officials accurately and transparently, including on expense reports, travel itineraries, and other Company books and records. For further information about dealing with government officials, all JBSS Associates should refer to the Company’s Anticorruption Policy. Any questions or concerns, or suspected violations of the Anticorruption Policy, should be directed to the Chief Financial Officer.

#### **CONFIDENTIALITY:**

Associates may have access to confidential and proprietary information during the course of employment at JBSS. Confidential Information must never be shared with others outside JBSS without approval from a Senior Officer and the execution of a confidentiality agreement, and such information may never be disclosed for personal gain. Confidential Information is information or materials of a secret or proprietary nature that is related to the business of JBSS, which includes but is not limited to the following: trade secrets, formulas, processes, business plans/outlooks, sales/marketing programs, customer lists, pricing, brand formulations, significant legal action or strategy, new products, price changes, acquisitions, mergers, divestiture of brands, non-public financial information, designs, formulas, recipes, process know-how and/or changes in senior management. Confidential Information that you obtain while employed at JBSS regarding vendors, customers, suppliers is to be held strictly in confidence.

This obligation of confidentiality applies to Associates even after they leave JBSS as long as the information remains confidential and is not generally available to the public. The disclosure of Confidential Information can be harmful to JBSS and could be the basis for legal action against the Company and/or the Associate responsible for the disclosure. JBSS also respects the rights of others regarding their confidential information. You must not accept, solicit or divulge confidential information from or about any third party including customers without the prior authorization of a Senior Officer.

Nothing contained in this Code limits an Associate’s ability to file a charge, report, or complaint with the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the Securities and Exchange Commission, law enforcement, or any other federal, state or local governmental agency or commission (“Government Agencies”). Further, nothing in this Code limits an Associate’s ability to: communicate with any Government Agencies or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including providing documents or other information, without notice to the Company; from making truthful statements or disclosures required by law, regulation or legal process; from requesting or receiving confidential legal advice; or from disclosing unlawful acts in the workplace such as sexual harassment; *provided, however*, that an Associate may not disclose Company information that is protected by the attorney-client privilege, except as expressly authorized by law. This Code does not limit an Associate’s right to receive an award for information provided to any Government Agencies. An Associate will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (1) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney) solely for the purpose of reporting or investigating a suspected violation of law; or (2) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal; and an Associate who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

#### **RETENTION OF RECORDS:**

Various laws, regulations and rules require JBSS to retain many records, particularly its financial, tax, personnel, health and safety, environmental, contract and corporate records for various periods of time. Similarly, records relating to a pending litigation, audit or government investigation may not be destroyed until no sooner than when the matter is closed. Furthermore, JBSS has internal document and record retention and destruction policies and procedures.

Destruction of records to avoid disclosure in a legal proceeding or investigation may constitute a criminal offense. You must strictly adhere to JBSS’s document retention and destruction policies and procedures in addition to the

relevant laws pertaining to this matter. If you are unsure as to whether or not a document should be retained or destroyed, consult with the Chief Financial Officer before proceeding.

**RESPONSIBILITY TO CUSTOMERS AND CONSUMERS:**

To maintain JBSS’s valuable reputation, compliance with our quality processes and requirements is essential. We will not damage our good name and ship products or deliver services that fail to meet JBSS’s high standards or any other legal standards pertaining to food products.

We will build long-term relationships with our customers by demonstrating honesty and integrity. All marketing, advertising and labeling will be accurate and truthful. Deliberately misleading messages, omissions of important facts, or false or unsubstantiated claims about competitors’ offerings or products are prohibited. All Associates are required to report promptly all food safety concerns and concerns about mislabeled or dangerous products to their supervisor.

**INSIDER TRADING:**

JBSS has a written policy and procedure to prevent insider trading with regard to JBSS Securities. Simply stated, it is a violation of federal securities laws to, among other things, trade JBSS’s stock while in possession of material non-public information, either directly or indirectly by communication of such information to others so they may trade on it. One form of non-public information that must be handled with particular care is information that, if publicly known, could reasonably be expected either to affect the price of a company’s stock or be material to an investor in making an investment decision. A violation may occur without a monetary gain. Violation of these laws can result in serious criminal penalties and disciplinary action, up to and including termination. Please consult JBSS’s insider trading policy for additional information and other restrictions relating to the treatment of non-public information and trading in JBSS securities.

**RELATED PERSON TRANSACTIONS:**

JBSS may have purchasing relationships or other transactions or arrangements with businesses or persons that are considered related persons under the applicable securities laws or under the Company’s Related Person Transaction Policy. In order to ensure that related person transactions and arrangements are appropriate and approved in a manner consistent with the policies of the Company, JBSS Associates who intend on conducting business with a related person are required to report such proposed transactions and arrangements to the internal audit department of the Company and otherwise comply with the Company’s Related Person Transaction Policy, which can be obtained from the accounting department or the Chief Financial Officer. Such Related Person Transaction Policy contains (among other things) a description of the businesses and individuals that are deemed “related persons” under such Policy, and provides examples and procedures with respect to the types of transactions and arrangements covered by such policy.

**RELATIONSHIPS WITH COMPETITORS:**

JBSS is committed to conducting business in a lawful manner in a free enterprise market system. Consequently, when conducting Permitted Business with Competitors, Associates are prohibited from entering into agreements or arrangements with competitors to: (i) fix sales or purchase prices or other terms; (ii) divide or assign sales or purchasing territories; (iii) divide or assign customers or suppliers; or (iv) coordinate or rig bids or auctions. “Permitted Business with Competitors” shall be defined as: (i) purchasing from or selling to competitors in the ordinary course of the Company’s business; (ii) working with competitors in trade association activities or in activities that promote the interests of the industry in which the Company operates as a whole (e.g., lobbying); or (iii) exchanging credit information pertaining to existing or potential customers.

**COMMUNICATION:**

If you know or have genuine suspicions of any legal violation in work-related issues or breaches of this Code that are not related to an accounting and financial disclosure matter (see Fraud and Theft section), you must report it to the Human Resources Department or to a Senior Officer, or pursuant to the anonymous reporting system, so that it can be investigated and appropriate actions can be taken. Associates are required to cooperate in any investigation conducted by the Company into a report pursuant to this Code.

If a concern is in relation to a legal violation or breach of this Code in which you believe that an employee in the Human Resources Department could be implicated, you should communicate this information to the Chief Financial Officer or pursuant to the anonymous reporting system.

Company policy prohibits the retaliation against any employee who brings a complaint in good faith and where it is reasonable to believe that a violation of this Code has occurred, even if there is an ultimate finding that no such violation has in fact occurred or that there is insufficient conclusive evidence to make such a finding. Company policy also prohibits retaliation against any employee who participates in good faith in an investigation into a complaint raised pursuant to this Code.

#### **FINANCIAL REPORTING:**

Associates are responsible to ensure that JBSS complies with external financial reporting obligations that are defined in Generally Accepted Accounting Principles and relevant federal and state laws, regulations and rules (“Financial Reporting Standards”). These Financial Reporting Standards require, among other things, that JBSS record transactions in a manner that is complete, accurate and timely. When a transaction occurs in which you are involved, you must ensure that it is recorded in our ERP system promptly. For those transactions that cannot be recorded in our ERP system or cannot be recorded in our ERP system in a timely manner, you must communicate the details of the transaction directly to the Finance Department even if amounts must be estimated. It is important for you to recognize that transactions must be recorded when they occur – not when documentation pertaining to the transaction is received or when issues are resolved.

#### **WAIVERS AND PERMISSION:**

Any waiver of a provision of this Code for any JBSS executive officer or member of the Board of Directors of JBSS must be approved in writing by the Board of Directors. Any such waivers granted, along with the reasons for the waivers, will be publicly disclosed by appropriate means. Complying with this Code by obtaining permission where required will not be deemed to be a waiver of any provision of this Code for purposes of this paragraph.

#### **ENFORCEMENT:**

All Associates have the personal responsibility to understand and follow the principles set forth in this Code. Behavior that violates the ethical principles set forth in this Code will be subject to possible disciplinary action including, where appropriate, termination.

#### **CODE NOT A CONTRACT OF EMPLOYMENT:**

This Code is not a contract of employment nor is it meant to limit the Company’s rights to discipline or terminate employees for any acts or omissions, including those not set forth as part of this Code. Neither does this Code change the status of any at-will employee. The Company retains all of its rights in connection with the discipline and/or termination of Associates. This Code is in addition to any employment contract that an Associate may have with the Company.

#### **SUMMARY:**

This Code is designed to be an aid to and set expectations for JBSS Associates to successfully navigate through a competitive business environment in an ethical and legal manner. As we grow as an organization, adhering to a Code will help ensure the future and reputation of JBSS and our Associates. It is critical that all Associates from executives to new hires comply with this Code and consider their actions on a daily basis and perform appropriately. With any ethics issue it is important to remember that, if there is any doubt regarding the course of action you should take, consult with the Human Resources Department or a Senior Officer. It is every Associate’s responsibility to create and maintain a culture and atmosphere of honesty, fair business dealings and high legal and ethical standards at JBSS.

**Amended, Approved and Adopted by the Board of Directors of JBSS on October 27, 2021.**