Dear Big Heart Pet Brands Colleagues,

When you have a pet, you have the life-long love of a trusting friend – one who gives you purpose, responsibility and unbridled joy. People count on Big Heart Pet Brands to help nurture that bond. They put their trust in us, and every day Big Heart Pet Brands must earn that trust by doing what matters for pets and people – turning our values into actions.

If pets are what motivate us, then our values are what we hold ourselves accountable to. That is why we have our Code of Conduct. It’s a tool that’s designed to help us understand and connect with our values. The Code guides our actions to make sure they are always in line with those values, and it applies to every employee at every level of our organization. But don’t think of the Code as a book of rules. It actually offers so much more. It’s a guide that leads us through a variety of situations we might face and gives us the resources we need to make good decisions.

We understand that business can get complicated, and the right choices aren’t always obvious. That’s why we should all refer to the Code often – whenever we face a tough situation or a course of action isn’t clear. While it cannot address every possible situation or question, it can point us in the right direction – toward our True North, where our business is always conducted fairly, relationships are strengthened and our reputation for integrity is preserved.

Thank you for your ongoing commitment to Big Heart Pet Brands. Take our values to heart and remember that you represent the spirit of our Company to the world each day. Get to know the Code and let it lead the way. With your help, we will continue to nurture the bond between pets and the people who love them, making every day special.

David J. West
President and CEO, Director
Message from the CEO

Our True North

1. Our Code is Our Compass
   1.1. What is the Code? ...................................................................................................
   1.2. Using the Code ........................................................................................................
   1.3. Doing What’s Right ...............................................................................................
   1.4. Reporting Concerns ..............................................................................................

2. Respect for People and Our Company
   2.1. Equal Opportunity .................................................................................................
   2.2. Respect for Others .................................................................................................
   2.3. Workplace Safety and Health ............................................................................
   2.4. Workplace Violence ............................................................................................
   2.5. Substance and Alcohol Abuse ..........................................................................
   2.6. Independent Contractors and Consultants .................................................
   2.7. Protecting Employee Privacy ............................................................................

3. Quality and Integrity in the Marketplace
   3.1. Product Integrity ....................................................................................................
   3.2. Communications and Product Labeling ............................................................
   3.3. Environmental Protection ..................................................................................
   3.4. Fair Competition ..................................................................................................
   3.5. Anticorruption ......................................................................................................
   3.6. International Trade .............................................................................................
   3.7. Money Laundering and Terrorist Financing ..................................................
   3.8. Human and Workplace Rights ...........................................................................

4. Records, Reporting and Communication
   4.1. Social Media ...........................................................................................................
   4.2. Customer and Consumer Relations .................................................................
   4.3. Contracts ................................................................................................................
   4.4. Accurate Books and Records ............................................................................
   4.5. Records Retention ..................................................................................................
   4.6. Cooperation with Audits and Government Investigations .........................
   4.7. Responding to Inquiries from Third Parties ...................................................

5. Personal Interests and Relationships
   5.1. Conflicts of Interest ................................................................................................
   5.2. Jobs and Affiliations of Close Friends and Relatives ........................................
   5.3. Supplier Relationships .........................................................................................
   5.4. Personal Financial Interests ................................................................................
   5.5. Insider Trading .....................................................................................................
   5.6. Political Activities and Contributions ................................................................
   5.7. Gifts and Entertainment ........................................................................................
   5.8. Protecting Company Property ...........................................................................

A Word of Thanks
Tools and Resources
2. Respect for People and Our Company

Our name is Big Heart Pet Brands for a reason. We are united by a genuine love of pets and by the goal of nurturing the bond between pets and the people who love them. That’s what motivates us and connects us to each other. When we stand together, we can do great things.