

### **Code of Ethics for Senior Corporate Financial Officers**

# 1.0 Purpose

Lamb Weston Holdings, Inc. and our subsidiaries ("Lamb Weston") comply with all applicable U.S. laws and regulations and similar non-U.S. laws and regulations related to financial reporting and conflicts of interest. Lamb Weston has adopted this Code of Ethics for Senior Corporate Financial Officers ("Code of Ethics") to assure the investing public of our commitment to complete and accurate financial disclosures in compliance with applicable laws and regulations and protect our reputation for integrity.

Employment, election as a director or officer, or engaging as a contractor comes with responsibility and duty. Among other duties, the individual has a duty to Lamb Weston – a fiduciary duty – that requires the individual not to advance personal interests in ways that injure or take advantage of Lamb Weston. Individuals are required to exercise strict standards of honesty and good faith, as well as reasonable care and good business judgment when acting on behalf of Lamb Weston, and to put personal interests aside when making decisions involving Lamb Weston.

### 2.0 Scope

This Code of Ethics is applicable to Lamb Weston's Chief Executive Officer, Chief Financial Officer, and Controller (the "Senior Corporate Officers"). Our Senior Corporate Officers are also subject to the provisions of our Code of Conduct, which is applicable to all of Lamb Weston's employees.

# 3.0 Definitions

Term	Definition	
Senior Corporate Officers	Collectively refers to the Chief Executive Officer, Chief Financial Officer,	
	and Controller of Lamb Weston Holdings, Inc.	

#### 4.0 Senior Corporate Officers' Duties

Our Senior Corporate Officers shall, in the performance of their duties for Lamb Weston, to the best of the officers' knowledge and ability:

- Act with honesty and integrity, and ethically handle any actual or apparent conflicts of interest between personal and professional relationships.
- Disclose to the Audit Committee any material transaction or relationship that could reasonably be expected to give rise to a personal conflict of interest.
- Provide, or cause to be provided, full, fair, accurate, timely and understandable disclosure in reports and documents that Lamb Weston files with, or submits to, the Securities and Exchange Commission and in other public communications made by Lamb Weston.
- Comply with applicable government laws, rules, and regulations.



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- Maintain the confidentiality of information acquired in the course of the performance of his or her duties and not use such confidential information for personal advantage.
- Use, or cause to be used, all corporate assets entrusted to such officer in a responsible manner and in the best interests of Lamb Weston.
- Promote, as appropriate, the provisions of Lamb Weston's Code of Conduct relating to the reporting by employees of improper accounting or financial reporting without fear of retaliation.
- Promptly report any violations of this Code of Ethics to the Audit Committee and promote the prompt reporting of violations of the company's Code of Conduct to the persons identified in that Code.

#### 5.0 Whom to Contact with Questions

You are encouraged to ask questions and seek advice before acting, rather than after. If you have any questions regarding this Policy, please contact Lamb Weston Compliance through your regional compliance email at:

- compliance@lambweston.com
- ComplianceEMEA@lambweston.eu
- complianceLATAM@lambweston.com

#### **6.0 Enforcement**

The Audit Committee shall determine, or designate appropriate persons to determine, remedial actions to be taken in the event of a violation of the Code of Ethics. Such actions shall be reasonably designed to deter wrongdoing and promote accountability for adherence to the Code of Ethics. The Board of Directors has full and discretionary authority to approve any amendment to this Code of Ethics for Senior Corporate Officers; any such amendment shall be promptly disclosed as required by applicable law or regulation.

Consistent with New York Stock Exchange rules, only our Board of Directors or a committee of our Board of Directors may waive a provision of this Code of Ethics for our Senior Corporate Officers, and any waiver will be promptly disclosed to our stockholders.

## 7.0 Reporting Concerns

We count on you to speak up if there is reason to suspect that an employee, officer, a member of the Board of Directors or any third party has violated Lamb Weston policies or local law, or to report any activity that could damage Lamb Weston's reputation. You may use any of the following reporting channels:

- Your supervisor or manager (provided they are not involved in the violation);
- Lamb Weston Human Resources Representative;
- For violations related to bribery, financial recording and reporting, internal accounting controls, an auditing matter or fraud, you may contact the Audit and Finance Committee of the Lamb Weston Board of Directors,

by mail:

Lamb Weston Holdings, Inc.

Attn: Audit and Finance Committee of the Board of Directors

599 S Rivershore Ln, Eagle, ID 83616

or

by email: audit committee@lambweston.com

Lamb Weston Compliance:



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- o <u>compliance@lambweston.com</u>
- o ComplianceEMEA@lambweston.eu
- o <u>complianceLATAM@lambweston.com</u>
- The Lamb Weston Helpline: <u>lambweston.ethicspoint.com</u>
- Additionally, in EMEA, you can raise questions through confidential counsellors.

### 8.0 Non-Retaliation

Lamb Weston will not tolerate retaliation against any individual who, in good faith, discloses any actual or suspected violations or participates in a Lamb Weston investigation. Retaliation will result in disciplinary action which could include ineligibility for future participation in Lamb Weston's equity and other incentive plans, recoupment of equity or other incentive awards, or termination of employment.

# **Key Related Policies and Other Guidelines**

Document No.	Document Title	
	Code of Conduct	
LW.LGL.008	Conflict of Interest Policy	

# **Policy History and Review Schedule**

Policy No.:	LW.LGL.016	Effective Date:	9 November 2016
Policy Owner:	Corporate Secretary	Date Last Modified:	21 February 2024
Date Last Reviewed:	21 February 2024	Next Review Date:	21 February 2026

Date Changes Made:	Description of Changes Made:	Supporting Documents
3 March 2022	Formatted into LW template Purpose, Scope, and Definitions Sections (Sections 1-3) added	code-of-ethics-for-se nior-financial-officers

