



Code of Conduct

Statement of Our Core Values

Company Vision

Trulieve will be the leading customer-focused cannabis brand in the United States, with depth in the markets we choose to operate in.

Mission

Provide the highest level of cannabis products and customer experience through authentic and reciprocal relationships.

Values

Our values are a critical part of who we are as a company. They are a commitment that we make to each other, to our customers, to our business partners, and to the communities where we operate.



ONE TEAM

PASSIONATE

TRUSTED
LEADERS

INNOVATIVE

COMMITTED

One Team

We are diverse, inclusive, collaborative, promote open communication, and always celebrate success.

Passionate

We value our teammates, customers, and communities.

Trusted Leaders

We cultivate and inspire authentic relationships, acting with integrity to deliver innovative and quality products.

Innovative

We drive innovation through imagination, research, and strategic partnerships.

Committed

We deliver what we promise.

Our Code

In business, as in other aspects of our lives, ethical behavior doesn't just happen. It must be nurtured and cultivated. The Code is one of the ways that Trulieve does that. The Code applies to every employee of Trulieve, our subsidiaries, and members of our Board of Directors.

It would not be possible to spell out every possible ethical scenario or legal question we might face. Instead, we rely on each other's good judgment to live by Trulieve values and ask questions when uncertain. This Code is your guide to doing business the Trulieve way.

Responsibility of All Employees

We each play an important role in upholding Trulieve's values and complying with the law. We must commit to the following:

- **Read and understand** this Code and the Trulieve policies that apply to your job.
- **Comply** with applicable law, this Code and Company policies.
- **Support** other employees in doing business in accordance with Trulieve's values.
- **Seek guidance** if you are uncertain as to the right way to proceed or you need help with any of the topics addressed in this Code.
- **Speak up!** Report known or suspected violations of the Code, the law, or Company policies to your manager, the Helpline, or the other resources identified in the Code. No employee will ever be retaliated against for bringing up such concerns in good faith.
- **Cooperate** in Company investigations, audits and other reviews.

Responsibilities of Managers and Leaders

As a Trulieve manager or leader, you have a special obligation to demonstrate Trulieve's values and to support our employees in understanding their compliance obligations and conducting business with integrity. Trulieve managers and leaders must commit to the following:

- **Be a role model.** Set an example of doing business in accordance with Trulieve's values. Never encourage or direct any employee to achieve a business result at the expense of violating our Code or values.

- **Support a culture of compliance and ethics.**
Encourage employees to refer to the Code; ensure that those with whom you work are familiar with the policies that apply to their jobs; support Trulieve's compliance training and communications; and assist in implementing compliance and ethics initiatives in your area.
- **Listen and offer guidance.** Be available to employees who come to you to raise concerns and ask questions. Assist employees in making ethical decisions. Whenever necessary, include other experts (e.g., HR) in addressing ethical concerns.
- **Take action and monitor for retaliation.** If you become aware of or suspect misconduct, refer the matter to the Human Resources, Legal, or another appropriate resource. Monitor to prevent retaliation against employees who report suspected misconduct or cooperate in investigations.
- **Consider compliance.** Consider employees' commitment to compliance and Trulieve values when evaluating and rewarding employees, and help employees understand that business results are never more important than ethical conduct.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Trulieve guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my friend or coworker to do?
- Is this the right thing to do?
- Do I have any remaining concern that I am still uncertain about and should I consult my leader or an expert in Trulieve (e.g., HR)?

Respect for the Individual

We all deserve to be treated with dignity and respect at work. It is the commitment of Trulieve and its management to foster a work environment free of illegal discrimination and from abusive, offensive, or harassing behavior. Any employee who feels harassed or

discriminated against should report the incident to his or her manager or to human resources or via the EthicsPoint platform (see Anti-Harassment and Discrimination Policy in the Employee Handbook). Trulieve welcomes and will not retaliate for such complaints made in good faith and any such complaints can be made anonymously the EthicsPoint platform.

All Trulieve employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives, and backgrounds.
- Avoid slang or idioms that are offensive to members of other cultures or beliefs.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.
- If you are unsure if an action or phrase would be offensive, err on the side of ensuring your fellow employees will be comfortable at work. If appropriate, respectfully seek guidance regarding how best to act and interact where there may be delicate issues to be navigated.

Create a Culture of Open and Honest Communication

At Trulieve everyone should feel comfortable to speak up with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions.

Trulieve investigates all reported instances of questionable or unethical behavior. Where improper behavior is found to have occurred, the company will take appropriate action. Trulieve has zero tolerance for retaliation against employees who raise genuine ethics concerns in good faith.

Where it is appropriate and comfortable for employees to do so, they are encouraged to address such issues first with their direct managers, as many issues can be resolved swiftly at this level. If for any reason it is not possible, practical, or comfortable for the employee to raise the issue with their manager, they may reach out to their manager's manager or their assigned HR business partner. Additionally, employees may contact the HR Hotline or submit a report via the EthicsPoint platform.

Set Tone at the Top

Management has the added responsibility for demonstrating, through its actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Trulieve, ethics dialogue should be a natural part of daily work.

Uphold the Law

Because we operate in an industry that requires that we have licenses and permits to operate, maintaining compliance with statutory requirements governing those licenses is critical to our ability to do business. Local laws and regulations govern how we can grow and manufacture our products, how and to whom we sell our products, how we can market our products, and other aspects of our business. We must ensure that our conduct is consistent with legal requirements and does not threaten our licenses, which are at the heart of our company's values. We do this by complying with Trulieve's procedures and processes that have been designed to ensure we are in compliance with the law.

If we are unsure of whether a contemplated action is permitted by law or Trulieve policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Health and Safety

Trulieve strives to provide safe working conditions for our employees. We strive to observe the safety laws of all localities in whose jurisdiction we operate. No one will knowingly be required to work in any unsafe manner. Safety is every employee's responsibility, and all employees are expected to do everything reasonable and necessary to observe all safety rules and keep Trulieve a safe place to work. Please contact the Environmental, Health and Safety or Human Resources Departments for more information.

Product and Regulatory Compliance

Trulieve is committed to the safety and integrity of our products. We can best safeguard our products by complying with Trulieve procedures and processes designed to ensure the safety and quality of everything we produce. We comply with all product safety and quality requirements.

Promotional Materials and Interactions with Healthcare Professionals

We are committed to the highest standards of integrity in our promotional practices and our interactions with healthcare professionals and the public. All promotional materials and communications must be accurate and compliant with applicable regulatory requirements. We do not bribe, or accept bribes from, government officials, healthcare professionals or customers, and we comply with Company policy and the law in providing promotional material, including but not limited to samples.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Trulieve products based on their merit, superior quality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Trulieve or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Trulieve, its securities, business operations, plans, financial condition, results of operations or any development plan. We are particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Avoid Conflicts of Interest

We avoid relationships or activities that impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may face situations where the business actions we take on behalf of Trulieve may conflict with our own personal or family interests. We have a duty to Trulieve to advance its legitimate interests when the opportunity to do so arises. We do not use Trulieve property or information for personal gain or take personal advantage of an opportunity that is

discovered through our position with Trulieve. Please refer to the Conflict of Interest Policy for more information.

Insider Trading

You must not buy or sell Trulieve securities when you possess material nonpublic information about the Company. This illegal practice is known as “insider trading.” Passing such information on to someone who may buy or sell securities – known as “tipping” – is also illegal. The prohibition applies to Company securities and to securities of other companies if you learn material nonpublic information about other companies (such as Company suppliers) in the course of your duties for Trulieve.

Material information is information that an investor would think important in deciding whether to buy or sell a security. Examples include financial results, new or lost contracts or products, sales results and important personnel changes. Please refer to the Insider Trading Compliance Policy for more information.

Set Metrics and Report Results Accurately

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely, and understandable. This obligation applies to all employees with any responsibility for the preparation for such reports, including drafting, reviewing, and signing or certifying the information contained therein. Public disclosures do not contain misrepresented facts or falsified records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain, and dispose of our company records as part of our normal course of business in compliance with all Trulieve policies and guidelines, as well as all regulatory and legal requirements.

To the best of our ability, corporate records are true, accurate and complete. Company data is promptly and accurately entered in our books in accordance with Trulieve’s and other applicable accounting principles.

We do not improperly influence, manipulate, or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Trulieve books, records, processes or internal controls.

Please refer to the Document Retention Policy for more information.

Promote Substance Over Form

At Trulieve, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Trulieve is committed to doing the right thing. This often means doing more than simply what the law requires. Although Trulieve's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department or submit a report via the EthicsPoint platform.

Here are the behaviors and actions that we won't tolerate, and are not a fit with Trulieve culture:

- Violation of any of the policies and/or procedures described in the Employee Handbook or otherwise communicated to employees.
- Violation of health and safety rules
- Engaging in unethical or illegal conduct
- Unlawful conduct, including theft, fraud, gambling, defacing/destruction of Trulieve or a co-worker's property
- Engaging in any conduct that endangers life, safety, or the health of others.
- Sleeping or loafing while on the clock
- Supplying knowingly false or misleading information when applying for employment or during employment.

If you are aware of any questionable activity that may violate this Code, or any other policy or procedure in place, we encourage you to communicate with management or the HR department, or submit a report via the EthicsPoint platform. Trulieve takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Be Loyal

Confidential and Proprietary Information

Integral to Trulieve's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers, and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses and medical information, business, marketing or strategic plans, product research and development, plant growing and processing methodologies, employee information, nonpublic personal information or protected health information, or nonpublic information about other companies, including current or potential supplier and vendors. We do not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Trulieve are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor mass distribute non-work related materials.

In order to protect the interests of the Trulieve network and our fellow employees, Trulieve reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Trulieve's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

For more information regarding the appropriate use of Trulieve's electronic assets, please refer to the Trulieve Employee Handbook or IT Guides page, as well as your direct supervisor.

Media Inquiries

Trulieve is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that

we speak with one voice and provide accurate information about the company, we direct all media inquiries to the Executive Director of Corporate Communications or Chief Legal Officer. No one may issue a press release without first consulting with the Executive Director of Corporate Communications.

Reporting Concerns

Remember that nobody, at any level within Trulieve, has the authority to require an employee to engage in conduct that violates this Code. If an employee believes that they are being asked or directed to engage in conduct that violates this Code, the employee has an obligation to report that request or directive. If you believe that something is not right at work or that it may violate our Code, our values or the law, report it.

The Human Resources Team

- Hotline: (850) 666-5141
- Email: HR@trulieve.com
- Problem Resolution: HRopendoor@trulieve.com

Confidential Helpdesk

- Hotline: (844) 995-4959
- Online: trulieve.ethicspoint.com
- Mobile: trulievemobile.ethicspoint.com

What Happens When You Report a Concern?

Reports of suspected misconduct will be appropriately investigated and treated confidentially to the extent possible in light of Trulieve's need to conduct an investigation and follow up on any concerns. You are expected to cooperate in internal investigations. Employees are not authorized to conduct their own investigations, even if they are in a management position, without prior consultation with the HR and Legal teams. Investigations often involve complex legal issues and acting on your own may compromise an investigation.

Our Anti-Retaliation Policy

Trulieve relies on employees to let us know if they suspect misconduct. We prohibit retaliation against employees for making a good faith report of suspected misconduct or for cooperating in an investigation. If you are aware of retaliation (against you or another employee), report it right away. Trulieve will investigate and take appropriate action.