

DO THE RIGHT THING



Our business is built on our consumers' trust in our brands, developed over many years. Trust is also important in our relationships with colleagues, customers, suppliers and everyone else we deal with. But trust can easily be damaged. Our Code of Conduct is designed to help us maintain trust in all the things we do at Premier Foods.

From time to time, we all face situations when we need to make a judgement call. At these times it's important we act in accordance with the highest standards. Our Code of Conduct guides you on how you should act in those situations and what's expected of you as a Premier Foods colleague. It also points you to more detailed policies to support you and to people from whom you can seek advice.

Please make sure you're familiar with all areas of our Code of Conduct and keep it handy for when you need that extra bit of help. At Premier Foods we 'respect and encourage one another' at all times, and this underpins who we are as a business and helps us maintain the trust on which our brands, our people and our success depends.

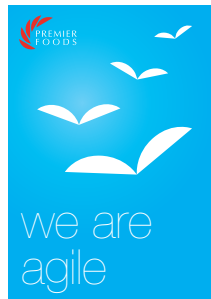
Alex Whitehouse
Chief Executive Officer



We aim higher
we are determined to be the best, consistently delivering at the highest level.



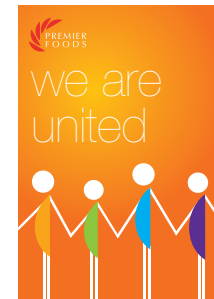
We champion fresh ideas
we are creative in what we do and how we do it.



We are agile
we are energetic and act with pace.

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We are united
we achieve more together.



We respect and encourage one another
we bring out the best in each other.

HOW TO USE THIS GUIDE



This Code of Conduct summarises the policies that you as a Premier Foods colleague, no matter what your job role is, are required to follow.

The booklet directs you to more detailed information so you can be confident about doing the right thing at work, as well as giving you details of who to contact if you have questions or need support. All policies referred to in this Code are available online from our What's cooking? intranet or in hard copy from your local HR contact (see page 17).

No code can provide guidance for every situation you might come across, so if a situation at work makes you feel uncomfortable or if you have doubts about anything, a good starting point would be to ask yourself these questions:

- Is it legal, ethical or honest?
- Is it consistent with our policies?
- Would I feel comfortable explaining it to my family and friends?
- Would I feel comfortable if it appeared in a newspaper?
- Would I feel comfortable explaining it to a court?

You should never hesitate to ask questions, raise concerns or seek guidance on any issues you have. Premier Foods will always support any colleague who has raised a concern in good faith.

Who does this Code apply to?

All our colleagues, temporary staff, agents and contractors should read, understand and follow the rules of our Code of Conduct.

In addition, all managers have a responsibility to:

- Lead by example and display high standards of integrity at all times.
- Create an environment where team members feel confident in raising potential issues.
- Ensure team members who raise issues are taken seriously and supported, and dealt with in an appropriate manner.

SPEAKING UP!

If you have a concern about something which is happening at work, then you should raise your concern with your line manager or HR contact as soon as possible.

Everything possible will be done to respect your confidentiality and you'll be supported and protected from reprisals. You can be confident that reporting an issue in good faith, even if it turns out to be unfounded, will not affect your career prospects.

If a problem is identified, it will be dealt with immediately and diligently. We'll always pursue fraud and wrongdoing as vigorously as possible through disciplinary procedures, or if necessary, through the courts.

If for any reason you feel unable to discuss a concern with your line manager or HR contact, then you can contact any of the colleagues listed below. Or you can call 'Safecall', an external firm who provide an independent and confidential means of reporting colleague concerns who are available 24 hours a day, 7 days a week on the phone by calling 0800 915 1571 or online at www.safecall.co.uk/report.



Further information

- Speaking Up Policy



Available online on
What's cooking?

Who should I talk to?

Your line manager or HR contact,
or if you can't talk to them:



David Wilkinson, Human Resources & Communications
Director

☎ 01727 805 039

Simon Rose, General Counsel & Company Secretary

☎ 01727 805 054

Thomas Abraham, Head of Internal Audit

☎ 01727 815 850

or call **Safecall**

☎ 0800 915 1571

WORKING WITH EACH OTHER

We'll only achieve our goals if we all work together, acting in the best interests of the whole business.

Our Values

To make sure we all understand the standards of behaviour that are expected, we have our Values which are set out in the introduction to this code. Our Values have been created by colleagues from within our business, so they are meaningful to us all.

We expect every colleague, regardless of their role or level, to live up to our Values.

We make sure that we live these Values in many ways:

- › Our annual performance management process places a weighting on how well colleagues live the Values, and our managers are specifically measured on this.
- › Many of our training and development programmes either are or will be specifically designed to help colleagues live our values.
- › There is a 360 degree feedback tool directly linked to the Values, meaning whoever undertakes this will have direct feedback on how they perform against the Values.
- › Our recruitment processes have questions and tests that are designed to help us recruit new colleagues with a set of Values consistent with ours.

When things don't work

If we get it wrong, and on occasions this may happen, we have structures and processes that allow all colleagues to make their views known. We'd always encourage colleagues who are experiencing difficulties to talk to their line manager first, but if this doesn't work then:

- › We have grievance policies that are accessible and clear, in all sites.
- › We have an HR representative who can give advice, help with policies, or act as a mediator, at each site.
- › We operate a confidential helpline, called Safecall, for issues that are not resolvable locally.
- › We have Trade Union representatives at a number of our sites & we work in partnership with them.

Our commitment to you

- › We'll comply with relevant employment legislation.
- › We'll pay you on time and correctly.
- › We'll set minimum ethical standards which must be met at our sites and our supply chain.
- › We'll treat all colleagues in line with our Values, and make decisions about people based solely on merit.
- › We'll never discriminate on the grounds of gender, age, marital status, disability, sexual orientation, gender identity, race, religion, ethnic or national origin.
- › We don't tolerate colleagues being subjected to physical, sexual, racial, psychological or verbal abuse, or any other form of harassment.
- › We'll take steps to make sure our colleagues work only in environments that comply with high standards of safe working.
- › We ensure any personal information we hold about our colleagues is managed properly and securely in line with our legal obligations.
- › We'll provide all colleagues with equal opportunities to build their skills and capabilities, allowing them to develop personally fulfilling and rewarding careers.

What we ask in return

- › That you live the Values in everything you do.
- › That you act with honesty and integrity at all times.
- › That you work to the best of your ability and in the best interest of the business.
- › That you follow all Company policies and processes and legal requirements that relate to your job.

Further information

- › Colleague Welfare and Human Rights Policy



Available online on
What's cooking?

Who should I talk to?

Your line manager or HR contact,
or if you can't talk to them:

David Wilkinson, Human Resources Director
or call **Safecall**



☎ **01727 805 039**
☎ **0800 915 1571**

CREATING A SAFE WORKPLACE

We're committed to protecting the health, safety and well-being of all our colleagues, contractors, visitors and others who come into contact with our business.

We have built a strong safety culture. We constantly review our buildings, equipment and processes so that colleagues are actively involved in managing their own environment and feel confident that any concerns they might have are acted upon.



As a Company we'll always:

- Aim to fully meet our responsibilities by preventing workplace accidents and work-related ill health which may arise from work activities.
- Provide Health & Safety training to develop the skills, competencies and capabilities of our colleagues.
- Engage and consult with colleagues and others regarding all matters relevant to health, safety and well-being.

As a Premier Foods colleague you must always:

- Ensure that Health & Safety considerations are given priority over all other business priorities.
- Look out for yourself and your colleagues.
- Guard against complacency and continue to drive continuous improvement across the business.

Further information

- Health & Safety Policy Statement
- Health & Safety guidance manuals – available from your HS&E contact as detailed opposite



Available online on
What's cooking?

Who should I talk to?

Your line manager or site Health & Safety contact, or if you can't talk to them:



Emma Dale, Group Health & Safety Manager

or email the Health, Safety & Environment Team at hse@premierfoods.co.uk or call **Safecall**

☎ 07900 770 211

☎ 0800 915 1571

FOCUSING ON FOOD SAFETY

As a food company nothing is more important than the safety and quality of the food we produce. All colleagues share a responsibility for safeguarding the integrity of our products.



As a Company we'll always:

- Comply with all relevant food safety legislation and regulations.
- Apply best practice in the management of food safety hazards.
- Define and implement high standards and systems for raw material sourcing, manufacturing, storage, warehousing and distribution.
- Monitor compliance and effectiveness of standards set through our Quality Management System.
- Train, develop, support and recognise our colleagues so they take responsibility for improving quality.
- Ensure the traceability of the raw materials we use and the products we create.
- Ensure effective crisis management processes and procedures are in place.

As a Premier Foods colleague you must always:

- Put food safety at the top of your agenda.
- Know your responsibilities and understand how to fully undertake them.
- Report any concerns you have at the earliest opportunity.

Further information

- Food Safety and Quality Policy



Available online on
What's cooking?

Who should I talk to?

Your line manager or site technical manager, or if you can't talk to them:



Paul Dobson, Quality, Health & Safety & Environmental Director
or call **Safecall**

☎ 01727 815 850
or 01494 809 631

☎ 0800 915 1571

ACTING HONESTLY & COMPLYING WITH THE LAW

We must all uphold the spirit and the letter of the laws and regulations which apply to our Company. However, we can all face challenges from time to time which call for judgement.

We don't tolerate bribery or corruption, including any form of unethical inducement or payment, such as "kick-backs". This means that no one who is working for Premier Foods can:

- Offer, promise or pay anything with the intention of inducing improper conduct.
- Agree to receive anything with the intention of acting improperly.
- Permit a third party to offer, make or receive a bribe.
- Make a 'facilitation payment' to induce public officials (whether in the UK or overseas) to perform routine functions they're otherwise obliged to perform.
- The same rules apply to third parties we work with, such as suppliers, customers, distributors and the like.

Gifts and Hospitality

Gifts and hospitality can be seen as bribes. So any gift or hospitality, either offered or received, must be in accordance with the rules set out in the Company's Anti-Corruption Policy:

- No gift should be offered or received which is lavish, excessive, or might be interpreted to be a bribe or pay-off.
- You should seek specific approval for any individual gifts valued at over £50, or a number of separate gifts from or to the same individual or company which add up to over £200 in value over any 12 month period.
- Ensure that any gifts or hospitality given or received are in accordance with our Anti-Corruption Policy, are properly approved and that a record is kept of it. This includes any low value gifts, as well as more valuable gifts and hospitality.

Charities and Political Donations

Sometimes third parties might try to hide a bribe by channelling money through a charitable organisation or through donations to a political cause or campaign. If you're asked to make a donation to a charity you should refer to our Charitable Giving Policy, which sets out our Policy on charitable giving. We don't make political donations.

Fraud and Theft

We're all expected to take steps to safeguard the resources which come under our responsibility. Fraud can take many forms, which include:

- Taking Company resources (both physical and intangible assets) for personal gain.
- Falsifying Company records.
- Accounting malpractice.
- Deliberately avoiding internal approval processes to commission goods or services for the business.
- Deliberately misrepresenting the Company in any matter to third parties.
- Involvement in any 'Food Fraud' activity.



If you have any suspicions about bribery, fraud or theft taking place, speak to your line manager, or use the Safecall service described under 'Speaking Up'.

Further information

- Anti-Corruption Policy
- Charitable Giving Policy
- Anti-Fraud and Theft Policy



Available online on **What's cooking?**

Who should I talk to?

Your line manager or HR contact, or if you can't talk to them:

Simon Rose, General Counsel & Company Secretary
Thomas Abraham, Head of Internal Audit
or call **Safecall**



☎ **01727 805 054**
☎ **01727 815 850**
☎ **0800 915 1571**

KEEPING COMPANY INFORMATION CONFIDENTIAL



During your career at Premier Foods you'll be trusted with valuable Company information which you must protect, even after you have left us. We need to be able to trust everyone who works for us to ensure that we can share information which helps us to drive our business forward. If you handle Company information carelessly it could easily damage our business and reputation. It could also result in legal action for Premier Foods, and you personally.

Social media

Social media is a part of modern life and at Premier Foods we embrace it. We're comfortable with colleagues using it on company computers or devices or, when safe and appropriate, on their own devices at work.

However, the reality is that anything posted on social media can be shared with the whole world. As Premier Foods colleagues, when we discuss anything at all to do with Premier Foods online we represent our business, whether it's at work or on our own time. So you should always be respectful of our products, colleagues, suppliers and other stakeholders and absolutely never disclose commercial, confidential or other internal information online, even to groups you consider closed or secure.

Our Social Media Guidelines offer some simple guidance while our Social Media Policy outlines the full extent of your online responsibilities as a Premier Foods colleague.

Commercial information

You should never pass on commercially sensitive, confidential or other internal information or documentation about the Company to a third party or use this information for personal gain. The obligation of confidentiality is part of the terms and conditions of your employment and it continues after you finish working here and includes the disclosure of information to others.

You should treat email with the same consideration as other forms of written communication. If you copy and distribute commercial information you must take steps to safeguard confidentiality - only send it on to those who need to know and be mindful that the recipient can forward the email on without your knowledge. You should also remember that an email can bind you and the Company and can also be used in court in the same way as other written statements.

Inside information

Information is 'inside information' if it is not generally available and could affect our share price. This includes details of our financial results, new product developments, major commercial relationships and business acquisitions and disposals. It is a criminal offence to pass on inside information, or use it for personal gain.

If you come into contact with inside information, either due to the nature of your role, or because you're working on a specific project, you'll need to comply with our Share Dealing Code, which explains the specific circumstances when you may purchase, sell or otherwise deal in Premier Foods' shares or other securities.

Confidential information

Premier Foods' trade secrets and other sensitive commercial information must be kept confidential. These include details of our prices with customers and suppliers, new product development, recipes and product specification and other commercial terms.

In the normal course of your work you may have access to confidential information but at times you may also accidentally receive confidential information e.g. from a misdirected email or accidentally taken from a printer. If you do, you should notify the originator immediately and ensure the information is deleted in a confidential way. You should not pass this information onto any other person internally or externally.

Data protection

You may only collect and retain personal data for legitimate commercial purposes, respecting the privacy of colleagues, consumers, customers and suppliers. Senior managers in every area of the business must ensure that their data and information systems comply with relevant data protection laws.



Further information

- > Online Social Media Guidelines & Policy
- > Share Dealing Code
- > IS Users Security and Computing Policy
- > Data Protection Policy



Available online on
What's cooking?

Who should I talk to?

Your line manager or HR contact,
or if you can't talk to them:



Simon Rose, General Counsel &
Company Secretary

☎ 01727 805 054

Simon Wilbraham, Deputy Company
Secretary

☎ 01727 815 850

or call **Safecall**

☎ 0800 915 1571

COMPETING FAIRLY



We welcome and encourage free and open competition in the marketplace, indeed we benefit from it, and all colleagues must comply with competition law everywhere we do business.

We can never allow a legal infringement to jeopardise our business, our reputation or our customer relations. All colleagues who have contact with customers, suppliers and competitors should read our Competition Law Guidelines carefully. They are mandatory and apply to all of our business activities around the world. Any failure to comply with them could have very serious consequences.

If you have questions about this, or if you believe that you are being asked to do something that may be unlawful, you must contact the Legal team immediately. This is not only for the Company's protection - it is also for your own.

Basic Rules

Anti-competitive agreements with competitors, customers or suppliers, as well as the abuse of a market dominant position, are illegal and can result in significant fines against the Company. For example, agreements to fix prices or setting a minimum retail price for our products are illegal.

You must not discuss with a competitor commercially sensitive information such as prices (input, wholesale or retail), profit margins/mark-ups, discounts or rebates or other terms of service. An agreement with a competitor to allocate business is highly illegal. You must not discuss with a competitor any allocation of territory, customer or product types or any commercial or pricing strategies.

You must not discuss the terms or the commercial plans we have with one customer or supplier, or share our knowledge about a customer or a supplier's commercial plans, with another customer/supplier.

We cannot condition our supply to a customer on the basis that the retail price will be at or above a certain level, or incentivise the customer to use a particular retail price, and we can't tell our customers what to do with our products, e.g. whether or not they can sell the products into other EU countries or to particular customers.

Trade associations are not exempt from the competition rules. Because they may involve direct contact between competitors, you must obtain approval from the Legal team before joining one. If you attend a trade association meeting you must make sure that adequate safeguards are put in place to prevent any anti-competitive behaviour.

Some of the Competition Law rules are complex and could be difficult to apply to an ever changing commercial environment. When in doubt you should always seek the advice of the Legal team before taking any action.

Lobbying Activities

Lobbying activities are strategically coordinated by the Corporate Affairs Department. Anyone wishing to engage in lobbying on behalf of Premier Foods or to represent Premier Foods in any way (including as a member of a trade association), must inform and obtain prior written approval from the Corporate Affairs and Legal Departments.



Further information

> [Competition Law Guidelines](#)



Available online on **What's cooking?**

Who should I talk to?

Your line manager or HR contact, or if you can't talk to them:



Simon Rose, General Counsel & Company Secretary
Hannah Collyer, Director of Corporate Affairs

☎ **01727 805 054**
☎ **01727 815 850**

AVOIDING CONFLICTS OF INTEREST

We must all avoid situations where our personal interests could conflict, or appear to conflict, with the interests of Premier Foods.

Conflicts of interest arise where a person's position or responsibilities within the business present an opportunity for personal gain — often at the expense of the Company. They can also arise where personal interests are inconsistent or conflict with the Company in transactions between Premier Foods and a third party.

Examples of potential conflict situations include:

- > Where a close family member is employed by a customer, supplier or competitor.
- > Awarding a contract to a company run by a friend of yours.
- > Undertaking work for another organisation.
- > Using Company assets for personal reasons.
- > Offering a job to someone who is a friend or a relation.



You must not be involved with an activity for personal gain or which is in conflict with Premier Foods' business interests.

You should disclose any potential interests or conflicts to your line manager as soon as they arise or you become aware that they might exist.

If you need guidance as to whether a conflict of interest exists you should seek further advice.

Further information

- > Conflict of Interest Policy



Available online on **What's cooking?**

Who should I talk to?

Your line manager or HR contact, or if you can't talk to them:

Simon Rose, General Counsel & Company Secretary
Simon Wilbraham, Deputy Company Secretary



☎ 01727 805 054

☎ 01727 815 850

WORKING WITH CUSTOMERS AND SUPPLIERS

We're building sustainable partnerships with our customers, suppliers and other stakeholders founded on trust, which benefits both sides.

Maintaining sustainable relationships with customers is a key priority and all dealings with customers must be undertaken with honesty, integrity and openness. We actively collaborate with customers to develop long-term business plans.

We buy and sell our products responsibly so that our consumers and customers can be confident everything they buy is produced in an ethical and sustainable way. We set out clear ethical guidelines for the minimum requirements expected of all our suppliers.

We seek mutually beneficial long-term relationships with suppliers and pay our suppliers, contractors and agents in accordance with agreed terms.



Further information

- > Ethical Trading Policy
- > Policies & Procedures for the Purchase of Goods & Services



Available online on **What's cooking?**

Who should I talk to?

Your line manager, or if you can't talk to them:

Richard Martin, Chief Customer Officer

Mark Hughes, Procurement & Central Operations Director

Thomas Abraham, Head of Internal Audit & Risk



☎ 01727 805 365

☎ 01727 805 272

☎ 01727 815 850

RESPECTING THE ENVIRONMENT

We have an excellent track record in environmental stewardship and we have won awards for the way we source our ingredients and manage our resources and our waste.

One of the key reasons for our success is that we engage with all our colleagues so they understand the challenges and are encouraged to bring forward their ideas. Individual sites are responsible for identifying and developing their own initiatives to achieve these aims. Every opinion, idea and suggestion really does count.

As a Company we'll always:

- Manage our operations and activities to minimise the impact of our business upon the environment.
- Operate within all environmental laws and any other environmental requirements which our Company upholds.
- Ensure that environmental issues are taken into account in obtaining goods and services, and throughout the entire supply chain.
- Encourage all colleagues to carry out their work to the highest environmental standards and minimise the waste of natural resources.
- Set, monitor and report on our environmental objectives, targets and performance.

If you have any concerns about environmental issues you should report them to your environment co-ordinator.

Further information

- Environment Policy Statement
- Environmental guidance manuals – available from your HS&E contact as detailed below



Available online on
What's cooking?

Who should I talk to?

Your line manager or site H&S contact, or if you can't talk to them:

Paul Dobson, Quality, Health & Safety and Environment Director

or email the Health, Safety and Environment Team at hse@premierfoods.co.uk or call **Safecall**



☎ **01494 809 631**

☎ **0800 915 1571**

FOR FURTHER INFORMATION

Copies of this Code of Conduct and relevant policies are available online on our What's cooking? intranet.

If you don't have online access or access to our What's cooking? intranet then copies can be obtained from your local HR contact.

POLICIES AND GUIDANCE

Sections Policies	Policies
Speaking up!	Speaking up Policy
Working with each other	Colleague Welfare and Human Rights Policy
Creating a safe workplace	Health & Safety Policy Statement Health and Safety guidance manuals
Focusing on food safety	Food Safety and Quality Policy
Acting honestly & complying with the law	Anti-Corruption Policy Charitable Giving Policy Anti-Fraud and Theft Policy
Keeping Company information confidential	Share Dealing Code Online Social Media Guidelines & Policy IS Users Security and Computing Policy Data Protection Policy
Competing fairly	Competition Law Guidelines
Avoiding conflicts of interest	Conflict of Interest Policy
Working with customer and suppliers	Ethical Trading Policy Policies & Procedures for the Purchase of Goods & Services
Respecting the environment	Environment Policy Statement Environmental guidance manuals



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This Code was issued by the Company Secretarial team (companysecretary@premierfoods.co.uk) in 2012 and last revised in April 2020.

www.premierfoods.co.uk