

Anti-Bribery and Corruption – our approach

Premier Foods' policy is to conduct its business in an honest and ethical manner, upholding a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in our business dealings and relationships, wherever we operate, implementing and enforcing effective systems to counter bribery and corruption and complying with all relevant laws.

The Group has in place an Anti-Bribery and Corruption Policy and a code of conduct for third parties which provides guidance for complying with anti-corruption laws. This covers, amongst other things, guidance on dealings with third parties, facilitation payments, gifts and hospitality and charitable and political donations. We do not tolerate any form of bribery or corruption and expect all colleagues, business partners, suppliers, contractors, joint venture partners, customers, agents, distributors and other representatives to act in accordance with all laws and applicable Group policies.

We introduced a revised Anti-Bribery and Corruption Policy in 2021 and this also includes a Gifts and Hospitality Register which is reviewed on a regular basis by the Legal team. All gifts and hospitality must be entered onto the register and any gifts or hospitality over £100 must be authorised by a line manager.

We provide annual Anti-Bribery and Corruption training, which is focused on our senior leaders and those assessed as being most exposed to potential risk due to the nature of their roles. This is facilitated through an on-line training course and requires colleagues to confirm that they have read and understood the latest Anti-Bribery and Corruption Policy and also pass a comprehensive test, based on a range of relevant scenario's that may arise in the course of their work.

We have also recently introduced a Dow Jones platform for Sanctions checks, and this also covers checks for bribery, fraud and corruption. We have carried out a review of all existing customers and suppliers and are currently in the process of integrating the Dow Jones checks as part of the onboarding process for any new suppliers and customers. Any checks that are flagged as red or orange are escalated to the Head of Legal and Head of Treasury for further review and action.