



Premier Foods' Anti-Bribery and Corruption Policy

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

The latest version of the Company's Anti-Bribery and Corruption Policy, summarised below, was approved by the Board's Audit Committee on 25 March 2021.

A. Statement of Values

On 1 July 2011 the UK's Bribery Act came into force. This Act aims to encourage a free and fair marketplace by combating bribery and corruption both in the UK and overseas.

Our corporate conduct is based upon our commitment to our values which include to respect and encourage each other. We do not tolerate any form of bribery and corruption, including any form of unethical inducement or payment including facilitation payments and "kick-backs".

Premier Foods expects its employees (staff, contract and temporary) and all our business partners including suppliers, contractors, joint venture partners, customers, agents, distributors and other representatives ("Associated Persons") to act in accordance with all laws and applicable company policies, including any anti-corruption laws, such as the UK's Bribery Act, and any local anti-bribery laws. We provide guidance to all new employees and specific training sessions are arranged on a regular basis for employees working in areas with higher levels of perceived risk.

B. No bribery, corruption or other unethical payments

No Premier Foods' employee (staff, contract and temporary) or Associated Person may:

- i. offer, promise or pay anything with the intention of inducing improper conduct or for the recipient to act improperly as a result of receiving the advantage.
- ii. receive or agree to receive anything with the intention of acting improperly as a result of receiving the advantage.
- iii. permit a third party to offer, make or receive a bribe.
- iv. pay a facilitation payment. "Facilitation payments" are payments to induce public officials to perform routine functions they are otherwise obligated to perform.

Who is an Associated Person?

An Associated Person doesn't have to be a Premier Foods employee; they could also be a customer, contractor, joint venture partner, distributor, agent (someone who provides services on behalf of Premier Foods); or other external third parties such as a supplier (or the supplier's employee) who provides services for us or on our behalf.

The Associated Person doesn't need to be in the UK. They could be based and operating in a different jurisdiction.

The Associated Person must be providing goods or services to Premier Foods or on our behalf.

C. Policy on Gifts and Hospitality

Any gifts or hospitality, either offered or received, must be in accordance with Premier Foods' Policy on Gifts and Hospitality. In summary:

- i. no gift should be offered or received which is lavish, excessive or might be interpreted to be a bribe or pay-off.
- ii. Premier employees must seek specific approval for any individual gifts valued at over £100, or a number of gifts given or received, within a 12 month period, from the same individual or company etc which are valued in aggregate at over £300.
- iii. Every Premier Foods' employee must ensure that any gifts or hospitality, given or received, are in accordance with this Policy and properly approved and managers are required to record receipt in the Company's Gifts and Hospitality Register.

D. Due Diligence on Third Parties

It is essential that Premier Foods knows exactly with whom it is doing business and to consider if there is any anti-corruption risk posed. We carry out due diligence to ensure that business partners have strict anti-corruption policies and procedures in place and utilise a third-party platform to conduct anti-bribery and fit and proper persons checks where we assess that there may be a material risk exposure.

E. Reporting concerns about bribery and corruption

Premier Foods actively encourages its employees to report any suspicions or concerns about bribery and corruption, which will be followed up rigorously, and the Company provides a confidential "speak up" helpline allowing a confidential means of reporting concerns.

F. Enforcement of this Policy

Any incidents of bribery or corruption will be dealt with robustly. If an Associated Person is suspected of bribery or corruption, Premier Foods will investigate the matter and will take appropriate action, which may include reporting any incidents to prosecuting authorities and/or terminating relationships.

G. General

Premier Foods only makes charitable donations in accordance with our Charitable Giving Policy.

Premier Foods does not make donations to political parties or causes.

All third parties, which Premier Foods does business with, must comply with the Company's Anti-Bribery and Corruption Policy.



Simon Rose

General Counsel & Company Secretary

Premier Foods PLC

