



PREMIER FOODS PLC

Our Code of Conduct

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Let's all do the right thing



Alex Whitehouse
CEO

As a business, we have a responsibility to do the right thing and act in a way that is morally and ethically aligned to our Values. Our Code of Conduct is designed to guide us on how we do business and the way we engage with colleagues, customers, suppliers and everyone else we deal with. It lays out the principles by which we should all conduct ourselves in our everyday activities. By ensuring we always seek to do what is right, we will strengthen the trust placed in us by all our stakeholders, something which we have built over many years and can so easily be damaged.

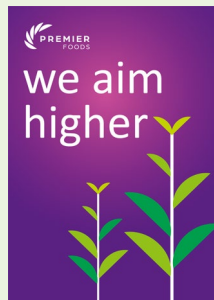
From time to time, we all face situations when we need to make a judgement call. At these times it's important that we act in accordance with the highest standards. Our Code of Conduct is there to help you make decisions on how you should act in those situations and what's expected of you as a Premier 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. This is one of our Values and underpins who we are as a business. Ultimately doing the ethically right thing will drive the long-term success of our brands, our people and the business as a whole.

Thank you,

Alex Whitehouse
Chief Executive Officer

Our Values



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



We are creative in what we do and how we do it.



We are energetic and act with pace.



We achieve more together.



We bring out the best in each other.

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Overview

Premier Foods is one of the UK's largest food producers, employing over 4,000 colleagues at sites across the UK and operating a number of international businesses. Our Code of Conduct helps us all to do business the right way, by creating a safe, respectful and productive environment, and ensuring that we act with integrity and high ethical standards in our working relationships with each other, and with our various stakeholders.

Who does this Code apply to?

The Code of Conduct applies to anyone who works for, or on behalf of, the Premier Foods' group of companies, whether as a temporary or permanent colleague. It also applies to anyone who has a business relationship with us, for example: contractors; agency workers; customers; suppliers and distributors. We should all read, understand and follow the rules of the Code.

How we can live the Code

We believe that every colleague is important to our business. We are committed to building a strong community that fully embraces inclusion, and diversity of skills and experience in the workplace, champions excellence in whatever form and encourages good conduct and professional integrity.

We are all responsible for our conduct at work and for ensuring that we comply with the laws, rules and regulations, which govern our business. Our managers have a further responsibility to:

- Ensure that colleagues understand the Code.
- Lead by example and display high standards of integrity at all times.
- Create an environment where colleagues feel confident in raising potential issues.
- Ensure colleagues who raise issues are taken seriously and are supported.



The Code provides guidance which everyone is required to follow. It directs you to more detailed information, so you can be confident about doing the right thing at work. It also gives you details of whom to contact, if you have questions or need support. If you're unsure about anything, please seek further guidance, as no code can cover every situation you might come across. 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 consistent with our policies?
- Would I feel comfortable if my friends & family knew?
- Would I feel comfortable explaining it to a court?
- Is it legal, ethical, and honest?
- Would I feel comfortable if it were made public?

If not, then speak to your line manager or HR contact, or if you can't talk to them, contact the relevant Speaking Up representative listed for each section of this document.

Further information

Colleagues can obtain copies of our policies and guidance from their local HR contact, or online via My What's Cooking? under Main Menu > Our Resources > Policies.

For our external partners, these can be found on the corporate website www.premierfoods.co.uk under Sustainability > Our positions & policies.



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A Law Debenture company

Safecall is available 24/7, 365 days a year, by calling 0800 915 1571, or online at www.safecall.co.uk/clients/premier-foods

Matters to raise via Safecall may include:

- ✓ The commission of a criminal offence or any other unlawful act, (such as fraud, theft, bribery & corruption).
- ✓ Dangerous practices or negligence at work, which put people or assets at risk.
- ✓ Actions or negligence that could impact adversely on food or product safety.
- ✓ A failure to comply with any legal obligation.
- ✓ Accounting malpractice or falsifying documents.
- ✓ Human rights and modern slavery concerns.
- ✓ Risks or actual damage to the environment.
- ✓ Concealment of any of the above.

Safecall should not be used for the following:

- ✗ For any grievances you may have in relation to your terms of employment (unless you have already raised this with your line manager, supervisor or HR representative and exhausted the internal grievance processes).
- ✗ To settle personal or legal disputes.
- ✗ To make accusations which you know are false. Doing so may lead to disciplinary measures.

What happens once I make a report?

Once a report is raised via Safecall, and subject to enough details being provided, preliminary inquiries will be made to determine whether further investigation is required. If so, a decision will be made as to whether the investigation should be conducted internally or referred externally. Where possible, you will be advised of the outcome of any investigations.

OUR CODE OF CONDUCT

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. Speaking up also applies to anyone who has a business relationship with the Company, for example: our suppliers; contractors; agency workers; customers and distributors.

Your report will be treated in complete confidence and any form of threat or retaliation against a colleague who raises a concern will not be tolerated and could lead to disciplinary action. You can be confident that reporting an issue in good faith, even if it turns out to be unfounded, will not negatively affect you in any way. If a problem is identified, it will be dealt with as soon as possible and diligently, as outlined in our Speaking Up Policy. 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 Speaking Up Representatives listed below. These individuals are there for you to discuss your concerns with, in confidence, and advise on any next steps. Alternatively, you can call Safecall, an external organisation who provide an independent and confidential means of reporting colleague concerns.

Further information ⓘ

Available online on My What's Cooking?
Speaking Up Policy

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

David Wilkinson, Human Resources Director

Simon Rose, General Counsel & Company Secretary

James Hogg, Director of Internal Audit & Risk

or call Safecall: 0800 915 1571

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Creating a safe workplace

Colleague safety is our first priority. As an employer, we have a duty of care to provide a safe workplace for all our colleagues, visitors and other people who might be affected by our business. So, what does this mean for Premier Foods? Simply put, it's creating an environment where everyone feels safe and secure and is supported both physically and emotionally.

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. We provide Health & Safety training to develop the skills, competencies, and capabilities of our colleagues. We also engage and consult with colleagues and others regarding all matters relevant to health, safety and wellbeing.

At Premier Foods, we give equal importance to mental and physical health, and will do all that we reasonably can to support the mental wellbeing of colleagues. We strive to create a supportive environment through a variety of ways, including providing training on mental wellbeing, offering mental health assessments and clinics at work, and making reasonable adjustments for colleagues with physical and non-physical disabilities.



As Premier Foods colleagues, we also have a duty of care for our own health, safety and wellbeing, and that of others within the workplace, because they can be impacted by our actions. Some of the things that we should all do are:

- Ensure that health and safety considerations are given priority over all other business priorities.
- Attend health and safety training.
- Diligently follow the health and safety procedures, instructions and training we are given.
- Immediately report any hazards we come across or concerns we have about safety.
- Support colleagues going through challenges whenever we can.
- Generally, look out for ourselves and our colleagues.

Further information

Available online on My What's Cooking? and from your health and safety contact
 Health & Safety Policy Statement
 Health & Safety guidance manuals

Who should I talk to?
 Your line manager or site Health & Safety manager, or if you can't talk to them:

Emma Dale, Group Health and Safety Manager

or email the Health, Safety and Environment Team
hse@premierfoods.co.uk

or call Safecall 0800 915 1571

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Focusing on food standards and safety

There are strict legal requirements in place for producing food – from the ingredients we source and prepare (food quality and hygiene), to labelling and advertising (presentation).

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.
- Set and apply high standards and systems for sourcing raw materials, manufacturing, storing, warehousing, and distributing our food products.
- 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 that 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.
- Follow the rules and guidelines diligently to ensure that our food is prepared, handled, and stored properly.
- Know your responsibilities and understand how to fully undertake them.
- Report any concerns you have at the earliest opportunity.

Through our leading business practices and policies, and working in collaboration with ingredient suppliers and any third parties involved in the production of our products, we will continue to strive to minimise food waste and produce food that is healthier for people and kinder to our environment.



Further information

Available online on My What's Cooking?
Food Safety, Culture and Quality Policy

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

Paul Dobson, Director of Quality, H&S and Environment

or call Safecall 0800 915 1571

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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 and Behaviours

To make sure we all understand the standards of behaviour that are expected, we have a set of company 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 fully live our Values.

We also have a set of Leadership Behaviours that set out a clear way in which we do things, who we are, and the way we interact with colleagues, customers and stakeholders.

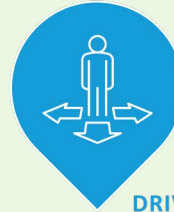
We make sure that we live these Values and Behaviours in many ways:

- Our annual review process places emphasis on how well colleagues live both our Values and Behaviours, and all our colleagues are measured on this.
- Many of our learning and development programmes either are, or will be, specifically designed to help colleagues live our Values and Behaviours.
- There is a 360-degree feedback tool directly linked to the Behaviours, meaning whoever undertakes this will have direct feedback on how they perform against the Behaviours.
- Our recruitment processes have questions and tests that are designed to help us recruit new colleagues with a set of Values aligned with our Behaviours.

Leadership Behaviours



THINK BIG



DRIVE CHANGE



ACT TOGETHER



STAY CURIOUS



SPARK BRILLIANCE



INSPIRE OWNERSHIP

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Our approach to inclusion and diversity

At Premier Foods we believe in inclusion, authenticity and individuality. We aim to ensure that all existing and potential colleagues are given equitable opportunities and are respected, valued and encouraged to bring their true authentic selves to work, no matter who they are, what they look like, who they love or what they believe in. Our culture is one where everyone is welcome.

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 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 our sites and 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 in 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 any grounds, including on 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, which 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.

Premier Foods is committed to ensuring safety throughout the business. Therefore, we must never work while under the influence of substances, (alcohol, drugs, etc.), as this can impair the safe and efficient running of the business, or put the safety of colleagues, customers and the public at risk. We must also never use, possess or distribute illegal or unauthorised substances, while working for the business, whether on or away from any of our sites. Colleagues who experience difficulties with substances, are actively encouraged to seek help.

Further information ⓘ

Available online on My What's Cooking?
Human Rights Policy
Substance Misuse Policy and Procedure

Who should I talk to?
Your line manager or site HR manager, or if you can't talk to them:

David Wilkinson, Human Resources Director

or call Safecall 0800 915 1571

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Working with customers and suppliers

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

Our customers

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.

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 Policy carefully. This is mandatory and applies to all our business activities around the world. Any failure to comply with the policy 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, but also 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, 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's 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.



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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 everchanging 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.

Our suppliers

We seek mutually beneficial relationships with suppliers and pay our suppliers, contractors, and agents in accordance with agreed terms. The engagement of suppliers and customers is always subject to prior sanctions and export controls checks.

As a major employer, we are aware of, and take seriously, our responsibility to both our colleagues and those employed within our supply chain. Our Ethical Trading Policy incorporates the standards set out in the Ethical Trading Initiative Base Code. In addition to issuing our suppliers annually with a copy of our Standard Terms and Conditions for the Purchase of Goods and Services, we also periodically, circulate other key documents, including our Responsible Sourcing Handbook.

We are a founding member of the Supplier Ethical Data Exchange (“SEDEX”). All of our manufacturing sites are SEDEX registered and have completed a self-assessment questionnaire and have regular ethical audits. Our suppliers must make sure they meet our standards in

relation to human rights and we carry out audits on high-risk suppliers and work with them to continually improve standards towards ensuring the human rights of workers in our supply chain are protected. Our approach to human rights is set out in our Human Rights Policy, which requires us to comply with all applicable local laws and regulations. In addition, we are committed to tackling all forms of human rights breaches.

Modern slavery is a global issue, covering a range of exploitation, and includes areas such as human trafficking, sexual exploitation, forced labour, debt bondage, domestic servitude, criminal activities, and child labour. At Premier Foods, we have a zero-tolerance approach to modern slavery and make a statement each year, which can be found on our website, setting out what we are doing to prevent modern slavery in our manufacturing operations and supply chain.

In order to support us in conducting business responsibly, the Group employs a Sanctions and Export Controls Policy. This ensures that we don’t do business with anyone who is sanctioned in the geographies in which we operate, or export products to countries which we shouldn’t.

Further information i

Available online on My What’s Cooking?
 Competition Law Policy
 Ethical Trading Policy
 Modern Slavery Statement
 Human Rights Policy
 Policies & Procedures for the Purchase of Goods & Services
 Responsible Sourcing Handbook
 Sanctions and Export Controls Policy

Who should I talk to?
 Your line manager or site HR manager, or if you can’t talk to them:

Simon Rose, General Counsel & Company Secretary

Richard Martin, Chief Customer Officer

Gareth Pullan, Director of Procurement

or call Safecall 0800 915 1571

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Acting honestly and 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 are otherwise obliged to perform.
- The same rules apply to third parties we work with, such as suppliers, customers and distributors.

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 and/or the misuse, or destruction of any of these.
- Falsifying Company records.
- Accounting malpractice.
- Deliberately avoiding internal approval processes to commission goods or services for the business.
- Committing fraud with the intent to benefit oneself or the business.
- Committing fraud by failing to disclose information, which should be disclosed.
- Deliberately misrepresenting the Company in any matter to third parties.
- Removing, disposing or destroying any Company resources (both physical and intangible assets), without approval.
- 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'.



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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-Bribery and 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 written approval for any individual gifts or hospitality valued at over £150, or a number of separate gifts or hospitality from or to the same individual or company, which add up to over £400 in value over any 12-month period.
- Ensure that any gifts or hospitality given or received are in accordance with our Anti-Bribery and Corruption Policy, are properly approved and that you have recorded it in the Gifts and Hospitality Register. This includes any low value gifts, as well as any over the above thresholds.

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's, 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.

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 are asked to make a donation to a charity you should refer to our Corporate Giving and Community Policy, which sets out our policy on charitable giving. We don't make political donations.

Further information

Available online on My What's Cooking?

- Anti-Bribery and Corruption Policy
- Anti-Fraud and Theft Policy
- Corporate Giving and Community Policy
- Conflict of Interest Policy

Who should I talk to?

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

Simon Rose, General Counsel & Company Secretary

Samantha Sawyer, Head of Legal

James Hogg, Director of Internal Audit & Risk

or call Safecall 0800 915 1571



Safeguarding company information

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 for you personally.

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.

Approaches by the media

As a FTSE 250 listed business, and a major UK food manufacturer and employer with well-known brands, the media is often interested in aspects of our business. What we say and how we're perceived by the media influences the reputation of our Company, brands and people. So, it's important that we deal with any queries from journalists in a professional and coordinated way.

All requests to speak to the media or to film at our sites must be overseen by our in-house Corporate Affairs team before anything is agreed. If you're contacted by a journalist by phone, email, via social media or in person, avoid getting drawn into conversation or exchanging any information. Instead, please tell them all enquiries need to go to the relevant PR agency and direct them to the details on the Contact Us section of the website.

Social media

Social media is a part of modern life and we're comfortable with colleagues using it. This may include, when appropriate, on Company computers or on personal devices while at work.

However, the reality is that anything posted on social media can be shared with the whole world. As a Premier Foods' colleague, 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. Please refer to our Social Media Guidelines.



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Cyber security

At Premier Foods, we continue to take steps to ensure that we do everything we can to protect our systems and colleagues from becoming victims of potential cyber-attacks, including monitoring the cybersecurity landscape, upgrading our systems and providing appropriate training to colleagues.

Unfortunately, the business alone cannot ensure our protection from the threat of cyber-crime. As colleagues, we are the first point of defence the business has against a cyber-attack and there are things that each one of us can do in our daily working life, to minimise this threat, such as:

- Participating in training when instructed.
- Enabling MFA, (Multi-Factor Authentication) when prompted by our IT team.
- Reporting “phishing” using the ‘Phish Alert’ button.
- Being cautious of what you download, avoiding the use of unknown or third-party applications and only using apps from official app stores.
- Not permitting external contractors to connect their devices directly into factory or office equipment without first consulting IT.

If you notice any behaviour on your devices that seems unusual, log a ticket so that it can be checked.

To contact the IT Service Centre please call 0333 332 3600 or visit the IT Service Centre Portal - a link for this can be found on the My What’s Cooking? intranet homepage.

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 emails 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.

Data protection

You may only collect and retain personal data for legitimate commercial purposes, respecting the privacy of colleagues, consumers, customers, and suppliers.

In addition to our individual responsibility to ensure that we process data in accordance with the principles set out in our Data Protection Policy, senior managers in every area of the business must ensure that their data and information systems comply with relevant data protection laws.

Let's all do the right thing

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Copyright infringement

Using copyrighted material, without the permission of the copyright owner, is copyright infringement, which is unlawful and can carry civil and criminal penalties. It is very easy to infringe other people’s copyright without realising it, e.g. if you use press cuttings, icons, graphics or images, which you find on the internet, in documents we produce at work and then share with others. We should also be mindful that any AI generated material may breach copyright.

The Premier Foods brand guidelines contain a section on the use of photography, graphics and icons – it is important that you refer to this. If you are putting any icons, graphics or photography in your work, whether for internal or external use, you should make sure that you have all the necessary permissions from the designer, photographer, people depicted in photographs and any third-party brands featured.

Do not use “free” images, from internet sources, e.g. Google images, since you run the risk of breaching copyright and exposing Premier Foods to a large financial claim. You can find examples of where you can source alternative licence free photography in our brand guidelines which are available on My What’s Cooking?.

Further information

Available online on My What’s Cooking?

- Social Media Policy
- IT Acceptable Use Policy
- Share Dealing Code
- Data Protection Policy

Who should I talk to?

Your line manager or site HR manager, or if you can’t talk to them:

Simon Rose, General Counsel & Company Secretary

Samantha Sawyer, Head of Legal

or call Safecall 0800 915 1571



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Protecting the environment and our communities

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

Available online on My What's Cooking?

Environmental Policy Statement
Environmental manuals – also available from your Health, Safety and Environment contacts as detailed below

Who should I talk to?

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

Paul Dobson, Director of Quality, H&S and Environment

Health, Safety and Environment Team,
hse@premierfoods.co.uk

Nick Brown, Director of ESG

or call Safecall 0800 915 1571

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Our policies and guidance

Copies of this Code of Conduct and the relevant policies and guidance are available on My What's Cooking?

Area	Policies and guidance
Speaking up	Speaking Up Policy
Creating a safe workplace	Health and Safety Policy Statement Health and Safety Guidance manuals
Focusing on food standards and safety	Food Safety, Culture, and Quality Policy
Working with each other	Human Rights Policy Substance Misuse Policy and Procedure
Working with customers and suppliers	Competition Law Policy Ethical Trading Policy Modern Slavery Statement Human Rights Policy Policies and Procedures for the Purchase of Goods and Services Responsible Sourcing Handbook Sanctions and Export Controls Policy
Acting honestly and complying with the law	Anti-Bribery and Corruption Policy Anti-Fraud and Theft Policy Corporate Giving and Community Policy Conflict of Interest Policy
Safeguarding Company information	Social Media Policy and Guidelines IT Acceptable Use Policy Share Dealing Code Data Protection Policy
Protecting the environment and our communities	Environmental Policy Statement Environmental manuals

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This Code of Conduct was first issued in 2012 and this version was approved by the Premier Foods plc Board on 26 September 2024. For further information please contact the Company Secretarial Team (companysecretary@premierfoods.co.uk).