

ABC Code of Conduct

The core values by which all companies of the Associated British Foods Group (incl. George Weston Foods Ltd) operate are:-

Taking care of our people, being good neighbours, fostering ethical business relationships and managing our environment.

As an international business with suppliers, distributors and representatives all over the world, we accept that we have a duty to trade responsibly.

We therefore want to ensure that those people with whom we deal and in particular our suppliers, distributors and our representatives live up to our values and standards and share that responsibility.

Accordingly, suppliers, distributors and our representatives should comply with and seek to develop relationships with their own supply chains consistent with the ABC principles set out below and should be compliant with all local laws and high ethical standards as a minimum.

- **No bribery or corruption will be tolerated**

The offering, paying, soliciting or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited.

A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

Some examples of bribes are as follows. This is not an exhaustive list:

- lavish gifts, meals, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of on-going business negotiations;
- the uncompensated use of company services, facilities or property;
- cash payments;
- loans, loan guarantees or other credit;
- the provision of a benefit, such as an educational scholarship or healthcare, to a member of the family of a potential customer/public or government official;
- providing a sub-contract to a person connected to someone involved in awarding the main contract; and
- engaging a local company owned by a member of the family of a potential customer/public or government official.

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.

Suppliers, distributors and representatives and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply, or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, distributors and representatives and their employees must adhere to the UK Bribery Act 2010.

Suppliers, distributors and representatives shall have in place anti-corruption and bribery procedures or other safeguards, designed to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers, distributors and representatives will properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.