



## Anti-Bribery & Corruption Policy Statement

As outlined in Greencore Group plc's ("Greencore") Code of Ethics & Business Conduct, Greencore, together with its subsidiaries (collectively the "Group") is committed to conducting business to the highest standards of honesty and integrity and complying with all applicable anti-bribery and corruption laws in the countries in which it conducts business. Colleagues, together with individuals and organisations that perform services for or on behalf of Greencore ("Greencore Representative(s)") are required to comply at all times with anti-bribery and corruption laws together with Greencore's Anti-Bribery & Corruption Policy and all applicable Greencore policies, including the Gifts & Hospitality Policy.

*Bribery:* a bribe means the giving, offering or promising of anything of value to another party in order to improperly influence that other party to award business or some other commercial advantage and can include, for example, money, reciprocal favours, gifts, hospitality, entertainment, political or charitable donations, facilitation payments (i.e. typically small unofficial payments made to secure or expedite a routine government action by a government official), or other inducements.

*Corruption:* is any dishonest conduct. It can include bribery but also covers fraudulent activity or acting in a way that puts an individual's interests in conflict with those of Greencore.

Greencore accepts that, in certain circumstances, the giving and receiving of gifts and/or hospitality can be an important part of doing business. However, Greencore has procedures for accepting or providing gifts, hospitality or entertainment to mitigate against the risk or actual or perceived wrongdoing.

Moreover, Greencore Representatives must be cognisant of any conflict of interest whereby a personal interest of the individual conflicts with the interests of Greencore as this too can lead to actual or perceived dishonest conduct. A conflict of interest could be financial, professional, family or other interest and Greencore Representatives must declare any such conflicts (or perceived conflicts) with their key contact at Greencore or, if you are a Greencore colleague with you line manager, who will ensure it is recorded in line with Greencore procedures.

As part of Greencore's annual Legal & Compliance Training Programme, relevant colleagues are required to complete Anti-Bribery & Corruption and Conflicts of Interest training modules and attendance at this training is tracked to ensure completion.

Any actual or suspected instances of bribery or corruption must be reported to the Group Company Secretariat & Legal Department or can be reported via the independently-run confidential hotline, details of which can be found on the Group's website at [www.greencore.com](http://www.greencore.com). All reported incidences of actual or suspected bribery or corruption will be promptly and thoroughly investigated and dealt with appropriately.

Greencore does not, and will not, tolerate any Greencore Representative being involved in any level of bribery or corruption and any individual who is found to be in breach of relevant law or Greencore's Policies will be subject to appropriate disciplinary action.

**Jolene Gacquin**  
**Group Company Secretary**

**Review Date: 12 April 2021**