



# Code of Business Conduct



Making every day taste *better*

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# Introduction from our CEO

Our Code of Business Conduct is at the heart of how we work together and do business. It helps us make the right choices, protect our people, and maintain our reputation. It's important we understand and follow what is expected of us, so we all work in a positive, ethical, and responsible workplace. Whether you're new to Greencore or have been here a while, please take time to read and understand it.

It applies to all of us - directors, colleagues, and anyone working on behalf of Greencore. We also expect our business partners, suppliers, customers, and contractors to work to the same high standards. It's important to note that if you don't follow the Code, it could lead to disciplinary action.

This is more than a set of rules - it's a guide to help us make decisions that reflect what

we stand for as a business. If you're ever unsure about what to do, don't hesitate to ask questions. Speak with your manager, HR team, or a senior leader for guidance.

By working together and following these principles, we can continue to be a strong and trusted business.

Dalton Philips  
**Chief Executive Officer**



## Key principles of the code:



### Do the right thing

Using good judgment and available information to take the right action.



### People at the Core

Respecting everyone we work with, valuing their diversity and opinions.



### Honesty & integrity

Maintaining the highest standards in decisions and interactions.



### Responsible business practices

Showing respect for our people, planet and local communities.



### Confidentiality

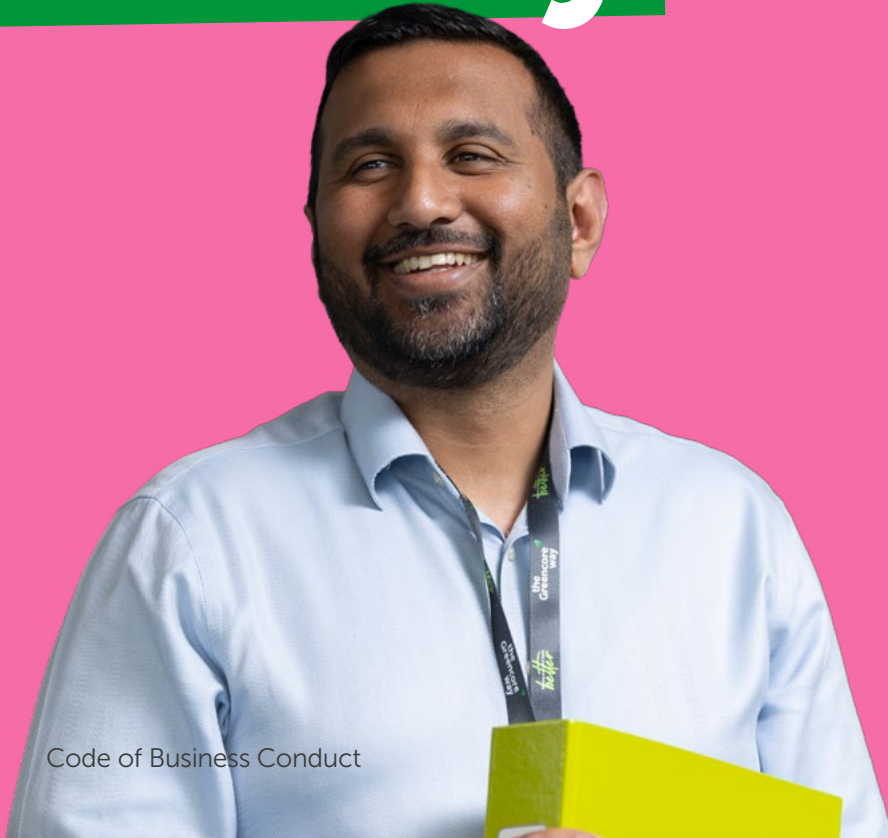
Protecting company, colleague, and partner information, using it responsibly and only for its intended purpose.



### Legal compliance

Following all laws and regulations.

# Our recipe for success: leading the way



## We expect all colleagues to:

- Understand and follow the code at all times
- Ask for help if anything is unclear
- Focus on *how* you work and *what* you do
- Take responsibility for your actions and decisions, and support others in doing the right thing
- Speak up if you see or suspect anything that goes against it. ([see page 5](#) for more information on Speak Up!)



## If you're a leader, we also expect you to:

- Lead the way by following the code and role modelling the right behaviours
- Make sure your team has the skills, tools, and training to comply
- Do what you say you'll do – deliver on your promises
- Promote a culture of openness and ethical behaviours
- Be mindful of risks, never taking, or asking others to take them unnecessarily
- Take action if you see or hear about unethical behaviour – never ignore it.

Leaders will be required to confirm compliance with the code annually to maintain accountability, integrity and commitment, while identifying any issues or concerns.



# Speak Up!



If you see something that goes against this Code or the law, or if something doesn't feel right, you must **'Speak Up!'**.

You can raise concerns with your manager, another trusted colleague, or by contacting our independent Speak Up contact (see Key Contacts on [page 18](#)).

If you're not comfortable using those options, you can report your concerns through our **Speak Up!** phone line or website. This service is run independently by Navex Global, so you can raise issues confidentially and anonymously.

Use **Speak Up!** to report any issue including food safety, health and

safety, criminal activity, bullying, harassment, theft, bribery, corruption, or anything else that worries you.

An independent team will review every report, and if you choose to stay anonymous, your identity will not be tracked or recorded.

All concerns will be thoroughly investigated. We'll never tolerate retaliation against anyone who speaks up.

**Speak Up! is free, confidential and available 24/7:**



**UK: 0800 015 9729**

**Ireland: 1800 901 786**

**Online:**  
**[greencore.ethicspoint.com](https://greencore.ethicspoint.com)**



**The Greencore Way** sets out who we are and how we win. It's what makes us better today and helps us grow as we look to the future. This Code of Business Conduct is a key foundation for The Greencore Way: only through honesty, integrity, and ethical conduct, can we successfully deliver our purpose of Making Every Day Taste Better.



# People at the Core



## Our commitment to safety, health, and wellbeing

The safety and wellbeing of everyone at our sites, including colleagues, suppliers, customers and visitors is our top priority. We're committed to maintaining a safe and responsible working environment, where every individual is expected to act with care, follow site safety rules and contribute to a strong safety culture.

We create an environment where safety is second nature. Our health and safety procedures are clear, regularly reviewed, and continuously improved. Active engagement in safety, through following procedures, reporting concerns, and providing feedback is essential to maintaining and improving our safety standards.

We all play a role in maintaining a safe workplace, so if you see potential risks or unsafe conditions, these should be

reported immediately. This helps prevent incidents and protects everyone on site.

A commitment to continuous improvement drives our approach to safety and wellbeing. We encourage our people to be alert, learn from experiences, and to get involved in making the workplace safer for all.

Ignoring our safety rules puts everyone at risk and will be taken seriously. We all must uphold these standards and contribute to a culture where safety always comes first.

## Our colleagues and our communities

We're committed to empowering an ambitious, diverse and responsible team by nurturing a can-do, safe and inclusive culture. We know that to achieve our business goals it's important our colleagues feel engaged, heard and included. We use colleague forums and listening groups to drive engagement and build understanding, awareness, and connectivity. We're dedicated to providing our people with valued benefits, opportunities



to learn and develop, a positive work life balance, and a working environment where any conflicts are addressed promptly and fairly.

### Respecting each other

We value the unique contributions people bring to our business. We're committed to an environment where everyone is treated with respect, free from discrimination, bullying, harassment, intimidation, or abuse.

### Inclusion & Diversity

We believe that inclusion and diversity enable better business outcomes and make us a great place to work. Inclusion means that we're proud of individual differences.

We value everyone and support, celebrate, and engage with all our colleagues. We should all feel like we belong at Greencore, and that it belongs to us too. We use a broad definition of diversity to include difference, be that age, disability, gender (including gender reassignment), marital or civil partnership status, parental status, race, religious beliefs, sexual orientation as well as educational, social background and experience. We expect everyone to contribute to a culture where diversity is embraced and inclusion is a priority.

Our diversity is also about social inclusion and making sure everyone is welcome, no matter their background. We're committed to a non-discriminatory workplace and operate a zero-tolerance approach to any form of discrimination and we all have a part to play in this. We rely on you to share these values and challenge unfair behaviours, working together to create an environment where everyone can thrive.

### Human Rights

We're committed to respecting human rights in everything we do. We follow international standards, including the UN Universal Declaration of Human Rights, the International Labour Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights ('UNGPs'), and other relevant laws and regulations. We believe that respecting human rights is key to who we are and expect everyone connected to our business to support these values.

We believe everyone involved in making our products, from sourcing raw materials to production on the line deserves to be treated fairly,

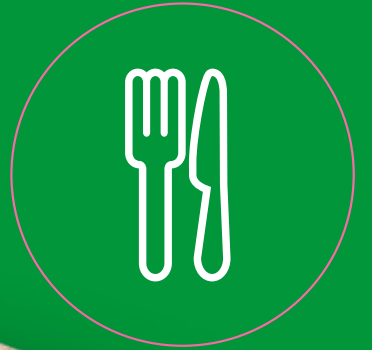
and with respect, in a safe and hygienic workplace. This is a shared responsibility and we expect everyone to help us maintain a respectful work environment, where people feel valued and safe.

We expect our suppliers to follow these same high standards and respect human rights throughout their supply chains, meet with all relevant laws and regulations and adhere to our Supplier Code of Conduct. We also encourage them to keep improving their approach.





# Great Food



## Food safety and quality

To lead the way in convenience food, we're committed to making safe, high-quality food. We follow strict industry standards to source ingredients, handle food, manage allergens, keep things clean and label our products. We work closely with customers and regulators, respond to audits and inspections transparently, look to continuously improve and address any issues (non-conformances) quickly. If there's ever a doubt, we'll stop production until we can confirm the safety and quality of our food.

Creating outstanding, quality food that people love is fundamental to our business, so if you see an issue, it's important you speak to a manager immediately to stop production.





# Lasting Partnerships



## Fair competition

We're committed to doing the right thing. That means following the law, being honest, and acting fairly in everything we do, in every location and country we operate. We aim to be a leader in our industry, by working with integrity in all our partnerships. To support this, we have procedures in place to make sure we follow competition laws.

We provide training so everyone understands their responsibilities. If you're ever unsure about a trading practice, please ask for help. You can speak to our Group Director of Legal (see Key Contacts on [page 18](#)).

We all have a part to play. By following these rules, we protect our jobs, our business, and help keep the market fair for everyone.

## Supplier relationships

We're committed to working together to build lasting partnerships with our key suppliers built on honesty and trust, to help us to grow and succeed. If you work with suppliers, you must follow the Procurement Ethics Code.





## Procurement

We're committed to buying goods and services based on these key principles:



**Best value:** we look at quality, cost, and delivery to get the best deal.



**Sustainability:** we choose suppliers that are good for the environment and respect human rights in all our operations, supply chains and local communities.



**Be clear and fair:** we're open and honest, so there's fair competition and accountability.



**Meet customer needs:** deliver and supply products aligned with customer codes of conduct, policies, and requirements



**Do the right thing:** we always act with honesty, fairness and respect in all our purchases.



**Follow the rules:** we follow all laws, regulations, and policies/procedures when buying goods and services.

## Our environment

We're committed to doing business in a responsible way that protects the environment. That means using and reusing our resources efficiently, reducing waste and always looking for ways to improve. We follow a framework for environmental improvement and regularly review our progress. Everyone has a role to play, your daily decisions and actions can help make a real difference. We have an ambition to be seen as a leader in environmental responsibility, minimising the impact of our operations on the local and global environment and on the communities where we operate.

Think about yours and others environmental impact, and help us to reduce these.

**We're focused and committed to working with our suppliers, contractors and customers to:**



**Cut down on resource use and waste**



**Reduce our energy use and carbon footprint**



**Use less water and protecting water quality**



**Protect wildlife and biodiversity**



**Improve packaging by using less single-use plastic and more reusable/recyclable materials**

Looking after the environment is everyone's responsibility. Small actions add up and we can all help by spotting ways to reduce environmental impact in the workplace (Help Roi). Together, we can make a big difference.

## Political contributions

### and activities

We support your rights to take part in civic and political activities in your own time, but you must not act or speak on behalf of Greencore in any political activity.

## Financial accounting

As a public company, we're committed to being transparent about our performance and how we run our business. This helps us meet legal and financial rules and protect shareholder value. We expect everyone involved in financial and operational reporting properly approves, records, and reports our business activities, while following our company policies and legal requirements.

## Charitable support

We're proud to support charities and local community projects through volunteering, fundraising and donations. We work with national industry charities and our sites and depots regularly get involved in local causes too.





# Sustainable choices

## Sustainability and a better future

We're committed to creating a positive impact on people and the planet, so that we can be proud both of what we do and how we do it. Our commitment to sustainability is rooted in our Better Future Plan. We expect everyone to make sustainability part of every choice they make.

We have four areas of focus:



### Making with Care

We prioritise the efficient use of resources such as electricity, gas and water and are always looking for better ways to manage our use. We're also aiming to cut our food waste in half by 2030, and we need everyone's help to make this happen.

### Feeding with Pride

We'll focus on packaging that protects our products while also reducing waste and minimising environmental impact. Our products show our commitment to taste, freshness, sustainability and health. With your help, we're committed to helping create a food system that benefits both people and the planet.

### Sourcing with Integrity

We're committed to improving how we source goods and services and making sure they are ethical, sustainable, and responsible. We'll work closely with our suppliers to work through the complexities of our industry, aiming to improve supply chain standards, reduce impact on the environment, and respect human rights. We count on everyone to support these values in every decision they make.

### People at the Core

People are central to our success. By supporting each other and helping those in our local communities, we can live our purpose, 'Making every day taste better'. Through our partnerships with charities, we're committed to redistributing surplus food to those in need and are always working to support our communities through non-food channels. Our ambition is to create a workplace where ethical conduct, respect for human rights, and colleague wellbeing are central to our operations.

We can all make decisions that protect our planet and support our long-term goals.

# Delivery excellence

## Risk Management

We know that managing risks is key to our success and supports us to achieve our goals and deliver for our customers. We're committed to being aware of the risks we face and make informed decisions. We understand that risk management doesn't mean removing all risk and sometimes that we may choose to take some risks to support our ambition.

We expect you to understand your role in managing risks and to act in a way that avoids unnecessary risk to you, your colleagues and the business.

## Bribery and Corruption

We don't accept any form of bribery or corruption. We strictly follow all laws and regulations, and our commitment to ethical business practices means you must never offer, accept, or ask for bribes, including facilitation payments (small payments to speed things up). All decisions should be made in the best interest of the company and not for personal gain. Our Anti-Bribery & Corruption Policy explains this in more detail, and additional training may be required depending on your role.



### Gifts and Hospitality

Sometimes giving or receiving gifts, hospitality or other benefits is part of normal business, but we must be careful. Gifts must never be too frequent, of high value or influence decisions, so be careful when offering or accepting them, especially from government officials. Gifts must be approved and registered in line with our policy. Cash should never be offered or accepted as a gift.

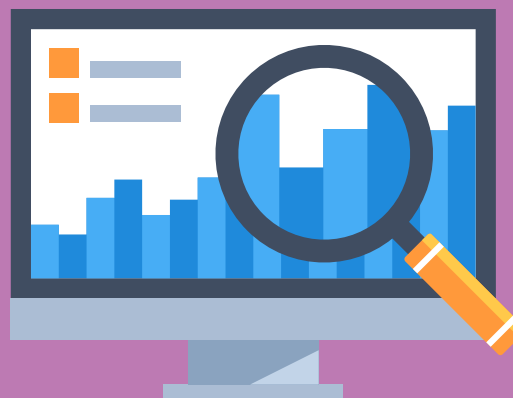
If you have any questions about whether a gift, hospitality or other benefit offer follows our policy, please speak to your line manager or contact our Group Director of Legal (see Key Contacts on [page 18](#)).

### Confidentiality

We all have a responsibility to protect confidential information about Greencore, our colleagues, our business partners and key stakeholders. This information must be kept secure and only shared if you're approved to do so. Our IT systems and policies are regularly reviewed to make sure we have the right measures in place to protect this data from accidental or unauthorised access, alteration or loss.

### Data Privacy

We're committed to keeping personal information safe. Everyone must handle personal data carefully and follow the law and our data protection policy. This includes making sure data is collected, processed, stored, and disposed of securely and only used for legitimate business reasons. If you see a data issue or 'near miss', report it straight away to the Data Protection Manager at [data.protection@greencore.com](mailto:data.protection@greencore.com).



### Insider Trading & Market Abuse

Insider trading means using information that is not publicly available, which you may have access to due to your role or business relationship, which could affect the value of our shares or securities. You may become aware of confidential information through your role, and it's your responsibility to make sure this information is not used for personal gain or to benefit others. Trading securities or manipulating share prices based on such information is strictly prohibited. Anyone found guilty of insider trading could face severe penalties, including fines or jail time, and will also face disciplinary action at work. We have strict rules on share trading, managed by the Company Secretariat and Legal Team. If you're ever unsure about whether information is considered inside information or whether you're permitted to trade, you must ask for advice before acting.



### Anti-Tax Evasion

We're committed to fully complying with tax laws and regulations. We have zero tolerance for tax evasion or helping others evade tax. We have a Corporate Criminal Offence Policy that sets out how we prevent tax evasion and what's expected of everyone in our business.

Fraudulent tax evasion is a crime that means knowingly helping someone avoid tax or failing to raise concerns. Mistakes or carelessness are not the same as fraud, but we still must take care. If anyone connected to the business helps with tax evasion, we could be held responsible. That's why it's vital that everyone acts honestly, raises any concerns or suspicions and follows the policy at all times.

### Conflicts of Interest

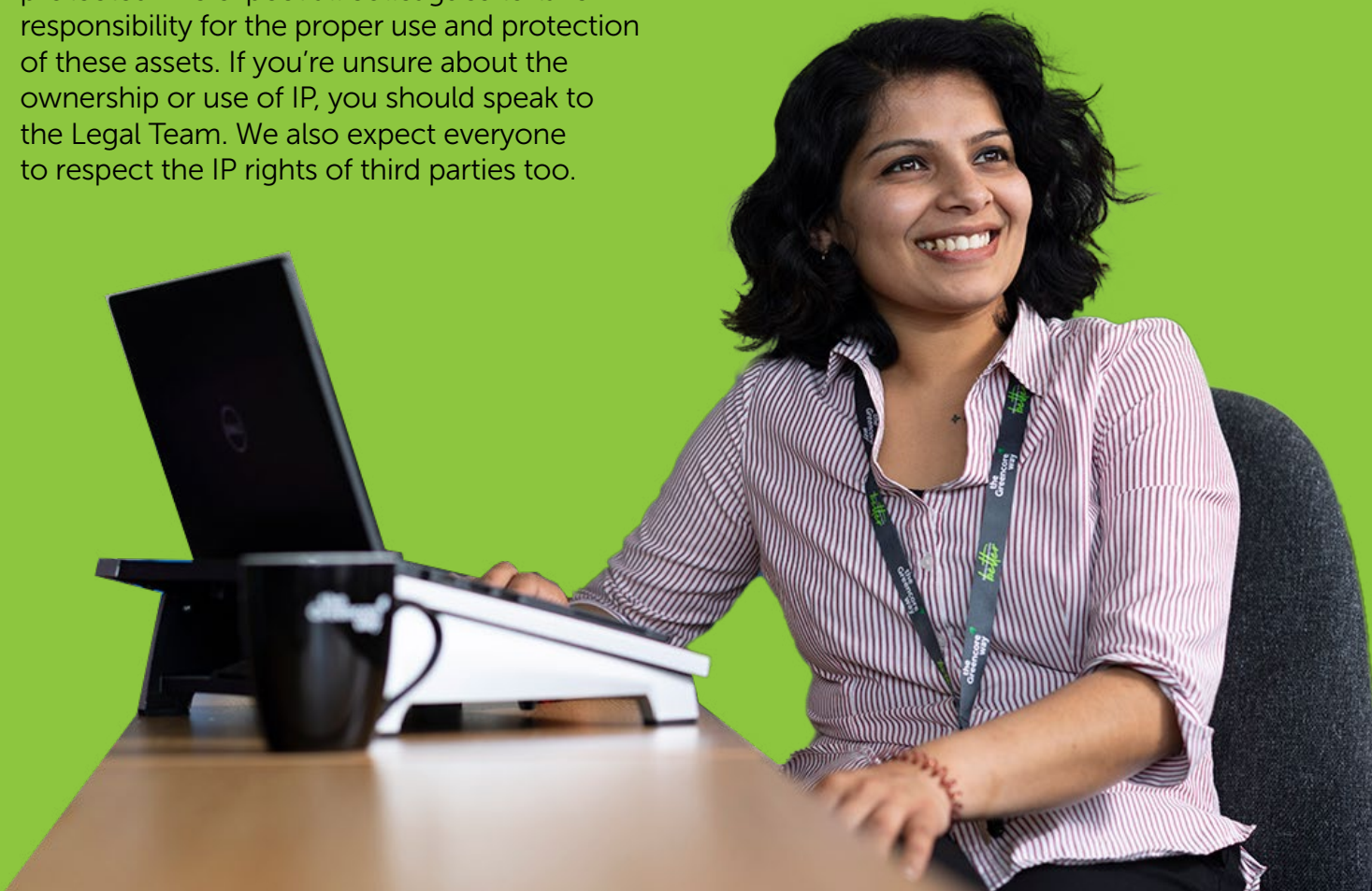
You must always act in the best interests of Greencore. A conflict of interest happens when your personal interests could affect how you do your job. If you think you have a conflict, like a close family connection, property or financial interest or outside activity, you must report it using our company disclosure procedure. Talk to your manager, our Group Director of Legal, or our Group

General Counsel & Company Secretary (see Key Contacts on [page 18](#)) if you're unsure. Being open and honest in managing conflicts helps protect your integrity and our reputation.

### Protecting Our Assets/ Intellectual Property

We hold valuable assets, such as trademarks and other intellectual property (IP). Unless prohibited by law, all IP created using our materials, at our expense, and on our time belongs to us and must be used and protected. We expect all colleagues to take responsibility for the proper use and protection of these assets. If you're unsure about the ownership or use of IP, you should speak to the Legal Team. We also expect everyone to respect the IP rights of third parties too.

In addition, valuable business resources, including property, equipment, stock, time, confidential information, computer hardware and software, and funds, must be kept safe. We're all responsible for protecting our assets and must act to prevent damage, misuse, or loss.



## Fraud

Fraud is a serious crime that damages our business and reputation. We expect the highest standards of honesty in everything we do and have a zero-tolerance policy. We're committed to preventing, detecting, investigating, and addressing any form of fraud. Everyone is expected to act with integrity and stay alert to any behaviours or activities that seem dishonest. We encourage all colleagues to speak up if they have concerns or suspicions, and we will protect anyone who raises a concern from retaliation. Our Speak Up! process is there to support this (see [page 5](#)).

Our commitment to ethical conduct and legal compliance is non-negotiable, and we expect everyone to contribute to the integrity of our business.

## Sanctions

Sometimes governments may place restrictions (called sanctions) on certain countries, companies or people. We'll make sure to understand and follow these restrictions, check our suppliers carefully and get legal advice when needed. It's essential that all colleagues involved in supplier engagement, commercial decisions, or international operations understand and follow these requirements. Everyone has a responsibility to act with care and to raise concerns if they suspect a potential breach.

We'll not do business with any restricted areas or people.



# Thank you!

We appreciate your help in making sure we always follow this Code of Business Conduct, as well as the related policies, procedure manuals and guidelines. Together, with your support and commitment to doing the right thing every day, we'll maintain our reputation as a business that operates with honesty and truth.

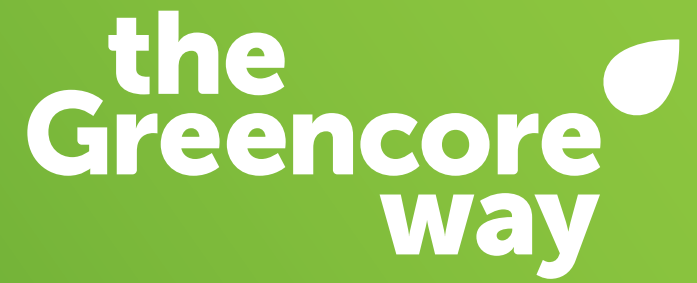




# Key contacts

If you have any questions about this Code of Conduct and related policies, you can speak to your line manager or contact the following people:

| Area   | Name             | Role  | Contact  |
|--|------------------|---|--|
| <b>Speak Up!, Policies &amp; Risk Management</b> | Ravi Popat       | Director of Internal Audit, Risk, Controls & Compliance (Independent Senior Leader) | <a href="mailto:ravi.popat@greencore.com">ravi.popat@greencore.com</a>             |
| <b>Policies &amp; Risk Management</b>            | Ross Poulter     | Head of Risk, Resilience, & Policy Oversight  | <a href="mailto:ross.poulter@greencore.com">ross.poulter@greencore.com</a>         |
| <b>Legal &amp; Company Secretariat</b>           | Damien Moynagh   | Group General Counsel & Company Secretary.  | <a href="mailto:damien.moynagh@greencore.com">damien.moynagh@greencore.com</a>     |
| <b>Legal</b>                                     | Graham Dowling   | Group Director of Legal   | <a href="mailto:graham.dowling@greencore.com">graham.dowling@greencore.com</a>     |
| <b>Safety, Health, &amp; Environment</b>         | Pamela Brown     | Director of Health, Safety and Environment  | <a href="mailto:pamela.brown@greencore.com">pamela.brown@greencore.com</a>         |
| <b>HR</b>  | Karen Rugg       | Director of People Services   | <a href="mailto:karen.rugg@greencore.com">karen.rugg@greencore.com</a>             |
| <b>Food Safety &amp; Quality</b>                 | Clare Binnington | Group Technical & Sustainability Director   | <a href="mailto:clare.binnington@greencore.com">clare.binnington@greencore.com</a> |
| <b>Sustainability &amp; Human Rights</b>         | Fran Haycock     | Head of Sustainability  | <a href="mailto:fran.haycock@greencore.com">fran.haycock@greencore.com</a>         |
| <b>Procurement &amp; Suppliers</b>               | Andrew Thompson  | Group Procurement Director  | <a href="mailto:andy.thompson@greencore.com">andy.thompson@greencore.com</a>       |
| <b>Financial Control</b>                         | Denise Crowley   | Group Financial Controller  | <a href="mailto:denise.crowley@greencore.com">denise.crowley@greencore.com</a>     |



**[www.greencore.com](http://www.greencore.com)**

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