

Greencore Group Plc

Ethical Code & Employment Standards

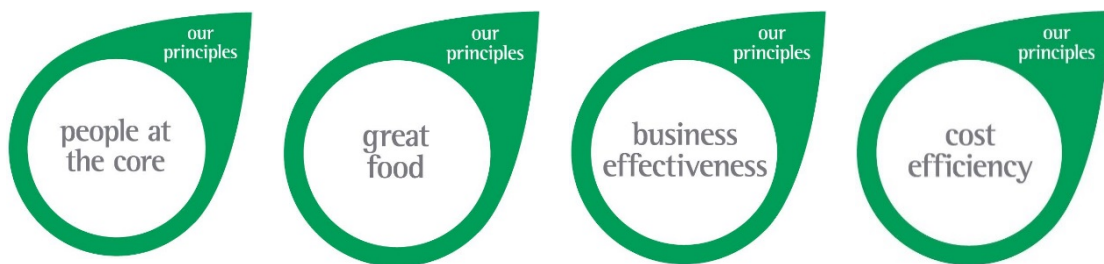
Introduction

Greencore has a vision to be a fast growing, international convenience food leader. Our strategy is to be a food to go leader in the UK, US and other markets supported by leading positions in complimentary convenience food categories.

Strengthening our organisation and culture is critical to the success of our strategy, and we have designed a simple model that brings together all the key elements of who we are, what we are about and how we will succeed – This is called The Greencore Way.

The Greencore Way has four key principles;

- People at the Core
- Great Food
- Business Effectiveness
- Cost Efficiency



Embedding these principles within our business means operating in a sustainable and responsible way.

Policy Statement

We are committed to ensuring a high standard of ethical and environmental practices and believe that we have a responsibility to adhere to the highest standards of behaviour and care. We recognise that our business activities have the potential to impact on our key stakeholders and therefore they have the right to expect high level of standards in what we do.

We commit that by using the Greencore Way principles our business will;

- Ensure that all products manufactured and sourced by Greencore are produced under working conditions that are hygienic and safe.
- Ensure that all workers involved in the production of products sold by Greencore from direct, indirect suppliers and our own service providers are treated with dignity and respect.
- Act in an ethical manner within all legal requirements.
- Commit to a programme of implementing the principles of the Ethical Trading Initiative Base Code.

All Greencore sites are active members of the Sedex management system and will complete their site details linked to the customers that they serve.

Acting with Integrity

Integrity is fundamental to the Greencore Group and is emphasised throughout the four principles of the Greencore Way. Integrity means doing what is right. By acting with integrity, we reflect positively on the values and reputation of the company. We all want to do what is right, for ourselves and for our business. This code will help guide us. It defines how we should all conduct ourselves as representatives of the business and addresses our responsibilities to the company, to each other and to our stakeholders.



Suppliers

We aim to work with our suppliers to build effective and transparent supply chains. We are reliant on our suppliers for the ingredients and services we use to create great food and have a rigorous supplier approval process, operated by our central purchasing and technical functions. This includes the monitoring of social standards in our supply chain and we encourage our suppliers to operate to the same ethical standards that we employ ourselves. Greencore is a member of Supplier Ethical Data Exchange (SEDEX) and we have been building SEDEX membership progressively across our supply base. We now require any new material suppliers to our business to be SEDEX registered and will continue to bring existing suppliers into the scheme.

(Greencore Group Sedex No. ZC1038996)

Fair Trading

In order to promote stable business relationships in which any necessary advancement can be made, Greencore companies and their agents will make a commitment to fair trading by agreeing clear contract terms with suppliers. The livelihood of vulnerable companies will not be jeopardised by unfair contractual dealings. Contract terms will be agreed at the beginning of each contract and will include specifications and payment terms. This does not affect the necessity of ensuring product safety or of buying competitively.

Respect for the Individual

Greencore aspires to achieve a workforce that is truly representative of the society that we work within, opposing all forms of discrimination and providing all colleagues with the following commitments:

- Greencore will do all it can to create an environment in which individual differences and the contributions of all our colleagues are recognised and valued.

- Greencore will not tolerate any form of intimidation, bullying or harassment of its colleagues: everyone is entitled to a working environment that promotes dignity and respect.
- Greencore will ensure that training, development and progression opportunities are available to all Greencore employees.
- Greencore will continuously review its employment practices and procedures to ensure fairness.
- Greencore will regard breaches of these commitments as misconduct that may be subject to disciplinary proceedings.
- Greencore believes that equality in the workplace is a cornerstone of our Greencore Way principle - People at the Core.

The Company will take all reasonable steps to ensure decisions to employ, train, develop and promote colleagues is made on the basis of an individual's abilities and qualifications.

Broad Business Behaviour

What is expected of everyone

Greencore's business practices are governed by integrity, honesty, fair dealing and compliance with all applicable laws. Our colleagues uphold and live this commitment in their everyday responsibilities and our reputation remains one of the Company's most important assets.

Colleagues should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each person to "do the right thing", a responsibility that cannot be delegated.

If ever in doubt about a course of conduct, colleagues should ask themselves:

- Is it consistent with the Code?
- Is it consistent with the Greencore Way?
- Is it Ethical?
- Is it Legal?
- Will it reflect well on myself and the Company?
- Would I want to read about it in the Newspaper?

If the answer is 'No', to any of these questions, don't do it. If you are still uncertain colleagues should ask for guidance from any of the following:

- Their line manager
- The HR team
- Other Company policies that will be available elsewhere;
 - Health and Safety Policies
 - Bribery and Anti Corruption Policies
 - Employment policies
 - Other Legal and Compliance policies

All the above and more are available in the local HR Office or displayed on the Company Intranet.

What is expected of Managers?

Managers should promote a culture of Ethics and Compliance.

Managers should at all times model appropriate conduct. As a manager, you should:

- Ensure that the colleagues you supervise understand their responsibilities under this Code and other Company policies;
- Make opportunities to discuss the code and reinforce the importance of ethics and compliance with colleagues;
- Create an environment where colleagues feel comfortable raising concerns without fear of retaliation;
- Consider conduct in relation to the code and the Greencore Way when evaluating colleagues;
- Never encourage or direct colleagues to achieve business results at the expense of Greencore's Ethical Policy or the principles of the Greencore Way;
- Always act to stop violations of our Ethical Policy by those colleagues that you supervise.
- Ensure Greencore support for the Stronger Together Campaign is fully adopted at each site.

Greencore Employment Standards – General Provisions

The general provisions of the policy apply to;

- Staff directly employed by Greencore, either on temporary or permanent contracts.
- Staff employed or provided by contractors or employment agencies to work on Greencore premises or to undertake work for and on behalf of Greencore.

1. No forced, bonded or involuntary labour shall be used

- All employment with Greencore is freely chosen. Colleagues must not be required to lodge deposits or identity papers with us and colleagues are free to leave the business after reasonable notice.

2. No child labour shall be used

- All colleagues must have reached the age of 18, or have reached the minimum legal working age under national law, whichever is the higher.

3. All colleagues have a right to join a recognised trade union

- Colleagues have the right to join a recognised trade union and to organise collective bargaining in a lawful and peaceful manner and should not be discriminated against for being engaged in lawful trade union activities.

4. Working Conditions are safe and hygienic

- All colleagues are entitled to a safe, hygienic working environment and working conditions will meet with all National Health and Safety Laws and standards. Greencore takes all adequate

measures to prevent accidents and minimise potential hazards and all colleagues receive regular Health & Safety training which is recorded in writing.

- All Health and Safety Policies are written and published on notice boards, copies are also available from the Site Health & Safety Office.

5. *No discrimination is practised*

- There is no discrimination in pay, hiring, compensation, access to training, promotion and termination of employment on the grounds of race, nationality, religion, age, gender, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all Greencore colleagues.

6. *No harassment, threats, abuse or intimidation shall be practised*

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are strictly prohibited.

7. *Working Conditions and remuneration are comparable to other companies in our sector and regular employment is provided*

- Rates of pay comply with legislation regulating employment, hours of work and pay including minimum wage, national living wage, allowances and benefits are comparable in relation to similar jobs in our market place;
- Normal working hours do not exceed 48 hours per week, (excluding overtime);
- Colleagues must not be required to work excessive hours and may not ordinarily and regularly work more than 60* hours per week, including overtime. Whilst contracts will normally provide for at least 2 days off per week, all colleagues are entitled as a minimum, to take at least one day off in each 7 days period. Overtime must be strictly voluntary and paid for at a premium rate.

*(*However these levels may be exceeded on a short-term basis (several days) where it can be demonstrated that exceptional circumstances apply, such as unexpected production periods or emergencies).*

- Colleagues are provided with written terms and conditions of employment that provides details of the employment relationship and the respective obligations of both the employer and employee. Such as; rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment;
- No deductions are to be made from wages as a disciplinary measure and an individual pay slip detailing the lawful deductions is provided for every pay period.

8. *Employment Agencies*

All employment agencies contracted to supply temporary workers must demonstrate a commitment to and the application of the requirements of this code.

They must ensure that all temporary workers supplied to Greencore are eligible to work in the UK, subject to the rules laid down by the UK Border Agency. In addition agencies must ensure that all temporary workers supplied to Greencore possess a sufficient command of the English language to understand:

- Greencore Health & Safety and Food Safety requirements;
- Written Contractual documents.

Health, Safety and Environment

Greencore is committed to conducting its business in a manner, which complies with country specific and other relevant local legislation, minimises adverse effects upon the environment and protects the health, safety and welfare of all colleagues and others affected by our activities.

We consider the effective management of **Safety, Health and Environmental** risks to be of equal importance to other activities for the efficient operation of the business.

Through a process of continual improvement Greencore will ensure it meets its obligations as a responsible International Company by measuring and managing its **Safety, Health and Environmental** performance.

The Managing Director of each Division is ultimately responsible for the **Safety, Health and Environmental** risks and the management of those risks. This responsibility is devolved to the local management within each Division through the principle that:

“Where all line managers including Directors, Managers, Supervisors or other employees have responsibility, accountability and authority for business operations they also have responsibility and accountability for ensuring that associated safety, health and environment issues are controlled”

All Sites within Greencore will ensure as a minimum this policy is adopted, communicated and implemented.

Employee Ethics and Compliance Hotline (Whistleblowing)

Greencore is committed to achieving an open working environment in which you feel able to report directly to your Manager. However, there may be times when a colleague is not comfortable with that or feel unable to do so. To overcome these potentially difficult circumstances and to protect you, Greencore has joined **EXPOLINK**.

EXPOLINK is an anonymous, free to call and confidential service to enable colleagues to report any concern. It could be a food safety or quality issue, criminal activity, fraud, theft or damage to property by the Company, its management, supervisors, employees or suppliers. It may be more personal, such as discrimination, bullying or harassment. **EXPOLINK** can also be used when colleagues have a really good idea but do not wish to be identified.

EXPOLINK is a completely independent organisation with impartial staff trained to handle these types of calls. Colleagues can phone in total confidence knowing that the call will not be traced or recorded – and they will not even be asked for a name. The information that is given to **EXPOLINK** will be passed on to one of the company’s senior executives who will act on it without compromising the caller in any way. There’s no charge; colleagues can even call from home for total privacy. **EXPOLINK** gives a unique code number to make it easy to phone back with more information if the colleague wishes.

You can contact **EXPOLINK** free from any phone in your country, 7 days, 24 hours. Just dial one of the following numbers:

UK: 0800 374199
Ireland: 1800 567014
USA: 1877 5335310

Assessment of Compliance and Monitoring

Compliance with this policy will be monitored as part of normal site or supplier assessment. Agents for Greencore must take responsibility for the compliance of their supply sources to this Policy as to other requirements.

Actions in the case of non-compliance will be required in the context of the relevant culture and the ratification status of any relevant or new ethical or legal standards. Firm, but sensitive, insistence on gradual improvement can help change the cultural and political environment to enable movement to more acceptable practices.

All our suppliers are expected to work towards implementation of this policy, and demonstrable compliance or, where applicable, constructive action towards achieving compliance, and will be taken into consideration during approval of suppliers.