



Upfield Code of Conduct

Our Recipe for Growth and Success

[Click Here to Begin](#)

December 2022 | Version 2 | Upfield.com





Upfield Code of Conduct

Table of Contents

We are Upfield

- 4** A Message from David Haines, Group CEO ▶
- 5** Upfield's Vision, Purpose and Values ▶

We Do the Right Thing

- 7** Upfield Compliance and Integrity ▶
- 8** Doing the Right Thing ▶
- 9** How do We Uphold the Code of Conduct? ▶

For Each Other

- 11** Health and Safety ▶
- 12** Diversity and Inclusion ▶
- 13** Social Media ▶

For Our Business

- 15** Respecting the Rules ▶
- 16** Fair Competition ▶

- 17** Avoiding Conflict of Interest ▶

- 18** Responsible Gifts and Hospitality ▶

- 19** Information Security ▶

- 20** Compliance with Trade Laws ▶

For Our Consumers

- 22** Product Quality ▶

- 23** Responsible Marketing ▶

- 24** External Communication ▶

- 25** Privacy ▶

For Our Communities

- 27** Respecting Human Rights ▶

- 28** Environmental Sustainability ▶

- 29** Glossary ▶

- 30** Contacts ▶



We are Upfield

A Message from David Haines, Group CEO

Upfield's Vision, Purpose and Values

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

We are Upfield

This section is about our love for all things plant-based.

In this Section:

- 4** A Message from David Haines, Group CEO ▶
- 5** Upfield's Vision, Purpose and Values ▶

Glossary ▶

Contacts ▶





We are Upfield

A Message from David Haines, Group CEO

Upfield's Vision,
Purpose and Values

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

A Message from David Haines, Group CEO

In Pursuit of a Better Plant-Based Future

Dear Upfielders,

Since we formed Upfield, we have been focused on our vision to pursue a better plant-based future.

Upfield is a growth company, a plant-based leader and the future of food. Put simply, we are Generation Plant. A global community of insurgents, innovators and foodies, at the heart of a plant-based revolution. Regardless of job, business title or location, we are united by a common purpose — to provide consumers with delicious plant-based food that is better for their health and the planet.

Together, we are part of something transformational. The plant-based foods revolution is here to stay, and we are confidently leading it through our iconic brands. As innovators and foodies, we find new ways to make our products even more delicious and nutritious while pushing the boundaries of functionality and sustainability. We continue to unlock the potential of natural plant-based ingredients to bring delicious plant-based foods to consumers everywhere.

It is this attitude that has established us as the world's largest and most-established start-up in FMCG. We are a team of Upfield insurgents, but we never cross the line. The Upfield values of performance, care and passion remind us of our individual responsibility to act with the utmost integrity and make good decisions every day. It's the key to our success.

We set this expectation for our customers and partners and have done since we started pioneering plant-based foods in



1871, so we must not only continue to deliver in line with these standards but raise the bar every time.

The Upfield Code of Conduct is tailor-made for Upfielders. It reminds us of the guidelines and core values we must follow to ensure we all succeed as we continue to pursue a better plant-based future. This Code of Conduct establishes our shared values and policies that will help us avoid scoring any unnecessary own goals.

Please take the time to read this interactive document thoroughly and regularly. Use the navigation toolbar at the left to quickly go to the right section to know how to act responsibly. It will ensure we are doing the right thing and help Upfielders succeed.

The future is plant-based, it's better for you, it's better for the planet and it most importantly, it tastes incredible. Many thanks to all members of Generation Plant, our Upfielders, for pursuing our vision and purpose everyday in line with this Code of Conduct.

Warm regards,



David Haines

Group Chief Executive Officer



We are Upfield

A Message from David Haines, Group CEO

Upfield's Vision, Purpose and Values

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Upfield's Vision, Purpose and Values

As Upfielders, we work toward our vision and mission with a responsibility to act on our values in everything we do. Whatever the task, we think about how we perform. We bring our passion. We show our care.

Our Vision

A better plant-based future.

Our Purpose

To make people healthier and happier with great tasting, all-natural plant-based products that are better for you and for the planet. Our delicious natural ingredients come from plants, and we are working towards making sure our packaging does too.



What We Stand For

At Upfield, our values shape our approach to the way we work. They help us do the right thing for each other, for our business and for our consumers.

- **Performance:** We own Upfield and take responsibility for its success and the future it can create; we are all Upfielders. We strive for and deliver the highest quality in all we do. We are data-driven, passionate and are not afraid to push boundaries to meet the needs of our consumers.
- **Care:** A more sustainable future is our core belief. We work together to do the right thing for Upfield, our consumers and the planet.
- **Passion:** We are proud to be Upfielders. We love what we do and want to bring joy to the lives of our consumers, our business partners and fellow Upfielders. We see limitless possibilities to drive Upfield forward, we are unconstrained by the past and thrive on making a difference.



We are Upfield

We Do the Right Thing

Upfield Compliance and Integrity

Doing the Right Thing

How do We Uphold the Code of conduct?

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶



We Do the Right Thing

This section is about who we are, how we do what's right and how we fix what's wrong.

In this Section:

- 7** Upfield Compliance and Integrity ▶
- 8** Doing the Right Thing ▶
- 9** How do We Uphold the Code of Conduct? ▶



We are Upfield

We Do the Right Thing

Upfield Compliance and Integrity

Doing the Right Thing

How do We Uphold the Code of conduct?

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Upfield Compliance and Integrity

Upfield is built on a culture of honesty, integrity and doing the right thing. Compliance is critical to maintaining our reputation with our stakeholders, strengthening our competitive advantage, and driving sustainable long-term growth.

Upfielders are responsible for upholding a culture of compliance and integrity. This means:

- **We pursue our common purpose** with honesty and integrity.
- **We refrain from doing** anything that would harm our reputation.
- **We make decisions that are consistent** with our values and act in an ethical way.
- **We are agile, we adapt, we aren't afraid to experiment, and we stay accountable.** That means never crossing the line.

As Upfielders, we pursue our common goals with passion, and utilize our innovative skills. However, we must do this with transparency, honesty, integrity and within the boundaries of what is ethical and compliant.



By doing this, you are protecting the reputation of the company and your own reputation, as individuals are also liable for prosecution.

Living the Code of Conduct everyday enforces our ethical standards, builds trust with Upfielders, customers, consumers, investors, and communities and helps us win with integrity.



We are Upfield

We Do the Right Thing

Upfield Compliance and Integrity

Doing the Right Thing

How do We Uphold the Code of conduct?

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Doing the Right Thing

Whatever we do, we act with integrity. We hold ourselves and fellow Upfielders accountable. We call out unacceptable behaviour. We make sure everyone's actions meet the high standards we set ourselves and are in line with our values.

Making the Right Decision

Consider the following four steps and questions:

- 1. Information:** Do we have enough information about this issue to make this decision?
- 2. Legal:** Am I certain that this is allowed by the law of the country I am in and consistent with Upfield policies?
- 3. Ethics:** Would I be able to tell my partner about this with a clear conscience when I come home from work?
- 4. Reputation:** If this were printed in the newspaper, would I feel comfortable with my name being associated with it?

If, on any of these questions, your response is “No”, don't do it. Ask your manager or an expert (e.g. someone from Human Resources or Legal and Compliance) for support to make the right decision.



Is there a place for me to report a potential violation of the Code of Conduct?

- **Our Speak Up Line** is available [here](#) 24 hours a day, 7 days a week. It is independent, secure and confidential. It provides a channel for anonymous reporting of any potential violations of the Code of Conduct.
- Upfielders can also refer to the [Contacts](#) page to find out where to go for advice and guidance on our Code of Conduct.



Additional Information and Resources

For more details, see our [Speak Up Policy](#).



We are Upfield

We Do the Right Thing

Upfield Compliance and Integrity

Doing the Right Thing

[How do We Uphold the Code of conduct?](#)

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

How do We Uphold the Code of Conduct?

Upfield's reputation for doing business with integrity and respect for others is an asset — it's as valuable as our people and our brands. Maintaining our reputation requires the highest standards of behaviour from Upfielders and third-party business partners alike.

It's on all of us to uphold the Code of Conduct and other company policies. That means:

- **Reading, understanding and following** the Code of Conduct and supporting policies.
- **Avoiding any practices that may lead to unlawful conduct** or harm to Upfield's reputation.
- **Immediately reporting actual or potential breaches** of the Code of Conduct through the established [Upfield channels](#).
- **Undertaking relevant training** as required by line managers or Legal and Compliance.
- **Not discussing a reported breach with other colleagues**, unless permitted by your manager or Legal and Compliance.

Upfielders at the manager level and above should act as positive role models by:

Speak up without Fear

We all have a responsibility to report possible violations of the Code of Conduct immediately. If you sense that something does not feel or look right, you should notify at least one of the following:

- Your line manager
- Legal and Compliance
- Human Resources
- Speak Up Line

- **Leading by example**, setting a strong tone from the top and showing familiarity with the Code of Conduct and related policies.
- **Taking steps to embed a culture of integrity** across all operations.
- **Ensuring that all team members have read the Code of Conduct** and relevant policies — particularly new joiners.
- **Offering support around the Code of Conduct and Upfield policies** to their team where needed, and helping resolve and escalate issues when they arise.

No adverse action will be taken against any Upfielder for reporting a suspected violation of the Code of Conduct (or its supporting policies) — unless the allegation made or information provided is found to be intentionally false or not made in good faith.



Additional Information and Resources

For more details, see our [Speak Up Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

Health and Safety

Diversity and Inclusion

Social Media

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶



For Each Other

We are a global community of insurgents, innovators and foodies. This section is about how it starts with us.

In this Section:

- 11** Health and Safety ▶
- 12** Diversity and Inclusion ▶
- 13** Social Media ▶



We are Upfield

We Do the Right Thing

For Each Other

Health and Safety

Diversity and Inclusion

Social Media

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Health and Safety

We strive to deliver the highest quality in all we do. To do that, working conditions need to be healthy and safe.

Health and safety is a team sport. We all have a role to play to keep our workplace safe. This means we only undertake work that we are trained, competent, medically fit, sufficiently rested and alert enough to do. We all take responsibility for the occupational health and safety of other Upfielders and any third parties we work with.

Doing the Right Thing

All Upfielders and visitors of an Upfield site must work and behave safely. That means we:

- **Follow all health** and safety procedures.
- **Respect Upfield** property and assets.
- **Make sure that those we work with**, including contractors and visitors, also know and follow health and safety procedures.
- **Make sure we know what to do if an emergency occurs.** This applies to our place of work as well as sites we are visiting.

Scenario Q&A

Scenario: I notice an equipment malfunction. Although I am not trained on the task, I know how to fix it, which would save us time and money — there's no need to tell anyone. What should I do?

- **Response:** It is good to see eagerness in our people to keep operations running. It is even more important, though, to keep everyone safe. Always notify the area supervisor or the line manager of potential issues you have identified and discuss the possible solutions with them. Never undertake tasks that you have not been trained for or which you are not authorised to do.

- **Never show up to work in a condition that could prevent us** from doing our jobs properly or that could create a dangerous situation. This includes being under the influence of alcohol or drugs.
- **Report to local management any unhealthy or unsafe activity**, so that steps can be taken to correct, prevent or control those conditions immediately.



Additional Information and Resources

For more details, see our [Health and Safety Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

Health and Safety

Diversity and Inclusion

Social Media

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

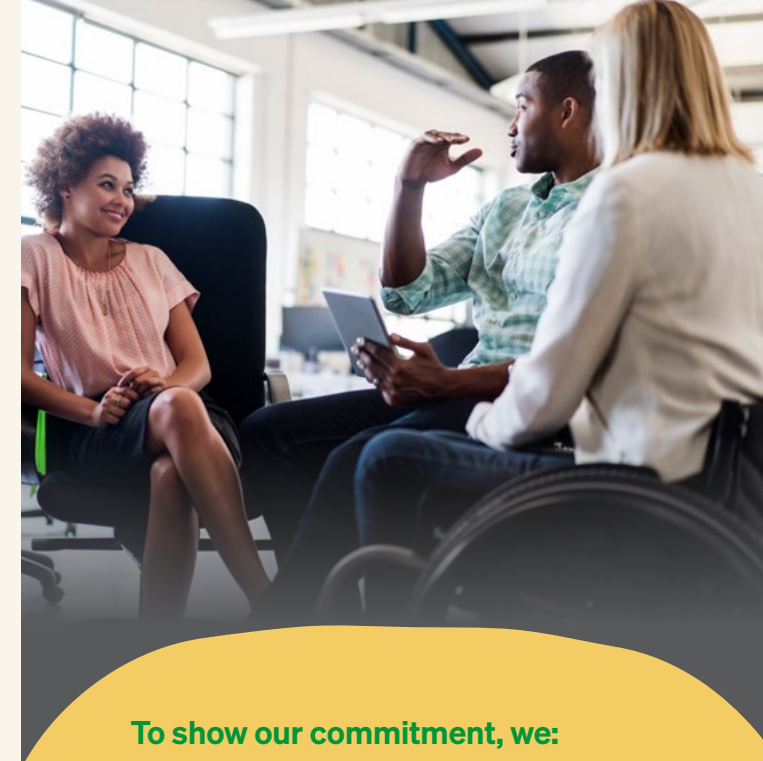
Diversity and Inclusion

We work every day to create an environment where everyone can be themselves. All Associates should know and feel that they belong. Welcoming everyone to “come as they are”, is the right thing to do and is an essential ingredient for sustainable growth.

With a diverse mix of people and a culture where everyone can come as they are, we generate better ideas and do better work. We define diversity in the broadest sense: it is about all the characteristics that make us who we are.

This includes the identities we have according to traditional demographics like age, ethnicity, gender, religion, disability and sexual orientation but also other things such as our socio-economic background, caring responsibilities, gender identity, gender expression, personality, mental health, physical appearance and much more. Some of our differences are visible and some are invisible. Everyone is unique. We celebrate this, and the different contributions we all make.

We believe everyone should have equal access to opportunities. We work to break down barriers and drive equality. The basis for recruitment, development, training, compensation and advancement is an individual’s performance, skills, behaviours, experience and knowledge.



To show our commitment, we:

- **Do not engage in any direct or indirect behaviour** that is offensive, intimidating, malicious or insulting. This includes any form of bullying or sexual harassment.
- **Do not tolerate discrimination or harassment of any kind**, whether it be inside or outside of our workplaces, online or in person.
- **Report any concerns** via our confidential reporting tool: [Speak Up](#).



Additional Information and Resources

For more details, see our [Diversity & Inclusion Statement](#) and [Human Rights Statement](#).



We are Upfield

We Do the Right Thing

For Each Other

Health and Safety

Diversity and Inclusion

Social Media

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶



Social Media

Many of us connect with family, friends, colleagues and consumers around the world through social media. While doing so, be mindful that posting to social media channels can result in unintended consequences that could impact both you and Upfield.

We encourage all colleagues to take pride in their relationship with Upfield, online and offline. Whether it's social platforms for business, or social media for personal activities, if you've identified yourself as an Upfielder, remember this responsibility.

Think twice before you post. Remember: internet content can live forever.

When posting on social media, we:

- **Make sure not to misrepresent** ourselves or the company, or speak on behalf of Upfield.
- **Never disclose any personal information** — about employees, consumers, visitors or online followers — or confidential business information.
- **Avoid harassing**, defamatory or disparaging content.
- **Are sensitive** to global cultures.



Additional Information and Resources

For more details, see our [Social Media Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict
of Interest

Responsible Gifts
and Hospitality

Information Security

Compliance with
Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶



For Our Business

We are the pioneers of plant-based food. This section is about how we take responsibility for our actions.

In this Section:

15 Respecting the Rules ▶

16 Fair Competition ▶

17 Avoiding Conflict of Interest ▶

18 Responsible Gifts and Hospitality ▶

19 Information Security ▶

20 Compliance with Trade Laws ▶



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict of Interest

Responsible Gifts and Hospitality

Information Security

Compliance with Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Respecting the Rules

Upfield’s commitment to doing business with integrity requires consistently high global standards. No compromises. That means a zero-tolerance approach to bribery, corruption, money laundering and insider trading. Respecting the rules applies to everything Upfield does, regardless of local business practices.

Doing the Right Thing

Look out for red flags: they signal a need to ask more questions.

Corruption/Bribery

- Unusually close relationships between colleagues and suppliers
- Requests for unusual advance payments
- The third party is in a different line of business than that for which it has been engaged
- Involvement of a government official for unfair gain

Money Laundering

- Unusual payment requests, e.g. to accounts abroad or to several bank accounts
- Payments made in cash
- Requests to make payments in a form outside the normal terms of business

Watch out for these phrases:

- “My sister is applying for the role... I’ll wait until she hears back before signing the contract.”
- “Make this month’s payment into a different account.”
- “No need to disclose the details of the expense.”
- “Sign in for me, I’m running late.”
- “Hold the sale. We will need it to support our numbers for next quarter.”

Inaccurate Records

- Posting fictitious sales at month-end to meet targets
- Posting incorrect stock volumes to hide variances
- Reporting expenses in the wrong period to achieve targets
- Falsifying details in expense reports

If it sounds suspicious, [Speak Up](#)—awareness is the key to combatting these wrongdoings. It’s always better to double check.



Additional Information and Resources

For more details, see our [Anti-Bribery and Corruption Policy](#) and [Business Partner Code of Conduct](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict of Interest

Responsible Gifts and Hospitality

Information Security

Compliance with Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Fair Competition

Integrity is at the heart of what we do. That's why Upfield believes in vigorous yet fair competition. We don't need to break the law to be a leader in our category. We compete based on the quality and merits of our products, and we always respect competition laws. Upfield cooperates fully with all competition authorities.

Doing the Right Thing

To compete fairly, we follow the antitrust and competition laws in the countries where we operate. We always take responsibility for our actions, but we take extra care when it comes to legal market requirements.

That means we collaborate with others in a lawful and transparent way. We never enter into agreements (even informal) with competitors to:

- Set pricing.
- Divide territories/customers.
- Talk about our business strategies or discuss market shares in our industry.

If we are unsure about the legality of any activity, we check with Legal and Compliance. We all have a role to play to keep our company accountable.



Scenario Q&A

Scenario: A distributor employee has shared confidential pricing information about a competitor. What should I do?

- **Response:** We should tell Legal and Compliance immediately we receive any competitively sensitive information. We should not use or circulate the information.



Additional Information and Resources

For more details, see our [Competition Law Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict of Interest

Responsible Gifts and Hospitality

Information Security

Compliance with Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Avoiding Conflict of Interest

We act in the best interest of the company; it's ours, after all. It's up to all of us to ensure that Upfield is best placed to benefit from potential business opportunities. That means we should avoid a conflict, or an appearance of a conflict, between personal interests and the company's interest.

Doing the Right Thing

Upfielders must immediately tell their line manager and the Legal and Compliance team if they believe any of their activities create a conflict of interest with their role or best interest of Upfield.

Potential conflicts of interest include:

- **Commercial interest:** investments in competitors, customers or suppliers.
- **Outside employment:** including roles in public bodies and trade associations.
- **Close friends or family members:** working for, with, or investing in Upfield or other industry players.



If in doubt, think:

- How do my activities outside of Upfield impact my choices within Upfield?
- Do I, or a close friend or family member, benefit from my role in this situation?
- If this situation was reported in the press, would it reflect badly on me or on Upfield?



Additional Information and Resources

For more details, see our [Conflict of Interest Guideline](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict of Interest

Responsible Gifts and Hospitality

Information Security

Compliance with Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶



Responsible Gifts and Hospitality

Upfield’s success is based on the quality of our products and not on unethical practices: we win with integrity. All relationships must reflect this commitment.

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Sometimes it’s appropriate to offer reasonable gifts, e.g. at promotional events or product launches. However, this should be treated carefully and should always be legitimate and proportionate.

Upfield’s policy is simple. We do not exchange gifts or services that look like an attempt to improperly influence a business decision.

When it’s okay:

- Lunch with a supplier as part of a business meeting
- Branded merchandise of nominal value from a supplier

When it’s not okay:

- Any gift from a supplier during negotiations
- Any gift given in exchange for some benefit
- Any gift in cash or a cash equivalent (including gift vouchers)

Doing the Right Thing

Gifts and hospitality given or received should be nominal in value and infrequent in nature. Watch out for the three “Os”:

- **Obligation:** A gift or favour should not be accepted or given if it creates a sense of duty to influence business decisions.
- **Officials:** All gifts and hospitality to government officials — regardless of amount or reason — must be pre-approved by Legal and Compliance.
- **Off the Record:** All gifts and hospitality should be reported through the expense reporting system.

+ Additional Information and Resources

For more details, see our [Anti-Bribery and Corruption Policy](#), [Guideline on Gifts and Entertainment](#) and [Travel and Expense Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict of Interest

Responsible Gifts and Hospitality

Information Security

Compliance with Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶



Information Security

Safeguarding our information, IT systems and resources is essential for us to be who we are: a global community of insurgents, innovators and foodies. All Upfielders have a role to play in preventing security incidents that can result in financial loss or damage to our operations and brand.

Doing the Right Thing

Upfielders must be aware of our information security policy and complete security training. Information and IT resources are provided to Upfielders to support our business. We need everyone to treat them with care, including reporting any potential incidents to the Information Security team. All Upfielders accessing our IT systems or working with confidential information must be aware of our protection and access management requirements.

We protect Upfield by:

- **Understanding information security risks** associated with our roles.
- **Staying alert** to suspicious activities.
- **Following good security practices** to minimise risks, such as using strong passwords that are not shared with anyone or re-used.
- **Taking time to review** security guidance and to complete training.
- **Seeking help when not sure** and reporting anything suspicious to Information Security.



Additional Information and Resources

For more details, see our [Information Security Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

Respecting the Rules

Fair Competition

Avoiding Conflict of Interest

Responsible Gifts and Hospitality

Information Security

Compliance with Trade Laws

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Compliance with Trade Laws

Upfield is a global company. This means we are subject to many international trade laws that may affect our ability to conduct business with certain countries and individuals. These laws are complicated and change frequently.

This is why we must take particular care in relation to import and export controls, trade sanctions and boycotts. We must also carefully evaluate business opportunities within countries that are subject to sanctions and trade embargoes.

Doing the Right Thing

To comply with applicable trade laws, we must ensure that we:

- **Are familiar and comply with all applicable laws** and company policies regarding international trade restrictions.
- **Notify Legal and Compliance**, should we receive any requests from customers, suppliers or other third parties to participate in a boycott against individuals, companies or countries.
- **Seek guidance from Legal and Compliance** if we have concerns about a trade-related issue.



Scenario Q&A

Scenario: I have seen newspaper reports of civil unrest in a country where we export our products for sale. Can this impact our business?

- **Response:** If you are ever in doubt, contact any member of the Legal and Compliance team for guidance.

- **Ensure the integrity of our supply chain** and communicate our policies to third parties who conduct business on our behalf.

If there appears to be a conflict between laws, customs or local practice, get help from your regional Legal and Compliance contact.

Additional Information and Resources

For more details, see our [Trade Compliance Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

Product Quality

Responsible Marketing

External
Communication

Privacy

For Our Communities

Glossary ▶

Contacts ▶



For Our Consumers

This section is about how we deliver the highest quality in all we do.

In this Section:

- 22** Product Quality ▶
- 23** Responsible Marketing ▶
- 24** External Communication ▶
- 25** Privacy ▶



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

Product Quality

Responsible Marketing

External
Communication

Privacy

For Our Communities

Glossary ▶

Contacts ▶

Product Quality

We produce some of the most iconic household brands from plant-based ingredients. We have set a high standard for great tasting, high quality products that we must maintain. Our consumers rely on us to deliver on taste and performance. Every time.

Our aim is to be the most trusted and preferred consumer choice on every occasion. We will never compromise on quality. No compromise on food safety, no compromise on taste and performance, no compromise on the planet.

Upfield's reputation is based on delighting our consumers with consistently great product quality. We all need to play our part to ensure that our quality standards are met. Speak to your line manager if you have any concerns about a product quality issue.

Doing the Right Thing

To always meet our consumers' expectations, we:

- **Ensure that food safety and quality are priorities** in the design and manufacture of our products.
- **Never take shortcuts** that compromise the quality or safety of our foods.
- **Comply with all regulatory** requirements.
- **Report any quality** or food safety issue immediately.



We never settle for less. Upfielders must not:

- Knowingly produce or distribute **products of a lesser quality.**
- Take decisions about quality **without sufficient knowledge or authority.**
- Directly respond to consumers about the quality or safety of products **without authorisation to do so.**



Additional Information and Resources

For more details, see our [Quality Policy](#) and [Product Development Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

Product Quality

Responsible Marketing

External
Communication

Privacy

For Our Communities

Glossary ▶

Contacts ▶

Responsible Marketing

We take responsibility for our actions — and that also applies for how we talk about what we do. Upfield is committed to developing, producing, marketing and selling all its products and services responsibly.

We are very transparent. We ensure that all communications and marketing activities are legal, fair, honest and sensitive to the views and needs of customers and consumers. Upfield marketing is ethical and not sensationalist. We tell it how it is.

Doing the Right Thing

To make sure our marketing is responsible, we:

- **Respect applicable marketing laws** always.
- **Describe Upfield products/services and their effects truthfully**, accurately and transparently, with appropriate factual and, where relevant, nutritional information.
- **Comply with our principles and standards on marketing**, including (but not limited to) those with respect to children, women and social media.
- **Are mindful of the environmental implications of marketing activity**, in such areas as new product development, marketing activation plans, packaging and content recycling.

Upfielders always:

- **Use representative, unaltered images** in marketing materials.
- **Use data or terminology** to make scientifically valid claims.
- **Avoid using offensive language**, themes, figures, or images in marketing materials.
- **Avoid advertising in any media known for promoting violence**, pornography, or insulting behaviour.



Additional Information and Resources

For more details, see our [Marketing Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

Product Quality

Responsible Marketing

**External
Communication**

Privacy

For Our Communities

Glossary ▶

Contacts ▶

External Communication

We speak to the public in a way they will understand. We don't use confusing sentences or jargon. We speak with an Upfield voice.

Our communication with investment communities such as shareholders, brokers and analysts and the media must be managed carefully. Only individuals with specific authorisation and briefing may communicate about Upfield with investment communities or the media or respond to their enquiries or questions.

Doing the Right Thing

We do not speak on behalf of Upfield without prior authorisation. That means we:

- **Consult with and get guidance from Corporate Affairs and Communications for any inquiries** from the media, analysts, NGOs, or other organisations.
- **Consult with Corporate Affairs and Communications before responding to requests** for information from government agencies and regulators, including subpoenas.



Three Things to Keep in Mind

1. If Legal advises you to respond to requests for information, **make sure that what you provide is complete, current and accurate.**
2. **These rules also apply outside formal work settings**, such as at external speaking engagements, courses, seminars, trade association events or social occasions.
3. Wherever you are, however you respond, **remember that you're representing Upfield.**



Additional Information and Resources

For more details, see our [Responsible Business Communication Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

Product Quality

Responsible Marketing

External
Communication

Privacy

For Our Communities

Glossary ▶

Contacts ▶

Privacy

Upfield respects privacy. That goes for our consumers, our colleagues and our business partners. We handle personal information with care.

We take our responsibility to collect, use and process any personal information only for legitimate business purposes. We protect it from possible loss, misuse, or disclosure.

Doing the Right Thing

We take care when collecting, using or storing personal data.

- **Collecting data:** We only collect data that is adequate, relevant and used solely for the purpose for which it is collected.
- **Storing data:** We keep personal data safe and up to date. Inaccurate data must be corrected, and records kept of any changes.
- **Using data:** We use personal data in accordance with the relevant published Privacy Notice as may be required by local law. We get the right level of consent, including where personal data is obtained from third parties.



“Personal information” is any information that could be used to identify someone, either directly or indirectly. Examples include:

- Names and initials
- Contact details, e.g. phone number, email address
- Identification numbers, e.g. employee ID, government identification number
- Financial information, e.g. credit card information, bank account details



Additional Information and Resources

For more details, see our [Privacy Policy](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

Respecting
Human Rights

Environment
Sustainability

Glossary ▶

Contacts ▶



For Our Communities

This section is about how we create a positive global impact.

In this Section:

27 Respecting Human Rights ▶

28 Environment Sustainability ▶





We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

Respecting
Human Rights

Environment
Sustainability

Glossary ▶

Contacts ▶

Respecting Human Rights

Protecting human rights is fundamental to the values that we hold at Upfield. Our business is based on trust and we are committed to earning that trust by working within the highest standards of integrity.

In accordance with the UN Guiding Principles on Business and Human Rights, we aim to protect and promote human rights in our own operations, with our varied network of partners and in the communities in which we operate.

Doing the Right Thing

It is every Upfielder's responsibility to help ensure that our work environment and practices protect and promote human rights. Any violation — or suspicion of violation — should be reported immediately. That means we:

- **Maintain a work environment based on respect for human rights, dignity and respect** — that is safe, free of harassment and discrimination, and in compliance with laws relating to working conditions and practices.
- **Do not knowingly work with anyone known or suspected to be acting in way that infringes**



Scenario Q&A

Scenario: I suspect one of our suppliers may not be paying fair wages, but they provided the most competitively priced contract. What should I do?

- **Response:** Upfield expects all our suppliers and partners to pay fair wages within their industry. Share your concerns with your manager and the procurement team and agree an appropriate course of action.

anyone's human rights, by, for example, failure to comply with wage and hours law, protect against the exploitation of children, or respect a choice to join or not join a trade union.

- **Require our partners, suppliers and third parties we work with to adopt similar standards.**



Additional Information and Resources

For more details, see our [Human Rights Statement](#) and [Business Partner Code of Conduct](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

Respecting
Human Rights

Environment
Sustainability

Glossary ▶

Contacts ▶

Environmental Sustainability

Making products that are better for the planet is central to who we are and how we operate. We know our plant-based products have lower environmental footprint than dairy equivalents. Margarine, for example, use two thirds of the land, half of the water and have a 70% lower climate impact than dairy butter.

We know it's also important to address our own environmental impacts. Whether delivering on our responsible sourcing commitments, innovating plastic free packaging solutions, driving operational efficiency, eliminating waste, or inspiring the shift to plant-based diets, we can all help create a better plant-based future.

Doing the Right Thing

Every Upfielder has a role to play to ensure that our working environment and practices are aligned with our purpose. That means we:

- **Ensure that we comply with regulations** relating to environmental protection and report environmental risks and hazards.
- **Require our partners, suppliers and third parties we work with to adopt similar standards** as laid out in our Business Partner Code of Conduct.



If in doubt, think:

- What are the environmental implications or opportunities of this action?
- How can we make what I do more efficient, less wasteful and more sustainable?
- What can I do to help inspire the shift to plant-based diets?

- **Are encouraged to maximise the positive impact we can have** through responsible growth and help reduce our own environmental footprint.
- **Challenge unsustainable activities when we see them**, including people wasting energy and resources, and support local initiatives, such as green travel.



Additional Information and Resources

For more details, see our [Environmental Policy Statement](#) and [Business Partner Code of Conduct](#).



We are Upfield

We Do the Right Thing

For Each Other

For Our Business

For Our Consumers

For Our Communities

Glossary ▶

Contacts ▶

Glossary

Anything of value: Broadly interpreted to include cash, gifts to you or your family, forgiveness of a debt, loans, personal favours, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items.

Bribe: Giving or receiving anything of value in exchange for an improper decision or action.

Competitor's confidential information: Non-public information about a competitor's product or the way in which a competitor carries out its business. Confidential information covers a broad sweep of activities, including current or future prices; pricing terms (e.g. discounts); buying prices, costs and supplier information business or financial strategies and plans (e.g. mergers, acquisitions and divestments); marketing, promotional and sales plans; financial results before any public announcement; R&D work (strategies, designs, formulae, drawings, technical information, manuals and instructions, product specifications and samples of products that have not been launched or revealed publicly); and proprietary software.

Family member: A relative, by blood or by marriage (or similar informal relationship), notably a spouse, live-in partner, parent or child. The term includes sibling, step- or adopted child, step-parent, grandparent, uncle, aunt, cousin, grandchild or any relative who has lived with you for the past 12 months or more.

Government officials: This includes all officers or employees of a government department, agency or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organisations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities or other vendors. The term also includes family members and close associates of such individuals.

Improper advantages: The offer or gift of anything of any value, including nominal cash amounts, which may be perceived as intended to cause the recipient to behave contrary to customary ethical expectations. Includes money, services (including favours), discounts, use of resources, loans, credit, the promise of future advantages (including future employment or internships) and gifts or hospitality.

Insider trading: The buying or selling of a publicly traded company's stock by someone who has non-public, material information about that company. Material information is any information that could substantially impact an investor's decision to buy or sell the stock.

Money laundering: A process where funds generated through criminal activity — such as terrorism, drug dealing, tax evasion, human trafficking and fraud — are moved through legitimate businesses in order to hide their criminal origin.

Speak Up Line: Our confidential online and telephone reporting service, administered by an external third party, through which employees and others can ask questions or raise concerns about the Code of Conduct or other ethics and compliance matters. The service is available at www.speakupfeedback.eu/web/6etraq. You can report anonymously.



Contacts

Where can I go for advice and guidance on our Code of Conduct?

Upfielders can find out more about the Code of Conduct and company policies or report an issue by turning to:

- **Managers in your business unit** are available to answer questions and are generally most familiar with company policies that apply to business activities in your business unit.
- **Human Resources** can provide guidance on employment policies, benefits, workplace issues and ethics related matters.
- **Legal and Compliance** can be reached for any inquiries or reports on the Code of Conduct. You can reach the individual members of the Legal and Compliance team directly or send an email to compliance@upfield.com.
- **Our Speak Up Line** is available [here](#) 24 hours a day, 7 days a week. It is independent, secure and confidential. It provides a channel for anonymous reporting of any potential violations of the Code of Conduct.

