



Pilgrim's Shared Services Ltd

Supplier Code of Conduct and Business Ethics

July 2022

Introduction

This Pilgrim's Shared Services Ltd Supplier Code of Conduct and Business Ethics ("Supplier Code") defines the minimum standard that we expect our suppliers ("Suppliers") to adhere to when conducting business with Pilgrim's Shared Services Ltd and its group companies.

As a Company we are committed to managing our business in accordance with our values that represent the highest standards of quality, integrity and excellence. Through this policy, we want to build meaningful relationships with Suppliers who share our vision and values and who strive to conduct business in compliance with widely recognised international ethical standards. This Supplier Code applies to the Suppliers with whom the Company does business, including their parent, subsidiary or affiliate entities and employees.

1. Employment and Human Rights

We expect all our Suppliers to have in place fair employment practices to ensure all employees are treated fairly with all Suppliers complying with all applicable local employment laws and practices to ensure their employees are supported and respected within a safe work environment where they are equally valued and rewarded fairly.

In addition to complying with all applicable local laws, as a minimum requirement, Suppliers shall comply with the Ethical Trading Initiative (ETI) Base Code (<https://www.ethicaltrade.org/eti-base-code>).

2. Equality and Diversity

The Supplier should promote and ensure a workplace free from discrimination, which means that employees should be selected on the basis of their ability to do the job and that no distinction, exclusion or preference should be made on other grounds. Discrimination in employment should not be tolerated by the Supplier and people should not be treated differently or less favourably because of characteristics not related to their merit or requirements of the job. These characteristics include but are not limited to race, colour, sex, religion, political opinion, national origin, social origin, age, disability, HIV/AIDs status, trade union membership and sexual orientation.

3. Employment Practices

Suppliers' employees must be provided with wages and benefits that, at a minimum, comply with all applicable laws and regulations. The Supplier must ensure that employees work in compliance with applicable laws and mandatory standards pertaining to work hours and conditions, including overtime, breaks, holiday and maternity and paternity leaves. The Supplier shall only hire employees and workers who are legally authorised to work, and the Supplier shall be responsible for validating employees' eligibility through appropriate documentation.

4. Freedom of Association and Collective Bargaining

The Supplier should uphold the freedom of association and the effective recognition of the right to collective bargaining or Trade Union membership in accordance with all applicable laws and regulations. Our Suppliers will support this principle and ensure that employees do not suffer any adverse consequences as a result of their participation in any related labour organisation activities.

5. Forced Labour and Slavery

The use of forced labour, slavery or servitude by any Supplier is prohibited. Forced labour includes any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced. By right, no labour should be forced or compulsory and should be freely given by employees who are free to leave in accordance with established local laws and employment practices.

6. Underage Workers

Our Suppliers must not under any circumstances employ anyone under the legal working age or utilise or benefit in any way from the use of underage workers.

7. Health and Safety

The Company expects all Suppliers to provide a safe working environment and through the use of appropriate risk assessments, policies and practices to strive to minimise the risk of work-related accidents, injuries and illnesses. As part of these procedures all Suppliers shall be prepared for emergency situations including evacuation procedures, emergency training, worker notification, first aid supplies and ensure adequate exit facilities and safety equipment.

8. Product Integrity

A Supplier's products or services must meet all quality and safety standards required by applicable laws and regulations or industry standards and should comply with all product specification and grading requirements as notified to them by the Company from time to time.

9. Animal Welfare

Suppliers must comply with all applicable animal welfare laws and regulations and ensure they have good policies and procedures in place with accurate records to demonstrate that they comply with the Company's welfare requirements and with applicable laws, regulations and codes of practice.

10. Environment

Suppliers should comply with all applicable environmental regulations and undertake initiatives to minimise their environmental footprint, promote greater environmental responsibility by optimising



resource consumption and demonstrating a continuous improvement over time. Suppliers are responsible for obtaining, documenting and reporting all required environmental permits to be able to demonstrate legal compliance.

Suppliers will have plans and processes in place to mitigate and minimize pollution to air, water and soil. Prior to discharge, waste water should be tested and treated (if necessary) to ensure that all applicable laws, standards and regulations are adhered to. Solid waste should be minimized whenever possible.

Any hazardous material, chemicals and substances use by the Supplier should be handled, moved, stored, recycled and disposed of in accordance with all applicable laws and regulations. Any restrictions on the use of any particular substances or materials or product safety requirements set out in applicable laws or set out in the Company's specifications should be adhered to at all times.

11. Business Integrity

Suppliers are expected to conduct business ethically and in accordance with all applicable laws and regulations, including compliance with trade laws where products may be sourced. Suppliers should strive to conduct business in line with the UN Sustainable Development Goals: (<https://www.un.org/sustainabledevelopment/sustainable-development-goals>).

12. Anti-corruption and bribery

The Company applies a "zero tolerance" approach to any form of bribery or corruption including tax evasion. Suppliers must comply with all applicable anti-bribery and anti-corruption laws dealing with bribery of government officials or private parties and must comply with the Company's Code of Business Conduct and Anti-Bribery Policies as communicated by the Company.

In connection with any transaction related to the Supplier's supply to the Company the Supplier must not transfer anything of value, directly or indirectly, to any government official, employee of a government-controlled company, or political party, in order to obtain any improper benefit or advantage. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of the Company, or out of funds provided by the Company and provide copies of these accounts to the Company upon request.

13. Facilitation of tax evasion

The Company also has a zero tolerance towards the criminal facilitation of tax evasion. We are committed to rejecting the facilitation of tax evasion and not engaging or recommending the services of others who do not have reasonable prevention procedures in place.

Tax evasion is the illegal non-payment or under-payment of taxes. It is usually perpetrated by not declaring or falsely declaring taxes due to the relevant tax authority. Tax evasion is a criminal offence. It can be committed by an individual, eg in relation to income tax or VAT, or by a legal entity, eg in relation to corporation tax.

Involvement in the criminal facilitation of tax evasion exposes the Company and the person facilitating the evasion to a criminal offence. It will also damage our reputation and the confidence of our customers, contractors, suppliers and business partners.



We expect all our Suppliers, contractors and other business partners to join us in our commitment not to facilitate tax evasion. Please read our Anti-Bribery and Corruption policy which outlines our prevention procedures thoroughly and give it your support.

14. Hospitality and Entertainment

Suppliers should be aware that employees of the Company are required to comply with strict requirements in relation to the giving and receiving of gifts, hospitality and entertainment and are generally not allowed to accept anything more than normal, modest business hospitality from Suppliers that is both reasonable and appropriate in a business context. The Company policies on the giving and receiving of gifts and hospitality should be observed at all times. In particular, Suppliers should not offer Company employees expensive gifts, meals or entertainment that may give the appearance of undue influence.

15. Conflicts of Interest

Suppliers should disclose to the Company all actual or potential conflicts of interest arising from either personal or business relationship with the Company or its employees. Suppliers should have no relationship, financial or otherwise, with any employee that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of the Company in the fair selection of products or appointment of Suppliers.

Suppliers should not employ or otherwise make payments to any employee of the Company during the course of any transaction between the Supplier and the Company and should take care that any personal relationship is not used to influence the employee's business judgment. If a Supplier employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or domestic partner) to an employee of the Company, or if a Supplier has any other relationship with an employee of the Company that might represent a conflict of interest, the Supplier should disclose this fact openly to the Company immediately that the Supplier becomes aware of such a conflict of interest.

16. Fair Competition

Suppliers must comply with all applicable laws and Company policies regarding antitrust, competition and fair dealing. We expect our Suppliers to conduct all dealings through honest business competition. Suppliers should never seek to gain an unfair commercial advantage or act in a manner which is unfairly prejudicial to any third party through illegal or unethical practices.

17. Business and Financial Records

Suppliers shall maintain records documenting compliance with governmental and industry regulations and shall keep accurate records of all matters related to the Supplier's business with the Company.

18. Confidential Information and Data Privacy

Suppliers should only use the Company's confidential information to facilitate the terms of their supply to the Company. Suppliers who have been given access to confidential information as part of the business relationship should keep the confidential information safe and secure and not share this information with anyone unless authorised to do so by the Company.



Suppliers shall comply with all local laws and regulations about the gathering, use, processing, storage and disposal of data received from the Company (including personal data received) and shall comply with the Company's Privacy policy requirements as communicated to the Supplier by the business. Information about how the Company uses and protects any personal data received from the Supplier can be found in the Company's privacy policies available on the Company website.

19. Reporting Concerns

Any Suppliers who believe that anyone employed by or acting on behalf of the Company has engaged in illegal or otherwise improper conduct should report the matter to the Company. We would also like you, as our Suppliers, to feel able to freely raise any issues of compliance or ethics you come across in our company and feel confident that your concerns will be taken seriously and handled appropriately without recriminations.

Concerns should be raised initially with your Company senior contacts or employee's manager. Alternatively, you can use our Ethics Hot Line at (0808 234 9445).

20. Demonstration of Compliance

Suppliers must be able to demonstrate compliance with the Code at the request and to the satisfaction of the Company.