



# Flora Food Group Code of Conduct

Our Recipe for Growth and Success

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## Flora Food Group Code of Conduct

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# We are Flora Food Group

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**A Message from David Haines, Group CEO**

# Leading the Future of Food

As a global leader in plant-based foods, our focus remains on driving the food system transition – and doing it sustainably, with purpose. This commitment is the heartbeat of our company, and we are proud to say that we have made real headway on this path.

Our success is a testament to the passion and hard work of our people, who we refer to as our Flora Foodies across the globe. With a fresh 'Always Day One' mindset built on our key values of performance, care, and passion, we deliver our business targets while never crossing the line and all while backing our people, our products, and our drive to innovate.

Our brands are hitting new milestones, and we continue expanding their footprint and connecting with consumers in new markets - all of this with the goal of making plant-based diets more accessible across the globe.

This upward journey is supported by our drive for innovation, with our world-class R&D team pushing the boundaries not just to deliver the best taste and ensure high performance of our products, but also to effectively manage our environmental impact, including by cutting down on plastic.

There is no argument that plant-based foods are part of the solution to the escalating climate crisis, and we see Flora Food as the key enabler of a positive shift in consumer preferences towards sustainable food options. We will continue to lead the



charge together with our customers and partners to create a more sustainable, health-conscious, and innovative future of food.

The Flora Food Group's Code of Conduct is tailor-made for our people. It reminds us of the guidelines and core values we must follow to ensure we all succeed as we continue with our purpose to make people healthier and happier with nutritious and delicious, natural, plant-based food that is good for you and for our planet.

This Code of Conduct establishes the shared values and policies that will guide our actions and help us prevent any unintentional, self-inflicted setbacks to our organisation.

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 us all succeed.

Many thanks to all our Flora Foodies, for pursuing our vision and purpose every day, in line with this Code of Conduct.

Warm regards,

*David J. Haines*

**David Haines**  
Group Chief Executive Officer



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# Flora Food Group's Vision, Purpose and Values

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

To lead the global food system transition whilst driving purposeful and sustainable growth across our business.

## Our Purpose

To make people healthier and happier, with nutritious and delicious, natural, plant-based food that is good for you and for our planet.



## What We Stand For

The driving force behind our success as a global leader in plant-based foods are the circa 4,800 Flora Foodies, who every day live our purpose and are engaged in our mission, delivering through our values of Performance, Care and Passion.

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 - Results Matter:** At Flora Food, it is Always Day 1. Finger on the pulse, with a relentless focus on consumers and customers. Inch by Inch. One step ahead, always data driven. Flora Foodies own it. Identify the sweet spot, confront the issue and deliver results. Agile decision makers with the courage to pivot. We fail fast and learn faster.
- **Care - Kindness Wins:** Long-term focus. We are building a more sustainable future. With the Courage To Care for each other, our communities, and our future generation. Do the right thing every day, for everyone. 'Come As You Are', we want you to be you.
- **Passion Love. Work:** We are the Future of Food. Full of energy and possibility, always raising the bar, driving Flora Food, and one another forward. Constantly curious, food lovers, enthusiasts and innovators. Our sum is greater than our parts. We love what we do.



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# 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.

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# Flora Food Group's Compliance and Integrity

Our company 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.

Our people 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 Flora Foodies, 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 our people, customers, consumers, investors, and communities and helps us win with integrity.



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# Doing the Right Thing

Whatever we do, we act with integrity. We hold ourselves and fellow Flora Foodies accountable. We call out unacceptable behaviour. We make sure everyone's actions meet the high standards we set for 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 Flora Food Group 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. (add flow chart of decision making matrix).



### 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.
- Our people 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](#).



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# How do We Uphold the Code of Conduct?

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

It is 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 Flora Food Group's reputation.
- **Immediately reporting actual or potential breaches** of the Code of Conduct through the established [Flora Food Group 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.

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 Flora Food Group policies to their team where needed, and helping resolve and escalate issues when they arise.

No adverse action will be taken against anyone employee 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 and Business Partner Code of Conduct](#).



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# Health and Safety

At Flora Food Group we uphold our core value of CARE, prioritising safety for all and ensuring a working environment is health & safe.

Ensuring health and safety is a fundamental requirement for employment with us. We all have a responsibility to contribute to the safety of our workplace. This entails only undertaking work which we are adequately trained, competent, medically fit, well-rested and sufficiently alert. We all share in the responsibility for our own occupational health and safety, as well as that of our colleagues and any third parties we work with.

## Doing the Right Thing

Flora Foodies and visitors to any of our sites must work and behave safely. That means we:

- **Adhere to Flora Food Group Health & Safety Policy, Life Saving Rules** and all health and safety standards and procedures developed.
- **Respect Flora Food Group** property and assets.
- **Demonstrate the Courage to Care and make sure that those we work with**, including contractors and visitors, are aware of and comply with our 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.
- **Never show up to work under conditions that could compromise our ability to perform jobs** effectively or create dangerous situations. This includes being under the influence of alcohol or drugs.

## Scenario Q&A

**Scenario:** You notice a smoke detector covered off at the workplace, near the kitchen, and report it to the facilities manager who has promised to follow up on it with the contractor who covered the detector during the kitchen equipment service job, to avoid a false alarm that would disrupt people's work. However, the contractor had left, and a week has since passed since your report, and the detector remains covered. What could go wrong?

- **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. The contractor violated the Life Saving Rule No.5. Tampering with critical safety equipment and controls like smoke detectors and fire alarms can lead to failure to detect a small fire on time, leading to multiple injuries and damage to property before the fire is extinguished. Never violate any Life Saving Rule as these are meant to prevent fatalities or life altering injuries should things go wrong. Speak to your line manager when you notice / before undertaking any task that is in violation of a life saving rule.

- **Report to local management any unhealthy or unsafe activity**, so that steps can be taken to correct, prevent or control those conditions immediately.
- **“See It, Say It” by reporting to local management any unsafe act or unsafe condition**, so that steps can be taken to correct, prevent or control those actions and conditions immediately.

## Additional Information and Resources

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



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# Diversity and Inclusion

We work every day to create an environment where everyone can be themselves. All employees should know and feel that they belong. Welcoming everyone to “come as they are”, is not only the right thing to do, but also is for the best for the business. We know that demographic diversity; leads to diversity of thought, and that an inclusive culture leads to a flourishing workforce.

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 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 in equality of opportunity for all employees. We work to break down barriers and drive equality. The basis for recruitment, development,

## 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](#).



training, compensation and advancement is an individual's values, attitude, approach, qualifications performance, skills, behaviours, experience and knowledge.

## **Additional Information and Resources**

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



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## 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 Flora Food Group.

We encourage everyone to take pride in their relationship with Flora Food Group, online and offline. Whether it's social platforms for business, or social media for personal activities, if you've identified yourself as a Flora Foodie, 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 Flora Food.
- **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](#).



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# Respecting the Rules

Flora Food Group 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 Flora Foods 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. from accounts abroad or from several bank accounts
- Payments made in cash

### Watch out for these phrases:

- “My sister is applying for the role... I’ll wait until she hears back before signing the contract.”
- “This month’s payment will be coming from 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.”

- Requests to make payments in a form outside the normal terms of business

### 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](#).



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# Fair Competition

Integrity is at the heart of what we do. That's why Flora Food Group believes in vigorous yet fair competition. We do not 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.

Flora Food Group 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. 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, Guideline Do's and Don'ts for Meetings with Competitors, Guideline on Sensitive Information Exchange within Flora Food Group.](#)



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# Avoiding Conflict of Interest

We act in the best interest of the company; it's ours, after all. It is up to all of us to ensure that Flora Food 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

Flora Foodies 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 Flora Food.

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 Flora Foods or other industry players.



### If in doubt, think:

- How do my activities outside of Flora Food impact my choices within the company?
- 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 Flora Food?



### Additional Information and Resources

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



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# Responsible Gifts and Hospitality

Flora Food Group 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 is 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.

Flora Food Group 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:

- A modest 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](#).



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# Cyber Security

Safeguarding our critical operations, IT systems, and information is essential for Flora Food Group success and delivering on our Purpose. Cyber security incidents can lead to disruption to our operations, financial loss, lost business opportunities, damage to our brands, reputation and products, and unhappy consumers. All Flora Foodies have a role to play in preventing this.

## Doing the Right Thing

Flora Foodies Employees must read and comply with our Information Security Policy and complete any assigned training. Security guidance and advice is regularly communicated to help Flora Foodies work in secure ways. It is important to pay attention to these messages and contact the Cyber Team with any questions. And if something goes wrong or you notice anything suspicious, let the Cyber Team know.

## 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.

Doing this protects Flora Food. Remember – nothing is too silly to ask, and nothing is too silly to report. You can contact the Cyber Team at [cyber@upfield.com](mailto:cyber@upfield.com).

## **Additional Information and Resources** .....

For more details, see our [Information Security Policy](#) and [Know and Protect Our Information: How to Guidance](#).



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# Compliance with Trade Laws

Flora Food Group 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.

## 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.



- **Seek guidance from Legal and Compliance** if we have concerns about a trade-related issue.
- **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](#), [Business Partner Code of Conduct](#).



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# For Our Consumers

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

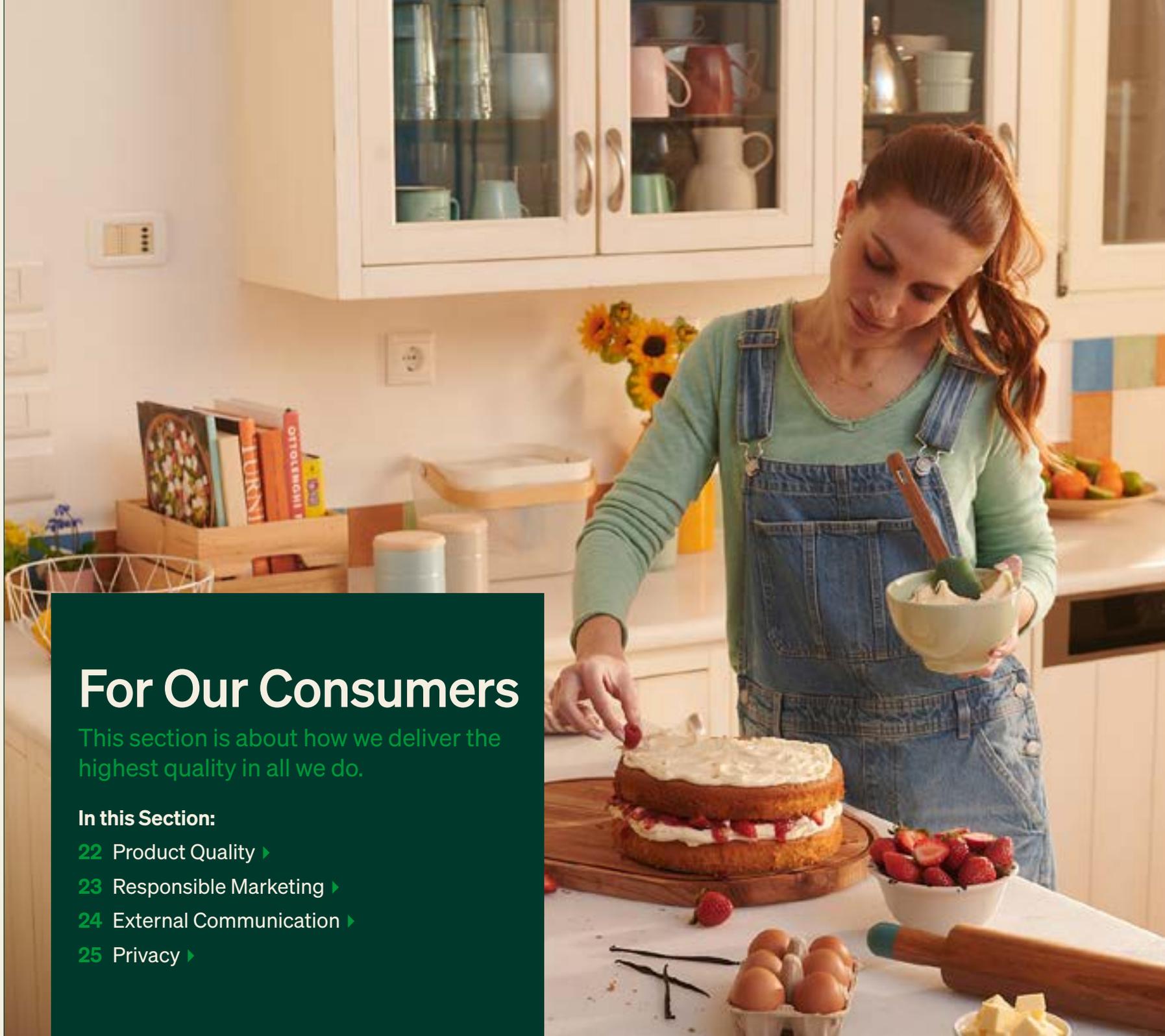
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# Product Quality

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.

Flora Foods' 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 to the quality team.



### We never settle for less. Flora Foodies must not:

- Knowingly produce or distribute **products which compromise food safety.**
- 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](#).



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# Responsible Marketing

We take responsibility for our actions — and that also applies for how we talk about what we do. Flora Food Group 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. Flora Food 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 Flora Foods' 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.

## Flora Foodies 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](#).



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# External Communication

We speak to the public in a way they will understand. We don't use confusing sentences or jargon. We speak with a 'Flora Food' 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 Flora Food Group with investment communities or the media or respond to their enquiries or questions.

## Doing the Right Thing

We do not speak on behalf of Flora Food Group 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 Flora Food.**



## Additional Information and Resources

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



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# Privacy

Flora Food Group 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](#).



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## For Our Communities

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

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# Respecting Human Rights

We recognise that respecting and promoting human rights is fundamental for a responsible global business.

For this reason, Flora Food has established a human rights due diligence process that follows a risk-based approach to identify and mitigate the salient risks in our operation and supply chain. Our approach is defined in Flora Foods' Human Rights Policy, which is aligned with international business and human rights standards.

Our business is based on trust, and we are committed to earning that trust by working closely with all our stakeholders within the highest standards of integrity

## Doing the Right Thing

It is everyone's responsibility to help ensure that our work environment and practices comply with human rights regulations and policy principles. Any violation — or suspicion of violation — should be reported immediately:

- For our operations and supply chain, we have identified the most salient Human Rights risks on which we focus our prevention measures.

## 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:** Flora Food Group requires all our suppliers and partners to pay fair wages within their industry. Share your concerns with your manager and the procurement team and agree on an appropriate course of action.

Particularly, Flora Food is focused on **maintaining a work environment based on respect for human dignity and labour** — that includes safety, freedom of harassment and discrimination, and compliance with laws relating to fair working conditions and zero-tolerance of violence and intimidation practices.

Consequently, Flora Foodies must:

- **Not knowingly work with anyone known or suspected to be acting in a way that infringes anyone's human rights** by, for example, failing to comply with wage and hours law, violating children's rights, or disrespecting workers' choice to join or not join a trade union.
- **Require our partners, suppliers and third parties we work with** to adopt international Human Rights standards, following our Human Rights Policy, Responsible Sourcing Policy, and Business Partner Code of Conduct.

## + Additional Information and Resources

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



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# 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. When compared to dairy butter, our plant-based butters and spreads have a 70% smaller carbon footprint based on CO<sub>2</sub>e<sub>q</sub> as a measure of climate change, two thirds less land occupied per year across the product life cycle, and half the amount of water consumed across the product life cycle.

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

Everyone 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

### 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?

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.
- **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](#) and [Business Partner Code of Conduct](#).



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# 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.

**Third Party:** Any external entity, with whom Flora Food Group may engage with for business purposes. This includes all vendors (direct and indirect), customers, distributors, and any other individuals, businesses or organisations.

**Speak Up Line:** Our confidential online and telephone reporting service, administered by an external third party, through which Flora Foodies 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/Getraq](http://www.speakupfeedback.eu/web/Getraq). You can report anonymously.



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

Flora Foodies 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](mailto: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.



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