



## OUR CODE OF ETHICS

Here, we believe in doing the right thing. Period. It's rooted in our standard of excellence at Primient.

With so many moving parts and competing interests in our day-to-day work, forfeiting what is right can feel like a quick solution in the moment. We may think that by making some small exceptions to the rules, we can get ahead. Unfortunately, these thoughts and actions often cause much more harm than good.

Instinctively, we know right from wrong. If you find yourself asking "Is this right?", take a step back and ask for help.

We are all accountable to our business and to each other in the work that we do. So, if you notice a team member operating in a manner that you question, speak up.

It is important that you report any unethical act and behaviors – whether intentional or not. No one will ever be retaliated against for being vocal about an expressed concern. You can talk about the situation with your manager, local HR, or legal team, or share your concern by confidentially calling our ETHICS LINE service.

This Code of Ethics is a guide to help you do business the Primient way, always. Please read this document carefully so that you fully understand what is required of all of us – as employees and business partners of Primient.

When it comes to our standard of excellence, we cannot afford to compromise.

A handwritten signature in black ink, appearing to read 'Jim Stutelberg'.

Jim Stutelberg

Chief Executive Officer



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## **INTRODUCING THE CODE**

Primient is committed to doing business the right way. To help us, we have created this Code of Ethics, a set of guidelines that define the standards of behavior we expect from everyone at Primient. In all cases, we comply with the laws of each country in which we do business.

### **Why do we need a Code of Ethics?**

Our Code helps us make the right choices. This is important because a single poor decision can have far-reaching consequences across the Company. Our Code helps insure we always do the right thing to protect our business, our reputation and, ultimately, our future. It cannot cover every situation, but rather it gives guidance. Employees can find more details on the topics covered by the Code in our policies and standards on the intranet, or you can consult the Ethics and Compliance or Legal teams.

### **Who is this Code for?**

The short answer is 'everyone who works for or with Primient' – employees, contractors, and business partners, which include suppliers, agents, distributors, contractors, consultants, and joint ventures.

### **What does it mean for me?**

Following our Code means obeying the law, acting with integrity, showing respect for each other and our business partners, building trust with all our stakeholders, and raising concerns if we believe something isn't right.

Every one of us is responsible for behaving ethically and upholding the Company's reputation – that is why it is important we are all familiar with the Code and use it every day.

## **What part do managers play?**

Behaving ethically starts at the top. Primient's managers must set a positive example, promote the Code to their teams, create an open culture that encourages people to speak up, and protect employees who raise concerns. Managers must also escalate any breaches to the Ethics and Compliance team or Legal team rather than dealing with them by themselves.

What happens if we don't comply with the Code?

Unethical behavior can have serious consequences. For the Company or its business partners it could mean costly investigations and large fines, as well as long-term reputational damage; for individuals it could mean disciplinary or even legal action.

## **HOW TO MAKE AN ETHICAL DECISION**

Sometimes situations arise where the correct course of action is not entirely clear. To help you decide what to do, think through the issues by asking yourself the questions in the order set out opposite.

Don't forget you can always discuss your dilemma with your line manager, the Ethics and Compliance team or the Legal team. See the inside back cover for contact details.

### **ASK YOURSELF -**

- **IS IT LEGAL?**
- **IS IT CONSISTENT WITH OUR VALUES AND THE CODE?**
- **WOULD I BE HAPPY TO SEE THIS IN THE MEDIA?**
- **IS IT THE RIGHT THING TO DO?**

Even if your answers to the questions above are "yes," you may still have doubts. In which case, your answer to this question should be no, until you have sought advice.

If you answered "yes" to all questions -

Go ahead – or, if you still have questions, ask.

**If you answered "no / not sure" to any question, contact the Ethics and Compliance or Legal teams before doing anything.**

## 01 ENVIRONMENT, HEALTH AND SAFETY

Protecting our people and the environment is foundational to our business. We must never, under any circumstances, compromise this commitment. Our approach to environment, health and safety is built on the idea of shared responsibility – we all have a part to play in safeguarding ourselves, our colleagues, our co-workers, and the environment.

### Guidance

Our approach to environment, health, and safety (EHS) means more than just following the rules – it means having a mindset that keeps us aware of, and allows us to eliminate or control, the risks we face every day.

Our commitment to EHS means we will not make, handle, use, transport, or dispose of any product or material unless we can do so safely and with proper regard for the impact on the environment. Doing so is a condition

of employment at Primient, so make sure you have read and understood the EHS procedures relevant to your job.

Every one of us has both the authority and the responsibility to stop any activity we believe is unsafe to people or the environment, and to report all EHS concerns, incidents, and near misses. If in doubt, please speak up.

### Have a question?

Contact your EHS manager

**Q.** I didn't have time to complete my environmental control equipment checks today. But the readings never change, so can I just use yesterday's measurements?

**A.** No – you must never record information you know to be false. An incomplete report can be addressed with your manager, but any falsification of data is explicitly against our policies and could be grounds for dismissal or even criminal prosecution.

**Q.** I work in manufacturing and I'm currently taking medicine that may causes drowsiness. How should I handle this?

**A.** Raise the issue with your doctor to see whether the medication will affect your ability to do your job. If so, then discuss with HR before reporting for work.

**Q.** I've noticed corrosion on a critical piece of equipment. If I raise my concern, it could affect our production schedule. What should I do?

**A.** Tell your manager immediately and make sure no one uses the equipment until it has been inspected. No deadline is worth the risk of using potentially unsafe equipment.

**Q.** I was on business at another company's site and felt unsafe. I didn't like to say anything at the time, but should I have done?

Your safety is essential wherever you are, and Primient will always support you if you walk away from an unsafe situation. We encourage you to raise the issue with the company concerned, but if you don't feel you can do that, then speak to your manager or our EHS person in the region.

If you have a **SERIOUS CONCERN** and don't feel you can talk to anyone in the Company, you can call **ETHICS LINE**, an independent, specialist company which provides a confidential service, 24 hours a day, in your own language. Find the number to call at the end of this Code or on the intranet.

## **02 WORKPLACE AND HUMAN RIGHTS**

We are committed to fostering a working environment characterized by trust, honesty, fair treatment, and respect for human rights. Expectations of companies like Primient are outlined in the globally recognized International Bill of Human Rights, and we follow its direction.

### **Guidance**

We expect everyone who works for or with Primient to commit to these principles.

- We treat all employees and business partners with respect. That means making decisions about hiring, pay, benefits, promotion, training, and discipline entirely on merit.
- We do not discriminate based on gender, age, disability, marital status, pregnancy, sexual orientation, religion, ethnic or national origin, genetics, military status, or any other protected class.

- We do not tolerate harassment or bullying of any kind, or retaliation against anyone raising a concern in good faith.
- We offer pay and benefits at least equal to the relevant legal minimum of the countries in which we work.
- Our working hours reflect national and local regulations.
- We do not use child or forced labor, and we respect employees' rights of freedom of association, for example being members of a union or works council, and do not discriminate against those exercising their rights of association.

If we find any breaches of these principles, we will act.

### **Have a question?**

Contact your HR manager regarding employment issues, the Procurement department for questions or concerns about suppliers, or the Ethics and Compliance or Legal teams.

**Q.** One of our suppliers may be employing children, but their contract won't be reviewed until next year. What should I do?

**A.** Report this to your manager or the Ethics and Compliance team who will decide on the appropriate steps.

**Q.** A male colleague is clearly upset by other men on our team telling jokes of a sexual nature. They don't bother me, but should I say something anyway?

**A.** Jokes of a sexual nature may cause both male and female employees to feel harassed. Encourage your colleague to speak up, but if he doesn't want to, talk to your manager or HR.

**Q.** My manager is very hostile. My colleagues and I all feel bullied but aren't sure what to do. You should speak up. We do not tolerate bullying and expect all managers to treat employees with respect. If necessary, speak directly to HR, the Ethics and Compliance team or call Ethics Line.

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### 03 FINANCIAL INTEGRITY

All of us play a part in guarding against fraud and ensuring everything we report is accurate. We also need to make sure we abide by the law.

#### Guidance

##### Accuracy of financial information

Internally, we rely on the accuracy of information reported within the business – it's the basis on which our senior managers and the Board make decisions. Externally, our business partners and investors rely on our reporting and our business records to be accurate and complete.

When it comes to reporting externally, clearly, we do not need to disclose everything, because many aspects of our business are commercially sensitive. But in what we do report we must be open and honest about our business and performance – good and bad. Our internal information is the basis of what we report externally, so, for our external reporting to be accurate, our internal information must be too.

Every aspect of our business makes its way into financial information – whether it's costs, savings, investments, revenue – so in what we do each day we are all in some way contributing to the process of recording it.

This means:

- Ensuring all transactions are properly authorized, recorded and reported as required
- Following all Company policies and procedures at all times which will insure we always comply with internal controls.

**Q.** I suspect that a colleague is misusing their Travel & Expenses card to buy meals for themselves unconnected to travel or business commitments. Should I be worried about this?

**A.** Yes, you should inform both your line manager and the VP, of Audit. Do not, under any circumstances, try to investigate this yourself.



**Q.** It is not public knowledge yet, but I know that now would be a good time to buy our partner's shares because we're about to announce a new partnership that is likely to make the share price go up. Can I tell my family and friends?

**A.** No, that's considered insider dealing, and is illegal.

All of us play a part in guarding against fraud and ensuring everything we report is accurate. We also need to make sure we abide by the law.

### **Protecting against fraud**

Fraud can happen in several ways: theft, giving false information for personal gain, failure to disclose required information, the distortion, suppression, or falsification of records or using your position to influence others to do any of these things on your behalf. At an individual level, fraud can include theft through false expense claims or other means, for example overstating hours worked, or stealing company property. It's essential that we all guard against fraud, whatever form it takes.

If you suspect fraud, you must not investigate it yourself, but instead report it immediately to the VP, Group Audit and Assurance or to Ethics Line which will insure it is investigated in the proper way.

### **Money laundering and tax evasion**

Like every other law, we must comply with anti-money laundering laws. This means we will do business with reputable customers involved in legitimate business activities and will only accept funds from legitimate sources. We will also not do business in a way that helps customers, suppliers or other third parties evade tax.

### **Have a question?**

Contact the Ethics and Compliance team, Group Financial Controls team or the Audit group.

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## 04 BRIBERY

We are proud of our reputation as a trusted business that operates ethically and transparently. Consequently, we do not tolerate any form of bribery or corruption by employees or business partners. We never offer, give, or accept bribes to gain a business advantage.

### Guidance

Bribery can take many forms – it isn't simply cash in exchange for business. Bribes can take the form of gifts, travel, entertainment, offers of jobs or internships, charitable donations, or anything else that has value to the recipient. As well as new contracts, bribes can include offers to speed up approval processes, to obtain licenses or permits, or to reduce tax or other liabilities.

As a company, we undertake due diligence on our business partners to make sure they uphold our stance against bribery. We also record all transactions accurately to avoid inadvertently facilitating bribery.

Always report any offer or request you feel uncomfortable with to our Ethics and Compliance or Legal teams. Similarly, always report any suspected bribery by a third party, whether Primient is involved.

### Have a question?

Contact the Ethics and Compliance or Legal teams.

**Q.** A customs broker says he can speed up processing times for our goods if we pay a special handling fee. Is this, OK?

**A.** Not without a thorough investigation. Any request for extra fees must be reviewed and pre-approved in writing by our Ethics and Compliance or Legal teams.

**Q.** A customer's sales director sits on the board of a local charity and has asked for a contribution as part of the negotiations for our new contract. Can I make the donation?

**A.** No. Either politely decline or pass the request to the Ethics and Compliance or Legal teams.

**Q.** We have been told that a particular local sales agent is- the key to winning business in a new market. Can we appoint them?

**A.** Possibly, but only after you have contacted our Ethics and- Compliance or Legal teams to ensure the proper steps are taken.

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## **05 GIFTS AND HOSPITALITY**

Giving or receiving meals, gifts, hospitality, travel, and other items of value can be part of building a good business relationship. That said, the wrong sort of gifts and hospitality could look like an attempt to influence someone's decision-making, even if the intention is completely innocent.

### **Guidance**

To address this, we all need to use when deciding what is and isn't make sure all gifts have a business purpose and do not violate local laws or the ethical policies of the other party.

Also, be aware that some situations or relationships are riskier than others. For example, it is particularly important that you always seek Compliance or Legal teams before government official. You should also seek guidance if you work in procurement and are responsible for selecting vendors and suppliers.

### **Have a question?**

Contact the Ethics and Compliance or Legal teams.

**Q.** In recognition of our good working relationship, I'd like to offer a customer ticket to a sporting event I'm attending. Is this, OK?

**A.** This is probably fine. But do consider the circumstances – the timing of the invitation and the value of the tickets relative to the commercial relationship. For example, are you currently negotiating new contracts with the customer? If so, this could be seen as an improper inducement. For more information, see our Gifts and Hospitality policy or consult with the Ethics and Compliance or Legal teams.

**Q.** A potential new vendor has sent me a bottle of champagne as a holiday gift. However, we are still in the bid process. I've checked, and the value of the champagne is \$50. Can I accept it?

**A.** If you weren't in a bid process this would probably be fine, but because of the timing, it could look compromising, so you should politely decline the gift and return it. Contact the Ethics and Compliance or Legal teams.

**Q.** As an employee, you must review the specific thresholds and reporting, and approval requirements related to your area in our Gifts and Hospitality policy before offering or receiving a gift or hospitality. You can find this policy on our intranet or ask the Ethics and Compliance team to send you a copy.

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## 06 TRADE COMPLIANCE

As a global company, it is essential that we comply with international trade regulations. Our ability to import and export products around the world is a privilege, not a right. So we are committed to complying with the laws and regulations in all the countries where we operate.

### Guidance

Anyone who works for or with Primient must stay alert and informed when involved in cross-border transactions.

That means:

- Arranging all relevant import and export licenses, permits and certificates. Every cross-border shipment must have the correct import and export classification and valuation, and list the country of origin.
- Knowing where Primient is authorized to operate. Trade sanctions can prohibit us from doing business with certain countries, entities, and individuals.

- Knowing who you are working with and where. Only use approved customs brokers and freight forwarders. Make sure they meet our due diligence requirements.
- Reviewing all third-party documents and reporting requests to boycott entities based on gender, ethnicity, location, or national origin to our Ethics and Compliance team.
- Looking for warning signs that could put Primient at risk of cross-border shipments to or through a prohibited territory or to a prohibited end-user. For example, a goods order unrelated to a purchaser's line of business or a freight forwarder being listed as a final

### **Have a question?**

Contact the Ethics and Compliance team.

**Q.** Our facility uses a customs broker to file import and export declarations and maintain necessary records. Is this acceptable?

**A.** It is common to use customs brokers for imports and exports and they can house records. However, in most jurisdictions, importers and exporters – ie Primient in our case – are accountable for recordkeeping. So, as well as your customer broker housing records, you must also maintain them in line with local regulations and our own guidance.

**Q.** Our customs broker is telling us to use a certain tariff classification for an import. Should I agree?

**A.** No. Customs brokers often aren't familiar enough with our products and processes to decide such important details. What's more, Primient is liable to Customs for providing accurate information, so we must give our customs brokers the proper tariff classification, country of origin and value ourselves. For more help, please contact the Legal Team.

**Q.** I received an order from a customer in the Middle East, and their Letter of Credit requirements from their bank stipulate that we must not ship on an Israeli-flagged vessel. What should I do?

**A.** You must report this to the Ethics and Compliance team who will

review the request and determine next steps. Boycotts based on national origin, religion, ethnicity, or gender.

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## 07 CONFLICTS OF INTEREST

A conflict of interest typically occurs when the actions or business interests of an employee or close family member or friend, somehow clashes with the business interests of Primient. Where competing interests conflict, we may find it difficult to make objective or unbiased decisions. The result can cast doubt on our decision-making or even call into question our personal and professional integrity.

### Guidance

Avoiding a conflict of interest is simple: if you suspect a situation may lead to a conflict of interest, speak to your line manager, the Ethics and Compliance team or the Legal team. By getting everything out in the open, you remove any suspicion of impropriety, something that is in everyone's interests. Even the appearance of a conflict of interest may make others think we are acting improperly.

Having disclosed a conflict, you will need to excuse yourself from any decisions until the conflict has been resolved. In some cases, you may need to withdraw completely from the situation.

### Have a question?

Contact the Ethics and Compliance or Legal teams.

**Q.** My facility is looking for a new supplier. My cousin owns a business that provides exactly what we need. Can I recommend him?

**A.** Yes, but it's essential you disclose the relationship. If you personally are responsible for finding the supplier, you must either exclude your cousin or, if you

truly believe that he would be the best choice, raise the issue with your line manager then remove yourself from the decision-making process.

**Q.** My husband works for a competitor. We don't discuss work at home, and I don't feel that Primient has any right to know about my husband's career. However, some of my colleagues have said that I'm in a compromising situation. What should I do?

**A.** To protect both yourself and the Company, you should disclose all the facts to your HR manager. Also, you and your husband should make sure that confidential information belonging to either company is properly protected at home.

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## 08 COMPANY RESOURCES

Primient employees are all responsible for protecting

Company property and resources from damage, theft

or misuse. Similarly, it is essential we all use Company equipment and communication systems responsibly, and in a way that does not reflect badly on Primient.

### Guidance

In the course of our work, we are often entrusted with Primient resources ranging from intellectual property to equipment, Company money, facilities, and information. And don't forget that our own time at work is also a Company resource.

It is important we always use Company property and resources in a way that is reasonable, responsible, and respectful. We must never use Company resources in a way that is unlawful, unethical, or contrary to Company policy. We may use

Company equipment for personal reasons occasionally, if it does not reduce the value of Primient's assets, incur additional costs, place Company information at risk, interfere with productivity or place Primient at risk of liability.

And, if we are entrusted with resources and property belonging to other organizations, we should be just as responsible and respectful as we are with Primient's.

### **Have a question?**

Contact your HR manager, the Ethics and Compliance or Legal teams.

**Q.** One of my colleagues seems to be running an outside consulting business during Company time and using his Primient laptop to do so. Should I say something?

**A.** Yes. If you have suspicions about a colleague misusing Company time and assets you must raise them to HR, the Ethics and Compliance team or through Ethics Line.

**Q.** My printer at home is broken. Can I print out my child's school report on the printer at work?

**A.** Yes. It's fine to use a work printer for occasional personal use so long as it doesn't interfere with your job.

**Q.** I want to download a film at home in the evening – can I use my Company laptop?

**A.** Although you're at home, by using your Primient laptop, you're effectively 'inside the Company', so it depends on what you're watching. Remember that pirated content is illegal, and some content may be considered offensive, whether it is legal.


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## **09 CONFIDENTIALITY AND PRIVACY**

In business, as in life, a reputation for honesty, reliability and discretion is hard to win but easy to lose. That's why as a company we are committed to protecting the confidentiality and privacy of both our own information, and that of other





organizations we work with. We comply with all applicable laws and regulations protecting confidential information, including laws on the protection of personal data and the protection of the right to privacy.

## **Guidance**

‘Confidential information’ is a broad term

that includes information about Company plans and strategy, employees, customers, suppliers and even competitors. Some examples include personal data, customer information, marketing or sales forecasts, supplier identification, recipes, business results and information about potential mergers or acquisitions.

It is important we only share such information with colleagues who have a legitimate need to know. We must never share confidential information with anyone outside Primient unless we have taken the necessary steps to protect it. This may include ensuring the other person has signed a non-disclosure agreement or obtaining consent of the owner of the confidential information.

Make sure you do not leave confidential information in places where others may find it and avoid discussing or working with confidential information in a public area where a conversation may be overheard, or the data accidentally disclosed. Take particular care while travelling on business to safeguard your laptop and phone.

## **Have a question?**

Contact the Ethics and Compliance or Legal teams.

**Q.** I recently joined Primient from a competitor who is successful in a market we are looking to enter. I have a copy of my former employer’s business plan. Can I use this information in my new position?

**A.** Not. All Primient employees are prohibited from using confidential information from their previous employers. Please contact the Ethics and Compliance or Legal teams to let them know you have this information.

**Q.** I recently met a distributor for lunch at a busy restaurant. He started talking loudly and in detail about our business. This made me uncomfortable – what should I have done?

**A.** The right thing to do would be to stop the conversation, saying politely that it would be better to have this kind of conversation in a more private place. We

should always be aware of our surroundings when discussing Primient business in public.

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## 10 FOOD SAFETY AND QUALITY

Our reputation is built on delivering consistently high-quality ingredients and solutions to our customers around the world. All of us, whatever our roles, have a responsibility to do what we can to ensure that everything we produce meets regulations and our customers' expectations, and is of the highest possible quality.

### Guidance

At a minimum, we must make sure us

operations comply with all relevant laws and regulations. Our ingredients must comply both with the regulations of the country in which we manufacture them, and with those of the country in which they are sold. Similarly, it is essential that we are aware of, and satisfy, all applicable food safety standards.

We also aim to develop a deep understanding of our customers' needs and expectations, and we manage these with clear and open communication.

We react to customer concerns in a timely and effective way, dealing with any issues quickly and politely.

We also take the time to build solid relationships with suppliers and other business partners to ensure their products and services meet our standards.

### Have a question?

Contact the Procurement, Quality, Ethics and Compliance or Legal teams.

**Q.** We have found a new supplier who could save us a lot of money, but we know that they've had recalls and problems with quality in the past. Should we appoint them?

**A.** Saving money should never be at the expense of quality or food safety, so you should pause negotiations and discuss the situation with the Procurement and Quality teams who will help decide the best course of action.

**Q.** While walking through the feed plant, I saw some mice. Is this a problem? After all, products from the feed plant only go into animal feed.

**A.** Yes, it is – we must have proper pest control throughout all parts of the plant. Also, having mice in the feed area means we are more likely to have them in the areas where we make products for human consumption. You should report it to your line manager.

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## 11 COMPETITION

We are committed to free competition based purely on the merits of our products and services. We abide by all relevant anti-trust and competition laws in the countries in which we operate. We never engage in any kind of understanding with competitors on pricing, market allocation or anything else that could restrict competition and/or distort the market.

### Guidance

Violating competition or anti-trust laws can lead to significant fines – and even imprisonment. As a result, it is essential we never propose or engage in any formal or informal agreements, understandings, meetings, discussions, communication or information exchanges with competitors or potential competitors regarding competitively sensitive issues.

Always treat customers in a straightforward manner that respects their independence. Never discuss or agree any aspects of pricing, territories, markets, contracts, production, customers, inventory, costs, or capacity with competitors. Never enter into agreements with suppliers or customers that could restrict competition. Never interfere with our distributors' freedom to set their resale prices.

If a competitor tries to discuss any of these topics with you, or if you receive any of the above information even inadvertently, contact our Legal or Ethics and Compliance teams.

### **Have a question?**

Contact the Legal or Ethics and Compliance teams.

**Q.** I received a competitor's price list from one of our distributors. Can I use it?

**A.** No. Once you realize what the information is, you should stop reading immediately and contact our Legal or Ethics and Compliance teams.

**Q.** A representative from a competitor began discussing their pricing strategy at a trade association meeting. I told them I thought it was inappropriate and left the meeting. Did I do the right thing?

**A.** Yes. By doing so, you reduced any suspicion that you were trying to fix prices. You should also report the incident to our Legal or Ethics and Compliance teams, and not share the information with anyone else.

**Q.** I'm in Procurement and one of our suppliers is also a competitor in another part of the business. A colleague in Sales asked me how much we're paying this supplier for a particular product. Can I tell him?


**A.** No. We must protect any pricing information we receive from our competitors when they are suppliers. Explain to your colleague that this is unacceptable, period. You should also report the incident to the Legal or Ethics and Compliance teams.

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## **12 COMMUNITY INVOLVEMENT**

Primient is also about supporting the communities where our employees live and work. Building stronger and healthier communities is not only the right thing for us



to do, it also positively contributes to the long-term sustainability and reputation of our business.

## **Guidance**

Primient encourages its employees to become actively involved in their communities by volunteering and participating in local projects and charitable activities. However, you need to make sure that outside activities do not interfere with the performance of your job or create a conflict of interest.

All Company charitable contributions need to comply with applicable laws, as well as being in line with our policy on corporate giving. You should seek approval before donating Company funds or making contributions in Primient's name.

## **Have a question?**

Contact the Global Community Relations, Ethics and Compliance or Legal teams.

**Q.** A charity I support is asking local businesses for help. Is this something I can ask my team or Primient to support?

**A.** You should consult our policy on corporate giving which outlines our approach to community involvement and charitable support (donations and services), and the approval process. For example, before we provide support to a new charity, we need to verify it is a duly registered charity and properly managed.

**Q.** I regularly volunteer at a local food bank. Given Primient supports several organizations related to food and nutrition, can I tell the food bank that my service is being provided on behalf of Primient?

**A.** We are proud of the contribution our employees make to their local communities and encourage their involvement in initiatives to help improve people's lives. However, you must seek permission before presenting yourself as a Company representative. The process to do this is set out in our policy on corporate giving.

If you have a **SERIOUS CONCERN** and don't feel you can talk to anyone in the Company, you can call **ETHICS LINE**, an independent, specialist company which provides a confidential service, 24 hours a day, in your own language.

Find the number to call at the end of this Code or on the intranet.

### 13 POLITICAL INVOLVEMENT AND CONTRIBUTIONS

Primient is a global company with a role in many different societies around the world. This brings us into contact with politicians with whom we engage in debates on subjects of legitimate concern to our business, our employees, and the communities in which we operate.

#### Guidance

We support people's right to take part in political activities, provided their involvement does not conflict with their duties at Primient.

It is particularly important that any political involvement on your part does not suggest Primient's involvement or approval. You must therefore inform your line manager and the Ethics and Compliance or Legal teams in advance if you plan to seek or accept any kind of public office. Also, you must not make political contributions on behalf of the Company or use Company resources to engage in lobbying or other political activity.

Like many companies, we use lobbying – which includes hiring consultants who interact with regulatory or other government agencies or officials on our behalf – to make our case on issues that concern our business. However, this corporate political activity is highly regulated, and we make sure it is only carried out by employees authorized to act on our behalf, in strict compliance with Company policy. Never hire a government official or lobbyist to perform services for Primient unless you have specific written authorization from our Ethics and Compliance or Legal teams.

#### Have a question?

Contact the Ethics and Compliance or Legal teams.

**Q.** I'm volunteering for a local political campaign and want to print campaign materials at work. Is that, OK?

**A.** No. Never use Company resources for outside political activity.

**Q.** A business contact suggested I meet an influential local official who can help with Primient's business strategy. Should I go?

**A.** First, speak to our Ethics and Compliance or Legal teams. It's important that all business meetings with government officials are discussed and agreed internally in advance.

If you have a **SERIOUS CONCERN** and don't feel you can talk to anyone in the Company, you can call **ETHICS LINE**, an independent, specialist company which provides a confidential service, 24 hours a day, in your own language.

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## **IF IN DOUBT – CONTACT PRIMIENT'S ETHICS LINE**

Everyone has a responsibility to raise concerns about breaches – or potential breaches – of our Code, and no one who raises a concern in good faith will suffer. Ideally, you should speak first to your line manager, a senior manager, or a member of the Ethics and Compliance or Legal teams.

For whatever reason, you may find this too difficult, or you may want to speak to someone outside Primient. Therefore, we have engaged Lighthouse, an external, independent company which provides a confidential service, available 24 hours a day.

Lighthouse is staffed by professional investigators who speak a wide range of languages. The investigators will listen to your concern in your language and make sure it is dealt with appropriately by reporting your concern straight to our Ethics and Compliance team, while protecting your anonymity.

- **Website:** [www.lighthouse-services.com/primient](http://www.lighthouse-services.com/primient)
- **Toll-Free Telephone:**
  - Direct Dial - NOAM
  - USA and Canada: 833-214-2479 (English)
  - USA and Canada: 800-216-1288 (Spanish)
  - Canada: 855-725-0002 (French)
  - Mexico: 01-800-681-5340 (Spanish)

Outside NOAM: Access Code Required (LATAM and Europe)

<u>Country</u>	<u>Access Code</u>	<u>Country Code*</u>	<u>Number</u>
Argentina	0-800-222-1288	54	800-603-2869
Brazil	0-800-890-0288	55	800-603-2869
Poland	0-0-800-111-1111	48	800-603-2869

\*If needed

## CONTACTS

If you have any questions or concerns about the topics covered in this Code, please email us in the first instance, via our dedicated ethics and compliance inbox – [ethicsandcompliance@primient.com](mailto:ethicsandcompliance@primient.com).

Alternatively, you can also contact a member of the Ethics and Compliance or Legal Teams.