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# Oscar Mayer Code of Business Conduct and Ethics

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## Introduction from our CEO

At Oscar Mayer we are committed to conducting our business with the highest level of honesty and integrity. This Code of Business Conduct and Ethics sets out the fundamental principles we rely on at Oscar Mayer to carry out our day-to-day work.

The Code considers all relevant laws and other regulatory requirements but more importantly, it sets out the moral and ethical rules that apply to everyone who works for and with Oscar Mayer.

The Code addresses many of the situations that you will encounter when doing your job. However, it may not address every situation or answer every question you might have. This should not stop you asking the question. If you are ever unsure as to what course of action you should take or believe there might be some conflict between legal requirements and the Code, please consult your Line Manager, your People Team, Group Head of People Services and/or the Chief People & ESG Officer.

## Expectations – Who the code applies to

The Oscar Mayer Code of Business Conduct and Ethics (this “Code”) underlines our basic values and is intended to help us understand how to make proper and ethical day-to-day business decisions.

Oscar Mayer is committed to conducting business in a manner that follows the highest ethical standards and complies with all applicable laws. For the purpose of this Code “employees” should be deemed to include all Directors, Managers, Supervisors and employees of Oscar Mayer. This Code applies equally to all Oscar Mayer employees who work for and on behalf of Oscar Mayer.

We will only work with business partners that share our commitment to working with integrity. Anyone that fails to meet the expected standards outlined in our Code may be subject to disciplinary action.

### **You are responsible for following the Code of Conduct.**

The Code includes:

- Informing you of the cultural and behavioural expectations for engaging in proper and ethical business conduct.
- Providing guidance for relevant regulations, laws and policies affecting your day-to-day activities, including guidance on making

political and charitable contributions, and guidance on what actions you should take when faced with blackmail or extortion.

- Facilitating a process for addressing issues and questions involving appropriate business conduct.
- Identifying a confidential means for you to report suspected violations of this Code.

## Key cultural expectations the Oscar Mayer Code will facilitate.

- Compliance with all applicable regulations, laws and policies governing our business conduct.
- Being honest, fair, and trustworthy in conducting all Oscar Mayer activities.
- Being aware of and avoiding conflicts of interest between work and personal affairs.
- Sustaining an atmosphere of fair employment practices extending to every member of the workforce.
- Helping to ensure a safe workplace and protection of the environment.
- Nurturing a culture where ethical conduct is recognised, valued, and exemplified by all employees.

In today's business environment, the legal requirements affecting Oscar Mayer's operations can be complex and sometimes confusing. Oscar Mayer also knows that things change. As a result, every ethical and legal issue simply cannot be anticipated and this Code cannot provide all the answers, nor can it replace the honest and ethical behaviour of all its employees. It must operate as a guide to help you resolve ethical and legal questions.

It is your responsibility to use this Code and your common sense when there are questions regarding your behaviour or that of other Oscar Mayer employees and people with whom we do business.

When all else fails, ask for assistance when answering such questions.

## Our Values

	<b>Passion</b>	We pour our hearts into our work, making our business vibrant and inspiring.
	<b>Fun</b>	We make work enjoyable, fuelling creativity and happiness for all.
	<b>Accountability</b>	We own our actions, ensuring things get done right, every time.
	<b>Communication</b>	We connect, collaborate, and innovate together to drive our business forward.
	<b>Integrity</b>	We're unwavering in doing what's right, building trust among our team and customers.

## Compliance with Laws

Oscar Mayer's business activities shall be conducted in compliance with all applicable laws and regulations. In all situations, including those where there are no applicable legal principles or where there are unclear or conflicting laws, our business must be conducted in such a manner to not pose a risk to Oscar Mayer or create any reputational damage (in the opinion of Oscar Mayer), today or in the future.

In general, ignorance of the law is not a defence. Accordingly, you must be aware of laws governing us and must ensure your conduct is in compliance with all such laws. However, the following will provide information on some of the types of laws and policies that must be observed.

## Conflicts of Interest

Oscar Mayer recognises, that you may take part in legitimate financial, business, and other activities outside of your job. However, those activities must always be lawful and free of conflicts with respect to your responsibilities as an Oscar Mayer employee.

You must never misuse Oscar Mayer resources, influence and assets or otherwise discredit Oscar Mayer's good name and reputation.



A “conflict of interest” occurs when your personal, financial, or private interest interferes in any way – or even appears to interfere – with your responsibilities to Oscar Mayer and with the interests of Oscar Mayer.

It is impossible to list all of the potential conflict of interest situations that might arise. You are expected to check with your Manager or people team if unsure of how to avoid not only actual conflicts of interest, but also the appearance of conflicts of interest.

Some useful guidelines are:

### Avoiding Conflict

- Disclose to your immediate Supervisor or Manager any outside activities, financial interests or relationships that may present a conflict of interest or even appearance of a conflict.
- Exercise good judgment in all personal and business dealings.
- Never misuse Oscar Mayer resources or assets by using them for anything other than a legitimate Oscar Mayer business purpose.
- Obtain approval from your People team before accepting any position as an officer, director, consultant or employee of any outside business concern or activity. Such approval must be in writing and will be placed on the employee's personnel file.
- Never engage in any activities that might directly or indirectly compete with Oscar Mayer.

### Signs of possible Conflicts of Interest

- Holding a financial interest in a company that does business with or that could otherwise affect Oscar Mayer's business.
- Taking a job that may interfere with your job at Oscar Mayer or tempt you to use Oscar Mayer's working hours or equipment for activities other than your role at Oscar Mayer.
- Misusing Oscar Mayer resources or influence to promote or assist an outside business.
- Conducting business with, or employing, a spouse, relative, or close personal friend.

It may not always be clear when you have a conflict of interest. For example, a conflict of interest may arise if you or a member of your household has any association with or ownership interest in a competitor, customer, provider, supplier, or any company that does business with Oscar Mayer. Your Line Manager or People Team can help if you have questions. You should report any actual or potential conflicts to your Line Manager or People Team.

As employees, there is a duty to remain free of conflicts of interest, and this is a continuing obligation that requires you to act in accordance with

the highest standards of fairness, integrity, and equity towards Oscar Mayer.

## Anti-Corruption and Bribery, including Gifts and Entertainment

### Bribery

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage (financial or otherwise) as an inducement for an action which is illegal or a breach of trust.

Like all businesses, Oscar Mayer is subject to many laws that prohibit bribery in virtually every kind of commercial setting. Oscar Mayer has a zero-tolerance stance on bribery, under no circumstances should you bribe, or willing be bribed by or for anyone.

Oscar Mayer has a “zero-tolerance” approach to all forms of bribery and corruption within its business. You should also be careful when you give or receive gifts and pay for entertainment on behalf of Oscar Mayer.

We want to avoid the possibility that the gift, entertainment or other business courtesy could be perceived as a bribe or as intended to influence a business transaction with another party, regardless of whether Oscar Mayer is the supplier or the purchaser.

## Gifts and Entertainment

Reasonable and proportionate hospitality or promotional expenditure, which seeks to improve the image of Oscar Mayer, better present Oscar Mayer's products and services or establish cordial relations, is recognised as an established and important part of business.

You should never accept gifts or entertainment from a customer, supplier or anyone attempting to do business with Oscar Mayer unless they are unsolicited, and they do not create any obligation on your part.

Accepting any gift or entertainment that is more than a routine social event can appear to be an attempt to improperly influence your decisions with respect to customers, suppliers, consultants or the like.

You should observe the following standards when deciding whether or not to accept gifts, entertainment or travel and lodging.

## Accepting Gifts

You may not accept gifts such as merchandise or products, theatre tickets, tickets to sporting events, and personal services or favours.

## Being Entertained

Customary business entertainment such as lunch, dinner, theatre, a sporting event, and the like, is appropriate if of a reasonable nature. Prior

written authorisation from an Exec member with justification of reason and pre-set spend limit is required in line with the company's Travel and Expense Policy.

## Accepting Travel and Lodging

You may not accept payment for, or gift of, free transportation, lodging or other travel expenses unless you are traveling as part of a group hosted by a customer, supplier or their representatives, the trip is business-related, and the gift or payment is reported and approved in advance by a member of the Exec in line with the company's Travel and Expense Policy.

## Giving Gifts

Don't give gifts to a customer, supplier, or any other person in the course of facilitating business if you know or suspect the recipient is prohibited from accepting them. If you aren't sure whether there is a prohibition, you must ask.

## Entertaining Customers and Suppliers

Don't entertain any customer, supplier, or any other person in the course of facilitating business if you know or suspect the person being entertained is prohibited from accepting it. If you aren't sure whether there is a prohibition, you must ask.

Prior written authorisation from an Exec member with justification of reason and pre-set spend limit is required.

## Protecting Oscar Mayer Assets

Oscar Mayer has a responsibility to properly use and protect their assets. Assets can be both tangible (such as buildings, furniture, computer systems and equipment, inventory, tools, and funds) as well as intangible (such as trade secrets, work time, marketing and pricing strategies).

All electronic information transmitted or contained in Oscar Mayer's information systems is the property of Oscar Mayer and should be properly safeguarded and used only for job-related purposes.

## Personal Use of Oscar Mayer Assets

You are expected to ask for guidance when unsure when using Oscar Mayer assets to perform routine personal tasks during non-work time such as sending personal e-mails and briefly accessing legitimate commercial websites. Access to e-mail and the Internet may be monitored in accordance with the law (i.e. email filtering software and internet categorisation) and there is no assurance of privacy. At some points a more detail search may be required (HR and/or police investigation), if this is the case this will be clearly communicated to those involved. Visiting websites that contain racist, pornographic, gambling, or other inappropriate materials is prohibited. For more detailed information, please refer to the IT Acceptable Usage Policy.

Other specific examples of inappropriate use of Oscar Mayer assets are the personal use of company vehicles for non-business reasons (unless otherwise specified in your contract of employment); company tools or equipment; company paid mail and company supplies.

### Our Employees

Oscar Mayer strives for a workplace that is inclusive and safe for our employees. Our policies are designed to promote fairness and respect for all individuals, and to foster a workplace where diversity and inclusion are valued. Oscar Mayer does not tolerate discrimination, harassment, or retaliation. Behaviours that put our employees at risk are not allowed in relation to all of Oscar Mayer's policy and relevant legislation.

### Equal employment opportunity

Oscar Mayer is proud to be an Equal Opportunity employer. It is Oscar Mayer's goal to have a work force that reasonably reflects the diversity of qualified talent that is available in the local labour markets. Oscar Mayer seeks to recruit, develop, and retain the most talented people from a diverse candidate pool or to develop those who have proven excellent employment or agency experience within the company.

Oscar Mayer bases employment decisions, including selection, development, and compensation decisions, on an individual's



qualifications, skills, and performance. It does not base these decisions on personal characteristics or status, such as race, colour, sex, pregnancy, national origin, religion, age, disability, sexual orientation, gender identity or marital status.

Oscar Mayer is fully committed to equal employment opportunity and compliance with the letter and spirit of the full range of fair employment practices and non-discrimination laws.

## Harassment Free Workplace

Oscar Mayer strives to have a workplace that is free from harassment. Oscar Mayer does not tolerate inappropriate behaviour or harassment by, or of, our employees. For a more detailed breakdown refer to Oscar Mayer Bullying Harassment Sexual Harassment policy.

Harassment is any behaviour that:

- Unreasonably interferes with a person's job performance, or
- Creates a workplace that is intimidating, hostile, abusive, or offensive
- Is related to age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

Any harassment is unacceptable even if it does not fall within any of the above categories

Bullying is any behaviour that:

- Regarded as offensive, intimidating, malicious or insulting.
- Abuses a misuse of power to make an individual feel vulnerable, upset, humiliated, undermined or threatened.

Sexual Harassment is any behaviour that:

- Is unwanted, related to a conduct of sexual nature (not just to gender), and made with purpose.
- Effects an individuals dignity or creates a intimidating, hostile, degrading, humiliating, or offensive environment

Our employees must:

- Treat everyone with respect.
- Refrain from unwelcome or potentially offensive verbal or physical behaviour, including slurs, name calling, unethical jokes, horse play, inappropriate touching and other potentially harassing or intimidating actions.
- Must display and adhere to our company values.

Our managers must:

- Administer Oscar Mayer policies and processes in a way that is appropriate, consistent and does not discriminate.

- Monitor the workplace and take steps to prevent and address inappropriate behaviour.
- Support our Equal Opportunity Policy.
- Make reasonable accommodations for workers with disabilities in keeping with the laws that apply.
- Must display and adhere to our company values.

**Oscar Mayer may discipline those who act in an unacceptable way, which may result in the termination of their employment.**

## Personal relationships

Oscar Mayer wants to avoid even the appearance of favouritism in the workplace (this isn't limited to intimate relationships but includes all close personal relationships (including friendships)). People with close personal relationships must not be in supervisory/subordinate reporting relationships or other positions of authority that can influence employment decisions about one another.

## Violent behaviour, alcohol, and drugs

Oscar Mayer wants a workplace that protects the health and safety of our employees and business partners. That is why Oscar Mayer prohibits intimidating behaviour, threats, and acts of violence in our workplace. It is also why Oscar Mayer requires a workplace that is free from drugs and

alcohol. You must come to work free from the influence of drugs or alcohol, and able to perform all your job duties.

Our "Drug and Alcohol Policy" does not allow you to use illegal drugs and alcohol in the workplace or on company property or to report to work with detectable levels of drugs or alcohol in your system during work time. In certain circumstances, drug and alcohol testing may be ordered as a condition of continued employment or after a reasonable suspicion that you are under the influence of alcohol or drugs.

## Confidential Information

### Confidential and Inside Information

You will, during the course of your duties with the Company, have access to confidential information relating to Oscar Mayer and its business. Confidential information includes all non-public information that might be of use to competitors or harmful to Oscar Mayer or its customers if disclosed.

Examples of confidential information include: (a) any competitive system, information or process; (b) non-public information about operations (including pricing and cost information), results, strategies and projections; (c) non-public information about business plans, business processes and client relationships; (d) non-public employee information; (e) non-public information received in the course of employment about

customers and suppliers (as well as potential customers and suppliers);  
(f) non-public information about technology, systems and proprietary products; and (g) trade secrets (example, product recipe information or future development project work).

During the course of your employment with Oscar Mayer, and continuing after, you must maintain the confidentiality of confidential information you obtain or create in connection with your activities whilst at work. Confidential information must not be disclosed to anyone (including internal employees) who are not authorised to receive it or do not have the need to know the information.

You must take precautionary measures to prevent unauthorised disclosure of Oscar Mayer's confidential information. This is in line with General Data Protection Act (2018), as well as to protect the interests of the business and its stakeholders.

Confidential information should never be discussed in public places. You should also ensure that business records, documents and e-mail are produced, copied, faxed, filed, stored, and discarded by means designed to minimise the risk that unauthorised persons might obtain access to confidential information. In addition, computers and work areas should be properly secured to prevent unauthorised access. Any information sent by

mistake should be reported via the Data Compliance process with an email to [datacompliance@oscarmayer.co.uk](mailto:datacompliance@oscarmayer.co.uk).

## Competitors Information

Any information that Oscar Mayer distributes must be accurate and objective, including information regarding our competitors. You should not make false or misleading statements about competitors, their products, or services. Obtaining information about Oscar Mayer's competition is an important and accepted practice provided it is accomplished in a proper, legal, and ethical manner. There are limits on how such information may be collected, especially confidential information.

If you participate in trade associations, or have other routine contacts with competitors, you must be especially careful not to divulge competitively sensitive information.

## Fair Competition

Oscar Mayer supports compliance with laws to protect fair competition. It is forbidden by law to collude on prices, dividing up territories, production volumes or other competition-relevant parameters with competitors, engage in prohibited price-fixing with distributors and/or abuse a dominant position on the market.

Such acts will not be tolerated at Oscar Mayer and will lead to corresponding penalties against employees concerned. Even informal

discussions, agreements without a particular form, or even certain conduct that could give the appearance of collusion must not be engaged in. All employees are required to be active in fair conduct within competition.

To avoid uncertainties in compliance, we have summarised the key stipulations of antitrust law in our guide "Antitrust Guidelines". This is available from your Group Head of People Services on request.

## Confidentiality Agreements

Any employee of Oscar Mayer that signs any confidentiality undertaking on behalf of the company is personally responsible for the company meeting the obligations under that undertaking for the duration of the agreement (which is often over 2 years). This means ensuring all relevant employees are made aware of and abide by the undertakings in the confidentiality agreement.

## Intellectual Property

Oscar Mayer's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how" and patents) are among our most valuable assets. Unauthorised use can lead to their loss or serious loss of value. Any use of Oscar Mayer trademarks and logos must be cleared in advance by the Executive Board.

## Environmental Compliance

Oscar Mayer is committed to compliance with all applicable laws and regulations relating to the protection of the environment. Failure to comply with such laws and regulations, even if unintentional, could result in significant penalties for Oscar Mayer. Additionally, Oscar Mayer prides itself on its ES&G initiatives.

## Product Quality

Our success depends on the ability to consistently produce quality products for our customers. Each site must maintain quality and product safety standards that are in compliance with applicable laws and regulations. In particular, each site must adhere to good manufacturing practices. You must conduct your activities for Oscar Mayer in a manner designed to maintain the integrity and quality of Oscar Mayer's products.



## Integrity Acknowledgement

You are responsible for your own actions, and it is your responsibility to read and understand this Code. To help ensure that you understand this Code and our expected standards of business conduct and integrity, you are required to read this Code at the time of hiring or appointment (or implementation for existing employees). When that has been done, you must confirm acknowledgment via Papaya or signing a hard copy of this policy:

- Confirm that you have read and understand the Code, that you are complying with the Code and other key Oscar Mayer policies, and that you will continue to comply.
- Disclose possible conflicts of interest and raise concerns you may have about possible conflicts or Code violations.

Oscar Mayer (via the People team) will send an e-mail reminder to all employees on an annual basis encouraging employees to review the Code and reminding them of the importance of understanding and abiding by the Code.

Oscar Mayer recognises that things change. If you have a new situation that may cause a real or apparent conflict of interest or other concern that potentially implicates any area covered by this Code, you should discuss

it with your Manager right away. Any such disclosures should also be updated on your acknowledgment form.

**Failure to read this Code does not excuse you from the obligation to comply with the terms of the Code.**

If you are unsure as to the proper interpretation of this Code or application of this Code to specific situations, you should direct your questions to and seek guidance from your People team.

## Disciplinary Action

Whilst Oscar Mayer would like to minimise the possibility of any formal action for non-compliance with the code, there may be occasions, where following a report and subsequent investigation, disciplinary action may need to be taken.

In the event of a violation of this Code or another written policy or contractual term, Oscar Mayer will investigate promptly and in accordance with Oscar Mayer's disciplinary procedures, including but not limited to reprimand, probation, suspension, demotion, or dismissal. This process will always follow a fair investigation, and an option to appeal will always be offered.

For example, you may be subject to discipline if you:

- Do not follow this Code or other Oscar Mayer policies.
- Break any laws or regulations that apply to Oscar Mayer.
- Tell an employee to break the Code, a policy, a law or a regulation.
- Do not share information, or provide false information, about a violation of the Code, a law or a regulation.
- Retaliate against another employee who reports a suspected violation of the Code, a law or a regulation, or who cooperates or helps with an investigation of a possible violation.

If you manage a person who commits a violation and the investigation shows that you ignored the Code or a law or regulation, you also may be face formal action and dealt with according to the seriousness of the violation.

To report a violation of the Oscar Mayer Code of Conduct you can:

- Speak to your Line Manager or Department Senior Manager.
- Speak to a member of the People Team.
- For serious matters, you can escalate to the Chief People & ESG Officer or Executive Team.
- Contact the anonymous and confidential Whistleblowing hotline:

- Navex Global – 0800 069 8234
- For Exploitation Issues contact the Modern Slavery Helpline on 0800 012 1700.

For Questions or clarification on any part of this Code, please contact a member of your People Team.

## **Oscar Mayer Code of Conduct & Ethics**

I ..... (Print Name) have read and understood the “Code” as laid out in this policy.

I also understand the consequences of violating any aspect of the “Code” as laid out in this policy.

Signed.....

Date.....