



Moy Park Limited Conflicts of Interest Policy

1 Policy statement

- 1.1 It is Moy Park's policy to conduct our business in compliance with the highest professional standards. Consistent with our Values, our position is simple: we conduct our business to the highest legal and ethical standards. We are committed to acting professionally, honestly, fairly and with integrity in all our business dealings and business relationships.
- 1.2 The purpose of this policy is to:
- 1.2.1 set out our responsibilities and the responsibilities of those working for us, in observing and upholding our position on conflicts of interests; and
 - 1.2.2 provide information and guidance on how to recognise and deal with conflicts of interests.
- 1.3 The policy is intended to provide broad guidance on certain key principles which we should observe in all our dealings and conduct. It is, therefore, important that we observe the spirit, as much as the letter, of this policy and not simply to mechanically apply the policy.
- 1.4 This policy contains controls to minimise this risk of conflicts, but we rely on staff to exercise judgment about how conflicts might be perceived, recognising that what at first sight might appear to be reasonable might nevertheless become the subject of unreasonable comment or criticism by external parties.

2 What is a conflict of interest?

- 2.1 A conflict will arise when your personal or commercial interests or activities influence, or appear to influence, your duty to act in the best interests of Moy Park in the decisions you take on behalf of the Moy Park.

A conflict may arise directly or indirectly – it may be real, potential or perceived. In cases where there might be a conflict, you should always challenge yourself by asking four basic questions:

1. Is it consistent with Moy Park's Values?
2. Is it consistent with Moy Park's Code of Conduct and/or this Policy?
3. Am I confident my personal or commercial interests do not conflict with Moy Park's interests?
4. Will it reflect well on me and Moy Park to others?

If the answer is "No" to any of these questions, do not do it, at least not before making us aware.

3 Relatives and Friends

- 3.1 Be mindful that a conflict may arise in relation to a relative or friend if your dealings with a customer or supplier are influenced by that relationship.
- 3.2 For example, you may have friends or relatives who are employed by, or are interested in, or have commercial relationships with, Moy Park's customers, suppliers or competitors. So, when you are dealing with customers or suppliers, you must always ensure that such connections do not influence, or appear to influence, your duty to act impartially and in the best interests of Moy Park.
- 3.3 For the purposes of this policy the term "relative" includes spouse, parent, sibling, grandparent, child, grandchild, mother / father-in-law, or domestic/civil partner and any family member who lives with you or who is otherwise financially dependent on you, or on whom you are financially dependent or with whom you have financial transactions.

4 Financial dealings

- 4.1 You should avoid personal financial transactions with customers and suppliers that may influence your ability to perform your job impartially and in the best interests of Moy Park.
- 4.2 You should avoid making external investments that could affect, or appear to affect, your decision-making on behalf of Moy Park, including investments in Moy Park's customers, suppliers and competitors.

5 Discretionary authority

Where friends or relatives are employed by, or have an interest in, a customer or supplier and you have any discretionary authority in your dealings with the customer or supplier as part of your job, you must not proceed without prior written approval from General Counsel.

6 Employment

- 6.1 You should not take any external roles or employment which may give rise to a conflict and should not compete, either on your own or in collaboration with other persons, with Moy Park.
- 6.2 If you would like to serve as an officer or director or consultant to an outside business on your own time, you must receive prior approval in writing from General Counsel, which must be updated annually.

7 How to deal with a conflict

- 7.1 Where a potential conflict is identified, you should contact General Counsel for advice and where necessary complete the Conflicts Register which is maintained by General Counsel and reviewed annually.
- 7.2 While a conflict of interest is not necessarily a breach of the Code of Conduct or of this policy, failure to make us aware of the situation will be a breach. If, therefore, you are not sure you should always seek guidance from General Counsel or another member of the Legal team.

8 Responsibility for this Policy

- 8.1 Moy Park's HR Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 8.2 General Counsel has primary day to day responsibility for this policy and for supervising the Company's conflicts arrangements. If General Counsel is unavailable and a response is required, you should contact another member of the Legal Department or your line manager.

9 Record keeping

- 9.1 We keep records and have appropriate internal controls in place for evidencing all conflicts.
- 9.2 You must declare and keep a written record of conflicts, which will be subject to managerial review.

10 Your responsibilities

- 10.1 You must ensure that you read, understand and comply with this policy.
- 10.2 The prevention, detection and reporting of conflicts are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 10.3 Some "red flags" that may indicate a conflict are set out below.
- 10.4 Employees may be liable to disciplinary action if they fail to comply with the provisions of this policy.

11 Some potential conflict indicators: "red flags"

Some situations that may create a conflict of interest (and where a failure to make us aware of the situation will be a violation of this policy).

1. You have an outside interest or investment in a competitor, customer or supplier.
2. Friends or relatives are employed by, or have an interest in, a customer or supplier, where you or they have discretionary authority in dealing with any of these businesses – e.g. awarding contracts or agreeing terms.
3. You have outside employment, office, consultancy or a directorship with a third party which competes, or collaborates, with Moy Park.
4. Arranging for the employment or engagement by Moy Park of a friend or relative in your team (other than for say short term summer jobs).
5. Being asked by a customer or supplier to employ a relative.

Dated: September 2018