

**LIPTON**  
*Teas and Infusions*

Our code of  
*Business*  
*Principles*

May 2023



## THE CODE AND OUR STANDARD OF CONDUCT

The Code of Business Principles  
Living the Code  
Legal Consultation  
Responsible Risk Management  
Responsible Innovation  
Product Safety & Quality

## COUNTERING CORRUPTION

Avoiding Conflict of Interest  
Anti-bribery  
Gifts & Hospitality  
Accurate Records, Reporting & Accounting  
Protecting LIPTON Teas and Infusions' Physical and Financial Assets and Intellectual Property  
Anti-money Laundering

## RESPECTING PEOPLE

Occupational Health & Safety  
Respect, Dignity & Fair Treatment

## SAFEGUARDING INFORMATION

Protecting LIPTON Teas and Infusions' Information  
Competitors' Information  
Personal Data & Privacy  
Use of Information Technology

## ENGAGING EXTERNALLY

Responsible Marketing  
Responsible Sourcing & Business Partnering  
Fair Competition  
Contact with Government, Regulators & Non-governmental Organisations (NGOs)  
Political Activities & Political Donations  
External Communications - the Media, Investors & Analysts

# Our code of Business Principles is *your guide*

We're honoured to introduce the most important document in our new company - our *Code of Business Principles*.

As LIPTON Teas and Infusions embarks on an exciting journey as a standalone entity, this will be the guide to how we do business, with integrity and fairness, with respect for the law and our values. It must be followed by everyone at LIPTON Teas and Infusions.

Growth is at the core of our values. We work to grow a world of wellbeing and create value for all - for our consumers, our people, farming communities, investors, stakeholders, business partners and our planet.

Just like Nature we learn, we change, we grow, and we adapt to a fast-moving, unpredictable world. But our values remain constant. Values of putting people first; leading with transparency and fairness; supporting our employees; and making a positive lasting impact on our communities and the planet.

We work in countries with different economic, regulatory and social landscapes. No matter where we are, our *Code of Business Principles* provide a clear set of guidelines on how to put our values into practice. It's about making the right choices ethically and with integrity - be that in our daily work across our supply chain, sourcing raw materials, external engagements, or cyber and information security.

Following the Code doesn't just mean protecting our company and people. It also helps to make sure that behaving responsibly and respectfully becomes an essential part of who we are. To help you respect the Code and our Integrity Framework, we've set up a Global Business Integrity Committee, along with processes for yearly reviews and business integrity training.

Read this document carefully. It's your guide to making the right choices day in, day out. If you have any questions or face any challenges, contact your Business Integrity Officer or any of our Business Integrity Committee members.

Thank you,  
Nathalie and Wendela



Nathalie Roos  
CEO



Wendela van Uchelen  
Chief Legal Officer



# Part 1

## The code and our standard of conduct

The Code of Business Principles  
Living the Code  
Legal Consultation  
Responsible Risk Management  
Responsible Innovation  
Product Safety & Quality



At LIPTON Teas and Infusions,  
we believe in growing responsibly and sustainably



# The code of *Business conduct*

**Our Code of Business Principles defines the non-negotiable rules all employees must follow.**

**It codifies our values, making clear what is expected from our people.**

**Through living our Code, we'll bring our values and purpose to life, every day in everything we do.**

## **Standard of Conduct**

We do business with honesty, integrity and openness, and with respect for the human rights, the environment and interests of our people.

Similarly, we respect the rights and interests of everyone that we deal with.

We're committed to transparency, so our stakeholders trust what we do.

## **Obeying the law**

LIPTON Teas and Infusions companies and employees are required to comply with the laws and regulations of the countries we work in.

## **Embedding human rights and committed to fighting corruption**

In line with the UN Guiding Principles on Business and Human Rights, which we are embedding throughout our business, we are committed to respecting internationally recognized human rights. We base our human rights commitments and policy, on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises. We are driving the practical implementation of respect for human rights through due diligence processes. We are committed to doing business with integrity, consistently demonstrating high global standards, and fighting corruption in all its forms.



# The code of *Business conduct*

## Employees

We're committed to a working environment that promotes diversity, gender equality, inclusion, life-long learning and equal opportunity. We believe in a workplace where there is mutual trust, respect for human rights and no discrimination. We support the physical and mental wellbeing of our employees, ensuring safe working conditions.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We won't use any form of forced, compulsory, trafficked or child labour. We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We'll give employees a total remuneration package that meets or exceeds the legal minimum standards and is in line with industry standards in the markets we work in. We're committed to paying a living wage, so people can meet their everyday needs.

We'll always communicate clearly and openly with our colleagues through company-based information and consultation procedures.

And we'll provide transparent, fair and confidential procedures for employees and third parties to raise concerns. We won't retaliate against whistle-blowers or employees that report problems.

## Consumers

We're committed to providing purposeful branded products and services which consistently offer value in terms of price and quality, and which are safe for use. Products and services will be accurately and properly labelled, advertised and communicated.

## Shareholders

We'll do business in line with internationally accepted principles of good corporate governance. We'll provide timely, regular and reliable information on our activities, structure, financial situation and performance to our shareholders.

## Business Partners

We're committed to establishing mutually beneficial relations with our suppliers, customers and business partners. In our business dealings we expect our partners to keep to business principles in line with our own. This means complying with our third-party policies and a commitment to working with us to address issues that negatively impact society and the planet. We'll work with these partners to raise standards so that their employees are paid a living wage and are not subject to forced, compulsory, trafficked or child labour.



# The code of *Business conduct*

## Compliance - Monitoring - Reporting

Compliance with the Code of Business principles is essential in our business. The LIPTON Teas and Infusions Executive Leadership Team (eLT) is responsible for making sure these principles are applied throughout LIPTON Teas and Infusions.

The Chief Executive Officer is responsible for implementing these principles and is supported in this by the eLT globally, by each of the regional Presidents regionally, by the Global Business Integrity Officer (the GBIO) and Global Business Integrity Committee (the GBIC) and (where applicable) by the Local Business Integrity Officer (the LBIO) and the Local Business Integrity Committee (the LBIC).

Day-to-day responsibility is delegated to all senior management of the geographies, functions and operating companies. They are responsible for implementing these principles, supported (where applicable) by the LBIO, the LBIC, the GBIO and the GBIC.

Assurance of compliance is given and monitored each year.

Compliance is subject to review by the eLT supported by the GBIO, GBIC, Audit and our external accountants.

Any breaches of the Code must be reported.

The eLT will not criticise management for any loss of business resulting from following these principles and other mandatory policies. We've made provision for employees to be able to report in confidence, and no employee will suffer as a consequence of doing so.

## Community Involvement

We strive to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies and communities we're part of.

## Innovation

In our scientific innovation, we'll respect the concerns of our consumers and of society. We'll work on the basis of sound science, applying rigorous standards of product safety.

## Competition

We believe in vigorous yet fair competition, and support the development of appropriate competition laws. Our companies and employees will work in accordance with the principles of fair competition and all applicable regulations.

## The Planet

We're committed to making continuous improvements in the management of our environmental impact, and to the longer-term goal of developing a sustainable business.

We'll work in partnership with others to promote environmental care, increase understanding of environmental issues, and share good practice.



# The code of *Business conduct*

## Public Activities

We'll always promote and defend our legitimate business interests.

We'll co-operate with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect business interests.

We don't support political parties, nor do we contribute to groups whose activities are designed to promote party interests.

## Bribery & Corruption

We do not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe.

Any demand for, or offer of, a bribe must be rejected immediately and reported to management. Our accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be set up or maintained.

## Conflicts of Interests

All employees and others working for LIPTON Teas and Infusions are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company.

Employees must not seek gain for themselves or others through misuse of their positions.

## Data

We're committed to the responsible, ethical and fair use of data.

We collect and use data in line with our values, applicable laws, and with respect for privacy as a human right.

## Note

In this Code the expressions 'LIPTON Teas and Infusions' and 'LIPTON Teas and Infusions companies' are used for convenience and mean the LIPTON Teas and Infusions Group of companies comprising LIPTON Teas and Infusions B.V., and its respective subsidiary companies.

The eLT stands for LIPTON Teas and Infusions Leadership Team, meaning the Executive Leadership Team of LIPTON Teas and Infusions B.V.

# Living the code

**Our values are the foundation of our success and essential to achieving our ambition of making sustainable living commonplace. Living the Code means putting our values into practice and reiterating our commitment to doing good.**

**Our consumers and customers trust us for doing business with integrity. This is one of our greatest assets, and requires the highest standards of behaviour.**

Our Code of Business Principles (the Code), and the policies that support it (Code Policies), set out the standards required from all our employees. We also require our third-party business partners and their employees to follow business principles in line with our own.

These expectations are set out in our Code Policy on Responsible Sourcing and Business Partnering that underpins our third-party compliance programme.

Breaching the Code or Code Policies could have serious consequences for our business and for the individuals involved.

If illegal conduct is involved, there could be large fines for LIPTON Teas and Infusions, imprisonment for individuals, and significant damage to our reputation.

This Code Policy explains how to make sure the Code and all Code Policies are understood and followed by all our employees and others working for us. It confirms everyone's responsibility to speak up and report suspected or actual breaches, and outlines how such situations must be managed. Any failure to comply with the Code and any of the Code Policies is taken seriously by LIPTON Teas and Infusions and may result in disciplinary action, including dismissal and legal action.

References in the Code and Code Policies to 'employees' and 'you' include the following:

- LIPTON Teas and Infusions employees, whether full time, part time, fixed term, permanent or trainees
- People with statutory director roles or equivalent responsibilities
- Employees of new acquisitions, from the date that the company is acquired

Living the Code is a team effort. The Code and Code Policies cannot cover every eventuality, particularly as laws differ between countries. If specific situations are not expressly covered, the spirit of the Code and Code Policies must be upheld by using common sense and good judgement, always in compliance with applicable laws.

## MUST

You must:

- Make sure you know and understand the requirements of our Code and Code Policies
- Attend relevant training as required by the Global Compliance Officer, the GBIO, the GBIC, your Line Manager or (where applicable) the LBIO and LBIC.
- Follow the Code and Code Policies: if you are unsure of how to interpret these, or have any doubts about whether specific behaviours meet the standards required, you must seek the advice of the GBIO, the GBIC, your Line Manager or (where applicable) the LBIO and LBIC.
- Immediately report actual or potential breaches of the Code or Code Policies, whether relating to you, your colleagues, or people acting on LIPTON Teas and Infusions' behalf and whether accidental or deliberate.

This includes instances where business partners' behaviour may not meet our standards

# Living the code

## MUST

Your Line Manager is usually the right person to report potential or actual breaches to. If this is not appropriate, you must talk to one of the following:

- (where applicable) your LBIO and LBIC
- the GBIO
- A member of the GBIC
- LIPTON Teas and Infusions' confidential Code Support Line (where allowed by local law), by telephone or web using the telephone number or web address communicated locally.

If asked not to report a potential breach by your Line Manager or another employee, you must immediately report it to the GBIO and / or the Code Support Line.

As well as this, if you are at Manager level or above, you must:

- Lead by example, setting the right tone from the top, showing you are familiar with the Code and Code Policies, and taking steps to embed a culture of integrity across all that we do
- Complete an annual Code declaration

Make sure that all your team members, including new joiners:

- Have read the Code and Code Policies
- Have completed any mandatory training
- Understand how to raise concerns and / or report actual or suspected breaches
- Give the training that the GBIC or their Line Manager has asked of them, e.g. Business Integrity Moments, face-to-face briefings and team discussions
- Offer guidance and support about the Code and Code Policies to your team where needed and escalate unresolved questions to their Line Manager and (where applicable) their LBIO and LBIC
- Make sure that anyone who raises concerns, or highlights potential or actual breaches, receives support and respect and that there is no retaliation against them
- Make sure that concerns raised are taken seriously and addressed quickly, treating related information with discretion
- Discuss concerns with your Line Manager and (where applicable) their LBIO and LBIC as soon as possible to decide the right course of action, including who else to inform

- Collaborate further and complete any documentation (e.g. case information and lessons learnt) as may be required by their Line Manager and (where applicable) their LBIO and LBIC
- Where a breach may have occurred within their operations, consider what extra communications, training or changes to business controls and procedures might be needed to reduce the likelihood of similar breaches occurring

## MUST NOT

You must not:

- Ignore or fail to report situations where you think there is or may be a breach of the Code or Code Policies
- Try to prevent a colleague from reporting a potential or actual breach or ask them to ignore an issue
- Retaliate against anyone who reports a potential or actual breach
- Discuss any potential or actual breach under investigation with other people, unless this has been cleared with the investigation team

# Legal Consultation

**Employees must always comply with laws and regulations that apply to the countries in which we operate. Not knowing the law is no excuse. Prompt legal consultation is vital to make sure that our legitimate business interests and opportunities are protected.**

This Code Policy sets out how and in what circumstances you must seek legal advice from LIPTON Teas and Infusions' Global Legal Team and from external legal counsel (this Code Policy excludes the Tea Estates and countries that have inhouse Legal Counsel, which have Local Legal Consultation policies).



## MUST

Heads of all countries or senior leadership teams and heads of all corporate and functional leadership teams must make sure the relevant Legal Business Partner from the Global Legal Team or external legal counsel is invited to attend team meetings when appropriate.

You must:

- Immediately inform your Line Manager, (where applicable) your LBIO and LBIC (or other appropriate person - see our Code Policy on Living the Code) and take legal advice if you suspect or discover any illegal activity in relation to LIPTON Teas and Infusions' business involving third parties
- Promptly seek advice from your line manager or the Global Legal Team
- Note that legal advice to the business has been outsourced to external counsel. Details of external counsel and instances on when advice must be sought from them is outlined on the legal page on the company intranet

## MUST NOT

You must not:

- Do anything that the Global Legal Team has advised is illegal and/ or unlawful. Where an activity is not illegal or unlawful, but legal advice highlights significant risks for LIPTON Teas and Infusions, such as litigation, you must not proceed without express senior line management authorisation
- Appoint a private investigator without prior approval from the GBIO of LIPTON Teas and Infusions

Employees outside the Global Legal Team must not

- Appoint, manage or remove external legal counsel without consultation with the Global Legal Team

# Responsible Risk Management

**Risk management is integral to our strategy and to achieving our long- term goals. Our success depends on our ability to find and make the best of the opportunities generated by our business and the markets we work in.**

We take an embedded approach to risk management which puts risk and opportunity assessment at the core of the leadership team's agenda. We define risks as actions or events that have the potential to impact our ability to achieve our goals. We identify and set out to reduce risks such as loss of money, reputation or talent, as well as 'upside risks' such as failure to deliver our strategy if it does not strengthen brand equities or grow in growing channels.

Our Risk Management approach is embedded in our day-to-day business.

It includes:

- Governance of LIPTON Teas and Infusions, our organisational structure, and delegation of authority

- Vision, Strategy and Objectives
- Code of Business Principles, Code Policies and Standards
- Risk and Control Frameworks
- Performance management and business processes
- Compliance and assurance activities

## MUST

If you are a manager or above, you must implement our Principles of Risk Management as follows:

- Accountability: you must identify and manage the risks that relate to your role
- Risk Appetite: you must determine the level of risk, after the implementation of controls, that you are prepared to accept so that there is not a significant threat to achieving our goals
- Risk Mitigation: you must put the right controls in place, and make sure they are working, in order to meet our objectives

If you're a member of a leadership team, you must:

- Make sure that the risk management activities, as outlined in our Risk and Control Frameworks, are being followed for your areas of responsibility
- Have a yearly holistic risk discussion during which:
  - Key business risks for which you are responsible are identified;
  - You review how those risks are being managed;
  - Any gaps in your desired risk appetite are identified.
- Perform regular reviews and make sure risks are mitigated

If you are the project leader of any transformational projects you must, together with your teams:

- Identify the main risks associated with your project achieving its goals
- Prepare risk mitigation plans
- Review progress with the project steering group

# Responsible *innovation*

**Innovation is fundamental to our success and core to our strategy. The integrity and objectivity of our science are key foundations for responsible innovation.**

We carry out responsible, safe and sustainable research and innovation, which fully respects the concerns of consumers and society. In meeting consumer needs, our innovations are based on sound science and technology, and reflect high standards and ethical principles.

Our global standards apply to all aspects of research and innovation, including: the safe and sustainable design of new products, processes and packaging; product and brand development; open innovation collaborations; and publication of scientific research.



## MUST

If you are involved in scientific research and innovation, you must comply with all standards relevant to your area of work, in order to:

- Make sure that risks to consumer safety, occupational safety and the environment are suitably assessed and managed
- Ensure appropriate specifications of raw materials, products and packaging
- Effectively manage safety risks from food allergens
- Make sure research among people is conducted to the highest ethical standards
- Ensure the integrity, robustness, objectivity and transparency of all scientific research and collaborations with external partners
- Maintain and make accessible records of all research, including study protocols and data, and their interpretation and decisions made
- Raise any concerns about actual or potential non-compliance with this Code Policy with your Line Manager or your Business Partner in R&D

## MUST NOT

You must not:

- Give external presentations or share publications that have not been approved through our internal clearance procedures
- Collaborate with third parties outside a structured and approved contractual framework



# Product *Safety* and Product *Quality*

**Our reputation and success is founded upon providing safe, high-quality products and services that meet all applicable standards and regulation, both internal and external within the end to end value chain.**

All employees have a role to play in making sure that our products and services we provide meet or exceed the expectations of customers.

We'll act fast to recall products or services that don't meet our high standards.



## MUST

You must:

- Measure and record product and process performance and take effective steps or corrective action to provide great product quality experiences for our customers
- Urgently report any product safety or quality concerns to your Line Manager

## MUST NOT

You must not:

- Knowingly produce or distribute products, including promotional items, or services that could adversely affect employees' or consumers' health, endanger customers, or harm our reputation
- Take decisions about product safety or quality without the authority or knowledge to do so
- Respond to customers or consumers about product quality or safety of without authorisation to do so



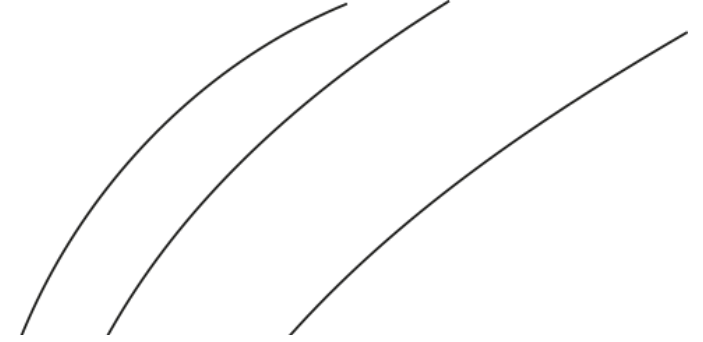


# Part 2

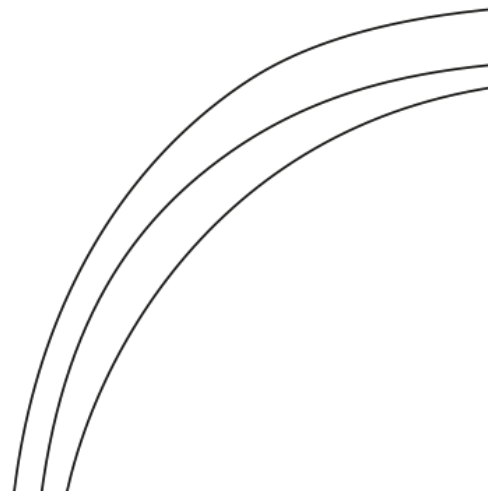
## Countering Corruption

- Avoiding Conflict of Interest
- Anti-bribery
- Gifts & Hospitality
- Accurate Records, Reporting & Accounting
- Protecting Physical and Financial Assets and Intellectual Property
- Anti-money Laundering





We behave with integrity, wherever we are.  
We do the right thing for the long-term success of  
LIPTON Teas and Infusions



# Avoiding *conflicts of interest*

**Conflicts of interest can damage the reputation and effectiveness of our business and people. They arise when an employee allows their personal interests to affect their objectivity.**

**This Code Policy sets out what you must do to prevent and manage such situations.**

A conflict of interest may arise, and must be reported, if you:

- Hire, manage, or have an influence on the workload, performance assessment, granting of approvals or rewards of someone with whom you have a close personal relationship
- Accept or perform a Public Official role, or have a family member or a close personal contact who is a Public Official with the ability to take decisions that could impact our business

- Have a close personal interest in the business of competitors or other third parties relevant to LIPTON Teas and Infusions. This includes cases where you, your family members or a close personal contact:
  - work for or provide any services to competitors or to any other third parties relevant to our business
  - hold investments other than in publicly traded pension funds, index linked or tracker funds that represent:
    - (i) Substantial interests in a competitor, state-controlled or influenced entity, or any other third party relevant to LIPTON Teas and Infusions business (5% of the net worth of any of these entities)
    - (ii) Any interest in a third party if you, or one of your team, is involved in engaging, monitoring or investigating the third party's performance
- Allow your non-financial interests such as personal values, beliefs, welfare or political views to take precedence over LIPTON Teas and Infusions' lawful and ethical expectations, affecting your performance or objectivity at work



# Avoiding *conflicts of interest*

## MUST

You must:

- Make sure LIPTON Teas and Infusions is best placed to benefit from potential business opportunities
- Follow the process outlined here to immediately report an actual, perceived or potential conflict of interest to your Line Manager
- Follow the same process if you are interested in taking up, in a personal capacity, a proposed directorship (or equivalent) of another organisation, whether commercial or not-for-profit, including roles in trade associations or public bodies.

This obligation extends to new joiners that hold directorships and have not disclosed them as part of the recruitment process

These disclosure requirements exclude roles of school governors, governing positions in amateur sporting or recreational groups, and directors of property or housing blocks in which you live

- Get written approval from our Global Compliance Officer before becoming a director of any publicly listed company
- Make sure that external commitments do not:
  - Distract you from your commitments and contribution to LIPTON Teas and Infusions
  - Provide access to commercially sensitive information concerning actual or potential LIPTON Teas and Infusions competitors (see Code Policies on Fair Competition and Competitors' Information); or
  - Create any liability for LIPTON Teas and Infusions. You must inform the other organisation that you take up this position on a personal basis, with no responsibility for LIPTON Teas and Infusions, and that any fees or benefits that arise from your engagement are not passed on to LIPTON Teas and Infusions

## MUST NOT

You must not:

- Accept appointments, debate, vote, or participate in any decision-making process or activity where a conflict of interest exists or might arise until your Line Manager and (where applicable) your LBIO and LBIC has given clearance
- Take, or divert to others, any business opportunities that arise in the course of doing your job at LIPTON Teas and Infusions that could be of interest to LIPTON Teas and Infusions
- Misuse your position to advance personal interests
- Hire, contract or engage any individual or organisation without making sure they are free of conflict of interest with LIPTON Teas and Infusions

# Anti-Bribery

**To support global efforts to fight corruption, most countries have laws that ban bribery: many apply these 'internationally' to behaviour beyond their borders.**

**A breach of such laws could result in legal and financial consequences for LIPTON Teas and Infusions and individuals.**

**Dealings with public officials are particularly high risk: even the appearance of illegal conduct could damage our reputation.**

Our commitment to doing business with integrity requires consistently high global standards: our zero-tolerance approach towards bribery and corruption applies to everything we do, regardless of local business practices, and prohibits both public and commercial bribery (e.g. to or from any third party).

This Code Policy covers what you must and must not do to meet our requirements.

## MUST

You must:

- Always make clear, internally and when dealing with third parties, that LIPTON Teas and Infusions has a zero tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favour to improperly influence a business outcome
- Immediately notify your Line Manager, (where applicable) your LBIO and LBIC if you become aware of any suggested or actual payment or other transaction which has the potential to be in breach of this Code Policy
- Follow our third party compliance policies and controls in line with the Responsible Sourcing and Business Partnering Code Policy
- Use electronic communications or e-government solutions (in areas such as licencing, procurement, taxes, brand protection, etc) or any other means available to reduce face-to-face interactions with public officials and the connected risks of bribe solicitation

## MUST NOT

You must not directly or indirectly (e.g. via suppliers, agents, distributors, consultants, lawyers, intermediaries or anyone else):

- Offer or give bribes or improper advantages (including facilitation payments) to any public official or other individual or third party, which are, or give the impression that they are, intended to influence decisions about LIPTON Teas and Infusions
- Ask for or receive bribes or improper advantages from any third party, which are, or give the impression that they may be, intended to influence decisions by LIPTON Teas and Infusions

In exceptional situations where employees cannot escape imminent threat to their life, liberty, or physical harm without meeting a demand for payment, such a payment may be made, but those involved must immediately report full details to their Line Manager and (where applicable) their LBIO and LBIC. This is to ensure that the matter can be fully investigated; necessary financial records kept; and further steps taken if needed (see also Code Policy on Accurate Records, Reporting and Accounting).

# Gifts and hospitality

**All our relationships must reflect our commitment to doing business with integrity.**

**Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product launches. But accepting or receiving gifts and hospitality can be open to abuse, or generate actual or perceived conflicts of interest. It should occur sparingly and always be legitimate and proportionate in the context of our business.**

This Code Policy sets out your responsibilities in relation to gifts and hospitality. It makes clear what forms of gifts and hospitality are never allowed. And it explains in what circumstances gifts or hospitality can legitimately be given or received.

The country leaders of LIPTON Teas and Infusions must make sure that gifts and hospitality either given or received do not exceed local monetary limits. These limits must be clearly communicated by them in each country.

## MUST

You must:

- Apply this Code Policy in good faith to make sure gifts and hospitality are never considered to be excessive, confer improper advantage, or create an actual or perceived conflict of interest (see Code Policies on Anti-Bribery and Avoiding Conflicts of Interest)
- Familiarise yourself with and follow the local monetary limits we have in place for gifts and for hospitality, unless exempt in line with this Code Policy

## GIFTS

As a LIPTON Teas and Infusions employee, you must:

- Make sure that any gifts offered (other than LIPTON Teas and Infusions branded merchandise) or received do not exceed the local monetary limits for gifts; are one-off in nature; and always comply with the Code Policy on Avoiding Conflicts of Interest. Although you're not required to record such gifts centrally, you must keep your own records for inspection.

All exceptions require clearance in advance by your Line Manager and (where applicable) your LBIO and LBIC.

- Make sure that if you are offered a gift above the local monetary limits for gifts, you politely decline and explain the LIPTON Teas and Infusions rules. In exceptional situations where such gifts have to be accepted to avoid causing serious offence, or circumstances genuinely prevent their return, you must:
  - Get clearance from your Line Manager and (where applicable) your LBIO and LBIC; and where appropriate take steps for the gift to be donated to charity
  - Make sure that all gifts by employees of LIPTON Teas and Infusions branded merchandise are legitimate and proportionate

# Gifts and hospitality

## MUST

### HOSPITALITY

You must:

- Make sure that hospitality is only offered or accepted if:
  - There is a legitimate business need
  - Its value does not exceed the local monetary limits for hospitality; and
  - It's a one-off, rather than regular thing
  - It's in the form of a locally hosted meal, attendance at, or participation in an organised 'team-building' occasion, local cultural or sporting event, local industry award ceremony, business site visit or similar responsible activity
- Usual business contacts from LIPTON Teas and Infusions or other parties are there



You're not required to record such hospitality centrally but must keep your own records for inspection. You must also make sure all related expenses are approved using our standard local expense processing and clearance systems.

If in exceptional circumstances you seek to offer or accept hospitality above the local monetary limits, you must:

- Check your Line Manager supports this
- Get clearance from your Line Manager and (where applicable) their LBIO and LBIC
- Once approved, ask the third party to confirm that the offer or acceptance of hospitality also complies with its equivalent gifts and hospitality policy

In other circumstances where you are offered or asked for hospitality that exceeds local monetary limits, you must politely decline by referring to this Code Policy.

## MUST NOT

You must not:

- Discuss, offer or accept any gifts or hospitality activity involving public officials or their family members without prior clearance from your Line Manager and (where applicable) your LBIO and LBIC
- Offer or accept any gifts or hospitality, or any other favours which are intended or might be seen to influence business decisions or create an obligation to do something in return
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options
- Offer or accept any hospitality involving overnight stays or foreign travel without prior written clearance from their Line Manager and (where applicable) your LBIO and LBIC
- Offer or accept any hospitality that is not consistent with the Code Policy on Respect, Dignity and Fair Treatment, or may cause offence under local norms and customs.

# Accurate *reports, reporting and accounting*

**The financial reports and other information that we hold internally and the financial information we provide to shareholders, regulators and other stakeholders must be accurate and complete.**

**Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Procedures and processes must be in place to make sure underlying transactions are properly authorised and recorded.**

Any failure to record transactions accurately, or falsifying or creating misleading information or influencing others to do so, could constitute fraud and result in fines or penalties for employees or for LIPTON Teas and Infusions.

This Code Policy sets out what you must do to ensure the accuracy of our business records and financial information.

## **MUST**

You must:

- Record all transactions accurately, completely and promptly
- Only perform transactions, such as buying, selling or transferring goods or assets, for which you are authorised
- Make sure transactions you approve are legitimate and based on valid documentation
- Notify your Line Manager and (where applicable) their LBIO, LBIC and the LIPTON Teas and Infusions Group Controller Director of any potential fraud or arrangements to facilitate tax evasion, or other misrepresentation of accounting or other information, or if a 'facilitation payment' has been paid to avoid physical danger or due to an error in judgement
- Where instructed in the context of a legal hold, retain records in accordance with LIPTON Teas and Infusions' data retention standards or for longer, if required by local laws or regulations



# Accurate *reports, reporting and accounting*

## MUST

- Keep records that could be relevant to any ongoing audit, litigation or regulatory investigation, even if they exceed the normal retention period if instructed to do so
- Co-operate fully, openly and honestly with internal and external auditors, tax authorities and other regulators
- Make sure you are aware of all information relevant to their work

If you're responsible for reporting financial and other business information, you must:

- Comply with all applicable laws, for example, those around financial statements, tax and environmental requirements
- Follow all applicable external reporting standards and regulations, such as international and national accounting standards, financial regulator rules, health and safety requirements, corporate governance codes and regulatory standards

- Follow LIPTON Teas and Infusions' reporting instructions and timetables, information standards and information definitions

If you're involved in accounting, you must:

- Make sure sales, profits, assets, and liabilities are recorded in the right time periods
- Properly document assumptions that underpin accounting records, especially those to do with provisions, journal entries and liabilities, including tax
- Regional Finance Directors and Country Controllers must complete quarterly and annual Financial Reporting Declarations in line with instructions from LIPTON Teas and Infusions Group Finance.

## MUST NOT

You must not:

- Do anything to artificially inflate or shift sales or profit between reporting periods
- Create, maintain or use others to produce or maintain undisclosed or unrecorded accounts, funds or assets
- Conceal, alter or falsify company records, accounts or documents.



# Protecting *physical and financial* assets and *intellectual property*

**We're all responsible for protecting LIPTON Teas and Infusions' assets.**

**This Code Policy covers the protection of physical assets and property, financial assets and intellectual property.**

**For information on protecting some other kinds of assets, read our Code Policies on Occupational Health and Safety and Protecting LIPTON Teas and Infusions' Information.**

## MUST

### Physical assets/property

- Take care that any LIPTON Teas and Infusions physical assets or property you come into contact with are not damaged, misused or wasted. Physical assets and property includes factory and laboratory equipment, LIPTON Teas and Infusions products or components, buildings, computers and company vehicles

The head of each LIPTON Teas and Infusions site must:

- Identify potential hazards from activities and services on-site

- Evaluate the risk of damage to site assets from such hazards, and of any potential business interruption or liability that could result
- Reduce risks to an acceptable level

### Financial assets

- Protect LIPTON Teas and Infusions' financial assets - such as cash, bank accounts and credit cards - guarding against misuse, loss, fraud or theft
- Only authorise commitments, expenditure, borrowing or other financial transactions in line with your role as specified in local, regional or global financial or treasury authority schedules
- Comply with our standards when involved in hedging contracts or transactions

### Intellectual property

- Report to the Global Legal Team any suspected counterfeit products or any product, packaging, communication or marketing practice that you suspect of infringing our copyright, trademarks, patents, design rights, domain names or other intellectual property rights

- Make sure all necessary checks and filings have been done for patents, designs and trademarks or other intellectual property rights, when researching, developing or preparing to launch new brands, sub brands, services, designs, inventions, communication, advertising and promotional materials
- Make sure a contract is in place with appropriate clauses to protect our intellectual property rights, and ensure freedom to use results when collaborating with third parties

## MUST NOT

You must not:

- Remove LIPTON Teas and Infusions' physical assets or property from company premises without permission or use them for inappropriate purposes
- Knowingly infringe the valid patents, design rights, trademarks, copyright and other intellectual property rights of any third party

# Anti-money Laundering

**To protect our reputation and avoid criminal liability, it's important not to become associated with any form of criminal activity. In particular, we must make sure not to receive proceeds of criminal activities, as this can amount to the criminal offence of money laundering.**

This Code Policy sets out essential steps you must take to avoid being implicated in anything like this.

## MUST

You must:

- Immediately inform your Line Manager and (where applicable) your LBIO and LBIC if you have any suspicions about actual or potential money laundering activity
- Look out for warning signs of money laundering, such as:
  - 1) Supplier requests to:
    - Pay funds to a bank account in the name of a different third party, or outside the countries they work in
    - Take payments in a form outside the normal terms of business

- Split payments to several bank accounts
  - Overpay
- 2) Customer payments to LIPTON Teas and Infusions:
- From multiple bank accounts
  - From bank accounts overseas, when not a foreign customer
  - Made in cash, when usually made by cheque or electronically
  - Received from other third parties
  - Made in advance when not part of normal terms of business

If you're involved in engaging or contracting with third parties such as new suppliers, customers and distributors, you must:

- Screen third parties to assess their identity and legitimacy before contracts are signed or transactions occur. Various factors will determine the right form and level of screening

- Decide, with guidance from your Line Manager and (where applicable) your LBIO and LBIC, which tools and processes to use to enable appropriate screening and record-keeping (see the Responsible Sourcing and Business Partnering Code Policy)
- Carefully consider, where necessary in consultation with your Line Manager and LBIO and LBIC, screening outcomes before deciding whether to do business with the third party

Finance managers who support Supply Chain Management and Sales must regularly monitor and review suppliers, customers and other third-party service providers to spot business activity or governance that could suggest money laundering.

## MUST NOT

You must not:

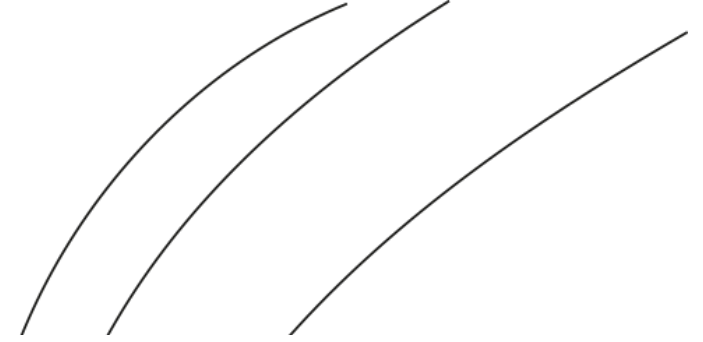
- Assume third-party screening has already taken place. Not checking or updating screenings periodically will put LIPTON Teas and Infusions and our people at risk



# Part 3

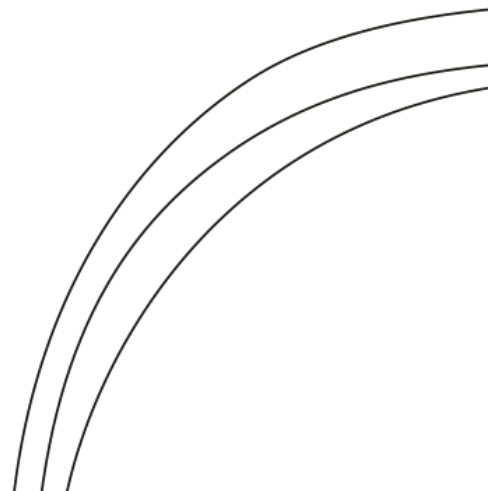
## Respecting People

Occupational Health & Safety  
Respect, Dignity & Fair Treatment



People should be treated with dignity, honesty and fairness. We celebrate diversity and respect people for who they are and what they bring.

We foster working environments that are fair and safe, where rights are respected and everyone can achieve their full potential



# Occupational Health and Safety

**We're committed to providing healthy and safe working conditions. We comply with all applicable legislation and regulations and aim to continuously improve health and safety performance.**

Everyone at LIPTON Teas and Infusions has a role to play. Managers are responsible for sharing and implementing the occupational health and safety requirements of their

direct reports and third parties under their control. As a condition of employment, we all have a duty to work safely.

This Code Policy outlines our individual and shared responsibilities for health and safety.

## MUST

You must:

- Work and behave safely
- Comply with health and safety procedures and instructions relevant to your work and about which you've been trained or told
- Help make sure everyone we work with, including contractors and visitors, is familiar with and follows health and safety procedures and instructions
- Only do work you are trained, competent, medically fit, sufficiently rested and alert enough to do
- Make sure you know what to do in an emergency where you work, or if you're elsewhere on business
- Promptly report to local LIPTON Teas and Infusions management any actual or near-miss accident or injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment, so that steps can be taken to immediately correct, prevent or control it



# Occupational Health and Safety

## MUST

Team leaders have overall responsibility for health and safety at their location and must:

- Establish and maintain an appropriate health and safety at work management system for their sites and their teams, including the appointment of committees, managers, competent experts and a system for gathering employees' thoughts or concerns
- Identify health and safety hazards and manage risks arising from their team and their site's activities
- Regularly review and comply with all applicable local health and safety legislation, including relevant mandatory LIPTON Teas and Infusions requirements
- Develop site and role-specific health and safety improvement objectives, and monitor performance, including an annual review of the management system's effectiveness
- Report mandatory Key Performance Indicators (KPIs) through our Safety, Health and Environment (SHE) reporting system

- Report all incidents, accidents and near misses in line with reporting requirements, including thorough investigation, follow-up and communication of lessons learned
- Maintain, communicate and test all site and role emergency plans
- Make sure all employees, contractors and visitors receive information and training in health and safety relevant to their roles and activities

In countries where directors of the local legal company or entity must take responsibility for health and safety matters for all national premises in order to meet legal regulatory requirements, our premises leaders must liaise with the board of directors to agree the health and safety at work management system and the approach needed for appropriate, ongoing review.



## MUST NOT

You must not:

- Do work or related activity, such as driving, when under the influence of alcohol or drugs, or when using medication improperly
- Carry on with any work that becomes unsafe or unhealthy
- Assume someone else will report a risk or concern

# Respect, dignity and fair treatment

**Business can only flourish in societies where human rights are respected, upheld and advanced. We recognise that each business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.**

We're committed to making sure all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity, and no unlawful discrimination or victimisation.

This Code Policy sets out what employees must do to make sure all workplaces maintain such an environment.

## MUST

You must:

- Respect the dignity and human rights of colleagues and anyone else you come into contact with as part of your job
- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views.

This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement, which must be based on merit

Line Managers must:

- Make sure all employees' work is conducted on the basis of freely agreed and documented terms of employment, clearly understood by and made available to employees
- Make sure all employees have obtained employment with LIPTON Teas and Infusions without the employee having paid a recruitment fee or related cost directly or indirectly, as guided by the International Labour Organisation standards
- Make sure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or prevailing industry standards, and that remuneration terms established by legally binding collective agreements are implemented and kept to. Other than legally mandated deductions, all other deductions from wages require the express and written consent of the employee

- Respect employees' rights to form and join a legally recognised union of their choice or any other body representing their collective interests, and establish constructive dialogue and bargain in good faith with trade unions or representative bodies on employment conditions, labour management relations and matters of mutual concern, as far as possible while following national laws
- Comply with local legal requirements around short-term, casual or agency consultants
- Have a clear system of employee and management communication that lets employees consult and have an effective dialogue with management
- Provide transparent, fair and confidential procedures for employees to raise any concerns. These must enable employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or dignity

# Respect, dignity and fair treatment



## MUST NOT

You must not:

- Engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views
- Engage in any indirect behaviour which could be construed as sexual or other harassment or bullying, such as making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicit nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumours
- Work more than the regular and overtime hours allowed by the laws of the country where you are employed. Overtime work must always be on a voluntary basis

Line Managers must not:

- Use, or allow to be used, forced or compulsory or trafficked labour. We have a zero tolerance of forced labour
- Use child labour, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is higher
- When young workers are employed (insofar as short-term work experience schemes and work that forms part of an educational programme are legal), you must not allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling by depriving them of the opportunity to go to school

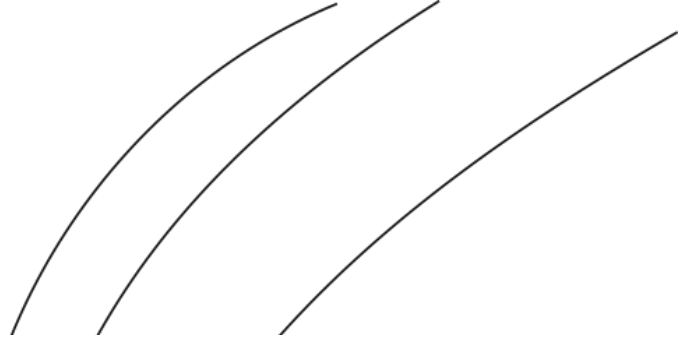




# Part 4

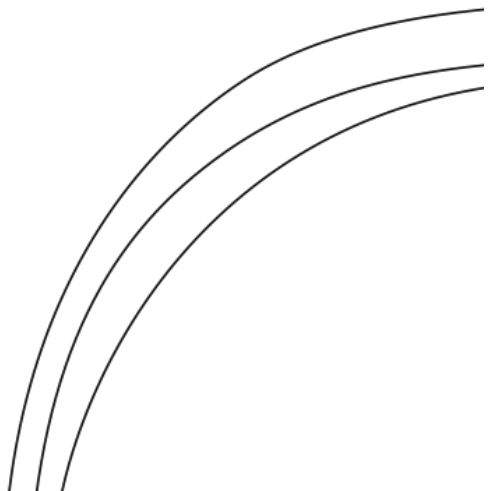
## Safeguarding Information

Protecting Information  
Competitors' Information  
Personal Data & Privacy  
Use of Information Technology



Information is essential to our success:  
it fuels our research, keeps us in touch with consumer  
needs, and helps us work effectively together.

But if used inappropriately,  
information can damage our business.



# Protecting *Information*

**Information is one of our most valuable assets. We're committed to safeguarding and protecting our information and any information entrusted to us.**

Information within LIPTON Teas and Infusions is held in many different formats, including on paper, electronically in documents or in IT applications and systems. Our requirements to protect information apply to all formats. We have data classification and information handling standards which define how information within LIPTON Teas and Infusions must be classified, handled and protected.

## MUST

When handling our information, you must:

- Understand the nature and classification of the information, as defined in our data and information standards. Understand and follow the handling requirements explained in these standards, and take personal responsibility for the proper use, circulation, retention, protection and disposal of our information

- Only share our information on a need-to-know basis, making sure only employees or others working for LIPTON Teas and Infusions, or authorised third parties, with a genuine business need, have access to the information
- Take care not to disclose information in public places, including taking all necessary steps to protect information in documents and on IT devices away from work
- Comply with the proper use of LIPTON Teas and Infusions Information Technology and only share LIPTON Teas and Infusions information using LIPTON Teas and Infusions approved Information Technology, in accordance with the Code Policy on Use of Information Technology
- Report any events you suspect could impact the security of LIPTON Teas and Infusions information by following the LIPTON Teas and Infusions reporting procedures. For example, information being shared with someone who was not authorised to view it; if you have received or responded to a suspicious email, text message, phone call, instant message or MFA prompt; or any other relevant event

## MUST NOT

You must not:

- Share LIPTON Teas and Infusions' information externally to third parties unless in line with our information classification and information handling standards
- Use our information for anything other than legitimate business purposes or as required by law.

Personal data relating to employees, consumers and other individuals is subject to specific laws and regulations in most countries and requires special handling. You'll find more information about the classification and protection requirements for personal and sensitive personal data in our Code Policy on Personal Data & Privacy

If you're not sure about how to handle any LIPTON Teas and Infusions information, restricted or otherwise, you must seek advice from your Line Manager.

# Competitors' information

**To promote fair competition, we gather and use competitors' information that's in the public domain, for example, from newspapers, the internet and company filings. This gives us valuable insights and helps us achieve our vision of growing a world of wellbeing and create value for all.**

This Code Policy outlines what employees and others working for LIPTON Teas and Infusions must do to legitimately obtain and use competitor information and at the same time respect the confidentiality of competitor's information.

We respect the confidential information of third parties, including competitors, suppliers and customers. Confidential information is information about another company that is not in the public domain, has value and could be used for commercial benefit. Accepting or using competitors' confidential information risks being a serious infringement of competition laws, trade secrets or intellectual property laws, leading to potential penalties for LIPTON Teas and Infusions and individuals. Competitor information includes all sorts of things, from marketing and financial information to intellectual property like 2D and 3D designs. If you're in any doubt, ask your Legal Business Partner.

## MUST

You must:

- Only gather and use competitors' information that's publicly available
- Make sure the information is from a legitimate source, and keep track of it
- Keep up-to-date with training and the latest policies on gathering competitor information
- Clearly record the sources of data in all communications, so its legitimacy is beyond doubt
- If you acquire a competitor's confidential information unintentionally, you must inform your Legal Business Partner straightaway

## MUST NOT

You must not:

- Try to obtain competitors' confidential information from new employees, or from anywhere else



# personal data privacy

**We respect the privacy of everyone - including employees and consumers. We respect people's personal data, including digital information we hold about them. We collect and use personal data in line with our values, applicable laws, and with respect for privacy as a human right.**

This Code Policy sets out what steps you must take to make sure personal data is handled correctly.

## MUST

When collecting, using or storing personal data, you must:

- Only collect data that's adequate and relevant, and use it solely for the purpose for which it's collected
- Be transparent with people about how their personal data is used, in line with our privacy notices
- Get consent from people in accordance with local law
- Keep personal data up-to-date, correcting inaccurate information when asked to, and respecting people's legal rights
- Keep personal data confidential and secure
- Act responsibly and ethically, upholding our values; always considering the risks to people in using their data; and taking steps to lower such risks

## MUST NOT

When collecting, using or storing personal data, you must not:

- Keep personal data for longer than needed to achieve our business goal, or meet minimum legal requirements
  - Transfer personal data outside the country it was collected in without advice from your Legal business partner, as there could be legal restrictions or requirements to do with the transfer
  - Collect or use personal data for anything not reasonably expected by consumers or employees
- If in doubt, you must seek advice from your Line Manager or Legal business partner.



# Use of *Information Technology*

**To do your job, you'll have access to LIPTON Teas and Infusions equipment and systems.**

**You're allowed to use LIPTON Teas and Infusions equipment for personal use as long as this doesn't cause material impact to LIPTON Teas and Infusions. Material impact includes excessive storage, network usage, mobile data usage, or voice calls which could negatively affect the performance of our working environment.**

All LIPTON Teas and Infusions business information processed by or stored on LIPTON Teas and Infusions or personal systems and equipment is not private and may be monitored, inspected or removed by LIPTON Teas and Infusions .

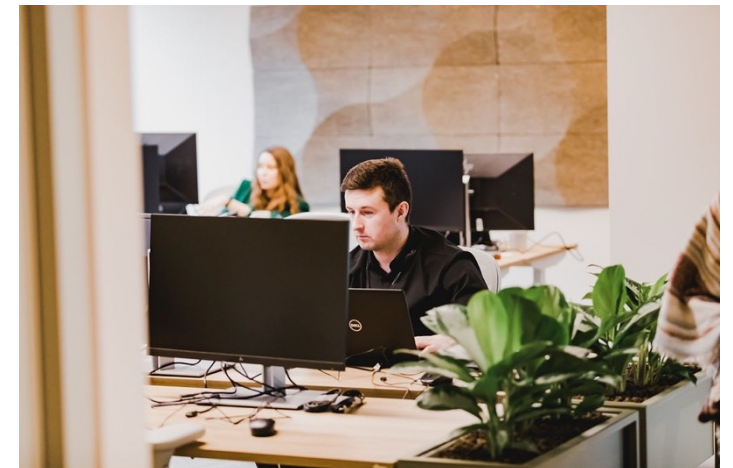
We may log, diagnose and assess activity on LIPTON Teas and Infusions systems and equipment to the extent permitted by law, to make sure this policy is being followed and our technical environment performs at its best.

## **MUST**

While using our systems and equipment, you must:

- Use it appropriately and protect it from damage, loss or theft
- Use a password or PIN to lock unattended LIPTON Teas and Infusions equipment, or any personal device used to access LIPTON Teas and Infusions information
- Immediately report the loss or theft of any LIPTON Teas and Infusions equipment, or any personal device used to access or store LIPTON Teas and Infusions Information, to our IT Service Desk
- Make sure any removable LIPTON Teas and Infusions IT equipment is secured when left in the office overnight, and is locked away or put out of sight when left unattended at home, in a hotel or in a vehicle. When travelling, always keep it with you

- Comply with copyright law and respect all applicable licenses for any graphics, documents, media and other materials stored on or accessed with our systems or equipment
- Follow the right IT request process to install any software or applications on LIPTON Teas and Infusions equipment



# Use of *Information Technology*

## MUST NOT

You must not:

- Try to disable, defeat, delete or circumvent our privileged access or anti-virus software or system logs
- Use LIPTON Teas and Infusions systems or equipment to access, store, send, post or publish material that:
  - Is pornographic, sexually explicit, indecent or obscene, or
  - Promotes violence, hatred, terrorism or intolerance, or
  - Is in breach of local, national or international laws
- Use LIPTON Teas and Infusions systems or equipment to defame, slander or lower the reputation of any person or entity, or their goods or services
- Expose LIPTON Teas and Infusions information by:
  - Using non-public LIPTON Teas and Infusions information for anything other than LIPTON Teas and Infusions business
  - Forwarding emails containing non-public LIPTON Teas and Infusions information to personal email accounts storing or synchronising LIPTON Teas and Infusions information from personal devices

- Sharing your LIPTON Teas and Infusions access credentials with anyone else, including work colleagues (unless formally approved by Information Security), friends and family.
- Using your LIPTON Teas and Infusions password for non-LIPTON Teas and Infusions IT systems
- Using your LIPTON Teas and Infusions password email address for non-business related websites or activity
- Deliberately accessing LIPTON Teas and Infusions systems information that's not meant for you
- Run or engage in any form of private business using LIPTON Teas and Infusions IT equipment
- Access LIPTON Teas and Infusions systems or information after leaving LIPTON Teas and Infusions' employment



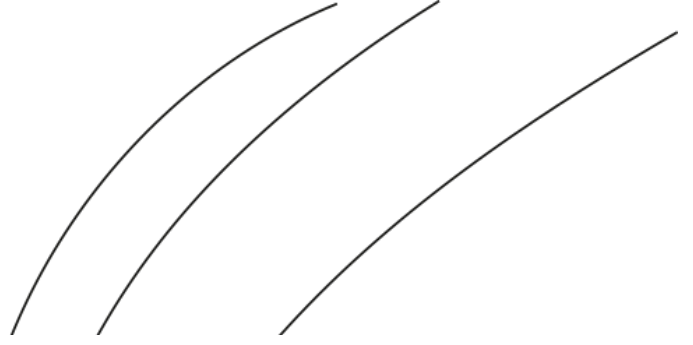


# Part 5

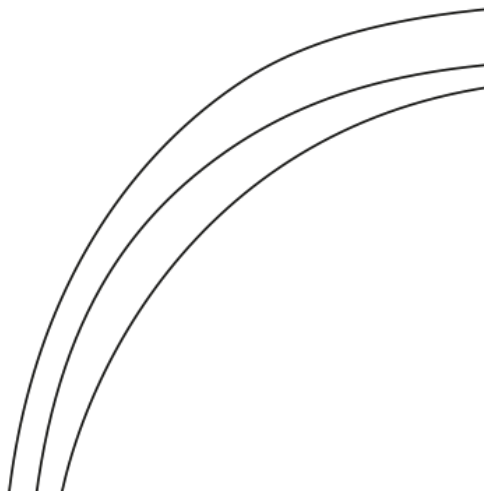
## Engaging externally

Responsible Marketing  
Responsible Sourcing & Business  
Partnering Fair Competition  
Contact with Government, Regulators &  
Non-governmental Organisations (NGOs)  
Political Activities & Political Donations  
External Communications - the Media,  
Investors & Analysts





In every part of our business, from innovation and farming to sales, we demonstrate the same high ethical standards when engaging with others externally as when dealing with each other



# Responsible *Marketing*

**We're committed to developing, producing, marketing and selling our products and services responsibly. We conduct marketing activities in line with societal expectations.**

This Code Policy sets out global minimum standards that apply to our marketing everywhere.

It covers, but isn't limited to: brand names, packaging and labelling; consumer planning and market research; trade advertising; sales materials; brand merchandising and sponsorship; all forms of advertising including television, radio, print, digital media, promotional activities and events; product placements; and 'advergaming' - whether created by us, our agencies, through crowdsourcing, or any other third parties.

## MUST

If you're involved in marketing activities, you must:

- Always respect applicable marketing laws
- Describe our products, services and their effects truthfully, accurately and transparently, with appropriate factual and, where relevant, nutritional information
- Make sure there's enough information for people to understand how to use our products and services

- Make sure our marketing claims are fully supported
- Comply with our principles and standards on marketing, including those with respect to children, women and social media
- Be mindful of the environmental implications of marketing activity, in such areas as new product development, marketing activation plans, packaging and content recycling

### Freedom of choice

Employees involved in LIPTON Teas and Infusions marketing must show respect for people who choose not to buy our products, and make sure there's enough information about our products for consumers to make informed choices.

### Taste and decency

Employees involved in LIPTON Teas and Infusions marketing must make sure it reflects and respects generally accepted standards of good taste and quality, in the context for which it's designed. It should show awareness of wider society, and be sensitive to different cultural, social, ethical and religious groups.

## MUST NOT

You must not:

- Alter images in such a way that marketing communications could be misleading
- Misuse technical data, or use scientific terms in such a way as to falsely suggest a claim has scientific validity
- Associate our products or services with themes, figures or images likely to cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age, disability or minority group
- Advertise in any media known for promoting violence, pornography or insulting behaviour

# Responsible *Sourcing* and *business partnering*

**We're committed to doing business in a way that improves the lives of workers, their communities and the environment. We need our suppliers and business partners to follow values and principles in line with our own.**

This Code Policy sets out responsibilities of employees who engage with third parties.

Our requirements for third parties are set out in the Responsible Sourcing Policy (RSP) for suppliers and in the Responsible Business Partner Policy (RBPP) for distributors, customers and other partners subject to the RBPP.

We could face legal action and reputational damage if third parties don't meet these requirements.

The RSP and RBPP outline the principles and requirements third parties must meet.

Teams responsible for setting the standards of these policies are Supply Chain for the RSP and Customer Development for the RBPP.

## MUST

If you contract or work with third parties, you must:

- Read and understand the RSP or RBPP policies and consult your Line Manager or the relevant teams if you have any questions
- Make sure all our third parties are subject to our RSP or RBPP policies and controls. This includes full, proper and timely onboarding, contracting and monitoring (including verification and remediation where needed)
- Make sure all our agreements with suppliers, distributors and customers, to the extent required by our internal controls, include contract clauses that specify the supplier must acknowledge it will follow our RSP or RBPP as a condition of working with us
- Inform your Line Manager and the relevant team if you know or suspect that third parties are not meeting RSP or RBPP requirements, or if they're not following contractual terms
- Make sure that any selection, shortlisting or tendering processes for new third parties consider their compliance with the RSP or RBPP

## MUST NOT

If you contract or work with third parties, you must not:

- Agree to any contractual changes or exclusions to do with the RBPP without prior written authorisation from the General Counsel Sales; and in respect of the RSP, without prior written authorisation from the General Counsel Supply Chain
- Keep dealing with third parties that have been declared as not compliant with the RSP or RBPP unless a dispensation or exemption is provided, or when they have been identified on our prohibited third parties list



# Fair competition

**Investigations by competition authorities could lead to large fines and costs, compensation claims by customers and competitors, and damage to our reputation and commercial relationships. Criminal sanctions for individuals might also apply.**

Competition laws prohibit:

- Anticompetitive agreements
- Sharing of commercially sensitive information between competitors, unless approved by Legal
- Certain restrictions imposed on or agreed with distributors and other customers; and
- Abuses of dominant market positions.

This Code Policy sets out what employees must do to make sure we uphold fair competition.

## **Co-operating with competition authorities**

We co-operate fully with the competition authorities, while consistently and robustly defending our legitimate interests. All contacts with competition authorities (including national courts) are co-ordinated by the Country Head and the General Counsel Sales and Competition. For more details, see the Code Policy on Contact with Government, Regulators & Non-Governmental Organisations (NGOs).

## **MUST**

Country and Function Heads must, with the support of the Global Legal Team, make sure that the requirements of competition law are understood by employees, contractors and agents operating in their categories, markets and functions, by providing appropriate documentation, communication and training, with tailored programmes for specific (in particular 'high risk') groups.

You must:

- Comply with competition law for all categories and markets you work in, and do all the relevant training
- Before taking part in a trade association or industry event, make sure all our mandatory requirements have been complied with; this also applies to less formal meetings or events that involve competitors, such as awards ceremonies or social contacts
- Object immediately if inappropriate topics are raised during any contact with competitors and leave immediately – and noticeably – if any inappropriate discussion continues
- Report incidents of inappropriate discussions immediately to your Legal Business Partner



# Fair competition

## MUST

- Promptly seek advice from your Legal Business Partner:
  - Whenever you need help applying the competition rules laid out here to any specific business situation, or in case of any doubt
  - In situations which might involve the exchange of information with a competitor
  - Before discussing joint purchasing arrangements, or production, research and development, or standardisation agreements with any competitor
  - When contemplating restrictions on the commercial activity of a customer or distributor
  - In situations where we might have a strong market position and our commercial practices could be perceived as unfair to customers or competitors
- Clearly record sources of competitor information in all communications and documents so their legitimacy is beyond doubt

## MUST NOT

We prohibit participation in cartels in all countries, even those that do not have competition law.

You must not:

- Take part in cartels
- Discuss, agree or share information about any of the following, directly or indirectly, with competitors, unless approved by your Line Manager and (if applicable) by your LBIO and LBIC:
  - The price or terms of sale for products or services - The price or terms to be asked of suppliers
  - The co-ordination or allocation of bids or quotes - Limitations on production or sales; or
  - The division or allocation of geographic markets, customers or product lines
- Boycott or refuse to deal with certain competitors, customers or suppliers without first seeking advice from your Line Manager and (if applicable) your LBIO and LBIC

- Impose restrictions on the commercial activity of a customer or a distributor without first seeking advice from your Line Manager and (if applicable) your LBIO and LBIC, including control of the resale price, the territory or channels in which a customer or distributor may resell our products and the extent to which they may sell competing products
- Where LIPTON Teas and Infusions has a strong market position, do anything to take unfair advantage of customers, or unfairly prevent competitors from entering, remaining or expanding in a market, e.g. by selling below cost; certain types of conditional rebates; exclusivity arrangements

# Contact with *Government, Regulators and Non-Governmental organisations (NGOs)*

**Any contact by employees or other representatives with government, legislators, regulators or NGOs must be done with honesty, integrity, openness and in compliance with local and international laws.**

This Code Policy explains how engagement with these authorities must take place. It doesn't cover purely personal matters, such as personal charitable donations or tax.

Governments, regulators and legislators includes bodies that may be:

- Global or international (e.g. United Nations)
- Regional (e.g. European Union, ASEAN, Asia Pacific Economic Cooperation)
- National
- Active at a local community level

Non-Governmental Organisations (NGOs) also operate at different levels, and their work includes social and consumer issues as well as environmental ones.

Contact with these organisations must only be made by authorised and appropriately trained people. This covers all forms of communications, whether formal, informal or social in relation to our business, including any kind of correspondence such as in-person, electronic, spoken or written.

## MUST

You must:

- Be appropriately trained and authorised by your Line Manager
- Be polite, open and clear in declaring your name, company, role, status and, for any enquiry or 'representation', the subject matter
- Take all reasonable steps to make sure of the truth and accuracy of your communication
- Keep a record of contacts and interactions with authorities at our own initiative
- Gain prior approval ahead of contacting officials to represent our legitimate interests as follows:
  - Global/international organisations = Chief Corporate Affairs and Communications Officer or Global Head of External Affairs, Global Head of Regulatory and Scientific Affairs, or Global Head of Sustainability Communications;
  - Regional organisations = Global Head of External Affairs or Regulatory and Scientific Affairs;
  - National or local organisations = National Head of Communications or External Affairs and / or Regulatory Affairs. If you don't have such departments in your location, you must get approval from the General Manager/Head of Operations or from the Global Head of Communications, External Affairs or Regulatory Affairs



# Contact with *Government, regulators and Non-Governmental organisations (NGOs)*

## MUST

- Where appropriate, get clearance on a standing basis as a requirement of your role. For example, some employees from regulatory and scientific affairs, communications and advocacy can get prior approval from the Country Lead, Finance Director or Tax Department and Group Controller for any contact relating to taxation, financial reporting, accounting, pension or legal matters
- Have prior approval from Regulatory and Scientific Affairs (which will in turn liaise with External Affairs and Legal) before any contact with regulators about our actual or planned use of products or ingredients
- Have prior approval from your local communications department before any contact with NGOs
- Know the latest procedures for responding to unannounced site inspections. These must include the nomination of appropriate colleagues to lead the response for each type of inspection

## MUST NOT

You must not:

- Try to slow down or block the collection of information, data, testimony or records by authorised investigators or officials
- Say or do anything that may, or may seem to, improperly influence decisions about LIPTON Teas and Infusions by any government, legislators, regulators or NGOs (see the Code Policies on Gifts & Hospitality and Anti-Bribery)



# Political *activities* and political *donations*

**We don't support or contribute to political parties or candidates. You can only offer support or contributions to political groups in a personal, private capacity.**

This Code Policy sets out we must manage business relationships with political groups.

## MUST

You must:

- Make sure any contributions towards, and support for, political parties are clearly personal, and give no impression of being connected to LIPTON Teas and Infusions
- Make sure any personal political support or contributions don't affect your performance or objectivity at work (see the Code Policy on Avoiding Conflicts of Interest)
- Make sure where you represent LIPTON Teas and Infusions in social or economic advisory groups set up by governments, your participation has had prior approval from the Chief Corporate Affairs and Communications Officer

Approval will only be given where the non-party-political nature of the activity has been publicly communicated as such by the advisory group; it supports our corporate vision; and the group includes representatives from a broad range of organisations, such as well-known peer companies, national charities, non-political think-tanks, research organisations or representatives of academia, or similar bodies

## MUST NOT

You must not:

- Create a conflict of interest through your involvement in the type of social or economic advisory groups mentioned above (see our Code Policy on Avoiding Conflicts of Interest)







# External Communications

## *Media, Investors and Analysts*

**Communication with investment communities - including shareholders, brokers and analysts - and the media must be managed carefully. Such communication has important legal requirements and demands specialist skills and experience. Only people with specific authorisation, training or briefing may communicate about LIPTON Teas and Infusions with investment communities or the media, or answer their questions.**

Our Chief Finance Officer, Chief Legal Officer and Chief Corporate Affairs and Communications Officer - on behalf of the LIPTON Teas and Infusions Leadership Team - are responsible for making sure we have the right disclosure procedures to comply with relevant laws and regulations.

This Code Policy outlines how communication with investment communities and the media must be done.

### MUST

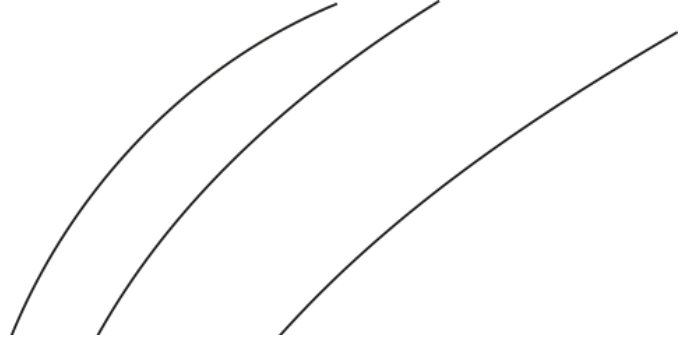
If you've been authorised to communicate with investment communities or the media by our Leadership Team, you must:

- Meet any conditions of their authorisation, such as constraints on when or with whom you can communicate
- Always check the content of any message with your authoriser, before sending it
- These rules also apply outside formal work settings, such as at external speaking engagements, training courses, seminars, trade association events or social occasions

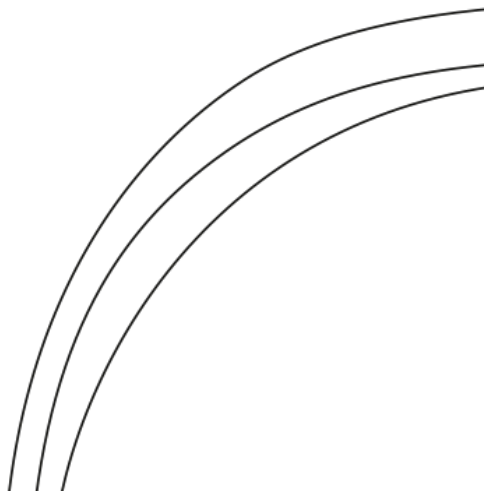
### MUST NOT

If you are not part of the Corporate Affairs and Communications function or a member of the LIPTON Teas and Infusions Leadership Team, you must not:

- Communicate with investment communities or the media, either on or off the record, without authorisation from one of these functions and appropriate training or briefing
- Reply to questions from investment communities or the media: all enquiries must be directed to the Corporate Affairs and Communications team
- Get drawn into conversations, answer any questions or provide any information or opinion
- Make any forward-looking financial statements or provide 'inside information'



Following these principles will help us achieve our  
commitment to *drive the whole industry upward*  
and *create value for all* - from farmers, to consumers,  
retailers, partners, shareholders,  
our people, and the planet





Thank you!

**LIPTON**  
*Teas and Infusions*

    
**T2** TAZO