



GREENE KING
BURY ST EDMUNDS

SUPPLIER CODE OF CONDUCT

At Greene King our purpose is 'we pour happiness into lives' which is underpinned by our Greene King values and behaviours.

Whether you are a supplier, consultant or business partner we ask that everyone who works on behalf of Greene King shares our commitment to our Supplier Code of Conduct. We expect everyone to **act with honesty, be respectful to and inclusive of others and take accountability for the relevant tasks associated with their role.**

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ABOUT US

Greene King is the country's leading pub company and brewer with c.2,600 pubs, restaurants and hotels across England, Wales and Scotland.

Founded in 1799 with offices in Bury St. Edmunds, Suffolk and Burton on Trent in Staffordshire we employ around 39,000 people across the group with four divisions: Greene King Pubs, Destination Brands, Partnership and Ventures, and Brewing & Brands.

- **Greene King Pubs** are located where people and communities come together; pubs enjoyed in cities, towns and villages throughout the country.
- **Destination Brands** is a mixture of food and drink-led brands including Hungry Horse, Farmhouse Inns, Chef & Brewer, Wacky Warehouse, and Flaming Grill.
- **Partnerships & Ventures** includes Pub Partners, which runs our tenanted and leased pubs business and Hive Franchise pubs, and our Ventures Brands which is made up of Metropolitan Pub Company, Hickory's, Hotels Group and Crafted Pubs.
- **Brewing & Brands** covers the brewing sides of the business. Quality ales are brewed at the Westgate brewery in Bury St Edmunds and the Belhaven Brewery in Dunbar. Our industry-leading portfolio includes Greene King IPA, Old Speckled Hen, Abbot Ale, Ice Breaker and Belhaven Best and our premium beers, Level Head and Flint Eye, brewed for the modern-day drinker.

OUR PURPOSE

At Greene King we are passionate about delivering our purpose to 'pour happiness into lives'.

That's for our customers, our team, our pub partners, our suppliers and the communities in which we live, operate and serve. We know we can make a real and positive difference to the communities and environment around us.

Our goal is to be the Pride of British Hospitality. To us this doesn't just mean delivering fantastic customer experiences and serving up award winning beers. It's more than that. It's about Greene King being a positive force for good and having a social purpose that threads through every part of our business. We are committed to working with supply partners who share these common values.

OUR CORE PRINCIPLES

Corporate integrity, responsible sourcing, managing our environmental impact and the safety and wellbeing of workers in the countries where we do business are of paramount importance to us at Greene King. These core principles are reflected in our Supplier Code of Conduct, which highlights the expectations we have of all our suppliers that provide us goods or services. This includes all workers and subcontractors that work for our suppliers. We expect all our suppliers to comply with both local legal requirements and the standards within this policy.

COMPLIANCE AND ETHICS

COMPLIANCE WITH LAWS AND REGULATIONS

In supplying goods or services to us, we expect you and your supply chain, in addition to complying with the standards set out in this Code, to comply with all applicable UK laws and regulations and any relevant voluntary codes of practice. This is in addition to, if applicable, adhering to the laws, regulations and relevant voluntary codes of practice of any other jurisdiction where you or your subcontractors or suppliers operate, including but not limited to the laws and regulations relating to issues addressed in this Code.

If there is a conflict between any applicable laws or regulations, the provisions of an agreement with us and the provisions of this Code, we would expect you to meet the most stringent standard.

BRIBERY, CORRUPTION AND RELATED MATTERS

We have a zero tolerance policy towards suppliers committing fraud, corruption or similar practices. We expect you to comply with all applicable laws and regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010). To that end, we do not expect you to accept, offer, promise, pay, permit or authorise:

- (a) bribes, facilitation payments, kickbacks or illegal political contributions;
- (b) money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
- (c) any other unlawful or improper payments or benefits.

We expect you to refrain from engaging in any business with us where there is an undisclosed conflict of interest and to advise us of any personal interests that might amount to a conflict of interest.

We expect you to have appropriate systems in place to manage conflicts of interest.

Any gifts or hospitality offered to our workers must be transparent and correctly recorded in your books and records, be appropriate in terms of type, value and frequency to the occasion and the position of the recipient, not be offered, provided, demanded or accepted with the expectation of any type of advantage, and must never give the appearance of dishonesty or inappropriateness.

UNFAIR BUSINESS PRACTICES

We expect you to comply with all applicable competition laws and those relating to market sharing, information sharing with competitors, price fixing and rigging bids.

We expect you to respect trade secrets and the intellectual property rights of others.

We expect you to handle our confidential information and that from third parties, such as competitors, customers, and sales partners, with care.

MONEY LAUNDERING AND THE FINANCING OF TERRORISM

We expect you not to facilitate money laundering or terrorism financing, directly or indirectly, and to follow up on suspicious business relationships, activities, and transactions immediately and report those to law enforcement authorities, when necessary.

GRIEVANCE MECHANISM

We expect you to implement a grievance mechanism appropriate for the size of the company, which may involve a complaint box or a sophisticated electronic tool and/or access to an external ombudsperson. Your grievance mechanism must ensure anonymous reporting and must guarantee no negative consequences for all who report a possible misconduct or a reasonable suspicion.

DATA PROTECTION AND INFORMATION SECURITY

We expect you to comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on our behalf and to notify us promptly of any data breaches involving data you hold or process on our behalf.

We expect you to have in place appropriate measures to:

- a) protect the integrity and confidentiality of information (including information belonging to or supplied by us) held on your systems (which include physical and online or electronic systems); and
- b) ensure that there is no unauthorised access of the information by third parties, including your suppliers.

EXPORT CONTROLS

We expect you to comply with all relevant national and international customs, export control and embargoes regulations that govern and restrict the free movement of goods.

PROCURING AND MANAGING SUPPLIERS

We expect you to carry out appropriate due diligence on suppliers that will form part of our upstream supply chain. This should include the prospective supplier's ability to meet the requirements and principles that are covered in this Code.

In your dealings with suppliers, we expect you to ensure they comply with applicable provisions of this Code, having due regard to the risk profile of the transaction, their ability to comply with those provisions and the consequences of failing to meet those requirements.

PEOPLE

SLAVERY, HUMAN TRAFFICKING AND FORCED OR COMPULSORY LABOUR

We expect you to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015 in any part of your supply chain. This includes ensuring that all work is conducted voluntarily and not under threat of any penalty or sanction, not retaining original identity documents of workers and not supporting or engaging or requiring any forced labour.

No workers should be expected to make deposits or financial guarantees, nor to incur debt through recruitment fees or fines and no physical or psychological pressure should be put on workers or their families. Workers should be free to leave the workplace after their shift, and to terminate their employment on reasonable notice.

CHILD LABOUR

We expect you to comply with all applicable minimum age regulations and local laws for employment and not to recruit or exploit children in any way.

HUMAN RIGHTS

We expect you to comply with all internationally recognised human rights including those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force.

NO DISCRIMINATION

We are an equal opportunities employer and we expect you to not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation or any other characteristic other than the worker's ability to perform the job subject to any accommodations required or permitted by law. Your workers should be free to lodge complaints with their superiors without fear of reprisal.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We expect you to respect, not discourage, and not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining. We expect you to ensure that employee representatives are not subject to discrimination and are given access to workers at the relevant workplace.

WORKING ENVIRONMENT

We expect you to provide a safe, healthy, and sanitary working environment and comply with UK health and safety laws and any other relevant laws where you operate. This includes appointing a person responsible for health and safety matters, taking adequate steps to prevent accidents and injuries, providing appropriate and effective personal protective equipment, ensuring access to fire exits and essential safety equipment, providing sufficient training of workers on how to work safely, ensuring access to clean, drinkable water and clean toilet facilities and ensuring access to emergency medical care.

WAGES, REMUNERATION AND WORKING HOURS

We expect you to compensate all workers with wages, including overtime premiums, benefits and paid leave that are in compliance with the requirements established by applicable laws, regulations and collective agreements. We expect you to ensure that overtime is voluntary and that you comply with all relevant laws and regulations regarding working hours.



ENVIRONMENT & SOCIAL

Man made climate change and protecting the environment is one of the biggest challenges the world has faced. Natural resources are becoming sparser in some regions, and flourishing ecosystems are increasingly threatened. Recognising that these are issues that affect us all and that can only be overcome through collaboration to make meaningful change, we have set ourselves the target to achieve Net Zero (no additional carbon emissions released into the atmosphere as a consequence of any of our operations) by 2040. We have also committed to reduce absolute scope 1 and 2 GHG (greenhouse gas) emissions by 50% by 2030 from a 2019 base year and to reduce absolute scope 3 GHG emissions by 50% within the same timeframe. In January 2023 these targets were approved by Science-based Targets Initiative (SBTi). Greene King is also Zero Waste to Landfill accredited by The Carbon Trust across our managed pubs, breweries and depots. We are a signatory of the Courtauld Commitment 2030, committing to reduce food waste by 50% by 2030 from our 2019 baseline.

CLIMATE RESPONSIBILITY

We expect you to ensure that:

- (a) your operations comply with all applicable environmental laws, including those relating to (but not limited to) climate change and carbon emissions, waste disposal, circular economy (reusing, recycling, repurposing materials from goods at their end of life), discharges to the environment, and the handling of hazardous and toxic materials;
- (b) the goods you manufacture (including the ingredients, components and any other inputs that you incorporate into your goods) comply with all applicable environmental laws;
- (c) your suppliers comply with the provisions of this paragraph in relation to their operations and the goods they manufacture;
- (d) you have a net zero transition plan which is available for Greene King to view and discuss with your sustainability department;
- (e) you sign up to Greene King Engage, Greene King's ESG supplier engagement platform, if requested, and respond to ESG related data requests from Greene King;
- (f) where appropriate, you have in place a suitable environmental management system for managing your environmental risks;
- (g) if your operations involve air emissions, these comply with all applicable legislation;
- (h) you work with us, when requested, to help us reduce our greenhouse gas emissions related to our operations, to minimise our negative impact on biodiversity, climate change and water scarcity, and on other appropriate climate and environment initiatives; and
- (i) where appropriate, you reduce your greenhouse gas emissions, related to your operations, and minimise your negative impact on biodiversity, climate change and water scarcity.

ENERGY USAGE

We expect you to ensure that you minimise energy usage through employing energy efficiency measures in your operations. To monitor energy usage and the effectiveness of implemented reduction actions it is necessary to measure energy usage over time. Where possible, we encourage you to ensure the electricity you purchase is 100% renewable.

WASTE

We expect you to implement practices to eliminate waste sent to landfill or burn to energy, adopting circular economy practices to ensure that waste produced in your operations, and the materials in your goods, where appropriate, can be reused, recycled or repurposed. All waste should be managed in a responsible manner that eliminates leaks and spills to the environment and complies with all applicable laws.

WATER

We expect you to employ practices to maximise water efficiency, ensuring you use only the minimum amount of water necessary in your operations. All water/waste water discharges should comply with all applicable legislation.

BIODIVERSITY

We expect our suppliers to protect natural ecosystems and not to supply products to Greene King from deforested land, nor to damage natural woodland and other natural ecosystems. We encourage you to actively seek opportunities to create positive impacts on biodiversity both related to your operations and those of your supply chains.

RESPONSIBLE SOURCING

No ingredients or products should be sourced through illegal or unethical practices. Raw materials / ingredients entering the supply chain should be extracted, produced and processed in a responsible manner.

SUPPORTING LOCAL COMMUNITIES

Pubs have been at the very heart of communities for generations, and so supporting charities and local communities is a core part of our sustainability strategy. We therefore look to work with suppliers who share this same ethos and can demonstrate how they give back to charitable organisations or the communities they serve.



YOUR COMMITMENT TO GREENE KING'S CODE OF CONDUCT

WHAT DOES THIS MEAN FOR YOU?

We expect you to have appropriate systems in place to ensure continuous compliance and to demonstrate such compliance. Any breach of this Code will allow us to terminate our relationship with you with immediate effect.

CERTIFYING COMPLIANCE AND AUDIT

We expect you to provide written confirmation to us at least once per year that:

- (a) you have appropriate systems in place to monitor your compliance with this Code; and
- (b) you are able to comply with this Code for the duration of your relationship with us.

We expect you to provide any additional third-party or self-certifications that are reasonably required to demonstrate compliance with all applicable laws and frameworks within 14 days of a written request from us.

WHISTLEBLOWING

Greene King is an organisation committed to conducting its business with honesty and integrity and we expect our suppliers to maintain similar high standards. This Code of Conduct contains general guidelines for conducting their business with the highest standards of ethics. We are committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in 'speaking up' and approaching your contact within Greene King in instances where you believe any wrongdoing is occurring, has occurred or is likely to occur, without being penalised in any way. This includes protecting you from any detriment or discrimination if you do report improper or illegal conduct taking place within the company. We know this may not always be possible and in situations where you may find it difficult to 'speak up' and raise sensitive workplace issues, you are encouraged to use our whistleblowing hotline, which is hosted by a third-party provider (NAVEX). You can share your concerns in complete confidence, rest assured that you can remain totally anonymous if you wish. You are encouraged to submit reports relating to violations of our Code of Conduct. NAVEX is contractually forbidden from supplying your details to us without your permission. If you wish to remain anonymous, do be careful when providing answers when making a report that you don't accidentally identify yourself, for instance by stating your relationship to the persons identified in the incident.

The NAVEX whistleblowing hotline can be reached at freephone 0800 249 4596.

SELF-MONITORING AND REPORTING BREACHES

We expect you to monitor your compliance with the Code and to report any breaches (actual or suspected) of this Code as soon as possible to us.

We expect you to not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.

GREENE KING'S RIGHTS UNDER THE CODE OF CONDUCT AUDIT RIGHTS

We reserve the right to conduct supplier audits at any time and expect you to provide reasonable assistance and documentation that we might request to support such audit.

BREACH, REMEDIATION AND TERMINATION

Where we become aware of a breach of this Code by you or your workers, we may either:

- (a) immediately terminate our business relationship with you (including any contracts); or
- (b) require you to produce a remediation plan specifying the actions that you will take that will lead to compliance with the Code, and present it to us within 60 days of being requested to do so. If you fail to produce the remediation plan within this timeframe or fail to implement it within a reasonable time, we may immediately terminate our business relationship with you (including any contracts).

UPDATING THIS CODE

We have the right to modify this Code from time to time on giving you at least 30 days' notice in writing (writing includes email).

DEFINITIONS

In this Code:

We/us means any company in the Greene King group.

You means any company, partnership or individual that provides goods or services to companies in the Greene King group.

Worker means any individual whom you employ, hire or engage, or otherwise use to conduct your business.



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