

Our Code of Ethics

\ Guided by Our Principles

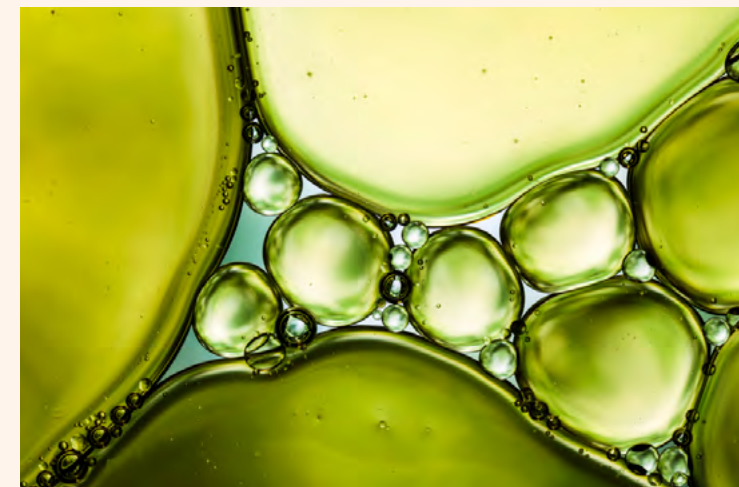
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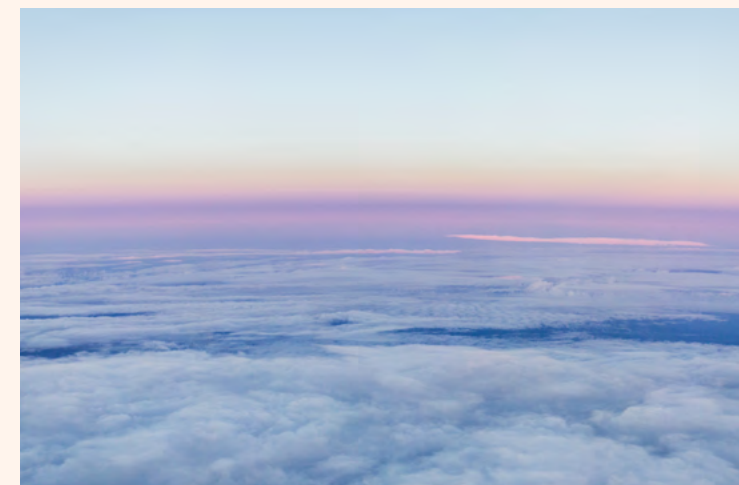
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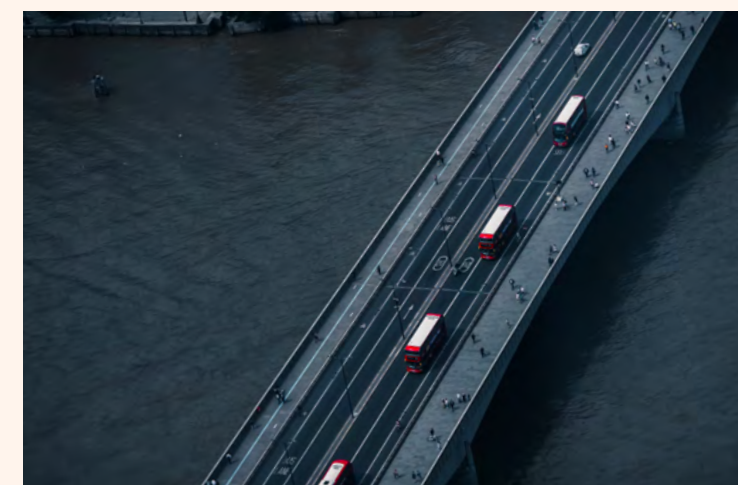
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If in doubt – speak up!



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Foreword

We do what is right, no matter what.

At Tate & Lyle, we are guided by our foundational principles of Safety, Integrity and Respect. We believe in doing what is right, no matter what. This Code of Ethics is a guide to help you make the right decision, with integrity, every time.

It can be tempting to 'be pragmatic', 'take short-cuts', be 'a little flexible'— and when things are good, such temptations are easy to ignore. But when the pressure is on and there are demanding targets to be met, we can sometimes be tempted to 'get there' by compromising our standards.

It is never worth it.

Most of the time we know instinctively what is right and what is not. Our general rule is, if something doesn't feel right, don't do it – and don't stand by while others do it either. We all have a responsibility to speak up and raise concerns, either to our managers, the Ethics and Compliance team, the Legal team or, if you don't feel you can talk to any of them, anonymously through Safecall. Suppliers and Customers are equally asked to speak up, either to their contact point at Tate & Lyle or through Safecall. No one will ever suffer from raising a concern in good faith.

Please read the Code carefully so you understand what is required of us all as employees or business partners of Tate & Lyle.

By doing this, we live by our principles and support our purpose of Transforming Lives through the Science of Food.

Nick Hampton Chief Executive



Introducing the code

Tate & Lyle is committed to doing business the right way. To help us, we have created this Code of Ethics, a set of guidelines that build on our foundational principles of Safety, Integrity and Respect to define the standards of behaviour we expect from everyone at Tate & Lyle, and those who work with us. In all cases, we comply with the laws of each country in which we do business.

Why do we need a Code of Ethics?

Our Code helps us make the right choices. This is important because a single poor decision can have far-reaching consequences across the Company. Our Code helps ensure we always do the right thing to protect our business, our reputation and ultimately, our future. It cannot cover every situation, but rather it gives guidance. Employees can find more details on the topic covered by the Code in our policies section on the intranet, or you can consult the Ethics and Compliance or Legal teams. Third parties can find more details in our Supplier Code of Conduct, and can contact their Tate & Lyle point of contact for more information.

Who is this Code for?

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

What does it mean for me?

Following our Code means obeying the law, acting with integrity, showing respect both internally and externally, building trust with all our stakeholders, and raising concerns if we believe something isn't right. Every one of us is responsible for behaving ethically and upholding the Company's reputation - that is why it is important we are all familiar with the Code and use it every day.

What part do managers play?

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

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

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

Delivering our purpose

Transforming Lives through the Science of Food

Never compromising on our principles

Safety

Integrity

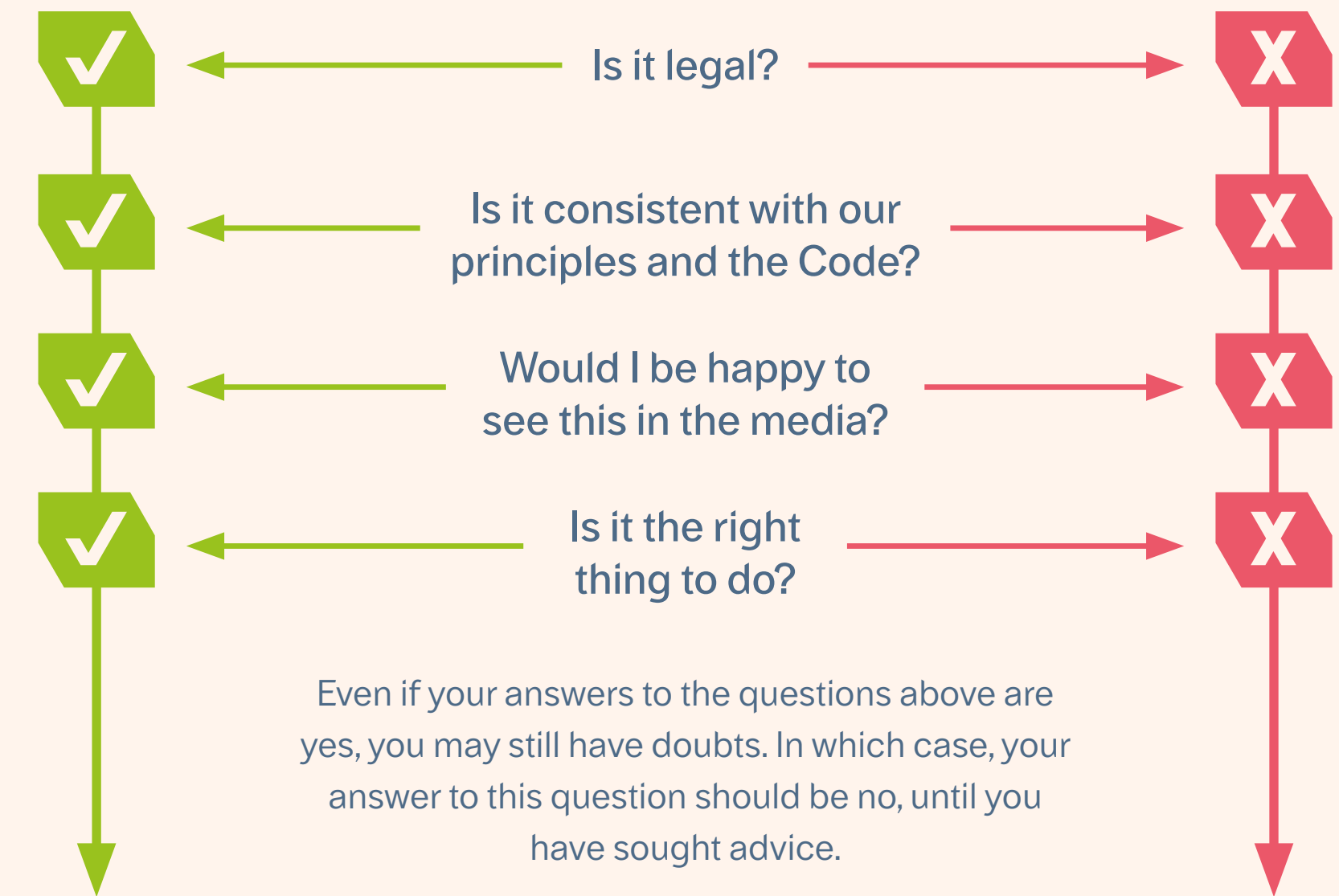
Respect

How to make an ethical decision

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

Don't forget you can always discuss your dilemma with your line manager, the Ethics and Compliance team or the Legal team, or if an external party, your Tate & Lyle point of contact.

Ask yourself...



Yes to all questions
Go ahead.
Or, if you still have questions, ask.

No/not sure
Before doing anything,
contact the Ethics and
Compliance or Legal teams.

Environment, health and safety

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

Guidance

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

Our commitment to EHS means we will not make, handle, use, transport, or dispose of any product or material unless we can do so safely and with proper regard for the impact on the environment. Doing so is a condition of employment at Tate & Lyle, so make sure you have read and understood the EHS procedures relevant to your job.

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



Have a question?

Contact your EHS manager or report a concern in the EHS Concern Reporting tool in Benchmark.

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

Find the links for how to contact Safecall on page 46.

Ethics in action...

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

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

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

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

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

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

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

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

Have a question?

Contact your EHS manager or report a concern in the EHS Concern Reporting tool in Benchmark.

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Workplace and human rights

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



Guidance

We expect everyone who works for or with Tate & Lyle to commit to these principles.

- We treat all employees and business partners with respect. That means making decisions about hiring, pay, benefits, promotion, training and discipline entirely on merit.
- We do not discriminate on the basis of gender, age, disability, marital status, pregnancy, sexual orientation, religion, ethnic or national origin, genetics, military status, or any other protected class.
- We do not tolerate harassment or bullying of any kind, or retaliation against anyone raising a concern in good faith.

- We offer pay and benefits at least equal to the relevant legal minimum of the countries in which we work.
- Our working hours reflect national and local regulations.
- We do not use child or forced labour, and we respect employees' rights of freedom of association, for example being members of a union or works council, and do not discriminate against those exercising their rights of association.
- If we find any breaches of these principles, we will take action.



Have a question?

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

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Ethics in action...

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

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

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

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

Q: My colleagues and I all feel bullied. **What should we do?**

A: You should speak up. We do not tolerate bullying and expect all managers to treat employees with respect. If necessary, speak directly to HR, the Ethics and Compliance team or call Safecall.



Have a question?

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

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Fraud and financial integrity

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



Guidance

Accuracy of financial information

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

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

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

This means:

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



Have a question?

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

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Buying and selling Tate & Lyle shares

If you buy or sell Tate & Lyle shares or encourage others to do so because of confidential information you know about, it is 'insider dealing' which is illegal. If you are on the 'clearance to deal' list because of your role then you will need to get permission before you buy or sell shares, and you may not be able to do so during certain periods (eg around the annual results – known as a 'closed period'). You can find out more in the share dealing rules section on our intranet.

Money laundering and tax evasion

Like every other law, we must comply with anti-money laundering laws. This means we will do

business with reputable customers involved in legitimate business activities, and will only accept funds from legitimate sources. We will also not do business in a way that helps customers, suppliers or other third parties evade tax.

Protecting against fraud

Fraud can happen in a number of ways: theft, giving false information for personal gain (or that could defraud the company), failure to disclose required information, the distortion, suppression or falsification of records or using your position to influence others to do any of these things on your behalf. At an individual level, fraud can include theft through false expense claims or other means,

for example overstating hours worked, or stealing company property. Fraud does not need to directly involve money, it can also stem from deliberately falsifying quality or other testing results that could lead to a harm to the company, a customer or a supplier. It's essential that we all guard against fraud, whatever form it takes.

If you suspect fraud, you must not investigate it yourself, but instead report it immediately to the Ethics and Compliance team, the Head of Internal Audit or to Safecall which will ensure it is investigated in the proper way.

Have a question?

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

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Ethics in action...

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

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

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

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

Q: A supplier has asked me to pay an individual bank account for the services provided by their company. **Can I comply with this request?**

A: No, we should only pay the company that provided services to us, as otherwise we may be helping the supplier evade taxes by not reporting revenues accurately.



Have a question?

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

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Bribery

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

Guidance

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

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

Always report any offer or request you feel uncomfortable with to our Ethics and Compliance or Legal teams. Similarly, always report any suspected bribery by a third party, whether or not Tate & Lyle is involved.



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Ethics in action...

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

A: Not without a thorough investigation. Any request for extra fees must be reviewed by our Ethics and Compliance or Legal teams.

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

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

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

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



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Gifts and hospitality

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



Guidance

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

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

Know your gift threshold

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



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Ethics in action...

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

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

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

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



Have a question?

Contact the Ethics and Compliance or Legal teams.

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International trade laws

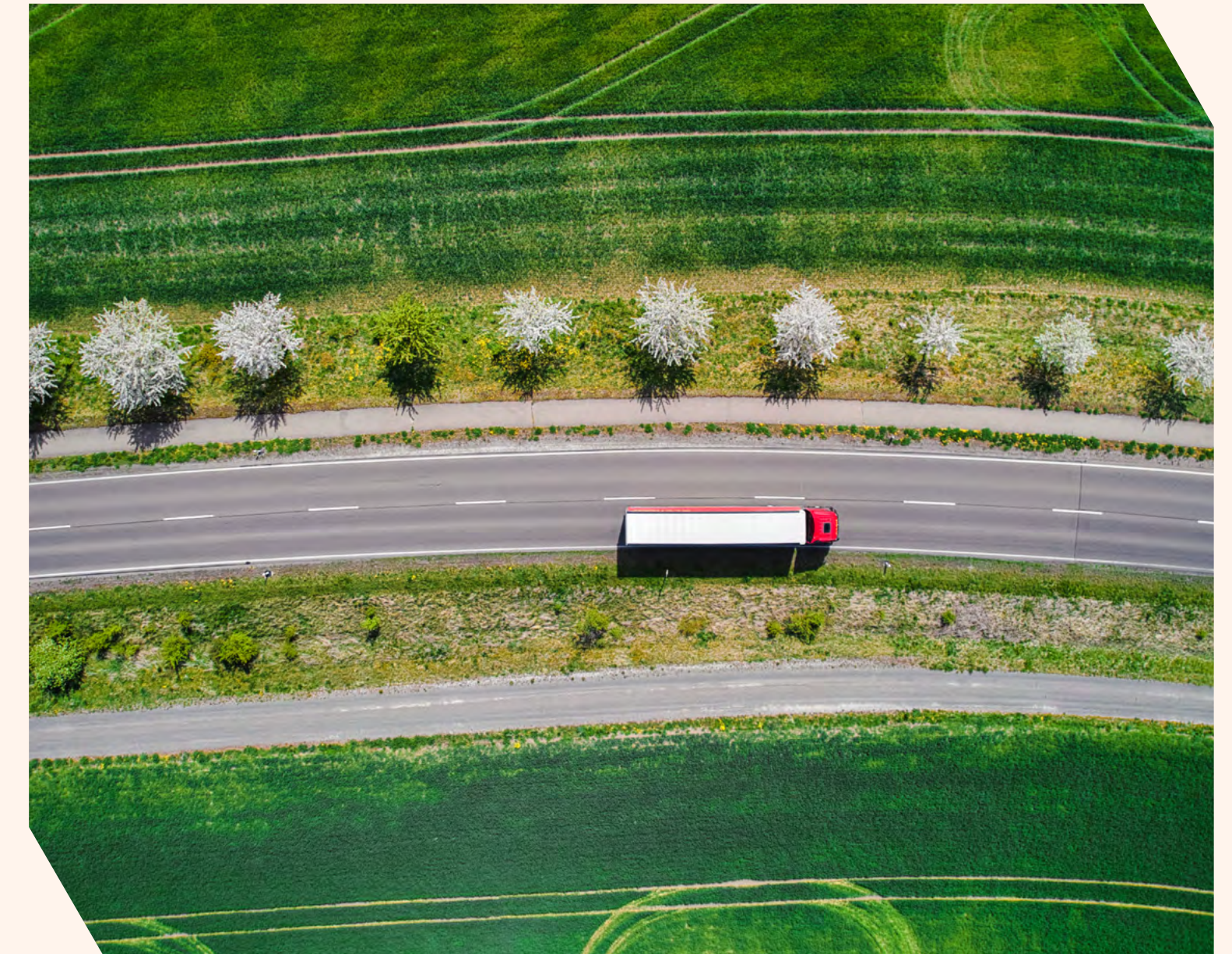
As a global company, it is essential that we comply with international trade regulations. Our ability to import and export products around the world is a privilege, not a right. So we are committed to complying with the laws and regulations in all the countries where we operate.

Guidance

Anyone who works for or with Tate & Lyle must stay alert and informed when involved in cross-border transactions. That means:

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

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



Have a question?

Contact the Ethics and Compliance team.

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Ethics in action...

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

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

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

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

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

A: You must report this to the Ethics and Compliance team who will review the request and determine next steps. Boycotts based on national origin, religion, ethnicity, or gender are widely prohibited by law.

Have a question?

Contact the Ethics and Compliance team.

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Conflicts of interest

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

Guidance

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

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



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Ethics in action...

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

A: Yes, but it's essential you disclose the relationship. If you personally are responsible for finding the supplier, you must either exclude your cousin or, if you truly believe that he would be the best choice, raise the issue with your line manager then remove yourself from the decision-making process.

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

What should I do?

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



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Company resources

Tate & Lyle employees are all responsible for protecting Company property and resources from damage, theft or misuse. Similarly, it is essential we all use Company equipment and communication systems responsibly, and in a way that does not reflect badly on Tate & Lyle.



Guidance

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

It is important we always use Company property and resources in a way that is reasonable, responsible and respectful. We must never use Company resources in a way that is unlawful, unethical or contrary to Company policy. We may use Company equipment for personal reasons occasionally, as long as it does not reduce the value of Tate & Lyle's assets, incur additional costs,

place Company information at risk, interfere with productivity or place Tate & Lyle at risk of liability.

And, if we are entrusted with resources and property belonging to other organisations, we should be just as responsible and respectful as we are with Tate & Lyle's.



Have a question?

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

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Ethics in action...

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

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

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

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

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

A: Although you're at home, by using your Tate & Lyle laptop, you're effectively 'inside the Company', so it depends what you're watching. Remember that pirated content is illegal, and some content may be considered offensive, whether or not it is legal.



Have a question?

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

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Confidentiality and privacy

In business, as in life, a reputation for honesty, reliability and discretion is hard to win but easy to lose. That's why as a company we are committed to protecting the confidentiality and privacy of both our own information, and that of other organisations we work with. We comply with all applicable laws and regulations protecting confidential information, including laws on the protection of personal data and the protection of the right to privacy.

Guidance

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

It is important we only share such information with colleagues who have a legitimate need to know. We must never share confidential information with anyone outside Tate & Lyle unless we have taken the necessary steps to protect it. This may include ensuring the other person has signed a

non-disclosure agreement, or obtaining consent of the owner of the confidential information.

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



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Ethics in action...

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

A: Definitely not. All Tate & Lyle employees are prohibited from using confidential information from their previous employers. Please contact the Ethics and Compliance or Legal teams to let them know you have this information.

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

A: The right thing to do would be to stop the conversation, saying politely that it would be better to have this kind of conversation in a more private place. We should always be aware of our surroundings when discussing Tate & Lyle business in public.



Have a question?

Contact the Ethics and Compliance or Legal teams.

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Find the links for how to contact Safecall on page 46.

Food safety and quality

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

Guidance

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

We also aim to develop a deep understanding of our customers' needs and expectations, and we manage these with clear and open communication. We react to customer concerns in a timely and effective way, dealing with any issues quickly and politely.

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



Have a question?

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

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

Find the links for how to contact Safecall on page 46.

Ethics in action...

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

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

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

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



Have a question?

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

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Competition

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

Guidance

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

Always treat customers in a straightforward manner that respects their independence. Never discuss or agree any aspects of pricing, territories, markets, contracts, production, customers, inventory, costs or capacity with competitors. Never enter into agreements with suppliers or customers that

could restrict competition. Never interfere with our distributors' freedom to set their resale prices.

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



Have a question?

Contact the Legal or Ethics and Compliance teams.

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Ethics in action...

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

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

Q: A representative from a competitor began discussing their pricing strategy at a trade association meeting. I told them I thought it was inappropriate and left the meeting.

Did I do the right thing?

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

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

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



Have a question?

Contact the Legal or Ethics and Compliance teams.

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Community involvement

Living by our principles is also about supporting the communities where our employees live and work. Building stronger and healthier communities is not only the right thing for us to do, it also positively contributes to the long-term sustainability and reputation of our business.



Guidance

Tate & Lyle has a long and proud history of investing in our communities and playing a positive role in society. For more than 150 years, we have been improving lives across the world.

We encourage our people to become actively involved in their communities by volunteering and participating in local projects and charitable activities. However, you need to make sure that outside activities do not interfere with the performance of your job, or create a conflict of interest. All Company charitable contributions need to comply with applicable laws, as well as being in line with our policy on corporate giving. You should seek approval before donating Company funds, or making contributions in Tate & Lyle's name.



Have a question?

Contact the Corporate Affairs
or Ethics and Compliance teams.

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Find the links for how to contact Safecall on page 46.

Ethics in action...

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

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

Q: I regularly volunteer at a local food bank. Given Tate & Lyle supports a number of organisations related to food and nutrition, **can I tell the food bank that my service is being provided on behalf of Tate & Lyle?**

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



Have a question?

Contact the Corporate Affairs
or Ethics and Compliance teams.

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Political involvement and contributions

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

Guidance

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

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

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



Have a question?

Contact the Corporate Affairs or Ethics and Compliance teams.

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Ethics in action...

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

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

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

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



Have a question?

Contact the Corporate Affairs or Ethics and Compliance teams.

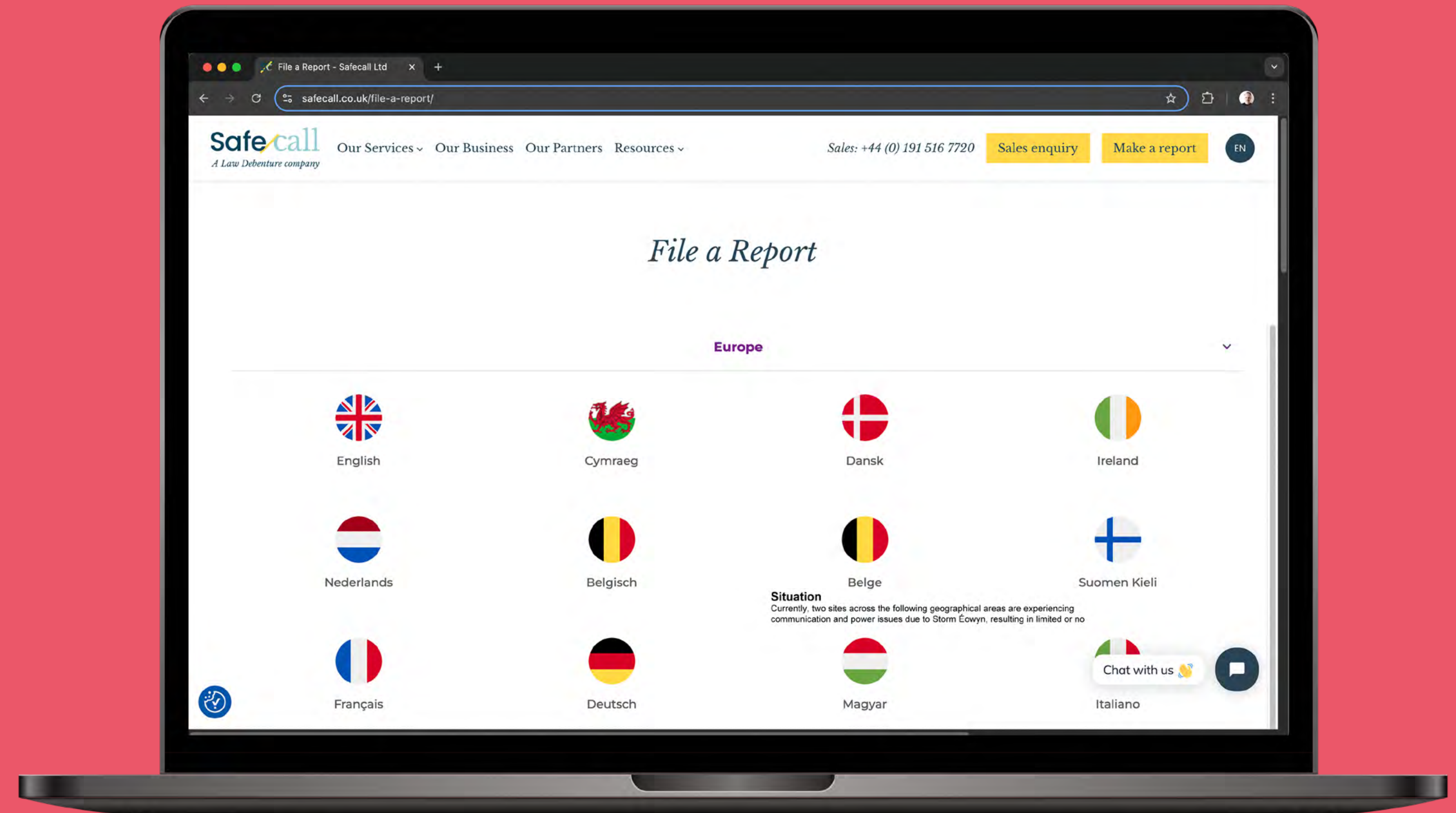
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If in doubt – speak up!

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

For whatever reason, you may find this too difficult, or you may want to speak to someone outside Tate & Lyle. This is why we have Safecall, an external, independent company which provides a confidential service, available 24 hours a day. Safecall is staffed by professional investigators who speak a wide range of languages. The investigators will listen to your concern in your language and make sure it is dealt with appropriately by reporting your concern straight to our Head of Ethics and Compliance, while protecting your anonymity.



Safecall

Safecall numbers [click here](#)
File an online report [click here](#)
Email: info@safecall.co.uk

Contacts

If you have any questions or concerns about the topics covered in this Code, please email us in the first instance, via our dedicated ethics and compliance inbox:

ethicsandcompliance@tateandlyle.com

Alternatively, you can also contact a member of the Legal team.

Have you read this?