This is the way we work together

Our Code of Conduct
Dear colleagues,
At Lamb Weston / Meijer we have a clear mission:
“Serving our world with potato solutions”.

It is our ambition to be the preferred solution and service leader for our customers. We realise this by delivering our products and services on a daily basis, with consistent quality, and by spotting and creating opportunities for our business.

Our employees, suppliers, customers and other business partners have trust and confidence in our company, in the way we behave and drive customer intimacy and bring our operational principles and company values into practice. The success and reputation of Lamb Weston / Meijer depends on these behaviours, every day.

That’s where this Code of Conduct comes in. It is a guiding document for all of us, where the ethics and behaviours belonging to our way of working are described.

Keep this Code with these principles and values in mind whenever you interact on behalf of Lamb Weston / Meijer. It gives you guidance in how to work with colleagues, and also with our business partners.

If you have any questions, please don’t hesitate to ask.

With your support, I am confident that our company will continue to earn the trust and confidence of all our stakeholders. Together we hold the company’s reputation for honesty and integrity in our hands.

Thank you for joining me in this effort.

Bas Alblas
Chief Executive Officer.
Our Code of Conduct
OVERSIGHT AND ADMINISTRATION

Our Code of Conduct has been approved by our Senior Leadership Team (‘SLT’), our owners and representation of workers. The overall administration is handled by our Chief Financial Officer (CFO) and our HR & Communication Director.

APPLICABILITY

Our Code of Conduct applies to everyone within Lamb Weston / Meijer V.O.F. and its subsidiaries (hereinafter together referred to as ‘LW/M’), no matter where they work or what their jobs are, whether they are employed by us or working in our company as a consultant, trainee, temp/agency worker, intern or even volunteer (referred to as “colleagues” for the purpose of this Code).

LW/M expects its suppliers, including vendors, advisors and consulting firms, contractors and other service providers (together referred to as “service providers”), to act ethically and in a manner consistent with our Code of Conduct. If you hire a service provider on behalf of LW/M, you must take reasonable steps to ensure that this service provider has a reputation for integrity and ethical conduct, is aware of this Code of Conduct, and is acting in a manner that reflects the highest ethical standards.

LW/M conducts business in a number of countries. As a result, our operations are subject to many different laws, customs and cultures. LW/M is committed to the highest ethical standards in the conduct of its business worldwide, both in terms of complying with applicable law and upholding the standards set forth in our Code of Conduct.

Our international presence continues to grow, and the laws and regulations around the world affecting LW/M become more complex each year. To the extent practicable, this Code of Conduct will be modified to conform to changes in laws and customs. If any requirement of our Code of Conduct violates or conflicts with the laws of a particular country, the requirement in the Code of Conduct shall not apply in that country – the law always comes first. If you have questions about the laws that apply to your work activities and the answer is not available within your department, contact LW/M’s Legal Department for guidance.
This Code of Conduct is intended to ensure LW/M operates in compliance with all laws and regulations applicable to its business. This Code reinforces existing obligations under the law, it is not intended to create any additional obligations.

Our Code of Conduct is not a contract, and LW/M has the right to amend, modify or revise this Code of Conduct at any time.

OTHER IMPORTANT POLICIES
Our Code of Conduct is the cornerstone of our commitment to integrity, but it is not intended to describe every situation, law or policy that may apply. LW/M has specific regulations and policies relating to travel and entertainment, confidentiality, electronic communications, use of LW/M hardware and other matters. These may be contained in other documents, (for example a Collective Labour Agreement applicable in The Netherlands) and the rules may vary per country or work location (according to local circumstances and legislation). Most policies are available on the intranet, policies that apply to a specific category of employees or to certain activities, are communicated to the employees for whom they are relevant. As these internal policies may change from time to time, it is important that you review the regulations and policies applicable to your job/function (on line) periodically. Substantial changes in the Code of Conduct are actively communicated via the common communication channels. If changes need consent, we will request the Workers Council for approval.

OUR SUPPLIERS, AND CUSTOMERS, CODES OF CONDUCT
In dealing with our suppliers and customers, you should conduct yourself and our business in an appropriate manner in order to avoid violations of our suppliers’ and customers’ codes of conduct and policies. You are expected to take the personal initiative necessary to know, understand, and honour those codes of conducts and policies that apply to our working relationship with them.

In addition to this LW/M Code of Conduct and codes of conduct of
our customers, we have committed ourselves at European Union level to the ‘Principles of Good Practice’ developed and published by the Fair Trading Practices Initiative (see www.supplychaininitiative.eu/).

Questions about these principles can be directed to the Legal & Insurance Department.
THESE ARE THE PRINCIPLES OF GOOD PRACTICE:
Contracting parties shall act in strict compliance with applicable laws, including competition law.

General Principles:

A. CONSUMERS:
Contracting parties should always take into account consumer interests and the overall sustainability of the supply chain in their B2B relations. Contracting parties should ensure maximum efficiency and optimisation of resources in the distribution of goods throughout the supply chain.

B. FREEDOM OF CONTRACT:
Contracting parties are independent economic entities, respecting each other’s rights to set their own strategy and management policy, including the freedom to determine independently whether to engage or not in any agreement.

C. FAIR DEALING:
Contracting parties should deal with each other responsibly, in good faith and with professional diligence.

Specific guidelines:

1. WRITTEN AGREEMENTS:
Agreements should be in writing, unless impracticable or where oral agreements are mutually acceptable and convenient. They should be clear and transparent, and cover as many relevant and foreseeable elements as possible, including rights and procedures of termination.

2. PREDICTABILITY:
Unilateral change to contract terms shall not take place unless this possibility and its circumstances and conditions have been agreed in advance. The agreements should outline the process for each party to discuss with the other any changes necessary for the implementation of the agreement or due to unforeseeable circumstances, as provided in the agreement.

3. COMPLIANCE:
Agreements must be complied with.

4. INFORMATION:
Where information is exchanged, this shall be done in strict compliance with competition and other applicable
laws, and the parties should take reasonable care to ensure that the information supplied is correct and not misleading.

5. CONFIDENTIALITY:
Confidentiality of information must be respected unless the information is already public or has been independently obtained by the receiving party lawfully and in good faith. Confidential information shall be used by the recipient party only for the purpose for which it was communicated.

6. RESPONSIBILITY FOR RISK:
All contracting parties in the supply chain should bear their own appropriate entrepreneurial risks.

7. JUSTIFIABLE REQUEST:
A contracting party shall not apply threats in order to obtain an unjustified advantage or to transfer an unjustified cost.

CONTACT
If you have any questions relating the contents of “Our Code of Conduct”, please contact the Legal department or the HR & Communication department.
Dealing with colleagues
INTRODUCTORY NOTE
Depending on your work location, specific policies and procedures may apply with respect to behaviour between colleagues. These can be accessed through the intranet or the HR & Communication department. There you can also find details of specifically appointed persons within the organisation who can be approached on a confidential basis.

VALUING DIVERSITY & INCLUSION
LW/M conducts business in a global environment reflecting the diversity among our employees, customers, consumers, suppliers, vendors, shareholders and communities. We understand and appreciate the value that diversity contributes to LW/M and to the communities in which we live and work. Mutual respect is a core value of LW/M, and all employees and other persons engaged by us have a responsibility to act accordingly.

EQUAL OPPORTUNITY EMPLOYMENT
LW/M does not unlawfully discriminate against any employee or applicant for employment because of sex, race, colour, religion, ethnic or national origin, gender, sexual orientation, gender identity or expression, age, pregnancy, leave status, disability, veteran status, and/or any other characteristic or status protected by law. Each LW/M employee must take any appropriate action necessary to ensure that all employment decisions are made based on legitimate business reasons rather than any irrelevant personal characteristic.

Everyone within LW/M has the duty to try and prevent or eliminate abuse whenever they should be found to exist. LW/M insists that only objective job-related requirements and procedures shall be used to make decisions with regard to recruitment, employment, promotion, transfer, discipline (including termination of employment), compensation, benefits, demotion, dismissal, training and educational programs, rather than irrelevant personal characteristics.

PROHIBITION OF HARASSMENT/ BULLYING
LW/M is committed to providing a non-discriminatory work environment, free of any type of harassment and bullying. We will not tolerate harassment of anyone by anyone, including executives, officers, directors,
managers, co-workers, vendors or customers.

Harassment (including, but not limited to, conduct of a sexual nature) consists of unwelcome conduct, whether verbal, written or physical, that is based upon a person’s protected status, such as sex, race, colour, religion, ethnic or national origin, gender, sexual orientation, gender identity or expression, age, pregnancy, leave status, disability, and/or any other characteristic or status protected by applicable law.

Forms of harassment could include but are not limited to:

1) verbal harassment, such as derogatory comments or jokes;

2) physical harassment, such as unnecessary or offensive touching; and

3) visual harassment, such as derogatory or offensive posters, cards, cartoons, graffiti, drawings, notes, emails, texts or other messages, or gestures.

Sexual harassment, such as unwelcome sexual advances, requests for sexual favours and other physical, written or verbal behaviour based on gender is prohibited.

Forms of sexual harassment are:

1) submission to the conduct is an explicit or implicit term or condition of employment;

2) submission to or rejection of the conduct is used as the basis for or influences an employment decision; or

3) the conduct has the purpose or effect of unreasonably interfering with an individual’s work performance, subjecting an individual to any detriment, or creating an intimidating, hostile or offensive working environment.

WORKPLACE SAFETY AND SECURITY
LW/M is committed to providing a safe and secure work environment that complies with all relevant legal requirements regarding health, safety and security. Each employee is responsible for observing the safety and security regulations and policies that apply to his or her job. Employees
are also responsible for taking precautions necessary to protect themselves and their co-workers, including immediately reporting (near) accidents, injuries and unsafe or threatening practices or conditions. Appropriate action will be taken to correct known unsafe or threatening practices or conditions.

LW/M will not tolerate any threatening or hostile behaviour in the workplace. Employees must not engage in any assaults, hostile physical contact or intimidation, fighting, verbal, non-verbal, or written threats or physical harm or violence whilst on company property or on company business. With the exception of persons officially authorised, nobody may carry any kind of weapon or object expected to cause harm to another person.

**DRUGS AND ALCOHOL**

LW/M requires a drug- and alcohol-free work environment. Improper use of alcohol or drugs or any other harmful and/or controlled substances adversely affects job performance, can risk the safety of employees and others and is therefore strictly forbidden.

LW/M employees may not work or report to work while improperly impaired by alcohol, illegal drugs or any other harmful and/or narcotics. Possessing, selling, using distributing or offering others any illegal drugs is prohibited. Alcohol is forbidden on all premises, employees may not consume alcohol when it may impair their ability to perform job duties, endanger others or reflect adversely on the reputation of LW/M or its employees.
COMPANY TIME AND COMPANY PROPERTY
You should make the best use of your time and that of your co-workers. When reporting your hours worked (if applicable), vacation or occasional leave hours, you must do so truthfully and accurately. You need to handle all LW/M’s property with care. Careless, inefficient or illegal use of company property is prohibited at LW/M. All records you create as part of your work for LW/M are LW/M’s property.

It is LW/M’s desire that its employees be lawfully compensated for their work. Consequently, LW/M complies with all applicable wage and working time regulations. Employees are expected to ask questions about their pay in case clarification is needed.

FORCED LABOUR
LW/M prohibits forced labour, including human trafficking and slavery. Involuntary labour and / or labour under threat of sanctions is prohibited. In addition, all employees of LW/M must comply with all applicable child labour laws. LW/M requires suppliers to adhere to the same standards within their operations and ensure that these standards are complied with throughout the supply chain.

CONTACT
If you have any questions relating “Dealing with colleagues”, please contact your manager, the HR & Communication Department or one of the confidential advisors.
Stay alert!
Dealing with our customers
PRODUCT QUALITY, SAFETY AND SECURITY
LW/M has established a good reputation with the production of wholesome, safe food products. Our reputation is built on significant research and development and a commitment to utilising safe ingredients in clean and secure environments. We owe this reputation to our highly motivated employees. We can only maintain and further improve our reputation if we all contribute to product safety and security, not only by complying with all laws and good manufacturing practices, but also by following our company standards that, in many cases, go beyond the regulatory requirements. Any deviations from these principles or threats, large or small, should be reported to the QA manager.

Product innovation is crucial to set our products apart, to improve the quality and enhance food safety and security. We protect our product and packaging innovations including through registration of intellectual property. Employees of LW/M must also respect the intellectual property belonging to others.

ADVERTISING AND PACKAGING
LW/M prides itself on its many products and is committed to promoting its products in ways that enhance its reputation and educate consumers. Advertising, packaging and promotions must not misstate facts or provide misleading impressions. Claims regarding our products, including claims that favourably compare our products with those of competitors, shall be accurate, complete and fully substantiated. LW/M believes in the responsible marketing of its products to all audiences, and we commit to advertising only products that meet relevant nutritional guidelines.

SELLING OUR PRODUCTS
In selling our products, we actively look for opportunities - and seize them where we can, but always acting honestly. The marketing of our products is based on quality, brand and label recognition, fair pricing, promotional programs and honest advertising practices. Employees should not make false or misleading claims about our products or a competitor’s products.
Offering or accepting bribes or kickbacks to secure business is unacceptable at LW/M. It is also illegal under several laws to which we are bound (among which the US Foreign Corrupt Practices Act, the British Anti-Bribery Act as well as comparable laws of other countries). Offering gifts or gratuities to customers or suppliers that are not reasonable complements to a business relationship is prohibited. Offering reasonable and lawful gifts (generally under EUR 100, but this may vary by locality) or entertainment to customers or suppliers may be acceptable when dealing with non-governmental customers and must be in compliance with any code of conduct of the customer or supplier.

CONTACT
If you have any questions relating “Dealing with customers”, please contact your manager.
Dealing with our suppliers
RESPONSIBLE INTERACTIONS WITH SUPPLIERS

LW/M receives competitive and fair value from its suppliers by maintaining its objectivity and building supplier relationships based on integrity and trust. As a responsible company representative, you must select suppliers that are best able to meet our business needs in terms of quality, costs, delivery and innovation. Incentives or participation in any activities that may improperly influence or appear to influence your business judgment, should not be considered or accepted. You should ensure that personal or family relationships do not influence, or appear to influence, objective purchasing decisions.

The only reason to accept business amenities from or participate in events with suppliers is to develop and strengthen LW/M’s business relationships with suppliers or partners.

ENTERTAINMENT AND EVENTS

You may accept customary business amenities, such as meals and entertainment, provided the expenses involved are reasonable and not prohibited by law or known supplier business practices. Reasonable expenses for meals are defined in the LW/M Travel and Entertainment Policy. Acceptance and payment of meals and entertainment should be reciprocal in nature. Entertainment should be limited to events of a reasonable cost. As a guideline, entertainment expenses up to EUR 100 are considered reasonable. Supplier representatives must participate and be in attendance when you participate in such events.

GIFTS

You may not accept or solicit gifts, including money, gift certificates, prizes (including supplier event prizes), awards, loans or anything other than items of nominal value from any supplier. You may accept a gift of low value or supplier logo merchandise, such as an advertising novelty, only when it is customarily offered to others having a similar relationship with the supplier. Gifts valued at less than EUR 25 are considered nominal. Gifts that cannot be received by LW/M employees must not be received indirectly either, for example through an officer, employee, family or friends, agent, broker, trade association, consultant or other third party.
You must not solicit any donation or contribution from a supplier.

If directly or publicly rejecting a gift or prize would be insulting to the supplier and/or counterproductive to the supplier relationship, the gift or prize may be received and be handed over to the HR & Communications department.

For all gifts or prizes in excess of this policy, management will make appropriate arrangements to return, dispose of or donate the gift or prize to charity in the supplier’s name and remind the supplier of LW/M’s gift policy.

**COMPETITIVE INFORMATION**

Information about competitors, customers and suppliers is a valuable asset in the highly competitive markets in which LW/M operates. While it is entirely appropriate for LW/M to gather competitive information, it should be done properly and in accordance with all applicable legal requirements. It can collect competitive information from public sources, published surveys and appropriate dealings with customers.

LW/M prohibits the misappropriation of a competitor’s proprietary information, the inducement of disclosures by a competitor’s past or present employees in violation of contractual commitments and any improper agreements with competitors to exchange competitive information.

**CONTACT**

For questions, authorizations and/or approvals on “Entertainment and Events” and “Gifts”, please contact the HR & Communications department or the Legal department.

Other questions should be directed to your manager.
Dealing with the marketplace
BUSINESS TRANSACTIONS AND MAINTAINING PROPER BUSINESS RECORDS

The accurate recording of financial information is critical to LW/M. Our business practices must be conducted with the highest standard of ethical behaviour, and our transactions must be accurately and properly documented and accounted for, in accordance with applicable legislation on retention of documents and files. Files must be kept up to date and complete, ensuring that proper documentation is warranted in case of audits, investigations or disputes.

The overall responsibility, for a careful business administration extends to each and every one of us. Each of us must ensure that business transactions are properly reflected in the company’s books and records.

Our policy applies to all records and transactions. You must not make false claims on items such as expense reports, falsify quality or safety results, record false sales or improperly record them early or late, understate or overstate assets or liabilities, or defer recording items that should be expensed. No entry may be made on the books and records of LW/M that intentionally hides or disguises the true nature of any transaction. Our financial records must conform to Generally Accepted Accounting Principles (GAAP).

PROPER USE OF COMPANY ASSETS

We all have a responsibility to protect LW/M’s assets against loss, theft and misuse. Our assets include cash, equipment, inventory, computer software, systems and other intellectual property. Our funds and property should be used only for the benefit of LW/M, and in compliance with such specific policies or instructions as may be communicated from time to time with respect to certain assets (IT or communication tools, vehicles, etc.). Theft, embezzlement or misappropriation of LW/M’s property may be subject to disciplinary action and criminal prosecution.

PROPER USE OF CONFIDENTIAL INFORMATION

LW/M has developed and continues to develop and use commercially valuable confidential and/or proprietary technical and non-technical information. Our confidential information includes, among other
things, information concerning products, personnel, medical, non-public financial data, information related to agents, shareholders, borrowers, customers, owners, vendors, internal programs or practices, technology and technical data, recipes and formulas, research and development information, including new product concepts, current and future marketing plans, commodity market positions, recipes, trading information and strategies.

Employees should protect LW/M's information, protect its intellectual property, abstain from assisting competitors and not use LW/M's information or assets for their own benefit or the benefit of another, or appropriate LW/M's business opportunities. Employees may not, directly or indirectly, disclose, or use for the benefit of any person, firm, corporation or other business organisation or themselves, any of the company's confidential information during the course of their employment (except in the proper performance of your duties) or at any time after the termination of their employment with LW/M.

If you have access to LW/M's confidential information, you must safeguard that information against any unauthorised disclosure, misuse, loss or theft. No confidential information may be shared before a confidential disclosure agreement is in place.

CONFLICTS OF INTEREST
LW/M's policy on conflicts of interest is straightforward. You should not compete with LW/M, and your business dealings on behalf of LW/M should not be influenced, or even appear to be influenced, by personal or family interests.

Employees and other persons engaged by LW/M, whose responsibilities include selling, marketing, transportation, purchasing or leasing of any type for the account of LW/M, need to exercise particular discretion to avoid a possible conflict of interest.

Gifts, gratuities or favours received from or offered by outsiders which could in any way be considered related to one's employment with LW/M, must be fully disclosed and approved in accordance with the rules
for dealings with suppliers mentioned above.

You must not participate actively or passively in any way with competitors’, suppliers’, or customers’ businesses, or use confidential LW/M information for personal gain. Any participation on your part, whether as owner, shareholder, partner, employee, director or consultant, with any competitors’, suppliers’ or customers’ business must be disclosed to LW/M.

Employees who have access to information concerning our products, ingredients or any commodity markets relevant to LW/M should not be involved in trading in these markets for personal accounts or for third parties accounts, either directly or indirectly through partners or colleagues. Employees engaged in activities related to such commodities are presumed to have access to such information. Employees involved in businesses non-competitive with LW/M may engage in normal hedging practices in these commodity markets.

You should disclose any transaction (or series of transactions) with LW/M, or with any supplier or customer of LW/M that involves EUR 100 or more, other than retail purchases of food products for personal or family use. Nevertheless, you may not indirectly engage in any prohibited transaction through an officer, employee, family member, agent, broker, trade association, consultant or other third party.

OUTSIDE EMPLOYMENT AND ACTIVITIES
You should avoid any activity or personal financial interest that could adversely affect the independence or objectivity of your judgment, interfere with the timely and effective performance of your duties and responsibilities, or that could discredit, embarrass or conflict with the best interests of LW/M.

Without prior approval you may not involve in outside employment or outside directorships. No outside activity should involve the use of LW/M’s name, trademarks, influence, assets, facilities or colleagues.
COMPETITION

LW/M has a strict policy of compliance with all applicable laws and regulations. European and national anti-trust and competition laws seek to preserve a free, competitive economy and are designed to protect consumers. The preservation of a competitive economy is essential to the public interest, to the interest of the business community in general, and to LW/M.

The objective of promoting competition aligns with LW/M’s belief in competing vigorously and legally in all areas of its operations. LW/M provides high quality products and services and can, therefore, sell its products and services at competitive prices, in compliance with anti-trust and competition laws.

Hence, LW/M employees are, for example, prohibited to:

- discuss with competitors any matter that may restrict the competition between LW/M and his competitors (such as sales price, credit terms, marketing strategies, market share or sales policies) except in those instances where there is a bona fide purchase from or sale to a competitor or bona fide credit checks for commercially reasonable purposes;
- agree with a competitor to restrict competition by fixing prices, allocating customers or territories or restricting competition by any other means;
- sell a product below cost with the intent to harm a competitor or engage in any other predatory trade practices.
MEDIA & COMMUNICATION
Nobody within LW/M, except SLT members and those authorised by the SLT, is permitted to communicate with the press or otherwise release information for publication without the approval of the Corporate Communications Specialist. All enquiries for information must be directed to the HR & Communications department.

CONTACT
For questions about “Use of confidential information” or “Competition”, please contact the Legal Department.

For questions and / or permission in relation to “Conflicts of interest”, “outside employment and activities” and “proper use of company assets”, please contact the HR department.

Questions on “Media & Communication” can be directed to the HR & Communication Department.

All other questions can be directed to your manager.
Dealing with our communities and governments
COMPLIANCE WITH LAWS
LW/M has a strict policy of compliance with all applicable laws and regulations. LW/M emphasizes the moral and ethical conduct of business in all of its operations.

Doubts may arise in every jurisdiction on the scope and application of the laws. In such situations a good faith effort should be made to act in line with the purpose and within the meaning of the law.

ENVIRONMENTAL COMPLIANCE
LW/M is committed to:
• minimising the impact of its operations on the environment;
• incorporating environmental protection measures;
• practicing sustainable development and the conservation of its resources.

Our operations are subject to many environmental requirements. Some of our facilities have specific air, water and waste permits. Some facilities are required to identify and report certain information periodically, such as chemical use and/or storage, air emissions and water discharges. The Plant Manager, Environmental Officer and the Safety Manager must be notified of all spills, releases, unsafe or hazardous conditions that poses an actual or potential threat to the safety of people or to the environment.

POLITICAL ACTIVITIES
LW/M employees are free to take an active interest in political and governmental activities and support principles, issues, parties or candidates of their own choice. Such activity must remain separate and distinct from employment with LW/M.

Company policy prohibits funds, assets, services or facilities on behalf of a political party or candidate. LW/M will not compensate or reimburse any individual employee, in any form, for a political contribution that the person has made.

DEALINGS WITH GOVERNMENTS AND GOVERNMENT OFFICIALS
LW/M will not tolerate any employee, colleague or individual on its behalf directly or indirectly offering, promising to pay or authorizing the payment of money or anything of value to foreign government officials, parties or political candidates, or international public organisations or their employees (hereafter collectively “government
officials”) for the purpose of influencing the acts or decisions of government officials.

Pursuant to the US Foreign Corrupt Practices Act, the British Anti-Bribery Act as well as laws of other countries, making illegal payments to government officials is strictly prohibited and may incur criminal liability. To comply with these laws LW/M must maintain accurate books and transactions and assets must be displayed systematic, detailed, accurate and correctly for (internal) accounting controls.

In addition, many governments have laws and regulations restricting the ability of government personnel to receive payments, gifts, gratuities or any item of value. The promise, offer or delivery of a gift, favour or gratuity to a governmental official is a violation of these rules. This would not only violate LW/M’s policy, but it also could also constitute a criminal offense.

GOVERNMENT INFORMATION REQUESTS

LW/M policy is to co-operate with all reasonable requests concerning company operations, from all government agencies, after consultation with the Legal department. All inquiries or requests for information from a governmental agency should be promptly reported to the LW/M Legal department.

You are entitled to know the authorisation of the governmental official seeking access to documents, his/her identity and the reason for the visit. You also are entitled to have legal assistance in responding to government requests.

All information provided to public organisations should be truthful and accurate. You should never lie to any investigator and never amend or destroy documents or records in response to a government investigation.
International trade regulations
National and international trade restrictions forbid LW/M to trade with certain foreign countries or persons. You must comply with these embargoes and trade restrictions. Actions that cannot be taken directly also may not be taken or arranged through third parties.

CONTACT
For questions regarding “Dealing with our communities and governments”, please contact the Legal department of LW/M.
Reporting suspected misconduct
LW/M is committed to act with integrity, it is important that employees do not speak up whenever they should. That is why, in addition to knowing the legal and ethical responsibilities that apply to your job, you should speak up if you:

• are unsure about the proper course of action and you need advice;
• believe that someone acting on behalf of LW/M is doing, or intends to do, that violates the law, this Code of Conduct, or other ethical standards; or
• believe that you or any colleague or service provider may have been involved in misconduct, either due to conflict with the law, this Code or other ethical standards.

All violations or suspected violations of our Code Conduct should be reported to the designated contact persons in the Code of Conduct. You can also contact one of the confidential advisors, published on the intranet, to ask for consultation and advice.

Reports may be made anonymously or by identifying yourself. Because it is usually more difficult to thoroughly investigate reports that are made anonymously, you are encouraged to share your identity when reporting rather than doing so anonymously. It is very important that anonymous reports contain enough detail, because it will not be possible to approach the anonymous reporter for clarification afterwards.

HOW REPORTS AND CONCERNS WILL BE ADDRESSED
Reports of Code of Conduct violations or potential violations should be made in good faith, based on the reasonable belief of the reporting person. They will be kept confidential to the extent permitted by law and according to our ability to address specific concerns. Reports of violations or potential violations should supply detailed information, to allow us to investigate and address the concern. In some cases, names will be needed to enable proper investigation. Some investigations may not allow for complete anonymity, but we will maximise our efforts to maintain confidentiality.
**Prohibition Against Retaliation**

LW/M will not tolerate retaliation against the reporting person. We take claims of retaliation seriously, and anyone engaging in retaliatory conduct will be subject to disciplinary action. If you suspect that you or someone you know has been retaliated against a good faith compliance or integrity issue in good faith, you should contact the HR & Communication Department.

**Co-operation During Investigations**

Employees and other persons engaged by LW/M must fully co-operate with internal investigations and must not interfere with an investigation by providing false, misleading or incomplete information, concealing information or encouraging others not to contribute to an investigation. They must not interfere with witnesses to a matter under investigation.

LW/M will co-operate, while retaining the ability to exercise its lawful and legitimate rights and privileges, with any government or other relevant authority's investigation of alleged wrong doing.

**Non-compliance**

Appropriate disciplinary action may be taken against any employee whose conduct violates applicable laws or regulations and/or our Code of Conduct. Discipline may also extend to individuals who actively or passively prevent the (possible) prevention, detection or reporting of a violation they know of. Disciplinary action will be determined based on the facts and circumstances as well as the applicable rules. Disciplinary action can include severe consequences (as permitted by law in the relevant country), such as termination of employment, suspension from employment without pay, demotion, transfer, withholding of promotion, impact on performance ratings.

LW/M may seek civil remedies against the violator, and, if a violation results in any monetary loss, he or she may be required to reimburse LW/M for that loss. Violation of our Code of Conduct is a serious matter and may, in some circumstances, subject LW/M or the employee involved to civil liability or even criminal prosecution. Appropriate corrective action may also include notifying the appropriate authorities.
If you are involved in a violation, the fact that you internally reported the violation, together with the degree of co-operation you display, and whether the violation is intentional or unintentional, will be given positive consideration in LW/M’s investigation and resulting disciplinary actions. However, we retain complete discretion in determining appropriate discipline for any misconduct.

Failure of a business partner to comply with the Code, where applicable, may be considered grounds to modify or even terminate the relationship.