

PRINCES GROUP CODE OF CONDUCT

CONTENTS

	Page
Princes Group Code of Conduct – Basic Policy and Principles	2
Princes Group Code of Conduct - Supplementary Provisions	3
Princes Group Code of Conduct – Detailed Rules	4
Directory for reporting or consulting	9

Basic Policy

All officers and employees of the Princes Group must comply with all applicable laws, rules and regulations where they operate, international standards and rules, any local rules (including any rules in any JV Agreement where relevant) and the Management Control Schedules of the Princes Group. In addition, all officers and employees of the Princes Group must act in a socially responsible manner by complying with generally accepted standards in the conduct of their business.

Basic Principles

1. Respect human rights, and do not discriminate on any basis, or engage in any form of harassment.
2. Maintain a high regard for environmental considerations when conducting business operations, and comply with the treaties, laws and regulations concerning the environment.
3. Promote fair business practices and comply with trade rules, regulations and internal corporate rules and policies.
4. Comply with the rules and regulations of international trade.
5. Protect and properly use confidential and proprietary information, protect the rights of the Princes Group and respect the rights of others.
6. Do not engage in insider dealing / trading.
7. Avoid conflicts of interest with the Princes Group and maintain a distinction between corporate and private business.
8. Record and report accounting and financial information timely and accurately.
9. Maintain proper legal and ethical standards with respect to gifts and entertainment.
10. Resolutely oppose any organisation, group or individual engaged in unlawful activities and do not provide money or other types of economic benefits to them.
11. Promptly report to or consult with the Departmental Manager, Secretary or the Assistant Secretary to the Compliance Committee or External Legal Counsel for Compliance upon discovering or committing any violations of the Princes Group Code of Conduct.

Supplementary Provisions

1. The Princes Group Code of Conduct applies to all officers and employees of the Princes Group (including corporate advisers, contract employees, and expatriates). The Princes Group Code of Conduct is also applicable, with appropriate modifications, to all temporary staff of the Princes Group.
2. The Detailed Rules attached are based upon the Princes Group Code of Conduct Basic Policy and Basic Principles.
3. Any violation of the Princes Group Code of Conduct shall be treated in the same manner as a violation of any Management Control Schedule or other Princes Group (or where applicable any local) policy procedure or practice, and any action resulting from such a violation will be determined after considering the nature, extent and circumstances of the violation, in accordance with the Disciplinary Policy (having regard to any national collective employment agreement and local laws).
4. The Compliance Officer is responsible for the Princes Group Code of Conduct and any significant revisions are subject to the approval of the Princes Ltd Chairman through the SDSB and the approval (where required by law) of the relevant subsidiary company Board of Directors.
5. The Princes Group Code of Conduct replaces the Princes Ltd and its subsidiaries' Code of Conducts and is effective as of 9th October 2015 with subsequent amendments effective from the date of issue.
6. Any revisions to the Princes Group Code of Conduct will be issued by the Compliance Officer. The revision will record the issue number and issue date. Ensure you retain only the current issue.

DETAILED RULES FOR THE PRINCES GROUP CODE OF CONDUCT

1. Respect human rights, and do not discriminate on any basis, or engage in any form of harassment.

- 1.1 Do not discriminate on the basis of any issues such as race, colour, creed, religion, gender, sexual orientation, national or regional origin, age or disability.
- 1.2 Do not engage in any form of sexual harassment.
- 1.3 Understand and recognise human rights issues.
- 1.4 Respect the indigenous culture, customs and language in countries and regions in which we conduct business, and conduct such business operations in harmony with the local society.

See Appendix One

2. Maintain a high regard for environmental considerations when conducting business operations, and comply with the treaties, laws and regulations concerning the environment.

Comply with treaties, laws and regulations concerning the environment, and protect human health and the environment.

See Appendix Two

3. Promote fair business practices and comply with trade rules and regulations.

- 3.1 Understand and comply with the laws and regulations which cover your commodity and service industry. Obtain necessary permission and conduct necessary official procedures.
- 3.2 Do not participate in any concerted actions in restraint of trade, including wrongfully fixing or maintaining prices, volumes, production facilities and/or the market, or otherwise restraining competition in any particular field of trade.
- 3.3 Do not refuse transactions with any specific trader (such as discount traders) or new traders jointly with others in the same business area or through trade associations, and do not consult with competitors about bids.
- 3.4 Do not conduct any business activities that would or might unfairly impair the rights of subcontractors.

See Appendix Three

4. Comply with the rules and regulations of international trade.

- 4.1 Understand and comply with international trade rules and regulations.
- 4.2 Carefully evaluate whether to undertake an international transaction involving military or other similar regulated goods or

services (i.e. strategic commodities and technology), taking into consideration the Princes Group's reputation, and make proper application to the relevant authorities, if required.

See Appendix Four

5. Protect and properly use confidential and proprietary information, protect the rights of the Princes Group and respect the rights of others.

- 5.1 Carefully manage the Princes Group's trade secrets, and do not disclose or use such secrets for unauthorized purposes.
- 5.2 Ensure that a proper non-disclosure or confidentiality agreement is concluded with third parties in advance if the disclosure of trade secrets to such third parties is required in the course of business transactions.
- 5.3 Even after termination of employment, do not use or disclose the Princes Group's trade secrets.
- 5.4 Do not make public statements or announcements on behalf of the Princes Group without proper authorization and refer all inquiries to the responsible department.
- 5.5 Do not infringe intellectual property rights owned by another company or person (such as unauthorized copying of computer software).

See Appendix Five

6. Do not engage in insider dealing / trading

- 6.1 Do not sell or purchase or encourage others to sell or purchase the securities of Mitsubishi Corporation and their subsidiaries while you are in possession of its "material non-public information" or "inside information" until such information is released publicly.
- 6.2 Do not sell or purchase or encourage others to sell or purchase any other company's securities while you are in possession of its "material non-public information" or "inside information" until such information is released publicly.
- 6.3 Do not disclose or encourage others to disclose "material non public information" or "inside information" to third parties.

See Appendix Six

Note - Securities and Exchange Law in Japan and related rules and regulations defines "material non-public information" with respect to insider trading, and the definition frequently changes. If you have doubt as to the meaning, you should consult with the Legal team.

7. Avoid conflicts of interest with the Princes Group and maintain a distinction between corporate and private business.

- 7.1 Do not use the Princes Group's tangible and/or intangible assets other than for authorized business purposes.
- 7.2 Do not use the Princes Group's assets or resources for personal gain.
- 7.3 Do not unfairly use the Princes Group's corporate information systems.
- 7.4 Do not work at another company while employed by the Princes Group without the Group's prior approval.
- 7.5 On termination of employment, return to the Princes Group all of its assets in your possession, including but not limited to any materials or equipment, and any files and documents generated for, or in connection with, the conduct of Princes Group business.
- 7.6 Do not engage in personal activities in the workplace having no relation to Princes Group business and not otherwise expressly authorized by the Princes Group, except for personal religious activities, such as praying, socially and generally accepted to be conducted at the work place in the country, if any. This includes, as examples, refraining from the promotion of religious and political beliefs (including without limitation, assembly, speech, propaganda, solicitation and distribution or posting of literature).

See Appendix Seven

8. Record and report accounting and financial information timely and accurately.

- 8.1 Do not record accounting and financial information inaccurately or in a way that would mislead those who receive it.
- 8.2 Record expenses and revenue timely.
- 8.3 Record credit and debt accurately.
- 8.4 Do not create off balance sheet assets or liabilities.

See Appendix Eight

9. Maintain proper legal and ethical standards with respect to gifts and entertainment.

- 9.1 Do not improperly provide entertainment, gifts, conveniences, or other economic benefits to public officials or those in a similar position, whether at home or abroad.
- 9.2 Do not pay a fee to an agent or consultant when it is known, or should be known, that part of such fee could be used to wrongfully gain influence with public officials or those in a similar position.
- 9.3 Do not provide any gift, entertainment, or any other type of economic gain to customers, or their directors, officers, employees or other related persons, in excess of accepted business and social norms, and obtain an approval according to internal corporate rules prior to providing any gift, entertainment or any other type of economic gain.

- 9.4 Do not receive gifts or enjoy entertainment in excess of accepted business and social norms, and obtain an approval according to internal corporate rules prior to receiving any gift or enjoying entertainment from any organization or entity rendering services to the Princes Group.

See Appendix Nine

10. Resolutely oppose any organisation, group or individual engaged in unlawful activities and do not provide money or other types of economic benefits to them.

- 10.1 Do not agree to demands for money or accept any unfair request from any organisation, group or individual engaged in unlawful activities.
- 10.2 Be aware of and avoid any contact with any organisation, group or individual whose trading business is believed to be engaged in unlawful activities.
- 10.3 Do not become knowingly involved in or unwittingly party to acts of terrorism, drug dealings, money laundering and other individual or organized criminal activities, and take all reasonable steps to ensure that neither you nor the Princes Group becomes involved in such activities.

See Appendix Ten

11. Promptly report to or consult with the Department Manager, Secretary to the Compliance Committee (or their Assistant) or External Legal Counsel for Compliance upon discovering or committing any violations of the Princes Group Code of Conduct.

- 11.1 Cooperate with the Princes Group's investigations of such violations so that Princes Group can investigate and confirm the relevant facts and take the appropriate action to prevent future occurrences.
- 11.2 The Department Managers, Secretary to the Compliance Committee (or their Assistant), External Legal Counsel for Compliance, who receives information or consultation from any reporting person shall not, without such person's consent, disclose the name or any other information of such reporting person, and shall secure that such person shall not incur any disadvantage as a result of such reporting person's disclosure of information or consultation.
- 11.3 Report to the Secretary to the Compliance Committee (or their Assistant) if the reporting person receives any improper treatment. (The Compliance Committee will thoroughly investigate and immediately take any appropriate action.)
- 11.4 Reports or consultations may be made in person, by telephone, by mail, etc. (See the attached directory for details).

- 11.5 The External Legal Counsel for Compliance shall not disclose the name of the reporting or consulting person without that person's consent, if an anonymous report is required, the report may be made to or with the External Legal Counsel for Compliance.
- 11.6 As an alternative to reporting issues to the Department Manager, Secretary to the Compliance Committee (or their Assistant) or external Legal Counsel, for actual and apparent breaches of Competition or Bribery Law, employees may report via the Mitsubishi Corporation LUKS system

See Appendix Eleven

PRINCES GROUP
CODE OF CONDUCT
DIRECTORY FOR REPORTING OR CONSULTING

Department Manager
Your direct Line Manager.

See Appendix Twelve

Appendix 1

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Equal Pay Directive Equal Treatment Directive Treaty of Rome (as amended by the Treaty of Amsterdam) Trade Union and Labour Relations (Consolidation) Act 1992 Employment Rights (Dispute Resolution) Act 1998 Protection from Harassment Act 1997 Human Rights Act 1998 Part Time Workers (Prevention of Less Favourable Treatment) Regulations 2005 Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2003 Gender Recognition Act 2004 Equality Act 2010 Agency Workers Regulations 2010	Appendix 19 – Human Resources Manual	Human Resources Legal
Netherlands	Algemene wet gelijke behandeling (Stb. 2015, 200) Artikelen 646 t/m 649 boek 7 BW Wet gelijke behandeling mannen en vrouwen bij de arbeid (Stb. 2014, 216) Wet gelijke behandeling op grond van handicap of chronische ziekte (Stb. 2014, 216) Wet gelijke behandeling op grond van leeftijd bij arbeid (Stb. 2014, 216) Verdrag van Rome (as amended in the Verdrag van Amsterdam) Arbeidsomstandighedenwet (Stb. 2015, 464)	Appendix 19 – Human Resources Manual	Human Resources Legal
Poland	Act of 26 June 1974 Polish Labour Code Act of 17 May 1989 on the Guarantees of Religion and Conscience Act of 23 May 1991 on Trade Unions Act of 6 June 1997 Criminal Code Act of 9 July 2003 on the Employment of temporary employees (workers) Act of 3 December 2010 on implementation of certain European Union regulations on equal treatment Act of 22 December 2015 on the recognition of professional qualifications acquired in the European Union Member States	Appendix 19 – Human Resources Manual	Human Resources Legal

	Act of 10 June 2016 on posting of workers in the framework of the provision of services		
Mauritius	The Constitution of Mauritius The Employment Relations Act 2008 The Employment Rights Act 2008 Export Enterprises (Remuneration Order) Regulations 1984 The Training and Employment of Disabled Persons Act 1996 The Protection of Human Rights Act 1998 The Equal Opportunities Act 2011	Appendix 19 – Human Resources Manual	Human Resources Legal
Italy	Treaty of Rome (as amended by the Treaty of Amsterdam) Equal Treatment Directive Italian Constitution (" <i>Costituzione della Repubblica Italiana</i> ") Law no. 300 of 20 May 1970 (" <i>Statuto dei lavoratori</i> ") Law no. 977 of 17 October 1967 (" <i>Tutela del lavoro dei bambini e degli adolescenti</i> ") Legislative Decree no. 81 of 9 April 2008 (" <i>Salute e sicurezza sul lavoro</i> ") Legislative Decree no 198 of 11 April 2006("Codice Pari Opportunità") Applicable Collective Labour Agreement (" <i>CCNL</i> ")	Appendix 19 – Human Resources Manual, The applicable National Collective Agreement	Human Resources Legal
France	Law n° 2014-873 dated August 4th 2014 (« Pour l'égalité réelle entre les femmes et les hommes ») Programming Law No 2017-256 Article L.1153-1 of the French Labour Code Article L.1152-1 of the French Labour Code Article 222-33 of the French Criminal Code Article 222-333-2 of the French Criminal Code	Appendix 19 – Human Resources Manual	Human Resources Legal

Appendix 2

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Environmental Protection Act 1990 Water Resources Act 1991- Water Environment (Controlled Activity) Regulations 2011 Control of Major Accident Hazard Regulations 2015 Wales Act 2017 Water Industry Act 1997 Water Industry (Financial Assistance) Act 2012 Water Industry (Scotland) Act 2002Clean Air Act 1993 Environment Act 1995 Water Act 2003 – Water Act 2014 Environmental Damage (Prevention & Remediation) Regulations 2015	Not Applicable	Human Resources Legal
Netherlands	Wet milieubeheer Waterwet Gemeentelijke (lozings) verordeningen Wet bodembescherming Wet natuurbescherming (stb 2016,34)	Not Applicable	Human Resources Legal
Poland	Act of 6 June 1997 Criminal Code Act of 13 June 2013 on the packaging management and packaging wastes management Act of 20 May 2016 on the energy efficiency Act of 27 April 2001 on Environmental Protection Act of 18 July 2001 Water Law Act on Waste dated 14 th December 2012 Act of 13 April 2007 on Prevention and Remediation of Environmental Damages	Not Applicable	Human Resources Legal

Mauritius	The Environment Protection (Standards for Air) Regulations 1998 The Waste Water Management Authority Act 2000 The Waste Water (Registration of Waste Water Carriers and Disposal of Waste Water) Regulations 2006 The Environment Protection (Standard of Hazardous Wastes) Regulations 2001 The Environment Protection Act 2002 The Environment Protection (Standards for Effluent Discharge) Regulations 2003 The Environment Protection (Effluent Discharge Permit) Regulations 2003. The Environment Protection (Collection, Storage, Treatment, Use and Disposal of Used Oil) Regulations 2006 Environment Protection (Control of Noise) Regulations 2008. Environment Protection (Industrial Waste Audit) Regulations 2008. Occupational Safety and Health Act 2005.	Not Applicable	Technical Legal
Italy	Legislative Decree no 152 of 3 April 2006 ("Testo Unico Ambientale") Legislative Decree no. 231 of 8 June 2001	Not Applicable	Technical Legal
France	French Civil Code French Environmental Code	Not Applicable	Human Resources Legal

Appendix 3

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Treaty of Rome Food Safety Act 1990 Competition Act 1998 Enterprise Act 2002 EU Regulation 178/2002 EU Regulations 852/2004, 853/2004, 854/2004	Appendix 8 – Product Recall and Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14–Competition Law Compliance	Legal Technical
Netherlands	Verdrag betreffende de werking van de Europese Unie Warenwet Mededingingswet Burgerlijk Wetboek boek 2 Verordening (EG) nr. 178/2002 van het Europees Parlement en de Raad van 28 januari 2002 tot vaststelling van de algemene beginselen en voorschriften van de levensmiddelenwetgeving, tot oprichting van een Europese Autoriteit voor voedselveiligheid en tot vaststelling van procedures voor voedselveiligheidsaangelegenheden Wet oneerlijke handelspraktijken (Boek 6 BW) Europese verordening Verstrekking voedselinformatie aan consumenten (Verordening 1169/2011) Wet Algemene levensmiddelen verordening (ALV) Wet dieren	Appendix 8 – Product Recall and Emergency Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14 –Competition Law Compliance	Legal Technical
Poland	Act of 21 December 2000 on the Commercial Quality of Agricultural and Food Products Act of 25 August 2006 on Safety of Food and Feeding Act of 15 December 2016 on the counteracting unfair use of contracting advantage in the agricultural and food products trade (comes into force on 29 June 2017) Act of 16 April of 1993 on Suppression of Unfair Competition Act of 16 February 2007 on Protection of Competition and Consumers Act of 2 July 2004 on Freedom of Conducting Business Activity Act of 23 August 2007 on Suppression of Unfair Market Practices	Appendix 8 – Product Recall and Emergency Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14 –Competition Law Compliance	Legal Technical

Europe	Treaty on Functioning of European Union EU Regulation 178/2002 EU Regulations 852/2004, 853/2004, 854/2004	Appendix 8 – Product Recall and Emergency Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14 –Competition Law Compliance	Legal Technical
Mauritius	Fair Trading Act 1979 The Competition Act 2007 Public Health Act 1925 Local Government Act 2011	Appendix 8 – Product Recall and Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14–Competition Law Compliance	Legal Technical
Italy	Treaty of Rome EU Regulation 178/2002 EC Regulation no 330/2010 ("Vertical Restraints") Italian Civil Code (Artt. 2595-2601) Law no. 287 of 10 October 1990 ("Legge Antitrust") Law no. 192 of 18 June 1998 ("Legge sulla subfornitura")	Appendix 8 – Product Recall and Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14–Competition Law Compliance	Legal Technical
France	French Code of Commerce French Public Markets Code Collective Bargaining Agreement	Appendix 8 – Product Recall and Emergency Crisis Management Handbook Appendix 9 – Technical Department Policies Appendix 14 –Competition Law Compliance	Legal Technical

Appendix 4

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Import, Export and Customs Powers (Defence) Act 1939 Customs and Excise Management Act 1979 Export Control Act 2002 Export Control Act 2008	Not Applicable	Finance Legal Supply Chain
Netherlands	Algemene Douanewet	Not Applicable	Finance Legal Supply Chain
Poland	Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code Act of 16 November 2016 on the National Fiscal Administration Act of 19 March 2004 on Custom Law	Not Applicable	Finance Legal Supply Chain
Mauritius	Excise Act 1994 Customs Act 1988 Finance Act 2006	Not Applicable	Finance Legal Supply Chain
Italy	EC Regulation no. 952 of 9 october 2013 ("Codice doganale europeo")	Not Applicable	Finance Legal Supply Chain
France	Internal and European laws and directives French Code of Commerce	Not Applicable	Finance Legal Supply Chain

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
--	-------------------------------	------------------------------	------------------

UK	Patents Act 2004 Copyright, Designs and Patent Act 1988 Public Interest Disclosure Act 1998 Human Rights Act 1998 Data Protection Act 1998 GDPR	Appendix 12 - Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 17 – Acquisition Procedures Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual Appendix 5 – Media Policy	Human Resources Commercial IT Legal
Netherlands	Rijkssoctrooiwet 1995 Auteurswet Wet openbaarheid van bestuur Grondwet , EVRM Wet bescherming persoonsgegevens (including obligation to notify possible data breach) Benelux Verdrag inzake de intellectuele eigendom (BVIE) Wet Huis voor Klokkenluiders GDPR	Appendix 12 – Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 17 – Acquisition Procedures Appendix 18 – IT Code of Conduct Appendix 19 – HR Policies Appendix 5 – Media Policy	Human Resources Commercial IT Legal
Poland	Act of 16 April of 1993 on Suppression of Unfair Competition Act of 4 February 1994 on Copyright and Neighbouring Rights Act of 28 October 2002 on the Liability of Collective Entities for Acts Prohibited Under Penalty Act of 30 June 2000 on Industrial Property Act of 27 July 2001 on Protection of Data Bases Act of 29 August 1997 on Protection of Personal Data Criminal Code of June 6, 1997 GDPR	Appendix 12 – Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 17 – Acquisition Procedures Appendix 18 – IT Code of Conduct Appendix 19 – HR Policies Appendix 5 – Media Policy	Human Resources Commercial IT Legal

Appendix 5

Mauritius	The Criminal Code of Mauritius The Copyright Act 1997 The Patents, Industrial Design and Trademarks Act 2002 The Data Protection Act 2004 The Data Protection Regulations 2009 The Code of Corporate Governance for Mauritius The Companies Act 2001 Civil Code The National Code of Corporate Governance for Mauritius (2016)	Appendix 12 – Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 17 – Acquisition Procedures Appendix 18 – IT Code of Conduct Appendix 19 – HR Policies Appendix 5 – Media Policy	Human Resources Commercial IT Legal
Italy	Legislative Decree no. 30 of 10 February 2005 ("Intellectual property law") Law no. 633 of 22 April 1941 ("Legge sul diritto d'autore") Law no. 196 of 30 June 2003 ("Legge sulla privacy") GDPR	Appendix 12 – Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 17 – Acquisition Procedures Appendix 18 – IT Code of Conduct Appendix 19 – HR Policies Appendix 5 – Media Policy	Human Resources Commercial IT Legal
France	French Intellectual Property Code French Civil Code GDPR	Appendix 12 – Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 17 – Acquisition Procedures Appendix 18 – IT Code of Conduct Appendix 19 – HR Policies Appendix 5 – Media Policy	Human Resources IT Legal

Appendix 6

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Criminal Justice Act 1993 Financial Services and Markets Act 2000 Financial Services (Banking Reform) Act 2013	Appendix 17 – Acquisition Procedures Appendix 19 – Human Resources Manual	Human Resources Legal
Netherlands	Wetboek van Strafrecht Wet ter voorkoming van witwassen en financieren van terrorisme (Wwft) Wet op het financieel toezicht	Appendix 17 – Acquisition Procedures Appendix 19 – Human Resources Manual	Human Resources Legal
Poland	Act of 28 October 2002 on the Liability of Collective Entities for Acts Prohibited Under Penalty Regulation (EU) no 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) Act of 29 July 2005 on Financial Instruments' Trade	Appendix 17 – Acquisition Procedures Appendix 19 – Human Resources Manual	Human Resources Legal
Mauritius	The Companies Act 2001 The Securities Act 2005	Appendix 17 – Acquisition Procedures Appendix 19 – Human Resources Manual	Human Resources Legal
Italy	Legislative Decree no. 58 of 24 February 1998 (Art. 180-196) Consob Regulation no. 11768 of 23 December 1998 Consob Regulation no. 11971 of 14 May 1999 Legislative Decree no. 231 of 8 June 2001	Appendix 17 – Acquisition Procedures Appendix 19 – Human Resources Manual	Human Resources Legal

Appendix 7

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Companies Act 2006	Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual	Human Resources IT Legal
Netherlands	Not Applicable	Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual	Human Resources IT
Poland	Criminal Code of June 6, 1997	Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual	Human Resources IT
Mauritius	The Companies Act 2001 The Financial Reporting Act 2004 <u>The National Code of Corporate Governance for Mauritius (2016)</u>	Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual	Human Resources IT Legal
Italy	Legislative Decree no. 231 of 8 June 2001 Italian Civil Code (Art. 2373, 2391 and 2629- <i>bis</i>)	Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual	Human Resources IT Legal
France	French Financial and Monetary Code French Criminal Code French Company Code	Appendix 18 – IT Code of Conduct Appendix 19 – Human Resources Manual	Human Resources Legal

Appendix 8

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Companies Act 2006 Fraud Act 2006 Theft Act 1968	Not Applicable	Finance
Netherlands	Dutch Statutory Rules on Financial Reporting as laid down in Article 2:360 of the Dutch Civil Code and the generally accepted accounting principle (IFRS, Dutch GAAP or US GAAP) Algemene Wet inzake Rijksbelastingen (AWR)	Not Applicable	Finance
Poland	Act of 20 August 1997 on the National Court Register Act of 29 September 1994 on Accountancy Act of 16 November 2000 on Counteracting Money Laundering and Financing Terrorism Act of 10 September 1999 – Fiscal Penal Law Act 6 June 1997 - Criminal Code	Not Applicable	Finance
Mauritius	The Companies Act 2001 The Financial Reporting Act 2004 The Code of Corporate Governance <u>Ad hoc reporting:</u> The Prevention Of Corruption Act 2002 The Financial Intelligence and Anti-Money Laundering Act 2002.	Not Applicable	Finance
Italy	Articles from 2423 until 2435-bis civil code; Article 2497 ff. civil code. Articles from 2621 until 2642 civil code Legislative Decree no. 231 of 8 June 2001	Not Applicable	Finance
France	French Financial & Monetary Code	Not Applicable	Finance

Appendix 9

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Bribery Act 2010	Appendix 12 Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 19 – Human Resources Manual	Human Resources Legal
Netherlands	<u>Holland</u> Wet op het Financieel Toezicht Besluit Marktmisbruik Wft Wet op de Economische Delicten Wet ter voorkoming van witwassen en financieren van terrorisme (Wwft)	Appendix 12 Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 19 – Human Resources Manual	Human Resources Legal
Poland	Act of 6 June 1997 Criminal Code Act of 28 October 2002 on the Liability of Collective Entities for Acts Prohibited Under Penalty	Appendix 12 Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 19 – Human Resources Manual	Human Resources Legal
Mauritius	The Companies Act 2001 The Criminal Code of Mauritius The Prevention of Corruption Act 2002	Appendix 12 Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 19 – Human Resources Manual	Human Resources Legal
Italy	Legislative Decree no. 231 of 8 June 2001	Appendix 12 Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 19 – Human Resources Manual	Human Resources Legal

France	French Criminal Code French Financial and Monetary Code	Appendix 12 Legal Policy and Approved Legal Advisors & Dawn Raids & Unannounced Visits Appendix 19 – Human Resources Manual	Human Resources Legal

Appendix 10

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Not Applicable	Appendix 14 – Competition Law Compliance	Human Resources Legal
Netherlands	Wet Huis voor Klokkenluiders (in case whistleblower policy is included in the Code of Conduct) Article 34 Wbp (In case a data breach policy is included in the Code of Conduct)	Appendix 14 – Competition Law Compliance	Human Resources Legal
Poland	Act of 6 June 1997 Criminal Code Act of 16 November 2000 on Counteracting Money Laundering and Financing Terrorism	Appendix 14 – Competition Law Compliance	Human Resources Legal
Mauritius	The Prevention of Terrorism Act 2002 The Criminal Code of Mauritius The Prevention of Corruption Act 2002 The Financial Intelligence and Anti-Money Laundering Act 2002.	Appendix 14 – Competition Law Compliance	Human Resources Legal
Italy	Legislative Decree no. 231 of 8 June 2001	Appendix 14 – Competition Law Compliance	Human Resources Legal
France	French Criminal Code French Financial and Monetary Code	Appendix 14 – Competition Law Compliance	Human Resources Legal

Appendix 11

	Relevant Laws and Regulations	Management Control Schedules	Lead Departments
UK	Money Laundering Regulations 2007	Appendix 19 – Human Resources Manual	Legal
Netherlands	Not Applicable	Appendix 19 – Human Resources Manual	Legal
Poland	Not Applicable	Appendix 19 – Human Resources Manual	Legal
Mauritius	Not Applicable	Appendix 19 – Human Resources Manual	Legal
Italy	Not Applicable	Appendix 19 – Human Resources Manual The applicable National Collective Agreement	Legal
France	Not Applicable	Appendix 19 – Human Resources Manual	Legal

Appendix 12

	Secretary to Compliance Committee	Assistant Secretary to Compliance Committee	External Legal Counsel
UK	Group Legal Counsel, Princes Limited Contact can be made by phone, email or post. (Switchboard) 0151 966 7000 (Mobile) 07435 541820 e-mail: sam.plant@princes.co.uk Post : Group Legal Counsel, Secretary to Compliance Committee, Princes Limited, Royal Liver Building, Pier Head, Liverpool, L3 1NX	Not Applicable	Parmjit Singh Partner Eversheds Sutherland Contact can be made by phone, fax, email or post. (Direct Dial) +44 (0) 121 232 1410 (Mobile) +44 (0) 7768 954 246 (Fax) +44 (0) 121 232 1900 e-mail: parmjitsingh@eversheds-sutherland.com Post: Parmjit Singh Partner Eversheds Sutherland, 115 Colmore Row, Birmingham B3 3AL

	Secretary to Compliance Committee	Assistant Secretary to Compliance Committee	External Legal Counsel
PFBV Netherlands	Group Legal Counsel, Princes Limited Contact can be made by phone, email or post. (Switchboard) 0151 966 7000 (Mobile) 07435 541820 e-mail: sam.plant@princes.co.uk Post : Group Legal Counsel, Secretary to Compliance Committee, Princes Limited, Royal Liver Building, Pier Head, Liverpool, L3 1NX	Technical Manager Princes Foods BV Contact can be made by phone, email or post. (Direct Line) +31 10201 8181 (Switchboard) +31 10 201 8100 e-mail: Maria.DiBiase@princes.eu Post: Assistant Secretary to the Compliance Committee, Technical Manager Princes Foods BV, Boompjes 40, 3011 XB PO Box 19157, 3001 BD, Rotterdam, Holland.	Miriam Van Ee Partner Eversheds Sutherland Contact can be made by phone, fax, email or post. (Direct Dial) + 31 10 24 88 02 6 e-mail: miriamvanee@eversheds-sutherland.com Post:- Miriam Van Ee Partner Eversheds Sutherland (Netherlands) BV Cuserstraat 91, 1081 CN, Amsterdam Netherlands

	Secretary to Compliance Committee	Assistant Secretary to Compliance Committee	External Legal Counsel
Princes Polska Poland	Group Legal Counsel, Princes Limited Contact can be made by phone, email or post. (Switchboard) 0151 966 7000 (Mobile) 07435 541820 e-mail: sam.plant@princes.co.uk Post : Group Legal Counsel, Secretary to Compliance Committee, Princes Limited, Royal Liver Building, Pier Head, Liverpool, L3 1NX	Technical Manager Princes Foods BV Contact can be made by phone, email or post. (Direct Line) +31 10201 8181 (Switchboard) +31 10 201 8100 e-mail: Maria.DiBiase@princes.eu Post: Assistant Secretary to the Compliance Committee, Technical Manager Princes Foods BV, Boompjes 40, 3011 XB PO Box 19157, 3001 BD, Rotterdam, Holland.	Aleksandra Kunkiel-Krynska Partner Wierzbowski Eversheds Sutherland Sp.k Contact can be made by phone, fax, email or post. (Direct Dial) +48 22 50 50 775 (Switchboard) +48 22 50 50 700 (Fax) +48 22 50 50 701 e-mail: aleksandra.kunkiel-krynska@eversheds-sutherland.pl Post: Aleksandra Kunkiel-Krynska Partner Wierzbowski Eversheds Sutherland Sp.k Centrum Jasna Ul. Jasna 14/16a 00-041 Warszawa Poland

	Secretary to Compliance Committee	Assistant Secretary to Compliance Committee	External Legal Counsel
Mauritius	Group Legal Counsel, Princes Limited Contact can be made by phone, fax, email or post. (Switchboard) 0151 966 7000 (Mobile) 07435 541820 e-mail: sam.plant@princes.co.uk Post : , Group Legal Counsel, Secretary to Compliance Committee, Princes Limited, Royal Liver Building, Pier Head, Liverpool, L3 1NX	Head of Finance, IT & Procurement Princes Tuna (Mauritius) Ltd Contact can be made by phone, fax, email or post. (Switchboard) - +23 (0)206 9000 e-mail Michael.duddle@princes.co.uk Post: Head of Finance, IT & Procurement Princes Tuna (Mauritius) Limited, PO Box 131, New Trunk Road, Riche Terre, Port Louis, Republic of Mauritius	Urmilla Boolell Head of Chambers Banymandhub Boolell Chambers Contact can be made by phone, fax, email or post. (Switchboard) +230 212 9810 (Fax): +230 212 9868 E-mail: u.boolell@templegroup.mu Post: Urmilla Boolell, Head of Chambers Banymandhub Boolell Chambers 2, Labourdonnais Street Port Louis Mauritius

	Secretary to Compliance Committee	Assistant Secretary to Compliance Committee	External Legal Counsel
Italy	Group Legal Counsel, Princes Limited Contact can be made by phone, email or post. (Switchboard) 0151 966 7000 (Mobile) 07435 541820 e-mail: Sam.plant@princes.co.uk Post : Group Legal Counsel, Secretary to Compliance Committee, Princes Limited, Royal Liver Building, Pier Head, Liverpool, L3 1NX	PIA General Counsel Princes Industrie Alimentari Contact can be made by phone, email or post. (Direct Line) +39 0881352464 e-mail: maria.mariniello@princes-ia.it Post: PIA General Counsel Assistant Secretary to the Compliance Committee, Princes Industrie Alimentari Zona ASI – Località Incoronata 71122 - Foggia	Riccardo Bianchini Riccardi Partner Eversheds Sutherland Contact can be made by phone, fax, email or post (Direct Dial) +39 02 89 28 71 (Mobile) +39 33 53 62 417 (Fax) +39 02 583 038 18 e-mail riccardobianchini@eversheds.it Post: Riccardo Bianchini Riccardi Partner Eversheds Sutherland Via Privata Maria Teresa 4 Milan 20123 Italy

	Secretary to Compliance Committee	Assistant Secretary to Compliance Committee	External Legal Counsel
Princes France	Group Legal Counsel, Princes Limited Contact can be made by phone, email or post. (Switchboard) 0151 966 7000 (Mobile) 07435 541820 e-mail: scm.plant@princes.co.uk Post : , Group Legal Counsel, Secretary to Compliance Committee,	Technical Manager Princes Foods BV Contact can be made by phone, email or post. (Direct Line) +31 10201 8181 (Switchboard) +31 10 201 8100 e-mail: Maria.DiBiase@princes.eu Post: Maria Di Biase Technical Manager	Dan Roskis Partner Eversheds Sutherland France (LLP) 8 Place d'Iéna 75116 Paris France (Direct Line) + 33 1 55 73 41 37 (Mobile) <u>+33 6 12 82 68 93</u> (Fax) <u>+33 1 55 73 40 11</u> e-mail: danroskis@eversheds-sutherland.com

	Princes Limited, Royal Liver Building, Pier Head, Liverpool, L3 1NX	Assistant Secretary to the Compliance Committee, Technical Manager Princes Foods BV, Boompjes 40, 3011 XB PO Box 19157, 3001 BD, Rotterdam, Holland.	Post: Dan Roskis Partner Eversheds Sutherland France (LLP) 8 Place d'Iéna 75116 Paris France
--	--	---	---