



2025 BUSINESS CODE OF CONDUCT

Dawn Meats Ireland (Dawn) and Dunbia UK (Dunbia) are respectively the Irish and UK operating companies of Dawn Meats. The Dawn and Dunbia company codes of conduct and ethics are designed to uphold and communicate our purpose, vision and values. Core to this policy is doing the right thing and that the company and all our team members comply with both the spirit and the letter of any legal, ethical and moral frameworks, by which the company is bound.

This document describes the basic ethical standards that should be observed by the company, senior managers and team members. These standards also apply to consultants, brokers, agents, and other third parties that perform services on behalf of Dawn Meats. Dawn Meats is committed to remain a socially responsible business and we encourage all team members to become actively involved in the local communities in which we operate. The company has an established commitment to drive excellence and bring us on a path to being 'Europe's most sustainable meat company'. All team members are expected to support progress towards this goal, to assist continuous improvement and enhance the company's reputation and that of its team members.

Dawn and Dunbia have a fundamental commitment to acting ethically and with integrity in all business relationships. This commitment is extended to social and environmental responsibilities and our purpose, vision, values and objectives are set out in greater detail in our [4th Corporate Sustainability Update 2023](#). The evolving nature of the business agenda means that we are continually learning and striving to identify and action best practice by working in collaboration with our supply chain partners and customers. Key drivers are transparency, collaboration, engagement and trust. At Dawn and Dunbia our purpose is to "provide consistent quality meat products from sustainable sources to support our rural communities, human health and nature's ecosystem". We will only achieve

this aspiration, in partnership with our people and our suppliers of livestock, other goods and services. Our Supplier Code of Conduct sets out our expectations for producers, farmers, manufacturers, processors, and all those who supply goods and services to Dawn and Dunbia.

The United Nations (UN) Global Compact' principles and the UN Guiding Principles on Business and Human Rights reflected in this Code of Conduct are embedded in our overall approach to sustainable business practices and are aligned to suite of business policies as referenced in [Policies and Statements - Dawn Meats](#).

The Human Rights Policy principles are derived from:

- The Universal Declaration of Human Rights.
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- Children's Rights and Business Principles.
- UN Women's Empowerment Principles.
- The UN Convention Against Corruption
- The UK Modern Slavery Act (2015)
- UN Sustainable Development Goals

Code of Conduct Requirements and Expectations

Legal Obligations:

- The company competes successfully in today's business environment and is committed to do so in full compliance with all applicable antitrust, competition and fair dealing laws.

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- Dawn is incorporated in the Rep. Ireland under reg No. 135414 and Dunbia is incorporated in the UK under reg No. 3382084

Business Conduct Standards:

- Dawn and Dunbia have always set high standards for the way we conduct business. We expect our staff to conduct themselves with integrity, impartiality, honesty and transparency. It is also our expectation that supply chain partners display these values in their business activities.
- We compete fairly and ethically for business and maintain accurate and authentic records of business transactions.
- We risk assess and mitigate against any situations which may negatively impact Dawn's and Dunbia's reputation and/or business interests.

Proscribed Activities, Bribery, Fraud and Corruption:

- The company has a clear commitment to conduct business responsibly, ethically and in compliance with all applicable laws in the jurisdictions in which we operate, and we expect all team members to reflect this commitment in their behaviours and interaction with others.
- Dawn and Dunbia will not tolerate bribery, fraud or corruption in any form.
- Any breach of confidentiality and/or conflict of interest as outlined in the terms and conditions of employment of all team members will be subject to disciplinary action.
- Any case of fraud, bribery or corruption will be investigated, legal remedy pursued, and disciplinary procedures fully enforced against team members engaged in or complicit with fraudulent acts or proscribed activity. This policy will also be regularly reviewed to ensure the effective operation of related controls.

Gifts & Hospitality (G&H):

Gifts, entertainment, and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions or other social gatherings in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

Examples of G&H which are never permissible include:

- G&H that are offered for something in return or in the form of cash or cash equivalent vouchers
- Entertainment of a sexual or similarly inappropriate nature

- G&H that are unduly lavish or extravagant

Examples of G&H which are ordinarily acceptable include:

- Modest or occasional meals or gifts of nominal value
- Occasional attendance at ordinary sports, theatre and other cultural events

Political Engagement:

- Dawn and Dunbia do not make contributions or donations to political organisations or independent candidates, nor does it incur any political expenditure.
- Dawn is compliant with the requirements of the Regulation of Lobbying Act 2015

Community and Charity Activity & Donations:

Dawn Meats has identified the following themes which are supported in keeping with our purpose, vision and values:

- Agriculture, food & related charity and community events
 - Health & well-being related charity and community event
 - Local charities and community events
 - Scientific or academic research on livestock production/meat protein challenges
 - Youth and older persons' charity and community events
- Dawn Meats will not make any charitable donations that could be reasonably construed as a bribe and all charitable donations must be registered in the Community and Charity Activity Register (CCAR) on the company intranet. This information is publicised in the company newsletter and reported on through the company Sustainability Report and other stakeholder communications.

Human Rights:

We treat all employees fairly, honestly and with respect, in full compliance with the following requirements:

- Dawn and Dunbia respect the different cultures and values of countries in which we operate and source our raw materials.
- Where young people under the age of 18 are employed, we will ensure that their work is not likely to be harmful to their health and/or development and remain compliant with all applicable laws.
- Under no circumstances shall we tolerate, engage in or support human trafficking or forced labour as defined by the International Labour Organisation.

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- All employees have the legal right to work and any migrant workers, including but not limited to refugees, asylum seekers and those with subsidiary protection, should be in possession of a valid work permit issued by the relevant authority.
 - Employees are not required to lodge “deposits” or their identity papers
 - We take appropriate steps to identify, address and avoid Modern Slavery within direct operations and supply chains. Through appropriate risk management strategies, we aim to ensure that goods provided to Dawn and Dunbia are not tainted by slavery, human trafficking or exploitation.
 - The use of forced or involuntary labour of any type is prohibited and physical abuse, verbal or sexual harassment or intimidation of team members is expressly forbidden.
 - The rights of employees to join or refrain from joining worker organisations and workplace access is allowed for such organisations, to facilitate their representative functions and we respect the rights of employees to organise and bargain collectively.
 - There will be no discrimination in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.
 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet the basic needs and to provide some discretionary income.
 - All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. For the avoidance of doubt, “understandable information” includes written, verbal, visual and pictorial, translated into the workers’ native languages where there is no, reduced or inadequate comprehension of the primary language (e.g. English) used by the business.
 - Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.
 - Formal written disciplinary procedures are in place outlining the steps for progressive discipline to correct misconduct or unsatisfactory performance inclusive of an appeal process.
 - A ‘Whistleblower’ service is provided, which enables employees to anonymously report malpractice, unlawful or unethical behaviour within the workplace. This is a telephone-based service which is advertised internally and is complemented by other reporting options. Where appropriate the relevant stakeholder who may be directly or indirectly impacted will be advised in relation to these matters.
 - Working hours will comply with national laws and industry standards and overtime shall be voluntary and compensated in accordance with local law.
 - Where Labour Providers are used, they will be legally registered and will only supply workers who are registered with them. Relationships with Labour Providers are covered by a Service Level Agreement which complies with local legal requirements.
 - Workers will not pay any fees to gain employment.
- Health & Safety:**
- Dawn and Dunbia are committed to promoting a positive and proactive culture of Health and Safety throughout its operations. We are committed to ensuring that our activities are carried out with due regard to health, safety and wellbeing standards within our industry and our legal obligations under Health, Safety and Fire legislation in the jurisdictions in which we operate.
- Responsibility for health and safety of all team members is assigned to a senior management representative.
 - A safe and healthy working environment is maintained for all team members and the health and wellbeing, both physical and mental, of our employees is supported.
 - All articles and substances are handled, stored, transported and used in accordance with best practise.
 - Emergency procedures are planned, implemented, monitored and communicated to all persons on our premises.
 - Plant and work equipment provided is suitably maintained and sufficient for the work to be undertaken.
 - Instruction, training and supervision is provided for all persons involved in our undertakings.
 - Consultation takes place with all colleagues on matters relating to health, safety and welfare.
 - Risk assessments are completed, reviewed and updated as appropriate.
 - Health and safety KPI’s are proactively reviewed with a view to driving continuous improvement.

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