

UCC EUROPE CODE OF ETHICS AND BEHAVIOURS



Message from the CEO

Dear Colleagues,

Doing the right thing, the right way is at the heart of who we are – for our customers, colleagues, communities, and the environment. Acting responsibly, ethically, and with integrity drives our growth and strengthens our long-term success.

To strengthen alignment across UCC Europe Group, we are pleased to introduce the updated Code of Ethics and Behaviours (the Code) for all employees. This Group-wide policy sets clear standards and expectations, ensuring consistent, responsible, and ethical practices wherever we operate, while complementing existing local policies.

The Code guides how we respect one another, safeguard our business, and care for the environment. By embracing its principles every day, we reinforce our values and support our shared ambitions across Europe.

We encourage you to read the Code carefully and act in line with its principles, supporting our values and behaviours in everything you do.

Tsukasa Sato
CEO
UCC Europe



Every coffee,
every moment

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1. The Code

- 1.1** UCC Europe Ltd and its subsidiaries (together, **UCCE Group**) believe operating responsibly, ethically and with integrity are fundamental requirements to sustainable business growth and fulfilling the needs of society. This relies on our ability to incorporate our values, behaviours and policies into our business activities and supply chains, which will help earn trust, reduce risk and create shared values with all our stakeholders.
- 1.2** To support our fundamental beliefs and goals for business growth, we have developed this Code of Ethics and Behaviours (**Code**) to ensure that the respect for human rights, business integrity and environmental responsibility is applied and upheld by all employees of UCC Europe Group.
- 1.3** Working within UCCE Group puts you in a position of trust – you are responsible for upholding our standards, principles and values when dealing with other employees and contractors, customers, suppliers, shareholders, the environment and our local communities. We all have a shared responsibility to protect UCCE Group's reputation, and this Code will help you to understand why this is important within your day-to-day role, and what is expected of you.

Scope and responsibilities

- 1.4** The Code applies to everyone working for UCCE Group, including permanent employees, contractors, and temporary/agency workers (**Staff**). We also expect that third parties working on our behalf will follow similarly high standards. All staff should read, understand and follow the requirements of this Code.
- 1.5** This includes:
- a) complying with the applicable laws and regulations in all countries in which UCCE Group operates;
 - b) conducting ourselves in a professional manner with the highest standards of honesty and integrity;
 - c) following UCCE Group policies and procedures;
 - d) working with our suppliers, third parties and agencies to ensure our ethical standards are maintained; and
 - e) if in doubt, seeking guidance and always doing the right, ethical thing.
- 1.6** All managers should lead by example, displaying high standards of integrity at all times and creating an environment where staff feel confident in raising potential concerns and questions. If you require more information, refer to the Staff Handbook or speak to your local HR contact or line manager.

Raising concerns

- 1.7** UCCE Group expects that business is conducted with the highest standards of ethics, honesty and integrity, and everyone has an important role to play in achieving this. If you have concerns about an alleged breach within UCCE Group (e.g., unethical behaviour, malpractice, illegal action, failure to comply with regulatory requirements, accounting irregularities, or violations of Group policy) then you are strongly encouraged to raise those concerns.

Speak-up

- 1.8** UCCE Group has procedures in place which allow you to report instances where you have a concern. Please refer to the Group Whistleblowing Policy for more information.
- 1.9** All external stakeholders including customers, suppliers, staff, and business partners, may raise their concerns with their contact at UCC, or directly via **whistleblowing@ucc-europe.co.uk**.
- 1.10** All reports will be treated confidentially and investigated in accordance with the Group Whistleblowing Policy and the applicable local rules.

Non-retaliation

- 1.11 UCCE Group is committed to a workplace culture where staff feel safe to raise concerns at any time without fear of retaliation. No one at UCCE Group is permitted to retaliate, threaten or attempt to retaliate against anyone who filed a report in good faith or who participated in an investigation.
- 1.12 Retaliation occurs when adverse action is taken against a person for reporting misconduct, participating in an investigation, refusing to participate in suspected improper activity or exercising workplace rights protected by law. Examples of retaliation include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 1.13 If you observe or suspect an act of retaliation, you must report the concern immediately through one of the available reporting channels as referenced above.

2. Our people and workplace environment

UCCE Group is committed to respecting internationally recognised human rights in line with the principles of the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We expect everyone involved in our business to conduct business activities with dignity and respect, and in a manner that safeguards and promotes responsible and ethical working practices, as set out below.

Minimum age and forced labour

- 2.1 UCCE Group is committed to ensuring that there is no modern slavery, or human trafficking, forced labour or child labour in its business or its supply chains and takes a robust approach to identifying modern slavery risks and taking steps to prevent it in its operations.
- 2.2 We will not employ any individual under the minimum employment age according to the local laws of the operating country, or, in the absence of law, under the minimum age for completing mandatory education. All staff performing work for UCCE Group should also meet these minimum age requirements.
- 2.3 Outside of the above, the use of hazardous child labour, and labour that potentially detracts a young person's development, education, and welfare is strictly prohibited.
- 2.4 Staff shall be free to terminate employment without penalty, given the provision of reasonable notice.
- 2.5 We will not withhold any government-issued identification, passports or work permits of staff.

Recruitment and employment

- 2.6 UCCE Group does not require employees to contribute to the costs of their recruitment, in line with the Employer Pays principles.
- 2.7 Hiring managers are responsible for ensuring that all employees possess the legal right to work and, where relevant, are in possession of a valid work permit issued by the relevant authority.
- 2.8 Understandable, written contracts of employment or engagement will be provided to all employees in accordance with national laws. These contracts will provide information on employees' rights and duties, including their remuneration and working hours.
- 2.9 Employment obligations shall not be avoided through excessive use of labour-only contracting, sub-contracting, apprenticeship or fixed term contracts.



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Prohibition of bullying and harassment

- 2.10** UCCE Group is committed to creating a safe and inclusive work environment which encourages respect for the dignity of individuals and is free from harassment, victimisation or bullying against people, including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies both in the workplace and any work-related setting outside the workplace, e.g. business trips, work-related events or social functions, or on social media, in recruitment or during employment.
- 2.11** UCCE Group is also committed to creating a work environment which is free from sexual harassment or victimisation and which ensures all staff are treated and treat others with respect and dignity. Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated.

Inclusion, diversity and fair treatment

- 2.12** UCCE Group actively embraces an environment that is inclusive of all staff and their unique abilities, strengths and differences. We respect diversity in each other, our customers, suppliers, and all others with whom we interact, ensuring we are an inclusive company.
- 2.13** We are committed to fair and equal opportunities and dignity at work and have local policies in place to support this. Our commitment spans from recruitment and selection, through training and development, compensation, appraisal and promotion, right up to retirement.
- 2.14** We treat everyone equally regardless of age, race, gender, gender reassignment, colour, ethnic or national origin, disability, hours of work, nationality, religion or belief, marital or civil partner status, disfigurement, political opinions, union membership, or sexual orientation.
- 2.15** All decisions relating to employment practices will be objective, free from bias, and based solely on work criteria and individual merit. In every set of circumstances, we aim to find the 'best fit' between personal requirements and business needs.

Suitable remuneration

- 2.16** We will ensure that all staff are compensated fairly and that the wages and benefits paid meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher.
- 2.17** Deductions from wages as a disciplinary measure shall not be permitted.

Working hours

- 2.18** Working hours will comply with national law and collective agreements, and are scheduled to enable us to deliver and meet our business commitments. Total working hours will be defined by contract and will not exceed those permissible by national law.
- 2.19** Overtime shall be voluntary and agreed in advance, and shall be compensated at a premium rate.
- 2.20** Rest periods and leave entitlement will be provided in accordance with national law and monitored.

Freedom of association

- 2.21** We will respect the rights of workers to associate or not to associate with any worker organisation, including joining or forming trade unions of their own choosing, and to bargain collectively, as permitted by, and in accordance with, all applicable laws and regulations within the operating country.

Respecting each other, our Customers and our Shareholders

- 2.22** All employees of UCCE Group work hard with the common aim of serving our customers. We are committed to providing a safe, accessible and inclusive workplace, promoting diversity and opportunity for growth for our people and the communities we serve. Doing the right thing, in the right way, is supported by respecting everyone we come into contact with and this behaviour helps us differentiate ourselves from our competitors.

Respecting each other

- 2.23** We are expected to treat each other with dignity and respect and UCCE Group expects staff to treat each other and our customers and other stakeholders in the same way. We all have a responsibility not to indirectly support unfair behaviour by ignoring what is happening around us.
- 2.24** It is Company policy to promote an inclusive environment, free from discrimination, harassment, and victimisation where everyone will receive equal treatment. For more information on our approach regarding inclusion and harassment, please refer to this Code's respective sections. The Company is committed to providing clear, honest and accurate communication directly to employees. This includes informing and consulting with employees in line with local requirements and ensuring everyone has an opportunity to voice opinions and ideas, get answers and have views represented when the business considers changes that affect its employees.

Respecting our customers

- 2.25** UCCE Group values the loyalty and confidence of our customers above all else.
- 2.26** We will not compromise the safety of our customers and will always strive to offer and live up to the highest possible standards of service and supply.
- 2.27** We will always try to ensure our labelling, advertising and other forms of customer communication are clear, honest and accurate and that our staff respect the cultural and ethical beliefs of our customers.
- 2.28** We welcome customer feedback and try, wherever possible, to act on it to continually improve the service we offer. We make sure any complaints are handled fairly and professionally within appropriate timescales.
- 2.29** We will ensure information that we hold about our customers is handled properly and responsibly. It is our joint responsibility to respect and protect our customers' personal data in line with the applicable laws.

Respecting our shareholders

- 2.30** UCCE Group is focused on building a sustainable business for the long term, generating value through consistent, profitable growth.
- 2.31** We keep honest and accurate records of our performance and are committed to high standards of governance and transparent reporting.
- 2.32** As an integral part of planning and review, we have an ongoing process in place for identifying, evaluating and managing the significant risks to achieving business goals, including a Risk Assessment Report completed in collaboration with UCCE employees and an external law firm in July 2025.

Health and safety in the workplace

- 2.33** Together, we have a responsibility to maintain a healthy and secure workplace.
- 2.34** The Company has a responsibility under legislation to protect the health, safety and welfare of all employees, customers and third parties on our premises.
- 2.35** Each UCCE Group business operates health and safety policies and regulations in accordance with local regulations and accreditation standards and is responsible for ensuring awareness of health and safety regulations. All accidents will be reported and escalated to the appropriate person or department.
- 2.36** All staff have a responsibility to comply with policies, safety rules and procedures. You are expected to take reasonable care of your own health and safety and the health and safety of others who may be affected by your actions or omissions.
- 2.37** Refer to your local Health and Safety Policy or contact your HR team for more details of workplace safety and employee requirements.

3. Our business integrity and safeguarding

We promote high standards of ethical conduct and ensure that all business activities are conducted with honesty and integrity. Everyone must comply with all applicable laws, regulations and requirements within their operating environment as set out below.

Anti-Bribery and Corruption (ABC)

- 3.1** UCCE Group takes a zero-tolerance approach to bribery and corruption, and is committed to acting professionally, fairly and with integrity in all business dealings and relationships. The consequences of violating the Group ABC Policy include disciplinary actions such as a warning, suspension, reduction in pay, demotion, or termination of employment.
- 3.2** The making or receiving of bribes or corrupt payments, in any form, is strictly prohibited, whether committed by employees or anyone else acting on the Company's behalf.
- 3.3** UCCE Group does not give, offer or accept improper payments, gifts, hospitality, or other benefit with the expectation that a business advantage will be received in return, or paid forward by UCCE Group.
- 3.4** Employees must not give or offer any payment (such as a 'facilitation payment') to a government official in any country to speed up a routine or necessary procedure.
- 3.5** Employees should not get involved in any business transactions that could result in personal gain or benefit.
- 3.6** Employees should monitor "red flag" indicators, and if identified, employees should report them promptly to line managers. Examples of "red flags" include: i) a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made; and ii) a third party requests an unexpected additional fee or commission to 'facilitate' a service.
- 3.7** UCCE Group will conduct reasonable and proportionate due diligence on new, existing or proposed "associated persons" (any parties operating for or on behalf of UCC). The Group ABC Policy sets out obligations required of employees, examples of bribery, and guidance regarding donations, lobbying, interacting with public officials and "associated persons", and identifying risk indicators. Employees should read and comply with this Policy.

Gifts and hospitality

- 3.8** All employees are required to follow the rules on gifts, hospitality and entertainment as set out in the Group ABC Policy. The Group ABC Policy does not prohibit the giving or receiving of reasonable and appropriate gifts or hospitality for legitimate purposes. Employees should make declarations, as recorded on the gift, hospitality and entertainment register, as outlined in the ABC Policy.
- 3.9** If you are in any doubt as to whether any conduct could amount to bribery or corruption or any other illegal activity, or if the conduct makes you feel uncomfortable, the matter should be referred to your local HR Director or a member of UCCE Group Board.

Conflicts of interest

- 3.10** A conflict of interest may emerge where your professional duties and your personal interests diverge. You should not put yourself in a position where you are involved in an activity for personal gain, to you, your family, or have other personal affairs which conflicts with the Company's interests. You should always have UCCE Group's interests at heart in everything you do in the course of your employment. Conflicts of interest can take many forms including, but not limited to:
 - a) involvement within recruitment decisions relating to your family or friends;
 - b) having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or UCCE Group partner or is seeking to become one;

- c) taking personal advantage of an opportunity that belongs to UCCE Group; or being engaged in a personal relationship with another staff member where one of the individuals has the ability to influence the other's terms and conditions of employment or performance management processes;
- d) engaging in a business relationship on behalf of UCCE Group where you or a family member has an interest in the other party, unless previously advised to, and agreed by, senior management or the European Board; and

3.11 Disclosures of conflicts of interest should be made on the Conflicts Register, and you must alert your line manager. Employees who make positive disclosures will be asked on an annual basis to review conflicts of interest. For further guidance on conflicts of interest, please refer to the Group Conflicts of Interest Policy, or discuss the situation with your line manager.

Expenses Policy

3.12 The Company will reimburse business expenses that are properly incurred, including the reasonable cost of necessary travel. Employees must submit claims in accordance with the local Expenses Policy. Any attempt to claim expenses fraudulently or otherwise in breach of the Expenses Policy may result in disciplinary action.

3.13 Employees are permitted to entertain actual or prospective customers only where your proposal and an appropriate budget have been agreed in advance with your line manager. Receipts must be submitted in full with your expenses claim. You must also ensure that the provision of any such hospitality complies with the Group ABC Policy.

Anti-Fraud

3.14 UCCE Group takes a zero-tolerance approach to fraud, and all employees are expected to act professionally, fairly, and with integrity in all business dealings and relationships. Employees behaviour that may be capable of fraud could result in dismissal for gross misconduct.

3.15 UCCE Group defines 'fraud' as any attempt to obtain financial benefits or other advantages through dishonest or deceptive means. Broadly, this includes theft, false accounting, falsification of records (including financial records such as spreadsheets), conspiracy, collusion, or attempting to do any of the foregoing and concealment of the foregoing. An obvious criminal motive is not required for a fraudulent behaviour to be made out.

3.16 The Company as an entity can be held legally responsible for certain fraud offences committed by parties operating for or on behalf of the business (associated persons), who should maintain the same high standards of conduct and anti-fraud processes as UCCE Group employee.

3.17 Staff must follow procedures when dealing with the Company's property, goods and cash. If you identify any "red flag" indicators of fraud, you should report them promptly to your line manager or via the SpeakUp whistleblowing channel. Examples of "red flags" include, amongst others, i) inconsistent accounting journal entries, for example frequent, unexpected corrections or adjustments to records, and ii) resistance or avoidant behaviour during times of internal or external audits, including the delay or withholding of information.

3.18 When dealing with financial transactions employee must also follow policies and rules, including but not limited to, the Group Anti-Fraud Policy, Invoice Authorisation Controls, Contract Approval Processes, CAPEX and Expenditure Approvals and the Expenses Policy. Employees should also conduct reasonable due diligence on any new or proposed "associated persons" or suppliers. Refer to your local policies, the Group Anti-Fraud Policy, or the Finance team for further information.

Anti-Facilitation of Tax Evasion

3.19 UCCE Group takes a zero-tolerance approach to facilitation of tax evasion, upholding all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the Criminal Finances Act 2017.

3.20 Tax evasion means the criminal offence of cheating the public revenue or fraudulently evading UK tax. Foreign tax evasion means evading tax in a foreign country, provided that conduct is an offence in that country and would be a criminal offence if committed in the UK. Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. It is not acceptable for you (or someone on your behalf) to:

- a) engage in any form of facilitating tax evasion or foreign tax evasion;
- b) aid, abet, counsel or procure the commission of a tax evasion offence or foreign tax evasion offence by another person;
- c) fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy;
- d) engage in any other activity that might lead to a breach of this policy; or
- e) threaten or retaliate against another individual who has refused to commit a tax evasion offence or a foreign tax evasion offence or who has raised concerns under this policy.

Books and record-keeping

3.21 You must maintain accurate and transparent books, records and accounts to verify compliance with all applicable laws and requirements. This includes reliability and accuracy of books and records, as well as full, fair, accurate, timely and understandable public disclosure. UCCE Group liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities must be fairly reflected in reasonable detail.

Financial accounting, internal controls and auditing matters

3.22 Concerns regarding accounting, internal controls or auditing matters should be promptly reported through the reporting mechanisms outlined in the Group Whistleblowing Policy. Reports may be made anonymously and will be treated in a confidential manner.

Data, confidentiality and company property

Confidentiality

3.23 UCCE Group information should be used only for company purposes and should not be disclosed to anyone outside of the UCCE Group. Confidential information includes information such as supplier information, UCCE Group technologies, recipes, formulas, coffee blends, business and marketing plans, internal company communications, and existing and future product information.

Personal data

3.24 UCCE Group is committed to handling personal information in line with data protection and privacy laws. Wherever you work in the business, you have an important part to play in enabling us to meet this commitment.

3.25 Local data protection and privacy policies set out the rules which all employees must follow when handling personal information. It will help you 'do the right thing' to protect yourself and our business, by protecting any personal information you handle.

3.26 It is your responsibility to ensure that all personal information is handled in compliance with data protection laws and the applicable policies. This applies to all information, held on computer or in hard/print copy files, from which a person could be identifiable. Beware of people trying to obtain information to which they are not entitled. Do not access personal data about people without appropriate authorisation, only use it for legitimate legal or business purposes and only hold the information as long as is necessary to carry out the business or legal task.

Use of information technology (IT)

- 3.27** The use of the Company's IT facilities are subject to your local IT and Digital Policy and the procedures aimed at protecting IT equipment, systems, networks and information including smart phones and other handheld devices.
- 3.28** Using IT equipment inappropriately can result in the security of these systems being vulnerable. You will find detailed guidance on the use of IT equipment, email and the internet in your local IT and Digital Policy. Failure to follow and adhere to this and other related policies, including the guidance for users of small mobile computing devices (smart phones and PDAs), may result in disciplinary action up to and including dismissal. Deliberate or serious breaches may lead to criminal prosecution.
- 3.29** Reduce the risk of theft, particularly of portable equipment, and damage and unauthorised access to computer systems by following Company procedures above and taking care of such equipment as if it was your own.

External relations

Lobbying and political engagement

- 3.30** Lobbying includes any oral or written communication, on behalf of UCCE Group, with a public official, their employees, or a public organisation to influence that person or organisation's decision-making on any policy matter (such as statutes, regulations, programs, contracts, grants, licenses, etc.).
- 3.31** Employees should contact, Legal Counsel through the Corporate Planning Office and obtain written approval before initiating any communication with such persons or organisations that may be, or may appear to constitute, lobbying.
- 3.32** Whilst lobbying is not always prohibited, in certain jurisdictions in which UCCE Group operates there are prescriptive rules and obligations regarding lobbying which must be accounted for prior to any conduct occurring which may, or may seem to, constitute lobbying.

Media relations

- 3.33** Media attention presents an opportunity for us to work with and through the media to communicate with our customers and stakeholders. It is important that we work in a co-ordinated way, with one voice; to get positive press coverage of our stories, products, people, and the contributions we make in our communities.
- 3.34** Handling the media in the right way requires sensitivity and skill, particularly if the media is to run balanced stories on the Company. Do not engage with the media unless trained and authorised to do so and refer to the appropriate department (Group Head of Communications) or in absence of this, your line manager.

Social media

- 3.35** UCCE Group recognises that its employees may use blogs, social media or social networking sites in their personal time, both in and outside of work.
- 3.36** These sites can be a useful and fun way to keep in touch with friends and colleagues. You should be aware that information posted on these sites is public and may be viewed by UCCE Group employees, customers, and industry contacts, including those located in other countries, as well as the media.
- 3.37** You have general obligations to act in the best interests of the Company and not to breach confidentiality or the relationship of trust and confidence.
- 3.38** This includes not posting inappropriate comments on blogs and social networking sites, for example about customers and other members of staff, resharing inappropriate content from other users or sharing company information that is confidential and/or commercially sensitive.
- 3.39** You are encouraged to consider carefully what you post. If in doubt, don't post it.



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Business Continuity

- 3.40** Each trading business across the European Group has a Business Continuity Plan, which aims to ensure we are fully prepared and equipped to continue business in the event of a crisis or disaster at any UCCE Group location, at any time.
- 3.41** This sets out the processes to be followed locally to recover and restart business after a crisis or disaster affecting the business (which may include, but is not limited to, incidents related to natural events, workforce, plant or supply chains, product safety, business infrastructure systems and processes).
- 3.42** You will have responsibilities towards business continuity, and your line manager will advise you of these following a major incident.

4. Sustaining our environment, community and supply chains

UCCE Group is committed to delivering sustainable value. We strive to be a fair and ethical partner that operates responsibly within our operating environment and supply chain, and we seek to enhance the lives of those who work for and with us, in line with our [UCC Sustainability Direction](#) and supporting policies.

We are committed to continuously improving all our sustainability efforts and your involvement and participation is essential to help the sustainable development of the Company and society, where people flourish and nature thrives.

Environmental responsibility

- 4.1** A successful, sustainable business depends on a healthy planet. To achieve our environmental goals to decarbonise our business operations, preserve natural resources and turn our waste into a valuable resource, the Company expects you to manage your activities, wherever practicable, to protect and minimise impact on the environment.
- 4.2** We are committed at all levels and within all functions of the organisation to continual improvement in our environmental performance. We also recognise this will only be achieved through your support and participation. This includes your support in the following areas:
- a) complying at a minimum with all environmental legislation, as well as other environmental requirements to which our organisation commits;
 - b) complying with the requirements of ISO14001 where it is in place and other industry standards;
 - c) continuously improving your environmental performance and integrate recognised environmental management best practice into your business activities, wherever applicable;
 - d) promoting efficient and sustainable use of natural resources, reducing consumption and increasing efforts in lowering our business's carbon footprint; and
 - e) preventing and managing waste generated from personal and business operations, according to the Waste Hierarchy principles of reduce, re-use, recycle and recover.

Our communities and supply chains

- 4.3** All our operating businesses across Europe are dedicated to creating a positive impact on society, enhancing and transforming lives and communities, as well as continuing our commitment to responsible sourcing practices in our global supply chains.
- 4.4** We support efforts to give back to our local communities through organised charitable activities, and employees are encouraged to get involved in these.
- 4.5** We will continue to be an active member of independent coffee certifications and associations that drive social, environmental and economic improvements in our coffee-sourcing regions.
- 4.6** We will also continue to work in partnership with our supplier partners to ensure they adhere at all times with the ethics and behaviours by which we operate, as set out in our UCC Europe Supplier Code of Conduct.



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5. Policy statement

- 5.1** UCC Europe is headquartered in the UK and there are legal requirements arising from this location. This Code of Ethics and Behaviours should be read in conjunction with the relevant Group Policies, which are based on UK policies. Individual countries will have local legislative requirements with which we must comply. In the absence of relevant local policies or legislation, our Group Policies will be applicable as a basic minimum requirement.
- 5.2** UCC Europe Limited reserves the right to update this Code and policies referred to therein.

Amendments

Date	Change	Responsible	Board Approval	Reissue	New Version
11/03/2021	Policy update	Group HR Director (M Cruice)	-	01/03/2021	
11/12/2025	Substantive update by external legal counsel (DLA Piper)	UCCE Board	15/12/2025	18/12/2025	C&L 01
19/08/2026	Minor update – CEO name updated and Internal Legal Counsel replaced with CPO	CEO, UCC Europe (T Sato)	-	19/08/2026	HR 01



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