

Purpose - Our Code of Conduct provides a summary of the actions and behaviours we expect colleagues to demonstrate in their day-to-day life with the Company to ensure we operate ethically and with integrity, and comply with our legal obligations.

Code of Conduct

Summary

The Code is part of every colleague's contract of employment, and we expect colleagues to comply with it. It is designed to help colleagues to carry out their role with due care and attention, honesty and to the best of their ability at all times. It links closely with a number of full policy documents, that themselves provide further information on the standards and requirements for our colleagues.

Updates to this Code, or related policies, will be made from time to time to ensure we meet our legal obligations and operational requirements. These will be communicated to colleagues, who should familiarise themselves with any changes and seek clarity from their manager if at any time they are unsure of the implications on them or their role.

Breaches to the Code of Conduct may result in disciplinary action up to and including, dismissal.

Key points

Legal Compliance & External Codes of Conduct

Colleagues are required to follow the Company's reasonable instructions to make sure we act within the law. Colleagues must be aware of and comply with the law(s) which are relevant to their job.

If colleagues are unsure, they should ask for advice from their manager, or the technical specialist for the relevant area, which could include the Legal, Tax, Pharmacy Management Team or People Teams.

To ensure our compliance with external laws and guidance, we have procedures in place to meet the needs of external codes of conduct. We will tell colleagues about these commitments and ask that they be observed where they are relevant to colleagues and their role.

Examples include:
Our Commercial Teams must

follow the Grocery Supply Code of Practice (GSCOP) and the Morrisons Ethical Trading Code. When dealing with suppliers, colleagues must meet the Morrisons Ethical Trading Code.

Our Pharmacy Teams must follow relevant laws, professional guidance and the NHS code of practice on confidentiality and data protection. Pharmacy Teams must also follow the GPhC Code of Practice on Conduct, Ethics and Performance and Responsible Pharmacist Guidance.

We observe certain codes of practice in relation to animal welfare.

Any other code of practice or commitment which a colleague's manager communicates.

Equality and Diversity

Equality and Diversity is about respecting difference. We will treat all colleagues, customers, job applicants, contractors, suppliers and visitors fairly, equally and with respect and

value the diverse skills and talent that different individuals can bring to our Company.

We will not tolerate any form of discrimination, victimisation, bullying or harassment on account of an individual's difference.

In addition to our business values, legislation also exists to legally protect the rights of individuals on the grounds of sex (including pregnancy), sexual orientation, religion or belief, marital status (including civil partnership status), age, race (including ethnic or national origin, colour or nationality) or disability. Further, a colleague should not be treated less favourably on account of working part time, being on a fixed term contract or being a trade union member.

Further detail is available in our Respect in the Workplace Policy.

Health and Safety

Colleagues have a duty to read and understand our Health and

Safety Policy, procedures and rules, and to follow any safety instructions and guidance that apply in their role. Colleagues are responsible for the care of themselves and other people who may be affected by their actions at work, including other colleagues, customers and visitors to sites and stores. It is everyone's responsibility to take care not to damage any of the Company's property or equipment.

Further details can be found in the colleague handbook and in the Keeping Colleagues Safe Guide.

Product Safety

We pride ourselves on providing customers with exceptional quality products. When we produce, distribute and sell our

Code of Conduct

products, colleagues are required to meet all the relevant legislation and regulations and follow all professional guidance and policies and procedures about product safety and quality.

Colleagues must make sure that they complete any records, accurately, fully, on time and that they meet relevant accounting and legal standards. Colleagues must not falsify or change the meaning of any record, report, entry or document, nor make it deliberately misleading, incomplete or leave out information.

Colleagues must put quality assurance and quality control of products into practice, making sure products are fit for their intended purpose.

We must demonstrate on a daily basis that we are complying with all relevant legislation and regulations regarding food safety. Colleagues must complete any records regarding food safety accurately, fully and

on time to meet the relevant legal standard.

This has to be done, properly, accurately and honestly. Colleagues must not falsify or change the meaning of any record, report, entry or document, or make it deliberately misleading, incomplete or leave out information. If it is found that a colleague has breached these guidelines it may lead to disciplinary action, up to and including dismissal.

Confidentiality

Colleagues are required to keep secret any confidential information (whether it is marked confidential or not) about the business of any Company in the Wm Morrison Supermarkets PLC Group ('Group Company') and not share it with anyone, unless they are allowed to know it or their duties or the law require colleagues to share that information.

This includes information about:

- Any of the Group Company's financial performance
- Trading performance, supplier's terms, profit margins, marketing and sales
 - Product and promotions development,
 - Colleague, customer or patient details,
 - All other Company information, whether or not it is marked confidential by the Company.

This restriction has no time limit but will not apply to information which becomes public, where written permission has been given by the Company or information which needs to be shared by law.

Colleagues should only make use of confidential information in the proper performance of their duties. Colleagues may not use confidential information in a way that harms any Group Company's interest.

Colleagues may not publish or provide any literature, communication, information or statement to the press, media or other third parties about the

Group Company unless colleagues have prior written permission to do so.

Company property, or property connected with the Company including documents, computer files, disks, prints or copies must not be removed or disclosed to any third party unless it is expressly agreed within your role or written permission has been obtained.

Bribery and Corruption

It's important to know that as a business and as individuals we must not engage in bribery or corrupt practices or tolerate them in our dealings or relationships with others.

We believe in operating our business ethically and with integrity and we have a zero-tolerance approach to bribery and corruption. We comply with all laws relevant to countering this type of activity in all the places in which we operate and in particular the Bribery Act 2010 within the UK.

We don't want any Morrisons colleague to be at risk of bribery allegations; and the Company can also be responsible for failing to prevent bribes and corrupt behaviour taking place.

To protect you and our business we have Anti-Bribery and Corruption policies and procedures which we all must follow.

If not followed, the result could be disciplinary action or even legal proceedings for the Company and for individuals. The punishment for breach of this legislation can be very large fines, but also imprisonment of up to 10 years for the people involved.

You can find the full policy documents on MyMorri which details what is expected of you, and how to raise any concerns.

Code of Conduct

Corporate hospitality/gifts

Morrisons has rules in place relating to receiving offers of corporate hospitality and/or gifts and gratuities from suppliers, customers or other third parties. There are processes that need to be followed in the event that hospitality and/or gifts are offered to you and further details are on MyMorri.

Conflicts of Interest

Colleagues are required to take steps to avoid potential conflicts of interest whilst working for the Company and after their employment has ended. Colleagues are required to:

- Promote the Company's interests and reputation and not make false or misleading statements about the Company, its suppliers or customers,
- not benefit unfairly from their employment or position with the Company,
- Avoid personal and business relationships in or out of work where these relationships place them in a potential

conflict of interest,

- Not, without the prior consent of their Manager and the business be employed by another organisation in addition to their employment with the Company.

In addition colleagues and their spouse, partner or family will not have any interest (excluding minor share holdings), membership or affiliation (without prior discussion and agreement with their Manager and the business) with an organisation, group, society or association whose interests and/or objectives could be considered as opposite to the Company's commercial or business interests.

It is expected that colleagues disclose to their manager any potential conflict of interest. Should it be deemed that the circumstances of the conflict of interest have an adverse bearing on their suitability for employment, we may consider the option of redeployment where available or in serious cases

consider terminating their employment if we are unable to remove the conflict.

Colleagues should be aware that in serious cases the Company may take legal action against them if they breach their contract, including for conflicts of interest where they have not followed our rules about disclosure, confidentiality, or secondary employment.

During their employment colleagues agree in the absence of the Company's written permission, (we will aim to be reasonable and consider requests on an individual basis), not to directly or indirectly, paid or unpaid:

Be employed or interested (excluding minor share holdings) in any other business or organisation in any other capacity, which is wholly or partly in competition with, in business with or a supplier to any Company within the Morrisons Group; or

Do anything which their manager reasonably considers

to be harmful to the interests of the Company.

Conflict of Interest Return

In order to comply with the Bribery Act 2010, we require colleagues in certain roles and areas of the business considered to be higher risk, to confirm on an annual basis that no conflicts of interest arise in their particular role. These colleagues must complete a Conflict of Interest Return.

If you are required to complete a Return, you must state whether there are any third parties that you deal with through work that you also have any personal or commercial relationship with beyond work. Failure to comply with this process could potentially lead to disciplinary action up to and including dismissal.

This information is needed so the Company can clearly understand what relationships exist with third parties, and so that any potential conflicts of interest can be openly discussed.

Contracts for services

Colleagues must only commit the Company to contracts for services which are within their job remit. Anyone who is unsure of their ability to perform such tasks should seek advice from their manager.

Securities trading

Colleagues may not use information or material that is non-public ('insider') information for theirs or anyone else's personal gain. Until insider information becomes public, colleagues may not trade in the Company stock or share the insider information with any other party.

Code of Conduct

Competition law

Morrisons and its competitors must compete independently at all times, in particular in relation to products sold and services offered to customers. Competition law prohibits the exchange of certain types of information between Morrisons and its competitors.

This applies to all our dealings with third parties, including our suppliers and wholesale customers. It also means there are strict limits on what information can be shared within our business, as Morrisons Wholesale handles information relating to companies which are competitors to Morrisons.

There are serious risks to both Morrisons and individual colleagues in failing to comply with competition laws:

- Morrisons could be fined up to 10% of its annual worldwide turnover
- Individuals convicted of involvement in cartel activity face fines and can be imprisoned for up to five years

It's vital that you follow our internal controls and procedures to ensure that you and the business stay safe.

Further information about complying with competition law and our processes can be found on MyMorri

E-mail, Internet and Communications

We encourage the use of appropriate forms of modern communication and research. To protect both colleagues and the business, colleagues are required to follow the Company's Policies when using technology such as computers, email and the internet during the course of their employment. If their role involves using e-mail or the internet, colleagues will receive full details of these policies when their access begins.

Sending offensive or defamatory material, whether inside or outside work (which includes social networking and blogging) that brings the Company name into disrepute, damages the Company or an individual's reputation, harasses, bullies,

discriminates or victimises colleagues or is deemed unacceptable to other colleagues or the business will be managed in accordance with our disciplinary procedure. The accessing or downloading of inappropriate or offensive material is also not permitted. Further detail is available in our Computer Use Policy and Social Media Policy.

Information

This policy has been authorised by the Group People Director.

We reserve the right to review, change or replace the content of this policy to reflect the changing needs of the business and/or to comply with new legislation.

Owner - Employee Relations
Last updated - 21/05/2021
Version control number - POL083