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Dear Colleague,

Our Purpose, Inspiring Food, Nourishing Life, is the reason we come to work every day and is key to why our customers choose to partner with us. It is engrained in our organisation and, coupled with Our Values, guides us to make the right decisions, to take ownership and to help drive the business forward.

Doing business with integrity is a fundamental priority and business results must always be achieved ethically and legally. This is critical to our long-term success, earns us the trust of all our stakeholders and ensures that we protect our reputation which remains one of our most important assets.

Our Code of Conduct is designed to help you understand your individual responsibilities and the standards and expectations for all Kerry Group colleagues. Regardless of your role, seniority or location, you are required to comply with our code and our policies and with all applicable laws, regulations and industry standards that relate to your work every day.

Whilst our Code of Conduct cannot cover every possible situation, it is a guide to the legal and ethical responsibilities which we share and points us to the additional resources available to support sound decision making. It is important that you always apply common sense and good judgement and act only in ways that support Our Purpose and Our Values. If you are ever in doubt, ask for guidance. I need you to show courage by speaking up. You will find further detail on how to ask for guidance and raise concerns in this document.

Only by working together can we achieve Our Vision of being our customers’ most valued partner, creating a world of sustainable nutrition. Behaving with integrity is part of who we are, and by doing so we will continue to deliver the high standards of business conduct that our customers, shareholders, partners and colleagues expect from us.

Thank you for your commitment.

Edmond Scanlon
Chief Executive Officer

Doing business with integrity is a fundamental priority and business results must always be achieved ethically and legally.
**Our Values**

Our Values guide us as we live our Purpose of Inspiring Food, Nourishing Life. They represent core strengths from our heritage and our ambitions for the future. They serve as our behavioural compass, keeping us on the right path and united across cultures and geographies, helping us to earn the trust and respect of our people, our customers and our communities.

<table>
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<tr>
<th><strong>Courage</strong></th>
<th><strong>Acting with courage</strong></th>
<th><strong>Ownership</strong></th>
<th><strong>Taking ownership</strong></th>
<th><strong>Inclusiveness</strong></th>
<th><strong>We role model inclusiveness</strong></th>
<th><strong>Open-mindedness</strong></th>
<th><strong>Practicing open-mindedness</strong></th>
<th><strong>Enterprising Spirit</strong></th>
<th><strong>Demonstrating our enterprising spirit</strong></th>
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| We’re brave, we speak up and we inspire each other to get the best results. | > We stand by the courage of our convictions as our integrity is not negotiable  
> We speak up and challenge the status quo  
> We make decisions | We’re accountable and we care about the business as if it were our own. | > We take personal responsibility for our own careers and Kerry as a whole  
> We strive to exceed expectations | We’re welcoming, we are authentic and we see strength in diversity. | > We know that we’re better together  
> We celebrate difference and partner to help customers and every colleague succeed | We’re curious, we innovate and we believe in possibility. | > We listen, remaining open to new ideas and ways of doing things  
> We seek new perspectives, learn from others, experiment | We’re bold, we think big picture, we add value and we grow. | > We look to the future and stay close to our markets  
> We achieve more when we work together end-to-end, building on today’s strengths and creating new opportunities | > We ask, ‘why?’ and ‘what if?’  
> We stay inspired | > We take calculated risks and seek out challenges  
> We remain resilient, remove obstacles, and make it easier and more valuable for customers to do business with Kerry |
Safety First, Quality Always

Safety First, Quality Always is our company-wide commitment to ensuring the safety of our people and our products.

People are our most important asset and keeping you safe and secure is our number one priority. Kerry Group has implemented a Group wide management system that defines safe and consistent ways of working and establishes standard requirements across all our facilities. All of us must follow safety procedures and promote a culture of safety. Everyone is empowered to take immediate action for people safety regardless of role, title or responsibility. If you see a situation that puts others at risk, take action, and at all times work to keep yourself and your co-workers injury free.

As the world’s leading taste and nutrition company, we strive to produce safe, high quality products and have stringent food and product safety requirements in place across the Group. Our customers and consumers trust that we ensure food safety throughout our supply chain from the ingredients we source, the processes we follow to the products we manufacture and distribute. We all play a part in helping ensure every process, every policy, every way of working delivers safe, quality food every day. Safety First, Quality Always is our company-wide commitment to ensuring the safety of our people and our products. We deliver the highest quality products, following rigorous food safety and quality end-to-end procedures from farm to fork, including robust preventative controls, sanitation, microbiological monitoring programmes, crisis management, continuous improvement through horizon scanning and embedding food safety best practices.

Our Safety First, Quality Always logo visually displays that people are at the heart of all we do, keeping our employees and consumers safe. The safety of both our people and our products are called out equally. The tick at the centre of the heart represents compliance to regulatory manufacturing guidelines and laws.
Expectations of employees

> Work to all defined processes and procedures designed to ensure people and food safety.

> Speak up immediately if product quality or safety issues are suspected.

> Promptly report accidents, incidents, near misses, breaches of policies, standards or laws, or any other risk to health, safety and security.

> Consider your own safety, the safety of your colleagues and the safety of our products in all your actions and decisions.

> Report any environmental risks or hazards.
A Guide to Our Code of Conduct

Our Code of Conduct (Code) represents our dedication to integrity and always doing the right thing. It is based on the basic principles of protecting our people, working with integrity, safeguarding our information and our assets and caring for our communities.

What is the Code of Conduct?
Kerry Group is dedicated to conducting business in accordance with the highest ethical standards. Our Code is intended to embody Our Purpose and Values and acts as a guide to help us:

> **Live Our Values** – by doing business the right way we maintain the trust we have built with our stakeholders.

> **Obey the law** – the guidance in our Code helps us to do our jobs in compliance with relevant laws and regulations in the countries in which we do business. Where differences exist between the Code and local laws or regulations, we should apply whichever sets the highest standard of behaviour.

> **Make ethical decisions** – sometimes the right thing to do isn’t obvious and whilst there is no replacement for common sense and good judgement, the Code helps us to understand rules and policies and provides direction as to where to find further detail if required.
Who does the Code apply to?
The Code applies to everyone who works for Kerry Group. This includes all employees, officers and Executive and non-Executive Directors of the company.

The responsibility for safeguarding the reputation of the Group as a trusted business rests with all of us. You are expected to demonstrate personal integrity, live the values and model the behaviours that underpin our work. Specifically, each employee is required to comply with the Code as well as all applicable policies, procedures, laws, regulations and standards. Failure to do so may result in reputational damage or financial loss to Kerry Group and could lead to disciplinary action being taken against you, up to and including dismissal, as well as potential civil and criminal liability.

Additionally, we also expect our suppliers to follow similar principles, as outlined in our separate Supplier Code of Conduct. Likewise, business partners who act on our behalf are similarly expected to share our commitment to the highest ethical standards. If you are responsible for a relationship with a business partner, you should make sure their commitments meet our standards.

The role of leaders
Our Code, policies and standards apply to everyone, whatever their role or seniority – but leaders are also expected to be role models. One of the core expectations of all people leaders in Kerry is the promotion of a positive work environment. All people leaders should ensure that their team members receive the guidance, resources and training they need to understand what’s expected of them.

You should:
> Live Our Values and stand up for what is right.
> Know our Code, policies and standards and ensure your team does too.
> Ensure that business objectives are never achieved through improper means.
> Coach your team on doing the right thing and encourage the right behaviours.
> Encourage the sharing of concerns and support employees who do.
> Ensure there is no retaliation for reporting concerns.
> Consult with the Legal or Ethics and Compliance Team immediately in relation to any possible breaches of compliance with the Code of Conduct.

Where to go for more information →
At the end of each key topic we have included a ‘Where to go for help’ section which will direct you to additional useful resources and contacts. All resources are available either on the Kerry Group intranet (MyKerry) or on the Kerry Group corporate website (www.kerrygroup.com).
We do the right thing. Every time. Everywhere.

We try to make it as simple as possible to follow the rules and whilst the Code of Conduct addresses many situations you may face on the job, it simply cannot address every specific situation or answer every question you may have.

We are trusted to make the right decisions by using common sense judgement aligned to Our Purpose, Vision and Values, guided by our policies.

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If the right thing to do is not clear or if you see or become aware of something that causes concern, ask yourself the following questions:

1. **Is it legal?**
   - **YES**
   - **NO / NOT SURE**

2. **Is it consistent with Kerry’s Values, Code of Conduct and relevant policies and procedures?**
   - **YES**
   - **NO / NOT SURE**

3. **Does it feel right?**
   - **YES**
   - **NO / NOT SURE**

4. **Would I be happy explaining what I did to my colleagues, friends and family?**
   - **YES**
   - **NO / NOT SURE**

If the answer to all these questions is ‘Yes’ then it is probably okay to proceed, but if you have any doubts, you should speak to your manager.

If the answer to any of these questions is no or not sure, then don’t proceed.

**STOP!** Seek advice and guidance.

It is always better to ask a question before acting. If you encounter a situation in which the right choice is unclear or there is conflicting information, seek guidance so you can take the right action. Find who to speak to for help or advice, and how to raise a concern on page 14.
We all need guidance in some situations – never be afraid to ask for help or support.
Help, Advice and Raising Concerns

The right decision may not always be clear – never be afraid to ask for help or guidance. When we all do the right thing, we build trust in Kerry Group and protect both ourselves and the organisation.

Our collective goal is always to prevent breaches of this Code but if you ever have concerns or doubts about certain behaviours or practices, speak up. We all have a responsibility to report any breaches or potential breaches of our Code, policies, standards or applicable laws. If you become aware or suspect that something is potentially illegal, unethical, unsafe or seems contrary to our Code, policies, standards or applicable laws, we encourage you to promptly report the matter so that a timely investigation and appropriate action can be taken.

**There are several ways to raise a concern**

There are a number of resources you can turn to if at any time you are unsure about the right course of action or wish to report an issue that concerns you:

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<tr>
<th>Contact</th>
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<tr>
<td>&gt; Your Line Manager</td>
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<tr>
<td>&gt; HR Partner</td>
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</table>
| > Member of the Ethics and Compliance Team  
(email: GlobalCompliance.KerryGroupLegal@kerry.com) |

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<tr>
<th>Use our confidential Speak Up service</th>
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<tr>
<td>&gt; The Speak Up Website can be accessed through the &quot;How do I...&quot; section on MyKerry or via the link on the home page of the Kerry Group website (<a href="http://www.kerrygroup.com">www.kerrygroup.com</a>) and the Kerry website (<a href="http://www.kerry.com">www.kerry.com</a>).</td>
</tr>
<tr>
<td>&gt; The Speak Up Call Centre – freephone Speak Up Call Centre telephone numbers are available in the “How do I...” section on MyKerry and in the Speak Up Call Centre Numbers section on page 46 of this document.</td>
</tr>
<tr>
<td>&gt; For more information, please refer to the Kerry Group Speak Up policy which is available in the &quot;How do I...&quot; section on MyKerry.</td>
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What is the Speak Up service?

The Speak Up service can be used to disclose suspected wrongdoings in good faith where there are reasonable grounds to believe that the disclosed information is true.

Wrongdoings should be understood as breaches of the law or Kerry Group’s policies. Examples include health and safety risks, harassment and discrimination.

The Speak Up service allows you to report a disclosure by phone or online and all reports will be dealt with in a confidential manner.

If you have a personal question outside of the above mentioned scope, regarding your career, projects, or any other question regarding your work at Kerry Group, please contact your Line Manager or HR Partner.

Who manages our Speak Up service?

The Speak Up service and website is operated on our behalf by a company independent of Kerry Group. This service provides a confidential online and freephone call service, 24 hours a day, 7 days a week. It is staffed by professional specialists and the service operates in over 100 languages.

What happens if I raise a concern through the Speak Up service?

Your concern will be forwarded to our Ethics and Compliance Team for investigation. Every report will be handled discreetly and professionally and in a confidential manner, to the extent reasonably possible and allowed by local laws.

Regardless of how you choose to report your concerns, the information you provide will be shared only with individuals who have a need to know or who are necessary to complete a thorough investigation and take any required remedial action.

Can I raise a concern anonymously?

The service allows you to remain anonymous, where allowed by the laws of your country. However, giving your name is likely to help the Ethics and Compliance Team investigate the concern you have raised, because it enables us to contact you if we have any questions or require further information.

Non-retaliation policy

We know that raising a concern can take courage, and sometimes you may be reluctant because you fear a reaction from your colleagues. We want our employees to feel supported and not have any fear of retaliation or reprisals. We are committed to ensuring that any employee who raises a concern is protected from any form of retaliation or reprisal. We have a strict policy (Kerry Group Speak Up policy) prohibiting retaliation or reprisal against any employee who reports a concern or assists in an investigation in good faith. You will also not be subject to disciplinary measures or incur any negative impact on your employment for reporting a concern or assisting in an investigation in good faith. If you have been subject to retaliation or reprisals of any kind from anyone in Kerry Group, you should immediately contact a HR Partner or the Ethics and Compliance Team or a lawyer in Group Legal as this is a potential violation of Kerry Group policy.
Protecting Our People

We are committed to promoting an environment where everyone feels valued and respected for their contributions and is free from intimidation and harassment.
Diversity, Inclusion and Belonging

We want our workforce to reflect the society in which we operate and to offer career opportunities for all colleagues without discrimination. Our ambition is to build a highly inclusive workplace where everyone can be at their best, contribute to our collective success and excel personally and professionally.

We recognise and celebrate diversity and create an inclusive environment where everyone feels respected, valued, encouraged to contribute, and feels confident that they belong at Kerry Group.

Diversity is about differences seen and unseen. It’s what makes each of us unique.

Inclusion is about leveraging our differences to achieve better business outcomes. It’s behaviours and ways of working that make us feel welcome.

Belonging is the feeling of being accepted and valued for who you are. When people feel they belong, they thrive.

Discrimination is different treatment of an individual or group. We do not tolerate discrimination of any kind at Kerry Group.

We treat our employees as individuals and follow all related laws in employment decisions and globally do not discriminate on basis of race, colour, religion, gender identity or description, sexual orientation, age, national origin, disability, veteran status, marital status, citizenship, political beliefs, or any other status.

We appreciate and value the dynamic mix of people who bring new perspectives, experiences and thought leadership to help Kerry Group continuously grow and innovate for our customers. We ensure all applicants are treated fairly and hiring decisions are based on objective criteria. We offer fair and equal opportunities for continuous personal and professional development and actively support our employees to fulfil their career ambitions with Kerry Group.

Expectations of employees

> Promote an open and supportive environment where everyone can bring their whole selves to work each day.

> Act as an ambassador for Kerry Group, helping to attract and retain diverse talent to reflect the regions and countries we work in.

> Ensure each other’s voices are heard, and that individual opinions and perspectives are recognised and valued in our teams.

Where to go for help
Relevant policies / additional guidelines:
Diversity, Inclusion and Belonging policy
Contacts: Human Resources
Preventing Bullying and Harassment

You deserve to work in a safe, professional atmosphere where you bring your authentic self to work to be at your best. Kerry has a zero-tolerance policy for harassment, bullying or violence of any kind which extends to our employees, contractors, customers, suppliers, and other business partners and covers verbal or written offences.

What is harassment?
Harassment is unwelcome conduct on the grounds of gender, civil status, family status, race, age, religion, sexual orientation, disability or any other category protected by law which has the purpose or effect of violating a person’s dignity and creating an intimidating, hostile or offensive environment for an individual.

What is bullying?
Bullying is inappropriate or unwelcome behaviours, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment which could reasonably be regarded as undermining a person’s right to dignity at work.

Examples of harassment/bullying might include:
> Shouting at, being sarcastic towards, ridiculing or demeaning others.
> Making physical or psychological threats.
> Overbearing supervision and making inappropriate and/or derogatory remarks.
> Abuse of authority or power by those in positions of seniority.
> Unjustifiably excluding colleagues from meetings/communications.

Behaviours that will not be tolerated:
> Harassing, sexually harassing, bullying, or threatening violence towards anyone.
> Threatening or retaliating against anyone who raises a concern.
> Making fake allegations of bullying or harassment.
> Jokes about violence.
> Carrying personal weapons on company property or in company vehicles.
What Would You Do?

Q

I can see that one of my colleagues is being picked on by other team members. I want to raise this, but I’m concerned that it might be my turn next. What should I do?

A

You should always challenge inappropriate or unacceptable behaviour. Speak to your Line Manager or local HR Team. If you do not feel comfortable doing this then use the Speak Up reporting service.

A colleague is clearly upset by other colleagues on our team telling jokes of a sexual nature. They don’t bother me, but should I say something anyway?

A

Jokes of a sexual nature may cause offence or embarrassment for all employees. Encourage your colleague to speak up, but if he doesn’t want to, talk to your manager or Human Resources or use the Speak Up reporting service.

My manager is very intimidating and often shouts, behaves aggressively and threatens team members. My colleagues and I all feel bullied, but aren’t sure what to do?

A

You should speak up. We do not tolerate bullying and expect managers to treat employees with respect. Speak to Human Resources, the Ethics and Compliance Team or use the Speak Up reporting service.

Where to go for help

Relevant policies / additional guidelines:
Bullying and Harassment-Free Workplace policy, Violence-Free Workplace policy

Contacts: Human Resources
Human Rights

We are committed to upholding and promoting internationally recognised human rights.

Our approach is based on the UN Guiding Principles on Business and Human Rights and our relevant policies are informed by a number of treaties and principles including the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work, the Children’s Rights and Business Principles, the UN Women’s Empowerment Principles and the approach laid out within the UN Global Compact to which we are a signatory.

All employees have a duty to respect human rights and to ensure that their actions do not infringe on the rights of others. Our human rights commitments extend across our business and broader value chain. Through our Supplier Code of Conduct we extend these commitments to our supply chain partners and all those who seek to do business with Kerry Group. More detail on our approach is available in our Human Rights Statement.

What does this mean?

> We treat everyone with dignity and respect and promote a diverse and inclusive workplace.

> We do not tolerate any form of unacceptable treatment including bullying, harassment, discrimination or offensive behaviour.

> We do not knowingly engage in any practices that infringe on the rights of others such as not complying with wage and hour laws, permitting the use of child or forced labour, or not respecting the choice to join or not join a union.

> We compensate fairly and match or exceed the minimum pay rates set by government or legislature in the countries in which we operate.

> We ensure that any external partners that we work with are aware and adopt Kerry Group’s requirements as laid out in our Supplier Code of Conduct.

Where to go for help

Relevant policies / additional guidelines:
Our Human Rights Statement and Human Rights policy, UN Guiding Principles, UN World Compact, Diversity, Inclusion and Belonging policy, Bullying and Harassment-Free Workplace policy, Violence-Free Workplace policy

Contacts: Human Resources, Line Management, Sustainability Team
Working with Integrity

We believe in doing what’s right and fostering trust with our business partners. We comply with all applicable laws wherever we do business.
Anti-Bribery and Corruption

A bribe is anything of value, including cash payments, gifts, entertainment or other business courtesies, given in an attempt to influence a person’s actions or decisions in order to obtain or retain business, or to secure an unfair business advantage.

At Kerry we have a zero tolerance for bribery and corruption. We comply with all anti-bribery and anti-corruption laws in the countries in which we operate, not only because it is our legal duty to do so, but also because we are committed to conducting business in an honest and ethical manner.

Engaging in bribery, or even appearing to engage in bribery, is inconsistent with Our Values. Such activity could do irreparable damage to Kerry’s reputation, and it could also expose you and Kerry to criminal liability. You must ensure that your actions could never be interpreted as bribery, particularly in the areas of gifts, hospitality, entertainment, expenses, customer travel, trade incentives, charitable donations and sponsorships.

Gifts and hospitality

The exchange of gifts and hospitality isn’t new to business and is a traditional way to express gratitude and build relationships with customers and suppliers. However, gifts and hospitality are problematic if they create actual or perceived conflicts of interest, or otherwise appear to influence a business decision.

It can be difficult to tell when a gift crosses the line, and laws and customs in different countries vary widely. A good guiding principle is to only give/accept a gift if it is modest in value and infrequent. Here are some tips to help you recognise if a gift is acceptable.

Guidelines for the giving and receiving of gifts and hospitality

> Never make decisions based on personal gain.
> Always make decisions based on Kerry’s best interests.
> Declare to your manager any matter that could influence or be perceived to influence your decisions or actions.
> Never give or receive any gifts or hospitality that creates, or could be perceived to create, a conflict of interest.
> Keep all receipts or records of the purchase of gifts and entertainment and records of the business partner’s acceptance of the gift or entertainment in compliance with their ethics policy.

Where to go for help

Relevant policies / additional guidelines: Anti-Bribery and Corruption policy, Gifts and Entertainment policy, Conflict of Interest policy

Contacts: Legal Team, Ethics and Compliance Team
Conflict of Interest

A conflict of interest occurs when our personal or business interests and actions somehow interfere or conflict with the business interests of Kerry, making it difficult to make objective and unbiased decisions.

We must avoid situations that create, or appear to create, a conflict between our personal interests and Kerry’s interests.

If you suspect a situation may lead to a conflict of interest, speak to your manager, Human Resources or a Kerry Group internal lawyer. Even the appearance of a conflict of interest may make others think you are acting improperly so by being transparent you remove any suspicion of impropriety. In many cases, disclosing the conflict will be enough to resolve the problem.

Some common examples of potential conflicts of interest include:

- Serving as an employee, officer or director of another company while employed by Kerry.
- Working for or receiving any personal or financial benefit from a competitor, supplier or customer of Kerry while employed by Kerry.
- Conducting Kerry business with a family member or with a family member’s business.
- Hiring or supervising a family member or someone with whom you have a close relationship.
What Would You Do?

Q

There is an opening in your department, and you think your sister would be suitable. You are worried about suggesting her, given your close family relationship.

Your department is looking for a new supplier and your nephew tells you that his business has replied to the tender.

You have been asked to be a director of a company which is not competing with Kerry, but you know it will possibly require your time during normal working hours.

A

If your sister is qualified and suitable for the position you should disclose your relationship to the Hiring Manager and Human Resources. Additionally, you should not be involved in the recruitment process and you should not be a supervisor of the position.

You must disclose this information and the relationship to your manager and you must exclude yourself from the tender process and the decision-making process.

There is a risk that your commitments to Kerry will be impacted by your appointment as a director of another company and this could be seen to be a conflict of interest. Such a role is considered as a selective outside activity and written approval from your Line Manager must be secured in advance of acceptance.
We are committed to free and fair competition and to succeeding through our outstanding products and services and not through unlawful or unethical business practices. We comply with all competition laws (known as anti-trust laws in some countries) to protect and promote free and fair competition and which regulate dealings with competitors, customers, suppliers, distributors and other third parties.

**As an employee, you must never:**

> Engage in any kind of formal or informal agreements or discussions with competitors to fix prices or other commercial terms, allocate markets, products or customers, limit production, refuse to deal with any customer or supplier, or discuss commercially sensitive information with competitors (e.g. pricing, costs, margins, trading terms, marketing plans).

> Enter into agreements with customers or distributors that could restrict competition.

> Use a trade association for discussions or agreements with competitors about customers or commercial issues (e.g. pricing, customers, terms of sale or markets).

Kerry values and protects its confidential information and we must respect other companies’ confidential information. We can only collect, share, or use competitor information if done in a legal and ethical manner (e.g. competitive intelligence through publicly available information such as public filings and news articles). We can also collect competitor information from a third party, if the third party has legally obtained the information and can legally disclose such information.

The consequences of violating competition laws can be very serious for both Kerry and you – it can lead to substantial fines and even imprisonment.
What Would You Do?

Q

You are at a meeting with a customer when they say Kerry must be more competitive and they show you a competitor’s price list, costs and vendor list.

You meet a former colleague who works with a competitor and he/she starts discussing their company’s prices.

A

Refuse the information and tell them that it is not appropriate for you to have access to a competitor’s commercially sensitive information. You should then immediately report the incident to your Line Manager or a Kerry Group internal lawyer. Do not make any notes on what you saw, or disclose any details to anyone at Kerry.

Tell the former colleague that it is not appropriate for you to know a competitor’s commercially sensitive information and this could subject both you and Kerry to serious criminal or civil charges because price fixing is illegal. Immediately report the incident to your Line Manager or a Kerry Group internal lawyer. Do not make any notes on what was said, or disclose any details to anyone at Kerry.
Insider Trading

Inside Information is information that could significantly impact a company’s share price and is not known to the general public.

As a publicly traded company, we follow many rules and regulations to ensure Kerry Group’s shares are traded fairly using information that is transparent and equally available to all investors. As a result, we have a policy that employees should not trade Kerry Group shares (or the shares of any other listed company) when they are in possession of Inside Information. Some employees in key roles need to obtain preclearance before trading Kerry Group shares, irrespective of whether or not they are in possession of Inside Information.

As employees, we may learn information about our company, or companies we work with, that isn’t known by the public but, if it was, would be likely to have a significant effect on the price of Kerry Group shares or the price of other listed companies’ shares. That knowledge is Inside Information and trading shares on this Inside Information is against the law. Examples include, but are not limited to:

> Quarterly, interim, or annual results for the company.
> Non-public information about mergers, acquisitions or divestitures.
> Appointments or resignations of Executive Directors.
> Major contract wins or losses.
> Purchase or sale of a significant asset.

Play it safe – do not trade Kerry shares if you are in any doubt.

Employees must not trade or encourage others to trade Kerry Group shares when they are in possession of Inside Information.

Employees must not disclose to a third party any confidential information about Kerry Group (including any Inside Information) except where they are required to do so as part of their employment or duty.

Employees who are subject to preclearance requirement should not trade Kerry shares unless and until the required preclearance has been obtained.

If you have any questions about this policy, or if you are not sure whether you can trade Kerry Group shares at a particular time, contact the Company Secretary with your query.

Where to go for help →

Relevant policies / additional guidelines:
Dealing in Securities policy
Contacts: Company Secretary, Group Financial Controller, Investor Relations
Sanctions and Trade Controls

We also comply with international economic sanctions and trade embargos that are put in place by recognised authorities. Sanctions can take different forms, including financial sanctions, asset freezes, travel bans and import/export bans – they can change frequently and on short notice.

Where to go for help

Relevant policies / additional guidelines: Sanctions and Trade Controls policy
Contacts: Legal Team, Country Financial Compliance Team

Trade controls help prevent trade in prohibited and harmful goods like drugs, unlicensed arms, fake pharmaceuticals, endangered animal species and pirated products.

As a global business we move goods (ingredients, finished product, equipment etc.) across international borders as part of our day-to-day operations, and we comply with all relevant laws and regulations, including trade controls.

What does this mean?

Kerry will never do business, directly or indirectly, with persons, entities, governments or states if doing so fails to respect existing sanctions.

It is extremely important that we know the identity of our customers, vendors and other business partners.
Money laundering is an attempt by individuals or organisations to hide the proceeds of their crimes by converting them into assets that look legitimate.

Money laundering is against the law and at Kerry Group we act responsibly to mitigate the risk of becoming associated – however innocently – with the criminal activities of others.

All employees must be vigilant and exercise good judgment when dealing with unusual transactions.

We all need to be vigilant to potentially suspicious transactions, such as the following:

> Irregularities in the way payments are made or requests to make an overpayment.
> Payments made in currencies other than that specified in the invoice.
> Attempts to make unusually large payments in cash or cash equivalents.
> Payments made by someone not a party to the contract (unless approved) or payments to/from an account other than the normal business relationship account.
> Requests to make payments for each invoice or group of invoices by multiple cheques or drafts.

Where to go for help

Relevant policies / additional guidelines: Anti-Money Laundering policy

Contacts: Legal Team, Treasury and Financial Control Teams, Country Financial Compliance Team, Ethics and Compliance Team

Expectations of employees

> Be proactive when it comes to spotting financial transactions that might signal a problem.
> Always report your concern if you see or suspect an activity or transaction that is outside the normal process.
Our financial reports must contain full, fair, accurate, timely and understandable information. It is required by law, and it is the right thing to do.

Everyone at Kerry Group has a role to play in keeping accurate financial records, storing those records appropriately, and ensuring company funds are used in an appropriate manner and in line with legal, accounting, tax and other regulatory requirements.

As with all other Kerry information, we take a consistent and organised approach to storing company financial records for the appropriate amount of time, retaining files that should not be destroyed, and securely disposing of old records to comply with the law and minimise the risk of information falling into the wrong hands.

You are expected to:

→ Make sure all financial records are complete and accurate.
→ Fully cooperate with any internal or external auditors or investigators who request information in connection with an audit of our company.
→ Respect and ensure Kerry’s resources are appropriately managed.
→ Ensure Kerry complies with external financial reporting requirements and timelines.

Where to go for help ⇒

Relevant policies / additional guidelines:
- Records Management and Retention policy
- Financial Integrity and Responsibility policy
- relevant Global Finance, Treasury and Tax policies

Contacts:
- Group Finance, Group Tax,
- Country Financial Compliance Team,
- Internal Audit
Working with Third Parties

We set high standards for how we conduct our operations, and that extends to all our interactions with our customers, suppliers and business partners (e.g. vendors, contractors, consultants, agents and other providers of goods and services).

Specifically, we expect suppliers to conduct business responsibly, with integrity and transparency. Furthermore, we expect suppliers to treat their employees fairly, honestly and with respect. Our Supplier Code of Conduct sets out the minimum standards we expect of suppliers and their suppliers/approved sub-contractors. We encourage all suppliers to go beyond these requirements. The principles set out in the Supplier Code of Conduct form part of the supplier selection process. Kerry could face legal action or reputational damage if third parties fail to comply with these standards.

Expectations of employees who work with Kerry suppliers and business partners:

> Read and understand the Supplier Code of Conduct and consult your manager if you have any questions.

> Notify your manager if you know or suspect that third parties are not meeting relevant requirements.

> Ensure that any selection, shortlisting or tendering processes for new third parties consider their compliance with the Supplier Code of Conduct.

Where to go for help

Relevant policies / additional guidelines:
Kerry Group Supplier Code of Conduct, Anti-Bribery and Corruption policy, Conflict of Interest policy, Gifts and Entertainment policy, Anti-Money Laundering policy, Sanctions and Trade Controls policy

Contacts: Global Procurement, Legal Team, Ethics and Compliance Team
Responsible Political Engagement

Communicating with government officials, state agencies and regulators in our markets is an important part of business.

We do this to inform them of our position on issues that affect our customers and our colleagues. It helps to increase our understanding of issues and helps us engage in relevant policy and regulatory debates.

Kerry Group is a non-partisan organisation. We do not have any political party affiliations and we do not support political parties either directly or indirectly. Kerry Group, or its businesses, do not make financial contributions to political parties, political candidates or public officials.

What does this mean?

> Kerry companies and employees are required to comply with all applicable laws and regulations.

> Only certain individuals who fully understand the regulations and our corporate position on key topics may engage with government officials on behalf of Kerry Group.

Where to go for help

Relevant policies / additional guidelines:
Responsible Political Engagement policy

Contacts: Legal Team, Corporate Affairs
Safeguarding our Information and Assets

We all have a responsibility to protect the assets of the Group. You should only speak on behalf of Kerry Group if you are authorised to do so and must always follow our policies when representing the company.
Physical and Intellectual Property

Employees are entrusted with Kerry property and resources, ranging from Kerry’s intellectual property (IP) to company equipment and tools and must take every step necessary to safeguard them.

Intellectual Property (IP)

Intellectual Property is intangible property such as registered IP (patents, trademarks, copyrights, etc) and know-how (recipe formulation, manufacturing process, foundational technologies, etc.).

Kerry Group’s innovative technologies and know-how differentiate us from our competitors and help us be successful. Intellectual property is embedded in all aspects of our business and is among Kerry Group’s most valuable assets. It is critical that we protect this IP and all employees have an important role to play.

Physical property

Equipment and tools are provided to employees to help you do your job. Kerry Group trusts you as an employee to respect and care for this physical property. We must work together to prevent theft, destruction and inappropriate use of this equipment and physical property.

Expectations of employees

> Only use Kerry’s property and resources in a way that is reasonable, lawful and appropriate, and never use, take, sell, lend, borrow or give away without proper authorisation.

> Keep company assets and property in good working condition and notify a manager if company property needs replacement or repair.

> Immediately report any suspicions regarding theft or loss of company property.

Where to go for help

Relevant policies / additional guidelines:
Intellectual Property policy, Confidential Information policy, Physical Property policy

Contacts: Kerry Group Intellectual Property (KGIP) Team, Legal Team, Human Resources
Protecting Confidential Information

Confidential information is information that is not available to the public, but we have access to as employees of Kerry Group.

Kerry’s information is an asset which needs to be protected and managed effectively. If confidential information is shared outside Kerry it could hurt us competitively, affect our financial results or damage our reputation.

We are all responsible for proper handling of confidential information to prevent loss or damage through accidental, negligent, or deliberate actions. Do your part to safeguard and protect our information and information entrusted to us by employees, customers, and business partners.

Where to go for help

Relevant policies / additional guidelines:
Confidential Information policy, Intellectual Property policy, Information Security policy, Physical Security policy

Contacts: Kerry Group Intellectual Property (KGIP) Team, Legal Team, Human Resources, ICT Security

Expectations of employees

> Classify all Kerry information not in the public domain, using the classifications as defined in our Information Security Policy.

> Do not leave confidential information, computers, tablets, flash drives or mobile phones unattended.

> Take personal responsibility for the proper use, circulation, retention, protection and disposal of Kerry’s information.

> Only discuss with and give access to confidential information to those who need it to do their job and ensure that any confidential information has appropriate access controls.

> When people join, move or leave the company ensure their information access requirements are correctly provided, changed or removed.
Protecting Personal Data

Protecting personal data and respecting the privacy of all individuals for whom we process personal data is critical.

As part of our role some of us have access to personal data about colleagues, customers, suppliers, consumers, shareholders or other individuals. Any personal data which we hold, or which others collect, hold or process for us, or to which we have access, must only be used for Kerry business purposes.

Sensitive personal data relating to an individual’s health, race, ethnic origin, political opinions, moral or religious beliefs, sexual life, or criminal activity needs to be handled with particular care.

Guidelines for the processing of personal data:
> Collect only as much personal data as is required.
> Ensure personal data is accurately collated.
> Store personal data securely and limit access.
> Destroy personal data when it is no longer required.
> Do not use personal data for anything other than agreed business purposes.
> Do not share personal data with any 3rd party without having appropriate safeguards in place.
> Do not leave any personal data unattended or unsecured.

Where to go for help ➔

Relevant policies / additional guidelines:
Employee Data Protection policy, Data Protection Standards policy

Contacts: Group Data Protection Team, Human Resources, ICT Security
Use of Information Technology

Kerry Group provides employees with a variety of technology and electronic communication resources to allow us to do our jobs. We are expected to use these tools responsibly and securely in compliance with all relevant laws and regulations.

Important ICT guidelines include:

> Personal use is permitted provided it is compliant with ICT Information Security policy and does not impact on overall performance.

> You are responsible for the security, use, safekeeping and, where appropriate, the safe return of all ICT resources and devices issued to you.

> E-mail, instant messaging (IM) and social communications services are business tools. Kerry reserves the right to review the contents of e-mails and instant messages to ensure compliance with policy, regulatory and legal requirements.

> Never intentionally browse websites containing illegal or inappropriate content.

> Never install illegal, unlicensed or unauthorised software on your PC/laptop or other Kerry device.

Expectations of employees

> Use strong passwords and keep these and your user identifications secure and private.

> Never share your account passwords with anyone, and don't use another person's password or user account, even if they have left the organisation.

> When in a public place (e.g. cafes, airports or train stations), do not work on anything potentially confidential if there is a risk that information could be inadvertently disclosed.

> Do not store or process Kerry data on a non-approved device.

> If you think you may have clicked on a malicious link or shared your password, please change your password and inform the ICT service desk.

Where to go for help

Relevant policies / additional guidelines:
ICT Security policy

Contacts:
ICT Security
External Communications and Social Media

We are proud of our work at Kerry Group and may want to share work stories or photos with friends, family or on social networks. We have guidance in place to help make sure that you share appropriately and only with the right people.

All forms of external communications (e.g. interacting with the media, presenting at events and posting on social media) shape how the public sees Kerry Group and affects our reputation. In a world where news travels fast, please be careful to manage how and what you communicate to protect our reputation.

As such, it is important to be clear about who is authorised to interact with the media and the expectations that apply to social media use.

**Media Communications**

News releases and contact with the media and journalists allow us to update stakeholders about our business and help fulfil our communication obligations as a publicly listed company. Because of this, Kerry has designated employees with specialist skills and experience who are responsible for communicating with the media and financial analysts.

Employees should direct members of the media to the appropriate Kerry Group employees rather than provide any information directly to the media.

**Social media**

We recognise that social media provides a powerful tool to engage with our stakeholders and we have a team who manage news via our corporate social media channels including LinkedIn, Facebook and Instagram.

If you decide to comment about Kerry, our brands, or any other information that relates to Kerry on your personal social media accounts take extra care. Also be careful not to disclose anything confidential and always use good judgement and be respectful.

**Four rules for external communications:**

- Do not communicate with the media or journalists on Kerry’s behalf unless you are authorised to do so. Pass any media queries to the Corporate Affairs Team.
- Seek approval with your regional communication lead before accepting an invitation to speak at an event on behalf of Kerry.
- Never disclose confidential or sensitive information.
- Social Media: be nice, have fun and connect.

Where to go for help

Relevant policies / additional guidelines:
- Media and Press Communications policy
- Social Media policy

Contacts:
- Corporate Affairs, Human Resources, Investor Relations
Kerry Group is committed to delivering sustainable nutrition by creating food and beverage solutions that contribute to good health while protecting people and the planet.
As the global leader in Taste & Nutrition, with the scale to make an impact, Kerry Group is committed to playing its part with our Beyond the Horizon strategy.

Feeding a growing global population while maintaining human and planetary health presents a huge challenge for our industry. As part of Our Vision we see the possibility for a world of sustainable nutrition, one that contributes to good health while protecting people and the planet.

Employees are the champions of our sustainability efforts and support initiatives that help us lead rather than comply.

Our commitments are outlined in our Environmental Responsibility policy, and we expect all those we do business with to uphold the same high standards of environmental responsibility as Kerry.

Expectations of employees
> Where you encounter unsustainable behaviours like wasting water or other resources, or the failure to consider environmental impacts of business decisions, we encourage you to speak up and challenge these practices.
> When engaging with suppliers and other partners you should seek to work with those who have strong sustainability commitments in place and who are striving to reduce any adverse impact on the planet.

Where to go for help →
Relevant policies / additional guidelines
Environmental Responsibility policy,
Sustainability Section of Corporate Website,
Supplier Code of Conduct
Contacts: QSHE, Sustainability Team
Nourishing Communities

Kerry Group has a proud record of supporting community initiatives and charitable causes.

We recognise the value of participating in and promoting development programmes and building good relations with and making meaningful contributions to the communities where we operate.

We operate both a group-wide programme of social impact partnerships with NGO’s as well as the Kerry MyCommunity Programme to enable resources and volunteer efforts to be activated to support initiatives around food, nutrition and health across Kerry sites worldwide.

We act with integrity when supporting charitable causes and ensure that our contributions are transparent, are made in accordance with applicable laws and are never given to gain an unfair business advantage.

We encourage all employees to take advantage of the Group’s volunteering policy of one day paid volunteering per year, for all employees, either with a Kerry programme or a community initiative in their local area.

Where to go for help

Relevant policies / additional guidelines:
Sustainability Section of Corporate Website
Contacts: Corporate Affairs, Sustainability Team
Speak Up Service
Contact Details
## Speak Up Service Contact Details

<table>
<thead>
<tr>
<th>Country</th>
<th>Telephone number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>0800-345-3156</td>
</tr>
<tr>
<td>Australia</td>
<td>1800 512 184</td>
</tr>
<tr>
<td>Austria</td>
<td>0800 068789</td>
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<tr>
<td>Belarus</td>
<td>8 820 0321 0424</td>
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<tr>
<td>Belgium</td>
<td>0800 76 410</td>
</tr>
<tr>
<td>Brazil</td>
<td>0800 000 0226</td>
</tr>
<tr>
<td>Canada</td>
<td>(833) 674-1737</td>
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<tr>
<td>Chile</td>
<td>800 681 003</td>
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<tr>
<td>China</td>
<td>400 120 0187</td>
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<tr>
<td>Colombia</td>
<td>018005190510</td>
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<tr>
<td>Costa Rica</td>
<td>0800-032-0037</td>
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<tr>
<td>Czech Republic</td>
<td>800 144 526</td>
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<tr>
<td>Denmark</td>
<td>80 83 01 42</td>
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<td>Egypt</td>
<td>0800 006 0272</td>
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<td>France</td>
<td>0 800 99 02 84</td>
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<td>Germany</td>
<td>0800 1821076</td>
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<tr>
<td>Greece</td>
<td>800 848 1073</td>
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<tr>
<td>Hong Kong</td>
<td>800 930 164</td>
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<tr>
<td>Hungary</td>
<td>06 80 088 409</td>
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<td>India</td>
<td>000 800 919 1309</td>
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<td>Indonesia</td>
<td>0800 1503228</td>
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<tr>
<td>Ireland</td>
<td>1800 851 698</td>
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<tr>
<td>Israel</td>
<td>1-809-399-861</td>
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<tr>
<td>Italy (includes San Marino, Vatican City)</td>
<td>800 761 605</td>
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<tr>
<td>Japan</td>
<td>0800-300-3046</td>
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<tr>
<td>Kenya</td>
<td>0800 211 255</td>
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<tr>
<td>Luxembourg</td>
<td>800 27 365</td>
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<tr>
<td>Malaysia</td>
<td>1-800-81-9265</td>
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<td>Mexico</td>
<td>800 681 8174</td>
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<td>Netherlands</td>
<td>08000249503</td>
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<td>0800 715 007</td>
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<tr>
<td>Peru</td>
<td>(0800) 78568</td>
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<td>Philippines</td>
<td>1800 1322 0012</td>
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<td>Poland</td>
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<td>0800 890 384</td>
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<tr>
<td>Russia</td>
<td>8 (800) 301-84-32</td>
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<td>Saudi Arabia</td>
<td>800 850 0347</td>
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<td>Singapore</td>
<td>800 492 2512</td>
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<td>South Africa</td>
<td>080 098 3863</td>
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<td>Spain</td>
<td>900 963 257</td>
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<td>Sweden</td>
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<td>Turkey</td>
<td>08006212331</td>
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<td>Ukraine</td>
<td>0800 801 458</td>
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<td>United Arab Emirates</td>
<td>800 035704313</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>0800 090 3693</td>
</tr>
<tr>
<td>United States</td>
<td>(833) 674-1737</td>
</tr>
<tr>
<td>Vietnam</td>
<td>1800400552</td>
</tr>
</tbody>
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For the following countries, from an outside line dial the access code and at the prompt dial the telephone number.

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<thead>
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<th>Country</th>
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<th>Access code 2</th>
<th>Telephone number</th>
</tr>
</thead>
<tbody>
<tr>
<td>El Salvador</td>
<td>800-1785</td>
<td></td>
<td>(833) 674-1737</td>
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<tr>
<td>Guatemala</td>
<td>999-9190</td>
<td></td>
<td>(833) 674-1737</td>
</tr>
<tr>
<td>Nicaragua</td>
<td>1-800-0164</td>
<td>1-800-0174</td>
<td>(833) 674-1737</td>
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<tr>
<td>Nigeria</td>
<td>0-708-060-1816</td>
<td></td>
<td>(833) 674-1737</td>
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<tr>
<td>Panama</td>
<td>1-800-0164</td>
<td>1-800-0174</td>
<td>(833) 674-1737</td>
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<tr>
<td>Venezuela</td>
<td>0-800-225-5288</td>
<td>0-800-552-6288</td>
<td>(833) 674-1737</td>
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