

CODE OF CONDUCT

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1. INTRODUCTION

1.1. Code of Business Conduct

The Code of Business Conduct applies to everyone working for Super Serv, without exception. This includes all staff and is regardless of location, role or level of seniority. We each have a responsibility to make ourselves aware of the contents of the Code of Business Conduct and if there is anything you are not sure about, you should speak to your immediate Manager. Each of us should make sure that we fully understand what is expected from us in our roles and how the policies contained in the Code of Business Conduct apply to us.

If you are engaging any third party to act on behalf of Super Serv, it is your responsibility to ensure that they are made aware of the Code of Business Conduct and that they agree to act in accordance with it. Where possible, you should seek a contractual obligation from them to comply with the Code of Business Conduct and you should actively manage the third party to ensure that they continue to act in accordance with it. Any breaches of the Code of Business Conduct by third parties or examples of behaviour inconsistent with the Super Serv Values should be reported to your immediate Manager. You should seek to eradicate any such behaviour and where necessary, consider terminating the relationship.

Please also remember that the appointment of professional advisors or consultants must first be approved by the Director Board.

All employees are required to follow the Code of Business Conduct and the policies contained in it . A failure to follow the Code of Business Conduct may result in disciplinary action up to, and including, dismissal.

1.2. Getting Help and Advice

It may feel easier to remain silent or ignore unethical behaviour but our commitment to integrity means that none of us should ignore a legal or ethical issue that should be addressed.

Each of us has a responsibility to report any potential or actual breaches of the Code of Business Conduct or any behaviour which is contrary to Super Serv Values and business principles. This duty applies whether it is you directly or if you become aware of an issue involving a colleague or a third party connected with Super Serv.

Where possible, you should firstly consider talking to your immediate Manager about any legal or business conduct issue. If you are uncomfortable talking to your immediate Manager or it is not appropriate in the circumstances, you can also get advice and guidance from:

1. HR manager
2. Mobile HR team
3. Senior Management team/ Operations Team/ Planning Team

2. VISION AND VALUES

Our vision and values capture in words the spirit of Super Serv and what we stand for. They guide the decisions, actions and behaviours of our people.

OUR VISION - *What we want to be*

To be a world-class provider of foodservice and support services, renowned for our great people, our great service and our great results.

OUR MISSION - *How we are going to achieve this*

Everyone in Super Serv is committed to consistently delivering superior service in the most efficient way for the shared benefit of our customers, suppliers and employees.

OUR GUIDING PRINCIPLES - *What guides our decision making*

1. **Safety, health and environment first** - Never to compromise on health and safety of our customers and our employees, and to manage responsibly the impact that our business has on the environment.
2. **Delivering for consumers** - Earn the continued loyalty of our customers by consistently demonstrating why we are the first choice for quality, service, value and innovation.
3. **Developing our people and valuing diversity** - To recognize the contribution and diversity of our people. We create a work environment that is challenging and provides the opportunities and support for everyone to develop, learn and succeed.
4. **Constant focus on performance and efficiency** - To deliver the highest quality and performance, whilst relentlessly driving to be the lowest cost, most efficient provider.

OUR VALUES - *What we collectively believe in and guide our behaviors*

1. **Openness, Trust and Integrity** - Set the highest ethical and professional standards at all times. We want all our relationships to be based on honesty, respect, fairness and a commitment to open dialogue and transparency.
2. **Passion for Quality** - We are passionate about delivering superior food and service and take pride in achieving this. We look to replicate success, learn from mistakes, and develop the ideas, innovation and practices that will help us improve and lead our market.
3. **Win through Teamwork** - We encourage individual ownership, but work as a team. We value the expertise, individuality and contribution of all colleagues, working in support of each other and readily sharing good practice, in pursuit of shared goals.
4. **Responsibility** - We take responsibility for our actions, individually and as a group. Everyday, everywhere we look to make a positive contribution to the health and wellbeing of our customers, the communities we work in and the world we live in.
5. **We Can** - We take a positive and commercially aware "we can" approach to all opportunities and challenges we face.

3. THE SUPER SERVICE

Super Serv prides itself on its great food and great service. We believe in grooming our own cooks and chefs creating a unique culture within the organisation driving us to be the best in the industry.

The menus and dishes we compile and create provide a choice of high quality, nutritious and well balanced food. It is our commitment, flexibility and innovative methods that make us a market leader.

3.1 Food Quality and Safety

Our primary concern is that the food we serve is prepared to the very highest standards using quality products and ingredients. Strict adherence to quality and safety standards are essential in our delivery of a truly super service, and is embedded end to end in how we operate.

Super Serv is both HACCAP and ISO 22000 certified, guaranteeing our customers food safety management systems in par with global standards.

We regularly measure compliance against these standards and implement performance objectives to assure our customers that we are providing food which is safe to eat whilst meeting their quality expectations.

All employees who work with food are expected to ensure that:

1. Food is always prepared under sanitary conditions that do not expose it to the risk of contamination;
2. They are provided with the information, training and tools necessary to do their job in a hygienic and compliant manner; and
3. They comply with all company food safety policies and procedures.

3.2 Responsible Supply Chain

As a company, Super Serv purchases goods and services from a wide variety of suppliers ranging from large local organisations to specialist local suppliers, all over the country. Where possible, we source food and ingredients from growers and producers local to our units.

3.2.1. Central Purchasing Unit

This is the logistics centre of the company. The CPU covers around 70% of the total material requirement of all operational units through company managed purchasing and delivery. When the provisions are received it goes through a vigorous sorting process. All operational units request their materiel requirement from the CPU and it is duly distributed to all units on time through its efficient delivery network.

4. INTEGRITY

4.1. Personal Integrity

4.1.1. Conflicts of Interest

Employees must take care to ensure that no conflict of interest – actual or perceived – arises between their duty as a Super Serv employee, and any interests outside of work.

Conflicts of interest can arise in many ways:

Other work interests and affiliations: undertaking employment for other companies whilst employed by Super Serv or being affiliated to other organisations can create conflicts of interest. For example:

1. Having a financial interest in another company or organisation
2. Holding a Director or consultant position
3. Performing services outside of your Super Serv role
4. Having a second job

If any of the above relate to a company or organisation that may be considered a competitor of Super Serv or a client, contractor or supplier to Super Serv, a conflict of interest may arise.

Some arrangements of this kind are never permissible. If you are considering taking on additional work outside of Super Serv that may result in a perceived or actual conflict of interest, you should disclose this to your Operations Manager or General Manager and seek their written approval to continue with your plans.

Working with close relatives: if you become aware that a close relative works for or provides services to a competitor, client, contractor or supplier, you should discuss the matter with your immediate boss.

For the purposes of the Code of Business Conduct, we consider that a “close relative” would include a spouse, partner, parent, step-parent, child, step-child, sibling, step- sibling, nephew, niece, aunt, uncle, grandparent, grandchild or in-laws.

4.1.2. Investments

Conflicts of interest may occur if investments are made in competitors, suppliers or customers. Any “substantial interest” in a competitor, supplier or customer requires the prior written approval of your Operations manager/ General manager.

For the purposes of the Code of Business Conduct, a “substantial interest” means any financial interest that might actually or be perceived to influence your judgement.

Many actual or potential conflicts of interest can be resolved in a way that is acceptable for both Super Serv and the individual. The important thing is to highlight the potential conflict so that an appropriate course of action can be agreed.

If you are concerned that you (or a colleague) may have a conflict of interest, you must disclose this to your immediate manager. Failure to disclose a conflict of interest may lead to disciplinary action.

4.1.3. Gifts and Hospitality

We appreciate that giving and receiving gifts or hospitality can help build goodwill in business relationships but they are only appropriate in limited circumstances.

In no circumstances should any employee offer, give or accept any gift or hospitality, regardless of value, which might be construed as influencing a business decision.

Consider the following points when you are faced with an opportunity to give or receive gifts or hospitality:

1. What is your intention when offering a gift or hospitality or what do you think is the intention of the business partner when offering the same to you?
2. Is the intention to build a business relationship or to influence a business decision such as the award of a tendered contract?
3. Is the nature of the gift or hospitality modest or could it make you (as the recipient) feel under an obligation to give something back?
4. Have you checked if the recipient of the gift or hospitality is allowed under their gifts policy to receive this?
5. Are you happy to justify giving or receiving the gift or hospitality? If it doesn't feel right, it probably isn't.

There are some kinds of gifts or hospitality which should never be considered as acceptable. You should not give, offer, receive or approve any;

1. Gifts or hospitality involving third parties involved in any competitive bid or tender process that you are/or may be considered to be involved in
2. Gifts or hospitality that would be illegal under Sri Lankan laws such as offering a gift to a government official which may be seen as a bribe
3. Payments of cash or paying someone else's personal bills or expenses
4. Any hospitality that might be in breach of this Code of Business Conduct or that may be considered indecent or inappropriate as part of a business relationship or which may have a negative affect on Super Serv' reputation

5. Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality

You must always seek prior approval from your immediate manager before offering or accepting any gift or hospitality.

4.2. COMMERCIAL INTEGRITY

4.2.1. Visits from Government, Public and State Owned Company Delegates

Due to the nature of our business, we sometimes receive visits from government, or state owned company delegates to our offices or sites where we operate around island-wide. Whilst it is acceptable to promote, demonstrate and explain the benefits of the services that Super Serv offers, there should be no attempt to influence any decisions by offering personal benefits.

4.2.2. Bribery and Corruption

Bribery is the giving or receiving of a gift, payment or other benefit, in order to obtain a commercial advantage. A bribe need not actually be paid – it is sufficient that it is asked for or offered. A bribe can be an issue irrespective of whether it involves private industry or government.

Bribery or corruption in any form is unacceptable and we are committed to transparency in all our business dealings.

We are committed to creating a working environment in which all our people uphold the highest standards of integrity and professionalism.

You should always abide by the following basic rules irrespective of whether you are dealing with someone in private industry or government:

1. Never offer or make any unauthorised payments
2. Never attempt to induce anyone to do something illegal or improper
3. Always report any suspicions or knowledge of improper payments being offered or received
4. Never offer or accept money (or anything of value), gifts or kickbacks, for obtaining contracts or business

4.2.3. Facilitation Payments

Facilitation payments are the payments of sums of money to a public official (or other person) as a way of ensuring that they perform their duty either more promptly, or at all.

The giving of facilitation payments by Super Serv employees is prohibited. You should not make such payments, even if they are for nominal amounts or are “normal” practice in the area in which you operate.

4.2.4. Reporting and Accounting

It is essential that Super Serv records its financial and non-financial information in an accurate and objective manner.

4.2.4.1. Financial Reporting

All books, records and accounts must conform with the Super Serv Accounting Policies and Procedures.

The following basic rules are to be considered at all times:

- All records must be accurate and complete and they should allow an accurate view of the business at any point in time
- Supporting documentation should be collected at the time of a transaction
- Accounting records and documentation should be retained in accordance with legal and fiscal requirements
- Annual financial statements and documents relating to acquisitions and other significant transactions should be kept permanently
- Fully co-operate with any internal or external audits, making sure that you provide the auditors with accurate information and allow them unrestricted access to documents and colleagues (subject always to legal constraints)

You must never:

- Falsify any record – financial or non-financial;
- Dispose or otherwise transfer any Super Serv assets without proper documentation and authorisation
- Make any false or misleading accounting entries or expense claims; or
- Destroy information to conceal bad practices.

4.2.5 Data Privacy

As a business, Super Serv holds personal data about employees, our clients, suppliers and other third parties. This information can be held in paper files as well as electronically. It is crucial that we ensure that the confidential nature of any such personal data is kept secure at all times.

Any personal data that we hold must only be used for business purposes and we must ensure that it is:

- Obtained lawfully
- Processed only for the purposes for which it was obtained
- Accurate and relevant to the purpose
- Not held for longer than is necessary
- Stored securely
- Not transferred to other countries without adequate protection

In addition to the above points, each of us has a responsibility to ensure that individuals who provide personal data to us are made aware of who will have access to that data, and for what purpose.

- Personal data should only be accessed by those authorised to do so, and only for business purposes;
- Personal data should never be provided to unauthorised persons in or outside of Super Serv without the necessary consents and contracts in place to ensure that they also treat the personal data with the same level of confidentiality;
- Always ensure that personal data is held securely with restricted access.

5. EMPLOYMENT

5.1. Health and Safety

At Super Serv, our people will make us not just a good company to work for and do business with, but a great company with a reputation for high standards and quality.

Our people are our most valuable asset. They are key to the success of the business. It's every manager's responsibility to ensure that they lead in a way that nurtures, motivates and inspires every employee.

It is our moral obligation to safeguard each other, our customers and the environment by operating an injury free, healthy workplace serving food that is always safe to eat and that minimises our environmental impacts.

Super Serv is committed to providing a safe and secure working environment to all employees and to promote best practice across all locations. We will always:

- Seek to prevent injury to any employee, customer or contractor
- Consider the safety implications of our procurement decisions
- Ensure that every employee is properly trained to safely perform their work

We believe that a commitment to safety requires a balanced approach from both management and employees.

As part of this approach, Super Serv expects that management at all levels will:

- Ensure compliance with health and safety standards
- Provide and maintain a safe working environment at all times
- Develop, promote and implement company health and safety systems and practices
- Effectively use Super Serv resources to meet our health and safety standards and objectives
- Train all employees to enable them to work in a safe and efficient manner

In addition to the above, Super Serv expects all employees to:

- Report any unsafe acts or conditions to their immediate Manager promptly
- Actively contribute ideas in order to make the workplace safer and more productive
- Never walk away from an unsafe act or hazard. If you observe someone else performing an unsafe act, you should explain to that person why it is unsafe and ask that they stop. If they refuse, it is your responsibility to report this to your immediate manager

- Not come to work under the influence of non-prescribed drugs or alcohol;
- Always wear the correct personal protective equipment;
- Make sure you know what to do if an emergency occurs at your place of work
- Follow safe work procedures at all times.

5.2. Fair treatment and Equal Employment Opportunities

Super Serv respects and values the individuality and diversity that every employee brings to the business and we seek to create a positive, open working environment wherever we operate.

In relation to our employees:

- We are committed to basing our relations with our employees on respect for the dignity of the individual and fair treatment for all
- We aim to recruit and promote employees on the basis of their suitability for the job without discrimination
- We do not tolerate any form of discrimination or sexual, physical, mental or other harassment of any kind towards our employees

To help us achieve our aims we have developed a simple framework of objectives, measures and actions that focus on the five key areas of people management and development:

- **“Attract Right”** – recruiting the right people, in the right way and reflecting the diversity of the communities that we work in;
- **“Retain and Reward”** – having the right rewards and benefits and work environment for people to want to stay with us;
- **“Develop and Engage”** – ensuring that people have the right skills to do their job and develop careers with us while connecting all our people to our goals, motivating them to achieve them and recognising their achievements
- **“Perform”** – having the processes in place to manage and continually improve individual performance.

As an employ you must:

- Treat your colleagues fairly and with dignity and respect. Discrimination of any kind will not be tolerated
- Follow all applicable labour and employment laws in Sri Lanka
- Report any instances of breaches of our commitment to equal opportunities. Do not be afraid to speak up – we all have a responsibility to address issues that we become aware of

5.3. Working without Harassment and Bullying

We expect that all employees should be treated fairly and with respect. We will not tolerate harassment or bullying of any kind in the workplace against our employees – or our suppliers, business partners or clients.

Please make sure you always abide by these basic rules:

- Do not make jokes about race, ethnicity, religion, age or sexual orientation;
- Do not distribute, display or keep on company property any material which could be considered offensive including emails, cartoons, photos etc.
- Do not spread malicious rumours or use email, voicemail or other means to transmit derogatory or discriminatory comments
- Always treat personal information as confidential. Do not misuse it
- Offensive, intimidating, insulting or malicious behaviour of any kind will not be tolerated

All forms of harassment or abuse are against company policy and will not be tolerated. If you are being bullied or harassed, or are aware that someone else is, please speak to your immediate manager or another senior member of staff.

6. COMPANY ASSETS

6.1. Brand Protection

Our reputation is a key factor in attracting clients and consumers to Super Serv and it is imperative that the value and goodwill in this reputation is appropriately protected by, taking steps to manage and protect our brand properly.

As a market leader in the foodservice sector, we often produce recipes, processes, non-public ideas and strategies that belong to Super Serv and which we must protect. The use made of a trade mark in connection with our business and services builds significant goodwill, reputation and brand value. We must also protect other confidential business information, such as customer data and personnel information and ensure that it is kept confidential.

In addition, our trade secrets, such as information related to recipes and process maps, help distinguish us from our competitors and maintain a competitive advantage in the market place.

You should consult with our senior management team or Board of Directors, if you are considering developing a new brand or technology where you wish to rely on intellectual property rights.

Always remember the following basic rules:

- Never agree to assign our intellectual property rights to clients, customers or other third parties without first consulting with our senior management team or Board of Directors
- Do not agree to share any of our intellectual property or confidential information without first making sure an approved confidentiality agreement is in place. Seek advice from our senior management team or Board of Directors
- Never use Super Serv intellectual property or confidential information for personal gain or for reasons unconnected with your role at Super Serv

6.2. Confidentiality

No employee should disclose any confidential information relating to Super Serv outside the company without specific authority to do so.

Where confidential information is to be disclosed to another party, it should be released only under the terms of a written confidentiality agreement or undertaking entered into with the other party.

If you are required to disclose confidential information under the terms of an order of any competent judicial, governmental, regulatory or supervising body, you should first notify the Board of Directors and seek their approval before making the disclosure.

Employees should not use Super Serv' confidential information for their own personal advantage or for a friend or relative.

You should also make sure that you are familiar with the company IT policy and follow its guidelines in terms of security and the use of Super Serv IT systems. Please remember that the company may monitor and record your use of the IT systems at any time and without prior notice.

6.3 Physical Assets

We all have a responsibility to ensure that Super Serv property that we use or come into contact with as part of our work is not damaged, misused or wasted. We also have a responsibility to report the abuse of Super Serv property by others.

Please also make sure that any Super Serv property that you use is well maintained so that it can be operated safely and properly.

6.4. Information Security

Misuse of either the internet or email can constitute a criminal offence. Each of us has a responsibility to ensure we understand the legal restrictions that apply in the location where we are working, and make sure we adhere to them. Please speak to your local legal team for further guidance on legal restrictions that may apply in the country where you work.

Please make sure you always follow these basic rules:

- do not install or use any unauthorised hardware or software on any Super Serv system
- protect any username or password that you are allocated and do not share them with others
- do not access or download, create or forward emails, documents or images that may cause offence, distress or harassment to others
- restrict your use of Super Serv systems for personal use to a minimum
- make sure you save and back up regularly any data or work that you hold on your system in accordance with the advice from your IT personnel.

7. ENVIRONMENT

The environment is not a sector, but an attitude and approach which represents a necessary part of all of our activities. In short, it is important that employees display environmental responsibility in all areas within their control, regardless of their position.

As one of the largest food service companies in the world, Super Serv recognises that it has an impact on the local environments in which it operates and the global environment in general.

In addition to complying with all relevant environmental legislation, Super Serv has developed its own common set of behaviours that are being introduced into all our operations. We continue to drive improvement across our business, particularly in the areas of supply chain and environmental performance.

In the majority of our locations where we are not directly responsible for the procurement of utilities, equipment, fuel etc., we work closely with our clients to consider how best to improve the environmental performance of our operations.

Basic rules you must follow:

- All employees must comply with company rules and procedures in relation to environmental matters
- Ensure that you are equipped with the right information, training and tools necessary to implement responsible environmental practice
- Make sure you prevent or minimise any release of pollutants into the environment as a result of your work activities
- Make sure you properly dispose of all waste materials and have due regard to good waste management practice
- You should be aware of the best environmental option for the disposal of particular waste materials in your workplace. Any employee found to have disposed of waste material in an appropriate or illegal manner may be subject to disciplinary action
- All employees should consider energy efficiency in all aspects of their work and take steps to save energy wherever practicable
- All employees should use recycled materials in their work activities wherever available and should recycle any appropriate items as and when possible
- All employees should ensure that they do not carry out activities that waste water