



OUR CODE OF
BUSINESS CONDUCT

dunnhumby

C O N T E N T S

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A portrait of Guillaume Bacuvier, Chief Executive, wearing glasses, a light blue shirt, and a dark blazer, with his arms crossed. The background is a blurred office setting.

A message from Guillaume Bacuvier

Our Code of Business Conduct ('Code') is at the heart of how we run our business, and is designed to help and protect us. It is important that we all understand the rules that we must follow, and the conduct that is expected of us, to look after our colleagues, do a great job for clients and stakeholders, and to protect our reputation.

Whether you are new to dunnhumby or have worked for our business for years, please take the time to understand our Code and how it applies to you. Our Code means more than just following the law and our policies. It's about using our Values & Behaviours, guiding our conduct and decision-making so that we are always doing the right thing for each other and the business.

If you ever have concerns about your own conduct or that of another person, you must speak up straight away and talk to someone you trust, starting with your line manager. Alternatively, speak to the HR or Legal team. If you need to raise your concern anonymously, you can do so through Speak Up, and in complete confidence.

We should all be proud of our business and the contribution that we make. By living our Code we can build an even stronger business for the future.

Guillaume Bacuvier
Chief Executive



Living the Code

We expect all colleagues to:

- Know the Code and how to access it
- Follow the guidance and advice contained in the Code
- Complete all Safe, Legal, and Secure training on an annual basis, and any other training as required, so that you are confident in how to handle complex issues
- Ask for help if you're not sure what to do
- Always consider "how" you do something as much as "what" you do
- Speak up if you ever think that the Code has been broken or our Values have been undermined

If you manage other people, we expect you to:

- Protect team members by ensuring that they have the skills and training they need in their roles including Safe, Legal, and Secure training
- Manage risk effectively and never take, or require others to take unnecessary risks, including those that may be illegal, unethical, or cause harm or injury to any of our stakeholders or our brand
- Provide visible and consistent leadership on Code issues
- Reward Values-led behaviour and nurture a culture of inclusion, respect and integrity within your teams
- Do not allow unethical conduct to pass unchallenged and take action if you identify wrongdoing or it is brought to your attention by others



Code guidance

Our Code is underpinned by two simple principles:

1. We always comply with the law

Trust in our brand depends on our reputation as a law-abiding business and the Code and policies set out how the law is applied in practice. Where local laws or policies are stricter than the Code, the local rules prevail.

2. We are always guided by our Values & Behaviours

Our Values help us do the right thing when faced with difficult decisions. They are supported through a set of repeatable behaviours we live and breathe to be a high-performing business.

Curiosity – Listen. Ask questions. Explore.

Be an active listener, ask the right questions to understand our clients and to explore, look for opportunities to improve what we do and how we do things to achieve our strategy.

Courage – Be ambitious and decisive

Understand our strategy and prioritise what you can do to deliver it. Be bold to do things differently, identify quickly if things don't work and learn from them. Constructively challenge each other and our clients in a data-led way.

Collaboration – Together, we grow one dunnhumby

Share your knowledge and best practice. Understand the goals other teams are working towards and see how you can connect your work. Actively resolve issues and celebrate our collective success. Be trustworthy and respectful of people and processes. Constructively voice your opinions, understand decisions made and follow them.

Passion – It all starts with the Customer

Bring our purpose to redefine Customer First to life in your work. Care about our clients and deliver exceptional work to them. Take pride in what we do and encourage one another to be the best we can be.

The following pages provide you with advice and help in dealing with the main risks you may face in your work. Each section includes a Q&A, a list of relevant policies, and which teams to contact for help.

Accurate accounting and money laundering

To meet our legal obligations and to retain the trust of our clients and shareholders, all our financial information must be accurately reported in the dunnhumby Group accounts. Income and cost data must always be recorded correctly and at the right time.

We are committed to complying with local and international financial reporting rules and other internal reporting policies. We must all ensure that we are honest, and act with integrity in recording financial and non-financial information.

We are committed to complying with anti-money laundering laws and regulations. We will not knowingly accept any object, including payment, that is the proceed of an unlawful act as governed by applicable anti-money laundering laws.

What does it mean for me?

- If you are involved in recording income or costs, ensure you are aware of internal financial policies and how they apply to your role.
- Only submit financial information that is accurate and relates to the correct financial reporting period.
- Maintain accurate records, and accounts to support all financial information.
- Work closely with your local finance team and seek guidance if you are unsure how to record income or expenditure.
- Be aware of, and follow, our travel and expense policy and ensure that members of your team do the same.
- Co-operate with our internal and external auditors by providing them with the information and documents that they may require.
- Be alert to the risks around unexpected changes to supplier arrangements, for example, the supplier is moving their bank account to a known tax haven as this could be a red flag.
- Speak Up if you have reason to believe that inaccurate or falsified records are being kept by other employees, they are misappropriating funds, or if you have any other related concerns.

FAQ

Q: I have almost agreed a client project. Can I account for the income in an earlier period since the work will definitely take place?

A: No. According to normal accounting practice, income must be recorded in the financial period in which the activity takes place.

Q: A potential supplier is refusing to disclose the identity of its owners because they claim this is confidential information. All the background checks shows that they are owned by an entity in an off-shore jurisdiction. What do I do?

A: This is a red flag and you must seek advice and guidance from Legal. Complex ownership structures that conceal the identity of the ultimate owners of a company are a way of disguising the source of funds and can be used to enable money laundering.

Q: I am covering for my colleague who is on annual leave, and I've noticed that the figures I have recorded are much lower than normal. Is this a problem?

A: There are lots of reasons why the figures may be different. If you are in any way concerned that data is not being recorded in line with our policies and processes, talk to your line manager or follow the Speak Up process.

Where can I find out more?

The Finance team

Charitable donations

We have a history of supporting local and national charities, providing money, time, products and services that make a real difference to our communities. When offering our support, it's important we check that the organisations we support are appropriate, legitimate and are helping our communities in the way we would expect. This helps us to make sure that any donations we make do not cause harm to our reputation and protects all employees from legal or financial challenges.

What does it mean for me?

- Support our established charity partners.
- Carry out the necessary due diligence checks through the Procurement process, on any charity we are planning to support if the charity is not an established partner.
- Only make charitable donations with the appropriate authority and approval. Any donation (including to charities other than company nominated charity partners) of more than £500 requires pre-approval by a member of the executive team.
- Never pressure a stakeholder to make donations (money, goods or services) to charities we support.
- Never allow dunnhumby funds to be given to charities that may harm our reputation.

FAQ

Q: Ten of us have been invited to a charity golf day by a charity who is not a dunnhumby charity partner. We are donating money to the charity to take part. Is this permitted?

A: Yes, however you will need approval from the Executive team as the money is being donated to a charity that is not a dunnhumby charity partner. You should ensure that relevant due diligence checks are completed. You must also report this donation to your local Helping Hands committee as they maintain a log of charitable donations.

Q: A supplier has invited me to a charity awards dinner. Can I accept?

A: This situation is covered by our Global Gifts and Entertainment policy. You will need to find out the total value of the entertainment, get manager approval if the value is more than £100 (or local threshold) and log it on the Gift register.

Where can I find out more?

[Your local Helping Hands Committee](#)

[The Legal team](#)

[Global Gifts and Entertainment Policy](#)

[Procurement process on iSite](#)

Competition laws

We are committed to fair competition. Growing our business in competitive markets, and helping our clients to do the same, is the lifeblood of our business. We do not sign agreements (formal or informal) that lead to illegal restriction or distortion of competition.

Competition laws exist in most countries where we operate to protect competition. There are significant penalties for companies and individuals breaking the law, and investigations can also be disruptive and damage the trust our clients place in us.

What does it mean for me?

- When dealing with competitors, we do not exchange information about current or future purchase or selling prices of our services and products. We do not discuss margins, sales practices, geographical markets, market shares, certain customers, or sources of supply.
- When dealing with clients – and particularly agencies – we do not expect them to resell our services at specified prices. We do not take any action to unfairly favour a client against another client who competes with them.
- Do not ask for, receive, or share confidential or commercially sensitive information with competitors or clients. Use information available in the public domain to help make decisions.
- Ensure that you attend training on competition law where applicable to your role.
- If you receive confidential information, or have any other contact with competitors, clients or other stakeholders that raises concerns, you must contact the Legal team. It is not enough to simply ignore the information, even if you have not actively participated or have received the information in error.
- Take care when referring to our business, clients, or competitors in documents. All external and internal documentation, including emails, board papers, research reports, and text messages can be viewed by regulators during an investigation.

FAQ

Q: Can I ask my client a question about one of our competitor's future prices?

A: No, we should not have advance warning of a competitor's future prices. If a competitor or client gives you such information, you must inform the Legal team as soon as possible.

Q: I have received commercially sensitive information about a competitor from a friend. Can I ignore it?

A: No, ignoring such information, even if received in an informal context, is not enough. Inform the Legal team to ensure that such information is visibly disregarded, and an audit trail is available to demonstrate.

Q: Can I invite more than one client to a meeting?

A: From time to time, it may be sensible to invite clients to a joint meeting, for example, to brief them on key changes to our business or to discuss a best practice issue. However, remember these meetings can be sensitive because they often involve clients who are each other's closest competitors. The Legal team will be able to provide more guidelines to help ensure that no inappropriate activity takes place.

Q: I have been asked to attend a trade association meeting. Can I participate?

A: Yes, these meetings are not in themselves problematic, and may be pro-competitive. However, the normal competition rules apply: make sure you do not discuss, disclose, or exchange commercially sensitive information with a competitor.

Where can I find out more?

[Legal team](#)

[Competition Policy](#)

Conflicts of interest

A conflict of interest happens when a personal interest is allowed to interfere with, or influence, our ability to make decisions for the good of the business or our clients and other stakeholders.

We should make sure that our private interests and motivations do not conflict with the interest of the business.

We should not do business on behalf of dunnhumby from which we, or a family member or close friend, might benefit unfairly. We don't compete with dunnhumby business.

Conflicts may harm our reputation, and in the worst cases, may result in fraud, discrimination or other serious issues. To protect against this, there are safeguards in place that we must all follow. Directors of any of our group of companies have additional statutory duties in relation to conflicts of interests and will be informed of these.

What does it mean for me?

Whenever a conflict of interest arises, or you think it might arise, take steps to:

- **Identify:** be aware of any personal interests that may influence your decision-making on behalf of the business. For example, a partner or family member is a supplier, or when introducing a supplier to dunnhumby, known through prior or existing personal or professional relationship.
- **Avoid:** remove yourself from all situations where the appearance of a conflict might exist and ask yourself how an outsider would view it i.e. it's best not to work in the same team as a family member, or remove yourself from decision making when shares are owned in a business we're working with.
- **Mitigate:** if you can't avoid the situation, discuss it with your line manager and agree a plan to manage the conflict.

Also, complete annual declarations on any conflicts or potential conflicts, if required for your grade or role.

FAQ

Q: We are looking for a new service provider and my wife runs a company that could do the job. Can I share the details of the tender with her?

A: No. The details of the tender are confidential. You should never use your position at dunnhumby to give a commercial advantage to a partner, friend or relative. If your wife's company is going to bid for the business, you must disclose your relationship to your line manager and the Legal team and you should not be involved in the tendering process.

Q: My team is recruiting for a position that I think my niece would be well suited for. Is it alright if I pass along her details and recommend her for the role?

A: Yes, if your niece has the knowledge, skills and character for the role, then you may recommend her as long as you are not in a place to directly determine or influence the decision to employ her. Always declare your relationships as soon as possible to avoid any appearance of a conflict.

Q: I need to travel for work on an upcoming trip and would prefer to book a ticket with the airline I get loyalty points for. Can I use my airline even if they are more expensive than others?

A: No, business travel is booked by dunnhumby's travel team and you should never allow your personal interests to influence your decisions for the business. If a cheaper flight is available and being offered then you must choose this option.

Q: I think that my manager has set up his partner as one of his suppliers and is giving work to them, even though they are more expensive than the other suppliers, and the products are worse quality. What should I do?

A: This is not only a conflict of interest, but it may also be a fraud against dunnhumby. Please Speak Up!

Where can I find out more?

[The Legal team](#)

[The HR team](#)

[Conflict of Interest Policy](#)

Equal opportunity, inclusion, and diversity

We strive to create a globally diverse and inclusive culture where everyone is welcome, and where our business reflects the diverse nature of society. We make employment decisions on the basis of job-related skills, achievements, and performance using clearly defined and fair criteria. We do not accept any discriminatory practices or behaviours that could make employees feel unwelcome or excluded.

We must treat everyone fairly, equally, and without discrimination, irrespective of age, sex, disability, sexual orientation, pregnancy, gender reassignment, race, caste, religion, political belief, or other protected status.

Where appropriate we offer opportunities to employees to work in a way that suits their circumstances to help everyone achieve the work/life balance that is right for them. This includes part-time roles, flexible working, and job-sharing opportunities.

Our intention is to create an environment of equality, respect and inclusion where you feel your contribution is valued, and you are encouraged to fulfil your potential.

What does it mean for me?

- Act with integrity and in good faith to support your colleagues and the wider business.
- Respect everyone you work alongside regardless of any social or cultural differences.
- Be mindful of discrimination when recruiting new colleagues and promoting or developing existing colleagues, based on merit and business considerations alone.
- Model inclusive behaviour in your team to ensure an environment of openness and collaboration where we can draw from the diversity, knowledge, and experience of our colleagues.
- Voice your views and concerns through the right channels so that we can all work together to make dunnhumby a great place to work.

FAQ

Q: I need to make a promotion decision between two colleagues. One colleague is 55 and the other is 40. Should I promote the younger colleague since they may work for us for more years?

A: No. We only make employment decisions based on job-related skills, achievements and performance. We never make decisions based on age or any other non-job-related characteristics.

Q: A colleague is recruiting a new team member. They have made a number of remarks that I am concerned may mean they could discriminate against certain candidates. What should I do?

A: You should always raise your concern in the manner you feel most comfortable with, because we will not tolerate any form of discrimination. If you don't feel you can speak to your colleague directly, speak with your line manager, the HR team or use the Speak Up process.

Q: An interview candidate, who has a disability, has requested that their interview is held near the accessible facilities. Should I make the adjustment?

A: Yes. Candidates who have disabilities should be supported with reasonable adjustments, as far as is reasonably practical, to ensure they aren't disadvantaged.

Q: My manager hasn't been putting forward colleagues for training opportunities. I think this might be because they are pregnant, is that OK?

A: No. There should be fair access to training opportunities for all colleagues. If you have a concern and feel you can't raise this with your manager directly, you should talk to another manager, the HR team, or use the Speak Up process.

Where can I find out more?

The HR team

Ethical trading

We contribute positively not only to our industry, but also to the wider society and the environment.

We fully support the UN's Declaration of Human Rights and the Core Conventions of the International Labour Organisation. Any breach of a person's human rights is wrong.

We support community organisations and employee development. We maintain the highest standard of marketing ethics, consider the potential impact our work may have on other people, and will not undertake work that is intended or designed to mislead, discredit, or harass.

We should only work with clients and suppliers who share similar values and respect local labour and environmental laws.

What does it mean for me?

- Choose clients and suppliers based on their values as well as prices and quality, and build strong, trusted partnerships.
- Follow our due diligence processes when appointing a new supplier as this may help to flag possible concerns which can then be addressed.
- Make sure our clients and suppliers are aware of our commitment to human rights, the environment, and trading responsibly, and that they are committed to making improvements if appropriate.
- Where problems are identified, work with the stakeholder to deliver a clear improvement plan.

FAQ

Q: My client has been found to be paying their workers below the legal minimum wage. What should I do?

A: We always seek to remedy any concern we identify. Please contact the Legal team.

Q: What do we do if a breach of rights is found in our workplaces or supply chain?

A: We always seek to remedy any concern we identify. If the issue involves dunnhumby colleagues, contact your local HR team. If the issue is in our supply chain, contact the Procurement or Legal teams.

Where can I find out more?

[The Legal team](#)

[The Procurement team](#)

[The HR team](#)

External communications and using social media

We champion the many advantages and opportunities that the internet presents for our business. Using social networks and online communities offers great benefits to us as individuals and as a business to communicate what we are doing, whether to colleagues, clients, or other stakeholders.

If incorrect or confidential information becomes public by whatever means, it can damage our reputation, our competitiveness and the trust placed in us by our clients. Misinformation can also put the dunnhumby brand and colleagues at risk of legal action.

What does it mean for me?

- Live the Values of our business and be authentic. Identify yourself as a dunnhumby employee and state that 'All views are my own' in your profile. Don't use an alias or mislead people about your connection to the company.
- Remember that everything you post on the internet is public and be mindful that media and competitors are watching.
- Be responsible with the content you share. Try to ensure your posts are accurate, not misleading or damaging and be careful not to reveal confidential company information.
- Respect copyright and give credit where it is due. Don't post text, images or videos that were created by someone else without their approval or crediting them.

FAQ

Q: I made a funny video of myself messing around in the office. Is it OK for me to post it to a website like YouTube?

A: Unless the video has been authorised by the dunnhumby Internal Comms team, this wouldn't be appropriate to share either internally or externally.

Q: I see lots of interesting LinkedIn articles, tweets, and Facebook posts about dunnhumby. Can I post these online externally or send them to friends and family?

A: Yes, but make sure the information comes from a reliable or known source to avoid 'fake news'. Only share information that is intended for the general public, and remember the golden rule: post positively.

Q: Can I post or share news or announcements that were published on the dunnhumby intranet?

A: Most of the information published on our intranet is intended for internal use only. If the information you are interested in has already been shared on the official dunnhumby external social channels like LinkedIn, Twitter, and Facebook, or on www.dunnhumby.com, you are allowed to re-post or re-share externally.

Where can I find out more?

Internal Communications team

Marketing team

[Social Media Policy](#)

Fraud

Fraud is a serious crime that harms our business and can have a significant impact on our assets, profits, costs, and reputation. The term fraud is commonly used to describe theft through a variety of dishonest behaviours such as deception, forgery, lying, and concealment of material facts. Tax evasion is another type of fraud; dunnhumby can be prosecuted and face unlimited fines if we or others we work with are found to have knowingly facilitated tax evasion.

We all have a responsibility to protect our business from fraudulent activity – whoever commits it. dunnhumby will make every effort to minimise the impact of fraud on the business by identifying fraud risk and mitigating it through the implementation of proportionate and appropriate financial and non-financial controls.

We trust our employees to act honestly at all times, and we will always investigate and take action when fraud is committed against our business by employees, contractors or those that work on behalf of dunnhumby.

What does it mean for me?

- Remain alert to the possibility of fraud. If you suspect that theft or other fraudulent activity is taking place, have noticed inconsistency with invoices, or any other potential control weakness, please report this to your line manager or use the Speak Up process.
- Always make sure that due diligence has been conducted for new suppliers before you work with them. Please contact Procurement if you have any questions as we should not work with companies that have a reputation for fraudulent activity.
- Always follow our travel and expenses policies.

FAQ

Q: A colleague was travelling for work recently and took some friends out for dinner and submitted the meal for reimbursement as an expense. She says this is fine as she often forgets to submit other expenses so ultimately everything “balances out” and I should do the same. Is this acceptable?

A: No. By submitting these expenses, she is committing fraud. Personal expenses should reflect what charges you have incurred while working.

Q: A colleague has been submitting invoices from a supplier where the amounts do not match the supporting documents. He claims the difference was agreed in a different contract, that they are ‘always done this way’ and that I can amend the documents so they match. What should I do?

A: You should refuse to amend the documents and ask your colleague to obtain correct ones. Inconsistent invoices and documents are a ‘red flag’ for fraud or fraudulent activity. We reduce risks by keeping accurate records and invoices. If you are still unsure what to do raise your concern with your line manager.

Q: I’ve been approached by a new supplier offering me products at a really good price. I don’t know much about their company, how should I proceed?

A: All new suppliers need to go through our due diligence process. Prices that sound too good to be true often are, and may only be possible because the supplier doesn’t account for and pay VAT or Duty for their products correctly. If we can’t show we have carried out proper checks, the authorities can require dunnhumby to pay the uncollected taxes, potential interest, and penalties. Plus, we could face criminal prosecution.

Where can I find out more?

[Procurement team](#)

[Travel and Expense Policy](#)

[New Supplier set-up process](#)

[Local Finance teams for tax questions](#)

Gifts, entertainment, and improper payments

The giving and receiving of modest gifts or entertainment is an important part of building relationships with suppliers and other parties. This should never influence – or appear to influence – our business decisions in any way. We will never seek or apply any influence in exchange for promises, gifts or any other inducements, no matter what the local business practice may be in the countries where we operate.

Any gift or entertainment given or received must be appropriate, be approved in accordance with our Global Gifts and Entertainment Policy and must be recorded in the gifts register where required.

What does it mean for me?

- Follow the Global Gifts and Entertainment Policy, which provides guidance on what constitutes a gift or entertainment, the acceptable monetary values for different countries, and information on the approval and recording process.
- Before you accept or offer a gift or entertainment worth more than £100, or £50 in specified markets, seek approval from your line manager and follow the recording process. Please see the Policy for detail on specified markets.
- Never accept or give a gift of cash or cash equivalent like gift cards or vouchers.
- The receipt of expensive gifts or entertainment is generally not appropriate unless you have a clear business justification.
- You should never accept any gift or entertainment that might influence your decisions on behalf of the business or be construed as a bribe.
- Never give or accept inappropriate gifts and entertainment, including those that are indecent, pornographic, or otherwise offensive.
- Always take care and consult the Legal team before giving any gifts to public officials.
- Entertainment that requires foreign travel must be approved by a member of the Executive team before it can be accepted.

FAQ

Q: I won a raffle held by my supplier last week. My prize was a new camera. May I accept the prize?

A: The prize is deemed a gift, and assuming the value is over £100 (or £50 in specified markets), you will need the approval of your line manager to accept the gift. Ensure it is recorded on the gifts register by completing a Gifts and Entertainment Form and emailing: giftsandents@dunnhumby.com

Q: A supplier has offered me gift vouchers worth £250 if I ensure that we book them for an event. May I accept the gift?

A: No. The gift is a cash equivalent and the policy does not permit the receipt of cash or cash-equivalent gifts. More importantly, it is inappropriate to accept any gift in these circumstances, even if they are from a preferred supplier.

Q: I have been offered a hospitality ticket for Wimbledon. The face value of the ticket is £450 but the supplier has said the total cost of the hospitality package is £1,500. Which figure do I use when I register this through the proper process?

A: You should use the total cost to the supplier which is £1,500. If the supplier paid for any additional items such as travel or overnight accommodation, the cost of these should be added to the total amount to be recorded.

Q: A client invited my team out to a charity dinner last week and the cost was £30 per person. Do we need to log the dinner on the Gift Register?

A: Yes. If the cost per person is below the approval/reporting threshold, but the total cost of the evening is above the threshold, each colleague must still seek approval from their line manager before accepting the invitation, and ensure it is logged on the gifts register.

Q: A supplier I have worked with before is participating in a tender process for new business. They would like to take me out one night to dinner to discuss the potential contract. Can I accept their offer?

A: No. Our Policy prohibits all colleagues from accepting or offering any gifts or entertainment during a tendering process. This ensures our decisions are made without any personal influences impacting the outcome.

Where can I find out more?

[The Legal Team](#)

[Travel and Expense Policy](#)

[Global Anti-Bribery Policy](#)

[Global Gifts and Entertainment Policy](#)

giftsandents@dunnhumby.com

Health and safety

We are all responsible for making dunnhumby a safe place to work, and to ensure everyone is able to do their job in a safe working environment.

By working safely, effectively managing our risks, and creating a culture of care, we can prevent the distress and impact caused by injuries to all our employees and stakeholders. We can also minimise the disruption to our business caused by absence from work, accident investigation, medical treatment, compensation, and legal action.

We are committed to ensuring that everyone feels their safety is taken seriously. Our promise is to always be legally compliant, understand the causes of accidents so we can prevent them from reoccurring, and always seek to reduce any risk of harm to anyone impacted by our activities.

What does it mean for me?

- Follow safety instructions, Health and Safety policies, and procedures that apply to each role.
- Ensure risks are understood, and have proper plans to minimise potential harm from them.
- Set an example of safety, and encourage others to do the right thing.
- Safety is everyone's responsibility. If you think something is unsafe or could cause an accident, take action to deal with it, if safe to do so, and report it immediately to your line manager.
- Never agree to do anything if you don't have the appropriate knowledge or training to do it safely.

FAQ

Q: I have just joined dunnhumby. Colleagues have told me that health, safety and security training takes a while to complete, and is just "common sense". Do I really need to do the training?

A: Yes. All new starters must be familiar with safety precautions necessary in their workplace and know what to do in an emergency. Not all workplaces are the same, and we all have different levels of experience. Our safety training makes sure that we all work together to stay safe.

Q: I had an accident at work. What should I do?

A: All accidents at work must be reported immediately to your line manager so they can provide support and follow local injury reporting requirements. Reporting accidents helps us to better understand the risks our employees face so we can create a safer place to work.

Q: Who looks after the health, safety and physical security at my office?

A: We have a team who work across all offices, and who can deal with technical questions, manage the process of risk assessment, or find local representatives. These colleagues all possess safety qualifications and considerable experience that together make them competent in their own field. Their details should be listed on the health and safety notice board, or you can contact globalhealthandsafety@dunnhumby.com for all things relating to health, safety and physical security.

Where can I find out more?

[Health and Safety Policy](#)

globalhealthandsafety@dunnhumby.com

Insider dealing and market abuse

As part of your role, you may become aware of material 'inside information' about dunnhumby, the Tesco Group, or other companies we do business with. This includes information that has not been made public for our own benefit, or for the benefit of others we know.

It is against the law and against company policy to use inside information for your own benefit, or on behalf of others. This includes selling or buying shares or other securities such as listed bonds on the basis of inside information, which is known as "insider dealing", and is a serious criminal offence. It is also an offence to share inside information with any other person if they might use it to make a trading decision.

We all have a responsibility to ensure that we know and abide by both the law and our internal policy. These rules apply even after employment at dunnhumby.

What does it mean for me?

- Where your role requires access to material, non-public, price-sensitive information, you will be added to an Insider List, managed by the Legal team. You will not be able to deal in the applicable company's shares until removed from the list.
- Do not pass on material, non-public, or price-sensitive information to other people, or encourage others to deal in our clients' shares or securities on the basis of such information, even if you do not deal yourself or otherwise profit from passing on the information.
- Do not engage in market abuse by spreading false information or engaging in other activities designed to manipulate the price of a company's securities.

FAQ

Q: What is "inside information"?

A: Inside information is information about a company that is not in the public domain and that a reasonable investor would consider important when deciding whether to buy, sell, or hold shares or other securities. As our parent company, Tesco, and some of our clients are listed public companies this is relevant to us.

Q: I hear that dunnhumby is about to award a big contract to a publicly traded supplier company. Can I buy shares in the supplier before the contract is signed and made public?

A: No. Buying or selling shares in a company on the basis of inside information is considered insider dealing and is illegal.

Q: Can I encourage a friend to buy shares in the supplier company instead?

A: No. This is known as "tipping". You are not allowed to pass inside information to anyone else or encourage others to deal on the basis of such information, even if you will not profit from it.

Q: My friend is thinking about selling some Tesco shares. I know that Tesco is due to make an announcement about dunnhumby that will cause the share price to increase. Can I tell my friend to wait to sell?

A: No. You must never disclose information about Tesco and/or about dunnhumby that is not publicly available, and you must never use inside information to inform the investment decision of others.

Where can I find out more?

[The Legal team](#)

Intellectual property

At dunnhumby we pride ourselves on innovation and on using data science to create world class products and services – these give us a competitive edge in an increasingly crowded marketplace.

We must always take care to protect our intellectual property, from patents, designs and copyright, to trademarks and trade secrets. Protecting what is ours helps us to ensure that it isn't copied or sold by others without our agreement.

We respect the intellectual property rights of others. Stealing an idea reflects badly on a business, damages customer trust, and may result in legal action being taken.

What does it mean for me?

- Consult with the Legal team before allowing third parties to use our brand, tools, software code, algorithms, or other intellectual property.
- When you're developing new products or services, keep them confidential, and speak with the Legal team about how to protect them.
- Always create or source original ideas or products for our clients.
- Follow the dunnhumby Brand Design Guidelines, and speak to the Marketing and Legal teams if you have any doubts about a proposed product name, design, or innovation.
- Promptly report any known or suspected theft or unauthorised use of dunnhumby intellectual property rights.

FAQ

Q: I'm designing a new dunnhumby product. How do I ensure I'm not infringing anyone else's IP?

A: Know your market and what products and designs are already out there. You are free to take some inspiration from existing ideas, but don't copy another product. The Legal team can advise you on whether your new product is OK to use.

Q: I'm developing some new technology that could really help dunnhumby's business. What steps should I take?

A: Consider whether there is already any similar technology on the market. Keep your idea confidential and contact the Legal team as early as possible so they can help protect your new idea or invention. You should always put in place an agreement with the third party that sets out who will own any IP in the new technology. The Legal team can advise if the new technology can be protected by a patent or any other form of intellectual property rights.

Where can I find out more?

[The Legal team](#)

[The Marketing team](#)

[Intellectual Property Policy](#)

[Brand Design Guidelines](#)

Political activity

As part of doing business, we may occasionally engage with governments, regulators, public interest groups, industry associations, and other similar bodies on issues that are vital to business. We always ensure that we comply with all laws governing political engagement. As a business, we are politically neutral. We have no political affiliations and we do not make political donations to parties or candidates.

All employees have the right, like any other citizen, to be politically active, as long as this is kept separate from our work duties, and doesn't influence how we behave with clients, colleagues, or anyone else.

What does it mean for me?

- Consult the Legal team if you receive any correspondence or requests for information from government departments, politicians, or political action groups.
- Consult the Legal team if you receive any requests for political donations, including the sponsorship of events organised by politicians or political parties.
- Take care with the giving of gifts and entertainment to any public officials, and ensure you have read the Global Gifts and Entertainment Policy.
- You are of course free to become involved in the democratic process – a community gets stronger when people are engaged in making it a better place. But always be clear you are acting on your own behalf and not for dunnhumby.
- Any personal political activity must take place in your own time and not affect your work.
- Your point of view must not influence how you behave towards your colleagues, clients, or anyone else.

FAQ

Q: Can I make a political donation on behalf of dunnhumby?

A: No. We do not make donations to political parties or candidates.

Q: Can dunnhumby sponsor a political event that is charitable?

A: You should discuss such requests with your line manager and the Legal team. You will need to ensure that the sponsorship of the event does not give rise to bribery or other reputational concerns and is not partisan. Remember that dunnhumby is a politically neutral organisation.

Q: Can I take time off work to help a local candidate campaign for a seat in Parliament?

A: You should discuss this request with your HR team who will explain the process for taking unpaid leave from work. Whatever the outcome, you must ensure that your political beliefs do not interfere with your work for dunnhumby.

Where can I find out more?

[The Legal team](#)

[The HR team](#)

[Global Gifts and Entertainment Policy](#)

[Charitable Donations – speak to the Legal team](#)

Prevention of bribery and corruption

As a business, we have a zero-tolerance approach to bribery and corruption. We are committed to maintaining the highest standards of integrity and have a responsibility to protect the business from such acts by acting fairly and ethically wherever we operate.

Bribery and corruption are illegal in all the countries in which we operate. It damages markets and communities and transfers resources into the wrong hands.

We expect everyone who works with us to adopt the same zero-tolerance approach. The UK has some of the strictest bribery laws in the world, and they apply to everyone who works for us anywhere in the world, including contractors and agents. UK citizens may also be prosecuted no matter where the offence was committed, and this principle will apply in all other jurisdictions in which we operate.

What does it mean for me?

- Never offer bribes, payments, gifts such as cash, or other benefits to win contracts or persuade someone to act in your favour.
- Never seek or accept bribes, such as gifts or entertainment, to give or receive business to or from a new or existing client or supplier.
- Know and understand the third parties we engage with by conducting due diligence on them as part of the appointment of a new supplier, investment in a new business, or partnering to work with a new company.
- Be mindful of the bribery risks posed by engaging with public officials, and ensure our engagements are always open, honest, and transparent.
- Use legitimate fast-track processes to expedite routine decisions, but never make payments directly to public officials to secure a permit or licence.
- Ensure you complete our anti-bribery and corruption training as part of our Safe, Legal and Secure e-learning programme.
- Be alert to the possibility that bribery and corruption can occur and regularly review our policies and guidance on iSite.
- Cooperate fully with law enforcement agencies and investigators, and support prosecution or disciplinary action where sufficient evidence exists.

FAQ

Q: A colleague has said the meals and travel expenses a supplier has been paying for are part of his "special relationship" with them. I am not sure, but it sounds suspicious. What should I do?

A: It could be a breach of our Global Gifts and Entertainment Policy to solicit entertainment or other benefits in return for buying goods or services from a supplier. You should speak to your line manager, the Legal team or use the Speak Up process. Even if you are not sure, being part of a culture where we are able to speak up when we are uncomfortable or unclear about the things that do not feel right is important. Your concerns will be investigated and taken seriously.

Q: In my country, it is not illegal to pay the local official a small amount of cash to get my paperwork stamped. Is this a problem?

A: Yes. This is actually a small bribe also known as a 'facilitation payment' and is illegal under UK law which applies even if you are working for dunnhumby in another country. Like all bribes, facilitation payments must be refused and reported.

Q: I often engage with consultants who obtain permits I need for our business. A consultant has offered to reduce the admin and waiting time by half but isn't clear how they will do this. Should I be concerned how they do it if they can deliver what I need?

A: Yes. The actions of those who act on our behalf pose significant risks of bribery for us. It is important we are clear on exactly what they are doing, and how they are acting on our behalf. Our reputation is too important to risk being damaged by an act of bribery, and we can be liable even if we were unaware of it. Speak to the Legal team and make sure appropriate due diligence on all third parties before they act on behalf of dunnhumby.

Where can I find out more?

[The Legal team](#)

[Procurement on iSite](#)

[Global Anti-Bribery Policy](#)

[Global Gifts and Entertainment](#)

[Conflicts of Interest Policy](#)

Protecting data

Data is at the heart of our business, enabling us to put our clients first. We collect, process, use and analyse information ranging from client data to employee contact details.

We have an important duty to protect the information we receive and hold about our business, our clients, our clients' customers, and our employees. We treat data responsibly, lawfully, and in line with our Global Privacy Policy and other related policies and guidance.

The trust of our people, our clients, and our clients' customers is very important, so we take our obligations under relevant data protection and privacy laws very seriously. We should also regard all information concerning our business as an asset, which, like other important assets, has a value and needs to be suitably protected.

We only use data for the purpose it was collected, and nothing else. We are open, honest, and transparent about what data we hold, why we use it and provide choices on how we use data.

We have policies and procedures in place, and understand why we are using the data and how long we can keep it for.

What does it mean for me?

- Most of the information that we hold is confidential to dunnhumby, to our clients, or both. If you believe that any type of data might have been misused, lost, or be the subject of unauthorised disclosure, you should immediately report it to your line manager, Global Security or Legal teams, or use the Speak Up process.
- Ensure you remain up-to-date with the latest Global Privacy Policy, Security Policies, and other relevant policies and procedures available on iSite.
- Consider "privacy rights" when developing a product or service. If you have any concerns.
- Contact the Legal team if you have any concerns.
- Be clear with clients, colleagues, and other stakeholders on what data we hold, and what we do with it.
- Only share data with people who 'need to know' it for a legitimate business purpose.
- Remember that your confidentiality obligations apply during the course of your employment, notice period, and after leaving dunnhumby.
- Do not release information without making sure that you are authorised to do so, and that the person you are providing it to is rightfully allowed to receive it. Where necessary, ensure that the information has been encrypted in accordance with Information Security Policies before sending it externally.

FAQ

Q: What triggers a privacy issue?

A: Privacy is triggered where we handle any data relating to identified or identifiable people. See our Global Privacy Policy for further information.

Q: Where might I face a privacy issue?

A: Many teams within dunnhumby interact with identifiable data. See our Global Privacy Policy for a fuller explanation.

Q: Can I access our Payroll system to create a list of birthdays in our team?

A: No. You are not allowed to access Payroll data unless you are authorised to do so and it relates to a work matter, such as making changes to their salary or their personal details such as their name and address. A better solution would be to ask your team to provide you with this information.

Q: I'm working on a new marketing campaign in my business area. Can I contact customers who have already provided their e-mail address?

A: We can only use our customers' personal data for the reason it was provided. Customers must have agreed to receive marketing communications from us at the time of providing their details for us to use that information to contact them. We must also consider the customers' marketing preferences: if they have opted out of marketing contact from us, then we must respect their choices. You can contact the Legal team for guidance.

Where can I find out more?

[The Legal team](#)

[The Global Security team](#)

[Global Privacy Policy](#)

[Global Security policies on iSite](#)

[Privacy Hub on iSite](#)

Respect and dignity in the workplace

We all share in the responsibility for ensuring that dunnhumby offers a safe and open environment to work in. We do not tolerate abuse or unacceptable behaviour in any form from employees, clients, suppliers or anyone else.

To make sure that dunnhumby offers a great place to work for all people, we must be sensitive to actions or behaviours that may be acceptable in one culture, but not in another. Some of these behaviours may even be illegal in other countries where we operate.

Bullying and harassment are unacceptable at dunnhumby. These actions go against our values, and can have an impact on a colleagues ability to perform their duties at work.

Employees found to have engaged in unacceptable behaviour can face serious consequences such as disciplinary action, including dismissal, and potentially legal action.

What does it mean for me?

- Create a welcoming and inclusive work environment, and encourage those who you work with to do so by treating everyone as you would like to be treated.
- Don't engage in behaviour that would be considered by others in the team as creating a hostile or intimidating work environment, including making crude / inappropriate jokes or comments.
- Don't spread malicious rumours, or use company resources to transmit communications that might be considered derogatory, defamatory, harassing, pornographic or otherwise offensive.
- Take responsibility for your performance by working in a safe manner, free from the influence from drugs or alcohol. Working while under the influence of drugs or alcohol is dangerous to yourself and others, poses safety risks that will not be tolerated, and may be illegal.
- Remember that the principles of respect, dignity, and fair treatment apply equally when attending off-site company related events, including social events such as Christmas parties, team events, and social outings.

FAQ

Q: My line manager can be intimidating or rude to members of our team. It makes work unenjoyable and difficult. I'm worried that if I speak up it could become worse. What should I do?

A: Abusive or bullying behaviour is never acceptable no matter who is doing it. Our culture is one of respect and inclusion, and any unacceptable behaviour should be reported immediately to your line manager, your HR business partner, or through the Speak Up process. We will always support employees who raise concerns in good faith.

Q: A friend sent me an email with some rude jokes, but I think they are very funny. Can I email them to my team?

A: No. We treat employees with dignity and respect, and what you consider funny might be considered abusive or offensive by others. Always ask yourself whether your actions might be offensive, abusive or intimidating to others. This includes viewing inappropriate material while you are at work.

Q: I know a colleague has been having some difficult times at home. Lately, they have been turning up at work very late and sometimes appear intoxicated, but they are still getting their work done. Should I speak up?

A: Yes. For the good of your colleague you should always raise your concerns if you believe that they are engaging in behaviours that might be dangerous to themselves or others. If you can't talk to them directly, speak with your line manager, HR team, or use the Speak Up process.

Q: I am worried that a manager is acting inappropriately with a colleague. They stand very close to them when they are talking, and I know the manager has been sending inappropriate messages on WhatsApp. What should I do?

A: You should make your manager aware of your concerns in the first instance. If you don't feel comfortable raising your concerns to your manager, you can contact HR team or raise this through Speak Up. All concerns regarding harassment will be taken seriously and will be investigated.

Where can I find out more?

The HR team

Global ER Manager

Responsible use of company IT

Information is key to our success and being able to share it quickly and confidentially enables us to analyse, and respond, and keep our employees, clients, and stakeholders updated.

We each have a duty to use company IT resources responsibly and appropriately. We should protect dunnhumby's assets from misuse, theft, and waste. We have a responsibility to understand how to use dunnhumby devices correctly and securely, including when accessing information via personal devices or when connected to public Wi-Fi networks.

What does it mean for me?

- Use all company resources appropriately and in line with our corporate security policies.
- Ensure laptops, phones and other hardware are never left in public or unsecured places.
- Lock your screen and any electronic devices when you leave your desk or remote working space.
- Use strong passwords and encrypt highly confidential documents in line with our corporate standards.
- Be aware of requirements for retaining or deleting information and manage sensitive data with care, keeping it protected, and dispose of it securely and in line with the Global Privacy Policy.
- Report any lost or stolen devices and other information on security breaches immediately to the IT Helpdesk or your line manager, and the Global Security team.
- Do not misuse company resources for excessive personal use, including telephone, email, mobile and internet access.
- Never share user IDs or passwords or install any software on your allocated devices or download, store, or pass on inappropriate material without the approval from the Global Security team.
- Do not connect any non-dunnhumby or unauthorised devices to your computer or to the network or use file sharing websites without the approval of the Global Security team.

FAQ

Q: I was sent an email including links that I believe may contain a virus. What should I do if I accidentally clicked on the link?

A: You should only open emails from known sources and never click on links or open attachments you are unfamiliar with, or which seem suspicious. If you believe that you have infected your computer with a virus, you should contact the Global Security team immediately.

Q: I received a call from a colleague working from home. They asked me to send several files to their non-work email? Can I do this?

A: No. You should never send any confidential information to a personal email address. Our information is valuable and you should always take care and think before sending to prevent information being stolen or disclosed to unauthorised people.

Q: In a rush to get home, I left my laptop on a train and it has not been found. What should I do?

A: You should report the loss immediately to the Service Desk and let your line manager know. Please also notify the Global Security team for any lost or stolen devices, including laptops, tablets, and phones too.

Q: How should I respond to a caller who says "Hello, this is Ashley from the IT helpdesk. Your computer has picked up a virus, and we need to apply a fix immediately. Can you confirm your email address, user id, and password so that I can apply the fix remotely?"

A: You should not share your password with anyone, not even the help desk. Also, before providing any information to someone, make sure that you can verify who is asking for it. Be aware of social engineering attacks – these are ways of tricking people into giving out information they shouldn't. Social engineers use different ways to do this, such as phone calls, in person, and electronic methods (e.g. email/text).

Where can I find out more?

[The Legal team](#)

[The Global Security team](#)

[Global Privacy Policy](#)

[Global Security policies on iSite](#)

Trading restrictions and sanctions

From time to time, governments impose restrictions which may impact our ability to do business in any given country, or with certain named individuals or companies.

We need to be aware of sanctions or restrictions when doing business around the world. If we break trade restrictions, it could damage the trust our clients have in us, and might result in penalties for the business and our employees.

What does it mean for me?

If you are involved with buying or selling products or services internationally:

- Consider whether it is appropriate to buy from or sell to a company in any given country.
- Do not buy from or sell to countries subject to sanctions or travel conditions.
- Do not work with companies or individuals that appear on UN or other sanction watchlists.
- Speak to the Legal team if you are unclear whether any restrictions or sanctions apply to your activities.
- Make sure that your new suppliers have been properly vetted and approved before you start doing business with them. This means the satisfactory completion of due diligence.

FAQ

Q: I have found a client I want to start working with. Does it matter that the owner of the company is in a sanctioned country if his business is not?

A: Yes. Sanctions laws are often very broad and include the country at issue plus all nationals or individuals of the country under sanction. Always know who you are doing business with, and seek advice before acting. Please contact the Legal or Procurement teams for information on our due diligence process.

Q: I would like to set up a deal to provide our services in a new country for the first time. As long as the business looks good, do I need to consider anything else?

A: Yes. The Legal or Procurement teams can help to conduct due diligence on the client to ensure you know enough about them and the country before we start a business relationship with them. The Sales Governance process is also likely to apply.

Q: Are there countries where we cannot do business?

A: In the first instance, talk to the Legal team. Political and diplomatic developments mean that the list of sanctioned countries and individuals change from time to time, and it is important to check if you are unsure. This is particularly important when we are doing business in a country for the first time.

Where can I find out more?

[Procurement process for new suppliers](#)

[Global Anti-Bribery Policy](#)

[The Legal team](#)

[The Procurement team](#)



Speak Up to raise your concerns

If you suspect that the law, our Code, or any of our global policies or values are not being followed, you should report it. All concerns will be taken seriously and investigated as appropriate, with confidentiality respected.

In the first instance, you should contact your line manager. If you cannot or do not want to speak to your line manager, you can contact a member of the HR, Legal, or Information Security teams.

Alternatively, you can call a country-specific Speak Up number, which you can find on an independent third party website: www.dunnhumby.ethicspoint.com. Select the country you're calling from via the drop-down, and you'll be able to speak to an independent person, in your own language, about your concerns. Alternatively, via that same website, you can submit your concerns in a secure online form.

All calls, and emails logged via the website, are issued with a unique user name and password. This is simple to use, confidential, and, if you wish, anonymous. Access to Speak Up extends to our clients and other stakeholders.

In line with the UK Public Interest Disclosure Act 1998 (and its foreign law equivalents), we will protect the confidentiality of complaints. This means that, if you have acted lawfully and in good faith, and your concerns are genuine, you are legally protected from victimisation and will not be at risk of losing your job or suffering any form of retribution as a result of raising a concern, even if you are mistaken.

Finally, **dunnhumby does not tolerate retaliation in any form**, and if you feel you are being retaliated against for speaking up, please escalate your concerns to Employee Relations, or the [Legal team](#).

Further guidance can be found in our [Speak Up policy](#).

dunnhumby **THE WORLD'S FIRST**
CUSTOMER DATA SCIENCE PLATFORM