

Statement of Ethics

What's it about?

- All of us, at every level, have a responsibility to conduct ourselves in a fair, honest and respectful way to create a positive environment for our customers, colleagues and our business partners.
- This Statement of Ethics sets out Asda's expectations for all colleagues to act in accordance with the law, our principles and our values each and every day.
- Doing the right thing also means speaking up when we see others behaving in a way that breaches our culture of integrity. Our Statement of Ethics provides each of us with the tools we need to be a team player, and to speak up for good.

Key Points

- This policy applies to all colleagues in Retail, Home Office and ALS. When we talk about the People Manager, this refers to the person who looks after the People department in your area.
- Our Statement of Ethics will introduce you to the behaviours and conduct that create an honest, fair and objective workplace while operating in compliance with all laws and our policies. It will help you recognise situations that might come up on your job which could be a breach of our company ethics. You'll also learn what to do if you have questions about what is considered ethical conduct.
- Disciplinary action, up to and including dismissal, may be taken against any colleague who breaches our Statement of Ethics.

For advice or guidance on this Statement of Ethics, or to report a concern about a breach of the Statement of Ethics, contact Ethics:

0800 318 405

ethics@asda.co.uk

Your Responsibilities

- You should:
 - act in accordance with the law at all times. If you see a colleague breaking the law, or if you're asked to do something you believe may break the law, discuss it immediately with your manager, People Manager or Ethics.
 - learn the policies that apply to your job. No one expects you to memorise every policy, but it's good to have a basic understanding of the issues covered by each policy
 - ask for help from your manager, People Manager, Ethics or other Asda resources if you have questions about the Statement of Ethics or other policies.
 - immediately raise any concern that you or others may have about requests or actions that may be a breach of this Statement of Ethics or another Asda policy.
 - raise any ethics concerns with a manager or with Ethics. If you raise an ethics concern through a manager and the issue is not resolved, raise it through a different manager or contact Ethics.
 - co-operate with any investigation and report all information in good faith.

Manager responsibilities

- All management colleagues are responsible for creating an environment that encourages compliance with our Statement of Ethics. Supervision of responsible business practices is as important as supervision of performance. To help us maintain the highest standards of ethics, you should:
 - contact Ethics if you are made aware of an ethics issue covered by the immediately reportable criteria (see section on immediately reportable criteria) or for assistance handling an ethics question or concern.
 - ensure our ethics always come first if there is a conflict between our ethics and business objectives.
 - lead by example and encourage your colleagues to act with integrity at all times to avoid even the appearance of a breach of our ethical standards.
 - make sure other colleagues in your area are not making the same mistake, if an ethics issue arises with one of your colleagues.
 - ensure open communication by encouraging colleagues to ask questions concerning our Statement of Ethics.
 - never cover up or ignore any ethical conduct problem, address any matter raised promptly and seek guidance if necessary.
 - appreciate colleagues who raise issues.
 - never retaliate against anyone for raising an ethics issue, assisting in an investigation or participating in any proceedings
 - never interfere with any investigation into the matter once an ethical concern has been raised.
 - encourage self-reporting of breaches in business conduct.

No Retaliation

- Colleagues who come forward with concerns play an important role in maintaining a healthy, respectful and productive workplace, as well as protecting our stakeholders.
- These colleagues help our company address problems early – before more serious consequences develop.
- It's important for each of us to create a working environment where everyone can raise concerns of ethics issues without fear of retaliation.
- Retaliation against colleagues who raise concerns or questions about misconduct will not be tolerated and may lead to disciplinary action, up to and including dismissal.
- Concerns should be raised in good faith, which means you have made a genuine attempt to provide honest and accurate information, even if you are later proven to have been mistaken.
- Asda reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly.
- If a colleague voluntarily reports they were involved in a breach of ethics, self-reporting may be considered in mitigation when determining the appropriate disciplinary action to be taken.
- Asda will not dismiss, demote or otherwise discriminate against colleagues for raising concerns. It is also important not to treat colleagues who have raised concerns differently – all colleagues should be treated with respect.
- Any change in treatment towards a colleague who has raised a concern could be seen as a form of retaliation.
- Colleagues who believe they have experienced retaliation after raising an ethics concern should report the issue to their manager, People Manager or Ethics.

Contacting Ethics

- Asda has an Ethics helpline, which is available to colleagues around the world 24 hours a day, seven days a week. The helpline is staffed by an independent organisation, and to the extent possible callers may remain anonymous.

- The immediately reportable criteria outlined below must be reported through these channels.

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Immediately Reportable Criteria

- Colleagues may raise concerns regarding conduct that may breach our Statement of Ethics through the various channels. However, there are certain types of allegations that **must immediately** be reported to Ethics. They are:
 - **Bribery**
 - Providing, offering, promising, requesting, or receiving or being offered any improper or unearned benefit
 - Any breach of the company's Anti-Corruption Policy or related procedures
 - All suspected breaches of anti-bribery laws, for example, any breaches of the U.K. Bribery Act
 - **Officer misconduct**
 - Breaches of the Statement of Ethics by Asda VPs or SVPs
 - **Fraud or theft greater than £75,000 and involving a colleague**
 - **Incorrect records and accounts**
 - Interfering with audits or internal controls, falsifying, misrepresenting, or destroying financial records, reports, or data, or improperly concealing, altering, or manipulating financial records, reports, or data
 - **Information system hacking**
 - Any conduct involving a colleague maliciously gaining unauthorised access to company information systems
 - **Reputational risks, which includes (but is not limited to):**
 - Rape and Sexual Assault
 - Modern Slavery
 - Child labour and human trafficking
 - Romantic involvement or sexual contact with a minor
 - Serious immigration issues (such as knowingly employing an illegal worker)
 - Breach of GSCOP / competition law
 - Money Laundering
 - Serious criminal misconduct (such as organised theft)
 - Retaliation relating to an IRC allegation
 - Potential environmental violations
 - Manipulation of drugs within the pharmacy

Alcohol & Drugs

- Asda is committed to a safe and healthy workplace for everyone. The possession, buying, selling or use of illegal drugs, or being under the influence of drugs or alcohol while at work, is prohibited and will not be tolerated.
- Colleagues should not report to work under the influence of alcohol, nor should they consume alcohol on company property.
- In some instances, colleagues over the age of 18 may consume alcohol at company-sponsored events, assuming the consumption of alcohol is approved in advance by the VP responsible for the area hosting the event.

Discrimination and Harassment

- Each of us is responsible for creating a culture of trust and respect that promotes a positive working environment. This means treating one another with fairness and courtesy in all of our interactions in the workplace.
- We are committed to maintaining a diverse workforce and an inclusive working environment.
- Asda does not tolerate discrimination in employment, employment-related decisions or in business dealings on the basis of an individual's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.
- We should provide an environment free of discrimination to our colleagues, customers and suppliers.
- Harassment involves unwanted conduct that has the purpose or effect of violating a person's dignity or creating an offensive, intimidating or hostile environment. Unwanted conduct can be either physical, verbal, non-verbal or written.
- Examples include:
 - sexual advances, requests for sexual favours, sexually explicit language, inappropriate jokes, remarks about a person's body or sexual activities
 - displaying sexually suggestive pictures or objects, suggestive looks, leering or suggestive communication in any form
 - inappropriate touching
 - using slurs or negative stereotyping
 - inappropriate jokes or "banter"
 - intimidating acts, such as bullying or threatening behaviour
 - any other conduct that shows hostility towards, disrespect for or mistreatment of an individual based on the individual's legally protected status.
- Harassing conduct in the workplace, such as that described above, is prohibited regardless of whether it is welcome or unwelcome and regardless of whether the individuals involved are of the same or different sex, sexual orientation, race or other status.
- Again, Asda does not tolerate retaliation and will not dismiss, demote or otherwise discriminate against colleagues for reporting legitimate concerns.

Inappropriate Conduct

- We believe in maintaining a working environment free of inappropriate conduct such as violent, discriminatory, bullying or similarly offensive language, gestures or conduct.
- While posting information online can be a great way to connect with others, always conduct yourself online in a manner that is consistent with Asda's Social Media policy and our ethics.
- Asda will not tolerate inappropriate conduct or behaviour.

Pay and Working Hours

- We are committed to complying fully with all applicable laws and regulations dealing with pay and working hours.
- Salaried colleagues should work and be paid in line with their contract.
- Hourly paid colleagues should never be asked to perform any work for Asda without pay.

Conflict of Interest

General

- We have a responsibility to all our stakeholders to make decisions strictly on the basis of Asda's interests, without regard to personal gain.
- A conflict of interest can arise when our judgement could be influenced, or might appear as being influenced, by the possibility of personal benefit. Even if it's not intentional, the appearance of a conflict may be just as damaging to your reputation, and Asda's reputation, as an actual conflict. We should always be on the lookout for situations that may create a conflict of interest and do everything we can to avoid them.
- It's your responsibility to tell your manager about any situation you think creates, or could create, a conflict of interest. Managers are encouraged to bring such matters to the attention of Ethics for advice. You also may contact Ethics with any questions you have. Conflict of interest situations can come up in various ways. The following sections outline some of the possibilities.

Financial investments

- You have a responsibility to make sure your personal financial activities do not conflict with your responsibilities to the company. A financial conflict of interest can arise when your judgement could be influenced, or might appear as being influenced, by the possibility of personal financial gain.
Examples of conflicting financial investments are:
 - financial interest in a supplier of Asda, if you have direct or indirect involvement in our business with that supplier;
 - receiving personal compensation from a supplier, if you have direct or indirect involvement in our business with that supplier;
 - using confidential company information for personal gain.
- Additionally, ownership of stocks in a competitor with a market value in excess of £10,000 must be disclosed in writing to Ethics. Ethics will work with you to determine whether or not a conflict or a potential conflict exists and how it should be handled.

Outside employment

- Colleagues should avoid employment or outside interests that may create, or give the appearance of creating, a conflict of interest. For example, management colleagues working for a competitor is deemed to be a conflict.
- Hourly-paid colleagues should check with their managers before accepting employment with a competitor to determine if a conflict exists. Factors for consideration include similarity of position and job responsibilities. Similarly, colleagues may not work for a supplier if they have any influence (either direct or indirect) over the supplier's product or the supplier's business with Asda.
- Colleagues may operate and work in a side business as long as it does not create a conflict of interest with their work at Asda.
- This means the side business cannot interfere with your responsibilities as an Asda colleague, be similar in nature to your role as a colleague, benefit from the use of Asda assets, supply products to Asda or reflect negatively on Asda.
- If you have a question about whether outside employment is a potential conflict, contact your manager or Ethics.

Former employment

- When a former colleague who is a Senior Manager or below takes a position with or on behalf of a supplier, Asda will not do business with that colleague for a period of one year following his or her separation if the former colleague is dealing with a business area in which he or she worked or had business influence.
- Asda will not do business with former Senior Director or above for a period of one year regardless of the area in which the former colleague worked.
- Ethics may, in partnership with the relevant VP, determine a different time period is reasonably warranted under the circumstances. All conflict determinations must be submitted to Ethics in advance for a written opinion.

Personal relationships with suppliers

- Colleagues should not conduct business with individuals at suppliers with whom they have social or other relationships if the relationship would give the perception a business influence is being exerted. We believe in basing our relationships with suppliers on efficient, fair and lawful business practices.
- The selection of suppliers must be made on the basis of objective criteria, including integrity, quality, price, delivery, adherence to schedules, product suitability, maintenance of adequate sources of supply and Asda's purchasing practices and procedures.
- We must treat our suppliers with respect, fairness and honesty.
- We must not take undue advantage of a supplier by using Asda's business influence. Also, we should expect our suppliers to follow all applicable legal requirements in their business practices, as well as our supplier standards.
- If you believe you may be perceived as having an inappropriately close relationship with a supplier, or appear to be exerting a business influence on the supplier, inform your manager or contact Ethics for guidance.

Gifts & hospitality

- Gifts and hospitality can play a positive role in building relationships with ASDA's customers, suppliers and other third parties. However, this activity can also place ASDA and you at risk of accusations of unfairness, favouritism or even breaking the law. Consequently, the offering, giving and receiving of gifts and hospitality should be used sparingly and should always be done in full compliance with the Gifts and Hospitality policy.
- It is important to remember that you must never give or receive any gift or hospitality, regardless of its value, where there is an intention to bribe or to influence a business decision.
- You should never ask for or expect any gifts or hospitality from a customer, supplier or other third party. Any gifts or hospitality given or received should always be modest and in line with ASDA's values. Actively seeking gifts and hospitality may actually damage business relationships and may also be in breach of regulations such as GSCOP (Grocery Suppliers Code of Practice).
- You are not permitted to give or accept any gifts and hospitality that would amount to a significant event, regardless of the value. **'Significant events'** include invitations to closed or high-demand events (e.g. sporting events, concerts, theatre shows).
- Any gifts or hospitality given or received must be within the financial limits set out in the Gifts and Hospitality policy and the relevant approvals must be given in advance. These should be logged on the gifts and hospitality register.
- You must ensure that any gifts or hospitality given or received must be logged on the Gifts and Hospitality register by completing the Gifts and Hospitality Declaration form and sending it to gifts@asda.co.uk. The form can be found on the Ethics page on One Asda or through the gifts icon on your desktop.
- Your attendance at hospitality event is considered as an extension of your role at ASDA. As such you will be expected to behave in accordance with ASDA's values and expectations and in accordance with the disciplinary policy.
- When you are establishing a new business relationship, make sure all parties are aware of our gifts and hospitality policy.
- You should immediately tell your manager or Ethics about any gift you've been offered or received if you feel that gift might breach our policy. If you have any questions about gifts or hospitality, you should seek advice from your manager or Ethics.

Personal relationships with colleagues

- At Asda, we want to maintain a working environment in which colleagues can perform effectively and achieve their full potential. We all are responsible for creating a climate of trust and respect and for promoting a productive working environment.
- A conflict of interest exists when you manage someone with whom you have a family or romantic relationship. A family relationship includes the following relatives by birth, adoption, marriage, domestic partnership or civil partnership: your spouse, children, parents, siblings, grandparents or grandchildren, as well as anyone who currently is a member of your household, whether or not you are related. It also may include other close personal relationships, such as with godparents. Even if you're acting properly, your relationship will likely be seen as influencing your judgement. This can damage morale and disrupt workplace productivity. Therefore, you may not directly or indirectly supervise any family members or any colleague with whom you have a close personal relationship or are romantically involved.
- This includes situations in which you may be able to influence that colleague's terms and conditions of employment or that colleague may be able to influence the terms and conditions of your employment.
- You should ask for guidance from your manager or contact Ethics whenever an issue comes up regarding a personal relationship.

Asda Assets

- We have a responsibility to use Asda property and assets for Asda business and not allow them to be used for any type of personal gain.
- You are responsible for maintaining Asda property under your control and should take reasonable steps to protect it from theft, misuse, loss, damage or sabotage.
- Asda monitors communications tools, including the content and usage of such tools.

Fair Competition and Fair Dealing

- We are committed to complying with all competition, fair dealing and antitrust laws applicable to our business.
- These laws help protect competition to enable open markets and enhance productivity, innovation and value for customers.
- Our policies and actions demonstrate our interest to encourage competition by complying with all applicable competition and antitrust laws, as well as engaging in truthful and accurate sales and marketing practices. In doing so, we will thrive as a company and continue to help our customers save money and live better.
- For specific information on applicable laws or to seek advice, contact the GSCOP / Competition compliance team or Legal.

Intentional Dishonesty

- Striving for excellence means operating our business with high integrity and never conducting or participating in deceptive, dishonest or fraudulent activities.
- These activities are not only unethical, but may also be breaking the law.
- You should manage your particular area of business with as much transparency as possible. You should also encourage a working environment that supports the contributions of your colleagues and is based on our company's ethical values.
- Acts of fraud or dishonesty are more likely to occur in environments with insufficient controls or unrealistic expectations. To maintain excellence in our operations, encourage transparency, honesty and realistic expectations.

Financial Integrity and Accounting Irregularities

- Asda requires honest and accurate recording and reporting of financial information to make responsible business decisions.
- All financial books, records and accounts must accurately reflect financial transactions and events. They must conform to generally accepted accounting principles and to Asda's system of internal controls. No Asda document or record may be falsified for any reason.
- You should not hide, alter or disguise any business transactions and you should not make unofficial records of Asda's accounts.

Insider Trading

- It is illegal to buy or sell shares or other securities on the basis of material, non-public information or inside information.
- Inside information is any material, non-public information a reasonable investor is likely to consider important when making an investment decision.
- Some common examples include periodic sales or earnings information prior to the public release of such information, projections of future earnings or loss or news of a significant event such as a pending merger, a change in operations structure or a change in executive management.
- It also is illegal to communicate or tip inside information to others so they can buy or sell shares or other securities on the basis of such information.
- If you are aware of inside information about Asda or any other company, including our suppliers or business partners, you are prohibited from trading directly or indirectly or tipping others to trade in stocks or other securities of that company.
- These same restrictions apply to any person living in your household or who is financially dependent upon you, as well as to any entity or securities account you may control. As Asda colleagues, we all must remember to:
 - never buy or sell shares or other securities of any company while you have inside information about that company;
 - never recommend anyone buy or sell shares or other securities of any company while you have inside information about that company;
 - never disclose inside information about Asda to anyone outside of Asda (including your family members), unless such information has been released to the general public or unless such

- disclosure has been approved by the Legal department, and only after the Legal department has informed you that adequate steps have been taken to prevent misuse of the information;
- only disclose inside information to people within Asda on a need-to-know basis;
- never attempt to manipulate market prices, or spread market rumours or false information.
- If you have questions or concerns about insider trading, contact the Legal team or Ethics.

Restrictive Trade Practices

- We will not participate in any activity intended to restrain trade or promote a refusal to conduct business with customers or suppliers in countries where such a refusal would breach applicable law. If you learn of any such activity or communications, contact the Legal department.

Anti-Corruption

- Asda believes in fair, free and open markets. We also believe in promoting good government.
- We do not tolerate bribery, corruption or similar unethical practices of any kind.
- Asda strictly prohibits anyone acting on behalf of Asda, whether directly or indirectly, from making or receiving bribes or improper payments.
- Asda's Anti-corruption Policy forbids us from paying, offering or authorising payment of money (or anything that has value) to improperly influence anyone. This also applies to payments made through a third party acting on Asda's behalf.
- This also covers small or minor benefits to influence someone improperly. Our stance on improper benefits is firm – regardless of local practice or custom, or even harm to our business.
- We must avoid any interaction with a public official, employee of a government owned company or political organisation that could even appear improper. This includes any person who exercises a public function or who works for a government at any level (e.g., customs, members of the armed forces or police) a political party or campaign (including unpaid staff), a public international organisation (e.g., the World Bank) or a government-owned or government-controlled enterprise (e.g., NHS).
- A contract with a state-owned or public entity requires prior written legal team approval and the approval of the Anti-corruption Compliance team. You must immediately report any suspected breach of these rules or any requests for a bribe.
- For further guidance on this topic, contact the Anti-corruption Compliance team or Ethics.

Anti Money-Laundering

- We are committed to complying fully with all applicable money-laundering laws throughout the world
- Be alert to the following activities:
 - Types of payments associated with money laundering, such as multiple money orders, volume purchases of prepaid products such as gift cards or large cash transactions;
 - A customer or other third party who is reluctant to provide complete information, provides false or suspicious information or is anxious to avoid reporting or recordkeeping requirements;
 - Unusual domestic or foreign fund transfers that indicate scam activities or fraudulent schemes;
 - Structuring a transaction to avoid requirements, such as conducting multiple transactions below the reportable threshold amounts.
- Asda has established rules concerning acceptable forms of payment. For further guidance on this topic, please contact the Compliance department.

Right to Work

- We will not hire, recruit or refer for a fee, anyone who does not have the right to work.
- It is our responsibility to inspect, verify and document the identity and employment authorisation of every new colleague.
- We also are responsible for re-verifying the continuing right to work of each colleague by requesting further documentation when their initial work authorisation has expired.
- All persons we hire must provide proper documentation and verification of their right to work in the country where they are to be employed.

- In complying with immigration laws, it is important that we follow our policy against employment discrimination on the basis of national origin or possible citizenship status. We require all employment agencies, contractors and others doing business with us to fully comply with all immigration laws.

Environmental responsibility and Health and Safety

- We all must care for the safety and well-being of our colleagues, customers and communities.

Environmental responsibility

- Asda is committed to conducting business in a socially responsible and ethical manner that protects the environment.
- We are committed to environmental protection and preservation of our natural resources. We also are responsible for complying with all applicable environmental laws and regulations.
- This responsibility is a core foundation of our commitment to environmental sustainability.
- We must all act ethically in regards to environmental issues to further our goal of helping people live better and to ensure a better world for generations to come.

Health & Safety

- Asda also is committed to protecting the health and safety of our colleagues, customers and communities because we care for each other's well-being.
- Conducting our business in compliance with all health and safety laws is crucial to protecting each other from harm.
- As Asda colleagues, we must always comply with all relevant health and safety laws and policies and never ignore a potential health and safety concern.
- Acting ethically in regards to health and safety issues is critical to our corporate goal of providing a safe shopping and working environment.
- If you have questions regarding environmental or health and safety issues, please contact the Ethics & Compliance department.

Product & food safety

- Food and product safety are more than a priority or regulatory requirement; they are part of our culture.
- As Asda colleagues, we must comply with all applicable food and product safety laws and regulations in our daily business.
- With thousands of suppliers around the world, we recognise our important obligation to require our suppliers to adhere to stringent food and product safety expectations, laws and regulations. If you have any questions or concerns regarding food or product safety and the regulations or requirements that apply to your area of the business, please contact the Ethics & Compliance department or Ethics.

Protecting personal & business information

- In our daily business, we may be exposed to personal and business information about colleagues, customers, suppliers and our own company.
- It's our responsibility to protect this information in accordance with applicable laws, our policies, including our records retention requirements and our company beliefs. Information may be physical (on paper) or electronic. You should only collect or save business or personal information needed to perform your job. You must manage such information securely through its lifecycle and in accordance with Asda's records management and Privacy requirements.
- Confidential company information is divided into three classes of data: highly sensitive (high security), sensitive (medium security) and non-sensitive (low security).
- Examples of ways to protect highly sensitive or sensitive information include:
 - accessing the information for business purposes only;
 - sharing it with other colleagues for legitimate business purposes only;
 - preventing unauthorised access (for example, locking up highly sensitive data);
 - returning all highly sensitive and sensitive information to Asda along with any other Asda property upon termination of employment;
 - if there is no business need for keeping the data and no hold for legal purposes, deleting it permanently and/ or disposing of it by placing it in a shredder or confidential bin; never throw it away.

- If you believe you have personal information (information that identifies or relates to an individual) or confidential company information that needs to be shared outside the company, seek approval from Privacy and Records team before sharing information.
- Trade secrets are an example of business data we must protect. In our pursuit of striving for excellence, we have invested in the development of systems, processes, products, business procedures and technology – our trade secrets – that have made us a leader in the retail industry and give us a competitive edge.
- All trade secrets are highly sensitive data and must be kept secure. In addition to protecting our trade secrets, it's our policy to respect the trade secrets of others.
- No colleague may reveal the trade secrets of the companies with which we conduct business or companies with which they were previously employed.
- All colleagues should ensure their use of social media does not compromise the confidentiality of Asda trade secrets, highly sensitive or sensitive business information.
- Personal information about customers, suppliers and colleagues must also be securely managed. Asda's Privacy Policy must be followed.
- Do not access or collect such information unless necessary to perform your job and only as directed by your manager. If you suspect there may be a breach of such personal information, notify a manager, People Manager, Privacy or Ethics.
- Specific departments within our company may have special privacy rules or procedures.
- We must read, understand and stay current on information that applies to our specific areas of the business and job functions. Additionally, we must follow the applicable records management requirements. If you have questions about the record-keeping requirements that apply to your job, please contact the Privacy and Records team in the Ethics & Compliance department.

Government & Political activities

Governmental contracts and enquiries

- We should not enter into any contract or agreement with any government entity for any purpose without prior written approval from the Legal and Anti-corruption Compliance departments.
- This specifically includes accepting bids, contracts or purchase orders for products and services.
- Failure to follow this requirement may result in Asda incurring significant compliance obligations and related expenses.
- You must immediately report all enquiries from government entities or investigators to your manager or contact the Legal department. All enquiries from government entities and investigators must be answered accurately and completely.

Political involvement

- Participation in the political process outside of work and during non-work time is admirable. You can make lawful contributions of personal funds to political activities; however, ASDA will not reimburse you for those activities unless required by law.
- Corporate funds shall not be provided to political candidates, entities or organisations without the express knowledge and written consent of Asda's Corporate Affairs department. You cannot use your job title or company affiliation in connection with personal political activities unless that information is required by law.

International trade

- All countries regulate international trade transactions covering activities such as imports, exports and financial transactions. For example, all inbound merchandise entering the commerce of a country must clear customs prior to being released and delivered to the recipient. At customs, merchandise is examined for compliance with regulations and assessed for the payment of duties and taxes, where applicable. It's important we all keep the following points in mind:
- Make sure a thorough check of all regulatory requirements has been performed before attempting to import and export merchandise. Regulatory requirements apply to both the merchandise and the documentation.
- Documentation must be complete and accurate, including description, prices and the parties to the transaction.

- Internal controls must be established to ensure compliance with all regulatory requirements, including any recordkeeping obligations.
- As an Asda colleague, you must be familiar with the various trade rules and regulations that apply to your work, including not only the trade laws of the UK, but also the laws in all other countries that may affect your work at Asda. For example, some governments may administer a variety of trade restrictions, such as embargoes and sanctions against a number of countries, including nationals of those countries.
- Transactions with certain designated individuals and organisations, such as terrorist organisations, drug traffickers and weapons proliferators, also are prohibited even though those individuals or organisations may not be associated with any particular country's embargo. Always consult the Ethics & Compliance department prior to entering into international trade negotiations or transactions.

Media Statements

- Communication in the age of social media has changed the way we live and work. When events are unfolding or when people are simply looking for information, you may be viewed as a source of information about the company.
- With regards to making public statements to media outlets such as television, news programmes, local newspapers or trade publications, Asda must ensure the accuracy of all information it provides to the public. You must receive prior written approval from the PR and Corporate Affairs department before making any public statement, whether written or verbal, to such media outlets. For statements about financial matters, contact the Finance department in addition to the PR and Corporate Affairs department prior to making any statement or conducting any interview.