



Code of Business Conduct



Ethical Business Conduct & Anti-Corruption

Code of conduct & business ethics

At Rite Foods Limited, we hold ourselves to the highest standards of integrity and fairness. It is not just about following the rules, it is about doing what is right, treating people with respect, and ensuring our business operations are transparent.

We believe that by upholding these principles, we build stronger relationships with our employees, customers, and partners. Every decision we make is guided by our commitment to integrity, and we work hard to maintain an open, honest environment in all our business dealings.

Being fair and ethical also means we take responsibility for our actions. Whether it is how we compete in the market or how we interact with others, we make sure that our conduct reflects our core values. We know that fairness is not just about compliance, it is about doing what is right, every time. That is why we aim to lead by example in all aspects of our business.



Anti-monopoly practices.

Rite Foods Limited is committed to fostering fair competition and avoiding any form of anti-competitive behavior, in compliance with the Federal Competition and Consumer Protection Act (FCCPA), 2018, and applicable guidelines issued by the Federal Competition and Consumer Protection Commission (FCCPC).

- The company must not engage in practices that exploit a dominant position to the detriment of consumers or competitors.
- Employees and representatives must not participate in agreements (formal or informal) with competitors to fix prices, divide markets, limit production, or rig bids.
- Distributors and partners must be selected on fair, non-discriminatory terms. Practices that limit competition or create artificial barriers are prohibited.
- Communication with competitors must not involve discussions that could lead to coordinated actions, especially on pricing, sales strategy, or market allocation.



Anti-bullying and anti-harassment

- Rite Foods Limited is committed to providing a work environment, where everyone, irrespective of their employment cadre and status in the business feels safe, respected, and confident to add value to the organization.
- We provide trainings and awareness programs to enlighten our people and ensure that this commitment is strictly adhered to at all times and in all situations.
- Any behaviour that undermines our anti-bullying commitment, whether directly bullying or indirectly by aiding and abating, will be swiftly and decisively addressed to protect our workplace culture.
- We maintain a workplace where discrimination and harassment cannot thrive.
- Employees and everyone in the business is treated with respect, regardless of their religion, gender, race, age, or any other characteristic. Any reported incidents are thoroughly investigated and addressed promptly to uphold a culture of inclusivity and respect.



Prohibition of Unfair Trade Practices

We are committed to maintaining fair competition and upholding ethical business practices in all of our transactions. The following actions are strictly prohibited as unfair trade practices, and we expect all employees to adhere to these guidelines. For a more detailed explanation, please refer to the Antimonopoly Act Compliance Manual.

● Collaborative Boycott

We will not engage in any form of collusion with other businesses to block transactions or encourage others to do the same. Our goal is to foster healthy competition, and we respect the right of every company to operate freely without interference or coercion from outside entities.

Dumping Sale






We refrain from selling goods or services at prices that are significantly below the cost of production or procurement, with the intention of harming the businesses of other companies. Our pricing strategies are always fair, reflecting the true value of our products or services, and we aim to compete based on quality, not on damaging other businesses.

Price Fixing

We will not enter into agreement, understanding or discuss with two or more competitors to set, maintain, or stabilize prices at a certain level, with a view to gain business advantage. This is a violation of the Federal Competition and Consumer Protection Commission Act and can harm consumers, stifle innovation and reduce competition.





Competition

-  We believe that healthy competition is essential for driving innovation and delivering the best to our customers.
-  We do not engage in practices that could be considered unfair or that might give us an advantage by bypassing regulations.
-  Whether in cases of contract negotiations, product marketing, or during engagement with suppliers, we obey competition laws and do our best to create a fair playing ground for everyone in the industry.
-  We avoid actions that could harm others in the marketplace or mislead customers
-  We believe we can build a business that not only succeeds but does so in a way that supports the long-term health of the market as a whole.



Conflict of Interest

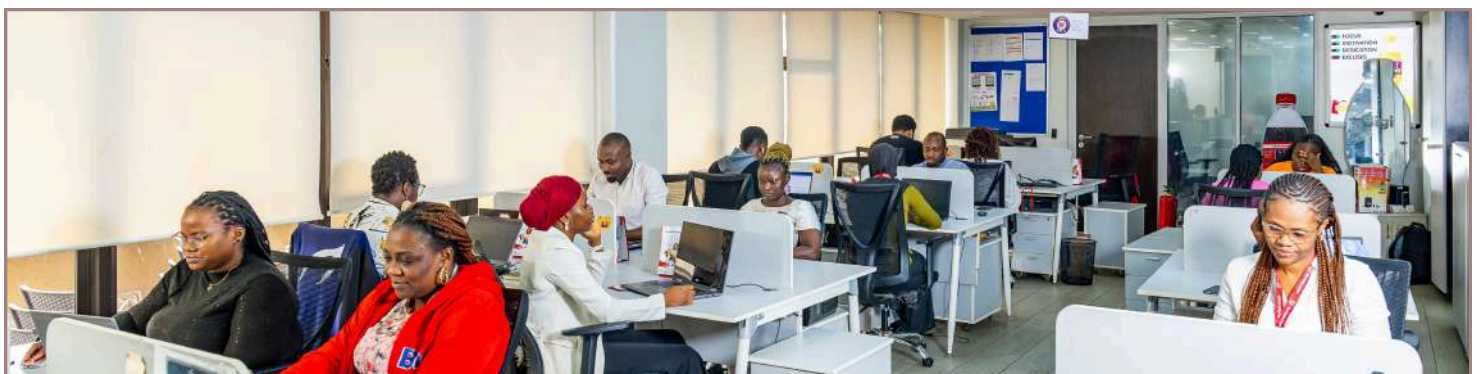
Rite Foods Limited maintains a zero-tolerance policy for undisclosed conflicts of interest in all business activities. All employees, managers, directors, and stakeholders must avoid situations where personal, financial, or external interests could conflict, or appear to conflict, with the company's duties and decisions.

-  All potential conflicts must be declared in writing to the Compliance Officer or Human Resources using the official Conflict of Interest Disclosure Form.
-  All disclosures will be reviewed, assessed, and resolved by the Compliance Team or Executive Committee, with appropriate actions such as recusal, divestment, or reassignment.



Anti-Bribery & Corruption

- Bribery is strictly prohibited at Rite Foods.
- We understand that even the perception of bribery can damage our reputation and the trust of our people, customers, suppliers, and other partners.
- We maintain zero-tolerance for bribery, whether it is offering or accepting bribes. We also make sure our employees and partners understand the consequences of such actions, both legally and within our corporate culture.
- Everyone at Rite Foods is expected to act with honesty and transparency in every transaction.
- We provide training to ensure that our team knows how to handle situations that might be seen as unethical.
- We comply with all relevant laws and regulations designed to fight corruption, and we implement strict internal controls to prevent any corrupt practices from taking place within our organization.
- Corruption undermines trust and fairness, and we make sure our staff, customers, vendors, contractors, and all other partners know that this behavior is highly unacceptable.
- We take extra steps to ensure that we encourage our employees to speak up if they suspect anything is wrong. Through a clear reporting process and regular control, we make sure that we are doing everything possible to prevent corruption in our organization.





Gifts, Entertainment, and Hospitality

- Rite Foods collaborates with business partners and other stakeholders to grow together. The Company may extend gifts as an expression of goodwill to its stakeholders.
- However, employees are not expected to receive gifts or hospitality from vendors, contractors or any other third party as gratification for work done or in the course of employment with the company.
- Where it is impracticable to reject gifts, employees must immediately declare such to the Head, HR and Admin for necessary actions as contained in extant policies on gifts and hospitality.



Whistleblowing & Anti-Retaliation

- We want every employee to feel comfortable reporting concerns about violations or unethical practices.
- We provide secure ways to report such issues and we assure that these reports are treated fairly, discreetly, and with utmost urgency.
- Any form of retaliation against whistleblowers is strictly forbidden. The company prohibits retaliation against any employee, ad-hoc staff, contractor, vendor, consultant, and partner who reports suspected misconduct, unethical behavior, or legal/regulatory violations, whether anonymously or directly.
- We ensure that every concern raised is handled with the utmost confidentiality, and anyone who attempts to punish another for speaking up will face disciplinary action up to termination.
- The company encourages early reporting and assures whistleblowers of its commitment to their protection and safety.