



CODE OF CONDUCT FOR UK Pet Food MEMBERS

This Code forms the rules of UK Pet Food. As such, it is a condition of membership that it is adhered to by all members.

This Code is aimed at maintaining high public trust in UK Pet Food and its members. The Code is established because of the critical importance to UK Pet Food and its members in maintaining such trust.

To that end this Code embodies the principles and provisions which are essential for the conduct of UK Pet Food's activities.

This Code has been promulgated by the Executive Committee of UK Pet Food and is subject to revision from time to time.

REPUTATION

1. The UK Pet Food exists to promote the interests and reputation of pet food manufacturing in the United Kingdom.
2. Members must therefore not act in any way that brings pet food manufacturing and/or UK Pet Food into disrepute.
3. Where a member believes that the actions of another member, or its own actions, have, or are likely to bring pet food manufacturing and/or UK Pet Food into disrepute, they should report such actions to the Chief Executive of UK Pet Food in writing. The procedure in clause 11 below will then be followed. Where such actions are believed by the member to constitute criminal or quasi-criminal conduct (such as the breach of health and safety legislation or of competition law), members should report such actions to the police or the appropriate regulatory authority.

CONFIDENTIALITY

4. UK Pet Food is committed to maintaining the highest level of integrity in all our dealings with members. To this end, UK Pet Food shall always endeavour to maintain commercial confidentiality and protect personal information received in the course of providing UK Pet Food services.
5. Members should also endeavour to maintain any commercial confidentiality and

UK Pet Food, Aviation House, 125 Kingsway, London WC2B 6NH

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www.ukpetfood.org

Registered Office: 15 High Street, Brackley, Northants. NN13 7DH Registered No: 3139685

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protect personal information received from UK Pet Food or in the course of their membership. Nothing in this paragraph obliges a member to act in a manner contrary to any law or legislation. In particular members must be aware of their obligations under competition law.

USE OF UK Pet Food LOGO

6. UK Pet Food grants a non-exclusive licence to members to use the UK Pet Food logo on websites and other forms of communication for the purposes of indicating membership of UK Pet Food.

Members must only use the UK Pet Food logo to indicate membership and must observe any further directions given by UK Pet Food from time to time as to colours, size, manner and appearance, and, usage of the logo. It should not be used on products or to imply that a product meets legal or other standards.

CODES OF PRACTICE

7. Members shall conform to the rules of UK Pet Food and any guidelines set out by UK Pet Food, including this Code.

ANIMAL WELFARE

8. Members must comply with any legal requirements relating to animal welfare. Failure to do so may be deemed to be acting in a way that brings pet food manufacturing and/or UK Pet Food into disrepute in breach of clause 2 above.

COMPETITION POLICY

9. Members shall comply with the UK Pet Food Competition Law Compliance Policy (the "Policy"). Compliance shall include members ensuring that all members of staff having dealings with UK Pet Food are informed about the Policy.
10. Members must take individual responsibility for complying with competition law and are advised to seek legal advice if they are unsure about the application of this Code or the Policy.

BREACHES OF CODE OF CONDUCT

11. Alleged breaches of this Code should be brought to the attention of the Chief Executive who shall inform the Executive Committee. The Executive Committee shall consider what action should be taken in the interests of UK Pet Food. Members making a complaint may request to the Chief Executive that their complaint and/or their identity be kept confidential – this will be at the complete discretion of the Chief Executive.
12. The Executive Committee may consider that no further action is to be taken, or, that

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further action is to be taken.

13. If the Executive Committee decides that further action is to be taken, it shall itself or, by appointment of a sub-committee, investigate any allegation of a breach of this Code and produce a document containing the allegation and the reasons that the allegation has been made. This document shall be provided to the member against whom the allegation has been made, who will then have the opportunity to respond with their own document.
14. In the meantime, if all parties agree, a conciliation meeting may be arranged at which both sides can state their position and arrive at a mutually agreed course of action. If agreement can be achieved, the formal procedure in clause 13 above will be stopped and a report made to the Executive Committee of the agreed outcome. If agreement cannot be reached, then the formal procedure will continue.
15. If the formal procedure stated in clause 13 is to continue the Executive Committee or its sub-committee will, upon receipt of the documents containing the allegation and the response to the allegation, consider them both and reach a decision as to whether (i) any breach of this Code has been established, and, if so (ii) what action it should take in respect of any breach.
16. The actions open to the Executive Committee or its sub-committee after deciding that the Code has been breached are (i) no further action, (ii) a formal request that specified remedial actions are taken within a given timescale, (iii) issue of a formal reprimand, (iv) imposition of a period of suspension from UK Pet Food or, (v) proposal of a resolution that the member be expelled from UK Pet Food on the grounds that their continued membership is harmful to, or is likely to become harmful to, the interests of the UK Pet Food.
17. In the event that the remedial actions in (ii) above are not taken within the agreed timescale, the Executive Committee or its sub-committee may decide to escalate the action to a formal reprimand or other action as described above.
18. If the Executive Committee or its sub-committee propose a resolution that a member be expelled, the procedure for expulsion from UK Pet Food set out in paragraph 11.2.4 of the Articles of Association of UK Pet Food shall then be followed.
19. UK Pet Food shall owe no duty of confidentiality to any party in respect of the decision to take any of these actions.
20. Members and the Executive Committee must not do anything to publicize this process in any way. Any formal statements about a Member being expelled or disciplined will be made by UK Pet Food.

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TURNOVER DECLARATION

Please indicate below the **pet food related** turnover of your Company for 2025 at gross sales volume to the nearest £m.

Full name:	
Company name:	
Turnover to closest £m:	
Signature:	
Date signed:	

Notice period

A member is required to give UK Pet Food notice of resignation by 30th June 2026, for membership to cease at the end of 2026. Resignations after 30th June, would take effect at the end of 2027, and you will still be required to pay your membership fee.

Termination of membership should be sent to the attention of Beth Morgan & Michael Bellingham.

beth@ukpetfood.org, michael@ukpetfood.org

MEMBER CHARTER

Members of UK Pet Food have a fundamental commitment to **nutrition, safety and quality**. Members aim to work together and share knowledge raising the standards of the pet food industry.

UK Pet Food members are aware that there is strict legislation governing the manufacture of pet food. The main legal requirements for pet food manufacture, marketing and use are laid out in the Animal Feed Regulations 2010 and the Animal By-Products Regulations 2011. A summary of the legislation governing pet food both directly and indirectly is provided in the Annex.

In addition to the legislation, the pet food industry has adopted a number of voluntary Codes of Practice and guidelines which support UK Pet Food members in complying with legislative requirements and promoting best practice. On joining UK Pet Food, members are made aware of the following guidance which can be used in the manufacture and marketing of their pet food products.

Please tick to confirm you have read the following:

- FEDIAF Guide to Good Practice for the Manufacture of Safe Pet Food**
- FEDIAF Nutritional Guidelines**
- FEDIAF Code to Good Labelling Practice for Pet Foods**

UK Pet Food works with FEDIAF, our European Association to review and update the guidance as legislation, knowledge and technologies change.

Furthermore, UK Pet Food has produced Animal By-Products Guidance. The document is intended as guidelines for the handling of animal by-products and summarises the legislation and proposes methods and systems to assist members of the UK Pet Food in meeting the requirements for regulatory compliance.

Finally, members agree to abide by the **UK Pet Food Code of Conduct** which recognises that UK Pet Food exists to promote the interests and reputation of pet food manufacturing in the United Kingdom. **Members must therefore not act in any way that brings pet food manufacturing and/or UK Pet Food into disrepute.**

I confirm that I am aware of the industry FEDIAF Codes of Practice, the UK Pet Food Animal By-Products Guidance, the UK Pet Food Code of Conduct and agree to adhere to these so far as is reasonably practicable.

Sign & Date

Annex

LEGISLATION GOVERNING PET FOOD

The reference list below relates to all the main aspects of pet food manufacturing and marketing. The list provides guidance on the key pieces of legislation that should be referred to when considering the total manufacturing process and marketing of pet food. This list is not exhaustive and members are advised to monitor developments in legislation through UK Pet Food circulars and information received from legislative bodies.

PRIMARY LEGISLATION

- The European Communities Act 1972
- The Agriculture Act 1970

SECONDARY & DIRECTLY APPLICABLE LEGISLATION

- The Animal By-Products Regulations 2011
 - Regulation (EC) No 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption
 - Commission Regulation (EU) No 142/2011 (implementing Regulation (EC) No 1069/2009)
- The Animal Feed Regulations 2010
 - Commission Directive 82/475/EEC laying down the categories of feed materials which may be used for the purposes of labelling compound feedingstuffs for pet animals
 - Directive 2002/32/EC on undesirable substances in animal feed
 - Regulation (EC) No 1831/2003 on additives for use in animal nutrition
 - Commission Directive 2008/38/EC establishing a list of intended uses of animal feedingstuffs for particular nutritional purposes
 - Regulation (EC) No 767/2009 on the placing on the market and use of feed
 - Regulation (EU) 68/2013 on the Catalogue of feed materials
- The Feed (Hygiene and Enforcement) Regulations 2005
 - Regulation (EC) No 1831/2005 laying down the requirements for feed hygiene
- Feed (Sampling and Analysis and Specified Undesirable Substances) Regulations 2010
 - Commission Regulation (EC) No 152/2009 laying down the methods of sampling and analysis for the official control of feed
- The Genetically Modified Animal Feed Regulations 2004
 - Regulation (EC) No 1829/2003 on genetically modified food and feed
 - Regulation (EC) No 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms

Turnover Declaration & Member Charter 2026

- The Official Feed and Food Controls Regulations 2009
 - Regulation (EC) No 882/2004 on official controls for feed and food law on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules

ADDITIONAL LEGISLATION TO CONSIDER

- The Animal By-Products (Identification) Regulations 1995
- The Avian Influenza (H5N1 in Poultry) (England) Order 2006 *
- The Avian Influenza (H5N1 in Wild Birds) (England) Order 2006 *
- The Business Protection from Misleading Marketing Regulations 2008
- Consumer Protection Act 1987 (Part III)
- The Consumer Protection from Unfair Trading Regulations 2008
- The Environmental Protection Act 1990
- The Environmental Permitting (England and Wales) Regulations 2007
- The Environmental Protection (Prescribed Processes and Substances) Regulations 1991
- The Organic Products Regulations 2009
- The Packaging (Essential Requirements) Regulations 2003
- Price Marking Order 2004
- The Producer Responsibility Obligations (Packaging Waste) Regulations 2007
- Trade Descriptions Act 1968
- The Trade in Animals and Related Product Regulations 2011
- The Transmissible Spongiform Encephalopathies 2012
- The Veterinary Medicines Regulations 2006
- The Weights and Measures Act 1985
- The Zoonoses Order 1988

COMPETITION LAW COMPLIANCE POLICY



This Competition Law Compliance Policy governs the conduct of UK Pet Food members' dealings with UK Pet Food. UK Pet Food expects all its members to comply with the Policy, and not to prejudice any of the aims or activities of UK Pet Food by any departure from it.

A list of Do's and Don'ts at UK Pet Food meetings and a list of Golden Rules for UK Pet Food members have been prepared.

1. General

Meetings of competitors under the guidance of UK Pet Food are not prevented by competition law. However, UK Pet Food members must not use the forum provided by UK Pet Food in order to coordinate their commercial activities or to influence the conduct of a competitor. Each UK Pet Food member must exercise its independent business judgment in pricing its products and services, dealing with its customers and suppliers, and choosing the markets in which it will compete. Any activity that could create even the appearance of a restriction or distortion of competition must be strictly avoided.

2. Individual Responsibility

Whilst UK Pet Food expects all its members to comply with this Policy in the course of its dealings with UK Pet Food, members must take individual responsibility for complying with competition law and are advised to seek legal advice if they are unsure about the application of these rules.

3. Discussion Topics

UK Pet Food can discuss issues of general concern to UK Pet Food members, share non-sensitive (historical, aggregated and/or publicly available data) and report on pricing trends and market trends within the food and drink industry over a period of time in general terms but UK Pet Food must not talk about commercially sensitive issues or current market information or exchange data which allows the practices of individual companies to be easily identified (other than information already in the public domain).

It is not possible to provide an exhaustive list of objectionable discussion topics, as the competitive significance of many issues is dependent upon the context in which they are raised. However, this Policy prohibits any discussions or exchange of information between UK Pet Food members that might constitute or imply an agreement or concerted practice concerning:

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- prices or price factors, including discounts, rebates, and reductions;
- costs and demand structure;
- profits and profit margins;
- output and sales;
- ingredient/nutritional data if it contains commercially sensitive information such as cost and supply elements;
- technical data that relates to current and future research and development into new recipes/ingredients/products;
- production capacity and forecasts;
- market shares and sales territories;
- investments and marketing plans;
- bidding or refraining from bidding;
- credit conditions or any other terms or conditions of sale;
- exclusionary practices;
- selection, rejection, or termination of customers or suppliers.

Discussions or exchange of information on issues such as product reformulation and biofuels must be restricted to non-sensitive (historical, aggregated and/or publicly available data) information and must not influence commercial practices or prices. Members are permitted to exchange opinions and experiences in relation to general industry studies/statistics/market research provided that confidential information relating to individual companies is not disclosed.

UK Pet Food members must ensure that any confidential information disclosed to UK Pet Food is done on a confidential basis.

4. Meetings

If a discussion or a meeting involves practices contrary to this Policy, UK Pet Food will terminate that discussion or meeting immediately. Members should feel free to terminate a discussion or leave a meeting if they feel that this Policy has been breached.

Agendas are circulated to members in advance of the meeting and minutes are produced as an official record of the meeting.

Breakout meetings before or after the formal UK Pet Food meetings at which individual competitors exchange commercially sensitive information are strictly prohibited.

- ENDS -

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