

Suppliers Code of Conduct

The Openfield Partnership: More than just grain.

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| Related documents | Business Ethics (Bribery & Gifts) Policy, Purchasing Policy, Modern Slavery & Human Trafficking Policy, Health and Safety Policy, Human Rights Policy, Anti-Tax Evasion Policy, ESG Policy | Food & Feed Fraud Threats & Vulnerabilities Assessment, Environment Social and Governance (ESG) Policy, Child Labour Remediation & Protection of Young Workers Policy, Whistleblowing Policy | |

Overview

1. INTRODUCTION

Openfield Agriculture Ltd. are committed to conducting our business sustainably, responsibly, and to the highest professional and ethical standards. We value our relationships with our Suppliers and strive to work with and support them to achieve our mutual objectives.

Openfield expects high legal, ethical, environmental, and employee relations standards both within our business and that of our Suppliers, who may also be our Members. These minimum standards are set out in this Suppliers Code of Conduct (the Code) and must be met by any suppliers that sell products or services to Openfield.

SUPPLIERS' COMMITMENT

By supplying products or services to Openfield, you agree that: -

- You will comply with the requirements in this Code, so far as is reasonably practicable.
- You will have appropriate systems in place to ensure continuous compliance, and when necessary, to demonstrate such compliance.
- Any breach of the Code may lead to discussions about the future of any contracts held between you and Openfield.

We will keep this Code under regular review and reserve the right to update or amend it and publish it on our website [Openfield.co.uk](https://openfield.co.uk). If you require any support or guidance with any of this Code, please e-mail compliance@openfield.co.uk or ring 01476 862730 and ask for the Compliance Department.

2. COMPLIANCE WITH THE CODE

The purpose of the Code is to maintain the transparency and integrity between us and our Suppliers. We therefore require our Suppliers, their workers and their representatives (e.g. our Suppliers, agents and subcontractors) to agree and comply with the Code.

As well as requiring all Suppliers to comply with the Code, Openfield may carry out appropriate risk assessments and a Supplier Due Diligence Questionnaire will need to be completed where we believe any high-risk products or Suppliers are identified. Such Suppliers may be subject to further queries to assess, identify and control any quality and supply chain risks.

We retain a right to audit our supply chains and our Suppliers if deemed appropriate.

3. COMPLIANCE WITH LAWS AND REGULATIONS AND PRIORITY OF STANDARDS

In carrying out its agreement(s) with Openfield, Suppliers must (in addition to complying with the standards set out in the Code) understand and comply with all applicable laws and regulations, including but not limited to the laws & regulations relating to business integrity, employment, health and safety the environment.

Competing standards shall be addressed as follows:

- If there is a conflict between any applicable laws or regulations, and the provisions of an agreement with Openfield and the provisions of the Code, Suppliers shall meet the most stringent standard.
- If there is a conflict between the provisions of an agreement with Openfield and the provisions of the Code, Suppliers shall meet the most stringent standard.

4. WORKING PRACTICES AND WELLBEING

Openfield is committed to the health, safety and wellbeing of those involved in our operations and supply chains. Our working practices respect and uphold the legal human rights and labour rights for our colleagues, contractors and all those that work with or for Openfield.

Modern Slavery

- Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships.
- We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business and as far as reasonably practicable within our wider supply chains. Labour supplier audits are carried out by the Compliance Team.
- We are also committed to ensuring there is transparency in our approach to tackling modern slavery in our own business and throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all our contractors, suppliers and business partners. As part of our processes, we have policies against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same standards.

Equality & Diversity

- Openfield is committed to encouraging a supportive and inclusive culture

amongst our whole workforce. We recognise that promoting diversity and eliminating unlawful discrimination in the workplace is beneficial to both us, our colleagues and all in our professional dealings.

- We will not tolerate unlawful discrimination, directly or indirectly, against colleagues, customers, suppliers, candidates or any other person associated with Openfield to comply with the protected characteristics covered by the Equality Act 2010.
- No person(s) directly or indirectly employed, and within any associated third parties/contractors, should be subject to bullying, harassment (written, verbal or non-verbal), sexual harassment, discrimination or victimisation.
- Openfield takes a proactive approach to dealing with such behaviour, which should not be encouraged, tolerated, or taken lightly. We expect our Suppliers, and its supply chain, to adopt the same approach to ensure a professional working environment that embraces diversity and provides equality of opportunity.
- We expect that our Suppliers will not discriminate in terms of hiring, compensating, training, in advancement or promotion, termination, retirement, or any employment practice based on race or national origin, gender, gender identity or reassignment, sexual orientation, religion or beliefs, age, marital or pregnancy or maternity status, disability, union membership or political affiliation or any other characteristic other than the worker's ability to perform the job subject to any accommodations required or permitted by law.

Health & Safety

- Employees and contractors have a right to go home safely at the end of the working day and not to be made ill by the work activities they undertake.
- We expect that our Suppliers will provide their employees with a safe and healthy place to work and within a working environment that complies with all applicable laws and regulations.
- Openfield expects Suppliers to have an effective health and safety policy which covers all reasonably foreseeable risks in the areas they control.

Wages, Benefits and Working Hours

- We expect our Suppliers to adhere to all applicable laws regarding working hours, wages, social security payments, overtime payments, paid annual leave and other leave (i.e. sickness).
- All employees of Suppliers must be provided with written and understandable information regarding their employment conditions in respect of wages, benefits and working hours prior to commencing employment.
- Any employees of our Suppliers must be paid at least the minimum wage and benefits established by applicable law.
- All overtime must be voluntary, and workers must be given the necessary time off, paid annual leave and holidays as required by local laws.

Whistleblowing Procedure

- We recommend our Suppliers establish a whistleblowing procedure which can be used by employees, workers and representatives to raise confidentially any issues of potentially illegal, unethical or unsafe business

- practices without fear of reprisal.
- Openfield's Whistleblowing Policy is available upon request.

5. ETHICS & INTEGRITY

Openfield is committed to conducting our business with honesty and integrity and we expect all our colleagues, suppliers, and their supply chain to maintain high standards in all business dealings and relationships.

Conflicts of Interest

- The Supplier must bring to Openfield's attention if anyone within the Supplier's business has an actual or potential conflict of interest with someone who is part of Openfield as soon as the potential for a conflict arises.
- A conflict of interest could be, but is not limited to, an interest or economic tie between the parties.

Anti-Bribery & Corruption

- Openfield has a zero-tolerance approach to bribery and corruption. Suppliers must ensure that their employees and associated persons act in accordance with all applicable laws, statutes and regulations relating to the prevention of bribery and corruption that is applicable to your business globally (including but not limited to the UK Bribery Act 2010).
- Any form of bribery or corruption is strictly prohibited and could result in the termination of our relationship with you and subsequent legal action. Care should be taken when giving or receiving gifts or hospitality related to Openfield's activities.
- All parties should adhere to Openfield's Business Ethics (Bribery & Gifts) Policy (available upon request) or demonstrate that they apply at least equivalent standards within their business.

Unfair Business Practices

- Suppliers must comply with all applicable competition laws; including but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids.

6. LEGAL COMPLIANCE

All Suppliers must comply with all applicable laws and regulations in the jurisdictions in which their business operates and hold any necessary permits.

Financial Crime

- Openfield conducts its business in full compliance with current financial crime legislation (for example; anti-money laundering, terrorist financing, anti-facilitation of tax evasion legislation) and is active in avoiding engagement with suspicious or fraudulent transactions.
- Suppliers should ensure that they have policies and procedures in place to address ways to identify and manage/mitigate financial crime risks.
- All parties should adhere to Openfield's Anti-Tax Evasion Policy to ensure compliance with the Criminal Finances Act 2017.

Data Protection

- Openfield is committed to protecting and respecting privacy, and we comply with the General Data Protection Regulation (GDPR) (EU2016/679) in the way we collect, store and process personal data.
- All Suppliers should comply with all applicable data protection laws and requirements (including the UK GDPR) and support Openfield in its own compliance with data protection laws and principles, wherever possible.

Information Security

- Suppliers are required to implement appropriate technological and security measures to safeguard the confidentiality and integrity of any Openfield data they hold.
- Suppliers must ensure that there is no unauthorised access to the information by third parties.

Export Controls & Sanctions

- Suppliers must comply with all relevant export controls and sanctions when providing goods or services to Openfield. We expect all licenses and permits to be obtained to ensure the delivery of products or services.

7. ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)

At Openfield we take responsibility for our actions and encourage a positive contribution towards improving standards for all those we work with, minimizing our impact on the environment and improving the quality of the local community. Our ESG Policy is freely available on our website.

Openfield's expectations

- Our expectations will vary according to the nature of the goods or services being provided to us, but we expect our Suppliers to ensure their business and the goods (and raw materials used) they produce comply with all applicable environmental laws and international treaties relating to but not limited to waste disposal, emissions, discharges, and the handling of hazardous and toxic materials. Suppliers shall ensure they will only use packaging materials that comply with all applicable environmental law and treaties.
- In considering the environment we encourage our Suppliers to take environmental responsibility and include environmental considerations in the purchasing and procurement processes.
- Suppliers should understand and where reasonable, measure Scope 1 and Scope 2 CO2 emissions and establish validated data for its base year calculations. Suppliers should identify the steps necessary to move to Carbon Net Zero, if relevant, with clearly mapped stepping-stones, timelines and targets for emissions reductions.
- Suppliers should strive to have a policy of water stewardship, which aims to reduce water intensity to produce the crops we trade.
- Suppliers should aim to send zero food waste to landfill and follow the

appropriate sections of the Simpler Recycling requirements (businesses with less than 10 employees have until March 2027 to comply) see [Simpler Recycling 2025](#)

Environmental Responsibility

- Suppliers should minimise the negative impacts their business operations have on the community, environment, and natural resources throughout their supply chain.
- Suppliers must obtain, maintain, and keep current all applicable environmental permits and licenses. Suppliers shall abide by and follow relevant operational and reporting requirements.
- Suppliers shall ensure that they identify the environmental impacts of their operations, products and / or services. In addition, and where possible, Openfield Suppliers shall investigate ways to improve energy efficiency and reduce greenhouse gas emissions and water consumption, as well as ways to minimise waste generation and promote reuse and recycling.
- Suppliers shall endeavour to minimise air pollution. Suppliers shall identify, monitor, control and treat, as required prior to discharge, all harmful and nuisance airborne emissions
- Openfield Suppliers shall ensure that chemical and other materials, that pose a hazard if released to the environment, are identified, and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- Suppliers shall treat wastewater and solid waste generated from operations and sanitation facilities according to legal requirements and good environmental practices and monitor any discharges.
- Suppliers shall have a simple Environmental Policy, and implement an appropriate Environmental Management System (EMS) relevant to the size and complexity of the company.

Plastic Packaging Tax (PPT)

- PPT applies to all businesses that import plastic packaging or products contained in plastic packaging into the UK or manufactures plastic packaging in the UK.
- All Suppliers shall ensure that they have taken all necessary steps to be compliant with the PPT and that all PPT liabilities will be paid on any goods and packaging provided to Openfield.

8. PRODUCT QUALITY

Products provided by Suppliers need to be safe and compliant with applicable legal and regulatory standards in the UK. We expect our Suppliers to implement appropriate quality control management systems to ensure the integrity of the products sold to Openfield.

Food and Feed Fraud

- Food and feed fraud is unfortunately becoming an issue globally and nationally. Openfield has a Food and Feed Fraud Policy which is available

upon request. Openfield will not tolerate any intentional adulteration of arable crops for economic gain. If such adulteration is brought to our attention, we will be obliged to notify the relevant authorities via the [National Food Crime Unit](#)

9. NON-COMPLIANCE WITH THE CODE

Openfield will support and assist, where reasonably practicable, in collaboration with its Suppliers, to help with the implementation of the Code.

- Suppliers should monitor compliance with the Code and report any breaches as soon as possible to Openfield. Where Openfield becomes aware of a breach of the Code by the Supplier, Openfield may require the Supplier to remediate the breach to ensure compliance with the Code within an agreed time-frame.
- If the Supplier fails to act within an agreed time-frame or fails to remedy the situation at all, Openfield may suspend its business relationship with the Supplier (including any existing or future contracts).
- Where it is a material breach, Openfield will consider terminating its business relationship with the Supplier, if appropriate, (including any existing or future contracts).
- Any non-compliance or misconduct can be reported by Openfield colleagues and Suppliers via Protect on 020 3117 2520 or www.protect-advise.org.uk as stated in Openfield's Whistleblowing Policy which is available upon request.
- No Supplier should retaliate or take disciplinary action against any employee or worker who has reported a breach of the Code or other wrongdoing in good faith.