

Corporate Social Responsibility Policy

The Openfield Partnership: More than just grain.

Author	Gaynor Hannen/Ellie Webb		
Document Reference	HR21-01	Version	3
Date	January 2022	Review Date	January 2023
Related documents	Colleague Handbook, Whistle Blowing Policy, Anti-Bribery Policy, Modern Slavery & Human Trafficking Policy, Equality & Diversity Policy, Purchasing Policy, Environmental Toolkit & Energy Policy		

Contents

1. Policy Statement
2. Code of Business Ethics
3. Health & Safety and Security
4. Employment
5. Customer & Community
6. Environment

1. Policy Statement

Openfield seeks to be a good corporate citizen in everything we do.

We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the Business' operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and standards to ISO26000.

The Openfield Executive Directors support the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for Openfield and provide practical guidance for

all our colleagues.

ICARE Values Proposition – it is Openfield’s expectation that all colleagues adhere to the values below:

Integrity

We act with integrity and always treat our members, customers, and our colleagues with respect. We do what is right, not just what is easy.

Challenging

We are passionate about what we do and work together to improve things which sometimes means challenging each other in an appropriate manner.

Accountable

We use our initiative, do what we say we will do and take responsibility for our actions.

Responsive

We are service driven and build relationships based on trust. We work proactively together to deliver quality and excellence in all we do.

Engaged

We are enthusiastic about our work and understand the value of our contribution. We always think and behave in a positive way.

Compliance, monitoring and reporting.

Compliance with this policy is continuously monitored and subject to review by the Executive Directors, supported by the HSE Manager. Compliance is to be reported to colleagues through the Corporate Social Responsibility Report.

Each Manager is responsible for ensuring that the principles set out in this policy are communicated to, understood, and observed by all colleagues and for ensuring compliance in their area of responsibility.

Colleagues who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established by the Business. Any such reports are taken seriously, and a full investigation will be undertaken.

The Executive Directors will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Business’ Code of Business Ethics, which is set out in Section 2. The other areas covered by this policy are Safety and Security (Section 3), Employment (Section 4), Customer and Community (Section 5) and Environment (Section 6).

Openfield expect our many dedicated suppliers to adhere to the highest standards of quality and integrity in all aspects of their business.

2. Code of Business Ethics

This code applies to all of the operations of Openfield and sets out the minimum standards which the Executive Board of Openfield expects from all colleagues in their internal and external dealings with other colleagues, customers, stakeholders and third parties.

2.1 Basic Standards of Conduct

- (a) We conduct every aspect of our business with honesty, integrity, and openness, respecting human rights and the interests of our colleagues, customers and third parties.
- (b) We respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- (c) We maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

To support the above, we provide colleagues with Business Ethics training. Openfield are members of Supplier Ethical Data Exchange (SEDEX) and undergo independent third party audits every 3 years which are posted on the SEDEX website. We also ensure our labour agencies are approved by the Gangmasters and Labour Abuse Authority (GLAA) and we audit these agencies annually.

2.2 Colleagues

All of Openfield will behave in a way that supports the Openfield Values of Integrity, Challenging, Accountable, Responsive & Engaged (ICARE) and:

- (a) are committed to creating and maintaining a safe and healthy working environment for its colleagues.
- (b) strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- (c) respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether or not to join a trade union and will negotiate in good faith with the properly elected representatives of its colleagues, where appropriate.
- (d) support equal opportunities in; recruiting, employing, and promoting colleagues only based on objective criteria and the qualifications and abilities needed for the job to be performed.
- (e) maintain good communications with colleagues through regular communication.
- (f) assist colleagues in realising their potential.

To support the above Openfield are currently operating the following schemes:

- [MINDFUL EMPLOYER](#) Charter
- Employee Assistance Program
- Wellbeing Champions scheme: trained Mental Health Coaches

- **Contributory Pension & Health Insurance**
- **Childcare Vouchers**
- **Workplace Charitable Giving**
- **Flexible Working**
- **Training such as Openfield Development Program and Graduate Training Scheme**
- **ClearReview continuous performance management and development programme**
- **Regular communications from our CEO and the WellBeing Champions**
- **OpenDoor: Colleague Listening Group**

2.3 Customers

Openfield is owned by around 4000 farmer members and works with thousands of other farmers to market British grain. In addition to marketing grain for farmers and grain stores, Openfield is a National fertiliser distributor and manufactures and sells quality seed. Openfield is also a member of the Fertiliser Industry Assurance Scheme (FIAS) and a member of the Agricultural Industries.

2.4 Members

- (a) We conduct our operations in accordance with the principles of good corporate governance.
- (b) We provide timely, regular, and reliable information on the business to all our shareholders.

2.5 Business Partners

- (a) We aim to develop strong relationships with our suppliers and customers with whom we have dealings, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- (c) We conduct operations in accordance with the principles of fair competition and applicable regulations.

To support the above Openfield currently run:

- **Biannual NFU Cereals Development Program**

Openfield has many long-standing relationships with some of the best-known British food and drink brands.

2.6 Compliance with Law

All colleagues comply with the laws and regulations applicable wherever they do business. Appropriate training is provided, as necessary.

2.7 Business Integrity

- (a) No Openfield Colleague may offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial

gain and no colleague may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If a colleague is in any doubt as to whether he or she may accept an offer, that colleague should discuss the issue with his or her manager.

- (b) Openfield accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (c) No undisclosed or unrecorded account, fund or asset may be established or maintained.
- (d) Openfield does not facilitate, support, tolerate or condone any form of money laundering.

2.8 The Environment

- (a) Openfield is committed to making continuous improvement in the management of its environmental impact.
- (b) We work with our partners to promote environmental care, increase understanding of environmental issues, and disseminate good practice.

2.9 Community Involvement

Openfield strives to be a good corporate citizen and to fulfill our responsibilities to the societies and communities in which we operate.

2.10 Conflicts of interest and confidentiality

- (a) Whilst Openfield respects the privacy of its colleagues, all Openfield colleagues are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Openfield.
- (b) Openfield colleagues and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- (c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) must be disclosed to and discussed with a colleague's manager.
- (d) Information received by anyone in the course of their employment must not be used for personal gain or for any purpose other than that for which it was given.
- (e) Where information is confidential, that confidentiality must be respected.

3. Safety and Security

3.1 Safety

The health and safety of our colleagues and customers is our paramount concern. Safety underpins all our operations, and our central motto is:

If you cannot do it safely, don't do it.

We have developed the following high-level health and safety policy, which underpins our health and safety policy:

(a) **General Statement**

The Executive Directors are committed to ensuring, so far as is reasonably practicable, the health, safety, and welfare of all its colleagues at work and others.

(b) This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property, and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all colleagues
- Working safely is a condition of employment

(c) The Executive Directors are tasked to ensure that so far as is reasonably practicable:

- There are adequate arrangements and organisation for health and safety in place within their area of responsibility
- Responsibilities for carrying out these arrangements are clearly allocated.
- All colleagues are given appropriate information, instruction, and training
- Adequate supervision is provided to ensure compliance with policies and safe systems of work
- All other legal and statutory duties on health and safety incumbent upon Openfield are complied with in all their operations and locations
- Performance targets are set to achieve a step change in safety performance
- Adequate resources are allocated, and competent persons are appointed to support the achievement of the above objectives.

(d) We continually monitor the health and safety performance of our operations which are subjected to periodic safety audits to assess performance. We also conduct Safety Surveys to assess the Safety Culture of the business. To support Health and Safety of Colleagues we undertake risk assessments of all operations and Occupational Health Monitoring as required. In the case of diseases potentially affecting colleagues, we follow Government guidance. Consideration to our colleagues' physical and mental wellbeing is also made.

The Executive Directors are:

- Presented a monthly report on health and safety.
- Informed of all fatal and notifiable injuries to colleagues or other persons within 24 hours.

The nine key **safety principles** with which all Openfield colleagues are required to comply are set out below:

- **Do not endanger yourself or others.**
Report any hazardous condition or practice that may cause injury to people property or the environment.

- **Obey all rules, signs, and instructions.**
If you do not understand speak to your manager before you start work.
- **Keep your work area clean and tidy.**
Disorder causes accidents, wastes time, energy, and materials.
- **Wear protective clothing and equipment as required.**
Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
- **All accidents, incidents and near misses must be reported immediately to your manager.**
Seek immediate help and first aid (if necessary).
- **Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.**
- **Use only the correct tools and equipment for the job.**
Check that they are in good condition before use and use them safely.
- **Before lifting, assess the load and your capability to move it.**
Make sure you get help with any heavy or awkward items and follow approved techniques.
- **If you have any suggestions to improve safety in your workplace, tell your supervisor or manager.**

We also require contractors to comply with this policy whilst they are working at our premises.

3.2 Security

General Statement

Security is a key issue for our colleagues and our business. We recognise the range of security issues which can arise and have implemented the following high level security policy.

- (a) The Executive Directors are committed to ensuring, so far as is reasonably practicable, the security of our colleagues at work, commodities in our care and our property.
- (b) The threats to security, which includes information relating to our fertiliser business are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all our colleagues.
- (c) Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We heighten the profile of security to ensure all colleagues understand why they should and how they can play their part. Our efforts bring greater personal and corporate security and business benefit.

- (d) This statement provides guidance and direction to all colleagues on what is both required and expected of them. We are confident our colleagues appreciate the reasons for this and the benefits to them, their colleagues, our members, and our property.
- (e) We aim to achieve, so far as is reasonably practicable:
 - A secure environment for colleagues in their work.
 - Security of our property; and
 - Security of our systems and processes.
- (f) We have developed systems to monitor our performance on security within our operations. All operations are subject to periodic inspection and review.
- (g) Openfield recognises that this security policy needs to be supported by actions and processes to ensure delivery. The following measures are in place to assist this:
 - A security strategy is in place, which underpins our policy, identifies the key strategic security issues for the business and the approach being taken to address these. This is designed to provide a structure, which allows measurement, review, and ongoing refinement.
 - Colleagues are actively encouraged to report security concerns. To support this there is a Whistle Blowing Policy which allows colleagues to report any concerns. This is specifically designed to give colleagues the confidence to report their concerns even in circumstances where they may find conventional management routes difficult.
- (h) This approach to security allows us to ensure we have a process to translate our policy into effective implementation within the organisation. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business. We also require contractors to comply with this policy whilst they are working at our premises or on our behalf.

4. Employment

In formulating its employment policies, Openfield is guided by the ACAS (Advisory, Conciliation and Arbitration Service) Codes of Practice. Our employment policies cover all colleagues at Openfield.

4.1 Equality and Diversity Policy

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 the Company and our colleagues. We are a **MINDFUL EMPLOYER** and are positive about mental health.

Our aim is to provide equality and fairness for all in our employment and to create and maintain a work environment where everyone feels respected and able to give of their best.

Selection for employment, promotion, training or development and the provision of pay or any other benefit will be based on aptitude and ability.

We will not tolerate unlawful discrimination, directly or indirectly, against colleagues, customers, suppliers, candidates, or any other person associated with Openfield because of the protected characteristics covered by the Equality Act 2010, including:

- Age.
- Disability (both physical and mental).
- Gender reassignment.
- Pregnancy and maternity.
- Marriage/civil partnership.
- Race including colour, nationality and ethnic or national origin.
- Religion or belief.
- Sex.
- Sexual orientation.

In addition, we will not accept unlawful discrimination against any colleague, customer, supplier, candidate or any other person associated with Openfield because they are thought to have a protected characteristic (i.e., perception discrimination) or because they associate with someone who has a protected characteristic (i.e., discrimination by association).

Our Commitment

- To create an environment in which individual differences and the contributions of all our colleagues are recognised and valued.
- To promote equality and fairness in the workplace.
- To ensure that training, development, and progression opportunities are available to all colleagues.
- To take seriously complaints of unlawful discrimination or victimisation by colleagues, customers, suppliers, visitors and the public and to deal with such complaints promptly and confidentially. Breaches of this policy by colleagues will be regarded as misconduct, or gross misconduct in serious cases, and could lead to disciplinary proceedings, including dismissal, where appropriate.

- To review and update our employment policies, procedures, and practices to ensure fairness and compliance with relevant legislation.
- This policy is fully supported by senior management. The policy and how it is working in practice will be monitored and reviewed annually to ensure that equality and diversity is continually promoted in the workplace.

Legislation and Codes of Practice

We comply with and exceed where possible, current legislation and relevant codes of practice. We monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

Practices and Standard Operating Procedures

We put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

Access to Company Premises

We take all reasonable steps to ensure that our buildings and premises are accessible to disabled colleagues, customers and visitors as required by the Disability Discrimination Act (DDA).

Vehicles

We take reasonable steps to ensure that our vehicles comply with the relevant legislation.

Access to Information

We ensure that information is made available to our customers and colleagues in alternative formats as required. We provide colleagues with a confidential help-line accessible via the internet or phone line with our Employee Assistance Program.

Recruitment

All recruitment is carried out with regard to fairness, equality, and consistency for all candidates at all times. Recruitment practices are inclusive, and we endeavour to ensure there are no barriers to employment of suitable candidates.

Colleague Training

We provide our colleagues with the necessary guidance (contained in the Colleague Handbook) and training at Induction (Insight intranet), to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

Complaints

Any colleague who feels that they have grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures or Whistle Blowing Policy. Customers who feel they have grounds for complaint may contact the Company to pursue the issue. All complaints will be dealt with as promptly and effectively as possible.

Reporting

We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity policy both internally and externally.

Audit

We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

4.2 Human Rights

Openfield supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We aim to deal openly and responsibly with our stakeholders, listening to and working with anyone impacted by our operations.

We will adhere to the following principles in respect of our colleagues:

- a) We treat all colleagues fairly and honestly, regardless of where they work. All colleagues have agreed terms and conditions in accordance with legal requirements and are given appropriate job skills training.
- b) We pay a fair wage reflecting local markets and conditions. We always meet any national minimum wage.
- c) Working hours will be defined within colleagues' contracts. Colleagues may be offered overtime hours from time to time, but there is no obligation to work any overtime. Colleagues are given the option of opting out of the Working Time 48-hour regulations and this is a voluntary decision by colleagues. Overtime is used responsibly, taking into account the seasonal nature of our business, the extent and frequency of hours worked by colleagues and we comply with industry guidelines and national standards where they exist.
- d) Employment with us is freely chosen. We do not employ illegal child labour, forced or bonded labour or enforced prison, or forced overtime. Colleagues are free to leave their employment with us after reasonable notice.
- e) We do not employ anyone under 16 years of age. In job roles considered to be hazardous we will not employ anyone under 18 years of age.
- f) Colleagues have the rights of freedom of association and collective bargaining, and it is important our colleagues have a voice, and they are encouraged to contribute and raise points via our Internal listening forum OpenDoor. We respect the right of our colleagues to choose whether or not to join an external trade union without influence or interference from management should they wish.
- g) We do not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any colleague whose conduct falls below the required standard.

- i) There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation union membership or political affiliation. We have formal grievance procedures through which colleagues can raise issues.
- j) All colleagues will have a safe and hygienic working environment, with Health & Safety Work Instructions to ensure the safety of all colleagues. Colleagues will have access to hygienic bathrooms and rest facilities.

4.3 Data Protection

- (a) We comply with the relevant legislation governing data protection.

5. Customer and Community

5.1 Customers

Our vision is to be an integral part of our farmers' and customers' businesses, building unique relationships that create value. By ensuring our behaviours support our **ICARE values**, we can deliver the highest levels of safety and service and give greater customer and colleague satisfaction.

We:

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services.
- respect the human rights of our customers – our security and revenue protection arrangements are consistent with legal requirements.
- provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden.
- will not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair.
- respect customer privacy and provide protection for personal data in accordance with the relevant legislation.

5.2 Members

We are committed to maintaining open and regular dialogue with all our Members in matters that affect their interests. These range from formal consultation to regular informal contact on a day-to-day or week-to-week basis.

5.3 Suppliers

Ethical Purchasing Policy

- (a) We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on several key suppliers for the delivery of our

core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.

- (b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety, or the environment.
- (c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- (d) All colleagues receive Modern Slavery Training at Induction to understand the morale obligations we all have to eradicate this practice. The training gives colleagues the understanding to recognise the practice and how to report it.
- (e) More specifically we expect our suppliers to:
 - Adhere to business principles consistent with our own.
 - Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
 - Seek to maintain continuous improvement in their supply chain relationship with us.
 - Ensure they adopt and implement acceptable safety, environmental, product quality, human rights, and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products or services supplied to us.
- (f) We will seek to work with our key suppliers to:
 - Develop long-term meaningful relations to the benefit of both parties.
 - Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

5.4 Community

Our relationships with the local communities we serve are therefore very important to us and are an essential part in the growth of our business. When developing our services, we have a role to play in improving services for the community as a whole and not just our individual customers.

We engage with the community at a range of levels as customers, neighbours, potential colleagues, businesses, and residents. We seek to play our part in promoting socially inclusive policies, encouraging the young and disadvantaged and helping older members of the community and the disabled.

In line with our core values (ICARE), we encourage the following elements:

- Engagement with the local communities in which we operate on the quality of our services and any changes to those services;
- Working with local authorities, businesses and other interested parties to promote sustainable transport to reduce congestion and improve quality of life;

- Offering employment opportunities to all sectors of the community through non-discriminatory policies;
- Promoting engagement between our colleagues and the community;
- Supporting local community groups and charities;
- Improving the environment in and around our operations;
- Promoting broader opportunities for workplace learning;
- Working closely with local law enforcement agencies to address anti-social behaviour, crime and vandalism as well as promoting road safety.

To support the above, we provide support to community-based charities and projects by supporting and £4£ matching our colleagues' efforts in fund raising. We also support the Welland Rivers Trust, which is an environmental charity dedicated to the River Welland and its tributaries. Their goal is to reconnect people with the natural and cultural heritage of their rivers and streams, ensuring that they are better valued, protected and have a positive effect on local communities. Their projects are delivering vital work to improve the resilience of our water environment in the face of the climate and biodiversity crises, which helps to support member of our farmer members and colleagues who live in the River Welland's catchment area.

6. ENVIRONMENT

6.1 Environmental Policy

Openfield are suppliers of services and products in the food and drink chain. Our principal activities include the marketing of combinable crops and arable inputs, the associated management of logistics and quality control to standards meeting customer, industry, statutory and regulatory requirements.

We attach maximum importance to matters concerning the environment. Our policy is to meet and, where practical, exceed all relevant regulatory requirements and to minimise any adverse environmental effects caused as a result of our activities or products.

We will continually assess the environmental impact of our operations and, through minimising the use of materials and resources; we will reduce our wastage to the lowest practical level.

Any products will be designed in such a way as to minimise their environmental effects in production, usage, and disposal. Consideration will always be given to the environmental effects of our raw materials sourcing and wherever possible we will use materials and components that can be recycled.

Through strategic planning we will minimise the environmental effect of new developments and aim to include environmental considerations in investment decisions.

Colleague involvement in environmental matters is encouraged at all levels and will be promoted through communications, and a constant reappraisal of working methods and techniques.

Our Environmental Management System, as described in our **Environmental Management**

Toolkit, which applies to all our activities, provides for the setting of objectives and targets and it is our aim to secure continual improvement in environmental performance. Our environmental objectives are listed below.

The Executive Directors are committed to the implementation of this policy and will give full backing to all those authorised to carry it out.

Objectives:

- To operate in full compliance with all environmental regulations, laws, and corporate guidance.
- To minimise pollution and impact on the local environment.
- To minimise waste, wherever possible recycle materials and dispose of all waste through safe and responsible methods.
- To use energy and natural resources efficiently and reduce wastage.
- To coordinate route planning and delivery schedules to realise the dual benefits of reduced fuel consumption and lower exhaust emissions.
- To work with suppliers to ensure they recognise and reduce the environmental impact of their products and transportation.
- To provide relevant training and communication to encourage colleagues and suppliers to suggest, develop and implement new approaches to environmental protection.

6.2 Climate Change Policy

Climate change has now been recognised as an international issue with national governments committed to taking action to reduce greenhouse emissions. As a major transport operator, we recognise that we emit greenhouse gases from operating our vehicle fleet. At the same time, we have a role in supporting governments and communities to reduce the impacts of climate change from road transport by helping to reduce traffic congestion and air.

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies and in line with our commitment to our customers to provide safe, efficient, and reliable services. Our Energy Policy details out targets. We also have a biannual audit under ESOS.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively with our suppliers to improve the fuel efficiency of our vehicles.
- To report bi-annually on our greenhouse gas emissions from all vehicles and property in our ownership.
- To actively promote improved energy efficiency and fuel efficiency within our business.
- To support research into transport policy and the use of alternative fuels.
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.

6.3 Biodiversity Policy

Our policy in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity through the use of resources and discharge of waste products. This Biodiversity Policy is therefore consistent with our broader Environmental Policy, which includes a stated commitment to minimise the environmental impacts of our operations and prevent pollution.

Our policy is to strive to enhance biodiversity where practicable.

Accordingly, our commitments are:

- Where we operate from sites which are designated as being of importance due to their natural habitats, we will work with the relevant authorities and affected parties to ensure protection of these habitats through effective pollution control measures and management plans with the aim of conserving or enhancing the biodiversity of these sites.
- Where we are involved in the development of new sites, we will comply with all relevant statutory requirements and guidelines in respect of designated areas on any of our development sites. Where significant areas of landscaping are proposed, we will aim to promote biodiversity through, for example, sensitivity of planting taking account of any local biodiversity networks or action plans.
- Where we operate from existing sites the potential to promote biodiversity is likely to be limited. The nature of the operations conducted at our sites is such that they are largely covered in hard standing. We will however seek to identify any sites where the potential exists for enhancing biodiversity and over time develop appropriate actions plans to achieve this.
- Where we consider it appropriate to do so, we will support the implementation of the UK Biodiversity Action Plan and Local Biodiversity Action Plans defining areas which require special protection and management to ensure that biodiversity is maintained. We will seek to do this in partnership with the relevant authorities and affected parties, who promote biodiversity on a local and national level and seek to identify ways in which we may be able to support the development of selected schemes or initiatives.