

# SUPPLIER CODE OF CONDUCT

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# FOREWORD



**We are committed to operating ethically and responsibly throughout our businesses with a focus on sustainability, the environment, health and safety and the community.**

In support of our mission to optimise the sustainable use of land, enhance resource efficiency and safeguard the environment, we continually seek to source responsibly, sustainably and ethically. We hold ourselves to the internationally recognised environmental, social and governance standards which are based on the ten principles of the UN Universal Declaration of Human Rights, the UN Global Compact initiative, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. This Code is informed by those principles.

Our business relationships and engagements with suppliers play a key role in contributing to the success of this commitment and we enlist our suppliers to support, embrace and adhere to the standards set out in this Code. In return, we strive to be the trusted partner of choice across our value chain, believing that relationships built on trust, integrity and shared values will be sustainable and beneficial for all.

A handwritten signature in white ink, appearing to be 'S. Coyle', written on a light blue background.

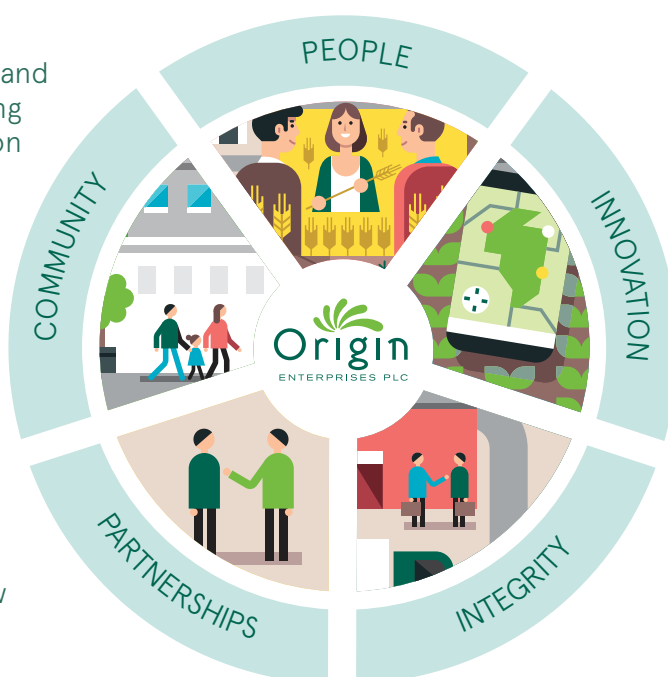
**Sean Coyle**  
**Chief Executive Officer**  
**Origin Enterprises plc**

# PURPOSE AND SCOPE

## The Origin Way

**Origin is committed to the responsible sourcing of goods and services across all of its businesses in alignment with our values. In turn, we seek to build trusted relationships with suppliers who conduct business responsibly, with integrity and transparency.**

**Our five core values** – integrity, community, innovation, people and partnerships – define our guiding principles and set the foundation for our commitment to operate ethically and responsibly throughout our businesses, in the communities in which we operate and in support of sustainable food production systems. This Code of Conduct supports these values in our engagement with our suppliers. We choose to work with business partners who align with these core values and share our commitment to follow the highest ethical standards in conducting business.



This Code sets out the minimum standards we hold our suppliers to across the areas of people and labour, business ethics and compliance, and health, safety and environment. However, we are committed to continuous improvement in our supply chain and similarly encourage our suppliers to adhere to the highest industry and international standards and promote best practices throughout their operations.

## STANDARDS

# PEOPLE & LABOUR

**Origin is committed at all times to upholding international human rights. This commitment is embedded in the cultural values that define our organisation and is reflected in our policies and actions toward our employees, suppliers, clients, communities and countries in which we operate.**

We ask and expect our suppliers to treat all employees fairly, honestly and with respect, including to:

- uphold international human rights and not tolerate the use of forced labour, slavery, human trafficking or the exploitation of children
- provide a workplace free of harassment, abuse and intimidation, including psychological, verbal, sexual or physical harassment, bullying, violence, or threats
- prohibit discrimination against any employee or applicant because of age, race, religion, nationality, gender, gender identity or expression, disability, marital status, family status, sexual orientation, or any other legally protected status
- abide by all applicable national laws and industry standards regarding working conditions, hours, wages and benefits
- respect the rights of employees to exercise freedom of association and collective bargaining

## STANDARDS

# BUSINESS ETHICS & COMPLIANCE

**Origin is committed to applying the highest standards of ethical conduct and integrity in our business activities across all the geographies in which we operate. We operate a zero-tolerance approach to bribery, money laundering, fraud and corruption, in any form.**

We ask and expect our suppliers to conduct business responsibly, with integrity and transparency, including to:

- conduct business in full compliance with all applicable local laws and regulations in the countries in which they operate
- comply with all relevant anti-bribery and anti-corruption legislation in respect of their dealings with Origin, including the Irish Criminal Justice (Corruption Offences) Act 2018, the U.K. Bribery Act 2010 or other relevant legislation
- avoid any conflicts of interest which may include personal relationships, economic interests or other ties to their business with Origin employees
- take appropriate measures to secure and protect all confidential information related to their relationship with Origin
- protect personal data in their care, including through safeguarding the integrity and security of systems, and collect and handle personal data in accordance with applicable data privacy standards and legislation
- respect the intellectual property of Origin and third parties, including by only using trademarks, designs and technology that have been legitimately acquired and/or licensed
- not offer gifts or any personal benefits to Origin employees or representatives which are designed to improperly influence the outcome of any purchasing decision or secure business



## STANDARDS

# HEALTH, SAFETY & ENVIRONMENT

**Origin is committed to ensuring the safety of our employees and complying with all applicable health and safety laws and regulations.**

We ask and expect our suppliers to comply with all applicable workplace legal and regulatory requirements regarding employee health and safety, including to:

- provide a safe and healthy working environment for employees, including through adequate training, appropriate protective equipment and availability of safety information
- maintain clean, hygienic and safe working facilities for employees
- have appropriate controls, systems and procedures in place to prevent, detect and respond to workplace hazards and potential risks to the safety, health, and security of employees in the workplace

## STANDARDS

### HEALTH, SAFETY & ENVIRONMENT *CONTINUED*

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#### **Origin strives to minimise our environmental footprint and make progressive improvements to reduce the environmental impact and enhance the sustainability of our operations.**

We ask and expect our suppliers to abide by all legislation and regulations related to environmental and climate protection and operate in an environmentally responsible and resource-efficient manner, including to:

- comply with all applicable environmental laws and regulations
- obtain and maintain all required environmental permits, licences and approvals for activities
- implement appropriate systems to assess and measure the environmental impacts of operations, products and services and take appropriate steps to continually reduce negative impacts on the global environment across the lifecycle of their products and services
- support the conservation and responsible use of water and other natural resources
- minimise or avoid, where possible, the release of hazardous substances
- manage and minimise the generation of waste and engage in practices and activities to promote reduction, reuse, recycling and other circular economy principles



# COMMITMENT TO THE CODE

## We expect our suppliers to meet or exceed all the standards set out in this Code.

Commensurate with the size and nature of their business, we expect suppliers to have the appropriate processes, policies and systems in place to comply with the standards and to have mechanisms in place to determine and control risks in all areas addressed by this Code.

Suppliers are encouraged to promote open and transparent communications in their organisations and offer employees appropriate avenues for raising concerns about wrongdoing without fear of retaliation.

**Our independent whistleblowing hotline is also open to suppliers for the confidential reporting of concerns about misconduct, unethical or illegal behaviour and is available 24 hours a day, 7 days a week. See: [www.originenterprises.ethicspoint.com](http://www.originenterprises.ethicspoint.com) for details or the hotline numbers below.**

### How to report concerns by call, by country:

Country:	Telephone Number:
Ireland	1800 851 277
Poland	800 005 065
Romania	0800 890 351
Ukraine	0800 801 384
United Kingdom & Northern Ireland	0800 949 6390
Brazil	+55 (0) 800 942 2425 or <a href="http://www.fortgreen.com.br/canal-aberto/">http://www.fortgreen.com.br/canal-aberto/</a>

Where there is a concern, our practice is to work with the supplier partner. Where a supplier is unwilling or unable to comply with this Code, Origin reserves the right to take appropriate steps. This may include not placing any further orders with the supplier or the termination of any associated agreement or business relationship.

This Code is not exhaustive and statutory obligations must be fulfilled. The requirements of this Code are not intended to replace any contractual provisions between Origin and its suppliers and will apply in conjunction with legally binding agreements. If there is any conflict between local laws and this Code, the law will prevail.

For any queries in relation to this Supplier Code of Conduct, please get in touch with your Origin contact or email us at [enquiries@originenterprises.ie](mailto:enquiries@originenterprises.ie).



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