

CODE OF CONDUCT



TABLE OF CONTENTS

A Message from the CEO	3
Introduction to the Code of Conduct	4
Our Commitment to Our Vision, Purpose and Values ('The Origin Way')	5
Our Commitment to People	6 – 10
> Employee Voice and Engaging our People ('Let's Talk') > Developing Our People > Diversity, Inclusion and Equal Opportunities ('You Make our Difference') > Discrimination and Harassment > Violence-Free Workplace > Drug and Alcohol-Free Workplace > Workplace Health, Safety and Wellbeing > Our Health, Safety and Wellbeing Standards > Human Rights > Indigenous Peoples and Use of Resources > Preventing the Exploitation of Others > Freedom of Association > Modern Slavery > No Child or Forced Labour > Wage and Hours Practices	
Our Commitment to Communities and Partnerships	11
> Environmental Responsibility > Community Relations	
Our Commitment to Integrity	12 – 15
> Understanding and Managing our Risks > Anti-Bribery and Corruption > Offering and accepting gifts, services and entertainment > Conflict of Interest > Competition Law > Anti-Fraud > Anti-Money Laundering > Financial Integrity and Responsibility > Inside Information and Share Dealing > Working with Suppliers > Employee Data Protection > Records Management and Retention > Confidential Information	
Our Commitment to Innovation	16
> Intellectual Property > Information Technologies and Electronic Communications > Social Media > Media and Press Communications	
Your Commitment	17
See Something, Say Something (Whistleblowing)	18 – 19



A MESSAGE FROM SEAN COYLE OUR CEO

Our core message is simple: being an employee of the Origin Group means striving towards the highest possible standards of behaviour and ethical business conduct.

Our Code of Conduct and the relevant policies supporting it define the standards expected for everyone who works for us, in all of our businesses, in every function, geography and role.

It represents our commitment to our values, to doing the right thing, personally and professionally, and outlines the standards by which Origin leaders and employees should operate.

Our five core values which make up ‘**The Origin Way**’ define who we are as an organisation – they are the guiding principles for how we should interact, every day. ‘**Integrity**’ is one of our values and is consistent with ethical standards being at the heart of the Group.

Our Code of Conduct applies to me, the management team, our Board of Directors and to each and every one of us. Our aim is to create a culture where everyone adheres to the principles of strong governance and is individually committed to doing the right thing, every day.

We encourage you to seek guidance if there is anything you are uncertain about, or to raise any concern using one of the available channels.



Sean Coyle CEO Origin Enterprises Plc

INTRODUCTION TO THE CODE OF CONDUCT

This Code of Conduct is effective from October 2021 and will be maintained and updated by the Human Resources department. If you have any questions please contact a member of the HR team in the first instance.

This **Code of Conduct** applies to all persons working for Origin or on its behalf (inclusive of any Group Company), in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, work experience students, apprentices, agents, contractors, consultants, third-party representatives, suppliers or service providers, business partners, sponsors, or any other person associated with us, wherever located.

How to Report an Issue

If there is anything you are uncertain about, or if you have any concerns that you wish to report, we would encourage you to speak to your line manager in the first instance. Alternatively or additionally, there are a number of alternative channels available to you, including a number of support functions and our confidential reporting hotline, where you can report any matters anonymously. You can find full details of these at the end of this document as well as in the Group Whistleblowing Policy.



OUR COMMITMENT TO OUR VISION, PURPOSE AND VALUES

Everything we do is directed towards our vision and purpose.

Our Vision

To be the leading and trusted partner of choice to growers and professionals in agriculture, amenity, landscaping and ecology markets.

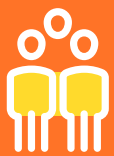
Our Purpose

Optimising the sustainable use of land through integrated solutions.

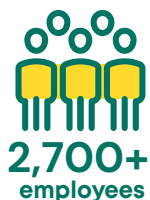
We commit to the highest standards of ethical behaviour and living our values.

Living our **values** creates an environment that will enable us to deliver success for our people, our customers, our partners and for our community.





OUR COMMITMENT TO PEOPLE



We operate locally but act as one Company.

Origin is a people business – we work and learn together, meaning we share our knowledge and moments of brilliance so everyone can benefit.

We have outstanding people, expertise and organisational leadership, and we grow futures together by collaborating with each other and our customers.

We nurture and grow capabilities and talent, prioritise engagement and wellbeing and champion equality, diversity and inclusion.



EMPLOYEE VOICE AND ENGAGING OUR PEOPLE 'LET'S TALK'

We encourage a culture of open communication through our Group-wide Employee Voice and Engagement Programme 'Let's Talk'. Our 'Let's Talk' programme ensures we have input from across our business, from every level of the workforce, enabling business decisions to take account of employee views.

Our 'Let's Talk' programme is designed to ensure that we connect, engage and have meaningful two-way dialogue with all our employees on topics such as, our strategic direction, key initiatives, key challenges, our culture and the work environment.

The elements of our 'Let's Talk' programme includes an annual Employee Opinion Survey, Group level 'Let's Talk' visits, local listening initiatives and regular 'Town Hall' meetings.

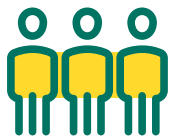
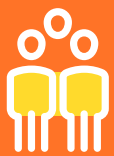
We will always continue to develop our culture of open communication and ensure focus where there are opportunities to improve.



DEVELOPING OUR PEOPLE

We are committed to training and developing our people and recognise the importance of progressing individuals through continuous learning and development. This is a key part of our succession planning and preparing our business for the future.

We provide in-country training programmes to develop our employees and prepare them for future roles. Within this we have our 'IQ' and 'LEEP' development programmes for employees, leaders and emerging leaders.



DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES 'YOU MAKE OUR DIFFERENCE'

Living our shared values fosters a culture of diversity, inclusiveness and empowerment for our people, which enables us to deliver for our customers, our partners and the communities in which we operate.

We aim to foster a diverse and inclusive culture, that attracts and develops diverse talent and creates a workforce that mirrors society and understands its diverse needs.

We are committed to creating an equal opportunity workplace, where recruitment and development are based on the competence, experience, achievements and potential of each individual.

We are an organisation where diverse talents come together and work hard to ensure all our colleagues feel valued, included and have a sense of belonging. Diversity, inclusion and equality are championed at the highest level in Origin, starting with the Chief Executive and the Board. Our leaders and managers are responsible for allowing diversity to thrive and making inclusiveness accessible to all. They live our values, lead by example and promote a culture of equality, diversity and inclusion.

Beyond our leaders and managers, we also expect the commitment of all our employees to embrace these principles, ensure an environment free from discrimination, harassment and victimisation, and bring this culture of inclusion to life through their behaviours, ways of working and ways of interacting with each other.



DISCRIMINATION AND HARASSMENT

We will not tolerate any form of discrimination, bullying or harassment or those who engage in it, facilitate it, or allow it to happen. Our Diversity, Inclusion & Equal Opportunities Policy clearly sets out our commitment and responsibilities to ensure we create an environment free from discrimination, harassment and victimisation.

We believe everyone should be treated with respect regardless of their background. We will not tolerate discrimination based on age, gender, gender reassignment, marriage or civil status, family status, pregnancy or maternity, disability, race (including colour, nationality, ethnic or national origin), religion or belief, sexual orientation, membership of the traveller community or any other characteristics protected by law, and will investigate all alleged discrimination or harassment claims promptly.

Engaging in, facilitating or tolerating any form of bullying, harassment or abuse, or any behaviour that could be regarded as offensive, intimidating, malicious or insulting, is never acceptable and is never permitted. It is everyone's responsibility to ensure that discrimination, bullying or harassment does not take place within Origin.

We want to ensure that any employee who feels dissatisfied with any matter relating to their employment, has an immediate means to raise this and to have this resolved. There are a number of channels available and we ensure these are communicated and promoted. We encourage employees to report any issues or concerns as soon as possible, in confidence, to either their line manager, another manager, their local HR, Compliance or Legal team, or by using our confidential whistleblowing service. Full details of the service are available in this document, on posters displayed at each of our sites and within the Whistleblowing Policy.

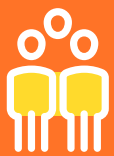
Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited.



VIOLENCE-FREE WORKPLACE

We are committed to ensuring a violence-free workplace.

It is important to us to provide a safe working environment to all employees who work on behalf of the Group. We will not tolerate any acts of violence within Origin.



PEOPLE



DRUG AND ALCOHOL-FREE WORKPLACE

We recognise that we have a responsibility to maintain a safe and productive work environment – an environment that is free from the adverse effects of alcohol, drugs and controlled substances.

The use of drugs or alcohol affects our judgement and our ability to do our work. More seriously, it can put us and other employees at risk of harm. It is important that we are clear about our position in respect of the use of drugs and alcohol, both in the workplace and at work-related social events.

Employees must not use, distribute or possess illegal or unauthorised drugs on any of our sites. Employees whose behaviour, judgement or performance of their work responsibilities is impaired by drugs or alcohol will be prohibited from entering our premises or engaging in Company business.



WORKPLACE HEALTH, SAFETY & WELLBEING

The health and safety of our employees is a primary responsibility of Origin and is an integral part of all our business decisions and work practices. We demand the highest health and safety standards in everything we do, and provide safe and healthy work environments.

We work with employees to develop and support a culture where we are all accountable to each other. By working together, we enable the expected high standards of health, safety and wellbeing to be achieved and maintained. Together we drive a culture of safety and wellbeing at work, ensuring that the safety of our people is an uncompromised principle.

As ever, supporting the physical and mental health and wellbeing of our employees is paramount and we strive to achieve excellence in all that we do. Our Health, Safety & Wellbeing Standards set out our commitment and key objectives, and our Health, Safety & Wellbeing Roadmap drives our vision to ensure anyone working on our behalf goes home safe and well every day.

<https://originenterprises.com/uploads/Origin-Group-HSW-Policy.pdf>

OUR HEALTH, SAFETY & WELLBEING STANDARDS

We provide our employees with advice and support through our Human Resources and Health & Safety Teams, and provide advice and support to our employees through our Employee Assistance Programmes, webinars, online training, and other resources in relation to promoting physical and mental health and wellbeing.



Leadership & Commitment



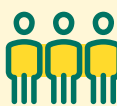
Policy, Planning & Communication



Risk Management & Compliance



Culture



People & Competence



Operations & Performance



Facilities, Plant & Equipment



Incident Management & Emergency Preparedness



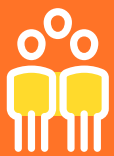
Monitoring & Review



HUMAN RIGHTS

We conduct our business in a manner that respects the rights and dignity of all people.

We are committed to respecting human rights and labour practices in our operations and supply chains and recognise the importance of operating in an ethical and responsible manner. In relation to labour rights, Origin complies with all labour law, national and international codes and conventions. We strive to uphold the principles set out in the United Nations Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact.



PEOPLE

We expect our managers to provide leadership that promotes human rights as an equal priority to other business issues. Everyone who works for or on behalf of Origin is responsible for ensuring that their actions do not impair the human rights of others. We develop an open culture with good communication channels based on open dialogue and active listening, and encourage employees to report any issues or concerns relating to any human rights breaches without delay using one of the reporting channels available. You can find full details of these at the end of this document.

Our responsibilities to respect human rights are championed at the highest level in the organisation, starting with the Chief Executive and the Board. Accountability for human rights and associated policies sits with our Chief People Officer.



INDIGENOUS PEOPLES AND USE OF RESOURCES

Our operations should not hinder indigenous peoples from exercising their traditional rights.

Indigenous peoples have the right to be informed and thereafter asked for their consent in decisions that may affect them. We are cautious not to increase demand for resources that are crucial for local communities' livelihoods or the survival of indigenous peoples. We respect the rights and interests to lands and waters of community and indigenous peoples who traditionally own or use land where our facilities are to be located.



FREEDOM OF ASSOCIATION

We respect our employees' right to choose to join, or not join, a trade union, or to have recognised employee representation in accordance with local law.

While we believe that direct dialogue with employees is an effective way to develop an engaged workforce, we recognise and respect the rights of employees to associate freely and bargain collectively and are committed to fostering open and inclusive workplaces based on recognised workplace human rights. Employees' representatives are not discriminated against and have the ability to carry out their representative duties in the workplace.

Preventing the Exploitation of Others



MODERN SLAVERY

Modern slavery can take many forms, such as forced and compulsory labour, servitude, slavery and trafficking. We are aware that human traffickers and illegal/unlicensed gang-masters target a range of industries including those involved in the agricultural sector.

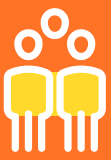
We fully endorse the Modern Slavery Act and will not accept non-compliance with the Act within our operations or those of our partners or suppliers. Our commitment is reflected through the ongoing implementation of procedures and controls and we are prepared to terminate the relationship with any supplier or partner to our operations, where they do not comply with the UK Modern Slavery Act 2015. In addition, the Group may seek to engage and work with these suppliers to ensure compliance.



NO CHILD OR FORCED LABOUR

All employment with Origin is voluntary. We do not use forced or child labour, in any operations connected with the Group and we respect all laws establishing a minimum age for employment.

In our Supplier Code of Conduct, we seek those who do business with the Group to uphold the rights of employees and expressly forbid the use of child labour, or forced or involuntary labour of any type.



WAGE AND HOURS PRACTICES

We are committed to paying employees fairly for the work they perform, regardless of personal beliefs or any individual characteristics. All compensation shall meet requirements of national minimum wage and we abide by all international and national laws regarding pay and hours practices.

WORKING HOURS

Origin supports the need to ensure that all employees work in a manner that promotes health and wellbeing, with particular regard to the importance of taking sufficient rest breaks in between periods of work. We shall comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays.

Origin will comply with the following minimum standards across its Group:

- > **The normal hours worked per day will not exceed the limit defined by local and/or national laws and shall not exceed an average of 48 hours per week unless permitted under local or national law;**
- > **Employees shall have an uninterrupted weekly rest of, or equivalent to, 24 consecutive hours in each period of 7 days;**
- > **Employees will be permitted to take paid or unpaid breaks during the working day in accordance with local laws; and**
- > **Employees will be granted paid annual leave in accordance with local law and which exceeds the minimum required under ILO conventions.**

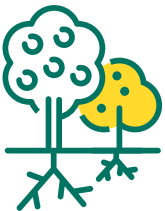
Where employees are required to undertake night work, we will comply with all relevant local and national requirements (and where relevant collective agreements) in relation to hours of work, working time and pay, and will take all reasonable steps to protect employees' health and wellbeing. In all cases, where local and national law is insufficient, we will have regard to international labour standards when setting hours of work.



OUR COMMITMENT TO COMMUNITIES & PARTNERSHIPS

One of our core values is Community. We contribute to the success of the communities where we operate and are dedicated to adding value to lifelong relationships.

It is important to us that we support local communities, recruit locally, work with and support local educational institutions, and we take pride in our active involvement with local community and social initiatives.



ENVIRONMENTAL RESPONSIBILITY

We are committed to playing a leading role in shaping a future that safeguards the environment, enhances food production systems, promotes green spaces and contributes to economic growth. With the universal impact of climate change, we have a duty to protect our planet through responsible stewardship and the sustainable and efficient use of natural resources.

We will do this by reducing our environmental footprint, implementing proven best practices, investing in scientific research, and cultivating innovative solutions which support responsible and biodiverse activities throughout our value chain.



COMMUNITY RELATIONS

One of our core values is community. We aim to contribute to the success of the communities where we operate, combining our global capability and local expertise.

We are committed to making a positive contribution in the societies and communities in which we operate. As a people-centric business, we recognise the need to build strong relations and create economic and social benefits in local communities for the long term. Our Group-wide approach to social responsibility and community action is to support causes aligned to our Vision, Purpose and Values. We encourage active participation by our companies and employees in initiatives that support local communities, through social, educational and charitable activities.



OUR COMMITMENT TO INTEGRITY

We are committed to doing the right thing.

Origin complies with all applicable laws, national and international codes and conventions. At Origin we maintain the highest standards of honesty, fairness and integrity.



UNDERSTANDING AND MANAGING OUR RISKS

We have a Group-wide Risk Management Framework and a formal risk assessment process in place through which risks are identified and mitigating controls are evaluated. The Risk Management Framework and the formal risk assessment process help to reduce the possibility of the Group failing to achieve its strategic objectives.

We have an independent Internal Audit function under the direction of the Audit and Risk Committee. Internal Audit undertakes both regular and ad hoc reviews of business processes, procedures and their related risks and controls.



ANTI-BRIBERY AND CORRUPTION

We are committed to conducting our business in an open, honest and ethical manner. We operate a zero-tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited, whether committed by employees or anyone else acting on the Company's behalf.

Never in any circumstance, on behalf of yourself, Origin or any third party should you:

- > Offer, promise or give bribes.
- > Request, agree to or accept bribes.
- > Facilitate the giving of bribes.

You must be vigilant to anything you think may be a bribe and report this to your line manager, local HR, Compliance or Legal teams immediately or use our confidential whistleblowing service.



INTEGRITY



OFFERING AND ACCEPTING GIFTS, SERVICES AND ENTERTAINMENT

The exchange of entertainment, hospitality and gifts is often a normal part of the development of business relationships and in many places, is a cultural practice. As well as having to meet standards applied by law, any entertainment, hospitality and gifts should never be unduly lavish or extravagant, influence (or be seen to influence) business decisions and/or place Origin under any obligation. They must be infrequent, of an appropriate type and value depending on the circumstances and, taking into account the reason for the gift, they must be proportionate to the development of a transparent and honest business relationship. Stricter rules can apply when making gifts to public officials – please check in advance with your Anti-Bribery Officer if you have any doubts about the appropriateness of offering any benefits to public officials.

The giving or receiving of any entertainment, hospitality or gift that could be seen as improperly influencing the receiver, creating an expectation or obligation in respect of any aspect of a business relationship, or that could otherwise create a conflict of interest, is not permitted in any circumstance and should be reported internally.

You must declare and keep a record of all hospitality and gifts given, received and/or offered in line with our Anti-Bribery and Corruption Policy.



CONFLICT OF INTEREST

All employees are required to maintain high ethical standards in handling conflicts of interests.

Business transactions must always be conducted at arm's length terms, with the best interests of Origin in mind. Employees are not to exploit any business opportunity that conflicts with the interests of Origin. Every employee is responsible for ensuring that their outside professional commitments and personal interests are not to the detriment of the Company.



COMPETITION LAW

Competition laws prohibit certain agreements, arrangements and behaviour among competitors on matters such as pricing, terms of sale and allocating market share.

The trust of our customers and suppliers can be maintained by developing and providing high-quality products and services in a fair, ethical and legal manner. We require all business practices to fully comply with applicable competition law wherever business is conducted. We expect our employees to comply fully with competition law. Origin employees should only engage in dialogue with our competitors when there is a legitimate and lawful business reason to do so. Competition laws can be complex – if you have any questions, you can contact your local Legal representative.



ANTI-FRAUD

We are committed to maintaining the trust and confidence of all our stakeholders and will take appropriate action against any person that is involved in, or assists with, committing fraud, and will actively seek appropriate recourse against all parties involved in fraudulent activity.

Employees are expected to be familiar with what constitutes fraud and what is expected of them in relation to the prevention and reporting of fraud. We maintain an independent and confidential hotline and whistleblowing channel that allows employees and third parties to report fraudulent behaviours. You can find full details of these at the end of this document, as well as in the Group Whistleblowing Policy.



INTEGRITY



ANTI-MONEY LAUNDERING

Money laundering is a way of making money received from illegal activity appear as if it has been generated by legitimate activity, usually by completing a series of transactions that have the aim of hiding the true source of the money involved. Origin employees should exercise good judgement when dealing with unusual customer transactions and report any suspicion of money laundering to a manager.



FINANCIAL INTEGRITY AND RESPONSIBILITY

Financial integrity and responsibility is at the core of all of Origin's financial reporting. We pride ourselves on the high standards we set for all of our external reporting, including compliance with all applicable financial reporting standards, legal requirements, corporate governance codes and other tax and regulatory requirements. It is the Group's responsibility to ensure that our reporting is accurate, fairly presented and transparent and we have appropriate policies, procedures and guidance in place to ensure that these responsibilities are met.



INSIDE INFORMATION AND SHARE DEALING

As a publicly traded Company, we are required to always comply with the rules that govern our stock exchange listings. You may on occasion have access to information that hasn't been made public, relates to Origin and which, if it was made public, would be likely to have a significant effect on our share price. This is "inside information" about Origin. Check with the Company Secretary straight away if you become aware of a situation like this and get prior approval before sharing this information, even with other employees. Never use inside information for personal gain or to make a decision (or help others make a decision) to buy or sell our shares – it is against the law, which can result in very serious consequences for individuals and for Origin.



WORKING WITH SUPPLIERS

Across all our businesses, we seek to source goods and services responsibly, sustainably and ethically. We choose to work with suppliers who are aligned with our core values and share a commitment to follow the highest ethical standards in conducting business. We acknowledge that every employee deserves the right to live and work with dignity and respect, in decent and safe conditions and earn fair rates of pay. We have a responsibility to ensure good social and ethical practices within our own operations and have this reflected in our supply chain.



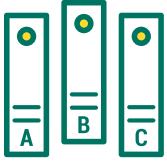
EMPLOYEE DATA PROTECTION

Origin respects the privacy of its employees by protecting sensitive and private information and complying with relevant data protection legislation. We are committed to collecting and processing personal data in a transparent and lawful manner, which is specific and relevant for the purposes for which it was collected.

Exercise discretion when handling sensitive and private information, and always ensure that all information that you have access to or handle is processed and retained in accordance with Origin's Data Protection Policy and any applicable local business unit policies.



INTEGRITY



RECORDS MANAGEMENT AND RETENTION

In the conduct of our business, we receive and produce documents, records, information and personal data in significant quantities in a variety of mediums. These have to be stored, kept accessible and retained in accordance with various requirements, including legal and regulatory. The systems and controls we put in place to do this are also designed to ensure the confidentiality and integrity of information.

Origin's general approach is to only retain employee personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you.

We are committed to protecting information by maintaining a consistent and organised approach to storing all Company records for the appropriate amount of time, retaining legal files that should not be destroyed and securely disposing of old records to comply with the law and minimise risk of sensitive information falling into the wrong hands, in accordance with our Data Retention Policy.



CONFIDENTIAL INFORMATION

We have earned our customers' and employees' trust and work to protect that relationship.

Private information must be kept confidential, protected by appropriate controls designed to minimise loss or damage through accident, negligence or deliberate actions.

We expect all employees to treat all information that is not publicly available as being confidential, not disclose it to anyone and not use that information except for the purposes for which it was provided.

Your duty to protect the Company's confidential information continues even after you leave the Company, and you should return all proprietary information in your possession upon leaving the Company and not keep or distribute any copies.



We are committed to doing the right thing.

At Origin we maintain the highest standards of honesty, fairness and integrity.



OUR COMMITMENT TO INNOVATION



INTELLECTUAL PROPERTY

Origin's intellectual property is a valuable Company asset – it contributes to our growth, competitive position and R&D innovations, and has both financial and strategic value. We expect everyone in Origin to support in safeguarding and protecting the intellectual property that is developed and owned by Origin. Intellectual property includes logos, Company or product branding, trademarks, patents, designs, domain names and copyright. Always co-operate in the establishment, protection, maintenance and defence of Origin's intellectual property rights.

Origin is also committed to respecting the intellectual property of third parties. Unauthorised use of intellectual property can expose both the Company and individuals to fines, penalties and reputational harm. Always respect the intellectual property rights of others by using them only with their consent and never unlawfully taking or using them.



INFORMATION TECHNOLOGIES AND ELECTRONIC COMMUNICATIONS

Our Information Security Policy sets out how we aim to protect our information, our business and ourselves from a wide range of threats in order to ensure business continuity, maintain privacy and to minimise business risk. Such essential measures enable us to define, achieve, maintain and improve our information security, which allows us to realise our business objectives, maintain our reputation and ensure legal compliance.

As a multinational organisation, we rely on information technologies and electronic communications to conduct business.

Personal use of technology should be kept to a minimum, with employees using computer resources for business purposes primarily. Personal use of email and internet access must be limited in use, comply with our policies and must not adversely impact productivity or system capacity. Computer resources must not be used for any purpose, or in any manner that is not lawful.



SOCIAL MEDIA

Social media provides individuals with an opportunity to interact and engage with friends, families, companies, clubs, and other communities in a positive and effective way. While providing many benefits the use of social media services and networks can also result in negative outcomes for both an individual and in some cases, can damage the reputation of the Company.

We are an innovative Company and we recognise the importance of participating in these online conversations. We're committed to ensuring that we participate in social media the right way and in accordance with our Social Media Policy.



MEDIA AND PRESS COMMUNICATIONS

Employees should direct members of the media to their appropriate local team responsible for issuing media releases and interacting with members of the media. If unsure they can speak to a member of management.



YOUR COMMITMENT

Everyone who works for or with an Origin Group Company in any capacity, no matter what they do or where they work, is required to take personal responsibility for reading, understanding and complying fully with our Code of Conduct, policies and our procedures, as well as our legal and regulatory obligations.

An important part of meeting your commitment is to seek guidance regarding any business decision you are uncertain about or whenever you feel guidance is needed. Speak with your manager in the first instance or contact your Compliance, Human Resources or Legal team, either locally or at a corporate level, depending on the nature of your issue.

Any failure to comply with applicable legal and regulatory obligations, unethical conduct or a failure to comply with or properly implement our Code of Conduct, policies and procedures, including a failure to detect or correct issues, may be subject to disciplinary action.

We want Origin to be the best place to work for all employees and we pride ourselves on being a team people can trust.

SEE SOMETHING, SAY SOMETHING

We want Origin to be the best place to work for all employees and we pride ourselves on being an organisation that people can trust. At Origin, we are responsible for preventing and eliminating wrongdoing within our organisation and we want to encourage you to help us in that effort. We expect everyone working in Origin to respect our values and maintain the highest ethical standards. In return, it is important to us that you feel comfortable in raising concerns with us so that we can appropriately address them. We want you to be safe in the knowledge that we will take any genuine concerns you raise seriously and ensure you do not suffer any victimisation or detriment as a result of raising such concerns.

To do this, we continuously review new ways to improve how we operate to promote a high level of integrity throughout our business, ensure we are aligned to corporate best practice and apply the highest corporate governance standards.

To support these objectives, we have a whistleblowing system available to all those working in the business. To assist with the identification of possible wrongdoing within the organisation we have drafted a comprehensive **Origin Group Whistleblowing Policy**, available from your local HR team/the Chief People Officer.

If you think that you may have a concern that falls under this policy, you should report this in the way set out in the local addendum to the Origin Group Whistleblowing Policy: these people have been appropriately trained to perform their functions and will make sure your concern is dealt with appropriately.

We set out below some examples of potential activities that we would expect you to speak up about. This is by no means a full list but examples may include information about:

- **Endangering someone's health and safety**
- **Anything that is against the law (other than issues which may exclusively affect the reporting person and which are covered by other Origin policies, e.g. a grievance policy)**
- **Stealing or fraud**
- **Corrupt or dishonest activity (including bribery and facilitating tax evasion)**
- **Damage to the environment**
- **Financial mismanagement**
- **Covering up wrongdoing**
- **Abuse of authority**
- **Intentionally misreporting to a regulatory body**
- **Any attempts to conceal or destroy information relating to the foregoing**

Sometimes matters that you raise may be covered by other Origin policies. If you are in doubt as to whether a matter is covered by other Origin policies, you can contact your local HR team who will assist you in identifying the appropriate channel to raise your concerns. Alternatively, the person who you contact may direct you to the appropriate channel on receipt of your report.

HOW TO REPORT AN ISSUE

WHO CAN YOU CONTACT?

A culture of transparency and integrity is extremely important for Origin. We have a number of channels through which concerns can be raised. Employees are encouraged to report their concerns as soon as possible using one of the following channels of communication:

IF YOUR CONCERN IS NOT A WHISTLEBLOWING CONCERN:

TELL PEOPLE AT LOCAL LEVEL:

Your line manager will usually be the person best able to resolve the issue or escalate it in the most effective way and so, if possible, you should tell them first. Tell them in person, or in writing if you prefer.

If you do not wish to tell your line manager, you can contact any other local manager who you feel comfortable talking to. Your local HR, Health & Safety or Compliance team will be able to support you with any concerns you may have.

Please note: If your concern is a whistleblowing concern, managers or local teams may redirect the concern without delay in accordance with the channels identified in the whistleblowing policy.

TELL PEOPLE AT GROUP LEVEL:

The Chief People Officer and the General Counsel & Company Secretary will be able to support you with any concerns you may have.

Please note: If your concern is a whistleblowing concern, the Chief People Officer and the General Counsel & Company Secretary may redirect the concern without delay in accordance with the channels identified in the whistleblowing policy.

IF YOUR CONCERN IS A WHISTLEBLOWING CONCERN, TELL YOUR LOCAL AUTHORISED RECIPIENTS:

These people can be found in the local addendum to the Origin Whistleblowing Policy. If you are not sure where to find the local addendum, you can contact your local HR team/the Chief People Officer or, if the concern is related to these persons, your local CEO.

IN ALL CASES, YOU HAVE THE OPTION TO USE THE CONFIDENTIAL REPORTING SYSTEMS:

You can call our confidential reporting hotline, Navex, to report something if you wish to do so. This is a free, 24-hours a day, multilingual, independent confidential hotline that will allow you to raise a concern at any time. Their full details are listed below as well as in the Group Whistleblowing Policy.

Information shared via this external provider is subsequently shared with an appropriate person in Origin at group level, to allow the information to be followed up via internal channels. If you have concerns with your report being shared with any particular persons in Origin, please state this in your initial report so that Origin can take this into consideration when responding to your concern.

How to report concerns using the Company's confidential telephone or web reporting systems, detailed below by Country:

Country:	Telephone Number:
Ireland	Telephone: 1800 851 277 or via the website originenterprises.ethicspoint.com
United Kingdom	Telephone: 0800 949 6390 or via the website originenterprises.ethicspoint.com
Romania	Telephone: 0800 890 351 or via the website originenterprises.ethicspoint.com
Poland	Telephone: 800 005 065 or via the website originenterprises.ethicspoint.com
Brazil	Telephone: 0800 729 2292 or via the website originenterprises.ethicspoint.com

How to report concerns using your mobile phone:

You can also access the confidential reporting hotline with your mobile phone, and the line is available 24 hours a day, 7 days a week. Please use the following link or scan the QR code below:

<https://originenterprises.navexone.eu/>

