



## BURGESS FARMS

CODE OF CONDUCT POLICY AND PROCEDURE			
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<b>For use by:</b>	All employees of Burgess Farms and its subsidiary Companies		
<b>Purpose:</b>	Burgess Farms strives to maintain a work environment for its employees in which honesty, integrity and respect is constantly reflected in personal behavior and standards of conduct.		
<b>This document supports:</b> <i>Standards and legislation</i>	Bribery Act 2010 General Data Protection Regulations (2018)		
<b>Key related documents:</b>	BFHRPO25 Absence Management Policy and Procedure BFHRPO11 Whistle Blowing Policy and Procedure 09 13 BFHRPO03 Anti-bribery Policy and Procedure 05 14 BFHRPO12 Dignity at Work Policy BFHRPO14 Disciplinary Policy and Procedure BFHRPO22 Grievance and Dispute Policy and Procedure		
<b>Review date:</b>	Changes to legislation / Changes to Company policy		



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## Definitions

“**Company**” means Burgess Farms

“**Subsidiary Companies**” means all Companies owned by Burgess Farms

### 1. Policy Statement

Our values are what our employees and our business are about – they are what our Company stands for, what we believe in, and what we are. They underpin the decisions, actions and behavior of everyone who works for Burgess Farms and its Subsidiary Companies.

The success and reputation of the Company depends on everyone. Together we can keep and grow our reputation by behaving professionally, honestly and with integrity towards each other and our customers and suppliers.

### 2. Key Principles

The Company expects the highest ethical standards from its employees in carrying out its business. This Code of Conduct (the Code) sets out those standards by which all employees are bound. It provides guidelines on the required behavior in a wide range of situations, including social events and out of hours activities that directly reflect on the Company as well as themselves.

It is the responsibility of all employees to familiarize themselves with the details of the Code and its guidance. If any employee has any queries or concern about how they should behave, they should contact their line manager of the Human Resources (HR) Department.

The Code describes the principles by which the Company expects its employees to conduct its business. It sets out the required standards of behavior for its staff in carrying out this business. The Code deals with a wide variety of issues and situations relating to workplace conduct, but it is not intended to be exhaustive.

This Code of Conduct sets out principles by which the Company is bound. These principles are as follows.

- We comply with laws and regulations.

- We reject bribery and corruption and avoid being compromised by gifts and entertainment.
- We avoid conflicts of interest.
- We respect the confidentiality of personal and corporate information.
- We promote diversity and equality and treat people fairly and with respect.
- We maintain a safe and healthy environment for people to work in and are proactive in managing our responsibilities to the environment.
- We support those who have any suspicions of any misconduct, malpractice, illegal or unethical behavior and report their concerns in confidence to the appropriate channels.

These principles are outlined in more detail in the Code below. Several of the principles and standards outlined in the Code are supported by more detailed specific policies within the Company as identified

### **3. Scope**

This policy applies to all employees, temporary employees, agency workers and contractors employed by the Company and its subsidiary companies. It is not a contractual document and can be amended or revoked at any time by the Company with or without notice.

## **4. Code of Conduct**

### **4.1 Complying with the Law**

The Company's business and employees (and all others to whom this Code applies) must observe UK laws and regulations.

Employees who raise concerns about whether conduct complies with the law and with the Code should immediately bring it to the attention of their manager. It is the Company's policy that staff who raise concerns in good faith shall not suffer any kind of punishment or retaliation. Please also refer to the Company's Whistleblowing Policy.

### **4.2 Bribery and Corruption**

The Company does not permit, in accordance with the provisions of the Bribery Act 2010, the bribery of any person involved in its business. Employees must not authorize, offer, promise or pay or receive a bribe designed to secure an unlawful advantage. The amount of the bribe is irrelevant.

In some circumstances, excessive hospitality or gifts may be regarded as offering or receiving bribe. An employee should always check with their line manager if in doubt. Please also refer to the Company's Anti-Bribery Policy.

### **4.3 Fraud**

Fraud is not tolerated in the Company.

Any attempt to secure an unlawful gain will lead to disciplinary action and sanctions up to and including dismissal. Where appropriate, the Company may be obliged to submit a report to the relevant authority which could lead to prosecution.

The Company will always seek to recover loss resulting from fraud.

### **4.4 Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure**

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure to be used for business relationships and improving the image and reputation of the Company. However, an employee should not offer or accept any gifts or hospitality that would gain any commercial advantage as this would be classed as a bribe. Please refer to the Company's Anti-Bribery Policy.

### **4.5. Conflict of Interests**

It is important that, where decisions are made which have a significant effect on the Company and others, they are taken in a fair and balanced way. Any potential conflicts of interest must be declared so that individuals are not involved in decisions that could be regarded as biased.

### **4.6. Equality, Diversity and Inclusion**

The Company is committed in the promotion of inclusivity and diversity. It seeks to ensure that the workplace is supportive of its staff and one where individual respect is shown to all members of staff, regardless of age, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex or any other factor. All staff will be supported and encouraged to perform to their potential. For further information, employees should refer to the Equal Opportunities policy

### **4.7. Dignity at Work**

The Company has zero tolerance to bullying and harassment.

Any inappropriate behavior that shows lack of respect for others, or causes people to feel threatened will be investigated and appropriate action taken

For further information, employees should refer to the Dignity at Work policy

### **4.8. Conduct outside Work**

As a general rule, what employees do after working hours and away from the premises is a personal matter. However, the Company will investigate any alleged incidents where they fall into the following circumstances.

- Office parties, drinks events and other work-related social occasions.

- At third-party (that is, clients and customers) occasions where the employee has been invited in their capacity as an employee and representative of the Company.
- At work-related conferences and training courses.
- Where the employee is away on business on behalf of the Company.

The Company's policies will continue to apply at all these events. An employee should not bring or attempt to bring the Company's name into disrepute. Improper behavior will lead to investigation and possible disciplinary action, including dismissal and in cases of gross misconduct, a summary dismissal.

#### **4.9. Sexual Harassment**

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (eg WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour.

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace. Allegations of sexual harassment and victimisation will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our disciplinary procedures, a copy of which is available from Human Resources.

#### **4.10 Relationships with other Members of Staff and Clients and Customers**

The Company does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation.

Members of staff who are relatives or who have a close personal relationship should not normally have a supervisory, assessing or authorizing relationship with each other. Each case will be addressed on own merit taking into account any Corporate Governance protocols in place

Employees must inform their line manager if they have a close personal relationship with another employee or a client or customer which could be considered by colleagues or other, as impacting on the way they conduct themselves at work.

#### **4.11 Health and safety**

The Company places a high priority on providing a safe workplace and minimizing the risks identified by the Health and Safety at Work Act 1974 and associated legislation.

Effective safety management requires the active involvement of every employee and every employee has a legal duty to look after their own health, safety and welfare and that of those around them.

Employees should refer to the Company's Health and Safety policy for further information.

#### **4.12 Environment**

The Company is committed to preventing, or, at the very least, minimizing, any harmful effects it causes to the natural environment. It encourages all employees to conduct their work in accordance with the highest environmental practices and the minimizing of waste. Refer also to the Company's Environmental Policy

#### **4.13. Additional/Alternative Work**

An employee must have permission to work for another employer in addition to their Burgess Farms employment. This is to safeguard an employee's health and safety and ensure the business complies with the Working Time Regulations.

#### **4.14. Appearance**

An employee should dress appropriately to their role, so the business can portray a professional image. If clothing is provided, an employee is expected to keep it clean and tidy. Specific work wear or PPE is mandatory in certain areas of the business.

#### **4.15 Attending Work**

The Company expects every employee to start and finish in line with their agreed hours. Persistent lateness and unauthorized absence are taken seriously and may lead to disciplinary action.

#### **4.16 Betting, Fund-Raising and Personal Sale of Equipment**

Permission should be obtained by an employee's line manager although more senior approval may also be required if an employee wishes to partake in betting, fund-raising or sale of personal equipment whilst at work.

#### **4.17 Confidentiality**

An employee should not; either during employment or after, share with anyone not employed by the Company any company information, except where it is expected as part of their job. Any communication with the press and media should be approved through the Group Marketing and Insight Department or the Company's PR Agency.

Equally, employees should not share any confidential information with anyone else in the

company who is not entitled to know about it.

#### **4.18 Criminal convictions**

Failure to disclose a criminal conviction, unless it has been spent as described under the Rehabilitation of Offenders Act 1974, may lead to employment being terminated.

If an employee is subject to any criminal proceedings whilst in employment (this includes road traffic offences), they must notify the HR department or their line manager immediately as they will need to consider whether the situation deems the employee unsuitable to continue in their present role.

#### **4.19 Data Protection**

The Company will ensure that personal data is handled in accordance with its Data Protection Policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of personal data will constitute a data breach and should be reported immediately to the Company's Data Protection Champion in accordance with the Company's Data Protection Policy. Reported data breaches will be investigated and may lead to sanctions under the Company's Disciplinary Procedure.

#### **4.20 Misuse of drugs and alcohol**

Consumption of alcohol or bringing on to site, illegal drugs or other substances (unless medically prescribed) is strictly forbidden. If an employee is suspected to be under the influence of alcohol or non-medically prescribed illegal drugs or substances whilst at work, they will be suspended immediately and will be subject to disciplinary action as per the Company's Alcohol and Drugs Policy.

#### **4.21 Personal Calls**

Personal calls are permitted as long they are kept to a minimum and, where possible, in break times. A personal mobile phone should be used for personal calls. Mobile telephones or any other electronic device are not allowed within our production areas.

#### **4.22 Smoking**

Smoking is not permitted on any Company vehicle and on any of the Company's sites, except in the designated areas. This includes tobacco and electronic cigarettes alike.

#### **4.23 Social media**

Access to social media sites e.g. Facebook, Twitter, YouTube etc., from a work computer or device is not allowed at any time. Whilst the Company understands that an employee may wish to use their own computer or device to access social media sites in their own time, reference to, or discussion about the Company or employees in any capacity unless agreed by a manager for professional reasons is prohibited. Please also refer to the Company's IT policies.

#### **4.24 Use of IT equipment, Email and Internet**

Users of the Company's IT equipment and internet facilities must behave reasonably towards other users and the facilities, please refer to the IT Usage Policy for further information.

#### **4.25 Whistle Blowing**

The Company is committed to the highest standards of openness and accountability.

The Company expects colleagues, and others we deal with, who have serious concerns about any aspect of the Company's work to come forward and voice those concerns.

For further information, please refer to the Company's Whistle Blowing Policy.

### **5. Breach of Policy**

The Code of Conduct policy has been drawn up to provide a source of guidance to the Company's and the Subsidiary Company's employees.

Any breach of the Code of Conduct Policy, following a full and thorough investigation, may be regarded as misconduct which may lead to disciplinary action.

### **6. Confidentiality**

Where any information is given by the employee or about the employee, their right to absolute confidentiality on all personal matters will be guaranteed by all parties.

Access to this information will be restricted to the business where appropriate and for business statistical purposes unless otherwise mandated by law.

### **7. Complaints**

Any employee who is dissatisfied with the application of this policy may raise their concerns in writing to their first Line Manager who will address their concerns with HR.

If this happens, the Chairperson will consider whether to suspend the disciplinary procedure for a short period whilst the complaint is dealt with or to deal with the complaint and disciplinary matter concurrently.

## 8. Document Control

<b>Versio n</b>	<b>Revisio n</b>	<b>Action</b>	<b>Auth or</b>	<b>Date</b>
001	0.1	Section 5 Breach of policy – amended paragraph to ensure all of the Company’s ‘Breach of Policy’ wording is consistent	MK	22/12/2014
001	0.2	Appendix added – Corporate Governance Document	AS	24/04/2020
001	0.3	Added 4.9 – Sexual Harassment	SA	31/10/2024
001	0.4	Added correct document control reference and amended format	SA	27/11/2025
001	0.5	Updated format	GT	18/02/2026