



OPENGATE
DISTRIBUTIONS GROUP

Supplier Code of Practice

JANUARY 2025

Introduction

At OpenGate Distributions Group Ltd, we aim to develop successful long-term relationships with all our suppliers.

We will work with you constantly to ensure that your products are brought to market in the most effective manner possible and that buyers of your products receive a high standard of support.

We want to build this relationship on a sustainable basis – one that works for you and works for us in the long-term. So, it's important that while everything we do is commercially-focused, it is also ethical and legal. Taking this approach protects your business and reputation as much as our own. We are committed to this approach in every area of our business.

To help us to achieve this, we have developed this Code of Practice setting out the key ethical and legal standards that apply to the business we do together. Please ensure that you take suitable steps to meet the standards set out in this Code, including by communicating this Code to the relevant people within your business.

By each of us following the standards in this Code, we will develop a business relationship that is sustainable in the long-term. Any person who is dealing with us, at any level of seniority, should feel free to raise concerns about whether these standards are being met by OpenGate Distributions Group Ltd.

If you have a concern, we want to know about it. To the extent we lawfully can, we will treat all notifications in confidence. Please contact us directly or use our dedicated email address: hello@opengate-distributions.co.uk.

Expected Standards

1. Health & Safety

- Suppliers must comply with all applicable health and safety laws and provide a safe and healthy workplace for all employees.
- Regular and recorded health and safety training must be provided.
- Emergencies impacting OpenGate Distributions Group Ltd must be promptly reported.

2. Employment

- Suppliers must comply with international human rights standards and ensure employees are treated fairly and paid appropriately.
- Discrimination, forced labor, and child labor are strictly prohibited.

3. Environmental Protection

- Suppliers must comply with environmental regulations, ensure sustainable use of natural resources, and minimise carbon emissions.

4. Bribery & Corruption

- Suppliers must ensure no involvement in bribery or corrupt practices, and any gifts or hospitality must comply with legal and ethical guidelines.

5. Confidential Information

- Confidential information must not be shared or misused. Any breaches should be reported immediately.

6. Data Protection & Privacy

- Suppliers must handle personal information securely and in compliance with data protection laws.

7. Competition Laws

- Suppliers must comply with all applicable competition (anti-trust) laws and ensure independence in pricing and business decisions.

8. Tax Compliance

- Suppliers must declare all income and comply with tax laws. Transparency with tax authorities is essential.

9. Intellectual Property

- Suppliers must ensure all products and services respect the intellectual property rights of third parties.

10. Product Safety & Quality

- Suppliers must ensure products are safe, meet standards, and include legally required information.

11. Export Controls & Sanctions

- Suppliers must comply with export controls, sanctions, and embargoes laws, ensuring proper documentation.

12. Conflict Minerals

- Suppliers must ensure products are free from conflict minerals as per US and EU regulations.

13. Managing Compliance

- Suppliers must maintain records of compliance and ensure leadership promotes ethical business practices.

We will take suitable steps if a supplier does not follow the standards set out in this Code of Practice, which may include the termination of our agreement.