

Local Bounti Corporation

Supplier Code of Conduct (adopted and approved on December 19, 2022)

Purpose

Local Bounti Corporation (collectively with its subsidiaries, “*Local Bounti*,” “*we*,” “*our*,” or “*us*”) is committed to promoting high standards of honest and ethical business conduct and compliance with applicable laws, rules, and regulations.

We are starting a new chapter in agriculture, building a business with sustainability at its core. Local Bounti’s focus on LOCAL is core to our desire to transform our local communities, the agriculture workforce, and our environment.

We hold our suppliers to the same high standards we set for ourselves. When the practices of this Code are upheld throughout the entire supply chain, we build and strengthen trust with each other, our customers, and the local communities we serve.

Covered Suppliers

This Supplier Code of Conduct (this “*Code*”) applies to suppliers of Local Bounti. Suppliers include anyone that provides products or services to Local Bounti, including goods for resale and goods and services for our own use. A signed supplier agreement, acceptance of a purchase order, or provision of goods or services to Local Bounti constitutes acceptance of this Code and serves as the supplier’s continuing affirmation of compliance. In addition, Local Bounti may enter into contracts with certain other parties that require those parties to comply with this Code. In this Code, we refer to anyone covered by the Code as a “supplier.” Our suppliers often operate their own robust ethics and compliance programs. Nevertheless, Local Bounti has strong values, and we hold each of our suppliers to the same high standards.

Suppliers are responsible for compliance with this Code throughout their business and throughout the process of providing products and services to Local Bounti. This includes responsibility for the conduct of any suppliers, subcontractors, and agents they use as part of their Local Bounti business.

Anyone who violates this Code may be subject to consequences, up to and including termination of business with Local Bounti. Local Bounti reserves the right to audit or inspect suppliers at any time to determine whether they are complying with this Code.

Reporting

If you see or hear about something suspicious, we ask that you report it right away. This includes any potential violation of this Code, as well as instances where you believe a Local Bounti employee or representative might be acting contrary to our values.

Reports under this Code should be made in accordance with Local Bounti’s Whistleblower and Complaint Policy, which is available on Local Bounti’s website. Reports can be made





anonymously using Local Bounti's whistleblower hotline, as described in the Whistleblower and Complaint Policy.

The following instances should be reported immediately when related to a supplier's business with Local Bounti:

- Bribery
- Forced labor, prison labor, trafficked labor, and underage labor
- Violence against or harassment of workers
- Sanctions violations
- Government investigations or enforcement activities
- Breach of confidentiality obligations

Conditions posing an imminent risk to the health and safety of workers and incidents involving loss of life, significant disruption to operations, significant injury, and significant loss of property should also be reported to the appropriate governmental authority in accordance with local requirements.

Compliance with Laws and Policies

Local Bounti is committed to complying with applicable laws, rules, and regulations. We expect our suppliers to do the same, including the following:

- Conduct your business ethically and with integrity. Don't do anything that would put Local Bounti at risk of violating the law, might harm Local Bounti's reputation, or could be perceived as misleading, defrauding, or exerting undue influence on Local Bounti.
- Understand and comply with all relevant laws. Even if the conduct is legal in the location in which it takes place, it is prohibited if it would create a legal violation in the country into which goods or services are delivered.
- Comply with all applicable Local Bounti contracts, policies, procedures, and requirements. Local Bounti makes requirements and resources available from time to time. It is your responsibility to stay up to date on all applicable requirements. If this Code or a Local Bounti policy requires more than what the law requires, you must follow Local Bounti's requirements.
- Obtain the licenses, permits, certifications, registrations, and rights necessary to operate and to provide products and services to Local Bounti. Maintain these items and comply with all conditions of issue.
- Remediate issues where they exist and bring your operations into compliance if they are not.

Understand and Manage Risk

Effective risk management is key to complying with the law and Local Bounti's expectations. As a supplier, you should actively manage risk related to your business with Local Bounti by taking the following actions:

- Understanding and assessing risks relating to your industry, products, and workforce. Research and stay up to date on the laws, regulations, standards, industry best practices, conditions of sale, and scientific developments.
- Adopting strong operations, safety, and quality management systems. This includes obtaining and maintaining a certification from a Global Food Safety Initiative (GFSI) recognized food safety certification program.



- Training your employees, suppliers, and subcontractors.
- Knowing your suppliers and subcontractors and monitoring their performance.
- Putting procedures in place to monitor your compliance with laws, policies, and this Code.
- Assigning clear responsibility and accountability for compliance within your organization.

Operate Safe Workplaces

Local Bounti expects suppliers to take responsibility for the safety and wellbeing of the workers who provide products and services to Local Bounti, including the following:

- Provide a safe, clean, and healthy work environment as appropriate for your industry, geography, and workforce. This includes ensuring facilities are structurally sound, fit for purpose, compliant with electrical and fire safety laws and standards, and well maintained.
- Provide access to clean and sanitary facilities and clean drinking water.
- Implement appropriate procedures and safeguards to prevent accidents and injuries to workers. Establish proper maintenance, monitoring, and inspection routines, worker training and protection, and fire safety measures. Take appropriate steps to protect workers from exposure to harmful chemicals, infectious disease, and other similar risks. Observe restrictions on hazardous work for young workers.

Uphold High Standards for Safety and Quality

Local Bounti earns customer trust by providing safe, high-quality products our customers love. We expect our suppliers to help us maintain trust with the following standards:

- Providing us with products that meet all legal, industry, and Local Bounti safety, quality, and technical requirements.
- Implementing appropriate risk management systems to protect against food and product safety hazards. Suppliers should have these systems independently validated and verified.
- Monitoring products you produce for safety and quality and promptly reporting material issues to Local Bounti. Material issues include failing to meet recognized safety standards and defects in product labeling or instructions that increase the risk of unsafe use. In the case of food products, material issues also include product specification deviations and microbiological, chemical, or physical hazards that affect the safety of the product.
- Notifying Local Bounti of voluntary and mandatory product recalls and removals where you identify products as not meeting applicable requirements.
- Participating actively with Local Bounti and with regulatory authorities in the recall and removal of products.

Create a Respectful Workplace

Local Bounti respects the dignity of every individual and values their unique skills. Individuals should be treated fairly and respectfully without regard to their race, color, citizenship status, religious creed, national origin, ancestry, gender, sexual orientation, gender identity or gender expression, age, marital status, veteran status, pregnancy, physical or mental disability, medical condition, family and medical care leave status or any other condition prohibited by law. Discrimination, harassment, and unfair treatment diminish the dignity of individuals and have no place in Local Bounti's business or in our suppliers' businesses. Suppliers' employees and



workers in their supply chains must be able to raise concerns about discrimination, harassment, and unfair treatment freely and without fear of retaliation.

Local Bounti expects suppliers to create a respectful workplace through the following actions:

- Provide a fair, consistent, and inclusive environment and make all employment decisions based on neutral and objective criteria. Suppliers must not engage in or tolerate discrimination, harassment, and unfair treatment based on an individual's race, color, citizenship status, religious creed, national origin, ancestry, gender, sexual orientation, gender identity or gender expression, age, marital status, veteran status, pregnancy, physical or mental disability, medical condition, family and medical care leave status or any other condition prohibited by law. If there is a perceived conflict between this expectation and applicable law, let Local Bounti know.
- Provide a mechanism for workers to report concerns to management, to you as the supplier, and to third parties. These mechanisms should allow for anonymity and prohibit retaliation for reporting in good faith.
- Address reports that your management, employees, or subcontractors have engaged in harassment, threatening behavior, or discrimination.
- Do not engage in physical punishment, including when imposing discipline.

Employ and Pay People the Right Way

Companies that treat their workers fairly and comply with relevant employment laws and agreements are better suppliers. Suppliers must provide for the following:

- Provide compensation, benefits, working hours, breaks, rest days, holidays, and leave that comply with legal requirements and applicable agreements. Ensure workers understand these terms.
- Do not make illegal or excessive wage deductions, withhold wages, delay wage payments, or pay wages irregularly.
- Vendors and suppliers are expected to conform to ILO (International Labor Organization) standards.
- Comply with all applicable laws, regulations, and agreements relating to the employment of young workers.
- Recognize freedom of association and collective bargaining. Respect the rights of workers to join an employee association or trade union, or refrain from doing so, without interference, in accordance with applicable law and practice.
- Confirm all workers are appropriately authorized to work. This includes verifying workers' eligibility to work in the country and in the relevant job prior to employment.

Do Not Use Involuntary, Trafficked, or Underage Labor

People should not be exploited through employment, and Local Bounti has signed onto the International Fresh Produce Association's Ethical Charter on Responsible Labor Practices (<https://www.ethicalcharter.com/english/>), committing to responsible labor practices. We expect suppliers to take seriously their responsibility to prevent these practices, including the following:

- Do not use forced labor. Exclude involuntary labor—including underage, forced, coerced, bonded, involuntary prison, exploited, trafficked, or indentured labor—from your operations, subcontractors' operations, and supply chain.
- Be aware of indicators of involuntary labor and actively address them. Have systems in place to monitor for signs of trafficking and exploitation, particularly where your business includes vulnerable populations such as migrants, women, and young people.



- Recruit responsibly. Do not charge vulnerable workers recruitment or similar fees—even if the collection of these fees is allowed under local law. If these fees are charged, we expect you to repay them. We also expect you to communicate to migrant workers the terms of their employment contract in their native language prior to departure from their home country. Hold your agents and any labor brokers and recruiters used in the recruitment process to the same standards.
- Allow workers freedom of movement. Do not keep workers' personal identity documents or other valuable possessions, do not control workers' freedom of movement through debts owed to you, brokers, or other third parties, and allow workers to terminate employment on reasonable notice.

Protect the Environment

Local Bounti is committed to complying with environmental laws and advancing sustainability in agriculture. We collaborate with suppliers and others to inspire positive change throughout supply chains and to help reduce emissions, eliminate waste, and preserve natural resources. Local Bounti works with suppliers who share these values and encourages suppliers to develop their own sustainability goals. Local Bounti has developed a sustainability report and web resources, and suppliers should consult these resources to learn more about our sustainable sourcing goals and expectations.

In addition to complying with all relevant environmental laws and regulations, suppliers should design and operate systems to properly manage wastewater, stormwater, waste, air emissions, and recyclable materials. In addition, supplies should handle, store, transport, and dispose of chemicals and hazardous waste responsibly.

Never Engage in Bribery

We expect suppliers to support Local Bounti's compliance with applicable anticorruption laws and policies. We also expect suppliers to uphold these same values in their businesses, including the following:

- Never offer, pay, or receive a bribe.
- Do not give, offer, authorize, or promise to give money or anything else of value to any person, including any government official, to improperly influence any act or decision or to otherwise gain an improper benefit.
- Comply with relevant anticorruption laws, including the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act.
- Report to us any bribery or attempted bribery, even if unsuccessful.

Observe Trade, Sanctions, and Security Laws and Guidelines

Our high expectations of suppliers extend throughout the supply chain, including making products the right way, following all trade laws, and ensuring that products are transported safely and securely.

Suppliers are responsible for ensuring that products are not produced, in whole or in part, in violation of the law or in a way that would cause Local Bounti to violate the law. Suppliers must comply with all applicable trade, sanctions, conflict minerals, permissible harvest, and animal welfare laws and regulations, including taking the following actions:



- Establish controls to secure the supply chain from being used for improper purposes, including smuggling, terrorism, fraud, and theft.
- Formulate and label products in a way that allows them to be transported, stored, and sold without compromising the products or the supply chain.
- Where the supplier is responsible for delivering product to Local Bounti, ensure containers and conveyances used are safe, sound, clean, and appropriate for the safe and secure delivery of product to Local Bounti.
- Take steps to prevent illegal transshipment or the mislabeling of products to mask a product's country of origin.

Label and Market Products Accurately

Earning and maintaining customer trust requires being accurate and transparent about the products we sell. Local Bounti cannot do it alone—suppliers play a key role in helping our customers make informed decisions.

Suppliers will provide Local Bounti with timely and accurate information about the products you provide to Local Bounti and our partners. We rely on this information to make business, legal, and compliance decisions, among other purposes.

Our suppliers will provide only genuine products that are what they claim to be. They will comply with relevant labeling laws and regulations and be honest with Local Bounti customers. Suppliers should make sure all product labels and descriptions are clear, accurate, truthful, and not misleading. Suppliers should include all appropriate disclaimers, disclosures, and warranties and support any claims you make with adequate substantiation.

Recognize and Avoid Conflicts of Interest

We ask our employees and representatives to avoid situations where they might put personal interests or the interests of a third party ahead of Local Bounti's. Relationships with Local Bounti suppliers are a key area in which conflicts can arise.

Suppliers must avoid forming personal relationships with Local Bounti employees or representatives that would compromise or appear to compromise the independence, integrity, impartiality, or judgment of Local Bounti. Where these relationships exist, they must be disclosed to Local Bounti. Whether a personal relationship is appropriate depends on the circumstances.

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage between Local Bounti and a supplier or to facilitate approvals from government officials. Suppliers must be careful to avoid even the appearance of impropriety in giving or receiving gifts and entertainment relating to your business with Local Bounti. In general, a Local Bounti employee or representative cannot offer, provide or accept any gifts or entertainment with respect to a supplier relationship, except in a manner consistent with customary business practices, such as customary and reasonable meals and entertainment. Gifts and entertainment must not be excessive in value, in cash, susceptible of being construed as a bribe or kickback, or in violation of any laws. We expect suppliers to abide by these same standards. These standards apply to Local Bounti's transactions everywhere in the world, even if it conflicts with local custom. Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or



retain business or favorable treatment is a criminal act subject to prosecution and conviction. For additional information, please see Local Bounti's Anti-Corruption Policy. Additionally, employees and suppliers should not offer, provide, or accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions relating to their relationship with Local Bounti.

Compete Fairly

Local Bounti is committed to free and fair competition and conducts its business in compliance with antitrust and competition laws. We expect our suppliers to refrain from asking us to limit business with other companies and to refrain from offering or providing Local Bounti with competitively sensitive information related to our competitors or other third parties.

Confidential Information

Local Bounti sometimes gives suppliers access to our property and nonpublic information. Suppliers entrusted with this privilege are held to the same standards to which we hold ourselves, including the following:

- Do not share Local Bounti's confidential information with any third party, including other retailers or suppliers. Confidential information includes any nonpublic, commercially sensitive, or proprietary information, including prices or other commercial terms, product plans, private label product designs and formulas, promotional plans or strategies, market intelligence, production or sales volumes or forecasts, and trade secrets.
- Protect personal information you receive from Local Bounti or collect on our behalf by implementing safeguards for its proper collection, storage, sharing, use, and destruction.
- Comply with all applicable privacy and data use laws and policies.
- Follow all applicable guidelines regarding the use of Local Bounti's property—including Local Bounti's intellectual property and funds—and guard against misuse.
- Suppliers should submit only accurate and justified financial claims to Local Bounti.
- Suppliers will not allow Local Bounti to serve as a conduit for money laundering, terrorist financing, or fraud. Where relevant, establish and maintain controls designed to prevent these activities.
- Suppliers will not speak for Local Bounti.

Cooperate with Local Bounti

Local Bounti takes steps to ensure we are living up to our high standards and acting in a manner consistent with our values. Sometimes we may need your cooperation, including the following:

- Cooperate with Local Bounti investigations related to potential violations of law, regulation, policy, contract, or this Code. Respond to inquiries and requests for information and be upfront and honest.
- Make your products, facilities, and records available for audits, inspections, and tests. Obtain required audits, inspections, and tests in accordance with Local Bounti requests. Provide the results to Local Bounti and collaborate with Local Bounti to resolve any issues.
- Develop and maintain accurate records. These include financial records, production records, records of dealings with governments and government officials relating to your business with Local Bounti and records of goods and services supplied to Local Bounti.



Keep records sufficient to demonstrate your compliance with this Code and all other Local Bounti expectations.