

CODE OF CONDUCT



Policy Name: Code of Conduct
Implementation: Group
Policy Number: 1-001-000-000-21
Date: 23 April 2021

WHO THIS POLICY APPLIES TO:

This Policy applies to all directors, officers and employees of Australian Country Choice ("ACC") Group, and all subsidiaries, contractors, secondees, consultants, agents and other individuals or entities that are effectively controlled by ACC Group or act on its behalf, either directly or indirectly ("ACC Personnel").

It is the responsibility of all ACC Personnel to understand and comply with the Code of Conduct.

PURPOSE:

The ACC *Code of Conduct* is fundamental in demonstrating our commitment to the highest levels of integrity and accountability across the organisation as part of our license to operate in respect of our legal compliance; our people, our customers, supply chain, stakeholders and communities we operate in.

The *Code of Conduct* requires all our employees, contractors, agents and directors to ask "Are we doing it right? Does it align with the Code of Conduct?" Each and every person's engagement and time with ACC should be in accordance with our Values of:

Belief
Energy
Responsibility
Integrity
Grit
Humility; and
Team

These Values are reflected in how we conduct business, work with each other and our stakeholders every day. The *Code of Conduct* also requires all our people be mindful of the legal, regulatory and contractual obligations that govern our business and conduct themselves in accordance with those obligations in all of business and workplace activities.

The *Code of Conduct* applies whenever anyone is representing ACC, including outside ACC premises or outside of ordinary work hours. For example, during our own work functions, on social media, texting or emailing or when representing the ACC Group in the community.

1. CODE OF CONDUCT PRINCIPLES

All of our people must adhere to the Code of Conduct Principles in addition to complying with ACC Group policies, applicable laws and regulations that govern our business.

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1.1 Belief

- Have pride in our products, people and services
- Be passionate about our business, respect for heritage and value its future

1.2 Energy

- Bring positive energy to everything we do every day
- Be a go-getter
- Contribute and lead when/where necessary to create positive engagements, interactions and working environments / in the workplace

1.3 Responsibility

- Lead by example, no matter what your role is
- Take responsibility for our actions and omissions
- Contribute to the community(ies) in which we operate
- Ensure safety is paramount and part of the way we conduct business and our daily work activities
- Maintain and promote environmentally sustainable and responsible practices
- Ensure we protect our livestock, maintain high standards in relation to animal welfare and product as a high priority always

1.4 Integrity

- Always act honestly
- Always act ethically
- Value the opinions of others

1.5 Grit

- Never give up
- Be persistent in finding solutions
- Be open to change and finding a better way

1.6 Humility

- Show compassion and care about one another
- Respect everyone we engage with, their knowledge, skills and capabilities
- Admit when we are wrong and learn from our mistakes

1.7 Team

Working together toward a common outcome for ACC Group and each other that achieves:

- Health and safety of staff and livestock;
- Respectful and positive environments and relationships
- Clear communication and engagement
- Inclusive culture, respecting diversity and peoples core values



2. CODE OF CONDUCT

Our *Code of Conduct* sets the standards of behaviour for the whole of the ACC Group. The minimum requirements are:

- (a) Living the Code of Conduct Principles;
- (b) Behaving in a manner that upholds the integrity and good reputation of the ACC Group (including its employees), its livestock, products and services;
- (c) Behaving honestly and ethically - acting always with care and diligence in the performance of our work;
- (d) Treating everyone, both internally and externally, with respect and courtesy;
- (e) Fostering a work environment that encourages and supports equal opportunity, embraces diversity and does not tolerate discrimination, harassment and/ or unethical conduct;
- (f) Behaving in a manner that promotes, secures and values the health, safety, welfare, and the environment for yourself and others on all of our premises/ operations;
- (g) Complying with our policies, procedures and work instructions and undertake our work in manner that is lawful;
- (h) Using ACC Group resources and assets in a proper manner and for proper purposes, including using your position, status, authority and power in such a way not to seek to benefit or gain an advantage for yourself or another party, and/ or put at risk ACC Group resources (e.g. IT Infrastructure); and
- (i) Being honest and truthful about our business.

In conducting ourselves in compliance with the *Code of Conduct*, we can deliver on our core values to “**BE RIGHT**” by doing it the right way in everything we do.

3. COMPLIANCE WITH THE CODE OF CONDUCT

It is expected that all ACC Group directors, employees, contractors and agents will adhere to the *Code of Conduct* and report any instances of potential or an actual breach of the *Code of Conduct* to through their reporting line and HR. Where the potential or actual breach of the *Code of Conduct* is by the person being directly reported to, the report should be made to that person’s manager.

Where there are matters that are reportable incidents consistent with the ACC *Whistle-blower Policy and Procedure*, managers and HR have an obligation in these circumstances to ensure any person reporting potential breaches are given a copy of the ACC *Whistle-blower Procedure* and briefed of their protection under that policy/procedure. On completion they will advise the ACC Group General Counsel of the breach report and the provision of policy action.

ACC has a responsibility to respond quickly and effectively to reports of any breaches of the *Code of Conduct*, which may include investigation, intervention and transparent closeout action such as (but not limited to): changes to operations and work methods; specific training/ coaching, reporting to third parties and/or, in the event of serious misconduct, disciplinary action up to and including termination of employment.



4. FURTHER INFORMATION

All employees, contractors and agents are encouraged to speak with their line manager and People & Culture for further information and guidance to help them understand and apply the *Code of Conduct*.

5. POLICY AMENDMENT

This Policy cannot be amended or otherwise altered without approval of the ACC Board.

It will be reviewed periodically to ensure that it remains effective and meets current legal requirements, industry standards and the needs of ACC Group.

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DOCUMENT CONTROL

Document Owner Chief Executive Officer

Signed:



Trevor Lee – Director

23 April 2021

Date

Version No.	Issue Date	Reason for Change
2.0	April 2021	Re-write to reflect amended strategy, restatement of values and behaviours and other HR policy adjustments.