



Business principles + ways of working

AWB Group

Internal document – unrestricted access

March 2008

LANDMARK
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 **AWB**

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Business principles + ways of working

Our future success and reputation rely on the way we work with our customers, suppliers and other external partners. It also relies on the way we work with each other. That's why it's important that we have a shared understanding of how we work together and a clear framework to guide our actions and intentions; in the workplace and in the communities we operate in.

This framework is known as our **business principles + ways of working** and is the updated version of the current code of conduct. Our **business principles + ways of working** apply to each person who works for the AWB Group of companies, in each country where we conduct business. Each of us - as an employee, contractor, agent, representative or director of the AWB Group – is expected to conduct business in line with our principles, values and all relevant laws and regulations.

The AWB Group's vision is to be Australia's leading manager of agricultural commodities and services. We will leverage our existing brands, customer bases and business model across a broader range of services and agricultural commodities to be the business partner of choice for primary producers and customers.

The Group's vision combined with our short and long term strategy outline what we are going to do. Our **business principles + ways of working** create the framework for how we will achieve this. This framework outlines how we conduct ourselves in business and works in conjunction with specific group and business unit policies.

Our **business principles + ways of working** are underpinned by our values. In 2006, many people in the Group took part in developing these values and supporting behaviours. Sometimes when it comes to how we need to behave in business, there are no clear rules and regulations and we need to exercise good business judgement. These values developed by your colleagues are the guiding principles we use when in this type of situation.

Our values

Integrity + Accountability + Customer focus + Teamwork

If you are uncertain about how to act in a particular situation, talk to someone and seek advice before you act. Speak to your colleagues to get their view or talk to your manager, a member of the Corporate Risk team or someone from the appropriate support function, such as Legal, Human Resources, Finance or Corporate Affairs.

You are responsible for reporting any concerns you have about potential violations of these business principles to your general manager, either through your manager or HR. If you feel unable to raise an issue in this way, the Whistleblower Protection Program provides an alternative for you. You can make a confidential, anonymous call to the Whistleblower Protection Hotline to report unacceptable or undesirable conduct.

To access the confidential alert line:

- from Australia, call 1800 016 109
- outside of Australia, call +61 3 9209 3330
- email: wb@awb.com.au.

Business principles + ways of working

Please take the time to read and understand these **business principles + ways of working**. This framework for how we operate has four parts:

- you + your accountabilities
- ways of working
- how we work with stakeholders + community
- complying with our business principles + ways of working.

It's essential reading, as it will give you an insight into your role and expectations for acting responsibly and ethically in the workplace. These **business principles + ways of working** are the foundation for the way we run our business and underpin our success in the future.

Whatever the environment you may conduct business in, you must never compromise legal and ethical integrity. Each of us, as a representative of the AWB Group has an obligation to know and understand the applicable laws, company policies and practices, and to act responsibly.



Gordon Davis
Managing Director – AWB Limited

March 2008

[AWB Group policies available on the intranet](#)

- Whistleblower protection program and policy

You + your accountabilities

Our **business principles + ways of working** are the framework for how we do business and work in conjunction with specific group, country and business unit policies. All of our policies are located on the AWB Group's intranet, **one**.

As an employee, contractor, agent, representative or director of the AWB Group

You need to know and understand what's required of you when doing business. You need to comply with all relevant laws, regulations and policies that apply to your job, operate professionally and ethically, in line with our values, and expected behaviours. You are ultimately responsible for your actions.

As a people leader

You need to communicate and demonstrate effective behaviours that reinforce **our business principles + ways of working** when you interact with your team and with others. This means making sure that all activities you undertake on behalf of the business are in line with our values - IACT. It also means giving your team feedback or advice when they are doing business so that their actions are in line with **our business principles + ways of working**.

As a business leader

You need to take overall accountability for communication, monitoring and compliance of our **business principles + ways of working** within your area of the business. You are also accountable for taking appropriate action if someone in your business unit breaches any of our **business principles + ways of working**.

Personal conduct

The AWB Group's values are at the core of all our activities and by demonstrating and adopting each of these values, we will maintain a high standard of ethical conduct.

As an employee, contractor, agent or representative of the AWB Group, you must carry out your obligations and responsibilities to the organisation appropriately, extend normal business courtesies in a professional manner and act with trust, loyalty and respect towards your colleagues, suppliers, customers and other key stakeholders.

Employees, contractors, agents or representatives of the AWB Group must be law-abiding and conduct themselves as good, responsible citizens, avoiding any indiscreet or anti-social behaviour that could affect performance or adversely reflect on the AWB Group.

For example:

- Q I will be travelling to a destination on business and would like to stop off at another destination on the flight route for the weekend before returning home. Is this acceptable?
- A Yes, provided you first discuss these arrangements with your line manager. You should incur any additional expenses yourself and conduct additional travel on personal time.

For example:

- Q I am in charge of general purchases for an AWB Group business and am buying office equipment for my team. A sales representative has confidentially offered me an attractive percentage of the sales commission. The representative's price is the best of the obtained quotes. Since there is no financial effect on AWB Group, can I accept the commission?
- A Although there is no financial effect, accepting the commission could create a perceived and actual conflict of interest for you the next time you need to deal with this supplier. In some circumstances, this may be a criminal offence. As they have offered the best price, you can buy the computers from the supplier but must decline the commission.

Safety, Health and Environment (SH&E)

Our values are at the heart of providing a safe and healthy workplace and operating appropriately in the communities where we work. That's why the AWB Group has standards in place which guide our actions and intentions in the workplace.

We are committed to providing a safe and healthy workplace for our employees, contractors, customers, visitors and the communities we operate in. Nothing is so urgent that anyone's safety, health or the environment is compromised by anything any of us do. Every employee has the accountability to stop any task at anytime if there is a perceived hazard to themselves, others or the environment.

We value and encourage people to take personal and collective accountability for preventing workplace incidents by identifying and resolving workplace risks to eliminate injuries and illnesses. We also value looking out for each other's safety and wellbeing through teamwork. All employees have obligations to operate in this way, at all times.

The AWB Group SH&E policy (formerly known as ESH) prohibits the unlawful use of alcohol, and drugs at the workplace or when conducting company business.

You must be aware of and understand the AWB Group's SH&E policy and all relevant procedures so that our workplace is safe and without risk to the health of others or yourself and follow any lawful and reasonable instructions consistent with the policy and associated procedures.

Diversity

The AWB Group seeks to maintain a work environment where diversity is valued and respected, to attract and retain people who can contribute towards our business objectives and to identify and remove barriers that prevent employees from performing to their full potential.

Discrimination, harassment and bullying will not be tolerated under any circumstances. Complaints or allegations of discrimination, harassment, victimisation or bullying will be investigated. Where a breach is substantiated, appropriate action will be taken, ranging from counselling to termination of your employment.

Fitness for work

The aim of the AWB Group is to provide a work environment free from the effects of alcohol, drugs and fatigue to ensure the safety, health and productivity of all workplaces and employees.

The use of drugs and alcohol may impair an individual's capacity to perform their job safely, efficiently and with respect for work colleagues and customers. The use of such substances may result in the risk

of injury or a threat to the wellbeing of the impaired employee, other employees, customers or any other parties.

An employee cannot commence work, operate company plant, equipment, or vehicles or return to work while under the influence of alcohol or drugs. You may not operate company plant, equipment or vehicles without the appropriate licence.

If you take prescription drugs, please check with your doctor to establish if the use of the drug will affect work requirements or performance. If so, please obtain this advice in writing and provide this advice to your manager.

For example:

Q I was caught speeding and my licence was cancelled. Do I need to advise my manager or HR? Are there any implications for me?

A Yes, you need to advise your manager and HR. If your role requires you to drive a tool of trade vehicle, a forklift or operate any other company vehicle, and you can no longer do this, you may be considered unfit for your role. This may result in termination of your employment. If you fail to advise the business and HR, then you will face disciplinary action and/or termination.

Company vehicles

Company vehicles must not be driven by anyone who is under the influence of alcohol or drugs. Driving a company vehicle while in excess of the legal blood alcohol limit for operating a motor vehicle, or while under the influence of illegal substances is prohibited. As an employee, if you are suspected to be under the influence of drugs or alcohol, you may be requested to undergo drug and alcohol testing. This also applies to employees using their personal vehicle for company purposes.

The AWB Group won't accept any liability for any damage to a company vehicle, injury to any person, or damage or injury to any third party, incurred while the driver of a company vehicle is in breach of AWB Group policy or the law. All liabilities rest with the vehicle driver.

Support

The AWB Group provides all permanent employees and their immediate families with the services of an Employee Assistance Program (EAP). The EAP provides access to independent professional counselling and assistance to help employees deal with any work or personal issues.

Standard of dress and appearance

The AWB Group expects all employees to maintain professional standards of personal presentation. The key guideline is to dress for the circumstances and use common sense.

Where your role requires you to wear a uniform, you need to keep it clean and in good condition. If you are not required to wear a uniform, the standard is business appropriate clothing. For men this includes a business shirt and tailored trousers / suit trousers. For women this includes shirt and tailored trousers / suit trousers / skirt / dress. A tie or suit may be appropriate if you are meeting with customers, clients or external parties.

Privacy

The AWB Group is a responsible and conscientious employer, with a clear policy to protect and respect personal information provided to it by employees in the course of their employment. From time to time, you may become aware of personal details relating to a colleague. It's important that you handle this information sensitively and in absolute confidence at all times.

For example:

- Q An employee diagnosed with an incurable disease has confided in me. The employee wants it kept secret and to keep working. What should I do?
- A Explain to the employee that so long as the condition does not impose any threat to the health or safety of other employees, then you can keep the confidence. If the employee says that reduced work effectiveness may result from the illness, encourage the employee to inform their manager of the illness, as the employee has obligation to the AWB Group. The AWB Group will work with the employee to assess the situation and put in place any appropriate support mechanisms.

Appropriate use of company resources

Company resources are to be used for the purposes of doing business on behalf of the AWB Group and you are expected to use these resources responsibly and appropriately. This includes the use of any AWB Group business names and brands, which must be done in line with our business guidelines. It also includes the use of email and the internet.

On occasion, you may need to make a personal phone call while at work. The guide here is to understand that excessive use of company resources is not appropriate and to act responsibly in this situation.

International travel and safety

The AWB Group recognises the need to provide for employee wellbeing, legal compliance and business continuity when requiring employees to travel and work in countries other than their country of residence.

All employees intending to travel to countries outside of their country of residence are required to follow the Group travel policy and approvals process, including preparation, obtaining and consideration of the information about local conditions and contacts before departing overseas, including any special arrangements or precautions to be taken prior to departure.

Contractors working for the AWB Group are also obligated to follow the AWB Group policies and procedures when engaged on AWB Group business.

[AWB Group policies available on the intranet](#)

- AWB privacy policy
- Company vehicles policy
- Fitness for work policy
- Travel and expenses policy
- Safety, Health and Environment (SH&E) policy
- Acceptable use policy
- Internet policy
- Email policy

Ways of working

Each of us - as an employee, contractor, agent or representative of the AWB Group – is expected to conduct business in line with our principles, values and all relevant laws and regulations.

Good business practices, and the AWB Group's ways of working, mean that as an employee you:

- avoid deception, unfair practice, fraud, misrepresentation, improper personal gain (including trading for personal gain) or any behaviour which would reflect badly on the AWB Group
- act with honesty and in good faith in all dealings and relationships
- have respect for the trust placed in you to take proper care and protection of all the AWB Group's assets, resources and information
- understand that how you go about business activities on behalf of the AWB Group is as important as what you achieve.

For example:

- Q The AWB Group has operations in countries where laws may be less rigorous than in Australia. What rules apply?
- A At a minimum, the AWB Group will respect the laws applicable in the country where it is operating, but to maintain a consistent approach we strive to achieve Australian standards where they are more rigorous.

Disclosure or misuse of AWB Group information

Unauthorised disclosure of company information is prohibited. All information relating to the AWB Group obtained by employees in the course of their employment is confidential unless the AWB Group has officially made the information public. This might include information such as financials and budgets, forward projections, advertising, marketing, business process, systems, customer details and information, intellectual property or acquisitions and sales.

The AWB media guidelines and the AWB continuous disclosure policy outline how the Group deals with the distribution of information to external parties. Generally, information relating to the AWB Group can only be provided where there is an existing arrangement or authority exists to do so. If you are in doubt, refer to your business unit or function general manager for approval.

The destruction of company information is illegal and you have an ongoing obligation to preserve documents and records as part of the way we do business every day. The document retention policy outlines the responsibilities and obligations of the company and individuals with respect to the preservation of company information.

For example:

- Q One of my close friends works for a supplier tendering for an AWB Group contract. Over a beer he asks me how his company's tender is looking. What should I do?
- A Providing any information regarding company business that could be used to the advantage of a competing bidder would be a breach of confidentiality and would be unfair to other bidders and possibly the AWB Group. Advise your friend that you are unable to comment.

Conflict of interest

Conflicts of interest occur when personal interests (or those of an associate or relative) conflict or have the potential to conflict with your obligations to the AWB Group (such as interests competing against the company or its clients directly or indirectly). If the AWB Group believes conflict exists or potentially exists, the Group can instruct the employee to act or cease to act in a certain way.

All employees, contractors and representatives must identify and manage potential, actual or perceived conflicts of interest in accordance with the AWB Group conflict of interest policy and report any conflicts that affect them to their line manager. Managing conflicts of interest must be considered when implementing change, developing new products or new business strategies.

Conflicts of interests must also be disclosed to customers in a timely, prominent, specific, concise and meaningful way. Disclosures must be in a form that allows the customer to make an informed decision about how the conflict may affect the service being provided to them.

All processes and arrangements, assessments and breaches relating to conflicts of interest need to be documented, including the details of the conflict itself and action taken to manage the conflict.

Where a person knows of a potential or actual conflict of interest, that person has a duty to report the matter to their business unit of function general manager or the managing director for decision and direction.

Where an employee directly supervises, or reports to, or could influence the hiring, work assignments or evaluation of a family member, or member of household, this can give rise to a potential, actual or perceived conflict of interest. An employee in this situation must discuss it with their manager and their HR business partner before acting.

For example:

- Q My brother has recently been appointed to a senior position for a contractor that provides transport services to AWB Group. My role involves managing some of the AWB Group's transport contracts. What should I do?
- A There is the potential for a conflict of interest here which must be avoided. You should inform your line manager and request that you not have any involvement with the contract between AWB Group and your brother's employer.
- Q I own a rural farming property and intend to purchase livestock at company conducted sales. What should I do?
- A Declare the conflict of interest to your manager and arrange immediately for the purchase to be completed via an arms length third party, which has no direct association with the AWB Group.

AWB "B" Class shares

Employees are not permitted to deal with "B" Class shares within 12 months of initial acquisition unless written authorisation is given by the Managing Director. Employees exposed to profit reporting details are also prohibited from dealing in "B" Class shares other than during specified 'window periods' being:

- the six week period commencing two days after the announcement of the half year results
- the six week period commencing two days after the announcement of the annual results
- any other period, of such duration, as determined by the AWB Limited Board from time to time.

However, if employees are in possession of inside information during these window periods, they must not deal in the shares.

Employees exposed to profit reporting details must consult their general manager prior to any dealing in “B” Class shares. Similarly, managers must consult the Managing Director and Directors must consult the Chairman prior to any dealing in “B” Class shares.

Insider trading

Employees who may consider themselves to be in possession of share price sensitive information must comply with the legislation governing “insider trading” and related issues outlined in AWB Group’s Share Dealing Guidelines.

Employees who are in possession of information, which is not generally available and which would reasonably be expected to have a material effect on the price of “B” Class shares, must not deal in those shares until this information has been made generally available (which requires that a reasonable period has elapsed since it was first disclosed). In addition, employees are prohibited from directly or indirectly communicating inside information to another person if they know, or ought reasonably to know, that the other person would or would be likely to deal in the relevant shares.

More information regarding share dealing can be found in the AWB Group’s Share Dealing Guidelines policy.

Futures trading

No employee should engage in commodity futures contracts unless they are in a position of producing the matching physical commodity. Where an employee produces the commodity – operates a farm – that information must be disclosed to his/her manager in line with the AWB conflict of interest policy. If operating a farm, the individual should disclose the aggregate of the commodity production by commodity category and sales to the individual’s line manager. Employees in the trading divisions of the AWB Group with access to current information about AWB’s grain hedging must not deal in wheat futures.

Trade practices

The AWB Group and its employees have an obligation to comply with the requirements of the Trade Practices Act when dealing with external parties. This involves avoiding the use of misleading or deceptive statements, refraining from engaging in collusive or anti-competitive conduct with other companies and so on. For further information and advice if you are faced with a situation which you think may be a breach of trade practices legislation, contact the Legal team or the Chief Risk Officer.

Purchasing contracts for goods and services

The AWB Group requires that the purchase of goods and services or the engagement of contractors be conducted in an ethical and fair manner. These arrangements should be based on:

- AWB Group tender requirements
- fairness and equality of treatment of suppliers and contractors
- a clear and unambiguous statement of requirements, including a requirement that the contractor comply with all relevant laws
- strict application of the rules and procedures during negotiation and selection.

For example:

- Q I have been approached by a contractor who proposes to reduce AWB Group's road transport costs substantially by overloading trucks. What should I do?
- A The AWB Group, through its action, should not be seen as condoning behaviour that is in breach of the law and could render the AWB Group responsible under chain of responsibility legislation. You should advise the contractor that the proposal is unacceptable and contractors are expected to respect the relevant laws while engaged on AWB Group assignments.
- Q I have the opportunity to save the company money by asking a supplier to backdate an invoice to reduce the tax liability. What should I do?
- A Evading lawful tax payments is illegal and this would not be acceptable. Your action would also compromise the integrity of the AWB Group with the supplier.
- Q The AWB Group has a long-term contract to buy exclusively from a supplier at agreed prices. To test the market price, I can go out to open tender knowing that I will not be purchasing. Is it appropriate to go to open tender in this situation?
- A Since a commitment already exists, this would be unfair to the contracted company and to companies that may incur considerable expense tendering for business that does not exist. You may be breaking the law, you will certainly damage the trust we have developed with current and potential suppliers, and you may have harmed the AWB Group's reputation.

Gifts, donations and hospitality

You must not take advantage of your official position to obtain a benefit for yourself or another person and should take into account the following:

- your capacity to influence dealings that the AWB Group may have with the gift or hospitality provider or related parties
- the improper personal benefit that may flow to you or a relative, friend or associate through the exercise of that influence
- whether the activity is fraudulent, corrupt or is an irregular transaction.

Incentives and inducements

Employees may not accept or offer incentives or inducements in any form and the acceptance or offer of cash incentives is prohibited.

You may only accept a gift or benefit as follows:

- unsolicited gifts or benefits of a value less than \$500 or of an inconsequential or trivial nature
- where refusal may offend or if the value is estimated to be greater than \$500, you need to speak with your manager. Unless your manager approves this, it should be returned without delay with an explanation of the company policy
- prizes won as a result of conducting official business must be reported to the Managing Director or Chairman and become the property of the AWB Group.

Functions

Where invitations to local sporting, social and cultural functions are offered, care should be taken to ensure that your presence does not imply an inappropriate relationship with the host or preference in your dealing(s) with that person. Entertainment of (or by) clients and suppliers should not extend beyond

a level reasonably required to maintain an arms length business relationship. It's to be restricted to the local state level unless your State Manager or business unit general manager gives specific approval for an employee to travel interstate.

Take care when accepting any items so that there is no misunderstanding created in terms of there being any reciprocation or "tied" benefit.

Employees must not accept any gift or benefit as follows:

- cash/cheques/vouchers (which may be cashed)
- discounts or free services, goods, club memberships, subscriptions unless freely available to other employees without discrimination
- gifts, benefits or hospitality during any period of contract negotiation or where it may give the appearance of undue influence. As hospitality may be common when negotiating a deal, employees should clear it with their manager to avoid an appearance of undue influence. In situations involving benefits such as personal travel / accommodation for sporting / social / cultural events or non-business arrangements, you need to seek approval from your state manager or business unit / function general manager.

For example:

Q How do I seek necessary approval from my manager for gifts and attendance at client or supplier function?

A Email relevant details to your manager who will reply with a copy to HR and this will be kept on file.

Q I've been offered a jacket by a supplier. Can I accept it?

A If the gift is offered as an inducement to influence a decision or if it is expensive or exclusive, it should be refused or handed to a senior manager for donation to a charitable organisation. If the gift is offered independently of a decision, is inexpensive, or it is industry practice to provide tokens or advertising material, you may accept it. In some cultures, it is customary to give and receive gifts and refusal may be offensive. In these situations, it is best to accept the gift on behalf of AWB Group and let your manager know.

Q I won a prize at a supplier's function. Can I keep it?

A If the prize was made available to everyone at the function or in a competition and was given freely without conditions relating to the AWB Group business, then you may keep it. You should disclose this to your manager.

Q It is common for suppliers to invite AWB Group employees to functions where food and drink are freely supplied. Should I attend?

A. Provided that the function is in keeping with industry practice, a wide cross section of interested people is invited and there is no intention to influence a decision, there is no conflict of interest. You may attend the function.

[AWB Group policies available on the intranet](#)

- AWB document retention policy
- AWB Group's share dealing guidelines policy
- AWB Group conflict of interest policy
- AWB media guidelines

How we work with stakeholders + community

Communicating with customers

The AWB Group values its customers and respects their privacy. We collect information in an effort to improve our customers' experience in dealing with us and to communicate about our services and products. We recognise that we must maintain and use customer information responsibly and we will use good faith efforts to respect customer preferences about how we use their information.

We recognise that maintaining clear lines of communication with our customers is vital to managing our business relationships effectively. We only want to send information to our customers if they want to receive it and we want to communicate with our customers in the manner that works best for them - whether that is via email, phone, fax or direct mail. However, we must balance that with our regulatory obligations under country specific privacy acts, spam acts and associated legislation.

Facilitation payments

In some countries, it is accepted practice for agency payments to be required if a service or contract is to be effected. In these circumstances, payments may only be made within the defined policy arrangements as approved by the AWB Board and Management Team and which are within the law. Local laws as well as Australian laws will apply to all such payments. If approved, you need to keep detailed records of the payments.

It is not illegal under the Commonwealth Criminal Code to provide a small benefit to a foreign public official in order to facilitate routine government action of a minor nature, such as the granting of a visa or a permit. Routine government action will not involve decisions about whether to award new business, continue doing business or the terms of doing business. However, local laws may prohibit facilitation payments.

The AWB Group opposes the making of facilitation payments to speed up routine administrative services that should be provided without additional payment. The making of facilitation payments to foreign public officials ought to be resisted wherever possible. If you are unsure about how the Commonwealth Criminal Code applies, please contact the Legal team.

Agency payments

Agency payments must be made strictly in accordance with the Payment in Connection with International Wheat Sales policy guidelines and have the prior approval of the business unit or function general manager or managing director. If an agency payment relates to something outside of these policy guidelines, it must also have the prior approval of the business unit or function general manager or Managing Director.

Payments or benefits can only be given in accordance with the Commonwealth Criminal Code, which provides that it is a criminal offence to bribe a foreign public official. You or the AWB Group may be guilty of a breach of this criminal code if you try to obtain an advantage that is not legitimately due to you by providing a benefit to a person with the intent of influencing a foreign public official.

For example:

- Q I am at the airport about to leave a foreign country when I am asked by an immigration official to pay departure tax. I believe I may be prevented from leaving the country unless I pay. There is not another scheduled flight for three days. What should I do?
- A When operating in foreign countries there may be times when you feel physically threatened and believe that delay or inconvenience is likely to result from a particular action. The AWB Group expects you to make every effort to comply with the law but recognises that sometimes it is in the interests of your wellbeing and the AWB Group for payment to be made. If payment is made, document the amount and circumstances.
- Q I am managing an operation in a country where it is accepted practice for government officials to receive facilitation fees to speed up government approvals. Should I work within the system?
- A Where payment of these fees would break the law, the AWB Group does not make the payments. If it is legal to pay facilitation fees and local business practice to pay them, you should review the matter with your line manager. You should consider if payment would be ethical or if its disclosure would cause embarrassment to the AWB Group.

International trade

The AWB Group undertakes business in a global arena and must act in compliance with laws and regulations in force in the jurisdictions in which we operate when assessing trade opportunities or undertaking trade transactions

Trade and economic sanctions put in place by the United Nations, USA, European Union or local governments have differing degrees of impact on AWB and our trade customers. Any transactions with the potential to be affected by trade sanctions must comply with the AWB sanctioned trade policy and the AWB anti money laundering & counter-terrorism financing policy.

Political donations

AWB does not permit donations to be made to political parties. Attendance at fundraising functions and the participation in fundraising events (such as the purchase of raffle tickets or attendance at seminars) is permissible subject to the guidelines above and in line with AWB's political donations policy. The cost of any contribution must be declared and AWB will lodge electoral disclosures of such contributions.

[AWB Group policies available on the intranet](#)

- Payment in connection with international wheat sales policy
- AWB sanctioned trade policy
- AWB anti-money laundering and counter-terrorism financing policy
- AWB political donations policy
- AWB communicating with customers policy

Complying with our business principles + ways of working

Our **business principles + ways of working** apply to all employees, contractors and agents of the AWB Group, in each country where we operate. Any breaches may result in disciplinary action or other penalty including dismissal or termination of your employment, contract or engagement.

Speaking up

If you are uncertain about how to act in a particular situation, talk to someone and seek advice before you act. Speak to your colleagues to get their view or talk to your manager, a member of the Corporate Risk team or someone from the appropriate support function – Legal, Corporate Affairs, HR or Finance – before you act.

You are responsible for reporting any concerns you have about potential violations of these business principles to your general manager, either through your manager or to your HR business partner.

Alternatively, if you feel unable to raise an issue in this way, you can make a confidential, anonymous call to the Whistleblower Protection Hotline to report unacceptable or undesirable conduct.

You are required to comply with any investigations into concerns about breach of our **business principles + ways of working**, and the AWB Group's policies and procedures.

Any person who breaches these **business principles + ways of working** (including by failing to report a suspected breach, or by victimising another for reporting a concern) may be subject to disciplinary action, which may include termination of employment.