

# Corporate Ethics

## & Code of Conduct Policy

### Contents

Managing Director's Introduction	2
Code of Conduct	3
Responsibilities under the Code	3
Business Practices	3
Respect for others	3
Community	4
Conflict of Interest	4
Agency and Facilitation payments	5
Gifts and Hospitality	6
Purchasing contracts for goods and services	7
Protection of assets	8
International travel and safety	8
Personal Conduct	9
Standard of dress and appearance	10
Corporate Wardrobe Policy	10
Disclosure of misuse of AWB Group information	10
Occupational Health and Safety	11
Drugs and Alcohol	11
Company Vehicles	11
Prescription Drugs	12
Smoking	12
Support	12
Futures Trading	12
Insider Trading	12
AWB Group "B" Class Shares	12
Privacy	13
Trade Practices	13
Non-compliance	13
Code of Conduct Policy acknowledgement	15

## Dear Colleagues,

AWB Group's vision, mission and values sets out our goals. Our vision is that the AWB Group will be Australia's leading global manager of agricultural commodity assets, services and flow. Our mission is that the AWB Group will leverage the existing brand, customer bases and business model across a broader range of services and agricultural commodities to become both the producers' and end use consumers', business partner of choice. Our business objective is to maximise value for growers, customers and shareholders.

It has become an essential element of good business practice for the Board and Executive of commercial organisations to provide a clear set of 'values' that emphasise a culture encompassing strong corporate governance, sound business practices and good ethical conduct.

The Code of Conduct has been prepared for the guidance and benefit of all people employed, contracted by, associated with, or acting on behalf of AWB Group. You are required to read, be familiar with and comply with the Code.

At AWB Group we promote and demonstrate clearly that our business affairs and operations are at all times being conducted legally, ethically and in accordance with the highest standards of integrity and propriety. This is a fundamental principle of AWB Group's operations and business affairs.

Our Code of Conduct is based on this principle and provides the foundation for the dealings and relationships on which our reputation with customers, suppliers and stakeholders is based.

Adherence at all times to these values and standards is essential. It will ensure that AWB Group maintains a reputation for high standards of business conduct, professionalism and integrity. We will ensure that AWB Group is proud of what it stands for as an organisation. No employee should ever feel that their conduct could not survive the test of public scrutiny.

I, and all other members of the Board, will adhere to the values and standards in the Code of Conduct and I require all of you, whatever your position within AWB Group, to do the same. By doing so we can be proud of our achievements as individuals and as a successful agribusiness.

A handwritten signature in blue ink, appearing to read "Andrew Lindberg", is written over a horizontal blue line.

Andrew Lindberg

Managing Director and Chief Executive

# Code of Conduct

AWB Group's Code of Conduct is made up of two components – Business Practices and Personal Conduct. A series of questions and answers has been listed throughout this brochure to illustrate appropriate behaviours for all employees regardless of employment status. The examples are for guidance only and are not intended to authorise any of us to act in a particular way in any particular situation.

## Responsibilities under the Code

You are required to regularly read and familiarise yourself with the current version of this Code of Conduct.

You are required to comply with the Code, and seek assistance from the Human Resources Division when you have questions about its scope and/or application.

You must promptly report any concerns you have about potential violations of the Code, in writing or orally to the General Manager through your line manager or to the Human Resources Division.

In addition to this Code, AWB Group also has policies and procedures that apply and are updated from time to time. You are also required to read and comply with those up to date policies and procedures.

You are required to comply with any investigations into concerns about breach of the Code, and AWB Group's policies and procedures. Retribution against a person for reporting or supplying information about a Code or policy concern is prohibited.

Any person who breaches the Code of Conduct (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 the relevant contract)

## Business practices

AWB Group is committed to ensuring that the actions and behaviour of people acting for or on behalf of AWB Group in terms of business practice are legal and ethical. All employees should consult with their General Manager in any situation of concern or doubt. Good business practice includes:

- Avoidance of deception, unfair practice, fraud, misrepresentation, improper personal gain (including trading for personal gain) or any behaviour which would reflect badly on AWB Group;
- Honesty and good faith in all dealings and relationships;
- Respect for the trust placed in you to take proper care and protection of all AWB Group's assets, resources and information; and
- Ensuring that neither interpretations of AWB Group's perceived interests nor loyalty to other staff members should be allowed to compromise or override the law or appropriate standards of ethical behaviour.



## Respect for others

AWB Group people will treat others with courtesy, dignity and respect.

AWB Group is committed to providing all employees with an equal opportunity and non-discriminatory workplace. You are required to comply with AWB Group's policies prohibiting harassment, discrimination, bullying and victimisation, which are set down in the Human Resources Policy. This approach also extends to our relationships with customers and suppliers.

AWB Group does not permit unlawful discrimination and harassment on the basis of age, breast feeding, impairment, industrial activity, sexual orientation, marital status, physical features, medical status, political belief or activity, pregnancy, race, religion, sex, family responsibilities or status as a carer, irrelevant criminal record, HIV/AIDS status or personal association with a person who is identified by reference to any of those attributes.

Bullying and victimisation are also prohibited. Bullying includes unreasonable demands, constant and unnecessary surveillance, shouting and abusive language and threatening behaviour. Victimisation occurs where someone is treated detrimentally because they have raised a genuine complaint or given information in relation to a complaint.

You are required to comply with AWB Group policy and to raise any complaints of discrimination, harassment, bullying or victimisation promptly in accordance with the policy.

## Community

We are responsible to the communities in which we live and work. We must be good citizens of that community. All employees are responsible for maintaining and protecting the environment. Employees should therefore, always consider the impact of their activities on the environment and the local community, including the way in which waste is disposed, chemicals are stored and transported and natural resources utilised.



## Conflict of interest

During your employment you are required to act with honesty, decency and integrity at all times. Employees are expected to devote their best efforts to the interests of the Company and the conduct of its affairs.

A conflict of interest exists where loyalties are divided. A person can have a potential conflict of interest if, in the course of their employment or engagement with AWB Group, any decision they make provides any improper gain or benefit to themselves or associates.

Conflict of interest can also be defined as an issue that may occur when personal interests, the interests of an associate, or relative, or a duty or obligation to some other person or entity, conflict or have the potential to conflict with obligations owed to AWB Group (ie. Competing against the company or its clients directly or indirectly). It is sufficient that if AWB Group believes conflict exists or potentially exists, it may instruct the staff member to act or cease to act in a certain way.

Potential direct or indirect conflicts of interest of employees or those acting on behalf of AWB Group (or their family, relatives, friends or agents) are to be avoided unless specific written consent has first been obtained from your General Manager.

Where a person knows of a potential or actual conflict of interest, that person has a duty to report the matter directly to the highest level for decision and direction.

If the person is a member of staff then the report should be made to a General Manager who in turn should advise the Managing Director. Directors should raise their concerns directly with the Chairman.

For details and specifics of Conflict of Interest within your area of activity please refer internal activity policies and applicable legislation.

Q. My brother has recently been appointed to a senior position for a contractor that provides transport services to AWB Group. My work for AWB Group involves managing some of 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 supervisor and request that you not have any involvement with the contract between AWB Group and your brother's employer.

Q. I own a 50% share in a rural farming property and intend to purchase livestock at company conducted sales. What should I do?

A. Arrange immediately for the purchase to be completed via an arms length third party, which has no direct financial interest in the trading entity.





## Agency, facilitation and related payments

In some countries it is accepted practice for payments to be required if a service or contract is to be effected. In such circumstances payments may only be made which are within the defined policy arrangements as approved by the Board and Executive and are within the law. Local laws as well as Australian laws will apply to all such payments. Approved payments will normally take the form of volume rebates or commissions to brokers or other agents.

All such payments must be made strictly in accordance with the policy guidelines. In particular, all payments referred to in this section of the Code of Conduct must have the prior approval of the member of the Executive Leadership Group of the appropriate Division or their authorised nominee. All payments must be recorded and reported to the Managing Director within one month of payment. The record must show the value of the benefit or payment, the date it was made, the identity of all people involved, why the benefit was given and the date the record was made.

Payments or benefits can only be given in accordance with the Commonwealth Criminal Code as amended or replaced. The Commonwealth Criminal Code provides that it is a criminal offence to bribe a foreign public official. You or 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.

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. 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 Department.

## Gifts and Hospitality

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

- Your capacity to influence dealings that 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; and
- 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 strictly prohibited.

*You may only accept a gift or benefit as follows:*

- Unsolicited gifts or benefits of a value less than \$300 or of an inconsequential or trivial nature;
- If the value is estimated to be greater than \$300 the offer shall be respectfully declined. If rejection of the offer may offend, then the offer may be accepted with notification of the offer and it's acceptance being made to the Managing Director. The result of all such offers shall become the property of AWB or as otherwise authorised by the Managing Director;
- Prizes won as a result of conducting official business must be reported to the Managing Director and become the property of 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 interpretation of your 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 is to be restricted to the local State level unless the Managing Director gives specific approval for a staff member to travel interstate. Where tickets are offered to local sporting, social or cultural functions, the estimated or actual value of the tickets should not exceed \$300.

## Training

Where an offer is made to attend a seminar, training or other educational session it may only be accepted if:

- The majority of the time allocated is to development or education (in excess of 80%) and
- It is restricted to local state travel.

Where interstate travel or accommodation is required it should be accepted only with the approval of the relevant ELG member. (The relevant ELG member is deemed to be the ELG member who has primary responsibility for management of the external relationship). If the offer also includes an invitation to sporting, social or a cultural function the guidelines detailed above also apply.

Where international travel is required the offer can only be accepted with the prior written approval of the Managing Director.



Note: Care should be taken in accepting such items to ensure that there is no misunderstanding created in terms of there being any reciprocation or "tied" benefit.

Employees must not accept a gift or benefit as described here:

- Cash/cheques/vouchers (which may be cashed);
- Discounts or free services, goods, club memberships, subscriptions unless freely available to other employees without discrimination; and/or
- 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 line manager to avoid an appearance of undue influence.

In situations involving benefits regarding personal travel/accommodation relating to sporting/social/cultural events or non-business arrangements, such instances must be submitted to the Managing Director for approval.



**Q.** I have 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 more senior company representative 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 such situations it is best to accept the gift on behalf of AWB Group and tell your line manager.

**Q.** Some work colleagues and I have been offered a supplier funded international trip. Can my colleagues or I accept?

**A.** All such offers would be in excess of the \$300 value and cannot be accepted. You and your colleagues should be respectfully decline the offer.

**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 AWB Group business, then you may keep it. You should disclose this to your line manager.

**Q.** I am an employee who has been offered supplier funded local product training in Sydney for 2 days. Should I attend?

**A.** Provided that 80% or greater of the value of the offer is product training (i.e. the 2 days spent in Sydney 80% is in training programs associated with the product) then you may accept if prior approval is sought from the Divisional Head.

## Purchasing contracts for goods and services

AWB Group requires that the purchase of goods and services or the engagement of contractors be conducted in an ethical and fair manner.

Such arrangements should be based on:

- Observance of AWB Group tender requirements as appropriate;
- 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; and
- Strict application of the rules and procedures during negotiation and selection.



**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.** AWB Group, through its action, should not be seen as condoning behaviour that is in breach of the law and could render AWB Group responsible under breach of responsibility. You should advise the contractor that the proposal is unacceptable and contractors are expected to respect the relevant laws while engaged on AWB Group jobs.

**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 AWB Group with the supplier.

**Q.** 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 AWB Group's reputation.

## Protection of assets

All employees of AWB Group are entrusted with the responsibility of protecting and ensuring appropriate use of AWB Group assets. AWB Group assets include money, documents, goods, intellectual property and electronic information. As a general rule, AWB Group property and documents may not be removed from official premises without a good and proper reason. If they are removed, they must be stored in a secure manner and covered by appropriate insurances.

It is the responsibility of all AWB Group employees and agents to ensure that personal computers and the resident software that are within their responsibility have been obtained legally and are used legally, without breach of copyright, and in accordance with AWB Group's Information and Technology Policy. Where it is proposed to install non-AWB Group standard software (e.g., legal references and accounting standards) such arrangements must be advised formally to the General Manager Information Technology Services.

**Q.** At night I run my own programs on the company's computer. Is there anything wrong with this?

**A.** It is AWB Group policy to use only company approved programs on the computers. If you want to operate the computer for personal use, you should talk to your line manager.

## International travel and safety

AWB Group recognises the need to provide for employee well-being, legal compliance and business continuity when requiring employees to travel and work in foreign countries.

AWB Group has policies and procedures for preparation for and undertaking overseas travel, work assignments or placement. All employees are required to comply with these policies and procedures, and to cooperate with AWB Group in any action taken or limitation imposed for their well-being, legal compliance or the protection of AWB Group interests.

AWB Group will – as a matter of good business practice and out of concern for employees and their families – maintain regular contact with the appropriate government organisations and agencies on matters of security and safety concerning countries in which AWB Group carries out its business or where AWB Group employees may be required to travel and work. Where appropriate AWB Group will obtain from appropriate providers, assistance in preparation for travel to and evacuation from overseas locations.

All employees who are intending to travel to foreign countries on AWB Group business are requested to inform the General Manager of any health or other matters which may need to be considered in determining measures to preserve their well-being or that of fellow employees or accompanying persons (for example, the need for ongoing medical treatment or medication which may not be available in the overseas location; or particular beliefs or practices which may offend local laws or customs).

Employees are also requested to:

- Obtain and consider information regarding local conditions and contacts before departing for the foreign country. AWB Group has an Internet subscription to the Control Risks Business Traveller package that provides information on specific countries. If requested the General Manager of your division will provide access to information from the service for you. It is essential that you search the Business Traveller package for information about each country you are travelling to, and consider whether circumstances described may give rise to a need for special arrangements or precautions.
- To ensure that where possible they are aware of and comply with local customs and regulations and to take considerable care to avoid being involved in any situation that might compromise them or AWB Group.
- Recognise that in some circumstances it may be necessary for AWB Group to decline permission or support for intended overseas travel, if that is necessary to protect people, AWB Group interests or to ensure legal compliance.
- Monitor local conditions and circumstances at all times, and advise AWB Group as soon as possible of any circumstances which may give rise to a need to alter or terminate arrangements for the travel, accommodation, the assignment or posting.

AWB Group Contractors are also required to comply with AWB Group policies, procedures and this Code of Conduct to the full extent practicable when engaged on AWB Group business overseas.

## Personal conduct

AWB Group fully respects the privacy of people employed or associated with the organisation and has no wish to intrude or dictate their personal conduct, morals and way of life. However, AWB Group expects that a person will carry out their obligations and responsibilities to the organisation appropriately, will extend the normal business courtesies in a professional manner and will act with trust, loyalty and respect towards their colleagues, suppliers and customers.

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

- Have integrity;
- Be accountable and responsible;
- Work as a team; and
- Be committed to Growers and Customers.

It is expected that employees and people associated with AWB Group will be law abiding and will conduct themselves as good and responsible citizens and will avoid any indiscreet or anti-social behaviour that could affect their performance or which could adversely reflect on AWB Group.



## Standard of Dress and Appearance

**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.

**Q.** I am in charge of general purchases for an AWB Group division and have been asked to buy 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 and in some circumstances may be a criminal offence (secret commission). As they have offered the best price you should buy the computers from them but decline the commission.

AWB Group expects all employees to adhere to professional standards of presentation that reflect on the image of the Company. All employees are required to maintain an appropriately high standard of dress and appearance and should maintain a neat and tidy appearance.

Standard business attire should be worn by all employees, with the exception of staff who carry out work in rural centres and have the opportunity to wear the corporate wardrobe. Refer applicable Uniform Policy.

Attire that should not be worn in the workplace is outlined in the Divisional Dress Standards.

On occasion, employees otherwise required to wear corporate attire may dress more casually (for example on authorised "casual days" or when attending training courses).



## Corporate Wardrobe

All company uniform ranges are chosen to reflect our professional image.

The supplier of the AWB Group's national company uniform will provide a clothing range that comprises functional and comfortable working apparel that is perfectly suited to the tasks each AWB Group staff member undertakes on a daily basis.

Enquiries about the purchase of the Corporate Wardrobe should be directed to your line manager in the first instance.

## Disclosure or misuse of AWB Group information

Unauthorised disclosure of company information is prohibited. All information relating to AWB Group business obtained by employees in the course of their employment is to be considered confidential unless the company has officially made the information public.

AWB Group has approved policy and procedures for dealing with the distribution of information to external parties. Generally speaking, the provision of such information should only be made where there is an existing arrangement or authority exists to do so. Where there is any doubt this should be referred to the appropriate member of the General Manager for approval.

Q. One of my close friends works for a supplier that is 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 AWB Group. You should advise your friend that you are unable to comment.

Q. AWB Group has operations in countries where laws may be less stringent than in Australia. What rules apply?

A. As a minimum, 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 stringent.





## Occupational Health and Safety

AWB Group is committed to maintaining a healthy and safe working environment. All staff have obligations to assist in ensuring that this situation is maintained at all times via their actions.

The AWB Group policy also prohibits the unlawful use of alcohol, and drugs at the workplace or when conducting company business.

You must be aware of AWB Group's Occupational Health and Safety Policy and all relevant procedures to ensure the workplace is safe and without risk to health of others or yourself and follow any lawful and reasonable instructions consistent with that policy and procedures.

## Drug and Alcohol Policy

AWB Group aims to provide a work environment free from the effects of alcohol and drugs to ensure the health, safety, respect and productivity of all 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.

No employee is to commence work, or return to work while under the influence of alcohol or drugs.

## Company Vehicles

Company vehicles are not to be driven by anyone who is under the influence of alcohol or drugs. AWB Group will accept no 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 this policy or of the law. All liabilities shall rest with the driver concerned.

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. Any employee found to have been driving a company vehicle while under the influence of drugs or alcohol may have the use of the car withdrawn, and continuing employment cannot be guaranteed. This also applies to employees using their personal vehicle for company purposes.

## Prescription Drugs

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

## Smoking

AWB Group observes a no smoking policy in all buildings and company vehicles. Smoking should be undertaken within designated smoking areas only.

## Support

The AWB Group provides all permanent employees and their immediate families with the services of an Employee Assistance Program (EAP) to assist employees in the treatment of,

- Conflict and Tension;
- Pressure and Stress;
- Alcohol and Drug issues;
- Child and Family issues;
- Work pressure/issues; and
- Relationship difficulties.

For details of the program and how to contact the service refer to HR policies and procedures.

## 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, i.e. operates a farm, that information should be disclosed to his/her line manager. 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 AWB Group with access to current information about AWB's grain hedging should not deal in wheat futures.

## Insider trading

Employees who may consider themselves to be in possession of share price sensitive information must make themselves familiar with and comply with the legislation governing "insider trading" and related issues and AWB Group's Share Trading Policy.

Essentially, 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 such 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 such 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.

## AWB "B" Class shares

It is AWB Group policy that 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 are also prohibited from dealing in "B" Class shares outside specified 'window periods'. Employees can only deal in "B" Class shares in the six week period commencing two days after each of the following events:

- the announcement of the half year results;
- the announcement of the annual results;
- the Company's Annual General Meeting; or
- the issue of a qualifying prospectus.



## Privacy

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.

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

AWB Group is responsible and conscientious employer and has a clear policy to protect and respect personal information provided to it by employees in the course of their employment.

From time-to-time employees will, in the course of their duties, become aware of certain personal details of their colleagues and it is expected that they will exercise discretion in ensuring that such particulars are handled discreetly and sensitively and in absolute confidence at all times.

People working within AWB Group are required to comply with privacy laws and AWB Group Privacy Policy.



**Q.** An employee who has been diagnosed with an incurable disease has confided in me. The employee wants it kept secret and to keep working. What should I do?

**A.** It should be explained to the employee that so long as the condition does not impose any threat to the health or safety of other employees, then the confidence can be kept. If the employee says that reduced work effectiveness is likely as a result of the illness, you should point out that employees have an obligation to AWB Group and should inform their line manager of the illness. In this case, AWB Group will act fairly in assessing the situation.

## Trade Practices

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 Legal Division.

## Non-compliance

The Code of Conduct applies to all employees, agents or people associated with AWB Group. It is recognised that breaches may occur from time to time. It is expected that any such breaches will be inadvertent and without intent, however it should be clearly understood that any such breaches may result in disciplinary action or other penalty including dismissal or termination of the contract or engagement.

If it is considered that a potential breach has occurred it should be reported to your General Manager through your line manager or to the Human Resources Division.

Where breaches are considered to be of a serious nature, penalties may be imposed ranging from counselling to dismissal. In such instances AWB Group will act objectively, fairly and equitably and consistent with any applicable provisions or requirements in an employment contract or Australian Workplace Agreement.

When it is considered that a breach of the Code of Conduct Policy has occurred, the handling of the process is to be administered by the Human Resources Division in consultation with the General Manager of the particular division in which the offending person is employed. AWB Group reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.



# Corporate Ethics

& Code of Conduct Policy

If you have any concerns or queries please contact HR on 03 9209 2348

# Code of Conduct Policy acknowledgment

I, \_\_\_\_\_

acknowledge that I have received a copy of the Code of Conduct from AWB Human Resources Division.

I have read and understood the Code of Conduct.

I understand that AWB regards observance of the Code of Conduct as being essential to good business ethics and practice.

I understand I am required to comply with the Code of Conduct and to promptly report any concerns about potential violations of the Code of Conduct.

I understand that I may be subject to discipline (including termination of contract) for breach of the Code of Conduct.

\_\_\_\_\_

Signature

\_\_\_\_\_

Name

\_\_\_\_\_

Division

\_\_\_\_\_

Date

Please return this Form promptly to Human Resources Division.

