



Greenham Group Code of Conduct



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

INTEGRITY INITIATIVES

STATEMENT OF INTENT

At Greenham Group our mission is, to:

- Efficiently produce the highest quality beef products.
- Strive to be leaders within our Industry.
- Provide our suppliers and customers with the best quality and service possible.
- Be a workforce that seeks excellence, and
- Continually improve on everything we do for the long term benefit of all our stakeholders.

In conducting ourselves, we have five core values that drive our behaviours, namely:

- **Integrity** – we are ethical, transparent and inclusive in all dealings with suppliers and customers.
- **Safety** – we provide a safe and healthy workplace for all staff, contractors and visitors.
- **People** – we value our employees and work together to better our industry.
- **Ideas** – we embrace innovation and are driven by an improvement culture, and
- **Community** - We are ardent supporters of local communities and organisations, particularly in rural areas.

The mission and core values are designed to guide our actions and how we interact with one another on a daily basis and are fundamental to the way we do business.

The Code of Conduct provides the opportunity to align our everyday activities and behaviours with these core values and to outline what we believe are the essential standards and conduct that should guide individual actions in a professional and corporate capacity.

By observing this Code and applying the mission and core values in all we do, we move towards creating and sustaining trusting, successful relationships with our customers, suppliers, colleagues, and the community.

Greenham fully expects that all employees are committed to and will uphold the standards and values contained within the Code of Conduct. Compliance with this policy for all employees is a requirement of employment with Greenham and any breach of this policy will be taken seriously, will be investigated and if found, may lead to disciplinary action up to and including termination of employment, depending upon the seriousness of such breach.

For the purposes of this Code, Greenham refers to those companies associated with Greenham Group of Companies, as follows:

HW Greenham & Sons Pty. Ltd.
Greenham Tasmania Pty. Ltd.
Greenham Gippsland Pty. Ltd.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

TABLE OF CONTENTS:

	Page No.
Integration with Mission and Values	2
Personal Integrity	4
Behaviour	4
Attendance	4
Alcohol and Drugs	4
Health and Safety	4
Political/Social Activity	4
Workplace Integrity	5
Diversity and Inclusiveness	5
Harassment, Discrimination and Bullying	5
Employment Practices	5
Internet / E-mail Usage	6
Pornography	6
Online Social Networks	6
Conflict of Interest	6
Use of Company Assets and Resources	6
Improper Conduct	7
Information Security	7
Discussion with Media	7
Customer Service Quality	8
Ethical Integrity	9
Community Integrity	11
Ethical Trading	11
Environmental Responsibility	11
Food Quality & Safety	11
Reporting a Breach of the Code of Conduct	12
Greenham Group Whistleblower Policy	12
“Whistleblower Protection Act” 2019 (Cth)	12
General Conditions	13
Background	14
Employee Declaration (where required)	14



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Personal Integrity:

Behaviour:

You are expected to present yourself and to behave professionally, lawfully, respectfully and courteously towards colleagues, customers and suppliers at all times in a manner that maintains the reputation of Greenham, whenever you are identified as a representative of Greenham. In some circumstances, this will include times when you are outside your immediate workplace or working hours.

Failure to do so will be considered a breach of the Code and may result in dismissal.

Attendance:

As part of the employment relationship, you are expected to attend work punctually in accordance with the hours agreed with your manager, laid out in your employment agreement and in accordance with any relevant Greenham Group policy. If for any reason your attendance will vary from these hours, you should inform your manager / supervisor as soon as possible.

Failure to do so will be considered a breach of the Code and may result in dismissal.

Alcohol and drugs:

Drugs and alcohol impair mental and physical performance and accordingly the use of these may compromise the safety of yourself and others in the workplace. As a condition of employment with Greenham all employees are required to report to work drug and alcohol-free, without impairment, and any breach of this policy will be treated as a disciplinary issue and may result in termination.

Health and Safety:

Promoting and maintaining a healthy and safe working environment for all employees is a key priority for Greenham. We have safety policies and procedures in place to protect the wellbeing of everyone employed by or visiting Greenham sites and all employees are required to understand and apply these. Greenham believes the safety, security, physical and mental health of all employees lies at the heart of each person's ability to contribute to our success, both individually and as work groups. Greenham respects the right of all individuals to work in a safe environment that promotes such wellbeing. All hazards, risks, accidents, or near misses should be reported immediately to your manager / supervisor so that we can investigate and address any unsafe working conditions.

Political/Social Activity:

Employees have the right to their personal political/social opinion(s) and to engage in activities to support these as they see fit. However, at all times care must be exercised to ensure that these activities are kept entirely separate to duties performed as an employee of Greenham and make it abundantly clear that your personal political/social opinion(s) are in no way indicative or representative of those of Greenham and that you do not represent Greenham as such.

Failure to comply with these standards of Personal Integrity will be considered a breach of the Code of Conduct and may result in disciplinary action, up to and including termination of employment.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Workplace Integrity:

Diversity and Inclusiveness in the Workplace:

Greenham is committed to encouraging and supporting diversity and inclusiveness in all aspects of the workplace including recruitment, promotion, and training in achieving a workforce that is inclusive and respectful of each other's differences. We are dedicated to ensuring that all employees are treated equitably regardless of race, gender, ethnic origin, physical appearance, disability, or religious, sexual, racial, or political orientation, or family circumstances.

We recognise the value that diversity brings to the organisation and strive to foster a climate that respects all individuals and promotes creativity and innovation.

Harassment Discrimination and Bullying:

We place great emphasis on the right of all Greenham's employees and others with whom we associate at work to be treated with respect and dignity and to work in an environment free from harassment, discrimination and bullying.

Greenham considers harassment (including sexual harassment) and bullying of any kind by or towards staff, contractors, visitors, suppliers or customers as unacceptable behaviour, which will not be tolerated under any circumstances.

Employment decisions shall only be based on merit and not on attributes that are irrelevant to employment and / or performance.

Employment Practices:

Greenham is committed to upholding all human rights in regards to national employment and modern slavery practices within all locations covered by this Code of Conduct. Greenham will ensure full compliance with all applicable workplace laws and will implement systems and processes to monitor compliance and performance in this important area of operation. This policy is extended to those suppliers who provide labour hire services to Greenham companies and it will be a requirement of doing business with Greenham, that any labour hire company agrees to operate at no less a standard than any Greenham company applies to its own operations. This shall include such responsibilities as:

- All employees must have a legal right to work in Australia;
- Employment conditions must meet or exceed the 10 basic minimum entitlements under the Fair Work Act 2009 Cth (the "National Employment Standards"); and
- Ensuring, as far as it is reasonable practicable, that all business operations shall be free of activities that would be defined as slavery, forced labour, bonded labour and/or human trafficking under the Modern Slavery Act 2018 Cth.

Should Greenham be made aware of a breach in this standard, they shall take immediate action to identify the extent to which such a breach applies and implement measures to rectify those circumstances to ensure compliance under this Code of Conduct.

Greenham has provided a Modern Slavery Statement that is available on the company's website at www.greenham.com.au/modernslaverystatement.html



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Internet/Email IT Usage:

While limited personal use of the Internet and email is acceptable, the provision of these services should not be abused. Limited personal use is permitted only to the extent that it does not interfere with the user's duties and functions or with any other person or organisation. Any use of the Greenham's computer systems must comply with the Greenham IT Policy. Further, no mobile phones are to be taken into Greenham facilities unless that mobile phone is a Company mobile phone and is used for work purposes.

Pornography:

In view of our legal obligations and intention to maintain a work environment free from sexual harassment, Greenham prohibits the displaying, viewing, accessing, storing, retrieving, emailing, posting and/or saving of pornographic material.

Online Social Networks:

Access to online social networks and media forums, such as Facebook, Twitter, Instagram and You Tube via the Greenham IT network is strictly forbidden unless it is for work purposes related to your role. However, if you use or plan to use these social networks and media forums in your own time, it is important that you are mindful of your association with Greenham. Comments made should not be representative of Greenham and should be clearly noted as individual comments. It is not OK to make any disparaging or negative remarks about Greenham, other colleagues, managers, customers, competitors, contractors and suppliers via online forums.

It is not OK to bully, harass or discriminate others via any social networks and media forums.

Make sure that you do not reveal any confidential information about Greenham. Information is considered confidential when it is not readily available to the public in the public space.

Greenham's brands, company logos, copies of promotional material and other Greenham information must not be used on these social media networking sites without prior approval from a senior manager. The use of company logos or branding without permission constitutes a breach of the Code.

Conflict of Interest:

Employees should not enter into any transaction or become engaged in any situation which might result in any conflict or create any obligation or expectation that could conflict with the interests of Greenham.

Employees should not accept benefits, gifts or other inducements from third parties associated with Greenham's business activities unless they are of a trivial or inexpensive nature and do not influence the outcome of any dealing on behalf of Greenham. In any event, the employee shall advise his or her manager of the receipt of all such items.

Accepting benefits, gifts, or other inducements from third parties without advising and seeking approval from a senior manager constitutes a breach of the Code.

Use of Company Assets and Resources:

Employees are to use company assets and resources responsibly and in Greenham's best interests. They should not disclose or otherwise make available any Greenham intellectual property or other propriety information to



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

any unauthorised parties. This includes intellectual property and other propriety information belonging to other parties which may be in the care of and/or for the specific use of Greenham.

Employees must use Greenham assets and resources only for the purposes of fulfilling our corporate responsibilities.

You must also ensure you return any resources and assets belonging to Greenham in an appropriate condition when no longer required.

Improper Conduct:

As a general rule, any employee that engages in improper conduct and, in particular, bribery, fraud or corruption in the course of his/her normal duties faces the prospect of immediate dismissal.

Improper conduct includes conduct which is fraudulent, corrupt, dishonest, illegal (including theft, drug sale/use, violence or threatened violence and criminal damage against property), in breach of the law (including any breach of the *Competition and Consumer Act 1974* (Cth) or state fair trading laws and any breach of the *Corporations Act 2001* (Cth)), unethical engagement in outside interests and activities or investments which could interfere with the performance of duties or constitute a conflict of interest.

Employees are encouraged to report to senior managers' improper conduct (including potentially fraudulent and corrupt conduct) by employees, suppliers, customers and other third parties as well as avoid conducting business transactions with others who do not have a zero tolerance approach to bribery and corruption.

Such information reported, will be dealt with in the strictest of confidence and anonymity will be assured. Any reporting of improper conduct will be managed in line with the Greenham Whistleblower procedures noted in this Code of Conduct.

Information Security:

Protecting and maintaining the Greenham's information, systems, and records is of critical importance to our competitive strategy and business success. In the course of your association with Greenham you may have access to and be entrusted with confidential information. This information must be treated confidentially and kept secure at all times. This includes using the information for legitimate business purposes, allowing access to it only to those who require the information in order to carry out their job, and refraining from discussing it in public places or with external parties.

Information confidential to Greenham can include information derived from commercial negotiations, agreements entered into by the company and any costing information relating to the operation of Greenham businesses.

All confidential and proprietary information must be immediately returned to Greenham when your association with Greenham ceases. Should you wish to access or retain any electronic records including emails, you must first seek permission to do so from your manager. Failure to do so will be a breach of the Code and legal/enforcement action may be taken against you.

Discussions and Contact with the Media:

Only specifically authorised spokespeople may represent Greenham in discussions with the media. Any approaches including questions from members of the media should not be responded to and must be immediately referred to your manager.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Customer Service Quality:

We are committed to delivering quality service in all dealings with suppliers, customers and potential suppliers and customers. This includes ensuring that all information is conveyed in an honest and forthright manner, free from misrepresentation and inaccuracy. The impact on our customers and our reputation should be the underlying consideration when making all business decisions as a representative of Greenham.

Failure to comply with these standards of Workplace Integrity will be considered a breach of the Code of Conduct and may result in disciplinary action, up to and including termination of employment.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Ethical Integrity

Ethical dilemmas arise in many business situations whenever different legitimate values conflict, such as:

- When a desire to communicate in an honest, open and straightforward manner conflicts with the need to protect proprietary information; or
- When production or distribution processes involve the use of materials that could be hazardous to the environment.

This Code sets standards for the way we work at Greenham because employees and contractors have a right to expect that the business of Greenham will be conducted ethically, efficiently, fairly, impartially and with integrity. These standards provide a guide to assist employees in resolving the ethical issues faced in their day-to-day work activities. Greenham places great importance on the values of ethical conduct, efficiency, fairness, impartiality and integrity.

All employees are expected to:

- Act as ambassadors and representatives of Greenham and demonstrate these behaviours at all times
- Set an example for others and recognise those around you who also demonstrate these behaviours
- Speak out when you feel that these behaviours are compromised in any way
- Operate in such a way as not to disparage the reputation of Greenham in the public standing

As employees, each of us is accountable for adhering to Greenham's Core Values in the conduct of our work. When different elements of our values conflict in a given situation, our obligation is to balance them in a fair, respectful, and responsible manner.

This Code of Conduct includes many practical guidelines for doing the right thing. But no simple set of rules will address every situation. Good solutions require thoughtful evaluation and sound judgment, and often there is no single right answer.

When you have doubt about whether an action is appropriate, you should ask yourself the following questions, which can serve as a helpful guide.

Would my action be legal?

Your answer must be "Yes". Breaking the law, any law, is never the right course of action – even if it seems no one would get hurt or you believe no one would find out. There are no exceptions and no excuses. If you are not sure, ask. Ignorance is no protection. Get the facts so that you know you are on solid legal ground. Legal compliance is a great start. But as well as being legal, our actions should also be right and fair.

Is my action the "right thing to do"?

Consistently doing the right thing earns us the continuing trust of others. Our reputation for dealing fairly is critical for us to prosper in the global markets in which we compete.

Consider not only what you are doing but also how you are doing it. Are you being honest, fair and respectful? Would this behaviour protect Greenham's reputation as an ethical company?



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Would I undertake this action if I knew it would be reported in the local or global media?

Because of our market leadership and the strength of our brand and reputation, our actions often attract scrutiny from the media, regulators, customers, and consumer groups. Accurate reports of our behaviour should describe the actions of an honest, respectful, responsible corporate citizen. Would your action stand up to such scrutiny?

Would I be able to justify my decisions/actions to the senior management of Greenham and my colleagues?

Each of us wants to be proud of the work we do and the lives we lead. We want to be respected as important contributors to our communities. We should avoid any decision or action that we don't feel we could discuss openly and honestly with others.

These questions are designed to help you make ethical choices. This Code of Conduct gives you additional practical guidance, and can help you when in doubt about the right thing to do.

Failure to comply with these standards of Ethical Integrity will be considered a breach of the Code of Conduct and may result in disciplinary action, up to and including termination of employment.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Community Integrity:

Ethical Trading:

Ethical trading means conducting our business in an ethical manner and complying with all relevant laws to ensure that we do not cause harm to our employees, customers and suppliers, the environment, or the communities in which we operate.

Greenham understands our responsibilities as a corporate citizen and adheres to strict ethical trading standards in all areas of our business. Our business practices will comply with all relevant corporation, health, safety, employment, and equal opportunity legislation and are free from exploitation, intimidation, discrimination, and illegal labour practices.

Environmental Responsibility:

The nature and success of our business is inextricably linked with the protection and sustainability of the environment in which we operate. We will comply with all relevant environmental laws, rules, and regulations and we are committed to protecting natural ecosystems including water, soil, and air, by implementing environmentally safe and sustainable operating practices.

Food Quality and Safety:

The safety and quality of our consumable products are critical to maintaining the trust of our consumers, the reputation of our brands, the pride of our employees, and the respect of our communities.

Greenham is committed to providing safe and healthy fresh and prepared beef products that meet high quality standards. We comply with all relevant food and product safety laws and we strive to exceed these by following internationally recognised standards where they exist.

Greenham requires that each of our business units involved in the production or marketing of beef products apply strict and effective food safety standards.

Failure to comply with these standards of Community Integrity will be considered a breach of the Code of Conduct and may result in disciplinary action, up to and including termination of employment.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Reporting a Breach of the Code of Conduct:

Greenham Group Whistleblower Policy

As a Greenham employee, you are required to comply with this Code and report any conduct that may be in breach of this Code or any other Greenham policies or procedures.

Any reports of a breach will be taken seriously and investigated appropriately by Greenham. These investigations may be conducted internally or by an external third party and will consist of determining the truth and facts. Any intentionally false or malicious report(s) will be dealt seriously with appropriate consequences.

Employees can report any possible breaches:

1. via a portal accessible on the home page of the Greenham website, www.greenham.com.au and/or
2. In writing to a Board Member.

Each report shall be taken seriously and will be treated in strictest confidence in accordance with protections provided in the *Treasury Laws Amendment (Enhancing Whistleblowers Protections) Act 2019 (Cth)* known as the “*Whistleblowers Protection Act*”.

“Whistleblowers Protection Act” 2019 (Cth)

The purposes of the “*Whistleblowers Protection Act*” 2019 (Cth) are:

- To encourage and facilitate disclosures of improper conduct by senior managers and others; and
- To provide protection for:
 - persons who make those disclosures; and
 - persons who may suffer reprisals in relation to those disclosures; and
 - to provide for the matters disclosed to be properly investigated and dealt with

The Act excludes disclosures of a personal work / grievance nature, including such matters as interpersonal conflicts, promotions, demotions, terms and conditions of employment disciplinary actions, etc.

These procedures are to be used only when an employee or member of the public wishes to make a disclosure about improper conduct or about detrimental action taken against a whistleblower, and seeks the protections afforded by the Act.

For a disclosure to be a protected disclosure it should be made directly to the Company that it concerns, however, disclosures may also be made directly to relevant external bodies, including Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), Australian Federal Police (AFP), a Commonwealth authority prescribed to accept such disclosures or a legal practitioner for the purposes of obtaining legal advice or representation in relation to the relevant disclosure.



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

General Information

Version	V2 - including employment practices and updating the whistleblower policy
Approved by	Managing Directors
Responsible Policy owner	Group Human Resources Manager
Contact area	Human Resources
Commencement date	1 st December 2019
Date approved	25 th January 2019
Review	Every year unless required earlier

Related Company policies:

- Greenham Protection of Employee Data Policy
- Greenham IT Policy
- Occupational Health & Safety Policy
- Greenham – Health safety and Environmental Management System
- HWG HSEMS – 36.1 EEO and Anti Bullying Policy and Procedure
- HWG HSEMS – 11 Drug & Alcohol Company Policy
- HWG HSEMS – 34.1 Environmental Management Policy
- Greenham Quality Assurance and Management System

Related Legislation and Regulation:

- Corporations Act 2001(Cth)
- Competition and Consumer Act 2010 (Cth)
- Occupational Health and Safety Act 2004 (Vic)
- Work Health and Safety Act 2012 (Tas)
- Environment Protection Act 1970 (Vic)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Treasury Laws Amendment (Enhancing Whistleblowers Protections) Act 2019 (Cth)
- Australian Privacy Provisions
- Data and Privacy Protection Act 2014 (Vic)
- Personal Information Protection Act 2004 (Tas)

<https://www.oaic.gov.au/privacy-law/privacy-act/notifiable-data-breaches-scheme>



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY

Background:

As an employee of Greenham you are an advocate of the mission and values upon which our Code of Conduct is based. We all share the responsibility to bring the mission, core values and this Code of Conduct to life in our daily work.

The Greenham Code of Conduct is designed to promote positive and ethical behaviour and interactions at all level of professional activity. While all employees are expected to abide by the initiatives laid out in the Code, this is not intended to be comprehensive. You should exercise personal discretion and common sense, and if you are unclear at any time as to the correct course of action which is consistent with the values of the organisation, you should consult your manager or a member of the Greenham leadership team.

The observance of the standards identified in the Code of Conduct is a condition of employment for all Company employees. In recognition of this, you are asked to indicate your understanding and acceptance of the information above by signing the attached page and returning it to your manager.

Failure to comply with these standards of Personal, Workplace, Community and Ethical Integrity will be considered a breach of the Code of Conduct and may result in disciplinary action, up to and including termination of employment.

Declaration

I have read, understood, and accept my obligations as an Greenham employee as detailed in the Greenham Code of Conduct and I undertake to abide by the Code whilst an employee with Greenham.

I understand a breach of the Code of Conduct may result in disciplinary action, up to and including termination of employment.

Name: _____

Signature _____

Date ____/____/____



INTEGRITY • SAFETY • PEOPLE • IDEAS • COMMUNITY