

CODE OF CONDUCT POLICY

Purpose:

Our employees contribute to the success of our organisation and that of our Clients. VVME Central Agri Group (the Company) fully endorse that all employees are not deprived of their basic human rights. Furthermore, our employees have an obligation to the Company, our Clients and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and Client trust.

The purpose of the Company's Code of Conduct is to:

- Encourage positive behaviours within the workplace;
- Provide guidance to all employees on the Company's values and expectations while acting as a representative of the Company;
- Promote a common minimum standard of ethical behaviour, standards and expectations across the Company; and
- Raise employee awareness of acceptable and unacceptable behaviour and provide a means to assist in avoiding any real or perceived misconduct.

Scope:

This policy applies to all employees, including:

- Full-time, part-time, casual, or Labour-Hire;
- · Contract or commission workers; and
- Volunteers, vocational and work experience placements.

It applies to employees whilst:

- At the Company premises;
- Attending work-related interactions with fellow employees, and with clients, candidates and other stakeholders;
- Fulfilling work-related obligations;
- At any stakeholder premises; and/or
- At Company sponsored or funded functions or activities during and/or outside working hours.

Other actions by employees outside working hours may also fall within the scope of this policy if there is an impact on the employee's ability and/or suitability to do his/her job or the actions bring the Company into disrepute.

Description:

The aim of this policy is designed to foster a work environment that is positive, diverse and free from inappropriate, unethical and unlawful conduct. This policy is written as a set of general principles in employment and should be read in conjunction with the relevant Company policies as amended from time to time.



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Policy:

1. Business Integrity

1.1 Honesty, Integrity & Fairness

All employees shall endeavour to perform their duties and conduct business in a manner that is honest and of the highest integrity. The Company Employees strive to maintain our business relationships in a manner which is consistent with principles of respect for others, consistency and fairness. We aim to maintain standards that exceed industry and community expectations.

1.2 Reporting Concerns

The Company is committed to fostering an environment where concerns can be reported without fear of punishment. We will treat all reports seriously and will act appropriately and promptly.

1.3 Conflict of Interest Employees are to disclose any real or potential conflicts of interest when dealing with family, friends, or other related parties, entities or stakeholders on behalf of the Company. An employee shall make our interests known and seek approval before contracting with any of these parties where a conflict of interest may occur.

2. Business Practices

2.1 Financial Interests

The Company employees should avoid taking a specific financial interest, or participating in financial activities and arrangements, that could conflict with their obligations of fairness and integrity to the Company, or that could be perceived to do so.

2.2 Property & Ownership

Employees are to take responsibility for the protection and care of company assets including, but not limited to:

- cash, corporate cards & vouchers;
- plant and equipment, e.g. Cars, machinery, clothing;
- · company information; e.g computers, mobile phones and software; and
- intellectual property (e.g. copyright, trademarks, patents, registered designs and the right for the Company to have its confidential information kept confidential)

The Company aims to ensure that our actions in relation to Company property are honest at all times. If an employee believes that theft or damage is taking place in the workplace, employees should report it immediately to their manager/supervisor.

To avoid any misunderstanding, employees should remember to always:

- seek permission from a senior manager to take company property from the workplace and ensure its removal is documented and authorised;
- always use company property for what it was intended and not for personal use unless authorised;

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- never assume that damaged stock or goods is not wanted or not valuable to the company; and
- return all company assets when leaving the organisation.

Employees must also comply with their obligations in relation to intellectual property owned by third parties.

2.3 Recruitment and Selection

Our commitment to attract quality employees is reflected in our recruitment and selection processes, which are based on merit.

3. Health, Safety & Environment

The Company aims to provide a safe and healthy workplace for all employees. We aim to carry out our business activities in a manner consistent with applicable health, safety, and environmental laws and regulations for the wellbeing of our employees, contractors, visitors and customers. The Company and employees will work in line with all applicable health and safety legislation during all business dealings.

4. Equal Employment Opportunity (EEO) and Anti-Harassment

The Company aims to provide a work environment free from unlawful discrimination and harassment. Employees of the Company must also ensure their actions are working towards the common goal to provide a work environment free from unlawful discrimination, bullying and harassment. Refer to the Equal Employment Opportunities Policy and Bullying, Discrimination and Harassment Policy which operate in accordance with this policy.

5. Serious Misconduct

Serious misconduct is misconduct that is so serious that it fundamentally undermines the relationship of trust and confidence between the company and the employee. This is further covered in the Disciplinary Policy.

6. Questions and Reporting

6.1 Questions

If employees have any questions about a matter or issue they should consult with their manager. Should an employee require confidential advice or assistance, the Company may be able to provide assistance through the in house employee Assistance Program.

6.2 Reporting

All breaches of this Code of Conduct shall be reported immediately to the management of the Company. Individuals making complaints in good faith will be protected by this code of conduct and the Whistleblower Protection Policy, however, understand that disciplinary action may be taken where an allegation is malicious or vexatious.

Freedom of Association and Collective Bargaining

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Company respect employees right to join, from, or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, establish a constructive dialogue with their freely chosen representative and bargain in good faith with such representative.

Consequences of non-compliance

Failure to comply with the policy may result in consequences outlined in the Disciplinary Policy which may include termination of employment.