



Make a *Difference*

# SunRice Group Code of Conduct

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## Table of Contents

1.	Introduction.....	2
1.1	Our Purpose .....	3
1.2	Our Values.....	3
1.3	Our Behaviours.....	4
2.	Health, Safety and Environment .....	6
3.	Corporate Responsibility .....	7
4.	Employment .....	8
4.1	Alcohol and other drugs .....	8
4.2	Diversity .....	8
4.3	Confidentiality and Intellectual Property .....	9
4.4	EEO, non-discriminatory practices and the treatment of colleagues.....	11
4.5	Gifts and entertainment .....	12
4.6	Outside employment.....	13
4.7	Standards of Appearance (Dress Code and Uniform).....	14
4.8	Conflict of interest .....	15
5.	Good Governance Practices.....	15
5.1	Compliance with laws.....	15
5.2	Accounting for our resources.....	16
5.3	Competition and anti-trust.....	17
5.4	Anti-Bribery and Corruption .....	18
5.5	External Parties .....	19
5.6	Political contributions and activities.....	19
5.7	Insider trading .....	20
5.8	Speak Up! Policy.....	21
5.9	Relationships with communities and governments .....	22
6.	Company Resources .....	23
6.1	The use and protection of our resources and property .....	23
6.2	Computer use and social media .....	24
6.3	Donations and sponsorships .....	26
6.4	Privacy & information security .....	26
7.	Implementation.....	28.



### INTRODUCTION

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The SunRice Group Code of Conduct (“**Code of Conduct**”) is the set of standards, values and behaviours we expect in our business. Our business operates in a framework of relevant laws, regulations and internal policies, and whilst these do not govern all behaviour, it is important for everyone to understand exactly what we stand for and how we are expected to conduct our business.

Our Code of Conduct is integral to the way in which we work every day, and is linked to Our Strategy, Our Purpose, Our Values and Our Behaviours. This Code of Conduct applies to all directors, officers, employees and contractors of the SunRice Group (“**SunRice**” and “**SunRice Group**”) companies including SunRice, CopRice, Australian Grain Storage (AGS), Riviana, SunFoods, Solrice, Aqaba Processing Company (APC), Rice Research Australia Pty Ltd (RRAPL), Ricegrowers Singapore, Ricegrowers Vietnam (Lap Vo Dong Thap Food Company Ltd), Ricegrowers New Zealand Limited and Trukai, regardless of whether they are working in Australia or overseas (referred to below as “**you**” or “**your**”).

It is the responsibility of each and every employee to follow the Code of Conduct consistently and appropriately, and help others to do the same. You are required to:

- Promote the interests of the SunRice Group;
- Respect your co-workers, customers, suppliers and other service providers;
- Comply with laws regarding equal opportunity;
- Perform your duties with skill, honesty, care and diligence, using authority in fair and equitable manner;
- Abided by policies and procedures, instructions and lawful directions that relate to your employment and duties;
- Act within the laws of the countries in which you operate.

### 1.1 OUR PURPOSE

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With our roots in Australia’s food bowl, we’re proud to nourish discerning consumers around the world who trust the traceability and provenance of our globally sourced branded products.

### 1.2 OUR VALUES

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The SunRice Values have been developed in consultation with employees across the business; looking at our culture and capabilities and what it means to be a SunRice employee.

The SunRice Values are an important cultural building block; they are intended to guide our decisions when working towards our goals.

Each SunRice Value has a unique definition specific to our Group and one or more useful “asks” to help you make values-based decisions on a day-to-day basis.

#### *Integrity*

The value of *Integrity* has a dual meaning for SunRice. It represents the building and maintenance of relationships based on trust and respect; the making of decisions and taking action in an ethical, honest and fair manner. Integrity also refers to the firm protection of the quality of our resources, products and services.



## SunRice Group Code of Conduct

### *Dynamic*

As a global organisation headquartered in Australia, we have a strategic advantage which enables us to rapidly translate global consumer insights and demand into viable commercial decisions for the Australian and global markets. *Dynamic* refers to taking informed action with speed, and being flexible to market and environmental shifts. *Dynamic* encompasses a positive energy, where optimism is partnered with insight and builds momentum to thrive.

### *Innovative*

For SunRice, *Innovative* is about new and different ideas that will build value and make a material difference to the customer; about delivering on a need that our competitors either don't realise, can't deliver, or won't match our speed to market. Innovation isn't exclusive to new product development; it is about continually seeking efficiencies in processes, technologies and approaches that provide the customer, whoever they may be, with material value.

### *Collaborative*

*Collaborative* at SunRice is about the whole being greater than the sum of its parts, embracing a systemic approach to what we do. It is about valuing and leveraging diverse relationships and methodologies, and creating solutions far better than we could have achieved in isolation.

### *Community*

For SunRice, *Community* has a broad definition. Key to the SunRice "story" is the building of a global brand whilst remaining loyal to our rural Australian roots. *Community* represents the pride in our heritage and the care we demonstrate for the communities and environments in which we operate. *Community* is also about the care we demonstrate for each other, and those relationships we form through our brand.

## 1.3 OUR BEHAVIOURS

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High-performing organisations have clear and strategically linked performance measures that not only identify what individuals, teams and leaders must do, but how they must do it. In our journey towards becoming a high performing organisation, SunRice has developed a performance management system that aims to clearly articulate both the 'what' and the 'how' of performance.

This document outlines the critical behaviours that employees at SunRice are expected to demonstrate in the successful performance of their role; in other words, the how. These behaviours can also serve as a platform for SunRice in recruitment and selection activities, promotion opportunities and employee growth and development activities. And, of course, recognising and rewarding employees for high performance – both in what they do, and how they do it - reinforces and motivates our SunRice culture ambition – to be recognised for our high performance delivered by a positive, inclusive and accountable culture.

SunRice has identified eight behaviours that employees are expected to demonstrate in their day-to-day performance. These behaviours are underpinned by our SunRice Values, which guide our decision making processes towards achievement of our Strategic Goals. Each of the eight behaviours is described in further detail dependent upon the employee's role level within the organisation: Team Member, Leader, Senior Leader or Corporate Management Team Member.



## SunRice Group Code of Conduct

### *Collaborating and Influencing*

This behaviour is about truly understanding the benefits of working with others and one's own role in facilitating team performance; building productive relationships to further goals. At a leadership level it is about building networks, maximising diverse input and influencing and working through others to achieve strategy.

### *Decision Making*

This behaviour is about seeking, organising, measuring and analysing the right information and applying it to make both day-to-day and more business-wide decisions in line with one's role. At a leadership level it is about proactive receptivity to more complex and ambiguous information, devising strategy and building enterprise commitment.

### *Change Leadership*

This behaviour is about demonstrating a passion for continual improvement and personal accountability for managing change. At a leadership level it is about embracing innovation as a strategic pathway, continually seeking opportunities to grow, leading the enterprise to follow sound change principles and flourish through the complexities of change.

### *Developing Self and Others*

This behaviour is about gaining self-awareness and being accountable for one's own growth and development; embracing opportunities to learn. At a leadership level it is about developing accurate self-insight, understanding strengths and challenges and the impact of each; fostering a climate of continual positive learning.

### *Customer Focus*

This behaviour is about the demonstrated passion for customer service excellence; understanding who the customer is and responding to their needs. At a leadership level it is about maximising opportunities to deliver ahead of demand, putting the real and anticipated customer needs at the forefront of strategy development and achievement.

### *Commercial and Results Orientation*

This behaviour is about a systemic approach to business; understanding more than just one's job; taking a goal-oriented and aligned approach to all activities. At a leadership level, exemplifying a whole-of-business perspective, translating strategy into results, aligning culture and support systems to facilitate delivery.

### *Safety and Health Focus*

This behaviour is about ensuring a consistently and sustainably safe working environment; taking active ownership of SHE matters. At a leadership level it is about building a solid SHE foundation to support the physical, mental and emotional health and safety of talent across the organisation.

### *Personal Leadership and Alignment*

The behaviour is about personally aligning beliefs, values and behaviours with those of SunRice and taking personal accountability for holistic performance. At a leadership level it is about engendering respect, setting and modelling uncompromising standards and building and reinforcing an aligned culture.

The Code of Conduct also aims to foster a culture of fair and ethical behaviour and to encourage the reporting of unlawful and corrupt practices and other matters that might hurt the SunRice Group or its reputation. We are proud of our relationships with our workforce, customers, suppliers and other stakeholders and our



## SunRice Group Code of Conduct

contribution to the communities in which we operate and, at a broader level, the societies of which we are a part. Our values lie at the heart of our Code of Conduct.

## 2. HEALTH, SAFETY AND ENVIRONMENT

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Health and safety, social responsibility and environmental sustainability are fundamental to the way we do business.

We are guided by the principle that that all accidents and workplace illnesses and injuries are preventable. We are committed to being at the forefront of good work health and safety management practices and we aim to meet or exceed our obligations under work health and safety legislation and regulations wherever we operate.

Our overarching measure of success is that you go home safely to your families at the end of every day.

Workplace health and safety relies not only on technically sound plant, equipment and tools, but also on all people following our standards, policies, operating procedures and rules and being vigilant with respect to identifying hazards and unsafe practices and behaviour and reporting them; these are our expectations of you.

The SunRice Group is committed to understanding and minimising any adverse environmental impacts of our milling, processing and marketing activities, recognising that our key areas are post customer and consumer packaging and water and energy use.

We strive to efficiently use all resources, including preventing or reducing pollution and enhancing biodiversity protection. We aim to meet or exceed our obligations under environmental laws and regulations that apply to us. We will continually aim to identify, assess and effectively manage our environmental risks. We will seek to find solutions to and prepare for the risks associated with climate change, including measures to improve management of energy and greenhouse gas emissions.

The SunRice Group benchmarks the implementation and outcomes of safety, health and environment performance with that of other food and beverage manufacturers.

You must:

- ✓ learn and comply with the requirements of our mandatory health and safety standards, procedures and rules and support your colleagues to do the same;
- ✓ wear and use personal protective equipment as and when required;
- ✓ ensure you identify, assess and take steps to control health and safety hazards related to your work;
- ✓ immediately stop any work that appears to be unsafe, if appropriate to isolate the area and report it to your immediate team leader;
- ✓ handle and dispose of all materials properly, safely and lawfully;
- ✓ make sure you know what to do if an emergency occurs at your workplace and that visitors are familiar with emergency procedures;
- ✓ report to your team leader any accident, injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment (never assume that someone else will report a risk or concern and that you therefore do not need to report it); and
- ✓ maintain high standards of personal hygiene in and around food processing areas and abide by relevant dress standards (e.g. all jewellery other than a plain wedding band must be removed when in designated areas).
- ✓ make sure when travelling as part of your employment you read, understand, and follow the SunRice Group Travel Policy.





### 3. CORPORATE RESPONSIBILITY

The SunRice Group will strive to ensure that all products and supplies we use are sourced in an ethical, responsible and sustainable manner and from sources and suppliers whose practices towards Corporate Social Responsibility align with that of the SunRice Group.

The below elements define the non-negotiable minimum standards that we ask our suppliers and their sub-tier suppliers, to respect and to adhere to when conducting business with the SunRice Group.

SunRice expects the Supplier to adhere to all applicable laws and regulations and strive to comply with international and industry standards and best practices.

SunRice fully supports the United Nations Framework and Guiding Principles in Business and Human Rights and expects the Supplier to respect all human rights, including labour rights, throughout its business activities. As a minimum:

- **Child Labour:** The SunRice Group will not tolerate child labour as defined by ILO and United Nations Conventions and/or by national law and expects our business partners to adhere to the one standard which is most stringent.
- **Bonded Labour:** the SunRice Group will not tolerate any form of forced labour and related practices, such as lodging deposits or the retention of identity documents from personnel upon commencing employment. The use of corporal punishment, mental or physical coercion and verbal abuse is forbidden.
- **Serious Risk to Life and Limb:** The SunRice Group expect our business partners to establish and follow a clear set of regulations and procedures regarding occupational health and safety. Business relations between suppliers and production facilities may under no circumstances be entered into with production facilities where serious risk to life and limb has been found.
- **Legal Wages:** Wages paid for regular working hours, overtime hours and overtime differentials shall meet or exceed legal minimums or industry standards whichever, is more stringent in the relevant jurisdiction. The SunRice does not accept illegal, unauthorised or disciplinary deductions from wages.
- **Accurate Records:** The SunRice Group expects Suppliers and production facilities to maintain complete, true and accurate records, including in relation to production facilities, products supplied, production status, payment, and working hours, and must not falsify any records.
- **Bribery/Threats:** The SunRice Group will not tolerate any types of bribery or attempted bribery, mental or physical threats or attacks made by Suppliers or production facility management towards third party auditors or SunRice representatives. All employees and third parties must comply with the SunRice Group Anti Bribery and Corruption Policy and related Policies at all times.
- **Working Hours:** Working Hours must comply with applicable local laws or industry standards, whichever affords greater protection.
- **Observed continual coercion or harassment of workers:** The SunRice group will not tolerate any type of coercion, physical discipline or harassment of workers.
- **Unauthorised Subcontracting:** Orders for the SunRice Group must exclusively be completed in the production facilities specified in the product contract. SunRice must immediately be informed about any plans for changes or additional production facilities. Unauthorised subcontracting must be prohibited in all circumstances.
- **Freedom of Association:** Employees have a right to freedom of association and to bargain collectively



## 4. EMPLOYMENT

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### 4.1 ALCOHOL AND OTHER DRUGS

In support of our fundamental health and safety principles, being environmentally responsible and supporting our host communities, all SunRice Group workplaces are to be free from the use of alcohol and illegal drugs and the misuse of legal drugs.

While at work or when conducting SunRice Group business, you must be able to function at an appropriate level of performance and not be impaired by illegal or legal drugs, including alcohol.

Our separately published *Alcohol and Other Drugs Policy* and related program clearly explain our standards and expectations and a procedure for testing for alcohol and other drugs as part of our activities to achieve health, safety and environmental objectives.

You must:

- ✓ report to work fit and ready to carry out your duties free from the influence of alcohol and other drugs;
- ✓ advise your immediate team leader of any prescription drugs you are taking that might impact upon the safe and effective performance of your work;
- ✓ cooperate with our alcohol and other drugs testing program; and
- ✓ understand and otherwise comply in all respects with our separately published *Alcohol and Other Drugs Policy* as well as our *Motor Vehicle Policy*.

You must not:

- ✗ undertake any work, including driving to and from work and attending work functions, when you are impaired by alcohol or other drugs, whether they are legal, prescribed or illegal;
- ✗ consume, offer or make available to any other person alcoholic beverages or other drugs (legal, prescribed or illegal) at any SunRice Group site or office.
- ✗ possess, use or transfer alcohol or illegal drugs or other illegal substances on our premises; nor
- ✗ ignore a case of substance abuse if you witness one.

### 4.2 DIVERSITY AND INCLUSION

We have a strong commitment to workplace diversity and inclusion. We recognise that the wide array of perspectives resulting from a workplace that is diverse and inclusive in gender, age, ethnicity, cultural background, sexual orientation, religion, physical and mental ability, socio-economic status, thinking styles, education and experience promotes fresh ideas, creativity and innovation and benefits SunRice Group's employees, shareholders, customers, suppliers and other stakeholders.

The appointment of a diverse and inclusive group of well qualified employees, senior management and Board members maximises the potential achievement of our goals.

The Board of Directors has a particular focus on supporting diversity throughout the organization, particularly at senior levels.

Our separately published *Diversity and Inclusion Policy* and programs give practical effect to our commitments.





## SunRice Group Code of Conduct

If you are in a leadership position that carries responsibility for relevant decisions relating to our *Diversity Policy*, you must:

- ✓ recruit for employment from a diverse pool of candidates in a manner that promotes diversity for all positions, including senior management and the Board of Directors;
- ✓ review succession plans to ensure an appropriate focus on diversity;
- ✓ identify and have regard to specific factors in recruitment and selection processes to encourage diversity; and
- ✓ manage programs to develop a broader pool of skilled and experienced senior management and Board candidates, including, workplace development programs, mentoring programs and targeted training and development.

### 4.3 CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Everything you produce for the SunRice Group or in the course of your work for the SunRice Group that has the capacity to be stored in physical or electronic form, is our property.

Our property includes our intellectual property. The reference to our Intellectual property means all our intellectual proprietary rights, whether they are registered or unregistered and whether they exist under statute, at common law or in equity throughout the world including (without limitation):

- all trademarks, trade names, logos, symbols, get up, brand names or similar rights, registered or unregistered designs, patents, copyright, circuit layout rights, trade secrets and the right to have confidential information kept confidential; together with
- any application or right to apply for any of these rights.

In the course of your work, you may come across information or knowledge that is particularly sensitive or confidential. This may include our information or that of a customer, employee, prospective customer or competitor.

Typically, any information (written or oral or recorded electronically or by any other means) of a commercial, operational, technical or financial type, including information relating to any process, software, system, business opportunities, research, financial and sales data, pricing and trading terms, evaluations, opinions, interpretations, incentive payment systems, employees' terms and conditions of employment, the identity of customers and prospective customers or their requirements, the identity of key customer and prospective customer contacts, sales and marketing techniques, intellectual property, inventions (e.g. any discovery, idea, development, process, plan, design, formula, specification, program, or other matter or work, including improvements) and any trade secrets of the SunRice Group is regarded as confidential.

Our confidential information is a valuable part of our intellectual property.

You must not disclose or share any of our information with any person who is not authorised by the SunRice Group to receive it. You must exercise care and diligence to protect our confidential information, including protecting it from deliberate or accidental disclosure.

If you are ever placed in a position where you believe you are required to disclose confidential information by law or court order, you must immediately notify the General Counsel of such belief, giving the reasons why you have formed the belief, and not disclose the confidential information until the SunRice Group has an opportunity to consider those reasons and take such action as we consider necessary in the circumstances.



## SunRice Group Code of Conduct

Your obligation to protect our confidential Information continues after you cease to be employed or engaged by the SunRice Group. At the cessation of your employment or engagement, you must return all confidential information in your possession to the SunRice Group.

The SunRice Group will not hire a person in order to obtain the person's specific knowledge of a former employer's confidential information or place a new or existing employee in a position that would require the person to disclose or use a former employer's confidential information.

You must keep all confidential information confidential which means you must:

- ✓ only use and disclose confidential information so far as it is necessary for the proper and authorised performance of your duties;
- ✓ maintain and take all steps necessary to maintain all confidential information in strictest confidence;
- ✓ ensure that proper and secure storage is provided for any confidential information in documented or other readable form;
- ✓ take all reasonable precautions necessary to prevent accidental disclosure of any of the confidential information; and
- ✓ if at any time you believe that you are obliged by law to disclose confidential information, immediately notify the General Counsel of such belief, giving the reasons why you have formed the belief and not disclose the confidential information until we have an opportunity to consider those reasons and take such action as we consider necessary in the circumstances.

You must not:

- ✗ use for your own benefit, or disclose to, or use for the benefit of any other person, firm or corporation, or use to the detriment of the SunRice Group, any confidential information.

You must assist SunRice in protecting our intellectual property which means you must:

- ✓ regard, both during and after your employment or engagement, the information obtained by participating in the development of processes or products for the SunRice Group, or the results of such work, as our property;
- ✓ advise us of the results of all work done during or outside of working hours that relate to the business or operation of the SunRice Group to enable us to protect our interests and rights in, relating to or resulting from such work;
- ✓ assist us to obtain patents, copyrights or other protections of our intellectual property in the name of the relevant company within the SunRice Group; and
- ✓ make sure that your conduct, actions or work product do not infringe any third party intellectual property rights and, if you are ever in doubt about potential infringements, seek advice from our Company Secretary or General Manager, People and Culture.
- ✓ Promptly advise your team leader or a member of the People and Culture Team if you receive or anticipate receiving any financial remuneration, through error or miscalculation that you should not be entitled to. Overpayments require the employee to return funds.
- ✓ Promptly advise a member of the legal team if you believe you have gained access to personal information or confidential information mistakenly, or if you believe a data breach has occurred.



## SunRice Group Code of Conduct

You must not:

- ✗ bring to the SunRice Group any confidential information, including computer records, from prior employers or principals.

### 4.4 EEO, NON-DISCRIMINATORY PRACTICES AND THE TREATMENT OF COLLEAGUES

The SunRice Group is committed to the principle of equal employment opportunity and to providing a productive workplace in which you can work free of unlawful discrimination and harassment.

Our separately published policy entitled *Equal Employment Opportunities Policy (Eliminating discrimination, harassment and bullying)* outlines our commitment to providing equal employment opportunities and eliminating unlawful discrimination and harassment in the workplace. The policy is intended to provide you with information to help the SunRice Group achieve its policy objectives by outlining expectations of behaviour and procedures for dealing with complaints.

It is the policy of the SunRice Group that all persons in the workplace be treated on the basis of merit and according to their skills and abilities. This will include, but is not limited to, matters involving: recruitment, selection, transfers, promotions, performance reviews, training and development, supervision and management of staff, counselling, disciplinary procedures and termination of employment; and remuneration practices and benefits.

An employee's gender, marital status, pregnancy, parental/family responsibilities (including breastfeeding needs), race, age, disability, sexual orientation, transgender, political/religious beliefs, trade union activity/inactivity or physical appearance will not form the basis of employment decisions.

The SunRice Group believes that all employees have a right to work in a productive environment in which discriminatory conduct or harassment of others is not tolerated. SunRice will not tolerate any type of conduct that violates the basic rights of another person and /or any action that is considered to be disruptive to others in the workplace including disorderly, anti-social or unlawful behaviour.

Unlawful discrimination and harassment can have many negative effects in the workplace. Employees who are subjected to or witness this type of treatment often feel intimidated or anxious at work. Harassment is any uninvited or unwelcome behaviour that offends, humiliates or intimidates another person, whether or not that effect is intended.

Harassment may occur as a single act, or as a series of incidents, persistent innuendoes or threats. It can take many forms; it may be silent or loud, subtle or openly hostile; it can be private or public. Harassment may take the form of general bullying, or be specifically aimed at people with particular or different characteristics. The latter type of harassment may amount to discrimination which is unlawful. Bullying is also unlawful under occupational health and safety legislation.

Through responsible management, the SunRice Group will endeavour to prevent discrimination and harassment from occurring in the workplace.

Victimisation may occur when a person victimises another person who lodges a discrimination or harassment complaint or takes certain related actions. Victimisation of others is unlawful. The intention of such protective measures is to ensure that a person, who wants to use or does use their statutory rights to protect themselves against discrimination or harassment, is not further disadvantaged by other detriments being imposed on them. We will not tolerate any such victimisation.

You must:

- ✓ act with fairness and respect and with concern for individual rights in all your dealings with other people, consistent with our Code of Conduct;



## SunRice Group Code of Conduct

### Group

- ✓ ensure employment-related decisions, including recruitment, selection, transfers, promotions, performance reviews, training and development, supervision and management, counselling, disciplinary procedures, remuneration and separation are based solely on merit and legitimate business considerations;
- ✓ familiarise yourself with and act in accordance with local legislation and cultural considerations that may impact workplace decisions and actions;
- ✓ understand and comply with our separately published policy entitled *Equal Employment Opportunities Policy (Eliminating discrimination, harassment and bullying)*; and
- ✓ participate in any investigation conducted in relation to discrimination, harassment, bullying or victimisation as and when required by the SunRice Group.

### You must not:

- ✗ discriminate or tolerate discrimination against a person or make jokes on the basis of the person's gender, marital status, pregnancy, parental/family responsibilities (including breastfeeding needs), race, age, disability, sexual orientation, transgender, political/religious beliefs, trade union activity/inactivity or physical appearance;
- ✗ behave in a manner that could reasonably be perceived as offensive, insulting, intimidating, malicious, humiliating, harassing or bullying or engage in sexual harassment (e.g. unwelcome sexual advances, requests for sexual favours, inappropriate or unwelcome physical contact or sexual suggestions, distribution or display of sexual material, including inappropriate pictures or cartoons) - if you are unsure of the meaning of these behaviours, refer to our *Equal Employment Opportunities Policy (Eliminating discrimination, harassment and bullying)* or ask a People and Culture team member for help;
- ✗ spread malicious rumours or use our resources to transmit derogatory, discriminatory, abusive or harassing material; nor
- ✗ victimise a person who has complained of the kinds of behaviour described above.

## 4.5 GIFTS AND ENTERTAINMENT

You must exercise the utmost care when offered gifts, hospitality or entertainment in order to protect your reputation and our reputation against allegations of improper behaviour and to ensure that relevant laws are not breached. Accepting gifts, hospitality or entertainment must always be done in accordance with the law and local business practice. In principle, they should only be accepted if they are occasional, not intended to influence decision making, of modest value and in accordance with this Code and the Gifts, Benefits and Hospitality Policy.

Determining what is occasional and modest is a matter of-judgement. As a guide, the higher the monetary value of the gift, hospitality or entertainment, the greater the level of transparency that is required.

Gifts, hospitality and entertainment of any kind must not be solicited from a supplier, customer, business partner or other party with whom the SunRice Group conducts business.

As a general rule, offers to you of sponsored travel are to be rejected (frequent flyer redemption travel is not considered an offer). If there is a valid business purpose to attend an event or function, the SunRice Group will pay for any travel and/or accommodation costs. Where practical alternative means of travel or attendance at the SunRice Group's expense are not available, you should refer the matter to your General Manager for consideration. Sponsored travel is not made acceptable by being undertaken during a period of leave.



## SunRice Group Code of Conduct

### Group

You must:

- ✓ report any gift, hospitality or entertainment accepted, rejected or returned, whether directly or through an intermediary to the General Manager of your department or a member of the SunRice Legal Team;
- ✓ ensure that gifts, hospitality and entertainment are modest and comply with applicable laws, regulations, and local customs; use good judgement in deciding what is *modest*;
- ✓ politely decline any offer that is not in line with our Code of Conduct, Gifts, Benefits and Hospitality Policy and our management practices;
- ✓ seek approval for any gifts, hospitality and entertainment before you give or receive them, from your General Manager;
- ✓ clearly communicate our requirements on accepting gifts, hospitality and entertainment at the beginning of any new business relationships, especially where cultural norms may be different from those outlined in our Code of Conduct;;and
- ✓ assess and avoid the potential for a conflict of interest when offering or accepting gifts, hospitality or entertainment.

You must not:

- ✗ request or imply that you would accept a gift or hospitality or entertainment of any kind from a supplier, customer, partner or other party with whom we conduct business;
- ✗ keep a gift or accept hospitality or entertainment above a modest value without obtaining authorisation from the Company Secretary; nor
- ✗ exchange gifts, hospitality or entertainment with our competitors' representatives; this may create an actual or perceived conflict of interest or be perceived as anti-competitive behaviour.

### 4.6 OUTSIDE EMPLOYMENT

As a general rule, employees are precluded from working for or having an interest in any organisation or activity involving:

- a competitor, supplier or customer of the SunRice Group; and
- any organisation affiliated with the above.

Paid employment of any kind (including self-employment, consulting, contracting or any other income generating activity) by full time employees of the SunRice Group, outside the SunRice Group, whether directly or through a company or other entity, must be disclosed to and approved by the Chief Executive Officer. Approval must be obtained in writing with the following details provided:

- the name and business activities of the employer;
- the position and nature of the work; and
- the hours of work.

Approval will be subject to the alternate employment not impacting your employment with SunRice and the SunRice Group reserves the right not to approve a request or withdraw an approval or ask the employee to cease any association with work activities outside of their employment with the SunRice

Group upon being requested to do so. In making its decision, the SunRice Group will have primary regard for workplace health and safety and the interests of the SunRice Group.

#### *Outside Directorships*

The consent of the Chief Executive Officer is required prior to any employee accepting or continuing an



## SunRice Group Code of Conduct

### Group

appointment as a Director or consultant to boards or government instrumentalities, or engaging in activities of a similar nature in any organisation which is not part of the SunRice Group. Employees wishing to occupy Directorships with their family company do not need approval, provided the company is not a supplier or customer of the SunRice Group. Notwithstanding, employees must advise the Chief Executive Officer of family company Directorships or partnerships.

You must:

- ✓ Seek approval in writing from the Chief Executive Officer to engage in any outside employment, including as a director or consultant or office holder to boards or government instrumentalities; in doing so, provide the following details:
  - The name and business activities of the employer;
  - the position and nature of the work; and
  - the hours of work; and
- ✓ abide by any decision that is made.

You must not:

- ✗ work for or have an interest in any organisation or activity involving a competitor, supplier or customer of the SunRice Group or organisation affiliated with any of these.

### 4.7 STANDARDS OF APPEARANCE (DRESS CODE AND UNIFORM)

The SunRice Group expects you to attend and conduct work in the acceptable standard of appearance applicable for the area that the work is being conducted. You are required to comply with their site specific dress code requirements.

All production related staff are to comply with the highest standards of personal hygiene in relation to the standards of dress. Uniforms, footwear and personal protective equipment must be worn as directed and all jewellery other than a plain wedding band must be removed when in designated areas of the site.

The SunRice Group expects all office-based staff and customer-facing staff to present a clean, neat, tidy and professional image. For guidance, on suitable dress standards, smart business attire is recommended. However, please observe your colleagues for suitable dress standards or ask your team leader if you are unsure.

Team leaders are required to brief new employees during their induction processes regarding local requirements. Further information can be provided by the local team leader or People and Culture Business Partner.

Some offices and sites allow staff to dress more casually on limited occasions, e.g. casual Friday. The requirement to present a clean, professional and appropriate image remains, therefore, SunRice does not permit ripped, dishevelled or revealing clothing, athletic and/or beach wear, hats or caps worn inside, or similarly inappropriate clothing.



#### 4.8 CONFLICT OF INTEREST

A conflict of interest may arise if and when a person in a decision-making position participates in an activity or acquires another interest or loyalty that jeopardises, or could jeopardise or be perceived as jeopardising the person's judgement, objectivity, impartiality or independence.

We expect that you will at all times perform your duties and conduct yourself conscientiously, with integrity and honesty and in the best interests of the SunRice Group. To do this means that your actions at work and in your personal time should not in any way conflict with your responsibilities to the SunRice Group or compromise, or appear to compromise, the quality of your work, your performance of and commitment to your work or your ability to make impartial business decisions for or on behalf of the SunRice Group.

You must:

- ✓ conduct all business relationships in a professional, impartial and competitive manner;
- ✓ declare family relationships where we are or may be considering employing or contracting with a person to work with you, report to you or whom you may report to;
- ✓ promptly advise your team leader in writing of any outside activities, financial interests or relationships that may involve you either in an actual conflict of interest or the perception of one; and
- ✓ promptly excuse yourself from any decision-making process where you have an interest that influences, or may be perceived as influencing, your ability to make an objective decision and to fulfil your responsibilities to the SunRice Group.

You must not:

- ✗ use your position or knowledge or our assets, identity or standing for your own personal advantage or that of others;
- ✗ work for or provide advice or consulting services to a competitor, supplier or customer of the SunRice Group;
- ✗ run any other business or be involved in other arrangements in your free time which will compete with us; nor
- ✗ engage in financial investments associated with competitors, suppliers or customers other than nominal investments in public companies, or arrangements for ordinary consumer transactions on standard commercial terms.

## 5. GOOD GOVERNANCE PRACTICES

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### 5.1 COMPLIANCE WITH LAWS

The SunRice Group will at all times comply with applicable laws. There are laws, codes, standards and regulations that govern our business transactions and practices in all jurisdictions in which we operate, which may vary from jurisdiction to jurisdiction. Some of these are the subject this Code of Conduct.

Whether contained in this Code or not, you must be aware of the laws, codes, standards and regulations that govern your conduct and ensure that you do not engage in offending conduct. The consequences of not doing so might include reputational damage to you and the SunRice Group and result in termination of your employment or engagement, fines and/or civil or criminal charges.



## SunRice Group Code of Conduct

There are laws, codes, standards and regulations that govern our business transactions and practices in all jurisdictions in which we operate, which may vary from jurisdiction to jurisdiction. Some of these are the subject of our Code of Conduct and this policy. Whether contained in this Code of Conduct or not, you must:

- ✓ be aware of and comply with the laws, codes, standards and regulations that govern your conduct.

### 5.2 ACCOUNTING FOR OUR RESOURCES

The SunRice Group will comply with the accounting and financial reporting rules and regulations in all jurisdictions applicable to us.

All data relevant to our business activities, whether financial or non-financial and in whatever form it is created and maintained (e.g. document or electronic form) must accurately reflect the underlying transactions and activities. Falsifying, concealing, altering, destroying or otherwise tampering with information, or creating misleading information will not be tolerated by us, and may also be unlawful.

All transactions must be properly authorised, in accordance with the authorities delegated by the Board of Directors, and accurately and completely recorded in the relevant accounts and records as required by law and our internal accounting rules. The Delegations of Authority Matrix can be found on the Company intranet under 'My Compliance' and 'SunContract'.

Authority under the Delegations of Authority authorises particular people to make decisions regarding financial spend up to their authorisation limit.

The Remuneration Delegation Framework also outlines the authorization of particular decisions regarding remuneration spend. The Remuneration Delegation Framework can be found under 'My Compliance' and 'SunPolicy', 'People and Culture'.

#### **This is separate from the legal obligation of execution and binding the Company.**

The only people authorised to bind the company are those specified in s 127 of the Corporations Act, being Company Directors or the Company Secretary, or those specifically authorised by the board through a power of attorney. So while you may be authorised to commit the resources of the company in the form of spend, you may not be authorised to legally bind the company. If you are unsure of your authorisation, contact the General Counsel or a member of the Legal Team.

Once created, data must be securely stored and only disposed of in accordance with applicable laws and regulations and our internal information management policies.

Senior financial officers and others responsible for the accuracy of financial reporting have an additional responsibility to ensure that adequate internal controls exist to achieve truthful, accurate, complete, consistent, timely and understandable financial and management reports.

You must:

- ✓ keep accurate, complete, true and up-to-date books, records, accounts and documentation;
- ✓ record work time, absenteeism and financial transactions relating to the SunRice Group accurately and in accordance with generally accepted accounting standards;
- ✓ protect our official records from unauthorised access, interference or use;
- ✓ be alert to ensure that no undisclosed or unrecorded account, fund or asset is created or maintained;
- ✓ cooperate fully with our internal and external auditors;



## SunRice Group Code of Conduct

Group

- ✓ demonstrate integrity and accuracy when submitting and approving expense claims;
- ✓ retain documents and records in accordance with the applicable laws and our internal information management practices;
- ✓ return or transfer the custody of all relevant records if you change your job within the SunRice Group or if you leave the SunRice Group for any reason; and
- ✓ immediately report any actual or suspected irregularities or weaknesses in relation to auditing, accounting or internal controls to your team leader, the General Counsel or to the Speak Up! Hotline.

You must not:

- ✗ commit the SunRice Group to financial obligations that are beyond the scope of your delegated authority;
- ✗ Purport to bind the company to contractual or other obligations, unless you are a person specified in s127 of the Corporations Act or have been expressly authorised to do so by a resolution of the Board of Directors;
- ✗ deliberately falsify records or make false or misleading entries, including by omission, in any reports, records, expense claims or other financial or non-financial records or conceal or tamper with our records or documents; nor
- ✗ influence or allow others to do anything that would compromise the integrity of our records or reports or circumvent or compromise our review and approval processes.

### 5.3 COMPETITION AND ANTI-TRUST

Most countries in which we operate have developed competition (or antitrust) laws that are designed to prohibit a range of practices that restrict trade or free and fair competition, such as price fixing, market sharing, bid rigging or abuses of a dominant position.

The SunRice Group is committed to full compliance in Australia with the *Competition and Consumer Act 2010* (Cth), State fair trading laws and all applicable international competition laws.

We commit to actively cooperate with competition authorities, including with their enforcement of competition laws against those third parties who act in an anti-competitive manner towards the SunRice Group.

You should familiarise yourself with competition laws as well as the SunRice Group Competition and Consumer Law Policy (Found under 'My Compliance', 'SunPolicy', and 'Legal') and participate in relevant learning initiatives provided by the SunRice Group. When dealing with our competitors, customers, suppliers, business partners and other third parties with whom we do business, you must conduct yourself in a manner that does not breach competition laws.

You must not discuss competitively sensitive information with competitors. If you have any concerns about topics raised for discussion by a competitor, you should excuse yourself from the conversation and contact the SunRice Group's General Counsel.

You must:

- ✓ maintain independence of judgement in pricing, marketing and selling of our products;
- ✓ consider the appearance and implications of interacting with competitors, whether in a business or personal setting, and avoid any action which could imply unlawful coordination with competitors; and



## SunRice Group Code of Conduct

- ✓ contact our Company Secretary and/or General Counsel (and obtain approval as required):
  - before submitting any information to a competition authority,
  - before exchanging competitively sensitive information, directly or indirectly, with a competitor,
  - if inappropriate contact is initiated by a competitor,
  - if a complaint is made about the competitive behaviour of the SunRice Group,
  - if you suspect that a third party is acting in an anti-competitive manner toward the SunRice Group.

You must not:

- ✗ collude with a competitor by:
  - Fixing, raising, lowering or stabilising prices of goods sold or purchased;
  - fixing other competitive terms such as pricing formulae, discounts, margins, rebates, commissions or credit terms;
  - limiting production or agreeing to reduce or limit productive capacity;
  - rigging a bid or otherwise illegally coordinating bidding or tendering activities;
  - allocating markets, customers, suppliers or geographic territories,
  - boycotting any customer or supplier;
- ✗ obstruct a competition authority by providing false or misleading information, concealing or destroying documents or alerting any third party to the existence of an investigation;
- ✗ seek to obtain a competitive bid in appropriate circumstances; nor
- ✗ give one supplier's confidential business information (for example, proposed rates, winning bid information and the like) to another supplier.

### 5.4 ANTI-BRIBERY AND CORRUPTION

Most countries have laws prohibiting the making of offers or payments and giving of gifts and other things of value to government officials and private parties to influence their actions. Many countries have laws that also prohibit people and companies subject to their laws from engaging in corrupt conduct even when it is committed outside of the country.

Anti-bribery and corruption controls are particularly important to SunRice because the company is operating in multiple jurisdictions and extremely competitive markets. SunRice also enters into a greater number of third party relationships and is increasing its transactional volumes, workforce and scale of operations.

The potential risks of non-compliance with bribery and corruption legislation are significant and come with potential penalties which are substantial. In addition to the risk to SunRice's valuable reputation and brand, non-compliance can mean financial penalties and in some instances imprisonment.



## SunRice Group Code of Conduct

It is important for all employees to understand and comply with the Anti-Bribery and Corruption Policy and all related policies. The Policy applies to all legal entities that are part of SunRice, including all subsidiaries and affiliates. The Policy also applies to all third parties acting on behalf of SunRice such as distributors, suppliers and customers. SunRice expects that all its employees representatives and other third party associates worldwide will act in accordance with the Policy and observe and uphold the company's position on bribery and corruption.

In keeping with these laws, SunRice prohibits authorising, offering, giving or promising anything of value directly or indirectly (via a business partner) to a government official to influence official action or to anyone to induce them to perform their work disloyally or otherwise improperly.

Any proposed thing of value must meet all of the following criteria before it may be offered, promised or given to anyone:

- It is not offered, promised or given to influence or reward action taken by a government official or to anyone to perform work duties disloyally or otherwise improperly to reward that person for doing so, taking into consideration any other things of value given to the recipient in the previous six months.
- It is of an appropriate value and nature considering local custom, the position of the recipient and the circumstances, and would not cause embarrassment to SunRice.
- It serves only legitimate business purposes.
- It complies with the Gifts, Benefits and Hospitality Policy.

They must also be legal under local laws. Pre-approval may be required in certain circumstances..

The making of so called facilitation payments is prohibited by SunRice in line with the anti-corruption laws of various countries. Requests for facilitation payments must be reported to your team leader and the General Counsel immediately.

The health and safety of those working for SunRice is paramount. If a payment has been made as a result of a direct or associated imminent threat to health or safety of any SunRice employee, agency contractor or officer, or any accompanying person, it must be reported to a General Manager of SunRice immediately.

A breach of anti-corruption laws is a serious offence, which can result in fines for both SunRice and employees and the imprisonment of the employees. Even the appearance of the breach of these laws have a serious reputational impact on SunRice. A breach of SunRice's Anti-Bribery and Corruption Policy is also a serious offence which can result in disciplinary action including up to dismissal.

### 5.5 EXTERNAL PARTIES

SunRice cannot cause or authorise third parties to engage in conduct when acting on our behalf that we cannot engage in directly. Similarly, no such person or entity may be hired or otherwise partnered with if there is a material risk that they or it will violate applicable anti-corruption laws or prohibitions in SunRice Group policies.

### 5.6 POLITICAL CONTRIBUTIONS AND ACTIVITIES

The SunRice Group does not contribute funds to any political party, politician, elected official or candidate for public office in any country. We do express our views to governments on subjects that affect our interests and operations as part of our normal government relations. In doing so, we maintain our high ethical standards and we comply with all relevant laws.

We acknowledge your civil rights and that you may have political interests or affiliations and that you may become involved in political activities or events in your own time. These must not in any way infringe your



## SunRice Group Code of Conduct

### Group

obligations to the SunRice Group. You must never represent that your own political views or affiliations are those of or are supported or endorsed by the SunRice Group.

You must:

- ✓ when engaged in private political activities in your own time, make it clear that you are speaking or acting on your own behalf and not on behalf of the SunRice Group;
- ✓ conduct business dealings on behalf of the SunRice Group with any political party, politician, elected official or candidate for public office in any country in accordance with our Code of Conduct and all applicable laws and regulations governing corporate participation in public affairs and anti-corruption;
- ✓ seek approval from the Chief Executive Officer for involvement in any business-related activities organised by or on behalf of a political party or candidate and be transparent when undertaking such activities; and
- ✓ be mindful and respectful of the SunRice Group's reputation and how the public would perceive your actions when engaging with government officials.

You must not:

- ✗ give free or discounted use of our premises or equipment as an in-kind donation to a political party;
- ✗ pay wages or salaries of a SunRice Group employee working for a party or candidate during normal working hours;
- ✗ make a cash or an in-kind contribution or incur expenditure using a SunRice Group account to any political campaign, political party, political candidate or elected official or use charitable donations as a veil for a political payment; nor
- ✗ use your position in the SunRice Group to try to influence any other person to do any of the above.

### 5.7 INSIDER TRADING

Generally, inside information is material information about a company that is not generally available to the public. Whether information is material is judged by whether it would affect a reasonable investor's decision about whether or not to invest in the company.

Examples of possible inside information include:

- the financial performance of the SunRice Group or how we are tracking against our budget or forecasts;
- our winning or losing a significant supply contract; and
- news of a merger, acquisition or joint venture before it becomes public knowledge.

Whilst it is not an offence to possess inside information, in many countries it is a criminal offence to use such inside information to buy, sell or otherwise deal in securities or to encourage insider trading or to disclose inside information with a view to others profiting from it. If you possess inside knowledge, you should not advise or encourage another person (for example, a family member, a friend or family company or trust) to undertake insider trading or pass the information to another person if you know, or ought to know, that he or she may use the information to deal in securities.

It may also be a breach of your obligations of confidentiality to the SunRice Group to disclose information, irrespective of whether the person to whom you disclose it uses it for personal advantage.





## SunRice Group Code of Conduct

### Group

You must:

- ✓ keep SunRice Group information confidential;
- ✓ report any leaks or unauthorised disclosure of SunRice Group information, of which you become aware, to your team leader, the General Counsel or the Speak Up! Hotline;
- ✓ be careful with the information you talk about with other SunRice Group employees or contractors, including any confidential projects you are working on; and
- ✓ seek advice from the Company Secretary and/or General Counsel if you have any doubt about the propriety of any transaction in securities that you are contemplating.

You must not:

- ✗ buy or sell the securities of Ricegrowers Limited or any other company, either directly or through family members or other persons or entities, while you are aware of inside information, even if you believe you are not relying on this information;
- ✗ disclose inside information to anyone outside of the SunRice Group, including family and friends, unless it is appropriately authorised, documented and is necessary for our business activities;
- ✗ recommend or suggest that anyone else buy or sell the securities of any company, including Ricegrowers Limited, while you have inside information about the company;
- ✗ spread false or misleading information or engage in other activities designed to manipulate the price of publicly listed securities; nor
- ✗ trade in the shares of counterparties when you have access to inside information that, if it were made public, could reasonably be expected to affect the counterparty's share price.

### 5.8 SPEAK UP! POLICY

In support of our Code of Conduct, the SunRice Group has a separately published *Speak Up! Policy* designed to:

- encourage the reporting of wrongdoing that may cause financial or non-financial loss to the SunRice Group or damage to its reputation or harm others;
- establish effective reporting and investigation mechanisms;
- enable the SunRice Group to effectively deal with reports from Concerned Individuals in a way that will protect the identity of the Concerned Individual and provide for the security of the information provided; and
- protect Concerned Individuals against reprisal by any person internal or external to the SunRice Group.

By effectively implementing this policy and deterring improper conduct, the SunRice Group aims to support our Code of Conduct and:

- more effectively comply with all applicable laws;
- improve management practices, including financial and asset management;
- achieve a healthier and safer work environment and improve the morale of the workforce; and
- sustain our reputation as a good corporate citizen.

All reports will be taken seriously and be treated with confidentiality to the maximum extent possible. If the Concerned Individual(s) do not wish the SunRice Group to disclose their identity, the SunRice Group will not disclose their identity unless it is required by law or in order to conduct legal proceedings.

There is also an external reporting service which is confidential.



## SunRice Group Code of Conduct

The SunRice Group acknowledges that a Concerned Individual usually only decides to raise concerns after careful thought. Provided those concerns are genuine and raised in good faith, the Concerned Individual will be protected from any and all forms of reprisal and, provided the Concerned Individual has not engaged in the wrongdoing, from adverse action and will be supported by the designated Integrity Officer within the SunRice Group.

The SunRice Group will not tolerate harassment, victimisation or discrimination of or against Concerned Individuals or witnesses or their relatives or colleagues and will deal with such occurrences in accordance with the SunRice Group's relevant policies.

If you think a decision or action is out of step with our values, Code of Conduct or any SunRice policies or you have a concern about how to comply with the Code of Conduct, any SunRice Group policy or procedure or any other SunRice Group requirement or the law, you have a right and a responsibility to raise that concern.

You are encouraged to:

- ✓ report any breaches of or behaviours that are inconsistent with the Code of Conduct or this policy or other SunRice Group policies to your team leader, the Integrity Officer or the Speak Up! Hotline;
- ✓ anticipate and plan in advance to guard against new or potential circumstances where corruption might occur or have the potential of occurring;
- ✓ acknowledge the necessity of compliance with anti-corruption laws when setting key performance indicators;
- ✓ immediately report any corruption, fraud or competition concerns to your team leader, the Integrity Officer or the Speak Up! Hotline so that appropriate action can be taken; and
- ✓ cooperate with and participate in any investigation concerning improper conduct.

You must not:

- ✗ victimise, harass, or discriminate against Concerned Individuals or witnesses or their relatives or colleagues.

### 5.9 RELATIONSHIPS WITH COMMUNITIES AND GOVERNMENTS

#### *Communities*

The SunRice Group is connected to a wide range of communities across Australia and internationally. We are tied to local communities through employees, contractors, farmers, customers, consumers and governments and through community groups. Our long term success relies upon our ability to develop our relationships and work collaboratively and transparently with these host communities in a way that respects cultural diversity and acknowledges and considers community views and concerns related to our operations.

If your job involves business dealings with other countries, you must always be aware of and understand the norms, laws and customs of those countries and ensure that your behaviour reflects positively upon yourself and the SunRice Group.

We are involved in a range of community programs that aim to make a positive contribution by meeting people's basic nutrition needs or by supporting activities and initiatives that are good for the environment or a community's health and well being.



## SunRice Group Code of Conduct

### *Governments*

We respect the authority of governments wherever we operate and seek to maintain honest and open relationships with governments and their agencies and officials. We will fully cooperate with legitimate government investigations and inquiries.

You must comply with the laws and regulations in all jurisdictions applicable to us. If you are providing information to governments on our behalf, you must ensure that it is accurate and appropriate for the purpose it is provided. If you learn about a government investigation or inquiry, you should immediately inform the Company Secretary or the General Counsel.

You must:

- ✓ respect the cultures and business customs of the countries and communities in which we operate, provided they do not conflict with our Code of Conduct and applicable laws;
- ✓ seek to understand the concerns and expectations of communities in which we operate, which are relevant to our business, and consider them in your decision making;
- ✓ act truthfully, accurately, cooperatively and courteously when dealing with government officials and community leaders; and
- ✓ be alert to the corruption levels where you work or travel and stand firm against possible corruption.

You must not:

- ✗ authorise, offer, give or promise anything of value directly or indirectly to a government official or community leader in order to influence official action;
- ✗ attempt to obstruct or hinder the lawful collection of information, data, testimony or records by appropriately authorised government or regulatory officials;
- ✗ take action against any person who lawfully and properly cooperates with government agencies; nor
- ✗ intentionally favour individuals from one political, religious or ethnic group on the basis of their membership of that group (other than where such action supports our approved or legally required program of positive action, e.g. to assist historically disadvantaged groups in the community).

## 6. COMPANY RESOURCES

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### 6.1 THE USE AND PROTECTION OF OUR RESOURCES AND PROPERTY

We will ensure that you have access to the tools and equipment necessary to do your job effectively. All such assets are the property of the SunRice Group and you must ensure that you protect and care for them and only use them efficiently and for the purpose for which they are intended and authorised.

Such assets include plant and equipment, motor vehicles and inventory and all similar and related assets.

Theft, misuse or misappropriation of our assets is strictly prohibited.

In limited circumstances you may be able to use our physical assets for personal use, with the appropriate authority. You must seek permission from your immediate team leader before removing our assets from a workplace.



## SunRice Group Code of Conduct

In accordance with applicable laws, the SunRice Group may carry out surveillance of workplaces and monitor the use and operation of the our computer resources by means including software designed to filter the use of web and email content and to monitor compliance with the our policies. We may conduct forensic computer examinations randomly and/or in the event of a suspected breach of policy. Such monitoring activities may apply from the commencement of your employment or engagement and be continuous and ongoing.

You must:

- ✓ take care to prevent waste, loss, damage, misuse, theft or misappropriation of our assets and comply with, and ensure that third parties comply with, our requirements and all laws regarding the use and transfer of our assets;
- ✓ lock or appropriately secure unattended buildings, storage areas, vehicles and equipment owned, leased or occupied by us;
- ✓ report unauthorised access to our facilities to your immediate team leader;

You must not:

- ✗ allow unauthorised persons to enter any SunRice Group facilities;
- ✗ copy keys to our facilities without appropriate authorisation or give keys to unauthorised persons;
- ✗ disregard security complaints or inadequate security procedures or practices that might present safety or security threats to our people or assets;

### 6.2 COMPUTER USE AND SOCIAL MEDIA

The SunRice Group recognises that its computer, email and internet resources are critical tools of the SunRice Group's workplaces; however there are a number of serious risks or consequences that may affect the SunRice Group and you if these resources are misused.

You are entitled to access and use the SunRice Group's computer, email and internet resources for business purposes. Limited private use of the computer, email and internet resources is permitted subject to the following conditions:

- private use must be kept to a minimum;
- private use must not interfere with or delay your work obligations in any way; and
- private use must comply with all the SunRice Group's policies and directions and must not be inconsistent with your contract of employment or engagement.

While social networking can be fun and valuable, there are some risks that you need to keep in mind when using social networking tools. In the social media world, the lines are blurred between what is public or private, personal or professional. For these reasons, we have created a Social Media policy and Social Media Tip-sheet, which explains the social networking/media guidelines that apply across our organisation in order to protect you and the SunRice Group. You must acquaint yourself with and adhere to the separately published policy.



## SunRice Group Code of Conduct

You must:

- ✓ access and use the SunRice Group's computer, email and internet resources for business purposes only or for limited private purposes provided this:
  - is kept to a minimum;
  - does not interfere with or delay your work obligations in any way; and
  - complies with all SunRice Group policies and directions and is not inconsistent with your contract of employment or engagement.
- ✓ if you receive offensive or sexually explicit material, delete it immediately and report it to your team leader (particularly where the material is of a serious nature or is received on a repeated or frequent basis);
- ✓ only comment on social media as a representative of the SunRice Group if you are trained and authorised by all of your General Manager, Marketing Manager, Corporate Affairs Manager and the Company Secretary, to do so only in accordance with our *Social Media Policy* and guidelines;
- ✓ where your personal comments or profile on social media can identify you as an employee or contractor of the SunRice Group:
  - only disclose and discuss publicly available information;
  - ensure that all content published is accurate and not misleading and complies with all relevant SunRice Group policies;
  - expressly state on all postings (that identify you as our employee or contractor) the stated views are your own and are not those of the SunRice Group;
  - be polite and respectful to all people you interact with; and
  - adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.

You must not use our computer resources for:

- ✗ displaying or transmitting offensive or sexually explicit material, including from outside sources;
- ✗ unlawful activities (e.g. hacking);
- ✗ activities that create an actual or potential conflict with your obligations to the SunRice Group (e.g. sending sensitive information to a competitor);
- ✗ copying or using material in a way that infringes another party's copyright or other intellectual property rights;
- ✗ sending abusive language or graphics in either public or private messages;
- ✗ activities which could cause congestion and/or disruption of networks or systems;
- ✗ accessing, viewing, posting, downloading, storing, transmitting, sharing, printing, distributing or soliciting of any information or material that might be construed as offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringing copyright, constituting a contempt of court, breaching a court suppression order, or as otherwise unlawful; nor
- ✗ sending email messages containing material that is or could reasonably be considered offensive, defamatory, discriminatory, derogatory threatening or obscene; e.g.
  - sexual comments or images,
  - solicitation of non-business causes (e.g. to political or religious causes unless the activity is a SunRice Group sponsored or sanctioned activity);

- chain-letters; or
- gender specific comments, or any comments that might offend someone on account of his or her age, gender, sexual orientation, religious or political beliefs, national origin or disability.

### You must not knowingly:

- ✗ download, install, open or use any unauthorised software, program or file;
- ✗ connect, install or use any unauthorised hardware or other equipment;
- ✗ use software for which the SunRice Group does not have a licence or sufficient licences;
- ✗ open any files or software containing or potentially containing viruses.

When engaged on social media, you must not:

- ✗ imply that you are authorised to speak as a representative of the SunRice Group, nor give the impression that the views you express are those of the SunRice Group unless specifically authorised and trained to do so;
- ✗ use our email address or any SunRice Group logos or insignia, especially where they may give the impression of official support or endorsement of your personal comment;
- ✗ use the identity or likeness of another employee, contractor or other member of the SunRice Group; nor
- ✗ make any comment or post any material that might otherwise cause damage to our reputation or bring us into disrepute.

### 6.3 DONATIONS AND SPONSORSHIPS

Whilst personal donations are a matter for individuals, any donations to or sponsorships of any cause or charity on behalf of the SunRice Group must be approved by the General Manager, and, if appropriate, Chief Executive Officer and, in some circumstances, by the Board of Directors in accordance with the Sponsorships Policy.

As a general policy, charitable donations and sponsorships by the SunRice Group must be for approved causes to registered entities and must not create adverse reputational risks.

You must:

- ✓ seek approval from the General Manager before committing the SunRice Group to any donations to or sponsorships of any cause or charity.

### 6.4 PRIVACY AND INFORMATION SECURITY

We are committed to fulfilling our obligations under the *Privacy Act 1998* (Cth), as amended (“**Privacy Act**”) and the Australian Privacy Principles (“**APPs**”). We will take such steps as are reasonable in all the circumstances to:

- Ensure there is a clearly expressed and up-to-date Privacy Policy, explaining how personal information will be dealt with;



- Implement practices, procedures and systems relating to the SunRice Group's functions and activities to comply with the APPs;
- make sure that information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not ("**Personal Information**") we collect, use or disclose is accurate, complete and up-to-date and relevant to the purpose of use or disclosure;
- protect the Personal Information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or de-identify Personal Information if it is no longer needed by the SunRice Group, is not contained in a record owned or deemed by regulation to be owned by the Commonwealth and is not required to be retained by or under an Australian law or court/tribunal order.

Our Privacy Policy contains the standards, rights and obligations of parties in relation to the handling and maintenance of Personal Information by the SunRice Group. If you collect Personal Information on our behalf you must comply with our Privacy Policy and the requirements of the Privacy Act.

You must:

- ✓ only collect Personal Information by reasonable and fair means, without intimidation or deceptions or unreasonable intrusion;
- ✓ collect Personal Information about an individual only from the individual unless it is unreasonable or impracticable to do so;
- ✓ only collect Personal Information if the information is reasonably necessary for one or more of the functions or activities of the SunRice Group;
- ✓ comply with all legal requirements that apply to the collection, storage, use, disclosure, quality and security of Personal Information;
- ✓ use Personal Information only for the purpose for which it was collected unless otherwise authorised by the relevant individual or by law;
- ✓ utilise safeguards to help protect Personal Information against such risks as loss or destruction or unauthorised access or use, modification or disclosure;
- ✓ have a system to help ensure that Personal Information is not retained longer than legally required or necessary to meet the business reason for which the information was collected;
- ✓ maintain the accuracy of Personal Information; and
- ✓ otherwise comply with the Privacy Act, APPs and our separately published *Privacy Policy*.

You must not:

- ✗ access Personal Information unless you have appropriate authorisation and a legitimate business need for that information;
- ✗ provide Personal Information to anyone inside or outside of the SunRice Group without proper authorisation; nor
- ✗ conduct reference checks without proper authorisation or the consent of the individual.



## 7. IMPLEMENTATION

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Our Code of Conduct is supported by a range of separately published policies, which provide greater detail concerning our standards and expectations and your responsibilities.

You must adhere to the principles and requirements contained in this Code and take reasonable steps to ensure that other individuals or groups that conduct business on behalf of the SunRice Group do likewise. You must have a detailed understanding of our policies, procedures and other SunRice requirements that apply to your work.

The consequences of not adhering to our Code of Conduct and our policies and procedures may include termination of your employment or engagement.

If you become aware of a breach of our Code of Conduct, you must raise this with your immediate team leader, or if inappropriate to do so, their team leader. Failure to raise awareness of a breach is in itself a breach of our Code of Conduct.

The Code and our policies and procedures are not exhaustive and do not remove the need for you to exercise good judgement; they are intended to enable you to do so. The SunRice Group, our Board members, officers, employees and contractors all have a responsibility to work with honesty, integrity and good judgement and within the law.

If you are ever in doubt about any part of this Code or any policies and procedures, including how they affect you, or are unsure of how to apply them to a business decision or of how to respond to a given situation, you should not hesitate to request advice or help from your immediate team leader, who will either provide help directly or escalate the request to a more senior team leader for help.

This Code will be regularly reviewed to ensure that it complies with all laws and regulations applicable to our business.



## SunRice Group Code of Conduct

### DOCUMENT CONTROL

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Version	Date	Approved by	Sign-off date
July 2019	1 July 2019	Steve Tatt – Senior Business Partner – People and Culture	1 July 2019