



Our Code of Conduct

2021



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Welcome to the SunRice Group

I'd like to personally welcome you to the SunRice Group.

At the SunRice Group, we are proud of our history, our products, our brands and, most importantly, our people. Because they are the foundation of our business and are critical to our continued success. This Code of Conduct explains what we stand for and what we expect of you. Throughout our Code, we have set out simple concepts about who we are, what we do and how we do it.

Thank you for taking the time to read and understand the SunRice Group Code of Conduct. Each and every one of you plays a vital role in ensuring that we work effectively and harmoniously as one team. In doing so, you are upholding the SunRice reputation as an ethical and responsible corporate citizen.



Paul Serra
Group CEO



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Our Code of Conduct

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Our Code of Conduct (continued)

The SunRice Group Code of Conduct is a simple set of standards, values and behaviours we expect in our business. Our Code of Conduct is fundamental to the way 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 of companies including Ricegrowers Limited (SunRice), CopRice, Australian Grain Storage, Riviana, Trukai, SunFoods, SolRice, Aqaba Processing Company, Rice Research Australia, Ricegrowers Singapore, Ricegrowers Vietnam, Ricegrowers Middle East, Ricegrowers New Zealand and SunRice (Shanghai), regardless of whether you are working in Australia or overseas (referred to below as “you” or “your”).

We're all in this together.

We ask everyone to follow the Code of Conduct and help others to do the same.

So, please:

- Act in accordance with our Values
- Respect your co-workers, customers, suppliers, and other service providers
- Respect the laws regarding equal opportunity
- Take pride in what you do, performing your duties ethically and to the best of your ability, with skill, honesty, care, diligence, and integrity
- Follow the policies, standards, procedures and guidelines that relate to your employment
- Act within the laws and regulations of the countries in which you operate or are based in
- Report any breaches of this Code of Conduct to the SunRice People and Culture team or to the SunRice Legal team.



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Our Purpose

To make a difference to places and lives everywhere through nourishing and delicious products.



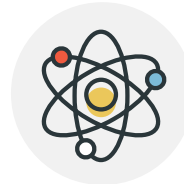
Our Values

Our five SunRice Group values form the foundation on which we build our culture. They guide our decisions and help us reach our goals.



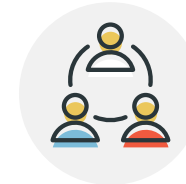
Integrity

We will always do the right thing.



Dynamic

We are fast, flexible, and energetic.



Collaborative

Everything is better when we work together.



Innovative

We constantly seek new ideas and better ways.



Community

We care deeply for the people and places that care for us.

Our Purpose, Values and Behaviours (continued)



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Our Behaviours

We will always foster a fair and ethical culture and encourage the reporting of unlawful and corrupt practices that might harm the SunRice Group and its reputation. Our four SunRice Group behaviours will help guide you in your day-to-day work, so you can make your work experience both productive and enjoyable.

Customer focussed

Without our customers, nothing matters. So, we work tirelessly to deliver the highest quality product, demonstrating and unbridled passion for customer service excellence, safety and sustainability.

Intellectually curious

We will create an environment which will keep curious minds active. We will encourage open engagement and collaboration and look at challenges as opportunities to unearth fresh, creative ideas, or new solutions.

Decisive

We do what we say and say what we do, making smart, enterprise-wide decisions, as well as taking personal accountability for results or outcomes. Being decisive also means being brave, so we're not afraid to take calculated risks to make a difference in the way we work.

Good communicators

We work hard on being respectful communicators, and pride ourselves on taking the time to listen and respond (not react). We practice coaching and the more we communicate, the deeper the understanding. That way we can best leverage everyone's capability.





Corporate Responsibility



Corporate Responsibility (continued)

We strive to ensure that all products and supplies we use are sourced in an ethical, responsible and sustainable manner. We fully support the United Nations Guiding Principles on Business and Human Rights. We expect our employees, our suppliers and their sub-tier suppliers to respect all human rights, including labour rights, throughout their business activities.

Our non-negotiable minimum standards are:

- **Child Labour:** we do not tolerate child labour and expect our business partners to adhere to ILO/UN Convention standards.
- **Bonded Labour:** we do not tolerate any form of forced labour and related practices such as the retention of identity documents from personnel. The use of corporal punishment, mental or physical coercion and verbal abuse is forbidden.
- **Serious Risk to Life and Limb:** we 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 must not be entered into with production facilities where serious risk to life and limb has been found.
- **Legal Wages:** we expect wages paid for regular working hours, overtime hours and overtime differentials to meet or exceed legal minimums or industry standards. We do not accept illegal, unauthorised, or disciplinary deductions from wages.
- **Accurate Records:** we expect 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.
- **Bribery/Threats:** we do 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 our representatives. All employees and third parties must comply with the SunRice Group Anti Bribery and Corruption Policy at all times.

- **Working Hours:** all working hours must comply with applicable local laws or industry standards, whichever affords greater protection.
- **Observed continual coercion or harassment of workers:** we will not tolerate any type of coercion, physical discipline, or harassment of workers.
- **Unauthorised Subcontracting:** we expect our orders from suppliers to be exclusively completed in the production facilities specified in production contracts. We must be immediately informed about any planned changes to designated production facilities. Unauthorised subcontracting is prohibited in all circumstances.
- **Freedom of Association:** Employees have a right to freedom of association and to bargain collectively.

We encourage you to read our Modern Slavery Statement available at <https://www.sunrice.com.au/our-modern-slavery-statement/> and our Supplier Sustainability Code available at <https://www.sunrice.com.au/suppliersustainabilitycode> for more information and guidance.



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Our Expectations of You



Our Expectations of You (continued)

Health, Safety and the Environment

We firmly believe that all accidents and workplace illnesses and injuries are preventable. That's why we're committed to work health and safety management. Our goal is to exceed our obligations under work health and safety laws wherever we operate. We require you to follow our standards, operating procedures, and be vigilant with respect to identifying hazards and reporting them to help avoid unnecessary accidents.

Please refer to the **Work Health and Safety Policy** available at <https://sunconnect.sunrice.com.au/Pages/SunPolicy-SHE.aspx> for guidance.

Alcohol and other Drugs

Without exception, SunRice workplaces must be free from use of alcohol and illegal drugs. While at work or when conducting SunRice Group business, you must not be impaired by illegal or legal drugs, including alcohol.

Our Alcohol and Other Drugs Program is available at <https://sunconnect.sunrice.com.au/pages/sunpolicy-people.aspx> and includes information on our procedures for testing for alcohol and other drugs.

Diversity, Equity and Inclusion

SunRice workplaces are built on diversity, equity and inclusion. This affords us a wide array of fresh perspectives — gender, age, ethnicity, cultural background, sexual orientation, religion, physical and mental ability, socio-economic status, thinking styles, education and experience — that promote fresh ideas, creativity and innovation, and benefit the SunRice Group's employees, shareholders, customers, suppliers and various stakeholders.

Our Diversity, Equity and Inclusion Policy can be reviewed at <https://sunconnect.sunrice.com.au/pages/sunpolicy-people.aspx>.

EEO, Non-discriminatory Practices and Respectful Workplace Behaviours

We are committed to the principle of equal employment opportunity (EEO) and to providing a productive workplace that is free from unlawful discrimination, bullying, harassment, vilification and victimisation.

Please see our Equal Employment Opportunity and Respectful Workplace Behaviours Policy available at <https://sunconnect.sunrice.com.au/pages/sunpolicy-people.aspx> for further guidance.



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Outside Directorships

For employees, the consent of the Group Chief Executive Officer is required prior to accepting or continuing an appointment as a Director or consultant to boards or government instrumentalities or engaging in activities of a similar nature in any organisation that 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. That said, you still must advise the Group Chief Executive Officer of any family company Directorships or partnerships.

For Board members, the consent of the Chairman is required prior to accepting or continuing an appointment as a Director or consultant to boards or government instrumentalities or engaging in activities of a similar nature in any organisation that is not part of the SunRice Group.

Anti-Bribery and Corruption

SunRice has a zero-tolerance approach to bribery and corruption. You must not give, offer, promise, request or authorise a bribe directly or indirectly (e.g., via a business partner). Bribes include benefits offered in the form of cash, gifts, entertainment, or other types of value.

Our Anti-Bribery and Corruption Policy specifically prohibits 'facilitation payments', even where they are legal in the country in which they are paid (unless there is a need to make a payment to avoid an imminent threat to your health or safety). All requests for facilitation payments must be reported to your team leader and to the SunRice General Counsel immediately.

Please see our Anti-Bribery and Corruption Policy at <https://www.sunrice.com.au/abc-policy> for guidance.

Conflicts of Interest

Conflicts of interest can arise when a person in a decision-making position participates in an activity or acquires another interest that could jeopardise (or be perceived as jeopardising) that person's judgment, objectivity, impartiality, or independence.

At all times you should conduct yourself conscientiously, with integrity and honesty and in the best interests of the SunRice Group. This means that your work and personal time should not in any way conflict with your responsibilities to the SunRice Group or compromise the quality of your work, or your ability to make impartial business decisions for or on behalf of the SunRice Group. You are required to disclose and deal appropriately with any conflicts that may arise between your personal interests and your duties as a director or employee or SunRice.

You must not take advantage of your position, or of the property or information of SunRice or its customers, for personal gain or to cause detriment to SunRice or its customers.

Please see our Conflict of Interest Policy at <https://investors.sunrice.com.au/investors/?page=corporate-governance> for further guidance.



Our Expectations of You (continued)

Gifts and Entertainment

Please use your best judgement when offered gifts, hospitality, or entertainment. That way, you can protect your reputation and ours against allegations of improper behaviours, as well as ensure that relevant laws are not breached. Gifts should only be accepted if they are occasional, not intended to influence decision making and are of modest value.

You must:

- Report any gift, hospitality or entertainment accepted, rejected or returned, whether directly or through an intermediary to the General Manager of your division or a member of the SunRice Legal Team
- Seek approval for any gifts, hospitality and entertainment before you give or receive them, from the General Manager of your division or the SunRice Legal Team

Please refer to our Gifts and Hospitality Policy at <https://sunconnect.sunrice.com.au/Pages/protecting-the-sunrice-anti-bribery.aspx> for further guidance.

Political Contributions and Activities

The SunRice Group does not ordinarily 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. All political contributions or activities must be conducted in accordance with the Donations, Sponsorship and Political Activities Policy.

We respect your civil rights and that you may have political interests or affiliations. Please practice your political activities or events in your own time, so they do not infringe on your obligations to the SunRice Group. It is important that you never represent your own political views or affiliations are those of, or are supported or endorsed by, the SunRice Group.

Please see the Donations, Sponsorship and Political Activities Policy at <https://sunconnect.sunrice.com.au/Pages/protecting-the-sunrice-anti-bribery.aspx> for further guidance.

Working with External Parties

Our intention is to do business with external parties who share and demonstrate our commitment to anti-bribery and corruption and the upholding of human rights. We reserve the right not to engage with parties that do not measure up to our ethical standards. When dealing with external parties engaged by SunRice, you must act fairly, honestly, and ethically.

Please see our External Parties Policy at <https://sunconnect.sunrice.com.au/Pages/protecting-the-sunrice-anti-bribery.aspx> which sets out our expectations when dealing with third parties.



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Donations and Sponsorships

We appreciate that personal donations are a matter for individuals, however any donations to or sponsorships of any cause or charity on behalf of the SunRice Group must be approved in accordance with the Donations, Sponsorship and Political Activities 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 any adverse reputational risks.

Please seek approval in accordance with the Donations, Sponsorship and Political Activities Policy before committing the SunRice Group to any donations to or sponsorships of any cause or charity.

Please see the Donations, Sponsorship and Political Activities Policy at <https://sunconnect.sunrice.com.au/Pages/protecting-the-sunrice-anti-bribery.aspx> for further guidance.

Competition and Consumer Law

Most countries where we operate have developed competition (or anti-trust) laws that are designed to prohibit a range of practices that restrict trade or free and fair competition. This includes price fixing, market sharing, bid rigging or abuses of a dominant position. We 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 the SunRice Group Competition and Consumer Law Policy at <https://sunconnect.sunrice.com.au/pages/consumer-law.aspx> and participate in relevant training initiatives provided by the SunRice Group. You must conduct yourself in a manner that does not breach competition laws and act fairly when dealing with our competitors, customers, suppliers, business partners and other third parties.

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.

Insider Trading

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 to invest or not 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 entry into 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 (family member, friend or family company or trust) to undertake insider trading or pass on the information to those who may use it to deal in securities.

Please see our Share Trading Policy available at <https://sunconnect.sunrice.com.au/pages/sunpolicy-corporate.aspx> for further guidance or alternatively seek guidance from the SunRice Group's General Counsel.

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Privacy and Information Security

Personal Information (PI) is information about a person whose identity is apparent or can be reasonably ascertained. Privacy laws dictate strict rules around how we can collect, use, and share that PI and how to handle and protect that information. You must comply with these laws and take steps to keep all PI you handle secure.

You must comply with our Privacy Policy available at <https://www.sunrice.com.au/privacy-policy/>. If you become aware of a privacy breach within the SunRice Group (or by one of our suppliers), you should contact the SunRice Group General Counsel and follow our data breach guideline available at <https://sunconnect.sunrice.com.au/pages/sunpolicy-information-systems.aspx>.

Computer Use and Social Media

Computer, email, and internet resources are critical tools of our workplaces. However, there are several serious risks or consequences that may affect SunRice if these 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 provided that:

- It will not interfere with or delay your work obligations in any way
- Use complies with all relevant SunRice policies and directions and is 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. Unfortunately, in the social media world the lines can be blurred between what is public or private, personal or professional.

Please familiarise yourself with our Social Media Policy and Social Media Tip-sheet, both available at <https://sunconnect.sunrice.com.au/pages/sunpolicy-corporate-affairs.aspx>. These explain social networking and media guidelines that apply across our organisation to protect you and the SunRice Group.

Speak Up!



**Encounter any of the above?
If so, speak up.**

Your voice matters. If you see something that is inconsistent with this Code of Conduct, or witness fraudulent, illegal, or corrupt behaviour, please speak up. We value your help in avoiding and uncovering potential misconduct and preventing future problems. Your voice helps us to maintain our core value of integrity and helps foster the trust and respect in our relationships.

It's important to note that there are both internal and independent avenues for you to report a concern. In the first instance, you can contact your team leader, or the SunRice Integrity Officer regarding your concern. If for any reason you feel uncomfortable doing so, please contact the SunRice Speak Up hotline (hosted by an independent external company) to make a report. This hotline is available 24-hours, 7 days-a-week.

When making your report, you can choose to remain anonymous, however this does make reports harder to investigate. All reports are dealt with sensitively and are only shared with those who need to know, so we can properly investigate them. Your confidentiality is important to us and you will not be disadvantaged or compromised in any way for making a report.

Our Speak Up Policy is available at <https://investors.sunrice.com.au/investors/?page=corporate-governance>

Contact us

The Board of Directors of SunRice will review this Code of Conduct from time to time to ensure that it is operating effectively and whether any changes to it are required.

Report to the Integrity Officer

Telephone: +61 2 9268 2074

Email: ABCreporting@sunrice.com.au

Post: PO Box Q166 QVB, Post Shop, NSW 1230, Australia

Report to the SunRice Speak Up

Telephone:

Australia – 1800 953 947

Papua New Guinea – 000 861 271

Singapore – 800 852 3976

USA – 833 581 0346

Vietnam – Dial the direct access number for your location: 1 201 0288 or 1 228 0288.

At the English prompt dial 833-581-0346.

Other countries – please report online at <https://sunrice.ethicspoint.com> (online reporting is available for all countries).

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We take this Code of Conduct seriously.
If you have any questions about the Code,
please contact your people leader or the
People & Culture team.

