

GWF CODE OF CONDUCT

Policy Applies To	All George Weston Foods (GWF) employees in Australia and New Zealand		
Policy Owner / Function	GWF Group P&P Director People and Performance	Policy Approver	GWF, Chief Executive Officer
Policy Review Date	November 2024	Next Review Date	November 2026

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1. DEFINITIONS

For the purposes of this policy and under the *Fair Work Act 2009* (FWA).

- **George Weston Foods:** (GWF, we, us, our) George Weston Foods Limited, George Weston Foods (NZ) Limited and their related companies.
- **Employee:** Individuals who are directly engaged by GWF as employees on a permanent or fixed term / maximum term engagement, full-time or part-time, and casual employees.
- **People Leaders:** (Leader, Manager): Employees who have direct line management accountability.
- **National Employment Standards (NES):** the minimum employment entitlements that have to be provided to all employees in Australia.

2. PURPOSE

George Weston Foods Limited, George Weston Foods (NZ) Limited and their related companies (**GWF, we, our, us**) are committed to achieving the highest standards of ethical conduct in all aspects of our business.

All GWF employees, officers and directors must display exemplary standards in relation to professional business conduct as well as complying with the law. High standards of conduct will serve to enhance our reputation for fair and responsible trading, as a good employer, and encourage appropriate behaviour across the business. We believe that these behaviours build trust between our people and our customers and service providers, enhance our reputation and ensure our continued prosperity.

The purpose of the Code of Conduct (**Code**) is to articulate the principles which guide the conduct of the GWF business and reflect our commitment to integrity and honesty, legal compliance, the community and environment, fair dealing, accountability, open communication and diversity in our workplaces.

If you work at GWF in any capacity, including GWF Employees, potential employees and contractors, whether on a full-time, part-time or casual basis, on or off-site, or if you are a customer or visitor attending our workplace or an event we have organised (**you, person, people**), then this Code applies to you and you must familiarise yourself with, and comply with, this Code and any variations to this Code.

3. CODE OF CONDUCT

A. BE ETHICAL AND HONEST

All our affairs must be conducted and be seen to be conducted in an ethical and honest manner. This means that our people are expected to act with honesty and integrity in all GWF business dealings. Lack of integrity and honesty impacts morale of our people, damages our reputation and may constitute a criminal offence.

Our people are expected to take reasonable care to meet business commitments which are made, to follow standard business practices, to respect others, to adhere fully to their own values and

GWF values in the performance of work and to be accurate and truthful in dealings with third parties. Unethical and dishonest behaviour may be regarded as serious misconduct and may result in dismissal.

B. COMPLY WITH ALL LAWS AND GWF POLICIES

Our people must comply strictly with:

- All laws, licences, rules and regulations which apply to the conduct of our business across all jurisdictions, including competition laws;
- All GWF policies, including this Code, the **Workplace Behaviour Policy, Health, Safety and Wellbeing Policy**, People & Performance, Group, Finance and Management policies; and
- All relevant policies of our parent company, Associated British Foods (**ABF**), including the **Red Book** and **ABF Anti-Bribery Policy**.

It is the responsibility of all our people to ensure to that they have sufficient knowledge about the laws, licences, rules and regulations which affect the performance of their duties for and operation of the business at GWF and that they are familiar with and comply with all GWF policies as well as relevant policies of ABF. Advice may be sought from managers, People & Performance specialists, GWF Legal or other appropriate personnel as required, and copies of all policies which apply to our people are available on the GWF Intranet or with the site People & Performance Manager. Failure to comply with laws and/or policies may result in disciplinary action.

Please refer to the GWF Intranet or your People & Performance Partner for a listing of GWF policies and ABF policies which our people and contractors are required to be familiar with and comply with when working for us.

C. HUMAN RIGHTS AND MODERN SLAVERY

GWF respects all human rights, for all people, and recognises the importance of the UN Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development's Due Diligence Guidelines on Responsible Business Conduct, which require businesses to have a rigorous approach to due diligence.

GWF conducts its business in accordance with these requirements and applicable laws and standards. It is committed to ensuring no modern slavery happens within its operations or supply chains, including no human trafficking, forced, bonded or involuntary labour, and no child labour.

GWF has zero tolerance of forced or bonded labour and our Employees are expected to take reasonable care to ensure that our people, customers and service providers adhere to this, at all times.

D. BE A GOOD CORPORATE CITIZEN

GWF is committed to being a good corporate citizen. We strive to achieve the high standards expected of companies in the countries in which we operate. Every person is encouraged to become involved in GWF charity work and to be involved in the community. GWF has a

commitment to the protection of the environment and our people are called to challenge practices that they believe may be environmentally irresponsible.

E. AVOID CONFLICTS OF INTEREST

Our people must not place themselves in a position which may lead to a conflict, or perceived conflict of interest, between their personal interests and those of our business. A conflict of interest exists if a person is involved in other employment, businesses or external activities that interfere with, or impact on, their ability to satisfactorily perform their duties for GWF. All of our people should ensure that their activities do not conflict with or reflect adversely on our interests, deprive us of legitimate work time, or compete with our businesses.

All persons must notify GWF of any commitment to another employer, business or external activity which may lead to a conflict, or results in a conflict. A serious conflict of interest, or a failure to disclose as soon as possible any conflict, or perceived conflict, of interest, which cannot be satisfactorily managed or resolved, may result in disciplinary action up to and including termination of employment.

F. REFUSE IMPROPER GIFTS AND HOSPITALITY

GWF recognises that there may be situations in which it may be appropriate to accept modest gifts or business hospitality out of courtesy, and to build relationships with our customers and business associates, i.e. that would be acceptable in the normal course of business. However, GWF is committed to the fair and honest conduct of business and our people must refuse to accept, and must not provide to any other party, any gifts or hospitality:

- over and above that required for, or appropriate to, the normal conduct of business; or
- which may compromise a person's impartiality; or
- which would otherwise be inconsistent with standard business practices; or
- be construed as improper or corrupt, or violate any law, regulation, rule, GWF or ABF policy.

Our people should refer to, familiarise themselves with, and comply with the **ABF Anti-Bribery & Corruption Policy**, which provides further detail on this issue.

G. USE GWF RESOURCES AND PROPERTY RESPONSIBLY

Our people are to use and operate GWF resources and property in a proper and efficient manner and are to protect GWF resources and property from loss, damage, misuse, theft, embezzlement and inappropriate destruction at all times.

Our people must not use GWF resources, property (including intellectual property), information, their position (**GWF resources**), or opportunities which arise from GWF resources to improperly gain benefit for themselves or for another party.

Our people have an obligation to avoid all financial, business and other arrangements which may be opposed to the interests of GWF, or which may place them you in a competitive position with GWF.

The product of any work performed by our people while employed, engaged or otherwise appointed by GWF, or on behalf of GWF, or using GWF resources, belongs to GWF.

Our people are not permitted to use any GWF resources or property, including computer equipment, telephones, facsimiles and the email system for any non-GWF activity (other than an incidental and minor personal purpose) whether in or outside of work time, unless prior approval for the use of that resource or property has been given by that person's line manager.

An incidental and minor personal purpose is a purpose which does not:

- Substantially impact on the person's performance of their duties to GWF;
- Give rise to personal gain to the person; or
- Constitute a use that would otherwise violate other GWF policies, including those in respect of employee time, commitments to work and use of equipment.

H. KEEP GWF'S INFORMATION CONFIDENTIAL

All information pertaining to GWF may only be used in the performance of duties or services to GWF and it is prudent to assume that all such information is confidential (including information about GWF's business and financial affairs, employees, intellectual property, its competitors, customers, employees, products and services). The improper handling of confidential information may constitute a breach of law or a GWF policy.

Every person must keep confidential information acquired while they are with GWF, or acting on behalf of GWF, confidential, even after they leave or cease their employment, engagement or appointment with GWF.

Every person using personal communication or entertainment devices for work related activities must take extra care to safeguard the confidentiality of the information contained on, or transmitted through the device.

I. RESPECT THE PRIVACY OF INDIVIDUALS

GWF respects the privacy of individuals whose personal information it holds and complies with the National Privacy Principles. It is essential that all persons who handle personal information are familiar with and comply with the **General Privacy Policy** and **Employee Privacy Policy**, any other GWF privacy procedures and any other privacy and data protection laws that may apply (such as the *Privacy Act 1998* (Cth)).

J. CULTIVATE SAFE, HEALTHY AND DIVERSE WORKPLACES

GWF is committed to providing our people with equal access to opportunities and, as far as reasonably practicable, healthy and safe workplaces.

Our people should be familiar with and comply with GWF's policies, including the

- **GWF Workplace Behaviour Policy;**
- **GWF Health, Safety and Wellbeing Policy;** and

- **GWF's Workplace Behaviour Policy;**

Our people are required to behave in a way that ensures their own safety and the safety of others, at all times.

GWF will not accept behaviour that puts at risk the safety of others in the workplace, or anyone our people interact with. This includes physical and psychological violence or harm, or threats of violence or harm.

A measure of our success in this area is that GWF businesses look to be as diverse and representative of the communities in which they operate. We are committed to inclusion and equity in our workplaces and in all our dealings.

We treat people with respect and do not tolerate any form of bullying, harassment, discrimination, victimisation, vilification or intimidation. Any such conduct will be dealt with in accordance with GWF's Workplace Behaviour Policy.

K. YOUR RESPONSIBILITIES

If any person believes there is an actual, or suspected, breach of this Code occurring, it is that person's obligation to bring it to the attention of one of our Leaders, or via the means of communication, set out in Section 4 below. All reports will be treated seriously by GWF and held confidentially within the Group, except to the extent GWF may have to disclose information to a regulatory body, as required by law or to allow for a proper investigation or disciplinary process to be conducted.

No person, acting in good faith, will be victimised or treated unfairly for making a complaint. Complaints that are vexatious or malicious may result in disciplinary action against the complainant.

What are the responsibilities of Employees?

- Learn about, and work in accordance with this and other GWF policies and procedures at all times.
- Work effectively and efficiently, perform duties impartially, with professionalism, objectivity and integrity, and otherwise fulfill the obligations associated with any contract of employment or services.
- Report any situation that could be considered a breach of this Code of Conduct and, where appropriate, encourage other persons to raise concerns too.
- Role model and share knowledge about this Code of Conduct with other colleagues and our people.
- Keep the Code of Conduct accessible for ongoing reference.
- Communicate directly and honestly and comply with lawful and reasonable instructions issued by their line manager in all aspects relating to this Code of Conduct.

What are the additional responsibilities of People Leaders?

- Lead by example and comply with this Code of Conduct, and other applicable policies and procedures.
- Build knowledge of and compliance with this Code of Conduct, and other applicable policies and procedures.

- Lead and manage team members in accordance with this Code of Conduct and GWF’s values.
- Provide Employees with the support needed to be successful in their role.
- Provide an environment where Employees feel they can raise and discuss their concerns.
- Ensure that the confidentiality and privacy of reports made under this Code of Conduct is upheld at all times.
- Respond to any questions received about GWF’s expectations in accordance with this Code of Conduct.
- Ensure that any unsafe situations or conditions, or other actual or potential breaches of this Code of Conduct or other laws, policies or procedures are reported as soon as possible through the appropriate channels, in accordance with GWF’s relevant policies and procedures.

4. WAYS TO RAISE A CONCERN

Contact your Line Manager/ Head of Department / People & Performance Partner	There is no special procedure for doing this. You can speak with them about the problem, issue or concern, or put it in writing if you prefer.
Contact the GWF Group People and Performance Director	Email or call Michelle Pombart, Group People & Performance Director on +61 414 210 019 or michelle.pombart@gwf.com.au
Contact the GWF Group General Counsel Asia Pacific	Email or call Andrew Cullen, Group General Counsel on +61 414 862 845 or Andrew.Cullen@gwf.com.au
Raise it via ‘Speak Up’ The ABF / GWF independent Ethics Hotline	GWF has an arrangement with an independent external party Speak Up where you can express your concerns anonymously. If you feel you are unable to raise the matter internally, for whatever reason, you should use this service. Your details will only be provided to GWF if you agree. You can either: <ul style="list-style-type: none"> ○ Call Speak Up on +61 2 8284 6262 (Australia) or +64 9 913 5892 (New Zealand), or ○ Use the online webservice: https://abf.speakup.report/gwf ○ GWF’s online access code for both Australia and New Zealand is 123826 All matters, including those raised anonymously, will be reported to GWF’s Ethics Committee to consider and, where appropriate, investigate.
Notify the Company Secretary of our Parent Company, Associated British Foods plc (ABF)	If you have reasonable grounds for believing that the CEO or Directors of GWF may be involved in or condoning behaviour in breach of this Policy, you should report it to: The Company Secretary of ABF - contact Ray Cahill on +44 (0)7547 801 310 or ray.cahill@abfoods.com .

5. CONSEQUENCES OF BREACHING THIS CODE OF CONDUCT

GWF retains its right, in its discretion, to commence disciplinary action for any breaches of this Code of Conduct. Disciplinary action may include a written warning, counselling, suspension or the termination of a person's employment, appointment or engagement.

GWF may also refer a breach of this Code of Conduct to law enforcement or other authorities where necessary.

6. GWF POLICY STATEMENT

This Code of Conduct is a GWF Policy.

As a GWF employee this policy applies to you, and it is your responsibility to familiarise yourself with and comply with this policy and any variations to it.

GWF Policies provide employees with information about their rights and responsibilities, terms and conditions and the standards and expectations required of all employees to ensure that our organisation is safe, secure and that working at GWF is engaging, productive and supportive.

GWF Policies are accessible to all employees via the GWF SharePoint / Intranet site under the Policies and Procedures section. Policies will be made available on sites and specified locations as required under applicable industrial agreements and WHS legislation, and as necessary to ensure all employees are able to access company policies.

GWF Policy may be reviewed, varied, added to or withdrawn by GWF at any time, at its absolute discretion. This policy, and any amendments to it, do not form part of an employee's employment contract or agreement or any independent contractor agreement (as may be the case).

GWF Policy is subject to the provisions of any legislation, contract, or industrial instrument, such as an enterprise agreement or award, which apply to an individual's employment with GWF.

7. RELATED POLICIES AND DOCUMENTS

- ABF Red Book
- ABF Speak Up Policy and Australian Addendum
- General Privacy Policy
- Health, Safety and Wellbeing Policy
- Workplace Behaviour Policy
- Anti-Bribery & Corruption Policy
- Responsible Sourcing Code of Conduct

Statement from Chief Executive

I am fully committed to the purpose of this policy and its (effective operation) implementation and approve this GWF Policy. The welfare, wellbeing, and safety of all our employees is our priority. This policy supports the delivery of high performance and ways of working that reflect our values and strategies.

Paul Foster

Chief Executive Officer, George Weston Foods

Date Policy Approved

Submitted for final approval by:

Michelle Pombart
GWF Group P&P Director
Policy Owner

Date