



Code of Conduct

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AACo Code of Conduct

1 Introduction

Since 1824, the Australian Agricultural Company (AACo) has been dedicated to producing high-quality beef and agricultural products while responsibly managing the land on which we operate. We are proud of our heritage and committed to conducting our business with integrity, responsibility, and respect.

This Code of Conduct (Code) sets out the standards of behaviour and ethical principles that are expected of all AACo Workers and Contractors. It reflects our core values and guides how we work together, interact with stakeholders, and represent AACo across all locations where we operate.

This Code is not incorporated into any employment agreement or contract for service, and may be amended by AACo at any time at its absolute discretion.

Our Purpose is *reimagining Australian agriculture to share with the world*.

Our Vision is *to be the leading food and agricultural company delivering nature-led solutions at scale*.

Our Values are:

Be Curious

Look beyond the expected and always seek out opportunities to grow.

Be Generous

Reach beyond your patch and contribute to the bigger picture.

Own Your Impact

Take accountability for what you do and set your bar high.

2 Definitions

AACo Group means Australian Agricultural Company Limited and its subsidiaries and associated entities worldwide.

Contractors means independent contractors engaged by the AACo Group to provide services and includes the Contractors' employees and sub-contractors. Nothing in this Code is intended to change the nature of the principal-contractor relationship between AACo and its Contractors.

Directors includes all members of the Boards of AACo Group entities.

Employee means individuals employed by the AACo Group on a full-time, part-time, casual, or fixed-term basis, wherever they are employed across the world.

Workers means Employees and Directors.

Workplace includes all places where work may be performed.

Work-related activities include any tasks, events, or conduct connected to a Workers employment. This covers formal work duties, employer-organised events (such as meetings, training or social functions), and behaviour in remote or employer-provided accommodation where Workers are required to live. It also includes conduct outside normal work hours if it may reasonably affect the workplace, colleagues, or the employer's reputation or responsibilities.

3 Scope

This Code applies to all Workers and Contractors of the AACo Group, regardless of their location. Compliance with this Code is a condition of employment or engagement at AACo. The obligations under this Code extend to:

- All AACo workplaces and worksites;
- While working remotely or travelling for work;
- At work-related events, including social functions;
- Interactions outside of work or the workplace where conduct could impact AACo's reputation, Workers or Contractors or workplace culture. For those living on station or other AACo-provided property, this would include interactions anywhere on the station or property;
- While using AACo's digital platforms or IT systems; and
- When posting any content related in any way to AACo on external digital platforms.

You must comply with the higher of the standards required under the law of the country in which you work and the standards within this Code.

4 Our Responsibilities

All Workers and Contractors must:

- act with integrity;
- in the case of Employees and Directors, act in AACo's best interests;
- in the case of Contractors, not act against AACo's interests during their engagement;
- treat each other with respect and professionalism;
- follow all applicable laws, regulations, and AACo policies;
- speak up and report misconduct or concerns; and
- act in a responsible way to not just protect AACo but grow its reputation in the eyes of our many stakeholders.

Managers at AACo have an additional responsibility to model appropriate behaviour, support Workers and Contractors in understanding their obligations, and act if an issue arises.

5 Our Commitments and Expectations

5.1 Respecting Each Other

AACo is dedicated to providing workplaces that are inclusive, safe, and respectful. All Workers and Contractors are expected to treat each other with respect, professionalism and dignity, ensuring a work environment (which includes for those living on station, all areas of the property) free from bullying, harassment, sexual harassment, discrimination, racism and violence, in accordance with AACo's [Respecting Each Other at AACo Workplace Behaviour Policy](#).

This Policy outlines the many forms that inappropriate conduct can take including:

- Workplace bullying: is repeated, unreasonable behaviour directed towards a Worker or Contractor or a group of Workers or Contractors, while at work, that creates a risk to health and safety. Risk to health and safety includes risk to the psychological, emotional or physical health of the Worker or Contractor or group of Workers or Contractors.
- Harassment: is any unwelcome and uninvited behaviour (verbal, non-verbal, physical, written or visual) which intimidates, humiliates or offends another person or persons on the basis of one or more protected attributes possessed by a person including, but not limited to, their race, colour, sex, sexual orientation, transgender status, age, physical or mental disability, marital

status, family or carer responsibilities, pregnancy, breastfeeding status, religion or political opinions.. One-off incidents can constitute harassment.

- Sexual harassment: is any unwelcome sexual advance, request for sexual favours, or other unwelcome conduct of a sexual nature which has the possibility of intimidating, humiliating or offending the person whom the conduct is directed at, or another person or persons. Sexual harassment can be a one-off incident.
- Discrimination: direct discrimination is when a person or group of people are treated less favourably than another person in the same or similar circumstances due to a protected characteristic, including but not limited to, sex, intersex status, marital or relationship status, pregnancy, breastfeeding, parental status or carers' or family responsibilities, sexual preference, sexual orientation, gender identity, race, colour, descent, nationality, national origin, ethnicity, religion, disability or impairment and age. Indirect discrimination involves a condition, requirement or practice being imposed more widely which has, or is likely to have, the effect of disadvantaging persons with a protected characteristic and the condition, requirement or practice is not reasonable in the circumstances.
- Victimisation: where a person causes detriment to another person, or threatens to do so, because the other person has or could make a complaint, including in relation to discrimination, harassment or bullying. Victimisation can include threats, "pay-backs", retribution or acts of intimidation. Victimisation refers not only to acts against the person making a complaint, but also acts towards others involved in any investigation including the alleged respondent, witnesses, supporters and those resolving or investigating any complaints.
- Vilification: is a public act which incites, encourages, or urges others to hate, have serious contempt for, or severely ridicule, a person, or group of people because they have (or are thought to have) certain protected characteristics.

The above conduct will not be tolerated by AACo and may result in disciplinary action being taken against those who engage in such behaviour, up to and including the termination of their employment or engagement with AACo. In certain circumstances, this conduct may also constitute unlawful behaviour and Workers and Contractors may face legal consequences in addition to any disciplinary actions taken by AACo.

There are many other forms of unacceptable or inappropriate behaviour and sometimes it can be hard to define and does not necessarily have a "label". This can include the use of foul, abusive, or offensive language, whether verbal, written, or digital. The use of excessive swearing, slurs, or any language that intimidates, harasses, or degrades others is not acceptable. All interactions must be conducted with professionalism and respect for those around us. If a Worker or Contractor witnesses inappropriate behaviour or becomes aware of behaviour which is inappropriate including bullying, harassment, sexual harassment, racism, discrimination, victimisation or vilification, they are expected to raise it immediately with their manager.

All Workers and Contractors are expected to be responsible for their conduct and behaviour. AACo does not tolerate inappropriate conduct or behaviour directed towards our Workers, Contractors, or anyone that interacts with our workplaces, whether it be in the workplace (including extended workplace areas on our properties and AACo accommodation), at AACo functions or events involving other team members (in or outside working hours) or in other settings involving interactions with our colleagues, customers, Contractors or suppliers, including but not limited to industry and community events in regions in which we operate.

We recognise that, at times, interpersonal differences may arise within our working environment. It is important to understand that such situations do not necessarily constitute misconduct or inappropriate

behaviour. We encourage you to address these matters through the processes outlined in [AACo's Grievance Policy](#).

5.2 Diversity, Equity and Inclusion

AACo values the diverse backgrounds, cultures, and experiences of our Workers and Contractors and is committed to fostering an equitable and inclusive workplace.

We are an equal opportunity employer and base decisions regarding recruitment, promotion, transfers, and development on merit, ensuring that all Workers are treated fairly and consistently. Our employment practices are governed by the [Recruitment Policy and Procedure](#) and other applicable policies.

All Workers and Contractors must contribute to an inclusive workplace by respecting individual differences and upholding our commitment to a discrimination-free environment. Further information can be found in AACo's [Diversity Policy](#).

5.3 Respecting Cultural Heritage

AACo acknowledges and respects the cultural heritage of our people and the communities in which we operate. We are committed to meaningful engagement and recognise that strong partnerships contribute to our long-term success and the sustainability of the regions where we operate.

All Workers and Contractors must:

- Act with cultural awareness and sensitivity in their work;
- Respect sacred sites, traditions, and cultural heritage protections relevant to AACo's operations; and
- Consult with the Head of External Affairs for any questions or guidance on current or future First Nations engagement commitments.

5.4 Health & Safety

At AACo, we prioritise the wellbeing, health and safety of our people and preventing injuries in the workplace. Safety is a shared responsibility, and every Worker and Contractor has a duty to protect their own health and safety and that of others. Nothing is as important as our people. If you see something unsafe, observe any unsafe practices, or injure yourself at work, you are required to take appropriate action and report it immediately. All Workers and Contractors must comply with AACo's health and safety policies and procedures at all times.

All Workers and Contractors must:

- Immediately stop any job or task that is unsafe and consult with others to prioritise safe solutions before the task can continue;
- Always address hazards as you become aware of them, and take immediate action to manage the hazard, or report if further action is required;
- Only use equipment that you are trained and authorised to use;
- Follow all AACo policies and processes at the workplace, including verbal and written instructions, rules, policies or procedures;
- Always take care of your own health and wellbeing and not undertake duties at the workplace that may impact the health and safety of you or others at the workplace; and
- Immediately communicate any health and safety incidents at the workplace to your manager, another leader or via AACo's safety reporting platform, MyOSH.

5.5 Drugs, Alcohol, and Fitness for Work

AACo is committed to providing a safe and healthy workplace. Workers and Contractors share a personal responsibility to ensure they are physically and mentally fit to perform their duties safely and

effectively. This includes arriving at work well-rested, unimpaired, and in a condition that does not pose a risk to themselves or others. Workers and Contractors must not engage in work if their fitness, whether due to fatigue, illness, stress, substance use, or any other factor, may compromise safety, performance, or judgement. If you are unfit or unsure about your fitness for work, you are expected to notify your manager promptly and seek appropriate support.

Workers and Contractors must not be under the influence of drugs or alcohol while performing their work.

AACo has a zero-tolerance policy regarding the possession, use, sale, or distribution of illegal drugs in the workplace or at work-related activities, including in accommodation provided by the company, as well as the improper use of legal or prescribed drugs, during work, work-related events or in the workplace. Our zero-tolerance policy extends to conduct in accommodation provided by the company and during leisure time for station-based Workers and Contractors.

Alcohol consumption at the workplace and work-related functions must be responsible. Workers and Contractors must not:

- Consume alcohol to excess or behave inappropriately;
- Pressure others to drink alcohol or create an uncomfortable environment for those who choose not to drink;
- Provide alcohol to individuals under 18 years of age, or the minimum lawful drinking age in the applicable jurisdiction; and
- Otherwise act in a manner inconsistent with the standards set out in this Code.

Random drug and alcohol testing may be conducted at AACo worksites to ensure compliance with AACo's policies.

Further details are provided in the [Drugs, Alcohol and Fitness for Work Policy](#) and the [Smoking Policy](#).

5.6 Wellbeing, Support and Family

We are committed to fostering a supportive and inclusive workplace that prioritises the wellbeing of our Workers, Contractors and their families. AACo recognises that it can be isolating for our Employees who work in remote locations, or travel frequently, and may be away from family and friends for extended periods.

We encourage all Workers and Contractors to check in with each other and offer support. If you need assistance or recognise that a teammate might need assistance for any matter, at any time, we encourage you to raise these concerns with your manager. AACo also provides access to confidential and independent support through our Employee Assistance Program (EAP). Details on how to access this service are provided in section 8.3 below.

6 Playing Our Part at AACo

6.1 Social Media & External Communications

AACo recognises that social media can be a common part of everyday life. However, Workers and Contractors must use it responsibly and in a way that does not harm AACo's reputation or breach company policies. All Workers and Contractors have a responsibility to protect the company's reputation and brand.

Workers and Contractors are expected to use discretion and good judgment when posting photos or content related to workplace activities on social media. Images that may seem harmless, humorous, or routine in an operations or commercial context can be misinterpreted by others who do not have the full picture, particularly in operational settings where safety and animal welfare is a top priority. Workers and Contractors should avoid sharing content that could raise unnecessary concern about safety

practices or give a misleading impression of how work is conducted. When in doubt, consult your manager or the internal communications team before posting.

When using social media or any online media forums, Workers and Contractors must not:

- Post material that is threatening, offensive, racist, or discriminatory or which would create concerns regarding animal welfare;
- Engage in harassment, sexual harassment or bullying;
- Share confidential or commercially sensitive AACo information; and
- Make false, misleading, or disparaging comments about AACo, Workers, Contractors, customers, or suppliers, or communicate anything that would undermine the confidence or support of our customers, suppliers, stakeholders or the public's trust and confidence in AACo, or that damages AACo's reputation. Only authorised representatives may speak on behalf of AACo. Workers and Contractors must not:
 - Represent AACo in any external forum (including the media or government) unless authorised;
 - Use AACo branding or logos without approval;
 - Disclose confidential or sensitive information; and
 - Make political statements, express views or advocate on behalf of AACo.

If you are unsure if something complies with AACo's policies in relation to social media and external communications, please contact AACo's Head of External Affairs.

6.2 Responsible Use of AACo Property

AACo provides Workers and Contractors with the resources necessary to perform their roles effectively. These may include AACo property, such as vehicles, machinery, laptops, mobile devices, tools as well as facilities and accommodation. This property must be used responsibly and in AACo's best interests at all times.

All Workers and Contractors must:

- Use AACo property and other resources solely for work-related purposes, unless otherwise approved.
- Operate vehicles in accordance with the [Motor Vehicle Policy](#).
- Take reasonable care of AACo property and report any damage, loss, or misuse immediately.
- Follow relevant policies regarding the appropriate use and maintenance of company property.

6.3 Responsible Use of AACo IT Systems and Equipment

AACo's IT platforms, systems and equipment, including computers, email, internet, communication devices, and other digital tools, must be used in accordance with company policies.

When using AACo IT platforms, systems and equipment, Workers and Contractors must not:

- Use AACo's IT platforms, systems and equipment for personal gain or unlawful activity;
- Access, share, download or circulate illegal, inappropriate or offensive content;
- Send email messages or other online communications that are bullying, harassing, defamatory, threatening, abusive or obscene;
- Share confidential company information without authorisation, including to a personal email address or other personal online system; and
- Introduce unauthorised software or cyber security threats to AACo systems.

When using AACo IT platforms, systems and equipment, Workers and Contractors must:

- Exercise good judgement and use respectful and appropriate language;

- Comply with AACo's cyber security processes;
- Familiarise themselves, and ensure that they comply, with AACo's [Information Security and Access Policy](#).

AACo monitors the use of its IT systems and devices, including network access, web browsing, and electronic communications, on a continuous basis. Monitoring occurs regardless of location or device used, and includes logging and recording user activity which may be reviewed when required. Users should exercise discretion when storing or transmitting sensitive personal or confidential information. AACo may access and report on electronic records where there is a business or legal need. AACo may also carry out continuous, ongoing camera surveillance on and around its premises and in any other place that Workers and Contractors may work.

6.4 Confidentiality & Protecting Information

All Workers and Contractors have a duty to protect AACo's confidential information. This obligation is a fundamental term of employment or engagement and is further detailed in the [Information Security and Access Policy](#).

During their employment or engagement, Workers and Contractors may have access to confidential information about AACo, its customers, suppliers, and other Workers and Contractors. Workers and Contractors must not disclose or improperly use this information, either during or after their employment or engagement, with any third-party including shareholders, analysts, or journalists.

AACo's confidential information must never be used by Workers and Contractors for personal gain or to AACo's detriment. Under the *Corporations Act 2001* (Cth), it is unlawful to improperly use your position or any information obtained through your position to improperly gain an advantage for yourself or another person, or to cause detriment to AACo.

Accurate record-keeping is fundamental to ethical business conduct. Workers and Contractors must ensure that all records and documents are complete, truthful, and maintained in accordance with applicable requirements. Records must not be falsified, altered, or misrepresented in any way.

AACo requires that Workers and Contractors to act lawfully, ethically, and with integrity in all their interactions and in financial transactions. AACo requires its Workers and expects its Contractors to:

- Record all financial transactions clearly, fully, accurately, in a timely way, and in compliance with applicable law, accounting standards, and AACo procedures;
- Maintain complete, accurate and transparent books and records, including all documents (such as tax invoices, purchase orders and receipts) in respect of all transactions;
- Store all relevant documentation appropriately, in compliance with the [Information Retention Policy](#) and any relevant legislation.
- Be cautious on social media. Even seemingly innocent posts, photos, or comments (e.g., about work activity, unusual business travel, or major project milestones) can unintentionally reveal confidential, commercially sensitive or insider information.
- In very limited circumstances, AACo may consent to the disclosure of confidential information. Such disclosure requires prior written approval from a member of AACo's Executive Leadership Team/CEO].

Additionally, under Australian and international privacy laws, AACo is obligated to protect the personal information of customers, suppliers and Workers. Workers and Contractors must comply with the [Privacy Policy](#) and must not disclose personal information unless required to do so by a court order.

6.5 Conflicts of Interest

Workers and Contractors must act in AACo's best interests and avoid situations where personal interests could conflict with their professional responsibilities.

A conflict of interest arises when personal relationships, financial interests, or external activities interfere with a Worker or Contractor's ability to make impartial decisions for AACo. Refer to the [Personal Relationships in the Workplace Policy](#) and [Conflicts of Interest Policy](#) for further information.

All Workers and Contractors must:

- Disclose actual, potential, or perceived conflicts of interest as soon as they arise;
- Remove or recuse themselves from any situation where their objectivity could be compromised;
- Not use their role at AACo for personal gain or to benefit family, friends, or associates;
- Seek approval before engaging in secondary employment or business activities; and
- Comply with any reasonable direction from AACo regarding conflict management.

6.6 Attendance & Professional Conduct

Workers are required to report to work as scheduled and on time. Unplanned absences must be communicated to your manager as soon as practicable. Contractors are required to communicate to AACo/AACo's nominated contact person if they (or their nominated personnel) are unable to deliver their services as scheduled or if delivery of their services will be delayed for any reason.

While at work on an AACo property, or when representing the company, Workers are required to maintain an appearance that aligns with role-specific requirements. This includes:

- Wearing clothing that is safe in the relevant environment, including appropriate protective or safety clothing when required;
- Wearing clothing in line with applicable guidelines for your role and brand standards or professional business attire at other times. Cultural and religious garments may be worn when they are safe and appropriate to the relevant environment;
- Being clean, tidy and maintaining personal hygiene and grooming;
- Keeping jewellery to an acceptable operations level, and not wearing any jewellery which may present a safety hazard in the relevant environment; and
- Wearing clothing that demonstrates respect to others and is not offensive.

AACo's enforcement of this will in no way conflict with its commitment to anti-discrimination.

AACo expects that its Contractors will ensure that personnel of the Contractor will wear appropriate attire (including safety attire) when delivering their services on an AACo site.

7 The Way We Work

7.1 Gifts, Entertainment and Benefits

Workers may receive or be offered gifts, entertainment or other benefits from an existing or a prospective supplier, customer or other third party. Before accepting, Workers must consider whether the offered gift, entertainment or benefit is appropriate and whether it could compromise their integrity or AACo's reputation. Promotional items of a nominal value may be accepted.

Workers must not accept a gift, entertainment or benefit if:

- It is made in explicit or implicit exchange for favours or benefits;
- It does not comply with relevant local laws;
- It is given to them as an individual (rather than being addressed to AACo in general);
- It includes cash or a cash equivalent items;
- It is given secretly, and may give rise to perceived, potential or actual conflicts of interest; It could be perceived as bringing AACo into disrepute;
- It is offered within three months prior to, or after, the completion of a competitive bid, tender exercise, contract negotiation or the like with the gift giver;

- It is offered more than 4 times per year by the same external party (individual or entity) without the obtained appropriate authority approval to exceed this limit.

Workers must always comply and act in accordance with the [Gifts and Entertainment Policy](#) and ensure to declare offered or received gifts, entertainment or benefits in the Gifts and Entertainment Register and seek approval as per defined thresholds and approval authority levels in the Gifts and Entertainment Policy.

AACo expects its Contractors to ensure that personnel of the Contractor will:

- declare to AACo any gifts or benefits they are offered by a customer or supplier of AACo, in connection with the services that the Contractor delivers to AACo; and
- behave ethically.

7.2 Anti-Bribery, Fraud and Corruption

AACo is committed to conducting business with integrity, transparency, and in compliance with all applicable laws. AACo prohibits bribery, corruption and the making of other unlawful or improper payments that seek to influence any individual or entity in the performance of their role or function. These obligations are applicable to all Workers and Contractors and are outlined in AACo's [Anti-Bribery and Corruption Policy](#).

The following types of improper payments and conduct are explicitly prohibited:

- Bribery of a public official or any other individual or entity in the public or private sector;
- Making of facilitation payments;
- Offering, making, soliciting or receiving of secret commissions;
- Giving or receiving of improper gifts or entertainment;
- Money laundering;
- Encouragement, authorisation or facilitation of bribery or other related improper conduct by another person; and
- False, misleading, incomplete or inadequate accounting or record-keeping.

AACo will not tolerate and form of bribery or the other types of improper payments. You should be aware that bribery and other forms of improper payments may also be unlawful under the laws of the countries in which AACo operates.

AACo also does not permit or condone any form of fraud. Fraud includes any intentional act of dishonesty designed to secure an unfair or unlawful gain. This may involve misrepresentation, concealment, or an abuse of position to obtain benefits for oneself or others at AACo's expense.

Any improper conduct that is detected or suspected must be reported as soon as practicable to the General Counsel & Company Secretary, Head of Risk, Internal Audit & Compliance Officer or reported in line with AACo's [Whistleblower Policy](#). Failure to report known misconduct may itself constitute a breach of this Policy. Individuals who are involved in, or complicit with, any form of bribery, fraud or corruption may face consequences including dismissal from employment, other disciplinary actions, and/or criminal and civil penalties which may carry significant fines or terms of imprisonment.

7.3 Compliance with Laws & Regulations

Compliance with legal and regulatory obligations is a fundamental expectation of all Workers and Contractors. Our business is governed by a broad range of laws, industry codes, and internal policies that shape how we operate responsibly and ethically.

AACo's [Compliance Framework](#) requires that all Workers and Contractors must:

- Comply with all applicable laws, regulations, and AACo policies in their work;
- Understand and adhere to the legal and regulatory requirements that apply to their role, and promptly report any instances of suspected or actual non-compliance breaches; and
- Seek guidance and support from their manager or the Legal or Risk team if they are uncertain about any legal or compliance matter.

7.4 Animal Health and Welfare

Animal health and welfare is central to AACo's operations and reflects our ethical responsibility as one of Australia's largest cattle producers. We are committed to upholding leading animal health and welfare standards across our stations and feedlots.

Workers and Contractors must:

- Adhere to AACo's [Animal Health & Welfare Policy](#) and ethical handling standards at all times;
- Treat animals with care, respect, and in accordance with applicable laws, regulations, and industry best practices; and
- Immediately report any concerns regarding animal health and welfare practices or breaches.

Mistreatment of animals or failure to comply with AACo's animal health and welfare standards is strictly prohibited.

7.5 Environment Protection and Management

AACo is committed to responsible environmental protection, management and business practices. We recognise our role in protecting and preserving natural resources for future generations.

Workers and Contractors are expected to:

- Comply with AACo's environmental policies and relevant environmental laws and regulations;
- Support initiatives that minimise our environmental impact, such as responsible land and water management, waste reduction, and energy efficiency; and
- Act in a way that reflects AACo's commitment to environmental stewardship in all aspects of their work.

Environmental protection, management and business practices are a shared responsibility, and every Worker and Contractor plays a role in ensuring our business operates in an environmentally responsible manner.

7.6 Fair Competition & Ethical Business Practices

AACo is committed to honest, ethical, and lawful business practices. We do not tolerate anti-competitive behaviour, and all Workers and Contractors must comply with competition laws and trade practices regulations.

Prohibited conduct includes:

- Price-fixing, bid-rigging, market allocation, or any form of collusion with competitors.
- Misleading or deceptive conduct, including false advertising or misrepresenting AACo's products or services.
- Abuse of market power or unfair dealings with customers, suppliers, or competitors.

If you have any concerns about business practices that may raise competition law issues, seek advice from the Legal team before taking any action.

7.7 Human Rights & Modern Slavery

AACo is committed to respecting human rights and ensuring that modern slavery has no place in our operations or supply chain.

Workers and Contractors are expected to:

- Uphold human rights and fair labour practices in accordance with AACo's [Modern Slavery Policy](#) and the Modern Slavery Act 2018 (Cth);
- Report any concerns regarding exploitation, forced labour, child labour, or unethical workplace practices; and
- Ensure that business dealings align with AACo's commitments to ethical sourcing and supply chain transparency.

7.8 Making the Right Decisions

At AACo, we expect all Workers and Contractors to act with integrity and make ethical business decisions, considering not only what is legally required but also what is fair, responsible, aligned with, and in the best interests of AACo and its stakeholders.

Workers must:

- Promote the best interests of AACo;
- Conduct themselves professionally;
- Perform duties with skill, honesty, care, and diligence;
- Follow all company policies, procedures, reasonable management and lawful directions;
- Treat colleagues, customers, suppliers, and other stakeholders with respect;
- Consider the ethical implications of their decisions and take accountability for their actions; and
- Speak up if they witness or suspect misconduct, unethical behaviour, or a conflict with AACo's conduct expectations.

Contractors are expected to ensure that they, and their personnel, will:

- Conduct themselves professionally;
- Deliver their services with skill, honesty, care, and to the service standards required;
- Comply with all laws and regulations;
- Engage with Workers (and if on station, Workers' families and guests), customers, suppliers, and other stakeholders professionally, courteously and respectfully;
- Consider the ethical implications of their decisions and take accountability for their actions; and
- Speak up if they witness or suspect misconduct, unethical behaviour, or a conflict with AACo's conduct expectations.

8 Questions, Speak Up and Further Help

8.1 Questions and Speak Up

At AACo, we encourage our team members to speak up when something isn't right or aligned to our conduct and behaviour expectations.

Unwelcome behaviours and breaches of our company policies and this Code of Conduct are not only unacceptable in our workplace; in some instances, they may also be against the law.

If you believe this is happening to you, or another team member, whether by another team member, a team leader, a manager, a customer, or anybody at work, there are informal and formal ways to address this.

AACo's [Grievance Policy](#) outlines options including speaking to the person in question, if you feel comfortable and safe doing so in the first instance. Other ways include:

- Your team leader or manager as your first point of call for any queries, advice or support;
- A member of the People and Culture team for more sensitive or complex people queries or support; or
- Via AACo's Speak Up platform hosted by an external third party, Rely. AACo's Speak Up platform enables you to reach out and make a confidential report (anonymous reporting is also available) regarding workplace issues or concerns. Reports are treated confidentially, and privacy will be protected to the extent possible. The platform can be accessed at www.aaco.com.au/speak-up/ or via the QR Code here.



8.2 Whistleblower Policy

AACo's **Whistleblower Policy** addresses how to make a whistleblower report including in relation to regulatory breaches, criminal or unethical conduct. Reports may be made anonymously, and protections apply to whistleblowers. For further information about the procedures for making such a report, the procedure for investigation and the protections available to whistleblowers, refer to the **Whistleblower Policy**.

AACo does not tolerate any form of retaliation against a Worker or Contractor who makes a whistleblower report or assists in an investigation. Retaliatory conduct against whistleblowers, or suspected whistleblowers, is a criminal offence.

8.3 Employee Assistance Programs

AACo provides a range of counselling and other support services through our Employee Assistance Programs, which offer free, confidential counselling and guidance for Employees and their immediate family. Support is available via phone, video, or in-person sessions. Employees can access this service at any time to discuss personal or work-related challenges.

Australia & Singapore Employees	US Employees	All other Global Hubs
Phone: 1300 AACO ES (1300 2226 37)	Phone: 888.893.5893	Phone: +61 1300 2226 37
Text: 0480 036 060 Email: info@striveor.com	TriNet Member Portal: use code 'trinet' to create a new account. TriNet Mobile App: use the QR Code displayed at the bottom of the Member Portal to download the app	

Employees can access more information about these support services and other external support services via AACo's **Central Station** intranet page.

9 Compliance & Consequences

All Workers are required to comply with this Code. Breaches of this Code and/or the policies that underpin this Code may result in disciplinary action, including but not limited to:

- Coaching and/or retraining.
- Formal warnings.
- Suspension or reassignment of duties.
- Termination of employment.

Serious breaches, including illegal or unlawful conduct, may also result in reports being made to the relevant authorities and legal action being taken against you.

Contractors (or their personnel) who engage in conduct that is inconsistent with the behaviours required, and expectations set out, in this Code may have their contract for services terminated.

Depending on the conduct, Contractors may also be required by AACo to remove the Contractors' personnel from AACo's premises.

If you become aware of behaviour that breaches this Code, you have a responsibility to report it. Reports can be made to:

- Your manager or another leader at AACo;
- The People and Culture team; or
- Through AACo's reporting mechanisms.

Where a report warrants investigation, AACo may investigate matters internally or appoint a third-party investigator. We are committed to a workplace free from retaliation, and no Worker or Contractor will be disadvantaged for raising a legitimate concern.

10 Document Control

10.1 Variations & Questions

This Code will be reviewed as needed or required, or at minimum every three years.

All Workers and Contractors are required to review and acknowledge their understanding of this Code upon commencement of employment or engagement and at regular intervals.

For any questions or further guidance on this Code, please contact the People and Culture team.

10.2 Version History

Policy Information	
Version	Version 7.0 (current)
Owned by	Executive General Manager, People & Culture
Approval Date	23/09/2025
Approved By	Board of Australian Agricultural Company Limited
Related References and Policies	<p>This Code is supported by the following policies which Employees, Directors and Contractors are expected to familiarise themselves with:</p> <p>People & Culture</p> <ul style="list-style-type: none"> • Respecting Each Other at AACo Workplace Behaviour Policy • Diversity Policy • Recruitment Policy and Procedure • Grievance Policy • Personal Relationships in the Workplace Policy <p>Wellbeing, Health & Safety</p> <ul style="list-style-type: none"> • Drugs, Alcohol and Fitness for Work Policy • Motor Vehicle Policy • Smoking Policy <p>Governance</p> <ul style="list-style-type: none"> • Anti-Bribery and Corruption Policy • Conflicts of Interest Policy • Whistleblower Policy • Information Retention Policy • Privacy Policy • Compliance Framework • Gifts and Entertainment Policy • Modern Slavery Policy

	Information Technology <ul style="list-style-type: none"> Information Security and Access Policy Animal Welfare <ul style="list-style-type: none"> Animal Health & Welfare Policy
Next Review Date	23/09/2028

Document Control	
Version	Version 7.0 (current)
Document Number	GOV-01-V7.0
Date	23/09/2025
Section Modified	Full revision of the previous version of the Code of Conduct
<i>Version</i>	<i>Version 6</i>
<i>Date</i>	<i>October 2019</i>