



## Bega Cheese Limited's Standards of Business Conduct

### A Commitment to Operate with Integrity

Bega Cheese Limited sets consistently high standards of business conduct and ethics. We aim to deliver strong business results, whilst ensuring that we never compromise our values.

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#### Code of Conduct

The Bega Cheese Code of Conduct outlines the responsibilities that employees, contractors, consultants and Directors have to Bega Cheese. The Board of Directors and management of Bega Cheese recognise the need for Bega Cheese to observe the highest standards of corporate practice and business conduct in Bega Cheese's interaction with its customers, shareholders, employees, suppliers, business partners, the community and the environment in which Bega Cheese operates.

The Board has endorsed the Code of Conduct as part of Bega Cheese's corporate governance framework.

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### Corporate Responsibility Principles

The Company is committed to conducting business in an ethical manner. To ensure that the Company works with suppliers that share this commitment, the Company has established corporate social responsibility and other supplier requirements that are described below. Supplier's must comply with these requirements at all times. Bega Cheese expects our suppliers and customers to adhere to applicable legal requirements in their business relationships, including those with their employees, their local communities and Bega Cheese.

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#### Child Labour and Forced Labour

The Supplier does not and will not employ children in the workplace nor use forced labour, which means any work or services performed involuntarily under threat of penalty. The Supplier must comply with the minimum employment age limit prescribed by laws of the relevant jurisdiction or any international treaty or convention applicable in or adopted by Australia.

#### Safety and Health

In addition to the applicable legal protections, the Supplier's employees must be appropriately protected from exposure to hazardous materials and unsafe working conditions and must have access to potable water and clean sanitation facilities.

#### Working Hours

In addition to complying with all applicable local, state and national laws, the Supplier must adhere to commonly accepted industry standards on working hours. While recognising the need to address legitimate seasonal or other variations in business demands, the Supplier must:

- (a) maintain a reasonable overall pattern of required working hours and days off for its employees so that total work hours per week do not regularly exceed industry norms;
- (b) pay fair and timely compensation, including any premium payments required for overtime work; and
- (c) advise employees when hired if mandatory overtime is a condition of employment.

### **Wages and Benefits**

The Supplier must provide wages (including any premium payments required for overtime work) and benefits that equal or exceed those required by applicable local, state and national laws and regulations.

### **Non-Discrimination**

The Supplier must hire, compensate, promote, discipline and provide other conditions of employment based on an individual's performance and ability to do the job. The Supplier must not discriminate based on a person's race, sex, age, nationality, marital status, ethnic origin or any other legally protected status.

### **Harassment and Abuse**

The Supplier must provide a workplace free from harassment, which can take many forms, including sexual, verbal, physical or visual behaviour that creates an offensive, hostile or intimidating environment.

### **Disciplinary Practices**

The Supplier must not use corporal punishment or other forms of mental or physical coercion as a form of discipline.

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### **Fair Business Practices**

Bega Cheese aims to compete effectively and fairly in the markets in which it operates. It will be honest, ethical and responsible in the way it presents products and services to its customers, uses its market power and its pricing practices.

Bega Cheese expect that as a valued business partner, the business we deal with will have policies that promote similar ethical practises and that compliance with all applicable laws and regulations will be monitored.

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### **Fraud and Corruption**

Any acts of fraud, corruption, misappropriation and deception are unacceptable. Compliance with fraud and corruption policies, anti-corruption laws and other associated laws and regulations is a condition of employment or association with Bega Cheese.

Bega Cheese will not tolerate any acts or attempted acts of fraud or corruption in any form whether direct or indirect.

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### **Compliance Framework**

In view of Bega Cheese's commitment to strong corporate governance, we are keen to encourage a culture in which people want to work and workplace misconduct is identified and reported.

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## **Ethics and Compliance Service**

Employees are encouraged to report any concerns they have about possible wrongdoing such as theft, fraud, dishonesty, harassment or unethical behavior or workplace safety hazards to a Supervisor, a Manager, ESO Officers or Human Resources. If the employee feels their concerns are not being dealt with or they do not feel comfortable to discuss, external reports per below can be made.

### **Open Communication**

At Bega Cheese, we maintain open channels of communication with our staff, suppliers, customers and other key stakeholders. It is important to us that our business partners, staff and stakeholders adhere to our Values and comply with all applicable laws and regulations. If you are aware of any actual or potential violation to Bega Cheese's Standards of business conduct or of any applicable law, we ask that you report the violation immediately as prescribed below in 'External Reports of Wrongdoing'.

### **External Reports of Wrongdoing**

Reports of suspected wrongdoing may be brought to our attention via our fully outsourced independent Whistleblower service that operates 24 hours a day, 7 days per week. The service provides independence and the option of anonymity. The service can be contacted in one of five ways:

**Phone:** 1800 173 918 (within Australia)

**Website:** [www.whistleblower.deloitte.com.au](http://www.whistleblower.deloitte.com.au)

**Email address:** whistleblower@deloitte.com.au

**Post to:** Bega Cheese – Deloitte Whistleblower Service,  
Reply paid 12628, A'Beckett Street,  
Melbourne. Victoria 8006

**Fax:** 03 9691 8182