



Select Harvests Ltd

CODE OF CONDUCT & GUIDELINES FOR ETHICAL BEHAVIOUR

Revised February 2014





SELECT HARVESTS – CODE OF CONDUCT & GUIDELINES FOR ETHICAL BEHAVIOUR

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SELECT HARVESTS CODE OF CONDUCT

A 'Code of Conduct' guides both new and existing employees as to how they deal with clients, buyers, sellers, the public, industry partners, contractors and their fellow employees as well as what is required to maintain strong ethical standards.

As Select Harvests' employees we are all charged with a responsibility to serve the organisation effectively and with courtesy and respect for the rights and entitlement of everyone we deal with. Similarly we have a duty to respect and support each other in our endeavours to provide excellent service.

I commend the Select Harvests' Code of Conduct to you as a helpful set of principles and guidelines that you can refer to at times where there is some doubt as to how an issue is to be addressed. The document has the complete support of both the Board of Management and the Executive Team.



Paul Thompson
Managing Director

11th February 2014

OUR CODE OF CONDUCT

A Personal Responsibility

Select Harvests is committed to ensuring that its employees exhibit the highest level of personal integrity and honesty, and providing superior service.

This can only be achieved through the commitment of all management and employees. Obligations and responsibilities fall equally on the management team and every one of its employees.

In adhering to the code of conduct, all management will:

- Respect every employee's dignity, rights, freedoms and individual needs;
- Provide a working environment that is safe, challenging and rewarding;
- Recognise the work of each of our employees;
- Reinforce the organisation's commitment to the highest standards in business and professional ethics;
- Obey the law.

In adhering to the code of conduct, all employees will:

- Treat clients, business partners, contractors, the public and fellow employees with honesty, courtesy and respect;
- Respect and safeguard the organisation's property and that of fellow workers;
- Maintain confidentiality of all employee related, customers', Select Harvests' or other parties' information gained through our work;
- Perform our duties, as best we can, taking into account our and other employees' skills, experience, qualifications and position;
- Do our jobs in a safe, responsible and effective manner;
- Ensure our personal business and financial interests do not conflict with our duty to Select Harvests;
- Work within the Select Harvests' policies, procedures and rules;
- Obey the law.

As employees, we publicly represent Select Harvests at all times, regardless of our own personal views on decisions made by Select Harvests and/or management.

With all Select Harvests management and employees committed to undertake these obligations and responsibilities, the workplace, job satisfaction and performance will benefit and encourage better achievement of Select Harvests' business goals.

Employees and Management who disregard the guidelines are subject to disciplinary action, including instant dismissal for gross misconduct.

GUIDELINES FOR ETHICAL BEHAVIOUR

The following sections provide conduct guidance in relation to specific topics. The summary should be read in conjunction with the related company policy available from the Human Resource Department or the Corporate Document Management System (F/Drive).

All employees are to also acquaint themselves with the company's Conflict of Interest Policy and General Conditions of Employment.

<i>Topic</i>	<i>Expected Behaviour</i>
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ALCOHOL & DRUGS

Consumption or storage of alcohol or non-prescribed drugs at work is not allowed. The use of alcohol or drugs that might affect anyone's safety, including our own, other staff, our work, public relations, or violate state drug, drinking and driving law is not permitted. No alcohol or non-prescribed drugs are to be stored at any worksite.
(Reference – Alcohol & Drug Policy).

CLAIMS & COMPLAINTS

In responding to any claims or complaints against Select Harvests, we will politely investigate the issue objectively and ensure that the complainant is kept informed of progress. It is a matter of assessing the real situation not “defending” the Select Harvests’ perceived position.

CONFLICT OF INTEREST

A conflict of interest exists where loyalties are divided. It is expected we will guard against any possibility of conflict of interest in employment. If we think there is a possible conflict of interest in relation to our employment, we will discuss it with our Department Manager.

Select Harvests is a very large buyer of raw materials and services and awards its business strictly on the basis of suitability and price. The company also provides raw materials and manufactured products to its clients based on a competitive framework.

When involved in buying or selling of goods and services on the company's behalf we will avoid any relationship, financial or otherwise, with suppliers and clients that could be seen as unfairly influencing judgment.

If we have a pecuniary interest it must be declared immediately to our own General Manager.

(Reference – Conflict of Interest Policy).

CUSTOMER SERVICE

All employees will maintain a high level of customer service in their dealings with one another, clients, suppliers and others. The delivery of excellent service is a standard all employees are tasked with.

A customer with an ‘issue’ is to be treated with respect and their concern/s addressed expeditiously and fairly.

<i>Topic</i>	<i>Expected Behaviour</i>
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**EEO,
HARRASSMENT
& BULLYING**

Select Harvests has a number of policies and procedures that impact on how we deal with one another. These include:

- 1 Equal Employment Opportunity, Harassment and Bullying Policy & Procedures.
- 2 Workplace Fair Treatment Policy

These policies and procedures are contained in Select Harvests's Human Resources Policies & Guidelines. They are subject to review at all times as a result of changes to, or the further application of, any relevant legislative or award provisions. Select Harvests's policies and procedures need to be read in conjunction with the relevant award and/or legislation, and any concern regarding their application is to be referred to the Human Resources Manager.

Select Harvests's Equal Opportunity Objectives

- To eliminate discrimination and harassment in the workplace and Select Harvests practices
- To create a workplace that is free of discrimination and victimisation where each person has the opportunity to progress to the full extent of their ability
- To ensure that staff are made aware of their rights and obligations within equal opportunity principles and practices
- To provide a mechanism which enables any reports of discrimination, harassment, bullying and victimisation to be investigated thoroughly and confidentially.

It is unlawful for anyone to discriminate against, harass or bully others, and an individual may be subject to disciplinary processes or held personally and legally liable for any action brought by another person.

(Reference - Equal Employment Opportunity, Harassment and Bullying Policy & Procedures and Workplace Fairness Policy)

Topic

Expected Behaviour

FAIR COMPETITION

Fair competition means that we will:

- ⇒ know about and follow the Select Harvests' legal obligations and purchasing, contracting, capex policies and procedures;
- ⇒ compete on the basis of customer service and non-obstructive competitive conduct.

As part of our commitment to fair trading, Select Harvests' management and staff will:

- not unfairly differ between customers when supplying products or services.
- not refuse to deal with, or discriminate against, a customer for any improper reason.
- not intimidate or threaten another person or organisation, and;
- only use our Select Harvests's strength in legitimate ways.

We aim to be an effective competitor and to deliver services according to accepted industry and ethical standards.

No bribes, payoffs or kickbacks will be paid or accepted. In all dealings with others, we will be courteous well-informed and truthful and careful not to misrepresent the quality, features or availability of our services.

Competitive information will be obtained only by ethical means. Unethical covert attempts to gain or provide competitive information are not permitted.

FUNDS

Every employee who has control of Select Harvests funds is personally accountable for them.

"Funds" can mean electronic funds transactions, cash or valuables such as cab charge vouchers, gift vouchers, fuel/petrol charge cards. Misuse will be treated as a serious breach of discipline. Theft of any item purchased via company funds is also not acceptable.

IMPROPER INFLUENCE

No pressure is to be put on employees to influence their personal preferences in private or political matters. Further, no approval, disapproval or judgement should be expressed by an employee of another employee's private political or personal preferences or activities

Topic

Expected Behaviour

LAW

Select Harvests is subject to Municipal, State and Federal laws. We have a duty to act within the law. The law helps to define our role within Select Harvests.

No one can be directed to carry out an illegal act, and no one can justify an illegal act or unethical action by claiming to be acting under the order of a manager, senior officer, or to be simply complying with policy. An employee or officer of the organisation is also not to commit a fraudulent or malicious act.

An employee who is detected performing an illegal act will be subject to disciplinary action and may also be subject to legal action.

All employees are encouraged to immediately report illegal actions by others to their Manager, General Manager or HR Manager. Confidentiality will be maintained when such reports are made.

LEAVING SELECT HARVESTS' EMPLOYMENT

On leaving or retiring from Select Harvests, you must hand over to your Manager any Select Harvests assets or items containing Select Harvests information.

Even after leaving Select Harvests, you have a continuing obligation to maintain the confidentiality of issues and projects learned about whilst employed by Select Harvests unless you have sought and obtained written consent from the company to utilise such information.

OUTSIDE EMPLOYMENT & OTHER ACTIVITIES

In taking up external duties or activities not related to your employment with the company, you will ensure the following is maintained:

- Keeping our involvement in outside activities separated from Select Harvests work (Refer to Conflict of Interest Policy)
- Discussing your options with your Manager when you are considering additional external employment.
- Involvement in external work or non-work activities will not involve use of Select Harvests's property, information, money, facilities, time or the services of fellow workers; and

Avoiding outside activities that are likely to affect either your work or someone else's, or which could discredit either Select Harvests, or which would be considered in conflict of Select Harvests' interests.

<i>Topic</i>	<i>Expected Behaviour</i>
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PERSONAL CONDUCT

Our personal conduct is to be consistent with our Code of Conduct.

We will deal fairly and honestly with clients, each other, business suppliers and competitors.

This means:

- Handling all internal and external client contacts with professionalism and courtesy;
- Reporting to work as scheduled, keeping absences to a minimum and, when an absence is necessary, promptly notifying our Manager of the reason.

To ensure a productive and safe workplace, the following are not permitted:

- Working in an unsafe manner.
- Misusing or adjusting Select Harvests property, plant, equipment or services. (eg, telephone, email).
- Smoking in Select Harvests buildings & vehicles.
- Using, possessing or trafficking illegal or unprescribed drugs.
- Having possession of or consuming alcohol on a work site or having a blood alcohol level that might affect anyone's safety or Select Harvests's image in the community.
- Using offensive language or unwarranted or violent physical behaviour.
- Harrassing, intimidating or abusing others in any manner.
- Using access of the company's or own electronic social media to intimidate, denigrate or pass any judgement on company or another employee's activities which may bring the company into disrepute.
- Using any equipment or plant which we are not authorised, trained or accredited to use.

PROPERTY

We all share the responsibility for looking after Select Harvests' property, especially if it is under our control.

Select Harvests property must not be removed without authorisation or used for personal benefit or any other improper purpose.

The Select Harvests's property may only be given away, lent, destroyed or otherwise disposed of, if this action is properly authorised in writing, no matter how old or damaged an item may be. The relevant asset register must be appropriately noted.

**Topic****Expected Behaviour**

**PRIVATE & WORK
RELATED
COMPANY
VEHICLE
USAGE**

Anyone using a Select Harvests' vehicle must ensure that it is not used in a way that will reflect badly on Select Harvests. Vehicles must not be used for unauthorised purposes.

Only employees who have been given prior authorisation and have a current and appropriate Drivers Licence may drive Select Harvests' vehicles.

An employee who has been given prior authorisation may use their own vehicle for work related purposes, however, such vehicle/s must be roadworthy and insured.

A company vehicle which is issued to an employee inclusive of travel to and from work shall only be used within those parameters. Where an employee does not have access to their own vehicle, approved limited additional week-end or approved holiday use of the company vehicle shall be subject to the employee paying for fuel at their own expense. A company vehicle is not to be used in lieu of your own vehicle for shopping or other purposes. It is also not to be lent to a family member for non-work related usage.

An employee issued with a company vehicle shall maintain a log book to record travel and purpose of each trip.

**PRIVACY OF
COMMUNICATION**

Customers and employees expect their communications with Select Harvests to be kept secure and confidential. The Privacy Act 1988 also provides sanctions against improper use of confidential information.

As a Select Harvests employee, we will not:

- Disclose any confidential information for any reason other than the purpose it was collected for;
- Use any information to our personal advantage;
- Permit unauthorised persons access to information not concerning them.

Requests from police, government agencies or anyone outside Select Harvests, for information about employees or customers, is to be directed to the relevant HR Manager or General Manager.

(Reference – Privacy Policy 2014)

**PROTECTION OF
INFORMATION**

As employees, we maintain the privacy of Select Harvests information and protect it from any disclosure. The majority of our information relates to clients and suppliers, who expect, on both legal and ethical grounds, that this information will be protected.

**Topic*****Expected Behaviour***

QUALITY

All employees have an obligation to ensure that products or services which do not meet the required standard are identified and reported to the appropriate management level.

Select Harvests is committed to supply its customers with goods which meet or exceed the required specification.

(Reference – Quality Assurance Policies and procedures)

SAFE WORK ENVIRONMENT

Select Harvests is committed to provide its employees with a working environment which is healthy, safe and productive. Beside physical factors, our work environment should also be challenging, stimulating and rewarding for us all.

All employees are obliged to participate in the organisation's Occupational Health & Safety programs which are implemented for each specific site.

Under the Occupational Health & Safety Act (Federal and State) it is illegal for anyone to do anything that may endanger themselves or others.

Your manager or team leader can advise you of safety and induction training that is specific to your area. Your local safety instructions must be observed at all times. If in doubt, ask your team leader or manager and if necessary, specialist or technical advice may also be available through the HR Department.

It is everyone's obligation to maintain a safe work environment and any hazard must be immediately attended to or reported to the appropriate supervisor/manager.

(Reference – OH&S Policy and related procedures)

Topic	Expected Behaviour
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SOCIAL MEDIA

Social media, that is, email, Facebook, Twitter or other communication through various means of electronic devices such as computer, laptop, phone or iPad etc, is an accepted means of individuals and organisations exchanging information.

Unfortunately this communication avenue is sometimes used to denigrate, embarrass or harass others. Such usage is not sanctioned and may result in disciplinary action. Use of personal devices for inappropriate activities, whether in company or own time, may breach another employee's or the company's confidentiality, ethics and/or trust. It is therefore important that all employees understand that inappropriate behaviour at or outside work has potential employment and perhaps legal consequences.

All employees need to be aware that work related use of communication options is generally for work related purposes, however limited personal usage in lunch breaks etc for legitimate purposes is appropriate.

Any storage of personal data on company systems is not appropriate and all storage systems are subject to access by company authorised officers.

(Reference- Social Media Policy)

**SUSTAINABILITY
&
ENVIRONMENTAL
PROTECTION**

In accordance with Select Harvests' Sustainability Policy & the Environment Policy, the company is committed to fulfilling its moral and legal environmental responsibilities related to, but not restricted to:

- Air borne particulate and gas discharge
- Sewer and drainage discharge
- Non-renewable natural and generated resources such as fuel, water, electricity and gas.
- Recycling of materials and waste minimisation.
- Land usage and reclamation.
- Carbon Emissions
- Maintaining a sustainable environment

All employees have a responsibility to enact the company's environment and sustainability policies in their immediate work activities and areas of influence.

(Reference – Environment Policy & Sustainability Policy)

** If you have any questions or would like further information about the Select Harvests Code of Conduct, please contact the Human Resources Department.*