



FRESH PRODUCE GROUP CODE OF ETHICS



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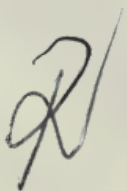
This statement applies to all employees and stakeholders of Fresh Produce Group of Australia (ABN 87 055 359 601), Fresh Produce Group Western Australia (ABN 81 152 973 932), Treviso Farm Management (ABN 31 144 899 276), and Tumut Grove Farm Management Pty Ltd (ABN 46 619 756 115), collectively referred to as 'Fresh Produce Group' or 'FPG'.

A NOTE FROM THE CHAIRMEN OF THE BOARD

Fresh Produce Group is a company built on honesty and integrity. These core values are part of our DNA and we hold ourselves accountable to them in every aspect of the business including staff, customers, suppliers, community, our land and the environment.

Our workplace practices are respectful of any and all people that participate within or along side of Fresh Produce Group. Workplace regulations are constantly evolving and our teams work hard to ensure that we are always abiding by new regulations and adapt our workplaces accordingly. This includes meeting all obligations we have towards the health and safety of staff, customers, and consumers.

Living by our code of ethics ensures a foundation of integrity, honesty, respect and accountability. This allows us to gain the highest level of respect from all those who engage with and work within Fresh Produce Group. Our code of ethics reinforces how we treat each other and helps us to understand what is needed to make sure each and every person feels safe in the FPG workplace.



Robert Nugan

Executive Chairman



Anthony Poiner

Executive Chairman



COMPANY MISSION, VISION AND VALUES

Our Vision

To be recognised as the best performing fresh produce partner.

Our Mission

To understand future consumer demands and continually challenge ourselves to offer successful solutions.

Our Mission

Fresh Produce Group, as a company, is committed to our core values of;

Honesty – we act fairly, with integrity and respect.

Excellence – We strive daily to excel in both quality and service.

Resilience – We are determined, optimistic and focused on solutions.

Accountability – We take personal ownership of our decisions and outcomes.

Partnership – We think and act as one team with our customers, suppliers and our people. We value long term partnerships.

Passion – We pride ourselves in delivering industry leading results for our customers, suppliers and our people.

ETHICAL STANDARDS AND POLICIES

Anti-Bribery and Corruption

Fresh Produce Group complies with and upholds Australian and international legislation against bribery, corruption and related conduct in all jurisdictions where the company operates. These laws reflect our own values and views on the matter.

Our commitment to anti-bribery and corruption is regularly monitored through multiple internal and external vehicles. Firstly, Fresh Produce Group performs our own internal reviews to ensure business practices are robust in deterring and identifying internal corruption. This includes but is not limited to, closely monitored payment processes, our company-wide whistle blower policy for anonymous reporting and reviews of our contracting partners. These efforts are reinforced by external audits such as SEDEX, whose regulations we are compliant with across all areas of the business.

Compliance with Laws and Regulations

As a company, Fresh Produce Group is compliant with all federal and state laws as well as all international laws in all jurisdictions where the company operates. We undertake annual reviews of company policies and procedures to ensure they remain relevant and valid under state and federal legislation as well as the relevant industry awards. We are also compliant with many industry regulatory bodies including SEDEX, Global Gap and Fresh Care.

Fresh Produce Group has identified local laws for trading domestically and with companies located outside of Australia. We do not trade with any companies located in or associated with sanctioned countries including those outlined by the United Nations Security Council and the Australian Federal Government.

Dispute Resolution

Our dispute resolution procedure is readily available to all employees via the company intranet. This procedure outlines several steps employees can take to resolve disputes depending on the severity of the matter. Included in the document is contact information for external bodies that may aid in a dispute such as the Fair Work Ombudsman and the Human Rights Commission.

Fresh Produce Group aims to provide clear and simple managerial hierarchy for all employees. This helps to provide clarity around points of contact should any disputes arise. All employees are also encouraged to contact the central Human Resources team with any issues of a more serious nature. This team is easily contactable and individual Human Resource officers are assigned to each area of the business for continuity and specialised support.



Ethical Sourcing of Labour

Our workforce is an integral part of Fresh Produce Group's operations. We ensure all employees are hired based on merit in accordance with their skills, qualifications and abilities. We ensure only individuals with the right to work are employed by the company, using rigorous verification processes, as outlined in our Verification of Entitlement to Work policy. For those who are not Australian citizens, our company ensures strict compliance with all visa restrictions, limitations or conditions.

All employment under Fresh Produce Group is consistent with international standards outlined in the Ethical Trading Initiative Base Code (ETA Base Code). This includes ensuring all employment is freely chosen, and, all employees are provided with a living wage in accordance with the Fair Work Act 2009 and relevant modern awards, contracts, industrial agreements and other laws.

Fresh Produce Group has been participating in the PALM Scheme since 2018. As such, we are compliant with the relevant government deed and guidelines. Strict controls are managed by our Human Resources team and dedicated on-site staff whose focus is on the welfare and wellbeing of seasonal workers. Due to the nature of PALM Scheme employment, it is important for us that all workers understand the scheme and any requirements that come with it. These workers are able to cease work at any time, at which stage, they are returned to their home country.

To ensure compliance, Fresh Produce Group internally audits all labour hire providers as well as complying with SEDEX audits that assess ethical work conditions and practices of direct and labour-hire employees.

For more information, see our Modern Slavery Statement.

Ethical Trading

In line with our key value of "Partnership", Fresh Produce Group's grower, supplier and customer relationships are incredibly important to us. Ethical trading is a key cornerstone of these relationships and therefore, every employee must act honestly, respectfully and with integrity.

Our Ethical Trading Policy is consistent with local laws and international standards outlined in the Ethical Trading Initiative Base Code (ETI Base Code). This policy applies to all full-time part-time or casual employees as well as contractors, volunteers, vocational and work experience placements.

Key elements of the Ethical Trading Initiative Base Code (ETI Base Code) include;

- Employment being freely chosen
- The freedom of association and the right to collective bargaining
- Providing safe and hygienic working conditions
- Not using Child Labour, in accordance with local laws and our Young Worker and Child Labour Policy where no minimum age exists.
- Providing living wages in accordance with Fair Work Act 2009 and relevant modern awards, contracts, industrial agreements and other relevant laws.
- Ensuring working hours are not excessive, and where long working hours and days are required, ensuring that appropriate safeguards are in place to protect workers health and safety.
- Ensuring no discrimination is practiced based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation.
- Providing regular employment where possible.
- Ensuring no harsh or inhumane treatment towards workers is allowed.
- Compliance with SEDEX regulations



Health and Safety

Our company is committed to providing a safe working environment in alignment with relevant state legislation, including;

- Work Health and Safety Act 2011 (NSW)
- Work Health and Safety Act 2011 (Qld)
- The Occupational Health and Safety Act 2004 (OHS Act) (VIC)
- Work Health and Safety Act 2012 (Tas)
- Work Health and Safety Act 2020 (WA)

This legislation is reflected in our processes and procedures that are communicated with employees, including during induction and in the Employee Handbook. We undertake regular training and drive awareness through consultation with stakeholders. Our goal is to provide a safe and healthy work environment, this is achieved through participation, contribution, cooperation and commitment of everyone in our workplace.

Modern Slavery

Fresh Produce Group reports under the Modern Slavery Act 2018 and our Modern Slavery Statement is published online on the Australian Government's Modern Slavery Register. In line with this statement, our company ensures all forms of employment are free from human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

All employees are educated on modern slavery and their rights during their induction. Additionally, all staff in our technical compliance and produce trading departments have completed modern slavery training modules online.

Privacy and Confidentiality

As a company, Fresh Produce Group respects and safeguards the privacy of personal information held by the company regarding its clients, customers, suppliers, employees and others. If employees have access to this information, they must take all reasonable steps to ensure it is collected, kept, disclosed, handled and used in a manner that complies with the Privacy Act 1988 (Cth), Australian Privacy Principles and any other relevant federal or state laws.

We retain the information provided to us by employees, customers and contractors including personal details, contact information and bank details to enable us to verify transactions and, retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities. Once information is no longer required by us, it is de-identified or destroyed securely.



Responsibility to Stakeholders and Investors

Fresh Produce Group recognises our responsibility to all of our Stakeholders. This includes Investors, Customers, Suppliers and broader society. At all times we operate in line with our company values and focus on doing the right thing.

The Group's governance model is specifically structured to ensure direct shareholder input as well as independent oversight of our actions. We operate to the benefit of all our investors equally. Senior management remuneration is directly linked to the outcomes the Group achieves in order to ensure alignment between management and shareholder outcomes.

Strategic decisions are made having regard for the Group Environmental Social Governance (ESG) approach. This provides the opportunity to consider the impact of our actions on the broader stakeholder group as well as the environment.

Supply Chain Integrity

Our supply chain and supply chain integrity is an integral part of our business and the horticulture industry at large. Fresh Produce Group is compliant with external programs such as SEDEX while also running our own internal audits to maintain visibility and strict compliance. These internal audits are extended to contactors, such as labour providers, with whom we clearly communicate expectations of the agreement. In the event that expectations are not met, the company will cease partnerships.

Where reasonably practical, Fresh Produce Group expects that suppliers are ensuring their practices respect human rights and implement the principles of the Ethical Trading Initiative Base Code (ETI Base Code) in their own organisations and throughout their own supply chains.



Whistle-Blower & Reporting Protection

Fresh Produce Group's whistle-blower policy is designed to promote and reinforce our expectations for company culture, ethics and workplace conduct. This information is shared with all employees during induction and links to our anonymous reporting form are available on our intranet.

This policy encourages employees to raise concerns about misconduct, malpractice, irregularities or any other behaviour that is considered dishonest, corrupt, illegal or inconsistent with our company values and acceptable workplace conduct. The anonymity provided in this mechanism allows employees to raise these concerns without fear of victimisation, harassment or discrimination.

Unacceptable Workplace Conduct

Fresh Produce Group has a zero-tolerance policy on discrimination, harassment, sexual harassment, bullying or victimisation. Additionally, our company sets strong standards on workplace conduct in general, promoted through workplace behavioural training and our Workplace Conduct Policy. All expectations are clearly communicated with all employees and temporary workers through inductions and the Employee Handbook. Our Whistle-blower Policy and Dispute Resolution Policies are made available via our company intranet to enable employees to report any unacceptable workplace behaviours they may witness.

We ensure all our policies and behaviours are consistent with local laws and international standards outlined in the Ethical Trading Initiative Base Code (ETI Base Code), including ensuring no discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

All leaders within the company are expected to develop a culture of inclusivity and equality. This is practiced through out their teams as well as through relationships with external parties. All Senior Leadership Team members are held accountable by the standards of the Senior Leadership Charter which clearly sets out acceptable and unacceptable workplace behaviours.

Young Workforce and Child Labour

As outlined in our Young Workforce and Child Labour Policy, our company will only employ workers of legal working age as outlined by relevant state legislation. Where no minimum working ages exist, Fresh Produce Group will not employ workers of mandatory school age without written parental or guardian consent. These young workers will not be permitted to work during school hours or excessive and/or disruptive hours including night shifts or excessive overtime. Additionally, Young workers will not engage in hazardous tasks.