



Code of Conduct

Freedom Foods Group Limited
ACN 002 814 235

Updated: November 2020

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1 OVERVIEW

- 1.1 Freedom Foods Group Limited ACN 002 814 235 (**Company**) and its subsidiaries (**Group**) are committed not only to complying with their legal obligations, but also to acting ethically and responsibly. The Company expects a high level of honesty, care, fair dealing and integrity in the conduct of all business activities.
- 1.2 This code of conduct (**Code**) is not intended to be exhaustive, but sets the minimum standards of conduct expected of all directors, officers, executives, employees and contractors of the Group (collectively **Employees**).

1.3 STATEMENT OF VALUES

- (a) The Company and Employees are required to conduct their activities and act in accordance with the Company's Statement of Values.
- (b) These values are:
- (i) **People First** – We genuinely care about our people, our stakeholders, our communities and our environment. We have a positive impact on each other. Safety and quality underpin our success.
 - (ii) **Customer Centric** – We are passionate about creating high quality products that our customers love and trust. Together we build mutual value for our customers and all our partners and stakeholders.
 - (iii) **Integrity and Respect** – We do the right thing. We are authentic, honest and disciplined. We build a climate of mutual trust, respect and confidence in each other and with our stakeholders. Integrity and honesty are at the heart of our business. We expect high ethical standards
 - (iv) **Courage and Accountability** – We have unswerving courage to speak up for what is right. We act like owners and are accountable for outcomes. We share mutual responsibility, accountability and success.
 - (v) **Collaboration** – We work collectively to build a great culture and deliver great results. Through collaboration we are nimble and empower each other to drive creativity, innovation and positive outcomes. We value teamwork in everything we do.

2 EXPECTATIONS

2.1 General Expectations

All Employees are expected to:

- (a) act in the best interests of the Group;
- (b) act ethically and responsibly;
- (c) act honestly and fairly in all commercial dealings and conduct themselves with professional courtesy and integrity in their dealings with other Employees, customers, suppliers and other stakeholders of the Company;
- (d) encourage a corporate culture that recognises the benefits of maintaining diversity among people in the Group at all levels in relation to gender, race, ethnicity, disability,

age, sexual orientation, gender identity, marital or family status, religious or cultural background among others;

- (e) comply with all laws and regulations that apply to the Group and its operations;
- (f) report any circumstance which is believed, in good faith, to be a breach of a law or this Code; and
- (g) avoid entering into any arrangement or participating in any activity that would conflict with the Group's best interests or that would be likely to negatively affect the Group's reputation.

2.2 Conflicts

- (a) Employees must avoid situations where their personal interest conflicts with, or could reasonably be perceived to conflict with, the interests of the Group.
- (b) A conflict of interest may exist if your interest in the outcome of a matter or a decision may be incompatible with or in conflict with the interest of the Group in that matter or decision. If an Employee is uncertain as to whether they have a personal interest that conflicts with, or may conflict with, the interests of the Group, that Employee should seek guidance from the General Counsel.
- (c) All potential conflicts of interests must be reported to the Risk and Compliance Committee of the Company.
- (d) The Risk and Compliance Committee must report breaches of this Code to the board of directors of the Company (**Board**).

2.3 Corporate opportunities

Employees must not take advantage of their position, Group information or opportunities arising from these, for personal gain or to cause detriment to the Group or its customers.

2.4 Company Assets and Property

All assets of the Group are to be properly used in the interests of the Group and safeguarded from loss or misuse.

2.5 Confidential Information

- (a) Confidential or commercially sensitive information is not to be disclosed without proper authorisation.
- (b) Employees must comply with continuous disclosure obligations at law and are required to be fully aware of and observe their responsibilities under the Company's Continuous Disclosure Policy.
- (c) Securities trading by Employees must be conducted in compliance with the Company's Securities Trading Policy.

2.6 Personal gains, gifts and other payments

Employees must comply with the Company's Anti-Bribery and Anti-Corruption Policy.

3 REPORTING

- 3.1 Any circumstance, which an Employee believes, in good faith, to be unethical or a breach of the law or this Code, is to be brought to the attention of a member of the senior leadership team.
- 3.2 The identity of any person reporting such breaches is to remain confidential unless disclosure is required by law. The Company will ensure that Employees are not disadvantaged in any way for making a report.

4 COMPLIANCE WITH THE CODE

- 4.1 The Board is responsible for monitoring and ensuring compliance with this Code.
- 4.2 The Board is responsible for providing training to Employees on their obligations under this Code.
- 4.3 Reports of violations of this Code or any other unlawful or unethical conduct are to be investigated and dealt with promptly by the Board, and in accordance with the principles of natural justice.
- 4.4 Failure to comply with this Code or any other laws or regulations applying to the Company, may result in disciplinary action, including in serious cases, the termination of employment.

5 REVIEW

The Board is responsible for conducting reviews of this Code at least annually to ensure that it accords with best practise and remains consistent with its objectives.

Date: November 2020