



Ridley Corporation Limited Code of Conduct

PURPOSE

The Ridley Corporation Limited (**Ridley**) Code of Conduct (**Code**) provides a clear and unambiguous framework within which all directors and employees are expected to operate. It emphasises our absolute commitment to **employee health and safety** and the fundamental importance of protecting the Ridley reputation for **integrity** in all that we do.

Ridley has engaged an external independent service provider, **Faircall** who can be contacted on **1800 500 965** to enable serious breaches of the Code to be reported. If you contact **Faircall** your identity will only be disclosed to Ridley with your approval. We are all ambassadors for Ridley. If we are to continue to succeed, we must be able to attract the best people and ensure that we provide them with the **safest possible working environment**. By providing clarity about what we stand for and by relentlessly protecting our reputation, we can only help this process.

We wish to be valued as an employer and business associate in all our relationships. The Ridley Code is not an attempt to tell people how to behave outside their role within Ridley, nor does it presume to influence anyone's personal beliefs. However, the Code does outline the minimum standards of behaviour expected of each of us whilst representing Ridley. All Ridley directors and employees are expected to comply with the Code.

The Code is based on shared values and on actively encouraging behaviour that will help rather than hinder our development as a business. We care about how we get results.

Lastly, but equally importantly, we firmly believe that the values and behaviour outlined in our Code accord with those of the communities in which we operate.

THE SIX PRINCIPLES OF THE RIDLEY CODE

At Ridley, we apply the following six principles to our relationships with each other and to our relationships with everyone we deal with in our work for Ridley.

1. We are all responsible for acting, and ensuring others act, in accordance with occupational health and safety and environmental rules and policies at all times.
2. We always treat each other with dignity and respect.
3. We comply with the law in all the countries and territories where we operate.
4. We are honest and fair and ensure that our behaviour is beyond reproach in all our dealings.
5. We use Ridley's property responsibly and safely.
6. We remember that we are accountable for our actions and responsible for their consequences.

THE RIDLEY CODE OF CONDUCT

1. **We are all responsible for acting in accordance with occupational health and safety rules and policies at all times by:**
 - always applying and seeking to improve our working practices, as this helps prevent injuries, occupational illnesses and environmental incidents from occurring;
 - ensuring that all safety hazards, work-related accidents and injuries, including near-misses, are reported immediately;
 - making sure that all new employees and contractors are thoroughly briefed on health and safety procedures before entering operational areas;
 - not tolerating violent behaviour or threats of violent behaviour; and
 - not allowing employees or visitors to take illegal drugs or alcohol or behave recklessly whilst working on company sites.
2. **We treat each other with dignity and respect by:**
 - not allowing any discrimination, whether because of role, individual differences, age, sex, race (including colour, nationality, descent, ethnic or religious background), marital status, sexual orientation, or any perceived physical or intellectual impairment, to take place;
 - not tolerating harassment, intimidation or bullying;

- valuing our colleagues and their personal commitment to delivering quality products and services;
- encouraging cooperation and personal development in all who work with us; and
- understanding and responding to the needs of our customers and other stakeholders by promoting a culture of continuous improvement.

3. We respect the law and act accordingly by:

- understanding the laws, rules and regulations which relate to our own particular area of activity;
- complying with the laws, rules and regulations of the countries in which we operate, without compromising our Code principles;
- refusing to participate in, or condone in any way, dishonest, illegal or corrupt business practices;
- understanding that we each have an obligation to protect the company's assets and that anyone found to be defrauding the company may be dismissed and become the subject of criminal prosecution;
- respecting the customs, business practices and community expectations of the countries in which we operate; and
- complying with privacy laws, particularly in relation to the collection, use and handling of personal information.

4. We are honest and fair in our dealings and ensure that our behaviour is beyond reproach by:

- refusing to use coercive or misleading practices;
- never knowingly falsifying or wrongfully withholding information from colleagues or business associates, including information relating to the preparation of our financial statements;
- not placing ourselves in situations where our private interests could conflict directly or indirectly with our obligations to Ridley, if a conflict exists declaring it;
- not accepting or making gifts or favours which could be construed as being payments likely to influence business conduct;
- not acting in ways that may cause others to question either our commitment to Ridley, or the way in which Ridley does business;
- not dealing in securities (or encouraging others) whether Ridley securities or those of customers or suppliers when in possession of inside information; and

- reporting breaches of the Code.

5. We use Ridley's property responsibly and safely by:

- only using Ridley's property, such as equipment or stores, for company business, unless duly authorised;
- ensuring that we are properly trained for all the tasks we undertake, particularly those involving moveable equipment;
- complying with safety guidelines and wearing appropriate protective clothing whilst operating machinery;
- ensuring that confidential information and sensitive material is stored securely overnight or when unattended;
- taking reasonable and sensible precautions to ensure that company property is not stolen or mislaid; and
- being aware of the major risks e.g. fire at the premises where we work and following site procedures to mitigate that risk.

6. We are accountable for our actions and responsible for their consequences by:

- taking personal responsibility for all issues over which we have control and for the manner in which these are achieved;
- not disclosing any confidential information relating to any aspect of Ridley's business to third parties without prior authorisation; and
- protecting our customers by maintaining the quality of our products.

WE ARE ALL RESPONSIBLE

Each of us is responsible for ensuring our behaviour is consistent with the Code principles and, equally, we are responsible for reporting any breaches of the Code.

If you have suggestions to modify or improve the Code please discuss this with your supervisor.

If you have any doubts about an issue or situation you should seek advice from your supervisor or another colleague.

At the very least, you should ask yourself:

- *"Am I doing the right thing?", or*
- *"Would Ridley or I be embarrassed if my actions were to become public knowledge?".*

If you are still concerned about any issue regarding the Code, you should formally report it to your supervisor or manager. If you are uncomfortable about this, or unhappy with their response, you should then approach their line manager or a human resources representative.

If all these avenues fail, you should contact the external independent service provider, **Faircall**, who can be contacted on **1800 500 965**. If you contact **Faircall** your identity will only be disclosed to Ridley with your approval.

Note that Ridley will not take any action against any employee who reports a possible violation of the Code in good faith.

COMMUNICATION

The effective implementation, support and promotion of the Code is the responsibility of all Ridley managers, who must ensure that all employees, including new and temporary employees, are made aware of the Code and are provided with a copy upon commencement of their employment.

Employees are encouraged to raise issues concerning the Code with their supervisor, including suggestions to modify or extend the Code.

Copies of the Code are freely available throughout Ridley. The Code is also posted on the Ridley website. Your supervisor is available to help you understand the Code and clarify any concerns you may have about its application.

Please make sure that you are aware of the laws applying to your work. Assistance is available to clarify whether particular laws apply and how they may be interpreted. You should ask your supervisor to assist you in this, if you have any queries.