



Ridley Corporation Limited

Anti-bribery and Anti-corruption Policy

Ridley is a leading producer of high quality, high performance animal nutrition solutions. We recognise the role of our products in the food chain and are committed to complying with the laws and regulations of the countries in which we operate. We take great care and pride in the way we conduct our business and operate under a Code of Conduct with integrity, honesty and transparency.

This Anti-bribery and Anti-corruption Policy (**Policy**) sets out:

- the standards required of all Ridley employees to refrain from any activity that is, or could be alleged to be, corrupt - including in the nature of a bribe
- an authorisation and registration process for gifts and benefits

The Policy operates in conjunction with the Ridley Competition and Consumer Compliance Procedure which outlines the requirements to avoid any anti-competitive behaviour.

Scope

This Policy applies to the entire Ridley Corporation Limited consolidated group (**Ridley**).

If applicable laws in any jurisdiction in which Ridley operates are more stringent than the requirements of this Policy, those laws prevail. Conduct which infringes this Policy (or applicable laws) is likely to amount to criminal conduct both here in Australia and in other jurisdictions in which we operate. Engaging in such conduct will have very serious consequences both for Ridley and the individuals involved.

Policy

This Policy strictly and absolutely prohibits all forms of bribery, corruption and improper soliciting to government officials.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A "bribe" is an inducement or reward offered, accepted, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage that is not legitimately due.

Examples: A bribe can take many forms and the benefit offered can be monetary or non-monetary. For example, a bribe can take the form of gifts, political or charitable contributions, reciprocal favours, facilitation payments (unofficial payments to secure, expedite or facilitate routine government action), secret commissions, loans, forgiveness of loans, fees, rewards or other advantages.

Corruption is the abuse of entrusted power for private gain.

Improper soliciting or marketing to government officials of any jurisdiction is prohibited.

In the unlikely event a Ridley employee believes they are left with no alternative but to make payment(s) to preserve their physical safety, then the affected employee shall provide a factual report to the CEO within 48 hours of the event.

For the purposes of this Policy, third parties include any person we may deal with, including Government departments and officials, customers and suppliers, agents, contractors, brokers, distributors, facilitators, counsels, advisers, joint venture partners and business representatives.

Authorisation and Registration Process – Gifts and Benefits

Ridley expects integrity and transparency in all transactions.

Gifts and benefits provided or received in good faith for the establishment of appropriate business relationships are an important part of Ridley's business. Reasonable and proportionate gifts and benefits given and received in accordance with this Policy are permissible.

We must only give or receive gifts/benefits where they are:

- for a genuine purpose in the ordinary course of business
- proportionate and will not impact objectivity
- incidental to the establishment of appropriate business relationships
- not for an improper purpose including improper commercial advantage

All gifts and benefits must be authorised and registered as follows:

- obtain authorisation from your Manager for gifts/benefits *received or provided* worth \$150 or greater
- register all gifts/benefits *received or provided* worth \$50 or more in the Gift and Entertainment Register (cc your Manager)
- site donations made in accordance with the annually approved budgeted allowances must be pre-authorised by Managers and recorded in the Gift and Entertainment Register
- travel, accommodation and conference registrations from a Third Party must be pre-authorised by the relevant member of the Lead Team, or if a Lead Team member is the recipient or provider, the CEO and Managing Director and recorded in the Gift and Entertainment Register
- any proposed participation in, or gifts proposed to be given in conjunction with, any political activities require prior formal approval by the Ridley Board

To record a gift/benefit on the Gift and Entertainment Register email melbourneoffice@ridley.com.au (cc your Manager).

Gifts and/or benefits must be declared within five (5) working days.

This Policy in Action

To report a breach or suspected breach of this Policy, the following avenues are available:

1. Report to immediate Supervisor, Manager, to HR or any member of the Lead Team.
2. Access to **Stopline** (an independent, confidential service that is available to anyone):



Telephone (Australia):	1300 304 550
Telephone (Overseas):	02 5500 7307
Online:	https://ridley.stoplinereport.com
Email:	ridley@stopline.com.au
Mail:	Ridley c/o Stopline, PO Box 403, Diamond Creek VIC 3089 Australia

VERSION CONTROL

Approved by the Board:	23 November 2022
Management Review:	Annual