

Code of Conduct

Effective date	1 September 2016
Policy owner	Group People & Performance
Applies to	All GWF employees, contractors, customers and visitors, Australia & New Zealand
Contact Officer	Your Functional/Divisional People & Performance Partner

This signed statement confirms our commitment to making GWF workplaces professional and ethical for ALL and is to be displayed at all work locations.

Purpose and Aims

George Weston Foods Limited, George Weston Foods (NZ) Limited and their related companies (**GWF, we, our, us**) are committed to achieving the highest standards of ethical conduct in all aspects of our business. All GWF employees, officers and directors must display exemplary standards in relation to professional business conduct as well as complying with the law. High standards of conduct will serve to enhance our reputation for fair and responsible trading, as a good employer, and encourage appropriate behaviour across the business. We believe that these behaviours build trust between our people and clients, enhance our reputation and ensure our continued prosperity.

This Code of Conduct (**Code**) articulates the principles which guide the conduct of the GWF business and reflect our commitment to integrity and honesty, legal compliance, the community and environment, fair dealing, accountability, open communication and diversity in our workplaces. If you work at GWF in any capacity, including employees, potential employees and contractors, whether on a full-time, part-time or casual basis, on or off-site, or if you are a customer or visitor attending our workplace or an event we have organised (**you, person, people**), then this Code applies to you and you must familiarise yourself with, and comply with, this Code and any variations to this Code. Please note specifying anything after the word including does not limit what else is included.

This Code is a GWF policy and may be reviewed, varied, added to or withdrawn by GWF at any time, at our absolute discretion. This Code, and any amendments to it, does not form part of your employment contract or agreement or any independent contractor agreement (as the case may be).

Openness

GWF will make this Code available through the People Portal or displayed at site in accordance with applicable industrial agreements.

Be Ethical and Honest

All of our affairs must be conducted and seen to be conducted in an ethical and honest manner. This means that our people are expected to act with honesty and integrity in all GWF business dealings. Lack of integrity and honesty impacts morale of our people, damages our reputation and may constitute a criminal offence.

Our people are expected to take reasonable care to meet business commitments which are made, to follow standard business practices, to respect others, to adhere fully to their own values and GWF values in the performance of work and to be accurate and truthful in dealings with third parties. Unethical and dishonest behaviour may be regarded as serious misconduct and may result in dismissal.

Comply with all Laws and GWF Policies

Our people must comply strictly with:

- all laws, licences, rules and regulations which apply to the conduct of our business across all jurisdictions, including competition laws;
- all GWF policies, including this Code, the **Workplace Behaviour Policy**, **Health & Safety Policy**, People & Performance, Group, Finance and Management policies; and
- all relevant policies of our parent company, Associated British Foods (**ABF**), including the **Red Book** and **ABF Anti-Bribery Policy**.

It is the responsibility of all our people to ensure to that they have sufficient knowledge about the laws, licences, rules and regulations which affect the performance of their duties for and operation of the business at GWF and that they are familiar with and comply with all GWF policies as well as relevant policies of ABF.

Advice may be sought from managers, People & Performance specialists, Group Legal or other appropriate personnel as required, and copies of all policies which apply to our people are available on the People Portal or with the site People & Performance Manager. Failure to comply with laws and/or policies may result in disciplinary action. Please refer to the People Portal or your People & Performance Partner for a listing of GWF policies and ABF policies which our people and contractors are required to be familiar with and comply with in working for us.

Be a Good Corporate Citizen

GWF is committed to being a good corporate citizen. We strive to achieve the high standards expected of companies in the countries in which we operate. Every person is encouraged to become involved in GWF charity work and to be involved in the community. GWF has a commitment to the protection of the environment and our people are called to challenge practices that they believe may be environmentally irresponsible.

Avoid Conflicts of Interest

Our people must not place themselves in a position which may lead to a conflict, or perceived conflict of interest, between their personal interests and those of our business. A conflict of interest exists if a person is involved in other employment, businesses or external activities that interfere with, or impact on, their ability to satisfactorily perform their duties for GWF. All our people should ensure that their activities do not conflict with or reflect adversely on our interests, deprive us of legitimate work time, or compete with our businesses.

All persons must notify GWF of any commitment to another employer, business or external activity which may lead to a conflict, or results in a conflict. A serious conflict of interest which cannot be satisfactorily resolved may result in termination of employment.

Refuse Improper Gifts and Hospitality

GWF recognises that there may be situations in which it may be appropriate to accept modest gifts or business hospitality out of courtesy and to build relationships with our clients and business associates. However, GWF is committed to fair and honest conduct of business and our people must refuse, and must not provide to any other party, any gifts or hospitality which would be inconsistent with standard business practices, be construed as improper or corrupt, or violate any law, regulation, rule, GWF or ABF policy. Our people should all refer to, familiarise themselves with, and comply with the **Anti-Bribery & Corruption Policy**, which provides further detail on this issue.

Use GWF Resources and Property Responsibly

Our people are to use and operate GWF resources and property in a proper and efficient manner and are to protect GWF resources and property from loss, damage, misuse, theft, embezzlement and inappropriate destruction at all times.

Our people are not permitted to use any GWF resources or property, including computer equipment, telephones, facsimiles and the email system for any non-GWF activity (other than an incidental and minor personal purpose) whether in or outside of work time, unless prior approval for the use of that resource or property has been given by that person's line manager.

An incidental and minor personal purpose is a personal purpose which does not:

- substantially impact on the person's performance of their duties to GWF;
- give rise to personal gain to the person; or
- constitute a use that would otherwise violate other GWF policies including those in respect of employee time, commitments to work and use of equipment.

Keep GWF's Information Confidential

All information pertaining to GWF may only be used in the performance of duties to GWF and it is prudent to assume that all such information is confidential (including information about GWF's business and financial affairs, employees, intellectual property, its competitors, customers, employees, products and services). The improper handling of confidential information may constitute a breach of law or a GWF policy.

Respect the Privacy of Individuals

GWF respects the privacy of individuals whose personal information it holds, and complies with the National Privacy Principles. It is essential that all persons who handle personal information are familiar with and comply with the **General Privacy Policy** and **People Privacy Policy**, and privacy procedures as relevant to their duties.

Cultivate Safe, Healthy and Diverse Workplaces

GWF is committed to providing our people with equal access to opportunities and, as far as reasonably practicable, healthy and safe workplaces. Our people should be familiar with and comply with GWF's policies, including the **Workplace Behaviour Policy** and the **Health & Safety Policy**. A measure of our success in this area is that GWF businesses look to be as diverse and representative of the communities in which they operate.

Your Responsibility to Report Breaches of this Code of Conduct

If you believe there is an actual or suspected breach of this Code occurring, it is your obligation to bring it to the attention of one of those listed below. All reports will be treated seriously and confidentially within the Group, except to the extent GWF may have to disclose information to a regulatory body, as required by law or to allow for a proper investigation or disciplinary process. You will not be victimised or treated unfairly for making a complaint provided it is made in good faith. However, complaints that are vexatious or malicious may result in disciplinary action against the complainant.

Ways to Raise a Concern

- **Tell your line manager/head of department/People & Performance Partner** There is no special procedure for doing this – you can tell him/her about the problem or put it in writing if you prefer.
- Email or call Michelle Pombart, Group People & Performance Director on +61 414210019 or michelle.pombart@gwf.com.au

- Email or call Andrew Cullen, Group General Counsel on +61 4414862845 or Andrew.Cullen@gwf.com.au
- **Tell the Ethics Committee** Send the details of your concern to ethics@gwf.com.au who will refer your query to a member of the committee.
- **Raise it via “Expolink” - our independent Ethics Hotline** We have an arrangement with an independent external party “Expolink” where you can express your concerns anonymously. If you feel you are unable to raise the matter internally, for whatever reason, you should use this service. Your details will only be provided to GWF if you agree. You can either:
 - call Expolink on 1800 121 889 (Freecall **Australia**), 0800 443 816 (Freecall **New Zealand**),
 - email Expolink at gwf@expolink.co.uk, or
 - logon to www.expolink.co.uk/gwf and enter your concern onlineeach anonymously. All matters, including those raised anonymously, will be reported to GWF’s Ethics Committee to consider and, where appropriate, investigate.
- **Notify the Company Secretary of our Parent Company, Associated British Foods plc** If you have reasonable grounds for believing that the CEO or Directors of GWF may be involved or condoning behaviour in breach of this Policy you should report it to the Company Secretary of ABF – contact Rosalyn Schofield on + 44 20 7299 3641 or rosalyn.schofield@abfoods.com.

Consequences of breaching this Code of Conduct

We retain discretion to commence disciplinary action for breaches of this Code. Disciplinary action may include a written warning, counselling, suspension or the termination of a person’s employment or engagement. We may also refer a breach of this Code to law enforcement authorities where necessary.

Related documents

- ABF Red Book
- General Privacy Policy
- People Privacy Policy (AUS)
- People Privacy Policy (NZ)
- Health & Safety Policy
- Workplace Behaviour Policy
- Anti-Bribery & Corruption Policy
- Responsible Sourcing Code of Conduct

Statement from Chief Executive

I am fully committed to the implementation of this Policy and the motivation of all our people to achieve its objectives.



Stuart Grainger

GWF Chief Executive