

## CODE OF CONDUCT

DOCUMENT ID	HR-P-0001
Related Documents	Performance Management Policy Grievance Handling Policy and Procedure Disciplinary Policy Privacy Policy Work Health & Safety Policy Whistleblower Protection Policy
Date	5 August 2021
Date of Next Review	30 June 2022
Approved By	Board/Directors
Version	3
Responsible Officer	HR Manager
References and Legislation	Fair Work Act 2009 All State and Federal Legislation relating to Employment, Discrimination, Workplace Safety, & Privacy. Australian Consumer and Competition legislation

### 1. **POLICY**

The purpose of the Code of Conduct is to define the expected behavior of all employees when carrying out the business of Steinhardt Group Pty Ltd, Steinhardt Corporation Pty Ltd as trustee for Steinhardt Family Trust (trading as Macadamias Australia), and Farmfresh Beneficial Holdings Pty Ltd as trustee for the Farmfresh Fine Foods Unit Trust (trading as Farmfresh Fine Foods), hereafter referred to as the 'Steinhardt Group'.

This means how we behave towards our colleagues, managers, owners, and those that we do business with such as customers, suppliers, and business partners.

Steinhardt Group embrace diversity of thought, freedom of expression and open communication is encouraged. In doing this it is expected that all employees contribute respectfully and in adherence to the Code of Conduct to create a collaborative working environment that benefits everyone.

### 2. **SCOPE**

The Code of Conduct applies to all employees at Steinhardt Group, regardless of position, tenure, or seniority. Employees are bound by their contracts of employment to comply with all elements of the Code of Conduct as set out below.

### 3. **VALUES**

It is a requirement of employment at Steinhardt Group, that employees behave in a manner that is consistent with our values. At Steinhardt Group we care about:

#### PEOPLE



We aim to enhance the lives and wellbeing of our employees and their families; the community where we live and work; our suppliers and business partners; and the consumers of our products.

#### INNOVATION



Our innovations will continually improve our work practices and results, and influence industry work practices and standards.

## QUALITY

Our focus on quality extends beyond our own systems and processes to our suppliers and business partners to ensure the quality, safety, and consistency of our products.

## INTEGRITY

We will always act with integrity; be honest; choose to do the right thing; to work sustainably and with the future of our people, our environment, and our community in mind.

### **4. COMPLYING WITH THE LAW**

It is essential that we operate our business to be legally compliant with all relevant legislation. All employees must comply with laws that affect their employment activities including and not limited to discrimination, safety, workplace, privacy, business, and environment laws.

Employees are trusted to act legally, ethically, and responsibly when dealing with the Company's finances, products, partnerships, and public image. Any breach of the law will be treated as serious and may result in the termination of employment.

### **5. RESPECT IN THE WORKPLACE**

Every person brings a different perspective to the workplace which is valued. All employees must respect each other's differences and contributions. Any form of disrespect, discriminatory behaviour, harassment, bullying or victimization will not be tolerated and will be addressed immediately.

Employees are encouraged to seek assistance if they need it to address issues and resolve grievances in a respectful and timely manner.

### **6. EMPLOYEE BEHAVIOUR**

As an employee of Steinhardt Group, you are expected to behave in a way that ensures the safety and wellbeing of yourself and others. At work and as a representative of Steinhardt Group you are required to

- Use your best efforts to do a good job and devote your time at work, to work activities and achieving the required results;
- Ask when you need help or when things are not working as planned;
- Follow all reasonable instructions from supervisors and managers, comply with work procedures and standards, and applicable laws;
- Manage all company assets under your control to ensure they are protected from theft or damage and used for the purpose they were intended and not for private or other purposes. Including physical assets, financial assets, confidential information, and intellectual property.
- Uphold the reputation of Steinhardt Group through your work activities and participation as a member of the community

Behaviour that is inappropriate and may require investigation, corrective action, or a disciplinary procedure up to and including the termination of employment includes, but is not limited to:

- Working unsafely or in a manner that creates an unsafe work environment
- Working under the influence of alcohol or drugs; including prescription or over the counter drugs
- Not taking responsibility for your work activities, results and workplace responsibilities and substandard work performance.

- Breaching company policies and/or not following procedures
- Unauthorised absences from work, including late arrival, early departures, and excessive breaks.
- Stealing or damaging company or private property or material and/or misappropriation of company funds or other assets.
- Assault, threatening, intimidating, coercing, fighting, injuring, using offensive language or interfering with other employees.
- Any form of harassment (including sexual harassment), bullying, discrimination, victimisation or vilification.
- Being under the influence of alcohol or illegal drugs during any work activities.
- Horseplay, skylarking or gross carelessness
- Tampering with product
- Any other act which can reasonably be construed to be detrimental to the legitimate business interests of Steinhardt Group or obtrusive to the normal operation of the business.

## **7. DRUGS AND ALCOHOL**

Alcohol and drugs, including prescription and over the counter drugs, can impede working ability and is a serious risk to the safety of the employee and others. Working whilst under the influence of alcohol or drugs is totally forbidden. It is considered serious misconduct and can result in instant dismissal, as provided for under Work Health and Safety legislation.

A person who uses prescription or “over the counter” drugs whilst at work which have known side effects detrimental to work capacity and/or safety, e.g. drowsiness, must inform their supervisor of this use prior to commencing work.

## **8. GROOMING**

**Employees must dress appropriately for their position, in compliance with safety standards and as required to represent Steinhardt Group. This includes:**

- Clothing and footwear must be clean, in good repair and offer the required protection for the employee’s position (eg: hats, shirts, & sun protection required for outside work; sturdy, enclosed footwear).
- Items of clothing must not present a safety risk.
- Personal Protective Equipment must be worn where directed.

Information on Personal Protective Equipment (PPE) and uniform requirements for your respective areas can be located in the Uniform Policies. The Uniform Policies are found on Subscribe HR or a hard copy in staff designated break areas.

## **9. ACCOUNTABILITY**

All employees are accountable for their actions and behaviour. Employees are also accountable for carrying out the duties and responsibilities of their roles to an acceptable standard.

## **10. COMPANY POLICIES, PROCEDURES AND SYSTEMS**

A range of policies, procedures and systems govern our workplace processes and employment terms and conditions of employment. Employees of Steinhardt Group are required to comply with all such policies, procedures, and systems at all times. In addition to workplace policies and procedures, this includes standard operating procedures and systems of work such as Quality Systems, HACCP Systems, Production Systems and Safety Systems.

## **11. CONTRIBUTION TO THE ENVIRONMENT AND SOCIETY**

Steinhardt Group aims to minimise any negative impact on the environment and positively contribute to ongoing environmental sustainability. This is achieved by ensuring the safe and

efficient use of all energy and resources used to conduct business operations, and ensuring all industrial waste is properly disposed of.

## **12. BREACHING THE CODE OF CONDUCT**

An employee may be subject to disciplinary action if they fail to follow the Code of Conduct. The form of disciplinary action will be determined by the company and will depend on a number of factors, including the extent and nature of the breach. Such disciplinary action could include the termination of the employee's employment. When employee conduct also conflicts with the law or with other regulations, the employee may also be subject to criminal or civil penalties.

## **13. REPORTING A BREACH OF THE CODE OF CONDUCT**

Employees are required to report any behaviour or incidents that breach or are suspected to breach the Code of Conduct to allow Steinhardt Group the opportunity to investigate, rectify or prevent potential misconducts and the impact of these actions.

If an employee becomes aware of any violation or potential violation of the Code of Conduct, they must immediately notify the HR Manager or report it to their immediate supervisor or manager; or an alternative manager. Any person to whom a violation is reported is required to inform the HR Manager.

Reporting an incident, potential breach or breach of the Code of Conduct can be made either in person, by phone or email. Employees who are aware of a breach of the Code of Conduct and who fail to report it or deliberately conceal information regarding this, irrespective of their involvement, could also face disciplinary action.

To the extent that it is able to, the company will respect the privacy of employees including names of those involved and protect the reporting person from receiving detrimental treatment as a result of their decision to inform their supervisor. Persons reporting in bad faith, may be subject to disciplinary action.

All reported incidents will be investigated confidentially to determine appropriate corrective, preventative, or disciplinary measures. Relevant company policies and procedures will apply to all investigations and actions.

The HR Manager is the contact for all Code of Conduct matters. Any issue that is identified as a breach of Code of Conduct and reported by an employee through any of the channels listed above will be investigated and managed by the HR Manager. Serious matters will be escalated to the Family Council and the Board.

## **14. DOCUMENT CHANGE CONTROL AND APPROVAL**

<b>Approval and Amendment History</b>	<b>Versions</b>	<b>Description</b>	<b>Name and Signature of Approval</b>
Board of Directors (October 2018)	V1	New policy drafted for Macadamias Australia	Janelle Gerry – Director
HR Manager Board – 9 September 2019	V1.1 – V2	Changes made see Document Control Management Register in HR 'I' Drive in Steinhardt Group Policy Folder	Directors 3 June 2021
HR Manager Board – 5 August 2021	V3	This document supersedes any other Code of Conduct for Steinhardt Group	Board