

# **T&G Code of Ethics**

Our Code of Ethics is a guide of principles designed to help our people conduct T&G business honestly and with integrity.

Ethical and legal behaviour is the responsibility of every individual. We treat everyone fairly, respectfully and with integrity. We treat our colleagues, our business partners and customers how we would like to be treated.

The Code of Ethics applies to all employees of T&G Global Limited (the Company) and all of its majority-owned subsidiaries (together T&G). We ask all employees to familiarise themselves with the T&G Code of Ethics as any breach may result in disciplinary action, up to and including dismissal.

#### **Good Practice**

#### **Diversity**

T&G is committed to a culture that promotes and values diversity and inclusiveness.

#### Sustainability

T&G's is committed to the land on which we grow so doing right by it, environmentally and socially, is essential. It leads to healthier, more natural produce, and aids the health and development of our growers' communities around the globe.

To ensure we are sustainable and responsible, we've put in place some important policies, measurements and standards to live up to everyday around biodiversity, energy usage, reducing waste and being smarter with how we source, use, recycle and reuse materials and packaging.

# Making best practice even better

Externally, we work with independent experts such as Global Reporting Initiative (GRI) who have set us high benchmarks, guidelines and a framework like that adopted by OECD, the UN Environment Programme, UN Trade & Development and many others.

From environmental issues like energy, emissions, waste, water, biodiversity and transport to social initiatives like health, safety, community and diversity – achieving best practice is a big part of who we are and how we exist.

### Community

We encourage everyone to enjoy 'healthy eating, active living' or H.E.A.L. Through our H.E.A.L programme, we supply fresh produce for community and corporate events and support sporting activities with a link to healthy eating.

### **General Conduct Requirements**

#### **Assets and resources**

T&G's assets are valuable resources that should be used for business purposes. Employees should care for and use T&G's assets responsibly and protect them from theft, misuse and destruction.

# **Human rights**

We respect the global regulations on the protection of human rights as fundamental and universal rules and do not accept forced or child labour.

# **Health & Safety**

T&G is committed to providing a healthy and safe working environment and ensuring that all our workers who come to work go home healthy and safe.

Owner: Company Secretary Issue Date: Dec 2017 FRIC Review Date: Dec 2019

### **Lawful Conduct**

#### Compliance with all applicable laws and internal regulations

T&G competes vigorously in the marketplace, and we're committed to doing so in a manner that is fair, honest, ethical and legal. We respect, observe and comply with all locally applicable rules and laws in New Zealand and all other countries in which T&G operates. Violations of applicable laws are not tolerated and will be treated accordingly.

# Compliance with competition law and antitrust rules

T&G is committed to open markets and fair competition, and is prohibited from exchanging information about prices, market shares, capacities, investments, strategies, tendering procedures or similar with competitors. All T&G employees, including Directors, are obliged to comply with antitrust rules.

# Compliance with anti-corruption laws

We do not accept any form of bribery nor do we offer or accept illicit benefits from business partners. Further, the mere appearance of such behaviour should always be avoided.

# Anti-money laundering, foreign trade and tax law

In our international activities and the development of new markets, we respect the various legal provisions on foreign trade, customs and tax law that apply to us. We comply with all regulations to combat money laundering.

#### Speak up policy

We encourage and support all employees to speak up in confidence and report any matters that they suspect may involve anything improper, unethical or inappropriate.

## **Confidentiality and Data Protection**

## Data protection and privacy

T&G treats its confidential business information, operational data and the personal information of its employees as a highly sensitive asset that must be carefully protected. We ensure this confidential information does not reach third parties or the public, and we do not use this information for personal gain.

# **Obligation of discretion**

We treat all business and operational information and the activities of our business partners confidentially.

### Compliance with legislation on capital markets

We treat insider information obtained during our day-to-day operation as confidential, comply with applicable legislation and refrain from trading stock in critical phases before annual reporting. We inform the NZX of all Material Information in accordance with the NZX Listing Rules.

#### **Conflict of interest**

We ensure that we maintain an objective view and our personal interests do not conflict with the interests of T&G.

### Reporting

All of T&G's financial reporting is correct, complete and understandable. This applies to reporting on business performances and all information about the current financial performance and cash flows. We create and communicate our reports on time and in accordance with national and international accounting regulations.

### Intellectual property

T&G retains the intellectual property rights and interests (including common law rights and interests for any work that is produced for T&G during the term of an employee's employment).

If you have any questions about this Code of Ethics we ask that you talk to your manager or a member from the HR team.

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