

Policy	T&G Code of Ethics
<p>Purpose</p>	<p>Our Code of Ethics is a guide of principles designed to help our people conduct T&G business honestly and with integrity.</p> <p>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.</p>
<p>Scope</p>	<p>The Code of Ethics applies to all Directors, Executives and other employees of T&G Global Limited (the Company) and all of its majority-owned / controlled subsidiaries (together T&G). We ask all employees to familiarise themselves with the T&G Code of Ethics as any employees who are proven to have breached this Code of Ethics will face in disciplinary action which, depending on the seriousness and severity of the breach, could include dismissal or legal action or both.</p>
<p>Key Principles</p>	<p>Good Practice</p> <p><u>Diversity</u> T&G is committed to a culture that promotes and values diversity and inclusiveness.</p> <p><u>Sustainability</u> T&G 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.</p> <p>We use the Global Reporting Initiative (GRI) to shape our sustainability strategy and have set ourselves commitments and goals like that adopted by OECD, the UN Environment Programme, UN Trade & Development and many others.</p> <p>To ensure we are sustainable and responsible, we are actively working to <i>do more, using less</i> by increasing our energy efficiency, minimising our waste to landfill, growing smarter with a lower input of resources, protecting and restoring our habitats and improving how we source, use, recycle and reuse materials and packaging. For all of our sustainability aspects, including energy, emissions, waste, water, biodiversity, health, safety, community and diversity – achieving best practice is a big part of who we are and how we exist.</p> <p><u>Community</u> 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.</p> <p>General Conduct Requirements</p> <p><u>Assets and Resources</u> 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.</p> <p><u>Human rights</u> We respect the global regulations on the protection of human rights as fundamental and universal rules and do not accept forced or child labour.</p> <p><u>Health & Safety</u> 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.</p> <p>Lawful Conduct</p> <p><u>Compliance with all applicable laws and internal regulations</u> 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</p>

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).

Reporting Procedures

It is the responsibility of all employees to comply with the Code of Ethics and to report violations or suspected violations immediately. If any employee reasonably believes that some policy, practice or action of T&G or any of its employees is in violation of the Code of Ethics, they should report the violation as follows:

- If you reasonably believe a Code of Ethics violation has been committed, you should raise the issue in writing with your manager.

	<ul style="list-style-type: none"> If, for any reason, you are not able to do this then you should escalate the issue to your manager's manager or contact the Director of People & Culture to report your concern. <p>Any reports of suspected breaches of the Code of Ethics will be handled confidentially, and the identity of the person making the report will be kept confidential where possible. However, there may be situations where the proper investigation of the matter inadvertently identifies the reporter or requires their identification.</p> <p>No T&G employees who report a suspected breach of the Code of Ethics in good faith should be concerned about retaliation by anyone at T&G. Any T&G employee or other person involved in retaliation will be subject to sanctions that may include serious disciplinary action, removal from office or dismissal as well as other remedies, all to the extent permitted by law and as appropriate given the specific circumstances.</p> <p>T&G requires all employees who receive a report of an actual or suspected breach of this Code of Ethics to take all reasonable steps within their control to ensure that:</p> <ul style="list-style-type: none"> The behaviour alleged in this report is thoroughly and fairly investigated Appropriate disciplinary action is taken if the allegation is substantiated. <p>Any person who knowingly makes a false report of a policy breach may be subject to disciplinary action.</p>
Authorities	Board of Directors: Review and approval of the Code of Ethics; Director People and Culture: Review and approval of minor changes of the Code of Ethics.
Approval	The code of ethics was approved by the Board on 15 December 2017 with minor changes approved by the Director of People and Culture on 6 November 2019.
Further Information	If you have any questions about this Code of Ethics please talk to your manager or a member from the People & Culture team.

Policy Updates

Date	Name	Update Made
6/11/2019	Megan Powers	Reporting procedures added