



T&G Code of Ethics

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

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

Scope

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).

Key Aspirations

Kaitiakitanga is integral to how we do business. For T&G, this means we treat the land, people, produce, resources and community with the greatest of respect and care, as guardians of their future. To guide us in what we do and how we do it, our Kaitiakitanga framework has three key pillars: Our People, Our Place, Our Produce; underpinned by the following eight key aspirations.

Protect and Grow

T&G is committed to providing a healthy and safe working environment and ensuring everyone goes home safely every day, and that our people have the tools and knowledge to improve their own and their colleagues' health, safety and wellbeing.

Fairness in our Workplace

T&G is committed to a culture that promotes and values inclusion and diversity in our workplace, which is reflected in our [Diversity and Inclusion Policy](#).

Climate Action

T&G is committed to making a difference on climate change, reducing our emissions, harnessing clean energy and adapting with innovative solutions.

Closing the Loop

T&G supports a closed loop system, retaining and generating value from produce and materials. We actively refuse waste by using resources efficiently, seeking renewable materials, minimising food loss and considering end of life.

Lower Impact, Smarter Growing

We invest in innovation and genetics to increase our growing efficiency and continue to improve the health of our land and ecosystem.

Safe Food

We are building a world-class, transparent supply chain, committed to the highest standards of food safety, quality and assurance.

Responsible Partnership

Through shared social, environmental and economical objectives, we are building strong and sustainable partnerships with our growers, customers, suppliers and communities.

Healthy Communities

We build thriving communities by promoting healthy nutrition and helping address food insecurity.

General and Lawful Conduct

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.

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. Also refer to the [Anti-Bribery and Corruption Policy](#) and the [Gifts and Hospitality Policy](#).

Anti-money laundering, foreign trade and tax laws

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.

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 in compliance to applicable privacy legislation. We ensure this confidential information is carefully protected, 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 New Zealand Stock Exchange (NZX) of all Material Information in accordance with the NZX Listing Rules as described in the [Continuous Disclosure Policy](#). How to buy and sell shares in T&G Global Limited is outlined in the [Share Trade Policy](#) and must not be based on the possession of Material Information.

Conflict of Interest

We ensure that we maintain an objective view and our personal interests do not conflict with the interests of T&G. Also refer to the [Conflict of Interest Policy](#).

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 any matters that they suspect may involve anything improper, unethical or inappropriate

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.
- If, for any reason, you are not able to do this then you should escalate the issue to your manager's manager, contact your HR Business Partner or utilize the T&G [Speak Up](#) system to report your concern.

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.

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.

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:

- The behaviour alleged in this report is thoroughly and fairly investigated
- Appropriate disciplinary action is taken if the allegation is substantiated.

Any person who knowingly makes a false report of a policy breach may be subject to disciplinary action.

Authorities

- T&G Board of Directors: Authority to approve major changes to this Policy;
- Director People and Culture: Authority to approve minor changes to this Policy.

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 and 6 January 2021.

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
23/11/2020	Bianca Verbeek	Links to policies added
06/01/2021	Bianca Verbeek	Key Aspirations added