

BUSINESS ETHICS CODE



INTRODUCTION

Ethical Behaviour

Ethical behaviour is conduct that is beyond reproach and in accordance to laid down standards of a society, or organisation.

Fundamentally, ethics is about choices that people make about ordinary (as well as extraordinary) decisions in day-to-day life.

Choices are often impacted by personal and professional values. Many leaders use their personal lives as a moral compass for their professional conduct. While values are nonnegotiable, practices may need to be adapted to the situation at hand, or from time to time. Aligning actions with values will ensure that they are being incorporated into the operations of the organisation from the highest to the lowest level, ensuring overall success.

Our Business Ethics Code

1. Compliance with Laws and Regulations

Our company is committed to fully complying with all applicable laws, regulations, and standards governing the edible oil refining and manufacturing industry in Australia. We will conduct our business operations in an ethical and lawful manner at all times.

2. Transparency and Integrity

We will maintain transparency and integrity in our business practices. All financial records, transactions, and reporting will be accurate and transparent, adhering to accounting principles and standards. Bribery, corruption, and any form of unethical conduct will not be tolerated.

3. Bribery and Corruption

Bribery is the act of offering, promising, giving, requesting or accepting a benefit with the intention of influencing a person to do, or not do, something which would provide you or Peerless with a business advantage that is not legitimately due.

We have zero appetite towards Bribery, Corruption and Facilitation Payments.

Employees, and Third Parties acting for or on behalf of Peerless are prohibited from:

- engaging in any kind of Bribe, Facilitation Payment, or corrupt behaviour, regardless of whether or not a benefit is given to or received by another person, including Public Officials, and regardless of the value of the benefit;
- carrying out any dishonest accounting or concealment of complete and accurate financial activity;
- making political donations in the form of cash/money on behalf of the Group;

Bribes are anything of value. They can be in the form of money, but they may also be non-monetary. Examples include:

- discounts;
- gifts;
- positions of employment or contracts for services;

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- use of materials, facilities or equipment;
- entertainment,
- political or charitable contributions;
- loans;
- gift cards;
- favours; and
- secret commissions.

As Peerless employee you should not offer, promise, pay, request, or accept a bribe of any kind, in any form.

4. Sustainability and Environmental Responsibility

We are dedicated to minimizing our environmental impact and promoting sustainability in our operations. We will adopt practices that reduce waste, conserve energy, and protect natural resources. Our manufacturing processes will comply with environmental regulations and promote the responsible use and disposal of materials.

5. Product Quality and Safety

We prioritize the quality and safety of our edible oil products. We will adhere to industry standards and regulations to ensure that our products meet the highest quality specifications and pose no harm to consumers. Our refining processes will be carried out in compliance with relevant quality control and safety protocols.

6. Health and Safety of Employees

We are committed to providing a safe and healthy work environment for our employees. We will implement and maintain occupational health and safety measures, as required by law, to prevent accidents, injuries, and occupational illnesses. Training programs and regular safety audits will be conducted to ensure compliance.

7. Ethical Sourcing and Supply Chain Responsibility

We will engage in responsible sourcing of raw materials for our edible oil refining and manufacturing processes. We will work with suppliers who adhere to ethical business practices, respect human rights, and follow environmental sustainability standards. Transparent and respectful relationships will be maintained with our suppliers and business partners.

8. Fair Employment Practices

We are dedicated to fair and inclusive employment practices. We will provide equal opportunities for employment and advancement to all employees, irrespective of their race, gender, religion, age, disability, or any other protected characteristic. We will ensure fair compensation, benefits, and working conditions, and prohibit any form of discrimination or harassment.

9. Data Privacy and Confidentiality

We recognize the importance of protecting the privacy and confidentiality of our customers, employees, and any other individuals whose information we handle. We will handle personal data securely and in compliance with applicable data protection laws, ensuring that personal information is collected, used, and stored only for legitimate business purposes.

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10. Community Engagement and Social Responsibility

We will actively engage with the local community in which we operate, supporting initiatives that contribute to social development, education, healthcare, and environmental conservation. We will participate in philanthropic activities and promote volunteerism among our employees.

11. Reporting Ethical Concerns

We encourage employees to report any ethical concerns or potential violations of this code. A confidential reporting mechanism will be established to protect whistleblowers from retaliation. All reported concerns will be promptly and thoroughly investigated, followed by appropriate actions.

12. Periodic Review and Improvement

This Business Ethics Code will be reviewed periodically, and necessary revisions will be made to ensure its continued relevance and effectiveness. We will monitor evolving legal and industry standards to align our practices with the highest ethical standards.

By adopting and adhering to this Business Ethics Code, we aim to build a responsible, sustainable, and ethical edible oil refining and manufacturing business in Australia.

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