



MLA code of business conduct and ethics

Message from MLA's Chairman Don Heatley and Managing Director David Palmer

MLA has operated successfully since 1998. The company continues to succeed because MLA has earned a solid reputation for integrity, which we are committed to maintaining. MLA carries on business honestly and fairly, acting only in ways that reflect well on the company in compliance with all laws and regulations.

MLA expects all its Directors, employees and other persons that act on behalf of the company to conduct themselves in accordance with MLA's values, commitments and its code of business conduct and ethics.

Values

MLA's values describe behaviours that the Company expects employees to demonstrate in their actions and decisions they make in pursuing the outcomes they are committed to achieving.

Our values are:

- Collaborate with stakeholders
- Seek excellence
- Deliver value
- Work as a team and meet deadlines
- Act with integrity
- Never forget where the money comes from

Commitments

MLA's commitments define the relationship that we strive to achieve with our key stakeholders.

Our Commitments include:

Our employees: MLA is committed to providing a work environment that is safe, free from harassment, prejudice and favouritism, where personal development is encouraged, equal opportunity is fostered, team work is valued, in which people want to perform and good performance is recognised and rewarded.

Our members and industry stakeholders: MLA is committed to providing value to the red meat industry by carrying on business in a sound and effective way and clearly, openly, accurately and honestly reporting on the company's operations to our members.

Our customers: MLA is committed to conducting business honestly, with integrity and providing our customers – including the customers of the red meat industry – with high quality products consistent with their expectations. We recognise we are in long term partnership with our customers for mutual benefit.

Our suppliers: We are committed to open and honest dealing with our suppliers, recognising their contributions in providing best value for MLA's stakeholders.

Our communities: MLA is committed to earning and maintaining the support of the communities which provide our license to operate, including Peak Councils, Government and the community at large.

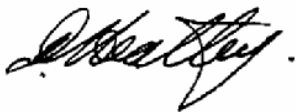
Code of Business Conduct and Ethics - Purpose

MLA's *Code of Business Conduct and Ethics*, which has the full endorsement of the MLA's Board of Directors, embodies MLA's values and provides clear guidelines to ensure MLA's commitments to its key stakeholders are met.

The standards set out in this Code cannot anticipate every situation which may pose a legal, ethical or moral question. Managers and employees are expected to exercise sound judgement when evaluating an issue of business conduct. If they are in doubt, they should seek advice from their manager, MLA Legal or Human Resources prior to taking any action which may compromise themselves or the Company.

By following the MLA's *Code of Business Conduct and Ethics*, MLA's people will ensure that our reputation for high ethical standards is protected.

Yours faithfully



Don Heatley

Chairman

Meat & Livestock Australia



David Palmer

Managing Director

Meat & Livestock Australia

CODE OF BUSINESS CONDUCT AND ETHICS

OUR RESPONSIBILITIES

All of MLA's people, including the Directors, management, employees and contractors are expected to have a commitment to the standards in this code. The standards go beyond compliance with laws and regulations and embrace MLA's values and commitments to its stakeholders.

1) Openness, Integrity and Fairness

MLA's people will conduct themselves with openness, integrity and will deal fairly with others, including other employees, members and industry stakeholders, customers, suppliers and our communities.

2) Responsibility to protect MLA's business and to use company resources correctly

In performing their duties, MLA's people should take the necessary steps to protect company assets and other resources including equipment, and other valuable property including, but not limited to, confidential information and intellectual property such as inventions, trade secrets, formulae, databases, know-how, recipes, customer lists, software, drawings, and reports.

The use of MLA time, material, or facilities should be for purposes directly related to company business. Incidental personal use of such company resources as computers, phones, faxes, copiers and internet access is permitted, but employees must ensure that MLA's interests are not harmed.

More information is available in MLA's *Levels of Authority Policy and Corporate Card Policy*, and the IT policies.

3) Protecting confidential information

MLA's people must safeguard confidential information of the Company by not transferring, publishing or disclosing it other than when necessary in the ordinary course of business or as directed by MLA or as required under relevant laws or regulation.

4) Responsibility to individuals

MLA is committed to the fair and equal treatment of all its employees and abides by the employment laws of the countries in which it operates. Employees and candidates for employment shall be judged on the basis of their ability and qualifications without regard to race, gender, religion, sexual orientation, disability, age, marital status or political belief.

Every individual has the right to dignity and respect in the workplace and MLA will not tolerate discrimination, including sexual, physical or verbal harassment or other demeaning behaviour against any individual or group of people. MLA does not tolerate violence or threats of violence.

MLA's privacy policy is designed to protect privacy of personal information and other rights of individuals in accordance with law. MLA respects the privacy of individuals and only acquires personal information for business purposes and such information is only used for its intended purpose. *See MLA Privacy Policy.*

5) Acting responsibly on safety, health and the environment

In MLA, we regard management of safety, health and the environment as an integral and very important part of our business.

We believe that all injuries, occupational illnesses and environmental incidents can be prevented. Management is accountable for safety and environment performance, and all employees are expected to take personal responsibility and be involved in setting standards and improvement initiatives.

Employees are responsible for reporting safety hazards and work-related accidents and injuries.

6) Avoiding conflicts of interest

A conflict of interest describes any circumstances which could cast doubt on an employee's ability to act with total objectivity with regard to MLA's interests. (Board of Director conflicts of interest are dealt with separately outside this code). All employees should avoid financial, business or other relationships which might be opposed to the interests of MLA or may conflict with the performance of their duties.

To avoid circumstances where there is even the appearance of conflict between personal and Company interests, employees should seek approval from the Managing Director through their general manager prior to working or consulting for or having any other key role in an outside organisation which has dealings with MLA. *(This does not relate to being involved in businesses with industry related transactions such as levies.)*

Employees of MLA must not trade cattle futures contracts, or have any direct or indirect beneficial interest in cattle futures contracts traded on the Sydney Futures Exchange (SFE). MLA employees are prohibited from having any interest in a participant in the SFE ("participants" in the SFE are brokers admitted to or a member of the SFE and includes a director, partner, employee, consultant, agent or authorised representative of the broker or member). The SFE may grant exemptions to this prohibition if it can be shown that there will be no conflict of interest. Any breaches or suspected breaches on the prohibition against trading cattle futures contracts or having a beneficial interest in a contract or in a participant must be immediately reported to the General Manager Corporate Services.

7) Gifts, gratuities and entertainment

MLA employees must not solicit or accept any form of gift, service or hospitality (including cash) that may influence or appear to influence a business decision. Employees may, however, accept invitations to reasonable corporate events that will help encourage good working relationships between MLA and its suppliers. In addition employees may accept gifts which are of a nominal value and which are consistent with normal business practices and/or local customs.

Employees must not seek to gain special advantage for MLA or themselves through the use of business gifts, favours or entertainment. Business entertainment should

be moderately scaled and clearly for business purposes and could not be construed as a bribe or improper inducement.

If an employee has any doubts in relation to receiving or providing gifts or entertainment, they should discuss it with their manager or their general manager.

8) Integrity in financial reporting

MLA is committed to providing accurate, timely and clearly understandable disclosures in reports on its activities to members and other Stakeholders and to Government. We exercise the highest standard of care in preparing such reports.

All material financial information and disclosure must be accurately represented in the company's accounts. No information may be concealed by employees from either MLA's internal or external auditors. No Director, officer or employee may take any action to influence, coerce, manipulate or mislead the company's auditors in order to produce misleading financial statements.

9) MLA's responsibilities to members, stakeholders and others

MLA will strive to increase the value of the red meat industry and promote the interests of all stakeholders through:

- effective operation of the company, including preparing and implementing strategies, budgets, plans and policies
- identification and implementing opportunities for improving results
- clear and honest reporting of results
- effective management of the company's business risk and safety, occupational health and environmental issues
- protecting property and other assets, confidential information and intellectual property

MLA will achieve these through:

- employing appropriately qualified and motivated management and employees
- the MLA Board effectively overseeing strategic and business proposals and planning
- effective internal risk management structures and audit functions overseen by the MLA Board and its sub-committees

10) Acting responsibly with customers, suppliers, competitors and others

For purposes of the discussion below, customers include purchasers of our publications and research materials and customers of the Australian red meat industry.

We must act as if we are in partnership with our customers for our mutual long term benefit. MLA's continued success depends on their continued support. Employees must not misrepresent our products or services and must not make false claims about those of our competitors.

Suppliers, too, are important to our continued success in delivering value to the Australian Red Meat Industry. MLA will be fair and honest in our dealings. The

company's purchasing decisions must be based on such commercially competitive factors as quality, price, and consistent reliability and a supplier's level of service.

11) Responsibility to the community

MLA is committed to being a responsible corporate citizen. We recognise our responsibility to deal effectively and appropriately with the communities in which we operate.

We are committed to protecting the environment in which we operate.

12) Complying with the law

MLA will only conduct business by lawful and ethical means. Legal responsibilities change and employees at all levels must keep themselves informed and comply with all legal responsibilities.

MLA employees working in company operations outside Australia must follow local legal requirements, including responsibilities for individual rights; safety, health, the environment and the community. Where these are less stringent than the standards prescribed by Australian law or international protocols, MLA employees should strive to follow relevant Australian standards. If employees do not understand their responsibilities and the company's obligations, they must seek guidance from their manager or MLA Legal.

13) Political and other contributions/ donations

No political contributions may be made by the Company.

With the approval of the Managing Director, the company may make gifts or payments to governments, government agencies or registered organisations in support of humanitarian, athletic and/or civic causes if such gifts are for the benefit of the red meat industry.

14) Compliance with the code

Compliance with this code and MLA's policies is a term of employment at MLA. Breaches of the code will be subject to disciplinary action up to termination of employment, if appropriate.

Any MLA employee who becomes aware of a possible breach of this code should report this to their manager or any member of the executive team or, if preferred, to the Managing Director. Such reports will be treated confidentially. No employee will be subject to disadvantage by reason of a bona fide report of possible non-compliance

All significant matters will be reported to the Managing Director who will report to the Audit Committee any material breaches of this code.

MLA employees are required to sign a certificate of compliance signifying that they have read this code and have complied with it. This will be done on a yearly basis.

We are committed to open and frank communication in MLA workplaces. If employees are in doubt about any action, they should contact their manager or a member of the executive team for approval or guidance.

15) Publication

This code will be published on the Company's intranet site and all new employees will be made aware of this code.

Updated 29 May 2006