

Policy Owner	Human Resources
Compliance	Mandatory
Approved by	Managing Director
Document	Policy
Effective Date	September 2014
Last Revised	June 2012
Next review	September 2016
Contact	Legal Counsel



Code of Business Conduct & Ethics

POLICY STATEMENT	
Who does this policy apply to?	All of MLA’s people, including the Directors, management, employees and contractors are expected to have a commitment to the standards in this <i>Code of Business Conduct and Ethics</i> . The standards go beyond compliance with laws and regulations and embrace MLA’s values and commitments to its stakeholders.
Policy statement	<p>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.</p> <p>MLA’s <i>Code of Business Conduct and Ethics</i>, 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.</p> <p>The standards set out in the Code are not intended to be exhaustive and 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.</p>
Values	<p>Deliver value for levy payers and government</p> <ul style="list-style-type: none"> • Deliver value and results for producers and co-investors • Demonstrate respect for views and opinions of levy payers • Be accountable and transparent with actions and decisions <p>Integrity</p> <ul style="list-style-type: none"> • Take personal responsibility and be accountable • Act ethically • Do what we say we will do <p>Agility</p> <ul style="list-style-type: none"> • Be flexible to change as circumstances change • Have the capacity to respond • Act quickly enough to have an impact • Plan with contingencies and options <p>Collaborative</p> <ul style="list-style-type: none"> • Share knowledge and experience • Understand and use appropriate skills for specific shared outcomes • Seek broader knowledge of activities across the company • Don’t waste time <p>Innovative</p> <ul style="list-style-type: none"> • Actively seek creative solutions • Constantly lift the bar

<p>Commitments</p>	<p>MLA’s commitments define the relationship that we strive to achieve with our key stakeholders. Our Commitments include:</p> <p><u>Our employees:</u> 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</p> <p><u>Our members and industry stakeholders:</u> 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</p> <p><u>Our customers:</u> 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.</p> <p><u>Our suppliers:</u> We are committed to open and honest dealing with our suppliers, recognising their contributions in providing best value for MLA’s stakeholders.</p> <p><u>Our communities:</u> 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.</p>
<p>Openness, Integrity and Fairness</p>	<p>MLA’s people will conduct themselves in a manner free from harassment, prejudice and favouritism, with openness, integrity and will deal fairly with others, including other employees, members and industry stakeholders, customers, suppliers and our communities</p>
<p>Responsibility to protect MLA's business and to use company resources correctly</p>	<p>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.</p> <p>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.</p> <p>More information is available in MLA’s <i>Levels of Authority Policy and Corporate Card Policy</i>, and the IT policies.</p>
<p>Protecting confidential information</p>	<p>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.</p>
<p>Responsibility to individuals</p>	<p>MLA is committed to the non-discriminatory treatment of all its employees and it 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.</p> <p>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 bullying, violence or threats of violence.</p>

	<p>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 collects personal information with the consent of individuals and for business purposes and such information is only used or disclosed for its intended purpose. <i>See MLA Privacy Policy.</i></p>
<p>Acting responsibly on safety, health and the environment</p>	<p>In MLA, we regard management of safety, health and the environment as an integral and very important part of our business.</p> <p>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.</p> <p>Employees are responsible for reporting safety hazards and work-related accidents and injuries.</p>
<p>Avoiding conflicts of interest</p>	<p>A conflict of interest refers to any circumstances which could cast doubt on an employee's ability to act with total objectivity or is in conflict with regard to MLA's interests. (Board of Director conflicts of interest are dealt with separately outside this code). This includes, direct and indirect financial, business or other relationships which are or might be opposed to MLA's interests or conflict with the performance of their duties. Indirect interests may arise in relation to immediate family (includes spouse and children, as well as any other close family associate). Your interests could also include any investment vehicle, trust or business, which may benefit your or your immediate family. 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.</p> <p>To avoid circumstances where there is even the appearance of conflict between personal and Company interests, employees must immediately disclose the actual or possible conflict in writing to their General Manager prior to working or consulting for or having any other key role or familial relationship in an outside organisation which has dealings with MLA. <i>(This does not relate to being involved in businesses with industry related transactions such as levies.)</i></p> <p>If an employee wishes to:</p> <ul style="list-style-type: none"> • Undertake secondary employment or consultancy work; • Work in a voluntary capacity for a charity or community organisation that may conflict with MLA's interests; • Take up any other role in an outside organisation or any other undertaking which has dealings with MLA which might embarrass or conflict with MLA's interests. <p>they must seek prior written approval from the Managing Director, through their General Manager.</p>
<p>Gifts, gratuities and entertainment</p>	<p>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.</p> <p>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.</p>

	<p>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.</p>
<p>Integrity in dealing with governments</p>	<p>The global nature of our industry requires that we sometimes need to interact with officials of various governments around the world. MLA employees and contractors must not offer or make any payments in money, product or services to any foreign government official – directly or indirectly – in return for favourable treatment or to affect any government decision. See Anti-Bribery Policy for more specific guidance about payments to government officials.</p>
<p>Integrity in business dealings</p>	<p>In the promotion of the red meat industry within and outside Australia, MLA assists Australian companies throughout the supply chain through introductions with potential buyers and investors, identifying agents and distributors, sometimes with third party intermediaries, arranging trade visits and conducting hospitality and promotional events. MLA employees and contractors must not offer or make any payments in money, product or services in exchange for an improper business advantage. See MLA's <i>Anti-Bribery Policy</i> for more specific guidance.</p>
<p>Integrity in financial reporting</p>	<p>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.</p> <p>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.</p>
<p>MLA's responsibilities to members, stakeholders and others</p>	<p>MLA will strive to increase the value of the red meat industry and promote the interests of all stakeholders through:</p> <ul style="list-style-type: none"> • 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 <p>MLA will achieve these through:</p> <ul style="list-style-type: none"> • 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
<p>Acting responsibly with customers, suppliers, competitors and</p>	<p>For purposes of the discussion below, customers include purchasers of our publications and research materials and customers of the Australian red meat industry.</p> <p>We must act as if we are in partnership with our customers for our mutual long</p>

<p>others</p>	<p>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.</p> <p>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.</p>
<p>Responsibility to the community</p>	<p>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.</p> <p>We are committed to protecting the environment in which we operate.</p>
<p>Media, internet and social network sites and commentary</p>	<p>Employees must not make statements or comments to the media, other external bodies, through or on the internet or in social networking sites regarding MLA, MLA's confidential information, its business dealings, its financial status or its employees or customers unless authorised to do so by MLA. See MLA Media Policy and MLA Social Media Policy.</p> <p>Employees must direct all media enquiries to the Media Manager or General Manager, Communications & Stakeholder Engagement.</p>
<p>Complying with the law</p>	<p>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.</p> <p>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.</p>
<p>Political and other contributions/donations</p>	<p>No political contributions may be made by the Company.</p> <p>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</p>
<p>Compliance with the code</p>	<p>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.</p> <p>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 an annual basis.</p>
<p>Reporting non-compliance (Whistleblower Process)</p>	<p>In order to reinforce our commitment and raise general awareness of the Code all employees are required, on an annual basis, to complete an Employee Certificate of Compliance. The Certificate of Compliance can be found on the intranet.</p> <p>At any time an MLA employee who becomes aware of a possible breach of this code should report this to a General Manager, the Head of Human Resources, MLA's Legal Counsel, Company Secretary or, if preferred, to the Managing Director. Where possible, such reports will be treated confidentially. However, in</p>

certain situations MLA may be required to formally disclose information in accordance with applicable legislation.

Should you not feel comfortable reporting a possible breach to the internal contact points referred to in the last paragraph you are able to report it to MLA's independent and confidential external whistleblower service provider STOPline (please refer to the *Whistleblower Policy*).

No employee will be subject to disadvantage by reason of a bona fide report of possible non-compliance

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

Approval			
Version Number	Approved by:	Effective Date:	Unique ID Number:
V2-0	Managing Director	September 2014	PV0001