



Our Code of Conduct



Our Values



Quality

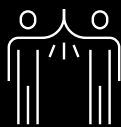
Best possible
output



Integrity, Honesty and Respect

Be One Team,
Do The Right Thing

Safe & Rewarding
Place To Work



Customers

I Listen, Learn
and Partner

Creating
Opportunities



Performance

Own It
Treat It Like
Your Own



Innovation

Technological
Leadership
In Products &
Processes

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Welcome

Our Code of Conduct ('the Code') sets the standards and guidelines for acceptable practices by Health and Plant Protein Group, its people and communities in which we operate. These behaviours and responsibilities extend to how we treat our Board of Directors, Executive Team, all employees, contractors, visitors, customers, business partners, shareholders, members of the community, our environment and wildlife.

Objective

Our objective of the Code is to clearly set the guidelines which every person in the business is always required to abide by.

Expectations

Health and Plant Protein Group (HPP) is committed to ensuring that the Board, management, and employees exhibit the highest level of personal integrity and honesty and provide superior service.

In adhering to the Code, the following standards are expected:

- obey the law;
- respect every employee's dignity, rights, freedoms and individual needs; provide a working environment that is safe, challenging and rewarding; recognise the work of our employees; and
- reinforce the organisation's commitment to the highest standards in business and professional ethics.

In adhering to the Code, all employees will:

- obey the law;
- treat everyone with honesty, courtesy and respect;
- respect and safeguard the organisation's property and that of fellow workers; maintain confidentiality;
- perform duties to the best of their ability considering their skills, experience, qualifications and positions;
- do their job in a safe, responsible and effective manner;
- ensure their personal business and financial interests do not conflict with their duty to Health and Plant Protein Group; and
- comply with Health and Plant Protein Group policies, procedures, and rules.

Together with our values and behaviours, policies and procedures, the Code is a guiding document that sets out the principles on how we do the right thing by the business and each other.

When the outlined expectations are met, it enables the right leadership and culture to drive performance in an environment which makes Health and Plant Protein Group a great place to work. The Code has the full support of the Board of Directors and Executive Team.

Albert Tse
Executive Chair

Review date: 25 July 2022

How this Code applies to you



Who Does This Code Apply To?

This Code applies to all Health & Plant Protein Group Board, management, and employees. The Board, management and all employees are required to provide a signed copy of the Code of Conduct Declaration to the Company Secretary on commencement and every three years. Employees who contract the services of agents, contractors or consultants must ensure that the agent, contractor, or consultant receives a copy and complies with this Code.

Where Can I Get A Copy Of The Code?

A copy of this Code can be found on our website. All new employees will also be provided a copy.

<https://www.hppgroup.com/investor-centre/corporate-governance/>

Adherence To The Code

This Code has the full support of the Health and Plant Protein Group Board of Directors and Executive Team.

Compliance with this Code is taken seriously. Employees and management who disregard the Code are subject to disciplinary action, including instant dismissal for gross misconduct. Failure to comply with the Code by agents, contractors or consultants may result in Health and Plant Protein Group not engaging with those businesses.

Reporting Breaches Or Concerns / Speak Up

You have a responsibility to immediately report any breaches or suspected breaches of this Code by a colleague to your Manager or the Executive Director or Chair.

Some examples of concerns include, but are not limited to:

- risks to the health and safety of a person
- suspected fraud
- corruption; and
- illegal activity

All reports will be kept confidential and no employee will be disadvantaged or prejudiced by reporting in good faith a breach or suspected breach of law, regulation, or this Code.

For more information on how to make a report, refer to Health and Plant Protein Group Whistleblower Policy which is designed to protect whistleblowers, and encourage the raising of important issues or concerns.

A guide to making good decisions

The following section provides conduct guidance in relation to specific topics. Employees are also required to read the company's related policies referenced below.

Employee Conduct

Personal Conduct

Our personal conduct is to be consistent with the Code.

We will deal fairly and honestly with each other, clients, business suppliers and competitors.

This means:

- handing all internal and external client contacts with professionalism and courtesy; and
- reporting to work as scheduled, keeping absences to a minimum, and when an absence is necessary, promptly notifying your Manager of the reason.

To ensure a productive and safe workplace, the following are not permitted:

- working in an unsafe manner;
- misusing or adjusting Health and Plant Protein Group property, plant, equipment or services (e.g. telephone, email, etc.);
- using, possessing or trafficking illegal or unprescribed drugs;
- using offensive language, unwarranted or violent physical behaviour;
- harassing, intimidating or abusing others in any manner;
- using access of the company's or own electronic media to intimidate, denigrate or pass any judgement on the company or another employee's activities which may bring Health and Plant Protein Group into disrepute; and
- using any equipment or plant which you are not authorised or trained/accredited to use.

Work Attire

- During working hours, production, harvesting and warehousing employees are expected to wear appropriate PPE (personal protective equipment) where specified as part of their role, or part of site requirements and/or to use or wear specified clothing, footwear or equipment provided.
- Office-based employees are required to be well groomed and dress in a manner appropriate to a business environment.

Alcohol, Drugs And Smoking

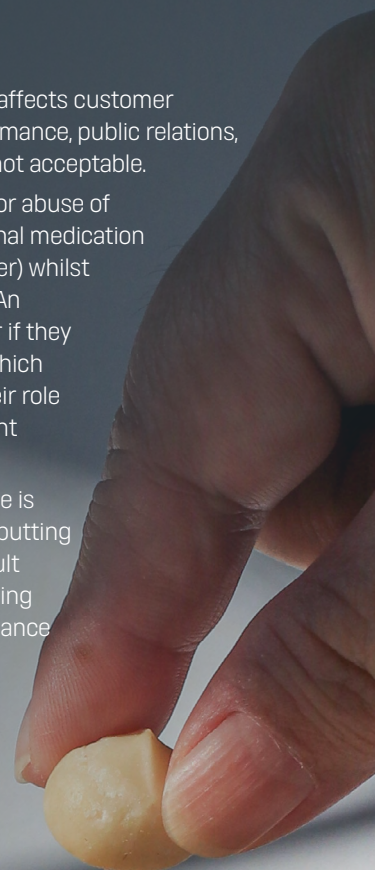
The consumption of alcohol where it affects customer service, other employees, work performance, public relations, safety, or where it violates the law is not acceptable.

The possession or use of illicit drugs or abuse of prescription drugs (other than personal medication as prescribed by a medical practitioner) whilst performing duties is not acceptable. An employee must inform their manager if they are on any prescription medication which may affect their ability to perform their role or if the employee operates equipment or a vehicle as part of their role.

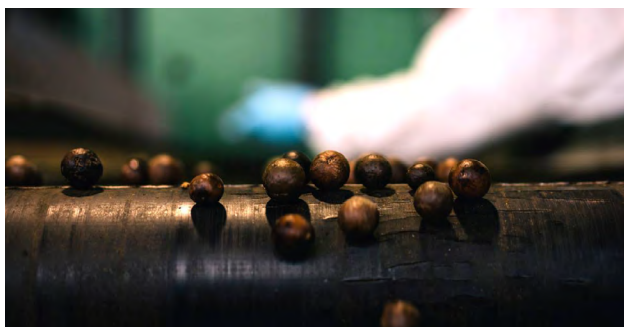
Where it is identified that an employee is consuming alcohol and drugs and is putting other employees at risk, this may result in disciplinary action up to and including termination of employment in accordance with the Fair Treatment Procedure.

The company will offer confidential support to any employee who seeks assistance in dealing with any substance abuse via our external Employee Assistance Provider.

(Reference – Fit for Work Policy)



A guide to making good decisions Cont'd



Family and Friends Business Activities

A potential conflict of interest may arise due to the business activities of an employee's partner, relatives or associates. An employee has a potential conflict of interest whenever a partner, relative or associate has a significant interest in a transaction with the company or a significant relationship with any competitor or supplier.

Employees should not make or influence any decision which could directly or indirectly benefit a partner, relative or associate. In order to protect all parties for the potential for, or appearance of, a conflict of interest, appropriate disclosures should be made to the relevant Manager.

(Reference – Anti-Bribery & Corruption Policy)

Community Activities

The company encourages its employees to participate in professional associations, trade associations, charitable or service organisations and other community activities.

Employees should ensure that where any non-business activity is likely to involve a substantial commitment of time, it does not impact on their ability to satisfactorily perform their assigned work for the company. If outside activities adversely affect an employee's work performance, he or she may need to consider modifying the activity.

Where the outside activity involves service as a member of local government or other political activity, there should be no specific or implied company endorsement of such activity.

Where employees wish to speak at a public function, or write an article in their own right, but not as a representative of the company, such activity is permissible provided that:

- company information is not divulged;
- company name(s) or logo(s) do not appear (unless permission has been obtained from the Executive Director)
- where necessary, employees clearly indicate that they are not speaking or writing as representatives of the company.

Ethical Behaviour

Inclusion & Diversity

Health and Plant Protein Group recognises that an inclusive and diverse workforce supports its goals to achieve business success through the diversity, quality, and skill of our people. We appreciate that each employee brings their own unique capabilities, experience, and characteristics to their work.

Health and Plant Protein Group diversity encompasses differences in:

- ethnicity;
- gender;
- language;
- age;
- sexual orientation;
- socio-economic status;
- physical and mental ability;
- thinking styles;
- experience and education; and
- religious and cultural beliefs.

We are committed to employing the best people based on merit and performance. We believe that the wide array of perspectives that results from such diversity promotes innovation, creativity, flexibility, and business success. It makes us more productive, unique and competitive.

(Reference – Inclusion and Diversity Policy)

Fair Competition

Fair competition means that we will:

- know about and follow Health and Plant Protein Group' legal obligations, purchasing, contracting, capex policies and procedures; and
- compete on the basis of customer service and non-obstructive competitive conduct.

As part of our commitment to fair trading, management and employees will:

- not differentiate unfairly between customers when supplying products or services;
- not refuse to deal with, or discriminate against, a customer for any improper reason;
- not intimidate or threaten another person or organisation; and
- only use our strengths in legitimate ways.

We aim to be an effective competitor and to deliver services according to accepted industry and ethical standards.

Ethical Behaviour Cont'd

No bribes, payoffs or kickbacks will be paid or accepted.

In all dealings with others, we will be courteous, well-informed, truthful and careful not to misrepresent the quality, features or availability of our services.

Competitive information will be obtained only by ethical means – attempts to collude with internal or external stakeholders to gain or provide competitive information are not permitted.

(Reference – Anti-Bribery & Corruption Policy)

Gifts, Entertainment & Services

Directors and employees who accept gifts, entertainment and gratuities or any other direct or indirect personal benefit from or through any person or concern which has business, seeks to have business or competes with the company must use extreme caution to ensure against any possible impropriety, alleged offence or embarrassment to the company.

Employees should not accept gifts from a competitor or from anyone having or seeking business with the company other than non-cash gifts of up to the value of \$250 without the written authority of the Executive Director. Any such gifts must be considered in the context of the business relationship between the donor and the company.

Participating in business-related functions, including accepting lunches or other meals with a supplier or competitor is a permissible business practice only with the approval of the employee's Manager. However, care should be exercised to ensure these functions have an underlying business purpose and that their value and frequency are not excessive.

Particular care should be exercised in ensuring that any function falls within the limits of socially acceptable behaviour and that the employee's presence does not reflect negatively on the company.

Employees should not enter into any loans or receive or purchase any goods or services from any supplier on terms that are more favourable than those available in the normal course of private business without prior approval from the Executive Director.

Where any doubt exists regarding the acceptance of any gift, entertainment, goods or service, advice should be obtained from the Executive Director.

(Reference – Gifts, Hospitality and Entertainment Policy)

Contract Negotiations

In negotiating contracts, be accurate and complete in all representations. The submission to a customer of a proposal, quotation or other document or statement that is false, incomplete, or misleading can result in civil and/or criminal liability for the Company and the involved employee(s) who engage in or condone such a practice. In negotiating contracts, we will comply with all contractual requirements in a fair, honest and ethical manner.

Fees and Commissions

Commission or fee arrangements should only be made with companies, firms or individuals serving as bona fide commercial representatives, agents or consultants. Enquiries should be made to ensure that such arrangements are not entered into with any company or firm in which a government official or employee is known to have an interest unless the arrangement is permitted by law and has been specifically approved by the Executive Director. All commission and fee arrangements should be by written contract. Fees are to be reasonable and consistent with normal practice for the industry, the merchandise involved and the services rendered. Payments should not be made in cash.

Improper influence

- No pressure is to be put on employees to influence their personal preferences in private or political matters.
- Further, no approval, disapproval or judgement should be expressed by an employee of another employee's private political or personal preference or activities.



Business & Lawful Processes

Company Policies & Procedures

Health and Plant Protein Group (HPP) policies and procedures are developed to ensure the business operates in a safe, consistent, effective, and legally compliant manner.

All employees must comply with all of Health and Plant Protein Group policies and procedures.

If you are unsure about any policy or procedure you should discuss the relevant policy or procedure with your Manager.

Equal, Bullying & Harassment

At Health and Plant Protein Group, we are all responsible for fostering a working environment where everyone is treated with trust and respect. This includes not engaging in conduct or behaviour which involves unlawful discrimination, bullying or harassment.

Health and Plant Protein Group equal opportunity objectives are:

- to eliminate discrimination and harassment in the workplace;
- to create a workplace that is free of discrimination and victimisation where each person has the opportunity to progress to the full extent of their ability;
- to ensure that staff are made aware of their rights and obligations; and
- to provide a mechanism which enables any reports of discrimination, harassment, bullying and victimisation to be investigated thoroughly, fairly, and confidentially.

It is unlawful for anyone to discriminate against, harass or bully others. An individual may be subject to a disciplinary process or held personally and legally liable for any action brought by another person.

(Reference – Workplace Harassment and Bullying Policy, Diversity and Inclusion Policy, Equal Opportunity and Anti-Discrimination Policy)

Investment and Insider Trading

Employees who may consider themselves to be in possession of share price sensitive information concerning publicly listed companies, must make themselves familiar with the law governing "insider trading" and related issues.

Employees may not trade in the securities of any other company, or buy or sell any property or assets, on the basis of non-public information acquired through employment at HPP, whether such information comes from the Company or from another company with which HPP has a confidential relationship.

Employees may own shares or other interests in any public or private company. In most cases these interests will not present a problem. However, employees should carefully assess the potential for a conflict of interest where they, their partners, or other relatives own shares or other interests in a company or firm that is a trade customer of, supplier to, or competitor of the company. If a potential conflict of interest appears to exist, then the facts of the matter should be disclosed to the employee's immediate supervisor.

Funds

Every employee who has control of Health and Plant Protein Group funds is personally, accountable for them.

Funds can mean electronic fund transactions, cash, gift vouchers or fuel charge cards.

Misuse will be treated as a serious breach. Theft of any item purchased via company funds is also unacceptable.

(Reference – Anti-Bribery & Corruption Policy)

Law

Health and Plant Protein Group is subject to Municipal, State and Federal laws. We have a duty to obey the law.

No one can be directed to carry out an illegal act, and no one can justify an illegal act by claiming to be acting under the order of a Manager, Senior Officer, another employee, or to be simply complying with policy. An employee is also not allowed to commit a fraudulent or malicious act.

Any employee who is caught performing an illegal act will be subject to disciplinary action and may also be subject to legal action.

All employees are encouraged to immediately report illegal actions by others to their direct Manager or Company Secretary. Confidentiality will be maintained when such reports are made.

(Reference – Anti-Bribery and Corruption Policy, Whistleblower Policy)

Protection of Information

As employees, we maintain the privacy of Health and Plant Protein Group information and protect it from any inadvertent disclosure. Most of our information relates to clients and suppliers who expect, on both legal and ethical grounds, that this information will be protected.

(Reference – anti-bribery and corruption policy)

Customer Service

All employees will strive to provide a superior level of customer service at all times.

A customer with a concern is to be treated politely and with respect. The concern is to be resolved as quickly as possible.

Environmental Protection & Sustainability

In accordance with Health and Plant Protein Group Sustainability and Environment Policy, the company is committed to fulfilling its moral and legal environmental responsibilities related to, but not limited to:

- airborne particulate and gas discharge;
- sewer and drainage discharge;
- non-renewable natural and generated resources such as fuel, water, electricity and gas;
- recycling of materials and waste minimisation;
- land usage and reclamation;
- carbon emissions;
- maintaining a sustainable environment; and
- protection of wildlife and bees.

All employees have a responsibility to protect the environment and use sustainable work practises in their immediate work activities and areas of influence.

Leaving Health and Plant Protein Group's Employment

On leaving Health and Plant Protein Group, you must surrender any assets or items containing Health and Plant Protein Group information to your manager.

Even after leaving Health and Plant Protein Group, you have a continuing obligation to maintain the confidentiality of issues and projects whilst employed by Health and Plant Protein Group unless you have sought and obtained written consent from the company to utilise such information.

Property

We all share the responsibility for looking after Health and Plant Protein Group property, especially if it is under your control.

Health and Plant Protein Group property must not be removed without authorisation or used for personal benefit or any other improper purpose.

Health and Plant Protein Group property may only be given away, lent, destroyed or otherwise disposed of, if this action is properly authorised in writing, no matter how old or damaged an item may be. The relevant asset register must be appropriately noted.

Private & Work-related Company Vehicle Usage

Anyone using a company vehicle must ensure that it is not used in a way that will reflect poorly on Health and Plant Protein Group reputation in the wider community. Vehicles must not be used for unauthorised purposes.

Only employees who have been given prior authorisation and have a current and appropriate Drivers Licence may drive Health and Plant Protein Group vehicles.

Employees given prior authorisation may use their own vehicle for work related purposes provided their vehicle is roadworthy and insured.

A company vehicle which is issued to an employee inclusive of travel to and from work shall only be used within those parameters. A company vehicle is not to be lent to a family member or used in lieu of your own vehicle for purposes other than work.

An employee issued with a company vehicle shall maintain a log book and record the travel date, destination, kilometres and purpose of each trip..

(Reference – Remuneration and Motor Vehicle Policy)

Privacy of Communication

Customers and employees expect their communication with Health and Plant Protein Group to be kept secure and confidential. The Privacy Act 1988 also provides sanctions against improper use of personal information.

As a Health and Plant Protein Group employee, you will not:

- disclose any confidential information for any reason other than the purpose it was collected for;
- use any information to your personal advantage;
- permit unauthorised persons access to information not concerning them.

Requests from police, government agencies or anyone outside Health and Plant Protein Group, for information about employees or customers, is to be directed to the relevant Manager or Company Secretary.

(Reference – Privacy Policy)



Quality

All employees have an obligation to ensure that products or services which do not meet the required standard are identified and reported to the appropriate management level.

Health and Plant Protein Group is committed to supplying its customers with goods that meet or exceed the required specification.

Safety

HPP's Zero Harm and Wellbeing strategy is committed to providing its employees with a working environment which is healthy, safe and productive, from both a mental and physical wellbeing perspective.

All employees are required to participate in the company's training programs which are implemented for each specific site and role.

Under the *Occupational Health and Safety Act* (Federal and State) it is illegal for anyone to partake in behaviour that may endanger themselves or others.

Your Manager can advise you of relevant safety and induction training that is specific to your area. Your site-specific safety instructions must always be observed. If in doubt, ask your Manager and, if necessary, specialist or technical advice may also be available through the Company Secretary.

It is everyone's obligation to maintain a safe work environment and any hazard must be immediately attended to and reported to your Manager and Company Secretary.

(Reference – *Workplace Health and Safety (WHS) Policy*)

Social Media & Technology

Social media through various means of electronic devices such as computer, laptop, phone or iPad etc, is an accepted means of individuals and organisations exchanging information.

At times, this communication avenue has been used to denigrate, embarrass or harass others. Such usage is not acceptable and may result in disciplinary action.

Use of personal devices for inappropriate activities, whether in company or own time, may breach another employee's or the company's confidentiality, ethics and/or trust. It is therefore important that all employees understand that inappropriate behaviour at, or outside work has potential employment and perhaps legal consequences.

All employees need to be aware that work related use of communication options is generally for work related purposes, however limited personal usage in lunch breaks for legitimate purposes is appropriate. Distribution of inappropriate material using company provided technology is not permitted.

Inappropriate material is material that may be considered offensive, pornographic, insulting, discriminatory, confidential, inaccurate, unprofessional or a combination of these factors. This list is not exhaustive.

Any storage of excessive or inappropriate amounts of personal data on company systems is not appropriate and all storage systems are subject to access by company authorised officers.

Claims & Complaints

In responding to any claims or complaints against Health and Plant Protein Group, we will investigate the issue objectively and ensure that the complainant is kept informed of the progress.

(Reference – *Grievance and Complaints Policy*)



Additional responsibilities for leaders

If you are a leader or manager, you have some additional responsibilities under the Code

Responsibility

You are accountable for all aspects of the area you supervise. You can delegate tasks but your overall accountability for the actions of those you supervise cannot be delegated. You must take steps to identify and manage the risks in your area, including the conduct of your team. You must support your team to abide by this Code and hold them responsible for doing so.

Consequences

As a leader, you are responsible for taking appropriate action to address business conduct issues in a fair, consistent and timely way, and to ensure the consequences of misconduct are recorded.

Set the tone, lead by example and manage fairly and consistently.

Listen

You are responsible for fostering a culture that encourages people to feel comfortable and safe about speaking up and raising concerns. Take time to listen and act appropriately when others come to you to raise a concern. Once you become aware of an issue or incident you must escalate it in accordance with this Code.

If a team member who has raised a concern with you wants their identity to remain confidential, you must be aware of your obligations around protecting their identity. You must also be aware that retaliatory action against that team member is prohibited. Contact Health and Plant Protein Group Executive Director if you are unsure how to deal with an issue.

Speak up

We value your help in avoiding and uncovering possible misconduct. When you report your concerns, you help us to prevent problems from occurring or remedy misconduct that has already happened. In the process, you are making a valuable contribution to assist Health and Plant Protein Group keep the trust and respect of all its stakeholders.

Each one of us has an obligation to speak up when we have concerns that something isn't right, or if we have made a mistake. We accept mistakes will be made and not everything goes to plan. What is important is how you deal with these situations.

Ask questions and challenge the way things are done if you think it is wrong or can be done better. You must speak up if you genuinely feel you are under pressure to do something which is or may be inconsistent with this Code, our policies or our values.

For most matters, you should raise it first with your manager or your manager's manager. If you feel uncomfortable about doing that for any reason, the accompanying tables provide further guidance on where else to go.

Our Whistleblower Service provides an additional avenue for you to confidentially escalate any suspected reportable conduct. There are both internal and independent options to report conduct of concern. You can be confident your confidentiality will be respected and that there will be no retaliation if you use this service.

We are committed to a work environment where no-one is subject to retaliation or victimisation for reporting genuine concerns or suspected misconduct. Retaliation includes demotion, dismissal, job reassignment, threats or social exclusion.

How do you Speak Up

Your Call –

Eligible Whistleblowers are encouraged to speak up by contacting HPP's external and independent whistleblower service provider named: Your Call Whistleblowing Solutions ("Your Call") to receive and manage your report and concerns confidentially.

This option allows you to:

- Remain completely anonymous; or
- Identify yourself to Your call only; or
- Identify yourself to both Your call and an appropriate person of HPP.

The your call reporting options include:



Website (24/7)

www.yourcall.com.au/report

Log in using the unique identifier code HPP1

You can upload supporting documentation and support securely



Telephone (9am to midnight (AEST) Business days)

Australia 1300 790 228

Outside of Australia +61 3 9895 0012
(call charges will apply)

How to use Your Call if the whistleblower has a speech or hearing impairment

If the whistleblower has a hearing or speech impairment, they can contact Your Call online. If they would like to contact Your Call by phone, they can do so through the National Relay Service by choosing the preferred contact method at www.relayservice.gov.au and requesting Your Call's hotline 1300 790 228.

Your call remains the intermediary at all times, receiving and forwarding communication between all parties. The HPP officers who will have access to your reports (but not your personal details if you remain anonymous or only identify yourself to Your Call); include:

- Lisa Davis, Chief Financial Officer / Company Secretary
- Adam Cunningham, Chief Operating Officer

Your Call can circumvent any of the above Officers upon your request.

Code of Conduct Declaration

As a Board Member / Employee (please circle) of Health and Plant Protein Group, I acknowledge that I have read and understood my obligations to Health and Plant Protein Group as detailed in this Code of Conduct.

I acknowledge that I will:

- comply with the Code;
- put safety first;
- always act with integrity to the highest standard;
- demonstrate the acceptable behaviours according to our values; and
- adopt any new or changed policies and seek clarification if I do not understand how they may affect me.

I declare that (please indicate by ticking the box):

☐ I am in a Conflict of Interest situation affecting Health and Plant Protein Group as described in this Code (please indicate describing details below).

☐ I am not in a Conflict of Interest situation affecting Health and Plant Protein Group as described in this Code.

☐ I will not knowingly become involved in a Conflict of Interest unless I have the prior written approval of the Board of Directors and Executive Team.

I understand that failure to comply with the Code or to disclose a Conflict of Interest is a serious matter and may result in disciplinary action including termination of employment.

Name:

Number:

Division/Region:

Signature:


Date:


Please return by either post or email as follows:

✉ Health and Plant Protein Group Limited
PO Box 2225
Milton Queensland 4064
Australia

@ corporate@hppgroup.com

Connect with us

 [linkedin.com/company/healthandplantprotein](https://www.linkedin.com/company/healthandplantprotein)

 www.hppgroup.com

