

CODE OF CONDUCT

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Approved September 2025

Document Control

Version #	Reviewed By	Date	Endorsed By	Date	Approved By	Date	Summary of Change
01	HR Manager	Feb 2020	BHRC	Feb 2020			
02	HR Manager	Sept 2020	BHRC	Oct 2020	Board	Nov 2020	Code of Conduct split with supporting Conflict of Interest Procedure
03	GM - HR	July 2022	BHRC	July 2022	Board	July 2022	Minor updates, role title changes
04	GM – P&C	November 2024	PCC		Board		
Document Owner							General Manager P&C
Related Documents							
Anti – Bribery, Corruption and Fraud Policy							
Corporate Travel and Expenses Policy							
Conflict of Interest Procedure							
IT Acceptable Use Policy							
IT Security Policy							
Performance Management Policy							
Procure-to-Pay Policy							
Records Management Policy							
Social Media Policy							
Whistleblower Policy							
Workplace Health & Safety Policy							
Review Requirements							
This document is next due for review in November 2026 by the General Manager P&C.							
Controlled Document Location							
https://dairyaustralia.sharepoint.com/SitePages/documenthub.aspx							

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CODE OF CONDUCT

1 Purpose

Our Code of Conduct (Code) provides a clear framework to guide how we operate daily, reflecting our commitment to an inclusive, respectful, psychologically safe and productive workplace enabling us to achieve our organisational objectives. By aligning our actions with our values — Farmer First, One Team, Innovative Thinking, and Decisive Action — we foster a positive culture that is free from inappropriate behaviour, harassment, and discrimination. Through this commitment, we uphold our standards, build trust with stakeholders, and ensure we continue to act responsibly in everything we do.

2 Scope

The Code of Conduct outlines the standards of conduct expected of all Dairy Australia employees (including fixed term or casual), Dairy Australia directors and contractors. Anyone else representing Dairy Australia or interacting with Dairy Australia including volunteers, consultants, visitors and members are expected to comply with all lawful and reasonable requests by employees including those pertaining to this Code.

The scope of the Code also extends to relationships between employees through media and social media in the public domain as outlined in Dairy Australia's *Social Media Policy*.

In the event of any inconsistency or contradiction between this policy and any employment contract, applicable legislation, or regulatory requirements, the terms of the employment contract and applicable legislation will take precedence.

3 Speaking Up

Integrity and authenticity are foundational to who we are as a for-purpose organisation, and these principles guide our interactions with stakeholders and each other. Doing the right thing without compromise is not just an expectation — it's a responsibility shared by every employee. Managers and leaders have an even greater duty to lead by example, reinforcing our Code's principles at every level of the workforce. To maintain our high standards, it is crucial that everyone feels empowered to ask questions and raise concerns when potential breaches of the Code occur. Speaking up is essential to ensuring we remain aligned with our values and continue to act with integrity.

Concerns about actual, potential, or perceived breaches of the Code of Conduct (either by our employees/directors/contractors or experienced by our employees/directors/contractors) should be reported:

- a. in writing to your manager or Chair (for directors)
- b. in writing to P&C directly if you prefer or the complaint involves your manager or Chair (for directors) by emailing: peopleandculture@dairyaustralia.com.au
- c. *Stopline*, a 24/7 independently monitored whistleblower hotline as detailed in Section 5.2 in our Whistleblowing policy (as outlined in section 5.2).

Managers are expected to engage P&C in respect to all complaints raised to assist in consistency and for reporting purpose.

Managers who receive a formal complaint from an employee are expected to refer the complaint to P&C, adhering to the principles of impartiality. A formal complaint must be submitted in writing to P&C to peopleandculture@dairyaustralia.com.au. If uncertain whether a complaint is formal or informal, P&C should be consulted.

3.1 Confidentiality of complaints

Anyone at Dairy Australia associated with the complaint (or investigation if applicable) is required to maintain confidentiality, a breach of which may result in disciplinary action.

Only those involved in the investigation or resolution of a complaint will have access to information about the complaint. In some circumstances, confidentiality may be withheld, for example where there are physical threats or there is a legal reporting requirement.

3.2 Impartiality and fairness

Dairy Australia is committed to handling all concerns and complaints impartially, discreetly, and professionally. Impartiality means treating all individuals fairly, without bias, and ensuring decisions are based on objective evidence. Complaints will be resolved in good faith, with People & Culture (P&C) and the relevant Manager jointly determining the course of action. All parties will have the opportunity to contribute before an outcome is reached.

A psychologically safe and supportive environment will be provided for both the complainant and the person against whom the complaint is made. No employee will be adversely treated for raising a concern in good faith, nor will any individual be unfairly impacted by an unproven allegation.

Dairy Australia fosters a conciliatory approach, prioritising a positive workplace culture, fairness, and constructive relationships. Intentionally false or vexatious allegations will be investigated and may result in disciplinary action.

3.3 Whistleblower Policy

Employees also have the option to report instances of inappropriate behaviour, confidentially or anonymously in accordance with Dairy Australia's *Whistleblower Policy*.

3.4 Disciplinary action

Employees engaging in any inappropriate behaviour detailed in this policy may be subject to disciplinary action up to and including termination of employment and/or civil or criminal penalties imposed by a governmental agency or court.

4 Behaviours

At Dairy Australia, we treat each other courteously and professionally at all times. A positive and respectful work environment is mandatory, and any behaviour that undermines this is counterproductive to our purpose. This requirement extends beyond the workplace and work hours; employees may be held accountable for actions outside of work that could negatively impact work performance, Dairy Australia's reputation, or its business interests.

4.1 Employees are required to:

- a. treat colleagues, suppliers, customers, visitors, or anyone else associated with Dairy Australia with fairness, dignity and respect,
- b. act ethically, responsibly, honestly and with high standards of personal integrity, and
- c. Follow all lawful and reasonable instructions or requests from the business and its managers in the performance of their duties.

4.2 Discrimination

Employees must not directly or indirectly, incite others to unlawfully discriminate against other individuals based on a protected attribute defined in this policy or at law. Such attributes include age, gender or identity, marital status, carer or parental status and responsibilities, disability or impairment, political belief or activity, pregnancy, race, religion, sexual orientation, or any other attribute protected under applicable anti-discrimination laws.

4.3 Harassment

Employees must not directly or indirectly, incite others to engage in harassment. Harassment occurs when someone is treated less favourably or made to feel intimidated, insulted or humiliated because of any of the attributes listed in 3.2. Harassment may occur as a single act or as a series of incidents.

4.4 Sexual harassment

Sexual harassment is unwanted or unwelcome sexual behaviour which could be expected to make a person feel offended, humiliated or intimidated. Sexual harassment can be physical, spoken, written or through the use of technology, and may occur as a single act or a series of incidents.

4.5 Vilification

Employees must not directly or indirectly, incite others to engage in vilification. Vilification occurs when a person engages in a public act which is offensive, insults, humiliates, or intimidates a person or a group of people, because of their actual or perceived protected attribute, or inciting others to do so.

4.6 Bullying

Employees must not directly or indirectly, incite others to engage in bullying. Workplace bullying is classified as repeated unreasonable behaviour directed towards another person or group of people that creates a risk to health and safety. Reasonable management action conducted in a reasonable manner does not constitute workplace bullying.

4.7 Victimisation

Employees must not directly or indirectly, incite others to engage in victimisation. Victimisation is subjecting a person to unfavourable treatment because they make, or intend to make, a complaint of inappropriate behaviour in good faith; or they provide information or evidence in relation to a complaint of inappropriate behaviour. Examples of victimisation in the context of employment includes demotion, dismissal, transfer, suspension or loss of a benefit.

5 Other Responsibilities

5.1 Employees

Employees must:

- a. act in accordance with Dairy Australia's values and in the best interests of Dairy Australia
- b. comply with all laws and regulations that apply to Dairy Australia and its operations
- c. comply with all Dairy Australia policies, procedures, reasonable and lawful instructions, guidelines, regulations and contracts
- d. maintain punctuality and attendance in line with agreed working hours
- e. not take advantage of property or information of the organisation or its stakeholders for personal gain or to cause detriment to Dairy Australia or its stakeholders
- f. not take advantage of their position or the opportunities arising therefrom for personal gain
- g. not make unauthorised statements to any third party including the general public about the business of Dairy Australia, or its employees
- h. report breaches of the Code to the appropriate person or body within Dairy Australia
- i. not represent Dairy Australia in any way other than in the legitimate course of employment with Dairy Australia or with written authorisation by senior management of Dairy Australia
- j. dress in a manner appropriate for their workplace
- k. participate in training as required by Dairy Australia, and
- l. if necessary, adhere to Dairy Australia's complaint management process.

5.2 Managers

Managers are additionally responsible for:

- a. role modelling appropriate standards of behaviour and upholding the Code
- b. expediently and professionally managing non-compliance of the Code
- c. seeking assistance, support and guidance from P&C in managing complaints, investigations and non-compliance, and
- d. engaging P&C to conduct formal investigations.

5.3 People and Culture

P&C is responsible for:

- a. promoting and maintaining the Code and complaint procedure
- b. coaching all parties involved in the prevention and effective management of inappropriate behaviour, and

- c. conducting and managing formal investigations into inappropriate behaviour.

6 Employee Assistance Program (EAP)

Employees can access Dairy Australia's EAP service, *Uprise* anytime at no personal cost. This is a confidential service available to Dairy Australia employees and their immediate family, and may be contacted 24 hours, 7 days on **1300 209 371**. See also <https://uprise.co/eapsupport/>

7 Conflict of Interest

All employees have a duty to avoid situations that create a conflict of interest, and declare or avoid where appropriate perceived conflicts of interest. A conflict of interest can occur when you or a family member have a personal interest, activity, or relationship that could interfere or appear to interfere with your ability to make objective business decisions in the best interest of Dairy Australia.

Examples of conflict of interest include where an employee (or a family, friend, business associate):

- Engages in activities that compete with Dairy Australia's interests, or appear to do so
- Works for, holds significant financial interest in, or provides services (such as consulting or acting as a paid advisor) to Dairy Australia's suppliers, customers, or one who seeks to do business with Dairy Australia
- Undertakes or tenders for work for Dairy Australia (as a consultant) when employed by Dairy Australia
- Acts on behalf of anyone besides Dairy Australia in a transaction with Dairy Australia (e.g. helping someone sell products and/or services to Dairy Australia).
- Uses company property, proprietary or confidential information for personal gain or to benefit a non-Dairy Australia venture
- Supervises, have a direct/indirect reporting relationship, or make employment decisions about a family member or close friend who is also employed at Dairy Australia
- Holds a second job that interferes with responsibilities and time commitments to the organisation, particularly (but not exclusively) if the second job is in a similar or competing industry.
- Sits on a board or committee of another organisation that competes with or engages in business with Dairy Australia, potentially influencing key decisions.
- Receiving or giving any gift or favour that is not permitted under this policy

Many conflicts can be avoided or properly managed when they are promptly disclosed. If you have or become aware of a real, perceived or potential conflict of interest, full disclosure is required as outlined in the *Dairy Australia Conflicts of Interest Procedure*. Permission must be sought by senior management to serve in any capacity in any other business or organisation - see the *Membership of External Boards & Committees Policy*.

Employees must:

- a. disclose any real, perceived or potential conflicts of interest in a timely manner to be appropriately managed
- b. be objective in forming professional opinions and advice
- b. not allow bias, conflict of interest, or inappropriate influence of others to override their professional judgments and responsibilities, and
- c. not undertake any agri-political activities in accordance with Dairy Australia's *Constitution* and the *Statutory Funding Contract* with the Commonwealth Government.

8 Gifts

Giving or receiving gifts can often be customary and a way to express gratitude or build goodwill in business relationships. However, giving or receiving such business courtesies with customers, suppliers, or other third-parties with whom Dairy Australia does or may do business requires careful consideration and should never be given or accepted if it might influence our professional relationships or business decisions, create a sense of obligation, or give the appearance of doing so.

This includes:

- a. offers of money (including items used in a similar way to money, or items easily converted to money)
- b. offers of discounts
- c. offers of services, and
- d. offers of shares.

Employees should always be aware of how accepting or offering a gift or like might be perceived by our levy payers, the public, by other entities we do business with, and by other Dairy Australia partners. You must follow the limits and requirements of the Code, which in some situations may require obtaining written prior approval.

8.1 Gifts or hospitality <\$200

Employees may accept gifts or hospitality, other than what is described in 6.1 above, that are offered as a courtesy that is valued under \$200 (including cumulative offers from the same source over a twelve-month period) without approval or declaring the offer on Dairy Australia's Gifts and Hospitality Register, provided that the gifts or hospitality would not be reasonably perceived as a conflict of interest.

8.2 Gifts or hospitality > \$200

Employees must declare* all gifts or hospitality that are valued at \$200 or more (including cumulative offers from the same source over a twelve-month period) on Dairy Australia's Gifts and Hospitality Register and seek appropriate written approval to accept the offers.

Where there is no opportunity to seek approval prior to accepting, employees must seek written approval within five business days.

Prior to approvals, all gifts are the property of Dairy Australia. Depending on the nature of the gift/hospitality it may be declared:

- an approved gift / hospitality for you and you are entitled to keep it, or
- an approved gift / hospitality for Dairy Australia and becomes a donation to Dairy Australia, or
- returned to the contributor, or
- donated to charity.

The following are the designated approvers of gifts/hospitality:

- Employees – your General Manager or Regional Manager
- Senior Management (Leadership Team / Regional Manager) – the Managing Director
- Managing Director – the Chair of Dairy Australia
- Directors / Chair – the Company Secretary.

** Fill in the Gifts and Hospitality Approval form on DairyHub.*

9 Confidential Information and Intellectual Property

Dairy Australia's information should be used only for company purposes and should not be disclosed to anyone outside of the company. Even within the company, only those individuals who truly need to know the information to conduct their business should have access to confidential information. Employees must:

- a. maintain confidential information
- b. only use confidential information for the purpose of performing their obligations under their employment contract
- c. not use confidential information for their own or another person's advantage or to Dairy Australia's disadvantage, and
- d. take all steps reasonably necessary to guard against unauthorised access to or disclosure of confidential information.

Confidential information means all information relating to Dairy Australia or any related companies of Dairy Australia, which is disclosed to or acquired by employees, whether orally, in writing or in electronic or machine-readable form but does not include information that:

- a. is in the public domain otherwise than as a result of a breach by employees of their employment contract, this Code of Conduct, or any other obligation of confidence employees owe to Dairy Australia or
- b. employees are required to disclose by law.

Confidential materials should:

- Be stored in a secure place and should not be left out where others can see them
- Be clearly marked as confidential
- Not be sent to unattended fax machines, scanners or printers
- Not be discussed where others may hear

9.1 Intellectual Property

As an employee, any material that you create for Dairy Australia belongs to the company. This includes research, discoveries, ideas, improvements, software programs, artwork and works of authorship. This work product is Dairy Australia's property if it is created or developed, in whole or

in part, on company time, as part of your duties or through the use of company resources or information.

Employees must promptly disclose to Dairy Australia, in writing, any such work product and cooperate with the company's efforts to obtain protection for Dairy Australia.

To ensure that Dairy Australia receives the benefit of work done by outside consultants, it is essential that an appropriate written agreement or release be in place before any work begins.

10 Use of Levy Funds and Spending Authority

Employees are expected to exercise prudence and integrity in the use of Levy funds or any other financial resources. All spending must be aligned with the organisation's purpose and be justifiable, reasonable, and in the best interests of stakeholders.

Employees with spending authority must ensure that all financial decisions are made responsibly and transparently, with a focus on achieving value for money.

11 Definitions

Term	Definitions
Employees	<p>Include all Dairy Australia employees (including fixed term or casual) Dairy Australia directors and contractors.</p> <p>Anyone else representing Dairy Australia or interacting with Dairy Australia including volunteers, consultants, visitors and members are expected to comply with all lawful and reasonable requests by employees including those pertaining to this Code.</p>
Senior management & approvals	<p>Refers to the Managing Director, General Managers and Regional Managers. References to approvals by and reporting to senior management in this document include:</p> <ul style="list-style-type: none"> • For regional employees – Regional Managers / General Manager - Regional Services • For directors – Chair of the Board • For other employees – your relevant General Manager <p>For reporting by, or approvals sought by:</p> <ul style="list-style-type: none"> • General Managers – to the Managing Director • Regional Managers – to the General Manager – Regional Services • Managing Director – Chair of the Dairy Australia Board

12 Compliance and Assurance

- The General Manager - P&C must ensure appropriate monitoring compliance processes are in place for this Policy
- Breaches of this Policy should be recorded as an incident

13 Review

In line with Dairy Australia's Policy Governance Policy, this policy is scheduled for review every two years or more frequently if appropriate.