AUSTRALIAN EATWELL PTY LTD

Group Policy

ETHICAL POLICY

Plant-Based Food Manufacturing — Regional Australia

Covers the SMETA Business Ethics and Environment pillars. Read alongside the Australian Eatwell Pty Ltd Human Rights Policy, which governs labour standards, forced/child labour, wages, hours, discrimination and harassment, and the Grievance and Whistleblowing Policy, which is the Company's single mechanism for raising workplace grievances and whistleblowing reports — those topics are not repeated here.

Document Owner	Office Manager
Approved By	Managing Director
Effective Date	20.10.2026
Version	2.0
Review Cycle	Annually, or on material change to operations, law, or a significant incident
Standards Referenced	SMETA Business Ethics and Environment pillars; OECD Guidelines for Multinational Enterprises; UN Global Compact Principle 10; Modern Slavery Act 2018 (Cth); Corporations Act 2001 (Cth) Pt 9.4AAA; Privacy Act 1988 (Cth); ISO 37001 (benchmark only)

1. Purpose

This policy sets out our commitment to ethical, lawful, and transparent business conduct — covering business integrity, environmental stewardship, product integrity, and regional community relationships — consistent with the SMETA Business Ethics and Environment pillars, the OECD Guidelines for Multinational Enterprises, the UN Global Compact's tenth principle (anti-corruption), and applicable Australian law.

2. Legal & Standards Framework

- Modern Slavery Act 2018 (Cth) — Australian Eatwell Pty Ltd conducts an annual Modern Slavery Statement addressing risks across own operations and supply chain; this Ethical Policy and the Human Rights Policy together form part of that response.
- Fair Work Act 2009 (Cth) and applicable state Work Health and Safety legislation (referenced, not restated — see Human Rights Policy).
- Australian Consumer Law (Competition and Consumer Act 2010, Cth), Schedule 2 — governs marketing and labelling claims.
- Food Standards Australia New Zealand (FSANZ) Code and state biosecurity legislation.
- Corporations Act 2001 (Cth), Part 9.4AAA — whistleblower protections; ASIC Regulatory Guide 270.
- Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).
- ISO 37001 (Anti-Bribery Management Systems) — used as our internal benchmark, not a certification claim unless independently certified.

3. Business Integrity

3.1 Anti-Bribery & Corruption

No employee, contractor, or agent may offer, give, solicit, or accept a bribe, kickback, or improper payment to obtain or retain business or an improper advantage, whether to a public official or a private party. Facilitation payments are prohibited, including where locally customary, unless required for imminent health or safety. All third-party agents and intermediaries operating in higher-corruption-risk sourcing regions are subject to enhanced due diligence.

3.2 Gifts, Hospitality & Conflicts of Interest

Gifts and hospitality must be modest, infrequent, and never conditional on a business decision; anything above [AUD $500] must be declared. Employees must disclose actual, potential, or perceived conflicts of interest (financial interests, family relationships with suppliers, outside directorships) to their manager or the Office Manager before the matter proceeds.

3.3 Fair Competition

We compete on the merits of our products and do not engage in price-fixing, market or customer allocation, bid-rigging, or the exchange of competitively sensitive information with competitors, consistent with the Competition and Consumer Act 2010.

3.4 Political Neutrality

Australian Eatwell Pty Ltd does not make political donations from corporate funds without prior Board approval and public disclosure in line with applicable electoral funding law.

4. Whistleblowing (Speak-Up Channel)

Reports of suspected fraud, corruption, bribery, breaches of law, accounting irregularities or other serious misconduct are raised and handled under the Company's Grievance and Whistleblowing Policy, which is the Company's single mechanism for both workplace grievances and whistleblowing reports. Under that policy these matters are treated as serious concerns.

Reports may be made in person, in writing or anonymously, in any language, to a supervisor, HR, the Managing Director, a worker representative, the confidential internal line info@australianeatwell.com.au, anonymous or the locked suggestion box. All reports are handled internally by the Company's own people; no external hotline or third-party service is used. The Managing Director leads the response, supported by management, and the reporter's identity is known only to the Managing Director and the investigator unless the reporter agrees otherwise. A report involving management goes directly to the Managing Director.

Reports are acknowledged within 2 working days and investigated by a person with no connection to the matter, normally within 15 working days, with a written outcome and a right of appeal. Reports are protected under Part 9.4AAA of the Corporations Act 2001 (Cth), and anyone may also report directly to a regulator such as ASIC or the ATO at any time without penalty. Victimisation of anyone who raises a concern is a serious disciplinary matter and may constitute a criminal offence.

5. Data Protection & Privacy

Personal information of employees, workers, customers, and suppliers is collected, used, and stored in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles, including data minimisation, purpose limitation, and breach notification obligations under the Notifiable Data Breaches scheme.

6. Product & Marketing Integrity

6.1 Labelling & Environmental Claims

Claims about our products (e.g. "sustainable," "carbon neutral," "regeneratively farmed," or comparative environmental claims versus animal-based products) must be substantiated with verifiable evidence before use, consistent with Australian Consumer Law s18 and current ACCC guidance on environmental and sustainability claims. Marketing content is reviewed prior to publication.

6.2 Food Safety & Traceability

Products comply with the FSANZ Food Standards Code. Ingredient traceability is maintained from feedstock supplier through to finished product to support rapid recall and to prevent food fraud (e.g. undisclosed protein substitution or origin misrepresentation).

6.3 Biosecurity

Feedstock sourcing and site operations comply with relevant state and federal biosecurity requirements to prevent the introduction or spread of plant pests and disease.

7. Environmental Responsibility (SMETA Environment Pillar)

7.1 Water Stewardship

Given regional Australia's exposure to drought and competing agricultural water demand, Australian Eatwell Pty Ltd monitors and reports site water use, prioritises efficiency improvements, and engages with local water authorities and growers on shared water-stress risk, particularly for feedstock grown in water-constrained catchments.

7.2 Energy & Emissions

We track energy use and greenhouse gas emissions (Scope 1 and 2 as a minimum) at manufacturing sites and set year-on-year reduction targets.

7.3 Waste & Packaging

We minimise production waste, pursue circular packaging solutions, and comply with state container deposit and packaging stewardship schemes.

7.4 Land Use & Biodiversity

Where we contract directly with growers, we favour sourcing practices that avoid land clearing of high-conservation-value land and support soil health and biodiversity outcomes.

8. Regional & Community Engagement

8.1 First Nations Engagement

Where operations, land-based sourcing, or site development may intersect with Country, we engage in good faith with Traditional Owners and Native Title holders, respect cultural heritage protection obligations under relevant state and federal legislation, and seek opportunities for genuine partnership rather than transactional consultation.

8.2 Local Employment & Economic Contribution

We prioritise local and regional employment and procurement where genuinely competitive, recognising our role as a significant regional employer.

8.3 Community Consultation

Material changes to site operations (expansion, water usage, emissions) are communicated to affected regional communities, with a channel for community members — not just employees — to raise concerns.

9. Supplier Business Conduct Requirements

Suppliers are required to acknowledge a Supplier Code of Conduct covering anti-bribery, fair competition, environmental compliance, and product integrity, in addition to the labour standards set out in the Human Rights Policy. Non-compliance is addressed through corrective action plans; serious or repeated breaches may result in contract termination.

10. Governance & Responsibility

The Managing Director has ultimate accountability for this policy and leads the response to whistleblowing reports under the Grievance and Whistleblowing Policy. The Office Manager owns implementation, keeps the Grievance and Whistleblowing Policy current, and prepares the annual Modern Slavery Statement; HR administers the reporting channels. Site supervisors are accountable for environmental and biosecurity compliance at their location. Procurement is accountable for embedding supplier conduct requirements into contracts.

11. Monitoring & Audit

Compliance is assessed through the SMETA Business Ethics and Environment pillar audits (where in scope), and an annual internal review by the Office Manager reported to the Managing Director, including a review of whistleblowing reports logged in the Concerns Register under the Grievance and Whistleblowing Policy.

12. Review

This policy is reviewed at least annually by the Office manager and approved by the Managing Director, and earlier if triggered by regulatory change (e.g. amendments to the Modern Slavery Act reporting thresholds) or a significant incident.

13. Policy Summary

Bottom line: this policy keeps business ethics, environmental stewardship and community relationships distinct from labour standards — each governed by clear legal anchors rather than broad aspirational statements — and gives every pillar a named owner and a live reporting line to the Managing Director.

Area	What This Policy Establishes	See
Legal grounding	Anchored in the SMETA Business Ethics and Environment pillars, OECD Guidelines, UN Global Compact Principle 10, Modern Slavery Act 2018, Corporations Act Pt 9.4AAA, Privacy Act 1988, and ISO 37001 as an internal benchmark.	S2
Business integrity	No bribery, kickbacks or facilitation payments; gifts and hospitality declared above a threshold; conflicts of interest disclosed; no price-fixing or market allocation; political neutrality.	S3
Whistleblowing	A confidential Speak-Up channel for fraud, corruption and serious misconduct, run internally under the Grievance and Whistleblowing Policy, with anonymous reporting, identity protection, and victimisation treated as a serious, potentially criminal matter.	S4
Data protection	Personal information of employees, workers, customers and suppliers handled per the Privacy Act 1988 and APPs, including data minimisation and breach notification.	S5
Product & marketing integrity	Environmental and sustainability claims substantiated before use; full food safety and traceability; compliance with state and federal biosecurity requirements.	S6
Environmental responsibility	Water stewardship in drought-exposed regions, tracked energy/emissions with reduction targets, circular packaging and waste practices, and land use and biodiversity safeguards.	S7
Regional & community engagement	Good-faith engagement with Traditional Owners and Native Title holders, priority for local employment, and community consultation on material site changes.	S8
Supplier conduct	Tier 1 and higher-risk Tier 2 suppliers bound by a Supplier Code of Conduct covering anti-bribery, fair competition, environment and product integrity; non-compliance managed via corrective action or termination.	S9
Governance & oversight	Managing Director accountability, named ownership by the Office Manager, SMETA audits, annual internal review reported to the Managing Director, and at least annual policy review.	S10–12

Approved by: Nathan Harris Position: Managing Director Signature: Nathan Harris Date: 22.10.2026