

GROWER GROUP ALLIANCE INC.

THIRD PARTY CODE OF CONDUCT

Grower Group Alliance Inc (ABN 65 816 357 099) (**GGA**) is committed to maintaining the highest standards of integrity and professionalism across all levels of its operations and in all of its business dealings.

This Code applies to all Third Parties when engaging, undertaking activities, or providing products or services to, or with, GGA.

GGA requires a Third Party to read, understand and be familiar with this Code.

This Code is not a substitute for legal requirements, nor does it deal with every situation that may arise, rather its purpose is to outline the minimum standards of honest and ethical behaviour that GGA expects and requires from the Third Parties which GGA engages and/or does business with.

This Code will be used:

- to support a Third Party in fulfilling its role and responsibilities to GGA;
- as a guide for the public about the standard of conduct and behaviour that is expected from GGA and its engagement with Third Parties;
- when GGA is evaluating the conduct of, and/or ongoing engagement with, a Third Party.

For the purpose of this Code:

Personnel refers to a director, officer, employee, volunteer, contractor, agent or representative of an entity;

Third Party refers to an entity (including its Personnel) or individual engaged to work for or with, or to provide products or services to, GGA, and includes:

- (a) all members of GGA under GGA's constitution; and
- (b) partners or subcontractors engaged by GGA for the purpose of collaboration, investment, networking, project or service delivery.

Any questions about this Code should be directed to the GGA Board Secretary by telephone on 0432 988 694, email at Maddison.McNeil@gga.org.au or post address to GGA Board Secretary, Level 6, 1 Nash Street Perth WA 6000.

1. Comply with law, contractual obligations and this Code

1.1 A Third Party is expected to comply with:

- (a) this Code;
- (b) all laws applicable to their engagement with GGA; and
- (c) all obligations imposed on them by the contractual arrangement governing their engagement with GGA.

1.2 A Third Party should have robust governance structures, management controls and operational processes in place to ensure compliance.

- 1.3 To the extent any applicable law is more restrictive or onerous than this Code, the law will take precedence.

2. Not cause harm to GGA

- 2.1 GGA is proud of its reputation for innovation and collaboration. In all its operations, GGA is driven by its purpose and inspired by its vision.
- 2.2 A Third Party must not engage in activities that may reasonably be considered to cause harm to GGA's reputation.

3. Act with professionalism, integrity and accountability

- 3.1 GGA is committed to maintaining the highest standards of integrity and professionalism across all levels of its operations and in all of its business dealings. As such, GGA is committed to being accountable and transparent in its business activities.
- 3.2 A Third Party is expected to behave with honesty, integrity, and professionalism in conducting all activities associated with its engagement with GGA. This includes:
- (a) having processes in place to promote high standards of good governance, personal integrity, honesty and professional conduct;
 - (b) exercising good judgment, considered decision-making and undertaking activities with the intention of being a good corporate citizen;
 - (c) applying the principles of risk minimisation and risk management in practice;
 - (d) ensuring relevant information is recorded and documented accurately and maintained in accordance with good record keeping practices and appropriate security measures;
 - (e) being accountable to GGA, transparent in its reporting to GGA (as required) and engaging in open communication with GGA in respect to the purpose and performance of its engagement.

4. Prevent bribery, corruption and fraud

- 4.1 GGA is committed to ensuring robust governance structures and processes are in place to prevent all forms of corruption, bribery or fraud.
- 4.2 When engaging with GGA, a Third Party must not participate in:
- (a) bribery or corruption;
 - (b) inappropriate procurement or disclosure of inside information regardless of whether the information was obtained in the course of working for or with GGA; or
 - (c) deceptive, unethical or fraudulent practices including but not limited to intentional misrepresentation to secure a benefit or misappropriation of any property of GGA (including any of its employees, suppliers or customers).

5. Avoid or manage conflicts of interest

- 5.1 GGA is committed to identifying and addressing situations that could cast doubt on GGA's ability to act with objectivity when providing services or in connection with GGA's business.

- 5.2 A Third Party is expected to take all reasonable steps to avoid any actual, potential or perceived conflict of interest that may compromise its ability to carry out its engagement with GGA (**conflict of interest**), and when it becomes aware of a conflict of interest, it must promptly disclose it to GGA and take appropriate steps to mitigate or resolve it.

6. Provide a safe work environment

- 6.1 GGA is committed to the health and safety of its personnel, workers and visitors.
- 6.2 When engaging with GGA, its personnel or attending GGA's premises, a Third Party must take reasonable care to ensure its conduct does not adversely affect any other person's health and safety. This includes taking reasonable steps to gain an understanding of the hazards and risks associated with its operations involving GGA, and notify GGA of any risks and complying with work health and safety laws and industry standards.
- 6.3 A Third Party is responsible for providing a safe work environment for its Personnel as required by law.

7. Treat individuals fairly and respectfully

- 7.1 As a member-based organisation it is important to GGA that a culture of inclusiveness, fairness, and respect for all is fostered.
- 7.2 A Third Party is expected to ensure all individuals are treated in a manner that is respectful, fair and reasonable. This includes fostering a working environment which is free from discrimination, harassment and exploitation.

8. Be environmentally responsible

- 8.1 GGA is committed to doing business in an environmentally responsible and sustainable manner.
- 8.2 A Third Party is expected to carry out its activities with GGA in an environmentally responsible and sustainable manner and take reasonable steps to minimise any adverse environmental impact.

9. Ensure proper use of GGA's Assets

Assets means property of any form which GGA owns or is authorised to use;

Confidential Information means all non-public information about GGA, its business or activities.

- 9.1 GGA is committed to dealing with its Assets in a proper and financially responsible manner.
- 9.2 A Third Party must only access and/or use Assets with GGA's authorisation, and such use/access must be:
- (a) in accordance with any directions given by GGA or as required by law;
 - (b) for a legitimate and proper purpose (and not for any unlawful purpose or unauthorised personal benefit); and
 - (c) in a way that is accounted for and reasonable.
- 9.3 Any transaction involving Assets, undertaken by a Third Party on GGA's behalf, must be authorised by GGA's authorised representative in writing;

9.4 A Third Party must take all reasonable steps to maintain the confidentiality of Confidential Information entrusted to it, and only use it for a proper purpose, unless disclosure is expressly authorised or legally required. The obligation to maintain the confidentiality of Confidential Information remains even after the Third Party ceases to be engaged with GGA.

9.5 A Third Party must seek the approval from GGA before sharing information about GGA with the media or the general public.

10. Protect Personal Information

10.1 **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and

(b) whether the information or opinion is recorded in a material form or not.

10.2 GGA is governed by the *Privacy Act 1988* (Cth) and a Third Party is expected to handle any Personal Information received from GGA or relating to its engagement with GGA in a manner that complies with the *Privacy Act 1988* (Cth), whether or not it is otherwise governed by the Act.

Breaches of this Code

Any person, including a Third Party, may report any concerns about compliance with this Code to GGA's Board Secretary. Where it is inappropriate to raise a concern with the Board Secretary, a person may contact GGA's chief executive officer. A report may be made anonymously.

GGA may take all action necessary to investigate any alleged or actual breach of this Code, including as required by law.

Review and changes to this Code

GGA may amend this Code and will provide notice of any updates.

Version history

Version	Effective	Renewal date	Owner	Approved by
1.0	April 2025	April 2026	Rikki Foss	GGA Board