



Code of Conduct

GrainCorp Limited

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GrainCorp

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Policy Information

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1	13 May 2026	GrainCorp Board	Approved the inclusion of material changes

About GrainCorp

GrainCorp's vision is to lead sustainable and innovative agriculture through another century of growth.

Our purpose is to proudly connect with customers and rural communities to deliver value through innovation and expertise.

The GrainCorp Group of companies includes GrainCorp Limited and its various subsidiaries in Australia and around the world (**GrainCorp** or the **Company** or together, the **Group**).

We care about both achieving results and how those results are achieved. GrainCorp's values help define our Company's culture by providing a common understanding of how we do things and how we should behave towards each other, our customers and other stakeholders.

Everyone at GrainCorp is responsible for professional and ethical business conduct and is accountable for ensuring their decisions and actions are consistent with our values and are in the best interest of the Company.

Our values

Our values guide how we work and treat others.



We care

We treat everyone with respect and make thoughtful, responsible decisions.



We deliver

We stay accountable and act with integrity in our work.



We stay safe

We foster an inclusive environment where everyone feels respected.



We do what's right

This value sits at the core of our Code and guides us to act ethically in every situation.

1 Understanding our Code of Conduct (Code)

Introduction

GrainCorp's Code is founded on a set of values which are essential for managing our organisation. Our values define how we should behave toward each other, our customers, other relevant stakeholders, the community and our environment.

The Code requires that we comply with all laws applicable to our operations. However, the standard we expect of our people goes beyond the legal minimum requirements. We require all our employees, Directors and contractors to demonstrate a high level of personal and professional ethical conduct in the workplace and when carrying out duties for GrainCorp at all times.

We must all uphold and promote our values by complying with the Code and all laws applicable to our operations. We must act at all times with honesty, fairness and high standards of personal integrity, in everything that we do.

The Code is not intended to be read as a set of rules, but rather to provide guidance for ethical decision making and a framework for resolving challenges as they arise. The **Code of Conduct Handbook** (available on Jumbunna) provides our employees with further practical guidance on how to live our values in every decision we make at work.

Who must follow the Code?

Everyone who works for, acts for, or in some way represents our Company anywhere in the world is required to comply with the Code. This includes Directors, employees, contractors, consultants, employees of a labour hire company and any relevant third parties, whether they work full-time, part-time or as casual/supplementary workers. We use the term 'you' to refer to all persons who must comply with the Code. When you work with us, you agree to promote, honour and comply with the Code and values. Suppliers and other visitors to our sites should also be provided with a copy of the Code, as we expect that they will also honour our commitment to ethical business conduct.

What does the Code cover, and how does the Code interact with other GrainCorp policies and procedures?

The Code seeks to ensure that the highest ethical standards and corporate behaviour are maintained across GrainCorp. The Code must be read and observed in conjunction with GrainCorp's policies and procedures which may apply globally or nationally to GrainCorp. Copies of these policies and procedures are available on the Company's website and Jumbunna (for internal policies and procedures).

How can the Code help me?

The Code governs what is expected of you, including acting with honesty, integrity and fairness at all times. The Code is designed to ensure we deliver on our commitment to corporate responsibility and sustainable business practices. The Code does not create specific rights for employees, customers or other stakeholders.

Responsibilities of those who lead others

If you are a supervisor or manager, you are a leader and you must ensure that you and the people for whom you are responsible, comply with the Code and uphold our values.

This includes:

- demonstrating behaviour that is consistent with our values, policies and procedures at all times
- fostering a culture of sound ethical conduct
- creating and maintaining a psychologically safe environment in which people feel comfortable speaking up and raising any concerns
- recognising and rewarding good behaviour, performance and achievements
- responding in a timely manner to the legitimate concerns and questions about the Code and the behaviours it promotes
- taking action to address behaviours inconsistent with the Code.

Consequences of breaching the Code

Breaches of the Code are not acceptable and will be taken very seriously. If you genuinely suspect the Code has been breached (including the 'spirit' of the Code), you should immediately report that information to your manager or Human Resources Business Partner (**HR BP**). If you require advice or would like to discuss any matters related to compliance with the Code, please contact your manager, HR BP or the Company Secretary.

There may be occasions where it is inappropriate to raise a concern with your manager or with Group Legal, in which case you may report information under the Company's **Group Whistleblower Policy**. The Board wants all employees to feel safe and supported in raising concerns under the Whistleblower Policy. See further information in the section titled 'Whistleblowing'.

Substantiated breaches of the Code may result in counselling or other disciplinary action (including termination of employment) being taken, depending on the results of those investigations.

2 Privacy

We recognise the importance of protecting your personal information, as well as that of our customers, suppliers and other stakeholders. Most countries in which we operate have privacy laws with which we must comply.

GrainCorp's Privacy Policy and Procedure outline the requirements which are to be adhered to in relation to personal information. Some of the key requirements are:

- You must ensure that you respect and fully protect confidential and private information that relates to GrainCorp and / or other workers
- You must not access private or confidential information unless you are required, and therefore authorised, to do so in the proper performance of your role
- You must never release information about our clients or other workers to third parties unless the person the information relates to has agreed or if we are required to release the information under the law
- You must follow procedures and requirements to protect information whenever you provide details over the phone or email
- You must follow all protocols and procedures relating to the maintenance of passwords and user profile setup. Never allow someone else to log on using your individual details
- You must collect, use, store, handle, update and destroy information, particularly personal information, in line with applicable policies and processes at all times.

We will only collect your personal information in a manner that is lawful and reasonable in the circumstances. We will not disclose your personal information to any third party for any purpose other than the purpose for which it was collected, unless we have your consent to do so, we are otherwise required to by law or at the direction of an authority. We are committed to ensuring that any personal information we hold is secure, and protected from misuse, loss, unauthorised access, modification or disclosure. We will take all reasonable steps to de-identify and destroy any personal information that is no longer required by us.

You and our stakeholders have the right to request access and correction to any personal information. If you are unclear or have any doubts about the handling of personal information, please contact the Privacy Officer. During your employment you must take all reasonable steps to ensure you comply with privacy laws as they apply in your jurisdiction.

A copy of the **Privacy Policy and Procedure** is available on GrainCorp's website.

3 Confidentiality

Everything you produce in the workplace that has the capacity to be stored in physical or electronic copy is our property. In your position, you may come across information or knowledge that is particularly sensitive or confidential. This may include our information (including cross business unit information such as strategies, financial reports, and customer lists etc.) or that of an end user, customer or competitor.

Failure to preserve the confidentiality of material information about the Company can have significant ramifications for us, which not only include loss of valuable information but also potential liability for breach of market disclosure laws. You should read and follow our **Continuous Disclosure and Financial Markets Communication Policy**, available on the GrainCorp website.

It is imperative that you do not share any of our information with any person who is not authorised to receive it. You must also protect the information of third parties that comes into your possession from being released to other persons or used in any manner which is inconsistent with the purpose for which it has been made known to you. This requirement applies separately to any obligation you have under contract or a Company policy dealing with this subject matter in your jurisdiction, and even after you have left our employment; in which case, you must return to us all information which you may have in your possession.

If you have any concerns over confidentiality, please contact your manager or a representative of Group Legal.

4 Whistleblowing

The **Group Whistleblower Policy** aims to ensure all employees to feel safe and supported in raising concerns about suspected or actual misconduct at GrainCorp.

Our Whistleblower Policy sets out how you can confidentially disclose or report information (including information involving suspected breaches of the Code), who you can speak to about these matters, how to contact them, how such matters can be handled and the various protections that you are entitled to under the Whistleblower Policy and under the law.

Workers who report a concern in good faith in accordance with the Whistleblower Policy must not be personally disadvantaged, victimised or otherwise caused detriment in their engagement because of the report. GrainCorp will not tolerate anyone being discouraged from submitting a report or being subject to detriment because they want to submit a report or they have done so.

As set out in the Whistleblower Policy, where you feel that you cannot report a complaint internally (such as to your manager or with Group Legal), you are welcome to contact the FairCall hotline. The FairCall hotline is operated by KPMG and is completely independent of GrainCorp. When you contact FairCall, your report will be recorded by a KPMG employee who is trained in handling whistleblower concerns. Reports to the whistleblower hotline can be made anonymously. Please be aware that if you choose to remain anonymous, we will not be able to contact you to seek further information or provide any updates regarding the status or outcome of your report. You can contact FairCall via one of the methods detailed in the Whistleblower Policy.

A copy of the **Group Whistleblower Policy** is available on GrainCorp's website.

5 Commitment to Health, Safety and Environment

Your safety, health and wellbeing are extremely important to us and we are committed to a culture of zero harm. We also recognise that sound environmental management practices are important to the long-term stability and growth of our business and to the wellbeing of the various communities in which we operate. We are committed to developing business systems and processes that minimise or limit our impact on the environment. We will continue to seek alternatives to hazardous methods, substances or products to enhance our protection of the environment and our personal safety.

We will comply with applicable environmental and workplace health and safety laws in all jurisdictions in which we operate. In addition, we have a series of mandatory standards and procedures with which you are required to comply. Non-compliance with these environmental and workplace health and safety laws and/or our safety, health and environmental standards and procedures is unacceptable and may result in disciplinary action.

If you see an unsafe act or become aware of an unsafe work practice, you should advise the person/s performing such unsafe practices to immediately cease these activities and you must report the incident to your immediate manager or HSE representative (or if that is inappropriate please contact one of the contacts detailed in the previous section) to avoid any potential harm to yourself and others. If you require advice or would like to

discuss any matter related to safety, health or the environment, please contact one of our HSE representatives.

If a visitor seeks entry to any of our sites, then they must be inducted in accordance with relevant site practices, their details and attendance recorded and they must be provided with identification and safety vests, masks, goggles or helmets as may be appropriate in terms of the site they are visiting. If the purpose of the visit is a regulatory inspection, investigation or raid, then you must ask the visitor for copies of entry permits and provide these to Group Legal, your site manager, HSE representative and your General Manager immediately, who will offer assistance and advice before access is granted.

We consider climate change to be a significant challenge for the global community. While our overall impact may be small in comparison to some of our peers, we believe that climate change can be managed through active participation in the planning and mitigation process.

6 Travelling

You may be required at various times to travel in connection with your employment. Sometimes this may be to and from work, and other times this may involve local, interstate or international travel by sea, road, rail or air (or a combination of same). You must ensure all travel bookings are arranged in an honest and feasible manner, compliant at all times with any local standards, cost limitations, procedures and policies that apply to your business unit. If you are unsure what these are, please contact your immediate manager.

Even while away from your regular place of work, you must abide by the Code, and act in a professional and responsible manner, abiding by all laws and travel policies and procedures applicable to your activities in your jurisdiction.

Any equipment or vehicles hired should be treated with care, you must ensure you are licensed and physically capable to drive any vehicle in the location in which you are travelling, and all business expenses must be documented and claimed on an honest and legitimate basis and in accordance with all applicable policies and procedures.

7 Drugs & Alcohol

Drug and alcohol use can adversely affect your judgement and performance and create hazardous situations which pose a health and safety risk to both you and your workmates.

We have strict policies and procedures around the use of drugs and alcohol in the workplace. You must also respect all restrictions applying to smoking cigarettes or vapes.

At no time can you present for work affected by, or under the influence of, or impaired by alcohol or drugs at any site. Failure to comply with this requirement is a cause for disciplinary action in accordance with our **Drug and Alcohol Management Policy and Procedures** (available on Jumbunna).

Where you have attended a work-related function and consumed alcohol you must not return to any work site, and you are responsible for ensuring you stay within the prescribed legal limit if intending to drive, and you must comply with any lawful instructions we may give you in that regard.

For your safety and that of others, we may conduct random drug and alcohol testing in the workplace where this is legally permissible.

8 Laws & Regulations

In all jurisdictions in which we operate there are laws, codes, standards and regulations that govern our work practices, business transactions and the manner in which we conduct ourselves in most daily interactions. These range from driving, conduct and behaviour towards other people, dealing with confidential and private

information, recording of results, stocks weights and the condition of buildings, fumigation and pesticide applications, taking care of our own safety and that of those around us, the release of toxins or other substances into the environment and in our waterways, to name a few. You must be aware of the laws, codes, standards and regulations which govern our work practices and ensure that you do not engage in offending conduct as this could lead to reputational damage (for GrainCorp and for you personally) and could jeopardise your employment, not to mention result in fines, penalties, convictions or regulatory investigations.

9 Fraud

You must not engage in acts of fraud and other unethical or corrupt practices against our business, customers, suppliers, contractors and employees. Such acts and practices may be illegal, as well as a breach of the Code. We are committed to identifying, reporting and investigating any such incidents. Our overall aim however is to prevent fraudulent, unethical or corrupt practices from occurring. To do this we may initiate various strategies, such as training and awareness, audits, risk mitigation assessments, culture enhancement and assigning individual accountability, and you must cooperate with, and participate in, such initiations and programs.

10 Conflicts of Interest

A conflict of interest refers to situations in which personal, occupational or financial considerations may affect, or appear to affect, your objectivity, judgement or ability to act in the best interests GrainCorp when carrying out your duties as a worker.

At all times, you must act honestly and with integrity, and not put yourself in a situation that places, or appears to place, your own personal, occupational or financial interests before those of GrainCorp.

You must avoid outside interests or activities that could be in conflict with our business. At all times, you must ensure that there is no actual or perceived conflict between your personal interests and the performance of your work duties. Such conflicts may damage our reputation with our suppliers, customers and other stakeholders, and/or impair your judgment. You must not use your position, your knowledge, our assets or our influence for your own personal advantage or that of others.

Close Personal Relationships

Conflicts of interest can arise due to a close personal relationships with another worker. Most personal relationships that develop between employees are generally a private matter. However, if you have the responsibility for or authority to affect the careers or employment of other employees, you should perform your role free from any conflict of interest arising from a personal relationship (e.g. a family, business or personal relationship).

If you have a personal relationship with another employee that could put you in a potential conflict of interest situation or could be perceived to involve a power imbalance, this should be disclosed. All disclosures of personal relationships will be treated confidentially.

You must declare family relationships where the Company may be considering employing a person to work with you, report to you or whom you may report to.

If you are an employee, you must identify and fully disclose in writing any actual or perceived conflicts to your manager and to the Company Secretary, who will enter the information in a register. For example, if a member of your family or your spouse / partner is employed by a GrainCorp related company or contracted to provide services to GrainCorp for a fee, then you should disclose this to your manager in writing. The manager must then ensure the Company Secretary has received this notification.

Outside Opportunities

We generally support the involvement of our employees in outside opportunities, including community activities and professional organisations. However, if you undertake any outside employment, directorship or business activity, this must not conflict with your ability to properly perform your role with the Company or create a conflict

(or the appearance of a conflict) of interest with your duties to the Company.

You must also be careful not to take advantage of property, information or other opportunities arising from your position with the Company (e.g. if you learn of a business opportunity through your position).

Before undertaking outside business activities or accepting outside employment or directorship of another company or non-profit organisation, you must carefully evaluate whether the position could cause, or appear to cause, a conflict of interest. You must also obtain prior written consent from the Company Secretary where the proposed employment or position relates to an outside organisation that has or may have a business relationship with the Group or competes with services provided by the Group.

If you are the CEO or a Director (other than the Chair of the Board), you should report the matter to the Chair of the Board. If you are the Chair of the Board, you should report the matter to the Chair of the Audit and Risk Committee.

If you are concerned about your own situation, please discuss the matter with your manager or the Company Secretary.

11 Managing conflicts of interest

Reports of potential or actual conflicts of interest or close personal relationships should be provided to the Company Secretary (either directly or as passed from your manager, the Chair of the Board or the Chair of the Audit and Risk Committee as appropriate).

Where appropriate, the Company Secretary (in consultation with the Chair of the Board or the Chair of the Audit and Risk Committee as required) will consider if any further action should be taken to address the particular circumstances. If, in the opinion of GrainCorp, the conflict of interest or close personal relationship could be likely to give rise to difficulties including:

- unfair treatment or bias;
 - inappropriate workplace behaviour (including discrimination, sexual harassment, bullying or victimisation); and/ or
 - any other adverse impact, including on GrainCorp, its reputation, business operations or employees,
- then, if necessary, the Company Secretary may act to resolve any such issues or concerns.

Any changes will be made in consultation with the relevant parties and taking into account business requirements.

12 Related Party Transactions

A related party transaction arises when our Company enters into a direct financial transaction with an employee or Director (or an employee or Director's spouse, child or other relative) to provide or obtain goods or services. We encourage our employees and Directors to conduct business with us, as they often engage in enterprises that could deliver mutual benefits. However, we recognise that such transactions (or any transactions with their relatives) may give rise to a conflict of interest, which could affect the impartiality, independence and objectivity of an employee or Director. We therefore require all parties subject to the Code, to seek requisite approval from the Company Secretary for all intended or actual related party transactions, and where approved, to ensure that such transactions are conducted on an "arm's length" basis on terms no more favourable than available to non-related parties. If you require further information, please contact the Company Secretary.

13 Share Trading

We encourage all employees and Directors to invest in our organisation. We value our shareholders and aim to deliver long-term growth and sustainable returns. However, being a shareholder comes with certain responsibilities. In your position you may hold or come across information that is confidential and/or price

sensitive, and which is not public knowledge.

Trading in our shares when you hold this information may be considered insider trading, which is a criminal act in Australia and in most other countries around the world. Inside information is considered to be information that is not generally known or publicly available, or if it was available, a reasonable person would expect the information to have a material effect on our share price.

The Company's Share Trading Policy includes obligations that are intended to protect you from breaching the insider trading laws. For some employees, there are also additional restrictions that apply (such as approval requirements for buying and selling shares in the Company). You should read and follow the Share Trading Policy.

A copy of the **Share Trading Policy** is available on GrainCorp's website.

14 Corruption, Bribery & Business Ethics

We strive to meet the highest ethical standards in our business dealings and will only engage in fair and vigorous competition. Customers and suppliers will be treated in a fair, open and honest manner at all times.

As part of our commitment to acting ethically and with integrity, we have zero tolerance for bribery and corruption. We have an Anti-Bribery and Corruption Policy, which is aimed at countering bribery and corruption.

You must not pay, offer, promise or accept, directly or indirectly, any bribe, kickback, secret commission, facilitation payment, or other form of improper payment (however small), or otherwise breach relevant anti-corruption laws.

The **Anti-Bribery and Corruption Policy** contains more detail and is available on GrainCorp's website.

15 Gifts & Hospitality

We all must ensure that the relationships we have with our customers, suppliers and other stakeholders including governmental departments, public officials and state-owned corporations are legal and in every way transparent, and that business decisions are made impartially and fairly and not on the basis of gifts or hospitality offered or received. It is important that you exercise care when accepting or offering gifts or hospitality, in order to protect the Company's and your reputation and to avoid any suggestion of bribery or other corrupt acts.

You must not accept any gifts or hospitality, where the receipt or expectation of receipt which might in any way tend to influence, or appear to influence you in the performance of your duties. Likewise, you should avoid all situations in which the appearance may be created that any person or body, through the provision of hospitality or benefits of any kind is securing, or attempting to secure or influence, your favour. You should also take all reasonable steps to ensure that family members are not the recipients of benefits that could give the appearance of an indirect attempt to influence you or secure your favour.

The **Gifts and Hospitality Policy** contains more detail and is available on Jumbunna.

We acknowledge that modest, reasonable and appropriate gift giving is a custom in many of the countries in which we deal or operate. If you have any concerns or questions regarding gifts or hospitality, please contact the General Manager, Risk & Assurance.

16 Competition and Anti-Trust

We will adhere to and apply the spirit of anti-trust and competition laws wherever we conduct business. Most countries in which we operate have anti-trust and competition laws that restrict certain types of trade and

prohibit some activities which could be considered to impede free and fair competition.

Failure to comply with anti-trust, competition laws and prescribed codes of conduct is a serious offence and may bring with it criminal or civil liabilities toward us or you individually, including significant fines and/or jail sentences. You must not engage in any restrictive or anti-competitive trade practices or conduct that results in discussions, understandings or agreements with competitors to fix prices, misuse market power, allocate territories or customers, boycott customers, or any conduct that may be false, misleading or deceptive.

Compliance with competition and anti-trust laws is complex and differs from country to country. You are encouraged to seek advice from Group Legal should you have any concerns regarding trade, anti-trust and competition matters.

17 Authorities and Financial Delegations

GrainCorp has authority and financial delegations, approved by the Board of Directors, which governs who may approve certain activities and expenditure on behalf of GrainCorp (for example all purchase orders, entering into contracts, purchasing or disposal of equipment or property, legal settlements or compromises).

You must not act in any way contrary to the authority and financial delegations as approved by the Board, or execute any documents as an officer or director of any GrainCorp company unless that approval has been issued to you by the Board of Directors or by delegation of your manager, and then, only as set out in the GrainCorp Delegation of Authority Policy.

A copy of the **Delegation of Authority Policy** can be found on Jumbunna. If you are unsure, please contact your manager or any member of Finance for assistance.

18 Company Property & Asset Control

We will ensure that you have the necessary tools and materials to do your job. All of the property and assets which you will be granted access to are ours, and you must ensure that you protect and care for them and only use them efficiently, economically as authorised and for their proper purpose. Such assets include plant and equipment, intellectual property (Company information), motor vehicles, stock (including damaged or disposed stock), computers and peripherals, and all similar and related assets. You must not engage in theft, misuse or misappropriation of any Company property or assets. Such actions are absolutely inconsistent with our values.

In limited circumstances you may be able to use our assets for personal use, with the appropriate authority. You must seek permission from your immediate manager before removing our assets from a workplace.

At some workplaces we utilise surveillance measures such as closed-circuit television (CCTV) cameras to monitor security. You should be aware that your individual workplace may have a CCTV system, which could be operational at all times. As we respect your privacy, surveillance is not placed in bathrooms or private areas, only in areas of high traffic or sensitivity.

From time to time we may elect to install additional surveillance measures; especially if there have been instances of suspected or actual non-compliance with the Code, the law or safety breaches.

If you have any concerns about the use of Company assets or surveillance, please contact your manager or HR BP.

19 Document Retention

Every document you produce in connection with your employment, or during work hours, or with Company property is our property. From time to time, we may be required to locate and retrieve documents with short notice for the purposes of litigation, discovery, subpoena, investigation or audit. Therefore, it is imperative that necessary documents are retained, while unnecessary/duplicated records are disposed of in a systematic manner. You are responsible for controlling and managing the documents you produce, in an efficient and practical manner including ensuring your files, mobile data transmission equipment, papers, phones and all other forms of communication are appropriately secured, locked and password protected.

20 Harassment and Offensive Behaviour

GrainCorp promotes a 'zero tolerance' approach against violence in the workplace, unlawful discrimination, sexual harassment, bullying, vilification and victimisation in the workplace. You must treat fellow staff members with respect at all times and not engage in any behaviours that are illegal, offensive or inconsistent with our values, such as any form of harassment, physical coercion, intimidation or victimisation. If you engage in this type of behaviour you have breached the Code and our values and will be subject to appropriate disciplinary action, from counselling you on your work performance or behaviours, up to, and including, termination of employment.

You are solely responsible for your actions and behaviours, and at all times, must demonstrate consistency with our values and comply with any national or global policy dealing with equity and diversity and preventing harassment in the workplace. This means you must not bully, harass, sexually harass, victimise or unlawfully discriminate against any other person at work, including staff members, workers, Directors, contractors, suppliers or visitors.

If you wish to raise any concerns about harassment, inequities or any offensive behaviour in the workplace, please contact your manager, your Human Resources Business Partner, or submit a report via the FairCall Whistleblower reporting lines. Please refer to the relevant section of the Code on this topic or the separate Whistleblower Policy which can be found on the GrainCorp website.

21 Equality and Diversity in Employment

We believe in workplace diversity and are proud of being an Equal Employment Opportunity employer. A diverse working population brings with it cultures and ideas that can benefit and strengthen our workforce. We aspire to be a workplace that embraces minority groups and ensures that you and your fellow employees are treated equally, with respect, dignity and courtesy at all times.

We oppose any form of unlawful discrimination, which may include but is not limited to discrimination on the basis of race, age, gender, sexual preference, religious or political beliefs, disability and impairment or marital status. Employment, promotion, and reward decisions must be based on merit.

22 Human Rights

Respect for human rights is fundamental to our values and its long-term stability and growth of our business and to the wellbeing of the various communities in which we operate.

Slavery, servitude, human trafficking and forced labour (Modern Slavery) represent grave human rights abuses. GrainCorp's approach is one of zero tolerance. GrainCorp is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within the business or our supply chain.

23 Media, Communications & Continuous Disclosure

As a publicly listed company on the Australian Securities Exchange (ASX), we are committed to ensuring that our shareholders and the market are provided with timely and balanced disclosure of all relevant matters. At all times we will comply with the continuous disclosure obligations as required by the ASX Listing Rules and Australia's Corporations Act.

Disclosure to the market or communication with the media may only be authorised by the Board or the Managing Director & CEO. At no time should you address or answer questions of the media. All media queries must be directed to our Head of Corporate Affairs.

Please refer to the **Continuous Disclosure and Financial Markets Communication Policy** (available on the GrainCorp website) and / or the **Media Policy** (available on Jumbunna). If you have any queries about media or external communications, please contact the Head of Corporate Affairs or Company Secretary.

24 Social Media

At GrainCorp, we value the importance of using social media to connect with our employees, our customers and our stakeholders. It is important that whenever you use or access social media, that you understand your obligations as far as these relate to GrainCorp or our people.

Unless expressly authorised by the Company (and then only to that extent), you must not state or suggest in any use of any social media, that you represent any GrainCorp company, officer or director. You must ensure that any information you refer to is completely accurate and above all, we expect you to conduct yourself with respect for others – our customers, your colleagues, management and in regard to our operations and business affairs.

You must show respect to the confidential, internal and commercial affairs of our colleagues, our customers, our communications and our business. You must therefore comply with all confidentiality requirements and protect all commercial information or private details of anyone connected with GrainCorp. These requirements do not apply to any employees' personal use of social media platforms where the employee makes no reference to GrainCorp related issues or persons.

You are personally responsible for any content you post online which could give rise to legitimate complaints and legal actions. Your conduct online must not adversely reflect on, or cause harm or detriment to, GrainCorp, your colleagues or yourself.

Please refer to the **Social Media Policy & Guidelines** on Jumbunna for further detail. These obligations closely operate in conjunction with the provisions in the Code dealing with Harassment and Offensive Behaviour and Acceptable Use of Technology.

25 Acceptable Use of Technology

Your use of technology resources (including but not limited to computers, laptops, mobile devices, software, networks, email, internet, social media, cloud-based services, and artificial intelligence and machine learning) must be in accordance with the **Acceptable Use of Technology & Access Control Standard** (available on Jumbunna).

You must not use your GrainCorp provided email account, our systems, programs or intranet or internet access to engage in unethical, illegal or offensive conduct or work practices, or to conduct any business or activity other than in connection with your direct employment at GrainCorp. This includes chain emails and downloads which could cause the integrity of our systems to be corrupted or affected by computer viruses.

You must treat all Company property with care, keep it secure and only use it in connection with your employment. You must not access internet sites, email or other links which we consider to be offensive or contain inappropriate, sexually explicit, illegal or unethical content. Such activity is contrary to the Code and our company

policies and will not be tolerated. Disseminating any such material or links to same will result in disciplinary action being taken against you.

If you receive or are aware of such activities in the workplace, then you must report these activities to your manager or to a member of Group Legal.

At any given time, your access to and use of any GrainCorp IT or other system, equipment, the intranet or the internet may be monitored (continuously and on an ongoing basis), recorded and suspended or revoked without notice to you.

26 Political Support and Engagement with Governments

We respect your civil rights and political views, and the privacy to which you are entitled. We also acknowledge that our organisation's operations are subject to and affected by government intervention; therefore, we endeavour to build strong relationships with government agencies around the world.

At no time will we use GrainCorp's funds, property, goods or services as a contribution to a political party or candidate, or for consideration or favourable treatment. Similarly, you must not use GrainCorp's funds, property, goods, Company-supplied clothing, labels, or services to support a political party or similar movement, with which you may be affiliated or imply that your particular political views are endorsed by GrainCorp. Such behaviours are considered a serious breach of the Code and may result in disciplinary action.

We may however, with the prior written approval of the Managing Director & CEO and the Chairman of the Board, pay legitimate fees for approved GrainCorp attendees to participate in or attend as observers, those legitimate political events which are assessed to be of relevance to our Company, industry or operations.

At all times it is imperative that all information and representations we give to governments are true and accurate.

27 Charitable Donations

Whilst personal donations are at the discretion of the individual, any donations to any cause or charity on behalf of GrainCorp must be approved by Group General Counsel and/or the Managing Director & CEO and in some instances the Board of Directors (subject to the limits set out in the Delegation of Authority Policy which can be found on Jumbunna). Charitable donations on behalf of GrainCorp must be for approved causes, to registered bodies and must not give rise to adverse reputational risks.

28 Community Engagement

We operate in many diverse communities around the world, and our engagement with these communities is critical to our long-term success.

It is important to us that the communities in which we reside recognise us as being ethical, responsible, valued and empathetic corporate citizens. It is through our actions that we build trust; and to retain that trust we must continuously demonstrate our commitment to our values. We seek to enrich the communities in which we live and work by providing our support in both good and more difficult times and to build positive community relationships through effective communication and consultation.

We have established a Community Fund which provides financial support to organisations and projects that contribute to the development of local communities in grain-growing regions. Rural and regional Australia has been our traditional home, and we believe in supporting its development to the benefit of everyone. Similarly, our expanded global footprint includes other communities and cultures which we must embrace.

You are encouraged to actively manage engagement with our communities. You should always recognise and demonstrate sensitivity when dealing with matters that might affect the communities in which we operate. If you

require advice or would like to discuss any matters related to community engagement, please contact the Community Engagement Manager.

Our employees are encouraged to participate in registered and legitimate volunteering activities and to that end, GrainCorp has developed a **Community Leave Policy**. Please refer to this policy, and the **Community Fund Policy** (both available on Jumbunna) for further detail regarding the operation of the Community Fund and community leave.

29 Review of the Code

GrainCorp may amend or replace the Code at any time in its absolute discretion. This Code of Conduct will be reviewed at least every 2 years by the People, Safety and Culture Committee. Any recommended changes must be approved by the Board.

The Company Secretary is authorised to make administrative and non-material amendments to the Code provided that any such amendments are notified to the Board or its delegated committee at or before its next meeting.

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