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APPLICABILITY TABLE



indicates the businesses, within the division, to which this document applies.

Australian Vinyls / ModWood



Kleenheat



WesCEF Support Services



Ammonia / Ammonium Nitrate



Sodium Cyanide



CSBP Fertilisers



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1. PURPOSE and SCOPE

The purpose of the Wesfarmers Chemicals, Energy & Fertilisers (WesCEF or the Division) Code of Conduct (the Code) is to set out the standards of behaviour expected of those employed by or working in or for WesCEF, which includes all the business units and departments in the Division.

This Code applies whenever you are at work or identified as a representative of WesCEF. In some circumstances, this will include times when you are outside of your workplace or working hours such as functions, meetings, conferences or forums.

2. RESPONSIBILITIES

2.1. EMPLOYEES

- Employees are expected to comply with this Code at all times when carrying out their work and should understand that any behaviour that is contrary to this Code may result in disciplinary action up to and including dismissal.
- Employees should refer any questions to their supervisor or manager. Alternatively, employees may also contact Human Resources to discuss the Code and its application.

2.2. MANAGERS AND SUPERVISORS

- Managers and supervisors are to monitor compliance of employees with this Code.

2.3. EXTERNAL PERSONNEL

- Contractors, consultants, agents and other intermediaries (External Personnel) are expected to know and observe WesCEF standards and should be aware of this Code and any of the policies mentioned in the Code.

3. INTRODUCTION

WesCEF is committed to making positive economic, social and environmental contributions to society, while complying with all applicable laws and regulations and acting in a manner that is consistent with the divisional values of integrity, working together, responsiveness and accountability. WesCEF can only achieve these objectives by setting clear standards which guide decision making and hold all employees accountable.

WesCEF has adopted this Code to provide a set of guiding principles which are to be observed by all employees of the Division. WesCEF will keep the Code under review to ensure that it continues to evolve and reflect stakeholder expectations.

All employees are expected, at all times, to act consistently with the fundamental principles set out in this Code.

This means that all WesCEF employees are expected to:

- Do their work diligently, act in good faith, and act in the best interests of the Division.
- Promote and protect the business, reputation and general interests of the Division, and promote the values of the Division.
- Comply with all applicable local, national and international laws.
- Respect and preserve confidentiality.
- Refrain from misusing any information, assets, systems or facilities of the Division, including email and internet facilities, and ensure that these facilities are not used to access or distribute illegal, offensive or otherwise inappropriate material, or for any other purpose which may damage the reputation of the Division.
- Value, promote and maintain professionalism.
- Avoid conflicts of interest with the Division, and advise the Division of any conflict or potential conflict of interest. Assist the Division in operating ethically, complying with the law and making positive economic, social and environmental contributions to the communities in which we operate. This includes activation of or participation in grievance resolution, as set out in the Division's Grievance Resolution Policy and the Grievance Resolution Procedure, which are available on the WesCEF Connect intranet site.
- Approach their work in ways that minimise environmental impacts and maximise workplace safety.
- Show fairness, courtesy, respect, consideration and sensitivity in all dealings within their workplace and with customers, suppliers and the public.
- Endorse and support diversity in the Division's employment practices, including the development of employees in accordance with the Division's Recruitment and Selection Policy and the Diversity and Equal Employment Opportunity Policy, which are available on the WesCEF Connect intranet site.
- Avoid any form of discrimination, bullying, harassment or other inappropriate workplace behaviour, take action to prevent or stop these behaviours if demonstrated by others, and report where appropriate.
- Comply with all applicable policies and procedures.
- Promote the WesCEF divisional values of integrity, working together, accountability and responsiveness in the performance of their duties.

4. WHERE CAN YOU GET A COPY OF THIS CODE?

A copy of this Code can be found on the [WesCEF Connect intranet site](#) and the [WesCEF Internet site](#). A copy of this Code will be provided to all new employees when they join WesCEF and will be discussed at WesCEF inductions. Contractors, consultants, agents and other intermediaries (External Personnel) are also expected to know and observe WesCEF standards and should be made aware of this Code when they are engaged to work with the Division. The latest copy of this Code or any of the policies mentioned in the Code can be obtained from a WesCEF representative.

5. ADHERENCE TO THIS CODE AND WHO YOU CAN SPEAK TO

Compliance with this Code is taken very seriously.

If any WesCEF employee breaches this Code, that employee may face disciplinary action, including termination of employment. If the situation involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

All WesCEF employees and External Personnel have a responsibility to report any breaches of this Code immediately and should also report conduct where they are unsure whether a breach of this Code has occurred as per section 5.1 below, headed "Reporting of breaches".

If anyone is in doubt about the Code or its application, they should immediately seek advice from their manager or WesCEF Human Resources.

5.1. REPORTING OF BREACHES – WHISTLEBLOWER PROTECTION

All reports of breach of this Code of Conduct will be acted upon and kept confidential. No one will be disadvantaged or prejudiced if he or she reports, in good faith, a suspected breach of a law, regulation or the Code.

The *Corporations Act 2001* also gives special protection to disclosures about Corporations Act breaches, as long as certain conditions are met.

WesCEF has appointed Protected Disclosure Officers who are responsible for investigating reported breaches. The Protected Disclosure Officers are the people holding the following positions:

- WesCEF Chief Financial Officer (CFO); and
- WesCEF General Manager Human Resources and Health, Safety & Environment

Further details, including in relation to how to make a report, and procedures around investigation and reporting, are set out in the *WesCEF Whistleblower Policy* available on the WesCEF Connect intranet and [internet sites](#).

6. WesCEF OBJECTIVE, STRATEGIES and VALUES

Our objective is to develop a portfolio of successful and innovative industrial businesses that deliver satisfactory shareholder returns and continually strengthen our reputation for the management of health, safety and environment.

WesCEF aims to achieve this objective through the following strategies:

- investing in our businesses' capacity to meet the needs of our customers;
- executing opportunities for growth in existing and new markets;
- fostering a culture that recognises people are central to our success; and
- focusing on sustainable operations for the benefit of team members, customers and communities in which we operate.

All WesCEF employees are expected, at all times, to act consistently with WesCEF values that guide the behaviour of all employees. These are:

- Integrity - we operate in an ethical, open and honest way;
- Working together – we cooperate, communicate openly, treat each other with respect, and ensure each other's safety;
- Responsiveness – we act and seize opportunities; and
- Accountability – we are responsible for our decisions, actions and achievements.

7. CODE OF CONDUCT PRINCIPLES

All employees and External Personnel of WesCEF are expected at all times to act consistently with the principles of this Code. These principles align to the WesCEF values of integrity, working together, responsiveness and accountability and are described in this Code under the following headings:

1. Honesty, integrity and fairness.
2. Responsibilities to shareholders and financial markets.
3. Compliance with laws, policies and procedures.
4. Confidential information, privacy and maintenance of business records.
5. Conflicts of interest.
6. Engaging external personnel.
7. Employment practices.
8. Use of WesCEF resources and information systems.
9. Environmental Sustainability.

7.1. HONESTY, INTEGRITY AND FAIRNESS

Honesty, integrity and fairness are integral to the way in which our businesses operate and should guide all decision making in order to maintain the trust of WesCEF customers, colleagues, community and shareholders.

Honesty and integrity also extends to reporting any suspicious or dishonest conduct.

At WesCEF, honesty, integrity and fairness are displayed by abiding by the following principles:

- Comply with and uphold all laws against bribery and related improper conduct in all jurisdictions where the Division operates.
- Do not use funds, property, information or information systems belonging to the Division for your personal benefit, or the benefit of unauthorised third parties.
- Accurately document all business dealings to reflect the true nature of the transaction. Expenditure must be reported accurately and in a timely manner.
- Do not offer, provide or accept gifts, gratuities or entertainment in circumstances which could be considered to give rise to undue influence. Gifts, gratuities or entertainment in excess of \$250 must be approved and recorded in accordance with the *Wesfarmers Anti-bribery Policy*.
- All discounts to customers and employees of the Division must be approved by a manager and be recorded on sales invoices, and may not be taken in the form of additional unrecorded goods, or goods of higher quality or value than those invoiced.
- Ensure that any engagement with public departments or other government officials on WesCEF's behalf is managed professionally and ethically.
- Do not make political donations at a business or divisional level (these must be authorised by the Wesfarmers Board).

Wesfarmers shareholders, customers and the communities in which we operate expect WesCEF and those who work for and represent the Division to act in a professional manner.

7.2. RESPONSIBILITIES TO SHAREHOLDERS AND FINANCIAL MARKETS

As a division of Wesfarmers, an important part of achieving WesCEF's objective of developing a portfolio of successful and innovative industrial businesses that deliver satisfactory shareholder returns and continually strengthen our reputation for the management of health, safety and environment, is to ensure that WesCEF complies with the *Wesfarmers Market Disclosure Policy*, *Wesfarmers Share Trading Policy*, Australian Accounting Standards, the Corporations Act and ASX Listing Rules obligations. These policies are available on the Wesfarmers extranet site and the WesCEF Connect intranet site.

7.2.1 Continuous disclosure

To enable Wesfarmers to comply with its disclosure obligations under the Corporations Act and ASX Listing Rules, a *Wesfarmers Market Disclosure Policy* has been developed to ensure that:

- Wesfarmers shareholders and the market are provided with full and timely information about Wesfarmers' activities;
- there is no selective or inadvertent disclosure of material price-sensitive information relating to Wesfarmers;
- stakeholders have equal access to information issued by Wesfarmers; and
- all disclosures are clear, concise and effective.

Persons identified as part of the Wesfarmers reporting system in the *Wesfarmers Market Disclosure Policy* are responsible for identifying and reporting potentially price sensitive issues in accordance with that Policy.

WesCEF employees must immediately report to their manager or the WesCEF Managing Director any price sensitive information relating to Wesfarmers, being information that may affect the price of Wesfarmers shares, or information material to the financial performance of the Group.

WesCEF employees must not make comments that may affect the price of Wesfarmers shares.

The *Wesfarmers Market Disclosure Policy*, , can be found on the Corporate Governance section of the Wesfarmers extranet site.

7.2.2 Insider Trading

Insider trading is illegal and is prohibited at all times.

WesCEF employees must never trade (or communicate to others who might consider trading) in the securities of Wesfarmers, or companies engaged in transactions with the Wesfarmers Group, where in our position we have obtained information which is not public and could materially affect the price of those securities. Such trading, dealing or communicating to others who might trade is known as 'insider trading' and is prohibited under the Corporations Act. Penalties for contravening insider trading laws include criminal prosecution and civil liability, such as an obligation to pay compensation to anyone who suffered a loss as a result of the insider trading.

WesCEF employees cannot avoid the prohibition on insider trading by arranging for a family member or friend to deal in Wesfarmers securities. WesCEF employees or their associates must not give "tips" concerning price sensitive information to others, including customers.

Similar insider trading prohibitions apply in other jurisdictions where the Wesfarmers Group operates.

Those employees who hold securities under Wesfarmers employee share or long-term incentive plans must also be aware of and comply with the rules of those plans when undertaking transactions in Wesfarmers securities.

If you are in doubt about whether you are free to deal in Wesfarmers securities, you should seek the advice of the WesCEF Managing Director or the Wesfarmers Company Secretary before trading or dealing.

The *Wesfarmers Share Trading Policy* can be found in the Wesfarmers Group Policy Manual, which is available on the Wesfarmers extranet site and provided at training for managers that require knowledge of insider trading.

7.2.3 Financial Reporting

Wesfarmers' accounting policies and procedures are governed by the Australian Accounting Standards. WesCEF must adhere to these standards and all other financial reporting requirements.

All employees engaged in WesCEF's financial reporting processes are required to exercise diligence and good faith in the preparation of financial information, ensuring that this information is accurate and timely, and that it presents a true and fair view of the performance and position of the Division.

7.3. COMPLIANCE WITH LAWS, POLICIES AND PROCEDURES

WesCEF is committed to operating in a manner consistent with the laws of the jurisdictions in which its businesses operate.

Each divisional business and all WesCEF employees and External Personnel (as defined in Section 2) must take their legal responsibilities very seriously and must be familiar and comply with the applicable:

- laws and regulations of the work locations; and
- policies and procedures of WesCEF.

7.3.1 Competition and Consumer Laws

As a division of Wesfarmers, WesCEF is committed to compliance with the *Competition and Consumer Act 2010* (CCA) in Australia, and equivalent legislation in other jurisdictions in which the Division operates.

The CCA has two main purposes:

- to promote and maintain fair and open competition in the marketplace; and
- to protect the position of consumers by requiring accurate information in the marketplace and fairness in business dealings where there is an inequality in bargaining power.

WesCEF respects consumers by providing accurate information, acting in a fair manner in all business dealings and trading independently of competitors. All WesCEF employees have an obligation to actively promote compliance with the CCA (and equivalent legislation in other jurisdictions, where applicable). Employees in management or marketing roles, and those who have responsibility for deciding how to deal with suppliers, customers or competitors are required to undertake regular training.

Any breach of the law can have serious consequences for WesCEF, Wesfarmers and for the individuals involved. If anyone identifies anything inconsistent between the laws and regulations applying where they work, and WesCEF and Wesfarmers policies and procedures, then they should meet whichever sets the higher standard of behaviour. If anyone is unsure whether a particular law, policy or procedure may apply, they should raise the matter with their supervisor or manager.

All WesCEF employees are required to comply with the WesCEF Competition and Consumer Act Compliance Policy and managers receive training regularly via Wesfarmers.

7.3.2 Anti-bribery and corruption

As a division of Wesfarmers, WesCEF is required to comply with the *Wesfarmers Anti-bribery Policy* that strictly prohibits its personnel from engaging in activities that constitute bribery, facilitation payments, secret commissions or money laundering. WesCEF is committed to adopting effective systems to counter bribery and related improper conduct and to monitoring and enforcing these systems.

WesCEF employees must comply with and uphold all laws against bribery and related conduct in all the jurisdictions where the Division operates. The requirements about how WesCEF employees and third parties (agents, contractors, intermediaries or business partners) acting on behalf of, or performing services for, the Division (Third Parties), must behave are set out in the *Wesfarmers Anti-bribery Policy* which is available on the WesCEF Connect intranet and internet sites.

The *Wesfarmers Anti-bribery Policy* requires, among other things, that:

- employees must not offer or accept cash or other incentives, inducements or rewards in any form. This restriction also applies to Third Parties. In particular, payments to win business or to influence a business decision in WesCEF's favour (such as bribes, 'kick-backs' and similar payments) are strictly prohibited;
- All gifts offered to or received by WesCEF personnel of value greater than \$250 must be declared and logged with the Chief Financial Officer. Gifts of significantly higher value shall be declined (*refer section 7.3.4 Gifts*).
- all business dealings must be accurately documented to reflect the true nature of the transaction; and
- employees must take all practical steps to ensure that Third Parties do not engage in conduct that would contravene the *Wesfarmers Anti-bribery Policy*, this Code or any laws. This includes, where required by the *Wesfarmers Anti-bribery Policy*, conducting of due diligence and completion of a due diligence report, agreement of standard contractual terms on anti-bribery, and ongoing oversight of the work of these Third Parties. Where it is deemed appropriate to complete a due diligence report, a copy of this report must be provided to the WesCEF CFO to enable central storage of these reports.

The payment or facilitation of bribes and other improper payments or benefits is not only a contravention of the *Wesfarmers Anti-bribery Policy* and this Code; it is also prohibited by anti-bribery laws that have application in Australia and in other countries including the United States, the United Kingdom and China. A breach of the *Wesfarmers Anti-bribery Policy* will be regarded as serious misconduct leading to disciplinary action which may include termination of employment. A breach may also be reported to appropriate external law enforcement or regulatory bodies if deemed

appropriate and could also expose an individual to criminal and civil liability that could result in imprisonment or the imposition of a significant financial penalty.

The WesCEF CFO is the designated executive responsible for monitoring and applying the *Wesfarmers Anti-bribery Policy* and the Wesfarmers anti-bribery and anti-corruption program for the purposes of the WesCEF division. All WesCEF personnel should be vigilant and report any breaches or suspicious activity to the WesCEF CFO or to the Wesfarmers Company Secretary.

Anyone who has any concerns which they wish to raise under the *Wesfarmers Anti-Bribery Policy* should approach the WesCEF Managing Director, WesCEF CFO or the Wesfarmers Company Secretary.

WesCEF's prohibition on bribery must be communicated to Third Parties at the outset of WesCEF's business relationship with them, and as appropriate during the course of their work for the Division.

7.3.3 Fraud Risk Management

WesCEF maintains zero tolerance towards fraud and corruption. Fraudulent or corrupt activity of any kind, including for the benefit of WesCEF is expressly forbidden. WesCEF is determined to ensure that fraud against the company and corruption within it, is minimised and that where it does occur, the fraud or corruption is rapidly detected, effectively investigated and appropriately dealt with, including prosecution where appropriate. WesCEF aims to minimise its losses and recover costs and goods where possible.

All employees and External Personnel have a responsibility to be aware of fraud risks relevant to their roles and responsibilities. The *WesCEF Fraud Risk Management Policy*, which is available on the WesCEF Connect intranet site, outlines the strategies and procedures in place to prevent, detect and investigate fraud and corruption within the division.

7.3.4 Gifts, Gratuities and Entertainment

WesCEF recognises that accepting or offering gifts, gratuities and entertainment of moderate value is in accordance with usual business practice. WesCEF, however, prohibits the offering or acceptance of gifts, gratuities and entertainment in circumstances which could be considered to give rise to undue influence.

Gifts, gratuities or entertainment may be accepted (or offered) only if they are of an incidental nature and should not exceed A\$250 (per employee including spouse or acquaintance as appropriate). Gifts, gratuities or entertainment in excess of this figure must be approved by the line manager of the employee offering or being offered the gift, gratuity or entertainment. If not approved, it must be returned (or not offered) without delay, with an explanation of the WesCEF policy on these matters. All items that are accepted or offered by WesCEF personnel that exceed \$250 should be recorded within the Divisional Gift Register that is administered by the WesCEF CFO.

Entertainment of customers and suppliers provided (or received) should not extend beyond a level reasonably required to maintain a professional business relationship. Travel and accommodation offered by a supplier may not be accepted unless it is unconditional and has been approved by the employee's line manager.

7.3.5 Relationship with politicians and government officers

All dealings between WesCEF employees or External Personnel and politicians and government officers which relate to the Division and its business activities must be conducted ethically and with the utmost professionalism, to avoid any perception of attempts to gain advantage.

It is WesCEF policy that gifts, gratuities and entertainment must not be offered to, or accepted from, public or government officials or their associates (including politicians or political parties), without the prior approval of the WesCEF CFO. Political donations may not be made.

7.4. CONFIDENTIAL INFORMATION, PRIVACY, AND MAINTENANCE OF BUSINESS RECORDS

Employees and External Personnel of WesCEF that are privy to, party to or have knowledge of confidential information concerning WesCEF, which may include technical, strategic or financial information, commercial arrangements or intellectual property, must not disclose such information or misuse such information to obtain a personal benefit or a benefit for another person. WesCEF employees and External Personnel must:

- use confidential information solely for purposes of their duties as employees of the Division;
- preserve the confidentiality of confidential information, and ensure that it is not disclosed, except on a need-to-know and confidential basis, to other employees of the Division, or other authorised recipients on a confidential basis; and
- not use or modify any confidential information for their own or a third party's interest or benefit.

Compliance with these obligations with respect to confidentiality and privacy, whether it be with respect to personal information, information about suppliers or confidential information concerning WesCEF, is required to be maintained by all WesCEF employees and External Personnel after they have left the employ of the Division or the employ of the Wesfarmers Group.

WesCEF is committed to maintaining the confidentiality and security of information our employees and External Personnel become aware of in our dealings with customers, suppliers and other third parties.

All WesCEF employees and External Personnel must ensure that information received in the course of their work remains secure. This includes not sharing private or confidential information with other employees, unless they need it to perform their work at WesCEF. Confidential information should not be shared with those outside the Division, unless authorised or required by law.

WesCEF is committed to complying with government legislation governing privacy of personal information obtained by its businesses, and protecting and safeguarding the privacy of people who deal with the Division. All personal information that is collected must strictly be used, stored, handled and updated in line with the *Privacy Act 1988* and business unit Privacy Policies or Privacy Statements, which are available on the business unit internet sites.

We must ensure that we accurately and rigorously maintain all records relating to WesCEF's business and its operations in accordance with the *Wesfarmers Document Retention and Storage Policy* which is available on the WesCEF Connect intranet site and the [Wesfarmers extranet site](#).

7.5. CONFLICTS OF INTEREST

The personal interests of WesCEF employees and External Personnel should not conflict with any duties or obligations to WesCEF. This also extends to interests which a reasonable person would perceive as involving a conflict.

A conflict of interest may arise if a WesCEF employee or External Personnel has a direct or indirect (through a family member, friend or associate) financial interest in a business that has commercial arrangements with WesCEF.

A conflict of interest may arise where you are in a personal relationship with:

- a direct report or other employee where your relationship could create a conflict or perceived conflict with your employment duties; or
- a customer or supplier that may prejudice or influence your business relationships or compromise or prevent your business securing the most commercially favourable terms for purchase or supply of goods or services.

At WesCEF, employees should manage conflicts of interest by:

- disclosing any actual or perceived conflicts of interest to the WesCEF CFO, General Manager Human Resources & Corporate Communications or Chief Executive Officer.
- seeking approval from either the WesCEF CFO, General Manager Human Resources & Corporate Communications or Chief Executive Officer before accepting any outside business interests, including non-WesCEF work, business ventures, directorships (other than to a board of a non-trading family company), partnerships or other interests which have the potential to create a conflict of interest; and
- keeping a professional and ethical relationship when dealing with customers and suppliers.

7.6. ENGAGING EXTERNAL PERSONNEL

From time to time WesCEF engages agents, contractors, consultants and other intermediaries (External Personnel), including outside Australia. It is our policy to deal fairly and honestly with all External Personnel and ensure that all relationships with External Personnel are based on price, quality, service and reputation.

WesCEF employees who deal with, or are in a business relationship with External Personnel, are prohibited from accepting or soliciting any personal benefit that might compromise, or appear to compromise, an objective assessment of the products or services to be provided by External Personnel.

WesCEF is committed to the safe and ethical manufacture and supply of goods and services, and reserves the right not to do business with External Personnel who do not share and demonstrate this commitment.

The approval of a manager or senior executive must be obtained before the engagement of External Personnel, following satisfaction of the following criteria:

- a thorough examination of the qualifications and reputation of the External Personnel has been conducted and, where required by the *Wesfarmers Anti-bribery Policy*, a due diligence report has been completed;
- where appropriate, WesCEF or Wesfarmers' internal (and where applicable, external) legal advisers have signed off on terms governing the proposed relationship with the External Personnel. Where required by the *Wesfarmers Anti-bribery Policy*, these should include standard contractual terms on anti-bribery;
- the proposed fee or remuneration arrangements with the External Personnel are on an arm's length basis and reasonable for the services to be provided. Incentive based payments in connection with the securing of business arrangements or transactions for WesCEF must be authorised by the WesCEF CFO, who is the designated executive responsible for applying the *Wesfarmers Anti-Bribery Policy*;
- a system of performance review against agreed standards (covering business conduct and commercial performance) has been established;
- termination procedures are in place in the event of improper or ineffective performance or conduct by External Personnel; and
- External Personnel have been made aware of, and accept, the principles outlined in this Code.

Improper conduct by External Personnel can expose WesCEF to legal liability or reputational damage. WesCEF employees who expressly or impliedly authorise or permit improper conduct by External Personnel may be exposed to personal criminal or civil liability.

7.7. EMPLOYMENT PRACTICES

WesCEF has a wide range of human resources policies covering topics such as equal employment opportunity, diversity, discrimination, harassment and bullying, grievance resolution, travel, and education assistance. Full details of these policies are available on the [WesCEF Connect intranet site](#) or can be obtained from a WesCEF representative and all WesCEF employees and External Personnel are expected to know and observe these policies.

7.7.1 Creating a safe and diverse working environment

The provision of a safe working environment is a non-negotiable priority.

WesCEF recognises the importance of diversity which brings a broad mix of thoughts, skills, ideas and talent to the Division. WesCEF is committed to creating a workforce that is diverse and a workplace that is inclusive where employees are treated with fairness, equity and respect. All WesCEF employees are expected to:

- Take personal responsibility for his or her conduct in the workplace.
- Encourage and recognise the value of diverse thinking.
- Recognise and respect the social and cultural backgrounds of others.

Further information about diversity can be found in the *WesCEF Diversity and Equal Employment Opportunity Policy*.

As set out in the *WesCEF Discrimination, Harassment and Bullying Policy*, WesCEF does not tolerate bullying, harassment, unlawful discrimination or other unacceptable conduct. All employees expect to work in a safe environment that promotes wellbeing. WesCEF employees can create and contribute to a safe, inclusive and supportive environment whereby diversity is embraced, as follows:

- Taking responsibility for a safe working environment by reporting any health or safety issues immediately.
- Ensuring all employees are aware of and abide by WesCEF's health, safety and environment policies.
- Offering and extending support to and working collaboratively and respectfully with other WesCEF employees to create an inclusive and engaging culture.
- Ensuring conduct is free from harassment, bullying and discrimination against other WesCEF employees, and self-monitoring personal conduct which may not be acceptable or deemed appropriate by others.
- Making employment decisions based on merit and performance.

WesCEF recognises that employees may experience grievances in the workplace which need to be addressed and resolved, sometimes with the assistance of others. The *WesCEF Grievance Resolution Policy* and *Grievance Resolution Procedure* outlines further information on resolving issues.

7.7.2 Drug, alcohol and tobacco policy

Alcohol is prohibited at all WesCEF sites

WesCEF has a zero tolerance policy towards alcohol at any WesCEF site, including offices, trucks, company cars, distribution locations and manufacturing plants. Safety at all WesCEF sites is paramount. It will constitute serious misconduct if any employee is found to be in possession of alcohol for consumption or under the influence of alcohol at any WesCEF site. When an employee or External Personnel are attending activities outside of the workplace or working hours such as functions, meetings, conferences or forums, alcohol that is provided is to be served and consumed in a responsible manner.

Illegal Drugs

WesCEF has a zero tolerance policy towards both illegal drug possession at work and being unfit for work due to illegal drug use. It will constitute serious misconduct and provide grounds for immediate summary dismissal if any employee is found to be in possession of illegal drugs or to be under the influence of illegal drugs during working hours, on any WesCEF site, including offices, trucks, company cars, distribution locations and manufacturing plants, on WesCEF business or attending any work function or activity, this will include times when an employee or External Personnel are outside of the workplace or working hours such as functions, meetings, conferences or forums.

Misuse of Prescription Drugs

The misuse of prescription drugs at work, at any WesCEF site, including offices, trucks, company cars, distribution locations and manufacturing plants, when conducting WesCEF business or attending WesCEF sponsored activities, is strictly prohibited. It will constitute serious misconduct and provide

grounds for immediate summary dismissal if any employee is found to have misused prescription drugs, or to be under the influence of prescription drugs as a result of misuse, during working hours, at any WesCEF site, on WesCEF business or attending any work function or activity, this will include times when an employee or External Personnel are outside of the workplace or working hours such as functions, meetings, conferences or forums.

Prescription medication being appropriately taken that may still affect working ability or safety must be communicated to the supervisor of an employee or External Personnel taking prescription medicine. It is the employee's or External Personnel's responsibility to inform their supervisor or manager.

WesCEF employees and external personnel are expected to comply with the requirements of the *WesCEF Fitness for Work Policy* at all times.

Tobacco use

WesCEF promotes a smoke-free environment. Smoking during work hours outside of authorised breaks is not permitted.

At all WesCEF sites, specific and signed locations are designated for smoking. This is for the safety of non-smokers and also for operational safety reasons. Smoking is not permitted at any other location.

7.7.3 Making public statements about the Division

Employees are expected to comply with all sections of this Code, and should bear in mind that any comment made about matters pertaining to the Wesfarmers Group, WesCEF, or its businesses, have the potential to become public knowledge or be deemed a public statement.

Media comment

No WesCEF employee is permitted to comment to the media, or in any social media forum (including but not limited to networking sites, wikis, blogs or microblogs or discussion boards) about matters pertaining to or on behalf of the Division or its businesses, unless duly authorised to do so.

All media contact must be referred to the WesCEF Manager Communications or, where they are unavailable, the relevant business unit General Manager or Chief Executive Officer.

If an employee is concerned about an online discussion or disclosure of information through any social media relating to the division or its businesses, they are strongly encouraged to advise the WesCEF Communications Manager or relevant Communications team member as soon as practical.

Further information about media communications can be found in the *WesCEF Media Policy and Social Media Policy* available on the WesCEF Connect intranet or can be obtained from a WesCEF representative.

Public forums

WesCEF employees should seek the approval of their General Manager before accepting invitations to present or make comment at any public forum, conference, seminar or similar events as a representative of WesCEF. This may include but is not limited to industry conferences, community forums or public presentations.

If presenting or commenting about matters pertaining to the Division or its businesses, WesCEF employees should stick to factual, explanatory comment related to the topic, and avoid discussing business performance, sensitive issues, or speculation about decisions or future directions.

Sensitive issues can include, but are not limited to, acquisitions or divestments, closure of branches, outcomes from legal proceedings, trading conditions, safety and environment, or any matter that may come within the continuous disclosure requirements.

Testimonial

Testimonial requests from suppliers to endorse products or services provided to the Division or its businesses require the approval of General Managers.

8. USE OF WESCEF RESOURCES AND INFORMATION SYSTEMS

All WesCEF employees and External Personnel are required to use property, funds, facilities and services belonging to the Division for authorised purposes and not for personal benefit, or the benefit of unauthorised third parties. WesCEF regards the unauthorised removal of equipment, supplies and other resources belonging to WesCEF as theft.

Information Systems

Email, the internet, facsimile, telephones and other Division information systems, like all other Divisional assets, must be used appropriately. Occasional personal use of WesCEF's information systems is permitted by WesCEF employees, provided that it does not interfere with the performance of work during working hours. WesCEF employees are not permitted to use WesCEF's information systems:

- for personal gain;
- to release or distribute confidential information in an unauthorised manner; or
- to store, display or transmit illegal, objectionable or offensive material. Equal opportunity and harassment policies and guidelines extend to the use of all information systems, including email and the internet.

All forms of electronic communication should be treated with at least the same respect as printed communication.

WesCEF employees and representatives are expected to comply with the requirements of this Code at all times when using social networking sites or other non-work related sites and must comply with the

WesCEF Electronic Usage Policy, which is available on the WesCEF Connect intranet site or can be obtained from a WesCEF representative.

Intellectual Property

Unless otherwise agreed in writing by the Division, any intellectual property developed by an employee during, or as a result of, employment by WesCEF is the sole property of WesCEF. Employees must provide to the Division, and on request assign to the Division any rights in, all work, ideas, concepts, designs, inventions, models, developments and improvements made or developed during the course of their employment or through use of the Division's time, materials, facilities or other resources.

Cessation of Employment

Upon the cessation of employment or working arrangements with WesCEF, all employees or External Personnel must ensure that all books, records, documents (hard copy or electronic and including emails) and other resources of the Division (such as keys, security passes, computer equipment, mobile devices and corporate credit cards) are returned to the nominated supervisor or manager as appropriate. WesCEF employees or External Personnel must also return all confidential information in their possession to their supervisor or manager.

9. ENVIRONMENTAL SUSTAINABILITY

WesCEF operates on the basis that compliance with all applicable local and national environmental protection laws is the minimum acceptable standard, with a constant goal of achieving a higher standard. WesCEF has detailed environmental procedures and systems that support our standards.

WesCEF believes that companies have community responsibilities above and beyond the contribution made by their employment and wealth creation activities. WesCEF is committed to seeking to make positive economic, social and environmental contributions in the communities in which we operate and to ensure that good corporate behaviour is integrated into all aspects of WesCEF's operations. By their actions WesCEF employees are expected to assist WesCEF in meeting these commitments.

10. RELATED DOCUMENTS

- a. WesCEF Discrimination, Harassment & Bullying Policy
- b. WesCEF Electronic Usage Policy
- c. WesCEF Environment Policy
- d. WesCEF Diversity and Equal Employment Opportunity Policy
- e. WesCEF Fraud Risk Management Policy
- f. WesCEF Health and Safety Policy
- g. WesCEF Media Policy
- h. WesCEF Social Media Policy
- i. WesCEF Whistleblower Policy
- j. Wesfarmers Anti-Bribery Policy
- k. Wesfarmers Document Retention and Storage Policy
- l. Wesfarmers Market Disclosure Policy
- m. Wesfarmers Share Trading Policy
- n. WesCEF Grievance Resolution Policy

- o. WesCEF Grievance Resolution Procedure
- p. WesCEF Competition and Consumer Act Compliance Policy
- q. WesCEF's Fitness for Work Policy

11. Document Management

Supersession

This policy supersedes all previous Human Resources policy on Code of Conduct.

Currency

This policy applies from the date of issue until it is replaced by another policy.

For further information please contact Human Resources

**A printed or saved copy is an UNCONTROLLED copy.
Check that it is the latest available version before use.**

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Date Revised:	21 May 2018
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Actual Change Details:	Updated clause 7.5 Conflicts of Interest. Clause expanded to include additional information about personal relationships with employees and suppliers.