

WHISTLEBLOWER POLICY

1. Purpose

Select Harvests (SHV) is committed to maintaining high standards of behaviour in accordance with the expected values to deliver our strategic priorities. The company requires individual compliance with all relevant laws and regulations as well as the company's Code of Conduct, policies and procedures which have been developed to promote and reinforce SHV's commitment to ethical operations.

The purpose of this policy is to provide an alternative grievance mechanism for reporting and resolving concerns about misconduct, malpractice or other behaviour deemed to be dishonest, illegal, corrupt or inconsistent with any of SHV's values or policies. The person reporting the concern ('the whistleblower') will not be subject to any adverse treatment for reporting the concern (as outlined in the Corporations Act 2001 (Cth)).

2. Scope of Policy

This policy applies to all divisions of SHV, with the grievance mechanism reporting available to all directors, management, employees, individuals, contractors, visitors and those engaged as part of SHV's supply chain, including suppliers and third-party labour providers.

3. Reportable Conduct

Reportable conduct includes any conduct of any individual connected with SHV, which the reporting individual reasonably believes is:

- dishonest or illegal;
- fraud, corruption or financial malpractice;
- unethical or improper;
- manipulation of the internal or external audit process;
- harassment, discrimination or bullying;
- potentially damaging to SHV's reputation;
- retaliation against someone who has made a report under this policy; or
- a breach of SHV's Code of Conduct or other governance policies.

4. Matters to Consider Before Reporting

Individuals who make a report under the Whistleblower Policy must do so in good faith and only if they have reasonable belief that reportable conduct has occurred. All SHV employees and contractors making genuine complaints will be protected from reprisal and all investigations will be conducted in accordance with principles of fairness and natural justice. If an employee or contractor makes a false report maliciously, with an ulterior motive, or for personal gain, SHV reserves the right to take appropriate action against that person, including disciplinary action. Whistleblowers also have the right to make anonymous disclosures through internal or external grievance mechanisms.

5. Grievance Procedure

An individual who wishes to report improper conduct or suspected improper conduct can do so under the Whistleblowers Policy. SHV provides a process that ensures confidentiality and anonymity for the individual as long as the reporting individual is not involved in any improper conduct.

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Any individual who wishes to raise a concern may do so by talking to their immediate Manager in the first instance. If the individual is not comfortable talking to their immediate Manager, then the matter can be referred to the Human Resource Department.

If the individual wishes to remain anonymous, they can send a detailed report to SHV's postal address which should list any people involved in the suspected breach, details of the suspected breach, dates, and any relevant information and evidence that will assist in the investigation.

6. Investigating a Report

The Manager receiving the initial report will take the individual's statement and/or prepare a preliminary report inclusive of all the relevant information. The Manager may then undertake any other investigation within their scope of responsibility or refer the matter to an appropriate Senior Officer who has delegated authority in relation to that matter, e.g. financial matters such as bribery and corruption may be referred to the Chief Financial Officer.

In most instances, investigations will be conducted internally. The investigation will be undertaken discretely and will not put the reporting individual at risk, or name that individual in any reports unless the individual is made aware of and approves such disclosure.

However, there may be occasions where external advisers are used to conduct or assist in investigations, either due to the serious nature of the matters raised or due to the complexity of the issue. In some circumstances, and depending on the seriousness of the issue, the reporting individual may need to be interviewed by the police or a legal representative and/or be requested to make a formal statement.

To avoid jeopardising an investigation, an individual who has made a report under this policy is required to keep confidential the fact that a report has been made (subject to any legal requirements).

7. Protection of Whistleblowers

SHV is committed to ensuring confidentiality in respect of all matters raised under this policy, and that those who make a report in good faith are treated fairly and do not suffer any disadvantage.

Individuals will be offered the following protection:

- Protection of identity and confidentiality – Subject to compliance with legal requirements, SHV will not disclose any particulars of the report that would suggest or reveal identity without first obtaining consent.
- Protection of files and records – All files and records created as a result of the investigation will be retained under strict security and will not be shared or released with anyone other than the Manager(s) or parties conducting the investigation.
- Fairness – Whistleblowers will not be subjected to detrimental treatment as a result of making a report in good faith under this policy. Detrimental treatment includes victimisation, intimidation, retaliation, dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or any other adverse or unfavourable treatment connected to making a report.

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8. Availability of Whistleblower Policy

The Whistleblower Policy can be found on SHV's hard drive accessible to all directors, management, and employees. A hard copy or email copy is available to all individuals and can also be obtained from the HR Department.

9. Reporting Breaches or Concerns

It is expected that individuals who become aware of known or suspected breaches of conduct will make a report under this policy.

A summary of the Grievance Reporting Procedure is outlined in Appendix B.

If you feel uncomfortable reporting to your immediate Manager, you have the option of raising it with the following HR Managers or send an anonymous report to our postal address:

Nick van Luyt

Human Resources and Safety Manager – Food Products and Corporate

Phone: 03 9474 3502

Email: nvanluyt@selectharvests.com.au

Sandra Kitt

Human Resources and Safety Manager – Almond Division

Phone: 03 5052 0315

Email: skitt@selectharvests.com.au

Postal Address (for anonymous reports):


Human Resources Department
Select Harvests Food Products Pty Ltd
360 Settlement Road
Thomastown Vic 3074
Australia

10. Reference material / other related policies:

- Australian Standard AS 8001 – “Fraud & Corruption Control”
- Australian Standard AS 8004 – “Whistleblower Protection Programs for Entities”
- *Corporations Act 2001* – Section 1317 AA
- *Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2019* (Cth)
- Fair Work Ombudsman – “My Employment Checklist”
- Fair Work Ombudsman – “Fair Work Information Statement”
- D’Accord (free and confidential counselling service) – 1300 130 130
- Select Harvests – in control of our destiny
- HCA000A – Code of Conduct

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11. Authorisation and Approval:

Document Name	HCP028 – Whistleblower Policy
Document Manager	General Manager – Human Resources
Document Department	Human Resources
Contact	HR@selectharvests.com.au
Approval Authority	Paul Thompson – Managing Director
Approval Signature	
Release Date	1/5/19
Review Date	+ 2 years
Version*	1.1

*Version History can be found in “SHV Company Policy Register”

Select Harvests – in control of our destiny



Mission

To Deliver Sustainable Stakeholder Returns by being a Leader in the Supply of Better For You Plant Based Foods

Values

Trust & Respect	Integrity & Diversity	Sustainability	Performance	Innovation
Treat all stakeholders with trust and respect	All decisions and transactions will not compromise the integrity of the organisation or individual	Our focus is on the long-term sustainability of our environment, business and community	Exceed expectations on a daily basis	Constantly challenge ourselves to improve everything

Vision

Select Harvests to be Recognised as Australia’s most Respected Leading Agri-Business

Strategy

The pathway to achieving our vision

Optimise the Almond Base	Grow our Brands	Expand Strategically
Increase productivity and achieve sustainably high yields from our growing almond orchard base	Grow our consumer and industrial brands, aligned to the increasing consumption of plant based foods	Pursue value accretive acquisitions that align with our core competencies in the plant based agrifoods sector

Operational Focus

What we do everyday

Customers	Supply Chain	People	Capital
Exceed our current customer’s expectations and grow our customer base, focused on the Asian marketplace	Optimise our end-to-end supply chain to achieve maximum value for the business as a whole	Focus on company culture, leadership development and staff training, attraction and retention	Target capital discipline, balance sheet strength, superior shareholder returns and long term growth

Goal

Sustainable Shareholder Value Creation



Appendix B: Grievance Reporting Procedure

