



SELECT HARVESTS

CODE OF CONDUCT

Revised January 2021



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STATEMENT

This Code of Conduct ('the Code') sets the standards and guidelines for acceptable practices by Select Harvests, its people and communities in which we operate. These behaviours and responsibilities extend to how we treat our Board of Directors, Executive Team, all employees, contractors, visitors, customers, business partners, shareholders, members of the community, our environment and wildlife.

OBJECTIVE

The objective of the Code is to clearly set the guidelines which every person in the business is always required to abide by.

EXPECTATIONS

Select Harvests (SHV) is committed to ensuring that the Board, management, and employees exhibit the highest level of personal integrity and honesty and provide superior service.

In adhering to the Code, the following standards are expected:

- obey the law;
- respect every employee's dignity, rights, freedoms and individual needs;
- provide a working environment that is safe, challenging and rewarding;
- recognise the work of our employees; and
- reinforce the organisation's commitment to the highest standards in business and professional ethics.

In adhering to the Code, all employees will:

- obey the law;
- treat everyone with honesty, courtesy and respect;
- respect and safeguard the organisation's property and that of fellow workers;
- maintain confidentiality;
- perform duties to the best of their ability considering their skills, experience, qualifications and positions;
- do their jobs in a safe, responsible and effective manner;
- ensure their personal business and financial interests do not conflict with their duty to Select Harvests; and
- comply with Select Harvests' policies, procedures, and rules.

Together with our values and behaviours, policies and procedures, the Code is a guiding document that sets out the principles on how we do the right thing by the business and each other.

When the outlined expectations are met, it enables the right leadership and culture to drive performance in an environment which makes Select Harvests a great place to work. The Code has the full support of the Board of Directors and Executive Team.



Paul Thompson
Managing Director

Select Harvests - in control of our destiny



OUR VALUES

VALUE	ACCEPTABLE BEHAVIOURS	UNACCEPTABLE BEHAVIOURS
<p>Trust & Respect</p> <p><i>Treat all stakeholders with trust and respect</i></p>	<ul style="list-style-type: none"> ✓ Treating all with trust and respect ✓ Trusting that each of us has the right set of skills and knowledge to perform our job well and showing confidence in our abilities and the abilities of others ✓ Looking after our physical and mental health ✓ Listening to each other and respecting different opinions ✓ Communicating in an honest and open way ✓ Respecting, encouraging, and celebrating the inclusion and diversity of our people, customers, stakeholders, and the communities in which we operate 	<ul style="list-style-type: none"> ✗ Lying, exaggerating the truth, and giving inaccurate and false information ✗ Interrupting and not letting others speak and express their opinions and ideas ✗ Bullying and harassment ✗ Competing against others to the detriment of the business ✗ Withholding information, referrals, or business opportunities
<p>Integrity & Diversity</p> <p><i>All decisions and transactions will not compromise the integrity of the organisation or individual</i></p>	<ul style="list-style-type: none"> ✓ Obeying the law ✓ Conducting business and relationships fairly, honestly, and ethically ✓ Acting in the best interests of Select Harvests, our shareholders, customers, and each other ✓ Acting in a professional and safe manner and complying with legal and company requirements, policies, and procedures ✓ Protecting and representing Select Harvests' brand and reputation through our actions and behaviour 	<ul style="list-style-type: none"> ✗ Engaging in fraudulent, dishonest, or negligent activity ✗ Accepting behaviour from others that is illegal, unethical, or disrespectful ✗ Ignoring business practices ✗ Avoiding conflict or confrontation by not raising issues or concerns ✗ Raising issues or concerns in an aggressive, disrespectful, or inappropriate manner ✗ Allowing yourself or others to put their safety at risk ✗ Criticising Select Harvests publicly ✗ Blaming others for mistakes

VALUE	ACCEPTABLE BEHAVIOURS	UNACCEPTABLE BEHAVIOURS
	<ul style="list-style-type: none"> ✓ Admitting our mistakes, taking responsibility, learning from them, and asking for help when needed ✓ Raising issues or concerns about any inappropriate practices in our business with the intention to provide useful feedback and make a positive difference ✓ Embracing and respecting the diversity of our people and valuing their different backgrounds, experience, and skills 	<ul style="list-style-type: none"> ✗ Wasting company time and resources ✗ Discriminating against others based on protected attributes defined by relevant legislation (including but limited to gender, age, sex, ethnicity, sexual orientation, and social status)
<p>Sustainability</p> <p><i>Our focus is on the long-term sustainability of our environment, business and community</i></p>	<ul style="list-style-type: none"> ✓ Developing beneficial relationships with each other, customers, suppliers, and the community ✓ Reducing the impact of resource usage, hazardous substances, waste, and emissions on the physical environment ✓ Increasing business efficiency, productivity, and profit ✓ Maintaining a clean and healthy environment for future generations ✓ Promoting employee safety and wellbeing ✓ Modelling professional appearance, behaviour and always conduct with our customers and in our community <p>Actively supporting our communities</p>	<ul style="list-style-type: none"> ✗ Wasting company, natural or environmental resources ✗ Acting to the detriment of our environment, the business, and community ✗ Accepting conduct or behaviour that reflects poorly on Select Harvests ✗ Not growing and maintaining valuable business and community relationships

VALUE	ACCEPTABLE BEHAVIOURS	UNACCEPTABLE BEHAVIOURS
<p>Performance</p> <p><i>Exceed expectations on a daily basis</i></p>	<ul style="list-style-type: none"> ✓ Making sure everyone is safe at work ✓ Taking personal responsibility to perform at our highest standard ✓ Delivering what we promise on time ✓ Setting clear and realistic goals and standards ✓ Sharing relevant information to understand the business and its financial results ✓ Being persistent and disciplined in overcoming obstacles and achieving goals ✓ Giving honest, constructive, and regular feedback ✓ Coaching, training, and supporting others ✓ Rewarding and celebrating the achievement of goals 	<ul style="list-style-type: none"> ✗ Not treating safety as our highest priority ✗ Considering safety as someone else's responsibility ✗ Achieving less than we have committed to ✗ Being unclear on our performance expectations and not asking for clarity ✗ Not taking appropriate action to address under performance ✗ Assuming instead of asking ✗ Blaming conditions or others for our lack of results ✗ Not giving people opportunities to have performance, development, and coaching conversations
<p>Innovation</p> <p><i>Constantly challenge ourselves to improve everything</i></p>	<ul style="list-style-type: none"> ✓ Welcoming change; discovering ways to continuously improve and learning by mistakes ✓ Encouraging ideas and welcoming diversity of experience and thought ✓ Recognising success and sharing the results ✓ Investing in our future success by developing our people and technology 	<ul style="list-style-type: none"> ✗ Creating an environment that discourages people from diversity of thought and suggesting ideas ✗ Applying inefficient processes ✗ Resisting change ✗ Resistance to learning ✗ Unwilling to learn from mistakes and improve

GUIDELINES FOR ETHICAL BEHAVIOUR

The following section provides conduct guidance in relation to specific topics. Employees are also required to read the company’s related policies referenced below.

<p>ALCOHOL & OTHER DRUGS</p>	<p>Consumption and storage of alcohol or non-prescribed drugs at work is strictly prohibited.</p> <p>The use of alcohol or illegal drugs that might affect anyone’s safety, work, public relations, or violate State drug, drinking and driving law is not permitted.</p> <p>SHV reserves right to conduct random drug and alcohol tests across all sites, and employees are required to participate. If an employee refuses to undergo a drug and alcohol test or tests positive, they may be subject to disciplinary action.</p> <p><i>(Reference – Alcohol and Drugs in the Workplace Policy)</i></p>
<p>ANTI-SLAVERY</p>	<p>Our commitment as a company, to ensure our people are safeguarded, treated fairly and with dignity, include:</p> <ul style="list-style-type: none"> • maintaining clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation; • examining our supply chains and being clear regarding our expectations; • leading by example and conducting appropriate checks on all employees, labour hire agencies, and suppliers; • providing clarity on our hiring, disciplinary and termination practices; • training Managers to remain alert and respond appropriately to indicators of slavery, listening and being approachable to employees, and raising awareness; • a grievance process; and • reviewing our Labour Standards annually (or as required) to ensure compliance with the obligations under the <i>Modern Slavery Act 2018</i>. <p>We all have a responsibility to uphold human rights. If you suspect someone is being exploited, ill-treated, controlled, or forced by someone else to work or provide services, you need to report breaches or concerns.</p> <p><i>(Reference – Ethical Sourcing Policy)</i></p>
<p>CLAIMS & COMPLAINTS</p>	<p>In responding to any claims or complaints against Select Harvests, we will investigate the issue objectively and ensure that the complainant is kept informed of the progress.</p>
<p>COMPANY POLICIES & PROCEDURES</p>	<p>Select Harvests’ policies and procedures are developed to ensure the business operates in a safe, consistent, effective, and legally compliant manner.</p>

	<p>All employees must comply with all of Select Harvests' policies and procedures.</p> <p>If you are unsure about any policy or procedure you should discuss the relevant policy or procedure with your Manager.</p>
CONFLICT OF INTEREST	<p>You must always act in the best interests of Select Harvests and conduct business in accordance with Select Harvests' policies and procedures. You must not allow your own personal interests to override these obligations.</p> <p>A conflict of interest exists where loyalties are divided. In determining whether a situation involves a conflict of interest, consider whether your personal interests or relationships could interfere or influence obligations towards Select Harvests or its clients.</p> <p>You should pay particular attention to situations where your responsibilities require you to recommend or make a decision or take action on behalf of Select Harvests which involve:</p> <ul style="list-style-type: none"> • immediate family or other relatives; • friends or acquaintances; • business partners; or • other personal interests including political, religious, or special interest groups. <p>When involved in buying or selling goods and services on the company's behalf you should avoid any relationship, financial or otherwise, with suppliers and clients that could be unfairly influencing judgment.</p> <p>If you have a pecuniary (financial) interest it must be declared immediately to your Manager.</p> <p><i>(Reference – Conflict of Interest Policy, Fraud Anti-Bribery and Corruption Policy)</i></p>
CUSTOMER SERVICE	<p>All employees will strive to provide a superior level of customer service at all times.</p> <p>A customer with a concern is to be treated politely and with respect.</p> <p>The concern is to be resolved as quickly as possible.</p>
EEO, BULLYING & HARASSMENT	<p>At Select Harvests we are all responsible for fostering a working environment where everyone is treated with trust and respect. This includes not engaging in conduct or behaviour which involves unlawful discrimination, bullying or harassment.</p> <p>Select Harvests' equal opportunity objectives are:</p> <ul style="list-style-type: none"> • to eliminate discrimination and harassment in the workplace; • to create a workplace that is free of discrimination and victimisation where each person has the opportunity to

	<p>progress to the full extent of their ability;</p> <ul style="list-style-type: none"> • to ensure that staff are made aware of their rights and obligations; and • to provide a mechanism which enables any reports of discrimination, harassment, bullying and victimisation to be investigated thoroughly, fairly, and confidentially. <p>It is unlawful for anyone to discriminate against, harass or bully others. An individual may be subject to a disciplinary process or held personally and legally liable for any action brought by another person.</p> <p><i>(References – EEO, Anti-Discrimination, Bullying & Harassment Policy, and Workplace Fair Treatment Policy)</i></p>
<p>ENVIRONMENTAL PROTECTION & SUSTAINABILITY</p>	<p>In accordance with Select Harvests’ Sustainability and Environment Policy, the company is committed to fulfilling its moral and legal environmental responsibilities related to, but not limited to:</p> <ul style="list-style-type: none"> • air borne particulate and gas discharge; • sewer and drainage discharge; • non-renewable natural and generated resources such as fuel, water, electricity and gas; • recycling of materials and waste minimisation; • land usage and reclamation; • carbon emissions; • maintaining a sustainable environment; and • protection of wildlife and bees. <p>All employees have a responsibility to enact the company’s Sustainability and Environment Policy in their immediate work activities and areas of influence.</p> <p><i>(Reference – Environment and Sustainability Policy)</i></p>
<p>FAIR COMPETITION</p>	<p>Fair competition means that we will:</p> <ul style="list-style-type: none"> • know about and follow Select Harvests’ legal obligations, purchasing, contracting, capex policies and procedures; and • compete on the basis of customer service and non-obstructive competitive conduct. <p>As part of our commitment to fair trading, management and employees will:</p> <ul style="list-style-type: none"> • not differentiate unfairly between customers when supplying products or services; • not refuse to deal with, or discriminate against, a customer for any improper reason; • not intimidate or threaten another person or organisation; and • only use our strengths in legitimate ways. <p>We aim to be an effective competitor and to deliver services according to accepted industry and ethical standards.</p>

	<p>No bribes, payoffs or kickbacks will be paid or accepted.</p> <p>In all dealings with others, we will be courteous, well-informed, truthful and careful not to misrepresent the quality, features or availability of our services.</p> <p>Competitive information will be obtained only by ethical means – attempts to collude with internal or external stakeholders to gain or provide competitive information are not permitted.</p> <p><i>(Reference – Conflict of Interest Policy, Fraud Anti-Bribery and Corruption Policy)</i></p>
FUNDS	<p>Every employee who has control of Select Harvests’ funds is personally, accountable for them.</p> <p>Funds can mean electronic fund transactions, cash, gift vouchers or fuel charge cards.</p> <p>Misuse will be treated as a serious breach. Theft of any item purchased via company funds is also unacceptable.</p> <p><i>(Reference – Fraud Anti-Bribery and Corruption Policy)</i></p>
IMPROPER INFLUENCE	<p>No pressure is to be put on employees to influence their personal preferences in private or political matters.</p> <p>Further, no approval, disapproval or judgement should be expressed by an employee of another employee’s private political or personal preference or activities.</p>
INCLUSION & DIVERSITY	<p>Select Harvests recognises that an inclusive and diverse workforce supports its goals to achieve business success through the diversity, quality, and skill of our people. We appreciate that each employee brings their own unique capabilities, experience, and characteristics to their work.</p> <p>Select Harvests’ diversity encompasses differences in:</p> <ul style="list-style-type: none"> ● ethnicity; ● gender; ● language; ● age; ● sexual orientation; ● socio-economic status; ● physical and mental ability; ● thinking styles; ● experience and education; and ● religious and cultural beliefs. <p>We are committed to employing the best people based on merit and performance. We believe that the wide array of perspectives that</p>

	<p>results from such diversity promotes innovation, creativity, flexibility, and business success. It makes us more productive, unique and competitive.</p> <p><i>(Reference – Inclusion and Diversity Policy)</i></p>
LAW	<p>Select Harvests is subject to Municipal, State and Federal laws. We have a duty to obey the law.</p> <p>No one can be directed to carry out an illegal act, and no one can justify an illegal act by claiming to be acting under the order of a Manager, Senior Officer, another employee, or to be simply complying with policy. An employee is also not allowed to commit a fraudulent or malicious act.</p> <p>Any employee who is caught performing an illegal act will be subject to disciplinary action and may also be subject to legal action.</p> <p>All employees are encouraged to immediately report illegal actions by others to their direct Manager or HR Manager. Confidentiality will be maintained when such reports are made.</p> <p><i>(Reference – Fraud Anti-Bribery and Corruption Policy, Whistle-blower Policy)</i></p>
LEAVING SELECT HARVESTS' EMPLOYMENT	<p>On leaving Select Harvests, you must surrender any assets or items containing Select Harvests' information to your manager.</p> <p>Even after leaving Select Harvests, you have a continuing obligation to maintain the confidentiality of issues and projects whilst employed by Select Harvests unless you have sought and obtained written consent from the company to utilise such information.</p>
OUTSIDE EMPLOYMENT & OTHER ACTIVITIES	<p>In taking up external duties or activities not related to your employment with the company, you will ensure:</p> <ul style="list-style-type: none"> • to keep your involvement in outside activities, separate to your work with Select Harvests; • to consult with your Manager when you are considering additional external employment or anything where there may be a conflict of interest; • to not use Select Harvests' property, information, money, facilities, time, or the services of fellow workers towards outside employment and other activities not related to Select Harvests; and • to avoid outside activities that are likely to affect either your work or someone else's work or which could discredit Select Harvests in any way.

<p>PERSONAL CONDUCT</p>	<p>Our personal conduct is to be consistent with the Code.</p> <p>We will deal fairly and honestly with each other, clients, business suppliers and competitors.</p> <p>This means:</p> <ul style="list-style-type: none"> • handing all internal and external client contacts with professionalism and courtesy; and • reporting to work as scheduled, keeping absences to a minimum, and when an absence is necessary promptly notifying your Manager of the reason. <p>To ensure a productive and safe workplace, the following are not permitted:</p> <ul style="list-style-type: none"> • working in an unsafe manner; • misusing or adjusting Select Harvests’ property, plant, equipment or services (e.g. telephone, email, etc.); • smoking in buildings and company vehicles; • using, possessing or trafficking illegal or unprescribed drugs; • having possession of or consuming alcohol on a work site or having a blood alcohol level that might affect anyone’s safety or Select Harvests’ image in the community; • using offensive language, unwarranted or violent physical behaviour; • harassing, intimidating or abusing others in any manner; • using access of the company’s or own electronic media to intimidate, denigrate or pass any judgement on the company or another employee’s activities which may bring Select Harvests into disrepute; and • using any equipment or plant which we are not authorised or trained/accredited to use.
<p>PROPERTY</p>	<p>We all share the responsibility for looking after Select Harvests’ property, especially if it is under our control.</p> <p>Select Harvests’ property must not be removed without authorisation or used for personal benefit or any other improper purpose.</p> <p>Select Harvests’ property may only be given away, lent, destroyed or otherwise disposed of, if this action is properly authorised in writing, no matter how old or damaged an item may be. The relevant asset register must be appropriately noted.</p>
<p>PRIVATE & WORK-RELATED COMPANY VEHICLE USAGE</p>	<p>Anyone using a company vehicle must ensure that it is not used in a way that will reflect poorly on Select Harvests reputation in the wider community. Vehicles must not be used for unauthorised purposes.</p> <p>Only employees who have been given prior authorisation and have a current and appropriate Drivers Licence may drive Select Harvests’ vehicles.</p>

	<p>Employees given prior authorisation may use their own vehicle for work related purposes provided their vehicle is roadworthy and insured.</p> <p>A company vehicle which is issued to an employee inclusive of travel to and from work shall only be used within those parameters. A company vehicle is not to be lent to a family member or used in lieu of your own vehicle for purposes other than work.</p> <p>An employee issued with a company vehicle shall maintain a logbook and record the travel date, destination, kilometres and purpose of each trip.</p> <p><i>(Reference – Travel Vehicle and Related Expense Policy)</i></p>
<p>PRIVACY OF COMMUNICATION</p>	<p>Customers and employees expect their communication with Select Harvests to be kept secure and confidential. The <i>Privacy Act 1988</i> also provides sanctions against improper use of confidential information.</p> <p>As a Select Harvests employee, you will not:</p> <ul style="list-style-type: none"> • disclose any confidential information for any reason other than the purpose it was collected for; • use any information to your personal advantage; • permit unauthorised persons access to information not concerning them. <p>Requests from police, government agencies or anyone outside Select Harvests, for information about employees or customers, is to be directed to the relevant Manager or HR Manager.</p> <p><i>(Reference – Privacy Policy)</i></p>
<p>PROTECTION OF INFORMATION</p>	<p>As employees, we maintain the privacy of Select Harvests' information and protect it from any disclosure. Most of our information relates to clients and suppliers who expect, on both legal and ethical grounds, that this information will be protected.</p> <p><i>(Reference – Fraud Anti-Bribery and Corruption Policy)</i></p>
<p>QUALITY</p>	<p>All employees have an obligation to ensure that products or services which do not meet the required standard are identified and reported to the appropriate management level.</p> <p>Select Harvests is committed to supplying its customers with goods that meet or exceed the required specification.</p>
<p>SAFETY</p>	<p>SHV's Zero Harm and Wellbeing strategy is committed to providing its employees with a working environment which is healthy, safe and productive, from both a mental and physical wellbeing perspective.</p> <p>All employees are required to participate in the company's training programs which are implemented for each specific site and role.</p>

	<p>Under the <i>Occupational Health and Safety Act</i> (Federal and State) it is illegal for anyone to partake in behaviour that may endanger themselves or others.</p> <p>Your Manager can advise you of relevant safety and induction training that is specific to your area. Your site-specific safety instructions must always be observed. If in doubt, ask your Manager and, if necessary, specialist or technical advice may also be available through the HR Department.</p> <p>It is everyone’s obligation to maintain a safe work environment and any hazard must be immediately attended to and reported to your Manager and HR Manager.</p> <p><i>(Reference – OHS Policy and Statement)</i></p>
<p>SOCIAL MEDIA & TECHNOLOGY</p>	<p>Social media through various means of electronic devices such as computer, laptop, phone or iPad etc, is an accepted means of individuals and organisations exchanging information.</p> <p>At times, this communication avenue has been used to denigrate, embarrass or harass others. Such usage is not sanctioned and may result in disciplinary action.</p> <p>Use of personal devices for inappropriate activities, whether in company or own time, may breach another employee’s or the company’s confidentiality, ethics and/or trust. It is therefore important that all employees understand that inappropriate behaviour at or outside work has potential employment and perhaps legal consequences.</p> <p>All employees need to be aware that work related use of communication options is generally for work related purposes, however limited personal usage in lunch breaks for legitimate purposes is appropriate. Distribution of inappropriate material using company provided technology is not permitted.</p> <p>Inappropriate material is material that may be considered offensive, pornographic, insulting, discriminatory, confidential, inaccurate, unprofessional or a combination of these factors. This list is not exhaustive.</p> <p>Any storage of excessive or inappropriate amounts of personal data on company systems is not appropriate and all storage systems are subject to access by company authorised officers.</p> <p><i>(Reference – Social Media and Technology Policy)</i></p>

WHO DOES THIS CODE APPLY TO?

This Code applies to all SHV's Board, management, and employees. The Board, management and all employees are required to provide a signed copy of the Code of Conduct Annual Declaration to the HR Department annually. Employees who contract the services of agents, contractors or consultants must ensure that the agent, contractor, or consultant receives a copy and complies with this Code.

WHERE CAN I GET A COPY OF THE CODE?

A copy of this Code can be found on our website. All new employees will also be provided a copy. <http://www.selectharvests.com.au/documents/SHV-Code-of-Conduct-19.pdf>

ADHERENCE TO THE CODE

This Code has the full support of the Select Harvests' Board of Directors and Executive Team. Compliance with this Code is taken seriously. Employees and management who disregard the Code are subject to disciplinary action, including instant dismissal for gross misconduct. Failure to comply with the Code by agents, contractors or consultants may result in Select Harvests not engaging with those businesses.

REPORTING BREACHES OR CONCERNS

You have a responsibility to immediately report any breaches or suspected breaches of this Code by a colleague to your Manager or the HR Department.

Some examples of concerns include, but are not limited to:

- risks to the health and safety of a person;
- suspected fraud;
- corruption; and
- illegal activity.

All reports will be kept confidential and no employee will be disadvantaged or prejudiced by reporting in good faith a breach or suspected breach of law, regulation, or this Code.

For more information on how to make a report, refer to Select Harvests' Whistle-blower Policy which is designed to protect whistle-blowers, and encourage the raising of important issues or concerns.

CONTACT DETAILS

General Manager – HR & Sustainability
Phone: +61 3 9474 3544

HR and Safety Manager – Almond Division
Phone: +61 3 5052 0315

**Employee Assistance Provider
(EAP – D'Accord)**
Phone: 1300 130 130

Whistle-Blower
Dan Feldman
dfeldman@hrlegal.com.au
Phone: 03 9948 2450

