

## Bega Group Standards of Business Conduct

### A Commitment to Operate with Integrity

Bega Cheese Limited and its subsidiary companies (Bega) sets consistently high standards of business conduct and ethics. We aim to deliver strong business results, whilst ensuring that we never compromise our values.

#### Code of Conduct

The Group Code of Conduct outlines the responsibilities that employees, contractors, consultants and Directors have to Bega. The Board of Directors and management recognise the need for Bega to observe the highest standards of corporate practice and business conduct in the Group’s interaction with its customers, shareholders, employees, suppliers, business partners, the community and the environment in which we operate.

The Board has endorsed the Code of Conduct as part of the Group’s corporate governance framework.

### Corporate Responsibility Principles

Bega is committed to conducting business in an ethical manner. To ensure that the Company works with suppliers that share this commitment, the Company has established corporate social responsibility and other supplier requirements that are described below. Suppliers must adhere to these requirements at all times. Bega expects its suppliers and customers to adhere to applicable legal requirements in their business relationships, including those with their employees, their local communities and Bega.

#### Child Labour and Forced Labour

The Supplier must not and will not employ children in the workplace nor use forced labour, which means any work or services performed involuntarily under threat of penalty. The Supplier must comply with the minimum employment age limit prescribed by laws of the relevant jurisdiction or any international treaty or convention applicable in or adopted by Australia.

#### Safety and Health

In addition to the applicable legal protections, the Supplier’s employees must be appropriately protected from exposure to hazardous materials and unsafe working conditions and must have access to potable water and clean sanitation facilities.

#### Working Hours

In addition to complying with all applicable local, state and national laws, the Supplier must adhere to commonly accepted industry standards on working hours. While recognising the need to address legitimate seasonal or other variations in business demands, the Supplier must:

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- (a) maintain a reasonable overall pattern of required working hours and days off for its employees so that total work hours per week do not regularly exceed industry norms;
- (b) pay fair and timely compensation, including any premium payments required for overtime work; and
- (c) advise employees when hired if mandatory overtime is a condition of employment.

#### Wages and Benefits

The Supplier must provide wages (including any premium payments required for overtime work) and benefits that equal or exceed those required by applicable local, state and national laws and regulations.

#### Non-Discrimination

The Supplier must hire, compensate, promote, discipline and provide other conditions of employment based on an individual's performance and ability to do the job. The Supplier must not discriminate based on a person's race, sex, age, nationality, marital status, ethnic origin or any other legally protected status.

#### Harassment and Abuse

The Supplier must provide a workplace free from harassment, which can take many forms, including sexual, verbal, physical or visual behaviour that creates an offensive, hostile or intimidating environment.

#### Disciplinary Practices

The Supplier must not use corporal punishment or other forms of mental or physical coercion as a form of discipline.

### Fair Business Practices

Bega aims to compete effectively and fairly in the markets in which it operates. It will be honest, ethical and responsible in the way it presents products and services to its customers, uses its market power and its pricing practices.

Bega expects that as a valued business partner, the businesses we deal with will have policies that promote similar ethical practises and that compliance with all applicable laws and regulations will be monitored.

#### Fraud and Corruption

Any acts of fraud, corruption, misappropriation and deception are unacceptable. Compliance with fraud and corruption policies, anti-corruption laws and other associated laws and regulations is a condition of employment or association with Bega.

Bega will not tolerate any acts or attempted acts of fraud or corruption in any form whether direct or indirect.

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## Compliance Framework

In view of Bega’s commitment to strong corporate governance, we are keen to encourage a culture in which people want to work and where workplace misconduct is identified and reported

### Ethics and Compliance Service

Employees are encouraged to report any concerns they have about possible wrongdoing such as theft, fraud, dishonesty, harassment or unethical behavior or workplace safety hazards to their Leader, a manager or People & Capability. If the employee feels their concerns are not being dealt with or they do not feel comfortable to discuss, external reports can be made through the channels below.

### Open Communication

At Bega, we maintain open channels of communication with our staff, suppliers, customers and other key stakeholders. It is important to us that our business partners, staff and stakeholders adhere to our Values and comply with all applicable laws and regulations. If you are aware of any actual or potential violation of Bega’s Standards of business conduct or of any applicable law, we ask that you report the violation immediately as prescribed below in ‘External Reports of Wrongdoing’.

### External Reports of Wrongdoing

Reports of suspected wrongdoing may be brought to our attention via our fully outsourced independent Whistleblower service that operates 24 hours a day, 7 days per week. The service provides independence and the option of anonymity. The service can be contacted in one of four ways:

Phone: 1300 913 271 (within Australia)

Website: [www.yourcall.com.au/bega](http://www.yourcall.com.au/bega)

Email address: [begadisclosures@yourcall.com.au](mailto:begadisclosures@yourcall.com.au)

Post to: Bega Your Call.  
Locked Bag 7777  
Malvern VIC 3143

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