

A man and a woman are shown from the chest up, looking down at something the woman is holding in her hands. The man is on the left, wearing a blue and black checkered shirt and a grey beanie. The woman is on the right, wearing a black jacket over a checkered shirt. The background is bright and out of focus, suggesting an outdoor setting. The Ravensdown logo is visible on the man's shirt and the woman's jacket.

  
ravensdown

# Code of Business Conduct

Smarter farming  
for a better  
New Zealand –  
Ka pūkekotia a  
Rongomātāne,  
ka poho kererū  
a Aotearoa.



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*This Code of Business Conduct sets out how we conduct ourselves at Ravensdown and applies to all of our people, regardless of location or role.*

Ravensdown requires all directors and employees (including of our subsidiaries) to undertake their work lawfully, professionally and in accordance with this Code. It also sets out our expectations for our joint venture partners, contractors and consultants. We expect that our people will take reasonable steps to ensure that anyone conducting business on behalf of Ravensdown also complies with this Code.

This Code of Business Conduct replaces our previous internal Code of Business Conduct and Ethics, and is supported by a number of detailed internal policies which we reference throughout for employees to access.

Revised June 2023.









# Our Vision

Smarter farming for a better New Zealand  
– Ka pūkekotia a Rongomātāne, ka poho  
kererū a Aotearoa.

Ravensdown is proud to publish this Code of Business Conduct which encompasses our commitment to keep our people safe, and to safeguard our culture, placing social and environmental governance at the core of everything we do.

We have refocussed the vision and strategy for our business and we are investing in our focus on long-term sustainability, acknowledging Te ao Māori as we strive together with our stakeholders. We want to lead the way in doing what is right, to the best of our ability, demonstrating our integrity as individuals and as a business and having the courage to front up to our challenges.

Ravensdown's cooperative structure gives us a special relationship with our most important stakeholders – the members of our cooperative, who are shareholder customers. We want to bring them on this journey with us, along with our suppliers and local communities and iwi.

This Code explains our expectations of conduct within our business, and also for our engagements with our customers, suppliers and local communities. We have drawn together our internal policies and our renewed environmental, social, and governance ("ESG") commitments to provide a transparent and evolving Code that we are proud to share.

Our Code sets out our commitments to human rights, to conducting business fairly, to upholding the principles of Te Tiriti o Waitangi, to community development, to environmental protection and to reducing climate change. We recognise that all of these areas are complex. We know that we can learn from others and contribute to the emerging recognition of the importance of these issues for our business. In the same way, we want to support our shareholders to increase their understanding of these issues. As our experience grows, we will be increasingly asking our suppliers to commit to the values in this Code alongside us.

We know that we are at the early stages of this journey and we welcome feedback. We invite you to share your experiences and feedback with us.

**Bruce Wills Board Chair / Garry Diack CEO**



# Our Valued Behaviours

At Ravensdown, everything we do centres around smarter farming for a better Aotearoa New Zealand, interconnecting productivity and sustainability.

We are trusted nutrient leaders in the areas of science, supply and solutions for an agricultural sector which is striving for more sustainable ways forward. We strive to be the 'go to' chosen partners for farmers and growers who need to improve environmental and productive performance.

With leadership and integrity at the forefront, our character is shaped by consistently modelling the following valued behaviours:

01



## Trusted

- Leading the way and doing what is right to the best of our ability – all the time, every time.
- Seen as, and perform as, the experts. Always considering how our internal and external customers benefit from that expertise.
- Demonstrating the integrity that is our backbone – consistently doing what we say we will do.

02



## Courageous

- Open-minded and pioneering, no challenge is too difficult as we seek to innovate for a smarter approach.
- We focus on solutions and taking real action to achieve them. We're busy 'getting on with it' – following through on commitments.
- We have the courage to front up – to face up to the good, the bad, and the ugly.

03



## Te ao Māori

- Embracing a Māori world view.
- Te ao Māori acknowledges the interconnectedness and interrelationship of all living and non-living things.
- Taking the long view and supporting the kaitiaki, the guardians, as we strive together for more sustainable ways forward.

## We must always:

- ✓ act honestly and fairly with due skill, care and diligence in the interests of all of our stakeholders;
- ✓ demonstrate respect for diversity, individual rights, equality and dignity;
- ✓ value personal and professional integrity, trustworthiness and competence;
- ✓ be accountable for all of our actions and decisions; and
- ✓ be responsible corporate citizens who promote and strive to create a sustainable environment.



# Code of Business Conduct

## OUR PEOPLE

### Our commitment to human rights

Ravensdown is an integral part of Aotearoa New Zealand's agricultural sector. In order to supply nutrients to producers around the country, we purchase raw materials and processed products from all over the world.

To demonstrate our commitment to the best practice business and human rights standards recognised internationally, we have adopted the United Nations Guiding Principles (UNGPs) on Business and Human Rights and the Human Rights chapter of the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises as guiding frameworks across our operations and supply chains. These international guidelines require companies to respect human rights in their operations and supply chains:

- The **OECD Guidelines for Multinational Enterprises** are government-backed recommendations to multinational enterprises operating in or from OECD countries, including Aotearoa New Zealand. They provide non-binding principles and standards for responsible business conduct in a global context.
- The **UNGPs on Business and Human Rights** are a further set of internationally recognised guidelines committing companies to respect human rights, including by preventing, addressing and remedying human rights impacts from their business operations.

In adopting the UNGPs and OECD Guidelines as frameworks for our business conduct, Ravensdown is committing to international standards of responsible business conduct.

Ravensdown's focus, as set out above, is also consistent with the expectations of the International Labour Organisation (ILO) and the Ethical Trading Initiative.

Ravensdown is committed to doing business with suppliers that have a strong commitment to ethical standards regarding business conduct, workplace health and safety, sustainability and environmental protection, human rights, and fair pay and conditions. These expectations are set out in our **Supplier Code of Conduct**.

In accordance with the UNGPs, we commit to addressing any adverse human rights impacts that are caused or contributed to by our business. We encourage our communities, our people and our suppliers to raise any human rights concerns with us via the appropriate grievance channels set out at page 16.

Ravensdown is an integral part of Aotearoa New Zealand's agricultural sector.



## Our commitment to a diverse, flexible and respectful workforce

### *Diversity*

Ravensdown is committed to developing and celebrating a diverse and empowered workforce as outlined in our **Diversity, Inclusion and Belonging Policy**. We value and understand the importance of an inclusive workplace with diversity of thought, opinion and background. We aim to promote and sustain a sense of belonging by valuing and respecting the talents, beliefs, backgrounds and ways of living of all employees, candidates, customers and suppliers. To achieve this, we strive to provide a work environment in which every employee is treated fairly and with respect, and has the opportunity to realise their potential and to contribute to business success.

### *Flexibility*

Ravensdown recognises the need for our employees to balance work life and personal life in order to live happy, healthy and fulfilling lives. We build flexibility into work wherever we can, so that work commitments can sit alongside these external commitments. Our **Flexible Working Policy** outlines to employees how we can support flexible working and allow our people to thrive at work and at home.

### *Respect and non-discrimination*

Ravensdown prohibits discrimination against employees, shareholders, directors, officers, customers and suppliers on account of race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation or family responsibilities. We commit to treating everyone with dignity and respect and ensuring that no-one is unreasonably interfered with in the conduct of their duties and responsibilities. We treat people equally, whether they are an employee, supplier, customer or other stakeholder.

Employment and development opportunities and promotion at Ravensdown are merit-driven. Employees and applicants for employment will be evaluated according to their job-related skills, qualifications, abilities and aptitudes. Decisions based on attributes unrelated to job performance constitute unlawful discrimination and are prohibited.

## *Anti-harassment / anti-workplace bullying*

Ravensdown does not tolerate any form of harassment. Our people are the foundation of our success, and all our people must be treated fairly, and with respect and dignity.

We consider that harassment and bullying includes behaviour that a reasonable person would find unwelcome, humiliating, undermining, intimidating or offensive.

Employees must never engage in actions or behaviours that entail harassment or bullying. Our **Anti-Bullying and Harassment Prevention Policy** makes it clear that the company will take disciplinary action where harassment has occurred.

## Our commitment to fair and equal compensation

Ravensdown compensates employees competitively, relative to the industry and local labour market. Working hours, wages and benefits are consistent with laws and industry standards, including minimum wages, overtime, other elements of compensation, and legally mandated benefits. Ravensdown has committed to paying all permanent and fixed term employees the Living Wage and is committed to pay equity.

## Freedom of association

Ravensdown respects our employees' freedom of association and supports their right to establish, join or not join trade unions without coercion or fear of reprisal, intimidation or harassment. We recognise the right of our people to bargain collectively. We aim to ensure that trade union membership remains a matter of personal choice and we do not discriminate between our people based on their membership or lack of membership of a trade union.

## Conflicts of interest

Conflicts of interest may impact on our ability to conduct business with integrity and impartiality. A conflict of interest arises when an employee is in a decision-making position and participates in an activity or acquires another interest or loyalty that jeopardises, or could jeopardise, his or her judgement, objectivity or independence.

At Ravensdown, all of our employees must comply with our **Conflict of Interest Policy** and make declarations of a conflict as appropriate. All directors and employees are required to disclose all actual or perceived conflicts of interest between their personal interests and the interests of Ravensdown and its stakeholders. Our directors comply with their duties in relation to conflicts of interest under the Companies Act 1993.



## Information Privacy

As outlined in our Privacy Policies, at Ravensdown we take our obligations regarding personal information seriously. In order to provide products and services to the best of our ability, we collect a range of personal information from different people. However, we only collect and retain personal information as necessary to meet business requirements, and as permitted by law in places where we operate. We do not share information with third parties, except as outlined in our Privacy Policies. Information is not used or disclosed for any purpose other than the purpose for which it is collected.

In addition to our **External Privacy Policy**, our employees are required to familiarise themselves with our **Privacy Guidelines** to ensure compliance with many of the information privacy principles contained in the Privacy Act 2020. Our **Internal Privacy Policy** identifies our Privacy Officer, who is responsible for ensuring compliance with information privacy principles and outlining our privacy breach protocol.

## Confidential Information

As part of our business, we access non-personal confidential information of our customers, suppliers and business partners. This includes trade secrets, pricing figures, new product and/or marketing plans, research and development information, and manufacturing processes. We do not disclose this information unless there is a valid legal or business requirement. Our employees are obliged by contract to keep this information confidential, including after their employment at Ravensdown ends.

In line with our internal **IT Acceptable Use Policy**, employees must also protect any Ravensdown IT equipment from any kind of unauthorised access. Employees are also prohibited from using Ravensdown systems (including email, instant messaging, the internet or intranet) for any unprofessional, unlawful or harmful purpose.





## HEALTH, SAFETY AND WELLBEING

Ravensdown is committed to achieving leading industry practice on health, safety and wellbeing, including meeting and/or exceeding legal requirements. We believe that all accidents and occupational illnesses and injuries are preventable.

### Safety and Wellbeing Strategic Plan

Our Safety and Wellbeing Strategic Plan has three key pillars – visible leadership, critical risk management and simplified systems and assurance. We strive to ensure there is a clear implementation plan for each of the key pillars, and that it is understood and supported across all parts of the business. Key metrics are in place to support visibility of performance against each of these pillars and a strong culture of reporting hazards and incidents is encouraged. These metrics are regularly reported to the leadership team and Board.

Our board, through its Charter, commits to exercising due diligence as officers under the Health and Safety at Work Act 2015 to understand Ravensdown's operations and safety and wellbeing risks. This includes taking all reasonable steps to:

- acquire, and keep up to date with, knowledge of work safety and wellbeing matters;
- gain an understanding of the nature of the operations of the business carried out by Ravensdown, and the hazards and risks generally associated with those operations;





We are continuing our focus on mental wellbeing by treating this as a critical risk.

- ensure that Ravensdown has available for use, and uses, appropriate resources and processes to eliminate or minimise those risks to safety and wellbeing from work carried out as part of the conduct of the business;
- ensure Ravensdown has appropriate processes for receiving and considering information regarding incidents, hazards, and risks, and for responding to that information in a timely way;
- ensure Ravensdown has, and implements, processes for complying with its duties and obligations under the Act; and
- verify that these resources and processes are in place and being used.

### Safety and Wellbeing Policy

Ravensdown's **Safety and Wellbeing Policy** applies to all our directors and employees. Managers are accountable for the implementation of the standards reflected in the Policy, and for ensuring that supporting systems are in place.

Safe operations depend not only on the plant and equipment being technically sound, but also on all of our people taking responsibility for preventing workplace-related injuries and illnesses and complying with our health and safety procedures. We ensure that all employees receive regular health and safety training, including in the handling of hazardous materials and the prevention of accidents, and expect the same of our suppliers through our Supplier Code of Conduct.

We are continuing our focus on mental wellbeing by treating this as a critical risk. We provide training to help our people cope with stress and uncertainty in challenging times, and to help our managers identify and manage mental illness challenges in their teams.

Ravensdown uses modern incident management software to record, analyse and respond to environmental hazards and events and health and safety events.





## SUPPLIER INTEGRITY

### Supplier Code of Conduct

Our **Supplier Code of Conduct** sets out our expectation of our suppliers to have similar values and expectations to those set out in this Code. As above, we are committed to doing business with suppliers who have aligned values and a strong commitment to ethical standards. We require our suppliers to comply with minimum standards of business conduct, respect for human rights and environmental stewardship.

### Prohibition on modern slavery

Ravensdown prohibits all forms of forced labour, bonded labour, and child labour. We prohibit the use of actions that may be contrary to national laws or international obligations including minimum ILO standards – such as physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse.

We prohibit any form of child labour across our supply chains, including work that deprives children of their childhood, their potential and their dignity. Through our Supplier Code of Conduct, we require our suppliers to adhere to the minimum employment age limit defined by national laws or regulations, and to comply with ILO Conventions on child labour. We support our customers, suppliers and other business partners to protect against the exploitation of children.

## ENVIRONMENTAL STEWARDSHIP

### Our commitment to the environment

As an Aotearoa New Zealand business that operates internationally we are committed to minimising our environmental footprint. We constantly seek to improve the environmental outcomes of our own activities, including the footprint of our operations and supply chains.

We seek to prevent pollution and loss of biodiversity by ascribing value to natural capital and assessing the impact of our activities. Where we are able we work collaboratively with our stakeholders to promote restoration of natural habitats.

#### *Reducing our shareholders' environmental impact*

We have an important leadership role driving sustainable agriculture and our contribution to helping shareholders reduce their environmental impact has never been so important. We engage openly and honestly with our stakeholders to understand their needs and expectations and to promote responsible use and management of our products. We are committed to supplying the right amount of farm nutrients to our customer-owners, so they can be applied at the right time and in the right place. We also support our shareholders to meet environmental regulations through delivery of robust technical advice.

#### *Reducing our environmental impact*

In accordance with our **Environmental Policy**, we work to reduce our emissions and discharges, to improve our environment footprint from manufacturing and supply and we consider carbon reduction targets in key commercial decision-making. We are focussed on identifying, assessing and managing environmental risks. We have been tracking and reporting on the environmental performance of our operations for 20 years using consistent measures to identify trends and continually improve our practices. Key updates on our environmental performance and areas of focus are reported in our Integrated Report. We also monitor compliance with our own **Environmental Policy**.

#### *Supplier expectations*

Supplier environmental expectations are laid out in our Supplier Code of Conduct – covering environmental standards, waste, pollution prevention and resource efficiency.

#### *Improving our infrastructure*

Our infrastructure upgrades focus on reducing environmental impact and improving efficiency. A formal sustainability assessment is undertaken on all major construction projects to minimise risk and improve project delivery. Improving the quality of discharges to air and water from our sites is an ongoing priority. Improvements to air discharges may include upgrades to manufacturing discharge stacks and installation of dust curtains in stores. Reducing the risk of nutrients becoming entrained in stormwater may include sealing road surfaces, installing electric rapid doors and enclosing dispatch areas.

### Our commitment to reducing climate change

We recognise that climate change is a significant global threat, and that we have an important role to play in reducing greenhouse gas emissions. We are active members of New Zealand's Sustainable Business Council and Climate Leaders' Coalition, and meet their requirements annually. We are also a shareholder in AgriZero, the joint venture between leading agri-business companies and the Government, which has set up to accelerate the research, development, and commercialisation of tools and technology to reduce agricultural emissions.

We identify and assess transitional and physical climate-related risks to our business on a systematic basis following the guidance of the Taskforce on Climate-related Financial Disclosure. We engage frequently with Government to ensure that its climate change response meets the needs of industry, our shareholders and future generations.

We have a target of reducing our greenhouse gas (GHG) emissions for scope 1 and 2 by 50% of 2018 levels by 2030; and scope 3 by 50% by 2035. Our focus is on reducing reliance on fossil fuels, efficient processes, working closely with our suppliers, enhancement of native forests and tools and technologies to reduce fertiliser-related GHG emissions. We report annually in our Integrated Report on scope 1, 2 and 3 emissions (including GHG losses on farm direct from fertiliser). Emissions reduction achievements and consideration of climate risk are also reported in our Integrated Report.



## COMMUNITY

### Our commitment to conduct business fairly

Ravensdown strives to operate as a fair and responsible business, recognising that our success depends on the continued support of our customers and our investors. We conduct business fairly, honestly and transparently. We adhere to high ethical standards and promote compliance with relevant competition and consumer laws.

#### *Fairness to stakeholders*

We are committed to open dialogue with our stakeholders. We are willing to listen to key issues affecting different stakeholder groups and to commit where appropriate to work through these issues. We communicate with national and international authorities, professional bodies and other organisations about our operating practices. We maintain dialogue with our customers to ensure we meet their needs and capacity. We charge fairly for our products and services.

Ravensdown's purchasing decisions take into account commercially competitive factors such as price, quality and reliability, as well as the ethical standards of our suppliers. Ravensdown expects suppliers to align with our values and strong commitment to ethical standards regarding business conduct, workplace health and safety, environmental protection, human rights, fair pay and conditions and economic sustainability, as set out in our Supplier Code of Conduct..

#### *Transparent reporting*

We are committed to integrated reporting, to explain to all stakeholders how we create value in the short, medium and long term; and how we eliminate, mitigate, and/or reduce the erosion of value over time.



#### *Anti-bribery / Gifts*

Our people are required to exercise the utmost care in order to protect our reputation against allegations of improper behaviour and to ensure that anti-corruption laws are not breached. Employees are required to declare all gifts received that have a value over \$300 in accordance with Ravensdown's **Conflict of Interest Policy**, and to follow the guidance provided in our **Voucher Policy**.

Most countries have laws prohibiting making offers or payments and giving gifts or other things of value to government officials to influence their actions. Many countries also extend these prohibitions to cover bribes to private parties, as well as bribes to government officials. In keeping with these laws, Ravensdown prohibits authorising, offering, giving or promising anything of value directly or indirectly (via a business partner) to a government official to influence official action or to anyone to induce them to perform their work disloyally or otherwise improperly.





### *Competition and antitrust*

Ravensdown supports free and open competition. We are committed to fully complying with competition laws, actively engaging and co-operating with competition authorities. We conduct business in a manner that does not breach competition laws in all our dealings with competitors, joint venture partners, customers, suppliers, business partners and other third parties.

### *Fraud and corruption*

Our **Legislative Compliance Guidelines** set out the company's process to ensure legal compliance by the company is its day to day operation, including ensuring that our products comply with New Zealand animal welfare, environmental and safety standards (as appropriate). Ravensdown has a philosophy of "zero tolerance" towards fraud, both inside and outside the company. This means that it will not tolerate any form of unlawful or criminal conduct, including bribery and corruption. Our **Fraud Management Policy** provides guidance on how to deal with suspected fraud in the company, for the protection of all stakeholders.

A breach of anti-corruption laws is a serious offence, which can result in fines for both Ravensdown and employees and the imprisonment of employees. Even the appearance of a breach of these laws can have a serious reputational impact.

### *International sanctions*

We acknowledge that Ravensdown engages in international trading that may be subject to international export control treaties, international and/or domestic sanctions, and/or domestic government policies and regulations. We comply with all applicable national and international laws, regulations and restrictions relating to the movement of materials and services around the world, and we ensure that our transactions comply with all applicable rules restricting or prohibiting dealings with sanctioned countries.





### **Our commitment to contribute to community, social and economic development**

Ravensdown's ability to build relationships and work collaboratively and transparently with the communities where we operate is critical to our long-term success. We understand that our business can impact local communities both positively and negatively. We appreciate our social licence to operate and continually seek ways to better care for local communities while making a positive contribution – for example through employment and sustainable agriculture – to regional and national economic development.

#### ***Community engagement***

Our aim is to be valued and respected by the communities in which we operate. Our manufacturing sites are required to have stakeholder engagement plans, which identify stakeholders, their interests and relationships and methodologies for open communication. We engage with communities, neighbours and tangata whenua to understand our actual and potential impacts on these parties, and to identify and address their concerns. We take their views and concerns into account in our decision-making.

Examples of our community engagement practices include:

- undergoing formal site-specific engagement with communities surrounding our operations;
- conducting community based surveys to measure our environmental performance against regulations;
- engaging with community groups and schools where possible, including supporting fundraising and programmes;
- investing in social development – including employment, investment, development and learning opportunities;
- responding to incidents and complaints quickly and responsibly;
- upholding a positive transparent relationship with stakeholders; and
- respecting cultural views.





### *Community practice*

Everyone covered by this Code is expected to implement and abide by relevant policies, practices and procedures with the objective of minimising harm to the environment and the communities in which we operate.

In all cases, community development projects and donations are approved in accordance with applicable Ravensdown requirements and operate according to documented, approved and transparent assessment procedures.

### **Our commitment to uphold the principles of Te Tiriti o Waitangi**

Ravensdown recognises the significance of Te Tiriti o Waitangi and the existence of rights, values and worldviews that are specifically relevant to Māori. We greatly value the iwi relationships that enable our business to operate and endeavour to operate in a manner that is consistent with the principles of Te Tiriti in all parts of our business. In the past we have engaged with affected iwi during consent renewal processes.

We provide voluntary training on Te Tiriti and Te Reo Māori for all Ravensdown employees, and are building our understanding of and focus on Te Ao Māori across the business.





# Ravensdown is committed to being a transparent and accountable organisation

## ACCOUNTABILITY

### Our expectations of compliance with this Code

The Board has approved this Code and considers reports dealing with compliance. Our General Counsel, with the assistance of the Risk and Assurance Manager, is responsible for recording and evaluating compliance with the Code and reporting on all breaches to the Board.

The Chief Executive Officer is responsible to the Board for the ethics and culture of Ravensdown. Leaders and people managers support the Chief Executive Officer in upholding this high standard of business conduct.

All Ravensdown employees are encouraged, and have the responsibility, to report any known or suspected incidents of wrongdoing or breaches of this Code. Management are accountable for ensuring all employees understand their responsibilities under this Code and to provide appropriate training. Leaders across the business are required to take all reasonable steps to ensure that the people for whom they are responsible are aware of and uphold the behaviours outlined in this Code.





### How to raise a concern

Internal and external stakeholders are encouraged to raise any concerns via:

- managers within Ravensdown, or directly to the Chief Executive Officer [ceo@ravensdown.co.nz](mailto:ceo@ravensdown.co.nz); or
- our 24/7 independent anonymous Ethics Hotline (operated by Report-it-Now).
- The website address to access Report It Now is: <https://ethicspro.reportitnow-global.com>
- The Report It Now Hotline can be accessed by the toll-free number, 0800 225 378 (0800 2 ALERT)
- Or text your number to 022 077 3740 and Report It Now will call you back

Employees responding to business conduct concerns are obliged to:

- treat all concerns seriously and, as far as possible, in confidence;
- respond to issues raised in a prompt and professional way, taking into account Ravensdown policies, procedures and other requirements; and
- provide accurate information and advice consistent with this Code, or seek the advice of experts with the right knowledge and objectivity.

Where, following an inquiry, Ravensdown is satisfied that a breach has occurred, the nature of any disciplinary or other action is determined by relevant management, in consultation with other appropriate sources of advice.

The nature of any action will depend on the seriousness of the breach and other relevant circumstances. If the situation involves a violation of law, the matter may also be referred to the appropriate law enforcement authorities for consideration.

In addition to failing to comply with required Ravensdown behaviours, misconduct that may result in discipline includes:

- requesting others to breach Ravensdown-mandated behaviour;
- failing to raise promptly known or suspected breaches of Ravensdown policies or procedures;
- failing to cooperate in investigations of possible breaches regarding your own behaviour;
- retaliation against another person for reporting a business conduct concern; or
- failing to demonstrate leadership and diligence to ensure compliance with Ravensdown behaviour and the law.

### Protected disclosures

Ravensdown is committed to being a transparent and accountable organisation in compliance with the Protected Disclosures (Protection of Whistleblowers) Act 2022. All Ravensdown employees are encouraged, and have the responsibility, to report any known or suspected incidents of serious wrongdoing within the company. We are committed to the protection of genuine whistle-blowers against action taken in reprisal. Our internal **Protected Disclosures Policy** outlines this commitment in more detail.

### Approved by the board.



 **ravensdown**