

## MB Code of Conduct

### Mission and Values of the Business

Mountain Blue's (MB's) mission is to be the global leader in the production of the finest blueberry fruit and varieties. Through the pursuit of excellence, we operate in an ethical and sustainable manner.

MB is a family owned and operated company that was established in 1978. We aim to produce the highest quality blueberry fruit and genetics, along with an extensive nursery and marketing service. MB works to provide domestic and international customers with a consistent supply of quality products through a combination of its own production and our network of growers.

We seek to be sustainable through innovative production practices, mechanization, and variety improvements. We are a people focused company that affords our team a secure and meaningful environment, whilst providing a platform to give back to the local and international communities we operate in.

### Purpose

Our Code of Conduct applies to all workers and provides the framework of principles for conducting business, dealing with other workers, customers/clients and suppliers. A **worker** is a person who carries out work in any capacity for a business or employer or 'person conducting a business undertaking'. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence.

MB expects our workers to maintain a high standard of integrity and professionalism; practising honesty in all situations. We require that our workers are considerate and respectful of the environment and others, including portraying a positive attitude and outlook within the work environment.

MB workers will aim to exercise fairness, equality, courtesy, consideration and sensitivity in dealing with all shareholders; including other workers, customers/clients and suppliers; ensuring to avoid apparent conflict of interests and promptly disclosing any interest which may constitute a conflict of interest including disclosing romantic relationships between one worker and another. Disclosed relationships will be kept confidential and the information used only to monitor for these conflicts.

Workers must abide by instructions, policies, procedures and lawful directions that relate to your employment with MB and/or our customers/clients. All risks, hazards, incidents and injuries are to be reported as soon as possible, to the department manager or next relevant person. All breaches to the above are consequent to disciplinary action up to and including termination of employment.

Any worker, who in good faith, raises a complaint or discloses an alleged breach, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.

Workers representing MB must ensure they are acting in the best interest of the company at all this; including representing MB outside of the workplace and only with direct management approval to do so.

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## MB Ethical Sourcing Policy

MB aims to act in an ethical, responsible and sustainable manner. In order to do this, we follow the below standards for our operations in order to ensure we are doing the right thing by our workers, our customers and partners, and the community that we operate within. To do this, we must also enlist the same standards for our suppliers.

1. Forced/Bonded Labour
  - 1.1 MB will not use Forced, Bonded or Involuntary Labour.
  - 1.2 Employment must be freely chosen.
  - 1.3 Workers must not be required to lodge deposits or identity papers with MB.
  - 1.4 Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.
  
2. Child Labour
  - 2.1 MB will not use child labour. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential, or that is harmful to their physical and mental development.
  - 2.2 MB will verify the age of all workers to ensure no child labour is used. MB refers to the International Labour Organization's Minimum Age Convention, 1973 (No. 138), where the minimum age for work is defined as being; the age for finishing compulsory schooling, and in any case not less than 15 years of age.
  
3. Illegal Labour
  - 3.1 MB will not use Illegal Labour.
  - 3.2 MB will verify the legal entitlement of their workers to work in the country of employment.
  
4. Harsh or Inhumane Treatment
  - 4.1 Physical abuse or physical discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.
  
5. Business Integrity
  - 5.1 MB will engage in professional business ethics in all dealings and provide transparent documentation and records.
  - 5.2 Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.
  
6. Wages and Benefits
  - 6.1 MB will pay workers for wages and benefits that meet a minimum national or industry standards, whichever is the higher. In any event, wages will be enough to meet basic needs and to provide some discretionary income.
  - 6.2 All workers must be provided with written and understandable information about their employment conditions in respect to wages, before they enter employment, and about the particulars of their wages for the pay period concerned each time that are paid.
  - 6.3 Deductions from wages may only occur with the express written permission of the worker concerned.
  - 6.4 Deductions from wages for disciplinary measures are not permitted.
  
7. Working Hours
  - 7.1 Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 60 hours per week.
  - 7.2 Workers must have at least one day off in 7 days or two days off in every 14 days.
  - 7.3 Overtime must be voluntary and compensated as prescribed by local laws.
  - 7.4 Record keeping on hours worked must be accurate, complete and transparent at all times.
  
8. Freedom of Association
  - 8.1 MB acknowledge that workers have a right to freedom of association and to bargain collectively.
  - 8.2 Workers have a right to join or form trade unions of their choosing. MB adopts an open attitude towards the activities of trade unions and their organisation activities.
  - 8.3 Where the right to freedom of association and collective bargaining are restricted under local laws, MB will not

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hinder the development of alternative means of independent and free association and bargaining.

9. Sub-Contracting and Supply Chain

- 9.1 There must be no sub-contracting unless documented including but not limited to records of subcontractors' names and locations. MB considers sub-contracting to mean:
- i) Sites contracted by MB's direct suppliers to produce product in its final form for retail sale, packed in the retail unit, or produced in bulk in final form for retail packing elsewhere, or received in bulk final form for retail packing.
  - ii) Sites that significantly contribute to the final form of the product.
- 9.2 MB will ensure that sub-contractors operate in accordance with applicable laws, regulations and the MB Ethical Sourcing Policy and Procedure.

10. Safe Working Conditions

- 10.1 Plant and systems of work which are safe and without risk to health will be provided.
- 10.2 MB will provide workers with a safe and clean working environment taking into consideration the prevailing knowledge of the industry and of any specific hazards.
- 10.3 Workers must receive adequate, recorded training to perform their jobs in a safe manner.
- 10.4 Personal protective equipment must be supplied and workers trained in its use.
- 10.5 Safeguards on machinery must meet or exceed local laws.
- 10.6 Where MB provides worker accommodation, it will be clean, safe and meet the basic needs of workers.
- 10.7 Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

11. Discrimination

- 11.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

12. Regular Employment

- 12.1 To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.
- 12.2 Workers who have a regular employment relationship with their employer are afforded a number of obligations from their employer relating to labour and social security laws and regulations. These obligations shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements, fixed term contracts or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

13. Environment

- 13.1 MB complies with local and national environmental laws and regulations.
- 13.2 MB uses reasonable endeavours to comply with international standards on environmental protection.

14. Documentation and Policies

- 14.1 MB regularly reviews and updates documentation and policies to ensure effective ethical management practices.
- 14.2 MB regularly trains employees on documentation and policies.

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