



Murray Irrigation

CODE OF CONDUCT

JUNE 2025

POLI-03-08-01

www.murrayirrigation.com.au

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1 Purpose

The purpose of this Code is to:

- set out Murray Irrigation's expectations and requirements of its staff when performing work for or on behalf of Murray Irrigation; and
- provide guidance to staff to ensure that their decisions and actions are ethical, lawful and appropriate.

Applying this Code will strengthen and protect our dealings with other staff, individuals, customers, contractors and businesses while reinforcing the governance standards and reputation of Murray Irrigation.

1.1 Who does this Code apply to?

This Code of Conduct applies to:

- Murray Irrigation employees;
- Contractor or consultants engaged by Murray Irrigation to perform work for or on behalf of Murray Irrigation;
- Murray Irrigation volunteers;
- Directors of Murray Irrigation; and
- Director Nominee.

Throughout this Code, the above persons are collectively referred to as 'staff'.

Staff are required to review and familiarise themselves with the requirements of this Code, including as updated from time to time.

1.2 When does this Code apply?

This Code applies to staff when dealing with people in the course of, or in connection with, work performed for or on behalf of Murray Irrigation. This includes dealings that occur remotely or in person, verbally, in writing, or electronically, including conversation, email, telephone, social media and instant messaging.

2 Our Values

The requirements of this Code are necessary to demonstrate Murray Irrigation's values to situations that may arise in working for or on behalf of Murray Irrigation.

Our core values are:

1. **Wellness and Safety** – *The wellbeing and safety of our staff and customers are of paramount importance.*

We will:

- Embed wellbeing and safety across the business from on-boarding through to regular training and awareness programs;
- Look out for and support one another to be the best they can be;
- Empower staff to speak up without fear or favour.

2. **Accountability** – *We will be accountable, transparent and ethical in everything we do.*

We will:

- Demonstrate honesty and transparency in our information and decision making;
- Deliver on promises to customers, staff and businesses;
- Take ownership of our own behaviour, mistakes and performance outcomes.

3. **Teamwork** – *Teamwork will empower performance to achieve objectives.*

Teams will:

- Interact across the business sharing knowledge, information and skills to reach outcomes;
- Work collaboratively across the business to achieve outcomes;
- Have clear objectives aligned with business outcomes.

4. **Embrace Change** – *Support and encourage innovation to meet our evolving needs.*

We will:

- Be proactive in our willingness to change through continuous improvement;
- Encourage staff to initiate change to create efficiencies and achieve business goals.

5. **Respect** – *Create positive relationship through mutual respect between Murray Irrigation and the customer.*

We will:

- Respect the value of people and the contribution that their diverse perspectives bring to our organisation;
- Respect our customers by offering proactive and excellent service – every time;
- Respect and value those we work with through the contribution they make.

Staff are required to act consistently with these values at all times.

3 Behaving Ethically

Staff are critical in assisting Murray Irrigation to achieve its objectives. In doing so, staff must perform their roles ethically and fairly.

3.1 Avoiding conflicts of interest

A conflict of interest is a conflict between a staff member's personal interests and their duties to, or the interests of, Murray Irrigation and that gives, may give or could be perceived to give, an advantage to the staff member or those who are associated with that staff member.

A **personal interest** can be financial or non-financial.

- A **financial interest** is an interest where a staff member or their relative or close associates stands to gain or lose financially from the activities of Murray Irrigation. This can include, but is not limited to, having a shareholding in Murray Irrigation or any financial interest in a business that is tendering for work from Murray Irrigation.
- A **non-financial interest** is an interest such as a friendship, close personal relationship, animosity or other personal involvement with another person or group where favouritism or prejudice may arise.

Examples of conflict of interest include:

- Awarding contracts to, or employing, friends or family;
- Making decisions that are primarily motivated by factors unrelated to the interests and business of Murray Irrigation;
- Being involved in any Murray Irrigation procurement process or decision making which could benefit a business or service in which the staff member has a personal interest.
- Being involved in any other activity that could jeopardise or be perceived as jeopardising the staff member's judgement, objectivity, impartiality or independence when performing work for Murray Irrigation.

Staff must not act with an actual, potential or perceived conflict of interest.

If there is a reasonable basis to believe that a conflict of interest could arise or could be perceived to arise, staff must:

- Promptly advise the Company Secretary in writing of the interest; or
- In the case of personal relationships, discuss the details of the interest with HR; or Promptly excuse themselves from any decision-making process where they have an interest that influences, or may be perceived as influencing, their ability to make an objective decision and to fulfil their duties to Murray Irrigation.

3.2 Appropriate use of position

Staff must always use the responsibilities of their position honestly, in good faith and in the interests of Murray Irrigation. In doing so, staff must:

- make decisions in good faith and for a proper purpose.
- ensure they are reasonably informed about the subject matter of the decision; and

- ensure that they believe on a rational basis that the decision is in the best interests of Murray Irrigation.

Staff must not:

- show any favour towards friends, associates, or relatives in dealings with or on behalf of Murray Irrigation or misuse their position in any other way; or
- receive payment or other benefits for activities outside of Murray Irrigation, which are offered to staff because of their position at Murray Irrigation.

3.3 No bribery and restrictions on gifts and hospitality

Murray Irrigation prohibits staff from giving, receiving, offering, promising, requesting or authorising a bribe. A bribe is anything of value for the purpose of inducing or rewarding an action or exercise of influence, and may include cash, gifts, hospitality, personal/family/social favours.

Generally, an exchange of gifts or hospitality may compromise, or appear to compromise, the objective exercise of staff duties and could be unlawful. However, staff may receive a gift (an item) or hospitality (e.g. food, travel or accommodation) that is valued at or has a recommended retail value of \$100 or less.

Gifts

Where a staff member receives a gift that has a recommended retail value of greater than \$100, the staff member must attempt to refuse or return the gift.

If the attempt is unsuccessful, staff in receipt of the gift must immediately disclose the gift to their General Manager or the Company Secretary to determine appropriate action.

Hospitality

Where a staff member is offered hospitality of any type, staff must not accept the hospitality until they have:

- first acquired the reasonable value of the hospitality; and
- having done so, is reasonably satisfied that the value of the hospitality is \$100 or less.

3.4 Outside employment or involvement in other business

Staff must not, without prior written consent from the Chief Executive Officer, engage in other employment or business activities (whether paid or unpaid) which may create a conflict of interest with, or impact on, their duties to Murray Irrigation, or which are offered to staff as a result of their existing position at Murray Irrigation.

The types of employment or business activities that may create a conflict of interest or otherwise impact the performance of the staff member's duties to Murray Irrigation include, but is not limited to the following:

- Performing work for, with or on behalf of (be it as an employee, volunteer, director or contract), a competitor of Murray Irrigation;
- Unless permitted by the Murray Irrigation Constitution, performing work for, with or on behalf of, a shareholder of Murray Irrigation;
- Being involved in a business that is providing goods or services to, or tendering to provide goods or services to, Murray Irrigation;
- Performing work for another entity while on duty for Murray Irrigation.

If in doubt about whether the outside employment or business activity conflicts with the staff member's duties to Murray Irrigation, staff must discuss the matter with the Chief Executive Officer prior to acting on the outside employment or business activity and obtain the Chief Executive Officer's written consent.

3.5 Media or public comment

Staff must not make comment, whether 'on the record' or 'off the record' to the media unless expressly authorised by Murray Irrigation to do so.

Were media enquiries are received, staff must refer those enquiries to the Murray Irrigation media team – media@murrayirrigation.com.au.

Comments about colleagues, managers, executives, directors, or staff experiences at work and opinions about the workplace can have the potential to adversely affect those persons and/or Murray Irrigation. Staff **must not** publish, including on social media, or make any public comment that could potentially damage the reputation of Murray Irrigation or its staff, or which would otherwise breach this Code.

4 Behaving Professionally

Murray Irrigation is committed to harnessing a culture of integrity and respect, and providing a working environment that is safe and healthy for all staff.

As part of this commitment, Murray Irrigation requires staff to adhere to the highest standard of professional behaviour in the workplace.

4.1 Required behaviours

Staff **must**:

- comply with all relevant laws, policies and procedures including the contents of this Code;
- report concerns in accordance with the Internal Complaints Resolution Procedure when they believe they have witnessed or experienced behaviours that breach this Code. Staff are encouraged to report without fear of reprisal;
- participate in any complaints resolution process as required.

Staff **must not**:

- use obscene, abusive or disrespectful language at, about or around, others, whether verbally or in writing;
- send, view or procure materials or messages that contain content that is offensive, disrespectful, abusive or unlawful. This includes content that contains:
 - pornographic or degrading images;
 - violent or threatening images; and/or
 - racially offensive or sexist images or materials.
- engage in unacceptable behaviour such as discrimination, harassment, bullying, violence, vilification and victimisation. This includes, but is not limited to, any behaviour which is, or is reasonably perceived as:
 - attacking or threatening (physically, psychologically or sexually);
 - offensive or insulting, including when masquerading it as a joke irrespective of the intention behind the joke/comment;
 - intimidating or aggressive;
 - adversely impacting on the wellbeing or safety of staff or customers of Murray Irrigation; or
 - causing damage to Murray Irrigation's reputation or property.

4.2 What is bullying?

Staff must not engage in conduct that is bullying.

Workplace bullying is repeated unreasonable behaviour directed towards another person or group of persons in the workplace that creates a risk to health and safety.

Bullying can be verbal, physical, social or psychological abuse. It includes offensive language, insulting someone about physical characteristics such as their weight or height, teasing or telling jokes, hitting/hurting someone, shoving or intimidating another person, consistently excluding or isolating another person e.g. from work related activities. Bullying can be unlawful even if there is no intent to bully.

Repeated unreasonable behaviour may include (but is not limited to):

- spreading misinformation or malicious rumours;
- behaviour or language that frightens, humiliates, belittles or degrades at work, including yelling or screaming;
- teasing or regularly making someone the subject of pranks or practical jokes;
- deliberately excluding, isolating or marginalising a person from work-related activities;
- withholding information that is vital for effective work performance; and
- deliberately changing work arrangements, such as rosters and leave, to inconvenience a person.

Example

A staff member is feeling intimidated and frustrated by their supervisor because their supervisor, without explanation, often blocks the staff member's applications for leave. The supervisor also consistently belittle the staff member in front of others in the workplace, often make jokes about them in front of colleagues and forgets to include them in invitations to team meetings.

4.3 What is not bullying?

Reasonable Management Action

Murray Irrigation expects supervisors/managers to take objectively reasonable management action in a reasonable way to effectively direct and control the way that work is carried out by staff and to assess and improve the quality, efficiency and accuracy of work performed.

Examples of reasonable management action may include, but is not limited to:

- a supervisor giving fair and constructive performance feedback to staff, notwithstanding that such feedback may be upsetting to the staff member;
- setting reasonable performance goals, standards and deadlines;
- directing and controlling the way your work is carried out;
- addressing poor performance;
- commencing a process under the Complaint Resolution Procedure for alleged breaches of this Code;
- taking disciplinary action;
- refusing to permit a staff member to return to work for safety reasons;
- any workplace decisions, such as those concerning work location, rosters, leave, training, promotion, allocation of work that are made objectively and consistent with any relevant agreements and/or guidance;
- any other lawful decision;

Whether the management action is reasonable is to be determined objectively, not from the recipient's perception of it. Generally, the management action will be reasonable if it is lawful and despite the fact that it may not have been perfectly executed. That is to say, whilst some steps taken may have been unreasonable, if overall the action taken was objectively reasonable then it will likely be considered reasonable management action.

Example

A new supervisor provided feedback to a staff member that a document they prepared was not meeting requirements. The staff member was upset because the document was the same type as what they had previously submitted under their former supervisor, and they had received positive feedback from their former supervisor.

The new supervisor's conduct is reasonable management action because a new supervisor is able to address a staff member's work requirements/outputs if they have different expectations.

Grievances

Differences of opinion and disagreements between staff, for example as to how work should be performed, are generally not workplace bullying. Staff may have differences or disagreements in the workplace without bullying occurring.

4.4 What is discrimination?

Staff must not engage in unlawful discrimination.

Unlawful discrimination is treating a person, or group of people, less favourably than another person, or group of people, because that person, or group, has an attribute that is protected by law.

The attributes protected from discrimination include the following:

| | | |
|---|--|--|
| <ul style="list-style-type: none"> age | <ul style="list-style-type: none"> gender identity | <ul style="list-style-type: none"> people with disabilities who have a carer, assistance, assistance animal or disability aid |
| <ul style="list-style-type: none"> breastfeeding | <ul style="list-style-type: none"> intersex status | <ul style="list-style-type: none"> Race, colour, descent or national or ethnic origin |
| <ul style="list-style-type: none"> disability | <ul style="list-style-type: none"> marital or relationship status | <ul style="list-style-type: none"> sex |

| | | |
|---|--|--|
| <ul style="list-style-type: none"> sexual activity/sexual preference | <ul style="list-style-type: none"> union activity | <ul style="list-style-type: none"> political views |
| <ul style="list-style-type: none"> family responsibilities | <ul style="list-style-type: none"> pregnancy or potential pregnancy | <ul style="list-style-type: none"> religious belief or activity |

Unlawful discrimination can be classified as either '**direct**' (specific action directed to the individual or group) or '**indirect**' (an outcome of a general rule, policy or procedure that adversely impacts all members of a particular group or an individual).

Direct discrimination can happen because people make unfair assumptions about what a person with a protected attribute can or cannot do.

Example

A staff member applies for a promotion to another position internally. His application is not accepted. When he asks the hiring manager why he didn't get the job, the hiring manager states: "Look, there are a bunch of fellas in that division who are very blokey and they joke around a lot. I figured it wouldn't be so comfortable for you, being gay, to be in that environment." This is direct discrimination against the staff member on the basis of his sexual preference.

Indirect discrimination can happen because a requirement, condition or practice is implemented that applies to everyone but which results in disadvantaging a single person or group of people with a protected attribute.

Example

A supervisor requires all staff to start work at 6am. This treats everyone equally, but it disadvantages one staff member, who needs to care for their children prior to school hours. This may amount to indirect discrimination depending on all the circumstances of their situation.

There are, however, **exceptions** where some discrimination may not be unlawful. This includes where the action is:

- permitted by another law; or
- is an inherent requirement of the particular position.

Example

A staff member was dismissed from their employment after long periods of time not attending for work because of a long-term illness and where the staff member had exhausted all their leave options. It is an inherent requirement of a position to be able to attend for work and their dismissal, in these circumstances, may not be unlawful discrimination.

4.5 What is harassment?

Staff must not engage in unlawful harassment of any type.

Unlawful Harassment occurs when unwelcome behaviour based on a person's race, sex or disability, causes the person affected to feel intimidated, insulted or humiliated and a reasonable person would expect it would have this effect.

- The unwelcome behaviour need not be repeated to constitute harassment.
- Harassment can be experienced by witnessing behaviour not directed to that person e.g. overhearing sexist remarks or insulting terms based on gender.

Harassment includes, but is not limited to, behaviour such as:

- making offensive comments or insults masquerading as jokes about particular racial or religious groups;
- sending explicit or sexually suggestive emails, text messages or memos;
- displaying racially offensive or pornographic images or sending explicit images or footage;
- making derogatory comments or taunts about a person's race, culture, ethnicity, sex or disability;
- acting seemingly disgusted or showing contempt to another related to race or ethnic activities;
- asking intrusive questions about someone's personal life, including someone's sex life; and
- repeated inappropriate comments at a colleague's expense.

Example

After the Christmas holidays, a group of staff were discussing what they did over the holiday break. One staff member talked about their holiday to Indonesia and how much they loved laying by the pool in the sun. A colleague turned to them and said, "didn't you go back to your country and fight for Islam"?

4.6 What is sexual harassment?

Staff must not engage in sexual harassment.

Sexual harassment is a specific form of unlawful harassment. It is:

- an unwelcome sexual advance or request for sexual favours to the person harassed, or other unwelcome conduct of a sexual nature in relation to the person harassed;
- in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can affect all genders, and can include making a statement of a sexual nature to a person, or in the presence of a person, whether the statement is spoken or in writing.

Sexual harassment can be a single sexual advance, request for sexual favour or other unwelcome conduct of a sexual nature.

Sexual harassment includes, but is not limited to, behaviour such as:

- sexual jokes or innuendo;
- implying sexual relations, such as in physical gesturing;
- unwelcome physical touching such as kisses, embraces, touching of body parts;
- sexual assault;
- sending, or viewing pornography in the presence of others;
- obscene or threatening communications such as phone calls, letters, emails, text messages and postings on social networking sites.

Example

A staff member was told to wear low cut tops to get the attention of their manager. The person making the comments intended them to be funny; however, the staff member was offended and upset.

That a person does not object to the conduct at the time, does not mean that the conduct was welcome. Depending on the circumstances, a person who has less power than the harasser in the circumstances (e.g. a direct report of the harasser, a new junior employee) may not feel comfortable to object or may even appear to reciprocate due to fear of repercussions.

However, if the interaction is genuinely consensual, welcome or reciprocated, the conduct is not sexual harassment.

4.7 What is vilification?

Staff must not engage in conduct that is vilification of a person or group.

Vilification is when someone says or does something in public that could make other people ridicule, hate or have serious contempt for a particular group of people or person.

Vilification also occurs when someone incites hatred towards, serious contempt for or severely ridicules a person or group of persons on the ground of their race, religion, sexuality, gender identity, colour, nationality, descent, ethnicity, ethno-religious status, national origin, homosexuality, HIV or aids status or trans-gender status, disability, sexual orientation or lawful sexual activity.

Example

A staff member continually expresses their disgust for a male colleague who identifies as a woman and suggests to other staff members not to associate with this colleague.

4.8 What is victimisation?

Staff must not engage in victimisation.

Victimisation is subjecting someone to a detriment or threatening to do so because they have made a complaint, helped someone else make a complaint, or participated in the Complaint Resolution Process. In some cases, it can be unlawful.

Example

A staff member made a complaint about their manager's behaviour that was in breach of this Code. After the complaint, the staff member's colleagues stopped including them in usual workplace activities, including inviting them to after work drinks.

5 Workplace Health and Safety

Everyone in the workplace has a responsibility to ensure the working environment is safe.

Murray Irrigation has a legal duty of care to staff and customers, and staff in turn are responsible for working in manner that is not harmful to the health and safety of others.

Staff **must** present for work in a fit state so that in carrying out activities for or on behalf of Murray Irrigation they do not:

- Expose themselves, their colleagues, customers or visitors to unnecessary risks;
- Inhibit their ability to fulfil the requirements of their position;
- Present a poor public image of Murray Irrigation;
- Cause damage to Murray Irrigation property.

There are a range of factors which impact on a staff member's ability to carry out their activities safely, including adhering with safety protocols and the impact of drugs and alcohol.

5.1 Safety protocols

Murray Irrigation believes that all safety incidents are preventable through the correct planning and execution of our work. To do staff must follow Murray Irrigation's standards, policies, operation procedures and rules; and be vigilant in identifying and reporting safety hazards and risks.

Staff must:

- Learn and comply with the requirement of Murray Irrigation's WHS standards, policies and procedures;
- Wear and use personal protective equipment when required;
- Participate in any safety training required for their role;
- Familiarise themselves with emergency procedures; and
- Report issues that may impact upon their fitness for work to their manager.

5.2 Alcohol and other drugs

Staff must not attend for work affected by alcohol or drugs, other than validly prescribed or over-the counter medication.

Prescription medication

If you take prescription or over-the counter medication that may impact on your ability to perform you work, including to perform it safely, you must discuss this with your supervisor/manager and disclose to the Human Resources Manager.

Illegal/Classified drugs

Staff who have a valid prescription for classified drugs (such as medicinal cannabis, dex-amphetamines, opiates) must disclose this to the Human Resources Manager.

Staff must not, otherwise, handle, possess, consume or trade in classified illegal or prescribed drugs, in the workplace.

Alcohol

Staff must not consume alcohol in the workplace unless authorised by the relevant General Manager or Chief Executive Officer (e.g. for Murray Irrigation social events).

The Murray Irrigation Fitness for Work Procedure clearly explains our standards and expectations for our staff.

Testing

Murray Irrigation reserves the right to conduct drug and alcohol testing for staff on a random or with cause basis.

6 Use of Company Property

Murray Irrigation provides, or makes accessible, its property (**Company Property**) to staff to enable staff to perform their duties to, for or on behalf of Murray Irrigation. Company Property includes computers, software, internet access, mobile phones, electronic mail and other computing systems, documents, and physical assets or utilities (such as buildings, electricity, water etc.).

6.1 Appropriate use

Staff must not use Company Property inappropriately. Examples of inappropriate use include:

- excessively using Company phones, electronic mail or computing systems for personal use, including to access social media. Excessive personal use is where it interferes with, obstructs or delays the performance of duties for or on behalf of Murray Irrigation;
- using Company Property in a manner that may breach this Code or any other applicable policy, procedure, or law. For example, sending or procuring an email containing offensive, vilifying, sexist, racist or pornographic content;
- using computer systems or mobile phones to engage in gambling;
- engaging in activities which could cause congestion and/or disruption to networks or systems;
- excessive cc'ing of staff into email correspondence; and
- conducting unlawful activities such as hacking.

Staff **must** take all reasonable steps to appropriately safeguard and protect Company Property from loss, theft or inappropriate use, including by:

- immediately upon become aware alert their manager or HR if they become aware of the loss or theft of its property, or any unauthorised intrusion or use of its property;
- reporting any offensive/inappropriate content received on computer systems to their manager or HR; and
- appropriately maintain the confidentiality and integrity of Company Property.

6.2 Monitoring and surveillance

In accordance with applicable laws, Murray Irrigation may carry out surveillance of its workplaces and monitor the use and operation of Company Property, including by way of software designed to filter the use of web and email content, Murray Irrigation may conduct forensic computer examinations randomly and/or in the event of a suspected or reported breach of this Code or other policy or law.

6.3 Privacy and information security

Murray Irrigation takes its obligation seriously in regard to complying with the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988* (Cth). To ensure compliance, staff who are responsible

for collecting, or who have access to, the personal information of individuals, including customers and other staff members, must familiarise themselves, and act consistent, with the Murray Irrigation Privacy Policy.

Staff must not:

- Access personal information unless they have appropriate authorisation and a legitimate business need for that information;
- Provide personal information to anyone inside or outside of Murray Irrigation without proper authorisation;
- Conduct reference checks without proper authorisation or the consent of the individual.

7 Reporting a Breach of the Code

Staff play a critical role to ensure that Murray Irrigation is an ethical, professional, respectful and safe place to work.

To that end, staff are strongly encouraged to call out and/or report any behaviour/s which they have witnessed or experienced that may be in breach this Code.

Staff may report the behaviour in accordance with the process set out in the Murray Irrigation Complaint Resolution Procedure, or if relevant, the Murray Irrigation Whistleblower Procedure.

Under those procedures, any unacceptable workplace behaviour will be dealt with having regard to the facts and circumstances of each case.

7.1 Malicious and/or vexatious complaints

Reports of behaviours in breach of this Code must be based on a genuine and honest believe that there has been a breach. Staff must not make a complaint against another person that is malicious or vexatious.

A **malicious complaint** is one made with the intention of causing harm to the subject of the complaint rather than seeking to address a genuine concern about that person's behaviour. Lying about an issue or incident, knowing that in doing so it will cause harm to the person is a malicious complaint.

A **vexatious complaint** is:

- A complaint without reasonable grounds or substance;
- A complaint that is unduly repetitive and has limited or no substance; or
- A complaint that has previously been raised and resolved.

8 Consequences of a Breach of this Code

Any breach of this Code could lead to a variety of outcomes, depending on the nature and/or frequency of the breach. Outcomes may include, but is not limited to, one or more of the following:

- Apologies;

- Warnings;
- Coaching and/or training;
- Demotion;
- Suspension;
- Termination of employment/engagement.

Any outcome will be in accordance with the relevant contract and/or enterprise agreement.

Where the conduct is potentially criminal in nature, the matter will be reported to the Police.

9 Whistleblowing Policy

The Murray Irrigation Whistleblowing Policy and Procedure documents our company's commitment to ensuring all staff and shareholders are aware of their rights and responsibilities when reporting misconduct via our whistleblowing service.

Reports to this service can be made via the online reporting service or verbally by telephone. The contact details are:

Whistleblower service: Your Call Whistleblowing Solutions ("Your Call")

Online Reporting Service: <https://www.yourcall.com.au/report>

Hotline: 1300 790 228 between 9am and 12am on recognised business days, AEST.

Murray Irrigation unique identifier code: MIL2710.

Matters raised will be investigated in accordance with the Murray Irrigation Whistleblower Procedure.

If a disclosure is made in relation to any Director of Murray Irrigation and the Murray Irrigation Disclosure Officer determines that such disclosure qualifies for protection and ought to be investigated, the matter will be referred to an external investigator to conduct an investigation in accordance with section 10 of the Murray Irrigation Whistleblower Procedure.

If the report prepared by the external investigator substantiates on the balance of probabilities that a Director of Murray Irrigation engaged in serious misconduct in relation to the Company, the Director agrees to resign voluntarily from their position with immediate effect. Serious misconduct includes:

- contravention of this policy;
- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threat of violence, criminal damage against property or unlawful workplace conduct;
- any act or omission which jeopardises the safe workplace and environment for the Company's workers;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe; and
- any material failure to comply with, or material breach of, legal or regulatory requirements.

10 Related Documents and Legislation



| Description | Doc Reference |
|---|--|
| Race Discrimination Act 1975 (Cth) | |
| Sex Discrimination Act 1984 (Cth) | |
| Privacy Act 1988 (Cth) | |
| Disability Discrimination Act 1992 (Cth) | |
| Corporations Act 2001 (Cth) | |
| Age Discrimination Act 2004 (Cth) | |
| Fair Work Act 2009 (Cth) | www.fairwork.gov.au |
| Anti-Discrimination Act 1977 (NSW) | |
| The Privacy and Personal Information Protection Act 1998 (NSW) | |
| Work Health and Safety Act 2011 (NSW) | |
| Murray Irrigation Fitness for Work Procedure | PROC-01-21 |
| Murray Irrigation Limited Enterprise Agreement 2023(or as varied or replaced from time to time) | |
| Murray Irrigation Whistleblowing Policy Statement | POLI-03-08-03 |
| Murray Irrigation Whistleblowing Procedure | PROC-03-08-03 |

11 Document Revision Summary

| Rev No | Rev Date | Section Revised | Revision Description | Prepared by | Checked by | Approved by |
|--------|------------|-----------------|---|------------------------------|---------------|-----------------|
| 1.4 | 26/06/2025 | ALL | Formal review | Alison Bult | Nicole Young | Ron McCalman |
| 1.3 | 24/04/2024 | ALL | Formal Review (updated template; minor changes) | Megan Quirk | Nicole Young | Ron McCalman |
| 1.2 | 26/04/2021 | ALL | Formal Review (minor changes applied) | Angela Hussey | Lachie Knight | Philip Endley |
| 1.1 | 04/04/2019 | 8, 11.2 & 13 | Minor revision of position titles | Angela Hussey | Suni Campbell | Michael Renehan |
| 1 | 26/06/2018 | Adopted | Updated Whistleblowing details | Angela Hussey Megan Quirk | Suni Campbell | Michael Renehan |

| | | | | | | |
|---|------------|---------|---------------|---------------|---------------|-----------------|
| 0 | 24/11/2017 | Adopted | First Release | Angela Hussey | Suni Campbell | Michael Renehan |
|---|------------|---------|---------------|---------------|---------------|-----------------|

12 Approval Record

| Name | Title | Signature | Date |
|--------------|-----------------|--|----------------|
| Ron McCalman | Code of Conduct |  | June 27, 2025 |
| Ron McCalman | Code of Conduct |  | April 24, 2024 |
| Phil Endley | Code of Conduct | PH Endley | Jul 1, 2021 |

Acknowledgement of the Murray Irrigation Code of Conduct

I _____
(Name in Full)

Position _____ Department _____

Acknowledge I received the Murray Irrigation Code of Conduct on _____
(date)

Signed _____ Date _____

By making this acknowledgement you are confirming the obligation you have to apply the Murray Irrigation Code of Conduct to the work you do for and/or on behalf of Murray Irrigation.

If you have any difficulties or questions regarding this Code, you should discuss this with your manager or supervisor in the first instance, or the HR Manager or the Chief Executive Officer.

Please forward this acknowledgement to the HR Department for inclusion on your personnel file.