

Global Ethical Behaviour Policy

Board approved November 2017

At Fonterra we believe:

A culture of honesty and integrity is integral to Fonterra's reputation and commitment to our purpose.

A reputation that our customers, farmer shareholders, business partners and communities can trust is built on the actions of all our people. Together we earn this trust everyday by living our values and acting ethically, honourably and honestly.

Doing business with integrity includes good corporate governance and complying with policies, procedures and regulations.

We are committed to:

- Embedding a culture of integrity, honesty and transparency, and creating an environment where people feel confident to speak up.
- Conducting our business in a manner that at a minimum meets legislative and regulatory requirements and respects generally accepted business practises and cultural norms.
- Ensuring strong and transparent business practises in the areas of actual or potential conflict of interest situations, gifts and corporate hospitality/entertainment, bribery and corruption, and the disclosure of fraudulent and unlawful activity.

And we expect that:

- The highest standards of integrity and professionalism are maintained by all, and the value of doing what's right is embedded as best practice.
- Our people speak openly and honestly and challenge things that don't seem right.
- Our people take the time to understand Fonterra's ethical behaviour expectations, and how these apply to them in their roles and daily decision making. This includes but is not limited to:
 - Identifying, reporting and the resolution of potential or actual conflict of interests which may impact on Fonterra's ability to conduct business with integrity; knowing how and when to use the Conflict of Interest Register.
 - Knowing the specific requirements and reporting processes for giving and receiving corporate gifts and hospitality/entertainment, using the Gift, Hospitality and Entertainment Register if relevant.
 - Reporting actual or suspected fraudulent or unlawful activity to their manager or through The Way We Work Hotline as soon as it is discovered.
 - Never being involved in any illegal or disreputable activities including bribes, kickbacks or corrupt payments to obtain business.



Miles Hurrell
Chief Executive Officer



Mike Cronin
Managing Director People and Culture (Acting)