

**PETER LEHMANN WINES LIMITED**  
**CODE OF CONDUCT FOR DIRECTORS & EMPLOYEES**

**Values**

Loyalty, hard work, talent, patience, teamwork and recognition of other people's talents are the values which permeate our workforce.

These values are essential for the achievement of PLW's corporate objectives -

- ❑ Maximising returns to shareholders while at the same time conserving adequate funds to provide the necessary working capital for the continued operation and growth of the Company
- ❑ Maintaining the reputation of the Peter Lehmann Winery business as a producer of premium wines
- ❑ Expanding the distribution base of the Peter Lehmann products in both the domestic and export markets
- ❑ Acquiring top quality fruit by developing further the strong relationship between the Peter Lehmann Winery and Barossa grape growers
- ❑ Providing a safe workplace for employees
- ❑ Using resources in an environmentally sustainable way
- ❑ Being a good corporate citizen both socially and environmentally

**Standards required to enhance PLW's reputation & performance**

- ❑ Acting honestly and with integrity by dealing fairly with people, recording information accurately and declining expensive gifts or other benefits which compromise independence.
- ❑ Avoiding conflicts of interest where the interests of the individual interfere with the interests of the company as a whole. For example outside financial interests, doing business with relatives and using company property for their personal benefit without permission.
- ❑ Being aware of relevant laws and respecting the law by abiding by its intentions not just the technical requirements.
- ❑ Maintaining confidentiality of business information relating to PLW and its customers, suppliers and employees.
- ❑ Protecting company assets, time and business opportunities.
- ❑ Being committed and acting in a competent and diligent manner.
- ❑ Being accountable and transparent in the delivery of service and information.
- ❑ Being sensitive to the effects of actions on co-workers, customers and suppliers as well as the neighbours, community and environment.

**Employment**

Employees are required to comply with PLW safety procedures and legislative requirements, use appropriate safety equipment and report hazardous conditions.

PLW is committed to providing equal opportunity in all employment practices including selection, hiring, promotion and compensation to all qualified applicants and employees without regard to race, sex, religion, age, national origin and disability which does not impinge on the safety of the employee or co-workers.

Discriminatory practices such as harassment or bullying will not be tolerated.

Union membership is a matter of personal choice and PLW does not discriminate on the basis of membership or non-membership of a trade union.

### **Training & development**

PLW encourages employees to improve their skills and qualifications to benefit both the individual and the business. It is the supervisor's role to ensure employees are adequately trained to perform their tasks and that training is embedded in the performance culture of the work teams.

### **Trading Activities**

PLW operates in a global market where laws, behaviour and cultures vary markedly. Whilst ensuring these practices are respected PLW's practices exclude the following activities -

- Misrepresenting the qualities and/or origin and components of the wines
- Misleading, deceiving or remaining silent to create a false impression
- Dictating to customers the prices at which they sell our wines
- Refusing to supply a customer for no legitimate reason
- Discussing or agreeing to divide sales or purchasing territories
- Reaching any understandings or agreeing with competitors to fix prices
- Misusing personal or business information by selling it or divulging it without consent, unless required to do so by law
- Making donations to political parties
- Offering or accepting bribes
- Reducing PLW's Australian standards of care for co-workers, customers and suppliers in other countries
- Reducing PLW's Australian standards for minimising the business's impact on the environment in other countries

### **Internal Controls**

The business has a structure for controlling the business – planning, running the operation and monitoring activities to assess progress on achieving defined business objectives. Employees are to comply with control activities which include approvals and authorisations of transactions, segregation of duties, verification of supporting documents, reconciliations of accounts, reviews of financial reports and operating statistics and physical security of company assets.

### **Misconduct**

- Any breach of this code is a serious matter and may result in disciplinary action including dismissal and legal action.
- Employees witnessing unethical or illegal activity are obliged to bring it to the attention of a member of the management team or the Company Secretary. Any employee who makes a legitimate report will be treated with respect and will not be subjected to retaliation from management or co-workers.