



DELISCHOOL • FOODCORP • SKYFOOD

# CODE OF BUSINESS CONDUCT



# OUR FRAMEWORK

## OUR VISION & VALUES

### Our Vision

To be a trusted and leading food services partner, delivering safe, nutritious, and high-quality meals while supporting the wellbeing of the communities we serve.

### Our Values

At SHF Services, our values guide every decision we make and every action we take.

We are committed to:

- Safety First – Protecting the health and wellbeing of students, clients, staff, and partners through strict food safety and hygiene standards
- Integrity – Acting honestly, responsibly, and transparently in all our operations
- Respect – Valuing people, cultures, and environments, and fostering positive relationships
- Excellence – Striving for continuous improvement in food quality, service, and operations
- Responsibility – Operating sustainably and ethically, with accountability at every level

## OUR CODE OF CONDUCT

**Our Code of Conduct** defines the standards of behaviour expected of everyone at SHF Services.

It provides clear guidance on:

- Ethical business practices
- Professional conduct and accountability
- Compliance with food safety, labour, and regulatory requirements
- Fair, respectful, and inclusive workplace behaviour

This code supports a culture of trust, professionalism, and responsibility across all our services and locations.

## OUR POLICIES & STANDARDS

**Our Group Policies** establish the minimum requirements and operational standards across SHF Services.

They ensure:

- Consistent food safety and hygiene practices
- Compliance with local regulations and school requirements
- Clear operational procedures and accountability
- Risk management, quality assurance, and continuous improvement

These policies form the foundation for our daily operations and local procedures across all sites.



***“Integrity, safety, and respect are not optional at SHF Services — they define how we work, every day.”***

Patrick, SHF Services



# SHF SERVICES CODE OF CONDUCT

## WHAT IS SHF SERVICES CODE OF CONDUCT?

SHF Services Code of Conduct (“the Code”) sets out the minimum standards and behaviours expected from everyone working with, for, or on behalf of SHF Services. It provides guidance when decisions are not always straightforward and helps ensure that we act ethically, responsibly, and consistently across all our operations. By building trust and confidence with our clients, partners, students, parents, and communities, the Code supports SHF Services’ long-term success and reputation. By following the Code, we protect each other, the people we serve, and the SHF Services brand.

## WHO DOES THE CODE APPLY TO?

The Code applies to everyone working with SHF Services, including:

- Permanent and contract employees
- Temporary staff
- Managers and directors
- Contractors, suppliers, and business partners

Regardless of role, location, or seniority, all are expected to understand and comply with this Code.

## WHY THIS IS IMPORTANT

It is your responsibility to ensure that you have read, understood, and follow:

- This Code of Conduct
- Related SHF Services policies and procedures

If you are unsure about any situation or expectation, you should seek guidance from your line manager or the SHF management team.

All partners and suppliers are also expected to meet these standards and operate in line with our ethical and professional expectations.

## VISION & VALUES

Our Vision and Values define who we are and how we work. They guide our decisions, shape our behaviour, and are reflected in the quality of service we deliver every day.





# OUR 5 GOLDEN RULES

Our Golden Rules support the SHF Services Code of Conduct and guide how we work every day — across all sites, teams, and services. They reflect our shared commitment to safety, integrity, professionalism, and respect.

## **1. Health, Safety & Wellbeing Come First**

We prioritise the health and safety of our customers, students, staff, and partners at all times.

Food safety, hygiene, and safe working practices are non-negotiable.

## **2. Act Ethically and Responsibly**

Any illegal, unsafe, dishonest, or unethical behaviour is strictly prohibited. We comply with all laws, regulations, client requirements, and SHF policies.

## **3. Treat Everyone with Respect**

We treat colleagues, clients, students, partners, and communities with fairness, dignity, and respect, fostering an inclusive and supportive working environment.

## **4. Be Professional, Honest, and Transparent**

We act professionally in all situations and communicate clearly, honestly, and responsibly — especially when handling concerns, incidents, or feedback.

## **5. Protect SHF Services' Reputation**

We act with integrity and good judgement at all times.

Nothing we do should compromise safety, trust, or the reputation of SHF Services.



SHF Services | Serving with Integrity. Nourishing Communities.



# LIVING THE CODE

## WHAT IS EXPECTED OF YOU?

At SHF Services, our words and actions must always reflect our values.

We are committed to the highest ethical standards in how we conduct our business and how we engage with our clients, partners, students, parents, and communities.

This Code provides principle-based guidance and sets out the standards and behaviours expected of everyone working with or on behalf of SHF Services.

Our commitment is to:

- Uphold the standards, principles, and values set out in this Code and apply them in our daily work
- Follow all policies, procedures, and safety requirements to ensure compliance with applicable laws, regulations, and client standards
- Foster a safe, respectful, and inclusive workplace, where everyone has access to the information, training, and tools needed to meet these expectations

All employees, contractors, and business partners must comply with applicable laws and regulations. Where local requirements differ from this Code, the stricter standard must always apply.

We do not engage with any third party whose practices conflict with our values or this Code. If concerns arise, they must be raised and assessed appropriately to protect people, safety, and integrity.

Any breach of this Code or applicable laws may result in disciplinary action, up to and including termination of engagement.



SHF Services | Acting with Integrity. Serving with Purpose.

# OUR ETHICAL DECISION

Using our ethical decision-making model helps us make the right choices. It helps us decide not only what we can do, but what we should do. Doing what's right is always informed by the situation we face and may sometimes go beyond minimum legal requirements. Something that is legal or culturally accepted in one context may not always be appropriate in another.

Our guiding principle is always whether a decision is ethical, responsible, and aligned with SHF Services' values.

Before making a decision — or agreeing with a decision made by someone else — always ask yourself:

- Is it free from any conflict of interest?
- Does it serve a legitimate business purpose?
- Does it reflect my role and responsibility to uphold SHF Services' values?
- Would it not harm SHF Services' reputation if made public?
- Is it in line with our Code of Conduct and Five Golden Rules?

If the answer is no to any of these questions, stop, reconsider, and seek guidance from your Line Manager or the SHF Management Team before proceeding.



SHF Services | Acting Responsibly. Doing What's Right.



A photograph of a chef in a kitchen, wearing a dark uniform and a white apron, is shown from the waist up. The chef is holding a long-handled spoon and stirring a large pot on a gas stove. The kitchen is filled with various cooking equipment, including pots, pans, and a whisk. The entire image is overlaid with a semi-transparent green filter. On the left and right sides, there are white diagonal stripes that create a sense of motion or a stylized border. The text "#WE ARE SHF" is centered in the middle of the image in a white, bold, sans-serif font.

#WE ARE SHF



# SUSTAINABILITY

As a responsible food services provider, SHF Services focuses on areas where we can make the greatest positive impact — on the food system, the environment, and the communities we serve.

Our sustainability approach considers the full scope of our operations, from sourcing and food preparation to service, waste management, and daily behaviours on site. We aim to reduce negative environmental impact while maximising positive contributions wherever possible.

We conduct our business responsibly and encourage environmental awareness at every level, regardless of role or position. This includes reducing waste, improving efficiency, supporting local communities, and acting transparently and ethically.



## DO

- Comply with all applicable laws, regulations, and SHF Services policies relating to environmental matters
- Actively protect the environment and minimise the impact of our operations
- Improve energy and water efficiency and consider carbon reduction in daily operations
- Take steps to reduce food waste, including responsible portioning and, where appropriate, supporting food redistribution initiatives
- Reduce unnecessary packaging and promote sustainable alternatives to single-use plastics
- Use resources responsibly and avoid waste wherever possible
- Ensure teams are equipped with the training, tools, and information needed to support sustainable practices
- Support local communities and suppliers, and encourage responsible sourcing and local capabilities where feasible



## DON'T

- Dispose of waste in an illegal or irresponsible manner
- Waste water, energy, or food through careless or avoidable practices
- Ignore environmental responsibilities or sustainability commitments
- Misrepresent, exaggerate, or publish inaccurate or misleading sustainability claims or data
- Authorise or disclose sustainability-related information without proper approval
- Support or engage in practices that negatively impact the environment or local communities



# HUMAN RIGHTS AND MODERN SLAVERY

At SHF Services, we respect the human rights, dignity, and wellbeing of all people across our operations and supply chains, including those who may be considered vulnerable.

We are committed to conducting our business responsibly and expect our employees, contractors, suppliers, and partners to comply with all applicable labour, employment, and human rights laws, including laws prohibiting:

- forced or compulsory labour
- child labour
- human trafficking
- discrimination, harassment, or abuse

We support internationally recognised human rights principles and standards and are committed to fair, safe, and ethical working conditions wherever we operate.

SHF Services has zero tolerance for forced labour and is committed to playing its part in preventing and eradicating modern slavery and human trafficking in all its forms.



## DO

- Comply with all local labour and employment laws, including those relating to permanent, temporary, casual, contract, and agency workers
- Treat all employees and workers fairly, with dignity and respect, regardless of race, gender, age, nationality, religion, disability, sexual orientation, or background
- Provide safe, fair, and lawful working conditions
- Uphold freedom of association and the right to raise concerns without fear of retaliation
- Ensure transparent and fair recruitment practices, including clear terms of employment
- Promote awareness of human rights, modern slavery, and trafficking risks within our operations and supply chains
- Respect the rights of local communities and indigenous peoples where applicable
- Raise concerns promptly if there is any suspicion of human rights violations



## DON'T

- Use, support, benefit from, or permit forced, bonded, trafficked, or compulsory labour
- Employ or support child labour in any form
- Allow recruitment fees or related costs to be charged to workers
- Engage in or tolerate discrimination, harassment, intimidation, abuse, or bullying
- Ignore or conceal suspected human rights violations
- Retaliate against anyone who raises a concern in good faith
- Fail to report suspected modern slavery or human trafficking risks

# EMPLOYMENT AND INCLUSION

At SHF Services, we are committed to hiring, developing, and retaining a diverse workforce that reflects the communities in which we operate.

We strive to create a supportive, respectful, and inclusive working environment where everyone feels welcomed, valued, and able to be themselves.

SHF Services is committed to equality, wellbeing, inclusion, and fairness for all employees. We have zero tolerance for discrimination, bullying, harassment, or unfair treatment of any kind.

We also expect our business partners, contractors, and suppliers to uphold these principles and foster workplaces that respect diversity, equity, and inclusion.



## DO

- Comply with all applicable employment laws, regulations, and labour standards
- Treat everyone fairly, equally, and with respect, without discrimination
- Promote a safe, ethical, and inclusive working environment
- Ensure all employment relationships are lawful and transparent, with clear terms, conditions, and benefits
- Make employment decisions (recruitment, promotion, training, transfers) based on merit, skills, experience, and performance
- Respect cultural differences and be mindful that behaviours acceptable to some may not be acceptable to others
- Make reasonable adjustments where needed to support employees with disabilities, health needs, or caring responsibilities



## DON'T

- Employ anyone below the legal minimum working age
- Tolerate or engage in harassment, bullying, discrimination, intimidation, or degrading behaviour
- Engage in offensive, hostile, malicious, or abusive conduct, whether verbal, physical, sexual, or psychological
- Allow threats of violence or acts of violence in the workplace
- Ignore or dismiss complaints related to unfair treatment, harassment, or discrimination



# RESPONSIBLE SOURCING

At SHF Services, we are committed to sourcing our products, ingredients, and services responsibly, in a way that is ethical, sustainable, and socially conscious.

Wherever possible, we prioritise local and responsible suppliers, promote transparency across our supply chains, and work with partners who share our values. We aim to ensure that everything we purchase supports food safety, quality, human rights, and environmental responsibility.

We recognise the importance of visibility and traceability within our supply chains to maximise positive impact and to reduce the risk of abuse, exploitation, or unethical practices.



## DO

- Comply with all applicable laws, regulations, and SHF Services policies related to sourcing and procurement
- Apply the principles of the SHF Services Supplier Code of Conduct across our supply chains
- Conduct appropriate supplier due diligence, from onboarding through to ongoing business relationships
- Ensure sourcing decisions consider food safety, quality, ethics, sustainability, and social responsibility
- Work with suppliers to continuously improve standards, including environmental and animal welfare practices where applicable
- Support local, diverse, and responsible suppliers wherever possible
- Identify and respond promptly to ethical, legal, or safety risks within the supply chain
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## DON'T

- Compromise ethical standards, safety, quality, or integrity in supplier selection or procurement decisions
- Continue business with suppliers who fail to address serious non-compliance with laws, standards, or agreed requirements
- Choose suppliers solely based on convenience or cost when it conflicts with SHF Services' values
- Ignore or fail to act on red flags related to labour practices, food safety, or ethical risks
- Engage with suppliers whose practices could damage trust, safety, or SHF Services' reputation



A person wearing a white lab coat and a hairnet is working in a laboratory. The image is overlaid with a green tint and features geometric patterns, including a network of lines and dots, and a series of white diagonal lines on the left and right sides. The text "HEALTH AND SAFETY" is centered in white capital letters.

# HEALTH AND SAFETY



# WORKPLACE HEALTH AND SAFETY

At SHF Services, our commitment to zero harm is central to how we work.

The health, safety, and wellbeing of our employees, customers, students, partners, and the communities we serve are always our top priority.

We promote robust workplace health, food safety, and operational safety standards across all our activities and expect the same high standards from our business partners and suppliers.

We continuously strive to improve our health and safety performance through training, monitoring, and regular review of our practices, ensuring safe working environments for everyone.



## DO

- Comply with all applicable health and safety laws, regulations, and SHF Services policies
- Follow all food safety, hygiene, and workplace safety procedures relevant to your role
- Stop work immediately if an activity is unsafe and report the issue
- Ensure you are properly trained, competent, and medically fit to perform your duties
- Use required personal protective equipment (PPE) correctly at all times
- Report promptly any incident, near miss, injury, illness, unsafe act, or hazardous condition
- Participate in investigations and support root-cause analysis to prevent recurrence
- Share lessons learned to help improve safety across teams
- Cooperate with audits, inspections, and safety reviews



## DON'T

- Ignore unsafe acts, conditions, or hazards
- Continue working or allow others to work when impaired by illness, fatigue, drugs, or alcohol
- Perform tasks without the appropriate training, authorisation, or capability
- Allow unsafe behaviour to continue without intervention
- Assume someone else will report a safety issue
- Bypass safety rules, procedures, or protective measures



# FOOD SAFETY

At SHF Services, our priority is to serve food that is safe, nutritious, and prepared to the highest standards, using quality products and approved ingredients.

Food safety is fundamental to our operations and to the trust placed in us by students, clients, parents, and partners. To ensure safe and consistent practices, we apply robust food safety systems, procedures, and controls at every site where we operate, in line with regulatory requirements and recognised industry best practice.



## DO

- Comply with all applicable food safety laws, regulations, and SHF Services food safety policies and procedures
- Handle, prepare, store, and transport food under clean, hygienic, and controlled conditions to prevent contamination
- Source food products and ingredients only from approved and reputable suppliers
- Ensure you are properly trained and competent to perform food handling tasks
- Follow allergen management procedures and provide accurate information on allergens, intolerances, and dietary requirements
- Promptly report any actual or potential food safety issue, contamination risk, or non-compliance
- Take immediate action to isolate unsafe food and prevent it from being served
- Participate in food safety audits, inspections, and continuous improvement initiatives
- Keep food safety knowledge up to date through training and refreshers



## DON'T

- Expose food to conditions that could create a risk of contamination
- Perform food-related tasks without the appropriate training, authorisation, or capability
- Allow unsafe or non-compliant food handling practices to continue
- Bypass or ignore food safety procedures, protocols, or legal requirements
- Operate a food preparation or storage area without the required licences or approvals
- Mislead customers about ingredients, additives, or food preparation methods
- Knowingly use unsafe ingredients or fail to highlight allergen risks or labelling requirements
- Assume someone else will report a food safety concern





# PERSONAL INTEGRITY



# CONFLICTS OF INTEREST

At SHF Services, all employees and anyone working for or on behalf of the Group are expected to avoid situations where personal interests could conflict, or appear to conflict, with their professional responsibilities.

A conflict of interest may arise when personal, financial, or family interests influence — or could be perceived to influence — business decisions, judgement, or actions. Such situations can undermine trust, fairness, and the integrity of our operations.

We are committed to acting at all times in the best interests of SHF Services, and to fostering a culture of openness, transparency, trust, and integrity. Declaring potential or actual conflicts helps protect both the individual and the organisation.



## DO

- Comply with all applicable laws, regulations, and SHF Services policies
- Ensure that personal activities, interests, and relationships do not conflict with your duties or responsibilities at SHF Services
- Promptly declare any actual, potential, or perceived conflict of interest to your Line Manager or Management Team
- Act transparently and cooperate to manage or remove conflicts appropriately
- Seek guidance where a situation is unclear before taking action
- Ensure decisions involving suppliers, recruitment, procurement, or partnerships are made fairly, objectively, and in the best interests of SHF Services
- Record declared conflicts where required, in accordance with internal procedures



## DON'T

- Use your position at SHF Services for personal gain or to benefit family members, friends, or associates
- Divert business opportunities, contracts, or information for personal advantage
- Influence or participate in decision-making where a conflict of interest exists or may reasonably arise
- Accept roles, appointments, or outside engagements that could compromise your independence or judgement
- Misuse confidential information obtained through your role for personal or third-party benefit



# CONFIDENTIAL AND SENSITIVE INFORMATION

At SHF Services, we are committed to protecting all confidential and sensitive information and to sharing it strictly on a need-to-know basis, with the appropriate authorisation.

This includes information relating to our employees, students, parents, clients, schools, suppliers, pricing, menus, contracts, operational processes, financial data, systems, and business strategies.

All employees and partners are expected to handle information responsibly and in accordance with applicable laws, data protection requirements, and SHF Services policies. Misuse or unauthorised disclosure of confidential information may result in disciplinary action and legal consequences.



## DO

- Comply with all applicable laws, regulations, and SHF Services policies relating to confidentiality and data protection
- Ensure confidential information is accessed, used, and shared only for legitimate business purposes
- Share information strictly on a need-to-know basis and only with authorised persons
- Take care when handling confidential information in emails, documents, systems, meetings, and public areas
- Protect sensitive data related to students, parents, schools, staff, suppliers, pricing, and operations
- Secure documents and devices appropriately and follow IT and data security guidelines
- Seek guidance from management if you are unsure whether information is confidential or how it should be handled



## DON'T

- Copy, disclose, or use confidential or sensitive information for personal gain or unauthorised purposes
- Share confidential information with colleagues, friends, family members, or third parties who do not have a legitimate business need
- Discuss sensitive matters in public areas or unsecured communication channels
- Remove or store confidential information in an unsafe or unauthorised manner
- Retain or use SHF Services' confidential information after your employment or engagement has ended
- Assume someone else will report a data breach or information security concern



A person wearing a white lab coat is using a handheld electronic device. The background is a laboratory with various glassware and equipment. The image has a green overlay and white diagonal stripes on the left and right sides.

# PERSONAL INTEGRITY



# FAIR COMPETITION

At SHF Services, we are committed to competing fairly, transparently, and responsibly in all markets where we operate.

Fair competition laws exist to protect customers, partners, and the integrity of the market. They prohibit practices that restrict competition, such as price-fixing, bid-rigging, market sharing, or the improper exchange of commercially sensitive information.

We conduct our business independently and ethically, ensuring that our pricing, tenders, contracts, and commercial decisions are made based on merit, quality, service, and compliance, and not through unfair or anti-competitive behaviour.

We promote fair competition and maintain the trust of our schools, clients, business partners, and communities by complying with all applicable competition laws and regulations.



## DO

- Comply with all applicable competition, antitrust, and fair-trade laws
- Ensure all commercial relationships, pricing, tenders, and contracts are properly documented and approved
- Make independent pricing and commercial decisions based on SHF Services' own costs, strategy, and value proposition
- Exercise caution when attending industry events, meetings, or discussions where competitors may be present
- Seek guidance from management if collaborating with other organisations on industry, sustainability, or community initiatives
- Immediately report any suspected anti-competitive behaviour or inappropriate discussions



## DON'T

- Discuss pricing, margins, costs, tenders, client allocation, or commercial strategy with competitors
- Share commercially sensitive information directly or indirectly with competitors
- Agree with competitors to fix prices, divide markets, allocate customers, or coordinate bids
- Attempt to influence how schools, clients, or partners set prices or select suppliers unfairly
- Participate in any arrangement that could limit fair competition or distort the market
- Assume that informal discussions or "industry norms" make anti-competitive behaviour acceptable

# COUNTERING BRIBERY AND CORRUPTION

At SHF Services, we are committed to upholding the highest standards of integrity, transparency, and professionalism in everything we do.

Bribery and corruption undermine trust, distort fair decision-making, and damage communities and businesses. Any form of bribery, facilitation payment, kickback, or improper advantage — whether financial or non-financial — is strictly prohibited, regardless of local custom or business pressure.

This applies to all interactions with schools, clients, suppliers, contractors, government bodies, inspectors, and third parties acting on behalf of SHF Services.

Any unethical or illegal activity is strictly prohibited.



## DO

- Comply with all applicable anti-bribery and anti-corruption laws and regulations
- Act with integrity to protect SHF Services' reputation and long-term sustainability
- Reject any demand for, or offer of, a bribe or improper advantage
- Seek management approval and guidance before offering or accepting gifts, hospitality, or sponsorships
- Ensure third parties acting on SHF Services' behalf (agents, consultants, suppliers) uphold the same ethical standards
- Exercise extra caution when dealing with public officials, inspectors, regulators, or school representatives
- Ensure donations, sponsorships, and community contributions are transparent, approved, and properly recorded
- Immediately report any suspected bribery, corruption, or unethical behaviour to management



## DON'T

- Offer, give, accept, or request bribes or facilitation payments in any form
- Offer gifts, hospitality, cash, discounts, services, or benefits intended to influence decisions
- Make “grease payments” to speed up approvals, inspections, or services
- Use intermediaries, agents, or suppliers to make improper payments on SHF Services' behalf
- Pay personal expenses for clients, officials, or partners as a way to gain advantage
- Ignore or assume unethical practices are acceptable due to local custom or pressure





# EXTERNAL ACTIVITY



# DEALING WITH REGULATORY BODIES AND POLITICAL ACTIVITY

As part of our operations, SHF Services regularly interacts with regulatory authorities, inspectors, auditors, and public bodies (including health authorities, education authorities, local councils, and government agencies).

We are committed to conducting all such interactions lawfully, transparently, and professionally, and to complying with all applicable local laws and regulations governing regulatory engagement and political activity. SHF Services maintains a strictly neutral position in relation to political activity and does not seek to influence political decisions through donations or improper engagement.

It is SHF Services' policy not to make any political donations.



## DO

- Comply with all applicable laws and regulations when dealing with regulatory bodies and public authorities
- Be truthful, accurate, and transparent in all communications with inspectors, auditors, and officials
- Cooperate fully with lawful inspections, audits, investigations, and regulatory reviews
- Ensure that any communication with regulators or authorities is professional, factual, and authorised
- Inform management of planned or significant interactions with regulatory bodies where appropriate
- Seek guidance from management if unsure whether an activity could be considered political or regulatory in nature



## DON'T

- Make political donations or contributions on behalf of SHF Services
- Provide financial or non-financial support to political parties, candidates, or political organisations
- Attempt to improperly influence regulatory decisions, inspections, or approvals
- Engage in lobbying or political discussions with officials on behalf of SHF Services without authorisation
- Use SHF Services' resources, name, or position to support political activities
- Ignore or withhold information requested lawfully by regulators or authorities



# EXTERNAL COMMUNICATION

At SHF Services, we are committed to sharing accurate, clear, and appropriate information about our operations, services, and performance with our stakeholders, including schools, parents, clients, partners, regulators, and the media. External communications play an important role in maintaining trust and protecting SHF Services' reputation. All external statements must therefore be truthful, consistent, and properly authorised.



## DO

- Ensure that any external communication on behalf of SHF Services is accurate, factual, and appropriate
- Refer media enquiries, public statements, or sensitive external requests to management or the designated communications contact
- Obtain approval from management before responding to enquiries from:
  - Media or press
  - Regulatory or government bodies (where communications are sensitive)
  - Industry associations or public forums
- Use approved and up-to-date information when communicating with schools, parents, clients, or partners
- Seek guidance if unsure whether information is confidential or suitable for external sharing



## DON'T

- Make public statements or respond to media, press, or social media enquiries on behalf of SHF Services without authorisation
- Share confidential, sensitive, or commercially sensitive information externally
- Publish statements, presentations, or online content that could misrepresent SHF Services
- Speak on behalf of SHF Services in public forums unless formally authorised
- Disclose information relating to incidents, investigations, or regulatory matters without approval

# SPEAK UP WE'RE LISTENING



IF IN DOUBT —  
SPEAK UP.  
WE'RE LISTENING.

At SHF Services, we are committed to conducting our business with integrity, transparency, and respect. We encourage everyone working with or on behalf of SHF Services to speak up if they have concerns about behaviour that does not align with our values, our Code of Business Conduct, or applicable laws and regulations.

## **WHAT YOU CAN RAISE**

You are encouraged to raise concerns related to:

- unethical or inappropriate behaviour
- breaches of this Code or SHF Services' policies
- fraud, corruption, or conflicts of interest
- health, safety, food safety, or environmental risks
- discrimination, harassment, or retaliation
- any other conduct that does not feel right

If something concerns you, trust your judgement and speak up.

## **HOW TO RAISE A CONCERN**

Concerns can be raised through:

- your Line Manager or site manager
- Human Resources
- SHF Services Management
- or through Voice Your Concerns, We're Attentive, our confidential and independently operated whistleblowing programme

The whistleblowing channel is available 24 hours a day, 7 days a week, and supports multiple languages.

## **CONFIDENTIALITY AND ANONYMITY**

Reports can be made confidentially or anonymously, subject to local legal requirements. All concerns are handled discreetly, and information is shared strictly on a need-to-know basis.

## **NO RETALIATION**

SHF Services strictly prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation. Any form of retaliation will be treated as a serious breach of this Code.

## **OUR COMMITMENT**

All concerns raised are taken seriously and reviewed fairly and promptly. Where required, appropriate action will be taken. We expect full cooperation from employees, suppliers, and business partners during any investigation or review.

If in doubt — speak up. We're listening.