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0101-08 Code of Conduct

Lindsay Australia Limited ACN 061 642 733

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1. General

As an ASX listed company, Lindsay Australia Limited, together with its related parties (**Company**) is required to comply with ASX Listing Rules and relevant laws governing the way it conducts its business.

This document sets out the Company's Code of Conduct which outlines how the Company intends to undertake its business and operations.

2. Definitions and interpretation

2.1 Definitions in this document:

Term	Definition
Adoption Date	means the date this document was adopted by the Board.
ASX	means ASX Limited ACN 008 624 691.
Board	means the board of Directors of the Company.
Chair	means the Chair of the Board.
CEO	means the Chief Executive Officer (by whatever title generally known, whether Chief Executive Officer, Managing Director or otherwise).
CFO	means the Chief Financial Officer or equivalent officer of the Company (by whatever title known).
COO	Means the Chief Operating Officer or equivalent officer of the Company (by whatever title known).
Company/Group	Means Lindsay Australia Limited ACN 061 642 733 and its related parties forming part of its corporate group including Lindsay Transport Pty Ltd, Lindsay Rural Pty Ltd, Lindsay Fresh Logistics Pty Ltd.
Code/Policy	means this Code of Conduct as outlined in this document or in any amending or replacement document.
Secretary	means the appointed Company Secretary(s).

Concepts not defined in this document, but which have a meaning in relevant laws, or the Listing Rules have that same meaning in this document.

3. Introduction

The Code of Conduct is underpinned by our Company values and represents the Company's commitment to uphold the high morals and standards. Lindsay Australia's values are:

- Safe Always
- Stronger together
- Own it
- Ready to adapt
- Do what's right

The Company aims to continually build on its reputation of integrity, and to be valued as an employer, a business associate, and a community partner in all its relationships.

Directors, management, and employees shall deal with the Company's customers, suppliers, competitors and each other with honesty, fairness and integrity and observe the legal and regulatory environment in which the Company operates.

The Company aims to:

- increase Shareholder value within an appropriate framework which safeguards the rights and interests of the Company's Shareholders and the financial community; and
- comply with systems of control and accountability which the Company has in place as part of its corporate governance with openness and integrity.

The Board requires the Code of Conduct is to be enacted by its people, as its application can positively influence relationships with community, corporate and individual partners.

The Code of Conduct reflects the shared values throughout the Company and outlines behaviour expected of anyone working for or on behalf of the company and encourages each individual to "do the right thing" and sets the standards for the way the Company operates.

Where a provision of this Code may be interpreted as differing from applicable laws, standards or policies, we must comply with those laws, standards and policies. However, where the Code sets a higher standard, it is expected that we will follow the Code. Additionally, the Company recognises and respects the rights of individuals and will comply with the applicable legal rules regarding privacy, and the use of privileged or confidential information.

4. Application of this Code

Anyone working for or engaged by the Company is required to understand and comply with this Code. This includes staff, employees, consultants, contractors, and directors. Through appropriate contractual arrangements and procurement principles, consultants, agents, contractors, and suppliers of the Company are equally expected and encouraged to comply with the Code of Conduct in all their dealings with or on behalf of the Group.

4.1 How we Act

The following actions are required of all persons under this Code:

- Undertake every task in a safe, compliant and responsible manner;
- Treat each other with respect and work together to deliver results;
- Be courageous and accountable for our actions;
- Be relentless in our pursuit to find sustainable and innovative solutions;
- Respect and comply with the law and act accordingly, not knowingly participate in any illegal or unethical activity;
- Be fair, transparent and honest in our dealings;
- strive to achieve beneficial outcomes for our people and the communities in which we operate;
- Build an enviable reputation in the industry;
- Comply with this Code and other policies and procedures of the Company;
- Disclose any material personal interests or relationships you may have with any Company stakeholders including suppliers and customers, which may be or perceived to be a conflict of interest;
- Do not advantage from Company's property or information in your possession for personal gain;
- Not act in a way that might negatively affect the Company's reputation.

4.2 Asking questions and reporting violations

The Company provides various avenues for raising concerns about unethical or illegal business conduct, misconduct or an improper state of affairs. The Company also offers protection to anyone who reports concerns in good faith under the Company's Whistleblower Policy. The Company Whistleblower Policy is located on the website <https://www.lindsayaustralia.com.au>. Reportable conduct can be disclosed via Stopline, a confidential independent provider of whistleblowing services at 1300 304 550 or at <https://lindsayaustralia@stoplinereport.com/>

4.3 Health and Safety

The Company is committed to the health and wellbeing of all employees and contractors. We strive to build a solid culture of safety accountability across all levels of the business; where everyone acts like a leader and takes action to ensure safe operations, including stopping services or activities when necessary.

We are committed to providing a safe workplace as we work together to become industry leaders in safety.

All Managers and employees are accountable for complying with applicable workplace health and safety legislation and regulations (including Heavy Vehicle National Laws), policies, procedures, and standard operating procedures relevant to their role. Additionally, all employees are required to look after themselves and watch out for their workmates, to report all incidents, identify and report hazards, and report fit-for-work.

Further details are set out in the Health and Safety Policies and other related policies, procedures and standards.

4.4 Environment and Sustainability

The Company is committed to responsibly managing its environmental impacts.

We aim to prevent, mitigate, or offset any potential harmful effects of our activities on the environment and deliver our commitments set out in the Company ESG plan. We understand this is critical to maintain our license to operate and to manage and minimise the potential impact of our activities.

4.5 Human Rights

Our employees and contractors are entitled to work in an environment and under conditions that respect their rights and dignity, and that comply with all legal requirements. The Company is committed to upholding and respecting human rights and we will take action year-on-year, to progress our monitoring of the ethical labour supply practices of our contractors and suppliers (as well as our own).

We require our contractors, suppliers, and business partners to actively support our efforts to address disparity in the workplace (such as indigenous or gender disparity) through the provision of skills, employment, and business opportunities.

4.6 Native Title and Heritage

We respect the rights and interests of native title holders to protect and promote Indigenous history and culture. The Company recognises the interests of native title holders and the proximity of the Company's operations to places of cultural meaning.

4.7 Community

We set out to build enduring relationships with the communities in which we operate that are characterised by respect, trust, and enriching lives through our participation. Through active collaboration we strive to implement long-term sustainable benefits for the local communities, regional and national stakeholders, and the Company.

4.8 Bribery and Corruption

Our Company prides itself on our reputation for acting with integrity and honesty and we are committed to a zero-tolerance approach to bribery and corruption. Our reputation is built on our values as a company, the professionalism of our employees and our collective commitment to acting with integrity, accountability and transparency at all times.

Bribery and corruption undermines legitimate business activities, distorts competition and exposes the Company and our employees to significant risks. Our commitment to do business with integrity includes always complying with the laws of every country in which we operate. Further information is available in the Company's Anti-bribery and Corruption Policy.

4.9 Facilitation Payments, Secret Commissions and Gifts

The making of facilitation payments by Company employees is prohibited. Facilitation payments are typically minor, unofficial payments made to secure or expedite a routine government action by a government official or employee.

Secret commissions are prohibited. These payments typically arise where a person or entity (such as a Company employee) offers or gives a commission to an agent or representative of another person (such as a customer of the Company) which is not disclosed by that agent or representative to their principal. Such a payment is made as an inducement to influence the conduct of the principal's business.

The Company prohibits the giving and receiving of gifts in connection with Lindsay's operations which go beyond common courtesies associated with general commercial practice. This is to ensure that the offer or acceptance of a gift does not create an obligation or cannot be construed or used by others to allege favoritism, discrimination, collusion, or similarly unacceptable practices by the Company. Further information is available in the Anti-Bribery and Corruption Policy.

5. Conflicts of Interest

All persons under this Code are obligated to avoid and or declare situations in which personal interests' conflict, or might appear to conflict, with duties to the Company; or circumstances that could compromise an individual's ability to make impartial business decisions that are in the best interests of the Company.

While the Company recognises and respect employees' rights to take part in financial, business, and other activities in their own time. These activities should be free of conflict with responsibilities to Company and should not impact on the dedicated performance of employment duties. Employee's must never use their position with the Company to obtain personal gain or benefit for themselves or third parties (such as friends, relatives, and business associates). Employees are required to disclose to the Company, in writing, all actual or perceived conflicts of interest.

6. Continuous Disclosure

Upon becoming aware of any potentially market sensitive information, where such information has not already been released to the market, staff must notify the Company Secretary or the CEO immediately. The Company is legally obliged to inform the ASX immediately upon becoming aware of any information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's listed securities. This may include a significant or material event that impacts on business operations.

The Company Secretary makes disclosures in accordance with relevant ASX obligations and the Company's Continuous Disclosure Policy and must be advised of any information that may be required to be disclosed. The Company's Continuous Disclosure Policy is located on the website <https://www.lindsayaustralia.com.au>

7. Privacy

Our Company is committed to recognising and respecting the privacy of our employees, contractors, suppliers, business partners, customers and shareholders and will only collect personal information ethically and lawfully in a manner which is not unreasonably intrusive. The Company will only use personal information that it holds for the purposes for which it was provided. We may use or disclose personal information were authorised by the party concerned and is necessary to prevent a serious threat to health and safety, or is required by law, or to assist authorities in enforcing the law. The Company's Privacy Policy is located on the website <https://www.lindsayaustralia.com.au>

8. Confidentiality

Individuals with access to confidential information must not reveal such information without appropriate authorisation and are responsible for ensuring that the information is used only for authorised purposes.

Confidential information may include, but is not limited to, trade secrets, marketing information, customer lists, price lists, research and development activities, technical information, financial information, business plans, designs, drawings, techniques, processes, intellectual property, and any information which is not generally available concerning performance, results, or plans.

Employees are expected to exercise discretion in your discussions and communication with people outside Company about the business of the Company, its suppliers, and customers.

9. Use of Company Resources

Employees are responsible for safeguarding Company assets and resources. This may include Company funds, property, stock, equipment and vehicles. Company assets must not be used for personal benefit and employees must take appropriate precautions to prevent theft, damage, and misuse of Company assets.

All employees must report instances or suspicions of fraud and theft immediately after they become aware, regardless of whether the instance relates to an employee, a contractor, or any other party. Unauthorised removal of Company equipment, supplies, or other resources is regarded as theft.

Requests to use the Company's resources for purposes other than Company business, should be referred to an individual's manager, the CFO or CEO for approval. Employees refer to Computer User Policy.

10. Theft of Customer Freight

Where freight is damaged or rejected, the product remains the property of the customer and cannot be tampered with in any instance. Unless specifically approved by a customer in writing that a product can be distributed to staff, the product remains the property of the customer.

- Where a customer asks for their product to be destroyed, we must follow that directive. This directive does not mean ownership transfers to the Company, and their product cannot be distributed to staff.
- Where a customer has advised that the Company may distribute product to staff, it must be approved by the relevant Depot, Branch, Regional or General Manager and equally distributed across the entire staff base.

If employees are found to be distributing or acquiring product outside of the above parameters, they will be subject to action under the company performance management procedure, leading up to dismissal for gross misconduct (theft).

11. Public and Media Content

As Company is a public company listed on the Australian Securities Exchange great care must be taken in discussing the Company's business with third parties.

The Company aims to manage its media liaison effectively, showcasing the Company's achievements and ensuring the Company communicates in a consistent, authoritative manner on all matters related to its operations, results, and values. The following specified officers are authorised to communicate on behalf of Lindsay:

- The Chair of the Board, or his/her nominee, speaks for the Board.
- The CEO may speak on all areas of the Company's activity
- The Chief Financial Officer/ Company Secretary/COO/Head of Corporate Services may speak on areas within their portfolio.

All other directors, officers, employees, joint venture partners, contractors or suppliers shall not represent themselves as spokespeople for the Company (verbally or in writing) unless expressly authorised to do so by the Chairman or CEO as applicable.

12. Insider Trading

All Directors and key management must observe Lindsay's Share Trading Policy.

The Company has established specific time periods when Directors and employees are not permitted to buy and sell Lindsay's securities. Refer details in the Share Trading Policy. The Company's Security Trading Policy is located on the website <https://www.lindsayaustralia.com.au>

13. Creating Awareness of the Code of Conduct

Every person who has managerial or leadership responsibility including directors must ensure that:

- The Company takes action to refresh Managers and employees awareness of the Code and their obligation to comply with it.
- Managers take action to communicate the Code of Conduct to their teams.
- All new starters are to be provided access to the Code of Conduct as part of onboarding.
- The Code will be available on the Company's website and intranet.

14. Breaches of the Code of Conduct

Employees, management, and Directors should note that breaches of certain sections of this Code of Conduct may be punishable under legislation and may also lead to disciplinary action under the Company's Performance Management Disciplinary Procedure, leading up to dismissal.

The Company will address Contractor alleged breaches under the terms of the Contractor Agreement.

15. Policy Approval and Review

The CEO is accountable to the Board of Directors for ensuring that this Code of Conduct is implemented.

The Code will be reviewed routinely as required to ensure its effectiveness.

Appendix 1

Lindsay Australia Limited Employee Conduct

1.0 Purpose

The Lindsay Australia Limited code of conduct outlines the standards of behaviour the company expect from all of our employees. Employees must comply with the code, supporting policies and procedures, and the law at all times. The code is in place to ensure that all employees act in a safe, professional, and responsible manner, thereby making the Company a great place to work and to do business with.

2.0 Expected Behaviour

We expect employees to:

- Comply with the application of Australian Laws.
- Adhere to all company policies and procedures.
- Maintain and promote an environment free from workplace bullying and harassment.
- Promote a safe and healthy workplace and comply with Safety policies and procedures.
- Comply with the company's uniform, Personal Protective Equipment and hygiene standards at all times.
- Present to work fit for duty and free from the effects of prohibited substances and alcohol.
- Maintain the confidentiality of proprietary information.
- Act with honesty and integrity.
- Contribute to and promote a positive work environment.
- Act in a kind, courteous and professional manner.
- Comply with the company's smoking policy.
- Comply with lawful instructions given by company management.
- Use and maintain company equipment and resources as directed.
- Seek and provide assistance/information when required.
- Disclose and take reasonable steps to avoid any conflict of interest.
- Display behaviours that are aligned with the Company values.

3.0 Unacceptable Behaviour

Employees must not:

- Breach or disregard company policies or procedures.
- Direct or encourage others to breach or disregard company policies or procedures.
- Intentionally or recklessly damage, destroy, deface, or tamper with company property.
- Remove company property or equipment for personal use or resale.
- Knowingly provide misleading or incorrect information to the company.
- Threaten violence or physically assault others.
- Bully, intimidate or harass others.
- Make inappropriate sexual, ethnic remarks, or make or behave in other inappropriate, offensive and unprofessional ways.
- Discriminate against or make derogatory comments about others.
- Knowingly or recklessly disturb the peace through disorderly conduct, failure to comply with an order, fighting or quarrelling.
- Knowingly make false charges or allegations against management or colleagues.
- Use offensive or inappropriate language.
- Present for work under the effects of prohibited substances or alcohol.
- Bring the company into disrepute.
- Conduct non-business undertakings in company time.
- Disclose confidential information about the company, customers, or associates of the company.
- Alter or remove company documents without being given the authority to do so.
- Display behaviours that are contrary to the Company Values.

Employees must seek assistance from management if unclear about any of the requirements outlined in the Code.