



Code of Business Conduct

1 Purpose

This Code of Conduct details the basic conduct and behaviour expected of all directors, officers, employees and contractors in performing their everyday roles.

The Code encourages all directors, officers, employees and contractors of the Company to respect and comply with the laws and regulations and maintain a high standard of professionalism, ethics and behaviour in the exercise of their duties with the Company.

2 The Code

2.1 Laws and Regulations

The Company is subject to local, State and Federal laws of the countries in which it operates. Directors, officers, employees and contractors should respect the law and act accordingly.

No one can be directed to carry out an illegal act and no one can justify an illegal act by claiming to be acting under the order of management or to be simply complying with a policy.

2.2 Integrity

Directors, officers, employees and contractors are expected to conduct themselves with integrity, be fair and honest in their dealings and treat others with dignity. They should recognise and communicate any limitations that would preclude responsible judgement or successful performance of an activity of the Company.

2.3 Confidentiality

Directors, officers, employees and contractors should refrain from disclosing to any person any confidential or sensitive information acquired in the course of their work except when authorised to do so, or unless legally obliged to do so.

2.4 Competence

Directors, officers, employees and contractors should maintain an appropriate level of professional competence by ongoing maintenance and technical development of their knowledge and skills. Their duties should be performed in accordance with relevant laws, regulations and technical standards.

2.5 Respect for Persons

Directors, officers, employees and contractors should approach dealings with other persons equitably and with respect. This involves:

- Courtesy and responsiveness in dealing with others;
- Fairness in supervision and dealing with other staff;

- Avoiding behaviour that may be perceived as harassment, bullying or intimidation; and
- Understanding and responding to the needs of our business partners, shareholders and other stakeholders.

2.6 Company Assets

Company property must not be removed without authorisation or used for personal benefit or any other improper use.

Directors, officers, employees and contractors in possession of Company property should maintain adequate security over the equipment.

2.7 Gifts, Favours and Bribery

The Company and its employees and contractors must not seek, accept or provide gratuities where the provider of the gratuity is using the gratuity to obtain advantage or retain business, or obtain and retain a business advantage that is not legitimately due.

The Company will allow acceptance of low value gifts and entertainment provided they are appropriate in the circumstances, do not have the potential to embarrass the Company and are consistent with local customs and traditions.

2.8 Political Involvement

The Company will not participate in party politics and must not make payments to political parties.