

## **CODE OF ETHICS AND CONDUCT**

### **1. Purpose**

This document summarises the core principles and values to be implemented by the Board, officers and employees in dealing with third parties, including government authorities, creditors, joint venture partners and the community as whole as well as other employees.

It is supplemented by the Code of Conduct and Policy on Dealings in Securities.

### **2. Commitment to the Code of Conduct**

The Company is dedicated to delivering outstanding performance for investors and employees. In achieving this objective, all Directors, officers and employees are expected to act with honesty, integrity and responsibility and maintain a strong sense of corporate social responsibility. In maintaining its corporate social responsibility the Company will conduct its business ethically and according to its values, encourage community initiatives, consider the environment and ensure a safe, equal and supportive workplace.

### **3. Responsibility to Shareholders and the Financial Community Generally**

The Company is committed to delivering value to its shareholders and to representing the Company's growth and progress truthfully and accurately. The Company also complies with the laws and regulations that govern shareholder's rights.

The Company is committed to safeguarding the integrity of financial reporting and as such will openly promote and instigate a structure of review and authorisation designed to ensure the truthful and factual presentation of the Company's financial position. The Company will prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws and regulations in Australia.

### **4. Responsibility to Third Parties**

Every employee has an obligation to use their best efforts to deal in a fair and responsible manner with all of the Company's third parties. The Company regards ethics, honesty and clear communication as the cornerstones of its reputation and allow the Company to build successful and lasting business relationships.

### **5. Employment Practices**

The Company will:

- Provide a workplace that is safe for employees and that complies with workplace health and safety laws.

- Promote equal opportunity for all employees at all levels of the Company irrespective of colour, race, gender, age, ethnicity or religious beliefs.
- Provide equal opportunity to all qualified individuals in recruitment compensation, promotion, training and other employment practices.
- Compensate all employees in a fair and ethical manner and where appropriate, in accordance with Company policy.
- Encourage employee share ownership within policy guidelines relating to trading of those securities, where employees have inside information.
- Provide opportunities for employee training and education both through the provision of training and the support of employees pursuing further education outside of the Company.
- Recognise the need from time to time to give or accept customary business courtesies in accordance with ethical business practices; however, employees will not solicit such courtesies and will not accept gifts, services, benefits or hospitality that might influence, or appear to influence, the employee's conduct in representing the Company.
- Not tolerate the offering or acceptance of bribes, inducements or unauthorized commissions by any of its employees or officers.
- Not tolerate the misuse of Company assets or resources and employees will not use such assets or resources for their own benefit.
- Seek to avoid conflicts of interest so that an employee's interests, or the interests of a family member of an employee, do not affect the way he or she handles the Company's business.
- Not tolerate employees being under the influence of illegal drugs or alcohol while on the Company's premises, property or on Company business.

## **6. Responsibilities to the Community**

### *6.1 The Environment*

The Company is committed to conducting its business in accordance with applicable environment laws and regulations. To this end, the Company encourages all employees to have regard for the environment when carrying out their duties.

### *6.2 Community Activities*

All employees are encouraged to engage in activities beneficial to their local community. While normally these activities will occur outside work hours, employees may occasionally engage in community activities during work hours with the approval of the Managing Director as long as the activities do not interfere with the employee's job responsibilities.

## **7. Responsibility to the Individual**

### *7.1 Privacy*

The Company receives private information from its employees. Unless required by law, such personal information will not be shared with a third party without the consent of the employee.

Within the Company, personal information on employees will only be provided on a “need-to-know” basis and will only be used for the purpose for which it was intended.

Similarly, the Company will often be furnished with personal information from investors. Unless required by law, such personal information will not be shared with a third party without the consent of the person providing the information.

### *7.2 Confidential Information*

All employees (including past and present employees) must maintain the confidentiality of business information and protect it from any disclosure. Information that must be kept confidential includes: internal, confidential or proprietary information related to the Company’s business, technological and other knowledge processes, computer passwords, computer software, product formulations, business strategies and plans, and information concerning the Company’s operations, suppliers and employees.

### *7.3 Conflicts of Interest*

Where an individual’s private interests vary in any way with the interests of the Company as a whole, a conflict of interest exists. Employees and Directors must avoid conflicts between personal interests and the interests of the Company. Where an employee or Director is concerned that there may be a conflict of interest the matter should be discussed with the Chairman as soon as