

CODE OF CONDUCT POLICY FOR EXECUTIVES AND EMPLOYEES

Scope

To ensure employees have a clear understanding of the company's expectations of their conduct.

Detailed Policy

Conflict of Interest

A conflict of interest may arise where the interests of an employee interferes or appears to interfere with the interests of the company as a whole.

To avoid such conflicts arising, employees are obliged to:./

- advise their manager of any material interest or proposed material interest that they may have in a customer, supplier or service provider;
- seek prior approval from the company before agreeing to become a director of any other company, which, by virtue of the size or nature of its activities, or time commitment involved, may create a conflict of interest;
- not seek or accept offers of gifts, money or favours which might influence or appear to influence the making of any business decisions;
- not be involved in any other business or position that may result in them not being able to carry out their duties and responsibilities to the company; and
- Employees are encouraged to raise with their manager any concerns they may have as regards to a conflict of interest.

Insider Trading

Our Company, Directors, executives or staff are not permitted to deal in the company's securities if they are in possession of material information, which is not available to the share market, but if it were, it may impact the value at which the securities are traded.

Generally, but always subject to the above, directors, senior executives and employees are restricted from dealing in the company's shares during the period commencing

- 1st January until midday Australian Eastern Standard Time (AEST) on the next business day after the day on which the half-year results are released; and
- 1st July until midday AEST on the next business day after the day on which the full-year results are released.

Directors are obliged to report any dealings in the company's securities pursuant to agreements entered into with the company.

Compliance with Laws

The board is committed to compliance with all relevant legislation and corporate policies. Employees are expected to be aware of all legislation and policies applicable to their position and be sufficiently familiar with such laws and policies that they are able to comply.

Management and employees are responsible to ensure that they:

- have access to all relevant laws and policies;
- are properly instructed on the relevant laws and policies; and
- maintain their understanding, through continuing education and periodic updates.

Relevant laws include but not limited to:

- Trade practices;
- Environmental;
- Occupational health and safety;
- Privacy;
- Corporations Act;
- Industrial Relations; and
- Equal Opportunity and anti discrimination.

Confidentiality and Privacy

Any confidential information about the company or its suppliers, customers, contractors or shareholders must not be used improperly.

Prior to the use of or release of confidential information, written approval must be obtained from an employee's manager.

Employees must maintain the privacy of customers, other employees and shareholders and only use information for the purpose for which it was collected.

Employees are not to make public comment about the company in such a way that implies that they are speaking on behalf of the company, unless their position includes such responsibility.

Employees who leave the company continue to be obliged to maintain the confidentiality of information relating to the company. Such information cannot be used or given to others without prior written approval of the company.

Treatment of Colleagues

Employees must treat other employees, customers, suppliers, contractors and members of the public with respect and courtesy in a fair, honest and open manner.

Employees must ensure that they do not harm, defame, slander or wrongly discriminate against any person. Discrimination or harassment may occur because of a person's sex, marital status, pregnancy, age, race, colour, ethno-religious background, descent or national identity, disability, homosexuality and transgender.

Political Contributions and Activities

- Contributions

No political donations will be made by the company without the prior approval of the board. Such donations will only be made if the board determines that it is in the best interests of the company to make such donations.

- Activities

Employees being involved in political or community activities must ensure that no conflict arises with their position in the company and no confidential company information is used in such political activity without prior written approval of the CEO or COO of the company.

Political activity includes being a candidate for federal, state or local government; being a member, fundraiser or spokesperson for a political party, cause or lobby group, or being publicly involved in a well-publicised community issue.

Gifts and Entertainment

- **Gifts**

Situations may arise where it is appropriate to give a corporate gift or goodwill gesture, recognising a significant occasion (eg. an overseas delegation). A senior manager's approval is required and in any case the gift should be modest and appropriate for the occasion.

- **Entertainment**

Similarly, entertainment may be appropriate where persons outside the company are involved. If the expense is to be borne by the company, a manager senior to the most senior person attending the function must first approve, in principle, the expenditure and the actual expenditure.

Employees in such situations should be cautious of not compromising the company's position in any way through attending/organising such functions.