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## CODE OF CONDUCT

### INTRODUCTION

The purpose of the Code of Conduct is to guide and enhance the conduct and behaviour of the Company's Directors, senior executives, officers, employees and contractors ("Personnel") in performing their everyday roles. The code encourages and fosters a culture of integrity and responsibility with the focus of augmenting our reputation as a valued employer, business partner and corporate citizen, in all our relationships.

This Code of Conduct sets out the principles and standards which the Board, senior executives and Personnel of the Company are encouraged to strive towards when dealing with each other, shareholders, other stakeholders and the broader community.

The Board and senior executives are committed to conducting themselves with integrity and honesty in accordance with this Code of Conduct.

### THE CODE

#### Compliance

- All Personnel must comply with all applicable laws, rules and regulations of the country in which they operate.

#### Conflicts

- Conflicts of interest are to be avoided, and any actual or potential conflict is to be reported to the Managing Director. Personnel must not exploit their position with the Company for personal gain. Personnel must not have a significant ownership interest in any enterprise which may compromise loyalty to the Company.
- Personnel have a duty to bring business opportunities identified through the use of Company property, information or position to the attention of the Company.

#### Fair dealing

- All dealings with customers, suppliers, competitors, employees and other stakeholders of the Company are to be conducted with honesty, integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

#### Company assets and property

- All assets of the Company are to be properly used in the interests of the Company and must be safeguarded from loss and misuse.

#### Knowledge and information

- The accuracy, use and handling of information is critical to the Company's integrity and reputation.
- Personnel must ensure that information is recorded by them honestly and accurately and is made known to their relevant supervisor so as to enable the Company to meet its obligation to keep the market fully informed about its activities.

- Personnel must never make improper use of knowledge, information, documents or other company resources obtained in the course of employment with the Company. Personnel must respect the confidentiality and observe the privacy of information about the Company, its customers and fellow Personnel. The security and proper use of customer and company information is mandatory.
- Personnel must use computer facilities appropriately. Unauthorised use, manipulation or other interference will be treated seriously. For example, private passwords to computer files should be kept confidential, and unauthorised access to confidential information is prohibited.

### **Confidential information**

- Confidential or commercially sensitive information must not be disclosed without proper authorisation.

### **Disclosure and securities trading**

- Continuous disclosure obligations are to be met in accordance with the Company's Continuous Disclosure Policy. All Personnel should familiarise themselves with the Company's Continuous Disclosure Policy.
- Securities trading must be conducted in compliance with the Company's Securities Dealing Policy. All Personnel should familiarise themselves with the Company's Securities Trading Policy.

### **Health, safety and environment**

- The Company is committed to protecting the health and safety of its Personnel.
- The Company is committed to protecting the environment in the conduct of its operations.
- All health, safety and environmental obligations and good practices are to be recognised, respected and adhered to.

### **Employment practices**

- The Company subscribes to good employment practices, specifically:
  - all employment practices are to be fair and non-discriminatory;
  - a safe system of work is to be maintained;
  - all forms of discrimination and harassment are prohibited; and
  - the privacy rights of all individuals associated with the Company are to be respected.

### **Gifts and entertainment**

- All business entertainment received or provided is to be reasonable and properly authorised. Gifts may only be accepted which are not in cash or equivalent, are of small value, and are appropriate to the business relationship. All Personnel must not under any circumstances make offers of, or receive, bribes or other improper payments.

### **Reporting**

- Any matter which a Personnel believes to be a breach of a law or this Code, is to be brought to the attention of the Personnel's supervisor, who is in turn responsible for contacting senior executives or the Managing Director for guidance.
- Any person reporting such breaches will be protected from retribution.

- If reporting to a supervisor does not result in satisfactory action or is not considered likely to result in satisfactory action, any Personnel may report suspected breaches to the Managing Director or the Chairman of the Board.