

CODE OF CONDUCT

This code of conduct aims to encourage the appropriate standards of conduct and behaviour of the directors, officers, employees and contractors (collectively called the **employees**) of the Company.

Employees are expected to act with integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

I. General Principles

- a. Employees of the Company must act honestly, in good faith and in the best interests of the Company as a whole.
- b. Employees have a duty to use due care and diligence in fulfilling the functions of their position and exercising the powers attached to their employment.
- c. Employees must recognise that their primary responsibility is to the Company's shareholders as a whole and must act responsibly and be accountable for their actions.
- d. Employees must protect the assets of the Company to ensure availability for legitimate business purposes and ensure all corporate opportunities are enjoyed by the Company.
- e. Employees must avoid conflicts of interest by not placing themselves in situations which result in divided loyalties.
- f. Employees must not:
- take advantage of their position for personal gain, or the gain of their associates;
- enter into any arrangement or participate in any activity that would conflict with the Company's best interests or negatively affect the Company's reputation;
- take advantage of the property or information of the Company for personal gain or to cause detriment to the Company; and
- knowingly participate in any illegal or unethical activity.
- g. Directors have an obligation to be independent in their judgements.
- h. Confidential information received by employees in the course of the exercise of their duties remains the property of the Company. Confidential information can only be released or used with specific permission from the Company.

Employees have an obligation, to comply with the spirit as well as the letter, of the laws and regulations applicable to the Company and its operations, the principles of this code and also in conjunction with the Company's Whistleblower Policy.

The Company views breaches of this code as serious misconduct. Employees who have become aware of any breaches of this code must report the matter immediately to their line manager or the Company Secretary. The line manager or Company Secretary has the responsibility to report the breach to the appropriate senior management and to advise the relevant employee of the outcome and actions implemented.