

CODE OF CONDUCT

1. PURPOSE

This Code of Conduct sets out the standards with which all directors and employees are expected to comply when representing the company.

Under the Code all directors and employees are required to:

- comply with the law;
- act honestly and with integrity;
- not place themselves in situations which result in a conflict of interest;
- use the company's assets responsibly and in the best interests of the company;
- be responsible and accountable for their actions.

2. OBLIGATION TO COMPLY WITH CODE

Directors and employees shall adhere to the Code. Adherence to the Code is a term of employment with the company. Violation of the Code by any employee, or unethical behaviour which may affect the reputation of the company may be subject to disciplinary action including termination of employment.

3. COMPLIANCE WITH LAWS

The company and its employees shall comply fully with the laws and regulations which govern its operation, its business environment and its employment practices. Employees shall not knowingly participate in any illegal or unethical activity.

4. CONFLICTS OF INTEREST

Where a conflict of interest arises or may arise, an employee shall disclose the conflict to the Company Secretary or the Managing Director. Depending upon the nature and extent of the conflict, measures shall be taken promptly to ensure that the conflicted or potentially conflicted employee does not participate in the relevant decision or activity, or disclosing the conflict to third parties affected by the conflict and ensuring that the conflicted or potentially conflicted employee is not the sole decision maker on the matter.

Directors of the company or its subsidiaries are guided by the Constitution of the company or the subsidiary and shall ensure that they abide by the provisions in the Corporations Act governing conflicts of interest. In case of doubt, the Company Secretary shall consult the Chairman.

5. CORPORATE OPPORTUNITIES

Employees shall not take advantage of company property, information or their position, or opportunities arising from these, for personal gain or to compete with the company.

6. USE OF COMPANY ASSETS

The company's assets must be acquired, maintained and used in an efficient manner and for legitimate business purposes.

7. CARE AND DILIGENCE

The company and its employees shall exercise due care and diligence in the performance of their duties and responsibilities. This shall include such activities as ensuring the accuracy of all decision-making information, attending to detail in all aspects of work, being mindful of the sensitivities of others, protecting confidentiality and being courteous, open and honest.

8. FAIR DEALING

The company and its employees shall comply with relevant laws and regulations concerning employment, such as anti-discrimination, equality of employment, health and safety. The company shall endeavour to ensure that all employees are treated fairly, equitably and honestly.

9. CONFIDENTIALITY

Employees shall not breach the company's confidentiality or make use of confidential information obtained for personal gain or in a manner which would be detrimental to the company.

Confidential information shall not be used except in ways which are authorised or legally mandated. The same applies to confidential information belonging to third parties which an employee may obtain in the course of their duties. Confidentiality provisions are a condition of contracts with employees, consultants, contractors and other service providers. The company respects the confidentiality of its employees and third party information it receives. The handling of third party information collected is regulated by the company's Privacy Policy.

10. REPORTING OF UNLAWFUL OR UNETHICAL CONDUCT

Employees are encouraged to report any violations of this Code of Conduct to the Managing Director. Depending on the severity of the behaviour, at the Managing Director's discretion, the issue may be raised and discussed at Board level if required. Where an employee wishes to raise a concern or conflict issue that involves a senior executive, it shall be directed to the Chairman's attention.