

CODE OF CONDUCT

1. INTRODUCTION

The purpose of the Code of Conduct is to guide and enhance the conduct and behaviour of the Company's directors, officers, employees and contractors 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.

The Company's Code of Conduct underpins the way the Company wishes to operate and should be understood and abided by all concerned.

2. THE CODE

2.1 Respect for Persons

Directors, officers, employees and contractors should approach dealings with other persons equitably and with respect. This involves:

- (a) Courtesy and responsiveness in dealing with others.
- (b) Fairness in supervision and dealing with other staff by valuing colleagues and their personal commitment to meet shared objectives.
- (c) Encouraging cooperation and engaging rational debate to accomplish alternative points of view.
- (d) Acting ethically and responsibly.
- (e) Avoiding behaviour that might reasonably be perceived as harassment, bullying or intimidation.
- (f) Understanding and responding to the needs of our business partners and their stakeholders.

2.2 Respect for the Law

Directors, officers, employees and contractors should respect the law and act accordingly by observing and respecting the laws, customs and business methods of all countries in which we operate to the extent that we adhere to the underlying principles of our Code of Conduct.

2.3 Integrity

Directors, officers, employees and contractors should consistently maintain their integrity whilst carrying out their duties by avoiding conflicts between their private interest and their responsibilities with respect to:

- (a) Personal, financial and sexual relationships.
- (b) Receipt of gifts and other benefits that may create an obligation.
- (c) Use of confidential information obtained in the course of your duties.
- (d) External activities and public comment

2.4 Diligence

Directors, officers, employees and contractors should carry out their roles

in a professional and conscientious manner. This involves:

- (a) Endeavouring to achieve highest standards of performance and adhering to professional codes of conduct where possible.
- (b) Exercising care for others in employment-related activities.
- (c) Taking responsibility for all issues for which we have control.
- (d) Reporting fraudulent or corrupt activities.

2.5 Economy and Efficiency

Directors, officers, employees and contractors should carry out their roles in a cost effective and responsible manner. This includes:

- (a) Using the Company's equipment only for authorised Company business.
- (b) Avoiding waste of Company resources.
- (c) Maintaining adequate security over the Company's property and resources;

2.6 Conflicts of Interest

Directors, officers, employees and contractors should seek to avoid financial, business or other relationships which might be opposed to the interests of the Company or which may conflict with the performance of their duties.

In the event that a conflict arises between the relevant person's financial, business or other relationships and the interests of the Company, the relevant person must notify the Company Secretary in writing, who in turn shall inform the Board of the conflict as soon as practicable. The notice should detail the nature and extent of the potential conflict.

Where a relevant person has any doubt about conflicts of interest, the relevant person shall contact the Company Secretary.

A Director must give the other Directors notice if they have an interest in matters that relate to the Company's affairs that may give rise to a conflict. The disclosure must detail the nature and extent of the interest, be recorded in the minutes of the directors' meetings and be referred to the Chairman for determination. If the conflict involves the Chairman, the non-affected directors must make a determination which must be minuted.

2.7 Breaches of Code of Conduct

The Company Secretary is responsible for the investigation of any possible breaches of the Code of Conduct with findings presented to the Chairman and/or the Board as appropriate.

2.8 Review of Policy

This Policy will be periodically reviewed to ensure it is operating effectively and to determine whether any changes are required.