

Code of Business Conduct

1 Purpose

This Code of Conduct details the basic conduct and behaviour expected of all directors, officers, employees and contractors in performing their everyday roles.

The Code encourages and fosters a culture of respect and compliance with laws and regulations, integrity, maintaining high standards of professionalism, ethics and behaviour in the exercise of duties with the focus of augmenting the Company's 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 *Laws and Regulations*

The Company is subject to local, State and Federal laws of the countries in which we operate. Directors, officers, employees and contractors should respect the law and act accordingly.

No one can be directed to carry out an illegal act and no one can justify an illegal act by claiming to be acting under the order of a Manager or to be simply complying with a policy.

2.2 *Integrity*

Directors, officers, employees and contractors are expected to conduct themselves with integrity whilst carrying out their duties by avoiding conflicts between their private interests and their responsibilities, be fair and honest in their dealings and treat others with dignity. They should recognise and communicate any limitations that would preclude responsible judgement or successful performance of an activity of the Company and report any fraudulent or corrupt activities to the Audit Committee.

2.3 *Confidentiality*

Directors, officers, employees and contractors should refrain from disclosing to any person any confidential or sensitive information acquired in the course of their work except when authorised to do so, or unless legally obliged to do so.

2.4 *Competence*

Directors, officers, employees and contractors should maintain an appropriate level of professional competence by ongoing maintenance and technical development of their knowledge and skills. Their duties should be performed in accordance with relevant laws, regulations and technical standards.

2.5 *Respect for Persons*

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

- Courtesy and responsiveness in dealing with others;
- Fairness in supervision and dealing with other staff;
- Avoiding behaviour that may be perceived as harassment, bullying or intimidation; and
- Understanding and responding to the needs of our business partners, shareholders and other stakeholders.

2.6 *Company Assets*

Company property must not be removed without authorisation or used for personal benefit or any other improper use.

Directors, officers, employees and contractors in possession of Company property should maintain adequate security over the equipment.

2.7 *Economy and Efficiency*

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

- Using the Company's property and equipment only for authorised company business;
- Avoiding waste of the Company's resources; and
- Maintaining adequate security over the Company's property and resources.

2.8 *Gifts, Favours and Bribery*

The Company and its employees and contractors must not seek, accept or provide gratuities where the provider of the gratuity is using the gratuity to obtain or retain business, or obtain or retain a business advantage that is not legitimately due.

The Company will allow acceptance of low value gifts and entertainment provided they are appropriate in the circumstances, do not have the potential to embarrass the Company and are consistent with local customs and traditions.

2.9 *Political Involvement*

The Company will not participate in party politics and must not make payments to political parties.

2.10 *Anti- money laundering*

The Company is committed to complying with all laws relating to the prevention of money laundering and terrorist financing. The Company is committed to complying with all laws relating to the prevention of money laundering and terrorist financing. We will screen and assess our partners and other third party services as considered appropriate to identify money laundering and terrorist financing risks.

2.11 Modern Slavery

The Company is committed to:

- Taking steps to identify, mitigate and prevent modern slavery and ethical sourcing risks in the Company's business operations and supply chain;
- Ensuring compliance with local, national and other applicable laws and regulations relating to modern slavery including the *Modern Slavery Act 2018* (Cth);
- Ensuring transparency in the Company's own business and in its approach to tackling modern slavery risks throughout its supply chains; and
- Working with our suppliers to ensure they are aware of, and comply with, our expectations in regards to modern slavery.

Directors, officers, employees and contractors are expected to carry out their duties in a manner that is consistent with the above commitments.