

CODE OF ETHICS AND CONDUCT

The company has adopted a Code of Ethics and Conduct for all employees and directors of the company and its related companies which details policies, procedures and guidelines aimed at maintaining high ethical standards, corporate behaviour and accountability across the group. Given the diversified nature of the company's operations, individual business units may adopt their own codes of conduct with specific relevance to the areas in which they operate. The directors of the company are also obliged to comply with the Code of Conduct for Directors referred to elsewhere on this site.

Objective

The Code of Ethics and Conduct confirms that the company's primary objective is to provide a satisfactory return to shareholders. The company aims to achieve this by:

- Satisfying the needs of customers through the provision of goods and services on a competitive and professional basis;
- Providing a fulfilling and safe working environment for employees, rewarding good performance and providing opportunities for advancement;
- Contributing to the growth and prosperity of Australia by conducting existing operations in an efficient manner and by searching out opportunities for expansion;
- Responding to the attitudes and expectations of the communities in which the group operates and placing strong emphasis on achieving sustainable development and protection of the environment; and
- Acting with integrity and honesty in dealings both inside and outside the group.

Values

All employees are expected to:

- Respect the law and act in accordance with it;
- Respect confidentiality and not misuse group information, assets or facilities;
- Value and maintain professionalism;
- Avoid real or perceived conflicts of interest;
- Act in the best interests of shareholders;
- By their actions contribute to the company's reputation as a good corporate citizen which seeks the respect of the communities and environments in which it operates;
- Perform their duties in ways that minimize environmental impacts and maximize workplace safety;
- Exercise fairness, courtesy, respect, consideration and sensitivity in all dealings within their workplace and with customers, suppliers and the public generally; and
- Act with honesty, integrity, decency and responsibility at all times.

The Code of Ethics and Conduct covers various topics including responsibilities to shareholders and financial markets, customer and supplier relations, employment practices, responsibilities to the community, and privacy.

Under the Code of Ethics and Conduct, all employees are required to comply with the letter and spirit of all applicable laws and regulations in all jurisdictions in which the group operates in performance of their duties and their dealings with fellow employees, customers, suppliers and all third parties with whom they have contact in the performance of their duties. In addition, all employees have a responsibility to adhere to the Code and ensure that no breaches occur. An employee who breaches the Code may face disciplinary action. If an employee suspects that a breach of the Code has occurred or will occur, he or she must report that breach to the appropriate business, division or company manager. No employee will be disadvantaged or prejudiced if he or she reports in good faith a suspected breach. All reports will be acted upon and kept confidential.

Responsibility for the administration, implementation and periodic review of the Code of Ethics and Conduct lies with the Company Secretary, in consultation with the Managing Director and with advice from the Human Resources Department.