Summary of Code of Conduct

1 Purpose and application
The Board has established a Code of Conduct, which sets out what the Company regards as acceptable business practices for its directors, employees, consultants and contractors, with the aim of ensuring that the Company delivers on its commitment to not only act in compliance with its legal obligations, but also to act ethically and responsibly, which involves acting with honesty, integrity and in a manner that is consistent with the reasonable expectations of investors and the broader community.

2 Obligations
The Code of Conduct sets out the Company’s directors, employees, consultants and contractors obligations:
(a) to act in the Company’s best interests, act honestly and with personal integrity;
(b) to comply with laws and regulations and not knowingly participate in any illegal or unethical activity;
(c) to avoid conflicts of interest;
(d) not to take advantage of the Company’s property or information;
(e) not to take advantage of their position for personal gain; and
(f) and responsibilities to employees (equal employment opportunity, supporting diversity, respecting human rights; safe workplace and maintenance of proper occupational health and safety practices, a workplace free from any kind of discrimination, bullying, harassment or other inappropriate behaviour) and responsibilities to the community and the environment.

3 Bribery and corruption
The Code of Conduct sets out the Company’s policies on bribery and corruption and prohibits bribery and corruption, in any form, whether direct or indirect, whether in the private or the public sector in any place that the Company operates.

4 Whistleblower Policy
The Board has also adopted a Whistleblower Policy to encourage the persons to whom the policy applies (directors, employees, consultants and contractors of the Company) to raise any concerns or report instances of any potential breach of law, any violations (or suspected violations) of the Company’s Code of Conduct or any other legal or ethical concern without the fear of intimidation or reprisal.

5 Review
The Board will review the Code of Conduct at least annually, and update it as required.