

CODE OF CONDUCT – ALL EMPLOYEES

Purpose

1. The Group is committed to acting as a good corporate citizen while it pursues its business objectives. In order to achieve this, it is important that every employee conduct themselves with the highest ethical standards. This Code of Conduct sets out the ethical standards expected of all employees of the Group.
2. Breaches of this Code may result in disciplinary action against the employee including dismissal in serious cases.
3. If you have any queries regarding this Code, you should contact your supervisor or the Company Secretary.

Honesty and Integrity

4. Our reputation as a good corporate citizen can only be achieved and maintained if we act with honesty and integrity in all our dealings with the Group's customers, suppliers and competitors, as well as our work colleagues.
 - (a) We give honest and accurate information, not knowingly make false statements, or mislead directly or by omission, in all communications.
 - (b) We perform our responsibilities with care, diligence and good faith.
 - (c) We respect all people we have dealings with.
 - (d) We report any possible dishonest or fraudulent behaviour by our colleagues or customers to our supervisor or the Group Secretary.

Conflicts of interests

5. A conflict of interest occurs in situations where an employee's personal or professional interest runs contrary to, or may appear to run contrary to, his or her duties and responsibilities to the Group.
 - (a) We seek to avoid situations involving actual or potential conflicts of interests.
 - (b) We do not participate in employment or other activities outside of our employment with the Group which cause conflict of interest.
 - (c) We disclose to our supervisor any matter or interests we have which may lead to actual or potential conflict of interest.
 - (d) We do not manage an account where an actual or potential conflict of interest exists. For example, we do not manage our own account with the Group, or that of our families.

Personal gains and gifts

6. We accept gifts and other benefits, and make use of Group properties, with caution, and only within the following guidelines.
 - (a) We do not accept gifts, benefits or favours which may be seen as excessive and beyond socially acceptable boundaries.
 - (b) We do not accept commissions or payments which may be seen as bribery or fraud.
 - (c) We use the services and facilities provided to us by the Group only for the purpose and in accordance with the terms on which they have been provided.

Confidentiality

7. We respect the confidentiality of information obtained in the course of our employment with the Group, even after our employment with the Group ceases.
- (a) We do not disclose information to third parties about the Group, its customers and suppliers, or other parties obtained during our employment, unless authorised by our supervisor or required by the law to do so.
 - (b) We do not use confidential information for personal gain, including for the gain of our families and friends.
 - (c) We only access confidential information for authorised and necessary work purposes.
 - (d) We respect the privacy of all people, and will do everything reasonably within our power to protect the confidentiality of information obtained by us in the course of our employment, including proper storage of information and protection of computer passwords.
 - (e) We refer all media enquiries to authorised Group employees, and do not respond directly.

Compliance with the law and Group policies

8. We respect the law and are committed to the adherence to the spirit, as well as the letter, of all applicable laws and regulations.
- (a) We do not breach any law or regulation, including insider trading laws, directly or indirectly, whether by action or omission.
 - (b) We understand and comply with this Code as well as all other policies of the Group.
 - (c) We report to our supervisors, or another appropriate authority within the Group any matters which we believe, in good faith, to constitute fraud, corruption, misconduct or other contraventions of the law.
 - (d) We co-operate fully with any internal investigations or external law enforcement agencies if required.

Professionalism and work environment

9. In addition to acting ethically, we seek to continually improve the quality of our work and our work environment.
- (a) We actively engage in continuing education to improve the skills and knowledge relevant to our work, and to strive to deliver exceptional work and customer service.
 - (b) We treat our work colleagues with respect, and do not discriminate on the grounds of a person's race, gender, religion, marital status, sexual preferences or disability.
 - (c) We do not tolerate harassment, including sexual harassment or offensive language, or any form of bullying.
 - (d) We cooperate with other colleagues to create a safe and healthy workplace.
 - (e) We do not perform any work task if we are under the influence of alcohol or drugs.

Adopted by the Board of Directors on the 22nd day of March 2010.

Colin Bloomfield
Chairman of the Board of Directors