

1 Code of Conduct for Employees

Each Company employee should apply the principles of this Code to relationships with each other, with our employer and with all those with whom we deal in our work for the Company. Our Code is a guide for the way we operate.

In representing the Company, we will abide by the following minimum standards:

We treat each other with respect and dignity

- ✘ We maintain a safe and fair work environment
- ✘ Everyone is entitled to be treated with respect as a person, regardless of role or individual differences
- ✘ We value our people and their personal commitment to delivering value to shareholders
- ✘ We encourage co-operation, learning and growth in all who work with us
- ✘ We strive to understand and respond to the needs of the Company's stakeholders

We respect the law and act accordingly

- ✘ We respect the laws, customs and business practices of the communities in which we operate, but do not compromise the principles embodied in this Code
- ✘ We notify the Managing Director (or equivalent) or another Board member immediately of any breach of law
- ✘ In interpreting the law, we adopt a course which preserves integrity

We are fair and honest in our dealings

- ✘ We are fair and honest even when we believe others will not know of our actions
- ✘ Honesty, for us, means not using coercive or misleading practices or falsifying or wrongfully withholding information
- ✘ We do not place ourselves in situations where our private interests could conflict directly or indirectly with our obligations to the Company
- ✘ We do not accept benefits such as gifts or entertainment when the situation could be seen as creating an obligation
- ✘ We do not act in ways which may cause others to question our loyalty to the Company

We use the Company's property responsibly and in the best interests of the Company and its reputation

- ✘ We do not use Company funds to provide unreasonable benefits such as gifts or entertainment for ourselves or others
- ✘ We use the Company's property for the Company's business purposes

We are responsible for our actions and accountable for their consequences

- ✘ We take personal responsibility for all issues over which we have control and the manner in which these are achieved

We are responsible to the community and to the individual

- ✘ We use our best endeavours to ensure a safe work place and maintain proper occupational health and safety practices
- ✘ We recognise and respect our responsibilities to the communities in which we operate

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- ✦ We recognise the rights of the individuals and to the best of our abilities will comply with the applicable legal rules regarding privacy, privilege and private and confidential information
- ✦ We do not tolerate harassment, discrimination or bullying in the workplace

2 Code of Conduct for Directors and Executives

All directors and executives will act in accordance with the following:

- ✦ Actively promote the highest standards of ethics and integrity in carrying out their duties for the Company
- ✦ Disclose any actual or perceived conflicts of interest of a direct or indirect nature of which they become aware and which they believe could compromise in any way the reputation or performance of the Company
- ✦ Respect confidentiality of all information of a confidential nature which is acquired in the course of the Company's business and not disclose or make improper use of such confidential information to any person unless specific authorisation is given for disclosure or disclosure is legally mandated
- ✦ Deal with the Company's customers, suppliers, competitors and each other with the highest level of honesty, fairness and integrity and observe the rule and spirit of the legal and regulatory environment in which the Company operates
- ✦ Protect the assets of the Company to ensure availability for legitimate business purposes and ensure all corporate opportunities are enjoyed by the Company and that no property, information or position belonging to the Company or opportunity arising from these are used for personal gain or to compete with the Company
- ✦ Report any breach of this Code of Conduct to the Report & Investigation Officer, who will treat reports made in good faith of such violations with respect and in confidence