

1. COMMITMENT TO THE CODE

This code of conduct details the Company's commitment to maintaining and developing relationships with its key stakeholders and the community. We are all responsible for the Company achieving the highest levels of business conduct. All Company directors, executives and employees are accountable for acting in line with the policies and standards outlined in this code.

This document should be read in conjunction with the Company's Corporate Governance Protocol, which outlines the full obligations of the Company in respect of good corporate governance.

2. RESPONSIBILITIES TO SHAREHOLDERS

The directors of the Company recognise the expectation of shareholders that their funds will be applied in a manner that realises a superior return on investment and that, in pursuing this aim, the directors will perform their duties with honesty, integrity, care and diligence, according to the law and in a manner that reflects the highest standards of governance.

The Company will comply with the disclosure obligations contained in the Listing Rules of the Australian Stock Exchange and in doing so will immediately notify the market by announcing to the stock exchange any information in relation to the business of the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities. Our commitment to these disclosure requirements is detailed in the Continuous Disclosure Policy.

The Company also has policies in place to ensure honesty and integrity in financial reporting so that shareholders have access to accurate information that reflects the true financial position of the Company. Further information on the Company's audit committee and commitment to truthful financial reporting is found in the Company's Corporate Governance Protocol.

3. RESPONSIBILITIES TO CLIENTS, CUSTOMERS AND CONSUMERS

The directors of the Company recognise the importance of forthright communication as a key element in building external relations. To maintain these relationships, the Company must earn the trust of customers, clients and consumers by being forthright in its communication and consistently delivering on its commitments. Additionally, the Company is committed to developing relationships which focus on the creation of value for all parties.

The Company will always endeavour to offer the highest levels of product quality, safety and service to its customers to ensure the maintenance of reputation and the creation of long lasting and enduring relationships. The products offered by the Company will represent fair value, further consolidating the market position held by the Company.

4. EMPLOYMENT PRACTICES

The Company is committed to developing, implementing and maintaining management systems for health, safety and the environment that are consistent with the Australian standards and enable us to embrace diversity, enriched by openness, sharing, trust, teamwork and involvement in the workplace.

Health and Safety

The Company places the highest value on being a responsible and caring employer. To achieve this, we are committed to providing operations where it is possible to work free of injury and illness, and to developing our people to make safe decisions when going about their day-to-day jobs. Safety procedures should never be compromised. Putting safety procedures second to production is inconsistent with this. Employees should first consider discussing the situation with a supervisor or management. The Company will not tolerate retribution against employees who raise genuine concerns. All accidents should be immediately reported and investigated promptly so that the Company can take the necessary action to prevent similar incidents in the future.

Workplace Environment

The Company knows its success is dependent upon its staff. Accordingly, it is committed to ensuring that all its employees are paid at rates that are at or above the legal minimum wherever we operate.

The Company is also committed to developing a diverse workforce and to providing a work environment in which everyone is treated fairly and with respect regardless of gender, race, ethnic origin, religion, marital status, sexuality or other status. Discrimination and harassment in any form is unacceptable and is regarded by the Company as serious misconduct. Employees should discuss any such situation with their supervisor or management.

Employment with the Company must be offered and provided based on merit. All employees and applicants for employment should be treated and evaluated according to their job-related skills, qualifications, abilities and aptitudes only.

Employee Security Trading Policy

Employees of the Company must not use the knowledge gained in their position for personal gain or the gain of their associates. All employees are obliged to ensure that all transactions in the Company's securities comply with the law and applicable rules and regulations of ASX. Accordingly, all transactions by employees in the Company's securities must comply with the Company's Code of Practice.

Employees who hold shares under the Company's employee share or long term incentive plans must also comply with the rules of those plans when undertaking transactions in those shares.

Whistleblower Provisions

The Company is committed to achieving high standards of conduct and ethical behaviour in all of its activities. The Company supports that commitment by ensuring that individuals can report actual or suspected misconduct without fear of reprisal. The Company is also committed to full compliance with the protective provisions provided under the Corporations Act in respect of such reporting.

Further information on the Company's compliance with these provisions is found in the Company's Whistleblower/Fair Call Policy. The Company considers the Whistleblower/Fair Call Policy to be an important tool for uncovering any misconduct and deterring individuals from committing future acts of misconduct. A copy of the Whistleblower/Fair Call Policy can be obtained from the Human Resources Department.

5. OBLIGATIONS RELATIVE TO FAIR TRADING AND DEALING

The Company operates in accordance with the principles of the Trade Practices Act which is designed to promote competition in business and to protect the interests of consumer. These laws generally outlaw anti-competitive agreements or understanding between competitors, certain 'exclusive' supply or distribution arrangements, misuse of market power to damage competition, anti-competitive mergers and misleading or deceptive conduct. The laws are strictly enforced by the Australia Competition and Consumer Commission. Breaches of competition laws carry potentially serious consequences for the Company and for employees or other individuals who may be involved. Penalties include fines which may run to many millions of dollars. Businesses or consumers who are damaged by unlawful conduct can sue to recover damages as well.

Conduct in breach of these laws is strictly prohibited and must be avoided. Reference should be made to Company management for further information and guidelines on the scope and requirements of competition laws applicable to the Company.

6. RESPONSIBILITIES TO THE COMMUNITY

The Company has an overriding commitment to environmental responsibility and sustainable development. Particularly the Company is committed to continuous improvement in its environmental management and intends to work closely with key stakeholders to reduce environmental impact and improve community and supplier education and awareness.

7. RESPONSIBILITIES TO THE INDIVIDUAL

Confidentiality

The Company will only collect personal information from its employees ethically and lawfully. It also seeks to collect information in a fair manner, and in a way which is not unreasonably intrusive. Employees must ensure that the confidentiality of personal information contained in Company records is strictly maintained. Any individual collecting personal information on behalf of the Company must inform the person involved of the purpose for which the information is collected and be aware that, subject to some limitations, employees will be able to gain access to the information collected on request.

Further information on the Company's approach towards personal information is found in the Company's Privacy Policy. This policy is located on the Company's website.

Conflicts of Interest

Employees should not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between their personal interests and the interests of the Company. Such circumstances could compromise or appear to compromise the employee's ability to make impartial business decisions. If there is any doubt, an employee should disclose an issue to their supervisor to ensure that it can be adequately considered.

There should be no acceptance and giving of personal gifts or hospitality, other than gifts of nominal value or reasonable hospitality given in the ordinary course of business. Any agreement or understanding regarding favours or benefits in exchange for gifts must be avoided.

All directors of the Company must comply with these principles.

8. COMPLIANCE WITH LEGISLATION

The Company directors, executives and employees must comply with the spirit of all laws and regulations relating to their business conduct. This includes understanding the laws and regulations relevant to the work and relations of the Company.

The Company's senior management is responsible for providing clear instructions to employees in their business about how to deal with conflicts between particular laws and the Company policies. If an employee finds that a policy conflicts with the jurisdiction in which they operate, it should be reported to their supervisor or management.

9. APPLICATION

This Code is to be applied by all Company directors, executives and employees. Questions about the application or meaning of this Code, or potential violations should be reported to Company management.