

Whistle Blower Policy

From 1 July 2004, the Corporations Act protects any officer or employee of the Company and a contractor of the Company or an employee of that contractor from any civil or criminal liability, contractual liability or victimization arising from the disclosure of information relating to the contravention of the Corporations Act by the Company or by an officer or employee of the Company. To be protected by the whistle blowing provisions, the discloser must have reasonable grounds to suspect that the information indicates that the contravention has or may have occurred and must have disclosed it to ASIC, the auditor or an officer of the Company.

General Conduct

Directors, executives, officers and employees must:

- not make unauthorized gains or payments. As a general rule, the Company's directors, executives, officers and employees should not accept or offer to give gifts, services, discounts, gratuities or other gains from (or to) people who conduct business with the Company. This principle has particular application where the Company is involved in a tender. Although small gifts or invitations to local social or sporting functions are generally acceptable, the offering of bribes to anyone is prohibited outright. Breaking this principle could compromise all concerned.
- only use company assets as authorized. The Company's assets are critical to business competitiveness and success. These assets include office equipment, computer systems, the data on those systems (including the passwords allowing access to that data), the Company's brands and corporate charge cards. The Company assets are provided to for conducting the Company's business. Any use of these assets must be authorized.
- not make unauthorized public statements. Great care must be taken in public speaking engagements, media releases and official appearances.
- treat customers, consumers, the community and suppliers with the utmost respect, integrity and honesty and must strive to deliver a superior performance in conducting their duties.
- not make unauthorized political donations on behalf of the Company. Managers or supervisors may only make political donations. This does not, of course, restrict the rights of employees to attend political functions in a personal capacity.
- help each out fellow workers and work collaboratively and, within the bounds of commercial confidentiality.

Compliance

All instances of non-compliance with the Code are to be reported:

- in the first instance, to the manager or supervisor of the business unit/department of the person to which the report relates (which, in the case of a director is the Board); and
- where the instance of non-compliance constitutes a serious breach of the Code, to the Company Secretary.
- Instances of non-compliance which constitute a serious breach of the Code include any conduct or event involving impropriety which:
 - constitutes fraud;
 - may have a serious business impact on the Company; or
 - may seriously compromise the reputation of the Company.
- Where appropriate, the Company should refer the report of serious non-compliance to the:
 - the Audit Committee (e.g. where the misconduct is an allegation of fraud); and/or
 - the Board.

Consequences of Non-compliance

The Company is committed to ensuring that all directors, executives, officers and employees of the Company comply with the Code. All instances of non-compliance with the Code are treated seriously by the Company and may result in the Company taking disciplinary action, including dismissal or removal of the person(s) concerned.

Review

The Company Secretary will conduct an annual review of the Code to ensure that the Code continues to reflect the letter and spirit of all applicable laws and regulations and the Company's commitment to its staff and the community. Directors and employees of the Company are encouraged to report any difficulties or challenges encountered by them in complying with the Code (including any inconsistencies between the Code and the business initiatives of the Company) to the Company. This will assist in the evaluation of the effectiveness of the Code and will highlight any areas of the Code that may require amendment or additional guidance.