



Code of Ethics and Business Policy

Introduction

This Code of Ethics and Business Conduct ("Code") has been approved by the Board for use within the Company and its controlled entities. The Company is committed to conducting business both ethically and legally throughout its operations. This Code summarises the Company's core values and the ethical principles and legal policies that assist in this endeavour.

The principles in this Code are to provide directors and employees with a guide to help them in ensuring that sound, ethical decisions are made that are in the best interests of the Company. It must be recognised that the Code does not provide a set of rules to cover every situation or challenge that may be faced. Directors and employees should understand the principles laid out in this document and use them to guide their individual behaviour and in doing so set an example for others to follow.

Departures from this Code are not acceptable. Directors and employees must strive to maintain the high standards of business ethics and personal integrity the Code requires and they are expected to become familiar with the Code and to apply these principles in the daily performance of their responsibilities

Code of Ethics

The Company believes in the importance of working and living according to strong ethical values. Integrity and business honesty is the basis of all these values.

As a company and as individuals, we must ensure that we have the conviction to embrace the highest standard of integrity and ethical behaviour: We must promise only what we can reasonably expect to deliver. We must strive to keep our commitments. We must not engage in activities that create, or even appear to create, conflict between our personal interests and the interests of the Company.

Code of Conduct

Employees

Fair and Equitable Treatment

The Company is committed to provide a work environment that promotes personal achievement, continual learning, and a feeling of self-worth.

Respect for Individuals

The Company believes that employees deserve to be treated with dignity, trust and respect, so that the full value of each individual's contribution can be realised under these principles.

Job Performance

Employees are selected and employed based on their personal qualifications and skills for the job. Employees are expected to give their best efforts, learn from their successes and setbacks, and pursue opportunities to improve their performance on their own initiative. The Company encourages self-development and it will assist employees in mastering their current

jobs and improving their job skills. It rewards employees based on the quality of the work they do and the contributions they make to both the Company and their work environment.

Employee Health and Safety

The Company actively promotes the health and safety of employees. It believes a safe working environment is paramount and that a healthy, productive workforce contributes significantly to the Company's performance and success.

Diversity

It is a strict policy of the Company that there is to be no discrimination against any prospective Board member or employee on the basis of gender, age, ethnicity or cultural background. Commitment to diversity will promote an environment conducive to the appointment of well qualified employees and Board candidates so that there is appropriate diversity to maximise the achievement of corporate goals. The company currently has two employees and a Board of only three members. One of the employees is female. In reviewing prospective candidates for Board positions the Nominations Committee is required to consider any candidate who has a broad experience in the finance and investment sectors.

Dealing with Third Parties

The Company's strength and longevity are the result of the ability to sustain long-lasting, mutually rewarding relationships with shareholders and others with whom the Company does business. Directors and employees must continuously work to strengthen these relationships, to listen, learn, and innovate through conscientious trustworthy behaviour and constant attention to the results and quality of their work.

Investor Relationships

The Company grows by constantly promoting the long-term interests of its owners, the shareholders. This is achieved through sustained growth, profitability and protection of assets. In accordance with continuous disclosure requirements the Company keeps investors, share markets and the general public informed on a timely basis through public release of relevant information about the Company. The Company Secretary/Chief Financial Officer is the Board's delegated representative to release information to the Australian Securities Exchange. In releasing information about the Company, every effort must be made to ensure that full disclosure is made to everyone without preference or favouritism to any individual or group of investors.

Conflict of Interest

The Company recognises and respects the rights of directors and employees to maintain financial interests in outside investments, directorships, businesses or other activities so long as those activities are legal and do not impair, interfere or conflict with the conscientious performance of their Company duties and do not involve damage or misuse of the Company's name or reputation.

In all business relationships with outside persons or organisations, and in all personal business undertakings, directors and employees of the Company are required to avoid personal transactions, situations or involvements in which their personal interests conflict with or have the appearance of conflicting with those of the Company.

Safeguarding Assets

To remain competitive and to serve the interests of its shareholders, the Company endeavours to preserve, protect and responsibly use all of its assets. Directors and employees have a personal responsibility to safeguard the Company's assets from loss, theft, or misuse, and to use every available means, electronic, technical, physical, procedural, and legal, to protect the assets at all times.

Directors and employees are expected to protect the company's intellectual assets, such as confidential financial information and other sensitive corporate and personal information, through careful attention to interpersonal communication, the secure use of all communications media and, where appropriate, legally enforceable agreements.

Unauthorised disclosure of sensitive information belonging to the Company must not be made either during employment by the Company or thereafter.

Improper Payments

In dealing with public officials, other corporations, and private citizens, all Company personnel adhere to ethical business practices. No director or employee is to be influenced by, or seek to influence others, either directly or indirectly, by paying or receiving bribes or kickbacks, or by any other measure that is unethical or will tarnish our reputation for honesty and integrity. Even the appearance of such conduct must be avoided.

Directors and employees must not accept gifts, favours, or entertainment that obligate or appear to obligate us to act in any way contrary to the law or our own ethical business practices

Financial Reports and Accounting Records

Investors and others have a legitimate interest in the Company's financial and accounting information. The integrity of the financial reporting and accounting records is based on validity, accuracy, and completeness of basic information supporting entries to the Company's books of account. Employees must ensure that every accounting or financial entry accurately reflects that which is described by the supporting information. The Company expects employees involved in creating, processing, or recording such information to be personally responsible for its integrity. Employees have a responsibility to ensure that false or intentionally misleading entries are not made.

Inside Information and Share Trading

Any director or employee who has undisclosed information about the Company must not use it for personal gain or provide it to others. Directors and employees must comply with the Company's Trading Policy which specifies the periods during the year where, in accordance with the ASX Listing Rules, trading in the Company's shares is generally prohibited.
