



POLICY NAME:	Code of Business Conduct
EFFECTIVE FROM:	17 June 2005
Last Revised	3 September 2008

### **1.0 Purpose**

The purpose of the Code of Business Conduct is to provide guidance for our behaviour when representing Hastie Group.

### **2.0 Objectives**

- a) Promote honesty and integrity in all our business activities.
- b) Provide employees with a safe and productive workplace free from harassment and discrimination.
- c) Encourage employees to consider their behaviour and uphold the Hastie Group values in all their actions.
- d) Encourage employees to abide by the laws governing the countries, states and territories in which we operate.
- e) Ensure all employees utilise Hastie Group's resources for the benefit of the company.
- f) Promote business success by the pursuit of competition within the regulatory rules.
- g) Operate our businesses to minimise adverse environmental impact.

### **3.0 Scope**

The Code of Business Conduct and policies and procedures outlined in this document apply to all employees of Hastie Group, including the Board, management and employees, and must be adhered to.

### **4.0 Business Integrity**

Hastie Group conducts its business with honesty, integrity and respect for the interests of its stakeholders.

Hastie Group will act as a responsible corporate citizen and actively support the communities in which we live and work and encourage our employees to actively contribute to the needs of those communities.

Hastie Group does not give or receive bribes in order to obtain or provide business, services or financial advantage.

## **5.0 Obeying the Law**

Hastie Group is committed to being a good corporate citizen and this involves complying with applicable laws and regulations of each jurisdiction in which Hastie Group operates.

## **6.0 Conflicts of Interest**

Hastie Group expects its employees to avoid any personal, financial or other conflicts of interest that could compromise the performance of their duties.

Employees and directors will disclose any actual, potential or perceived conflicts of interest which occur internally or externally.

## **7.0 Competition**

Hastie Group believes that fair competition should exist in all markets where we conduct business. We support the liberalisation of markets and the application of appropriate competition laws.

## **8.0 Public and Political Activities**

Hastie Group neither supports political parties nor contributes to the funds of groups whose activities promote political interests.

## **9.0 Responsible use of assets**

All employees are expected to protect information provided to Hastie Group and ensure that the resources of Hastie Group are used only for the benefit of the company in accordance with the policy for "Use of Company Assets".

## **10.0 Insider Trading**

Hastie Group does not engage in insider trading. Refer to the policy for "Dealing in Securities".

## **11.0 Personal Conduct**

Hastie Group does not discriminate on the basis of race, religion, sex, marital status, disability, age, or on any other grounds prohibited by law. We are committed to maintaining a workplace that is free from all forms of harassment and discrimination.

## **12.0 Safety in the Workplace**

Hastie Group is committed to providing a safe and healthy workplace for all employees, contractors and visitors. Hastie Group also recognises the responsibilities and requirements placed upon it by various State, Federal and Country specific Occupational Health and Safety legislation and codes of practice and will adhere to these principles.

## **13.0 Limitations of Authority**

Hastie Group will establish levels of authority for its employees in our Delegation of Authority and Contract Approval Policy.

## **14.0 Professional Competency**

Hastie Group provides training and development opportunities and encourages all employees to develop themselves to achieve their full potential and also meet the needs of the business.

## **15.0 Personal Accountability**

Hastie Group requires all employees to accept and discharge with conviction all responsibilities that are contained in the role for which they are employed.

## **16.0 Drugs and Alcohol**

Hastie Group requires all employees to be free from the influence of drugs and alcohol when at work.

## **17.0 Fraud**

Fraud is a deliberate deception made with the intention of gaining an unjustified or illegal benefit or other dishonest advantage. Hastie Group does not tolerate fraudulent activity against the interests of the company or any other person. Hastie Group may prosecute employees where it has reasonable grounds to suspect fraud.

## **18.0 Failure to Comply**

Any employee failing to comply with the Hastie Group's Code of Business Conduct will be in breach of company policy and may be subject to disciplinary action, including termination of employment.

## **19.0 Reporting**

Hastie Group employees have an obligation to report any violation or apparent violation of the Code of Business Conduct. If appropriate, employees are encouraged to work with supervisors or management in making a report. The escalation procedure for employees reporting alleged violations should be to their manager or business general manager in the first instance, to the Company Secretary in the second instance, to the Group Managing Director and CEO in the third instance and then to the Chairman of the Board in the final instance. If employees perceive the violation or apparent violation to be by their immediate supervisor or manager, then employees are encouraged to take the matter to the level above.

Reports will be handled confidentially. Employees who make a report in good faith will not be subject to indignity or retaliation.