

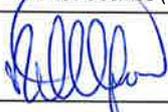
The Directors, Senior Managers and employees of the A.G. Coombs Group of Companies are expected to observe high standards of business ethics and behave with integrity in their conduct. In all our operations and relationships we will adopt and adhere to the Core Values and our Code of Conduct as follows:-

I will:

- Act ethically and with honesty and integrity.
- Act according to the legislative requirements, policies and ethical codes and observe and comply with Company Policies and Procedures.
- Not engage in any fraudulent or corrupt behaviour and comply with all laws and regulations concerning anti-bribery, anti-corruption and prohibited business practices.
- Make decisions fairly, impartially and promptly, considering all available information.
- Treat others with the same respect, courtesy, honesty and fairness and have proper regard for their interests, rights, safety and welfare.
- Contribute to a harmonious, safe and productive work environment by our work habits, and professional workplace relationships.
- Not harass, bully or discriminate against any employees, colleagues, customers/clients.
- Not intentionally use derogatory or abusive language in the workplace.
- When needed, deliver constructive criticism respectfully, professionally and in private.
- When needed, receive constructive criticism, listen and consider the feedback in a respectful and professional manner.
- Ensure the business activities of any Company within the A.G. Coombs Group of Companies are conducted in a manner displaying a high degree of professionalism. This includes personal presentation, communications and documentation.
- Ensure the contracts which the A.G. Coombs Group of Companies undertakes are observed from a corporate and individual perspective.
- Not misuse information for personal or commercial gain for me or someone else.
- Conduct all meetings in a business like format with consideration given to the timing, venue, agenda and follow up.
- Respect the time of our clients, colleagues and employees by being punctual, returning messages promptly and notify the appropriate person/s of our whereabouts.
- Exercise efficient time management when completing tasks, thereby actively contributing to our team's success and the success of the Company and our clients.
- Respect the confidentiality and privacy of all information as it pertains to the Company, its Employees and Clients.
- As an employee of the A.G. Coombs Group of Companies exercise discretion in all business relationships.

This Policy applies to all employees within the A.G. Coombs Group of Companies as follows:

A.G. Coombs Group Pty Ltd ♦ A.G. Coombs Pty Ltd ♦ A.G. Coombs Advisory Pty Ltd ♦ A.G. Coombs Servicing Pty Ltd
A.G. Coombs (NSW) Pty Ltd ♦ A.G. Coombs (QLD) Pty Ltd ♦ Integrated Technical Management Pty Ltd ♦ Walker Fire Protection Pty Ltd

Approved:		Policy Number: P-04 (Ref. System 10)
Name	Russell F. Telford, Managing Director	Version: 5.0 May 2018

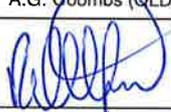
- Not disclose confidential information or documents acquired through my work, other than as required by law or where proper authorisation is given.
- Ensure the secure storage of sensitive and/or confidential information.
- Respect all Company equipment, supplies, books and records containing information.
- Not display offensive material within any office area/work site, or download/store such material on any Company provided electronic device such as a computer/laptop, iPad, PDA or mobile/smart phone.

All employees of the A.G. Coombs Group of Companies shall contribute in a constructive and positive way to enhance good governance and the reputation of the Group. They will be responsible for reporting (in line with company procedures) any improper conduct or misconduct which has been, or may be occurring in the workplace.

Any breaches of the Code of Conduct should be reported to the Executive Manager Employee Services and/or Managing Director.

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Name	Russell F. Telford, Managing Director	Version: 5.0 May 2018