

Principle 4 – Promote Ethical and Responsible Decision-Making

BEST PRACTICE RECOMMENDATIONS

The Company established and implemented a Code of Business Ethics, which endeavours to influence and guide the Directors, employees and other representatives on the practices necessary to maintain confidence in the Company's integrity and to demonstrate the commitment of the Company to ethical practices. The following is a summary of the content of this Code of Business Ethics:

1. Dealing with stakeholders
2. Dealing with competitors
3. Dealing with Communities
4. Dealing with Company assets
5. Conflicts of interest
6. Confidentiality – restricting the use of non-public information except where disclosure is authorised or legally mandated.
7. Fair dealing – by all employees with the Company's customers, suppliers, competitors and employees.
8. Compliance with laws and regulations – active promotion of compliance.
9. Whistle-blowing policy
10. Internal Notification procedure
11. Encouraging the reporting of unlawful/unethical behaviour – active promotion of ethical behaviour and protection for those who report violations in good faith.

The Code of Business Ethics (to be included)

The Code of Customer Confidentiality (in place)

The Company has further established and implemented a Trading Policy, concerning trading practices in Company securities by directors, officers and employees of the Company. The Trading Policy contains the following:

1. Identify and raise awareness about the prohibitions under the law and the requirements of the policy.
2. Specify whether there is any restriction to permit trading by designated officers in specific circumstances, details of such circumstances, and the basis upon which discretion is applied.

[The Trading Policy](#)