Principle 7 – Recognise the Legitimate Interests of Stakeholders

BEST PRACTICE RECOMMENDATIONS

- 1. The Company established and implemented a Code of Business Ethics, which endeavours to guide the Company's compliance with legal and other obligations to legitimate stakeholders within the following framework:
 - a) Clear commitment by Board and management to the Code of Business Ethics. This is often linked to statements about the aspirations or objectives of the Company, its core values, and its views about the expectations of customers, shareholders, staff and the broader community.
 - b) Responsibilities to shareholders and the financial community generally This includes reference to the Company's commitment to delivering shareholder value and how they will do this, the Company's approach to accounting policies and practices and disclosure.
 - c) Responsibilities to clients, customers and consumers This includes reference to standards of product quality or service, commitments to fair value, safety of goods produced and code of practice adopted with regard to the maintenance of confidentiality of customer information.
 - d) Employment practices. and ethical behaviour This includes reference to ethical behaviour, occupational health and safety; employment opportunity practices; special entitlements above the statutory minimum; employee security trading policies; training and further education support; policies on giving and acceptance of business courtesies; prohibitions on the offering and acceptance of bribes; inducements and commissions; misuse of Company assets and resources; handling of conflicts of interest and on outside employment.
 - e) Obligations relative to fair trading and dealing This includes reference to the policy concerning the trading practices in the Company's securities by its directors, and employees in keeping with the applicable laws and regulations.
 - f) Responsibilities to the Community This includes environmental protection policies, support for community activities, donation or sponsorship policies.
 - g) Responsibilities to the individual This includes the Company's privacy policy, the use of privileged or confidential information, how conflicts of interest are addressed.
 - h) How the Company complies with legislation affecting its operations. The Code of Business Ethics should state whether the Company's operations comply with regulatory and legal requirements regarding:
 - trade practices and fair dealing laws;
 - consumer protection;
 - customer confidentiality and respect for privacy;

- employment law, occupational health and safety, equal employment opportunity;
- environment and pollution controls.
- i) How the Company monitors and ensures compliance with its Code of Business Ethics The Company should have a system for ensuring compliance with its Code of Business Ethics and for dealing with complaints. The Board shall set the tone and standards of the Company and to oversee adherence to the Code of Business Ethics, which states the values and policies of the Company and complements the Company's risk management practices.
- 2. Engage in consultations with the Government and Authorities in furtherance of its commitment to public or social accountability based on notions of legitimacy, fairness and ethics.

<u>The Code of Business Ethics</u> (to be included)