

CODE OF CONDUCT POLICY

Overview

Recommendation 3.1 says companies should establish a code of conduct and formulate policies on appropriate behaviour by directors, senior executives and employees and disclose the policy or a summary of that policy (if it is not disclosed, why it is not disclosed must be explained in the annual report).

This document provides an overview of the Code of Conduct expected of QMASTOR Limited Group directors, senior management and staff. This document is not intended to address all circumstances and forms part of the QMASTOR core policies.

Policy	
1. Purpose	<p>Our Code of Conduct is a statement of our corporate ethics and philosophy, and underpins our business decisions, actions and behaviour. The Code provides clear guidelines to directors, senior management and staff so that there is a common understanding of the values and expected standards of behaviour for all.</p> <p>QMASTOR’s reputation for honesty and integrity is valuable to the Company and its shareholders, and therefore must be maintained and protected at all times.</p> <p>The objective of the Code is to make sure that high standards of corporate and individual behaviour are observed in conducting the business of QMASTOR, and to provide support for those behaviours.</p>
2. Standard of Conduct	<p>All QMASTOR directors, senior management and staff will:</p> <ol style="list-style-type: none"> 1. Actively promote the highest standards of ethics and integrity in carrying out their duties for the Company. 2. Disclose any actual or perceived conflicts of interest of a direct or indirect nature of which they become aware and which they believe could compromise in any way the reputation or performance of the Company. 3. Respect confidentiality of all information of a confidential nature which is acquired in the course of the Company's business and not disclose or make improper use of such confidential information to any person unless specific authorisation is given for disclosure or disclosure is legally mandated. 4. Deal with the Company's customers, suppliers, competitors and each other with the highest level of honesty, fairness and integrity. 5. Ensure all consultants, contractors and partners working with or for QMASTOR are informed of relevant policies and standards and of the requirement that they act in accordance with them. 6. Only accept and give token gifts and modest hospitality and professional courtesies and never accept or give a gift or courtesy that could either lead to, or be seen to lead to, a conflict of interest such that our judgment is prejudiced or improperly influenced.

7. Protect the assets of the Company to ensure availability for legitimate business purposes and ensure all corporate opportunities are enjoyed by the Company and that no property, information or position belonging to the Company or opportunity arising from these are used for personal gain or to compete with the Company.

8. Observe the rule and spirit of the legal and regulatory environment in which the Company operates. Where uncertainty exists as to what laws apply advice should be sought from the relevant manager or from the Managing Director and/or Company Secretary.

9. Be familiar with the contents of this policy and have a detailed understanding of all policies and standards that directly relate to their role/s.

10. Report any breach of this code of conduct to their supervisor, manager or Managing Director, as appropriate who will treat reports made in good faith of such violations with respect and in confidence.

3. Reaffirming the Code of Conduct

To ensure that there is a high level of awareness and understanding of the Code of Conduct, all Directors, senior management, staff and contractors will be asked to read and affirm their support:

- On appointment
- At annual performance reviews
- In the event of a promotion
- At relevant planning meetings
- Whenever the code is amended