

CORPORATE CODE OF CONDUCT

This Corporate Code of Conduct (“Code”) sets out the standards which the directors, officers, managers, employees and consultants (together “Personnel”) of United Overseas Australia Ltd and its subsidiaries (“Company”) are expected to comply in relation to the affairs of the Company’s businesses when dealing with each other, shareholders and the broader community.

Compliance

1. All Personnel must comply with all applicable laws, rules and regulations.
2. Where necessary, Personnel must, after consultation with the Managing Director/Chief Executive Officer (“MD/CEO”) seek appropriate legal advice.

Conflicts

1. Conflicts of interest are to be avoided and any actual or potential conflict is to be reported to the MD/CEO. Personnel must not exploit their position with the Company for personal gain. Personnel must declare to the MD/CEO a significant ownership interest in any enterprise which may compromise loyalty to the Company.
2. Personnel have a duty to bring business opportunities identified through the use of Company property, information or position to the attention of the Company.

Fair Dealing

All dealings with customers, suppliers, competitors, employees and other stakeholders of the Company are to be conducted with honesty, integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

Company assets and property

All assets of the Company are to be properly used in the interest of the Company and must be safeguarded from loss and misuse.

Knowledge and Information

1. The accuracy, use and handling of information is critical to the Company’s integrity and reputation.
2. Personnel must ensure that information is recorded by them honestly and accurately and is made known to their relevant supervisor so as to enable the Company to meet its obligation to keep the market fully informed about its activities.
3. Personnel must never make improper use of knowledge, information, documents or other company resources obtained in the course of employment with the Company. Personnel must respect the confidentiality and observe the privacy of information about the Company, its customers and fellow Personnel. The security and proper use of Company information is mandatory.
4. Personnel must use computer facilities appropriately. Unauthorised use, manipulation or other interference will be treated seriously. For example, private passwords to computer files should be kept confidential and unauthorized access to confidential information is prohibited.

Confidential Information

Confidential or commercially sensitive information must not be disclosed without proper authorization.

Disclosure and securities trading prohibited

1. All Personnel must refrain from disclosing any information, documents or any forms of data concerning the Company that a reasonable person would expect to have an effect on the price or value of the Company's securities; or that would be likely to influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.
2. Securities trading must be conducted in compliance with the Company's Securities Trading Policy that Personnel are prohibited from dealing in the Company's securities when those persons possess privileged information.

Health safety and environment

1. The Company is committed to protecting the health and safety of its Personnel.
2. The Company is committed to protecting the environment in the conduct of its operations.
3. All health and safety obligations and good practices are to be recognized, respected and adhered to.

Employment practices

The Company subscribes to good employment practices, specifically:

1. All employment practices are fair and non-discriminatory;
2. A safe system of work is to be maintained;
3. All forms of discrimination and harassment are prohibited; and
4. All privacy rights of individuals associated with the Company are to be respected.

Gifts and entertainment

All business entertainment received or provided is to be reasonable and properly authorized. Only gifts that are not in cash or equivalent, are of small value and are appropriate to the business relationship may be accepted. Personnel must not under any circumstances make offers of, or receive bribes or other improper payments.

Reporting

1. Any matter which Personnel believe to be a breach of a law or this Code, should be brought to the attention of the MD/CEO for guidance.
2. Any person reporting such breaches will be protected from retribution.