

## Code of Conduct

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### 1 Policy

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The Board believes that the integrity and reputation of the Company as a good corporate citizen is crucial to the success and standing of the Company. The Board is therefore committed to promoting throughout the Company the highest standards of legislative compliance and financial and legal behaviour.

Every member of the Board and every employee of the Company must:

- (i) act honestly, in good faith and in the best interests of the Company as a whole;
- (ii) use care and diligence in fulfilling the functions of their office/employment and exercising the powers attached to that office/employment;
- (iii) use the powers of their office/employment for a proper purpose, in the best interests of the Company as a whole;
- (iv) recognise that the primary responsibility is to the Company's shareholders as a whole but should, where appropriate, have regard for the interest of all stakeholders of the Company;
- (v) not make improper use of information acquired as a director or employee of the Company e.g. for personal gain;
- (vi) not accept, or give, gifts or other benefits of significant value or engage in activities that could, or could be perceived, to compromise judgment or objectivity in the performance of duties for the Company;
- (vii) not disclose, or allow to be disclosed, confidential information received in the course of the exercise of their duties (which remains the property of the Company) unless that disclosure has been authorised by the Company or is required by law;
- (viii) not take improper advantage of the position of director or employee of the Company e.g. for personal gain;
- (ix) properly manage any conflict with the interests of the Company;
- (x) not engage in conduct likely to bring discredit upon the Company; and
- (xi) comply, at all times, with the spirit, as well as the letter, of the law and with the principles of this Code of Conduct



## 2 Ethical Principles

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The Board and employees shall promote the following principles within the Company:

(i) Honesty & Integrity

The Company shall operate honestly and with integrity in its dealings with shareholders and other stakeholders in the Company, clients and customers, suppliers, employees and regulatory authorities.

(ii) Competition

The Company shall compete in the markets in which it operates aggressively but fairly and lawfully.

(iii) Privacy

The Company is committed to safeguarding the privacy of parties it transacts with by ensuring their information is protected in a way that observes the Company's corporate values, as well as complying with the requirements of the National Privacy Principles of the Privacy Act (Cth) (1988), as amended.

(iv) Legislative & Other Obligations

The Company will observe the spirit as well as the letter of the laws and codes of conduct etc to which it is subject.

(v) Occupational Health & Safety

The Company shall provide:

- a safe and healthy working environment and safe systems of work for all employees, contractors, clients and other visitors to the Company's work premises.
- appropriate financial resources, equipment, personnel and expertise to enable employees and contractors to carry out their work safely

(vi) Equal Opportunity

All employees and potential employees shall be provided with fair access to employment-related opportunities. All decisions regarding recruitment, promotion, transfers and development shall be based on merit. No person or



group of people will be treated less favourably than another on grounds of race, age, gender, sexual preference, marital status, pregnancy, political opinion, religion, parental status or physical impairment or any other factor not relevant to the work position.

Harassment or discrimination of any kind is not to be tolerated. The best available person will be placed in each vacant position, consistent with legal obligations. The termination of any employee is conducted in a fair, non-discriminatory and dignified manner.

(vii) Environment

The Company will conduct its business so as to minimise undesirable impacts on the environment.

(viii) Community

The Company will, to the extent reasonable, actively participate in the communities in which it operates.

BlackWall will maintain a Reporting of Unacceptable Conduct (Whistleblower) Policy to encourage and facilitate disclosures of fraud or illegal activity occurring in the company.

BlackWall will take action to protect people from victimisation and ensure that they are not subjected to intimidation or discrimination in the workplace.

The Companies Compliance officer has responsibility for monitoring compliance with this. As part of the monitoring process, the Compliance Officer will review all relevant registers and policies and procedures to identify any instances of non-compliance.

As the Board is committed to ensuring ongoing compliance with this Policy it is incorporated in staff training sessions when they commence and on an ongoing basis