



SP Telemedia Limited and its subsidiaries (the “Company”)

Code of Conduct

1. Introduction

This Code of Conduct (the ‘Code’) establishes the ethical standards of conduct and behaviour of the directors, officers, employees and contractors (‘Employees’) in their business dealings. This ethical framework seeks to encourage an environment of professionalism where the highest standards are maintained in the interests of the Company and its shareholders.

2. The Code

2.1 Professional Conduct

Employees shall at all times conduct themselves in a professional manner and ensure all their dealings with third parties are undertaken in an honest and fair manner.

Employees will at all times treat people with integrity and respect and will not discriminate on the basis of race, religion, gender, sexual preference, age, marital status or disability.

Any activity which could be seen as bullying, intimidation or victimisation within the work environment will not be tolerated and may be grounds for disciplinary action including dismissal of the Employee concerned.

2.2 Compliance with the Law

Employees shall at all times abide by the law and act accordingly by observing all laws, regulations and business custom which impact on the Company’s business operations, its reputation or standing in the financial community.

Any concern as to specific legal issues affecting the business operations of the Company must be addressed to the Company Secretary in the first instance.

All Employees must understand the relevant regulatory environment in which the Company operates and act in accordance with the Company’s policies and procedure manuals and attend all training and information sessions as may be required.

2.3 Confidentiality of Information

Employees must at all times keep the Company’s records, reports, papers, processes, plans and know-how confidential unless required under law or legislation and then only to the extent required.

Company records may from time to time include personal information in relation to Employees, suppliers, customers, contractors and potential employees or suppliers. All such personal information is to be managed in a professional manner and is not to be used

for any purpose or disclosed to any third party without the consent of the person concerned unless required under law or legislation.

2.4 Conflict of Interest & Gifts

Employees must constantly monitor their personal interest to ensure they avoid any conflict of interest or situations that may appear to create a conflict of interest.

Employees must not use their position to obtain a personal gain or benefit from suppliers or business associates or those seeking to do business with the Company.

Employees must not offer or attempt to offer an incentive to any supplier or business associate of the Company or receive any incentive where such incentive could be classified as a bribe.

Modest gifts or reasonable entertainment may be received from business partners or associates of the Company providing such gift or entertainment would not be regarded as excessive in the circumstances and is not likely to influence an Employee's judgement or conduct. These gifts are to be provided to HR so that the Company can allocate these fairly to staff.

2.5 Equal Opportunity

The Company will treat all Employees and potential employees according to their skills, qualifications, competencies and potential and will not discriminate on the basis of race, religion, gender, sexual preference, age, marital status or disability.

2.6 Occupational Health & Safety

The Company is committed to the health, welfare and safety of its Employees. The impact on the health, welfare and safety of its Employees forms part of the overall consideration when setting the Company's long term strategic plans and making day to day business decisions.

3. Compliance with the Code

This Code sets out the standards of behaviour which if not followed by Employees may attract a penalty, ranging from counselling to dismissal.

All Employees who are aware of a breach of this Code are responsible for taking action which may include discussion of the matter with management, seeking advice or assistance from the Company Secretary or reporting concerns to the Chief Executive Officer. Any Employee who reports in good faith a breach of this Code will not be subject to retaliation, retribution or other actions for making such a report.