

OLDFIELDS HOLDINGS LIMITED

A.C.N. 000 307 988

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Code of Conduct - Company Stakeholders

OLDFIELDS HOLDINGS LIMITED

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Code of Conduct for Company Stakeholders

Commitment by Board and Management to the Code of Conduct

The Board and Management of Oldfields Holdings Limited will at all times:

- ❑ Act honestly and with integrity;
- ❑ Observe the rule and spirit of the Law;
- ❑ Exercise due care and diligence in fulfilling duties;
- ❑ Act in the best interests of the Company except where to do so contravenes any of the other ethical standards;
- ❑ Avoid any real or perceived conflict of interest;
- ❑ Observe the principles of independence;
- ❑ Respect the confidentiality of all confidential information;

Responsibilities to shareholders and the financial community

Oldfields Holdings Limited is committed to maximising shareholder value, taking into account financial and non-financial matters. In maximising shareholder value the Company commits to prepare financial information in good faith, representing an accurate view of the Company's financial performance. Information will be disclosed as required by the listing rules in a timely and transparent manner.

Responsibilities to clients, customers and consumers

Oldfields Holdings Limited is committed to providing a high quality and value of product and services to our customers. The company will never intentionally mislead stakeholders or willingly provide a product or service that is substandard.

Employment practices

Oldfields Holdings Limited is committed to treating all stakeholders and the wider community fairly and equally. The best interests of employees within the Company will be promoted through training and appropriate consideration for occupational health and safety issues.

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Code of Conduct for Company Stakeholders (Continued)

Responsibilities to the individual

Confidential information in the possession of Oldfields Holdings Limited will be treated with the utmost discretion. No disclosure of this information will be accepted unless the persons concerned have authorised that disclosure, or as required by law.

How the company complies with legislation affecting its operations

Oldfields Holdings Limited will at all times comply with the laws and legislation of the jurisdiction in which it operates. If that jurisdiction has laws and legislation that have requirements that fall below standards accepted by the Company Code of Conduct the company will meet the higher standards.

How the company monitors and ensures compliance with its code

Any behaviour that fails the standards identified in the Oldfields Holdings Limited Code of Conduct is encouraged to be reported to senior management or to the Board. All stakeholders are asked to help maintain highly ethical standards for the company by promptly identifying any behavior considered to be falling below identified (or considered) acceptable standards. Information provided will be treated in a discrete and confidential fashion and the matters dealt with expeditiously.