

OLDFIELDS HOLDINGS LIMITED

A.C.N. 000 307 988

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Code of Conduct for Directors and Company Officers

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Conflicts of Interest

Directors must act in the best interests of the company as a whole. Directors shall engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

Corporate Opportunities

Directors must not take advantage of their position or information acquired, in the course of their duties, or misuse information for personal gain or to cause detriment to the company.

Confidentiality

Confidential information received in the course of the exercise of a Director's duties remains the property of the company and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorized by the Chairman with consideration to the persons concerned, or as required by law.

Fair Dealing

Directors shall act honestly and with integrity in all of their dealings with employees, suppliers, customers and competitors such that the best interests and reputation of the company are maintained and enhanced.

Protection of Assets

Directors must use their best endeavours to protect the company's assets and ensure that those assets are used for business purposes only.

Compliance with Laws and Regulations

Directors have an obligation, at all times, to comply with the spirit, as well as the letter, of the law, including any applicable rules and regulations.

Promotion of Ethical and Lawful Behavior

Directors will at all times strongly encourage legal and ethical behavior. If the Director becomes aware of unlawful or unethical behavior then they are obliged to report such activities to the Chairman. Information provided should be treated in a discrete and confidential fashion and the matters dealt with expeditiously.