

## Code of Conduct

**IPGA Limited ACN 126 188 538**



Level 13, 175 Eagle Street  
BRISBANE QLD 4000  
DX 152 BRISBANE  
Tel: (07) 3002 6700  
Fax 1300 368 717

[www.hwl.com.au](http://www.hwl.com.au)  
Ref: MDR:BJC 88418

**Table of Contents**

- 1. INTRODUCTION .....3
- 2. APPLICATION OF THE CODE.....3
- 3. GOOD CORPORATE CITIZENSHIP .....3
- 4. INTEGRITY, HONESTY & FAIRNESS .....3
- 5. EMPLOYMENT PRACTICES .....4
- 6. TRADING ACTIVITIES .....4
- 7. SEEKING ASSISTANCE.....4

## CODE OF CONDUCT

### 1. INTRODUCTION

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IPGA is a business adopting the highest standards of ethical conduct in accordance with the core principles encapsulated in this Code of Conduct (Code).

### 2. APPLICATION OF THE CODE

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We recognise that our reputation is one of our most valuable assets and is founded largely on the ethical behaviour of the people who represent IPGA. This Code applies to all directors, employees, contractors and consultants of IPGA (**IPGA Personnel**) and compliance with this Code, IPGA policies and the law is a condition of working with IPGA and will serve to enhance our reputation for fair and responsible dealings, and promote high standards of behaviour across our business.

### 3. GOOD CORPORATE CITIZENSHIP

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We recognise that our shareholders, customers and consumers, employees and the communities where we operate rightly expect us to demonstrate corporate responsibility leadership. We do this by:

- (a) observing the letter and spirit of all relevant laws;
- (b) implementing appropriate policies, practices and procedures as required for the efficient and effective operation of the business in a way that is intended to have zero harm to the environment and the communities from which our operations are undertaken;
- (c) adhering to the ASX Principles of Good Corporate Governance.

### 4. INTEGRITY, HONESTY & FAIRNESS

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We are committed to conducting business with integrity, honesty and fairness.

IPGA Personnel are expected to:

- (a) Deal fairly and honestly with customers, suppliers and the community.
- (b) Understand and comply with legal requirements and IPGA policies.
- (c) Avoid actual or potential conflicts of interest and declare any actual or potential conflicts that may arise.
- (d) Never give or receive bribes or kickbacks or any other similar inducements.
- (e) Decline gifts or other benefits that will compromise their independence.
- (f) Only trade in IPGA shares in the approved "trading windows" and in accordance with the IPGA' Share Trading Policy.
- (g) Maintain the confidentiality of business information that they have access to in their work.
- (h) Respect the privacy of individuals and the privacy laws in relation to the collection, use and handling of other people's personal information.
- (i) Use IPGA information and communication tools in an effective, ethical and lawful manner.
- (j) Protect IPGA property and the belongings of others from theft, misappropriation and misuse.

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**5. EMPLOYMENT PRACTICES**

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We value and respect the diversity of our employees and are committed to creating an inspiring workplace where everyone is treated equally and fairly, in which no-one is discriminated against in any way on the basis of characteristics such as gender, age, race, religion, sexual orientation or marital status, and in which no-one is subject to or commits any act of harassment.

We will:

- (a) Not tolerate any form of discrimination or harassment in the workplace.
- (b) Provide employees with performance management processes that will be applied fairly and honestly.
- (c) Recognise achievement and communicate what needs to be done to those who have not performed to expectations.
- (d) Ensure that there are systems and procedures in place to ensure that employees are fit for work and understand their obligations in relation to consumption of alcohol, drugs and prescription medications.

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**6. TRADING ACTIVITIES**

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We support the principles of free competition and will observe the spirit and letter of competition laws. You should exercise high standards of ethical conduct in all business dealings including those with suppliers, customers and consumers regarding our marketing and selling activities, our use of market power, our description of goods and services and the quality and safety of our products.

IPGA Personnel are expected to:

- (a) Never say or do things that are likely to mislead or deceive people.
- (b) Ensure that all of our products and services that we supply to customers, consumers and the community meet IPGA high quality and safety standards as well as those standards required by law.

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**7. SEEKING ASSISTANCE**

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If you have any questions that are not specifically addressed in this Code or any of the IPGA policies referred to in this Code, please ask your manager for advice.

Any breach of this Code is a serious matter that may give rise to disciplinary action including dismissal and legal action. If you are aware of any serious misconduct or unethical behaviour that contravenes this Code, any of IPGA policies or the law, you should report this to your manager.

Any employee who makes a report in good faith will be treated with respect and will not be subject to any retaliation.