



CORPORATE CODE OF CONDUCT

Spectur Limited
ACN 140 151 579

Date Revised:
17 September 2019

1. Preamble

- 1.1 This Corporate Code of Conduct (**Code**) is endorsed by the Board of Directors (**Board**) of Spectur Limited (ACN 140 151 579) (**Company**).
- 1.2 The Code and a comprehensive set of Company Policies embodies objectives which sets out the standards with which the directors, officers, managers, employees and consultants of the Company and its subsidiaries (together **Personnel**) are expected to comply in relation to the affairs of the Company's business and when dealing with each other, shareholders and the broader community.

Spectur's values are:

- **Honesty, respect and integrity** – in how we deal with our customers, community and people.
- **Customer orientation** – we care deeply about providing a great customer experience.
- **Curiosity** – we are inquisitive at heart and will seek to draw out ideas that move us forwards in our journey, wherever they may come from.
- **Leadership** – we behave as leaders, we strive to lead our industry.
- **Performance** – we are high performers and hold ourselves accountable to high standards.

The overriding principles contained in the values are that all employees, including Directors, shall:

- Conduct their duties fairly and honestly
- Treat other stakeholders fairly and without discrimination
- Conduct business on an arm's length basis free of any influences which are inconsistent with the Company's objectives
- Conduct themselves in accordance with the law, The Listing Rules of the Australian Securities Exchange, the Company Constitution, local by-laws and other relevant rules or obligations imposed by organisations which govern the markets or jurisdictions in which the Company operates
- Maintain a safe working environment

It underpins the Company's commitment to integrity and fair dealing in its business affairs and to a duty of care to all employees, clients and stakeholders. The document sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from employees.

- 1.3 The Board approves and endorses the Code.
- 1.4 The Company undertakes to make the Code known and accessible to all Personnel. Its management will strive to ensure that the Code is observed in word and in spirit by all who represent the Company.

2. Compliance

- 2.1 All Personnel must comply with all applicable laws, rules and regulations.
- 2.2 Where necessary, Personnel must, after consultation with the Managing Director, seek appropriate legal advice.

3. Conflicts

- 3.1 Potential for conflict of interest arises when it is likely that you could be influenced, or it could be perceived that you are influenced by a personal interest when carrying out your duties. Conflicts of interest that lead to biased decision making may constitute corrupt conduct. Conflicts of interest are to be avoided and any actual or potential conflict is to be reported to the Managing Director.

Further information on potential conflicts and processes to mitigate any conflicts is contained in Spectur's Code of Conduct statement of Practice.

Personnel must not exploit their position with the Company for personal gain. Personnel must declare to the Managing Director a significant ownership interest in any enterprise which may compromise loyalty to the Company.

- 3.2 Personnel have a duty to bring business opportunities identified through the use of Company property, information or position to the attention of the Company.

4. Fair dealing

All dealings with customers, suppliers, competitors, employees and other stakeholders of the Company are to be conducted with honesty, integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

5. Company assets and property

All assets of the Company are to be properly used in the interests of the Company and must be safeguarded from loss and misuse.

6. Knowledge and information

- 6.1 The accuracy, use and handling of information are critical to the Company's integrity and reputation.
- 6.2 Personnel must ensure that information is recorded by them honestly and accurately and is made known to their relevant supervisor so as to enable the Company to meet its obligation to keep the market fully informed about its activities.
- 6.3 Personnel must never make improper use of knowledge, information, documents or other Company resources obtained in the course of employment with the Company. Personnel must respect the confidentiality and observe the privacy of information about the Company, its customers and fellow Personnel. The security and proper use of Company information is mandatory.
- 6.4 Personnel must use computer facilities appropriately. Unauthorised use, manipulation or other interference will be treated seriously. For example, private passwords to

computer files should be kept confidential, and unauthorised access to confidential information is prohibited.

7. Confidential information

Confidential or commercially sensitive information must not be disclosed without proper authorisation.

8. Disclosure and securities trading

8.1 Continuous disclosure obligations are to be met in accordance with the Company's Continuous Disclosure Policy. All Personnel should familiarise themselves with the Company's Continuous Disclosure Policy a copy of which is provided to each employee and is available on the Company website.

8.2 Securities trading must be conducted in compliance with the Company's Securities Trading Policy. All Personnel should familiarise themselves with the Company's Securities Trading Policy, a copy of which is provided to each employee and is available on the Company website.

9. Health, safety and environment

9.1 The Company is committed to protecting the health and safety of its Personnel and has a Workplace Health and Safety Policy.

9.2 The Company is committed to protecting the environment in the conduct of its operations. The Company has an Environmental Policy.

9.3 All health, safety and environmental obligations and good practices are to be recognised, respected and adhered to.

10. Employment practices

The Company subscribes to good employment practices, specifically:

- (a) all employment practices are to be fair and non-discriminatory;
- (b) a safe system of work is to be maintained;
- (c) all forms of discrimination and harassment are prohibited; and
- (d) the privacy rights of all individuals associated with the Company are to be respected.

The policies also set out requirements with respect to the way staff conduct themselves, their rights to benefits or to claim reimbursement for certain expenses, treatment of gifts and entertainment, the requirement to keep Company information secure and confidential, delegations of authority and are contained within the HR Code of Conduct Statement of Practice provided to all employees.

12. Reporting

Any matter which Personnel believe to be a breach of a law or this Code should be brought to the attention of the Managing Director or the Company Secretary for guidance. Any person reporting such breaches will be protected from retribution.