

APEX FOUNDATION

CODE OF CONDUCT

The Apex Foundation (the Company) recognises that the success of our business and the maintenance of the Company's integrity requires that our personnel pursue the highest standards of ethical conduct at all times.

This Code of Conduct outlines the standards of conduct that are expected by all of the Company's personnel, including directors, employees, contractors and consultants.

The principles expressed in this Code govern our conduct wherever we operate and compliance with this Code is a condition of working for the Company. This Code is designed to supplement detailed Company policies.

1. FAIR DEALING

We will deal ethically, honestly and fairly with our employees, colleagues, members and beneficiaries and avoid any practices which could be seen as deceptive or unfair. We will comply at all times with relevant trade practices and company laws.

2. AVOID CONFLICTS OF INTEREST

We acknowledge that there may be times when our personal or other interests conflict with those of the Company. In these circumstances, we will take action to remove or manage the conflict, so as to avoid detriment to the Company or any perception of conflict of interest.

3. PERSONAL TRANSACTIONS

- We will not use the name of the Company for personal gain.
- We will not use any information gained from our dealings with the Company for personal gain, nor allow any such information to be used for the personal gain of others.
- Any equipment, services, intellectual property or facilities made available to us by the Company will only be used for properly authorised purposes and not for personal gain or illegal purposes.

4. MAINTAIN CONFIDENTIALITY

We will take care to ensure that confidential information about our business, members, beneficiaries and employees is properly protected and not disclosed, except for proper purposes or where required by law.

5. COMPLIANCE WITH THE LAW AND COMPANY POLICIES

We will abide by the law and relevant company policies at all times.

6. RESPONSIBILITY TO THE COMMUNITY

- We aim to be socially responsible in all of our business activities in order to protect and enhance the wellbeing of the communities in which we operate.
- We recognise that we have a responsibility to the Apex organisation and all trust beneficiaries to abide by the conditions and clauses laid down in each trust deed for which the Apex Foundation acts as trustee.

7. RESPONSIBILITIES TO OUR EMPLOYEES

- We are committed to the principle of equal opportunity for all employees without regard to race, colour, age, gender, religion, disability, sexual preference or other matters unrelated to work performance. We will not engage in discrimination, bullying or harassment.
- We are committed to recruiting, training and promoting employees according to competence and capability and providing them with a safe and healthy place of work.

8. BRIBERY AND SECRET COMMISSIONS

We will not engage in bribery of any person or the giving or accepting of secret commissions. Bribery and payment of secret commissions are prohibited by law and will not be tolerated under any circumstances.

9. GIFTS

We will only accept gifts, entertainment or hospitality where offered in the spirit of business courtesy and relationship management. In accepting gifts, entertainment or hospitality, we must acknowledge that, by accepting, we do not feel a sense of obligation to the provider.

All personnel have a duty to disclose the receiving of gifts, entertainment and hospitality, as follows:

- Directors – to the Chairman;
- Chairman – to the Board;
- Executive Officer – to the Chairman and
- All other staff – to the Executive Officer.

The Board, Chairman, and Executive Officer must maintain a register of such disclosures.

10. REPORTING OF BREACHES ENCOURAGED

- All personnel are responsible for promptly raising concerns about breaches of the law, this Code or other unethical behaviour within the Company. Such reports should normally be made to your direct manager. Breaches of the law which become known to a director, must be reported to the Chairman or the Board as a whole.

- Any breaches so reported will be properly investigated and appropriate action taken. Persons who report suspected breaches in good faith shall be protected from victimisation.
- Failure to comply with this Code may lead to disciplinary action, including possible dismissal.

This Code will be reviewed on an annual basis by the Company's Governance, Board of Audit Risk Committee, which shall recommend any appropriate changes to the Board for approval.