

Computershare Group

Code of Ethics

Computershare Group Code of Ethics

1. Introduction

Computershare's reputation for integrity is a precious asset. It is up to each of us to protect and enhance that asset by demonstrating a total commitment to ethical business practices. To promote and safeguard Computershare's reputation, employees of Computershare Limited and any of its related bodies corporate (together referred to as 'Computershare' in this Code) must conduct themselves in accordance with the highest ethical standards. This Code of Ethics is designed to illustrate Computershare's expectations for employee conduct.

2. Promote a Safe and Positive Workplace

Computershare values the diverse backgrounds of its people and seeks to create an atmosphere of trust, honesty and respect. Each employee is expected to treat fellow employees with respect and dignity regardless of gender, race, ethnic origin, religion, marital status or other status. Harassment or discrimination of any kind is unacceptable.

Additionally, Computershare is committed to providing a safe and healthy work environment. All employees are responsible for ensuring that all Computershare operations are conducted safely. Employees are expected to observe any relevant safety rules and practices and follow instructions concerning safe and efficient work practices. All employees should advise their manager or other relevant management representatives immediately if they see a work practice or activity which they consider to be conducted in an unsafe or careless manner. Computershare will not tolerate retribution against employees who raise concerns.

3. Avoid Conflicts of Interest

Employees are expected to make decisions that are in the best interests of Computershare and not for personal gain. Employees must avoid activities that could compromise their judgment or objectivity in the performance of their duties with Computershare. This ability is compromised if they have personal interests or obligations that compete or conflict with Computershare's legitimate business interests.

Computershare employees must not accept gifts or favours of any significant value or give the same to anyone (including clients or suppliers) even though they may believe that it will have no bearing on their actions on behalf of Computershare. Computershare acknowledges that while small courtesies bring important humanity to business dealings, common sense should always be applied to business dealings. In no circumstances may kickbacks, bribes or other illegal consideration be offered, paid, granted, received or accepted by any Computershare employees.

4. Integrity of Financial Information

Shareholders, management and other interested parties must have complete and accurate financial information in order to make informed decisions.

Many Computershare employees participate in the accounting processes that directly impact on the integrity of external financial statements. Employees have a responsibility to ensure that all Computershare financial records are recorded accurately and timely and must immediately report any known inaccuracies. Unrecorded or "off the books" transactions must not be kept for any purpose.

Any act that intentionally conceals or obscures the true nature of Computershare transactions is a clear breach of this Code.

5. Misrepresentation and False Statements

Computershare employees must never make deliberate misrepresentations concerning Computershare or its business operations.

6. Confidential Information

Any confidential information including proprietary, technical and financial information must be protected by Computershare employees and should be handled on a strict need to know basis. Computershare's trade secrets should be appropriately safeguarded.

In the course of their work, Computershare employees may learn of "inside information" about Computershare and other companies. Employees must not use non-public information for personal profit or discuss such information with anyone who does not have a legitimate business reason to know such information.

7. Protection and Use of Property

Computershare employees are responsible for the protection of all Computershare property used in carrying out their tasks and responsibilities. Employees should take reasonable steps to prevent theft, damage or misuse of such property.

Computershare property also includes corporate information and intellectual property such as copyright and trade marks. As Computershare licenses intellectual property from third parties, employees must ensure that property of this kind is protected in accordance with the agreements giving Computershare the right to use such property.

8. Competition Law

All of the business activities in which Computershare is engaged are highly competitive. It is Computershare's policy to compete aggressively but fairly. A major part of this commitment is to abide by applicable trade practices (anti-trust) laws. In general terms these complex laws prohibit Computershare from collaborating with its competitors to restrain or reduce competition or business rivalry. Employees must abide by competition laws intended to ensure and maintain competition in all markets in which Computershare operates. If employees are in a position that is, or may be, sensitive to anti-competitive conduct they should consult with their compliance manager or legal department.

9. Compliance with this Code of Ethics

Failure to adhere to Computershare's Code of Ethics may result in disciplinary action which could include termination of employment in accordance with the terms of the General Conditions of Employment. If employees are concerned whether circumstances could lead to a contravention of this Code, they should discuss this matter with their immediate manager, legal, or compliance, department.