

CAMPBELL BROTHERS LIMITED

SUMMARY CODE OF CONDUCT

Campbell Brothers Limited (CBL) has a professional reputation in the marketplace, and through a strong commitment to our Code of Conduct, our reputation will be enhanced.

In a demanding and ever-changing business world it is essential that the work environment in which our staff are employed is founded on a firm ethical platform based on honesty and integrity.

The management of CBL recognises that certain decisions or actions taken by a CBL employee has the potential to put the reputation of the company at stake. CBL promotes workplaces that ensure staff are free from any commercial, financial or other pressures that may adversely affect the quality and integrity of their work.

CBL are committed to delivering shareholder value by performing our duties in efficient and ethical ways, and at all times meeting the relevant laws and standards that govern the operations of our businesses.

Our Code of Conduct is based on the following principles:

- To maintain the highest standard of personal and professional conduct in our dealings with clients, sub-contractors, vendors and co-workers.
- To encourage and promote the highest level of ethical and professional conduct within our businesses.
- To ensure the protection and proper and efficient use of company assets
- To maintain the confidentiality of privileged or sensitive information and ensure that confidential data are not used for commercial or personal advantage.
- To recognise our responsibility to uphold all laws and regulations governing the policies and activities of our industry.
- To be courteous and professional in our dealings with others in our industry and respect the rights and interests of our competitors.
- To ensure that the company is not involved in activities that would diminish confidence in its competence, impartiality, judgement or operational integrity.