

Summary of the Employee Code of Conduct

The Employee Code of Conduct (**the Code**) provides employees and contractors with guidelines on ethical issues and behavioral standards expected of all employees and contractors across the McMillan Shakespeare Group (**MSL**).

All new employees and contractors are provided with a copy of the Code on commencement with MSL as part of the HR induction process. Once an employee has reviewed the Code and had any queries satisfactorily answered, they sign an acknowledgement of that fact.

The Code covers the following areas:

- Financial integrity.
- Business agreements and contracts.
- Confidentiality of information.
- Privacy and intellectual property.
- Trading in MSL securities.
- Making of public statements.
- Legal compliance.
- Conflicts of interest.
- Fraud, corruption, unauthorised gains and irregular transactions.
- Equal employment opportunities.
- Discrimination and harassment.
- Occupation health and safety.
- Smoking, drugs and alcohol and gambling.
- Inappropriate use of company resources.
- Email and internet use.
- Professional conduct and ethical standards.
- McMillan Shakespeare's value set.
- What to do about suspected fraudulent or unethical behavior.