

1. Policy Statement

Keltech is committed to ensuring that all employees adopt the highest standard of Business Ethics, Integrity and Professionalism in all business practices.

2. Purpose

The Company's objective, for the fulfilment of this policy, is to:

- Provide a benchmark for professional behaviour throughout Keltech;
- Support Keltech's business reputation and relationships with stakeholders; and
- Ensure all employees or persons representing or acting for, or on behalf of the Company, are aware of the high ethical standards expected in relation to their actions.

3. Scope

This policy applies to all staff including persons employed on a full-time, part-time, casual and contractor basis.

4. Responsibility and Authority

4.1 Company Responsibilities and Commitment to Employees

Keltech is committed to providing a workplace where the highest standards of Business Ethics, Professionalism and Integrity are upheld.

The Company is committed to providing a workplace that respects the rights of all employees. We will maintain a workplace that is healthy and safe, fair and honest and free of Harassment, Bullying and Intimidation.

5. CODE OF CONDUCT

5.1 Compliance with and Respect for the Law

All employees must respect and act in accordance with the law. This includes observing and respecting the relevant laws, customs and business methods that apply in the place in which they are working, at any particular time.

5.2 Fair Dealing

Employees are required to perform their duties in a professional manner and act with the utmost Integrity and objectivity, striving at all times to enhance the reputation and interests of Keltech. This should involve, as a minimum:

- Acting within the applicable laws;
- Acting with Integrity and Courtesy;
- Acting with fairness and respect in supervising staff;
- Encouraging cooperation;

- Discouraging and avoiding behaviour that might be perceived as Harassment, Bullying or Intimidation; and
- Understanding and responding to the needs of the Company's broader stakeholders, including the community at large.

5.3 Conflicts of Interest – Employees

All business transactions must be conducted in the best interests of the Company.

A conflict of interest may arise where an employee is involved in multiple interests (financially or otherwise), one of which could possibly affect the motivation for an act in the other, or may prejudice the employee's ability to perform his or her employment duties and responsibilities objectively. This may place him or her in a position where making objective decisions on behalf of the Company is difficult.

Any business dealing or personal matter, which is or has the potential to give rise to a conflict of interest, must be declared to a Manager.

Once the conflict of interest has been declared, the General Manager will prescribe a course of action that may involve cessation of the activity causing the conflict.

5.4 Gifts, Prizes and Entertainment

The Company expects its employees to exercise reasonable judgment and discretion in accepting any gratuity or gift offered in connection with their employment.

Employees must not accept financial inducements, gifts or entertainment from any person if the gift has the potential to place the Company in a position of obligation. Employees must not offer gifts or inducements to any person for the purpose of gaining an unfair or improper advantage.

The following questions must be considered to assess the motivations of the offering party and the accepting party, and whether offering and accepting is appropriate on a case by case basis:

- Does the gift transgress any applicable law or regulation?
- What is the gift being offered, and why is it being offered?
- Could the recipient feel pressure to reciprocate or grant favours as a result of the gift?
- Could acceptance / offering adversely affect the way the employee performs?
- Could acceptance / offering adversely affect the Company's reputation in any way?

6. Use of the Company's Property and Assets

Employees have a responsibility to protect all Company property and assets that are under their control or in their possession and must safeguard them against loss, theft or unauthorised use.

Company property and / or assets shall not be used for personal use without prior approval.

Company property and documents shall not be removed from official premises other than for business related reasons.

Employees ceasing to be employed by the Company must return all property in their possession prior to the completion of their tenure with the Company.

Where an employee purchases property on behalf of the Company, accurate records must be kept and submitted for approval. Employees must comply with prescribed accounting and business procedures and controls at all times.

7. CONFIDENTIALITY AND PRIVACY

7.1 Confidentiality

While employed by the Company, employees will acquire and have access to confidential information. Such information can be in written, verbal or electronic form and includes proprietary or non-public information or information of a commercially sensitive nature concerning Keltech and/or Company business.

All employees are to exercise total discretion towards any third party on all matters concerning the Company, its businesses, policies, management, and employees.

Confidential information includes, but is not limited to:

- Information regarding Company business operations and conditions;
- Employee information and data;
- Client, customer and supplier information;
- Details of negotiations relating to past, current and future transactions;
- Financial, marketing and administrative information;
- Computer software systems specifications, designs, access codes, billing and related information;
- Procedures, programs and technical information unique to or developed by Keltech and/or the Company; and
- Know-how, trade secrets, intellectual property, reports, plans, proposals and other similar information.

Employees shall not, either during or after their employment with the Company:

- Indirectly or directly disclose, reveal, share or remove Company property to any person, corporation or entity whatsoever, except in connection with an employee's job assignment, and only to the extent authorised by his / her Manager or required by the law;

- Use such confidential information for personal gain or to the detriment, or likely detriment, of the Company; or
- Discuss any issue pertaining to Company business or operations with any section of the media, unless authorised to do so in writing by the General Manager.

8. Privacy

Personal information is information or an opinion about an individual whose identity is apparent or can be ascertained from the information or opinion. Company records include personal information.

During the course of its activities, the Company may collect, hold or use personal information about suppliers of goods and services, customers, contractors and prospective and current employees.

Such personal information should be managed in a professional and ethical manner, according to the Company's principles of Professionalism and Business Ethics. This information is not to be used for any other purpose other than for that for which it was legally collected by the Company. This information must not be disclosed outside of the Company without the written permission of the individual concerned, unless required by law.

9. Consequences of Breaching Confidentiality and Privacy Clauses

Violation of this provision may lead to disciplinary action, termination of employment and/or legal action. By law, this obligation of confidentiality will remain in full force and effect despite the termination of the employment. However, this undertaking does not apply to any information which is or comes into the public domain (other than through unauthorised disclosure by the employee).

6.9 Outside Employment

Employees may not receive payment for employment, services or activities from any competitor, customer, client, supplier or anyone associated with the Company, as determined by the General Manager, without express written approval from the General Manager.

Any outside employment or activity that has been authorised in writing by the General Manager, must be undertaken outside of the employee's ordinary hours of work and must not in any way impinge on the employee's work commitments, unless otherwise approved in writing by the General Manager.

Such employment or activity must not represent an actual or potential conflict of interest or the perception of a conflict of interest.

BUSINESS ETHICS AND CODE OF CONDUCT COMPLIANCE

Any breach of the Business Ethics / Code of Conduct Policy may be treated as serious misconduct and may result in termination of employment.