



Invigor Group Limited

(ACN 081 368 374)

Code of Conduct

Purpose

This Code of Conduct sets out some of the moral and ethical standards expected of the Board and employees of Invigor Group Limited ("the Company"). It is important for all employees of the Company to maintain high moral and ethical standards.

This Code of Conduct is not intended to be exhaustive and cannot anticipate every situation which may morally or ethically compromise a director or employee. In this regard the Company expects directors and employees to use their common sense and sound judgement.

The Board is committed to ensuring that the Company's actions are consistent with the principles of this Code. It will make decisions with this Code in mind and will review the Code from time to time so that it remains relevant and complete. It is intended that the Code will form part of the company's governance policies and should be read in conjunction with the other company policies.

If a director or staff member is in any doubt as to how to act in any situation, please speak with your manager and seek advice prior to taking any action. All requests for advice will be dealt with confidentially.

Guidelines

In performing their duties, directors and staff members must conduct themselves in accordance with the following common-sense principles:

1. You must act honestly and fairly in all business transactions and dealings with others.
2. You must treat other employees, contractors, clients, competitors, and all other persons with whom you deal at work with the utmost courtesy and respect.
3. You must not compromise their duty to act within the best interests of the Company.
4. You must comply with all laws and regulations applicable to the business of the Company.

Professional Conduct

Conflicts of Interest

All employees have an obligation to avoid financial, business or other relationships which might conflict with the legitimate business interests of the Company or the proper performance of their duties.

Such a conflict will exist where you compromise your ability to act with total objectivity with regard to the Company's business interests.

All potential or actual conflicts of interests must be disclosed in writing to the Board of Directors. The Company reserves its right to either approve the conflict upon conditions, or to exclude the employee from the conflict situation.

Equal Employment Opportunity

Discrimination and sexual harassment in the workplace are illegal. Employees should adhere to a policy of equal employment opportunity regardless of gender, age, sexual orientation, race or physical ability.

Confidentiality

Employees should treat all the affairs of the Company, its counterparties and fellow employees with absolute secrecy, except as required by law. This obligation continues should you leave employment with the Company.

Honesty

Staff should be absolutely honest in all their professional activities. Stealing, borrowing, misappropriating money or property for private use, unauthorised access to information and fraudulent acts generally are criminal offences.

You should report any knowledge of fraud, error, breach of law or concealed practice which may be detrimental to the interests of the Company.

Media Comment

Staff members may not make statements or comments to the media or other external bodies regarding the Company, its business dealings, financial status, or its customers unless directed or authorised by the Chairman or Chief Executive Officer. You must direct all media enquiries to the Chief Executive Officer for approval.

Return of Company Property

On termination of employment for any reason whatsoever, all Company property must be returned immediately.

Staff Trading

All employees have an obligation to restrict their dealings in financial products during certain times, or when they are in possession of certain types of information. Please refer to the Share Trading Policy.

Misuse of Company Property, Information & Resources

General Misuse

Generally, the use of the property, information, and resources of the Company for any purposes other than the business of the Company is prohibited.

Authority to Sign documents

Employees cannot sign any documents on behalf of the Company or in any way commit the Company to any agreement unless they have been properly authorised in writing by the Company to do so.

Intellectual Property

One of the Company's most important assets is its intellectual property, including its software, copyrights, patents, trademarks, trade secrets, and training manuals. Each employee is responsible

for protecting the Company's intellectual property rights by complying with the policies and procedures for the protection of these rights.

Whilst employed by the Company (or a related party), all intellectual property that is related to the affairs of the Company including patents, copyrights, inventions, programs and documentation generated by you will become the property of the Company (or the related party).

Outside Employment and Appointments

Subject to the approval of the Chief Executive Officer, employees may obtain supplementary employment or occupations outside the Company, or hold honorary positions in clubs and charitable and community organisations, providing the performance of their Company duties is not affected adversely, such employment or occupation does not in any way reflect adversely on the Company and does not conflict with their duties to the Company.

Any outside directorship of a commercial organisation should be disclosed to the Company and should only be held where there is no possibility of conflict or adverse effect on duties to the Company.

Staff members must notify the Company in advance if they wish to stand for any political office.

Personal Standards and Finances

Staff should adopt personal standards consistent with the high reputation of the Company and endeavour at all times to enhance the standing of the Company.

If a staff member is experiencing financial difficulties, they should never hesitate to discuss them with their Manager. They should inform the Company if any bankruptcy or insolvency action is taken against them.

Whilst at work, staff should dress professionally and appropriately for the specific activities to be undertaken. Subject to this standard being maintained staff can wear casual clothing at their discretion.

Compliance

Adhering to the standards of conduct discussed in this policy is one of the conditions of employment with the Company. Failure to comply with them may result in a staff member being subject to disciplinary action. In extreme cases the staff member may be dismissed.