



7. Employee Code of Conduct

1. INTRODUCTION

The employee code of conduct is a framework of guiding principles for employees of Pantoro Limited (“Pantoro” or “the Company”) to ensure compliance with all legal and ethical standards in work related matters. The code specifies the standards of behaviour for employees in the performance of their duties.

The following principles embody the Code:

- To act with integrity and professionalism in the performance of their duties and be scrupulous in the proper use of Pantoro information, funds, equipment and facilities.
- To exercise fairness, equity, proper courtesy, consideration and sensitivity in all their dealing in the course of carrying out their duties; and
- To avoid real, apparent or perceived conflict of interests.

Employees need to understand that the Employee Code of Conduct also applies to and embraces adherence of the formal policies and procedures of the Company in the conduct of their roles.

2. DEFINITIONS

For the purposes of this document the following definitions apply:

- "Pantoro" means any of Pantoro Limited and its subsidiary group of companies.
- The term "Company" can be interchanged with Pantoro Limited.
- "Employees" means all employees of Pantoro whether or not in a full time, part time, temporary or permanent capacity.

3. RESPONSIBILITIES

- To comply with all lawful directions of the Company.
- To promote the interests of the Company.
- To act in accordance with the Company’s approved policies and procedures (as amended from time to time).
- To observe the Company required standards of performance and behaviour. Where there are concerns about the standard of work performance or behaviour, the Company Discipline and Counselling Policy will be used to address and resolve these issues.



4. CONFLICT OF INTEREST

To devote full attention to Company duties and not undertake any paid or unpaid activity, which is damaging to the interests of the Company. It is the employee's responsibility to raise any potential conflicts of interest with their Manager who will advise if the activities are regarded as in conflict with the Company interests. Involvement in social, sporting, community, welfare, religious, artistic and political activities would not normally conflict with Company interests.

5. COMPUTER AND INTERNET USE

Recognise the Company uses computer software under licence, which may not be reproduced or copied in any way. Employees may only use software in accordance with applicable licence arrangements and not to misuse software or related documentation including making, acquiring or using unauthorised copies of any computer software.

To use Company computers only for purposes approved by the Company. Employees may not undertake any private work on equipment that is the property of the Company.

6. COMPANY PROPERTY

Employees shall not remove any Company vehicles, tools, plant, equipment records, documents or computer files from Company premises or make copies, without the prior approval of the relevant manager of the Company.

7. USE OF INFORMATION

Accept that in the course of employment, employees will not deal with the media (of whatever kind). Employees are not authorised to give any details about the Company or its operations, or purport to represent the Company, unless specifically authorised to do so by the CEO.

8. EQUAL OPPORTUNITY AND HARASSMENT

Agree to support and contribute to the success of the Company Equal Employment and Workplace Behaviour policies.

9. ENVIRONMENT

To comply with environmental laws and regulations relevant to the Company activities.

10. CONFIDENTIALITY OF INFORMATION, DOCUMENTATION AND INVENTIONS

During employment with the Company, employees may be shown or may create information that is confidential in its nature. Employees acknowledge that the Company is entitled to the exclusive benefit of that confidential information. Confidential information created by employees may be able to be made the subject of registered protection, such as a patent in which event employees will fully co-operate with the Company becoming the registered owner of the information.

If the information is not capable of registered protection, employees will fully disclose it to the Company and not disclose it to any other person or use it for any other purpose than employment with the Company both during and after the termination of employment with the Company. Upon request by the Company, employees will enter into a Confidentiality Agreement with the Company.