# **EnviroMission Limited**

# **Code of Conduct**

EnviroMission is committed to full adherence to all laws which apply in each country of operation. In addition, as an Australian listed company, EnviroMission Limited meets the ethical standards and reporting requirements of the Australian Stock Exchange (ASX), regardless of the country of operation.

EnviroMission acknowledges its business conduct could directly or indirectly impact on shareholder value or opportunity and is aware of its duty to shareholders as prescribed in law and anticipated within, but not limited to, the following EnviroMission Code of Conduct:

# EnviroMission Limited is trustworthy in its dealings with regulatory authorities

EnviroMission's board of directors requires senior executives to ensure that all regulatory requirements are fulfilled accurately and on time.

# EnviroMission Limited provides timely information to the market

EnviroMission's board of directors requires the company secretary to release (disclose) information to the market where that information could have a material effect on the EnviroMission share price. All directors, executives and consultants are required to comply with the ASX rules of continuous disclosure and act in the spirit of those rules at all times.

#### EnviroMission Limited values its shareholders

EnviroMission values its shareholders and will provide timely and fully disclosed information to shareholders via company announcements to the ASX and timely publication of company announcements on the EnviroMission website (<a href="www.enviromission.com.au">www.enviromission.com.au</a>). Shareholders may also register (free of charge) via the EnviroMission website, to receive personal email alerts when company announcements or media releases are made.

Shareholders are welcome to communicate with EnviroMission's executive management within the boundaries of what is legal and reasonable ie communication that is; not offensive; not abusive or threatening; does not seek off-market information; and is not persistent to the point of harassment.

EnviroMission will not provide any shareholder with any new information that has not already been released to the market for the benefit or information of all shareholders. Shareholders can be assured that all shareholders are considered equal regardless of the size of individual holdings.

Shareholder meetings will be scheduled, wherever possible, with fair access in mind, for example, not on New Years Eve.

Shareholders will always be encouraged to seek independent financial advice whenever any clarification of a company announcement has been sought, on the basis any clarification might affect a shareholder's investment decision - EnviroMission is not a licensed financial advisor.

EnviroMission adheres to all privacy laws where those laws can be applied to EnviroMission shareholders and their details where/if they are held by or required to be used by the company.

#### EnviroMission Limited is an equal opportunity employer.

EnviroMission Limited does not discriminate on the basis of race, faith, gender, age or physical ability when selecting, training or promoting directors or staff.

# EnviroMission Limited does not condone insider trading by its board, staff or consultants.

All directors, staff and consultants are aware of and must comply with the ASX insider trading rules.

Awareness of any breach of the ASX insider trading rules by any director, staff or consultant will be immediately directed to the Australian Securities Investment Commission (ASIC) for independent investigation.

EnviroMission has an over arching policy that will not tolerate board members, executive management, staff, or consultants, including service providers, that could, in the course of doing business, be privy to information not yet released to the market, from receiving any benefit or advantage from that information prior to its release.

EnviroMission requires service providers to adhere to the same principals regarding the management of the privacy of its shareholders; for example, mail house companies are required to sign confidentiality agreements and terms that prevents any disclosure of EnviroMission shareholders' details to any other third party for any reason, except where it might be required to do so by law.

#### EnviroMission Limited requires care with confidential information

There are two aspects to keeping information confidential.

First, intentionally recognised privacy legislation restricts the way in which employee and customer data may be used. It remains confidential to EnviroMission Limited and can only be passed to outside parties who are employed to process customer accounts (and who must sign confidentiality agreements), mailings or to some regulatory agencies. Senior executives are responsible for the maintenance of confidentiality of staff and customer data under their control.

EnviroMission requires service providers to adhere to the same principals regarding the management of the privacy of its shareholders, for example, mail house companies are required to sign confidentiality agreements to prevent any disclosure of EnviroMission shareholders' details to any other third party for any reason, except where they may be required to do so by law.

Second, there is confidentiality as it relates to EnviroMission Limited's own plans, processes and programmes. All directors, staff and consultants that have knowledge which would benefit a single shareholder (or class of shareholders) at the expense of the wider investing community are required to keep such knowledge confidential. EnviroMission's proprietary software is a valuable asset and relevant senior executives are responsible for ensuring appropriate back-up and security is maintained.

## EnviroMission Limited deals fairly with suppliers of goods and services

EnviroMission Limited does not contract with or otherwise engage parties or persons where it considers integrity might be compromised. Any potential conflicts of interest by any director, employee or consultant is to be declared and any associated party will refrain from taking any part in the engagement decision making process.

## EnviroMission Limited policy toward dealing with inducements and business courtesies

EnviroMission's ethical conduct code requires directors, staff and consultants to act honestly and ethically in all company related dealings; adhering to the principal 'is this the right thing to do?'.

Limits have been established for the acceptance of gifts and/or entertainment, and similarly on the provision of goods, services and facilities by EnviroMission.

The acceptance of gifts and/or hospitality is guided by the principal of what is 'reasonable'. Any/all gifts must be declared to the company for reasons of transparency and review. Directors, staff and consultants are permitted to accept meals and invitations to corporate events where business is discussed or promoted in the course of that event. Acceptance of cash is forbidden. All directors, staff and consultants are informed of this code of conduct and are required to acknowledge their understanding and ongoing compliance.