



Corporate Principles of Conduct

1. Introduction from Chairman

Our aim is to provide shareholders with attractive returns through capital growth in the portfolio over the medium to long term together with the generation of dividend income.

Trust is of the highest importance to the Company. Shareholders place their trust in the Company by investing in us. In all our actions, we must ensure that this trust is always respected.

These Principles outline ethical standards to be followed by all of us when carrying out our responsibilities with a view to the Company achieving its aims.

Bruce Teele
Chairman
July 2011

2. Scope and Application

These Principles of Conduct (Principles) apply to Key Management Personnel (KMP), being Non-Executive Directors and Senior Executives of the Company whenever they are acting in their capacity as KMP of the Company.

The Company has entered into an agreement with Australian Investment Company Services Limited (AICS) to provide a comprehensive range of management, finance, marketing/business development and securities/stock market services to the Company.

AICS will maintain robust Principles of Conduct covering the entirety of its operations that are applicable to all employees of AICS, including those that have been appointed as Senior Executives of the Company.

3. Values

The Company and KMP will:

- conduct business in good faith in the best interests of the Company with efficiency, honesty and fairness;
- perform their duties with the utmost integrity and the standard of care and diligence expected of an organisation of the highest calibre;
- treat others with dignity and respect; and
- not engage in conduct likely to have an adverse effect on the reputation of the Company.

4. Compliance

KMP, as officers of the Company, are subject to extensive legal and regulatory responsibilities. KMP are expected to comply with all relevant laws and regulations applicable to them.

5. Conflicts of Interest

Wherever possible, KMP should avoid conflicts of interest or else must disclose and manage them appropriately.

KMP must disclose to the Board (via the Company Secretary) any material personal interest that they or any closely related party may have in a matter that relates to the affairs of the Company. Where such a conflict of interest arises, appropriate arrangements will be followed so that interested persons are not included in making the relevant decisions.



Any additional office to be held by a Director should be discussed with the Chairman in advance and any change in offices should be disclosed to the Board (via the Company Secretary).

6. No Misuse of Position or Information

KMP must not improperly use their position or use information acquired from their position to gain advantage for themselves or for someone else or to cause detriment to the Company.

7. Confidentiality

KMP must not disclose any confidential information relating to the Company to any other person without proper authorisation from the Board unless the disclosure is required by law, other regulatory obligations, to meet contractual commitments or is otherwise required in connection with the Company's business or authorised under any Company policy.

8. Privacy and Personal Information

KMP must deal with all personal information in accordance with the Company's Privacy Policy and in compliance with applicable laws.

9. Gifts / Entertainment

The Company's operations are such that provision of gifts or entertainment to third parties takes place only on a limited basis and must always be of an appropriate size and nature.

The Company's policy is that KMP should not accept gifts or entertainment in their capacity as a KMP of an inappropriate size or nature. In any doubt, they should consult the Chairman, Managing Director or Company Secretary. In accepting gifts or entertainment, there must be no actual or perceived conflict of interest or ability to influence decision making.

10. Reporting, Compliance & Review

Compliance with these Principles of Conduct is a condition of employment with AICS for each Senior Executive of the Company and a condition of their appointment as a Senior Executive of the Company. Breaches of these Principles may result in disciplinary action being taken by AICS against the Senior Executive.

KMP may be asked to certify annually that they have complied with these Principles.

Suspected breaches of these Principles should be reported via the Company's Whistleblower Protection policy.

The Company Secretary will be responsible for the administration of these Principles, including providing any necessary or requested training to KMP, reviewing them and answering any questions on their application.

These Principles should be read in conjunction with other Company policies, including, but not limited to the Continuous Disclosure policy, Securities Dealing policy, Whistleblower Protection policy and Privacy policy.

Date of Approval: July 2011