

EMPLOYEE CODE OF CONDUCT

1. Introduction

This Employee Code of Conduct (“Code of Conduct”) applies to all employees of Hostech Limited (“Hostech”) and its subsidiaries (“the Company”). It also applies to consultants or contractors engaged to perform work for or on behalf of the Company.

The Code of Conduct sets out specific standards of behaviour that reflect the Company’s ethical principles and provides a guide to assist employees in resolving ethical issues faced in their day-to-day work activities.

While there is no one set of rules capable of providing answers to all ethical questions that may arise, this Code of Conduct provides the framework for appropriate conduct in a variety of contexts. The Code of Conduct is intended to supplement employees’ own common sense and the Company’s other various policies and procedures. The Company’s encourages you to consider the public interest and the Company’s values underpinning the Code of Conduct when applying it to particular circumstances.

Appropriate sanctions for breaches of matters dealt with in the Code of Conduct are contained within this document.

Any clarification on the content of this policy is to be sought from your Manager.

2. References

This document may contain references to the following:

- Employment Relations Act (Cth)
- Industrial Relations Act 1996 (Cth)
- Workplace Safety and Health Act
- Hostech EEO & AA Policy
- Hostech HR Privacy Policy
- Anti-Discrimination Act 1977 (Cth)
- Hostech Employment Agreement
- Hostech Key Policies

3. Personal Responsibilities

Employees are to act in accordance with the Code of Conduct and the decisions of Management in an impartial manner. In particular, employees must comply with all local, state and federal laws, by-laws, statutes, and regulations.

Employees are responsible for keeping the Company’informed of their personal details. Employees must inform the Company of any changes in personal circumstances in regard to a change of name, address, emergency contact details/next of kin and any health conditions, illnesses, allergies or injuries. Each Employee is responsible for what they do at work and will be held accountable for what they do in their job or what they fail to do.

It is each Employee's responsibility to notify their Manager of any foreseen absences from work so that areas can be staffed adequately to meet client needs.

4. Personal And Professional Behaviour

As an employee of the Company you are an ambassador and a representative of the business and, as such, your conduct impacts on the Company's reputation. It is vital that the conduct of each employee is, at all times, to the highest standard. This includes a commitment to satisfy high standards of honesty and fairness at all times. All employees should adhere to the fundamental ethical practices and principles of Hostech's business.

Employment with Hostech requires standards of personal and professional behaviour that promote and maintain public confidence and trust in the products and services of the business.

In the performance of their work duties, employees should strive to:

- perform any duties associated with their position impartially and conscientiously, to the best of their ability;
- keep up to date with advances, trends and changes in their area of expertise;
- be aware of and comply with any relevant legislation, industrial, business or administrative requirements;
- maintain adequate documentation to support any decisions made;
- be aware of the range of functions in order to provide all necessary and appropriate assistance to vendors and clients;
- strive to obtain value for money spent and avoid waste and extravagance in the use of resources;
- not take or seek to take improper advantage of any official information gained in the course of employment;
- understand and apply key employment policies and principles;
- have respect for the personal and professional ethics of other staff across the business;
- provide impartial and accurate advice to the management of the day;
- obey any lawful instruction given by a Manager empowered to give such instruction; and
- act ethically in all dealings both internally and externally.

Employees' own values should not take precedence over those explicit or implicit in the Company's policies. When faced with having to implement an instruction or policy which differs from your personal view, you are encouraged to discuss it with your Manager to attempt to resolve the issue. (See section 7 for a more detailed discussion of this issue.)

4.1 Personal Presentation

Employees must at all times project a professional image by complying with any reasonable instructions of Management or their representatives as to appearance and dress. Attire should be of a standard consistent with a professional in a professional environment.

4.2 Respect for People

Employees are to treat clients, vendors and their colleagues fairly and consistently, in a non-discriminatory manner with proper regard for their rights and obligations. In this regard, they should perform their duties in a professional and responsible manner.

They must also ensure that their decisions and actions are reasonable, fair and appropriate to the circumstances, based on a consideration of all the relevant facts, and supported by adequate documentation.

All employees must have respect and consideration for the property and belongings of the Company and others, be they colleagues or the general public.

Employees must not intentionally or wilfully damage, tamper with, remove, or steal property or belongings which are not their own.

4.3 Dealing with Others

The Company's Anti-Discrimination policy prohibits discrimination, including harassment and bullying, on the grounds of:

- gender;
- marital status;
- pregnancy;
- age;
- race;
- colour;
- nationality;
- ethnic or national origin;
- physical or intellectual impairment;
- sexual preference; or
- religious or political conviction.

When dealing with clients, vendors, colleagues and members of the public at work (or outside work when representing the business), employee behaviour is expected to be in accordance with this Policy and with the principles of Equal Employment Opportunity (EEO) and other key employment policies.

If an employee believes that they are a victim of discrimination, or they have witnessed discrimination by another employee of Hostech, the first employee has a duty to report the matter to their Manager.

Managers have a duty of care to ensure that the workplace is free from all forms of harassment and unlawful discrimination by implementing strategies for preventing and dealing with such matters. Managers must ensure that the employees they supervise are informed of anti-discrimination and EEO principles and are aware of the relevant Hostech procedures for reporting breaches of Policy.

4.4 Innovation

Employees should focus on maintaining economy and efficiency by keeping up to date with trends, advances and changes in their area of expertise, and looking for ways to improve performance to achieve high standards of achievement, outcomes and business operations.

5. Integrity & Business Interest

Employees must use their authority, available resources and information only for the work-related purpose intended.

Employees must not engage in activities, at work or outside work, which could bring Hostech into disrepute.

Legal action may be taken against any person unlawfully accessing and/or removing information that is the property of the Company.

5.1 Protecting Company Information

Employees should exercise caution and considered judgment when disclosing Company information. Unauthorised disclosures may cause harm to individuals or give an individual or an organisation an improper advantage. The integrity and credibility of the Company may also be damaged if it appears unable to keep its information secure.

Confidentiality must be strictly observed and Company information must not be disclosed unless it is appropriate to do so in the normal course of the employee's duties.

Company information comes in a number of forms, it may be written, stored on a computer or computer disk, data base, CRM or might be something that was overheard or said at work.

As an employee of the Company, you can disclose Company information:

- which is normally given to members of the public seeking that information, for example, information published by Hostech in its brochures and marketing publications;
- to those who require access to that information in order to conduct their duties; or
- to those who can demonstrate a need to know.

It is generally not in the public interest to disclose information that is in draft form or is in the course of preparation or where a decision has not been taken or announced.

In case of records that contain the personal information of an individual, this information should not be disclosed to a person, organisation or other company unless:

- the individual concerned has consented in writing to the disclosure;

- there may be reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person; or
- required by law

While in employee care, records that contain personal information should be protected against loss, unauthorised access, misuse, modification or disclosure.

Confidential or sensitive Company information acquired in the course of employment can only be disclosed:

- when proper authority has been given;
- when required to, or authorised to do so by law; or
- when called to give evidence in court.

In these cases, comments made should be confined to factual information and should not express opinion on official policy or practice unless required to do so by the circumstances of the particular situation (e.g. asked to do so in court).

Employees should not use information acquired in the course of their official duties:

- to gain some advantage for themselves or for any other person or group, whether monetary or not. This includes writing articles/blogs for any publication about the intellectual property of the Company, which could be treated as outside employment and is subject to the conditions outlined in the confidentiality requirements which form part of the employment documentation;
- in ways that are inconsistent with the obligation to act impartially; or
- to cause harm or detriment to any person, organisation or the Company.

All employees should follow the relevant Company procedures regarding the storage, disclosure and distribution of official and confidential information. If you are unsure of any of these procedures, don't hesitate to seek help from your supervisor or Manager.

5.2 Company Property and Copyright

Employees are to promote confidence in the integrity of business operations and always act in the best interest of the Company, not in their private interest.

It is expected that, as an employee of the Company, you will be:

- efficient and economical in the use and management of Company resources, including your own work time;
- scrupulous in your use of Hostech property and services and not permit their abuse by others; and
- mindful of the use of environmentally-friendly and recycled materials wherever possible.

Intellectual Property created by the Employee during or arising out of the Employee's employment with the Company, whether or not created during normal business hours or using the Company's premises or equipment vests in the Company. All Company property must be returned when an Employee ceases employment with the Company.

6. Acceptable Use Of Computer And Related Systems

The Company's detailed requirements and obligations in relation to the use of Company computers and related IT systems are defined by, but not limited to:

- PC configurations - are standard and must not be changed without consent of the IT Manager or designated person;
- pirate software will not be tolerated on any PC under any circumstance. - this applies to all software and manuals;
- transfers of text and images via email or internet should only be done when essential to business operations; or
- downloading of material that is of an explicit nature and could offend will not be tolerated and will result in immediate termination.

Any violations of this policy, inadvertent or otherwise, must be reported to both the Manager and Senior Management without delay.

7. Conflict Of Interest

Conflicts of interest exist when it is likely that an employee could be influenced, or perceived to be influenced, by a personal interest in carrying out their duty. Conflicts of interest that lead to partial decision-making may constitute corrupt conduct.

The conflict of interest may arise through a direct interest or indirectly, through an intermediary, such as family or friends.

In many cases, the employee will be the only one aware of the potential for conflict. Therefore, it is employee's personal responsibility to avoid any financial, business or other interest or undertaking that could directly or indirectly compromise the impartial performance of their duties. The onus is on the employee to notify their Manager if a potential or actual conflict of interest arises.

Conflicts of interest may also arise as a result of personal values rather than more material interests.

Employees have a responsibility to act in the best interests of the Company and avoid situations and actions that may be, or create the appearance of being, in conflict with the Company's overall objectives and principles. The following are examples of activities that have the potential to cause conflict and should be avoided:

- the acceptance by an employee from any party or supplier of services, either directly or indirectly, of cash payments (other than reimbursements for reasonable out-of-pocket expenses), services, loans (except from banks or other financial institutions) or discounts (except those offered to all employees of the Company);
- employees or their families benefiting from a business transaction that rightfully should be made available to the Company;

- personal transactions, situations or involvement in which employees or their family's personal interests actually conflict or have the appearance of conflicting with those of the the Company;
- employees engaging in other employment or activity that prevents or restricts their performance to their best ability;
- Company information of a confidential nature being used or disclosed without proper authorisation; and
- business actions that have the potential to embarrass or harm a client or another employee of the Company.

Employees must declare any such circumstances so that proper approval to continue those interests or activities, or avoid the conflict, can be given.

If an Employee is in a situation in which they believe that they may have a conflict of interest, it is appropriate to discuss the matter with their Manager.

To resolve any conflicts of interest that occur, or could occur, a range of options is available depending on the significance of the conflict. These options include:

- recording the details of the issue and taking no further action because the potential for conflict is minimal or can be eliminated by effective disclosure or supervision;
- relinquishing the personal interest; or
- ceasing employment with Hostech.

8. Public Comments

Public comment includes public speaking engagements, comments on radio and television, expressing views in letters to the newspapers or in books, journals or notices or where it might be expected that the publication or circulation of the comment will spread to the community at large.

While each employee, as a member of the community, has the right to make public comment and enter into public debate on social and moral issues, there are circumstances in which public comment is inappropriate. These include:

- where the public comment, although made in a private capacity, may appear to be an official comment on behalf of the Company, or
- where the public comment amounts to criticism sufficiently strong or persistent to give rise to the public perception that the employee is not prepared to implement or administer the policies of the Company as they relate to their duties.

To ensure that the Company is seen as having "One Voice", the Company has chosen its CEO as the first point of contact in the event an official spokesperson is required to communicate on behalf of the Company.

Employees may not give public comments on behalf of the Company, or in any way refer to the Company publicly, without the prior permission of the CEO.

Where any form of the media seeks a statement, full details of any inquiry should be immediately referred to the CEO.

There are no exceptions to this policy.

9. Service Orientation

Employees should serve all Company' clients and customers, whether existing or potential, with respect, concern, courtesy and responsiveness. Remember - the principle reason for the Company's existence and the employment of its staff, are the clients.

Company clients have a right to accurate and timely information. The Company's clients should be readily provided with clear, accurate, current and complete information. Such information should be easy to understand and appropriate to their inquiry.

Employees should deal with enquiries, issues or cases consistently, promptly and fairly. This involves dealing with matters in accordance with approved procedures, quickly and without discrimination on any grounds. There is an obligation to treat each issue reasonably and with a view to meeting the principles of procedural fairness. The rules of procedural fairness require that people significantly affected by an employee's decision have a right to put forward their case and for the decision to be made impartially. As a result, each employee should ensure that all relevant facts are taken into consideration and that regard is given to the particular merits of each case before advice is given or a decision made.

If an employee is unable to deal with an inquiry, or the inquirer, or, if they are unsure of any policies or procedures, they should not hesitate to seek help from their Manager.

10. Equal Employment Opportunity

Equal Employment Opportunity (EEO) means that everyone should have fair and equitable access to jobs, employment conditions, training and promotional opportunities. It does not assume that everyone has the same abilities but aims to ensure that everyone has a fair chance to demonstrate their abilities, to use them, improve them and benefit from them.

Each Employee should be aware of the requirements to ensure there is no discrimination in service on the basis of sex, sexual preference, pregnancy, marital status, parental status, nationality, ethnic or racial background, religious or political conviction, criminal record, union membership, physical, mental, intellectual or psychiatric disability or impairment, medical record, or age.

(Note: Discrimination is any practice which makes distinction between individuals or groups, so as to advantage one and/or disadvantage the other).

The aim of this policy is:

- to ensure that the Company has access to the best possible employees available;
- to ensure that all employees reach their full potential;
- to ensure the retention of well-trained and talented employees; and
- to ensure a working environment which is characterised by high morale, good teamwork and high productivity, satisfaction and motivation.

Company will take action to identify and remove any existing discrimination over which it has control/authority.

Employees and clients will be treated fairly and equitably in an environment free of unacceptable behaviour, intimidation and sexual harassment.

Managers and supervisors will treat any complaint of unacceptable behaviour, intimidation, and sexual harassment seriously, promptly and in accordance with legislation.

11. Discrimination And Harassment

Discrimination in employment occurs when a person is unfairly treated at work and prohibits discrimination on the following grounds:

- carer's responsibilities;
- gender (including pregnancy);
- race, colour, ethnic or religious background, descent or nationality marital status;
- disability (including past, present or future physical, intellectual or psychiatric disability, learning disorders or any organism capable of causing a disease - for example HIV);
- homosexuality;
- age;
- transgender (that is, anyone who lives, has lived or wants to live as a member of the opposite gender to their birth).

There are two types of discrimination: Direct Discrimination - is where someone is treated differently or unequally simply because they have a particular attribute; and Indirect Discrimination - is where there is a requirement that is the same for everyone but which has an unequal or disproportionate effect on groups of people with particular attributes relating to such matters as their sex, race etc, where that requirement is unreasonable taking all the circumstances into account.

Harassment is an unwelcome, unsolicited or unreciprocated behaviour of a nature or connotation (whether physical, spoken or written) between people, either individually or in groups. It may comprise a request for sexual favours that occur in the working environment which is considered to affect the working relationships of the persons concerned. Harassment may occur between persons of the opposite sex or the same sex. Sexual harassment does not include mutually agreed or reciprocated behaviour which does not offend the other person. Mutually agreed behaviour becomes harassment when it continues after a request from the other person that it cease.

People who are harassed or discriminated against have a legal right to complain to the Anti-Discrimination Board if they can't solve the problem within the workplace and/or don't trust the workplace to solve it.

Please refer to Hostech's Key Employment Policies. Once these are read, all employees are requested to sign an 'Acknowledgment of Compliance' which will form part of each employee's employment documentation.

12. Workplace Health And Safety

All employees have an obligation to comply with the Workplace Safety and Health Acts and related legislative requirements to ensure a safe workplace, by, for example:

- observing the non-smoking policy;
- observing the Company's drug and alcohol policy;
- reporting potential safety hazards within the office;
- having correct posture and rest breaks when using keyboards; and
- wearing appropriate footwear.

Specifically, the Acts and related legislation require employees to:

- take reasonable care for the health and safety of persons at their place of work and those who may be affected by their acts or omissions at work; and
- cooperate with any requirement imposed in the interests of health, safety and welfare by the employer or any other person who is authorised to do so under the Act.

Please refer to Hostech's Key Employment Policies.

12.1 General Health & Safety in the Workplace

The Company is committed to providing a safe workplace for employees. We have taken all possible precautions and followed all the guidelines as recommended under the appropriate rules, regulations and legislation.

We expect that employees, in turn, accept their responsibility to work safely. This means working intelligently, with common sense and foresight. All employees are expected to follow the set safety standards that apply to our organization, and adhere to all regulations as set out by the Workplace Safety and Health Acts and related legislation.

Any injury to an employee may cause physical suffering as well as loss of income and productivity. It may, additionally, damage the morale of the work group. The following rules are common sense and should be followed by all employees:

- keep working areas clean at all times - this reduces the chance of any injury and also makes the area a more attractive environment to work in;
- do not run in the workplace, particularly in areas of storage;
- do not smoke throughout the building and, when smoking outside, make sure that you leave that area safe and clean;
- have respect for electricity – do not overload any outlet. Never have any electrical wires rolled up (such as extension leads) – they may create heat and cause fire danger; and

- be aware of hot water temperature and especially boiling water from kettles and coffee machines.

Report ANY injury immediately, and process the appropriate report. It's in everybody's interest. If you notice a condition or practice that seems unsafe, you should immediately discuss this with your Manager, or readily correct it yourself if it is personally safe to do so. If you are unsure of your obligations under the Workplace Safety and Health Acts and related legislation, additional information can be obtained from your Manager.

Please refer to Hostech's Key Employment Policies. Once these are read, all employees are requested to sign an 'Acknowledgment of Compliance' which will form part of each employees employment documentation.

12.2 Accidents

It is the responsibility of each employee to ensure their workplace is a safe and healthy working environment, and prevent accidents where possible. It is a policy of the Company to avoid accidents at all costs. Time and effort have been spent to ensure that the workplace is as safe as possible. If an accident should occur it is important that procedures are followed to prevent future incidents.

All accidents are to be recorded in the accident logbook. Incident report forms are available from Management or the First Aid person. Your supervisor will help record all relevant details. This is extremely important as it allows Management to analyse all factors involved to prevent future accidents.

Accident and incident reports must be filled in as soon as possible after the event has occurred and should include the names of witnesses and witness accounts where possible.

12.3 Drugs, Smoking & Drinking Policy

The use of any and all banned substances within the workplace at the Company is strictly prohibited. We enforce a strict drug-free environment at all times. The use of drugs can create unnecessary risks and creates a threat to fellow employees. It is impossible for an employee to carry out the position of their job responsibly and safely whilst under the influence of drugs.

Any employee using illegal drugs can cause serious damage to the Company's reputation and perception in the marketplace. Any use of illegal drugs while at work or acting as a representative of the Company will not be tolerated.

It is therefore strictly prohibited to manufacture, distribute, possess, sell or use a controlled substance at work, or while representing the Company on or off the premises. Any offence may result in immediate dismissal and may lead to possible prosecution.

All the Company's premises are non-smoking environments. Smoking in any form is strictly prohibited on the premises. Smokers will be asked to take any breaks outside the building and away from the entrance. This policy is to protect the health and safety of all employees.

It is the Company's policy that alcohol is not to be consumed on the Company's premises unless you are attending an official function where drinks have been supplied and are being served in a responsible manner. Alcohol may seriously affect an employee's performance and, therefore, it is the Company's policy that no employee consumes alcohol during work hours.

Being in the workplace while under the influence of alcohol may be cause for disciplinary action and, in some cases, termination.

Please refer to Hostech's Key Employment Policies. Once these are read, all employees are requested to sign an 'Acknowledgment of Compliance' which will form part of each employee's employment documentation.

13. Security Procedures

Each employee must ensure that they are familiar with and follow security procedures that are in place. These cover access of visitors to Company premises, safety evacuation procedures such as fire drills and first aid equipment.

Security problems and violations cannot be addressed in a constructive and preventative manner unless management knows or is advised about them. At Hostech we believe security is the responsibility of all employees. Our policy puts great emphasis on the reporting of incidents as they occur or may look to be occurring, and how they can be prevented.

Even where the work environment appears to be a slightly informal atmosphere, it is important that you abide by the following:

- do not leave any doors or windows open or unlocked after hours - they should all be checked prior to departure;
- make sure that all cupboards, filing cabinets and storage areas are kept locked at all times, with only appropriate staff/ employee access;
- when you see anything of a suspicious nature, contact your Manager (who will contact the person in charge of security). Take any details down on paper and supply the relevant report to the Manager.

The above are only samples and your responsibility is not limited to these incidents. Written reports should be prepared immediately after any security-related incidents, and should include information regarding the 'who, what, when, where, why and how' aspects of the incident. If time is critical, please supply these details over the phone and confirm them at a later stage in writing.

13.1 Security Inspections

It may, on occasion, be necessary to conduct security inspections. These will at all times be conducted by a member of Management and authorised by Senior Management or another appropriate member of OH&S team. Security inspections may include your personal belongings and regular office space.

Security checks will not be taken lightly and at no stage will a violation of your privacy occur. At all times the Company will strive to prevent personal dignity being compromised.

No individual employee will be singled out for inspection, unless eye witness statements, evidence or proof of any misconduct may substantiate allegations.

In a case of major misconduct, the Company has the discretion to require attendance of any law enforcement agency or other representation as considered appropriate.

13.2 Access Cards and or Keys

Access cards/Keys will be issued to those employees who require access to the Company's premises.

Lost or stolen cards or keys must be reported to your Manager as soon as the loss is discovered.

14. Ethical Selling

The Company, as a reputable technical provider selling technical products, assumes certain responsibilities toward clients and customers arising out of how contacts are made and conducted. The Company operates under the basic fair and ethical principles and practices that all employees must adhere to in undertaking and conducting their sales representing the Company.

In conducting the sale, the employee must be accurate and truthful as to price, course, value, dates, business value and availability. A client order or request for services shall be fulfilled in a timely manner.

Any employee found guilty of unethical sales practices risks immediate termination of their employment.

15. Matters Taking Precedence Over This Code Of Conduct

If you are subject, by virtue of your position and qualifications, to a professional Code of Ethics or Standard of Conduct, the Professional Code will take precedence where there is any conflict with Hostech's Code of Conduct. You should take steps to make yourself aware of professional Codes that may apply to you.

16. Corrupt Conduct

If an employee has sound reasons to suspect that anyone associated with the Company is behaving unethically or engaging in corrupt or criminal conduct, maladministration or serious and substantial waste of the Company's resources, they have a duty to report the matter.

All reports of suspected corrupt conduct will be investigated and appropriate action taken.

If an employee is unsure of the types of behaviour these terms cover, they should discuss their concerns with their immediate Manager, COO or CEO.

17. In The Event Of An Emergency

Emergencies are never easy to cope with. They are usually at a time of chaos and panic. **Please try to keep CALM and seek instructions from management.**

Depending on how detrimental and urgent the emergency is, an employee should apply one of the following procedures.

17.1 Life Threatening Emergencies

1. notify emergency services e.g. if the building is burning uncontrollably, call the fire brigade as soon as possible;
2. alert all personnel in the building and exit the building immediately (remember to check the toilets);
3. employees need to contact either their Manager or Senior Manager if they are not on the premises and let them know what is happening and what actions you have taken.

17.2 General Emergencies

If the emergency is a power failure, for example, where it is not life threatening, but does impact the business operations, action is required immediately. In that circumstance, you must call your Manager, and await their instructions.

17.3 EMERGENCY NUMBERS

POLICE	000
AMBULANCE	000
FIRE BRIGADE	000
CEO	0412877460