

CODE OF CONDUCT

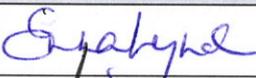


VERSION CONTROL

Document properties

Version	Date	Author	Comments
V 1.0	20 May 2014	Naomi Feast	Initial development
V 1.1	17 June 2014	Naomi Feast	Initial development – draft 2
V 1.2	1 July 2014	Naomi Feast	Final
V 1.3	17 November 2014	Amanda Evans	Revision and Update
V 1.4	16 December 2014	Amanda Evans	Final
V 2.0	21 July 2017	Alissa Riedel	Inclusion of new conflict of interest policy
V 3.0	February 2018	Emma Lynch / Mark Perkins	Inclusion of whistleblower policy, children at work & minor revisions
V 4.0	August 2018	Sally McDow	Removal of HR policies from Code of Conduct, inclusion of principles

Approvers / Sign Off

Person	Title / Ownership	Sign Off	Date
Emma Lynch	Group Legal Counsel		14/8/2018
Domenic Capomolla	Managing Director		9.8.18

DOCUMENT ACCEPTANCE AND RELEASE NOTICE

This is version 4.0 of the Blue NRG Code of Conduct.

INTRODUCTION

This Code describes the standards of conduct expected of our people including employees, directors and contractors. It provides a set of values and guiding principles to help us make the right decision every time.

Blue NRG's Values are:

- Have Customer Focus
- Foster Team Environment
- Be Transparent
- Think Innovatively
- Shared Knowledge

Blue NRG's Principles are:

1. We act with honesty, integrity, and due skill, care and diligence
2. We comply with laws and our policies
3. We do the right thing by our customers
4. We respect confidentiality and do not misuse information
5. We value and maintain our professionalism
6. We work as a team
7. We manage conflicts of interest responsibly.

We all have a role to play in ensuring that the reputation of Blue NRG is strengthened and not harmed by our conduct, whatever work we do.

The Code has the full support of the Blue NRG Board and management and we take compliance with the Code very seriously.

If you breach the Code then you may face disciplinary action, including termination of your employment. You also have a responsibility to report immediately any breaches by a colleague to your Manager or the Company Secretary. Do the same even if you are unsure if there has been a breach. Our Whistleblower Protection Policy outlines reporting channels.

PRINCIPLES

1. We act with honesty, integrity and due skill, care and diligence

We do the right thing because it is the right thing to do. Honesty and integrity guide us in making decisions, so that we make the correct choices between right and wrong.

Acting with due skill, care and diligence requires you to understand and perform your duties competently, professionally and in accordance with our controls, risk management processes and policies including this Code.

We will accept responsibility for our actions. Similarly, we should not put ourselves in a position of conflict with the interests of a customer, nor favour the interests of one customer over another.

2. We comply with laws and our policies

We comply with our legal obligations, regulatory requirements, voluntary codes of practice to which we subscribe and Blue NRG policies including HR policies. If we fail to comply with laws and regulations, both Blue NRG and the individual employee may face criminal sanctions or other serious consequences. If you are unsure what laws and regulations apply, then contact the Compliance Manager or Company Secretary.

We must also comply with Blue NRG's internal policies and procedures, including this Code. If you are unsure what policies and procedures apply to your work, then talk to your Manager.

If there is anything inconsistent between the laws and regulations applying where you work and our policies and procedures, then you need to meet whichever sets the higher standard of behaviour. If you believe such an inconsistency exists, you should talk to your Manager.

3. We do the right thing by our customers

Customers can be confident that doing the right thing by our customers is integral to our culture. We win and maintain that confidence by working together to:

- aim to ensure our products and services are suitable for our customers and we treat our customers fairly;
- provide customers with the information they need to make informed decisions; and
- listen to and act on customer complaints;

4. We respect confidentiality and do not misuse information

You may come across confidential information concerning our customers, suppliers and other third parties when working for Blue NRG. You may also be aware of confidential information or intellectual property of third parties from previous relationships (e.g. former employment). It is vital that you respect your confidentiality obligations to third parties and we respect the trust placed in us by third parties who share their information with us.

You must not use or disclose the confidential information of a third party, unless they have authorised, you to do so and the use or disclosure is permitted by law. Similarly, if you come across confidential information concerning Blue NRG, such as strategic information, then you must not misuse or disclose that information, including sending information to a personal email account. In addition, you must not use the information to obtain a personal benefit or benefits for other people. These obligations continue after you have left Blue NRG.

5. We value and maintain our professionalism

We take responsibility for our professional conduct. The way we conduct ourselves both at work and outside work directly impacts how others perceive us and therefore Blue NRG. As employees, we should at all times act in a professional and ethical manner. Examples of the way we value and maintain our professionalism are:

- acting with honesty and integrity, and doing the right thing when delivering on our commitments;
- behaving appropriately at work or work-related social functions;
- being accountable for our decisions and actions; and
- only using Blue NRG property, including information technology, for proper purposes.

6. We work as a team

We treat each other with respect and kindness, promoting an environment that enables everyone in the team to reach their full potential. We can't achieve our vision of being one of the world's great service companies unless we look after the health, safety and wellbeing of our people.

Blue NRG recognizes the importance of workplace diversity and we value and respect each other's differences. We do not tolerate bullying, harassment, unlawful discrimination or any other offensive conduct. Examples of how we work as a team are:

- supporting each other;
- collaborating with our colleagues to do what is right for our customers; and
- taking responsibility for our working environment by reporting any issues immediately.

7. We manage conflicts of interest responsibly

Potential conflicts of interest can arise every day and, to enable us to recognise and deal with them appropriately, we must stay diligent. The simply stated rule is that we should not participate in activities that involve a conflict of interest between our personal interests and our duties and obligations to Blue NRG, or which a reasonable person would perceive as involving such a conflict of interest. Some examples of how we manage conflicts of interest include:

- immediately reporting dishonest behaviour by our colleagues and customers;
- not soliciting, accepting or offering money, gifts, favours, entertainment or bribes which might influence or be seen to influence your business judgement;
- not accepting gifts except in very limited circumstances;
- not trading in the shares of Blue NRG companies or any other entity if you have obtained information that is not generally available to the market place and is material, and not passing that information on to any other person;

- not processing your own transactions or those of your friends, relatives or business associates;
- keeping records of our dealings with customers and suppliers that are accurate and transparent;
- not participating in business activities outside your employment in Blue NRG if it could adversely affect your ability to carry out your duties and responsibilities to Blue NRG – even if there is no such potential adverse impact, you should seek approval of your Manager before participating in those activities;
- not using funds, property or information belonging to Blue NRG or our customers for our personal benefit, nor helping others to do so;
- disclosing any material interest, you have in a customer's or supplier's business to your People Leader; and
- seeking the consent of senior management before accepting a directorship on the board of a non-Blue NRG Group company.