

CODE OF CONDUCT

Engin has adopted a Code Of Conduct which clarifies the standards of ethical behaviour required of company directors and key executives.

1. Conflicts Of Interest

Directors and key executives must disclose to the company any direct or indirect business interests and any other matters which may result in a conflict between personal interests and that of the company.

2. Corporate Opportunities

Directors and key executives are precluded from taking advantage of property, information or position, or opportunities arising from these, for personal gain or to compete with the company. Employees must not accept any gift, gratuity, discount of service from any person or entity where acceptance of benefit may influence, or appear to influence the conduct of the employee's duties or judgement.

3. Confidentiality & Privacy Of Information

Directors and key executives will ensure that:

- Engin confidential information is not disclosed unless authorized or legally required to do so;
- The company Privacy Policy is adhered to.

4. Fair Dealing

Directors and key executives will act with fairness, honesty and integrity in all dealings made on behalf of the Company with all stakeholders.

5. Protection & Proper Use Of Company Assets

Directors and key executives will protect and ensure the efficient and legitimate use of company assets.

6. Compliance With Laws & Regulations

Directors and key executives will ensure the company complies with all statutory requirements and company policy. This includes compliance with ACCC undertakings and direct marketing legislation.

Policy and procedure manuals are used to ensure compliance with statutory requirements.

7. Whistle Blowing Protection

Directors and key executives must ensure that a framework exists within the organisation which encourages the reporting of any unlawful or unethical behavior by any employee or officer of the Company. Employees are able to do this on an anonymous basis by informing the Chairman, any Director, the Chief Executive Officer, their manager or the Company Secretary of any instance of unlawful or unethical behaviour.