

AUSTRALIAN CHAMBER OF COMMERCE HONG KONG

("AustCham")

CODE OF CONDUCT

AustCham's Code of Conduct ("Code") is the document that translates our commitments to all our stakeholders into a set of formal written requirements. It puts all directors, officers and employees under specific obligations. It reminds us that AustCham is committed to acting with integrity in all its activities.

Respect for People

AustCham values its employees and is committed to providing a fair and equitable workplace for all employees. The Company is also committed to maintaining an environment of respect for people in all business dealings. We have a responsibility to deal with any discriminatory act and/or harassment in the workplace. The Code requires each of us to behave with courtesy and respect towards everyone we encounter during our business. We must respect the privacy of personnel data and employee records, as well as personal and business information we may have concerning others.

Ethics

AustCham is committed to conducting all our business with integrity, in accordance with strong business ethics. Ethics go beyond the narrow letter of the law. Whatever the law may permit, all our business must be conducted honestly and fairly, with no conflict of interest or undue influence. We must also be honest and forthcoming with our colleagues, prepare and offer honest business assessments, evaluations and proposals, and record accurately all transactions. If we make a business commitment, we must take reasonable care to ensure that we meet it. Adherence to our standard business practices is also required under our Code. We are all required to exercise reasonable care to ensure that AustCham meets the terms of its contractual obligations with our members, business partners and associates. Each of us is under an obligation to promptly report ethical concerns and suspected or actual violations of the Code to management.

Avoiding Conflicts of interest

AustCham is committed to conducting its business without conflicts of interest. The Code requires each of us to disclose in writing, and obtain prior authorisation, before engaging in any business, investment or activity that might pose or appear to pose a conflict between our individual interests and those of AustCham. We are expected to avoid participating in any external activities and transactions that could interfere with the performance of our duties and responsibilities, affect our independent and objective judgment, or discredit or divert opportunities away from AustCham without the prior consent of management.

The circumstances in which a conflict of interest might arise are too numerous to list. But certain activities clearly fall into this category: concurrent employment with any organizations other than AustCham; negotiation or transactions by one's self, immediate

family members, other relatives or close personal friends, for business of any kind with the Chamber (other than with respect to one's employment contract). The Code strictly prohibits each of us from providing or making available confidential information to anyone outside the Chamber without proper authorisation from the Chief Executive Officer. It likewise prevents us from using confidential information to obtain benefit or to harm others. The Code places a special obligation on those employees who are involved in evaluation of business proposals and the selection of our suppliers and contractors to avoid situations that could interfere, or appear to interfere, with their ability to make fair decisions. The purchase of supplies, equipment and services should be conducted according to sound business practices. Suppliers should be treated fairly and ethically and the confidentiality of their proprietary information be maintained.

Making Political Contributions

It is AustCham's general policy to remain politically neutral and avoid making political contributions (donations). However, the Company's policy in no way restricts an employee, as an individual, from making political contributions or participating in local or national politics. Such contributions or participation must not create a conflict of interest with the individual's role and duties to AustCham, nor infer in any way that the contribution or participation is endorsed by AustCham or reflective of AustCham's views (see Representation of AustCham below). Such contributions or participation must be declared by an employee or Director of the Board to the Chair in a timely manner.

No Bribery

AustCham is committed to abiding by all laws and regulations or if necessary to exceeding them, to prevent bribery wherever we do business. We interpret the term 'bribe' broadly to include any illicit advantage offered or accepted as an inducement to or reward for performing or abstaining from performing any duties. Items considered bribes include cash, cash equivalents, loans, commissions, benefits in kind or other advantages. Bribery does not include traditional gifts of nominal value given during festive seasons. The Code forbids paying, offering, asking for, proposing terms for, or accepting, bribes directly or with the assistance of any organization or individual. We are strictly prohibited from discussing terms with people who ask for or offer bribes. Any employee who receives an offer of bribery must immediately report it to their manager.

Protecting our Information, Records and Assets

Each of us has a duty to safeguard AustCham assets and resources entrusted to our care - from loss, theft or misuse. Company assets and resources may include but are not limited to physical property, records, member information etc. Use of AustCham assets or resources, other than for AustCham purposes, requires prior authorization and proper justification. All employees should recognize that upholding effective cybersecurity controls to protect AustCham is the responsibility of each of us. We must safeguard at all times the confidentiality of business or other sensitive information and the integrity of our business and operational records. We must also protect from misuse business information or assets held by us on behalf of customers, partners and members. In general, matters not publicised or released to the public domain may be sensitive and we should treat this information with reasonable care and security. The internet and email are provided to employees as tools to carry out their employment duties. All messages created, sent or retrieved using AustCham

internet and email facilities remain the property of AustCham and cannot be considered private. As users, we each have a responsibility to ensure these facilities are used in an ethical and lawful manner in accordance with the relevant laws and AustCham policies and procedures. Failure to abide by such laws or policies and procedures can result in disciplinary action, including termination of employment.

Compliance with Financial Controls and Reporting Requirements AustCham books, invoices, records, accounts, funds and assets must be created and maintained to reflect fairly and accurately and in reasonable detail the underlying transactions and business. This Code explicitly prohibits each of us from making any false/misleading statements or other entries in the books, accounts, records, financial statements, or any other documents. This Code also prohibits each of us from creating, maintaining or using any off-the-record accounts with banks or any other third parties. No reporting may be made that intentionally conceals or disguises the true nature of any transaction. The Code requires everyone to cooperate fully with our external auditors. We have an obligation to provide complete, honest and accurate information to our auditors and to anyone conducting a duly authorized investigation. Each of us is explicitly prohibited from destroying, altering or falsifying any records that may be connected to an investigation, litigation or bankruptcy proceeding.

Representation on Behalf of AustCham Only authorised persons of AustCham are permitted to make representations on behalf of the Chamber. When we need to publish or disseminate information in public forums or websites, we should do so in a manner that safeguards AustCham's public image and reputation. In addition, none of us should publicly endorse or comment on the products, services or equipment of suppliers, customers or competitors unless specifically authorised by the Chief Executive Officer. 'Endorsing' includes any form of promotion or otherwise giving testimony in support of a product, service or piece of equipment.

Compliance with Code AustCham is committed to maintaining full compliance with this Code. Each of us has an obligation to fully comply with its provisions and promptly report ethical concerns and potential or actual violations of the Code, whether or not it is known who may be responsible for the violation or how it may have occurred. Reports should be made to the Chief Executive Officer or the Chair of the Finance, Audit & Risk Committee. Anyone found violating the Code will be subject to disciplinary action which may include dismissal. Anyone initiating or threatening to initiate retaliation against a complainant or informant, will be subject to disciplinary action which may include immediate dismissal.