



# Code of Corporate Conduct

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**Acrow's policy is that our employees must observe both the letter and spirit of the law and adhere to high standards of business conduct and strive for best practice.**

Compliance with high ethical standards is important to Acrow and to the community at large. It will:

- enhance the Company's reputation for fair and responsible trading,
- help to maintain high standards of behaviour throughout the organisation, and
- help to develop pride among staff and to give a focus to the organisation as a whole.

Acrow's managers and employees are encouraged to participate in active discussion about difficult ethical issues and to establish appropriate and consistent responses. They are also encouraged to establish standards of behaviour which, where appropriate, exceed minimum legal requirements. Acrow encourages open communication that allows difficult and sensitive issues to be raised and to be resolved without fear of reprisal. Acrow's managers and employees should acknowledge and constructively address issues that may be damaging to Acrow's reputation.

Acrow has a number of documented policies, guidelines and procedures which set out specific requirements and expectations relating to: legal and ethical practices; health, safety and environment; human resources, communications, marketing and information technology; finance and accounting; and business practices.

Because of the importance of this Code of Corporate Conduct to the Company and its employees, and the potential seriousness of any breach, any employee who breaches this Code or any of the guidelines or policies under it, or authorises or permits any breaches by a subordinate in sufficiently serious circumstances, may be subject to disciplinary action including dismissal.

Maintenance of high standards of corporate conduct is very important to Acrow's credibility and reputation. Employees are encouraged to report any actual or suspected breach of the Code or guidelines to their Supervisor or to the Human Resources Manager. Alternatively, employees may choose to directly contact their General Manager.

Any employee who reports in good faith a breach or suspected breach of legal or ethical standards can do so confidentially and will not be subject to retaliation or suffer any recrimination for making that report.

Steven Boland  
Chief Executive Officer