



## Code of Conduct

ZipTel Ltd ACN 108 042 593 (Company)

### Summary of Code of Conduct

The Board has adopted a Code of Conduct which outlines the Company's commitment to conducting itself with honesty, fairness and integrity and to observing the rule and spirit of the legal and regulatory environment in which the Company operates, and requires Directors, officers and employees to deal with the Company's customers, suppliers, contractors, shareholders, competitors and each other accordingly.

The Code prohibits Directors officers and employees from involving themselves in situations where there is an actual or potential conflict of interest. The Code also addresses the Company's policy on financial and other inducements. Directors, officers and employees must not disclose the Company's confidential or proprietary information. Directors, officers and employees must protect the assets of the Company to ensure availability for legitimate business purposes.

The Company acknowledges its responsibility to shareholders, the community, and the individual. The Company is committed to equal employment opportunity; a safe work place and maintenance of proper occupational health and safety practices commensurate with the nature of the Company's business and activities; and a workplace free from any kind of discrimination, harassment or intimidation of employees.