



CODE OF CONDUCT
EMPLOYEE HANDBOOK

2018

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MESSAGE FROM THE MANAGING DIRECTOR



MaxiTRANS' future relies on the trust of our customers, shareholders, employees and more broadly the communities in which we operate.

Trust is gained through all of us acting and working ethically, with integrity, professionalism and honesty. MaxiTRANS is judged on not only what we do but also how we do it. Our Company Values are of utmost importance to us and should be reflected in our ethics and behaviour.

As our business continues to develop, we welcome new employees and value the knowledge and diversity they bring to help contribute to the success of our business. This success is made all the easier if we share the common principles of good business conduct. By observing and adhering to our ethical standards, we will reinforce the trust and respect of all those who are involved in MaxiTRANS' business activities.

The MaxiTRANS Code of Conduct is more than just a set of standards and practices. It provides the ethical foundation upon which we base our business. Its principles ensure we share a common understanding about doing the right thing and what this entails.

The Code of Conduct also provides clear guidance on how to speak-up if you witness a possible ethical violation. The business commits to protecting anyone who does speak-up, from retribution.

Compliance with the Code of Conduct is everyone's responsibility and I am personally counting on you to make this Code your own, to consult it whenever necessary and to implement its principles into your day-to-day work.

Dean Jenkins
MANAGING DIRECTOR



THE MAXITRANS WAY



Guided by our Core Value to send all our people home safely at the end of the working day, we are committed to:

- Driving and enabling our organisation, through empowering our people, to deliver our strategy in the MaxiTRANS Way
- Leveraging the depth and breadth of the organisation to realise new and innovative growth opportunities

OUR VALUES

- Send all our people home safely
- A balanced focus on customers and results
- Enable and empower people to achieve results
- Be honest, forthright and ethical in our dealings
- Encourage collaboration and deep seated accountability
- Become better every day in all that we do



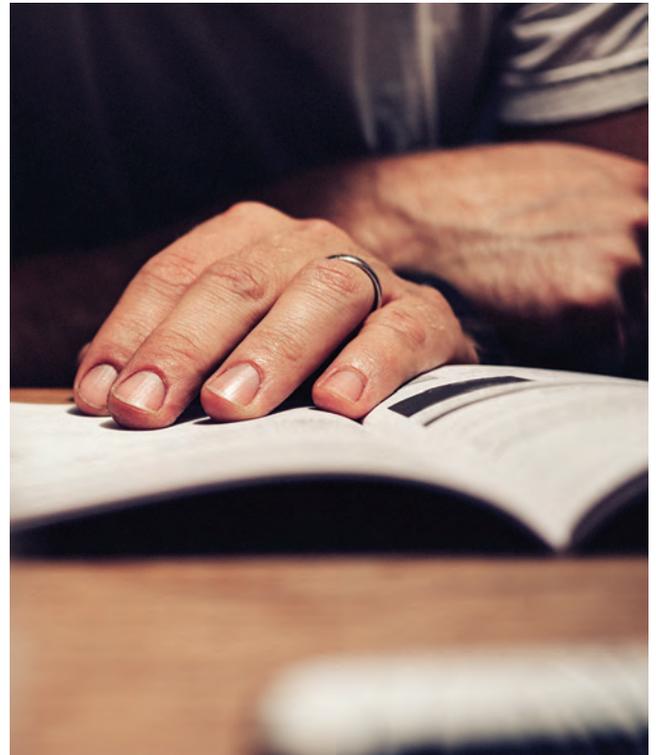
The MaxiTRANS Code of Conduct (the “Code”) is based on our business Values. The Code represents our commitment to uphold ethical business practices and to meet or exceed applicable legal requirements.

We believe that consistent and proper business conduct creates loyalty and trust with our stakeholders and each other.

The Code helps guide our daily work. It demonstrates how to apply the commitments and values set out in our Values and reflects many of the company’s policies and procedures, which are applicable across the MaxiTRANS business.

OUR EXPECTATIONS OF YOU

All employees, directors, managers, contractors and suppliers (where under relevant contractual obligation) must adhere to the Code, regardless of location or role. Make sure you know the rules that apply to you and your work, and always apply them. Where differences exist due to local customs, rules or regulations, the Code or local requirements should be applied – whichever sets the higher standard of behaviour.



ZERO TOLERANCE FOR RETALIATION

MaxiTRANS prohibits any form of punishment, retribution or retaliatory action against anyone for raising or helping to address a business conduct concern. Retaliation is grounds for disciplinary action up to and including dismissal.

If you experience retaliation because you raised a concern, you must report it immediately.

The laws that govern our workplaces and activities are often complex, but ignorance does not relieve you of your obligation to comply with the Code.

If you have any questions, please seek advice from your manager or the Human Resources Department.



USING THE CODE

As a MaxiTRANS employee, you are expected to take time to understand the Code and how it applies to your everyday work. If you are unsure of how to apply the advice provided in the Code, please ask.

Each section in the Code explains why a specified topic is important to our Company, our expectations of you and where you can go for further information or help. The Code provides simple examples of what is acceptable and not acceptable to help you understand how to apply the Code in a practical sense. Regardless of your role, location or the level of decisions you make each day, you will find clear guidance on expected business behaviour within the Code.

OUR EXPECTATIONS OF YOU

When working for MaxiTRANS you agree to uphold our Values, the Code and adhere to the relevant MaxiTRANS policies and procedures that apply to your work. If you are ever in doubt, please ask.

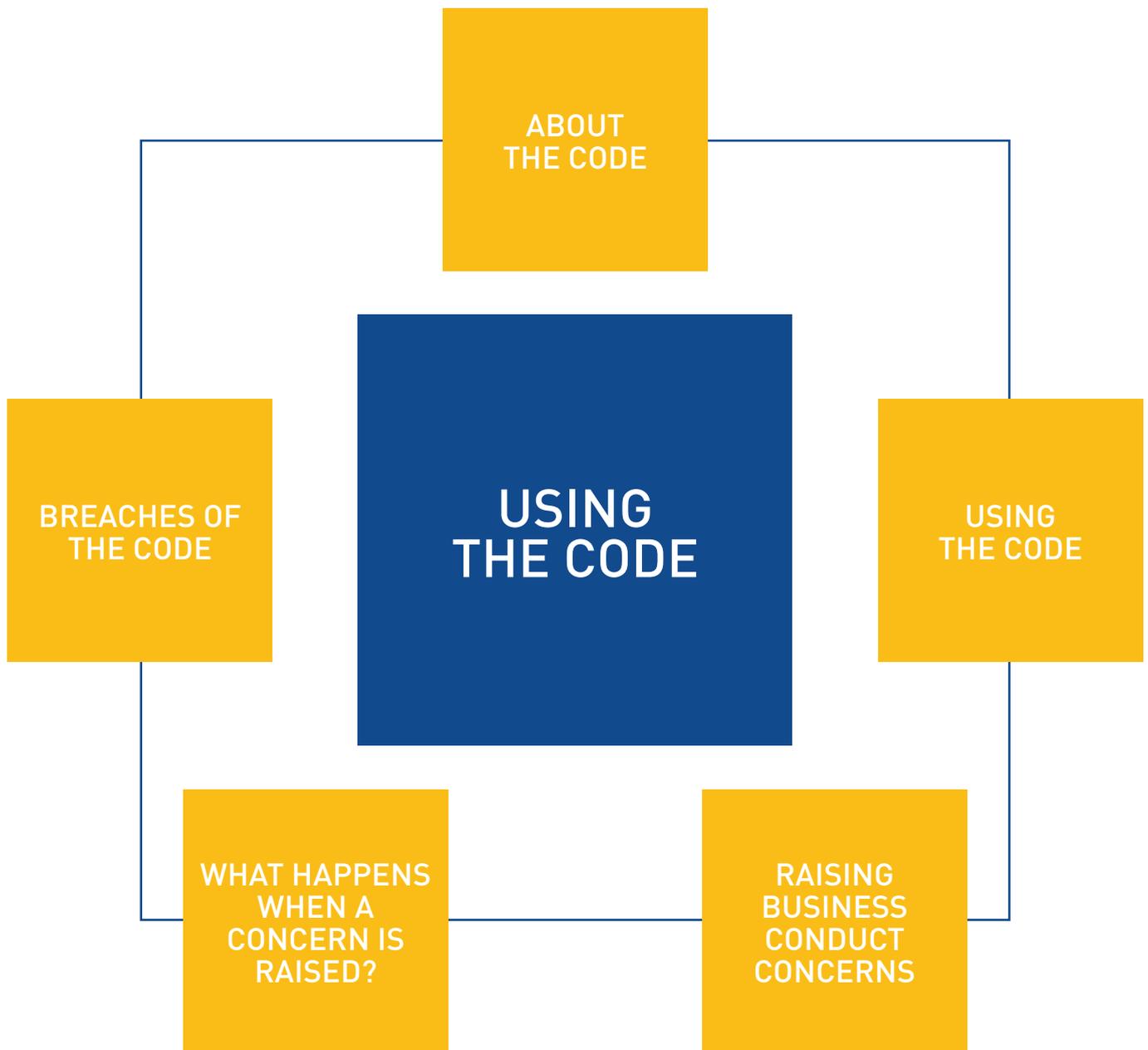
Inappropriate actions may occur because the person does not have the full information, does not understand the information provided or just wants to 'get the job done'. It is critical that you understand the Code and how it applies in the workplace.

You must:

- Take all reasonable steps to ensure others who conduct business on behalf of MaxiTRANS, including contractors, consultants and business partners, uphold our Values, the Code and adhere to the relevant policies and procedures that apply to our business
- Understand and meet all requirements of MaxiTRANS policies and procedures that apply to your work
- Raise all questions and concerns immediately
- Never encourage, allow or personally demonstrate retribution/retaliation towards someone raising a concern
- Never ignore a breach or potential breach of the Code

If you are a supervisor or manager, you have an additional duty of care to understand your responsibilities in dealing with Code of Conduct concerns. Those who supervise others should:

- Consistently demonstrate exemplary behaviour
- Recognise and acknowledge employees for demonstrating behaviours in line with our values
- Foster an inclusive culture where employees understand their responsibilities, feel comfortable and supported to raise concerns without fear of retaliation





RAISING BUSINESS CONDUCT CONCERNS

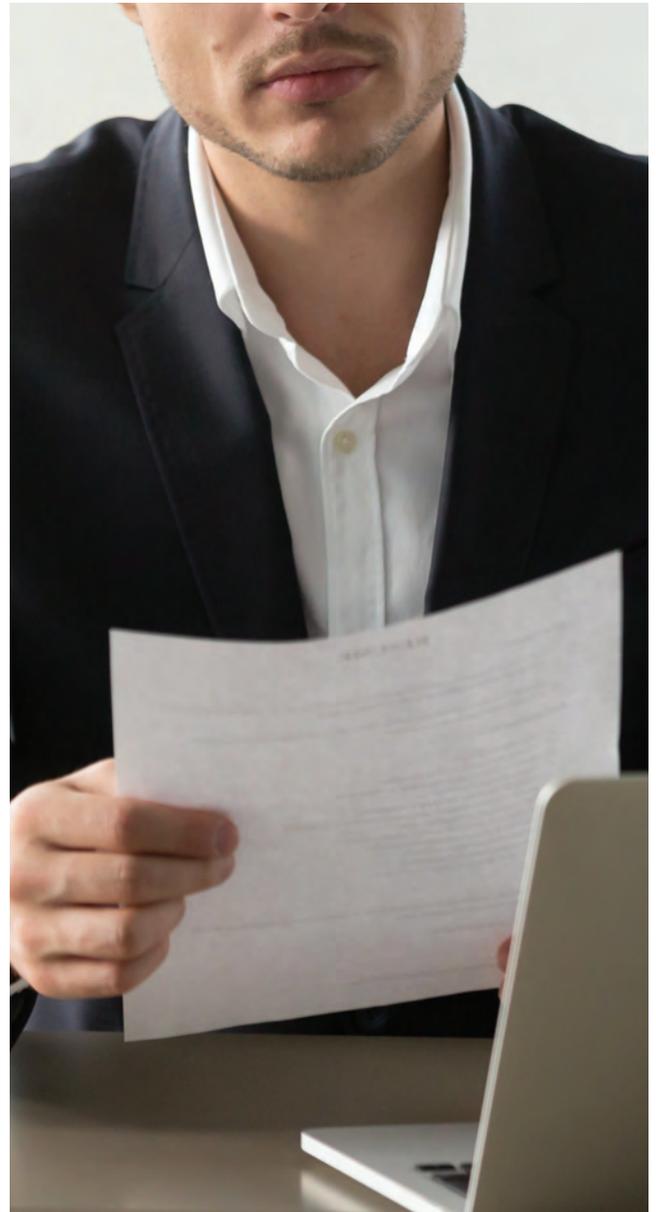
In conjunction with KPMG as an independent third party, MaxiTRANS has a FairCall hotline service where employees in Australia and New Zealand can call toll free to raise concerns about unacceptable, unethical or illegal activities in our workplace. Employees in China can email their concerns to the FairCall Service.

The FairCall hotline service will take your call in total confidence, and you can remain anonymous if you want to.

MaxiTRANS encourages employees to first raise any concerns with their direct line manager or with Human Resources, however MaxiTRANS recognises that people may not always feel comfortable doing this which is why MaxiTRANS have arranged with KPMG as an independent organisation to operate the FairCall hotline service.

Remember in case of a concern please contact either:

- Human Resources or
- **Fair Call:**
Australia | 1800 500 956
New Zealand | 0800 100 526
China | mtc@ethics-hotline.com





WHAT HAPPENS WHEN A BUSINESS CONDUCT CONCERN IS RAISED?

All concerns about breaches of the Code will be taken seriously and will be assessed in a timely manner.

If you raise a concern with your Supervisor, Manager, Human Resources Representative or 'FairCall', the course of action will depend on the nature and severity of the issue.

If you raise a concern through 'FairCall' you will be asked what business you work for, the nature of the issue, who is involved, and what steps you have taken so far to address the issue. Your confidentiality will be respected. In many cases, advice, support and guidance will enable you to resolve the issue yourself. If this is not possible or if it requires referral, mediation or investigation, you will be advised on the next steps in the process and any other related information.

OUR EXPECTATIONS OF YOU

When you raise a concern, please provide as much information as possible. Be as open and honest as you can, as this will assist in a thorough and effective response. You may choose to remain anonymous when raising a concern through 'FairCall'. It is preferred that you provide your name and contact details in case further information, assessment or investigation is required.

Supervisors / Managers who are responding to a concern raised in house are obliged to:

- Treat all concerns seriously, discreetly and confidentially
- Respond to an issue raised in a prompt and professional way
- Provide accurate information and advice consistent with the Code and our policies and procedures, or seek the advice of experts with the right knowledge and objectivity
- Know where to go for further support or advice
- Report all concerns to the Human Resources Department



BREACHES OF THE CODE

Failing to comply with the Code is a serious matter that must be addressed. It may lead to disciplinary action including dismissal, and/or legal action.

MaxiTRANS supervisors and managers are accountable for their own behaviour and for the business conduct behaviour of their employees. If a breach of the Code has occurred, the nature of any disciplinary or corrective action will be determined in consultation with appropriate management and Human Resources. Any corrective action taken will be dependent on the seriousness of the breach of the Code and other relevant circumstances.

Examples of disciplinary action include:

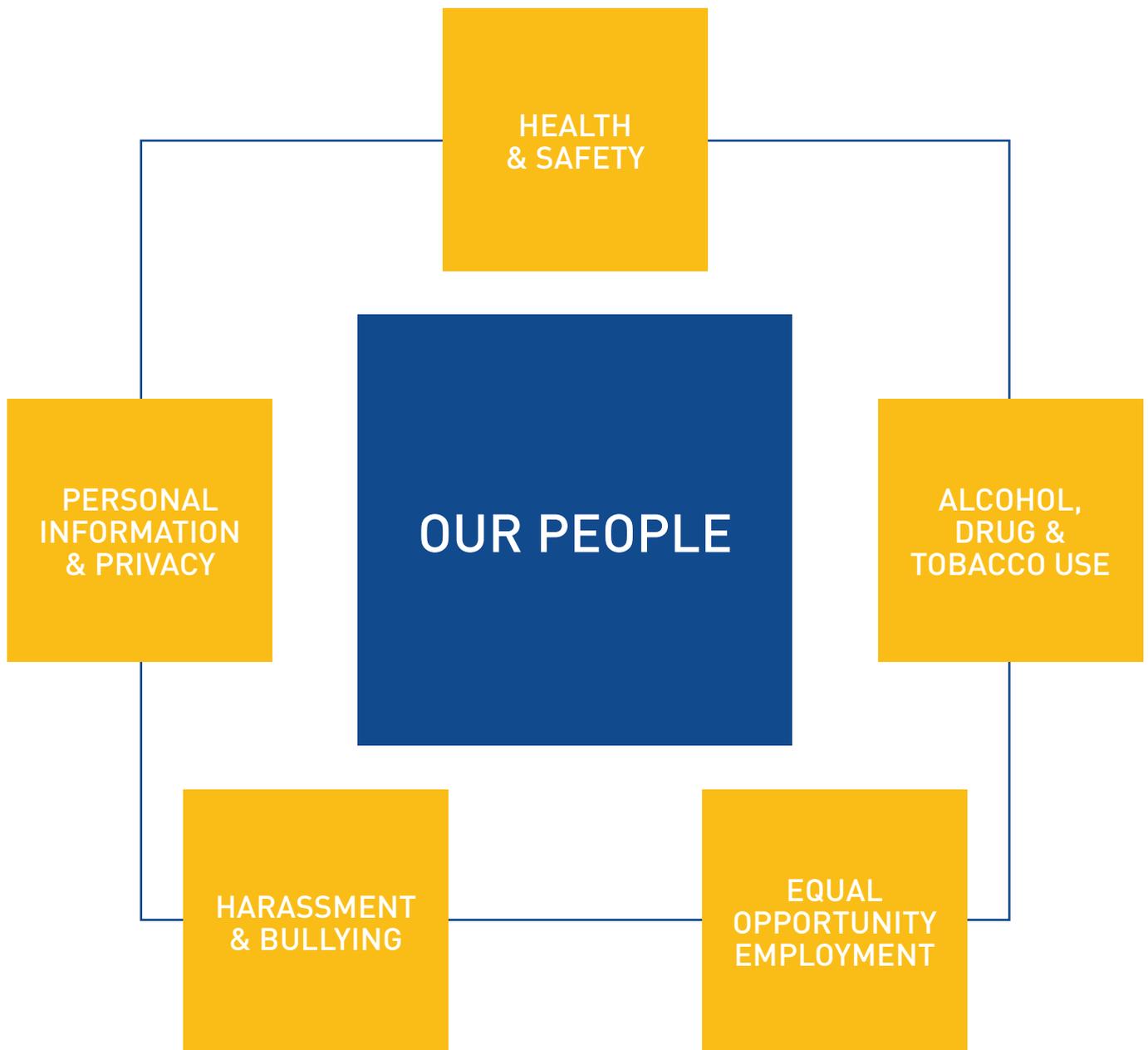
- Discussions with supervisors and managers about desired behaviours
- A verbal or written warning
- Suspension
- Dismissal

An example of legal action may be the requirement to recover MaxiTRANS' assets or the seeking of costs for damages. Breaches of the Code, which constitute criminal conduct, may also result in criminal prosecution. If the Code breach is a violation of the law, the matter may be referred to the appropriate law enforcement authorities.

OUR EXPECTATIONS OF YOU

Always abide by the provisions set out in the Code, raise concerns promptly and fully cooperate with business conduct investigations. In addition to failing to comply with the Code directly, misconduct, which may result in disciplinary action, includes:

- Requesting others to breach the Code or our Values
- Failing to raise promptly any known or suspected breaches of the Code
- Failing to cooperate in investigations of possible breaches of the Code
- Retribution/Retaliation against another person/s for reporting a business conduct concern
- Failing to demonstrate leadership and diligence to ensure compliance with the Code, our Values and the law





Our Core Value at MaxiTRANS is to send all our people home safely and to provide a healthy and safe working environment for all employees.

MaxiTRANS is committed to conduct all business activities in a responsible manner, which assures the health, safety and security of our people, the quality of the products and services produced, the preservation of the environment and compliance with all applicable health, safety, environmental, security, legal, quality and regulatory requirements in countries where we operate.

Our core value is to send all our people home safely every day and delivering this commitment is the core accountability of the executive leadership team and all staff of MaxiTRANS.

MAXITRANS EXPECTS YOU TO

Maxitrans has a duty of care to provide a work environment that is safe and without risk to employees' health. All employees have a responsibility to take reasonable care of themselves and those who they work with. Across the organisation, health and safety practices are governed by standards, policies and procedures that apply to all employees. For a safe workplace, we can all enjoy, please be aware of all relevant standards, policies and procedures and adhere to them.

Managers are accountable for the implementation of these standards, policies and procedures and for ensuring that supporting systems are in place. All employees must understand and follow site and business health and safety requirements, and promptly report any circumstances that represent a threat to your health and safety or the health and safety of others.

Make sure you:

- Know how to apply and always comply with our health and safety standards, policies and procedures and assist others to do the same.
- Identify, assess and take steps to control health and safety hazards in your work area and know how/who to report issues/hazards to.
- Prior to commencing any task undertake a 'Take Two' assessment to ensure completion of the task is made significantly safer.
- Use the personal protective equipment required for the task you are performing and ensure others do the same.
- Handle and dispose of all hazardous materials properly, safely and lawfully.
- Make sure you know what to do in the case of any emergency and that visitors are familiar with emergency.

You must not:

- Undertake work unless you have been trained, are competent, medically fit and sufficiently rested and alert to do so.
- Undertake work when you may be under the influence of alcohol or drugs (illegal, legal or prescribed).
- Use or tolerate threats, intimidation, harassment, bullying or violence at work.
- Assume that someone else will report a risk or concern and that you do not need to raise it.



ALCOHOL, DRUG & TOBACCO USE

MaxiTRANS workplaces are to be free from alcohol and illegal substances.

MaxiTRANS is committed to providing a safe and healthy work environment and expects all employees, contractors and visitors to be able to function at an acceptable level of performance and not be affected by alcohol or legal or illegal drugs. MaxiTRANS workplaces are 'dry sites' and no alcohol may be consumed at any time on any MaxiTRANS site. MaxiTRANS has a policy of zero tolerance for both alcohol and drugs in the workplace. All employees, contractors and visitors are expected to be drug free and .00 for alcohol when on a MaxiTRANS site. MaxiTRANS also restricts smoking on its sites to designated smoking areas. The possession or use of illegal substances at MaxiTRANS workplaces, functions or in conjunction with MaxiTRANS, business is strictly prohibited. MaxiTRANS does recognise alcohol and drug dependence as an illness. An employee with a dependency on drugs or alcohol should be treated in the same way as an employee with any other illness.

MAXITRANS EXPECTS YOU TO

To prevent passive smoking and to prevent smoke entering work areas, designated smoking areas are clearly defined. Smoking is only permitted in these areas. All people on site are expected to be alcohol and drug free. All employees and visitors to MaxiTRANS workplaces may be subject to drug and alcohol testing. If you have a drug or alcohol dependency, you are expected to seek help and undertake appropriate rehabilitation treatment. Please contact Converge International our Employee Assistance Provider (EAP) in Australia on **1300 687 327** and New Zealand on **0800 666 367** to make an appointment.

Make sure you:

- Report to work fit and ready to carry out assigned work.
- Recognise and take action on the early symptoms of a dependency condition in yourself, someone you work with or supervise.
- Treat matters of dependency with respect and confidentiality. Raise concerns with your supervisor, manager or your Human Resources representative.
- Advise your supervisor/manager if you have any doubts about your fitness to work.
- Cooperate with MaxiTRANS alcohol/ drug testing programs.
- Report the use of prescribed medication which could potentially affect performance to your Supervisor.

You must not:

- Undertake work (including driving to and from work and attending work functions) when you are impaired by alcohol or drugs (illegal, legal or prescribed).
- Consume or offer alcohol to others at MaxiTRANS sites or offices.
- Possess, use or transfer illegal drugs or substances at MaxiTRANS sites or offices.
- Smoke on a MaxiTRANS site, in an office or in a company vehicle – except in the designated smoking area.
- Ignore substance abuse.



EQUAL OPPORTUNITY EMPLOYMENT

We are committed to developing and maintaining a diverse and inclusive workplace where every employee is treated fairly and with respect, has the opportunity to realise their full potential and contribute to our Company's success.

Employment, development opportunities and promotions at MaxiTRANS are offered on merit. All employees and applicants for employment will be treated and evaluated according to their job-related skills, qualifications and capabilities. Decisions based on attributes unrelated to job performance, such as race, gender, sexuality or family responsibilities, constitute unlawful discrimination and are prohibited.

MAXITRANS EXPECTS YOU TO

Together, you and your supervisor or manager are responsible for ensuring that you know what is required of you in your job, have open, constructive performance discussions, are supported to develop your work-related capabilities, you must treat people fairly, with respect and dignity and without discrimination.

Make sure you:

- Demonstrate fairness and respect in all your dealings, consistent with our Values.
- Ensure employment related decisions, including recruitment, promotion, training and development, compensation and termination of employment are based only on merit and business considerations.
- Respect the human rights of our employees, contractors and business partners.
- Ask your Human Resources representative if you have any questions about the application of laws.
- Report any evidence of improper treatment of employees in our operations directly to your supervisor, manager or Human Resources representative.

You must not:

- Tolerate unlawful discrimination of any type.
- Make decisions based on attributes unrelated to job capabilities or performance.



HARASSMENT & BULLYING

MaxiTRANS does not tolerate any form of harassment or bullying in any of our workplaces. Our Values support a culture where we treat people fairly, respectfully and with dignity.

Harassment is an action, conduct or behaviour that the recipient perceives as unwelcome, humiliating, intimidating or offensive. Bullying is repeated verbal, physical, social or psychological abuse by a person or group of people.

Workplace Harassment and Bullying should not be confused with constructive feedback or coaching on work performance or work-related behaviour of an individual or group for development.

MAXITRANS EXPECTS YOU TO

Never engage in actions or behaviours that involve Harassment or Bullying. You are expected to be inclusive, collaborative and supportive. It is important that you consider the implications of your behaviours, and support your colleagues to speak up and raise concerns.

MaxiTRANS is governed and abides by each country's laws and regulations regarding the fair and proper treatment of people. Always be aware of cultural considerations and demonstrate respect, particularly when travelling overseas on MaxiTRANS business.

Make sure you:

- Treat everyone with respect and dignity in line with our Values.
- Speak up if you are uncomfortable or upset with someone's comments or behaviours, and talk it through.
- Be prepared to adapt your own behaviour in response to feedback or when encountering different cultural beliefs, particularly if traveling overseas on MaxiTRANS business.
- Feel comfortable speaking up, even if the inappropriate behaviour is not directed at you.
- Encourage and insist on a workplace free of Harassment and Bullying.

You must not:

- Behave in a way that is offensive, insulting, intimidating, malicious or humiliating.
- Make jokes or comments about a person's race, gender, ethnicity, religion, sexual preference, age, physical appearance or disability.
- Assume acceptable behaviours are the same for every culture.
- Engage in sexual harassment.
- Distribute or display offensive material, including inappropriate pictures or cartoons.
- Use MaxiTRANS resources to distribute offensive materials.



MaxiTRANS respects your personal information and privacy, and expects you to respect the personal information and privacy of others.

MaxiTRANS will only collect, use, disclose and retain personal information that is necessary to meet business requirements, as permitted by law, in places where we operate.

Personal information means any information, which could identify an individual, either from that information alone or in combination with other information, which is reasonably likely to come into the possession of MaxiTRANS. Personal information will be collected in a lawful and fair manner and in a way, which is not unreasonably intrusive. We will not use or disclose such information in a manner that is incompatible with the purpose for which it was collected, except as permitted by law. To the extent permitted by law, MaxiTRANS reserves the right to monitor or audit employee use of its information systems, and access electronic communications or information stored on systems, devices or equipment for safety, maintenance, business needs or to meet a legal or policy requirement.

MAXITRANS EXPECTS YOU TO

Understand our standards and procedures on personal information and privacy. If you have, any doubts about the handling of personal information consult your Human Resources representative. Information on MaxiTRANS computers and within emails may be accessed for legal or other reasons. Always treat the personal information and privacy of others with respect.

Make sure you:

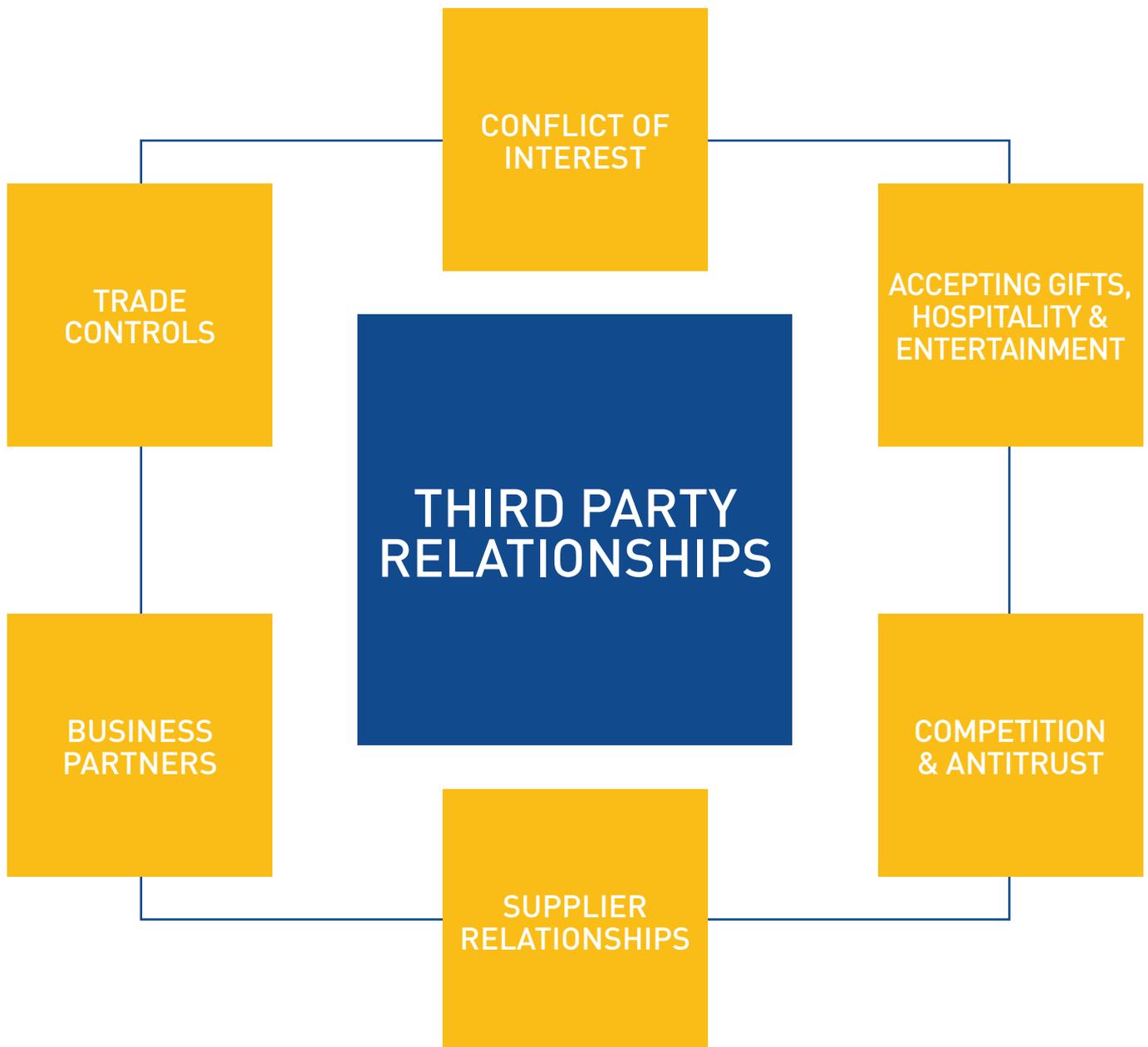
- Collect personal information directly from the individual concerned where reasonable and practical.
- Comply with all legal requirements that apply to the collection, use, disclosure and retention of personal information.
- Only collect, use, disclose and retain personal information that is necessary for legitimate activities and functions.
- Use personal information in a way that is consistent and compatible with the purpose for which it was collected, unless otherwise approved by the relevant individual.

You must not:

- Access personal information unless you have appropriate authorisation and a clear business need.
- Provide personal employee information to anyone inside or outside of MaxiTRANS without proper written authorization of the employee involved.
- Conduct reference or security checks without proper authorisation or the consent of the individual.
- Move personal information between various MaxiTRANS legal entities or outside the country of origin without checking on the correct process.



THIRD PARTY RELATIONSHIPS





CONFLICT OF INTEREST

It is important to always be mindful of any relationship or association, which may be, or appear to be, a conflict of interest with MaxiTRANS business interests.

Employees and others acting on behalf of MaxiTRANS must be free from conflicts of interest that could adversely influence their judgement, objectivity or loyalty to the company in conducting MaxiTRANS business activities and assignments. Conflicts of interest may affect or have the appearance to affect sound and professional judgement adversely. Conflicts of interest or perceived conflicts of interest must be declared and managed to ensure integrity and transparency. When declared, the conflict of interest should be avoided or where this is not possible, action must be undertaken to ensure that the conflict (or perceived conflict) is managed in a transparent and appropriate manner.

MAXITRANS EXPECTS YOU TO

Employees are responsible for identifying, declaring and managing conflicts of interest that apply to them. All employees are expected to follow the company's Conflict of Interest guidelines set out in MaxiTRANS Code of Conduct.

Make sure you:

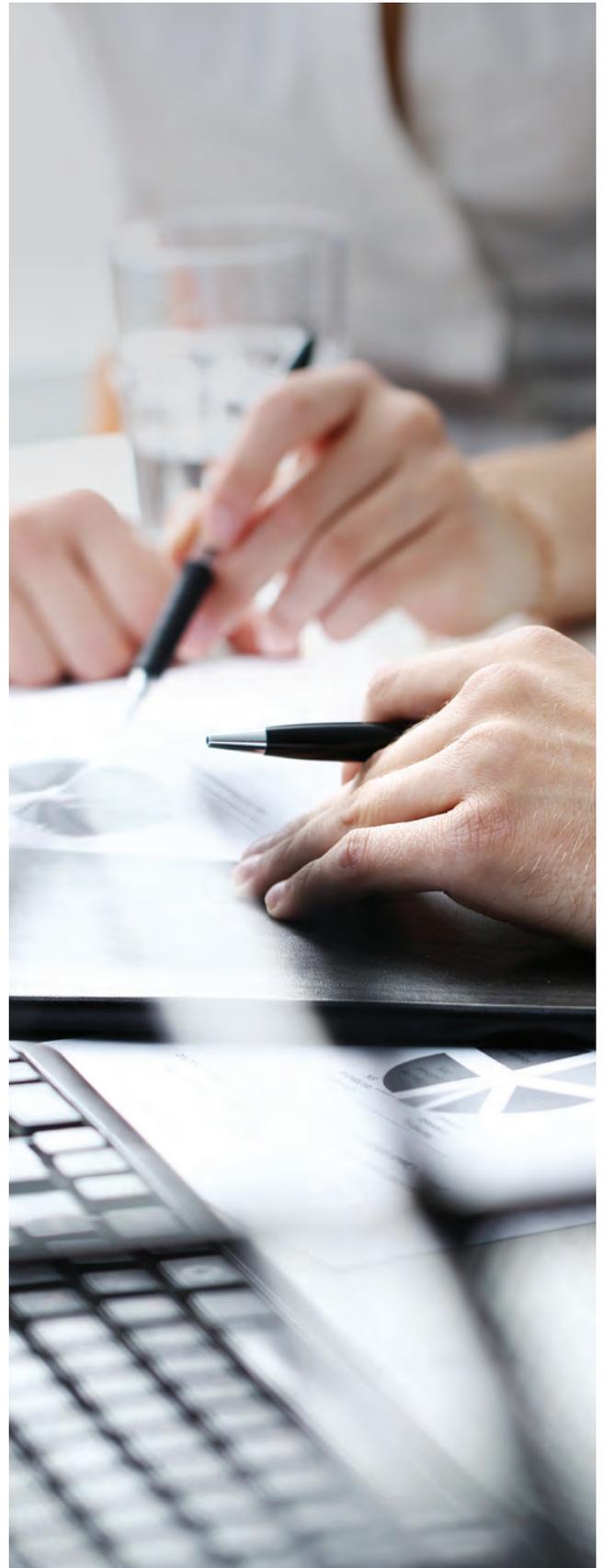
- Conduct all business relationships in a professional, impartial and competitive manner.
- Avoid business dealings and personal relationships that cause or may cause conflicts of interest or create the appearance of a conflict.
- Advise your direct manager in writing of any outside activities, financial interests or relationships that may involve you in a conflict of interest or the appearance of one.
- Obtain appropriate approval before accepting a position (including a Board position) with another company or organisation that is in competition with MaxiTRANS.
- Excuse yourself from any decision-making process where you have an interest that influences, or is perceived as influencing, your ability to make an objective decision and fulfil your responsibilities to MaxiTRANS.



CONFLICT OF INTEREST

You must not:

- Hold positions of investments in organisations that have business dealing with MaxiTRANS, if you are in a position to influence transactions or if the relationship itself creates an actual, potential or perceived conflict of interest.
- Hire, promote or directly supervise a relative or someone that you are having a personal relationship with, unless this has been specifically authorised.
- Have personal/sexual relationship with employees or family members of competitors, suppliers, customers or dealers that could lead to a bias in decision making.
- Misuse MaxiTRANS resources or your position of influence at MaxiTRANS to promote or assist an external activity or party.
- Personally pursue or undertake any opportunities in which MaxiTRANS could have an interest and that are identified using MaxiTRANS information, property or resources.





ACCEPTING GIFTS, HOSPITALITY & ENTERTAINMENT

Accepting gifts, hospitality and entertainment must only be undertaken in accordance with MaxiTRANS policies.

Accepting gifts, hospitality or entertainment can be a legitimate way of building good business relationships. It is important that they are never used to unduly influence business decision-making or cause others to perceive that there has been improper influence.

MAXITRANS EXPECTS YOU TO

Exercise extreme care when accepting gifts, hospitality or entertainment in order to protect the reputation of third parties and MaxiTRANS against allegations of improper behavior. Gifts, hospitality or entertainment should only be accepted if they are occasional and of modest value and considered not to influence in anyway the judgement of an employee in their loyalty to MaxiTRANS. Determining what is occasional and modest is a matter of judgement. Gifts, hospitality and entertainment of any kind must not be requested from anyone MaxiTRANS conducts business with, including suppliers, customers and business partners.

Make sure you:

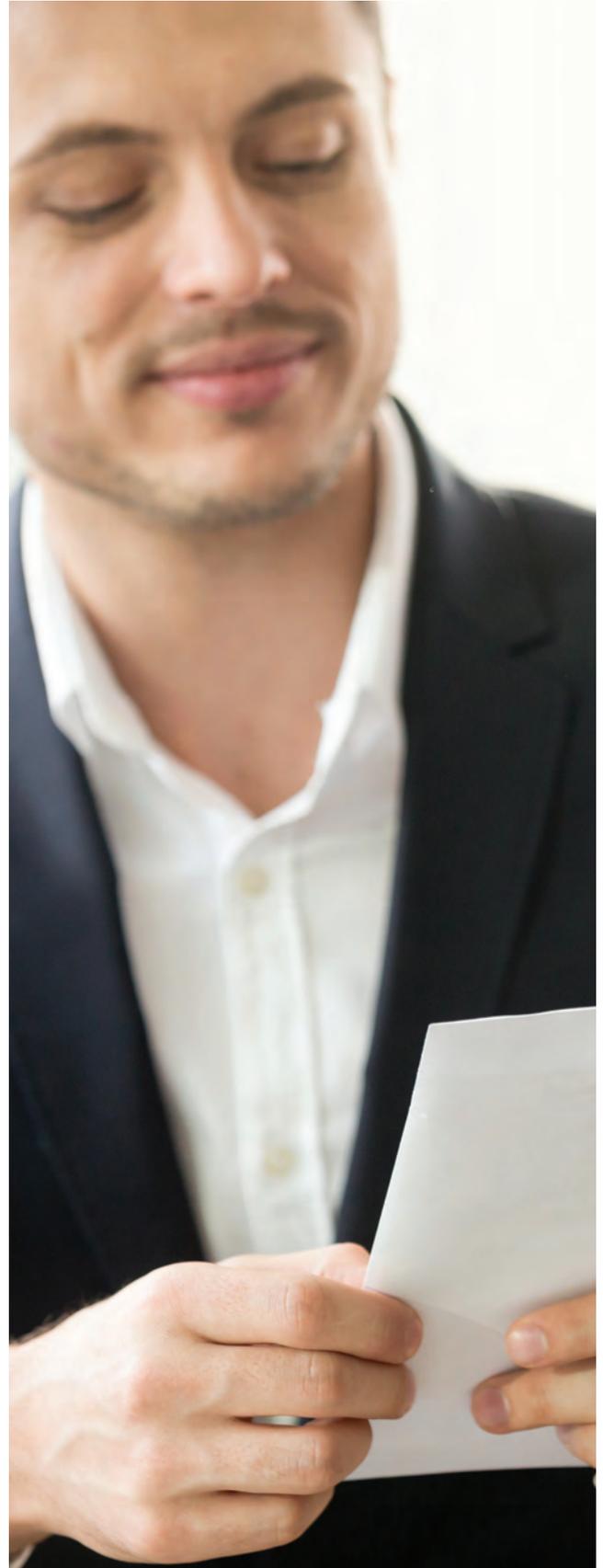
- Record any gift, hospitality or entertainment accepted/rejected or returned.
- Only accept gifts, hospitality and entertainment, which are modest and comply with MaxiTRANS policies, applicable laws and regulations.
- Clearly articulate MaxiTRANS requirements on accepting gifts, hospitality and entertainment at the beginning of new business relationships, especially where cultural norms may be different from those outlined in the Code.
- Assess the potential for a conflict of interest when accepting gifts, hospitality or entertainment.
- Be prepared to decline politely any offer not in line with our policies, applicable laws and regulations.



ACCEPTING GIFTS, HOSPITALITY & ENTERTAINMENT

You must not:

- Accept gifts, favours or any form of hospitality or entertainment in return for business services, information or a business advantage.
- Accept gifts, hospitality or entertainment of an inappropriate value.
- Request a gift, hospitality, or entertainment of any kind from a supplier, customer, partner or other party with whom MaxiTRANS does business. This includes both direct requests and giving the impression that the offer of a gift or hospitality would be appropriate or desirable.
- Retain a gift or accept hospitality or entertainment above a modest value without obtaining authorisation in accordance with MaxiTRANS policies.





SUPPLIER RELATIONSHIPS

MaxiTRANS aims to have effective, streamlined processes with suppliers, and encourage suppliers to adopt standards similar to those of MaxiTRANS.

Relationships with suppliers providing MaxiTRANS with goods or services can make a significant contribution to the success of the business. Through their actions, suppliers can directly impact the financial performance and profitability of MaxiTRANS, as well impacting our reputation. We take great care in operating a fair and equitable procurement process. Our selection process aims to clearly inform potential suppliers of our expectations and standards and the requirements applicable to them.

MAXITRANS EXPECTS YOU TO

Always seek suppliers who share our commitment to lawful business practices conducted according to a high standard of business conduct. If there is any doubt or concern in relation to the supplier or potential supplier's integrity or ability to perform the contract, you should ensure that these issues are addressed immediately.

Make sure you:

- Seek to obtain a competitive bid in appropriate circumstances.
- Help our suppliers understand MaxiTRANS' compliance and business conduct requirements.
- Ensure that agreements clearly state the services or products to be provided, the basis for payment and the applicable rate or fee.
- Conduct regular reviews of supplier relationships and performance.
- Verify the invoice clearly ensuring it represents goods and services provided.
- Be alert to, and report to your supervisor or manager any activity by a supplier that is inconsistent with our business conduct requirements.

You must not:

- Use suppliers who supply unsafe or environmentally irresponsible products or services, breach laws or regulations or use a child or forced labour.
- Give one supplier's confidential business information directly or indirectly to another supplier.



MaxiTRANS is committed to complying with competition laws.

MaxiTRANS is committed to full compliance with competition laws and the enforcement of competition laws against those third parties who act in an anti-competitive manner towards MaxiTRANS.

MAXITRANS EXPECTS YOU TO

In all dealings with MaxiTRANS competitors, customers, suppliers and business partners, you are required to conduct yourself in a manner that does not breach competition laws.

Breach of competition laws can result in serious consequences for MaxiTRANS and employees, including fines and imprisonment. MaxiTRANS regards any breach of competition laws as serious misconduct, which may lead to disciplinary action and possible termination of employment. In all dealings with competitors, in both formal and informal settings, you should be mindful of the perception and effect of these dealings. Where MaxiTRANS is the victim of anti-competitive behaviour, this can lead to unnecessary additional costs for the Company and reduced productivity. If you suspect anti-competitive behaviour by a MaxiTRANS employee, contractor or third party, you must report it immediately.

Make sure you:

- Maintain MaxiTRANS' independence of judgement in pricing, marketing and selling of any product.
- Consider the appearance and implications of interacting with a competitor, whether in a business or personal setting. Avoid any action, which could imply illegal coordination with competitors.

You must not:

- Collude with a competitor by fixing, raising, lowering or stabilising prices of goods sold or purchased;
- Collude with a competitor by fixing other competitive terms such as pricing formulae, discounts, margins, rebates, commissions or credit terms;
- Obstruct a competition authority by providing false or misleading information, concealing or destroying documents or alerting any third party to the fact of a competition law investigation.



BUSINESS PARTNERS

MaxiTRANS will always exercise care when selecting a business partner and expects Business Partners to contribute positively to MaxiTRANS' business reputation.

Business partners is the term used to define joint venture partners or co-investors, or third parties who interact with others on behalf of MaxiTRANS. This includes agents, brokers, intermediaries, advisers, consultants, representatives, travel agents, freight forwarders, customs or visa agents, tax advisers, law firms and accountants. Any improper conduct by business partners could damage MaxiTRANS reputation and potentially expose the Company and individual employees to criminal or civil liability or other penalties.

MAXITRANS EXPECTS YOU TO

You must exercise care when selecting a business partner. Do not engage any business partner if there is a risk they will disregard our Values and anti-corruption laws when acting on MaxiTRANS' behalf.

Prior to engaging a business partner you must always obtain the approval from your General Manager and check the validity of all provided background information and conduct the specific due diligence mandated by our procedures.

You should be satisfied that the business partner is reputable, competent and qualified to perform the work for which they are being hired and that the compensation sought is reasonable.

Make sure you:

- Obtain approval from your Functional General Manager before engaging a business partner (including conducting mandated due diligence).
- Monitor the conduct of business partners including checking invoices and querying any unclear or suspicious amounts.
- Raise any concerns or suspicions about the conduct of business partners with your Functional General Manager or FairCall.
- Ensure all payments made by business partners on our behalf are appropriate.

You must not:

- Ignore warning signs that a business partner may be engaging in prohibited conduct. Warning signs include unusual claims for reimbursement and disproportionate remuneration claims.
- Use or continue to use a business partner if you are aware of, or suspect, improper behaviour. Any issues must be thoroughly investigated and satisfactorily resolved and the resolution properly documented if the business arrangement is to be continued.



TRADE CONTROLS

MaxiTRANS is committed to complying with all applicable national and international laws, regulations and restrictions relating to the international trade in goods, materials, technology, software and services, including trade sanctions and export controls.

Trade sanctions are laws that restrict trade with particular countries and/or individuals. For example, trade sanction laws may prohibit exports to a sanctioned country; imports or dealings in property originating from a sanctioned country; other transactions with sanctioned governments, individuals or entities.

Export controls are laws, which regulate the movement of specific items across international borders. For example, export control laws may require a licence to be obtained or otherwise prohibit any export of specific items listed on various 'controlled lists' maintained by the United States, United Kingdom, Australia and European Union. These items are often capable of being used in military applications, which is why their export is restricted.

MAXITRANS EXPECTS YOU TO

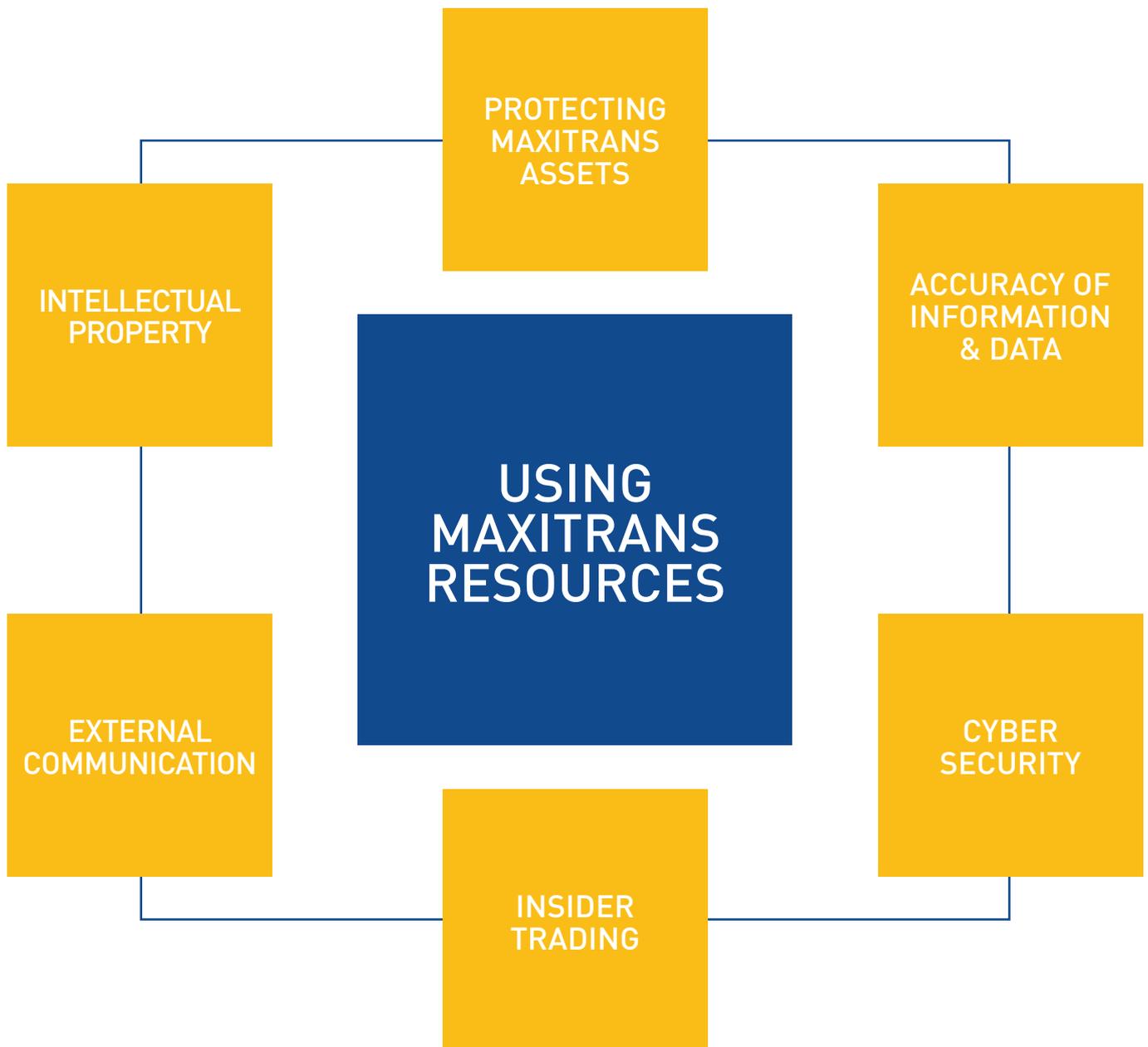
Trade sanctions are subject to frequent change. Always check with your manager or MaxiTRANS' in house Counsel if you are uncertain whether a transaction would breach trade sanctions, existing laws, regulations or restrictions.

Make sure you:

- Ensure that MaxiTRANS and its agents provide accurate and complete information to government authorities, including accurate and complete import and export declarations.
- Screen all your business partners, suppliers and other parties involved in international transactions against consolidated government watch lists as required.

You must not:

- Engage in negotiations, discussions or transactions of any kind with entities in countries, which are subject to trade sanctions under laws applicable to MaxiTRANS.
- Proceed with an export or other business transaction if there is any doubt about whether the transaction might breach trade controls laws.





PROTECTING MAXITRANS' ASSETS

As employees of MaxiTRANS, we all have an obligation to protect the Company's assets and use them for their intended purpose.

MaxiTRANS' assets exist in various forms and include physical and non-physical property, such as designs, engineering drawings, know-how, equipment, inventory information technology, intellectual property, information and data. Competitively sensitive and proprietary information must be treated as an asset and be protected from unauthorised use or disclosure. This may include strategic and marketing plans; information used in trading activities; operational data, such as production and maintenance data, master data and data related to our equipment, process control systems; research and other technical data. You should not share any of this kind of information unless authorised to do so. If you are not sure what you can share, ask your supervisor or manager. MaxiTRANS' assets should at all times be used for the purpose and in the manner intended.

MAXITRANS EXPECTS YOU TO

You are responsible for appropriately using and safeguarding MaxiTRANS' assets, both physical and non-physical. You are also expected to respect both the non-physical and physical assets of others, and never knowingly damage or misappropriate those assets.

Make sure you:

- Comply with applicable Company requirements and laws regarding the use of our assets.
- Use MaxiTRANS' assets for their intended purpose.
- Protect our assets from waste, damage, misuse, loss, fraud or theft.
- Report any potential waste, damage, misuse, loss, fraud or theft of our assets.
- Ensure third parties (such as suppliers) follow the required standards, policies and procedures when dealing with MaxiTRANS' assets.
- Prevent non-authorised personnel from accessing our facilities, information, data or other assets, where possible and safe to do so.

You must not:

- Use MaxiTRANS' assets for personal gain.
- Enter into any fraudulent or illegal transactions involving our assets.
- Permit unauthorised entry to a MaxiTRANS site or office or access to our information technology.
- Ignore security complaints or an inadequate security procedure that may present threats to either MaxiTRANS employees or assets. Immediately raise any concerns with your supervisor or manager.



ACCURACY OF INFORMATION & DATA

We should always demonstrate accuracy of MaxiTRANS' data and information concerning MaxiTRANS or its business activities. This may include financial, production, operational, project, health, safety, environmental, resource, time keeping or other information and in all formats.

Our employees, contractors and business partners performing work for MaxiTRANS need to comply with all applicable financial, regulatory and other applicable reporting requirements, laws and regulations in each jurisdiction in which we operate, as well as our own MaxiTRANS requirements. All financial transactions must be evidenced by appropriate source documents, verified for their validity and accuracy, properly authorised and accurately and completely recorded in the relevant accounts and records as required by law and MaxiTRANS requirements. This applies to all financial information, including purchase orders, receiving documents, invoices, travel and expense records, journal entries and tax filings. Once created, data must be appropriately retained, protected and disposed of according to applicable laws and regulations.

MAXITRANS EXPECTS YOU TO

All data created and maintained by our employees, contractors and business partners must accurately reflect the underlying transactions and events. There is never a justification for falsifying records or misrepresenting facts or engaging in fraudulent behaviour. Falsifying, concealing, altering, destroying or otherwise tampering with information, or creating misleading information will not be tolerated by MaxiTRANS.

If you are responsible for reporting information, whether financial or non-financial, you have a responsibility to ensure that adequate internal controls exist to achieve truthful, accurate, complete, consistent, timely and understandable reports.

Make sure you:

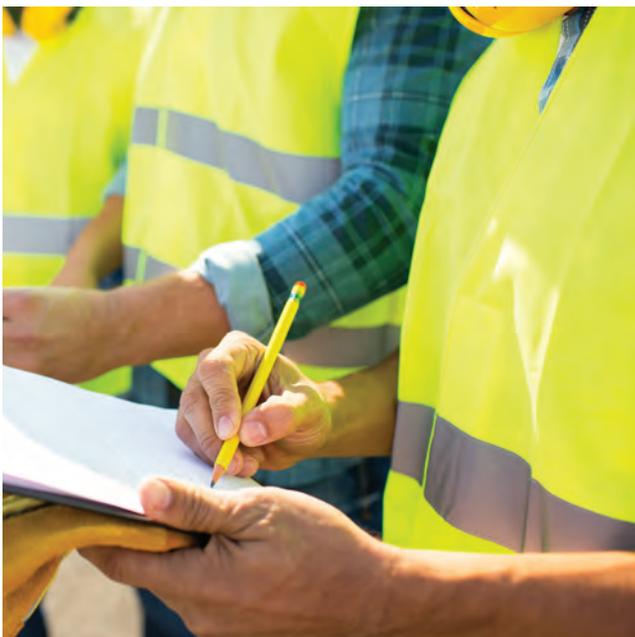
- Cooperate with auditors and disclose all pertinent information that could reasonably impact the results of an audit, whether favourable or unfavourable.
- Report any actual or suspected irregularities or weaknesses in relation to internal controls, accounting or reporting (whether financial or non-financial) matters.
- Immediately report any actual or suspected instances of fraud and misconduct.
- Keep accurate, complete and true Company books, records, accounts, documentation and reports in accordance with applicable laws, regulations, standards and procedures.



ACCURACY OF INFORMATION & DATA

You must not:

- Falsify any record, make a false, or misleading entry (financial or non-financial), including omitting information that makes the entry false or misleading in a report, record, system or expense claim.
- Conceal information from auditors that could impact the results of the audit.
- Influence or allow others to do anything that would compromise the integrity of MaxiTRANS' records or reports.
- Conceal or tamper with Company records or documents.





MaxiTRANS is committed to personal and corporate security by increasing employees' cyber security awareness and taking measures to protect our information systems and data.

Computer hardware, software and data stored on MaxiTRANS' information technology system, as well as MaxiTRANS data stored on personal devices, are ultimately the property of MaxiTRANS. The safeguarding of this information technology and data is the responsibility of all MaxiTRANS employees. Security controls are in place and reviewed continuously to protect against emerging cyber threats. We provide employees with information technology to undertake work for MaxiTRANS. The provided information technology should be used in a secure and responsible manner and adequately protected against damage, loss, theft, alteration or unauthorised access. The inappropriate use of information technology or data may expose MaxiTRANS to risks, including virus attacks and security breaches of our information technology. In the event that MaxiTRANS information technology and data are used inappropriately or inappropriate material is accessed or stored using our systems, disciplinary action including dismissal may be taken and civil and/or criminal authorities may be notified. MaxiTRANS reserves the right to access, review and disclose data stored on MaxiTRANS systems for the purposes of maintenance, business needs or to meet legal or policy requirements.

MAXITRANS EXPECTS YOU TO

We understand that modest personal use of MaxiTRANS information technology is sometimes required. Please be aware your use of information technology will be monitored, reported and where required blocked for the purposes of mitigating risk and complying with laws, regulations and MaxiTRANS standards. Inappropriate use of our technology and data may include; using it for purposes connected with cybercrime; using it for the purposes of duplication or sale of software or media files, including portions of audio, video or electronic images; publishing MaxiTRANS data without permission; using MaxiTRANS information technology or data for non-MaxiTRANS business purposes; removing MaxiTRANS data or intellectual property without authorisation to do so.

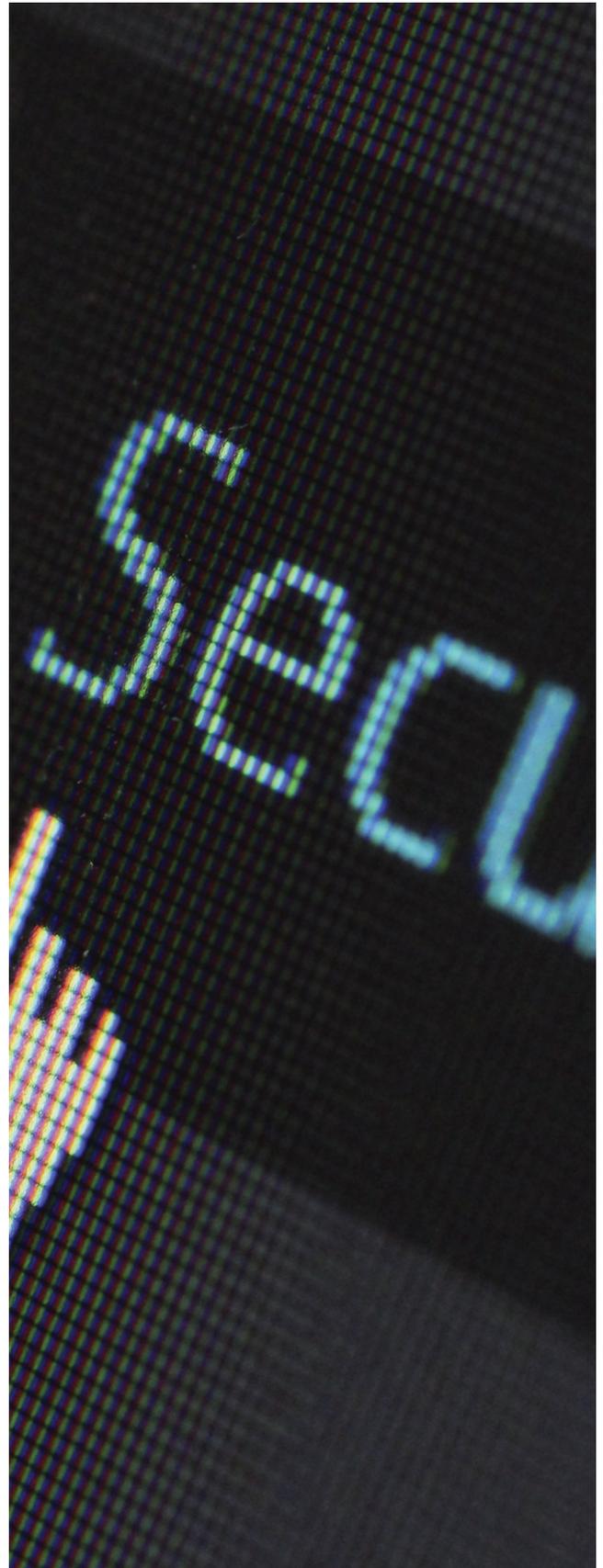


Make sure you:

- Ensure hardware, software and data for which you are responsible is appropriately safeguarded and advise your IT representative if it is lost or stolen.
- Take necessary steps to prevent unauthorised access to company sensitive data.
- Use caution when opening email attachments and clicking links, which have been, received from unknown senders or unfamiliar email addresses.

You must not:

- Share or divulge your password to anyone or reuse passwords across systems.
- Leave information technology or mobile devices unattended in public places particularly while travelling.
- Engage in online fraud or commit a crime online.
- Install software or connect hardware without licence and authorisation.
- Deliberately access, store, send, post or publish inappropriate material, or ignore others doing so.
- Never provide personal or company information to unknown contacts/ third parties.





In the course of your job, you may learn of information about MaxiTRANS or other companies – for example, a competitor, joint venture partner, customer or supplier – before it is made public. Using this information for your financial or other personal benefit or conveying this information to others may be illegal.

Inside information is price sensitive information about a company that is not generally available to the public. Whether the information is price sensitive is generally judged by whether it would affect a reasonable investor's decision about whether or not to invest in a company or not. If you buy or sell shares while in possession of inside information, or give that information to someone else so that they can trade in securities, you will be guilty of a criminal offence. It may also be a breach of your obligations of confidentiality to disclose information, irrespective of whether the information is used to deal in the relevant company's securities.

A common misconception is that only directors and senior management can be guilty of insider trading. In fact, anybody – employees, contractors, family, friends and investment advisers – can also be guilty of insider trading.

MAXITRANS EXPECTS YOU TO

Exercise caution if you are (or think that you might be) in possession of confidential or sensitive information about MaxiTRANS or another company. If you are a director or a member of senior management, you must comply with the MaxiTRANS Code of Practice if you want to buy or sell MaxiTRANS shares.

Make sure you:

- Maintain the confidentiality of MaxiTRANS information.
- Report any leaks of MaxiTRANS information you become aware of to your supervisor, manager or the 'FairCall' hotline service.
- Carefully consider the information you disclose about what you are working on, where you are going on MaxiTRANS business, who visited the office, site, or what you talk about with other MaxiTRANS employees.
- Comply with the MaxiTRANS Code of Practice.

You must not:

- Disclose inside information to anyone outside MaxiTRANS, including family and friends, unless it is appropriately authorised, documented and is necessary for the Company's business activities.
- Spread false information or engage in other activities to manipulate the price of publicly listed securities.
- Trade in MaxiTRANS shares or other companies when you have access to inside information that, if made public, could reasonably be expected to affect that company's share price.
- Accidentally disclose inside information. For example, avoid talking about confidential information in an open area, or leaving confidential information on a copy machine.



EXTERNAL COMMUNICATION

As a publicly listed company, MaxiTRANS is required to provide timely, accurate, consistent, complete and fair disclosure of information to enable investors to make informed and orderly market decisions.

MaxiTRANS' public disclosures must only be made by authorised spokespersons. Any public written or verbal communication that can be attributed to MaxiTRANS or to one of our employees may amount to a public disclosure. Such communication includes regulatory filings, such as annual reports, briefings on profit and business performance; interviews, articles and reports; information contained on the MaxiTRANS website and other communications channels including social media. MaxiTRANS will immediately release through the ASX any information on major developments which a reasonable person would expect to have a material effect on the share price, or a reasonable investor is likely to use as part of the basis for making investment decisions, subject to any exceptions under the applicable laws.

MAXITRANS EXPECTS YOU TO

If you associate yourself with, or are likely to be associated with, MaxiTRANS when you communicate externally, our Values and the Code of Conduct apply, including provisions relating to harassment, privacy, our information technology, insider trading, intellectual property and this section on communicating externally. Apply the same principles of media to social media, and only respond on behalf of MaxiTRANS if you are authorised to do so.

Make sure you:

- Make sure you comply with all applicable Company policies and ensure all public communication is complete, fair, accurate, timely and clear.
- Obtain all relevant approvals prior to publicly releasing material.
- Report the loss or theft of MaxiTRANS information (for example, your computer, mobile phone or documents) to the IT Department and your manager immediately.
- Report immediately if you think/know your IT equipment has been hacked or compromised in any way.

You must not:

- Disclose information to the public, including the media and members of the investment community, unless you are specifically authorised to do so.
- Divulge what may be confidential information, either internally or externally, unless you are specifically authorised to do so. If you are unsure about the degree of confidentiality assigned to information, contact your immediate manager.
- Conceal facts or omit information that may be relevant to a disclosure.
- Make disparaging remarks/comments about the company.



INTELLECTUAL PROPERTY

We need all of our employees to safeguard MaxiTRANS' intellectual property from unauthorised use by outsiders. We also expect our employees to respect the intellectual property rights of others.

Intellectual property (IP) can be an invention, trademark, original design or the practical application or expression of an idea that has commercial value. IP is MaxiTRANS' property in the same way as physical assets belong to MaxiTRANS. It is often highly valuable. As markets become increasingly competitive, protecting our IP is essential. In addition, as it has been developed by MaxiTRANS, it may be protected under law relating to copyright, patents or trademarks.

MAXITRANS EXPECTS YOU TO

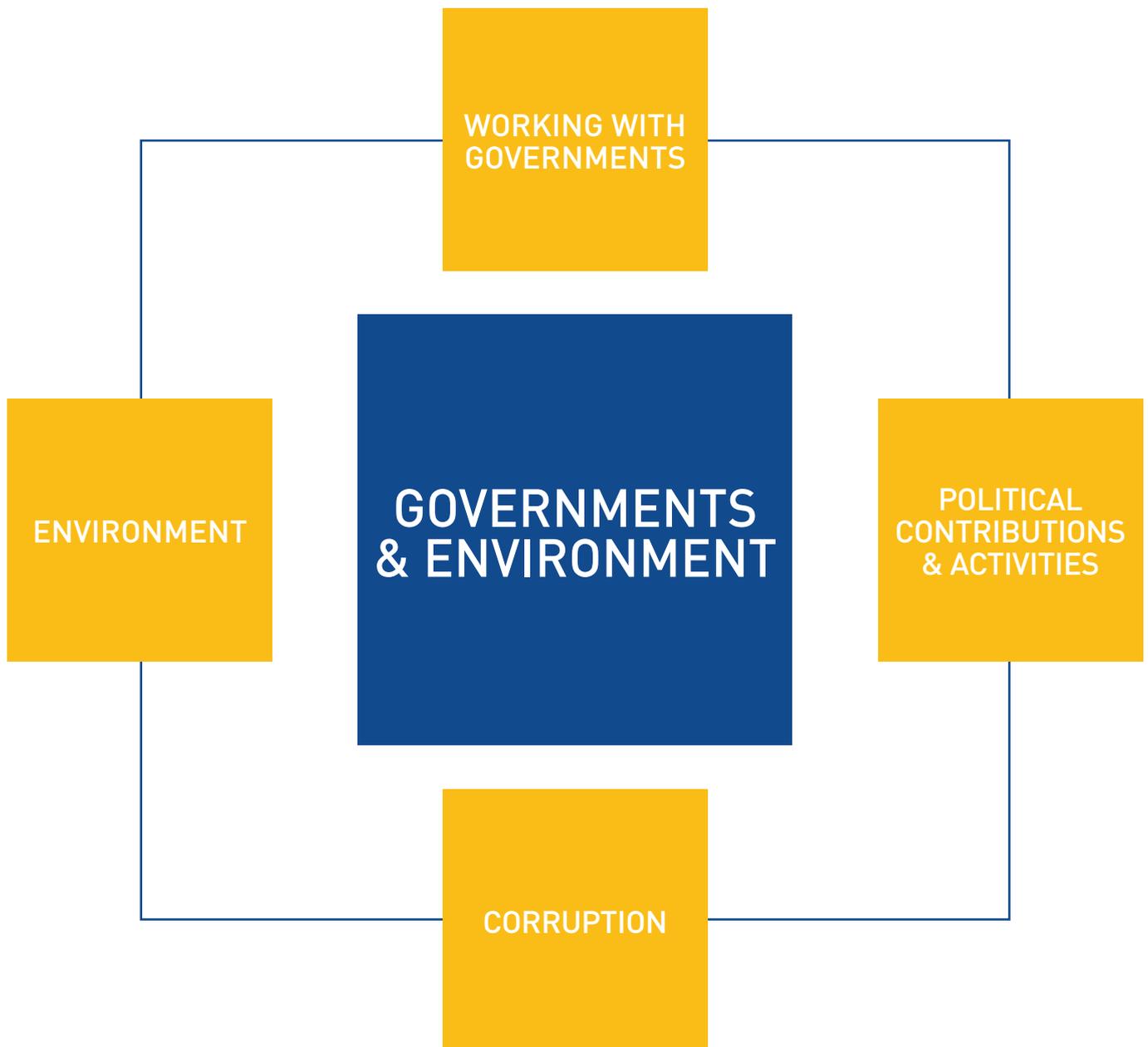
You must protect IP in the same careful way that other MaxiTRANS property is protected and never disclose MaxiTRANS IP that is confidential. This expectation applies throughout your employment and continues after your employment ends. On occasion, you may need to share our IP with persons outside of MaxiTRANS to allow a third party to work effectively with us. Even when there seems to be a legitimate reason to do so, you should never disclose this information without your supervisor or manager's prior approval and then only under a written confidentiality agreement.

Make sure you:

- Regard the information obtained by participating in the development of processes or products for MaxiTRANS, or the results of such work, as the property of MaxiTRANS, both during and after your period of employment with MaxiTRANS.
- Inform MaxiTRANS of the results of all work done during or outside of working hours that relate to the Company. MaxiTRANS is entitled to the exclusive benefits of any patents, copyright and other IP resulting from this work.
- Check that there are no third party IP rights that may prevent the deployment of new designs, brands technologies or processes.

You must not:

- Load any unlicensed software on any MaxiTRANS system or device.
- Accept or use anyone else's confidential information, except under an appropriate agreement.
- Bring to MaxiTRANS any confidential information, including computer records, from prior employers or clients.
- Use copyrighted materials or third-party trademarks (for example, portions of audio, video and off-the-internet or off-the-air recordings) in materials you are producing, including internet or intranet sites, without permission from the copyright or trademark owner.





WORKING WITH GOVERNMENTS

MaxiTRANS respects the authority of governments wherever we conduct business.

We will maintain honest relationships with governments and their agencies, officials and personnel. Our ability to conduct business is directly affected by government decision-making, and it is important we have open and constructive relationships with governments. MaxiTRANS may share information and opinions with governments on issues that affect our operations and our industry generally. Such exchange of information may be essential to enable informed decision-making by both governments and MaxiTRANS.

MAXITRANS EXPECTS YOU TO

If you provide information to governments on behalf of MaxiTRANS, you must ensure that all information is accurate and appropriate for the purpose. Errors or omissions may damage MaxiTRANS' reputation and could be illegal. If you are required to make representations on behalf of MaxiTRANS on government matters and with government officials, you must comply with all applicable laws and regulations and ensure you have the authority to disclose the information.

Make sure you:

- Be truthful, accurate, cooperative and courteous when dealing with government officials.
- Consider potential corruption risks when dealing with government officials.
- Stand firm against possible corruption.
- Consult with MaxiTRANS' Legal Counsel prior to the release of any information to government or government officials.

You must not:

- Authorise, offer, give or promise anything of value directly or indirectly to a government official to influence official action.
- Attempt to obstruct the lawful collection of information, data, testimony or records by appropriately authorised government or regulatory officials or hinder the lawful and proper provision of such information by another employee.
- Take action against anyone who lawfully and properly cooperates with government agencies.
- Accept information about a government's competitive selection of a supplier or competitor's bid or proposal (unless the government has specifically and lawfully authorised the release of the information).



POLITICAL CONTRIBUTIONS & ACTIVITIES

MaxiTRANS' approach to corporate participation in political activities is straightforward and applies internationally: we will not make political contributions in cash or in-kind.

We do not contribute funds to any political party, politician, elected official or candidate for public office in any country. It is acceptable for an authorised MaxiTRANS representative to express MaxiTRANS views to governments on subjects that affect the Company's interests and operations.

MAXITRANS EXPECTS YOU TO

Employees may participate as an individual in political processes provided it is understood, and made clear, that in doing so you are not representing MaxiTRANS. We recognise employees' rights and respect their choices to participate as individuals in the political process. You will need to apply for leave if you are running for office or carrying out the duties of public office during normal working hours. Such participation, including contributions of time and money, must be conducted entirely on your own time and your political opinions must not be presented as being those of MaxiTRANS.

Make sure you:

- Conduct business dealings on behalf of MaxiTRANS with any political party, politician, elected official or candidate for public office in any country in accordance with the Code and all applicable laws and regulations relating to anti-corruption and corporate participation in public affairs.

- Seek appropriate approvals for involvement in any business-related event or activity organised by or on behalf of a political party or candidate and be transparent when undertaking such activities.
- Be mindful of MaxiTRANS' reputation and how the public would perceive your actions when engaging with government officials.
- Make it clear that you are speaking on your own behalf and not on behalf of MaxiTRANS.

You must not:

- Make a cash or in-kind contributions or incur expenditure using a MaxiTRANS account for any political campaign, political party, political candidate, elected official or any of their affiliated organisations.
- Use or allow others to use any MaxiTRANS assets or resources for any political campaign, political party, political candidate, elected official or any of their affiliated organisations.
- Use charitable donations as a substitute for a political payment.
- Use your position in MaxiTRANS to try to influence another person to make political contributions or provide support to any political party or politician.



CORRUPTION

Compliance with anti-corruption laws is essential to protect MaxiTRANS' business reputation.

Corruption is incompatible with the ethics and Values of MaxiTRANS. The violation of anti - corruption laws is punishable by substantial fines for companies and possible prison sentences for individuals.

In keeping with local and international anti-corruption laws, we prohibit authorising, offering, giving or promising anything of value directly or indirectly (via a third party) to a government official to influence official action, or to anyone to encourage them to perform their work disloyally or otherwise improperly. We must also take care that third parties acting on our behalf do not violate anti-corruption laws, since this may result in a criminal liability for MaxiTRANS.

MAXITRANS EXPECTS YOU TO

Ensure you read and understand your obligations under anti-corruption requirements. MaxiTRANS policies and procedures require approval before offering any items of value to an external person who will interact with others on our behalf offering to provide a community donation or sponsor a community project.

Make sure you:

- Obtain prior authorisation from the MaxiTRANS Managing Director before offering, promising or giving anything of value. This includes but is not limited to sponsorships, community donations and community development projects.
- Obtain pre-approval as required before engaging business partners and conduct due diligence as directed.
- Ensure all expenditures are recorded in line with MaxiTRANS' reporting processes.
- Immediately report any corruption concerns to your supervisor/manager/ FairCall so that appropriate action can be taken.
- In case of any doubt in the area of corruption seek advice before committing anything from MaxiTRANS Legal Counsel.

You must not:

- Authorise, undertake or participate in schemes, which give an improper benefit, kickback or secret commission to anyone.
- Offer, promise or give cash or cash equivalent payment of any kind to a government official, unless prior authorisation is received.
- Establish a hidden or incorrectly recorded fund for prohibited payments.
- Personally pay for a gift, hospitality or other item of value in order to avoid complying with MaxiTRANS' policies and procedures and Values.



ENGAGING WITH COMMUNITIES

Our ability to build relationships and work collaboratively and transparently with our communities is critical to our long-term success. MaxiTRANS aims to be valued and respected by the communities in which we operate.

We build relationships with our communities by engaging regularly, openly and honestly with people affected by our operations and by taking their views and concerns into account in our decision-making. We understand that our business can impact local communities both positively and negatively, either through our own activities or as a result of our business relationships with other parties. We seek to work with relevant stakeholders to identify and address concerns and expectations and to maximise potential opportunities from our Company.

MAXITRANS EXPECTS YOU TO

If you are responsible for community donations, you need to read and understand the company's policy. This includes the conduct of appropriate due diligence before engaging any partner or agency, this will ensure the organisation is reputable, aligned with the Code and has appropriate governance processes.

Make sure you:

- Respect the cultures and varying business customs of the communities and countries in which we operate, providing they do not conflict with the Code or the law.
- Seek to identify and consider the concerns and expectations of all stakeholders, especially those most affected by our operations and take their views into account in decision-making.
- Investigate concerns, complaints, and report outcomes back to relevant stakeholders.

You must not:

- Offer, promise or participate in a community development project or donation to inappropriately influence anyone, including a government official.
- Intentionally favour individuals from one political, religious or ethnic group because of their membership of that group.
- Contribute to any religious organisation for religious purposes on behalf of MaxiTRANS.
- Provide a financial contribution to an individual/group of individuals.



MaxiTRANS will at all times seek to be environmental-friendly in all its business and workplace activities.

Our approach to environmental management is based on the identification, assessment and control of risks. We aim to minimise our affect on the environment by controlling our consumption of items and goods and by decreasing and where possible recycling our waste items.

MAXITRANS EXPECTS YOU TO

You must understand the potential environmental impacts of the tasks you perform and look at ways you can avoid and minimise environmental impacts. Where actual or potential environmental incidents are identified you must report these, irrespective of severity. If you have a suggestion as to how MaxiTRANS can improve its environmental commitments and contribution please discuss them with your supervisor or manager.

Make sure you:

- Identify, assess and take steps to minimise environmental impacts associated with your work.
- Immediately stop any work that may contribute to a significant environmental or incident.
- Report to your supervisor or manager any actual or potential impact to the environment from an accident, incident, spill or release of material so that appropriate action can be taken to prevent, correct and/or control those conditions.

You must not:

- Ignore a potential or actual environmental incident or assume that someone else will report it.
- Undertake a task that has the potential to impact on the environment unless you are trained and competent to do so and controls are in place to minimise environmental impacts.