



HAWSONS IRON CODE OF CONDUCT

It is Company policy that Hawsons Iron Limited (“Hawsons Iron”) conducts its activities with honesty, integrity and high ethical standards. For Hawsons Iron to conduct its activities with honesty, integrity and high ethical standards, it must have a board, management and employees and agents who are committed to such standards.

The purpose of this Code of Conduct is to provide guidelines as to what behaviour the Company expects of its directors and employees. It applies to all Hawsons Iron directors and employees.

For the purposes of this Code, the term “employees” will include contractors and consultants engaged by Hawsons Iron.

These are the standards of behaviour required by Hawsons Iron:

- **Honesty and Integrity**

People representing or working for Hawsons Iron carry out their duties honestly and in a manner which is professional, fair and ethical.

- **Compliance with Applicable Laws**

As a minimum, Hawsons Iron carries out its activities, and people representing or working for Hawsons Iron carry out their activities, in compliance with all laws applicable to those activities (in whichever jurisdiction that applies).

- **Compliance with Contracts**

Hawsons Iron honours its contractual commitments.

- **Business Expenses**

Travel, entertainment and other business expenses are incurred in a reasonable and financially responsible manner.

- **Confidential Information and Intellectual Property**

Hawsons Iron’s confidential technical, financial and commercial information is not divulged to others except to comply with the law or as required for the purpose of Hawsons Iron’ business. All employees who supply services to Hawsons Iron must meet these standards.

Furthermore, intellectual property created for Hawsons Iron in the course of work for the Company, including by contractors, belongs to Hawsons Iron. All contracts for the supply of services, where intellectual property may be created, must stipulate this ownership requirement.

- **Gifts**

Gifts, personal services, discounts or other gratuities may not be given to or accepted from Hawsons Iron' business associates or government officials.

- **Insider Trading**

Hawsons Iron's directors and employees must not engage in insider trading of Hawsons Iron shares or shares of any other company.

- **Conflicts of Interest**

Hawsons Iron's directors and employees should avoid situations where their private or non-Hawsons Iron interests conflict with the interests of Hawsons Iron in what they are doing or deciding for Hawsons Iron.

- **Community Standards**

Hawsons Iron aims to conduct its business in a way that reflects the applicable community standards. In order to achieve this, it has adopted policies which describe the principles which guide Hawsons Iron' business in such areas as:-

- Safety for its employees
- Environmental protection