

Corporate Code of Conduct

2011

TABLE OF CONTENTS

1. INTRODUCTION	3
2. SAFETY	3
3. COMPLIANCE WITH THE LAW	3
4. EQUITY AT WORK	4
5. HARASSMENT AND BULLYING	4
6. FRAUD AND CORRUPTION	4
7. WHISTLEBLOWER PROTECTION PROGRAM	4
8. CONFIDENTIALITY	5
9. CONFLICTS OF INTEREST	5
10. GIFTS FROM THIRD PARTIES	5
11. OTHER EXPECTATIONS	6
12. GENERAL	6
13. OWNERSHIP	6
14. REVIEW	6

1. INTRODUCTION

This is the Corporate Code of Conduct (“Code”) for Site Group International Limited and its subsidiaries (“Site Group International”) that sets out the standards of behaviour that each director, employee and inducted individual contractor of Site Group International (“you”) is expected to abide by in all dealings related to Site Group International.

You are expected to be familiar with and abide by this Code. To act in a manner contrary to the Code is to engage in behaviour that is considered unethical or unacceptable conduct. Site Group International’s Corporate Code of Conduct provides the ethical and behavioural framework within which we conduct the business of Site Group International every day.

Conducting business with personal and professional integrity creates loyalty and trust in employees, customers, the communities in which Site Group International operates, its shareholders, regulators and other stakeholders. It is the foundation upon which Site Group International’s reputation is based.

You are expected to:

- have the safety of yourself and those around you at the forefront of your mind at all times
- be loyal to Site Group International
- to fully understand the laws affecting your duties
- to display integrity in your dealings with others
- to preserve the confidentiality of information
- to conduct Site Group International’s business in accordance with the law and principles of good business practice.

On a day to day basis, this means you are expected to undertake your duties safely and conscientiously and to exercise your authority with honesty, integrity, care, skill and diligence.

2. SAFETY

Site Group International is committed to a safety target of zero harm. The goal of an injury-free workplace means your safety is first priority. There is an expectation that Site Group International will promote and deliver on safe work practices. The expectation of you is that you will come to work fit for duty, work safely at all times, report hazards and challenge anyone who may be putting themselves or others at risk. The standards you walk past are the standards you accept and at Site Group International, there is no tolerance for any behaviour or culture that compromises safety.

3. COMPLIANCE WITH THE LAW

In fulfilling your duties for Site Group International, you are expected to understand and comply with the letter and the spirit of all applicable laws and regulations. If you are unclear of the impact that the law may have on your role, you should seek advice from the Company Secretary, who may in turn obtain legal advice on the interpretation of the applicable laws and regulations.

To assist in identifying and understanding some of the more common laws and regulations that apply to the business of Site Group International, about which you are expected to be familiar and to comply with, Site Group International has in place written policies to address the manner in which compliance with the relevant law is to be achieved. As many of those policies are detailed in their scope, a summary of key policies is available to all employees and individual contractors having authorised access to Site Group International’s intranet site.

The Key Policies Snapshot is included in staff induction packs, is available on Site Group International’s intranet site and can be requested in hard copy from the Company Secretary.

4. EQUITY AT WORK

Site Group International is an Equal Employment Opportunity employer. All employees are treated on their merit, without regard to race, age, sex, marital status or any other factor not applicable to the position. Employees are valued according to how well they perform their duties, and their ability and enthusiasm to maintain our standards of service. Site Group International considers discrimination as an unacceptable form of behaviour and will not tolerate any form of discrimination. We believe all employees have the right to work in an environment free of discrimination.

5. HARASSMENT AND BULLYING

Site Group International is committed to ensuring a healthy and safe workplace that is free from workplace harassment and bullying. Workplace harassment is unacceptable and will not be tolerated under any circumstances.

Harassment and bullying is any uninvited, unwelcome behaviour or conduct that may offend, humiliate or intimidate. Harassment and bullying may be intentional or unintentional and might be one or a number of incidents.

Site Group International considers sexual harassment an unacceptable form of behaviour that will not be tolerated under any circumstances. We believe all employees have the right to work in an environment free of sexual harassment.

Sexual harassment is any unwelcome conduct of a sexual nature where a reasonable person would have anticipated that conduct would be offensive, humiliating or intimidating. Sexual harassment can be a single incident or a series of inappropriate actions. Some actions or remarks constitute sexual harassment in themselves, even if they are not repeated.

Site Group International requires that employees not tolerate sexual harassment, workplace harassment, bullying or any other form of unacceptable or discriminatory behaviour and to report any such incidences to your immediate supervisor.

6. FRAUD AND CORRUPTION

Site Group International operates with a zero tolerance of fraud and corruption. Site Group International is committed to encouraging a culture of openness, honesty and accountability in all who make Site Group International successful.

Site Group International's commitment to a culture of corporate compliance and ethical behaviour is seen as a benefit to everyone who has contact with the company including its directors, employees (whether permanent, part-time, casual or contracted) shareholders and customers. All matters raised by any person will be taken seriously and properly investigated. All employees about whom a suspicion of fraud or corruption has been raised will be treated equally regardless of their position or years of service with Site Group International. Determination in responding to these suspicions will be made based on findings of fact, actual or potential damage to Site Group International, co-operation by those employees and legal requirements.

The rights of employees who, in good faith, raise concerns regarding a suspicion of fraud or corruption will be protected.

7. WHISTLEBLOWER PROTECTION PROGRAM

Site Group International recognises that achieving a culture of openness, honesty and accountability will be assisted by an effective whistleblower protection program to encourage you, as well as external parties, to

bring to the attention of management any conduct that is unethical, dishonest, fraudulent, corrupt, illegal or otherwise unacceptable.

The Whistleblower Protection Program provides a confidential and secure process for anonymous reporting of such conduct without being discriminated against, victimized or harassed. The Whistleblower Protection Program is designed to:

- encourage the reporting of conduct by individuals if they genuinely believe a person has breached Site Group International's Corporate Code of Conduct, policies, the law or engaged in conduct that is unethical, dishonest, fraudulent, corrupt or otherwise unacceptable
- demonstrate Site Group International's commitment to a fair workplace and outline the process for managing conduct that is reported
- protect individuals who, in good faith, report such conduct on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment.

More information regarding the Whistleblower Protection Program and how individuals can make a report is set out in the Fraud and Corruption and Whistleblower Procedures available on Site Group International's intranet site and on request from the Company Secretary.

8. CONFIDENTIALITY

Confidentiality is a key characteristic of an efficient and successful business. You are required to protect proprietary, commercial and other information that is confidential to Site Group International. These obligations of confidentiality arise automatically once you become an employee of Site Group International, and continue after your employment has ceased with Site Group International.

Information that is not generally available to the public concerning the activities, results, strategies or plans of Site Group International must be used for authorised purposes only. Confidential information should be handled and communicated with care and must not be disclosed outside Site Group International without proper authority.

9. CONFLICTS OF INTEREST

You should not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between your personal interests and the performance of your duties in the interests of Site Group International. Such circumstances could compromise or appear to compromise your ability to make impartial business decisions. Any conflict of interest or potential conflict of interest that you have must be disclosed to your immediate manager/supervisor or to the Company Secretary.

10. GIFTS FROM THIRD PARTIES

From time to time employees of Site Group International may be offered gifts or other benefits including gratuities, entertainment, reciprocal hospitality and discounts in the course of carrying out their duties. Gifts and other benefits of any kind should not be accepted either directly or on behalf of any related person or entity where the acceptance of the benefit might influence, or appear to influence, the judgement or performance of a person's duties to Site Group International.

Employees involved in procurement activities may not accept gifts and other benefits from suppliers or potential suppliers while they are planning for or conducting procurement activities which involve or may involve those suppliers.

Small gifts (gifts which are not seen or perceived as an inducement to compromise or influence usual business procedure) or invitations to local social or sporting functions are generally acceptable. Accepted gifts and invitations, other than those considered as small gifts or local invitations noted above, are to be recorded in the Gift Register. Employees will only have visibility of gifts they have recorded in the Gift

Register. The Company Secretary will have overall visibility of the Gift Register.

11. OTHER EXPECTATIONS

You must also:

- work collaboratively within the bounds of commercial confidentiality
- not make unauthorised public statements
- treat fellow employees, customers, suppliers, shareholders, regulators and the community with respect and honesty
- represent Site Group International professionally and constructively in internal and external interactions.

12. GENERAL

To assist you to understand your obligations under the Code, you will have opportunities from time to time to attend refresher training on the Code.

You are encouraged to ask any questions you may have in relation to the Code or to report any difficulties or challenges encountered in complying with the Code (including any inconsistencies between the Code and the business initiatives of Site Group International) to the Company Secretary.

13. OWNERSHIP

The Company Secretary is accountable for the development and implementation of this Code.

14. REVIEW

Your feedback will assist in the evaluation of the effectiveness of the Code and will highlight any areas of the Code that may require amendment or additional guidance. This Code will be reviewed and amended by or on behalf of the Company Secretary at intervals deemed appropriate by Site Group International, but at least annually.