

OUR PRIVACY PRINCIPLES

Enthalpy will provide disclosure statements which comply with the National Privacy Principles that outline how information about applicants will be collected, used, disclosed and retained.

Enthalpy has developed such a statement. A long form version is also available (see Section 15. Privacy). This should be provided to candidates at interview to obtain their consent to collect personal and / or sensitive information during the selection process

1.0 PRIVACY

1.1 CLIENT INFORMATION – COLLECTION, STORAGE & HANDLING

At no time should Enthalpy or its personnel engage in the collection or storage of personally sensitive information of our clients in a way that would allow the client to be identified. Employee records are defined to include information about engagement, training, discipline or resignation of personnel, the terms and conditions of personnel's engagement, and personnel's performance or conduct.

Such information should not be released to any external person or organisation without the authority of the person concerned. Exceptions will be necessary in cases where the information is sought by a police officer acting in the course of his / her duties, where the information is obtained under subpoena or where a requesting authority has a statutory entitlement to be supplied with such information upon request. e.g. Centrelink.

CODE OF ETHICS POLICY

It is the company's policy to manage and operate worldwide business activities in conformity with applicable laws and high ethical standards. Both the Board of Directors and management are determined to comply fully with the law, and to maintain the company's reputation for integrity and fairness in business dealings with others.

SCOPE

This policy applies to all employees, associates, officers and directors at all company locations.

RESPONSIBILITY

All employees, associates officers and directors are expected to adhere to all ethical and legal standards as outlined in this policy and to preserve the company's integrity and reputation.

PROVISIONS

1. FINANCIAL RECORD-KEEPING

It is the policy of the company to fully and fairly disclose the financial condition of the company in compliance with the applicable accounting principles, laws, rules and regulations. Honest and accurate recording and reporting of information is critical to our ability to make responsible business decisions. The company's accounting records are relied upon to produce reports for the company's management, investors, creditors, governmental agencies and others. All employees and associates have a responsibility to ensure that the company's accounting records do not contain any false or misleading entries.

We do not permit intentional misclassification of transactions as to accounts, departments or accounting periods. In particular we require that all transactions are supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period.

2. IMPROPER PAYMENTS

No payment or transfer of company funds or assets shall be made that is not authorised, properly accounted for and clearly identified on the company's books. Payment or transfer of the company's funds and assets are to be used only as specified in the supporting documents.

No employee, officer or director may authorise any payment or use any funds or assets for a bribe, "kickback," or similar payment that is directly or indirectly for the benefit of any individual (including any government official, agent or employee anywhere in the world), company or organisation in Australia or any foreign country, and which is designed to secure favourable treatment for the company. Under Australian federal legislation it is a felony to make payments of this kind to foreign government officials.

3. POLITICAL CONTRIBUTIONS

It is the company's policy not to contribute any company funds or assets to any political party, committee, organisation, or candidate for any office (federal, state or local) in Australia or any foreign country.

4. ACCEPTANCE OF PAYMENTS

Employees, associates, officers and directors may not seek or accept, either directly or indirectly, any payments, fees, services, or other gratuities (irrespective of size or amount) outside the normal course of the employee's business duties from any other person, company or organization that does or seeks to do business with the company. Gifts of cash or cash equivalents of any amount are strictly prohibited. The receipt of common courtesies, sales promotion items of nominal value, occasional meals, and reasonable entertainment appropriate to a business relationship and associated with business discussions are permissible.

5. BUSINESS ENTERTAINMENT

All solicitations or dealings with suppliers, customers, or others doing or seeking to do business with the company shall be conducted solely on a basis that reflects both the company's best business interests and its high ethical standards. The company does permit the providing of common courtesies, entertainment, and occasional meals for potential or actual suppliers, customers or others involved with the company's business, in a manner appropriate to the company's relationship and associated with business discussions. Expenses in this connection must be reasonable, customary and properly authorised.

6. CONFLICTS OF INTEREST

The company expects all employees, associates, officers and directors to exercise good judgment and the highest ethical standards in private activities outside the company that in any way can affect the company. They shall at all times exercise particular care that no detriment to the interest of the company may result from a conflict between those interests and any personal or business interests which the individual may have.

7. COMPLIANCE WITH LAWS AND REGULATIONS

The company requires its employees, officers and directors to comply with all applicable laws and regulations in countries where the company does business. Violation of domestic or foreign laws and regulations may subject an individual, as well as the company, to civil and/or criminal penalties. Employees have an obligation to comply with all laws and regulations and policies and procedures and to promptly alert management of any deviation from them.

(a) Antitrust Laws

It is the company's policy to comply with the letter and spirit of all applicable antitrust laws. If the legality of any contemplated transaction, agreement or arrangement is in doubt, employees, officers and directors must consult with a company staff attorney.

Discussions with competitors regarding the company's prices, credit terms, terms and conditions of sale, strategies or other confidential, sensitive or proprietary information are not permissible. This applies both to individual discussions and to participation in trade and professional associations and other business organisations.

(b) Insider Trading

No employee, associate, officer or director may trade in securities while in possession of material inside information or disclose material inside information to third parties ("tipping"). Material inside information is any information that has not reached the general marketplace through a press release, earnings release or otherwise, and is likely to be considered important by investors deciding whether to trade (e.g., earnings estimates, significant business investments, mergers, acquisitions, dispositions and other developments, expansion or curtailment of operations, and other activity of significance). Using material inside information for trading, or tipping others to trade, is both unethical and illegal. Accordingly, no employee, associate, officer or director of the company may:

- (i) trade in any company securities while in possession of material inside information with respect to that company;
- (ii) recommend or suggest that anyone else buy, sell, or hold securities of any company while the employee or associate is in possession of material inside information with respect to that company (this includes formal or informal advice given to family, household members and friends); and
- (iii) disclose material inside information to anyone, other than those persons who need to know such information in order for the Company to properly and effectively carry out its business.

8. FAIR DEALING

Each employee, officer and director should endeavour to deal fairly with the company's suppliers, competitors and employees. No one should take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Information about the company's competitors must be used in an ethical manner and in compliance with the law. Under no circumstance should information be obtained through theft, illegal entry, blackmail, or electronic eavesdropping, or through employees misrepresenting their affiliation with the company or their identity. Any proprietary or non-public information about the company's competitors should not be used if it is suspected that such information has been obtained improperly.

9. DUTY TO REPORT VIOLATIONS

Each employee, associate, officer and director is responsible for promptly reporting to the Company any circumstances that such person believes in good faith may constitute a violation of this policy. Except as provided in the next paragraph, suspected policy violations are to be reported (including confidential and anonymous reports) to the Company's General Counsel and its Chief Audit Executive.

No retribution against any individual who reports violations of this Policy in good faith will be permitted. However, the reporting of a violation will not excuse the violation itself. The company will investigate any matter that is reported and will take any appropriate corrective action.

10. VIOLATIONS OF POLICY

Violations of any of the foregoing provisions may expose the company and the individuals involved to lawsuits and possible criminal action.