

## HAMILTON JAMES & BRUCE GROUP LIMITED Code of Conduct

### 1. INTRODUCTION

Hamilton James & Bruce Group Limited (**HJB** or the **Company**) aims to maintain the highest ethical business behaviours in all our dealings with clients and candidates, suppliers and with each other. This Code of Conduct sets the standards of behaviour expected of all HJB employees, including Directors.

### 2. OUR VALUES

Our values determine how we interact with our colleagues, clients, candidates and suppliers. We hire in line with these values, and they are:

- We before me
- Go the extra mile
- Be courageous
- Do the right thing
- Genuine care

### 3. COMPLIANCE WITH THE LAW

HJB operates within a legal framework, and we have an obligation not to breach the laws of the country in which we are operating. If we become aware of a breach of the law, or potential breach, this will be reported to the Company Secretary. We may seek advice from the Company Secretary if we are unsure of the laws relating to our work practices and environment. The Company Secretary will investigate all complaints and report to the Board and recommend action as required.

### 4. HONESTY AND INTEGRITY

We will, at all times, act with honesty and integrity towards our fellow workers, our clients and candidates, and other businesses and people with whom we interact.

### 5. OUR STAKEHOLDERS

We acknowledge that as employees we will endeavour to deliver value not only to our shareholders but also provide a commitment to quality service to our clients, candidates and the broader community.

### 6. PROPERTY USE OF POSITION AND PURPOSE

We shall not make improper use of information or seek improper advantage through our position at HJB.

### 7. PRIVACY AND CONFIDENTIALITY

During the course of our duties we may learn confidential information about HJB, our client and candidates and/or our suppliers. We must not disclose confidential information without the permission of the owner of that information. We shall at all times comply with Company policy in relation to the collection, use and disclosure of personal information in relation to our candidates.

## 8. VALUING OUR PEOPLE

We will treat all our employees equally. We will not engage in or permit unlawful discrimination or harassment in our workplace.

## 9. QUALITY AND THE HJB WAY

It is our goal to deliver a service to our candidates and clients that is of the highest standard. This will embrace our policies, procedures and processes of continuous improvement and our commitment to the HJB Way and ISO 9002.

## 10. BRIBERY AND CORRUPTION

10.1 HJB prohibits bribery and corruption in all its business dealings. Bribery involves making a payment of any value to any person deliberately to distort a proper decision-making process, to influence a person's decision, to encourage them to secure an improper commercial advantage, or to enter into a dishonest arrangement.

10.2 Australia has laws prohibiting bribery. A breach of these laws is a serious offence which can result in fines on the Company and employees and imprisonment of employees. Even the appearance of a breach of these laws can have a serious affect on the reputation of HJB.

10.3 HJB discourages the making of facilitation payments, which are payments involving small sums to low-level government officials to obtain routine services to which HJB is otherwise legally entitled.

## 11. CONFLICTS OF INTEREST

There may be times when our personal interest conflicts with those of the organization and this can affect our ability to make decisions impartially. In these circumstances we must take action to remove or manage the conflict. Where we have any doubts, these must be referred to our Chief Executive Officer.

## 12. SECURITIES TRADING

If you have information about HJB, or any other company, that is not in the public domain and is price sensitive, then you cannot trade in that company's securities or pass the information onto another person. If ever in doubt this must be referred to the Company Secretary. For further details on HJB's securities trading policy please see HJB's *Dealing with Securities Policy and Guidelines* issued on August 2008, or later, which is available on HJB's website.

## 13. COMPLIANCE WITH THIS CODE OF CONDUCT

HJB is committed to promoting and maintaining the ethical standards set down in our Code of Conduct. We encourage all employees to report promptly in good faith any serious violation of this Code of Conduct. All reports will be investigated and appropriate action taken.

**ISSUED DATE:** August 2009

**LAST UPDATED:** January 2010

**VERSION NO:** Version 3

**APPROVED BY:** Chief Executive Officer and Managing Director  
Hamilton James & Bruce Group Limited