

EMPLOYEE CODE OF CONDUCT

Fleetwood Limited (**Fleetwood**) is committed to maintaining the highest standard of conduct and ethics. This Code of Conduct policy reflects the business practices and principles of behaviour that support this commitment.

The Code of Conduct cannot describe every practice or principle relating to honest and ethical conduct, however the Code of Conduct addresses conduct that is particularly important to proper dealings with the people and entities. Employees should never hesitate to ask questions in relation to potential violations of the Code of Conduct and report suspected violations/breaches without fear of any form of retaliation as listed below or outlined within the Performance Management Policy.

As outlined in Fleetwood's 'Delivering the Promise', people when conducting business and dealing with customers, colleagues and other stakeholders are to:

- (a) Act with integrity, professionalism and be scrupulous in the use of company information, funds, equipment and facilities
- (b) Exercise fairness, equity, courtesy, consideration and sensitivity in dealing with customers, employees and other stakeholders
- (c) Avoid real or apparent conflict of interests
- (d) Promote the interests of the company
- (e) Perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner
- (f) Abide by policies and procedures, instructions and lawful directions that relate to their employment and duties
- (g) Comply with the spirit as well as the letter of the code of conduct.

Equal Opportunity

Fleetwood is an equal opportunity employer. Fleetwood does not tolerate discrimination against applicants or employees based on race, colour, religion, sex, age, marital status, national origin, sexual orientation, citizenship status or disability. Fleetwood is committed to providing a work environment that is free from discrimination or harassment of any type. Refer to Equal Opportunity Policy HRM-2.5 for further detail.

Health and Safety

Fleetwood strives to provide a safe working environment. It is expected that employees follow safety and health rules and practices and promptly report accidents, injuries and unsafe equipment and conditions. Refer to Health and Safety Policy for further detail.

Conflict of Interest

Employees must avoid personal, financial or other interest, which may be in conflict with their duties and responsibilities to the company. Any interest that may constitute a conflict of interest must be promptly disclosed to an appropriate Supervisor/manager.

Accepting any external appointment, such as a board appointment (other than to the board of a non-trading family company), working for another organisation, or conducting a business is not permitted without the written permission of the MD/Executive GM, or in the case of the MD of the Chairman.

Confidentiality

Information obtained in the course of employment must not be used or disclosed to obtain financial reward or benefit, or to take advantage of another person.

Privacy

Fleetwood strictly accords with the National Privacy Principles (NPP), which are contained in the Privacy Act 1988, and will only use personal information for the purposes to which it is provided to us. Personal information is generally provided through the recruitment, selection and appointment process. Fleetwood categorically will not give information about employees to any external bodies unless one of the following applies:

- The employee has consented;
- The employee expects Fleetwood to or has told the employee Fleetwood will;
- It is required or authorised by law.

For further information, relating to the Privacy Policy refer to Fleetwood's Privacy Policy.

Trading in Company Shares

Employees must ensure all transactions in company shares comply with the law. Employees must not buy or sell company shares while they possess market sensitive information and must consult the company secretary if unsure of the status of a contemplated sale or purchase.

Company Property

Company property, funds, facilities and services must be used only for authorised purposes. Unless governed by law or otherwise agreed in writing, any intellectual property developed by an employee during or as a result of employment with the company is the sole property of the company.

Public Statements

The company's relationships with the media and the investment community are conducted exclusively by the Chairman or the Managing Director, or as delegated by them.

Gifts and Entertainment

Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced or give rise to the perception that the transaction may be influenced by the gift. Under no circumstances must employees offer or accept money. Gifts, invitations involving travel and accommodation and entertainment reasonably estimated to be in excess of a value of \$150 must be disclosed to the manager for authorisation.

Compliance

Employees must be aware of, and adhere to, company policies, especially those relating to health and safety, equal opportunity, privacy, trade practices and continuous disclosure. In the course of their duties, employees must comply with relevant legislation.

Breaches to the Code of Conduct

Employees have a duty to observe the code and ensure that no breaches or violations occur. Employees have a duty to immediately report known or suspected breaches of the code.

Any employee, who in good faith, makes a complaint or disclosure about an alleged breach of the code, and follows the reporting procedure outlined below, will not be disadvantaged or prejudiced in the making of such a complaint or disclosure. All reports will be treated as confidential.

A complaint or disclosure should be in writing and contain details about the date, time and nature of the alleged breach and include any supporting material. The allegation should be made to the employee's immediate supervisor, or if the employee believes the immediate supervisor may be implicated, to a senior executive or to the Managing Director.

The employee will be informed of the outcome of any subsequent investigation. If unsatisfied with the outcome of the investigation, the employee may refer the matter to the Managing Director.

Conclusion

Fleetwood's reputation depends largely on employees taking personal responsibilities for maintaining and adhering to the policies as outlined in the Code of Conduct. If Fleetwood employees have any questions relating to the information documented in the Code of Conduct, please contact your leader or HR Manager/Advisor.