



ABN 99 080 135 913

HYPERION FLAGSHIP INVESTMENTS LIMITED

CODE OF CONDUCT POLICY

The Company recognises that the success of our business and the maintenance of the Company's integrity require that its Directors and officers pursue the highest standards of ethical conduct at all times.

We will act in accordance with the following principles:

1. FAIR DEALING

We will deal fairly with our employees, colleagues, customers, suppliers, competitors and shareholders and will maintain a high standard of responsibility and awareness as a corporate citizen.

2. AVOID CONFLICTS OF INTEREST

We acknowledge that there may be times when our personal or other interests conflict with those of the Company. In these circumstances, we will take action to remove or manage the conflict, so as to avoid detriment to the Company or any perception of conflict of interest.

3. PERSONAL TRANSACTIONS

We will not use the name of the Company for personal gain.

We will not use any information gained from our dealings with the Company for personal gain, nor allow any such information to be used for the personal gain of others.

Any equipment, services or facilities made available to us by the Company will only be used for properly authorised purposes.

4. MAINTAIN CONFIDENTIALITY

We will take care to ensure that confidential information about our business, shareholders, suppliers, and employees is properly protected and not disclosed, except for proper purposes or where required by law.



5. COMPLIANCE WITH THE LAW AND COMPANY POLICIES

We will abide by the law and relevant Company policies at all times, including best practice recommendations established in the ASX Corporate Governance Council Principles of Good Corporate Governance and Best Practice Recommendations.

6. REPORTING OF BREACHES ENCOURAGED

Any breaches of the law or unethical behaviour which becomes known to staff must be reported to the Managing Director. Breaches of the law which become known to a Director must be reported to the Chairperson or the Board as a whole.

Any breaches so reported will be properly investigated and appropriate action taken. Persons who report suspected breaches in good faith shall be protected from victimisation.