

Code of Conduct Policy

Aerometrex Ltd

ACN 153 103 925

Document

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Code of Conduct

1. Policy Introduction

It is Aerometrex's objective to appropriately balance, protect and enhance the interests of its stakeholders. Proper behaviour by Aerometrex's directors, officers, employees and those Aerometrex contractors that do work for it, is essential in achieving this objective.

This Code of Conduct:

- Sets out the standards of behaviour that apply to every aspect of Aerometrex's dealings and relationships, both inside and outside Aerometrex;
- Refers to policies, procedures and systems adopted by Aerometrex to assist and guide Aerometrex and its people to meet those standards;
- Applies to the directors, officers and employees and, where relevant and to the degree to which it is able, the contractors of the Aerometrex group of companies; and
- Meeting the standard means embracing, living and abiding to the Aerometrex culture and values and taking responsibility for conducting themselves in accordance with this Code in the context of their role in Aerometrex.

2. Standards of Behaviour

The following standards of behaviour apply:

- Comply with the laws that govern Aerometrex and its operations;
- Act honestly and with integrity and fairness in all dealings with others and each other;
- Avoid or manage conflicts of interest;
- Use Aerometrex's assets properly and efficiently for Aerometrex's benefit;
- Contribute to the wellbeing of Aerometrex's key stakeholders;
- Seek to be an exemplary corporate citizen.

2.1 Comply with the Laws that Govern Aerometrex and its Operations

- Aerometrex aims to act in a manner that complies with both the letter and the spirit of the law; and
- Directors, officers and employees need to be familiar with the duties and responsibilities applying to them under the laws relevant to Aerometrex and in the context of their role in Aerometrex.

Directors, officers and employees are encouraged to:

- Ask for clarification and assistance about the application and interpretation of any law; and
- Regularly update their knowledge of the law as it applies to their role with Aerometrex and undertake relevant training or professional development as necessary.

2.2 Act Honestly and with Integrity and Fairness in all Dealings

Aerometrex aims to operate with the highest standard of honesty, integrity, fairness and professionalism in its operations and its dealings with shareholders, employees, governments, suppliers, customers, indigenous communities, joint venture partners, the community and each other by:

- All directors, officers and employees will act in good faith in the context of their role in Aerometrex;
- Adopting business practices to avoid improper conduct such as bribery or corruption;

- Providing equality of employment opportunity;
- In all dealings people will be treated with respect and with dignity regardless of their differences;
- An individual's personal information will be protected under Aerometrex's Privacy Policy; and
- All directors, officers and employees will record and report information relating to their role in Aerometrex in an honest, accurate and timely way to ensure Aerometrex maintains current, accurate records to facilitate timely, balanced, accurate statutory reporting and disclosure and well-informed decision making in all areas of Aerometrex.

2.3 Avoid or Manage Conflicts of Interest

A conflict of interest arises when a person is tempted to prefer their own interests or the interests of others (such as relatives or friends) instead of the interests of Aerometrex. In other words, a conflict of interest may occur where loyalties are divided.

Directors, officers and employees should be familiar with Aerometrex's policy dealing with actual conflicts of interest and potential or perceived conflicts of interest.

2.4 Use Aerometrex's Assets Properly and Efficiently for Aerometrex's Benefit

Directors, officers and employees are to ensure that:

- Aerometrex's assets (such as information, equipment or funds) must be used properly and efficiently for Aerometrex's benefit to achieve its objectives and not for the advantage of others or to cause loss to Aerometrex.
- Directors, officers and employees will use their time effectively and efficiently in the context of their role in Aerometrex;
- All directors, officers and employees are subject to confidentiality arrangements aimed to protect the non-public information owned or used by Aerometrex.
- Directors, officers and employees should be familiar with Aerometrex's Securities Trading Policy, which ensures that sensitive company information is not used inappropriately in dealing with Aerometrex securities.

2.5 Wellbeing of its Key Stakeholders

Aerometrex through its Directors, officers and employees will:

- Strive for innovation and diligence amongst Aerometrex's people by:
 - Encouraging participation in professional development to benefit Aerometrex and the individual, and to enable its people to better fulfil their roles in Aerometrex. Aerometrex has policies to support this commitment;
 - Adopting principles aimed at attracting, retaining and rewarding employees who assist Aerometrex to achieve its objectives;
 - Encouraging a diverse workforce; and
 - Encouraging personal development for the benefit of both the individual and Aerometrex;
- Aim to be an employer of choice and to provide a family-friendly work environment;
- Have policies and practices in place to provide and maintain a healthy and safe workplace;
- Seek to deliver shareholder value and wealth
- Give due consideration to interests and concerns of its stakeholders; and
- Adopt strategies to keep shareholders and other key stakeholders informed about Aerometrex and its key developments.

2.6 Social, Economic and Environmental culture

Aerometrex is:

- Conscious of the need to consider ways to support the social, economic and environmental aspects of the communities in which it operates;
- Committed to conducting its operations in an environmentally and socially responsible manner; and
- Committed to constructive relations with indigenous communities and the communities in which it operates.

3. Compliance with this Code

Compliance with this Code requires genuine commitment and the cooperation of every person. This includes a responsibility for each person to report any breach or possible breach of this Code that a person becomes aware of. The type of breach or possible breach may range from dishonest behaviour, fraud, a breach of a law, improper conduct or an un-safe work practice.

A possible breach or breach of this Code should be reported to the Company Secretary, Managing Director or Chair of the Board. There are laws to ensure that a person who makes a report will not be personally disadvantaged. Aerometrex will endeavour to protect the privacy of the person making the report and keep the information reported in confidence so far as the issue reported allows. A person may choose to make a report anonymously.

Reports will be investigated. All directors, officers and employees are expected to assist in any investigation. The type of action taken in relation to any breach will be determined by the nature of the breach. Action could include counselling, disciplinary action, and where appropriate, termination of employment. In cases of misconduct or a breach that involves criminal activity a report will be made to the relevant authority.

Aerometrex has a Whistle-blower Policy under which suspected or actual breaches of this policy may also be reported.

If there are any questions or issues regarding this Code or Aerometrex's policies and procedures, the Company Secretary should be contacted.