

CODE OF CONDUCT

It is important that all Homeloans Ltd employees conduct themselves with honesty and integrity and practice the highest ethical standards in the interest of shareholders and other stakeholders. This framework provides an environment for all employees to excel regardless of race, religion, age, disability or gender.

This code of conduct is applicable to all directors, employees, contractors and consultants working with Homeloans Ltd.

Guiding Principles

1. Respect for others

- Act professionally, honestly and courteously in all dealings for the company.
- Refrain from making any disparaging or untruthful remarks about other employees, competitors or suppliers.
- Provide an equal opportunity environment for all employees and abstain from any discriminatory, harassing or bullying activities.

2. Honesty and integrity

- Report to relevant managers if possible conflicts of interest arise from outside business activities, relationships with suppliers, personal investments, or family activities.
- Refuse any commissions, fees or gifts that fall outside normal commercial business practice, or the bounds of socially acceptable behaviour.
- Avoid engaging in any practice that could be seen as bribery, fraud or unethical.

3. Diligence

- Avoid any practices or activities that will detrimentally affect the company.
- Carry out duties in a professional and conscientious manner and deliver exceptional product and service to customers.

4. Confidentiality of information

- Keep company information confidential except when disclosure is authorised.
- Respect the privacy of others.
- Not use the name of Homeloans Ltd and information obtained as an employee of Homeloans to further personal or other business transactions.
- Ensure that company assets and services are used in accordance with the terms on which they are provided and relinquish them when we leave the company.

5. Respect for the law and company policies

- Comply and adhere to all laws including insider trading laws and maintain all business records as legally required.
- Comply with all company policies and procedures.
- Report any matters that constitute misconduct, fraud, corruption, or unethical practices to managers or other persons who are responsible for investigating the matter.
- Co-operate with law enforcement agencies.

6. Health and safety

- Support and contribute to a safe and healthy working environment for all.

Conflict of Interest

Employees have the responsibility to work in the best interests of Homeloans Limited and avoid situations and actions that may be, or create the appearance of being, in conflict with the company's overall objectives and principles. The following are examples of activities that have the potential to cause conflict and should be avoided:

- The acceptance by an employee from any party or supplier of services, either directly or indirectly, of cash payments (other than reimbursements for reasonable out-of-pocket expenses), services, loans (except from banks or other financial institutions) or discounts (except those offered to all employees of the company);
- Holding a substantial financial interest in any company with whom we have business dealings (e.g. competitors, suppliers and customers);
- Accepting gifts from any business party involved with Homeloans Limited.

Problems arising through these situations can usually be avoided by conducting any business transactions in an ethical and honest manner. The following guidelines may assist in determining what is considered proper:

- Payment for an appropriate lunch or meal in connection with a business meeting, as long as they are kept on a reciprocal basis and maintain relevance to the business at hand;
- Advertising novelties, provided that they do not appreciate in value and are widely distributed to others under essentially the same business relationship with the donating party (e.g. give-aways such as pens, coasters, watches);
- Relationships with commercial customers where reciprocal gifts or dealings are exchanged without inference of unethical conduct. In certain countries local custom dictates exchange of gifts as a matter of courtesy.