

Effective date:	12 July 2005
Replaces:	
Recommended by:	General Manager Human Resources
Authorised by:	Board of Directors

## Code of Conduct

### 1. Purpose

Sigma requires the highest standards of integrity and conduct from all team members (Sigma employees, contractors engaged by Sigma or working on Sigma sites, casual and temporary staff) at all times. This Code of Conduct outlines the principles and behaviours required of Sigma team members to maintain and achieve these standards. Any breach of the Code of Conduct by team members may result in disciplinary action in line with Sigma's disciplinary procedures up to and including termination of employment.

Individuals who identify breaches of this Code of Conduct by other team members should report the breach to their immediate manager or Human Resources representative for investigation. (Refer Sigma's *Whistleblower Policy* and *Good Working Relationships Policy* on Victimisation.)

#### KEY PRINCIPLES

The key principles of the Sigma Code of Conduct are:

- Honest and ethical behaviour
- Respect for people and property
- Legal compliance

### 2. Honest and Ethical Behaviour

Sigma team members will conduct themselves with honesty and integrity. We will act in a professional manner that is consistent with Sigma values by:

- Not divulging confidential information about the organisation, its employees, customers or suppliers without proper authorisation;
- Minimising any conflict of interest by making full disclosure to Sigma where a potential or actual conflict of interest exists (including, but not limited to, supplementary employment; commission or fees received; or, receipt of material gifts or benefits) – (Refer Sigma's Conflict of Interest Self-Assessment);
- Not using Sigma time inappropriately for personal purposes;
- Reporting any knowledge of fraud, material error, breach of law, or of a concealed practice against the interest of Sigma (Adherence to Sigma's Legal Compliance Policy);
- Not using any company asset on an unauthorised basis for personal use or gain (including goods, money, equipment, corporate cards, intellectual property or the services of other areas of the organisation).

### 3. Respect for People and Property

Sigma team members will treat all stakeholders (Sigma team members, shareholders, customers, suppliers, the public and others on Sigma's behalf) courteously, fairly and without harassment or unlawful discrimination in any form. We will also maintain the organisation's property with respect and care. We will undertake this by:

- Treating all Sigma stakeholders with dignity, respect, professionalism, promptness and helpfulness;



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- Acknowledging and appreciating the diversity of our workforce and having regard for cultural and religious sensitivities;
- Complying with Sigma's Good Working Relationships policy covering Equal Opportunity and Anti Discrimination commitments;
- Not participating in any verbal, written or physical act in the workplace (including bullying, harassment or fighting) that offends, intimidates or endangers the safety of any other team member or person working on Sigma premises;
- Providing and maintaining a safe and healthy environment for our stakeholders – this includes our work environment and local community;
- Preventing damage to Sigma property or property owned by team members or customers. Theft of company property or goods will not be tolerated;
- Complying with all Sigma policies and procedures;
- Observing and complying with lawful and safe instructions of the organisation and persons with authority to issue instructions.

#### 4. Legal Compliance

Sigma team members will comply with all Federal, State and local laws and regulations, with particular regard for:

- a) Not participating in or allowing the organisation to become involved in any illegal activity or transaction (directly or indirectly);
- b) Not seeking or accepting any bribe, commission or procurement fee, or share commission with an agent or any other person in connection with a sale, purchase, or any other activity or transaction arising in the course of the business of the organisation, or concerning a service rendered by the organisation;
- c) Ensuring delegated authority limits are complied with;
- d) Ensuring that legislation governing insider trading and related issues is understood and followed by employees with share price sensitive information;
- e) Adherence to the *Therapeutic Goods Act, Regulations and Orders*, in particular the Code of Good Manufacturing Practice (GMP) and the Code of Good Laboratory Practice (GLP);
- f) Adherence to all Sigma Occupational Health & Safety Policies and Procedures.

#### 5. Breaches

Breaches of this policy may lead to disciplinary action being taken, including dismissal in serious cases.