

Employee Code of Conduct

Introduction

This code of conduct applies to employees of Fleetwood Corporation Limited and its subsidiaries.

Employees when conducting business and dealing with customers, colleagues and other stakeholders are to:

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

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 which may constitute a conflict of interest must be promptly disclosed to an appropriate senior 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 chief executive officer, or in the case of the chief executive officer 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.

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 chief executive, 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 of the code

Employees have a duty to observe the code and ensure that no breaches occur. Employees have a duty to 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 chief executive officer.

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 a senior executive or the chief executive officer.