


FIN	APPROVED BY/ISSUED DATE Chief Financial Officer 1 July 2011	 <p style="text-align: center;">Wesfarmers Industrial and Safety</p> <p style="text-align: center;">POLICIES & PROCEDURES</p>
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ETHICAL CONDUCT POLICY		

Wesfarmers Industrial & Safety (“WIS”) and its business units are committed to the highest standards of conduct and ethical behaviour in all of their business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

The Ethical Conduct Policy is to encourage suppliers, contractors, customers or any other party to **raise any concerns and report instances of unethical, illegal, fraudulent or undesirable conduct**, where there are reasonable grounds to suspect such conduct, **without fear of intimidation, disadvantage or reprisal**.

WIS relies on the parties that it does business with to help the company achieve its commitment to a culture of honest and ethical behaviour, corporate compliance and good corporate governance. For WIS, the failure to report actual or suspected incidents of Unethical Conduct will be treated seriously and may adversely affect the ongoing business relationship.

Unethical Conduct covered by this Policy includes any conduct of a director, officer, employee, contractor or third party, whether actual or suspected, including:

- dishonest, fraudulent, corrupt or illegal conducts;
- unethical actions or behaviours (including bribes, facilitation payments or other kick-backs, inappropriate gifts; falsifying documents or other unacceptable or unethical behaviour);
- actions that have the potential to damage WIS’ property, people or reputation or that of another party (such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources); or
- abuse of authority, threats, intimidation or harassment.

Unethical Conduct can be reported to:

- the employee’s immediate supervisor or manager or another senior person; or
- the Ethical Conduct email hotline on ethical.conduct@wisau.com.au and these matters will be confidentially referred to the WIS Managing Director or Chief Financial Officer.

While the person reporting the issues may wish to remain anonymous, if contact details are not provided, sufficient details will need to be included in the report to allow the matter to be investigated.

WIS will investigate all reports of Unethical Conduct in a timely, thorough, confidential, objective and fair manner (subject to considerations of the privacy of those against whom allegations are made).