

## SUMMARY OF CODE OF CONDUCT OF BGFC

BGFC's Code of Conduct (the "**Code**") is summarised as follows:

1. The Code applies to anyone who is employed by or works at BGFC, including employees, contractors, consultants, secondees and directors ("**you**"). This policy sets out the standards of ethical behavior the Company expects from its Directors, officers, employees, including temporary, contracted or seconded staff or officers.
2. If you breach this Code you may be subject to disciplinary action including termination of employment or any other service contract.
3. You must:
  - a. Act in the best interests of BGFC and with honesty, integrity and fairness.
  - b. Comply with the laws and regulations which apply to BGFC and its operations.
  - c. Comply with this Code and the other policies and procedures of BGFC.
  - d. Not knowingly participate in any illegal or unethical activity.
  - e. Immediately report any concern about a possible breach of the Code, or any other Reportable Matter, to your line manager or the CEO or the Executive Chairman.
  - f. Not enter into any arrangement or participate in any activity that would conflict with the interests of BGFC, or would cause BGFC to breach any of its legal or regulatory obligations.
  - g. Not act in a way which would be likely to negatively affect BGFC's reputation.
  - h. Not take advantage of BGFC's property or information or your position (or opportunities arising from these) for personal gain or to compete with BGFC.
  - i. Not take advantage of or misuse a third party's property or information.
4. It is management's task to achieve and the Board's role to oversee the delivery of shareholder value through the sustainable and efficient operation of BGFC and sound reporting and risk management practices. A statement of BGFC's policy regarding Shareholder Communication and Shareholder Meetings is available on [www.BGFC.com.au](http://www.BGFC.com.au).
5. BGFC seeks to understand the expectations of its stakeholders and to respond appropriately to our economic, social and governance responsibilities.
6. The occurrence and management of actual or perceived conflicts arise in a number of areas:
  - a. **Personal Conflicts:** These may arise in situations where your interests affect, or potentially affect, or appear to affect, your ability to properly undertake your role or make decisions. Those interests may include your financial, personal or other interests or those of your family or associates. Where a Personal Conflict arises, or may arise, you must disclose the nature of this conflict to your manager, who will ensure that measures are put in place to protect parties affected by the Personal Conflict. This may include disclosing the conflict to third parties, or ensuring that you do not participate in the relevant decision or activity.
  - b. **Director Conflicts:** Directors of a BGFC company will be guided by the constitution of the relevant BGFC company and will ensure that they abide by the provisions in the Corporations Act governing conflicts of interest together with BGFC policies and guidelines. Where there is doubt, the matter should be raised with the Chairman of the relevant BGFC subsidiary company, the Chairman of the Audit and Risk Committee or the Chairman of BGFC Limited as relevant.

7. **Confidentiality:** You must not breach your confidentiality obligations to BGFC. In addition, you must treat confidential information belonging to a third party that you may obtain in the course of your duties consistently with your confidentiality obligations to BGFC, as if that information was confidential information of BGFC.
8. You must comply with all relevant laws and regulations concerning employment as set out in the BGFC Diversity Policy which includes procedures relating to Equal Employment Opportunity. You must also comply with the Occupational Health and Safety Policy.
9. **Media:** Regarding any enquiries from any members of the press or other media, or any comment on social media, you must immediately report such enquiries or comment to the Executive Chairman, the Company Secretary or the CEO. No member of staff other than the Executive Chairman or his authorized delegate is permitted to speak with the press or other media or make any comment on social media.
10. **Government:** Regarding any enquiries or liaison with government bodies (whether they be federal, state or foreign government bodies), all such liaison should only take place with the express approval of the Executive Chairman.
11. **You must comply with the Securities' Trading Policy any other relevant policies at all times.**