

**CODE OF BUSINESS CONDUCT FOR PARTNERS &
EMPLOYEES OF SRB LEGAL
- and –
CASEWAY HOLDINGS PTY LTD**

PURPOSE OF CODE

The code underpins our commitment to upholding:

1. Ethical business practices
2. Consistent and proper business conduct
3. Occupational Health & Safety
4. Appropriate and professional business behaviour.

WHAT THE CODE DOESN'T DO

Act as a substitute for:

1. good judgment
2. “doing the right thing”.

WHO THE CODE APPLIES TO

Each and every one of us.

Those who supervise others are required to lead by example.

WHAT DO I DO IF I THINK THE CODE HAS BEEN BREACHED?

Raise it promptly with your supervisor or a Partner.

WILL MY CONCERN BE KEPT CONFIDENTIAL?

Yes. Only those that need to know will be involved.

WILL MY CONCERN BE DEALT WITH?

Yes.

HEALTH & SAFETY

OH&S is of paramount importance to us. You must always observe all safety requirements.

You must not by act or omission bring about any circumstance that could cause danger or injury to any other person.

You must observe and follow all directions for the safe and proper use of equipment.

ALCOHOL, DRUGS & CIGARETTES

At all times when you represent SRB Legal in circumstances where alcohol is being served, alcohol is to be consumed responsibly and in moderation.

No alcohol is to be consumed on SRB Legal premises without our permission.

Under no circumstances are you to attend work or represent SRB Legal if you are affected by alcohol or drugs.

No illicit drugs are to be kept at or used at our premises.

Smoking is not good for your health and is not encouraged.

Smoking is prohibited in:

1. the office
2. the areas so designated by our lessor, St Martins Properties.

EQUAL OPPORTUNITY EMPLOYER

SRB Legal and Caseway Holdings Pty Ltd are equal opportunity employers.

Employment and promotion are based on qualifications, skills, ability and attributes.

HARASSMENT & BULLYING

Harassment is action, conduct or behaviour that a reasonable person would find unwelcome, humiliating, intimidating or offensive.

Bullying is repeated behaviour directed towards an individual or a group of individuals that is unreasonable or creates a risk to health and safety.

No form of harassment or bullying in the workplace will be tolerated

Harassment and bullying must be distinguished from performance management, counselling or discipline for breach of this code or any other reasonable purpose.

Reasonable constructive criticism, feedback and comment on work performance or behaviour is intended to assist in improving your work performance and modify your behaviour. Any such criticism, feedback and comment will be constructive and not humiliating.

CORRUPTION

Building legitimate client relationships is very important and encouraged however you are only permitted to offer acceptable hospitality, entertainment and other advantages if they:

1. are permitted by, or authorised by the client
2. are appropriate
3. are lawful and commensurate with the professional good standing of the firm
4. are proportionate and reasonable to the circumstances; and
5. are moderate in terms of:
 - value
 - frequency
 - quantity.

Under no circumstances is any hospitality, entertainment or other advantage to be offered:

1. if it fails to comply with the guidelines referred to above
2. if it fails to serve a legitimate business purpose
3. if it could be construed as being given to influence the flow of work to us
4. if it is contrary to the professional standing and reputation of the firm
5. if it could be construed as being given to influence a decision to cease giving work to us and/or limiting the work to be sent to us.

Any breach of this anti-corruption policy is serious and may result in disciplinary action and potentially dismissal.

You must immediately inform your supervising Partner if:

1. you feel you are being placed under pressure to provide hospitality/entertainment contrary to the guidelines set out above
2. you receive requests from a client that you consider to be inappropriate
3. you perceive an indirect threat is being made that instructions or referrals of new work is dependent upon you meeting a client's inappropriate request.

The supervising Partner will then immediately notify BOM who will determine whether or not the circumstances justify a formal complaint or report being made to the senior management of the relevant client.

CONFLICT OF INTEREST

Conflicts of interests are defined in the Legal Profession Act 2008 and Legal Profession Conduct Rules 2010. Both provisions must be adhered to.

NETWORK, INTERNET & EMAIL USAGE SYSTEMS

The position on this is set out in the detailed Network, Internet & Email Usage Policy, a copy of which is **attached**. Failure to comply with these policies may result in disciplinary action.

EXTERNAL COMMUNICATIONS

No external communication, for example, talking to the media, on behalf of a client is permitted without a client's express approval.

INTELLECTUAL PROPERTY

Intellectual property can be an invention, trademark, original design of a practical application or expression of a good idea that has commercial value. All SRB Legal intellectual property is to be kept confidential unless otherwise authorised by a directive from the BOM.

DEFINITIONS

BOM: such partners as are appointed time to time to constitute the Board of Management

Us: SRB Legal and/or Caseway Holdings Pty Ltd

OH&S: Occupational Health & Safety