

Ethics & Fraud Policy

Fitzgerald, its Directors and Stakeholders place a strong emphasis on business integrity, efficiency, teamwork and the highest quality across all of its operations. This Policy formalises the ethical standards which we expect from all of our employees and forms an integral part of our overall policy on Corporate Social Responsibility [CSR]. This Policy applies to all Fitzgerald business operations, including Partnerships and joint ventures. We also encourage supply chain members to adhere to the principles within the Policy. The Company takes ethical behaviour seriously and failure by any employee at any level to adhere to this Policy will be progressed through our standard Disciplinary Procedures.

We are committed to:

- Recognising our responsibilities to all Stakeholders
- Shareholders
- Customers
- Employees
- Supply Chain and Business Partners
- Society, especially the communities in which we work

Dealing with all of these groups fairly, with integrity and in accordance with our contractual obligations as a minimum commitment.

In support of this:

- We are committed to take into account in our actions the laws of every jurisdiction in which we operate.
- We expect our employees to avoid and resolve conflicts of interest between their private financial activities and their part in the conduct of Fitzgerald business.
- It is not acceptable for any employee [or family member] to make or seek any personal gain from the purchase of goods or services.
- Employees must not use, exploit or disclose or attempt to use any information or material that is entrusted to them as part of their responsibilities, and must not supply information or materials for personal gain.
- Employees must immediately notify their line manager if they [or family member] have been approached to act in an unlawful way.
- The direct or indirect offer, payment, soliciting and acceptance of monies, bribes in any form are unacceptable and will result in dismissal or suspension pending investigation.
- If any employee believes that a colleague or associate may be acting in contravention of this Policy they should report their concerns immediately to the Managing Director.
- We do not handle money that is offered to us if we have reason to believe that it is being offered as a bribe or has been generated through illegal trading, money laundering or from operations not deemed to be lawful.
- Where business related hospitality or gifts are offered or sought, employees should report them to their line manager for guidance.

Approved by Nick Coley, Managing Director
April 2009

