

WINTECH GROUP LIMITED
ABN 36 003 087 689
Corporate Governance Statement

CORPORATE GOVERNANCE

Wintech Group Limited (“the Company”) is committed to implementing the highest standards of corporate governance. In determining what those high standards should involve, the Company has turned to the ASX Corporate Governance Council’s *Corporate Governance Principles and Recommendations*. The Company is pleased to advise that its practices are mostly consistent with those of the ASX guidelines.

Where the Company’s corporate governance practices do not correlate with the practices recommended by the Council, the Company does not consider that the practices are appropriate for the Company due to the size of Company.

To illustrate where the Company has addressed each of the Council’s recommendations, the following table cross-references each recommendation whether the Company has followed the recommendation and the sections of this report addressing that recommendation. Where the Company has not followed a recommendation, refer to the identified section of this report for the Company’s reasons for not following that recommendation. The table does not provide the full text of each recommendation, but rather a summary of the topic covered. Details of all of the recommendations can be found on the ASX Corporate Governance Council’s website.

Recommendation	Recommendation followed?	Section
Principle 1 – Lay solid foundations for management and oversight		
1.1 Functions of the Board and Management Companies should establish the functions reserved to the board and those delegated to senior executives and disclose those functions.	Yes	1.1
1.2 Senior Executive Evaluation Companies should disclose the process for evaluating the performance of senior executives.	Yes	1.4.11
1.3 Reporting on Principle 1 Companies should provide the information indicated in the Guide to reporting on Principle 1.	Yes	1.1; 1.4.11
Principle 2 – Structure the board to add value		
2.1 Independent Directors A majority of the board should be independent directors.	Yes	1.2
2.2 Independent Chair The chair should be an independent director.	No *	1.2
2.3 Role of the Chair and CEO The Roles of Chair and Chief Executive Officer should not be exercised by the same individual.	No *	1.2
2.4 Establishment of Nomination Committee The board should establish a nomination committee.	No *	2.3

Recommendation	Recommendation followed?	Section
2.5 Board and Individual Director Evaluation Companies should disclose the process for evaluating the performance of the board, its committees and individual directors.	Yes	1.4.10
2.6 Reporting on Principle 2 Companies should provide the information indicated in the Guide to reporting on Principle 2.	Yes	1.2; 1.4.10; 2.3.2
Principle 3 – Promote ethical and responsible decision-making		
3.1 Code of Conduct Companies should establish a code of conduct and disclose the code or a summary of the code as to: <ul style="list-style-type: none"> • the practices necessary to maintain confidence in the company's integrity • the practices necessary to take into account their legal obligations and the reasonable expectations of their stakeholders • the responsibility and accountability of individuals for reporting and investigating reports of unethical practices. 	Yes	3.1; 3.2; 3.3
3.2 Company Securities Trading Policy Companies should establish a policy concerning trading in company securities by directors, senior executives and employees, and disclose the policy or a summary of that policy.	Yes	1.4.9
3.3 Reporting on Principle 3 Companies should provide the information indicated in the Guide to reporting on Principle 3.	Yes	3.1; 3.2; 3.3
Principle 4 – Safeguard integrity in financial reporting		
4.1 Establishment of Audit Committee The board should establish an audit committee.	Yes ⁺	2.1
4.2 Structure of the Audit Committee The audit committee should be structured so that it: <ul style="list-style-type: none"> • consists only of non-executive directors • consists of a majority of independent directors • is chaired by an independent chair, who is not chair of the board • has at least three members. 	No [*]	2.1.2
4.3 Audit Committee Charter The audit committee should have a formal charter.	Yes	2.1
4.4 Reporting on Principle 4 Companies should provide the information indicated in the Guide to reporting on Principle 4.	Yes	2.1
Principle 5 – Make timely and balanced disclosure		
5.1 Policy for Compliance with Continuous Disclosure Companies should establish written policies designed to ensure compliance with ASX Listing Rule disclosure requirements and to ensure accountability at a senior executive level for that compliance and disclose those policies or a summary of those policies.	Yes	1.4.4

Recommendation	Recommendation followed?	Section
5.2 Reporting on Principle 5 Companies should provide the information indicated in the Guide to reporting on Principle 5.	Yes	1.4.4
Principle 6 – Respect the rights of shareholders		
6.1 Communications Policy Companies should design a communications policy for promoting effective communication with shareholders and encouraging their participation at general meetings and disclose their policy or a summary of that policy.	Yes	1.4.8
6.2 Reporting on Principle 6 Companies should provide the information indicated in the Guide to reporting on Principle 6.	Yes	1.4.8
Principle 7 – Recognise and manage risk		
7.1 Policies on Risk Oversight and Management Companies should establish policies for the oversight and management of material business risks and disclose a summary of those policies.	Yes	2.1.3
7.2 Risk Management Report The board should require management to design and implement the risk management and internal control system to manage the company's material business risks and report to it on whether those risks are being managed effectively. The board should disclose that management has reported to it as to the effectiveness of the company's management of its material business risks.	Yes	1.4.13
7.3 CEO and CFO Assurance The board should disclose whether it has received assurances from the chief executive officer (or equivalent) and the chief financial officer (or equivalent) that the declaration provided in accordance with section 295A of the Corporations Act is founded on a sound system of risk management and internal control and that the system is operating effectively in all material respects in relation to financial reporting risks	Yes	1.4.12
7.4 Reporting on Principle 7 Companies should provide the information indicated in the Guide to reporting on Principle 7.	Yes	2.1.3; 1.4.12; 1.4.13
Principle 8 – Remunerate fairly and responsibly		
8.1 Establishment of Remuneration Committee The board should establish a remuneration committee.	Yes ⁺	2.2
8.2 Executive and Non-Executive Director Remuneration Companies should clearly distinguish the structure of non-executive directors' remuneration from that of executive directors and senior executives.	Yes	2.2.4.1; 2.2.4.2
8.3 Reporting on Principle 8 Companies should provide the information indicated in the Guide to reporting on Principle 8.	Yes	2.2; 2.2.4.1; 2.2.4.2

* Refer to the specified Section for the Company's reasons for not following this Recommendation.

⁺ Combined Audit and Remuneration Committee.

1. Board of Directors

1.1 Role of the Board

The Board's role is to govern the Company rather than to manage it. In governing the Company, the Directors must act in the best interests of the Company as a whole. It is the role of senior management to manage the Company in accordance with the direction and delegations of the Board and the responsibility of the Board to oversee the activities of management in carrying out these delegated duties.

In carrying out its governance role, the main task of the Board is to drive the performance of the Company. The Board must also ensure that the Company complies with all of its contractual, statutory and any other legal obligations, including the requirements of any regulatory body. The Board has the final responsibility for the successful operations of the Company.

To assist the Board carry out its functions, it has developed a Code of Conduct to guide the Directors, the Chief Executive Officer, the Chief Financial Officer and other senior executives and employees in the performance of their roles.

1.2 Composition of the Board

To add value to the Company, the Board has been formed so that it has effective composition, size and commitment to adequately discharge its responsibilities and duties. The names of the Directors and their qualifications and experience are stated below along with the term of office held by each of the Directors. Directors are appointed based on the specific governance skills required by the Company and on the independence of their decision-making and judgment.

- Kim Wong – CEO and Acting Chairman (appointed to the board 22 January 2003)
- Yong Hua Tay – Non-executive Director (appointed to the board 18 August 2003)
- David Yap – Non-executive Director (appointed to the board 25 May 2004)
- Wei Li – Non-executive Director (appointed to the board 13 July 2005)

The Company recognises the importance of Non-Executive Directors and the external perspective and advice that Non-Executive Directors can offer. The Company further recognises that Independent Directors are important in ensuring shareholders that the Board is properly fulfilling its role, therefore, in addition to being Non-Executive Directors, Mr Yong Hua Tay, Mr David Yap and Mr Wei Li also meet the following criteria for independence adopted by the Company.

An Independent Director:

1. is a Non-Executive Director and:
2. is not a substantial shareholder of the Company or an officer of, or otherwise associated directly with, a substantial shareholder of the Company;
3. within the last three years has not been employed in an executive capacity by the Company or another group member, or been a Director after ceasing to hold any such employment;
4. within the last three years has not been a principal of a material professional adviser or a material consultant to the Company or another group member, or an employee materially associated with the service provided;
5. is not a material supplier or customer of the Company or another group member, or an officer of or otherwise associated directly or indirectly with a material supplier or customer;
6. has no material contractual relationship with the Company or other group member other than as a Director of the Company;

7. has not served on the Board for a period which could, or could reasonably be perceived to, materially interfere with the Director's ability to act in the best interests of the Company; and
8. is free from any interest and any business or other relationship which could, or could reasonably be perceived to, materially interfere with the Director's ability to act in the best interests of the Company.

The independence of Non-Executive Directors is assessed annually by the Board.

Due to the size of the Company, Mr Kim Wong is the Company's Chair and Chief Executive Officer. While recognising that the ASX Corporate Governance Council recommends that these roles be exercised by different individuals and that the Chair should be an independent director, the Company feels that the strong independence exercised by the other Board members mitigates any negative impact on the Company that it may have.

1.3 Responsibilities of the Board

In general, the Board is responsible for, and has the authority to determine, all matters relating to the policies, practices, management and operations of the Company. It is required to do all things that may be necessary to be done in order to carry out the objectives of the Company.

Without intending to limit this general role of the Board, the principal functions and responsibilities of the Board include the following.

1. Leadership of the Organisation: overseeing the Company and establishing codes that reflect the values of the Company and guide the conduct of the Board, management and employees.
2. Strategy Formulation: working with senior management to set and review the overall strategy and goals for the Company and ensuring that there are policies in place to govern the operation of the Company.
3. Overseeing Planning Activities: overseeing the development of the Company's strategic plan and approving that plan as well as the annual and long-term budgets.
4. Shareholder Liaison: ensuring effective communications with shareholders through an appropriate communications policy and promoting participation at general meetings of the Company.
5. Monitoring, Compliance and Risk Management: overseeing the Company's risk management, compliance, control and accountability systems and monitoring and directing the financial and operational performance of the Company.
6. Company Finances: approving expenses in excess of those approved in the annual budget and approving and monitoring acquisitions, divestitures and financial and other reporting.
7. Human Resources: appointing, and, where appropriate, removing the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) as well as reviewing the performance of the CEO and monitoring the performance of senior management in their implementation of the Company's strategy.
8. Ensuring the Health, Safety and Well-Being of Employees: in conjunction with the senior management team, developing, overseeing and reviewing the effectiveness of the Company's occupational health and safety systems to ensure the well-being of all employees.
9. Delegation of Authority: delegating appropriate powers to the CEO to ensure the effective day-to-day management of the Company and establishing and determining the powers and functions of the Committees of the Board.

Full details of the Board's role and responsibilities are contained in the Board Charter, a copy of which is contained on the Company's website.

1.4 Board Policies

1.4.1 Conflicts of Interest

Directors must:

- disclose to the Board actual or potential conflicts of interest that may or might reasonably be thought to exist between the interests of the Director and the interests of any other parties in carrying out the activities of the Company; and
- if requested by the Board, within seven days or such further period as may be permitted, take such necessary and reasonable steps to remove any conflict of interest.

If a Director cannot or is unwilling to remove a conflict of interest then the Director must, as per the *Corporations Act*, absent himself or herself from the room when discussion and/or voting occurs on matters about which the conflict relates.

1.4.2 Commitments

Each member of the Board is committed to spending sufficient time to enable them to carry out their duties as a Director of the Company.

1.4.3 Confidentiality

In accordance with legal requirements and agreed ethical standards, Directors and key executives of the Company have agreed to keep confidential, information received in the course of the exercise of their duties and will not disclose non-public information except where disclosure is authorised or legally mandated.

1.4.4 Continuous Disclosure

The Board has designated the Company Secretary as the person responsible for overseeing and coordinating disclosure of information to the ASX as well as communicating with the ASX. In accordance with the ASX Listing Rules, the Company immediately notifies the ASX of information:

- concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities; and
- that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

Upon confirmation of receipt from the ASX, the Company posts all information disclosed in accordance with this policy on the Company's website in an area accessible by the public.

1.4.5 Education and Induction

New Directors undergo an induction process in which they are given a full briefing on the Company. This includes meetings with key executives, tours of the premises, an induction package and presentations. Information conveyed to new Directors includes:

- details of the roles and responsibilities of a Director with an outline of the qualities required to be a successful Director;
- formal policies on Director appointment as well as conduct and contribution expectations;
- details of all relevant legal requirements;
- a copy of the Board Charter;
- guidelines on how the Board processes function;

- details of past, recent and likely future developments relating to the Board including anticipated regulatory changes;
- background information on and contact information for key people in the organisation including an outline of their roles and capabilities;
- an analysis of the Company;
- a synopsis of the current strategic direction of the Company including a copy of the current strategic plan and annual budget; and
- a copy of the Constitution of the Company.

In order to achieve continuing improvement in Board performance, all Directors are encouraged to undergo continual professional development. Specifically, Directors are provided with the resources and training to address skills gaps where they are identified.

1.4.6 Independent Professional Advice

The Board collectively and each Director has the right to seek independent professional advice at the Company's expense, up to specified limits, to assist them to carry out their responsibilities.

1.4.7 Related Party Transactions

Related party transactions include any financial transaction between a Director and the Company and will be reported in writing to each Board meeting. Unless there is an exemption under the *Corporations Act* from the requirement to obtain shareholder approval for the related party transaction, the Board cannot approve the transaction.

1.4.8 Shareholder Communication

The Company respects the rights of its shareholders and to facilitate the effective exercise of those rights the Company is committed to:

- communicating effectively with shareholders through releases to the market via ASX, the Company's website, information mailed to shareholders and the general meetings of the Company;
- giving shareholders ready access to balanced and understandable information about the Company and corporate proposals;
- making it easy for shareholders to participate in general meetings of the Company; and
- requesting the external auditor to attend the annual general meeting and be available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report.

The Company also makes available a telephone number and email address for shareholders to make enquiries of the Company.

Information is communicated to shareholders through:

- the annual report which is published on the Company's website and distributed to shareholders where specifically requested;
- the half-year shareholders' report which is published on the Company's website and distributed to shareholders where specifically requested, containing summarised financial information and a review of the operations during the period since the annual report; and
- other correspondence regarding matters impacting on shareholders as required.

All material documents that are released publicly are made available on the Company's website.

Shareholders are encouraged to participate in the Company's Annual General Meeting to ensure accountability. Important issues are presented to shareholders as separate resolutions.

1.4.9 Trading in Company Shares

The company's Employee Share Trading Policy aims to:

- protect stakeholders' interests at all times
- ensure that directors and employees do not use any information they possess for their personal advantage, or to their clients' or the company's detriment, and
- ensure that directors and employees comply with insider trading legislation of the various jurisdictions in which transactions may take place.

Supplementary to the 'inside information' rule, trading in the company's securities is restricted to the following trading windows:

- 30 day period beginning on the second day after the release of the company's half-year results or yearly results
- 30 day period beginning on the second day after the company's Annual General Meeting; and
- period commencing on the day after the issue of a prospectus offering the company's securities (or a document containing equivalent information) and ending on the day the offer closes.

Purchase or sale of company's shares and/or options over such shares by Directors, Executives and Staff of the company should only occur in circumstances where the market is considered to be fully informed of the company's activities. This policy requires that the relevant person notify the Company Secretary of their intention to trade in the company's shares and/or options over such shares prior to transaction and that the Company Secretary be required to discuss the proposed trading intentions with either the Chairman of the Managing Director. The Board recognises that it is the individual responsibility of each director to carry this policy through.

Breaches of this policy may lead to disciplinary action being taken against the employee, including dismissal in serious cases.

1.4.10 Board and Individual Director Performance Review/Evaluation

Each year the Board conducts an evaluation of its performance. The evaluation for this financial year was conducted by the board and the Board's performance was measured against both qualitative and quantitative indicators. The objective of this evaluation was to provide best practice corporate governance to the Company.

1.4.11 Performance of Senior Executives

The process adopted by the Board to review the performance of the Company's senior executives is available on the Company's website in its Board Charter. The performance of the Company's senior executives has been assessed this year in accordance with the policy adopted by the Board.

1.4.12 Attestations by CEO and CFO

In accordance with the Board's policy, the CEO and the CFO made the attestations recommended by the ASX Corporate Governance Council as to the Company's financial condition prior to the Board signing this Annual Report.

1.4.13 Risk Management Accountability

As part of the process of approving the financial statements, at each reporting date the CEO and other responsible senior executives provide statements in writing to the Board on the quality and effectiveness of the company's risk management and internal compliance and control systems.

2. Board Committees

Due to the size of the Company there is only one standing committee being the combined Audit & Remuneration Committee which was formed by resolution of the Board. The Functions of this committee are discussed in respect of the respective Audit Committee and Remuneration Committee functions below.

2.1 Audit Committee

Below is a summary of the role, composition and responsibilities of the Audit Committee (which is part of the Company's combined Audit and Remuneration Committee). Further details are contained in the Audit Committee's Charter, which is available on the Company's website in the Company's Board Charter.

2.1.1 Role

The Audit Committee is responsible for reviewing the integrity of the Company's financial reporting and overseeing the independence of the external auditors.

2.1.2 Composition

Due to the size of the Company and the Board, the Audit and Remuneration Committee consists of two members. Members are appointed by the Board from amongst the Non-Executive Directors, all of whom are also independent. The current members of the Audit Committee are Mr Yong Hua Tay and Mr David Yap both of whom are Independent Directors. Mr David Yap, the Chair of the combined Audit and Remuneration Committee is an Independent Director. All members can read and understand financial statements and are otherwise financially literate.

In addition to the independent directors listed above, the company secretary Phillip Hains is a member of the Committee.

2.1.3 Responsibilities

The Audit Committee reviews the audited annual and half-yearly financial statements and any reports which accompany published financial statements before submission to the Board and recommends their approval.

The Audit Committee also recommends to the Board the appointment of the external auditor and the internal auditor and, each year, reviews the appointment of the external auditor, their independence, the audit fee and any questions of resignation or dismissal.

The Audit Committee is also responsible for establishing policies on risk oversight and management.

2.2 Remuneration Committee

2.2.1 Role

The role of the Remuneration Committee (which is part of the Company's combined Audit and Remuneration Committee) is to assist the Board in fulfilling its responsibilities in respect of establishing appropriate remuneration levels and incentive policies for employees.

2.2.2 Composition

Due to the size of the Board the Audit and Remuneration Committee consists of two members. Members are appointed by the Board from amongst the Non-Executive Directors, all of whom are also independent. The current members of the Audit Committee are Mr Yong Hua Tay and Mr David Yap both of whom are Independent Directors. Mr David Yap, the Chair of the combined Audit and Remuneration Committee is an Independent Director.

In addition to the independent directors listed above, the company secretary Phillip Hains is a member of the Committee.

2.2.3 Responsibilities

The responsibilities of the Remuneration Committee include setting policies for senior officers' remuneration, setting the terms and conditions of employment for the Chief Executive Officer, reviewing and making recommendations to the Board on the Company's incentive schemes and superannuation arrangements, reviewing the remuneration of both Executive and Non-Executive Directors and making recommendations to the Board on any proposed changes and undertaking review of the Chief Executive Officer's performance, including, setting with the Chief Executive Officer goals for the coming year and reviewing progress in achieving those goals.

2.2.4 Remuneration Policy

Remuneration levels for directors, secretaries, senior managers of the Company, and relevant group executives of the consolidated group ("the directors and senior executives") are competitively set to attract and retain appropriately qualified and experienced directors and senior executives. The remuneration committee obtains independent advice on the appropriateness of remuneration packages given trends in comparative companies both locally and internationally and the objectives of the Company's remuneration strategy.

The remuneration structures explained below are designed to attract suitably qualified candidates, reward the achievement of strategic objectives, and achieve the broader outcome of creation of value for shareholders. The remuneration structures take into account:

- the capability and experience of the directors and senior executives
- the directors and senior executives ability to control the relevant segments' performance
- the consolidated group's performance including:
 - the consolidated group's earnings
 - the growth in share price and returns on shareholder wealth
- the amount of incentives within each directors and senior executive's remuneration.

2.2.4.2 Non-Executive Director Remuneration Policy

Non-Executive Directors are paid their fees out of the maximum aggregate amount approved by shareholders for the remuneration of Non-Executive Directors. Non-Executive Directors do not receive performance based bonuses and do not participate in equity schemes of the Company.

Non-Executive Directors are entitled to statutory superannuation.

2.3 Nomination Committee

Due to the size of the company it does not have a Nomination Committee as it is deemed to be more efficient to have the full board consider membership nominations and configuration and carry out the functions of the Nomination Committee. The Role and Responsibility

2.3.1 Role

The role of the Nomination Committee is to help achieve a structured Board that adds value to the Company by ensuring an appropriate mix of skills are present in Directors on the Board at all times.

2.3.3 Responsibilities

The responsibilities of the Nomination Committee include devising criteria for Board membership, regularly reviewing the need for various skills and experience on the Board and identifying specific individuals for nomination as Directors for review by the Board. The Nomination Committee also oversees management succession plans including the CEO and his/her direct reports and evaluates the Board's performance and makes recommendations for the appointment and removal of Directors.

2.3.4 Criteria for Selection of Directors

Directors are appointed based on the specific governance skills required by the Company. In addition, Directors should have the relevant blend of personal experience in:

- accounting and financial management;
- legal skills; and
- CEO-level business experience.

3. Interests of Stakeholders

3.1 Company Code of Conduct

As part of its commitment to recognising the legitimate interests of stakeholders, the Company has established a Code of Conduct to guide compliance with legal and other obligations to legitimate stakeholders. These stakeholders include employees, clients, customers, government authorities, creditors and the community as whole. This Code includes the following.

All Directors, senior executives and employees are reminded annually of the existence of the Company Code of Conduct and are requested to confirm they have read it.

Ethical Standards

All Directors, senior executives and employees are expected to act with the utmost honesty and integrity, striving at all times to enhance the reputation and performance of the Company.

Responsibilities to Shareholders and the Financial Community Generally

The Company complies with the spirit as well as the letter of all laws and regulations that govern shareholders' rights. The Company has processes in place designed to ensure the truthful and factual presentation of the Company's financial position and prepares and maintains its accounts fairly and accurately in accordance with the generally accepted accounting and financial reporting standards.

Responsibilities to Clients, Customers and Consumers

Each employee has an obligation to use their best efforts to deal in a fair and responsible manner with each of the Company's clients, customers and consumers. The Company for its part is committed to providing clients, customers and consumers with fair value.

Employment Practices

The Company endeavours to provide a safe workplace in which there is equal opportunity for all employees at all levels of the Company. The Company does not tolerate the offering or acceptance of bribes or the misuse of Company assets or resources.

Obligations Relative to Fair Trading and Dealing

The Company aims to conduct its business fairly and to compete ethically and in accordance with relevant competition laws. The Company strives to deal fairly with the Company's customers, suppliers, competitors and other employees and encourages its employees to strive to do the same.

Responsibilities to the Community

As part of the community the Company:

- is committed to conducting its business in accordance with applicable environmental laws and regulations and encourages all employees to have regard for the environment when carrying out their jobs;
- encourages all employees to engage in activities beneficial to their local community; and
- supports community charities.

Responsibility to the Individual

The Company is committed to keeping private information from employees, clients, customers, consumers and investors confidential and protected from uses other than those for which it was provided.

Conflicts of Interest

Employees and Directors must avoid conflicts as well as the appearance of conflicts between personal interests and the interests of the Company.

How the Company Complies with Legislation Affecting its Operations

Within Australia, the Company strives to comply with the spirit and the letter of all legislation affecting its operations. Outside Australia, the Company will abide by local laws in all countries in which it operates. Where those laws are not as stringent as the Company's operating policies, particularly in relation to the environment, workplace practices, intellectual property and the giving of "gifts", Company policy will prevail.

How the Company Monitors and Ensures Compliance with its Code

The Board, management and all employees of the Company are committed to implementing this Code of Conduct and each individual is accountable for such compliance. Disciplinary measures may be imposed for violating the Code.

3.2 Whistleblower Protection

The Company has established a Whistleblowing Policy in accordance with legislative requirements and good practice recommendations. The policy aims to provide a working environment that enables employees to voice genuine concerns in relation to:

- breaches of relevant legislation;
- breaches of the Company's Vision and Values;
- financial misconduct or impropriety or fraud;
- failure to comply with legal obligations;
- danger to health and safety or the environment;
- criminal activity; and
- attempts to conceal any of the above.

In addition, the Company has in place and enforces a number of key policies including:

- Occupational Health and Safety;
- Diversity in Employment;
- Harassment;
- Privacy;

3.3 Corporate Responsibility

The Company has adopted a number of practices to engage stakeholders in relation to its business activities. These include:

- Community:
 - Sponsorships;
 - Donations; and
 - Fundraising.
- Workplace:
 - Safety awareness campaign; and
 - Staff development and training.
- Environment:
 - Sustainability audits; and
 - Climate change initiatives.