

Contango Income Generator Limited
ABN 40 160 959 991

CODE OF CONDUCT POLICY

August 2015

CODE OF CONDUCT

1. General

In order to maintain the reputation of Income Generator Limited, the conduct of all directors and employees, (both permanent and temporary), contractors and consultants, must at all times observe the highest standards of integrity and professionalism and failure to do so will be regarded as a disciplinary offence.

Employees must be fair, and not allow conflicts of interest or bias to influence their actions to ensure that:

- client and investor interests are paramount in all decisions and transactions;
- the execution of client requirements come before those of CIE or employee; and
- employees conduct must contribute to markets operating in an efficient and informed manner.

Staff must carry out business with due care, competence and diligence.

2. Equal Opportunity

The Company is committed to providing a work environment free of all forms of discrimination.

The Company seeks to maintain a working atmosphere consistent with encouraging staff to perform to their highest capabilities free from all forms of intimidation and insult.

3. Honesty and Personal Dealings in Securities

Employees must maintain high standards of honesty and fair dealing in their work for the Company. Strict adherence to the Company's policies and procedures as well as obligations under all relevant statutory regulatory bodies is essential.

The company has procedures for any employee wishing to undertake dealing in securities. This is for the protection of the employees and the Company from any criticism and to guard against the possibility of criminal proceedings being taken against any individual for "insider trading".

4. Personal Conduct and Financial Responsibility

Employees must always conduct their personal affairs, including the management of personal finances, to avoid discredit to themselves or to the Company.

Employees must not use their position within the Company to influence anyone for personal gain or benefit.

5. Confidentiality

The basis of the Company's relationships with its clients is based on client confidence that their affairs will not be divulged to anyone else.

The business and affairs of the Company and its clients are strictly confidential and must never be discussed with, or communicated to, unauthorised persons.

6. External Business Interests

During their employment with the Company, employees are not permitted to engage in any other business activity without the prior permission of the Chairman of the board.

7. Termination

7.1 Resignation

All employees have a minimum notice period of set out in their employment contract. Notice of resignation should be in writing detailing the last day of work and provided to the employee's immediate superior.

Failure to work the required period may incur a salary deduction equivalent to the unworked notice time.

The Company reserves the right to dismiss an employee without notice for gross misconduct, and other circumstances warranting instant dismissal.

7.2 Garden Leave

The Company may in its absolute discretion exclude an employee from its premises or require the employee to carry out their duties (or no duties at all) at a place other than their normal place of work during their resignation period.

7.3 Return of Property

Upon termination of employment, employees must immediately return to the Company or its authorised representative all plans, statistics, documents, records, data and papers or other confidential information in their possession or control, which relate in any way to the business or affairs of the Company. Employees are not entitled to retain a copy of any such document.

Where such information is recorded in the form of computer information and software then the Company may, on request, agree that such information will instead be deleted or erased in such a manner that it cannot be retrieved.

In addition, upon termination of employment, employees must immediately return to the Company any property in their possession or control including, but not limited to:

- any computer equipment (including software) owned or leased by the Company;
- any communications equipment (including but not limited to facsimile machines and mobile phones) owned or leased by the Company;
- keys and other means of accessing any premises owned or occupied by the Company;
- any credit cards (including but not limited to taxi cards or vouchers) made available by the Company.

8. Other

8.1 Leave

Leave entitlements for holiday, illness, long service and any other special leave are outlined in each signed employment letter.

8.2 No Smoking

The Company operates a "No Smoking Policy" in its offices at all times (including weekends).

8.3 Personal Property

The Company does not take any responsibility for loss or damage to personal property on its premises.