

CODE OF CONDUCT

PENINSULA MINES LIMITED ("COMPANY")

This Code of Conduct sets out the principles and standards which the Board, management and employees of the Company are encouraged to consider when dealing with each other, shareholders and the broad community.

1. Responsibility to Shareholders

The Company aims:

- (a) to pursue its business strategies within an appropriate framework which it believes safeguards the rights and interests of the Company's shareholders; and
- (b) to comply with systems of control and accountability as part of its corporate governance with openness and integrity.

2. Integrity and Honesty

Directors, management and staff shall endeavour to deal with the Company's customers, suppliers, competitors and each other with honesty, fairness and integrity and observe the rule and spirit of the legal and regulatory environment in which the Company operates.

3. Respect for the Law

The Company is to comply with requirements which affect its business, in particular those in respect of the law, occupational health and safety, the environment, native title and cultural heritage. Any transgression from the applicable legal rules is to be reported to the Chairperson as soon as a person becomes aware of such a transgression.

4. Conflicts of Interest

Where a real or apparent conflict of interest arises concerning a member of management, staff or a consultant, the matter should be brought to the attention of the Chairperson. If the matter concerns a director, that director must notify the other board members so that it may be considered and dealt with in an appropriate manner for all concerned.

5. Protection of Assets

Directors, management and staff must protect the assets of the Company to ensure they are available for the Company and that no property, information or position belonging to the Company or opportunity arising from these are used for personal gain or to compete with the Company.

6. Confidential Information

Directors, management and staff must respect confidentiality of all information of a confidential nature which is acquired in the course of the Company's business and not disclose or make improper use of such confidential information to any person unless specific authorisation is given for disclosure or disclosure is legally mandated.

7. Employment Practices

The Company will, where appropriate and dependant on availability, employ contractors or staff with skills required to carry out vacant positions.

The Company will endeavour to ensure a safe work place and maintain proper occupational health and safety practices commensurate with the nature of the Company's business and activities.

8. Responsibility to the Community

The Company will appropriately recognise, consider and respect environmental issues which arise in relation to the Company's activities and comply with all applicable legal requirements.

9. Responsibility to the Individual

The Company recognises and respects the rights of individuals and will endeavour to comply with the applicable legal rules regarding privacy, privileges, private and confidential information.

10. Obligations Relative to Fair Trading and Dealing

The Company will endeavour to deal with others in a way that is fair and not engage in deceptive practices.

11. Compliance with the Code of Conduct

Any breach of compliance with this Code of Conduct is to be reported directly to the Chairperson or Report and Investigation Officer (if one is appointed), as appropriate.

12. Periodic Review of Code

The Company Secretary will monitor compliance with this Code of Conduct periodically by liaising with the Board, management and staff especially in relation to any areas of difficulty which arise from this Code of Conduct and any other ideas or suggestions for improvement of it. Suggestions for improvements or amendments to this Code of Conduct can be made at any time by providing a written note to the Chairperson.