

## CODE OF CONDUCT

Approved by the Board of Directors on 21 October 2011

### Part I - Introduction

#### 1 Purpose

This Code of Conduct (Code) sets the standard of conduct expected of Strike Resources' directors, officers, employees and contractors (Personnel) in carrying out their roles.

Through this Code and related Policies we seek to maintain a culture which will protect and enhance our reputation:

- as an ethical and valued corporate citizen of the countries in which we operate
- for valuing the health, safety and lifestyle of all people whom our activities affect
- as a trusted business partner, and
- as a company where people enjoy their work.

### Part II –Corporate and Personal Behaviour

#### 2 Interpersonal and Business Relations

We conduct our dealings with individuals - inside and outside the Company – and with other businesses with fairness, honesty, integrity and respect.

Our managers act with fairness and respect in dealings with those who report to them.

We foster a co-operative work environment where all may contribute their talents to decision making within their level of authority, to obtain the best available outcomes from our human resources.

We do not tolerate workplace bullying.

#### 3 Serving our Investors

We acknowledge that the Company belongs to shareholders and we manage its resources accordingly.

Strike promptly discloses to the market information which may significantly affect its share price – except where good business practice requires, and the law permits, confidentiality to be maintained.

We are open, honest and balanced in all our disclosures, not seeking to hide or amplify any negative or positive information.

Internally, we promptly report developments which may significantly affect our share price, via a manager where appropriate, to the Managing Director and Company Secretary so that a disclosure decision may be made.

Our public statements of mineral resources and reserves and exploration results comply with the JORC Code to maximise investors' ability to make sound investment decisions.

We do not engage in selective disclosure which favours some investors over others.

#### 4 Health & Safety

We do not tolerate harm to the health or safety of Personnel or others whom our activities may affect.

We go beyond legal minimum health and safety standards where necessary to ensure good practice.

Other business imperatives will not compromise our commitment to avoiding harm to people or property.

All our Personnel share responsibility for the safety of the work place and of our interactions with others.

## **5 Communities and Heritage**

Building good relationships with communities affected by our operations is essential to being a good corporate citizen.

Our relationships with local communities are characterised by:

- community participation in the benefits of our work
- respecting their culture, heritage and lifestyle
- open communication and mutual trust, and
- delivering on our commitments.

## **6 Environment**

Effective management of our impact on the environment is essential to good corporate citizenship.

We strive to minimise unnecessary harm to the environment. Accordingly, at a minimum:

- our activities will comply with environmental laws and, where necessary, go further to achieve good environmental practice, and
- we return work sites to a state compatible with a healthy environment.

## **7 Respecting the Law**

We respect the law in all countries where we operate.

We ensure that we are aware of all laws relevant to our activities by taking appropriate internal and external legal advice.

## **8 Anti-Corruption**

We do not seek to corruptly influence officials in Australia or overseas. This is unethical, results in severe penalties under Australian and foreign laws and would seriously damage our reputation.

Any direct or implied request by a public official for an improper benefit will be immediately reported to the Company Secretary, to enable a decision on the appropriate action to be made.

We take appropriate steps to ensure that our consultants, contractors and business partners have high ethical standards and do not engage in corrupt practices.

## **9 Diversity and Anti-Discrimination**

We value the diverse gender, backgrounds, cultures and other characteristics of our people.

We do not discriminate against people on the basis of race, gender, marital status, religion or on any other basis which is against the law or irrelevant to their ability to contribute to our success.

We treat each other according to our skills and qualifications in all aspects of the employment relationship; including recruitment, promotion, posting, training, benefits and termination.

## **10 Inside and Confidential Information**

We do not deal in shares of Strike (or other listed companies which Strike has a major relationship with) while we have non-public information which gives us an advantage over other investors.

Even while we do not have non-public information, we do not trade in shares of those companies during periods specified by the Company, to avoid any perception that insider trading has occurred.

We disclose Company confidential information inside the Company only on a need-to-know basis and outside the Company only to parties who have signed a confidentiality agreement.

## **11 Conflicts of Interest**

We avoid any situation where our personal interest conflicts - or appears to conflict - with our duty to the Company.

We do not take personal advantage of business opportunities within the scope of the Company's operations which we learn of in the course of our duties, but promptly inform the Company.

We do not use our roles in the Company to obtain benefits for ourselves or associates from those who do - or may do - business with Strike (except small, non-monetary benefits which we disclose).

## **12 Financial Controls and Records**

Accounting and financial records are maintained which accurately reflect all Company transactions and assets.

We implement adequate controls to prevent fraud and loss of company property.

Our accounting and financial records are adequately protected from destruction or tampering and are retained for the period required by law.

## **13 Using Company Resources**

We use Company resources and our working time only for proper Company purposes.

We strive for efficiency in the use of the Company's resources and avoid wastage.

We take appropriate steps to understand and manage risks affecting the Company.

We do not pursue outside personal, business or financial interests using Company resources or time.

## **14 Alcohol and Drugs**

We do not drink alcohol during work time, except at Company social functions, and then only to an extent which does not lead to inappropriate behaviour or cause or contribute to safety risk.

We do not use, possess or be under the influence of any unlawful drug during work time or at Company functions.

# **Part III – Compliance and Administration**

## **15 Detailed Policies**

The Company has detailed policies setting out in detail the behaviours required of Personnel to ensure compliance with each Section of this Code (Policies).

Policies are regularly reviewed and updated to ensure that they remain consistent with the law and good practice, as they change over time.

All Policies referred to in this Code are available from the Company Secretary.

## **16 Compliance with the Code**

All new Personnel are inducted in this Code and the Policies and trained in their obligations at suitable intervals.

We report any known breach of this Code or a Policy to a manager, who will report it to the Managing Director. A suspected breach by the Managing Director is reported to the Chairman.

Personnel reporting a suspected breach of this Code or a Policy in good faith are not be subject to any adverse consequences as a result, even if an investigation concludes that there was no breach.

All Personnel have a right to be heard if a complaint is made against them.

Any alleged breach of the Code or a Policy will be investigated promptly and, if proven, will result in appropriate disciplinary action, up to and including termination of employment for serious breaches.

The Board receives periodic reports on compliance with this Code and the Policies.

### **Acknowledgement**

I, Stephen Gethin, have read and agree to abide by this Code of Conduct

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(signature)

1 November 2011