

National Leisure and Gaming Limited

Code of Conduct



Adopted 9 February 2006

National Leisure & Gaming Limited Code of Conduct

Directors and Management of National Leisure and Gaming Limited (NLG) are committed to maintaining the best practice in corporate governance and observing high standards of ethics and behaviour in all of NLG's activities, including NLG's interaction with its customers, shareholders, employees, suppliers, business partners, the community and environment in which NLG operates.

All NLG employees play an important role in establishing, maintaining and enhancing the reputation of NLG and its venues and ensuring the high standards of ethics and behaviour that NLG is committed to are observed. It is required that employees display the highest levels of professionalism in all aspects of their work and comply with this Code of Conduct (Code) and all applicable laws and other applicable NLG policies.

1. Introduction

This Code provides ethical and legal guidance to all employees in the conduct of their and NLG's business. It is about how to relate to customers, shareholders, employees, suppliers, business partners, government and the community.

This Code provides a common behavioural framework for all NLG employees, irrespective of their specific job or location but is not intended to be all-encompassing. There are areas in which NLG has or will develop specific detailed policies. This Code is to be read and applied in conjunction with these policies.

This Code applies to all Directors and employees of NLG. The standards set out in this Code extend beyond normal working hours, and apply to employees fulfilling their roles while on NLG business, including after hours functions, conferences and social activities.

It is a condition of employment with NLG that all employees comply with this Code and all applicable laws and NLG policies; failure to comply may result in termination of employment.

2. General Principles

2.1 Compliance with Laws

NLG operates in a highly regulated business environment and its activities are subject to numerous laws, regulations and licensing conditions. Employees must ensure that they familiarise themselves with the laws, regulations and licence conditions applicable to their activities. If in doubt, employees are to seek advice.

Employee activities and NLG business activities must be conducted in accordance with the spirit and letter of the law.

NLG aims to provide a safe environment in which to work and for customers and suppliers to visit. Employees must work safely and apply appropriate industry practices and laws to protect the health, safety and wellbeing of employees, customers and suppliers.

2.2 Fair Dealing

NLG aims to promote an environment in which all individual employees, customers and suppliers are treated fairly and equitably irrespective of, among other things, sex, race, sexual orientation, age, disability, and religion or ethnic origin. Employees are to conduct themselves, and NLG business activities are to be directed, to facilitate these aims being achieved.

NLG will compete effectively and fairly in the markets in which it operates. It will be honest, ethical and responsible in the way it presents products and services to its customers, uses its market power and its pricing practices.

NLG will be fair and honest in its relationship with suppliers and contractors from selection through to payment and termination of the relationship.

All commercial transactions will be properly and accurately recorded.

Corrupt practices are unacceptable. No bribes or similar payments will be made to, or accepted from, any party.

2.3 Confidentiality & Protection of Company Assets

Employees must keep confidential all information that would reasonably be considered to be confidential, including but not limited to staff and patron details, performance and financial details and NLG policies and procedures.

NLG will maintain the privacy of confidential information relating to its employees and customers.

Assets and confidential information should be fully protected and must not be used by employees for personal gain or for any other reason that is not in the best interests of NLG.

Misappropriation of property owned by NLG, employees, customers or suppliers will not be tolerated. Any misappropriation should be immediately reported and properly investigated. Appropriate disciplinary and or legal action will be taken.

2.4 Conflicts of Interest

Employees are to act in the best interests of NLG.

Employees must not engage in activities that involve, or could appear to involve, a conflict between their personal interests and the interests of NLG.

Areas where conflicts might arise include: share ownership, direct or indirect personal interest in contracts, dual employment with outside organisations or seeking or accepting gifts or entertainment beyond levels considered reasonable in NLG's business environment.

Any actual or potential conflicts of interest are to fully disclosed to appropriate management.

2.5 Reporting Non-Compliance

Employees are to report through to their manager genuine suspicions of non-compliance with this Code.

Non-compliance with the Code will also be monitored and reported on.

3. Specific Principles

3.1 Continuous Disclosure

NLG is committed to making sure that accurate information about its affairs is made available to its stakeholders in a timely way, in particular to make sure that the market is properly informed of anything which would be likely to have a material effect on NLG's share price.

NLG's Continuous Disclosure Policy sets out this policy in more detail and must be complied with.

3.2 Trading in NLG Securities

Directors and employees must not buy or sell NLG shares and securities if they are in possession of price-sensitive information that is generally not available to the market. Certain employees are also restricted from any trading in NLG securities during certain period of each financial year.

NLG's Trading in Securities Policy sets out this policy in more detail and must be complied with.

3.3 Employees

NLG is an equal opportunity employer. NLG aims to:

- (i) make human resource decisions on the basis of merit with the information available to it; that is employment decisions will be made on the basis of the possession of skills, experience, qualifications and characteristics relevant to the performance of work;
- (ii) ensure unlawful discrimination does not occur in the workplace or in circumstances arising out of the employment relationship;
- (iii) maintain a workplace free from sexual harassment, unfair discrimination or other offensive conduct; and
- (iv) promote a work environment in which individuals have the opportunity to develop to their full potential.

An employee who is found to be in breach of this Code, other NLG policies or applicable laws will be subject to disciplinary action. Inappropriate conduct or performance, or non-compliance issues will be brought to the attention of the employee who will be allowed to respond to any allegations. Except in the case of summary dismissal for serious misconduct, employees should be given a reasonable chance to remedy the inappropriate conduct or performance.

Any grievances with respect to an employee's employment, treatment, the action of other staff members, customers or suppliers or compliance with this Code or other NLG policies should be raised. Employees who have genuine suspicions of wrongdoings are to have a safe environment in which to speak up without fear, reprisal or victimisation.

NLG will introduce Human Resources Policies that set out these policies in more detail and must be complied with.

3.4 Occupational, Health, Safety & Environment

NLG aims to provide its business activities in a safe manner and prevent injury to its employees, customers, suppliers and contractors as a result of its operations.

NLG endeavours to reduce the environmental impacts of its business activities and will seek to do this through continual improvement of environmental performance, protection and safety.

NLG is committed to provide effective support and training for its employees to assist them in their responsibilities of ensuring a safe workplace and reducing the environmental impacts of their activities.

4. Administration

4.1 Publication of the Code

This Code will be available at all venues and places of employment by NLG.

4.2 Continual Improvement

NLG will continue to monitor the appropriateness and effectiveness of this Code and adopt appropriate agreed improvements and reporting procedures.

4.3 Amendments and Updates

This Code may be updated from time to time. Employees will be required to comply with the Code as updated.

Amendments to this Code must be approved by the Board of NLG.

All updates and amendments are to be communicated to employees and will appear on the NLG Intranet.

4.4 Questions About this Code

Questions about this Code and its application by employees should be directed to their Manager or Human Resources.

Questions about this Code and its application by shareholders and members of the public should be directed to the Managing Director.