

VIKING ASHANTI LIMITED
ACN 126 200 280

CORPORATE CODE OF CONDUCT
As approved by the Board of Directors on 19 March 2010

Preamble

1. This Corporate Code of Conduct (**Code**) is endorsed by the Board of directors of Viking Ashanti Limited (**Company**).
2. This Code sets out the standards with which the directors, officers, managers, employees and consultants (together **Personnel**) of the Company and any of its subsidiaries are expected to comply in relation to the affairs of the Company business and when dealing with each other, shareholders and the broader community.
3. The Company undertakes to make the Code known and accessible to all Personnel. The Company's management will strive to ensure that the Code is observed in word and in spirit by all who represent the Company, through active monitoring of the Code as it is applied by Personnel.

Compliance

4. The Company's policy is to promote active compliance with legislation at all times. All Personnel must comply with all applicable laws, rules and regulations.
5. Where necessary, Personnel must, after consultation with their supervisor, seek appropriate legal advice.

Conflicts

6. Conflicts of interest are to be avoided and any actual or potential conflict is to be reported to the Company Secretary. Personnel must not exploit their position with the Company for personal gain. Personnel must not have a significant ownership interest in any enterprise which may compromise loyalty to the Company.
7. Personnel have a duty to bring business opportunities identified through the use of Company property, information or position to the attention of the Company.

Fair dealing

8. All dealings with customers, suppliers, competitors, employees and other stakeholders of the Company are to be conducted with honesty, integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

Company assets and property

9. All assets of the Company are to be properly used in the interests of the Company and must be safeguarded from loss and misuse.

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Knowledge and information

10. The accuracy, use and handling of information is critical to the Company's integrity and reputation.
11. Personnel must ensure that information is recorded by them honestly and accurately and is made known to their relevant supervisor so as to enable the Company to meet its obligation to keep the market fully informed about its activities.
12. Personnel must never make improper use of knowledge, information, documents or other company resources obtained in the course of employment with the Company. Personnel must respect the confidentiality and observe the privacy of information about the Company, its customers and fellow Personnel. The security and proper use of Company information is mandatory.

Computers, email and internet use

13. Personnel must use computer facilities appropriately for authorised and legitimate business purposes only. Unauthorised use of, manipulation of or other interference with computer facilities will be treated seriously and may result in the Company taking disciplinary action against the offending Personnel, including summary (instant) dismissal.
14. The Company's e-mail and internet / intranet systems are company resources intended for business purposes only. Personnel are required to adopt a professional and disciplined approach when using them and they must only be used for appropriate business communication.
15. Any improper use of the Company's e-mail and internet / intranet systems, including without limitation knowingly transmitting, receiving or visiting sites containing material that could be perceived by others as offensive, sexually explicit, annoying, insulting, harassing or intimidating, is a serious breach of this Code and may result in the Company taking disciplinary action against the offending Personnel, including summary (instant) dismissal.

Confidential information

16. Confidential or commercially sensitive information must not be disclosed without proper authorisation.

Disclosure and securities trading

17. Continuous disclosure obligations are to be met in accordance with the Company's Continuous Disclosure Policy. All Personnel should familiarise themselves with the Company's Continuous Disclosure Policy, a copy of which can be obtained from the Company's website.
18. Securities trading must be conducted in compliance with the Company's Securities Dealing Policy. All Personnel should familiarise themselves with the Company's Securities Dealing Policy, a copy of which can be obtained from the Company's website.

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Health, safety and environment

19. The Company is committed to protecting the health and safety of its Personnel.
20. The Company is committed to protecting the environment in the conduct of its operations.
21. All health, safety and environmental obligations and good practices are to be recognised, respected and adhered to.

Employment practices

22. The Company subscribes to good employment practices, specifically:
 - (a) all employment practices are to be fair and non-discriminatory;
 - (b) a safe system of work is to be maintained;
 - (c) all forms of discrimination and harassment are prohibited; and
 - (d) the privacy rights of all individuals associated with the Company are to be respected.

Gifts and entertainment

23. All business entertainment received or provided is to be reasonable and properly authorised. Gifts that are not in cash or equivalent, are of small value and are appropriate to the business relationship may be accepted. Personnel must not under any circumstances make offers of, or receive, bribes or other improper payments.

Breaches

24. Personnel are responsible for ensuring that they strictly comply with this Code and must ensure that no breaches of this Code occur.
25. A failure to observe the requirements of this Code may breach the law, the Company's policies and procedures, or both.
26. Any breach of this Code will be referred to the Board for investigation and may result in the Company taking disciplinary action against the offending Personnel.

Reporting breaches

27. Breaches of this Code require immediate attention and Personnel have a duty to report any actual, potential or suspected breach of this Code.
28. Any actual, potential or suspected breach of this Code is to be brought to the attention of the Personnel's immediate supervisor, or if the Personnel's immediate supervisor may be implicated, to a senior executive officer of the Company.
29. The reporting Personnel will be informed of the outcome of the investigation.
30. If reporting to the Personnel's immediate supervisor does not result in satisfactory action or is not considered likely to result in satisfactory action, Personnel may refer the matter to the Managing Director or the Chairman on the Board.

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31. Personnel who, in good faith, make a complaint or report any actual, potential or suspected breach of this Code will not be disadvantaged or prejudiced in the making of such a complaint or report and will be protected from retribution.

Disciplinary action

32. If any breach of this Code is found to have occurred, the Company reserves the right to initiate disciplinary action against the offending Personnel. Such disciplinary action may include (depending on the severity of the breach) reprimand, formal warning, demotion or summary (instant) dismissal of the offending Personnel.
33. Where fellow Personnel are found to be implicated through the investigation, the Company may conduct a further investigation and determine the disciplinary action, if any, that should apply.
34. Where illegal acts are found to have occurred, the Company may refer the matter to the relevant authorities.

Amendments and waivers

35. This Code may only be amended or modified by the Board, in writing.
36. Any waiver of any terms of this Code may only be made by the Board or where authorised to do so by the Board.

Further information

37. Personnel are expected to familiarise themselves with this Code. The Company will publish this Code on the Company's website: www.vikingashanti.com.
38. If you have any questions or need further information on how to comply with this Code, please contact the Company Secretary.