



ILUKA

Code of Conduct

Iluka's objective is to create and deliver value for shareholders. This objective is supported by values that are centered on Commitment, Integrity and Responsibility. Underpinned by our values, Iluka's Code of Conduct specifies standards of behaviour for all employees and contractors. By applying these standards, we protect and enhance Iluka's reputation as a company of integrity. It is important that all employees understand these standards of behaviour and apply them to all business practices.

We will:

- act with integrity and professionalism and advance the best interests of Iluka at all times in the performance of our duties;
- comply fully with all relevant laws and regulations governing company business activities;
- observe the rule and intent of all company policies, standards and charters, including the area of environment, health and safety, corporate governance, finance and risk, human resources, and information technology;
- act fairly and be honest, open and accountable in all dealings with internal and external parties;
- maintain the confidentiality of Iluka business information and that of its employees, customers and suppliers;
- avoid conflicts of interest and communicate any potential or apparent conflicts of interest to the company;
- maintain complete and accurate company records;
- not make improper use of company resources or information;
- demonstrate the company's values; and
- treat each other with respect.

A breach of the Iluka Code of Conduct may give rise to disciplinary action. If you become aware of a breach, or potential breach, it is your obligation to bring it to the attention of a manager, contact officer or someone within the People team.

Any queries about the application of the Iluka Code of Conduct should be directed to your manager.

Tom O'Leary
Managing Director

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