

SUPPLY NETWORK GROUP PRIVACY POLICY

YOUR PRIVACY IS IMPORTANT

Supply Network Limited and its subsidiaries (**SNL**) respect your privacy. All our staff are required to read this policy and understand their responsibilities when dealing with personal information. This policy is designed to comply with both Australian and New Zealand law.

In this policy:

Multispares means Multispares Limited or Multispares NZ Limited, each a wholly owned subsidiary of Supply Network Limited, as appropriate to the context;

Globac means Globac Limited, a wholly owned subsidiary of Supply Network Limited

Australian Act means the Privacy Act 1988 (Australia)

New Zealand Act means the Privacy Act 1993 (New Zealand)

IPPs means the Information Privacy Principles in the New Zealand Act;

NPPs means the National Privacy Principles in the Australian Act;

personal information means:

- under the Australian Act, any information or an opinion whether true or not, from which an individual's identity is apparent, or can reasonably be ascertained;

- under the New Zealand Act, any information about an identifiable individual; and

sensitive information refers to information about a person's racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, trade and professional memberships, sexual preferences or practices, criminal record or health information; and

references to "our" website means the websites available from www.supplynetwork.com.au, www.multispares.com.au, www.multispares.co.nz and www.globac.com.au.

SUPPLY NETWORK

Supply Network Limited is the listed holding company of a group of related entities dealing in the importation, distribution and sale of components to the road transport industry. Each of these subsidiaries operates as an independent company with its own management team and its own market focus. Supply Network's interests are based in the Australian and New Zealand markets where the subsidiaries already have a significant presence. It seeks to add value to its subsidiaries by supporting management process, providing appropriate financial resource and leveraging information technology investments. By networking separate business units each with a different focus Supply Network aims to improve service levels and lower the cost of components to the industry.

MULTISPARES

Multispares has been importing and distributing truck and bus parts in Australia for more than 25 years, and in 1987 was listed on the Australian Stock Exchange. It operates in Australia and New Zealand, and has grown to be Australasia's largest independent supplier for the European and Japanese marques.

GLOBAC

Globac is a specialist supplier of brake and clutch friction, foundation and control products. It supplies these products to resellers only; selecting its partners based on their professionalism, market position and distribution offering. It has exclusive distribution rights in Australia and New Zealand for the hvb, lkw bremsse and Aoki brands and has access to a broad base of global suppliers on a competitive but non-exclusive basis. Products are sourced from leading ISO 9001 accredited suppliers and are suitable for both original equipment and aftermarket applications.

OUR PRIVACY PRINCIPLES

In Australia, SNL is bound by the NPPs. In New Zealand SNL is bound by the IPPs.

SNL has adopted internal policies and procedures to ensure that your personal information is dealt with in accordance with both the Australian Act and the New Zealand Act as appropriate. You can see the full text of the NPPs and the IPPs online at www.privacy.gov.au and www.privacy.org.nz respectively.

COLLECTION

We may need to collect personal information about you and others including names, addresses, phone numbers and other contact details. We may also collect details of the age, sex, hobbies and other personal information about you or others.

We need to collect personal information so we are able to:

- identify our customers and potential customers, and their authorised representatives;
- inform our customers and potential customers, and their authorised representatives, of marketing initiatives we think may be of interest to them;
- provide goods, services or other benefits to be offered to customers;
- conduct our business and manage our staff and other resources in a professional and efficient manner;
- develop and implement initiatives to improve our products and services.

If we are not provided with all the personal information we request, we may be unable to do business with you or others.

Where possible we will collect personal information directly from the individual concerned. However, an individual's representatives may hold personal information (eg, financial or bank account details or a credit reference) that we may need to access for particular dealings or other purposes. Where we are at liberty to do so, we will use our best endeavours to seek an individual's consent before obtaining their personal information from third parties. Personal information may be collected by us when:

- we are contacted about our products and services, in person, over the telephone or over the Internet;
- we negotiate and enter into business transactions;
- we provide products and services;
- we receive an application for employment (in which case we will usually retain the information for up to 12 months, and may use it to contact the applicant in that period in relation to potential employment with SNL); or
- we respond to an inquiry, where we consider personal details are required or appropriate to fulfil the query.

Personal information will usually be recorded or up-dated in our records, each time we have contact with or from the individual concerned.

Any additional purpose for the collection (not included in this policy) will be identified when we collect personal information, or as soon as practicable afterwards.

Sensitive Information

We generally do not need to collect "sensitive information" (as defined in the Australian Act) about individuals, however we will collect such information from applicants for employment with us. Where we are at liberty to do so, and it is practicable to do so, we will seek the consent of the individual concerned before collecting their sensitive information and inform them of the purpose at the same time.

USE

We are authorised under this policy to use personal information:

- to identify individuals and protect them from unauthorised access to their personal information, accounts or services in our control;

- to improve our services to you or others;
- to inform you or others of our marketing initiatives and product offerings;
- conduct our business and manage our staff and other resources in a professional and efficient manner;
- to derive or aggregate anonymous information from which individuals cannot be identified;
- to prevent or lessen a threat to a person's life or health;
- where disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim;
- for the purpose for which it was collected, or for a related purpose (or a directly related purpose in the case of sensitive information) that the individual concerned would reasonably expect from us, or to transfer our database or part to a purchaser or licensee of our business or a part; and
- for other purposes permitted, required or authorised by or under law.

DISCLOSURE

We use third party mailing/fax/email providers to help us to distribute promotional, marketing and advertising materials; third party couriers and freight handlers to help us deliver goods to our customers; and third party share registry providers to help us maintain our share registry and deal with shareholder communications. Except where otherwise indicated, we will not disclose personal information to a third party unless:

- the disclosure is for a primary purpose for which the information was collected;
- the individual concerned has consented to the disclosure;
- the third party is our agent or contractor, in which case we will require them to disclose and to use the personal information only for the purpose for which it was disclosed;
- there are reasonable grounds to believe that disclosure is necessary to prevent or lessen a threat to your life or health or that of another person;
- the disclosure is to a related body corporate of SNL or a potential purchaser of a business;
- the disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- the disclosure is permitted, required or authorised by or under law.

OUR WEBSITE

To ensure we are meeting the needs and wants of our website users, and to develop our online services, we may collect aggregated information by using cookies.

Cookies are unique identification numbers like tags that are placed on the browser of our website users. The cookies do not in themselves identify users personally, but are linked back to a database record about them.

We may use cookies to track use of our web site, and to compile statistics on visits to the site in an aggregated form and log anonymous information such as:

- the address of a user's server;
- a user's top level domain (such as .com. or .au);
- the date and time of a user's visit;
- the pages a user accessed and downloaded;
- the search engine a user used;
- what type of browser was used.

When a user visits our site a cookie may be placed on their machine. Where a user has visited us before the cookie may be read each time they re-visit the site.

We do not use this technology to access any other personal information of a user in our records and a user cannot be personally identified from a cookie.

If a user chooses not to have their browser accept cookies from our site, they will still be able to view the text on their screens.

MARKETING

We may use personal information to advise the individual concerned of new services and marketing initiatives that we think may be of interest to them. This may include special product offerings, sale brochures, catalogues and general information about SNL.

Those who prefer not to receive information about our products or services can contact our Privacy Officer in their country to be removed from the relevant circulation list. Contact details for our Privacy Officers in Australia and New Zealand appear at the end of this policy.

We never disclose personal information to a party outside the SNL group for the purposes of allowing them to direct market their products or service on an individual, unless that individual has expressly consented to that kind of disclosure.

We may require written confirmation of a request to be removed from our circulation list.

CORRECTION OF RECORDS

We ask that you tell us of any changes to the personal information we hold about you. We can be notified at any time to update personal information or to be told that the personal information we hold about you is inaccurate or incomplete. We will then take reasonable steps to correct the information in the manner requested. If the New Zealand Act applies to your personal information we will advise you that the correction has been made.

If we consider that the personal information we retain does not require amendment, then:

- If the Australian Act applies to your personal information, we will note your request to correct your personal information on our files; and
- If the New Zealand Act applies to your personal information, we will attach to your personal information a statement that correction was sought but not made.

SECURITY

The protection of personal information is a priority for SNL.

We are committed to maintaining:

- safeguards to protect personal information against unauthorised use, disclosure, access, alteration, destruction and accidental loss. All personal information we hold is dealt with in accordance with the NPPs or IPPs (as the case may be);
- industry standards for the security and protection of information. Personal information is stored securely and access is restricted to authorised personnel only. Our computer systems require access passwords, and these are kept secure by our personnel; and
- internal policies on management of personal information, and staff training to ensure compliance with these policies. All our staff are required to read this policy and understand their responsibilities in relation to personal information.

ACCESS TO PERSONAL INFORMATION

We will generally allow an individual access to any personal information that we hold about them on request - subject to any Restrictions on Access. We will try to give the individual concerned access in a form and manner that suits their needs.

Contact our Privacy Officer in your country if you wish to request access to your personal information in our records. Contact details for our Privacy Officers in Australia and New Zealand appear at the end of this policy.

RESTRICTIONS ON ACCESS

You may not be allowed access to personal information we hold where access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process. Instead, we may give you an explanation for the decision, rather than direct access to the information.

If we have given you such an explanation and you believe that direct access to the evaluative information is necessary to provide a reasonable explanation of the reasons for the decision, we will, at your request, review the decision. Personnel other than the original decision-maker will conduct the review.

Wherever direct access by you is impractical or inappropriate, we should consider together whether the use of a mutually agreed intermediary would allow sufficient access to meet both our needs and concerns.

Other instances where it may not be appropriate to provide you with access to the personal information we hold, include where:

- providing access would pose a serious and imminent threat to the life or health of any individual;
- providing access would have an unreasonable impact upon the privacy of others;
- the request for access is frivolous or vexatious;
- the information relates to an anticipated or existing legal dispute and disclosure would compromise our position or the position of others.

CHARGES FOR ACCESS

An individual will incur no charges for lodging a request to access personal information. However, we may levy a reasonable charge for providing the access. We will provide an estimate of any charge on request, or if it appears to us that the work will be onerous or otherwise warrants a charge.

OVERSEAS TRANSFER AND DATA STORAGE

SNL stores some personal information obtained in New Zealand within New Zealand at our branch premises at Wellington, and outside New Zealand at our corporate headquarters at Guildford, NSW, Australia.

We may transfer personal information overseas, for example:

- for the purposes of data storage;
- to integrate personal information with information obtained by other companies in the SNL group;
- to give effect to a request to open a new customer account; or
- to amend existing accounts.

Except as otherwise indicated in this policy, we will not otherwise transfer your personal information outside Australia (where your personal information is collected in Australia) or outside New Zealand (where your personal information is collected in New Zealand) unless:

- we reasonably believe that the recipient of the information is subject to legal obligations that uphold principles for the protection and fair handling of personal information that are substantially similar to the principles contained in the NPPs or IPPs (as the case may be) and this policy;
- we are given consent by the individual concerned to do so, expressly or by implication;
- we are contractually required to do so; or
- the transfer is for the benefit of the individual concerned and it is not practicable for us to obtain their consent and if they were able to grant consent, they would be likely to give it. In this instance we will advise the individual concerned to whom their information has been disclosed as soon as practicable.

CHANGES TO THIS POLICY

We may update or change this policy when and as we consider appropriate. When we do so, we will publish the current policy on our web site.

If you have any suggestions or concerns that are not addressed in this privacy policy, please contact our Privacy Officer in your country. Contact details for our Privacy Officers in Australia

and New Zealand appear at the end of this policy.

COMPLAINT RESOLUTION

We are committed to constantly improving our procedures so that personal information is treated appropriately. If you feel that we have failed to deal with your personal information in accordance with the NPPs, the IPPs or this policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction. The person to contact is our Privacy Officer in your country, whose contact details appear at the end of this policy.

Our Privacy Officer will manage the following process for us to:

- listen to your concerns and grievances regarding our handling of personal information;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

If this process does not result in an outcome that is satisfactory to you, you may contact the Australian Privacy Commissioner's Office (where the Australian Act applies to your personal information) and the New Zealand Privacy Commissioner's Office (where the New Zealand Act applies to your personal information). Where appropriate, we will work together with the relevant Privacy Commissioner's Office to resolve the issues between us. Further information about privacy and your rights in Australia can be obtained at the Australian Privacy Commissioner's website at www.privacy.gov.au. Further information about privacy and your rights in New Zealand can be obtained at the New Zealand Privacy Commissioner's website at www.privacy.org.nz.

The contact details for the Australian Privacy Commissioner's Office are as follows:

Street address: Level 8, Piccadilly Tower, 133 Castlereagh Street Sydney NSW 2000.
 Telephone 1300 363 992 (for the cost of a local call anywhere in Australia)
 TTY 1800 620 241
 Post GPO Box 5218, Sydney NSW 1042
 Facsimile +61 2 9284 9666
 E-mail privacy@privacy.gov.au

The contact details for the New Zealand Privacy Commissioner's Office are as follows:

Telephone +64 09 302 8655 or 0800 803 909
 Post PO Box 466, Auckland
 Facsimile +64 09 302 2305
 E-mail privacy@actrix.gen.nz (Wellington) or privacy@iprolink.co.nz (Auckland)

CONTACT INFORMATION

If you wish to access any personal information that we hold about you, have a query about this policy, or would like to meet with our Privacy Officer to pursue any question, comment or concern, please contact our Privacy Officer in Australia as follows:

E-MAIL

privacy@supplynetwork.com.au

TELEPHONE

+61 2 9892 3888

ORDINARY MAIL

Privacy Officer
 Supply Network Limited
 PO Box 460
 FAIRFIELD NSW 2165

FAX

+ 61 2 9892 2399