



PACIFICENERGY

Code of Conduct Policy



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1.0 Introduction

1.1 Definitions

Employees	All staff, contractors, consultants and temporary workers of the Pacific Energy group of companies (Group).
Manager	An individual employee's direct supervisor/manager
CEO	Chief Executive Officer
Code	Code of Conduct Policy

1.2 General Statement of Policy

This Code specifies the standards of behaviour required by employees in the performance of their duties. In general terms the following principles are a guide for employee behaviour:

- to act with integrity and professionalism in the performance of their duties and in the proper use of the Group's information, funds, equipment and facilities;
- to exercise fairness, respect, objectivity and consideration in all their dealings in the course of carrying out their duties; and
- to avoid real, apparent or perceived conflicts of interest.

The Code supplements the formal policies and procedures of the Group, which employees are also required to adhere to in the conduct of their roles.

1.3 Purpose

The Group is dedicated to delivering exceptional performance for clients and employees. The Group aims to be the leader in its field while operating transparently, honestly, with integrity and responsibility. The Group will conduct its business ethically and in accordance with the standards set out in this Code.

The Group's employees are key to the overall success of the organisation and are its most important resource. The Group is committed to providing a safe and healthy work environment that promotes consultation and participation at every level, keeping employees informed of the Group's activities. The Group will ensure all employees are treated in a fair and honest manner free of harassment, bullying, hostility and offensive behaviour.

The Group is committed to protecting the integrity of its financial reporting and promotes a structure of review and authorisation designed to ensure the truthful and accurate presentation of its financial position. The Group will prepare and maintain its accounts fairly and accurately in accordance with accounting and financial reporting standards that represent the laws and regulations of the country in which the Group conducts its business.

Employees have an obligation to deal with the Group's clients in a fair and responsible manner. Each employee will assist the Group in delivering superior service and product quality to all clients. The Group regards ethics, honesty and clear communication as the foundations of its reputation, which enables the Group to build successful and long-term business relationships.

1.4 Scope

It is the responsibility of the Group employees to comply with this policy.

This policy applies to all Group employees, contractors and visitors.

2.0 Responsibilities

2.1 Employees

Employees are expected to:

- undertake their duties with honesty, care and diligence, using authority in a fair and equitable manner;
- abide by policies and procedures, instructions and lawful directions that relate to their employment and duties;
- ensure that they take all reasonable care to ensure their own safety and health while at work and to avoid adversely affecting the safety and health of others;
- to comply with all anti-discrimination and equal opportunity laws in the course of their duties;
- treat people they deal with in the course of their employment with respect, decency and courtesy;
- behave in a manner that maintains or enhances the reputation of the Group;
- ensure dress and appearance is appropriate for the performance of their duties, including wearing personal protective equipment where provided or where safety standards specify; and
- comply with the laws and regulations that govern our business and activities.

3.0 Conflicts of Interest

Employees must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group.

Any interest which may constitute a conflict of interest must be promptly disclosed to an appropriate manager.

Accepting any external appointment, such as a board appointment, working for another organisation, or conducting a business that detracts from an employee's ability to fulfill their specified role for the Group is not permitted without the permission of the CEO.

4.0 Confidentiality

Employees must not disclose any commercially sensitive or confidential information that they obtain through their employment with the Group. This includes information about clients or their projects. If unsure, employees must discuss the matter with their Manager.

Information obtained at work or held in the Group's records, must not be used to obtain financial reward or any other benefit, or to take advantage of another person. All documentation stored, in any form, relating to the employee's work or the business of the Group is the property of the Group unless otherwise agreed.

On termination of employment with the Group, no documentation or information relating to the employee's work or to the business of the Group is to be removed for any reason.

5.0 Company Property

Group property, funds, facilities and services must be used only for authorised purposes.

Unless governed by law or otherwise agreed in writing, any intellectual property developed by an employee during or as a result of their employment by the Group is the sole property of the Group.

6.0 Public Statements

The Group's relationships with the media and the investment community are conducted exclusively by the CEO or Chairman or as delegated by them.

7.0 Safety

Employees must observe and comply with all safety practices and procedures introduced by the Group to maintain a safe workplace.

Unsafe work practices must be reported to the immediate manager.

Group equipment is to be maintained in a safe operating condition.

Protective equipment supplied by the Group must be correctly used at all times by employees.

8.0 Environment

Employees must comply with relevant legislation and promote environmental awareness, to raise standards.

Employees must comply with the Group Environment Policy and environmental policies of clients.

Employees are to use energy and other resources efficiently.

Employees are encouraged to support community activities in the areas in which they work.

9.0 Gifts and Entertainment

Employees, from time to time, entertain or are entertained, and give or receive gifts in the course of their duties.

Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced by the gift, or give rise to the perception that the transaction may be influenced by the gift.

Employees involved in a tendering process must refrain from actions which may give rise to an expectation of some favoured treatment from or by any tendering party.

Under no circumstances must employees offer or accept money.

Bribing, or attempting to bribe, a foreign public official (even outside Australia) is a serious crime under Australian law with harsh maximum penalties (including imprisonment for individuals involved). The Group may also be liable for breaches by employees. The definitions of “foreign public official” and “bribe” are very broad. Employees must ensure that they do not participate in any conduct which may directly or indirectly provide any benefit or advantage to a foreign public official where such benefit is not legitimately due or is intended to influence the foreign public official.

10.0 Communications

The Group issues applicable employees with computer equipment and accessories required to effectively perform their duties, and also provide required technical assistance. The equipment and related software assigned to employees’ remains the property of the Group and shall be used in accordance with the IT conditions of use (refer to Induction Process). By using such equipment employees agree to comply with these conditions.

The Group expects these resources to be used appropriately. Accessing illegal or offensive websites (including sites of a pornographic or racial/ethnic nature) is prohibited, and employees must not transmit illegal, offensive or defamatory emails. The downloading of unauthorised software or the transgression of Group software licenses is strictly prohibited as this is a breach of international copyright laws. Employees are provided the IT conditions of use at the time of employment and failure to comply with these conditions will result in their system access being restricted or disabled and, in some cases, disciplinary action being taken.

11.0 Compliance

Employees must be aware of, and adhere to, company policies, especially those relating to health and safety, equal opportunity, privacy and continuous disclosure.

In the course of their duties, employees must comply with relevant laws and regulations of the country in which they work.

12.0 Privacy

Employees and the Group must comply strictly with the privacy principles of the Privacy Act.

Private information about a co-worker, supplier, customer or any other person dealing with the Group must not be discussed without prior written consent.

13.0 Breaches of the Code

Employees have a duty to observe the code and ensure that no breaches occur. Breaches require immediate attention and employees have a duty to report known or suspected breaches of the code.

A complaint or disclosure about an alleged breach of the code should be in writing and contain details about the date, time and nature of the alleged breach and include any available support material. All reports are treated as confidential.

In accordance with the Group’s Whistleblower Policy the Group will protect any “whistleblower” who reports a violation in good faith and on reasonable grounds and will comply with laws relating

to “whistleblower protection”. Please refer to the Group’s Whistleblower Policy for further information relating to reportable conduct.

14.0 Policy Implementation

14.1 Breach of this Policy

Failure to comply with the principles of this policy could result in appropriate disciplinary actions, including termination. Additionally, individuals may be subject to loss of Group access and privileges.

14.2 Policy Review

The CEO will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

This policy may be amended at any time.

14.3 Dissemination of Policy

A copy of this policy will be provided to each employee upon commencement of employment and additional copies will be made available upon request.

14.4 Related Documents

14.4.1 Legislation

- (i) Age Discrimination Act 2004 (Cth)
- (ii) Australian Human Rights Commission Act 1986 (Cth)
- (iii) Disability Discrimination Act 1992 (Cth)
- (iv) Disability Services Act 1993 (WA)
- (v) Equal Opportunity Act 1984 (WA)
- (vi) Occupational Safety and Health Act 1984 (WA)
- (vii) Racial Discrimination Act 1975 (Cth)
- (viii) Sex Discrimination Act 1984 (Cth)
- (ix) Gender Reassignment Act 2000 (WA)
- (x) Workplace Gender Equality Act 2012 (Cth)
- (xi) Racial Hatred Act 1995 (Cth)
- (xii) Fair Work Act 2009 (Cth)

14.4.2 Related Policies

- (i) Grievances and Disputes Policy
- (ii) Workplace Bullying and Harassment Policy

A handwritten signature in blue ink, appearing to read 'Jamie Cullen', with a small horizontal line extending from the end.

Jamie Cullen
Group CEO
12 February 2020