



CODE OF CONDUCT POLICY



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1. INTRODUCTION

1.1 Definitions

Personnel	All employees, contractors, consultants, and visitors of the Pacific Energy group of companies (the Group).
Employees	Any person with a direct employment relationship with the Group and therefore paid by the Group either through wages or salary.
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 purpose of this Code is to ensure as best as possible, the Group and all its employees conduct themselves with integrity and ethically. Each employee should apply the principles of the Code to relationships with each other, their employer and with all those with whom deal in our work for the Group.

This Code is a guide for the way we operate.

1.4 Scope

This Code applies to all Group personnel.

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

2. GROUP COMMITMENT

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.

2.1 Group Commitment to Employees

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.

2.2 Group Commitment to Clients

The Group's success is tied directly to the accomplishments of its clients.

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.

2.3 Group Commitment to Suppliers

Suppliers are essential to the growth, development, and success of the Group.

A relationship with our suppliers is based on mutual trust and confidence and is of vital importance to the Group. The conduct of our employees toward suppliers must always support and build upon this value.

3. RESPONSIBILITIES

3.1 Executive

Approval of this Code.

Ensuring that this Code is applied at all times, in all circumstances.

3.2 Employees

Employees, including Managers, 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, fairness, decency and courtesy;
- behave in a manner that maintains or enhances the reputation of the Group;
- avoid actual or apparent conflicts of interest, and promptly disclose to the Group CEO or Company Secretary any potential conflicts of interest;
- 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.

4. CONFLICTS OF INTEREST

The Group expects that employees will perform their duties conscientiously, honestly and in accordance with the best interests of the Company. Employees must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group.

In general, a conflict of interest exists in any situation in which an employee uses their position at the Group for personal gain or benefit, whether directly or through a relative or associate. Some conflicts are obvious. Many situations are, however, less clear-cut.

For that reason, the emphasis of the Group is on full disclosure by the employee to the Group CEO or Company Secretary of all circumstances that could conceivably be construed as a conflict of interest. The Group will record any disclosure on the Group Conflict of Interest Register.

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.

5. CONFIDENTIALITY

Employees must not disclose to any outside person 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. Similarly, employees must respect the confidentiality of information received from customers and suppliers.

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.

6. COMPANY PROPERTY

Group property, funds, facilities and services must be used only for authorised purposes. Employees are responsible for the proper use, reasonable care and security of Group property and information entrusted to them. Employees should be able to account for such equipment at all times in accordance with established procedures.

Property and information of the Group must not be misappropriated for personal use. Employees should not make any significant use of Company property, information or facilities for their own personal benefit or 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. Patents, rights or copyright, as appropriate, developed in the course of an employee's employment must be assigned to the Group.

Other than in the ordinary course of business, no employee has the authority to dispose of Group property to any individual, company or organisation without prior permission, in writing from their Manager.

If an employee has any doubts as to the acceptability of their intended actions, they should check with their Manager.

7. 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. In the case of telephone inquiries, employees should obtain the name, agency, address, and telephone number of the representative making the inquiry, and immediately report it to their Manager.

Employees are prohibited from participating in social media forums, internet chat rooms or newsgroup discussions on matters pertaining to the Group's activities. Employees who encounter a discussion pertaining to the Group should advise management immediately, so the discussion can be monitored. This does not apply to those platforms that are endorsed by the Group and are part of the way the Group communicates with its personnel.

8. SAFETY

The Group believes everyone has a right to return home safely every day. Each employee has a personal responsibility to take all reasonable precautions in every activity, not just to ensure their own personal safety, but also to avoid harming others.

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 an employee's 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.

9. 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.

10. COMMUNITY

The Group understands that, wherever we operate, we potentially impact the local community.

We are committed to building relationships and working collaboratively with the communities in which we work.

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

11. 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.

Any gift offered to an employee of over \$250 in value must not be accepted without the express authority of the Group CEO.

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.

12. SPONSORSHIPS AND CHARITABLE DONATIONS

The Group may support local community groups and charities through sponsorships and donations that are legal, ethical and further the interests of the Group.

When considering sponsorship and donations, employees must comply with the Group Delegations of Authority.

The Group is politically neutral. It makes no political contributions and will not align itself with any political party.

13. ELECTRONIC 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 should be aware that the Group occasionally monitors employees' emails to ensure compliance with the foregoing.

The Group expects employees to ensure that their communication and interaction with others, during the course of their employment with the Group, through any medium, is appropriate at all times.

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.

14. 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, at all times, with relevant laws and regulations of the country in which they work. Non-compliance with the law can lead to disciplinary action, up to and including termination of employment.

15. 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.

16. COMPLIANCE WITH THE CODE

The Group expects every employee to adhere to the standards described in this Code and, wherever applicable, the standards described in more detailed policies, procedures and legislation.

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 to their manager. Should an employee desire greater anonymity, the employee may contact Human Resources for further investigation.

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.

17. POLICY IMPLEMENTATION

17.1 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.

17.2 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 will be reviewed annually by 20 December.

17.3 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.

17.4 Related Documents

17.4.1 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)

17.4.2 Related Policies

- (i) Grievances and Disputes Policy
- (ii) Discrimination, Harassment and Bullying Policy



Jamie Cullen
Group CEO

14 September 2021

18. POLICY VERSION CONTROL

Date	Author/Department	Version Number	Change Summary
30/11/2017	M Macaskill	1.0	Original
30/11/2017	J Cullen	1.0	Approved
30/01/2020	M Macaskill	2.0	Reviewed
30/01/2020	J Cullen	2.0	Approved
07/10/2020	J Cullen	3.0	Approved
17/06/2021	M Macaskill	4.0	Reviewed
21/06/2021	J Cullen	4.0	Approved
08/09/2021	M Macaskill	5.0	Reviewed
14/09/2021	J Cullen	5.0	Approved