

Supplier code of **conduct**



How we work with suppliers in a safe, responsible and equitable manner, and in compliance with the law and our corporate values.



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1. INTRODUCTION

1.1 Definitions

Employees All staff, contractors, consultants and temporary workers of the Pacific Energy group of companies (Group).

CEO Chief Executive Officer

1.2 Objective

The Group aims to conduct business in a safe, responsible and equitable manner, in compliance with all applicable laws, regulations and recognised standards consistent with the Group's corporate values.

The Group has embedded these principles as part of its sourcing and procurement processes and seeks to engage in business with suppliers who share these values and adhere to the minimum requirements outlined in this document.

The Group expects all suppliers to comply with reasonable Australian community standards of ethics and business practices including adherence to the Group's Supplier Principles as outlined below.

Compliance with the minimum requirements outlined in each area is a requirement of conducting business with the Group.

1.3 Scope

The principles outlined in this policy apply to all third-party suppliers and contractors engaged to provide goods or services to the Group and its controlled entities, irrespective of the geographical location of their operations.

2. PRINCIPLES

2.1 Corporate Governance and Ethics

Robust corporate governance provides the foundation for professional, responsible and ethical business practices and are central to the Group's approach to business. The Group will favour suppliers who can demonstrate having established a strong governance framework and who have adopted ethical standards.

Suppliers must comply with all applicable laws and regulations on bribery, corruption and prohibited business practices.

Suppliers must conduct business in an ethical, equitable and professional manner and disclose any part of their business operations that may not meet reasonable Australian community standards of ethics and business practices.

2.2 Risk Management

Timely identification of business risk allows for risk mitigation and management and contributes to value creation for the Group and its stakeholders. The Group will favour suppliers with a robust and documented risk management framework covering environmental, social and corporate governance (ESG) risks.

2.3 Workplace Health and Safety (WHS)

A safe, healthy and secure work environment is of paramount importance to the Group. The Group will favour suppliers who share similar values and have policies and programs aimed at promoting a safe, healthy and secure workplace in accordance with all relevant WHS laws and regulations.

Suppliers must comply with the Group's WHS requirements.

2.4 Environmental Management

The Group aims to reduce the direct environmental impact of its operations and that of the activities occurring along its supply chain. The Group will prefer suppliers who act responsibly in managing the environmental impacts of their business operations.

At a minimum, suppliers are expected to:

- Comply with all relevant local and national laws and regulations on environmental management and reporting.
- Strive to reduce environmental harm by maximising the efficient use of natural resources, energy, water and raw materials and minimise pollution (inclusive of greenhouse gases pollutions) and waste.
- Comply with the Group's environmental requirements.

2.5 Community

The Group contributes to community development through a number of initiatives, including direct investment, sponsorships, and strategic partnership with charitable organisations. The Group prefers that its suppliers share similar values in relation to community contribution.

2.6 Supply Chain

The Group wants to do business with suppliers who act against human rights abuses. Suppliers demonstrate this by ensuring that they are aware of, continue to investigate and are not complicit with, human rights abuses or any conduct which constitutes modern slavery under any law (including without limitation slavery, human trafficking, forced marriage, servitude, forced or bonded labour, involuntary or child labour) in their operations or supply chain. Suppliers should also provide information and cooperate with us in conducting our own assessment, management and remediation of modern slavery in our supply chain.

Suppliers must ensure and be able to demonstrate that no original documents are kept from employees, only verified copies to confirm identities. Suppliers must also ensure and be able to demonstrate that state security deposits or recruitment fees to gain employment are prohibited.

To this end, the Group will work with suppliers to ensure they follow our sustainable practices to meet our expectations and those of the community. In particular

- The Group expects its Suppliers and Customers to have similar values to the Company in relation to modern slavery.
- The Group engages with Suppliers and Customers to promote and support anti-slavery practices throughout the Group's supply chain.
- The Group is committed to introducing anti-slavery obligations in all Supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so the Group can gauge the Supplier's ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

3. 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.



Jamie Cullen
Group CEO
07/02/2024

4. ELECTRONIC APPROVAL RECORD

DATE OF AUTHOR	AUTHOR ROLE	NAME
26/05/2020	HR Services Manager	Mandy Macaskill
DATE OF REVIEW	REVIEWER ROLE	NAME
07/02/2024	Chief People, Culture & Sustainability Officer	Kaye Butler
DATE OF APPROVAL	APPROVER ROLE	NAME
07/02/2024	Chief Executive Officer & Managing Director	Jamie Cullen

5. DOCUMENT AMENDMENT RECORD

DATE OF CHANGE	REVISION	CHANGE EFFECTED
07/10/2020	1.0	New document.
23/03/2022	2.0	Updated section 2.6 and formatting.
22/01/2024	3.0	Updated cover page.
07/02/2024	4.0	Updated section 2.6