

# EDL Code of Conduct

## *Our SPIRIT values in action*

Wherever we are working in the world, EDL people live and breathe our **SPIRIT values**.

Our SPIRIT values are the foundation for EDL's Code of Conduct, driving our behaviours as we do our jobs and interact with each other, our customers, communities and stakeholders.

Our Code of Conduct demonstrates our SPIRIT values in action.



**Safety,  
health &  
environment**



**Performance**



**Innovation &  
initiative**



**Respect &  
responsibility**



**Integrity**



**Teamwork**

## **Our Code of Conduct**

This Code applies to all EDL employees, employee-like contractors and directors, who are referred to collectively in this document as "employees", "EDL people" or "we".

The intent of the Code is to guide EDL people in performing our jobs and roles by:

- describing the conduct and the standards of behaviour expected of all EDL people
- providing a framework on how work-related decisions should be made and implemented (although it is not meant to be prescriptive of every situation an employee may find themselves in).

## **Compliance**

It is imperative that EDL and EDL people observe the laws and regulations that apply to our business, both in letter and in spirit.

- EDL is committed to complying with the spirit and letter of all relevant laws, rules and regulations in the jurisdictions within which we operate.
- Consistent with this, we must comply with the spirit and letter of all relevant laws, rules and regulations in the jurisdictions where EDL operates.
- We are also expected to understand the laws, rules and regulations relevant to our work.

## Conflicts

EDL people must avoid conflicts of interest, and should report any potential conflicts to EDL. EDL expects that employees do not:

- exploit our position with EDL for personal gain
- have a significant ownership interest in any enterprise that may compromise loyalty to EDL
- act in ways that may disparage EDL.

We have a duty to bring to the attention of EDL, any business opportunities identified through the use of EDL's assets, property, information or position.

## Fair dealing

EDL is committed to the highest standards of ethical business conduct. All dealings with EDL's customers, suppliers, competitors, employees and other stakeholders are to be conducted on fair and reasonable terms.

EDL expects employees to deal ethically and professionally with external individuals and organisations, and to ensure other employees do likewise.

## EDL's assets or property

EDL people must use EDL assets or property properly in the interests of EDL, and protect and safeguard these assets or property from loss and misuse.

We must immediately report suspected incidents of fraud or theft for investigation. These requirements continue after an employee leaves EDL.

## Confidential information

EDL people are to maintain the confidentiality of all confidential, trade secret, and proprietary information relating to EDL or EDL's customers or suppliers, except when disclosure is authorised or required by law or regulation.

These requirements also continue after an employee leaves EDL.

## Employment practices

EDL strives to make our company a great place to work, and is committed to ensuring:

- all employment practices are fair and non-discriminatory
- a safe system of work is maintained
- occupational health and safety obligations and good practices are met, including continually striving for ZERO Harm
- environmental obligations and good practices are recognised and respected
- the privacy rights of all individuals associated with EDL are respected
- harassment and bullying are not tolerated at work.

## Gifts, benefits and entertainment

EDL people may, from time to time, entertain or be entertained, and may give or receive benefits or gifts in the course of our duties.

All business benefits, gifts and entertainment received or provided (collectively "gifts") are to be reasonable and properly authorised under the following guidelines:

- Gifts may only be accepted that are not in cash or equivalent, where they are of small value, and where they are reasonably appropriate to the business relationship.
- 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 or similar are to refrain from offering gifts or taking any other actions that may give rise to an expectation of some favoured treatment from or by any tendering or other third party\*.
- Under no circumstances should we accept or offer cash, money or similar.\*

\*See the next section: *Bribery and Corruption*

## Bribery and corruption

EDL prohibits employees from giving or receiving any bribe, commission or similar inducement to a third party, including a government or public official.

It is likely that such action is unlawful, and if so, exposes the employee, and potentially EDL, to criminal prosecution. In each jurisdiction where EDL operates, there are laws that prohibit payments to public officials and such behaviour may be regarded as corrupt practice.

Any request for a gratuity or monetary or non-monetary payment to secure or expedite performance of an action, must be immediately reported to the EDL Company Secretary or legal counsel.

## Fraud

EDL has zero tolerance for fraud. Acts of fraud are not only unlawful, but expose the employee, and EDL, to potential criminal prosecution.

Fraud is when a person or group dishonestly obtains or seeks to obtain a benefit, or causes a loss, by deception, unauthorised business dealing or other means.

For example, stealing from EDL, whether using a company credit card for personal expenses, or siphoning money from EDL's bank account, is fraud. Hiding unauthorised business dealings with accounting tricks is also fraud.

## Reporting

Any circumstance that an employee believes, in good faith, to be a breach of a law or this Code, is to be brought to the attention of the employee's supervisor, who is in turn responsible for contacting senior management or the Company Secretary for guidance.

Any person reporting such breaches will be protected from retribution (where not implicated in such breaches).



If reporting to a supervisor does not result in satisfactory action, or is not considered likely to result in satisfactory action, the employee may report suspected breaches to the Chief Executive Officer, Chair of the Audit Committee or Chair of the Board.

The Chief Executive Officer is responsible for periodic reports to the Board on the operation and effectiveness of this Code.

Employees are also referred to the EDL Whistleblower Policy and the KPMG FairCall whistleblower hotline\*\*.

### **Breach of the Code**

EDL considers a breach of this Code to be a serious matter.

A breach of this Code may result in EDL taking disciplinary action against an employee, up to and including termination of employment.

Note: Other EDL policies also apply to employees and may also cover some of the matters set out in this Code

### **Key contacts**

EDL Company Secretary [Legal.Secretary@edlenergy.com](mailto:Legal.Secretary@edlenergy.com)

Employment practices [HR@edlenergy.com](mailto:HR@edlenergy.com)

\*\* [FairCall](#) free 24/7 external hotline and reporting service independently managed and monitored by KPMG as part of the EDL Whistleblower Policy:

- Australia: 1800 550 965
  - Canada: 1844 874 4045
  - United Kingdom: 0808 234 7091
  - USA: 1866 8849 435
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