



# Code of Conduct

A world of  
new energy

**"As a global leader in renewable energy,  
we have a responsibility to ensure we  
operate lawfully and ethically  
in everything we do."**

JAMES HARMAN, CEO





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# Message from our CEO

It's an exciting time for the global energy industry. Never before have we made such strides towards decarbonisation at such a rapid pace. I'm proud that EDL is a major contributor towards this progress; we are creating positive change for our people, our customers, our community and our environment.

As a global leader in renewable energy, we have a responsibility to operate lawfully and ethically in everything we do. EDL sets high standards for what we can achieve, as well as the way we do business.

That's why this Code of Conduct is so important—it sets out the blueprint for how we work and outlines the expectations and responsibilities of EDL's team members.

Our Code of Conduct is guided by our **SPiRiT** Values:

- **S**afety, health and environment;
- **P**erformance;
- **I**nnovation and initiative;
- **R**espect and responsibility;
- **I**ntegrity; and
- **T**eamwork.

If we follow these **SPiRiT** Values as the foundation of our ways of working, and observe this Code of Conduct, we can uphold EDL's reputation and standards.

It is the responsibility of every EDL team member to comply with this Code of Conduct, and to follow these guidelines:

- Carry out work with safety as our first priority, to protect our people and our wellbeing
- Act respectfully towards our colleagues, customers, communities and environment
- Act lawfully, ethically, and with integrity at all times
- Call out and report behaviour which is inconsistent with this Code of Conduct and our **SPiRiT** Values
- Ask for support if you have any questions or concerns

I'm proud of the global EDL team. Together we will create a world of new energy if we stay true to our values and our Code of Conduct.

**James Harman**  
**CEO**













# EDL SPIRIT Values

Wherever we are working in the world, EDL people embody these **SPIRIT** Values. As we strive to achieve our vision, these values are paramount.



**Safety, health & environment**



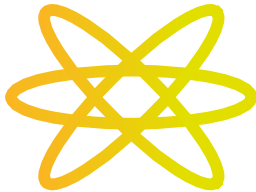
**Performance**



**Respect & responsibility**



**Integrity**



**Innovation & initiative**



**Teamwork**



## The EDL story so far

EDL is proudly headquartered in Brisbane and is a leading global producer of sustainable distributed energy.

We understand, and are prepared for the complexities of a decarbonising energy market, partnering with customers to tailor reliable, cost-effective and sustainable energy solutions.

We own and operate 83 power stations and gas processing plants, across five countries and three continents, generating ~4.5TWh per annum of clean, reliable power.

In Australia, EDL is the market leader in developing and operating remote hybrid renewable microgrids, providing up to 85% renewable power reliably and cost effectively for communities and customers with isolated energy requirements such as mining operations.

We have been powering remote mines for over 30 years and pioneered off-grid, high

penetration (>50%) renewable energy, through our ownership and operations of the highest percentage renewable energy microgrids in WA, SA and the Northern Territory.

In North America, EDL has grown significantly in recent years – investing more than US\$750m, merging two mature US landfill gas to electricity businesses with its existing business; and developing a portfolio of Renewable Natural Gas (RNG) plants, including some of the largest RNG plants in the US.

As a global team at EDL, we are united in our focus on exceeding expectations for energy and decarbonisation targets. We think differently and explore new paths. We're passionate about finding a better way.



# Our Code of Conduct Principles

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 this 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).

Our Code of Conduct is aligned with our **SPiRiT** Values, guided by the following key principles:

1. Prioritising safety, health and wellbeing above all else.
2. Making a positive impact for our customers, our community, and our environment.
3. Acting in accordance with our lawful and ethical obligations.
4. Protecting our people, business and assets.



# People and culture



## HEALTH AND SAFETY

Health and safety is our number one priority. EDL's commitment to health and safety extends beyond the workplace and into everything we do.

At work, the Health and Safety of our people is governed by our HSE Strategic Plan. We strive to continually improve policies and procedures with the aim of achieving a ZERO Harm work environment.



## DIVERSITY, EQUITY AND INCLUSION

At EDL we value diversity. We fundamentally believe that an inclusive and collaborative culture leads to organisational success. We adopt a broad view of diversity, which can include race, ethnicity, gender, sexual orientation, disability, age and physical abilities as well as religious, political or other ideological beliefs.

EDL's commitment to diversity, equity and inclusion extends to all facets of our business and is underpinned by our Diversity, Equity and Inclusion Strategy. We have global and regional Diversity, Equity and Inclusion Committees to progress this strategy.

Everyone at EDL has a role to play in building a diverse and inclusive culture. Employees are expected and required to:

- Value and respect each other's differences.
- Complete all diversity and inclusion training during induction as well as refresher training.
- Speak up about behaviour in the workplace that is not reflective of EDL's Diversity, Equity and Inclusion Strategy.



## HUMAN RIGHTS

It's important to us that every single person involved in the production of EDL's reliable energy solutions - from our employees to our supply chain - has their human rights respected, and is free from exploitation. EDL introduced our Human Rights Policy in 2021, which covers human rights as described in the UN Guiding Principles on Business and Human Rights, including the issue of modern slavery. EDL reports annually on how we mitigate Modern Slavery risks in our business and supply chains.





## RESPECTFUL BEHAVIOUR

EDL is committed to having a safe, diverse and professional work environment. Everyone at EDL has a role to play and we expect all employees to behave professionally, respectfully and appropriately at all times to create a harmonious and healthy work culture.

EDL does not accept behaviour that is disrespectful of others, such as discrimination, harassment (including sexual harassment), bullying or other inappropriate behaviour.

All EDL people are expected and required to:

- Actively contribute to a positive and productive work environment and workplace culture.
- Comply with this Code by behaving respectfully at all times.
- Attempt to resolve any issues informally if appropriate and safe to do so.
- Raise issues with their Manager / Supervisor (or other suitable EDL manager) in a timely manner if unresolved through informal approaches, speak to HR or contact the regional confidential 'whistleblower' services listed on page 17.
- Report observed or reasonably suspected instances of inappropriate or disrespectful behaviour.

This applies to all employees and contractors at EDL sites in all work related activities and in any dealings with EDL colleagues, customers, suppliers, visitors, or any other work-related interactions.

# Supporting our stakeholders

We believe that our own success is dependent on supporting and uplifting our stakeholders. EDL operates with a collaborative approach, working with stakeholders to deliver mutually beneficial outcomes. This includes our customers, our community, and First Nations people.

## CUSTOMERS

EDL's success is only possible in alignment with the success of our customers. We create sustainable energy solutions that help our customers achieve their decarbonisation and environmental compliance goals, without sacrificing the quality or reliability of energy supply.

EDL's Customer Charter commits to providing our customers with quality service and solutions; reliability and innovation to exceed expectations; and is underpinned by the following principles:

1. Work in partnership to create value.
2. Do things better, now and in the future.
3. Deliver on our promises.
4. Actively respond to customer needs.

## COMMUNITY

Contributing to the communities around our operations and beyond is a fundamental part of the way EDL operates. From local-level contributions to schools and not-for-profit groups, through to strategic long-term community partnerships, we seek to identify

community needs and opportunities to collaborate. We also support and encourage our employees across the globe to assist a range of charitable groups through giving time, fundraising activities or donating money, goods or services.

## FIRST NATIONS PEOPLE

At EDL, we have great respect for First Nations people across all continents and communities and seek to build trusting relationships, respect local customs and practices, and create opportunities. In Australia, we engage with Aboriginal and Torres Strait Islander communities for consultation and contribution on projects and have documented this approach in our EDL Reconciliation Action Plan (RAP).

EDL employees in Australia are expected to align with our RAP in the course of their work. We believe this is crucial to closing the gap between Indigenous and non-Indigenous communities, and protecting the culture of Traditional Owners.



# Protecting the environment

We aim to embed sustainability and environmental compliance in all that we do. Sustainability applies not only to our work in delivering renewable energy solutions, but also to improving environmental, social and governance performance across our entire value chain – from new projects, to ongoing operations, to project maintenance and closure.

Globally, EDL is committed to:

- Establishing, maintaining and reviewing procedures, practices, measurable objectives and targets for the prevention of environmental harm.
- Identifying and managing environmental issues associated with our activities.
- Complying with all Federal, State and local environmental laws in the jurisdictions where we operate.
- Continually improving our environmental management systems and processes to enhance environmental performance.



# Laws and governance

EDL operates in alignment with a wide range of laws, rules and regulations globally and expects all employees to adhere to those relevant to their roles and responsibilities.

We use a combination of systems, policies and procedures to meet our requirements. EDL operates ethically and with the highest standards of integrity, particularly with regard to bribery and corruption, gift-giving and receiving and fraud.

## 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 as this behaviour is a corrupt practice.

Any request for a gratuity, 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.

## FAIR DEALING

EDL is committed to high 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 encourage others to do likewise.

## 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.

## CONFLICTS

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

- Exploit their 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. In the United Kingdom, employees have an obligation to report any other paid work to us also.

### **PERSONAL INFORMATION**

EDL employees are to only collect, store, use or disclose personal information about its customers or suppliers in a manner consistent with EDL's Privacy Policy and in accordance with relevant privacy laws. EDL employees are to take all required steps to protect third party personal information in accordance with relevant privacy laws.

### **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 their 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\*.

# Protecting our business and assets

As a growing global business, EDL must always be mindful of protecting our assets including company property, information, hardware and software. We have developed a set of policies for employees to follow in order to protect our business and assets.

## EDL'S ASSETS AND PROPERTY

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

Any suspicion of fraud or theft must be reported immediately for investigation. These requirements continue after an employee leaves EDL.

## CONFIDENTIAL INFORMATION

EDL people are to maintain privacy for all confidential, trade secret, and proprietary information relating to EDL, our customers and suppliers, except when disclosure is authorised or required by law or regulation.

## CYBER SECURITY

EDL's cyber assets include digital technology (e.g. computers, smartphones, hardware, software, IT and OT systems and approved/required assets) and information (e.g. EDL information, customer information, employee personal information, etc. in digital form).

EDL's information and technology assets process, transmit and store important information and must be appropriately safeguarded. Inappropriate use of digital technology or information may expose EDL to risks including malware, security breaches, cyber fraud, theft or loss of property as well as unavailability of EDL's IT or OT networks that could adversely impact the business and operations.

EDL's cyber assets are to be appropriately used and protected by all employees. Below is an overview of the key cyber security policy and procedures that all EDL employees should follow.

- Treat emails and other electronic forms of communication as official records and only use authorised applications to send these messages.
- Use only authorised applications and devices for business communications or to conduct business activities (e.g. do not use unauthorised applications for documenting or agreeing business transactions).
- Return all EDL equipment, digital technology and information assets upon ceasing to be an EDL employee or contractor.
- Immediately report damage, loss or theft of EDL digital technology and information assets (e.g. laptop or device) to your manager as well as EDL's IT Department.
- Notify EDL's IT Department if you've received a suspicious email (e.g. potentially phishing, fake counterparty, etc.).
- Comply with the EDL IT Department's reasonable requests and requirements regarding digital technology usage and cyber security, including remote working obligations.
- Undertake and complete any cyber security training requirements.

All EDL employees are expected and required to promptly report any events, actions or conditions that show or suggest a cyber security breach or incident.

## SOCIAL MEDIA GUIDELINES

EDL employees should use good judgement about placing material on social media, especially where material has the potential to reflect on EDL or EDL employees. When participating in social media in a personal capacity, the legal obligations of employees (as an employee, consultant or contractor etc) to EDL remain the same as they would be in other contexts, even if you believe you are participating anonymously.

EDL expects that employees be aware that content published on social media sites is likely to be in the public domain, and will probably remain there for many years. As such employees are to be aware of and comply with the following:

- where social media behaviour relates to EDL then it is still bound by our SPIRIT values and Code of Conduct even if it takes place outside work hours or away from the workplace
- avoid comments that are obscene, defamatory, threatening, harassing,

discriminatory or hateful about your work, EDL or stakeholders

- comments should not be or be perceived to be:
  - made on behalf of EDL (e.g., content made wearing or using EDL branding could give this appearance)
  - compromising your capacity to fulfil your duties as an EDL employee, a gratuitous personal attack connected with EDL or you being an EDL employee
  - criticism of EDL or EDL Stakeholders, compromising confidence in EDL or disclosing confidential information about EDL or EDL's shareholders.

If you are accessing social media via EDL's internet and intranet systems, you must do so in accordance with the Acceptable Use of Digital Technology Information Assets Policy, which requires you to use these resources reasonably and in a manner that does not interfere with your work and that is not inappropriate or excessively accessed.





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JAMES HARMAN, CEO



# Accountability and reporting

## REPORTING

EDL is required to report our performance to a range of stakeholders including shareholders and regulatory bodies. Many EDL people play an important role in this process through the recording of accurate and reliable data, to ensure we are reporting correctly and complying with reporting requirements.

Any circumstances that an employee believes, in good faith, to be a breach of a law or this Code, are 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.

Employees are to be open and honest in reporting, and are to provide as much information and context as practicable when reporting.

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. EDL also has a free 24/7 external hotline and reporting service, independently managed and monitored by KPMG, as part of the EDL Whistleblower Policy – see below for further details.

## BREACHES

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

If an employee is found to have breached this Code then EDL may take disciplinary action against the employee, up to and including termination of employment.

Note : Other EDL policies (whether or not mentioned in this Code) 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

**Employment Practices** HR@edlenergy.com

**EDL Whistleblower** FairCall free 24/7 external hotline and reporting service independently managed and monitored by KPMG.

- **Website:** <https://www.kpmgfaircall.kpmg.com.au/EDL>.
- **Australia : 1800 550 965**
- **Canada : 1844 874 4045**
- **United Kingdom : 0808 234 7091**
- **USA : 1866 8849 435**



[edlenergy.com](http://edlenergy.com)