

Business Partner Code of Conduct

Approved by BG&E Resources' Audit & Risk Management Committee (ARC)

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1. Purpose

BG&E Resources Pty Ltd (“BGER”) (“the Company”), ABN 94 628 465 056, is an employee-owned, multidisciplinary engineering and ESG advisory consultancy, delivering technical solutions for clients in the Resources, Energy and Industrial sectors. We are united by our purpose – together, we embrace ambition and innovation to solve complex problems, engage communities and transition all to a nature-positive future – and committed to helping clients to decarbonise.

The Company is committed to upholding the highest standards of conduct, ethics and integrity in all aspects of our business practices and relationships.

Our Business Partner Code of Conduct (“Code”) sets out a common framework for how we expect our business partners to behave whenever they conduct business for, on behalf of or in partnership with BGER. You are required to uphold the same or equivalent principles and standards that BGER does.

In addition to local laws and regulations, BGER supports and works actively to comply with international guidelines regarding the environment, human rights, working conditions, anti-corruption, and business ethics, including the United Nations’ (UN’) Universal Declaration of Human Rights.

The governance of this Policy is overseen by the Company’s ARC.

2. Scope

BGER acts with integrity in dealing with others and also expects our Business Partners to respect fundamental values such as human and labour rights, equal treatment, and non-discrimination.

Business Partners shall comply with laws, regulations, and associated requirements applicable to its business and throughout the supply chain, as well as with this Code.

Business partners must not act in a way that could cause BGER to violate laws or regulations or expose the Company to penalties. Any violations of a laws, regulations or non-compliance with this Code may lead to stringent measures, including termination of the business relationship.

In the event of discrepancies between this Code and applicable law, the strictest standard shall apply.

3. Business Conduct

BGER Business Partners must carry out business activities with honesty and transparency. They shall not engage in, nor tolerate, any form of corruption, blackmail, embezzlement, or bribery, whether directly or indirectly.

Business Partners shall:

- Act in accordance with all Australian requirements and legislations as well as internationally recognised standards for bribery and corruption including:
 - The Australian Criminal Code Act 1995 (Cth) – which criminalises corrupt conduct both domestically and internationally.
 - The UN' Convention Against Corruption – the only binding international treaty dealing with corruption.
- Carry out their activities in a manner that safeguards fair and open competition. They must comply with applicable anti-trust and fair competition laws and regulations. They must never enter into discussions or agreements with competitors concerning pricing, market or customer allocation, market sharing, bid-rigging, or other similar activities which could have anti-competitive effects.
- Never accept, request, offer, promise, give or authorise a bribe, kickback, payment, or anything of value (financial or otherwise) to obtain an unfair or improper advantage, retain business or influence another party's actions or decisions.
- Never offer or accept gifts, entertainment, or other business courtesies on behalf of BGER without prior authorisation from BGER.
- Not accept business courtesies of more than modest value, offer cash or cash equivalents or exchange any benefit with a public official or other recipient involved in an active procurement process or that would otherwise appear to reward, preferential treatment or create an obligation. If exchanged, business courtesies must be recorded, auditable and suited to the occasion or roles of those involved.
- Not make facilitation payments on behalf of BGER or for its intended benefit.
- Act in BGER's best interest and must avoid any actual, potential or perceived conflict of interest. We must be notified immediately of any conflict of interest that has arisen or may arise during their business relationship with BGER.

4. Human Rights and Equality

BGER promotes equality, diversity and inclusion and safeguards human rights.

Business Partners must comply with all Australian requirements and legislations as well as internationally recognised human rights and standards.

Business Partners shall:

- Act in accordance with internationally declared human rights and standards, including those expressed in the UN' Human Rights Office of the High Commissioner's International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
- Respect the rights of Aboriginal and Torres Strait Islander people in alignment with the UN' Declaration of Indigenous Peoples.
- Follow the UN' Guiding Principles on Business and Human Rights, Respect, Protect, Remedy framework.
- Support and encourage a diverse and inclusive work environment that is free of harassment and any discriminatory, violent, harsh or inhumane treatment.
- Respect their employees' freedom to associate, form and join organisations and collectively bargain.
- Comply with laws, regulations and industry standards on working hours and wages. Employees of Business Partners should never have to surrender government-issued identification such as Passports as a condition of employment. Moreover, they should be allowed to leave their positions or freely terminate their employment with reasonable notice.
- Offer equal opportunities to their employees, protect them from any form any form of retaliation.
- Not treat or propose to treat a person with an attribute unfavourably because of race, ancestry, ethnicity, Indigenous culture, citizenship, creed, colour, age, physical features, sex, sexual orientation including LGBTIQ+ (lesbian, gay, bisexual, transgender, intersex, questioning), lawful sexual activity, gender identity and expression, physical or mental disability, marital status, family responsibilities, pregnancy, breast feeding, carer responsibilities, religion, political opinion, industrial activity or trade union membership, affiliation, or military status.
- Be open and transparent about their recruitment practices, policies and procedures in relation to modern slavery and take steps that are consistent and proportionate with their sector, size and operational reach.

5. Health, Safety, Environment and Quality (HSEQ)

BGER puts the health, safety and wellbeing of its people, clients and stakeholders first. We treat HSEQ as a priority by actively monitoring, preventing, reducing or removing risks.

Business Partners shall:

- Comply with applicable health, safety and environment laws, regulations and industry requirements.
- Endorse practices that ensure a respectful and safe workplace.
- Protect anyone who accesses a work site or takes part in a business activity. They will implement standard work instructions and provide appropriate personal protective equipment as well as provide training, procedures and inductions or similar guidance.
- Implement a health and safety managing program to drive continual improvement and transparent reporting.
- Protect the environment and adopt policies, procedures and systems to conduct business sustainably.
- Strive to reduce the environmental impact of their activities as well as care about the communities they operate in, respect their Country and heritage, and listen to their concerns.
- Report any health, safety or environment incidents involving or affecting BGER in accordance with local procedures and contracting requirements.

Business Partners are encouraged to:

- Measure, report and reduce their Greenhouse Gas (GHG) emissions.
- Evaluate climate risks and opportunities and implement climate resilience measures.
- Maintain ISO 14001 or equivalent certification.
- Communicate their commitment to environmental responsibility to management, employees and business partners.
- Evaluate environmental performance through appropriate audits and issue progress reports.

6. Reporting Concerns and Violations

BGER's business operations are conducted using a fair, ethical and transparent approach. We encourage an open and honest workplace and promote a no-blame culture. We will not retaliate, persecute, or punish any person in any way who, in good faith, raises any concerns about this Policy or make a notification or report of real or perceived breaches/violations of the Policy provisions.

Employees can report suspected concerns or violations, by:

- contacting or speaking to their Manager;
- contacting or speaking to any of the Directors or Members of the Executive Leadership Team;
- contact or speaking to the Director, Environmental, Social & Governance and Development or the General Manager, Commercial; and
- contacting or speaking to any of Members of the ARC.

Appropriate disciplinary action may be taken against Business Partners found to have breached this Code which may include termination of our relationship.

For further details about the Company's Business Partner Code of Conduct, please contact:

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