

Code of Conduct

Prepared by People & Culture

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Code of Conduct

Our BG&E Resources (BGER) Values are an expression of the way we work, both internally as a team, and externally with our clients and key Stakeholders, and are fundamental to our culture to drive excellence. They underpin the way in which we interact with each other as individuals and as a team, both internally and externally, to inspire and strive for excellence in everything we do.

1.1 Values

Reimagining the what, why, who and how of work, via the following strategies:

Our Core Values

Adaptable



Our people respond effectively to changing demands.

Accountable



Our people hold themselves and others accountable for their behaviours and performance.

Thriving



Our people promote and protect health and safety, enabling us to thrive and flourish.

Empowering



Our people share opportunities and support others to grow and succeed.

Integrity



Our people demonstrate their integrity and uphold organisational values at all times.

1.2 Our Commitment

BG&E Resources is fully committed to conducting its business in an honest and ethical way at all times. We choose to do the right thing in everything we do and will fully support and protect our people and business partners who are acting and conducting themselves in accordance with the principles presented within this Code.

Our commitment to ethical business behaviour means that:

- Compliance with the law is fundamental, even in the face of contrary accepted local business practices or customs.
- We compete fairly for our commissions based on quality, price and innovative services, not by offering improper benefits to others. No BGER representative may directly or indirectly offer, promise, grant or authorise the giving of money or anything else of value to client and government officials to influence official action or obtain improper advantage. Facilitation fees are not acceptable.
- All charitable donations must be transparent and clearly documented including the recipient's identity and confirmation that it was used for the intended purpose. We do not make direct political contributions including donations to politicians, parties or candidates.
- Developing and maintaining client relationships is fundamental to sustainable business. By nature, these relationships can include opportunities for entertainment and gifts. Gifts and entertainment must be sufficiently modest so that it could not be regarded as attempting to create a business obligation. Gifts must also comply with applicable laws and recognised local customs.
- All transactions and payments must be transparent and able to stand the scrutiny of an audit.

- It is expected that our people make business decisions in the best interests of BGER and our clients, and not based on their personal interests. Any potential conflict of interest must be disclosed.
- The safety of our people and those around us is paramount, as is the protection of the environment from harm. We maintain a working environment that is consistent with our core values and legislative requirements. We will not tolerate any abuse of human rights, any form of discrimination, or the use of child labour.
- We foster an open environment where all our people can report any suspected, fraudulent or other improper practice without fear of reprisal.
- We will cooperate fully with external agencies investigating corrupt practices within legal parameters.

1.3 Your Responsibility

As employees of BG&E Resources, we are all collectively and individually responsible for the Company's reputation for excellence, integrity and fairness. Ethical behaviour is integral to the way we conduct our business, and the Company requires all staff to be responsible for conducting themselves appropriately.

- Comply with this Code, BG&E Resources rules, contractual obligations and any local laws or regulations
- Seek to ensure others who may be representing BG&E Resources comply with this Code
- Seek to work with clients, suppliers or partners who operate under standards equivalent to our own, and who demonstrate they use ethical behaviour and practices.
- Seek advice if there is any doubt as to the proper course of action
- Promptly raise any known or suspected breaches of this Code
- Demonstrate leadership and diligence to ensure compliance with this Code

1.4 General Practices

The BG&E Resources Code of Business Conduct Policy is based on three general principles.

1. Prevention – the best solution to achieve proper conduct is to identify the issues or factors that could lead to improper conduct and avoid or mitigate these issues or factors. This is achieved through a strong culture of ethical behaviour and leadership.
2. Monitoring & Detection – BG&E Resources has a monitoring and detection process to identify breaches of this Code. The process includes a culture that encourages and supports the reporting of suspected breaches.
3. Response – if a suspected breach of this Code is reported, it will be promptly investigated, and if sustained, timely and appropriate action will be taken to address the particular issues and to prevent reoccurrence.

Craig Bloxham
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Document Control				
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