

External Communications Policy

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

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Contents

1. Purpose	2
2. Scope	3
3. Definitions	4
4. Policy	5
4.1 Approval Process for External Communications	5
4.2 Crisis Communications	6
4.3 Marketing and Communications	6
5. Reporting Concerns and Violations	7

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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 business standards including with our external communications. This External Communications Policy (“Policy”) aims to:

1. Ensure that our employees, officers, contractors, and service providers understand the guidelines for content and approval process required prior to the release of any BGER branded communications or communication to an external party or parties which may be attributed to us.
2. Minimise the risk of a contractual breach, adverse publicity, damage to BGER’s reputation or damage to stakeholder relationships by ensuring that all external messaging and communication are aligned to our Code of Conduct, policies, values and principles, and reflect our position on the subject matter being communicated.
3. Establish the protocol for handling media enquiries and for providing BGER related information to external parties.

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

2. Scope

This Policy applies to all Company employees, officers and contractors. When we say “we”, “our” or “us” we are referring to everyone at the Company.

When dealing with the media, interacting on any digital communication platforms and publishing or distributing external communications, employees are required to follow the procedures outlined in this Policy prior to the release of information.

BGER has a separate Social Media Policy which sets out your obligations in relation to the use of social media. The Social Media Policy applies in conjunction with this Policy.

3. Definitions

External Communications	<p>Information from BGER transmitted to an audience that is external to the Company.</p> <p>This can take the form of general communications such as: emails, comments/quotes, reports, submissions to Government or regulatory bodies, speeches, presentations, articles, advertisements and advertorials, social media posts and comments, videos, podcasts and animations.</p>
Media	<p>Television, radio and print or digital media, including websites, social media platforms/accounts, specialist and trade publications and internet news services as well as billboards and signage.</p> <p>This includes journalists, photographers and camera operators.</p>
Spokesperson	A person who speaks as a representative of BGER.
Subject Matter Expert	A professional with specific expertise in a particular area or field who is employed or contracted to BGER.
Corporate Information	Knowledge communicated or received concerning BGER's business, clients, stakeholders or projects.
Nominated Approver	BGER person authorised to approve external communications.

4. Policy

This Policy sets out how external communications are managed and approved at BGER. The Nominated Approver – Director, Environmental, Social & Governance and Development – is responsible for authorising external communications on behalf of the Company.

The Marketing and Communications (M&C) team must be consulted at the inception or as soon as possible after the inception of all projects requiring external communication including channels such as:

- media and/or public relations;
- digital communication (e.g. websites, SMS; social media, news services, etc.);
- marketing;
- graphic design;
- community consultation;
- photography, video production and animation creation;
- external websites; and
- signage, promotion, advertising, creative design, marketing, media, photography, video, etc.

4.1 Approval Process for External Communications

- Any content relating to BGER's clients, projects and third parties cannot be published, submitted or presented to any external party without approval from our Nominated Approver and the relevant client or third party.
- Unless you are a Nominated Approver, you must not publish, submit or present communication or content to any external party or express views, opinions or ideas which may be attributed to BGER – including our business, clients, projects, people, contractors, suppliers and other stakeholders (unless stated otherwise as it outlined in the Company's Social Media Policy and in the bullet point below).
- BGER's Nominated Approver may, from time-to-time, allow others to publish, submit, present and/or approve content to be used externally, and on such occasions, other employees must adhere to the guidelines of this policy, BGER's Social Media Policy and our Code of Conduct.
- The Approval Process does not apply to general conversations at external events, functions or workshops, however any comments made on behalf of or in relation to BGER must be in line with our Code of Conduct, values, policies and principles, and reflect the agreed position taken by BGER on the specific subject matter being communicated.

4.1.1 Media Relations

- All media enquiries, national, local or regional and international, must be directed to the Nominated Approver in the first instance. The Nominated Approver will liaise with the key spokesperson for the Company, the Managing Director in regards to the appropriate course of action. In the event that the Managing Director is not available, the delegation of authority is referred to the Technical Director.
- Any commentary relating to BGER's financial or operating results must be authorised by the Nominated Approver, Managing Director or Technical Director.

4.1.2 Material Information

- If you inadvertently disclose any Material Information relating to BGER's business, clients, projects or stakeholders to an external party, you must immediately notify the Nominated Approver. In the event that the Nominated Approver is not available, the delegation of authority is referred to the Managing Director.

4.2 Crisis Communications

- In the event that a crisis situation arises either on or off-site, employees need to immediately contact the Nominated Approver to help with resolving the matter. The Nominated Approver will liaise with the appropriate parties internally (including the Project Manager, respective Discipline Leader and Market Secor Director, and the Managing Director and Technical Director) and externally (including but not limited to the media, corporate or crisis communications' representatives from client organisations, external legal counsel if required, etc.).
- The Nominated Approver will prepare a statement for the key spokesperson (Managing Director) and will serve as the crisis and investor relations liaison.
- You must not release any information, including social media posts/comments, photographs or videos, of a site crisis situation unless authorised to do so.

4.3 Marketing and Communications

- As part of our business activities, we may send invitations, marketing materials or communicate information to our clients, stakeholders and third parties, with whom we believe may be relevant or of interest or provide details about our capabilities. At any time, recipients can opt-out of receiving any BGER communications (other than as required for the operation of the Company such as bids, project delivery, payment of accounts, etc.) or change marketing and communications preferences.
- All electronic marketing or communications material will feature an 'unsubscribe' link to enable recipients to opt-out or change preferences.
- BGER complies with all privacy obligations under the Privacy Act 1988 (Australia), European Union General Data Protection Regulations, the Data Protection Act 2018 (UK) and the laws of other jurisdictions in which we operate.

5. 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 or makes a notification or report of real or perceived breaches/violations of this Policy.

Employees can consult the M&C team in initial instance about external communications and if a suspected breach of this policy occurs, we encourage employees to:

- contact or speak to the Nominated Approver;
- contact or speak to the Managing Director or Technical Director; and
- contact or speak to any of Members of the ARC.

We also encourage our clients and stakeholders to report and express their concerns relating to our employee' behaviours and suspected violations of this Policy.

For further details about the Company's External Communications Policy, please contact:

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