



Energy One Group Code of Conduct

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1 Code of Conduct

The Energy One Group is committed to achieving performance and results to provide value to our shareholders, while considering the interests of employees, customers, the community and others with whom we do business. In striving for outstanding performance and results, we should not compromise our ethics or principles. The Energy One Group places great importance on honesty, integrity, respect and trust.

1.1 Code of Conduct Scope

This Code of Conduct applies to all Energy One Group management and employees. The Code also applies to contractors, sub-contractors, vendors, service providers, agents, consultants, visitors and guests as applicable. This group is hereafter referred to as “Employees”. This Code does not form part of any person’s contract of employment or contract for services.

1.2 Code of Conduct Framework

The Code of Conduct set standards for the way we work at The Energy One Group. The Code provides a practical set of guiding principles to help our directors, employees and contractors make decisions in their day to day work. The Code is supported by a number of more detailed policies that form part of the Energy One Group Policy Framework. These policies are referred to in this document and are located on the Energy One Group Intranet. The Energy One Group takes the Code of Conduct and all the related policies seriously. As someone working with Energy One, you are required to comply with the principles of the Code and the Energy One Group Policy Framework which are further explained below.

2 Code of Conduct Principles

| | |
|--------------------------------------|---|
| Corporate Reputation | We act in The Energy One Group's best interests and value The Energy One Group's reputation in the marketplace. |
| Honesty and Integrity | We act with honesty and integrity with respect for the interest of our stakeholders both internal and external. |
| Respect for Others | We treat others with respect, value difference and maintain a safe working environment. |
| Conflicts of Interest | We identify conflicts of interest and manage them responsibly. |
| Personal Benefits | We do not make or receive improper payments, benefits or gains. |
| Privacy & Confidentiality | We respect and maintain privacy and confidentiality, including customer, business partner and employee information. |
| Compliance | We comply with the Code, the law and The Energy One Group policies and procedures. |
| Honesty and Integrity | We act with honesty and integrity with respect for the interest of our stakeholders both internal and external. |
| Respect for Others | We treat others with respect, value difference and maintain a safe working environment. |

3 Corporate Reputation

We act in Energy One's best interests and value Energy One's reputation in the marketplace.

About this principle:

The Energy One Group's shareholders, customers and the community at large expect The Energy One Group and everyone who works at The Energy One Group to act professionally and ethically. Everyone connected with The Energy One Group has a role to play in shaping our corporate reputation by considering how their or someone's else's actions could impact on Energy One's performance and reputation in the market place.

Our expectations of you:

- Deal fairly and honestly with Energy One Group's customers, suppliers, competitors or any other third party that is involved with our business.
- Only provide advice to customers that you are authorized to provide in the course of your work.
- Help protect The Energy One Group and our customers against potential theft or fraud.
- Exercise your financial authorities, expenditure, payment options and reimbursement transactions within limits outlined by relevant policies.
- Use of Energy One Group systems and equipment appropriately and for proper purposes. This includes email, messaging, internet access and technology and financial systems.
- Never entertain customers or participate in Energy One Group activities or functions in a way that may damage Energy One's reputation.

4 Honesty & Integrity

We always act with honesty and integrity with respect for the interests of our stakeholders both internal and external.

About this principle:

Our success depends on the trust of our customers, which is earned by acting with honesty and integrity and by considering the impact of The Energy One Group, our shareholders, customers, colleagues and the general community when making decisions.

Our expectations of you:

- Immediately report any suspicion of fraud, theft or other dishonest behaviour by others.
- Never use your position with The Energy One Group or any information you received through your work with The Energy One Group to further your own interests or help others do so.
- Consider the interests or needs of the customer when providing advice, products or services to them.
- If you have access to confidential information you are not permitted to use or share that information for securities trading purposes (“insider trading”) or for any other purpose except the conduct of Energy One’s business. All non-public information regarding The Energy One Group should be considered confidential information.
- Be honest and forthright in all your communications and dealings with Energy One, including your manager, colleagues, auditors and regulators.
- Use The Energy One Group’s assets and funds for proper purposes and keep accurate and transparent records of all payments or receipts for transactions when you use The Energy One Group’s funds.

For more information refer to related policies:

Share Trading Policy

5 R e s p e c t O t h e r s

We treat others with respect, value difference and maintain a safe working environment.

About this principle:

We are all expected to treat the people we deal with through our work at The Energy One Group with dignity and respect, whether they are colleagues, customers, suppliers or other third parties. Unlawful discrimination, harassment of any kind, bullying or victimisation or other unacceptable or offensive conduct will not be tolerated. The Energy One Group respects the rights of individuals to work in a safe working environment.

Our expectations of you:

- Treat all people you deal with through your work at The Energy One Group with dignity and respect.
- Never unlawfully discriminate, harass or bully your colleagues, customers or anyone else in the workplace.
- Contribute to promoting a safe working environment by taking responsibility for health and safety and reporting any issues as soon as possible.

For more information refer to related policies:

Workplace Discrimination, Bullying & Harassment Policy

Work Health and Safety Policy

6 Conflicts of Interest

We identify conflicts of interest and manage them responsibly.

About this principle:

Employees are required to act ethically and professionally at all times and may not allow any actual or perceived conflict of interest to affect the company's operations. A conflict of interest can occur when you put your own personal interests before those of The Energy One Group or our customers.

Our expectations of you:

- Disclose any actual or potential conflicts of interest with your manager.
- Seek approval for any outside business interests including non-Energy One Group work (paid or unpaid), business ventures, directorships, partnerships or direct or indirect financial interests of The Energy One Group or The Energy One Group's partners, customers or suppliers.
- Disclose to your manager any personal associations with a third party that you are involved in evaluating or negotiating with The Energy One Group, whether for employment, as a customer or supplier or for any other reason.

For more information refer to related policies:

Conflict of Interest Policy

7 Personal Benefits

We do not make or receive improper benefits or gains.

About this principle:

Where a reward from a current or potential customer or supplier creates an obligation or expectation that you will give preferential treatment to the person or company offering the reward, the reward is improper and therefore must be refused.

Our expectations of you:

- Never accept any gift, reward or entertainment, including discounted products, free travel or accommodation, if it could create any obligation or expectation that could conflict with your work at The Energy One Group.
- Obtain proper approval for and properly record any donations, sponsorships, charitable contributions, gifts and entertainment you accept from, or give to, a third party on behalf of The Energy One Group.

8 Privacy and Confidentiality

We respect and maintain privacy and confidentiality, including customer, business partner and employee information.

About this principle:

In your work at The Energy One Group you may come across private and confidential information relating to The Energy One Group, colleagues, customers, suppliers or other third parties. When people provide this information, they do so with the understanding that their private and confidential information will be handled professionally. Misuse of confidential or private information can have commercial and reputational consequences for The Energy One Group and can impact those whose information has been misused. The Energy One Group is committed to maintaining the confidentiality and security of private information and you are asked to honour this commitment.

Our expectations of you:

- Do all you can to keep private information secure by storing it in an area that cannot be accessed by people who are not authorised to view the information.
- Follow procedures and requirements to protect information whenever you provide details over the phone, email or online.
- Follow all protocols and procedures relating to the maintenance of passwords and user profile setup. Never allow someone else to use or log on using your individual details.
- Collect, use, store, handle, update and destroy information, particularly personal information according to company procedures.
- Never disclose any information about The Energy One Group that is not already in the public domain without the proper authority to do so.

For more information refer to related policies:

[Privacy Policy](#)

[Confidentiality Policy](#)

9 Compliance

We comply with the Code, the law and The Energy One Group policies and procedures.

About this principle:

You must be familiar and comply with all relevant laws and regulations in relation to your employment at The Energy One Group. Any breaches of the law can have serious consequences for both The Energy One Group and yourself as an individual.

Our expectations of you:

- Always conduct yourself according to the requirements outlined in this Code, in legislation, and Energy One Group policies and procedures.
- Complete all required training to ensure you are aware of and fully understand the relevant laws, policies, procedures and practices that relate to working at The Energy One Group.
- If you are unsure of whether a law, policy or procedure applies to you, please seek guidance from your manager.

10 Reporting Breaches

We immediately report any breaches of the Code, the law or The Energy One Group policies and procedures.

About this principle:

People working with or for The Energy One Group are required to comply with the principles outlined both in the Code of Conduct and related policies. Failure to comply with the principles of the Code or The Energy One Group Policy Framework will be considered a breach of your employment conditions and may result in disciplinary action.

Our expectations of you:

If you become aware of a breach of the Code or have a reasonable suspicion of a breach or you have concerns about the behaviour of anyone at The Energy One Group, you are urged to:

- report the matter to your immediate Manager; or
- if the matter to be reported concerns your immediate manager or if you are not satisfied that your immediate manager is treating your concerns seriously, report the matter to: Notifiable Persons as per SharePoint – HR site; or
- report the matter in accordance with The Energy One Group's Whistleblower Policy

No Disadvantage for Reporting:

If you have reasonable grounds to suspect the information you are reporting is true, you will not be disadvantaged personally or in your employment, even if the conduct that is reported is later found not to be in breach of the Code. However, if you make an intentionally false or malicious report, you may be in breach of the Code, and may subject to the consequences of that.

The Energy One Group is committed to ensuring that you are not disadvantaged or discriminated against for reporting concerns where you have reasonable grounds to suspect the information you are disclosing is true. Energy One's Whistleblower Policy outlines further protections and procedures available to our people reporting concerns.

What the Company will do:

The Energy One Group is committed to investigating matters raised where sufficient information is provided to warrant an investigation. Our leaders are committed to dealing fairly and honestly with any reports that are brought to their attention, and to working with team members to resolve issues.

For more information refer to related policies:

Whistleblower Policy