

# **ETHICS & CODE OF CONDUCT POLICY & GUIDELINES**

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| <b>Revision No:</b> | <b>1</b>                |
| <b>Date:</b>        | <b>18 February 2025</b> |

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### Document Change Control

All changes are to be agreed and authorised by the CEO.

### Document Change Record

| Revision No. | Date             |
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| 1            | 18 February 2025 |
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### Document Sign-off

|     | Signed  | Date       |
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| CEO |  | 18/02/2025 |

All changes are logged in the Policies Document Control Register.

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## **1. ABOUT THIS POLICY**

- 1.1 Brockwell Energy Limited, including its subsidiaries and affiliates, is committed to the highest ethical standards in all areas of our business. This Ethics and Code of Conduct Policy defines our expectations for professional behaviour, integrity, and transparency.
- 1.2 This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers within Brockwell Energy. It sets out the standards of conduct that govern how we work, communicate, and interact both internally and externally.
- 1.3 Brockwell Energy expects all representatives to adhere to this policy in every aspect of their work. Management is responsible for ensuring compliance and addressing any breaches in a fair and timely manner.
- 1.4 This policy is not part of any employment contract. The Company may revise this policy as needed to uphold our commitment to ethical standards and integrity.

## **2. WHO IS RESPONSIBLE FOR THIS POLICY?**

- 2.1 The Company's Board of Directors (the Board) has overall responsibility for the effective implementation and operation of this policy. The Board is committed to ensuring that our business practices uphold the highest standards of integrity, ethical responsibility, and accountability, fostering a culture of fairness, transparency, and respect in all our operations.
- 2.2 All managers are responsible for ensuring compliance with this policy, fostering a culture of ethical conduct, and holding staff, contractors, and stakeholders accountable for upholding the Company's values of integrity, transparency, and professionalism. They must also take corrective action when ethical standards are not met.
- 2.3 Staff, contractors, and stakeholders are encouraged to report any concerns related to ethical conduct, integrity, or compliance with this policy. Open communication is essential to maintaining a responsible and trustworthy work environment, and all concerns will be addressed promptly and appropriately.
- 2.4 Any questions about this policy, as well as requests for guidance, support, or training on ethical business practices, should be directed to the Company.
- 2.5 Staff are invited to provide feedback and suggest ways in which this policy might be improved by contacting the Company.

## **3. PURPOSE**

- 3.1 The Ethics and Code of Conduct Policy establishes the ethical standards and behavioural expectations for everyone at Brockwell Energy. This policy underscores our commitment to integrity, transparency, and respect in all our dealings, ensuring that our business practices reflect our core values.

## **4. SCOPE**

- 4.1 This policy applies to all Brockwell Energy employees, contractors, and partners, setting clear standards for conduct in every aspect of our operations, both internally and externally.

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## 5. COMMITMENT

5.1 Brockwell Energy is committed to upholding the highest standards of ethical conduct. We believe that operating with honesty, integrity, and accountability is essential to fostering trust with our stakeholders and achieving sustainable success.

## 6. PRINCIPLES

6.1 Our Code of Conduct is guided by the following principles:

- **Integrity:** We conduct our business with honesty, fairness, and transparency, ensuring that all actions reflect our commitment to ethical practices.
- **Respect and Inclusion:** We are committed to fostering a workplace that respects diversity, values inclusivity, and promotes a culture of respect for all individuals.
- **Responsibility and Accountability:** Brockwell Energy employees and representatives are responsible for their actions, acting in the best interests of the company, its stakeholders, and the community.

## 7. IMPLEMENTATION

### Anti-Corruption and Fair Business Practices

7.1 We maintain a zero-tolerance approach to bribery, corruption, and fraud. All employees are expected to conduct business with fairness, honesty, and transparency. Brockwell Energy complies fully with anti-bribery and anti-corruption laws and regulations in all areas of operation.

### Confidentiality and Data Protection

7.2 We value and protect the confidentiality of information, whether related to Brockwell Energy, our clients, or partners. Employees are required to handle all data responsibly, in compliance with data protection laws and company policies.

### Professional Conduct and Responsibility

7.3 Brockwell Energy employees are expected to perform their duties with professionalism, diligence, and accountability. We encourage open and honest communication, respect for others, and adherence to company standards and guidelines.

### Respect for Human Rights

7.4 We are committed to upholding human rights within our operations, promoting fair treatment, equality, and safety for all employees and contractors. Discrimination, harassment, or any violation of human rights has no place at Brockwell Energy.

7.5 Brockwell Energy is committed to preventing modern slavery in all its operations, as outlined in our Anti-Slavery & Human Trafficking Policy.

### Conflict of Interest

7.6 Employees must avoid conflicts of interest that could affect their judgement or loyalty to the company. Any potential conflicts must be disclosed to management promptly to ensure transparency and accountability.

### **Reporting Violations**

- 7.7 Brockwell Energy provides secure channels for reporting ethical concerns or potential violations of the Code of Conduct. We encourage employees to speak up and assure that reports made in good faith will be taken seriously and treated confidentially.

## **8. CONCLUSION**

- 8.1 This Ethics and Code of Conduct Policy reflects Brockwell Energy's unwavering commitment to ethical, respectful, and transparent business practices. By upholding these standards, we create a positive workplace culture and reinforce our reputation as a trusted partner and responsible corporate citizen.