

# Arrow Energy Code of Conduct Acting with Honesty and Integrity



Safe Work. Strong Business.



# Our values

## **Respect**

We treat all people, inside and outside Arrow, with dignity and respect.

## **Lead**

We lead by continually seeking ways to improve safety, delivery, cost, quality, and teamwork.

## **Integrate**

We are seamless in our coordination between departments, groups and systems to drive continuous improvement.

## **Solve**

We view challenges not as barriers but as opportunities to improve through innovation and change.

## **Own**

We think and act like owners, taking personal responsibility for Arrow's business performance and conduct.

# CEO Message



## **Cecile Wake**

Chief Executive Officer

Our Code of Conduct (Code) defines the standard of behaviour Arrow Energy (Arrow) expects in conducting our business activities.

Our Code is founded on our values: respect, lead, integrate, solve and own. It provides the cultural basis of how Arrow operates. As Arrow strives to live its vision and mission, it is worth remembering that how we achieve success is just as important as success itself.

Each one of us must act in accordance with the law and the behavioural standards set out in this Code. You must make decisions in the best interest of the company, guided by your professional judgment and sense of appropriateness. Taking personal responsibility for our individual actions is critical to our success.

Our leadership principles go hand-in-hand with the Code by driving accountability for the way we act and lead. We value and encourage an open environment where people feel comfortable asking questions and raising concerns. You have my assurance that your concerns will be taken seriously and acted upon promptly. By speaking up if you see or hear something that is inconsistent with our values and behaviours, you are supporting our collective responsibility to build and protect Arrow's reputation.

It is vital that everyone understands and follows this Code and shares a commitment to upholding our standards. This shared commitment will help strengthen our reputation, support our vision and underpin our business success.

I ask that you make yourself familiar with this Code and refer to it as needed. In treating others with honesty and integrity, together we will collectively ensure Arrow is a strong, resilient organisation that is respected and valued.

# Introduction

# Who must Follow our Code?

This Code applies to Arrow employees, contract staff and Directors.

Our contractors, consultants and business partners are expected to act in a manner consistent with this Code.

# Acting with Honesty and Integrity

Acting with honesty and integrity and demonstrating Arrow's core values, will support the achievement of Arrow's vision to be the most competitive and respected developer of unconventional gas value chains in Australia.

This Code provides a practical set of rules that help define how we are expected to conduct ourselves, setting the boundaries and helping to ensure we do the right thing, in the right way. It addresses our responsibilities to the company, our Shareholders, to each other and to our customers, suppliers, business partners, community, government and anyone else with whom we interact in the course of conducting our business.



Remember, if you know or suspect someone is violating this Code, please speak up.

Read the guide and watch the video of Legal, Ethical and Wise here.

## Expectations

It's expected you understand the Code and comply with it fully. No matter what your role, as a company representative you are expected to:

- uphold our values at all times
- always act with honesty and integrity
- follow the law
- comply with this Code and all other company policies and standards
- be accountable for your actions
- feel comfortable to speak up when you feel that behaviours are not in line with the company's expectations.

You need to use good judgement and business common sense and, if ever in doubt, challenge yourself:

- is this legal?
- is this ethical?
- is this wise?
- would I be comfortable if others knew?
- if this was my company and my money, would I be happy with this action?

If you are a manager, you also need to:

- ensure that anyone you supervise understands their responsibilities under the Code and other applicable company policies and standards
- set an environment that makes people feel comfortable to raise concerns in a confidential manner and without fear of retribution
- immediately act when you become aware of any breach of the Code, laws or company policies or standards.

Any breach of this Code may involve serious consequences up to and including dismissal. In serious cases where a breach is a breach of law, fines and imprisonment could be imposed by a regulator.

# Speak Up



Arrow has zero tolerance for not following this Code and will act promptly where needed. The company will protect those who raise honest concerns, however false or vindictive accusations are a breach of this Code and will be treated seriously. When reporting honestly, you don't have to be 100% right, you just need to believe the information you provide is factually correct.

Raising a concern on a breach of this Code in a timely manner allows the company to properly consider the implications and necessary steps early on, in order to either avoid an incident or minimise any negative impacts going forward.

Where you believe behaviours or rules contained within this Code are not being followed, you have a duty to speak up and report your concerns. You have several options available for reporting:

- through your reporting line
- Legal and Governance Team
- to any other senior person with whom you feel comfortable to openly share a concern, e.g. People and Culture or the General Counsel
- using Arrow's external Whistleblower Service, which enables you to remain anonymous if you prefer.

## Whistleblower Service

The Whistleblower Service offers a lot of value in that it preserves the anonymity of the person raising a concern. We understand how important that is, especially when very serious matters are being raised or if you are concerned about repercussions for yourself. It is important to know that there can be some challenges investigating anonymous complaints, as the investigator will be unable to make any follow up inquiries with the person that raised the concern in the first place. It also prevents Arrow from providing feedback in relation to the concern. If you have a concern, you are in the best place to balance those considerations. Regardless of how you raise a concern, it will be investigated promptly.



You can contact Arrow's Whistleblower Service using a dedicated toll-free number, website or email address to report suspected misconduct. Individuals contacting by phone will be connected to an experienced call centre operator who will ask some questions, in confidence, about the conduct. This service is anonymous and you will not be asked to reveal your identity unless you choose to do so.

An experienced investigator will then review the information provided and will summarise the information, consider its severity and reliability, suggest specific follow-up action/s and promptly submit a report to a designated Arrow representative for follow-up or corrective action.

Arrow will not tolerate discrimination or retaliation of any kind against reports of misconduct made.

**Arrow's Whistleblower Service contact details are:**

- a. Telephone line [Australia]  
1800 728 593.
- b. Website  
[HALO Whistleblower Service](#)
- c. Email  
arrow@deloittedigital.com.au
- d. Reply paid postal address: Arrow Energy, Reply paid 12628, A'Beckett Street, Victoria 8006



## documents

Whistleblower Policy  
ORG-ARW-GOA-POL-00009

# Safety

Arrow believes nothing less than zero harm is acceptable. This applies to people, company assets and the environment. Safety is our highest priority.

## Health and Safety

Arrow aims to provide a safe, secure and healthy working environment that creates and sustains a safety culture that drives our commitment to achieving zero harm. We need to feel safe at work and be always looking out for one another.

To create this environment you must understand and comply with Arrow's Health Safety and Environment (HSE) Policy and HSE Standards Compendium Standard for the management of Health, Safety and Environment.

## Community and Environment

To build and maintain Arrow's social licence to operate, the company must work with the community to manage its social and environmental impacts.

We must operate in a manner that seeks to both manage impacts on existing social infrastructure, environmental issues and enhance the community.

Arrow also has land access rules governing how we can gain access to our landholders' properties. These rules must be complied with in conjunction with our government engagement protocols and community engagement policies.



### documents

Health Safety and Environment Policy

[ORG-ARW-HSM-POL-0001](#)

Arrow HSE Standards Compendium Standards for the management of Health, Safety and Environment

[ORG-ARW-HSM-STA-00001](#)

Land Access Rules

[99-LD-LRE-0004](#)

Government Engagement Protocol

[ORG-ARW-STL-STR-00007](#)

Constructive Community Engagement Policy

[ORG-ARW-CEM-POL-00011](#)

Complaints Management System

[ORG-ARW-CEM-POL-00012](#)



Each of us has a role in safety:

- be a visible safety leader
- be 'fit for duty'
- follow the 9 Life Saving Rules
- follow the 10 Process Safety Fundamentals
- stop work or intervene when faced with a situation believed to be unsafe or non-compliant
- be encouraged to undertake a safety conversation and have the respect to accept one
- report all situations which have, or which could potentially have, harmed people or damaged the environment
- plan ahead to minimise and manage Health Safety and Environment (HSE) risks.

# Compliance

Arrow is committed to complying with the law and our own policies, standards, procedures and processes.

We expect you to embrace a culture of compliance, and where relevant to your role, ensure controls are in place to effectively meet Arrow's regulatory compliance obligations.

## Compliance

All Arrow staff are responsible for:

- performing their duties safely and in a legal, ethical and wise manner
- complying with Arrow's policies, standards, procedures and processes
- where relevant to their role, ensuring effective controls are in place to meet specific regulatory obligations
- reporting to their manager, any potential or known non-compliance with regulatory obligations or Arrow's policies and standards
- reporting to their manager any concerns that regulatory compliance controls may not be in place or effective so that we can ensure we have a robust system in place for complying with our material regulatory obligations
- when required, participating in the resolution of compliance issues and incidents
- ensuring they complete all mandatory training on time.



In summary, to help Arrow maintain a culture of compliance, you need to:

- understand your role
- comply with Arrow's policies, standards and procedures
- complete all mandatory training on time
- highlight the need for new procedures
- report any suspected or identified breaches.



### documents

Compliance Framework  
ORG-ARW-GOA-STR-00001

# People

People are Arrow's most valuable asset and personal safety, security and health (physical and mental) must be at the forefront. We must respect and value one another and foster a culture of inclusiveness.

We depend on, and draw upon, the varying backgrounds, knowledge, points of view and talents of each other to reach our full potential. Through allowing our people to reach their full potential, we develop a high performance culture which allows Arrow to achieve its objectives.

## Human Rights

Arrow is committed to respecting human rights across both our operations and our supply chain, as outlined in the UN Guiding Principles on Business and Human Rights.

We are committed to providing a workplace that respects our employees' human rights. We are opposed to, and will oppose, all forms of slavery, forced or compulsory labour and child labour, both within our organisation and within our supply chain.

Arrow respects the rights and interests of the communities in which we operate, by listening to them, understanding and managing the environment, economic and social impacts of our activities.

We respectfully acknowledge the past and present traditional owners and custodians of the land of the indigenous peoples, and respect their culture and identity.

## Diversity & Inclusion

**At Arrow, everyone belongs.** We treat everyone with fairness, respect and dignity. We expect those we work with to act in a way that is consistent with these expectations.

We have a high performance culture that embraces diversity and inclusivity - where differences are valued; where everyone has the equal opportunity to develop skills and talents consistent with our values and business objectives; where all individuals feel psychologically safe, respected and connected; and where the richness of ideas, backgrounds and perspectives are harnessed.



In your day-to-day activities, be mindful of your surroundings. What you may believe is ok, may be perceived differently by others. To manage these differences, refrain from making inappropriate jokes or comments and don't distribute or show offensive or derogatory material or pictures.

If you are offended by someone's actions, speak up - tell them and ask them to stop. Sometimes educating someone on the impacts of their actions is all that is needed.



If you have consumed alcohol during the course of the working day/night, or had a 'bender' the night before, recently ingested illicit drugs or medication that may adversely affect your abilities, don't come to work! Think of your safety, the safety of those around you and the safety of those that are reliant on your decision-making.

We understand the value of diversity and will not discriminate in any way based on race, colour, national origin, religion, age, gender, sexual orientation, marital status or disability.

We are committed to creating an inclusive organisational culture that is free from all forms of discrimination, bullying and harassment, so that we can fully realise the benefits of Arrow's diversity and all our people can thrive.

## Harassment

Arrow provides a workplace that is free from harassment and intimidation.

We have zero tolerance towards any form of abuse or harassment, including actions that may be reasonably considered as offensive, unwelcoming, humiliating, intimidating, discriminatory or hostile, and towards any form of sexual harassment.

If you believe you have been harassed or mistreated by anyone at Arrow or representing Arrow, you should immediately report the incident to your supervisor, People and Culture, the Legal and Governance Team or Arrow's Whistleblower Service. Similarly, supervisors and managers who learn of any such incident should immediately report it to People and Culture. People and Culture will promptly and thoroughly investigate any complaints and take appropriate action.



## documents

Alcohol and other drugs procedure

ORG-ARW-HSM-PRO-00005

## Alcohol and Other Drugs

Our position on alcohol and other drugs (AOD) is simple: Arrow has zero tolerance for AOD in the workplace. Staff and Contractors must present 'fit for work' and free from the influence of AOD. Employees at an Arrow worksite, doing any work for Arrow, when driving an Arrow vehicle at any time, or when travelling on the Arrow bus shall not:

- Take or be under the influence of illegal or non-prescribed psychotropic drugs
- Have a Breath Alcohol Concentration (BrAC) above 0.000
- Misuse prescription drugs.

Engaging in these activities may result in disciplinary action up to and including dismissal and referral to law enforcement authorities.



# Business Integrity



Never offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment, to influence a business outcome or to gain any business advantage.

If you are involved (directly or indirectly) in an act of bribery and corruption, you are exposed to being personally liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment.

To be a competitive and reputable company, it's paramount we conduct ourselves and our business in an honest, ethical and transparent way. We also expect our counterparties (suppliers, customers, contractors and sub-contractors) to act in the same way.

Arrow does not tolerate bribery, insider trading, fraud or money laundering. Facilitation payments are bribes and must not be paid. You must disclose your personal interests so that we can identify and manage any conflicts of interest that may arise. You must never accept inappropriate gifts or entertainment.

## Bribery and Corruption

Bribery is the voluntary giving (promising or offering) of something of value to a private or government official in order to obtain or retain business or other improper advantages in the conduct of business. In this context, the term applies regardless whether the:

- voluntary giving is offered, promised or given
- offering, promising or giving was done directly, or through intermediaries
- bribe was for the benefit of the private or government official or a third party
- company receives in exchange a business contract or some other form of improper advantage.

Due to Arrow's ownership, we are also subject to strict international anti-bribery and-corruption laws.

You must never offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment, to influence a business outcome or to gain any business advantage.

Where it's suspected or known that bribery and corruption has taken place within supplier companies and/or their subcontractors, these concerns must be immediately reported to the Legal and Governance Team.

# Dealing with Government Officials

Dealings with governments and their officials are covered by special rules and are not the same as conducting business with private parties.

Arrow is not aligned with any political party at either a local, state, or federal level. We support engagement with governments and oppositions of the day, and participate actively in new policy and policy reform to progress the interests of our business, and to minimise impacts on communities.

In general, do not offer or accept anything of value to/ from a government official, directly or indirectly. In certain

circumstances, with the prior approval from the VP Corporate Affairs, you may be able to offer customary entertainment, travel, hospitality, a gift or attend a political industry event. Any such dealings are also required to be reported to the Legal and Governance Team as per the Gifts & Hospitality (G&H) Reporting obligations described below.

Political donations, facilitation payment, solicitation and extortion are not permitted.

## Business Partners

Arrow is committed to building business partnerships based on good corporate governance and compliance with anti-bribery and corruption requirements. These requirements extend to agents, consultants, government intermediaries or other intermediaries that either deal directly or indirectly with Arrow operations.

Arrow's representatives (e.g. contract holder) are required to obtain reasonable assurance from these parties that they are not involved in activities that would be considered bribery or corruption. This can be achieved by:



A government/ public official is defined as:

- a Member of State and Federal Parliament, a government department or an authority, and candidates for a political office
- an international public organisation and its employees
- a fully or partially state-owned / state-controlled company and its employees,
- members of political parties or the political party itself.

A government official also extends to an officer's immediate family members, such as spouse, dependent child or dependent household member.

CNPC and related affiliate staff (and family) on Arrow business are not considered government officials.



It's worth noting that observance of insider trading laws is in addition to your continuing obligation to maintain the confidentiality of Arrow's business information.

- informing business partners of our commitment to abiding by anti-bribery and corruption laws, and our commitment to good corporate governance
- seeking the same commitment from business partners
- performing adequate due diligence on business partners and their sub-contractors, prior to engaging them and throughout the life of their engagement with Arrow
- including, where relevant, clauses which are designed to legally enforce Arrow's antibribery position in Arrow contract documents.

Arrow and/or its employees may be held liable for any bribes paid by a third party acting on behalf of the company.

You therefore need to take care when evaluating prospective business partners who interact with government bodies on behalf of Arrow. You must not engage with a business partner if there is reason to believe they may attempt to bribe a government official.

We must always treat our business partners in a fair manner. This includes giving local resources a fair chance and using them where possible and where it makes business sense.

You should avoid working with partners whose ethical or occupational health and safety standards are incompatible with this Code.

## Insider Trading

Insider trading is when a person is aware of material information relating to a company that has not yet become public information and trades on the basis of the inside information.

Arrow has clear rules governing insider trading:

- don't discuss inside information with any person unauthorised to possess the information (and certainly not with anyone outside of Arrow - including family and friends).

- don't trade while you know any inside information.
- don't encourage anyone to apply for, acquire or dispose of any financial products as outlined in Chapter 7, Part 7.1, Division 3 of the *Corporations Act 2001* ('Financial Products') (e.g. securities/shares/debentures), either by giving them a tip or by any form of 'wink and nod' based on inside information.
- if you come across inside information about any publicly listed company in the course of your work, you must not deal in that company's shares or securities until any inside information you have becomes public. You must also not share the information with anyone unless you are authorised to do so.



**Don't:**

- deal with actual or suspected criminals
- knowingly acquire, use or hold monetary proceeds or property acquired from proceeds of crime
- hide the origin or nature of criminal property
- falsify, conceal, destroy or dispose of relevant documents.

## Money Laundering

Money laundering is the process of hiding or disguising the source of illegally obtained funds to make them appear legitimate. It also covers the use of legitimate funds to support crime or terrorism.

When dealing with counterparties, you must undertake appropriate due diligence on their business and background to understand the origin and destination of their money and assets.

You must report suspicious transactions or incidents of money laundering to the Legal and Governance Team.

## Gifts and Hospitality

The acceptance or provision of some gifts and hospitality (G&H) is often customary and reasonable. However, there are times when accepting or providing gifts and hospitality is not appropriate. It is important to ensure that accepting or providing gifts and hospitality does not compromise your ability to make an objective business decision on behalf of Arrow (or appear to compromise your judgment).

G&H may be accepted/provided when:

- a. it is a normal advertising or promotional giveaway of limited financial value
- b. customary and reasonable under the business circumstances. For example, a meal with a supplier or attendance at a sporting, cultural, theatrical, charitable or other similar event might be acceptable provided that:
  - i) the value is considered reasonable
  - ii) the host is in attendance and
  - iii) an Arrow business interest is being served
  - iv) there are no imminent business decisions pending.

There are thresholds and rules around acceptance/provision of any G&H, with additional reporting / approval requirements when offering to /accepting from Government Officials. These are summarised in the following table:

| Value Threshold                                 | G&H Reporting Requirements   |   |
|---|--|---|
|   | Without Govt Official  | With Govt Official  |
| Less than \$50                                  | Reporting encouraged but not mandatory   | Reporting / registration mandatory  |
| Greater than or equal to \$50, Less than \$150  | Reporting / registration mandatory   | Reporting / registration mandatory<br><br>Prior Line Manager approval   |
| Greater than or equal to \$150 or Unknown Value | Reporting / registration mandatory<br><br>Prior line manager approval<br><br>Support by Legal and Governance | Reporting / registration mandatory<br><br>Prior Line Manager approval<br><br>Support by Legal and Governance<br><br>Prior VP Corporate Affairs approval |

All required disclosures must be reported to Legal and Governance via the [COI App](#).

# Conflict of Interest

There's an expectation that anyone acting on behalf of Arrow is acting in the best interest of the company. Acting with honesty and integrity implies managing Conflicts of Interest (COI). You should avoid situations that create actual or perceived tension between your interests and Arrow's interests.

Conflicts of interest can be actual, perceived or potential:

- An **actual** conflict of interest involves a real conflict between Arrow's business interests and your private interests.
- An **apparent/perceived** conflict of interest exists where it could appear to someone else that there is a conflict between Arrow's business interests and your private interests.
- A **potential** conflict of interest arises where a conflict could arise between Arrow's business interests and your private interests.

Without knowing the entirety of Arrow's business activities, it can be very difficult to self-assess whether a private interest may give rise to an actual conflict of interest or how a situation may appear to another party.

For that reason, you are asked to disclose your private interests which could give rise to a conflict of interest. You should consider matters such as your shareholdings, your personal relationships and past employment.

**It is okay to have personal interests.** Once you disclose them, if they give rise to a conflict of interest, we can put controls in place to manage that. We do that so that business is not influenced by personal factors or perceived that way by others.

Secondees working in Arrow should first act in the best interest of Arrow and should only share business information with shareholders through the Shareholder and Investor Relations department.

You must disclose any actual, apparent/perceived or potential conflicts of interest (which includes disclosing any material personal interest) to your manager and the Legal and Governance Team by using the [COI App](#).



Some steps to managing a COI:

- avoid situations which might be thought to influence actions or prejudice judgment in handling company business
- avoid becoming obligated in any way to representatives of companies you deal with or showing preference to third parties based on self-interest or the interest of family or associates
- not solicit from any person or entity doing (or seeking to do) business with Arrow gifts and/or entertainment
- be forthcoming and openly disclose any COIs, to ensure timely and appropriate action and controls can be put in place.



# Trade Compliance



Arrow is committed to competing freely, fairly and ethically. We expect business dealings to fully comply with all applicable local and international trade laws. Trade compliance includes regulations governing the import, export and domestic trading of goods, services, technology and software, as well as international sanctions and trade practices.

## International Trade

Arrow complies with all international trade laws of countries with which we deal including economic sanctions, import and export laws.

You need to carefully consider the potential impact of export laws and sanctions before transferring goods, services, technology or software across national borders. You need to remember that controls and sanctions can be imposed against countries, entities, individuals and goods, and therefore know which may be restrictions or prohibitions when conducting business.

You must meet import requirements when bringing goods or services into a country, ensuring all duties, levies and taxes are paid. You must not bring restricted goods into a country without declaring them.

You must never import prohibited goods.

## Competition Law

Arrow complies with the provisions of the *Competition and Consumer Act 2010*. Arrow does not tolerate anti-competitive practices such as price fixing, market sharing, exclusive dealings, bid rigging, controlling or maintaining of terms.

Arrow has some clear rules on dealing with competitors. You must refrain from:

- entering into any discussions contemplating or in any way suggesting the fixing, controlling or maintaining of terms, prices, discounts, allowances, rebates or credits for any



### Avoidance Measures

A failure to comply with these rules can severely damage our business and lead to fines and criminal proceedings for the company and for you personally. Therefore to help assist you in dealing with competitors, ensure you:

- a) have an agenda that is focused on the purpose of the discussion
- b) follow the agenda
- c) if possible, take someone with you
- d) ensure that a record of the discussion is kept
- e) take care communicating, especially around pricing and dealings with customers
- f) object to any comments that may be in breach of the Act, or if the discussion strays in a significant way from the agenda, and record your objection;
- g) make sure all information sent or disclosed by you (including emails) is accurate and, if appropriate, subject to a confidentiality agreement
- h) when in doubt, contact the Legal and Governance Team
- i) report any breaches straight away to the Legal and Governance Team

customers or suppliers. This ranges from the purchasing of stationery to buying gas. We should ensure that we act completely independently of others when it comes to deciding how to deal with our customers or suppliers

- any discussions about holding back gas production capacity or electricity production capacity from the market or any part of the market
- discussing the consolidating of our purchasing power (including through joint ventures) for goods or services
- discussing joint marketing (including through joint ventures) of gas to either domestic or foreign customers
- any discussion around black-listing suppliers or customers
- any discussion about trying to gain any advantage over mutual competitors or trying to prevent the entry into the market of mutual competitors
- framing any discussions as being on the basis that one or both parties agree not to enter into transactions with other competitors in the market.

# Safeguarding Information



When working with a third party, you must ensure you are authorised to share the information prior to doing so.

Everyone at Arrow must safeguard the Company's information, which includes everything from pricing data, commercial agreements, procurement contracts to the 'work program and budget', technical drawings and employee information.

## Information Management

Information is a valuable asset and needs to be effectively managed and maintained. You have an obligation to safeguard and respect the privacy and confidentiality of the information you hold as a representative of Arrow.

Information should not be freely disclosed to anyone outside the company, unless its disclosure is in line with company policies and procedures and any legislative requirements for business-related purposes. Disclosure must be contractually permitted and controlled appropriately, such as under a confidentiality agreement. Private, confidential or sensitive information must be protected at all times and only accessible, internally or externally, to authorised personnel.

When handling confidential and sensitive information, be especially careful by encrypting it when sharing with other authorised parties.

## Data Privacy and Protection

Arrow respects the privacy of all its staff and business partners and other external stakeholders. Personal information is information or an opinion (regardless of whether it is true or not) about an identifiable individual. Arrow is committed to complying with *Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (Privacy Act) ('Act')* when it comes to handling personal information and expects its staff to do the same.

You must respect a person's right to privacy and comply within the Act and with any other relevant contractual obligations. You must only collect personal information if it is reasonably necessary for Arrow's functions or activities and only use the information for the purposes it was collected. You must also take reasonable steps to protect personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

All personal data created, used, transferred to or stored on Arrow ICT and communication facilities may, under certain circumstances, be accessed, monitored and analysed by Arrow. This includes not only personal files, but also business-related files that contain personal data.



Information must be managed in accordance with Arrow's Information and ICT Security Management Policies and Record Keeping Standard.

## Records Management

Arrow understands the importance of records management, recognises its regulatory requirements and is committed to Australian records management principles, standards and practices. You must understand which information is a record, how it is to be managed and what needs to be done when it becomes obsolete.



### documents

- Information Policy  
[ORG-ARW-IMT-POL-00001](#)
- ICT Security Management Policy  
[ORG-ARW-TEC-POL-00007](#)
- Recordkeeping Standard  
[ORG-ARW-IMT-STA-00001](#)
- Privacy Policy  
[ORG-ARW-IMT-POL-00002](#)

## Business Communications

In the interests of Arrow and its Shareholders, it is critical that information issued externally is accurate, consistent and timely, has been through appropriate internal approval processes, and that Arrow staff represent themselves with the utmost professionalism.

Inappropriate, inaccurate or careless communications can be damaging to Arrow, and can have serious implications for the company and the individual.

Governance processes are managed by Corporate Affairs on behalf of the Arrow Leadership Team, in accordance with a Shareholder Protocol for External Communications agreed at takeover.



Employees are not to comment on Arrow in social media. Social media posts and comments are not anonymous and company references or opinions on industry performance may breach company policy.

Emails are formal business correspondence, and can remain accessible for long periods. Inappropriate or poorly considered words could be inferred as Arrow's formal position on a certain subject. In general, you should be mindful of this when writing business communications and think before you send them.

Arrow attracts media attention at a local, metropolitan, national and international level, so it's essential that our public communications are clear, accurate, consistent and responsible. In order to do this, only authorised spokespersons can engage the media and is managed through Corporate Affairs. If you are contacted by the media you are required to forward the request immediately to the Communications & Social Impact Manager.



## documents

- External Communications Policy  
[ORG-ARW-CEM-POL00013](#)
- Media Policy  
[ORG-ARW-CEM-POL00007](#)
- Media Policy for Contractors and Suppliers  
[ORG-ARW-CEM-POL00001](#)
- External Event and Conference Attendance Policy  
[ORG-ARW-CEM-POL00005](#)
- ICT Acceptable Use, Anti-Malware and Monitoring Policy  
[ORG-ARW-TEC-POL00004](#)
- People and Culture Policies  
[ORG-ARW-HRM-POL00007](#)

# Asset Security



Treat company assets as your own!

At all times you are expected to protect Arrow's assets and use them in the manner intended.

## Personal Use of ICT

Arrow understands and supports the occasional use of its IT and communication equipment for personal reasons. A level of business common sense is therefore expected to ensure the privilege is not abused. For example, the use of Arrow laptops, phones and Wi-Fi should not incur substantial costs or negatively affect productivity.

In addition to this, you should use Arrow's tools ethically and in a manner that will not cause damage to the company, or an offence to any other staff member.

All IT equipment and communication activity is owned by the company and is logged and regularly monitored. This information may also be used in legal or criminal proceedings. Arrow will report any illegal use to the proper authorities.

## Protection of Corporate Assets

We are all responsible for protecting and managing Arrow's assets. Company assets can include facilities, sites, property and equipment, tools, materials, ICT hardware and software, information, staff time at work, data, technology and intellectual property.

You are entrusted with these assets every day and it is your responsibility to use them appropriately and protect them against waste, loss, damage, misuse, theft, or misappropriation.

When you spend Arrow's funds, or commit Arrow to using resources, you need to make sure that the cost is in the best interest of Arrow, directly relates to company business and is appropriately authorised in accordance with the Manual of Authority.

Make sure your photo identification/security card, user IDs and passwords are kept secure.



### documents

- Manual of Authority  
[ORG-ARW-GOA-LRM-00001](#)



# Conclusion

Thank you for taking time to read this Code of Conduct. Please keep the information easily accessible and refer to it as required.

Arrow relies on the good judgement of its people to ensure a high standard of integrity and ethics is upheld. Sometimes identifying the right thing to do isn't an easy call, so if you aren't sure, you need to seek advice from your line manager, People and Culture, the Legal and Governance Team or your Arrow representative.

And remember, at any time you are able to report questionable conduct to Arrow's Whistleblower Service. Failure to act with honesty and integrity and failure to comply with the law or Arrow's corporate policies may result in disciplinary/performance action, up to and including separation.

## **Arrow's Whistleblower Service contact details are:**

Telephone line [Australia] 1800 728 593

Website – [HALO Whistleblower Service](#)

Email – [arrow@deloittedigital.com.au](mailto:arrow@deloittedigital.com.au)

Reply paid postal address: Arrow Energy,  
Reply paid 12628, A'Beckett Street, Victoria 8006







**Legal Disclaimer**

While Arrow Energy Pty Ltd has endeavoured to ensure that all information provided in this publication is accurate and up to date at the time of publication, it takes no responsibility for any error or omission relating to this information. Furthermore, the information provided shall not constitute financial product advice pursuant to the Australian Financial Services Licence held by Arrow Energy Pty Ltd's related body corporate. To the maximum extent permitted by law, Arrow Energy Pty Ltd will not be liable for any cost, loss or damage (whether caused by negligence or otherwise) suffered by you through your use of this publication. © Arrow Energy Pty Ltd March 2023