

P-05 Code of Conduct and Conflict of Interest Policy

Arden Energy Pty Ltd (ACN 660 438 219) · Version 1.0 · Effective 1 July 2026 · Next review 1 July 2027

1. Code of conduct

This code applies to everyone named below. Where a role mentioned in this policy is not yet filled, the Board appoints a person to carry out its duties until it is.

All directors, employees, contractors and consultants of the company will:

1. Act honestly, with integrity and in the interest of the project.
2. Follow the law in any country where they work.
3. Treat everyone with respect, with no discrimination or harassment, and support the gender equality, social inclusion and environmental and social safeguard plans of each project.
4. Protect confidential information and company property.
5. Use funder money only for the approved purpose.
6. Report any breach of this code (see P-06).

2. Conflict of interest

A conflict exists where a personal, family, financial or business interest could influence, or appear to influence, a decision for the company.

1. **Declare.** Everyone signs a declaration of interests when engaged, updates it when it changes and declares any interest at the start of each procurement, hiring or approval.
2. **Step out.** A person with a conflict takes no part in the decision, does not see the bids or the scores, and the step-out is recorded.
3. **Register.** The Finance and Grants Officer keeps the register of interests. The Board reviews it each quarter.
4. **Hiring.** No relative of a decision-maker is hired or contracted without the Board's written approval and a record of the open competition. A Board member's own conflicts are recorded in the register of interests and reported to any funder affected.
5. **Related parties.** Contracts with the company's directors, shareholders, co-financiers, customers or any related business are at arm's length, disclosed to any funder affected and not paid from funder money unless the funding agreement allows.

3. Breach

A breach may lead to dismissal, termination of a contract, recovery of funds and referral to the authorities.

4. Review

The Board reviews this policy each year.

Document control

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