

■ Code of Conduct Policy

1. Purpose / Introduction

- 1.1 To assist Energy Action, maintain a harmonious and ethical work environment, which upholds Energy Action Values.
- 1.2 The Code of Conduct sets out the basic principles and rules that all members of the Energy Action team must follow in the performance of their work.
- 1.3 Energy Action may amend or vary this Code of Conduct, in its absolute discretion from time to time.

2. Scope

- 2.1 The Code of Conduct applies to all members of the Energy Action team comprising Energy Action Directors, employees, volunteers, student placements and contractors of Energy Action (**EA People will be used to define Scope**).

3. Guiding Principle

All EA People are expected to behave in ways that are aligned with our Values.

3.1 Our Values

Our core values underpin all that we do. They are:

Accountability

We take responsibility for both the Company and our individual actions. We follow through on our commitments and are prepared to step forward and take on the difficult challenge.

Client Focused

We aim to create value for customers and meet and exceed their expectations. We will organise our processes and services to ensure that we reliably and consistently deliver quality outcomes for our external and internal customers.

Innovation

We are committed to lead does not follow, by shaping the markets we work within. We will foster an environment that facilitates creativity.

Integrity

We expect and support honesty and diligence, openness, and transparency in all dealings with colleagues and clients.

Wellbeing & Sustainability

We are committed to the safety and wellbeing of our people and our environment. "I never compromise health and safety to get a job done". As an organisation we encourage wellbeing activities and flexible work practices. We are committed to improve our sustainability practices to reduce harm to our environment.

One Team

We behave in a professional and ethical manner that fosters trust, confidence and goodwill in clients, colleagues, suppliers, and the community. At all times, both in and out of the workplace we:

- Treat others with dignity, fairness, and respect
- Comply with all policies, procedures, laws, and regulations applying to our role and hold ourselves accountable for our actions and behaviour
- Always keep our work in order and comply with Company policies and procedures
- Use of Information and Information Systems

4. Policy

- 4.1 The Code of Conduct outlines the required standard of acceptable conduct and behaviour that we expect of all People in the performance of your duties and interactions at work no matter where you are performing your duties. This required standard of acceptable conduct and behaviour supports our ability to maintain public trust and confidence in the integrity and professionalism of the services we provide.
- 4.2 The Code of Conduct and the behaviours outlined within it are fundamental to Energy Action building healthy, positive, and respectful relationships with our clients. The Code of Conduct also governs the way in which all EA People are expected to relate to one another, external professionals, clients, visitors, and all stakeholders.
- 4.3 The Code of Conduct is not intended to provide a detailed and exhaustive list of what to do in every aspect of work. Instead, it represents a broad framework that will help guide conduct and behaviour in the performance of duties and interactions in the workplace.

5. Responsibilities

5.1 All EA People

5.1.1 Responsibilities

- Be aware of, and comply with, the Code of Conduct
- Model our Values and Perform your defined duties to the best of your ability.
- Report behaviour that may be contrary to the Code of Conduct and required standards of behaviour.
- Inform yourself and comply with all Energy Action policies and procedures relevant to your position.

5.1.2 Personal and Professional Behaviour

- Uphold the highest standards of honesty, integrity, and transparency in the conduct of duties.
- Treat others, with respect, dignity, fairness, and courtesy.
- Exercise best judgment in the interests of Energy Action and our clients.
- Make decisions ethically, fairly and without bias, using the best information available.
- Never act in a discriminatory, harassing, or violent way towards others.
- Never use your position to gain an advantage over or exploit the vulnerability of others.
- Avoid putting yourself or Energy Action in a real or perceived conflict of interest.
- Conduct all business activities in a responsible manner, consistent with ethical obligations of stewardship and in accordance with all applicable laws, policies, and procedures.

- Always strive for the highest health, safety and environmental standards in all facilities, sites, and work areas.
- Use information technology, including internet and email, in a professional and appropriate manner, in accordance with relevant Energy Action policy.
- Never participate in, or assist others to participate in, any illegal and/or criminal activities.
- Comply with any legislative, industrial, or administrative requirements, and all lawful and reasonable directions given by persons in authority.
- Act responsibly in the event of becoming aware of any unethical behaviour or wrongdoing by any other member of the Energy Action team and report such conduct or activities to the appropriate level of management.

5.1.3 Use of Energy Action resources

- Never destroy or take for personal use any items belonging to Energy Action without prior written approval.
- Use Energy Action equipment, funds, facilities, and other resources effectively, economically, and carefully and for the benefit of Energy Action.

5.1.4 Public comment

- Ensure that public comments (either verbal or written) made in a private capacity are not attributed as official comment of Energy Action. In this regard, the use of official stationery, email addresses, text messages or any other electronic identifiers is not permitted for private correspondence or for purposes not related to official Energy Action duties.

5.1.5 Use of Information

- Collect, use, and disclose confidential information only in accordance with Energy Action policy and applicable privacy laws.
- Protect confidential information.
- Only access confidential information when it is required for work purposes.
- Not use confidential information for any unofficial or non-work purposes.
- Only release confidential information if authorised to do so.
- Confidential information is information obtained or developed in the course of the conduct of Energy Action 's business and which if disclosed will or could lead to risk, damage or injury to Energy Action, EA People, clients or third parties.

5.2 People Leaders

5.2.1 People leaders have an additional responsibility to ensure this Code of Conduct is accessible, understood and complied with by all EA people they are responsible for at all times by:

- Taking appropriate steps to resolve conflict that arises in the workplace to ensure a healthy and harmonious work environment.
- Taking appropriate action to address breaches of the Code of Conduct by employees, volunteers, or contractors.

6. Responsibilities after leaving Energy Action

EA People who leave Energy Action must:

- 6.1 Not disclose any official information after leaving Energy Action that was non-disclosable during their engagement
- 6.2 Ensure that public comments (either verbal or written) made in a private capacity are not attributed as official comment of Energy Action.
- 6.3 Not use official stationery, email addresses, text messages or any other electronic identifiers of Energy Action for any purpose.
- 6.4 EA People must be careful in your dealings with former employees and ensure you do not give them favourable treatment or access to personal, confidential, or official Energy Action information.
- 6.5 EA people must not use your position to advance your prospects for future employment, or allow your work to be influenced by plans for, or offers of, external employment which would conflict or compromise in any way the best interests of Energy Action

7. Failure to Comply with the Code of Conduct

- 7.1 Where a breach has occurred, the Company will act objectively, fairly and in accordance with the principle of procedural fairness.
- 7.2 Any such breaches may result in disciplinary action including but not limited to counselling, training, role change or termination of employment.
- 7.3 Any potential or actual breach should be reported to your manager, Executive Manager or Human Resources.
- 7.4 The Company reserves the right to inform the appropriate authorities where it is considered that there has been a fraudulent act or any other breach of the law.
- 7.5 We expect all employees to comply with the letter and spirit of this Code of Conduct Policy.

8. Authority

- 8.1 This Policy has been authorised by the Board of Directors.
- 8.2 Energy Action may amend or vary this Code of Conduct, in its absolute discretion, from time to time.

9. Related and Supporting Policies

This Policy is supported by and linked to specific Energy Action policies. These policies include, but are not limited to:

- 9.1 People are expected to comply with all Energy Action policies and procedures and are not limited to the below list of policies:

This policy is to be read in conjunction with the following Energy Action policies:

- 9.1.1 Conflict of Interest
- 9.1.2 Diversity & Inclusion
- 9.1.3 Work, Health & Safety (WHS)
- 9.1.4 Harassment, Discrimination and Bullying Prevention
- 9.1.5 IT Policy
- 9.1.6 Social Media

- 9.1.7 Securities Trading
- 9.1.8 Privacy Policy
- 9.1.9 Whistle Blower
- 9.1.10 Anti-Bribery and Anti-Corruption
- 9.1.11 Corporate Governance Statement

- Revision History

Version Number	Author	Date	Changes
Version 1	Sarjeet Arkan	4 October 2021	Policy Developed

Approved by the Board of Energy Action Limited on 1 November 2021.