

# Code of Conduct Policy

## 1. Purpose

The purpose of the policy is to provide Denison Gas employees with the standards of behaviour required to ensure that we are seen as an organisation with a reputation of respect and integrity.

## 2. Introduction

The Denison Gas Group Code of Conduct aims to:

- provide clear guidance on the company's values and expectations while acting as a representative of Denison Gas.
- promote a common minimum standard of ethical behaviour, standards and expectations across the group, all business units and locations.
- offer guidance for shareholders, customers, readers, suppliers and the wider community on our values, standards and expectations, and what it means to work for Denison Gas.
- raise employees awareness of acceptable and unacceptable behaviour and provide a means to assist in avoiding any real or perceived misconduct.

We are likely to be faced with situations that are not specifically addressed in this code. When dealing with these, we can ask ourselves the following questions to assist us in determining an appropriate course of action:

- Would I be proud of what I have done?
- Is it legal?
- Is it consistent with Denison Gas's values, principles and policies?
- Do I think it's the right thing to do?
- What will the consequences be for my colleagues, Denison Gas, other parties, and me?
- Are my actions transparent? Is there anyone else who I should make aware of my actions?
- What would be the reaction of my family and friends if they were to find out?
- What would be the impact if rumours started with our stakeholders or employees that Denison Gas was engaged in this practice?
- Do my actions put anyone's health and safety at risk?

The Code of Conduct, detailed in the following pages, is written as a set of general principles in employment and should be read in conjunction with our other HR and employment policies.

### **3. Business Integrity**

#### **3.1 Honesty, Integrity & Fairness**

We endeavour to perform our duties and conduct business in a manner that is honest and of the highest integrity. We strive to maintain our business relationships in a manner which are consistent with principles of respect for others and fairness. We aim to maintain standards that exceed community expectations.

#### **3.2 Reporting Concerns**

Denison Gas is committed to fostering an environment where concerns can be reported without fear of punishment. We will treat all reports seriously and will act appropriately and promptly.

#### **3.3 Public Comment**

As employees, we will not disclose publicly any information about the company, or make public comment on behalf of Denison Gas, or using Denison Gas facilities or equipment, unless required as part of our normal work or as specifically approved by the CEO.

If the media contacts us we will refer this to the CEO.

#### **3.4 Conflict of interest**

We will disclose any real or potential conflicts of interest when dealing with family, friends, or other related parties or entities on behalf of the company. We will make our interests known and seek approval before contracting with any of these parties.

#### **3.5 Compliance with and respect for the law**

Denison Gas and its employees respect the law and act accordingly by observing and respecting the relevant laws, customs and business methods in the environment in which the Company operates.

### **4. Professional Practice**

#### **4.1 Financial Interests**

Denison Gas employees should avoid taking a specific financial interest, or participating in financial activities and arrangements, that could conflict with their obligations of fairness and integrity to the company or its stakeholders, or that could be perceived to.

#### **4.2 Property & Ownership**

We take responsibility for the protection and care of our company assets including:

- Cash, corporate cards and vouchers;
- Plant and equipment eg: cars or machinery;
- Company information;
- Denison Gas products and publications;
- Computers and software;

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- Intellectual property (eg. Copyright, trademarks, patents, registered designs and the right for the company to have its confidential information kept confidential).

We ensure that our actions in relation to company property are honest at all times. If we believe that theft or damage is taking place in the workplace, we will report it immediately to our manager.

To avoid any misunderstanding of our behaviour we should remember to always:

- Seek permission from a senior manager to take company property from the workplace and ensure its removal is documented and authorised.
- Always use company property for what it was intended and not for personal use unless authorised.
- Never assume that damaged stock or goods is not wanted or not valuable to the company.
- Return all assets when leaving the organisation.

### 4.3 Privacy & Confidentiality

We understand that as Denison Gas employees we are placed in a position of trust and are regularly privy to sensitive information. We strive to operate in accordance with the relevant privacy legislation.

We undertake to handle such information in a confidential and sensitive manner and not use this information for personal gain or to share this information either during or after our employment with Denison Gas unless required as part of our normal work.

We will under no circumstances discuss or disclose any confidential Company information. This information includes marketing or strategic plans, pricing, policy, costs and stories. If we are unsure of whether or not a particular piece of information is confidential, we will check with the source.

The Company's records include personal information. Personal information is information or an opinion about an individual whose identity is apparent or can be ascertained from the information or opinion. During the course of its activities, the Company may collect, hold or use personal information about suppliers of goods and services, customers, contractors and prospective and current Denison Gas employees.

We will manage any such personal information in a professional and ethical manner and will not use it for any other purpose or disclosed it outside the Company without the permission of the individual concerned, unless authorised by law.

### 4.4 Other Employment

If we wish to work another job whilst with Denison Gas we agree to obtaining written permission from our manager before undertaking such work and any such work must not represent an actual, potential or perceived threat of conflict of interest.

### 4.5 Personal Advantage

As Denison Gas employees, we will not abuse any benefit or advantage that is not afforded to the public or part of any company sanctioned benefit. Such advantages include discounts, priority

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bookings, access to venues, retail or wholesale sales, restaurant bookings, real estate queues and upgrading of goods and services.

#### **4.6 Gifts & Inducements**

We will not accept gifts or inducements, which could impair our judgement or be perceived to be a conflict of interest, bribe or inappropriate gift.

Similarly, we will not offer bribes or inappropriate payments for the purpose of acquiring, retaining, directing business or receiving any kind of special or favoured treatment for the company.

#### **4.7 Recruitment & Selection**

Our commitment to attracting the best talent is reflected in our rigorous recruitment and selection process, which are based on merit. Our recruitment policies and procedures reflect this commitment.

#### **4.8 Company Reporting**

We are committed to producing complete, balanced, timely, accurate and truthful company data, records and reports. We will be transparent and ensure that issues are raised to an appropriate level on a timely basis.

### **5. Health, Safety & Environment**

Denison Gas aims to provide a safe, healthy, injury free and environmentally sustainable business. We aim to carry out our business activities in a manner consistent with applicable health, safety and environmental laws and regulations for the wellbeing of the environment and our employees, contractors, visitors and customers. We will endeavour to be aware of and follow all Health, Safety and Environment policies and procedures.

### **6. Equal Employment Opportunity and Anti-Harassment**

Denison Gas aims to provide a work environment free from unlawful discrimination and harassment in employment related matters. The Company has EEO, Anti-Harassment and Bullying policies and will operate in accordance with related legislation.

### **7. Compliance with Company Policies**

We will comply with all Company policies as amended from time to time.

### **8. Implementation and Compliance with this Code of Conduct**

#### **8.1 Questions**

If we have any questions about a matter or issue, we should consult with any of the following:

- the CEO
- the Whistleblower Protection Officer
- Human Resources.

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## 8.2 Reporting

We will report all breaches of this Code of Conduct immediately to our manager or any of the following:

- the CEO
- the Whistleblower Protection Officer or
- Human Resources.

Individuals making complaints in good faith will be protected by this code of conduct, however, we understand that disciplinary action may be taken where an allegation is malicious or vexatious.

## 8.3 Non-Compliance

We acknowledge that non-compliance may lead to disciplinary action. Examples of relevant disciplinary action include verbal or written warnings, counselling on misconduct, suspension (with or without pay) and dismissal.

VER*	Approved By	Approval Date
3	The Board	06/03/2022