

# Code of Conduct Policy

## Objective

Beach Energy ("Beach") is dedicated to balancing and protecting the interests of its stakeholders. The Code of Conduct ("Code") sets professional standards to ensure a workplace free from inappropriate or unlawful behaviour, based on the Beach Values. This Code is mandatory for all Beach directors, officers, employees, contractors and service providers working on behalf of Beach and for any company within the Beach Group ("Beach People").

## The Code:

Sets the standards of behaviour that apply to every aspect of Beach's dealings and relationships, both internally and externally. It is underpinned by the policies, procedures, guidelines and other requirements outlined in the management systems adopted by Beach including the Operations Excellence Management System (OEMS) and Business Management System (BMS). These guide the Company and its people to meet those standards with the Board playing a critical role in setting, overseeing and reinforcing the Beach Values and culture.

The Code sets out the mandatory standards required of each person. The expectations within this code extend to all interactions and engagements in connection with work or a work-related event (within or outside of work hours), including online and via social media.

The Code is encompassing of and is underpinned by the Beach Values, 'In Our Element':



DOWN TO EARTH	AIM SKY HIGH	FEED THE FIRE	CREATE THE WAVE
<b>We care</b>	<b>We have freedom to be creative</b>	<b>We are stronger together</b>	<b>We generate momentum for a sustainable future</b>
<b>In action:</b> <ul style="list-style-type: none"><li>We <b>respect and support each other</b> and deliver on our commitments</li><li>We <b>prioritise safety</b> before everything else; for ourselves and each other</li><li>We <b>seek to understand</b> others' perspectives so that we have a positive impact wherever we work</li><li>We <b>give and receive feedback</b> with openness and respect</li></ul>	<b>In action:</b> <ul style="list-style-type: none"><li>We find <b>better ways of doing things</b></li><li>We actively include and <b>value diverse perspectives</b></li><li>We lead new thinking and <b>innovate</b> together</li><li>We <b>find solutions</b> to challenges</li></ul>	<b>In action:</b> <ul style="list-style-type: none"><li>We <b>collaborate early</b>, intentionally and with energy</li><li>We <b>believe in our purpose</b>, and we focus on the right work</li><li>We <b>develop people</b> and celebrate their success</li><li>We <b>ask questions</b> and learn together</li></ul>	<b>In action:</b> <ul style="list-style-type: none"><li>We operate with an <b>owner's mindset</b></li><li>We are <b>resilient</b>, adapting to challenge and change</li><li>We <b>create value</b> by maximising new and emerging opportunities</li><li>We have a <b>growth mindset</b> and learn from mistakes</li></ul>

**SAFETY** takes precedence in everything we do 

In Our Element serves to describe the experience of working at Beach, the type of company we aim to be, and how we go about our work each day to perform at our best. The Beach Values describe behaviours to be demonstrated in interactions with Beach People, joint venture partners, customers, suppliers, regulatory authorities, community members, and other stakeholders.

## **Practical Steps**

To achieve this, we will comply with Beach's policies, procedures, guidelines and management systems and the laws that govern Beach and its operations.

This means:

- Acting in a manner that complies with both the letter and the *spirit of the law*; and
- Familiarising ourselves with the duties and responsibilities under these requirements, and in the context of our roles, maintaining up to date knowledge and understanding of them.

## **Act honestly and with integrity and fairness in all dealings with others**

We aim to operate with the highest standard of honesty, integrity, fairness and professionalism in our operations and dealings with all internal and external stakeholders.

This means:

- Acting in good faith in the context of our role at Beach;
- Providing equality of employment opportunity;
- Treating people with courtesy and with dignity regardless of their differences;
- Protecting and dealing with personal information in accordance with Beach's Privacy Policy;
- Recording and reporting information in an honest, accurate and timely way to ensure Beach maintains current, accurate records to facilitate timely, balanced, accurate statutory reporting and disclosure, and well-informed decision making in all areas of our business; and
- Adopting ethical and lawful business practices including:
  - not giving or accepting any gifts or benefits which may be regarded as undue influence, a bribe, corruption or otherwise improper;
  - not making any political payments, gifts or donations (including attendances at functions and conferences) except as may be permitted under the Political Donations Policy; and
  - not engaging in any anti-competitive behaviour such as price-fixing, bid-rigging, cartel arrangements, or sharing sensitive information with competitors.

## **Avoid or manage actual, potential or perceived conflicts of interest**

A conflict of interest arises when a person is tempted to prioritise their own interests or the interests of others (such as relatives or friends) above the interests of Beach.

This means:

- Complying with Beach's Conflict of Interest policy;
- Identifying actual, potential or perceived conflicts of interest; and

- Disclosing actual, potential or perceived conflicts of interest in Beach's conflict of interest register.

### **Use assets properly and efficiently for Beach's benefit**

This means:

- Using our time effectively and efficiently in the context of our role in Beach;
- Complying confidentiality arrangements aimed to protect any non-public information owned or used by Beach;
- Not using company information for inappropriate trading in Beach's securities that violate insider trading laws or the Share Trading Policy; and
- Using Beach's assets (such as information, equipment or funds) properly and efficiently for Beach's benefit to achieve its objectives, and not for the advantage of others or to cause loss to Beach.

### **Contribute to the wellbeing of key stakeholders**

This means:

- Fostering a climate of innovation and diligence amongst Beach's people by:
  - encouraging personal and professional development to benefit Beach and the individual, and to enable its people to better fulfill their roles in Beach;
  - adopting principles aimed at attracting, retaining and rewarding Beach People who assist Beach to achieve its objectives; and
  - encouraging and supporting a diverse workforce.
- Providing a supportive and flexible environment for Beach People and their families;
- Seeking to deliver shareholder return;
- Giving due consideration to interests and concerns of stakeholders;
- Keeping stakeholders informed about Beach and its key developments;
- Taking necessary steps to identify, manage and prevent workplace injuries and incidents; and
- Ensuring we are medically fit to undertake work and that our performance is not impaired e.g. by alcohol, drugs or fatigue.

### **Seek to be an exemplary corporate citizen**

This means:

- Considering ways to support the social, economic and environmental aspects of the communities in which we operate;
- Conducting operations in an environmentally and socially responsible manner; and
- Fostering constructive relations with indigenous communities and the communities in which we operate.

## **Promote a respectful, inclusive and safe workplace**

At Beach, we are committed to fostering a values-led, positive and supportive environment.

This means:

- Prioritising both physical, psychological and psychosocial health and safety for self and others in the design, management and performance of work;
- Treating everyone with, respect dignity, and courtesy; and
- Calling out and addressing behaviour that is (or has the potential to be) harmful, offensive or in breach of our values.

Behaviours that will not be tolerated include bullying, harassment, discrimination and violence or aggression (threatened or actual). Everyone has a responsibility to prevent, address and report such conduct through established channels.

To maintain a safe and respectful workplace, Beach People may be required to participate in training and awareness programs, support those affected by misconduct, and cooperate fully with investigations.

Managers and leaders have additional responsibilities to set clear expectations, respond promptly and fairly to concerns, and foster a culture aligned with Beach Values. Victimisation of anyone who raises concerns or makes a complaint is strictly prohibited, and all reports will be handled confidentially in accordance with Beach's Grievance & Complaint Resolution Procedure and Disciplinary Procedure.

## **Policies, Procedures, Guidelines and Management Systems**

This Code should be read in conjunction with other Beach Policies and Procedures, which all Beach People are expected to be familiar with and to comply with at all times.

Beach Policies and Procedures can be found on either Beach's intranet or website or can be obtained from the Company Secretary.

## **Compliance with this Code**

Compliance with this Code is mandatory and requires the genuine commitment and cooperation of every person. This includes a responsibility for each person to report any actual or suspected breach of this Code to People & Culture, the Company Secretary or the Chief Executive Officer.

Beach People must not cause or threaten to cause any detriment to any person who makes a report in good faith.

Beach will endeavour to protect the privacy of the person making the report and keep the information reported in confidence so far as the issue reported allows.

Beach also has a Whistleblower Policy under which suspected or actual breaches of this policy may be reported anonymously.

Beach will investigate reports of an actual or suspected breach. All Beach People are expected to assist in any investigation as required. Disciplinary action for a breach of this Code may include termination of employment. In cases of misconduct or a breach that involves criminal activity, a report may be made to the relevant authority(ies).

If there are any questions or issues regarding this Code or Beach's Policies and Procedures, People & Culture or the Company Secretary should be contacted.

### **Application**

This policy applies to all personnel associated with Beach activities

### **Review**

This policy will be reviewed periodically as required, and in any event at least once every three years.