



# Code of Conduct

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Phoslock Environmental Technologies Limited ACN 099 555 290  
(Company)

**Adopted by the Board – 31 March 2022**

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## 1 How we work at PET

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Behaviour that consistently demonstrates our 3C values cultivates trust with each other and our stakeholders. That's why we have our Code of Conduct. It guides our daily work and helps us think about not just what we do but how we do it. It demonstrates how to practically apply our 3C values and how we work as a nimble globally networked team.

As a global company we comply with applicable laws and regulations of the countries in which we operate. Where differences exist between our Code of Conduct and local customs, norms, rules or regulations, we apply the higher standard. Operating with integrity and speaking up if we see something questionable or inconsistent with this code is part of our value of Being Courageous. Applying this Code is part of who we are at PET and is everyone's responsibility.

Each section of our Code of Conduct explains principles for decision-making and our expectations of our team and others who work with us. This Code can't describe or anticipate every situation, so to get help talk with:

- your line leader or
- the Speak Up Line on +61 3 9110 0002. The Speak Up Line is available in Chinese or English

## 2 Application of this Code

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This Code applies to all directors of the Board, as well as all officers, employees, contractors, consultants, other persons that act on behalf of PET, and associates of PET.

Suppliers and business partners will be assessed according to their integrity, reputation and values. This document will also assist suppliers and business partners understand and adhere to PET's standards.

## 3 Our 3C values

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PET's 3C values invite our people to:

### Care

- Care for customers, the environment, our communities, and each other – be curious and find ways to improve experience and impact.
- Keep the safety of customers, agents, partners, contractors, workmates and ourselves front of mind, always.

### Collaborate

- Bring your strengths to work and invite the same of others – offer and receive help. Embrace the diversity that is our strength.
- Listen and communicate openly. Think and adapt together – making decisions weighing risks and opportunities.

### And be Courageous

- Have the conviction that continued focus on the things that make sense in the long run are always worth doing.
- Stand up for Our Culture and speak up if you see something that is not right.

## 4 Speaking up

# Quick Test

If you are in doubt about whether you should speak up, try the Quick Test.

Does it fit with our 3C values?

Safety

Could it directly or indirectly endanger someone or cause them physical or mental harm?

Law

Is it legal and in line with our policies and procedures?

Conscience

Does it fit with my personal values?

Media

If the story appeared in the media, would I feel comfortable with the decision

Family

What would I tell my partner, parent, child or friend to do?

Feel

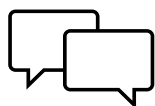
What's my intuition or 'gut feel'? If it feels bad, then it probably is bad.

If you feel uncomfortable or have difficulty answering any of the questions in the Quick Test, you should speak up.

### Speaking up protects everyone

If you think a decision or action does not reflect our 3C values or is not in line with our PET Code of Conduct, you have a responsibility to speak up. You don't need to be directly affected by an issue to raise it. When concerns are raised it helps us identify and address the matter and improve how we work.

We know that speaking up takes both courage and integrity, and we respect this by treating your concern sensitively and committing to investigate where appropriate. There are two ways you can do this:



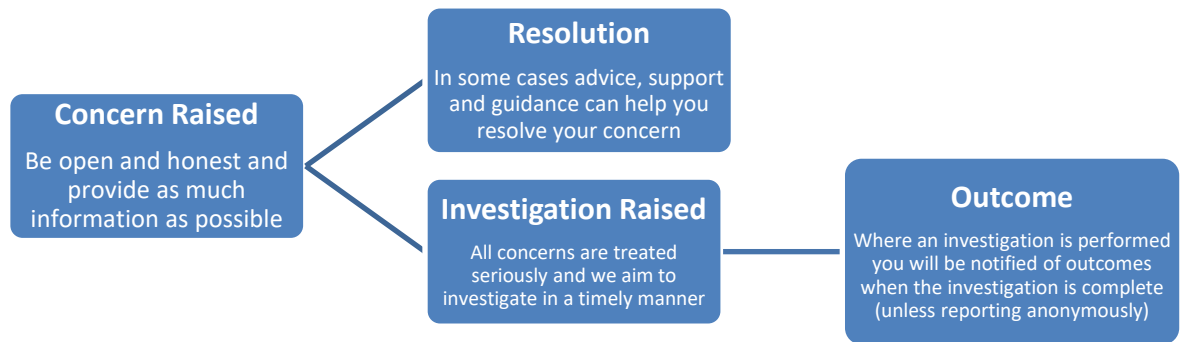
- Your line leader
- The Speak Up Line on +61 3 9110 0002 or email [disclosures@phoslock.com.au](mailto:disclosures@phoslock.com.au)

If a person outside PET speaks up we are committed to treating that concern respectfully. By speaking up, they are helping improve PET and build a relationship of trust with the communities in which we operate.

### Confidentiality and anonymity

When you speak up, the information you provide will be dealt with confidentially. If you wish to remain anonymous, all reasonable steps will be taken to reduce the risk that you will be identified as a result of responding to your concern. This means the information you provide will only be shared where this is necessary for the purposes of the investigation and measures to protect your identity will be put in place as far as possible. You can speak up anonymously by accessing The Speak Up Line online or over the phone.

### What happens when you speak up?



### Zero tolerance for retaliation

It is important to us that you feel empowered and protected to seek assistance or speak up. We don't allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up, or cooperating with an investigation. Retaliation can take many different forms, including threats, intimidation, harassment, exclusion or humiliation. It can also include subtle behaviours, such as withholding information or not providing meaningful work. We consider all forms of retaliation to be a breach of our Code of Conduct. If you feel that you have been retaliated against for speaking up you should report it immediately to your line leader or Matthew Parker Company Secretary.

*Nothing in our PET Code of Conduct, or any other document or procedure at PET prevents you from, or requires approval for, reporting what you reasonably believe is a breach of the law to an appropriate government authority or from seeking legal advice in relation to your rights about disclosing information.*

## 5 Your responsibilities

### Application of this Code

We all have a responsibility to work in accordance with our 3C values, as well as within the law. It is critical you understand our Code of Conduct and how it applies to you.

When we refer to 'you' this includes employees, directors and Board members. We also expect contractors, consultants and others who may be temporarily assigned to perform work or services for PET to follow our Code of Conduct in connection with their work for us. See references in blue at the end of each ethical standard.

We encourage our suppliers, business partners and industry associations to maintain similar standards of conduct. If you are working with our third parties we expect you to hold them accountable.

### Your responsibilities

PET expects that you:

- will be guided in your decisions and actions by our 3C values;
- will act according to our Code of Conduct at all times;
- understand policies, requirements, local standards and procedures that apply to how we work; and
- know how, and when, to speak up.

### Your responsibility as a leader

We know the standard we walk by is the standard we accept. That's why if you are responsible for leading people at PET, it's important you role model our 3C values by:

- demonstrating the positive behaviours described in our PET Code of Conduct;
- providing regular coaching and feedback that is respectful and constructive including recognising employees for demonstrating our 3C values;
- helping all members of the team understand the expectations and practical application of PET Code of Conduct, standards and procedures;
- informing new team members of the expectations in our PET Code of Conduct;
- holding everyone to account for breaching our PET Code of Conduct;
- embedding our Code of Conduct into day-to-day activities and existing processes;
- making decisions that are in the best interests of PET;
- fostering an inclusive culture where everyone feels comfortable to speak up or ask questions without fear of retaliation;
- knowing how to appropriately respond to concerns (including getting help where needed); and
- having zero tolerance for any form of retaliation.

## 6 Our ethical standards

### 6.1 Health and safety

Health and safety is everyone's responsibility, and we all need to look out for one another's physical and mental wellbeing.

As part of our commitment to health and safety, all workplaces should be free from the use of alcohol and illegal drugs, and the misuse of other substances. Alcohol must not be offered or consumed at any PET workplace without prior approval from the CEO or Regional General Manager.

The use of cigarettes, including e-cigarettes, must be confined to designated areas.

Health and safety practices are governed by our policies and standards as well as local standards and procedures. To ensure a safe workplace you must adhere to all relevant requirements. If you are working on, or visiting, a customer site you should familiarise yourself with the standards and procedures that apply and ensure that you adhere to them.

Our leaders are accountable for implementing these requirements and ensuring that supporting systems are in place. Our leaders must provide an environment where everyone feels safe to report any threats to their own safety, or the safety of others.

It is everyone's responsibility to prevent and report workplace-related injuries and illnesses.

You are required to observe all smoking restrictions.

Anyone who visits a PET site must comply with all relevant health and safety procedures. It is important they familiarise themselves with these procedures before they arrive on site.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Comply with relevant health and safety requirements and use all personal protective equipment, and help others who work with us to do the same.</li> <li>• Identify, assess and take steps to control health and safety hazards.</li> <li>• Immediately stop any work that appears unsafe or if the required personal protective equipment is not used.</li> <li>• Speak to your line leader if you have any concerns about your or a colleague's fitness for work or ability to carry out assigned work safely.</li> </ul>	<ul style="list-style-type: none"> <li>• Undertake work unless you are trained, competent, medically fit and sufficiently rested and alert to do so.</li> <li>• Attend the workplace if you have consumed any alcohol.</li> <li>• Undertake work or attend a work function if you are under the influence of drugs (legal, prescribed or illegal).</li> <li>• Take prescribed or non-prescribed drugs without understanding and declaring the impact on your ability to safely do your job.</li> <li>• Consume alcohol on PET sites, unless an event has been pre-approved by the CEO or Regional General Manager.</li> </ul>

<ul style="list-style-type: none"> <li>• Handle and dispose of all materials properly, safely and lawfully.</li> <li>• Be prepared for emergencies by making sure you, and any of your visitors, are familiar with emergency procedures.</li> <li>• Report any accidents, injuries, illnesses, unsafe or unhealthy conditions, incidents, spills or release of materials to the environment to your line leader.</li> <li>• Seek help if you or a colleague may have a drug or alcohol dependency.</li> <li>• Act on all complaints or warnings raised with you.</li> </ul>	<ul style="list-style-type: none"> <li>• Smoke in undesignated areas on site.</li> <li>• Have illegal drugs on PET sites or property in your possession.</li> <li>• Bring firearms onto PET premises.</li> <li>• Assume that someone else will report a safety risk or speak-up.</li> <li>• Forget our commitment to health and safety when consuming alcohol at a Company function where alcohol has been approved.</li> </ul>
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## 6.2 Workplace equality and inclusion

We will always employ, develop and promote based on merit and we do not tolerate any form of unlawful discrimination. Unlawful discrimination against a person based on personal attributes unrelated to job performance, such as race, gender identity, sexual orientation, intersex status, physical or mental disability, relationship status, religion, political opinion, pregnancy, breastfeeding or family responsibilities is prohibited.

We strive to be a nimble, networked, global team. You should consider the impact your actions may have on others and treat everyone fairly and with respect. Always make yourself aware of relevant cultural considerations and demonstrate respect when working with colleagues from diverse cultural backgrounds or travelling to different locations. It's also important to support your colleagues to speak up if they believe they are experiencing sexual harassment, harassment or bullying. If you witness this behaviour, you have a responsibility to speak up.

### What is harassment, sexual harassment and bullying?

*Harassment is an action or behaviour that would be reasonably viewed as humiliating, intimidating or offensive.*

*Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, which may make a person feel offended, humiliated and/or intimidated. It may include unwelcome touching, suggestive comments or jokes, insults of a sexual nature, non-consensual acts of a sexual nature, or sending sexually explicit emails or messages. The impact of the action or behaviour on the recipient, not just the intent, is considered when determining whether the action or behaviour is harassment.*

*Sexual harassment is not always obvious, repeated or continuous. Whilst bullying is characterised by repeated behaviour, sexual harassment can be a one-off incident.*

*Bullying is repeated unreasonable behaviour directed towards a worker (or group of workers) that creates a risk to health and safety. Unreasonable behaviour is behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating, offensive or threatening.*

*Where local laws conflict with our standards, leaders need to provide clear instructions regarding acceptable behaviours and the application of laws. In some cases, laws may take precedence over our standards.*

*When working with PET, all parties must respect that PET values a diverse and inclusive workplace. We expect that everyone who works at PET will be treated with respect.*

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Demonstrate fairness, trust and respect in all your working relationships.</li> <li>• Be open to flexible work arrangements, balancing business, team and personal needs.</li> <li>• Challenge inappropriate, exclusionary or discriminatory behaviour, whether it is intentional or not.</li> </ul>	<ul style="list-style-type: none"> <li>• Behave in a way that would be reasonably viewed as offensive, insulting, intimidating, malicious or humiliating.</li> <li>• Make jokes or comments about an individual's characteristics – including their race, gender, ethnicity, religion, sexual orientation, age, physical appearance, disability or other personal attribute.</li> </ul>

<ul style="list-style-type: none"> <li>• Make employment related decisions, including recruitment, promotion, training, development, and remuneration free from bias.</li> <li>• Respect the human rights of our workforce and those we work with including suppliers.</li> <li>• Treat everyone equally regardless of their industrial association or participation, or non-participation in industrial activities.</li> <li>• Conduct yourself in a way that upholds and promotes PET's Diversity and Inclusion Commitment and our value of Collaboration.</li> </ul>	<ul style="list-style-type: none"> <li>• Distribute or display any offensive material including inappropriate photos or cartoons.</li> <li>• Partake, or facilitate, hospitality or entertainment of an inappropriate nature (for example sexually oriented) or at inappropriate venues. This includes accepting or facilitating gifts of an inappropriate nature.</li> <li>• Engage in physically or socially intimidating behaviours.</li> <li>• Unlawfully discriminate in favour of, or against, someone based on personal attributes unrelated to job capabilities or performance.</li> </ul>
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### 6.3 Business travel

When travelling for business, or if your job involves business dealings with other countries, you should always respect the laws and customs of those countries. You must ensure that your behaviour always reflects positively on your own reputation and the reputation of PET.

Before you travel, you should understand the associated safety, security and health risks and follow local pre-approval requirements. Make sure you follow any vaccination or other travel medicine recommendations, and keep up to date with the security risk rating of your planned destinations, generally communicated by your government.

You must never accept offers of sponsored travel or accommodation. If there is a valid business purpose for attending an event, PET will pay any travel and accommodation costs.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Have your travel approved before you leave.</li> <li>• Prepare for international travel by seeking destination-specific health and safety advice.</li> <li>• Claim only legitimate business expenses that are supported by receipts or tax invoices.</li> <li>• Comply with global immigration rules when travelling internationally, and ensure that employees who report to you also comply.</li> <li>• Familiarise yourself with local behaviours, practices and customs, and be sensitive to actions or behaviours that may be acceptable in one culture but not in another.</li> <li>• Check to see that ride sharing services available in your destination are legal.</li> </ul>	<ul style="list-style-type: none"> <li>• Volunteer or accept financial compensation from an airline for flight changes or downgrades. However, with an overnight delay due to issues with an airline, it is reasonable to accept offers of accommodation and transfers from the airline to compensate for the need to stay overnight to catch the next available flight.</li> <li>• Travel if you have a medical condition prohibiting travel, including pregnancy, unless you have first obtained written approval from your own doctor.</li> <li>• Submit or approve an employee expense report without a receipt for each item.</li> <li>• Authorise your own expenses or the expenses of an employee more senior than you, unless you are given a specific delegation of financial authority.</li> <li>• Pay for the expenses of an employee more senior than you, unless you are given a specific delegation of financial authority.</li> </ul>

### 6.4 Environment

We are committed to operating in an environmentally responsible manner when it comes to all aspects of our business including manufacturing, application and testing.

Consistent with PET's purpose, you must understand the potential environmental impacts of the tasks you perform and look at ways you can avoid negative impacts to air, water, land



and biodiversity. Where actual or potential environmental incidents or spills occur you must report these, regardless of severity.

Those who work with us must comply with our environmental requirements.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>Identify, assess and take steps to avoid and minimise environmental impacts associated with your work.</li> <li>Ensure contractors, suppliers and partners are selected using PET processes and that they are appropriately trained.</li> <li>Identify and report opportunities to reduce greenhouse gas emissions, including improving energy efficiency.</li> <li>Identify and report opportunities to improve water management, including water efficiency and avoiding pollution.</li> <li>Immediately stop any work that may contribute to a significant environmental or community incident.</li> <li>Report to your line leader any actual or potential impact to the environment or communities from an accident, incident, spill or release of material.</li> <li>Encourage our suppliers, partners, customers and other third parties to minimise their environmental impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Ignore a potential or actual environmental incident, or assume that someone else will report it.</li> <li>Undertake work that has the potential to impact on the environment unless you are trained and competent to do so and controls are in place to minimise environmental impacts.</li> <li>Engage contractors, suppliers, customers or partners without an assessment that takes into account their environment and community impacts, risks, controls and performance.</li> </ul>

## 6.5 Working with governments

Governments and municipalities are often PET customers. Government policies and stance on environmental issues influence community attitudes and the context in which decision-makers choose environmental solutions. Our business is directly affected by government decision making, so it's important we have open and constructive relationships with them.

We regularly share information and opinions with governments on issues that affect our operations, our industry and environmental stewardship more generally. This exchange of information and opinions enables informed decision making by both governments and our Company and advances understanding of environmental impacts and considerations.

You need to maintain honest relationships with governments and their agencies, officials and personnel.

You must speak with the CEO before proceeding and obtain the CEO's approval for any submissions to government on behalf of PET. This includes responses to government inquiries and submissions or papers on proposed legislative reforms.

The CFO and Company Secretary's approval must also be obtained before submitting an official response on behalf of PET to an anti-corruption, competition, sanctions, state secrets or financial markets enforcement agency.

All information provided to governments and third parties on behalf of PET must be accurate and appropriate for the purpose.

### Government events and political activities

You may be able to participate in events or activities organised by a political party, politician, elected official or candidate for public office if your involvement is for business, related to policy briefing, and the activity is supported by your line leader. Events or activities cannot be related to political fundraising. As per PET's Antibribery and Corruption Policy, you must not make political donations on behalf of PET.

Activities that require registration and approval in advance include:

- payment for tables at functions or events with a clear business purpose which are sponsored by, or associated with, any political party, politician or political candidate;
- sponsoring research by 'think tanks' affiliated or linked to political parties;
- involvement with any event organised by, or on behalf, of a political party for which a fee is paid and is not related to, or perceived as, political fundraising.

We recognise employees' rights and respect their choices to participate as individuals in the political process provided you make it clear that you are not representing PET.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Talk to the CEO before you engage with government officials on public policy or issues that could impact PET's reputation or licence to operate.</li> <li>• Be truthful, accurate and cooperative when dealing with government officials.</li> <li>• Comply with all applicable laws and regulations.</li> <li>• Consider potential corruption risks when dealing with government officials.</li> <li>• Seek approval for involvement in any business-related event or activity organised by, or on behalf of, a political party or candidate and be transparent when undertaking such activities.</li> <li>• Exercise particular care when PET is starting new business ventures or investing in new companies or countries.</li> </ul>	<ul style="list-style-type: none"> <li>• Authorise, offer, give or promise anything of value directly or indirectly to a government official to influence official action. This includes engaging in bribery, facilitation payments or secret commissions as defined under PET's Antibribery and Corruption policy, as well as offering, providing or accepting gifts, hospitality or travel in a manner contrary to that policy.</li> <li>• Encourage or put pressure on anyone else to do any of the above.</li> <li>• Make a political donation on behalf of PET.</li> <li>• Attend an event or activity during work hours or on behalf of PET which is intended for political fundraising.</li> <li>• Attempt to obstruct the lawful collection of information, data, testimony or records by appropriately authorised government or regulatory officials or hinder the lawful and proper provision of such information by another employee.</li> <li>• Take retaliatory action against anyone who lawfully and properly cooperates with government agencies.</li> <li>• Accept information about a government's competitive selection of a supplier or competitor's bid or proposal (unless the government has specifically and lawfully authorised the release of the information).</li> <li>• Engage or pay a business partner knowing or suspecting they may do any of the above.</li> </ul>

#### Our expectations of others who work with us

When you work with PET please make sure you are familiar with our requirements for engaging with governments. If you are conducting business on behalf of PET you must not jeopardise any of our government relationships. Ask your primary contact for more information about how we work with governments.

## 6.6 Anti-corruption

Our commitment to operating with integrity is part of who we are and what we do every day. We prohibit bribery and corruption in all our business.

Corruption misallocates resources, reinforces poverty, undermines the integrity of government and community decision making, and results in waste of the opportunities that arise from resource development. Compliance with anti-corruption laws is essential to protect PET's reputation and to preserve our licence to operate. All our employees, contractors, directors (executive and non-executive) of our Boards, and third parties we deal with, including our suppliers, are required to comply with anti-corruption laws. No one has

the authority to waive this requirement. Criminal penalties could result where anti-corruption laws are not respected. Any concerns regarding corruption must be reported immediately.

You must not authorise, offer, give or promise anything of value, directly or indirectly (for example, through a third party), to anyone to influence them in their role, or to encourage them to perform their work disloyally or improperly. You should never make facilitation payments which are payments to government officials for routine services that are legally available. You must not engage in facilitation payment, bribes or secret commissions except to avoid an immediate threat to your own, or someone else's, safety.

You must not use PET or customer property, or information, your position or opportunities which arise from these to improperly gain benefit for yourself or for another party or to cause detriment to PET or its' customers.

You must get pre-approval before:

- offering anything of value to an external person;
- engaging a supplier who will interact with others on our behalf;
- offering to undertake a community donation or project;
- offering to sponsor an event.

**Gifts, hospitality, and travel – what is acceptable?**

*When you offer or receive anything of value from an external person (gifts, hospitality or travel), the item must:*

- *only be offered or provided for a legitimate business purpose;*
- *not be offered or provided to improperly influence or reward action;*
- *not be cash, loans or cash equivalents;*
- *be legal under local laws;*
- *be of reasonable and modest value (when considered in isolation and in the context of other gifts, hospitality or travel);*
- *provided in an open and transparent manner;*
- *be permissible, and within the PET monetary limits and disclosure requirements; and*
- *not be capable of causing reputational damage to PET.*

*You should never ask for gifts, hospitality or entertainment of any kind from anyone we conduct business with, including suppliers, customers, community partners or governments.*

*Generally speaking, you should reject offers of travel and accommodation from external parties. If there is a valid business purpose to attend an event or function, PET will pay for travel and/or accommodation costs.*

*See PET's Antibribery and Corruption Policy for more detail on what is acceptable and not acceptable in terms of gifts, hospitality, and travel.*

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Record all transactions accurately and in reasonable detail to reflect their true nature.</li> <li>• Understand the role and interests of the person who you are dealing with.</li> <li>• Provide accurate and complete information when seeking pre-approval.</li> <li>• Get pre-approval before offering or giving anything of value, a commercial sponsorship or a community donation or project.</li> <li>• Act in the best interests of your health and safety.</li> <li>• Immediately report any corruption concerns.</li> <li>• Familiarise yourself and adhere to the standards set out in this code and PET's Antibribery and Corruption Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Offer, promise, give or approve anything of value (including a daily allowance or per diem, cash or cash equivalent) of any kind to a government official to influence official action, including facilitation payments without prior authorisation from the CFO and Company Secretary. This also applies to a political party, elected official or candidate for public office.</li> <li>• Offer, promise, give or approve schemes which give an improper benefit to anyone.</li> <li>• Establish a hidden or incorrectly recorded fund for prohibited payments.</li> <li>• Use personal funds, divide payments, or hide activity which would otherwise need pre-approval.</li> <li>• Use a supplier if you are concerned they will engage in corrupt or improper conduct on our behalf.</li> </ul>

### Our expectations of others who work with us:

We expect everyone who works with us to share our commitment to integrity in all business dealings and in providing services to us.

## 6.7 Supplier relationships

Relationships with suppliers (including vendors, contractors and consultants) make a significant contribution to the success of our Company, and we want to make sure our suppliers have strong values and standards of behaviour. Suppliers who act illegally or unethically can affect our financial performance and profitability, significantly impact our reputation and potentially expose our Company and our employees to criminal or civil penalties. To avoid this, we seek to work with suppliers who are willing to adhere to similar values as our own.

You should always be careful when choosing a supplier and encourage them to uphold our standards and contribute positively to our reputation. Only seek suppliers who share our commitment to:

- lawful business practices;
- high standards of business conduct;
- management practices that respect the rights of all employees and local communities;
- minimising impacts on the environment; and
- providing a safe and healthy workplace.

If there is any doubt about the supplier, or potential supplier's, integrity or ability to perform the contract, you should address these issues immediately.

All procurement decisions should be based on the best value received, taking into account factors such as safety, price, quality, performance, history and suitability to meet PET standards. You should be satisfied that the supplier is reputable, competent and qualified to perform the work for which they are being hired, that they will operate safely and ethically, and that the compensation sought is reasonable.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Seek to obtain competitive bids and question the appropriateness of a sole source request.</li> <li>• Award business based on merit, qualifications and experience using objective selection and evaluation criteria</li> <li>• Give consideration to the potential supplier's health, safety, environment and community performance, reputation, conduct, integrity, qualifications and experience, creditworthiness and ability to meet PET standards.</li> <li>• Make sure suppliers are competent and qualified and that compensation sought is reasonable.</li> <li>• Before entering into a contract or commitment ensure you have all appropriate internal approvals.</li> <li>• Help our suppliers (and their subcontractors) understand and follow our Code of Conduct.</li> <li>• Make sure that agreements clearly state the services or products to be provided, the basis for earning payment/ the rate or fee.</li> <li>• Conduct regular reviews of supplier relationships and performance.</li> </ul>	<ul style="list-style-type: none"> <li>• Award or influence the award of business to a supplier you have a direct or indirect financial interest in or is in anyway associated with a close relative or personal relationship.</li> <li>• Appoint or influence the appointment of a supplier who is a close relative or with whom you have a personal relationship.</li> <li>• Suggest or directly request a personal gift, hospitality or anything of value from a supplier.</li> <li>• Commit PET by signing a supplier's contract or any supplier documentation unless you are authorised to do so.</li> <li>• Use suppliers who supply unsafe or environmentally irresponsible products or services, breach laws or regulations, use child or forced labour.</li> <li>• Give one supplier's confidential business information (for example, proposed rates or winning bid information) directly or indirectly to another supplier.</li> <li>• Ignore warning signs that a supplier may be engaging in inappropriate behaviour.</li> <li>• Approve a purchase requisition that does not meet PET requirements.</li> </ul>

<ul style="list-style-type: none"> <li>• Verify that invoices clearly and fairly represent goods and services provided. Raise queries about unclear or excessive charges.</li> <li>• Make payments only to the person or organisation that actually provides the goods or services.</li> <li>• Speak up about any activity by a supplier that is inconsistent with our Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>• Allow a representative of a supplier to approve an invoice for that supplier.</li> <li>• Knowingly enter into any fraudulent or otherwise illegal transactions or fail to report them as soon as you suspect such arrangements may exist.</li> </ul>
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## 6.8 Conflicts of interest

Operating with integrity is part of our 3Cs culture. It means that we must always be able to demonstrate that all decisions have been made in the best interests of PET and free from personal bias. This means that we need to manage any actual, perceived or potential conflicts of interest.

### What is a conflict of interest?

*A conflict of interest exists where loyalties are divided, ie. when an employee's position within the Company and their financial, or other personal interests affect, or could affect, or have the appearance of affecting, their judgement, objectivity or independence. For example if you or your relatives or associates have a personal or commercial interest which may interfere, or be perceived to interfere, with the performance of your duties and responsibilities to the Company, making it difficult to perform your role objectively and effectively. It is imperative that you are able to manage a conflict of interest when it arises.*

*Common examples of actual, perceived or potential conflicts of interest include:*

- *pursuing, awarding or maintaining PET business opportunities for personal gain or the benefit of close relatives or friends;*
- *holding outside jobs or affiliations, including directorships;*
- *holding investments directly or indirectly in businesses or assets that are contracted to do business for or on behalf of PET;*
- *receiving money, property, services or other forms of financial personal benefits from suppliers or other third parties doing, or proposing to do, business with PET;*
- *influencing the results of a bid or tender;*
- *offering jobs or affiliations to close relatives or friends;*
- *offering or accepting more than a modest amount of gifts, hospitality and entertainment;*
- *accepting sponsorships from providers or third parties who are involved at your site or in your area of business.*

You must act in the best interests of the PET. Nothing you do, professionally or privately, should conflict with your responsibilities to PET, compromise the quality of your work performance or jeopardise your ability to make impartial business decisions in PET's best interest.

To safeguard the confidence of the Company's key stakeholders in the Company's integrity, it is paramount that you do not allow personal interests or the interests of relatives or associates to conflict with the interests of the Company. You must avoid participating in decisions and activities which may conflict, or be perceived to conflict, with your duties and responsibilities to the Company. This means you excuse yourself from any decision making and ongoing oversight process where you have an interest that influences, or could be perceived to influence, your ability to make objective decisions for PET. This is important as an unmanaged conflict of interest could encourage unethical behaviour and lead to fraud.

You should avoid business dealings and personal relationships that could cause conflicts of interest. Remember, some relationships can create the appearance of a conflict, even if you don't think there is one. Conflicts may arise during the course of a normal business relationship due to a change in circumstances.



✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Conduct business in a professional, impartial and competitive manner.</li> <li>• Avoid business dealings and personal relationships that could cause, or create the appearance of, a conflict of interest.</li> <li>• Excuse yourself from any associated decision making and ensure there is a documented course of action in place.</li> <li>• Get appropriate approval from the CEO and CFO and Company Secretary (or the Board if you are a director) before accepting an officer or director position with another organisation. (Regardless of whether the position is paid or unpaid.)</li> <li>• Do not be involved in any other company or business or organisation as agent, employee or consultant, whether paid or unpaid, without obtaining approval first from the CFO and Company Secretary or the Board (if you are a director).</li> <li>• If you are involved in a conflict or possible conflict, or become aware of a conflict, you must tell the Company Secretary or the Board (if you are a director) as soon as possible.</li> <li>• Use good judgement when deciding to accept gifts, hospitality and entertainment.</li> <li>• Excuse yourself from any decision-making process where you have an interest that could influence your ability to make an objective decision.</li> <li>• Think carefully before investing in a competitor, customer or supplier of PET and consider if the investment could compromise your objectivity.</li> <li>• Become familiar with and act in accordance with PET's Related Party Transactions policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Hold positions or investments in organisations that have business dealings with PET if you are in a position to influence transactions or if the relationship itself creates an actual, potential or perceived conflict of interest.</li> <li>• Enter into any arrangement or participate in any activity that would be likely to negatively affect PET's reputation.</li> <li>• Hire, promote or directly supervise a close relative, unless this has been authorised.</li> <li>• Appoint or award business to any party that you are personally or financially associated with.</li> <li>• Misuse PET resources (including information) or your position of influence at PET to promote or assist an external activity or party.</li> <li>• Interfere in the fair and transparent operation of bid or tender activities.</li> <li>• Personally pursue or undertake any opportunities in which PET could have an interest.</li> <li>• Accept gifts, hospitality, entertainment or other favours from any organisation you are evaluating in a bid or tender with PET.</li> <li>• Accept gifts, hospitality or entertainment of an inappropriate value or nature (for example, sexually oriented) or at inappropriate venues.</li> <li>• Accept or request personal discounts or other benefits from suppliers, service providers, customers or other third parties due to your association with PET that the general public or your peers do not receive, unless this has been otherwise approved.</li> </ul>

#### Our expectations of others who work with us

When you work with PET, we expect you to respect our employee's obligations to operate free from bias. You should never put our employees in a position where they have, or could appear to have, a conflict of interest.

## 6.9 Truthful reporting

We need to be truthful in all our reporting to make sure we maintain the trust of our stakeholders.

All data we create and maintain must accurately reflect the underlying transactions and events. There is never a justification for falsifying records, misrepresenting facts or engaging in any other fraudulent behaviour. All financial transactions must be evidenced by appropriate source documents, verified for their validity and accuracy, properly authorised and accurately and completely recorded in the relevant accounts, systems and records. This includes, but is not limited to, bid and tender evaluation records, purchase orders, maintenance reports, receiving documents, invoices, travel and expense records, journal entries, timesheets and tax filings.

If you are responsible for reporting information, whether financial or non-financial, you must make sure there are adequate internal controls to achieve truthful, accurate, complete, consistent, timely and understandable reports. You should only report accurate data and information regarding PET or its business activities. You need to understand and comply

with all applicable financial, regulatory and other applicable reporting requirements, laws and regulations in the relevant jurisdiction. If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information, you must report it immediately.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Cooperate with our internal and external auditors and disclose all pertinent information that could reasonably impact the results of an audit.</li> <li>• Report any actual or suspected irregularities or weaknesses in relation to internal controls, accounting or reporting.</li> <li>• Speak up immediately about any suspicions of fraud.</li> <li>• Keep accurate, complete and true Company books, records, accounts, documentation and reports in accordance with applicable laws, regulations, standards and procedures.</li> <li>• Protect PET records from unauthorised access, change, dissemination or destruction.</li> <li>• Manage the retention of records in accordance with PET's Document Management Policy.</li> <li>• Accurately record work time relating to PET and all leave taken.</li> <li>• Make sure no undisclosed or unrecorded account, fund or asset is established or maintained.</li> <li>• Make sure you only submit and approve legitimate and reasonable expenses that are supported by valid receipts and invoices.</li> </ul>	<ul style="list-style-type: none"> <li>• Falsify any record or make a false or misleading entry including omitting any information.</li> <li>• Misstate your qualifications, experience or achievements.</li> <li>• Circumvent review and approval procedures.</li> <li>• Allow others to do anything that would compromise the integrity of PET's records or reports.</li> <li>• Allow someone else to log on and operate systems and applications using your ID and user access rights.</li> <li>• Disclose or disseminate confidential or commercially sensitive information without prior authorisation.</li> <li>• Dispose of documents and records without knowing what is being discarded or whether they must be kept for legal reasons.</li> </ul>

#### Our expectations of others who work with us

If you are responsible for reporting on behalf of PET, we expect that the reports and information are transparent and reflect the underlying transactions and events as outlined in this section.

### 6.10 Protecting our assets

We all have an obligation to protect the Company's assets and use them for their intended purpose.

Assets include physical and non-physical property, such as equipment, inventory, technology, money, intellectual property (IP) and Company information and data. Competitively sensitive and proprietary information are also considered assets and include:

- operational data, such as production and maintenance data, supplier information and pricing and data related to our equipment;
- strategic and marketing plans;
- pricing, financial plans and forecasts;
- customer information including water body testing and monitoring data;
- research and other technical data.

You are responsible for appropriately using and safeguarding PET's assets. You are also expected to respect both the physical and non-physical assets of others, and never knowingly damage or misappropriate those assets. You should never share sensitive Company information without authorisation from your line leader.

You should do what you can to prevent theft, misappropriation, damage or misuse of any of our assets. This includes not allowing physical assets to be destroyed, disposed of, sold, loaned or donated without appropriate approvals and preventing and detecting fraud. Fraud is any intentional act of deception which is undertaken for personal or third-party gain and which may result in loss to PET or another party. Examples include false statements, obtaining a personal commission for awarding work, falsification of expense claims, misuse of PET information or theft.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Use our assets for their intended purpose.</li> <li>• Protect our assets from waste, damage, misuse, loss, fraud and theft.</li> <li>• Report any potential waste, damage, misuse, loss, fraud or theft of our assets to your line manager (eg. loss of briefcase or computer).</li> <li>• Prevent non-authorised personnel from accessing our facilities, information, data or other assets, where possible and safe to do so.</li> <li>• Return PET assets and property immediately upon request by the Company</li> <li>• If you are required by an authority to provide confidential information, you must notify the Company Secretary.</li> </ul>	<ul style="list-style-type: none"> <li>• Use PET's assets for personal gain.</li> <li>• Take physical property or information assets belonging to PET for personal use.</li> <li>• Enter into any fraudulent or illegal transactions or fail to report any fraud you are aware of.</li> <li>• Share confidential information including after your engagement with PET ends unless legally required.</li> <li>• Take any action that undermines the integrity of vendor or customer data in our systems.</li> <li>• Permit unauthorised entry to a PET site or office or access to our information technology.</li> <li>• Ignore security complaints or an inadequate security procedure that may present threats to either PET employees or assets.</li> </ul>

#### Our expectations of others who work with us

We expect those who work with us to protect and not misuse our assets. If there is any uncertainty about the use of a PET asset, please ask your primary contact.

### 6.11 Intellectual property

Intellectual property (IP) rights cover a variety of things, including inventions and innovations, trademarks, designs, and copyright in things such as text, images, formulae, drawings and software. IP can also refer to information or ideas that are confidential and commercially valuable, and also to data. PET both owns IP and licences IP from third parties. New IP is created every day in our operations. This can be copyright in new documents or software code, innovations or discoveries from our exploration or research and development, or from work done with suppliers to improve or adapt their products or in conjunction with partners to develop new products and solutions. IP rights have financial value just like other PET property. PET also has strategic value: we can stop others from copying PET's IP or we can obtain a licence to use other people's IP in our business to gain a competitive edge.

The value of our IP can be lost by:

- improper disclosure or use;
- inappropriate contractual terms;
- failing to follow necessary formalities for protection, such as registration.

Misusing other people's IP could result in costly legal disputes that may impede our operations and may also damage PET's reputation.

You should always:

- safeguard PET's IP;
- respect the IP rights of others (for example, our suppliers and competitors).

To safeguard our IP, never disclose confidential PET IP without authorisation. This applies during and after your employment with PET. If there is a legitimate reason to share PET's



confidential information — such as where required to work with a supplier — you must have your line leader's prior approval and a written confidentiality agreement with the other party.

You should always use PET's standard contracts when contracting with a supplier unless the CFO has approved alternative terms.

If you create new IP, such as innovations and improvements to our processes, keep it confidential and discuss with the CFO and the Group Manager Product Solutions if any other protection is required. The product of any work performed while you are with PET, or on behalf of the PET, or using PET property (including all intellectual property rights created in connection with that work) belongs to PET.

If you access a third party's IP, only use it as permitted in writing by that party (for example, in a contract with a supplier), or otherwise as permitted by law. Before you copy or share something provided by a third party or deploy new technology, always check whether a third party's IP rights might be infringed.

If using IP developed between PET and a business partner, always check with the Group Manager Product Solutions as to the IP standards that apply.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Enter into a confidentiality agreement with a third party before starting negotiations or any other engagement with a person outside PET who may receive or access PET's confidential IP or information.</li> <li>• Be aware of what information is confidential and ensure your colleagues are also aware (for example by marking documents). Only give confidential information to people who need to know it.</li> <li>• Use PET's standard contracts wherever possible when contracting with Suppliers, and only depart from PET's standard IP and confidentiality terms after consulting with the CFO.</li> <li>• Keep any new IP created, such as innovations or improvements to our processes, confidential and check with the CFO and the Group Manager Product Solutions if any additional protection is required.</li> <li>• Check that there are no third party IP rights that may be infringed before you copy, share or deploy new technology or processes.</li> <li>• Use a third party's IP only as permitted in writing by that party (for example in a contract with a supplier) or otherwise as permitted by law where you have advice from the CFO.</li> <li>• Use IP developed by PET and a business partner familiarise yourself with the standards and limitations that apply to use of the IP with the Group Manager Product Solutions.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclose PET's IP without first obtaining permission from your one-up manager and, if the IP is confidential, making sure the recipient has a legal obligation to keep the information confidential (for example under a confidentiality agreement).</li> <li>• Bring to PET any confidential information, including documents or computer records, from prior employers or clients without their written permission.</li> <li>• Share, copy or deploy a new technology or process without first ensuring you are not infringing a third party's IP.</li> <li>• Use third parties' copyright materials (for example photographs, text, audio or video downloaded from the internet) or trademarks in materials you are producing including for use on PET intranet sites, without first obtaining permission from the copyright or trademarkowner.</li> </ul>

## 6.12 Cybersecurity and use of electronic equipment

All PET hardware, software and data is the property of PET, this includes data stored on both personal and PET devices (such as mobile phones, iPads and computers). The safeguarding of our technology systems and data is the responsibility of all employees and anyone who conducts business on behalf of our Company. The use of PET technology and systems will be monitored, reported and, where required, intercepted or blocked without notice to mitigate risk and comply with relevant laws, regulations and standards. Data stored on PET technology systems may be accessed, reviewed or disclosed for the purposes of

maintenance, business needs or to meet legal or policy requirements. Inappropriate use of technology or data may expose our Company to risks, including viruses, security breaches, theft or loss of PET property or reputational damage.

You are provided with the technology and data you need to undertake work for PET. You must safeguard and use technology and data securely and appropriately, and protect them against damage, loss, theft, alteration and unauthorised access. You must not use our technology or data to commit cybercrime, duplicate or sell software or media files, share your account password, use technology or data for non-PET business purposes or cause reputational damage to PET.

If you use our technology and data inappropriately, or inappropriate material is accessed or stored using our systems, disciplinary action may be taken and civil or criminal authorities may be notified. Inappropriate material includes pornographic or explicit images or text, materials promoting violence, hatred, terrorism or intolerance of others, or any other material that is deemed obscene or abusive.

You should never transfer, publish, remove or delete PET data or intellectual property without authorisation. Moderate personal use of PET technology is permitted. Moderate personal use does not impact your ability to perform your role or affect your commitment to PET. However, it is important to recognise that all communications undertaken through PET's Electronic Equipment (including, email, text messages and instant messages) and all internet sites accessed by you will be treated as work related.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>Treat emails and other electronic forms of communication as official records and only use authorised applications to send these messages.</li> <li>Use authorised applications for business communications or to conduct business activities (i.e. do not use unauthorised applications for documenting or agreeing business transactions)</li> <li>Connect PET devices to our corporate network at least once a month to receive security updates.</li> <li>Make sure your personal devices contain the latest security updates.</li> <li>Return PET equipment and all PET information assets upon termination of your employment or contract.</li> <li>Report the damage, loss or theft of PET equipment or data to your line leader.</li> <li>Make sure hardware, software and data for which you are responsible are protected from unauthorised access.</li> <li>Notify your manager if you've received a suspicious email by identifying the email as phishing.</li> <li>Secure laptops to prevent theft and lock your screen if leaving it unattended.</li> <li>If confidential information inadvertently comes into your possession (eg. email wrongly sent), it should be returned immediately and no copy retained by you.</li> <li>Return or transfer the custody of all relevant business records if you change your job within the Company or if you leave PET. Do not keep personal copies.</li> </ul>	<ul style="list-style-type: none"> <li>Divulge your PET system passwords, write or store passwords in clear text or reuse passwords across multiple systems.</li> <li>Allow someone else to log on and operate systems and applications using your ID and user access rights.</li> <li>Leave technology or mobile devices unattended in public places.</li> <li>Engage in fraud, commit a crime online or fail to report a fraud that you may know of.</li> <li>Install software on or connect hardware to PET devices without authorisation.</li> <li>Open attachments or click links in emails that you've received from unknown senders</li> <li>Deliberately access, store, send, post or publish inappropriate material, or ignore others doing so.</li> <li>Access applications or systems for which there is no business justification.</li> <li>Store, send, post or publish PET proprietary information outside of any of our systems or devices without prior authorisation.</li> <li>Use non-PET storage solutions, like external hard drives, USBs, personal Email, personal clouds or internet storage services, to store PET data.</li> <li>Copy or transfer files that violates Copyright laws.</li> <li>Disable security measures on PET technology systems or devices.</li> </ul>

#### [Our expectations of others who work with us](#)

If you have access to our equipment while working with us we expect that you fully comply with this section, including protecting PET's cybersecurity.

## 6.13 Communicating externally

As a publicly listed company, we are required to disclose information in a timely, accurate, consistent, complete and fair manner so investors can make informed decisions.

To make sure we provide timely and accurate information to investors, our public disclosures are carefully managed and must only be made by authorised spokespersons. Any public communication that can be attributed to PET, or to one of our employees, may be seen as a public disclosure. All of the following are considered public disclosures:

- regulatory filings, such as annual reports, news releases, briefings on profit and business performance;
- interviews, speeches, presentations articles and reports;
- Company information on digital communications channels, like websites and social media.

When you communicate externally, you should always act in accordance with our Shareholder Communications and Disclosure Policies, our 3C values and our Code of Conduct.

If you are an authorised spokesperson responsible for market disclosure, you must immediately release, through the relevant exchanges, any information or major developments which could have a material effect on the share price, or where an investor is likely to use that information to make investment decisions.

If you have prepared external communication materials, you must have them approved by the CEO.

It's important you feel empowered to speak positively about PET when asked by relatives and friends. To be able to do so, it's important you understand the distinction between information about PET that should be shared, and material information which can only be communicated by authorised spokespeople.

### Communicating on Social Media

Social media is a big part of most of our lives. PET views social media activity in the same way we view any kind of interaction: through the lens of our values and our Code of Conduct.

Your activity on social media can reach more people than ever before. While using social media may feel casual and spontaneous, activity is permanently retained and can be traced back to you. We want you to be able to make good decisions and avoid activity that could result in negative consequences for you, such as criticism by external parties, personal information theft or disciplinary action by the Company.

If you are active on social media, please use your common sense and judgment and consider the following:

- Is my activity in line with our 3C values and this Code?
- Can the Quick Test help me decide what to do next?
- Is my activity appropriate, given my role? If your role or your interactions with external parties mean you could be perceived as a PET spokesperson, it's best to state the views are your own when commenting about PET, our industry or topics of relevance to us.
- Are my comments accurate and not misleading?
- Is the information sensitive or confidential? Could I be putting PET or myself at risk if this information became public? Would I be comfortable if the media republished this information?
- Am I comfortable that my social media activity could be viewed by many people around the world, traced back to me and permanently retained?
- Do I have a right to use the information, including the text, images, footage or any logos, or do I need permission? Consider individual rights to personal information and privacy, confidentiality obligations, approval rights and intellectual property rights such as copyright.
- Is social media the appropriate forum or should I speak with my line leader or 2Up leader?
- Could my social media activities be used as part of identity theft? For example, someone may be able to reset your online passwords by gathering answers to your security questions, such as 'What is your favourite movie?' and 'What school did you go to?'

If you think you possess, or have released, material information that has not been disclosed to the public, you must immediately report it to the CFO or the CEO.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>Follow the rules relating to who can make public statements on behalf of PET. (See this Code and the Shareholder Communications Policy and the Disclosure Policy)</li> <li>Ensure all public communication is complete, fair, accurate, timely and clear.</li> <li>Obtain all relevant approvals prior to publicly releasing material.</li> <li>Report media and investment inquiries promptly to the CEO or CFO.</li> <li>Advise your line leader and Regional General Manager if you are attending an informal external event, such as a trade meeting or professional networking event.</li> <li>Get approval from the CEO to present an external speech or participate in an external panel discussion.</li> <li>Send a copy of your speech or presentation to the CEO for review and feedback.</li> </ul>	<ul style="list-style-type: none"> <li>Disclose information to the public unless you are specifically authorised to do so.</li> <li>Divulge confidential information unless you are an authorised spokesperson. If you are unsure about the degree of confidentiality assigned to information, talk with the CFO and Company Secretary.</li> <li>Say anything that may disclose confidential information or cause harm to our reputation.</li> <li>Conceal facts or omit information that may be relevant to a disclosure.</li> </ul>

#### Our expectations of others who work with us

This section applies equally to those who work with us. If you have any questions or need further information please speak to your primary contact.

### 6.14 Insider trading

We must never jeopardise the trust of communities, customers, suppliers or coworkers by using confidential information for financial or personal benefit.

Inside information is material information about a company that is not generally available to the public. Whether information is material is generally judged by whether it would affect a reasonable investor's decision making. Examples of possible inside information include:

- the financial performance of PET against market expectations;
- entry into or termination of a significant contract;
- actual or proposed mergers, acquisitions or joint ventures.

In the course of your job you may learn confidential information before it is made public, and it's not an offence to possess inside information. But in many countries it is a criminal offence to buy, sell or otherwise deal in relevant securities while you have inside information. This is called insider trading.

It is also a criminal offence to encourage insider dealing or to disclose inside information with a view to others profiting from it.

If you possess inside information, you should not advise or encourage another person (for example, a relative, a friend or family company or trust) to buy, sell or otherwise deal in the relevant securities or pass the information to another person. It may also be a breach of your obligations of confidentiality to disclose information, whether or not the information is used to deal in the relevant company's securities. If you have been identified as a designated person as per the Share Trading Policy you need to gain approval from a Notification Officer before engaging in any transactions involving PET securities. (refer to the Share Trading Policy).

If you have been placed on an Insider List, then you must not deal, or encourage others to deal in PET securities.

If you are an employee participating in any employee share scheme, you must not buy, sell or otherwise deal in PET securities during any close period, regardless of whether you hold inside information. Where PET has a business relationship with another company, you should be careful if you trade in that company's shares, as the same insider dealing rules apply to all shares. These types of investments may also give rise to an actual or perceived conflict of interest.

Where PET has a business relationship with another company, you should be careful if you trade in that company's shares, as the same insider dealing rules apply to all shares. These types of investments may also give rise to an actual or perceived conflict of interest.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Maintain the confidentiality of PET information.</li> <li>• Ask yourself if the market was aware of all the current circumstances, could the proposed dealing be perceived as taking advantage of your position in an inappropriate way?</li> <li>• Seek advice from the CFO and Company Secretary if you are considering dealing in securities and have any doubt.</li> <li>• Carefully consider the information you disclose about what you are working on, where you are going on PET business, who visited the office or site or what you talk about with other PET employees.</li> <li>• Take measures to avoid accidentally sharing inside information. This could involve not talking about confidential information in the elevator and not leaving confidential information on a copy machine.</li> </ul>	<ul style="list-style-type: none"> <li>• Buy or sell the securities of PET (or any other company) either directly, through relatives, other persons or entities while you are aware of inside information.</li> <li>• Disclose inside information to anyone outside PET unless it is appropriately authorised, documented and is necessary for the Company's business activities.</li> <li>• Recommend or suggest that anyone else buy, sell or deal in the securities of any company, including PET, while you have inside information about the Company.</li> <li>• Spread false information or engage in other activities to manipulate the price of publicly listed securities.</li> <li>• Trade in the shares of other companies when you have access to inside information that, if made public, could affect that company's share price.</li> </ul>

## 6.15 Personal information and privacy

PET respects your personal information and privacy, and expect you to respect the personal information and privacy of others.

Personal information is any information which could identify an individual, either from that information alone or in combination with other information which is reasonably likely to come into the possession of PET. To the extent permitted by law, we reserve the right to monitor or audit employee use of PET information systems, and access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet a legal or policy requirement.

It's important you follow our standards and procedures on personal information and privacy. Refer to PET's Privacy Policy and local legal requirements.

You should only collect, use, disclose, retain or process personal information that is necessary to meet business requirements, as permitted by law in places where we operate.

If you do not want others to read an email, you should reconsider sending it. If an email relates to a personal matter you should use a personal account.

Always treat the personal information and privacy of others with respect.

✓ Always	✗ Never
<ul style="list-style-type: none"> <li>• Collect personal information directly from the individual where reasonable and practical.</li> <li>• Comply with legal requirements that apply to the collection, use, disclosure, retention and processing of personal information.</li> <li>• Only collect, use, disclose, retain and process personal information that is necessary for legitimate business activities and functions.</li> <li>• Use personal information in a way that is consistent and compatible with the purpose</li> </ul>	<ul style="list-style-type: none"> <li>• Access personal information unless you have appropriate authorisation and a clear business need.</li> <li>• Provide personal employee information to anyone inside or outside of PET without proper authorisation.</li> <li>• Conduct reference or security checks without proper authorisation or the consent of the individual.</li> <li>• Retain personal information for longer than legally required or necessary to meet the business reason for which it was collected.</li> </ul>

<p>for which it was collected, unless otherwise approved by the relevant individual.</p> <ul style="list-style-type: none"> <li>• Use safeguards to help protect personal information against loss, destruction, unauthorised access, or the use, modification or disclosure of personal information.</li> <li>• Maintain the accuracy of your personal information.</li> <li>• Check the legal requirements about personal information applicable to your region.</li> </ul>	<ul style="list-style-type: none"> <li>• Move personal information between various PET legal entities or outside the country of origin without checking on the correct process. Speak to the CFO and Company Secretary if you are unsure.</li> </ul>
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#### Our expectations of others who work with us

If you work with us, you must uphold our standards and respect the personal information and privacy of our employees while you are working with us.

## 7 Breach of this Code

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Breaches of the Code of Conduct compromise our 3C values. If you breach the standards described in the PET Code you will face disciplinary action which may include:

- verbal counselling with your line leader;
- verbal warnings;
- written warnings or final written warnings; and
- termination of employment/ engagement/ contract.

In some cases, conduct that breaches of our Code of Conduct may also constitute a breach of law and carry civil penalties or criminal charges for you and PET.

## 8 Further information

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This Code can't describe or anticipate every situation, so to get help talk with your line leader or the Speak Up Line. The PET Leadership Team has an open-door approach, you are also welcome to talk with any member of the team for more information or clarity.

Further questions about the administration of the code and ideas to improve it should be directed to the CFO and the Company Secretary.

## 9 Review of this Code

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The Board will review this code from time to time. This code may be amended by resolution of the Board.