# Business Code of Conduct

Revision C



# **Policy Statement**

The Principals of Oil Gas Power International (OGP) have adopted and are committed to the following Business Code of Conduct which is applicable to all its officers, employees and representatives with respect to all of their transactions, whether local or international.

#### Local and Foreign Laws

OGP shall not, directly or indirectly, break or seek to evade the laws or regulations of any country in, through or with which it seeks to do business. That an illegal act is a 'customary business practice' in any country is not sufficient justification for violation of this provision.

# Bribery and Kickbacks

OGP shall not, directly, or indirectly, offer or provide a bribe or kick-back, and all demands for those must be expressly rejected.

Bribery and kick-back include any offer, promise, or gift of any pecuniary or other advantage, through any vehicle, whether directly or indirectly, to any individual or entity, within either the public or private sector, in order to obtain or retain business or other business advantage.

OGP shall have discretion to deviate from this prohibition if a company employee believes that human life or health is at risk. The circumstances of such payment must be immediately reported to management and properly recorded.

OGP recognises that extorsion is widespread in some regions of the world and that participation by the business community increases demand for facilitating payments.

# **Human Exploitation**

OGP rejects human exploitation practices and stands for respect to human rights in everything we do, and we expect that our suppliers and sub-contractors fully observe human rights.

Human exploitation in the context of business is complex and refers to enslavement of vulnerable people whose freedom is impacted by, amongst other vehicles, actions such as threats, abuse of power, deception, violence, and coercion.

A key part of supporting ethical standards is enabling our people and those of our suppliers and associates to feel safe and supported to report when they perceive reasonable grounds to suspect a human exploitation practice.

Practices that constitute human exploitation include:

- Slavery or servitude.
- Forced labour including child labour.
- Human trafficking.
- Debt bondage.
- Forced marriage.

The hidden nature of modern human exploitation means it can be difficult to identify. However, common indicators include:

- Unlawful withholding of wages.
- Withholding identity documents.
- Excessive work hours.
- Deduction of abusive fees.
- Inflated forced loans.
- Deceptive recruiting for labour or services.

#### Conflict of Interests

OGP shall avoid any relationship or activity that might impair, or appear to impair, his or her ability to render objective and appropriate business decisions in the performance of his or her job.

# Gifts Hospitality and Entertainment

OGP shall avoid the offer or receipt of gifts, meals, hospitality, entertainment, or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.

# Reporting Requirements

OGP encourages and expects that officers, employees, and representatives of OGP who find themselves subjected to any form of extortion or who become aware of or are asked to participate in any activity that contravenes this Code of Conduct promptly report these occurrences to senior corporate management, without fear that their employment will be adversely affected.

# Company Response

No employee will suffer demotion, penalty, or other adverse consequences for complying with this Code of Conduct even when OGP may lose business as a result. Employees are encouraged to report alleged violations of this Code of Conduct to senior management.

OGP will, where appropriate, sanction employees, suppliers or business partners for violations of this Code of Conduct.

# People and Environment

OGP recognises its moral and legal responsibility to provide a safe and healthy work environment for employees, customers, suppliers, visitors and associates at all OGP workplaces. This commitment extends to ensuring that our operations do not expose the local community to any risk of injury, illness or damage to property or environment.

Gary <u>Dagres.</u>

Janik Soysa.

Directors OGP Group Pty Ltd February 2022

Oil Gas Power International is a provider of a wide range of services, technologies and products to the infrastructure and engineering industries. Our activities include design, supply, procurement, installation, commissioning and maintenance.