

# Bioenergy Infrastructure Group

## Code of Conduct

It is Bioenergy Infrastructure Limited (BIG's) policy to conduct its business in accordance with the highest ethical, moral and legal standards.

This Code of Conduct applies to BIG as an entity and all individuals working for or on behalf of BIG at all levels and grades, whether permanent, fixed-term or temporary, and wherever located, including consultants, contractors, seconded staff, casual staff, agency staff, agents, sponsors and any other person who performs services for or on behalf BIG, (collectively referred to as "Staff") in this Code of Conduct.

In the event of doubt whether certain actions or behaviours might be in conflict with the principles set out in this Code of Conduct, please either contact BIG's Legal Counsel for advice and guidance, or; alternatively, please refer to BIG's Whistle Blowing Policy for details on how to report any behaviour which is in contravention to this Code of Conduct in a confidential manner.

### **Acting in conformity with the law and high ethical standards**

BIG as a company shall and requires that all Staff shall observe and comply with all laws applicable to BIG's business and to conduct all business affairs in an ethical and moral manner. BIG will not tolerate the infringement of any statutory laws setting out these principles, or these principles in general.

BIG upholds and promotes equality, diversity and inclusion. BIG's guiding principle is to respect the individuality and diversity of others and does not discriminate or condone discrimination, and it expects all Staff to do the same.

BIG requires all Staff to communicate respectfully with others in an open, accurate, effective and straightforward manner, consulting with colleagues as appropriate. BIG requires all Staff to work in collaboration with their colleagues and counterparties, recognising and respecting their roles and expertise and to work in partnership with them to ensure a high level of professionalism is always maintained. All Staff must behave and present themselves in a way that does not call into question their suitability to work for BIG. All Staff must also honour their work commitments, agreements and arrangements and be respectful of others, and trustworthy.

### **Fair Competition**

BIG believes in fair, lawful and open competition. BIG will not enter into, nor will it permit or tolerate any Staff entering into any agreement or arrangement, (either formal and informal), with any third party, including its competitors, which could directly or indirectly result in price fixing or the fixing of any other terms or affecting pricing or market policies and practices or otherwise result in conduct that violates antitrust laws.

## **Integrity**

BIG does not permit the giving or receiving of illegal, improper, or corrupt gifts be it cash, property or services, in order to retain business or any other advantages. Even the promise to make or receive such gifts is strictly forbidden, such gifts are deemed as bribery and a contravention of the Bribery Act 2010. Staff are referred BIG's Gifts and Corporate Hospitality Policy for specific details of what is and is not acceptable in relation to the giving and receiving of gifts and entertainment during the normal course of conducting business for and on behalf of BIG.

## **Prevention of the Conflict of Interest**

BIG requires that all Staff avoid any conflict of interests. If a member of Staff finds themselves in a position where their personal and business interests potentially come into conflict, they are required to declare this and obtain approval and register these potential conflicts of interests.

## **Health and Safety**

BIG is committed to providing adequate control of the health and safety risks arising from and associated with its activities; and seeks to prevent accidents and cases of work-related ill health; and to maintain safe and healthy working conditions. BIG requires its Staff, to do the same, and expects these same high standards on its contractors, suppliers, joint venture partners and other business partners.

## **Modern Slavery**

BIG has a zero tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring both in its business and supply chain, and imposes the same high standards on its contractors, suppliers, joint venture partners and other business partners, and BIG will ask suppliers, contractors and business partners that it does business with to confirm their compliance with the Modern Slavery Act 2015.

## **Environment**

BIG is committed to meeting all environmental legislation that relates to the company. In addition to this, BIG is committed to protecting the environment, and seeks to minimise its use of finite resources (such as energy, water and raw materials) and to minimise waste by evaluating its operations and ensuring they are as efficient as possible. BIG actively promotes recycling both internally and amongst its contractors, suppliers, joint venture partners and other business partners.

***Hamish McPherson CEO***