



AJ LUCAS GROUP LIMITED

CODE OF CONDUCT

Purpose

To provide all employees with simple guidelines on what behaviour is expected of them and what behaviour is considered unacceptable.

Scope

The principles apply to all employees and consulting or contracting personnel supplying a service to Lucas.

Principles

Failure to comply with principles of the LUCAS CODE OF CONDUCT will be investigated and may result in disciplinary action, dismissal, being reported to the Board and / or referral to the relevant authorities as considered appropriate.

A contractor or consulting service may be terminated immediately for non compliance.

General community and common law standards of behaviour and the Groups values as listed on the website will apply, in conjunction with the following indicative examples:

EXAMPLES OF ACCEPTABLE BEHAVIOUR:

- Carry out work in a safe, conscientious and effective manner to an acceptable standard;
- Comply with all relevant Company & site policies, procedures and relevant statutory regulations;
- Treat fellow employees, customers, suppliers and other contactors in a cooperative, fair, dignified and open manner;
- Comply with all lawful and safe instructions from your immediate manager/supervisor and other personnel associated with a contract or project;
- Report any incident or near miss you observe or are involved in;
- Present to work punctually and dressed as per appropriate site specific requirements; and
- Be courteous to members of the public and promptly respond to any complaints.

EXAMPLES OF UNACCEPTABLE BEHAVIOUR:

- Violence, harassment or abuse in any form whatsoever shown towards fellow employees, clients or anyone else related to work with the Company;
- Acts of incitement or actual acts of discrimination or harassment on the grounds of sex, marital status, disability, age, religious or political beliefs, race or national or ethnic origin;
- Damage caused by an employee to Company property found to be the result of gross negligence or intentionally caused by the employee;
- Breach of privacy of personal information held by AJL regarding its clients, customers, employees and others;
- Disregard for Company policy, rules or the welfare of fellow workers or customers;

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- Distribution of company records or data or disclosing confidential company information in an unapproved manner;
- Unauthorised operation of Lucas social media accounts and/or unauthorised representation of Lucas drilling responding to media statements, official announcements or social media platforms;
- Any activity bringing disrepute to the Company or its other employees;
- Unlawful behaviour which causes detriment to the Company;
- Theft;
- Wilful disobedience or misconduct;
- Refusal or neglect of duty;
- Insubordination;
- Concealment of material fact on engagement;
- Obscenity;
- Sexual Harassment;
- Conviction for an offence which renders the employee completely unable to work;
- Falsifying information in any personal record, including time or wages records, or the lodgement of a false Workers Compensation claim;
- Possession, use, or dealing in any prohibited drug or other restricted or dangerous substance during working hours or on Company premises;
- Disclosure to other persons of information relating to Company security arrangements;
- Duplication of company keys without permission from a Company Director or Manager;
- Client refusal to allow employee to return to site and/or to continue working on the Project; and
- Discredit or disparage Lucas or any of its companies, operations or personnel.

In addition to the above each individual is expected to avoid placing themselves in a position where their private interests conflict directly or indirectly with their obligations to AJL.

In the event an employee is witness to improper conduct included but not limited to those outlined in the Examples of Unacceptable Behaviour above, the employee can report a complaint to either the HR Team and/or Senior Management. This employee will be protected and any information presented will be treated confidentially (Whistleblowing).

This document is subject to periodic review and change. Every effort will be made to inform employees of any amendments to the Code of Conduct; however it is the employees' responsibility to keep up to date with any updates or additions to the Code of Conduct.

All employees, contractors and visitors are responsible for compliance with this policy within their area of operation.

Appendix A

What is a Conflicts of interest?

A conflict of interest can arise where there is a personal, family or associated commercial interest which may interfere, or appear to interfere with the interests of AJL as a whole and influence the individual in the effective and objective performance of their duties and responsibilities because of divided loyalties

Examples of conflicts of interest:

- being involved in, having significant ownership of, or personal financial interest in, other enterprises where a conflict may arise with the member of staff's obligations to AJL;
- participating in activities or discussions where there may be a conflict with their duties and responsibilities to AJL;
- soliciting or receiving benefits such as cash or gifts (including hospitality or entertainment) in connection with, or as a reward for, any service or business of AJL, where the benefits, because of the frequency of the offers, the cost and circumstances and timing in which they are offered, creates, or could be interpreted as creating, an obligation that affects the individual's objectivity in making a business decision;
- taking advantage of property, information or other opportunities arising from your position in AJL;
- conflicts of interest arising from a family, business or personal relationship; or
- conflicts arising from activities outside employment (such as involvement in community activities and professional organisations).

Any conflict of interest or potential conflict of interest should be reported to the individual's manager who must further report the conflict of interest in accordance with the Groups Delegations of Authority.