



Arq Group Code of Conduct

Our Code. Our Way.

The Arq Group Code of Conduct outlines our **'ways'** of working. We go beyond simply meeting our legal obligations. We aim to meet the highest standard of ethical conduct.

Our Code of Conduct sets out the behaviours we expect from you – and will guide you in your day to day work. For further support, our policies provide more specific information on processes and procedures.

What we expect

All of our people are expected to follow our code. This includes permanent and temporary employees, contractors, and directors. Everyone will need to take responsibility for their own conduct. Respect for the law, our Policies, and ethical behaviour is core to our ways of working. Our expectations are that you will:

- Comply with the law and direction from regulatory authorities
- Respect and maintain confidentiality of information belonging to customers, colleagues and others
- Report unethical or illegal behaviour

Our Ways of Working

We own it

We're Smarter together

We Work with heart

We Change it up

Our 'Ways' are more than just our corporate values, or aspirational company attributes. They are the way we work, every day and are key to a great culture, working environment and business performance.

Our Ways apply to all our people and our leaders are expected to role model our ways.





We own it

We support each other to deliver, without fail. Because when we succeed, so do our customers. It's as simple (and complex) as that. Whatever the challenge, we're ready to face it and deliver solutions that fit. We know what's expected of us and we do our work well, without excuses but with each other. We just nail it.

We Change it up

If there's a way to improve, we'll find it. If there's a new approach, we'll take it. That's because curiosity and creativity comes as standard at Arq Group. We're a unique business, one that loves change and asks brave questions. We might not know the answers, but in finding them we solve tomorrow's problems. Sometimes we work in spaces that don't yet exist –it's exciting!

We're Smarter together

Working together takes work, but we love it. Individually, we create incredible solutions. But it's when we collaborate that the really great ideas come to life. When we move at speed and we do it together, our customers win. We don't have meaningless meetings; we seek out new ideas and have open conversations. And because we trust each other, we're not afraid to share our thoughts or ask for help.

We Work with heart

Arq Group is an awesome place to do great work because we are a people business. We bring technology and people together in a human way. Together, we're honest, open and authentic. We lend a hand, support each other, laugh and have fun. We're all playing on the same team here, and it shows.

Our Ways in Practice

Our people are supported and included. We have fun but our workplace is safe and secure. We bring our best selves to work - we don't turn up under the influence of drugs or alcohol (See Work Health Safety Policies).

We look out for each other. We're diverse and inclusive. We ensure our people feel and are cared for. We don't abuse the complaints procedure to air grievances. And we understand there is no place for malicious or unfounded complaints. (See Bullying and Harassment Policy).

We're smart. We're professional. We don't allow personal matters to conflict with our work. And we raise any potential conflicts quickly and promptly. Even if it is to just to be safe. (See Conflict of Interest Policy).





We Take Our Ways Seriously.

If you have a question or concern, please speak up. You should not ignore any breach of the Code or any other Policy, actual or potential. Illegal, fraudulent or corrupt activity must always be reported.

Anyway raising a genuine concern will not to be exposed to reprisal, future career bias, or any form of retaliation.

If you believe you have been retaliated against for reporting a Code or Policy breach, you should also raise this through the same channels.

How to raise a concern?

- Raise the matter with your line manager and/or the People & Culture team. Or;
- If you believe this matter requires a higher escalation, you can report the issue to the General Manager Legal or to our Company Secretary. Or;
- The next escalation can be to one of the Executives or our CEO; Or
- The whistleblower hotline is available on 03 8624 2318 or whistleblower.hotline@arq.group. Reports to the Whistleblower hotline are accessible only by Group Risk & Audit team, Company Secretary & CEO and can be made anonymously. Or;
- If this matter is of such a sensitive nature or concerns an Executive, you can report it to the Chair of our Board.

How do we handle complaints?

Reports are treated seriously and in confidence and will be investigated. They will only be shared with others on a “need-to-know” basis. This may happen if we have to interview people involved in the investigation. If you have raised a complaint, your name will not be mentioned without your consent. We will give you regular feedback and tell you the outcome of the investigation.

Our Risk & Audit Manager will report whistleblower incidents every 6 months to a Board sub-committee – The Audit and Risk Committee (ARMC). Serious reports may be referred immediately to the Chair of the ARMC.

Can a report be made anonymously?

Yes, we will maintain anonymity as much as is reasonable. It may make the investigation more difficult. If the investigation involves legal proceedings, then we may need to disclose your identity.





What happens if there is a breach?

Failure to follow the Code is a very serious matter and may result in disciplinary action. In some cases, it could lead to termination of employment. In the case of contractors or consultants, failure to follow the Code could result in termination of their relationship with the Arq Group. If a breach involves criminal offences, we will refer it to the appropriate authorities or the police.

Who manages the Code of Conduct?

It is owned and managed by the People & Culture and Legal teams. You can contact them on people@arq.group or legal@arq.group.

We may update the Code from time to time. If we do so, we will give notice of the change.

More Information?

If you want to more about our Code or our Ways, we would love to hear from you. You can speak with a member of the Executive Team, or People and Culture team (email people@arq.group)

