



Code of Conduct

Powering better journeys, today and tomorrow





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“Each of us has a part to play in upholding Ampol’s reputation to ensure our ongoing success.”

Matt Halliday
Managing Director & CEO



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A message from the CEO

The culture of our organisation and how we work together to achieve our vision is critical to our success.

I am proud to work as part of a global team that not only lives our values every day, but also sets and upholds high standards of conduct, ethics and integrity. These standards guide our actions, decisions and behaviours, and contribute to the reputation our Ampol brands have in the marketplace, with our customers, shareholders and the communities in which we operate.

Built on the foundation of our values, this Code of Conduct brings together all these standards into a single, straightforward guide for our daily work. It sets out expectations about how we conduct our business - with each other,

our customers, suppliers, contractors, external stakeholders such as the media, shareholders, government, and our other partners.

I ask that you read it, understand it and seek further information whenever you need it.

In addition, I ask that you hold each other accountable on a daily basis to the standards set in our Code of Conduct.

Each of us has a part to play in upholding Ampol's reputation to ensure our ongoing success, and I look forward to your continued support.

Matt Halliday
Managing Director & CEO
Ampol Limited

Ampol Values

Our values underpin everything we do



**Move
as one**

We operate as one enterprise, manage trade-offs, safety is always top of mind.

Build trust and care; Leverage strengths; Break down silos



**Make
it happen**

We have bold goals that raise the bar and deliver on what matters.

Own the outcome; Adapt quickly; Take smart risks



**Make
it count**

We understand what matters most and adapt what we do to create value that lasts.

Put customers first; Break new ground; Make an impact

Our Code

Our Code

The Ampol Code of Conduct sets out the standards of conduct and behaviours we expect from you as an employee of Ampol, wherever you work. It has been developed to help you, and the people you work with, to uphold our values.

This Code is designed to help you make the right choices when you are working for or representing Ampol, whether you are in the field, on any of our sites, speaking with our customers and suppliers, or working with each other.

It also provides you with information about Ampol policies, expectations of all our people, and our legal obligations to ensure we conduct our business within a framework of decision making and business behaviour that builds and sustains our corporate integrity, reputation and success. The Code will be periodically reviewed to check that it is operating effectively and to determine whether any changes are required.

Each of us is responsible for our own behaviour and we are all accountable for the choices we make. Compliance with the Code is treated very seriously by Ampol.

Our expectations of you

All employees, including senior executives, directors and contractors of Ampol Limited and its wholly owned subsidiaries, as well as those in our operated joint ventures ("Ampol"), must adhere to this Code, regardless of the country in which they work.

Please take the time to read and understand the Code and its supporting policies and apply them in your work every day.

You are expected to:

- Have a clear understanding of how the Code and policies apply to your work and behaviours.
- Seek assistance if you have any questions or concerns about the Code, any policy or practice, or what is expected of you.
- Act ethically and with integrity, in a manner that is consistent with our values, standards, policies and delegations of authority.
- Comply with all applicable laws, regulations and Ampol policies and procedures.
- Be respectful of diversity and work towards an inclusive environment.
- Promptly raise known or suspected breaches of the Code.
- Be honest, candid and cooperate fully in any investigations that Ampol undertakes.
- Ensure that, if involved in an investigation, confidentiality is maintained.

Our Code

Our expectations of you
How to raise a concern
Does it pass the Ampol test?
Supporting those who raise concerns

Ampol people leaders are expected to:

- Consistently demonstrate, role model and guide their teams to act and operate in accordance with this Code and our values.
- Be visible and approachable, make decisions based on merit only, foster open and candid dialogue with their teams, as well as value people as individuals and build connections with and between others.
- Champion the overall wellbeing of the company by using and encouraging 'whole of organisation' thinking and collaboration.

If you are unsure which laws and regulations apply to your role, what is expected of you, or if compliance with the Code contravenes the laws of the country in which you are working, please contact your manager, the Legal department or your People & Culture representative.

Reportable conduct under the Code includes, but is not limited to:

- breaches of regulations, laws or obligations under a contract
- breaches of Ampol policies, processes or standards
- illegal, fraudulent, dishonest, corrupt or unethical activity
- endangering the health or safety of any person
- inappropriate workplace behaviour (e.g. discrimination, harassment and bullying)

How to raise a concern

You have a responsibility to abide by the Code and to ensure that your colleagues and partners in business also adhere to our Values. If you witness, or suspect, a breach of the Code, you are required to report this conduct to your manager or People & Culture.

If you would prefer to make an anonymous report, you can contact the Hotline, details of which may be found at the bottom of this page. The Hotline is available to make confidential or anonymous reports to an independent third-party provider.

All complaints and reports are treated seriously and Ampol will conduct, where appropriate, a confidential and objective investigation. Whether or not an investigation is required and the type of investigation process to be used will vary, depending on the nature of the reportable conduct.

You are required to comply with this Code and any policies, procedures and standards that Ampol may implement, as varied by Ampol from time to time at its discretion. To the extent that the contents of this Code, policies or procedures refer to obligations on Ampol, they are guides only and are not contractual terms, conditions or representations on which you are entitled to rely.

Failure to comply with laws and regulations set out in this Code may lead to criminal sanctions or other serious consequences for you and for Ampol.

Ampol employees and contractors who breach any aspect of the Code or Ampol policies may be subject to disciplinary action, up to and including termination of employment or, in other cases, termination of engagement.

Remember – Always report a suspected or actual breach of the Code.

**The Hotline**

The Hotline is available 24 hours a day, seven days a week.

It is an independent service operated by specialists who can help you report a concern.

To contact the Hotline:

In Australia, Singapore, the US

+ 61 1800 200 317 (see Ampol Hotline website for Singapore and USA Numbers);
ampolhotline@deloitte.com.au; or
www.ampolhotline.deloitte.com.au

In New Zealand

0800 403 478
dwsnz@deloittedigital.com; or
The Whistleblower Service PO Box 912028
Victoria Street West Auckland 1142

Does it pass the Ampol test?

Before you raise a concern, ask yourself some simple questions.

1. Does the action or conduct fit with our values or this Code?
2. Would you feel comfortable if the action or conduct became public and was shared on social media?



**Move
as one**



**Make
it happen**



**Make
it count**

Supporting those who raise concerns

If you are aware of someone who has raised concerns (or suspect someone has), you must not:

- mistreat or victimise (or threaten to mistreat or victimise) that person for raising the concerns;
- in certain circumstances (i.e. whistleblowing complaints), disclose the identity of that person or information likely to lead to their identification, without their consent.

**For more information**

- Whistleblower Policy
- Whistleblower Quick Guide

Contact

- The Hotline
- Your manager
- People & Culture
- Legal department



Our People

Health and safety

Fitness for work

Representation, Equity & Inclusion

Inappropriate workplace behaviour

Our People

Health and safety

At Ampol, we are committed to providing a psychologically and physically safe and healthy workplace for all employees and contractors. We strive to operate in a way that will not adversely affect the health and safety of our neighbours, customers, visitors or the public.

We are committed to the goal of everyone going home safe and healthy every day. To achieve this commitment, we integrate health and safety into our business strategy and planning processes. We also maintain systems to identify and manage health and safety risks, including psychosocial risks, and measure and monitor our performance to ensure continuous improvement.

Our health and safety performance measures and audit systems monitor improvement and progress towards our commitment to providing a safe and healthy workplace for all Ampol employees and contractors.

All employees, contractors and visitors to our sites are required to meet their health and safety responsibilities and comply with our health and safety management systems, procedures and guidelines.

We are all responsible for ensuring that we work safely, do not endanger ourselves or anyone else, either physically or psychologically, and that our workplaces are safe.

Always:

- Comply with health and safety and other workplace legislation, and with Ampol's health and safety management systems.
- Use all required safety equipment and protective clothing, and make sure it is in good condition.
- Follow all work procedures, guidelines or instructions that apply to your job at Ampol.
- Report any unsafe conditions, equipment or work practices.
- Ensure that all safety incidents, injuries, illnesses and near misses are recorded accurately and in a timely manner before leaving the work location.
- Participate in consultative processes to improve and enhance safety.
- Know the emergency procedures that apply to your work location(s).

Never:

- Take shortcuts or ignore your job procedures or Ampol's safety management system requirements.
- Ignore hazards or situations that may pose a physical or psychological threat to your health and safety or to anyone else.
- Tamper with or disable alarms.
- Delay or omit to report and record an incident, injury, illness or near miss.



For more information

- Health, Safety and Wellbeing Policies
- OE Incident reporting, recording and investigation requirements

Contact

- Your manager
- Health and Safety representative
- Risk or Safety representative

Fitness for work

All our employees, contractors and others who work with us are required to be able to perform their work in a way that does not compromise or threaten the safety or health of themselves or others.

While at work or conducting business on behalf of Ampol, you must take responsibility for your individual fitness for work, and must not be impaired by fatigue, alcohol, illegal drugs, or legal drugs or substances which may impact your ability to safely perform your duties.

If you are unable to safely perform any aspect of your role, you must not undertake any work until you speak with your manager or supervisor (which you must do immediately) and it has been confirmed that you are able to work safely.

Drugs and alcohol

The use of drugs or alcohol can impair individual perception, judgement, and response leading to increased risk to the individual, the organisation, and the community. As such, our policy on drugs and alcohol has been established to eliminate or minimise these risks.

The Drug and Alcohol Policy applies to all workplace participants including employees; contractors; people performing work for, or on behalf of, Ampol; people providing services to, or on behalf of, Ampol and visitors while on premises that are owned, leased, or controlled by Ampol unless otherwise authorised.

Individuals must not:

- use or consume any substance that impacts their performance, judgement, or behaviour to the extent that there is a risk to their safety or the safety of others; nor
- return a "Positive" test result when tested for drugs or alcohol.

Our Employee Wellbeing and Assistance programmes are available to assist employees and their families with a range of personal and professional issues, including overcoming drug and alcohol related problems.

Always:

- Seek assistance if you are experiencing difficulties with drug or alcohol related issues.
- Report to work fit for duty and ready to safely carry out assigned work.
- Disclose any physical or psychological conditions (including the use of medications, drugs or other substances) which may impact your ability to work safely.
- Advise your manager immediately if you, or a co-worker, are unfit or become unfit during work.
- Comply with all applicable Drug and Alcohol policies and procedures.

Never:

- Possess, sell, distribute or take illegal drugs while on Ampol worksites or using vehicles, during working hours, at any event or activity organised by Ampol or in conjunction with the Ampol business, or otherwise when you are performing your duties.
- Be under the influence of any illegal drugs or alcohol while at work, performing your duties or otherwise representing Ampol.
- Be under the influence of legal drugs or other substances which adversely affect your ability to perform your duties safely while at work, or otherwise representing Ampol.
- Report to work unfit to perform the requirements of the job as a result of fatigue, drugs, alcohol or any other reason.



For more information

Australia, Singapore, US

- Ampol Drug and Alcohol Policy

New Zealand

- Z Energy Drug and Alcohol Policy

Contact

- Risk or Safety Representative
- Health and Safety representative
- People & Culture
- Employee Wellbeing & Assistance Programme

Representation, Equity and Inclusion

At Ampol, we believe that diverse representation is a strength, our people thrive when they can be themselves at work, and that inclusive leadership is everyone's business. These core beliefs underpin our focus on Representation, Equity and Inclusion (REI) and our commitment to providing a workplace in which our varied backgrounds, perspectives and experiences are encouraged so we can all contribute to our full potential without encountering prejudice or inappropriate workplace behaviour (e.g. discrimination, harassment or bullying).

By representation, we mean the varied characteristics represented within our personal and professional communities such as thinking styles, capabilities, education and background, gender, ethnicity, religion, age, sexual orientation, disability, family status and all the other differences that make each of us who we are.

You are expected to act in a manner which supports Ampol's Representation, Equity and Inclusion Policies at all times.

Any actions or behaviours which do not comply with our policies will not be tolerated. Decisions based on the personal characteristics of an individual (e.g. race, sex, age) may constitute unlawful discrimination and are prohibited.

Always:

- Make decisions on selection, promotion, development, remuneration and termination on the basis of merit and business considerations, and without regard to race, colour, religion, sex, sexual orientation, national origin, age, disability, health status, family responsibilities, gender identity or political affiliation. Treat others with respect and without bias based upon personal circumstances or attributes.
- Treat others with respect, fairness and dignity.
- Raise any concerns about inappropriate actions or behaviours that are not in line with our commitment to representation, equity and inclusion.

Never:

- Make decisions based on attributes unrelated to job capabilities, experience, skills, qualifications or performance.
- Engage in or tolerate unlawful discrimination, harassment or bullying of any type.
- Accept or ignore any behaviour in conflict with our Representation, Equity and Inclusion Policy.



For more information

Australia, Singapore, US

- Ampol Diversity and Inclusion Policy

New Zealand

- Z Energy Diversity Policy

Contact

- Your manager
- People & Culture
- Employee Wellbeing & Assistance Program

Human Rights

At Ampol we believe that everyone is entitled to certain basic standards of treatment, regardless of personal attributes such as gender, race, nationality, economic status or religion. We are committed to supporting the fundamental principles of human rights, as expressed in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

We do not tolerate any form of slavery or child labour, including forced labour. We work hard to ensure that slavery or child labour is not taking place in our operations or supply chains.

We acknowledge that in order to respect human rights, we need to know what adverse human rights impacts we are causing, contributing to or are linked to, and manage these appropriately.

Inappropriate workplace behaviour

At Ampol, we believe that everyone should treat each other with fairness and respect at all times. We aim to provide all employees, business partners and other stakeholders with a safe, supportive, inclusive and harmonious workplace.

You are expected to behave professionally at all times, and are accountable for your decisions, conduct, actions and behaviour. This includes when you are at work as well as working off-site, after hours, at work-related functions, travel and any conduct or behaviour outside of working hours where you are undertaking any activities relating to, or connected with, your employment at Ampol.

You must not bully, harass, sexually harass or discriminate against any other person, irrespective of whether that person is an Ampol employee, customer, supplier or a member of the public.

You also must not bully, harass or victimise any person who has raised concerns, reports or provides information about this type of conduct.

Always:

- Support and promote Ampol's commitment to positive workplace behaviour.
- Treat everyone with fairness and respect.
- Be aware that what you personally consider acceptable may not be acceptable to others.
- Encourage the reporting of inappropriate behaviour and speak up even if the behaviour is not directed at you.
- Openly participate in workplace investigations with integrity.
- Respect each other's privacy.

Never:

- Discriminate, harass, bully or victimise another employee or anyone else.
- Tolerate unacceptable or inappropriate behaviour at work, a work-related social function or by email, text or social media.
- Accept or ignore this type of behaviour when you witness it occurring to someone else.



For more information

Australia, Singapore, US

- Ampol Discrimination Harassment and Bullying Prevention Policy

New Zealand

- Z Energy Discrimination, Bullying and Harassment Policy

Contact

- Your manager
- People & Culture
- Hotline
- Employee Wellbeing & Assistance Program



Discrimination occurs when a person is treated less favourably than another person in the same or similar circumstances, due to a personal characteristic that is protected by applicable laws. Examples of personal characteristics are race, colour, religion, sex, sexual orientation, national origin, age, disability, health status, family responsibilities, gender identity or political affiliation.

It can also occur when an unreasonable requirement, condition or practice is imposed on a person who will find it difficult to comply due to their personal characteristics or circumstances.

Harassment is any uninvited, unwelcome or unreciprocated conduct or behaviour related to a personal characteristic, which could reasonably be expected to make a person feel intimidated, embarrassed, humiliated or offended. Harassment can be a single incident or repeated behaviours. It can also be physical, verbal or visual. It does not matter if this conduct is unintentional if the behaviour could reasonably be expected to harm or distress another person.

Bullying occurs in the workplace if, while a worker is at work, an individual (or group of individuals) repeatedly behaves unreasonably towards the worker, or a group of workers of which the worker is a member, and the behaviour creates a risk to psychological and/or physical health and safety.



How we do business

- Operational excellence
- Risk management
- Communities
- Working with governments & regulatory authorities
- Fair competition
- Business conduct

How we do business

Operational excellence

Ampol is committed to minimising adverse impacts on the environment and the communities in which we operate.

Ampol places the highest priority on the safety, health and security of our workforce, customers and neighbours, and protection of the environment. We are committed to understanding and managing our risks. We do this through our Operational Excellence Management System (OEMS) in Australia and internationally, except in New Zealand where we do this through our Z Organisational Risk Management System (ZORM).

Operational Excellence is the systematic management of safety, health, environment, reliability and efficiency to achieve world-class performance. The Ampol OEMS and ZORM each provide a framework for managing risk, safety, health, security, environment, product quality and reliability.

Always:

- Adhere to all Operational Excellence, Health, Safety and Environment policies and procedures.
- Follow these three basic principles:
 - Do it safely or not at all
 - There is always time to do it right
 - When in doubt, find out
- Consider potential impacts on the environment and be prepared for emergencies.
- Report any health, safety or environment breach or concern to your manager or the Risk and Regulatory team.

Never:

- Disable alarms without appropriate approval.
- Ignore any concern or breach of which you may be aware.
- Disregard the environmental impacts of your work.



For more information

Australia, Singapore, US

- Ampol Health and Safety Policy
- Ampol Environment Policy
- Ampol Quality Policy

New Zealand

- Z PCBU Policy
- Z Safety & Wellbeing Stand
ZORM Standards

Contact

- Your manager
- Health and Safety representative
- Risk or Safety representative

Risk management

At Ampol, we proactively and systematically manage risks to:

- protect the health and wellbeing of our people;
- understand and comply with our obligations to the community; and
- continue to protect shareholder value.

Risk identification, assessment and, where appropriate, mitigation, are core components of our strategic business planning processes, project development and execution processes, and the conduct of our day-to-day business operations.

We systematically identify legal, regulatory and contractual obligations and adopt an assurance system to ensure compliance with these and Ampol's policies and procedures.

We believe the integrity of our financial statements and other regulatory reports is critical to the successful operation of our business and to maintaining the confidence and trust of our shareholders, customers, employees, business partners and other stakeholders.

You are responsible for:

- Taking all reasonable and practicable steps to perform your responsibilities in accordance with Ampol's risk systems and procedures;
- Complying with all risk management policies, as well as all relevant laws and regulations;
- Communicating risks openly and honestly; and
- Monitoring and controlling risks within your sphere of influence.

Always:

- Ensure that all Risk Management Policies and related procedures are complied with at all times.
- Report any actual or suspected irregularities or weaknesses in relation to internal controls, accounting or reporting.
- Act within your delegation of authority, review and approval processes.

Never:

- Misrepresent the financial or operational performance or otherwise knowingly compromise Ampol's integrity.
- Influence or allow others to do anything that would compromise the integrity of Ampol's records or reports.
- Enter information in Ampol's systems or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction, result or balance.



For more information

Australia, Singapore, US

- Ampol Risk Management Policy

New Zealand

- Z Enterprise Risk Policy

Contact

- Your manager
- Health and Safety representative
- Risk or Safety team member
- People & Culture
- Hotline

Communities

Ampol is committed to giving back and being a positive contributor in the communities in which we operate. Our focus is in the areas where we can bring the most value, whether in youth and education, safety, or by helping underserved groups to have a remarkable impact in their community.

We also work closely with our surrounding neighbours to consult and communicate with them on operational matters to ensure they understand the nature and any impact changes may have. We are proud of our strong relationships with these communities and continue to develop our relationships with them.

Volunteering

Ampol enables employees to contribute directly to the work of our not-for-profit partners by providing regular team volunteering opportunities.

Corporate sponsorship

We partner with a variety of organisations who share our values and utilise our support to make a real difference in the community.

Ampol's social investment program does not provide support or funding for:

- political or religious activities;
- individuals (directly or for fundraising purposes);
- international not-for-profit organisations;
- hazardous, dangerous or gambling related activities;
- programs or initiatives that may be construed as racially prejudiced or discriminatory;
- salaries or administrative funding; or
- overseas travel.

Working with Governments & Regulatory Authorities

Ampol operates in a highly regulated environment across all aspects of our business in the countries in which we operate.

We aim to have a collaborative, cooperative and transparent relationship with all levels of government. To enable us to do this, Ampol has a dedicated Government Affairs team.

Requests for information

If you receive a communication or request for information from Australian or overseas-based government bodies and agencies, you must notify the Government Affairs team immediately.

Government Affairs must be made aware of any interaction you have with Government officials, either formal or informal, as part of your role.

Political contributions

Ampol does not make cash donations to political parties, politicians, elected officials, election committees or candidates for public office in any country, without prior approval from the Managing Director & CEO. Proposed political donations will not be approved unless they comply with relevant laws, regulations and regulatory obligations which apply to the Ampol business.

However, Government Affairs and relevant employees may attend certain political functions, including, but not limited to, the business engagement initiatives of political parties.

Contact

- Head of Government Affairs

Political activities

You may only participate in political activities in a personal capacity if the activities are not being undertaken in your role as an employee or representative of Ampol. Your personal political activities must be kept separate from your role, and not be perceived as representing Ampol.

Regulatory Authorities

During your time with Ampol, you may have to deal with officers of regulatory authorities in the course of exercising their powers. There are specific procedures that all Ampol officers, employees and subcontractors must follow when dealing with regulatory authorities and their officers.

It is vital that you follow these procedures to ensure that you and Ampol comply with the law in relation to assisting regulatory authorities in their investigations.

If you are in doubt or have any questions, you should seek advice from the Legal department. In the first instance, contact your usual legal representative. If your usual legal representative is not available, other members of the Legal department will assist. If after hours legal assistance is required urgently, please contact the Ampol Duty Manager.

Always:

- Report to the Government Affairs team all interactions with the political and bureaucratic arms of government outside of the day-to-day operations and meetings that Ampol would ordinarily engage in.
- Seek approval from Government Affairs prior to:
 - any engagement at the political or bureaucratic levels of government as it relates to policy proposals and submissions; or
 - attending or speaking at political events (e.g. conferences, policy forums, political events in an Ampol capacity, regardless of whether they are paid or complimentary).
- If you receive a notice from a Regulator which is potentially more serious, contact your Legal department immediately.

Never:

- Treat a visit from a regulatory authority in a hostile or confrontational way. Be firm, polite and respectful, follow the procedures and seek advice from the Ampol Duty Manager or Legal department immediately.
- Claim to represent, including in your personal capacity, to external parties the views or submissions of Ampol without prior approval of Government Affairs.



For more information

- Procedures for Responding to Regulatory Authorities

Australia

- Competition and Consumer Act Compliance Standard

Contact

- Government Affairs
- Ampol Duty Manager
- Legal department



For more information

- **Australia, Singapore, US**
 - Ampol Government Affairs

New Zealand

- Z Corporate Affairs

Fair competition

Ampol is committed to complying with competition and antitrust laws of Australia and with those of any other country which are applicable to Ampol's business. These laws promote competition and protect consumers by prohibiting various kinds of anti-competitive behaviour.

You must not engage in any conduct or activity that breaches, or could be perceived to breach, any competition, antitrust or consumer protection laws.

A breach (whether actual or perceived) of competition, antitrust or consumer protection laws in any state, territory, province or country can cause significant damage to Ampol's business and reputation.

To ensure our people understand their obligations, our Competition and Consumer Act Compliance Standard sets out our expectations and information about how to comply with these laws.

Always:

- Make pricing and marketing decisions independently.
- Consider the appearance and implications of interacting with a competitor, whether in a business or personal setting.
- Know who our competitors are – they include our independent resellers and retail franchisees.
- Compete genuinely in any tender processes.
- Make sure that any claim you make about our products is well-founded and (where appropriate) scientifically proven. In other words, there must be a reasonable basis for any such claim.
- Promptly report incidents where you suspect there may have been a breach of any competition, antitrust or consumer protection laws to your manager and the Legal department.
- Obtain approval from the Legal department before submitting any information to a competition regulator.

Never:

- Engage in any form of agreement or understanding with competitors to allocate customers, fix prices, rig bids or restrict supply.
- Act in an unfair manner. Large businesses are required to be mindful of the interests of small business suppliers/acquirers, and not take any unfair advantage.
- Discuss bid responses or any part of a bid response with a competitor.
- Agree with competitors not to deal with a particular buyer or supplier, and never threaten to boycott a supplier if it will not stop supplying a rival business.
- Discuss or attempt to influence the price at which a customer resupplies the goods supplied by Ampol.
- Try to eliminate or substantially damage a competitor, or deter a competitor from entering or competing in any market.
- Do or say anything in marketing, negotiating or selling that is misleading, deceptive, or falsely represents Ampol's products or our competitors' products.

Business Conduct

By upholding the highest ethical, transparent and responsible conduct in all our business dealings, we live our values and protect ourselves and Ampol from fines, penalties or, in extreme cases, criminal liability. We understand that complying with all applicable laws and regulations in the locations where we operate is an essential requirement for success.

Bribery, Corruption and Fraud

We never give or accept bribes. We have zero tolerance for corruption and fraud.

Bribery, corruption, and fraud are completely unacceptable at Ampol and contrary to our values. If you engage in such conduct, this will have serious consequences for Ampol and individuals, including the potential for substantial fines and imprisonment. Even the appearance of improper conduct can damage the reputation and standing of individuals and Ampol.

If you ever encounter a request for facilitation payments in order to speed up a licence, permit or even a visa application, you must turn it down and report it to the Legal department as soon as possible. Never authorise a third party to make such payments on behalf of Ampol.

Gifts, Benefits and Hospitality

We give appropriate gifts and offer reasonable hospitality.

It may be appropriate for you to exchange gifts, benefits and hospitality with external parties in some circumstances. However, you must always ensure that any gifts, benefits or hospitality are not given or accepted which could compromise the reputation of Ampol, breach the law, or the Ampol Anti-Bribery and Corruption, Gifts & Hospitality Standard.

Follow all policies or business guidelines regarding the offering and receipt of gifts, benefits or hospitality and ensure that all gifts, benefits or hospitality, received or given, are reasonable, legitimate, approved, and comply with the relevant policy.

Sanctions

We are committed to complying with our obligations under the countries we operate in and international sanctions law. Sanctions are often extra territorial, affect international trade and exist in many countries where Ampol and its subsidiaries do or seek to do business. As these laws change frequently and the application is complex, ever changing and fact specific, you should seek guidance from the Legal department.

Always:

- Report any instance of bribery, corruption or fraud to your Manager, the Legal department, People & Culture representative or the Hotline.
- Give and receive gifts, benefits and hospitality in accordance with the Group Anti-Bribery and Corruption, Gifts & Hospitality Standard.
- Seek advice if you encounter a sanctions issue.



For more information

- Competition and Consumer Act Compliance Standard

Contact

- Legal department
- Hotline

Conflicts of Interest

We must all avoid any situation where our personal interests could conflict with our obligation to act in the best interests of Ampol.

Seek approval from your manager before you:

- consent to being appointed as a director or committee member for any company or organisation that does not form a part of Ampol;
- commence any business dealings on behalf of Ampol with your family, friends or related parties; or
- accept employment with, or agree to provide any services to, any person, company or organisation that you deal with as part of your role with Ampol.

Personal relationships in the workplace may also raise ethical and professional issues. This includes conflicts of interest, when the relationship conflicts (or can be perceived to conflict) with professional responsibilities and the making of decisions in the workplace. It is expected that you will disclose to your manager any existing or previous personal relationship with current or prospective employees, or a person who has a business connection to Ampol.

Always:

- Conduct all business relationships in a professional and impartial manner.
- Report to your manager any actual or potential conflict of interest as soon as you become aware.
- Seek your manager's approval before accepting a directorship or officer position on the board of a non-Ampol company or organisation.

Never:

- Hire, promote or directly supervise a relative (or person with whom you have an intimate or personal relationship) without specific authorisation from the relevant Executive General Manager.
- Participate in business activities outside Ampol if the activities could adversely affect your ability to carry out your duties and responsibilities to Ampol.
- Serve as a director or officer of, or consultant to, any company or organisation that is a direct competitor of Ampol.



Bribery = offering, promising, giving, receiving or soliciting anything of value, directly or indirectly, in order to corruptly influence how someone carries out a public, commercial or legal duty.

Examples of bribes can include cash, lavish gifts, sponsorship, travel, accommodation, political donations to gain a specific business advantage, undisclosed agent's fees, inflating of tenders, and employment.

Corruption = dishonest conduct in which an individual abuses his/ her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.

Fraud = dishonestly obtaining a benefit by deception or other means. Examples include theft, misuse of company assets, falsification of documents such as invoices and timesheets, expense claims, unauthorised bank transfers and intentional misstatement of financial records.

Facilitation Payments = small payments, outside of normal fees, that may be requested by public officials to process routine clerical or administrative actions (such as issuing permits, licences or approvals). These are strictly prohibited and are considered in many jurisdictions to be bribes.

Sanctions = Sanctions are political and / or economic laws, regulations and / or measures (including licensing and reporting obligations) put in place by a Sanctions Authority as part of a broader diplomatic effort to change the behaviour of a country or regime. They are also known as: Trade controls, boycotts, embargoes, export controls and economic sanctions.

Sanctions Authority = Any governmental authority or supranational organisation of the United Nations, Australia, New Zealand, Singapore, the United States, the European Union, the United Kingdom, or any other jurisdiction applicable to Ampol's operations that may impose Sanctions.



For more information

- Ampol Conflict of Interest and Disclosures Standard
- Ampol Anti-Bribery and Corruption, Gifts & Hospitality Standard
- Ampol Sanctions Policy
- Travel and Expense Policies

Contact

- People & Culture
- Legal department
- Your Manager
- Hotline



How we communicate

Engaging with our shareholders and the financial community
Engaging with our stakeholders

How we communicate

Engaging with shareholders and the financial community

Ampol is committed to providing shareholders with clear and balanced information about our business and performance. Our Securities Holder Communication Policy sets out Ampol's approach to engaging with our shareholders and encourages participation at general meetings.

Investors and Analysts

The Board has authorised the following people, as Ampol Market Disclosure Officers, to represent Ampol and all members of Ampol in all communications with investors and analysts:

- the Ampol Chairman;
- the Ampol Managing Director & CEO;
- the Ampol Chief Financial Officer; and
- the Ampol GM, Investor Relations & Sustainability.

You are not authorised to communicate with investors or analysts on behalf of Ampol and all members of Ampol unless you have previously received written authorisation from the Ampol Chairman or you are an Ampol Market Disclosure Officer.

Continuous Disclosure

Ampol Limited is listed on the Australian Securities Exchange (ASX) and must comply with the continuous disclosure obligations outlined in the ASX Listing Rules, the Corporations Act 2001 (Cth) and the Financial

Markets Conduct Act 2013 (as applicable). We have a Continuous Disclosure Policy to ensure that we meet all of our obligations.

Ampol will immediately notify the ASX of any information (unless certain exceptions apply under the ASX Listing Rules) that a reasonable person would expect to have a material effect on the price or value of Ampol's securities.

The Board is ultimately responsible for Ampol's compliance with continuous disclosure obligations and has appointed the following Ampol Disclosure Officers, or their delegates, to assist it in meeting these obligations:

- the Ampol Managing Director & CEO;
- the Ampol Chief Financial Officer; and
- the Executive General Manager, Group General Counsel and Governance.

Ampol has also appointed the Ampol Company Secretary as the primary person responsible for communications with the ASX in relation to Listing Rule matters.

If you think you possess, or have released (inadvertently or selectively) information that a reasonable person would expect to have a material effect on the price or value of Ampol's securities (market sensitive information) you must immediately report it to an Ampol Disclosure Officer.



For more information

- Securities Holder Communication Policy
- Continuous Disclosure Policy

Contact

- Ampol Disclosure Officers or Ampol Market Disclosure Officers
- Ampol Secretariat

Engaging with our stakeholders

There are different channels and platforms where we engage with our audiences. Every time we engage externally, we are representing the Ampol brand. Therefore we have policies that ensure we maintain our obligations as an organisation listed on the ASX that help protect our brand.

Media

Ampol's Media policy and Z's Corporate Communications and Stakeholder Engagement policy ensure that interactions between Ampol and the media occur via the right channels and that information provided is accurate and consistent. These policies provide for an open, cooperative relationship with the media, by facilitating:

- prompt and substantive responses to media enquiries;
- provision of media releases, background briefings and other communications;
- creation of networks based on understanding of our businesses and media drivers; and
- media access to Ampol sites and facilities where appropriate.

Social Media

We understand that you may use social media in your role at Ampol and also in your private life. Ampol's Social Media Policy and Z's Social Media Policy each outline our expectations relating to the use of social media for anyone connected with our business (employees, suppliers, franchisees and business partners).

You are responsible for any material you post or publish on any social media forum, so please ensure your posts are factual, professional and respectful. Remember to be discreet, respectful and transparent about where you work, if posting in relation to Ampol.

Information Release

We are committed to providing consistent and accurate communications to appropriate audiences. The Ampol Information Release policy and Z Corporate Communications and Stakeholder Engagement policy are designed to ensure we meet our compliance, continuous disclosure and regulatory obligations. If you are preparing communications such as speeches, conference presentations or papers, university assignments, supplier requests for proposals, or any other materials to be sent to external stakeholders, you must firstly check if that is an appropriate request and – if approved - provide the material to the Corporate Affairs team for review and approval.

We do not provide information on our business to any industry analyst, or complete surveys for other companies or researchers that require us to provide information that is not already available in the public domain and which might be relied upon to make an investment decision about Ampol or our industries.

Branding & Suppliers

The corporate brands used across Ampol have an important value. In all of their uses, it contributes to our reputation and shapes how our stakeholders perceive Ampol.

All usage of logos and brands owned by Ampol are subject to stringent guidelines. You must never use our brand or our legal trademarks, including by sharing logos for use by other parties, without authorisation.

If you require a logo, image or other visual asset, please contact the Brand team via email: brand@ampol.com.au

Ampol's endorsement policy precludes Ampol from endorsing the products, equipment or services of any supplier, unless there is an explicit mutual benefit for Ampol to do so. This policy is managed by the Corporate Affairs team and covers both actual and implied endorsement, including invitations to speak at a supplier's event to current or prospective customers. This policy is in place to prohibit suppliers from using their relationship with Ampol as a means for self-promotion and potentially discouraging their competitors from seeking our business in the future.

Always:

- Contact Corporate Affairs if an incident, crisis or event occurs that may prompt media interest.
- Contact Corporate Affairs if you would like to accept a speaking event.
- Contact the Head of Corporate Affairs as soon as possible to advise of any contact with the media, or to report a problem on social media.
- Always seek advice and clarification on policies from Corporate Affairs as needed.
- Be discreet and respectful when it comes to social media.
- Use Ampol approved logos, images and other brand assets.
- Check the policy if you are asked by a supplier for permission to use the Ampol logo or refer to their relationship with Ampol in marketing material, website content, an advertisement or any other communications material.

Never:

- Communicate on behalf of Ampol unless you are an authorised company spokesperson. This includes 'off the record' or 'on background' to any media representative, journalists or bloggers.
- Provide CCTV footage to any media outlet without approval from the Head of Corporate Affairs.
- Represent, claim to represent or in any way speak on behalf of Ampol. Ensure you don't imply endorsement by Ampol of your personal views.
- Publicly discuss any matters relating to Ampol, including customers, suppliers, projects, financial matters and any other matters which may impact Ampol's reputation or competitiveness.
- Mix personal use of social media with your work in ways that could negatively impact Ampol's reputation, or damage your relationships with colleagues or others, by making offensive comments or jokes about people you know through work.
- Allow a supplier or business partner to use the Ampol logo or refer in any way to its work with Ampol via any published or recorded medium for any purpose without prior approval.



For more information

- [Ampol Media and External Communications Standard](#)
- [Ampol Endorsement Policy](#)
- [Ampol Social Media and Website Standard](#)
- [Ampol Social Media Guidelines](#)
- [Ampol Brand Guidelines](#)
- [Online Brand Asset Manager](#)
- [Information Release Policy](#)

New Zealand

- [Z Energy Corporate Communications and Stakeholder Engagement Policy](#)
- [Z Energy Social Media Policy](#)

Contact

- [Corporate Affairs](#)

Company and Personal Information

Securities trading

In your role with Ampol, you may receive or possess information that is not generally available to investors and that may have a material effect on the price or value of a company's securities. This type of information is called inside information. Through your work at Ampol, you may also become aware of another company's inside information. Be mindful that you may be, or be perceived to be, in possession of market sensitive information or inside information concerning Ampol that is not generally available to investors.

If you possess inside information about any company (including Ampol), you must not:

- trade in the securities of that company;
- advise, procure or encourage another person to trade in the securities of that company; and
- pass on inside information to any other person if they know, or ought reasonably to know, that the person may use the inside information to trade in (or procure another person to trade in) securities of that company.

Ampol has a Securities Trading Policy that has been developed to ensure Ampol employees do not trade in Ampol Limited (ASX:ALD) securities and the securities of other companies that Ampol may be in business with (including customers, suppliers, contractors and business partners) in a way that breaches the law or compromises confidence in Ampol's investor practices. The policy also nominates Designated Ampol Personnel. These people, because of their roles with Ampol, have additional obligations when considering trading in securities.

Ampol considers contravention of this policy to be a serious matter and may lead to disciplinary action, including termination of employment. Ampol employees must report any contravention of this policy to the Ampol Company Secretary, who will, in turn, report it to the Board.

Additionally, a contravention of the law relating to insider trading can have serious consequences, including criminal and civil liability, for individual Ampol employees and for Ampol.

Always:

- Seek advice from Secretariat if you are unsure if you can trade in Ampol Limited securities.
- Maintain the confidentiality of Ampol information.
- Report any leaks of Ampol confidential or inside information to your manager or to the Executive General Manager, Group General Counsel and Governance.

Never:

- Buy or sell securities of Ampol Limited (or any other company) either directly, or indirectly, through family members, other persons or entities while you are aware of inside information.
- Recommend or suggest that anyone else buy or sell securities of Ampol Limited (or any other company) while you have inside information.
- Disclose inside information to anyone inside or outside Ampol without authorisation.

Company and Personal Information

Securities trading
Personal information and privacy
Ampol's assets and information



For more information

- Securities Trading Policy

Contact

- Ampol Secretariat
- Executive General Manager, Group General Counsel and Governance

Personal information and privacy

We earn the trust of our customers and others by keeping personal information safe and complying with privacy and data protection laws. We treat personal information carefully and have strict controls in place to ensure privacy is maintained.

If you suspect that personal information has been used or disclosed inappropriately or that a data security breach involving customers' data has occurred, please immediately contact your manager and either the Legal department or your local Privacy Officer.

Always:

- Ensure consent is obtained from the individual before collecting information.
- Collect information reasonably necessary only for our business activities.
- Use personal information for the purpose for which it has been collected and not for other purposes.
- Take steps to ensure information is up to date and accurate.
- Store securely any physical documents that contain personal information.
- Delete or destroy personal information when it is no longer required.
- Seek assistance from the Legal department or the Privacy Officer if you have any questions.

Never:

- Collect unnecessary personal information.
- Allow personal information to be disclosed to third parties, unless those are authorised to receive such personal information in connection with our business activities.
- Use personal information for direct marketing unless you have consent from the individual.
- Give access to personal information to work colleagues who do not need to access it.



For more information

Australia, Singapore, US

- Ampol External Privacy Policy
- Ampol Internal Privacy Standard

New Zealand

- Z External Privacy Policy
- Z Internal Privacy Policy

Contact

- Your manager
- Legal department
- Privacy Officer

Ampol's assets and information

We are all responsible for protecting Ampol's assets against damage, fraud, theft, waste, loss and misuse and ensuring that the assets are used efficiently and for legitimate business purposes only.

You are expected to use Ampol assets only for the purposes of carrying out your responsibilities with Ampol and in the way the assets are designed to be used. Do not abuse any benefits you might receive as an Ampol employee. You must return all Ampol assets to Ampol when you leave Ampol, or when otherwise requested to do so.

Ampol's assets include:

- physical property such as plant, equipment, vehicles, computers, personal electronic devices, telephones and office supplies; and
- non-tangible property such as commercially sensitive information, confidential information, financial information, patents, trademarks and information about our business.

Our computer network is also an asset. You must always use it in a professional and ethical manner.

Ampol expects that all employees, including senior executives, directors and contractors, will not take advantage of their position or opportunities arising therefrom, nor use the property or information of the organisation or its customers, for personal gain or to cause detriment to it or its customers. If you are not sure if an activity breaches our Code, discuss the matter with your manager or make a report to the Ampol Hotline.

Always:

- Use Ampol assets for their intended business purpose.
- Comply with Ampol's policies and (where relevant) the law when using Ampol assets.
- Report any misuse, damage or theft of Ampol's assets to your manager.
- Speak up if you are aware someone is viewing or sharing inappropriate material, or is otherwise behaving inappropriately with regards to information systems or equipment.
- Maintain confidentiality and do not disclose any confidential information entrusted to you by Ampol to anyone, except when disclosure is explicitly authorised or required by laws and regulations.

Never:

- Use Ampol assets in fraudulent or illegal transactions.
- Sell Ampol assets or use them as security.
- Use Ampol credit cards for personal purchases.
- Access offensive material or download any material that violates any third party intellectual property rights (including copyright).
- Disclose confidential information regarding Ampol to anyone including work colleagues, friends, family, suppliers and customers.



For more information

- Ampol Anti-Bribery and Corruption, Gifts & Hospitality Standard
- Fraud and Corruption Control Policy
- Information Security Policy
- Internet and Email Usage Policy

Contact

- Your manager
- People & Culture

The Directory

Area	Contact details
Brand Manager	brandteam@ampol.com.au
Learning	capability@ampol.com.au
Corporate Affairs	communications@ampol.com.au or media@ampol.com.au
Employee Wellbeing & Assistance Programs	<p>Australia 1300 360 364</p> <p>Singapore +65 3158 9951</p> <p>New Zealand 0800 257 433</p> <p>US 1800 433 7916</p>
People & Culture	hradvisory@ampol.com.au
Internal Audit	internalaudit@ampol.com.au
Legal	legal@ampol.com.au
Privacy Officer	privacy@ampol.com.au
Secretariat	secretariat@ampol.com.au
<p>Ampol Hotline</p> <p>The Ampol Hotline is available 24 hours a day, seven days a week.</p> <p>It is an independent service operated by specialists who can help you report a concern.</p>	<p>In Australia, Singapore, the US + 61 1800 200 317 (see Ampol Hotline website for Singapore and USA Numbers); ampolhotline@deloitte.com.au; or www.ampolhotline.deloitte.com.au</p> <p>In New Zealand 0800 403 478 dwsnz@deloittedigital.com; or The Whistleblower Service PO Box 912028 Victoria Street West Auckland 1142</p>



