



Code of Conduct

Powering better journeys, today and tomorrow





"Each of us has a part to play in upholding Ampol's reputation to ensure our ongoing success."

Matt Halliday
Managing Director & CEO



Contents

A MESSAGE FROM THE CEO	01	3.0 HOW WE DO BUSINESS	14
AMPOL VALUES	02	3.1 Operational excellence	15
1.0 OUR CODE	03	3.2 Risk management	16
1.1 Our expectations of you	04	3.3 Communities	17
1.2 How to raise a concern	05	3.4 Working with governments and regulatory authorities	17
1.3 Does it pass the Ampol test?	06	3.5 Fair competition	19
1.4 Supporting those who raise concerns	06	3.6 Business conduct	21
2.0 OUR PEOPLE	07	4.0 HOW WE COMMUNICATE	24
2.1 Health and safety	08	4.1 Engaging with our shareholders and the financial community	25
2.2 Fitness for work	09	4.2 Engaging with our stakeholders	26
2.3 Diversity and inclusion	10	5.0 COMPANY AND PERSONAL INFORMATION	28
2.4 Discrimination, harassment and bullying	12	5.1 Securities trading	29
		5.2 Personal information and privacy	31
		5.3 Ampol's assets and information	32
		6.0 THE DIRECTORY	33



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 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 behaviour, and contribute to the reputation Ampol has 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



Connect to win

We collaborate as an integrated business to drive growth.



Find new ways

We innovate to deliver positive outcomes.



Own it

We make bold decisions and are accountable for the outcomes.



Make a difference for customers

We are connected to our customers and solve their changing needs.



Never stop caring

We keep safety first and make a positive contribution to those around us.



Our Code

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

1.0

Our Code

1.0

1.0 Our Code

The Ampol Code of Conduct sets out the standards of conduct and behaviour we expect from you as an Ampol employee, wherever you work. It has been developed to help you, and the people you work with, to uphold the Ampol 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's 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 be reviewed to check that it is operating effectively and 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.

1.1 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 the Ampol 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.

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, Ampol Legal Department or HR Advisory.

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

- breaches of regulations, laws or obligations under a contract
- breaches of Ampol's 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)

1.2 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 or Values, you are required to report this conduct to your manager or the HR Advisory team.

If you would prefer to make an anonymous report, you can contact the Ampol Hotline by phone, email or via the web (Ampol Hotline). The Ampol Hotline is available to current and past Ampol employees, suppliers, contractors and business partners (and their family members and dependents) 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 and procedures that Ampol may implement, as varied from time to time by Ampol 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.



Ampol Hotline

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

1.3 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?

Ampol Values



Connect
to win



Find new
ways



Own it



Make a
difference for
customers



Never stop
caring

1.4 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

- Whistleblowing Policy
- Whistleblowing Quick Guide

Contact

- Your manager
- HR Advisory
- Ampol Hotline
- Ampol Legal Department



Our People

- 2.1 Health and safety
- 2.2 Fitness for work
- 2.3 Diversity and inclusion
- 2.4 Discrimination, harassment and bullying

2.0

Our People

2.0

2.1 Health and safety

At Ampol we are committed to providing a 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, 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 and operate in a way that will not adversely affect the health and safety of our neighbours, customers or the public.

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, 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 and near misses are recorded accurately and in a timely manner, before leaving site.
- 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 threat to your health and safety or to anyone else.
- Tamper with or disable critical alarms.
- Delay or omit to report and record an incident, injury or near miss.



For more information

- Health and Safety Policy
- OE Incident reporting, recording and investigation requirements

Contact

- Your manager
- Occupational Health and Safety representative
- Risk and Regulatory team member

2.2 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 illegal drugs and misuse of legal drugs, alcohol or other substances can form a serious threat to health and safety. Our policy on drugs and alcohol has been established to eliminate or minimise this threat.

The Ampol Drug and Alcohol Policy applies to employees, contractors, people performing work for or on behalf of Ampol, those providing services to or for Ampol and visitors to Ampol sites. Any employee, contractor or visitor to an Ampol site may be subject to drug and alcohol testing.

Individuals must not:

- possess, sell, distribute or take illegal drugs;
- be affected by alcohol or drugs; or,
- if tested for alcohol or drugs, return a "positive" result.

Ampol's Employee Assistance Program is available to assist employees 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 Ampol's Drug and Alcohol Policy 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

- Drug and Alcohol Policy
- Drug and Alcohol Procedures
- Occupational Wellness Policy

Contact

- Risk and Regulatory team member
- Occupational Health and Safety representative
- HR Advisory
- Employee Assistance Program

2.3 Diversity and Inclusion

At Ampol, we believe in the advantages of a diverse and inclusive workplace. Ours is a work environment where individuals of varied backgrounds and perspectives are welcomed, encouraged and given the opportunity to contribute to their full potential, without encountering prejudice or inappropriate workplace behaviour (e.g. discrimination, harassment or bullying).

By diversity, we mean the prevalence of difference in our workplace, including 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 Diversity and Inclusion Policy at all times. Any actions or behaviours which do not comply with our policy 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 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 diversity 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 Diversity and Inclusion Policy.



For more information

- Diversity and Inclusion Policy

Contact

- Your manager
- HR Advisory
- Employee Assistance Program

Human Rights

At Ampol, because we believe 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 Organization 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.

2.4 Discrimination, harassment and bullying

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

- Harassment and Bullying Prevention Policy

Contact

- Your manager
- HR Advisory
- Ampol Hotline
- Employee 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 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 health and safety.

An aerial photograph of a winding asphalt road with white lane markings, curving through a dense, lush green forest. The road starts from the bottom left and curves towards the top right. A small white vehicle is visible on the road in the lower-left quadrant.

How we do business

- 3.1 Operational excellence
- 3.2 Risk management
- 3.3 Communities
- 3.4 Working with governments
& regulatory authorities
- 3.5 Fair competition
- 3.6 Business conduct

3.0

How we do business

3.0

3.1 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).

Operational Excellence is the systematic management of safety, health, environment, reliability and efficiency to achieve world-class performance. The Ampol OEMS provides 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

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

Contact

- Your manager
- Occupational Health and Safety representative
- Risk and Regulatory team member

3.2 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 the Ampol Risk Management Policy 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

- Risk Management Policy

Contact

- Your manager
- Occupational Health and Safety representative
- OE team member
- HR Advisory
- Ampol Hotline

3.3 Communities

Ampol is committed to supporting the communities in which we work and live. 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 the local communities in which we operate to provide them with information about major changes to our infrastructure in Australia. It is important to us to ensure that our neighbours understand the nature of the change and any impacts the change may have. We are proud of our strong relationships with these communities and continue to develop our relationships with them.

Workplace giving

Ampol enables employees to contribute directly to the work of our not-for-profit partners by providing regular team volunteering opportunities around Australia. As part of Ampol's Fuelling Change program, the Australian team can provide financial support to a range of charities and not-for-profit organisations. Ampol will match your contributions dollar for dollar.

Corporate sponsorship

Our corporate sponsorship program partners with a select group of Australian organisations that share our values and leverage 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.

3.4 Working with Governments & Regulatory Authorities

Ampol operates in a highly regulated environment across all aspects of our business in Australia and overseas.

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



For more information

- Ampol Corporate Affairs

Contact

- Head of Corporate 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 to 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 Ampol Legal Department. In the first instance, contact your usual legal representative. If your usual legal representative is not available, other members of the Ampol Legal Department will assist. If after hours legal assistance is required, please contact the Ampol Duty Manager or the Chief Governance & Risk Officer.

Always:

- Report to Government Affairs 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 Regulators which is potentially more serious, contact the Ampol 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 Ampol 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
- Competition and Consumer Act Compliance Policy
- Competition and Consumer Act Compliance Policy and Manual

Contact

- Government Affairs
- Ampol Duty Manager
- Ampol Legal Department

3.5 Fair competition

Ampol is committed to complying with all relevant competition and consumer laws that apply to our business in Australia and in all other locations in which we operate. These laws:

- promote and protect competition by prohibiting various kinds of anti-competitive behaviour and restrictive trade practices such as price fixing and resale price maintenance; and
- protect consumers and encourage fair trading.

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

A breach (whether actual or perceived) of competition and consumer 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 Policy and Manual set out our policy 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 the Consumer and Competition Act Compliance Policy to your manager and the Ampol Legal Department.
- Obtain approval from the Ampol Legal Department before submitting any information to a competition regulator.



Can you be liable for making a misleading and deceptive statement even though you did not make the statement with the intention to mislead or deceive?

Yes. A person can be guilty of making a misleading and deceptive statement even though they did not have the intention to mislead or deceive. What matters is whether the statement is in fact misleading or deceptive.

Never:

- Discuss allocating customers, suppliers, geographical areas or pricing with competitors.
- Act in an unfair manner. Big business is 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 to not 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.



You are at an industry meeting with competitors and some competitors start discussing prices to be charged for the upcoming period. Is it okay if you do not participate in the discussion but stay at the meeting?

No. You should protect yourself and Ampol against breaching competition and consumer laws by:

- not taking part in the discussion;
- leaving the meeting;
- ensuring the meeting secretary records in the minutes that you left the meeting; and
- reporting the meeting to the Ampol Legal Department.

**For more information**

- Competition and Consumer Act Compliance Policy
- Competition and Consumer Act Compliance Manual

Contact

- Ampol Legal Department
- Ampol Hotline

3.6 Business Conduct

By upholding the highest ethical, transparent and responsible conduct in all our business dealings, we live our Ampol 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 ever 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 substantial fines and jail. 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 Ampol 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 Ethical Business Practices Policy.

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 Australia, Singapore, United States 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 Ampol Legal Department.

Always:

- Report any instance of bribery, corruption or fraud to your Manager, Ampol Legal Department, HR Advisory or Ampol Hotline.
- Give and receive gifts, benefits and hospitality in accordance with the Ethical Business Practices Policy.
- Seek advice if you encounter a sanctions issue.

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 is not connected with 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.



For more information

- Ethical Business Practices Policy
- Travel and Expense Policy

Contact

- HR Advisory, Ampol Legal Department
- Your Manager
- Ampol Hotline



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 agents 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 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 = Australian and International laws or orders that impose restrictions on the ability of parties to transact with one another. They are also known as: Trade controls, boycotts, embargoes, export controls and economic sanctions.



How we communicate

- 4.1 Engaging with our
shareholders and the financial
community
- 4.2 Engaging with our stakeholders

4.0

How we communicate

4.0

4.1 Engaging with shareholders and the financial community

Ampol is committed to providing shareholders with clear and balanced information about our business and performance. Our Shareholder Communication Policy sets out Ampol's approach to communicating effectively with our shareholders.

Investors and Analysts

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

- Chairman;
- Managing Director & CEO;
- Chief Financial Officer; and
- Head of Investor Relations.

You are not authorised to communicate with investors or analysts on behalf of Ampol unless you have previously received written authorisation from the 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. We have a Continuous Disclosure Policy to ensure that we meet all of our obligations.

Ampol will immediately release to the market any information or major development which a reasonable person would expect to have a material effect on, or lead to substantial movement in, the value of our shares, subject to any exceptions under the ASX Listing Rules.

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:

- Managing Director & CEO;
- Chief Financial Officer; and
- Chief Governance & Risk Officer.

Ampol has also appointed the Chief Governance & Risk Officer 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 the information to have a material effect on the price or value of Ampol's securities (market sensitive information), you must immediately report it to a Disclosure Officer or the Chief Governance & Risk Officer.



For more information

- Shareholder Communication Policy
- Continuous Disclosure Policy

Contact

- Disclosure Officers, Market Disclosure Officers or the Chief Governance & Risk Officer
- Ampol Secretariat

4.2 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 ASX-listed organisation and that help protect our brand.

Media

Ampol's Media policy ensures that interactions between Ampol and the media occur via the right channels and that information provided is accurate and consistent. The Media Policy provides 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. Our Social Media Policy outlines 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 Information Release policy is 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 Ampol corporate brand has an important value. In all its uses, it contributes to our reputation and shapes how our stakeholders perceive Ampol. All usage of the Ampol logo and brand is subject to stringent guidelines. You must never use our brand or our legal trademarks, including by sharing the logo 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 any of 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.
- Source logos, images and other brand assets from the online BAM.
- 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 or 'off the record' or 'on background' to any media representative, including journalists and bloggers.
- Provide CCTV footage to any media outlet without approval from 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.
- Don't mix personal use of social media with your work in ways that could negatively impact Ampol's reputation. Don't damage your relationships with colleagues or others through social media 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**

- Media Policy and Social Media Policy
- Ampol Brand Guidelines
- Online Brand Asset Manager
- Endorsement Standard
- Information Release Policy

Contact

- Corporate Affairs



Company and Personal Information

- 5.1 Securities trading
- 5.2 Personal information and privacy
- 5.3 Ampol's assets and information

5.0

Company and Personal Information

5.0

5.1 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 staff 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 staff must report any contravention of this policy to the Chief Governance & Risk Officer, 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 staff and for Ampol.



Through your role, you have become aware of a significant and confidential transaction (for example, a material business acquisition). Can you sell or buy Ampol shares?

No. You must not trade in the securities of either Ampol or the other party to the transaction until after it has been publicly disclosed by Ampol to the ASX.

Always:

- Seek advice from Ampol Secretariat if you are unsure if you can trade in securities.
- Maintain the confidentiality of Ampol information.
- Report any leaks of Ampol confidential or inside information to your manager or to the Chief Governance & Risk Officer.

Never:

- Buy or sell securities of Ampol (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 (or any other company) while you have inside information.
- Disclose inside information to anyone inside or outside Ampol without authorisation.

**For more information**

- Securities Trading Policy

Contact

- Ampol Secretariat
- Chief Governance & Risk Officer

5.2 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 Ampol Legal Department or Ampol's Privacy Officer.



Personal information is any information which could identify an individual either from that information alone or in combination with other information which is reasonably likely to come into the possession of Ampol. Personal information can include general information such as a person's name, home address, email and telephone numbers. It also includes more sensitive personal information such as financial records, government issued identification numbers (including Medicare, driver's licence and passport), credit scores, credit card numbers, medical records, educational and employment records.

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 Ampol Legal Department if you have any questions.

Never:

- Collect unnecessary personal information.
- Allow personal information to be disclosed to third parties.
- 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

- Privacy and Credit Reporting Policy

Contact

- Your manager
- Ampol Legal Department
- Ampol Privacy Officer

5.3 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 privileges or 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

- Ethical Business Practices Policy
- Fraud and Corruption Control Policy
- Information Security Policy
- Internet and Email Usage Policy

Contact

- Your manager
- HR Advisory

The Directory

6.0

Area	Email or Website	Phone
Brand Manager	brandteam@ampol.com.au	
Learning	capability@ampol.com.au	
Corporate Affairs	communications@ampol.com.au; media@ampol.com.au	+61 2 9570 5727
Employee Assistance Program		1300 360 364 (within Australia) +61 2 8295 2292 (outside Australia)
HR Advisory	hradvisory@ampol.com.au	+61 2 8114 2030
Internal Audit		+61 2 9250 5113
Legal	__legal@ampol.com.au	
Privacy Officer		+61 2 9250 5894
Secretariat	secretariat@ampol.com.au	+61 2 9250 5088
Ampol Hotline		
The Ampol 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.	www.ampolhotline.deloitte.com.au or ampolhotline@deloitte.com.au	1800 200 317
Chief Governance & Risk Officer	michael.abbott@ampol.com.au	

AMPOL

Powering better journeys,
today and tomorrow





www.ampol.com.au