

Whistleblower Policy

Policy Statement - Principles

Arrow Energy is committed to a culture of compliance, ethical behaviour, good corporate governance and continuous improvement.

Arrow Energy encourages the reporting of any instances of suspected or actual misconduct involving Arrow Energy's business, and will ensure that those persons who make a disclosure can do so without the fear of disadvantage, adverse action or victimisation.

This policy will be made available to officers and employees of the company via its internal and external websites.

What is a Whistleblower?

For the purposes of the policy, a Whistleblower is an Eligible Person who makes or attempts to make a disclosure of Reportable Conduct.

An Eligible Person means our current and former:

- directors, employees, secondees
- contractors, consultants, suppliers, service providers (or their employees or subcontractors);
- landholders and other external stakeholders; or
- a spouse, relative or dependant of an individual listed above

What is Reportable Conduct?

Consistent with the principles contained in Arrow Energy's Code of Conduct, Arrow Energy encourages the reporting of suspected or actual misconduct. For the purposes of this policy, misconduct or improper conduct ("Reportable Conduct") is a broad term that can, but not limited to include:

- dishonest, fraudulent or corrupt activity, including bribery;
- illegal activity (including theft, violence, intimidation, criminal damage to property);
- unethical behaviour or serious breach of Arrow's Code of Conduct or other policies and procedures;
- conduct which is potentially damaging to Arrow, Arrow's employees, or third parties such as unsafe work practices, environmental damage, health risks or abuse of Arrow property or resources;
- conduct which may cause financial loss to Arrow or damage its reputation or be otherwise detrimental to Arrow's interests;
- harassment, discrimination, victimisation or bullying.

How to make a disclosure

Arrow Energy has several methods for making a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct:

a) Protected Disclosure Officer

If you wish to make disclosures to someone within Arrow Energy, we request that disclosures are made to the Governance, Risk and Assurance (GRA) Manager as our Protected Disclosure Officer.

Where you are not comfortable to make a report to the above Protected Disclosure Officer, you can make a disclosure to a senior manager within the company (defined as someone who is a General Manager or above) or to the auditors*.

b) Arrow Energy Whistleblower Service:

Arrow Energy also maintains an external hotline and reporting service independently monitored by Deloitte. The service provides anonymity. You will not be asked to reveal your identity unless you choose to advise otherwise. When submitting a disclosure, you should provide as much detail as possible to ensure the matter can be fully investigated.

- **Phone (Toll Free) – 1800 728 593**
- **Email – arrow@deloitte.digital.com.au**
- **Internet – [HALO Whistleblower Service](#)**
- **Reply Paid Post – Arrow Energy, Reply paid 12628 A'Beckett Street, Victoria 8006**

When making a disclosure, the type of information you need to provide include:

- Names of people involved;
- Names of any witnesses;
- Date, time and location of incident(s);
- Details of any proof;
- Money or assets involved;
- How often the incident has happened.

*Auditors refer to internal auditors as per the Internal Audit Charter and external financial statement auditors as appointed by the Arrow Board.

Whistleblower Policy (continued)

Investigations of Reportable Conduct

Arrow Energy will investigate all matters reported under this policy as soon as practicable after the matter has been reported. Where appropriate and able, Arrow Energy will provide timely updates to you regarding the investigation's progress and/or the outcome (subject to considerations of the privacy of those against whom the allegations are made).

All investigations will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Reportable Conduct and the circumstances.

As soon as practicable upon receipt of a disclosure, if the disclosure is not anonymous, a Protected Disclosure Officer or Investigator will contact you to discuss the investigation process and such matters as are relevant to the investigation.

Where a disclosure is submitted anonymously, Arrow Energy will conduct the investigation based on the information provided.

Protection for Whistleblowers

Arrow Energy is committed to ensuring confidentiality in respect of all matters raised under this policy, and those who make a disclosure are treated fairly and do not suffer detriment.

a) *Protection against detrimental conduct*

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

If you are subjected to detrimental treatment as a result of making a report under this policy you should inform the Protected Disclosure Officer or senior manager within your reporting line immediately.

b) *Protection of your identity and confidentiality*

Subject to compliance with legal requirements, upon receiving a report under this policy, Arrow Energy will only share your identity as a whistleblower or information likely to reveal your identity if:

- you consent;
- the concern is reported to the Australian Securities and Investments Commission ("ASIC"), the Australian Prudential Regulation Authority ("APRA"), the Tax Commissioner or the Australian Federal Police ("AFP"); or
- the concern is raised with a lawyer for the purpose of obtaining legal advice or representation.

If Arrow Energy needs to investigate a report, it may disclose information that could lead to your identification, but it will take reasonable steps to protect your identity.

Any disclosures of your identity or information likely to reveal your identity will be made on a strictly confidential basis.

c) *Protection of files and records*

All files and records created from an investigation will be retained securely.

Unauthorised release of information to someone not involved in the investigation (other than senior managers or directors who need to know to take appropriate action, or for corporate governance purposes) without your consent as a whistleblower will be a breach of this policy.

Whistleblowers are assured that a release of information in breach of this policy will be regarded as a serious matter and will be dealt with under Arrow' disciplinary procedures.

Duties of Employees

As per Arrow Energy's Code of Conduct, it is expected that employees of Arrow Energy who become aware of actual, or suspect on reasonable grounds, potential cases of Reportable Conduct will make a report under this policy or under other applicable policies.



Qian Mingyang, Chief Executive Officer

Date Completed: October 2019 - Review due: October 2021