

# Whistleblower Policy

## Policy statement

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, employees and key stakeholders of the company via its internal and external websites.

## Who 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 and secondees.
- contractors, consultants, suppliers, service providers (or their employees or subcontractors).
- landholders and other external stakeholders; or
- a spouse, relative or dependent 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 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

- 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 breaches the *Modern Slavery Act 2018 (Cwth)*
- conduct which may cause financial loss to Arrow or damage its reputation or be otherwise detrimental to Arrow's interests, and
- engaging in, or threatening to engage in, detrimental conduct against a person who has made (or may be planning to make) a disclosure under this policy.

## Qualifying Disclosure

An Eligible Person qualifies for protection under the Corporations Act if their disclosure meets the following criteria:

- the report is made by an Eligible Person
- the report is made directly to an Eligible Recipient, Australian Securities and Investments Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or another Commonwealth body prescribed by regulation, and
- the Eligible Person has reasonable grounds to suspect that the information concerns Reportable Conduct in relation to Arrow.

Disclosures that relate solely to personal work-related grievances do not qualify for protection under the *Corporations Act*.

## 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.

If you wish to make disclosures to someone within Arrow Energy, we request that disclosures are made directly to one of the people below (Eligible Recipients):

- General Counsel
- Principal Risk, Compliance and Assurance
- A senior manager within the company (General Manager or above)
- Internal or External auditors\*.

Where you are not comfortable making a report to the above Eligible Recipients, you can also make a disclosure to the Arrow Energy Whistleblower Service (details below).

## Arrow Energy Whistleblower Service (HALO)

Arrow Energy 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.

Reporting to the Whistleblower Service can be made via:

- **Phone (Toll Free) – 1800 728 593**
- **Email – [arrow@deloitte.digital.com.au](mailto: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 includes:

- Names of people involved, including any witnesses.
- Date, time and location of incident(s).
- Details of any evidence.
- 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 Energy Board.*

## Investigations of Reportable Conduct

Arrow Energy will review and, where appropriate, 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 any confidentiality constraints.

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 surrounding circumstances.

As soon as practicable upon receipt of a disclosure, if the disclosure is not anonymous, an Eligible Recipient 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, where possible, conduct an 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 that those who make a disclosure are treated fairly and do not suffer detriment.

### a) Protection against detrimental conduct

Whistleblowers are protected from detrimental conduct or the threat of detrimental conduct, as a consequence of making a disclosure under this policy.

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 an Eligible Recipient or raise a report through the Arrow Energy Whistleblower Service immediately.

This protection also applies to individuals conducting or participating in an investigation.

### 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 ASIC, APRA, the Tax Commissioner; the Australian Federal Police; or a State based police service, 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

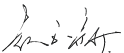
All files and records created from an investigation will be retained securely and only disclosed to relevant people as required or allowed under this policy and the law.

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.



05/06/2024

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**Zhengxin Peng, Chief Executive  
Officer**

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Review: March 2026