



DOCUMENT DETAIL

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DOCUMENT CLASSIFICATION

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**DOCUMENT REVISION HISTORY**

REV NO.	DATE	REVISION DETAILS	AUTHOR
0.0	01/06/2018	New Document.	Global Director, Legal
1.0	31/07/2020	Inclusion of the sentence 'In the event of a conflict between this policy and local laws, local laws will prevail.'	Global Director, Legal
2.0	21/06/2024	<ul style="list-style-type: none"> <li>Streamlined document format with MGMT.</li> <li>Changed the document process owner title due to business realignment.</li> <li>Update Division reference to reflect current organisation structure.</li> <li>Rename Audit and Risk and Management Committee ("ARMC") to Audit Risk and Sustainability Committee ("ARSC")</li> <li>Section 3: Scope - amend sentence of "In the event of a conflict between this policy and local laws, local laws will prevail." to "In the event of a conflict between this policy and local law, contact The Legal &amp; Integrity department of AET immediately. As a general rule, AET will apply whichever is stricter and always on the basis that AET remains in full compliance with applicable laws."</li> </ul>	General Counsel & Chief Integrity Officer



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## **1.0 Language Convention**

In this document, the use of:

- The word "shall" indicate a course of action that is required or mandatory. The English language equivalent or interchangeable term for "shall" is "must",
- The word "should" indicate a preferred course of action,
- The word "may" indicate a possible course of action.

## **2.0 Objective**

The purpose of this policy is to protect the integrity of AET's decision-making process, to enable AET's stakeholders to have confidence in AET's integrity, and to protect the integrity and reputation of AET's Employees.

This policy sets out what AET considers to be a conflict of interest in order to protect the AET business and AET's Employees from any appearance or accusation of impropriety and provides guidance to Employees on when to declare any potential conflict of interest.

## **3.0 Scope**

This policy applies to all jurisdictions in which AET operates and covers all individuals working on shore and off shore at all levels and grades on behalf of any company within the AET Group in any capacity whatsoever, including without limitation, the senior management team, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as "Employees" throughout this policy).



This policy does not form part of any Employee's contract of employment and AET may amend it at any time.

In the event of a conflict between this policy and local law, contact The Legal & Integrity department of AET immediately. As a general rule, AET will apply whichever is stricter and always on the basis that AET remains in full compliance with applicable laws.

#### **4.0 What is a conflict of interest**

A conflict of interest may occur when the interests or activities of an Employee affects their ability to make objective decisions on behalf of AET. Conflicts of interest can be direct or indirect and refer not only to the interests of the Employee but also to those of the Employee's family members and close friends.

A conflict of interest may occur in a number of different ways, for example:

- Outside jobs and affiliations with competitors, customers or suppliers.
- Working with close relatives, especially those who are public/government officials.
- Serving as a board member of another organisation.
- Investments, including those of close relatives, which might influence or appear to influence your judgement.

#### **5.0 What is AET's policy on Conflicts of Interest**

Employees must avoid situations or transactions in which their personal interests could conflict, or might be seen to be in conflict, with the interests of AET. If there is a potential for conflict, Employees must ensure that the interests of AET take priority. Employees must disclose any conflict of interest or perceived conflict in accordance with the procedure set out in this Policy.

In the event that an Employee has a conflict of interest, either existing or potential, they must declare the conflict in accordance with this policy and must not be involved



in managing or monitoring any relationship, project or contract in which they have an interest except with the prior permission of the CEO.

Any relevant declared conflict of interest, or potential conflict of interest, will be considered by **The Legal & Integrity department of AET**. AET reserves the right to take any necessary action or put in place any necessary procedure to mitigate any relevant conflict. AET may elect to introduce information barriers to restrict the release of information to Employees who have declared a relevant interest.

## **6.0 Declaration of Conflicts of Interest**

AET maintains a 'Register of Interests' in order to monitor interests and relationships of Employees which may give rise to a conflict of interest.

Upon being offered employment with AET, all Employees will be required to make a full, written disclosure of any interest, such as relationships and posts held, that could potentially result in a conflict of interest. AET shall retain this disclosure, which will be updated as appropriate.

If during the course of employment with AET an Employee becomes aware of a conflict of interest or a potential conflict of interest, Employees must make an updated declaration using the online portal located on the Bridge as soon as they become aware of the conflict.

Employees should always err on the side of caution and disclose any relevant external interests they may have.

Employees will be required to review and confirm the accuracy of their declared interests on an annual basis.

The Register of Interests shall be maintained and reviewed by **The Legal & Integrity department of AET** and a summary of reports received under this policy may be communicated to the **Audit Risk and Sustainability Committee**.

## **7.0 Intimate Relationships**

AET strongly discourages any romantic workplace relationships. Any employee who embarks on a close personal relationship with a colleague working in the same



department or team must declare the relationship to the Human Resources Department. Any declarations will be treated in strict confidence.

Employees may not, without obtaining approval from the Human Resource Department, supervise either directly or indirectly any Employee with whom they have a close personal relationship (or, in the case of ELT Members or Directors, approval must be given from the relevant Board of Directors). In such circumstances AET reserves the right (in consultation with the Employees) to transfer one or both Employees to a different department or team. In the event that it is not possible to transfer at least one of the Employees and there is no other reasonable course of action, AET reserves the right to dismiss one or both of the Employees.

## **8.0 Alternative Employment**

Employees shall devote the whole of their time, attention, skills and abilities during their working hours to their duties and the business of the AET Group.

Employees may not, except with prior written consent of their ELT or the CEO, work for, be employed by or have any interest in any other business outside of the AET Group.

In the event that consent for alternative employment is granted, employees are also required to notify their HR Business Partner of their alternative employment as soon as possible.

## **9.0 Your Responsibilities**

It is every Employees' responsibility to ensure that they understand and comply with the terms of this Policy.

Should an Employee be in any doubt as whether a potential conflict needs to be declared they should seek advice from **The Legal & Integrity department of AET**. Failure to make a declaration of a new conflict of interest as soon as the Employee becomes aware of the conflict arising may be considered as a disciplinary offence.



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## **10.0 Review of procedures and training**

AET will provide training to all Employees on a regular basis. The level of training an Employee receives will depend on the specific risks associated with their role.

If an Employee considers that they would benefit from refresher training, they should contact the Human Resources Department.

## **11.0 Consequences of Non-compliance**

Non-compliance with this Policy could have serious consequences for AET, including criminal penalties, loss of customers and reputation damage.

Any Employee who fails to declare a conflict or potential conflict of interest or who breaches this Policy may face disciplinary action, which could result in dismissal for misconduct.