

Policy

(Board Approved)

Title: Confidential Information Policy

Document Number – GOV-POL-27

1.0 Policy Statement

This Policy sets out our expectations about the way in which confidential information is to be dealt with at Stanwell.

Information about Stanwell and its business activities may be commercially sensitive, confidential and or legally privileged. Stanwell may also owe obligations of confidentiality to another party in relation to confidential information of that party.

2.0 Scope

This Policy applies to Stanwell's directors and employees and to all contractors working for or at Stanwell (**our people**).

3.0 Purpose

This Policy establishes a common understanding of the appropriate conduct expected of our people in respect to the way in which confidential information is to be dealt with at Stanwell.

Generally:

- you **must not** disclose confidential information to anyone outside of Stanwell;
- sometimes you **may not** be able to disclose confidential information to other Stanwell employees or contractors; and
- you **must** immediately report any breach of obligations of confidentiality you become aware of.

4.0 Content

Confidential Information is information which is not publicly available, that our people have obtained in the course of their employment or engagement at Stanwell or obtained during the discharge of their official duties to Stanwell. It includes trade secrets, techniques, administration, marketing and business methods, unpublished financial information, personal information as defined by the *Privacy Act 1988* (Cth) and also includes communications relating to legal advice on any topic, including litigation with Stanwell's lawyers (both internal and external).

You have a duty to Stanwell **NOT** to disclose any confidential information you have obtained because of your relationship to Stanwell.

Stanwell may also owe obligations of confidentiality to a third party in relation to the confidential information of that party. You must comply with these obligations when dealing with confidential information of that third party.

You may only deal with confidential information in the way set out in the Confidential Information Procedure.

In particular, you must never use or disclose confidential information to gain a benefit for you or someone else.

If you have any doubts about whether you can use or disclose confidential information, speak with your supervisor or manager.

To help you follow this Policy, we will:

- train you about the Policy, Confidential Information Procedure and your obligations under the relevant legislation, codes and guidelines;
- maintain a procedure to set out what confidential information is and how to deal with it;
- provide adequate resources to manage and investigate breaches of the policy and procedure; and
- encourage you to tell your supervisor or manager if you become aware of a breach relating to confidential information.

Examples:

- You have left Stanwell to work for another organisation. You must not use confidential information about Stanwell at your new employer.
- A contractor working for Stanwell needs plans and documents to do their work. You must ensure that you do not provide this information, unless it is expressly permitted by your supervisor or manager. In certain circumstances, the contractor may be required to sign a confidentiality agreement before they are provided with the information.
- In your job, you obtain personal information about an employee of Stanwell. You must not disclose that information to any other person.
- The internal legal team has provided you with advice regarding an agreement or potential problem. You must not disclose that information to any other person, including other Stanwell employees, unless expressly authorised to do so by the General Counsel or Deputy General Counsel.

If you fail to comply with this Policy, disciplinary action may be taken against you.

5.0 Responsibilities and Authorities

Our people must:

- (a) not use or disclose any confidential information for any purpose other than to carry out your official duties to Stanwell or as permitted by Stanwell;
- (b) maintain any confidential information for which you are responsible in the manner required by Stanwell;
- (c) comply with this Policy, the Confidential Information Procedure and relevant legislation, codes and guidelines;
- (d) follow the Protected Disclosures Procedure to report any breaches; and
- (e) ask your supervisor or manager if you do not understand any part of the Policy or Confidential Information Procedure, or if you are unsure if information is confidential.

Managers and supervisors must:

- (a) make sure their employees and contractors know about this Policy and Confidential Information Procedure; and
- (b) ensure that procedures for using, disclosing and maintaining confidential information are complied with.

The **Company Secretary** must:

- (a) from time to time, review this Policy, the Confidential Information Procedure and any changes in the law, and make recommendations regarding any necessary policy changes and implications;
- (b) advise the Executive Leadership Team and the Board about policy changes and implications for the policy and procedure;
- (c) give advice, guidance and assistance about this Policy and the Confidential Information Procedure; and
- (d) ensure appropriate records are kept about every breach.

The **Executive General Manager Business Services** must ensure our people are trained on this Policy, the Confidential Information Procedure and relevant legislation, codes and guidelines;

The **Executive Leadership Team** members must comply with this Policy and the Confidential Information Procedure and make sure that this Policy and the Confidential Information Procedure are followed.

The **Stanwell Board** has ultimate accountability for this Policy.

6.0 Review and Consultation (Prior to Approval)

The Executive Leadership Team members and the Stanwell Board of Directors.

This Policy is required to be reviewed, at a minimum, every 2 years.

7.0 Communication Plan (After Approval)

This Policy is available electronically in Content Manager and is available on GenNet.

8.0 Definitions

Official duties	are the day to day activities performed by our people as part of their role accountabilities
Our people	refers to Stanwell directors, employees and all contractors working for or at Stanwell, in your capacity as a director, employee or contractor of Stanwell.
'Stanwell' and 'Corporation'	refers to Stanwell Corporation Limited

9.0 References

Code of Conduct
 Privacy Policy
 Confidential Information Procedure
 Protected Disclosure Procedure

10.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Approved By
0	29.02.2012	Policy created to reflect the requirements after the merger of Stanwell, Tarong Energy Corporation and Mica Creek and Swanbank sites into the newly formed Stanwell Corporation Limited	K. Buckley	Board
1	29.04.2014	Minor amendments made to reflect the 'current' title of the Executive General Manager allocated 'responsibility' under this Policy and to reflect current governance processes	K Buckley	Board
2	12.07.2016	Minor grammatical amendments made as a result of biennial review	K Buckley	Board
3	10.09.2018	Biennial review undertaken - no amendments required	K Buckley	Board
4	28.10.2020	Biennial review undertaken. Only minor administrative changes required at this review.	K Buckley	Board
5	6.10.2022	Biennial review undertaken – no amendments required.	K Buckley	Board