



Zenith Energy Social Compliance Policy

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1. INTRODUCTION – SOCIAL COMPLIANCE & RESPONSIBILITY

Zenith Energy Pty Ltd as a company and its directors, is committed to ethical practices consistent with the International Labour Organisation (ILO) core conventions and Australian federal and state laws, operating in a safe and healthy manner, with consideration for the environmental impacts of our activities and of course the performance of the business in meeting customer requirements. Ethical business practices are also implemented including prohibited activities related to bribery and corruption.

Zenith Energy (the ‘company’) has adopted a Code of Conduct which applies to our own business but also those who work with us, including suppliers. This Code of Conduct is summarised as:

- Prohibiting any form of forced labour or trafficking (referred to as Modern Slavery)
- Prohibiting the use of child labour
- Prohibiting charging of recruitment fees to workers
- Prohibiting the with-holding of worker identity or immigration documents
- Requiring that workers are provided with a safe and healthy working environment.
- Workers are engaged in compliance with applicable employment laws and codes of practice including working hours.
- Permitting freedom of association and the right to collective bargaining
- Prohibition of bribery and corruption

Additionally, we are committed to developing and maintaining an Environmental Management System which identifies our environmental impacts and promotes control where appropriate, compliance and continual improvement.

This policy document sets out our objectives and management of issues around social compliance which are intended deliver and ensure compliance to the above commitments but within Zenith Energy and our supply chain.

The ultimate responsibility for this policy and related procedures, and their implementation rests with the Zenith Energy Managing Director and the Zenith Energy Board.

2. POLICY


Zenith Energy has developed, maintained, and implemented a wide range of relevant policies, including:

- Modern Slavery, Human Trafficking and Labour Policy
- Anti-bribery and Corruption Policy

The above policies are approved by the Zenith Energy Board and subject annual review to ensure their continued relevance and adequacy.

Additionally, the company has developed detailed information for employees which details other procedures and policies that employees need to be aware of, including details of their statutory rights.

All policies are made available to staff internally. Additionally, the Modern Slavery, Human Trafficking and Labour Policy is made publicly available to interested parties on request and via the company website.

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3. EMPLOYMENT – RECRUITMENT AND SELECTION

Recruitment and selection processes will be conducted in a fair and equitable manner consistent with applicable Australian industrial relation laws.

Children of compulsory school age will not be employed by Zenith Energy either directly or through any third party or agency. The age and Right to Work in Australia are verified during the recruitment process and records retained as evidence.

Zenith Energy will ensure compliance with the Code of Conduct and policies for those it employs. Bonds and deposits will not be sought from employees and originals of passports or right to works in the Australia evidence shall not be retained by the company. A photocopy of a passport or other identification shall only be used in confirming an employee identity.

The use of agency staff will be limited and, if used, the agency provider shall be subject to specific requests for information including through Supplier Questionnaire and compliance via audit to review agency procedures and adherence to the Code of Conduct and Australian law.

Inductions will include communications of policies and procedures related to environmental, health & safety and other social compliance policies.


The Zenith Energy Human Resources department is responsible for ensuring compliance of all recruitment, selection, and induction processes as well as on-going compliance to Australia and relevant Australian laws during employment.

4. DISCRIMINATION, HARASSMENT AND RETALIATION

Zenith Energy is opposed to discrimination of any kind the basis of, but not limited to:

- Race.
- Caste.
- National origin.
- Religion.
- Age.
- Disability.
- Gender.
- Marital status.
- Sexual orientation.
- Union membership.
- Ethnic/national origin.
- Military status, or political affiliation.

Policy and procedures relating to grievance processes are clearly defined and available to all employees.

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5. TERMS AND CONDITIONS OF EMPLOYMENT AND WAGES AND BENEFITS

All terms and conditions of employment will be defined within the employment contract which will be provided in writing to all employees and shall meet the requirements of Australian law including working hours and wages (including details of any lawful deductions). Other than for changes in salary, variations to the terms and conditions of employment will also be confirmed in writing.

Employees will be provided with written wage statements/slips.

Zenith Energy is responsible for ensuring the effective issue of all statements of terms and conditions.

6. WORKING HOURS

Employees working hours will not exceed those defined by Australian law. Additionally working hours shall not exceed those specified by the Australian law or other applicable requirements.

All overtime is voluntary and compensated compliant with Australian law.

Zenith Energy is responsible for monitoring working hours for all employees.

7. CHILD LABOR

Zenith Energy is opposed to the exploitation of children and use of child labour. Minimum age of employment according to Australian law is verified as part of the recruitment and selection process.


Employees aged less than 18. will be subject to a specific health & safety risk assessment which will consider aspects such as their maturity and awareness of workplace risks.

Those who work with Zenith Energy including suppliers are required to comply with our Code of Conduct and Modern Slavery, Human Trafficking and Labour Policy which includes the prohibition of child labour. In the event of any identified breach, timely remediation and corrective action will be taken as detailed below. Such actions must include the child attending schooling where they are of compulsory school age.

Zenith Energy is responsible for the implementation of this procedure for its employees/workers. Supply chain compliance is the responsibility of the Zenith Energy Managing Director and assigned to those departments who have responsibility for supply chains.

8. HEALTH AND SAFETY

Zenith Energy will comply with applicable Occupational Health & Safety (OH&S) laws within Australia. In practical terms this will translate into risk identification, risk assessment, elimination, or management of risk by managing its safe systems of work. All aspects of the company’s OH & S shall be subject to periodic planned review Employees and those working with us onsite and offsite will be provided with appropriate guidance, training, resources, and equipment to ensure a safe and healthy working environment.

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9. BRIBERY AND CORRUPTION

Bribery or corruption is not tolerated within Zenith Energy, its business practices, including supply chains.

Should any issue be identified within the Supply Chain, corrective action will be taken as appropriate.

10. SUPPLY CHAIN MANAGEMENT

Based upon risk, those who work with Zenith Energy including suppliers will be required to confirm their commitment to our Code of Conduct and Modern Slavery, Human Trafficking and Labour Policy and are required to provide evidence of compliance or implementation including within their own supply chain.


Suppliers will be subject to review and may periodically be required to complete the supplier questionnaire and declaration to comply with our Code of Conduct.

Dependent upon risk and information provided by suppliers, the company may implement additional screening including supplier visits/audits and reviews of the supplier control systems and actions to prevent prohibited activities.

Should a breach relative to our policies and Code of Conduct be identified as part of the above processes, at any stage, remediation and corrective action will be taken as detailed below.

11. ENVIRONMENT MANAGEMENT

Zenith Energy recognises its activities have an environmental impact and therefore maintains an Environmental Management System (EMS), the core of which is based on an Environmental Aspects and Impacts Assessment which in turn leads to the development of controls and procedures to minimise and reduce those impacts during normal, abnormal, and emergency situations.

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12. REMEDIATION, CORRECTIVE AND PREVENTIVE ACTIONS

If any non-conformity (including Social Compliance, Environmental or OH&S) or breach is identified, whether within Zenith Energy or the supply chain, remediation or other corrective action will be taken. All such non-conformity will be recorded within the management system and root cause analysis completed where appropriate to establish any corrective or preventive actions. However, in all cases timely corrective action will be taken to prevent further non-conformity and/or reduce the impact of that non-conformity. In the cases of a breach relating to the Code of Conduct including within the supply chain, actions may include:

- Remediation, providing guidance to the supplier in how best to resolve the matter with a positive outcome for those who may be affected. For child labour breaches this must include establishment of schooling where the child is of compulsory school age. We will seek to achieve acceptable performance and compliance of the supplier.
- Where acceptable performance and compliance cannot be achieved or where the risk and impact on affected people is too great because of the breach, we may decide to cease using that supplier until such time as they achieve compliance to the Code of Conduct.
- Employees within Zenith Energy may be subject to guidance and refresher training. Where there is a clear conduct issue, the issue may be managed through the company disciplinary and performance procedures.
- In all instances, further monitoring will be implemented to ensure the effectiveness of actions taken.
- Where appropriate the appropriate authorities may be informed of breaches in legislation.

The Managing Director is ultimately responsible for ensuring implementation of this policy including corrective & preventive actions.


13. PERFORMANCE AND EVALUATION

To promote continual improvement, Zenith Energy will, as part of its management systems, establish objectives and targets in respect of social compliance, environmental and OH&S performance. Objectives will be set as and when opportunities are identified and at management review. A plan for the achievement of objectives will be established and review of the extent to which they have been achieved also monitored.

As appropriate monitoring of key performance indicators will also be established which may include:

- Non-conformities relative to the Code of Conduct
- Health & Safety incidents including ‘accidents.
- Resource use (e.g. energy)
- Supply chain performance.

Additionally, a Management Review will be conducted annually to review performance of the management systems including Social Compliance, Policies, non-conformity, and opportunities for improvement including on the Code of Conduct.

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