



Conflict of Interest

Employees should not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between their personal interests and the interests of Somerton Energy (ie conflict of interests). Such circumstances could compromise or appear to compromise the employee's ability to make impartial business decisions. If in any doubt, the rule should be to disclose an issue to your supervisor to ensure that the issue can be adequately considered.

In particular:

- Neither employees nor their immediate family members should have interests or investments in a competitor, customer, partner, or supplier of Somerton Energy that would create a conflict of interest. Conflicts of interest would not usually arise out of merely holding shares in such a company. However, conflicts would arise, if for example, an employee had shares in a family company that was a supplier to Somerton Energy and the employee was able to influence decision making regarding the award of contracts to that company.
- Similarly, employees should not hold positions in, or have relationships with, outside organisations that have business dealings with Somerton Energy if the employee's position in the Company allows them to influence these transactions.
- Other than in exceptional circumstances where particular arrangements may be authorised, no employee should be in a position of influence regarding the employment conditions (eg work assignment, compensation, etc) or performance assessment of a family member.
- Employees should not take additional employment with outside organisations or operate their own business if such employment or activity will create an actual or perceived conflict of interest (eg employment with a competitor, customer or supplier).