Fraud and Corruption Policy

1. Purpose

1.1 The purpose of this policy is to protect the assets and reputation of MeOH Energy (the Company) by:

- reinforcing the commitment and responsibility of the board of directors of the Company (Board) and MeOH Energy's senior management to identify fraudulent and corrupt activities and for establishing policies, controls and procedures for prevention and detection of these activities;
- reinforcing the requirement for all MeOH Energy employees and others to refrain from corrupt and fraudulent conduct and encourage the reporting of any instance of fraud or corrupt conduct;
- providing a framework for conduct of investigations to ensure that all suspected fraudulent and corrupt activity is dealt with appropriately; and
- assigning responsibility for the development of controls to prevent and detect fraud.

2. Scope

2.1 This policy applies to all officers, employees (including directors, executives and managers) and contractors of the Company and its subsidiary companies.

2.2 Any irregularity or suspected irregularity involving a shareholder, vendor, consultants or any other third- party agencies doing business with the Company or its officers, employees or contractors, is included in the scope of this policy.

2.3 This policy does not have regard to the officer's, employee's or contractor's length of service, title or relationship to the Company.

2.4 This policy does not limit any rights or obligations which the Company's officers, employees or contractors have at law.

3. Definition of Fraud and Corruption

Corruption is defined (for the purposes of this policy) as a dishonest activity in which a director, officer, executive, manager, employee or contractor of an entity acts in a manner that is contrary to the interests of the company and abuses his / her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.

Examples of corrupt conduct include, but are not limited to:

3.1 Corruption is defined (for the purposes of this policy) as a dishonest activity in which a director, officer, executive, manager, employee or contractor of an entity acts in a manner that is contrary to the interests of the company and abuses his / her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.

3.2 Examples of corrupt conduct include, but are not limited to:

- payment of secret commissions (bribes, facilitation payments or gratuities) in money, or some other value, to other businesses, individuals or public officials;
- receipt of bribes or gratuities from other businesses, individuals or public officials;
- release of confidential information, for other than a proper business purpose, sometimes in exchange for either a financial or non-financial advantage;
- an officer, employee or contractor of the company manipulating a tendering process to achieve a desired outcome; or
- a conflict of interest involving an officer, employee or contractor of the company acting in his or her own self-interest rather than in the interests of the company.

3.3 Fraud is defined as an intentional act by one or more individuals among management, those charged with governance, officers, employees, contractors or other third parties, involving the use of deception to obtain an unjust or illegal advantage.

3.4 A fraud can typically result in actual or potential financial loss to any person or entity however this is not always the case.

3.5 Examples of fraud could include, but are not limited to:

- misappropriation of funds, securities, inventories, supplies or other assets including use of assets for unauthorised private purposes;
- causing a loss to the Company or creating a liability for the company by deception;
- impropriety in the handling or reporting of money or financial records;
- profiting from insider knowledge of the Company's activities or intended activities;
- accepting or seeking anything of value from contractors, vendors or persons providing services or goods to the Company;
- false invoicing for goods or services never rendered or backdating agreements;
- submission of exaggerated or wholly fictitious accident, harassment or injury claims; or
- misuse of personal/sick leave entitlements.

4. Policy

4.1 The Company requires all officers, employees and contractors at all times to act honestly and with integrity and to safeguard the Company resources for which they are responsible. The Company is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits. Any fraud or corruption committed against the Company is a major concern and as a consequence all identified instances will be thoroughly investigated and appropriate disciplinary action will be taken against any officer, employee or contractor of the Company.

4.2 The Company requires all officers, employees and contractors at all times to act honestly and with integrity and to safeguard the Company resources for which they are responsible.

4.3 The Company is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

4.4 Any fraud or corruption committed against the Company is a major concern and as a consequence, all identified instances will be thoroughly investigated and appropriate disciplinary action will be taken against any officer, employee or contractor of the Company who is found guilty of corrupt or fraudulent conduct. This may include referral to the appropriate law enforcement or regulatory agencies for independent investigation.

5. Code of Conduct

5.1 The Company's Code of Conduct assists in preventing fraud and corruption within the Company and it specifically requires that employees comply with the code at all times.

6. Fraud and Corruption Control

Board and Senior Management Responsibility

6.1 The Company's Board and senior management are ultimately responsible for setting the tone at the top and have a responsibility to:

- ensure that there is an effective fraud and corruption risk management framework in place;
- understand the fraud and corruption risks to which the Company is exposed;
- maintain oversight of the fraud risk assessment and the controls in place to mitigate the risks identified; and
- monitor reports on fraud risks, policies and control activities that include obtaining assurance that the controls are effective.

Divisional/Functional Management Responsibilities

6.2 All divisional/functional managers of the Company are responsible for:

- fostering an environment and culture within their businesses that makes active fraud and corruption control a responsibility of all officers, employees and contractors;
- implementing standards and procedures as required by the Board to encourage the deterrence of fraud and corruption; and
- the initial detection and reporting of offences should they occur.

6.3 All officers, employees and contractors are responsible for complying with Company policies and procedures, including its codes of conduct, and maintaining vigilance in early detection, reporting and prevention of fraud and corruption.

6.4 Managers are responsible for:

- communicating and raising awareness of the risks relating to fraud and corruption with their employees and for ensuring compliance with Company policies and procedures, adequate rotation of employees where appropriate, and ensuring that sufficient levels of staffing are in place; and
- implementing and maintaining adequate internal controls that provide for the security

and accountability of Company resources and prevent / reduce the opportunity for fraud and corruption to occur.

Audit & Risk Management Committee

6.5 The Company's Audit & Risk Management Committee (ARC) (with the support of the external auditors) has the primary responsibility for:

- investigating internal and external fraud and corruption matters, including using external parties where required and notifying law enforcement or regulatory agencies as necessary;
- conducting an annual fraud and corruption risk assessment via workshops with the businesses to assess the adequacy and effectiveness of the Company's fraud risk management processes;
- ensuring that the risk of fraud and corruption is being appropriately managed and controlled by business functions / divisions;
- analysing loss trends arising from fraud; and
- overseeing the implementation and maintenance of best practice techniques and controls to prevent and detect fraud and corruption.

External Auditors

6.6 The external auditors will be instructed as part of their audit activity to:

- assess the adequacy and effectiveness of the Company's fraud and corruption risk management processes, in line with the Company's risk management policies;
- support the ARC with any investigation of any suspected fraud or corrupt activity; and
- deliver asset audits as part of their substantive audit testing with a focus on protecting and substantiating Company assets, with the main focus of this aspect of their audits being on payment and invoicing systems, physical security and other asset and customer level processes.

6.7 Additionally, any specific fraud risks (with high or moderate risk rating) flagged by the ARC may form part of the annual external audit program.

People & Culture

6.8 The Company's People & Culture team, if any, and absent that role, the CEO, is responsible for ensuring that adequate procedures are in place that address:

- appropriate security screening and selection of officers and employees;
- disciplinary / dismissal procedures;
- employment contracts that include relevant conditions of employment relating to fraudulent and corrupt conduct;
- monitoring of annual leave entitlements to ensure that officers, employees and contractors do not accumulate excessive annual leave entitlements; and

- clarification and formalisation of responsibilities / segregation of duties (where possible, these should be included in relevant position descriptions).

6.9 The People & Culture team will also be responsible for providing training in respect of this policy that will:

- assist with the identification of fraud and corruption risks;
- provide effective fraud and corruption mitigation techniques; and
- reinforce the Company's zero tolerance policy on fraud and corruption.

Finance

6.10 The Company's Chief Financial Officer (CFO) is responsible for making recommendations regarding the placement and maintenance of insurance coverage for crime, fraud and fidelity risk for the Company.

6.11 The Company's Finance team is responsible for implementing robust processes and controls in relation to expenditure, investments and monetary transactions. They will also ensure that provisions and write offs in relation to any detected fraud are made in accordance with the Company's group accounting policies and procedures.

Investigations

6.12 The Company Secretary will provide advice and requisite management assistance regarding any prospective investigation or litigation linked to a fraud or corruption event.

7. Investigation Protocols

7.1 If an investigation identifies that fraud or corruption has occurred, management will escalate the matter in accordance with section 8 below.

7.2 Decisions to prosecute or refer the examination results to the appropriate law enforcement or regulatory agency will be made bby the Board following receipt of recommendations from the Company's Chief Executive Officer (CEO) and the ARC.

7.3 In the event of an investigation, members of the investigating team will have free and unrestricted access to all of the Company's records and premises. They will have the authority to examine and copy any information for the specific purpose of the investigation.

8. Reporting

8.1 Any officer, employee or contractor who suspects fraud or corrupt activity has the ability to report the matter confidentially through one of the following options:

- notifying the Head of People & Culture;
- notifying the CEO or CFO; or
- directly notifying the Company's ARC.

8.2 It is the responsibility of all officers, employees and contractors to report all suspected, attempted or actual fraud or corruption incidents. All information received is treated confidentially.

8.3 Investigations will not be disclosed to, or discussed with, anyone other than those who have a legitimate need to know.

8.4 The table below outlines the escalation requirements upon receiving a report of suspected fraud or corruption.

Size and nature of report	Escalation
Any report of suspected fraud or corruption received by management	CEO / CFO / Head of People & Culture
Where the incident meets the definition of corruption (regardless of the financial impact)	The Company's Audit & Risk Management Committee
Where the incident is fraudulent in nature and the financial impact is greater than $25,000	The Company's Board

9. Policy review

9.1 At least annually the Company Secretary will initiate a review of this policy. Any proposed changes to this policy must be approved by the Board.

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