

Our Policy

Compliance with the Law

SPI (Australia) Assets Pty Ltd (**Jemena**) operates within an environment of demanding and sometimes complex, legal and regulatory obligations. Jemena is committed to conducting all its business operations and dealings in full compliance with the law and to ensuring that all Jemena personnel understand its compliance requirements.

To deliver on this commitment we will:

- establish and maintain governance structures and compliance management systems that are commensurate with the nature of the obligations and associated compliance risks; and
- foster and maintain a culture that values and supports compliance through strong leadership, participation, training and development.

Wherever we operate we will:

- identify and assess applicable obligations and develop and implement appropriate procedures and controls to ensure compliance;
- set and monitor performance against meaningful objectives and measures for compliance;
- identify and analyse breaches and possible breaches of the law, and implement appropriate responses; and
- actively engage with key compliance stakeholders to foster constructive relationships.

In pursuing our goal of full compliance with the law, we:

- adhere to Jemena's corporate values in managing compliance and in our dealings with all stakeholders;
- value and encourage behaviour that supports and produces compliant outcomes; and
- strive for continuous improvement in compliance performance.

We are all responsible for Jemena's compliance performance. In particular:

- management and supervisors will provide visible leadership and appropriate resources, and ensure that efficient and effective compliance procedures and controls are implemented in the workplace; and
- as individuals, we are all accountable and empowered to ensure we adhere to Jemena's compliance management systems and perform our duties in compliance with the law. We are also responsible for reporting any breach or possible breach of the law that comes to our attention.

We must comply with this policy and the law at all times.

It is a requirement that every Jemena director, officer, and employee, as well as contractors, advisers, and agents that act on behalf of Jemena, take all reasonable steps to avoid breaches of this policy and the law. This obligation includes taking due care to obtain advice to avoid inadvertent breaches. Where there is doubt about the appropriateness of a course of action, advice must be sought from an appropriate subject matter expert or escalated, if necessary to the relevant Leadership Team member, for consideration.

Behaviours that compromise compliance will not be tolerated.



Lim Howe Run
Acting Chief Executive Officer
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