

The Lodestone Code

Date of Last Approval: October 2026
Next Review: October 2028

Purpose

Lodestone Energy Limited ("**Lodestone**") is committed to maintaining the highest standards of honesty, integrity and ethical conduct, and we expect our people to behave in a manner that is in line with this code ("**Code**") and supports our cornerstones.

This Lodestone Code underpins everything we do - it is not an exhaustive list of acceptable or unacceptable behaviour; rather it is intended to guide decisions so they are consistent with Lodestone's cornerstones, business goals, policies, and legal obligations.

Scope

This Code applies to all Lodestone directors, employees and contractors (together "**Our People**" or "**you**", "**your**").

The Code applies in the workplace, during work activities and at work related events during and outside of normal working hours. It applies to conduct on electronic and social media, and anywhere behaviour may be connected to Lodestone.

Failure to follow this Code may result in disciplinary action, up to and including dismissal or termination of your engagement or employment with Lodestone following a fair process.

Our Expectations - The Basics

Health and Safety Commitment

The health, safety and wellbeing of Our People is of paramount importance to Lodestone. All of Our People are expected to work safely, report all hazards and incidents, and look out for each other in a manner consistent with Lodestone's policies and cornerstones.

Lodestone Standards

As part of our commitment to working safely, ethically and professionally it is important that you:

- familiarise yourself and always behave in a manner consistent with Lodestone's cornerstones, policies, procedures and expectations;
- carry out your duties in a way that reflects and strengthens Lodestone's integrity, cornerstones and reputation; and
- conduct all business activities with honesty, professionalism and a commitment to high ethical and legal standards.

Ethical and Professional Conduct

As part of the Lodestone team, Our People are expected to:

- demonstrate behaviours that reflect the standards and expectations set out in the Code, company policies, standards and in line with our cornerstones;
- act with honesty, integrity and in line with the law in everything you do;



- actively support and contribute to a diverse, inclusive, and respectful workplace culture where people feel safe, valued and able to contribute;
- contribute to a workplace free from bullying, harassment, discrimination, and inappropriate behaviour of any kind.
- work collaboratively and treat everyone with respect, dignity and professionalism;
- help maintain a safe and healthy workplace by ensuring you are fit for work and not adversely affected by drugs, alcohol, or any other substance that may impair your safety, judgment, performance, or the wellbeing of others.
- support Lodestone decisions in a professional and constructive manner and raise concerns or differing views through appropriate channels;
- act in ways that protect and enhance Lodestone's integrity and reputation;
- raise concerns, risks, or potential breaches of the Code or company policy or standard in a timely, respectful, and constructive manner;
- contribute ideas, feedback, and differing perspectives professionally to support continuous improvement and better decision-making.
- exercise care, diligence, sound judgement and your best efforts when carrying out your duties or providing services;
- maintain professional and respectful relationships with our people and third parties;
- provide only the types and levels of service that you are competent and authorised to provide;
- communicate and make commitments on behalf of Lodestone only when you are authorised and qualified to do so.
- communicate respectfully and professionally in all interactions, including online and through electronic communications.
- take accountability for your actions, decisions, and responsibilities, and address mistakes or issues when they arise in a timely manner.

Our Expectations - Managing Conflicts of Interest

Conflicts of Interest

We encourage openness and transparency in identifying and managing situations where personal or professional interests or relationships may conflict with or appear to conflict with Lodestone's interests ("**Conflicts of Interest**").

You are expected to:

- be aware of personal, financial, or professional relationships, interests, or associations that may create an actual, potential, or perceived conflict with Lodestone's interests;
- promptly disclose any actual or potential Conflict of Interest to the Managing Director, GM Legal, or GM Human Resources;
- avoid situations where your personal interests, investments, relationships, or other commitments could influence, or appear to influence, the decisions you make for Lodestone;
- not take part in any other business or outside activities (other than incidental investments which do not present any actual or potential conflict) without Lodestone's written consent which would conflict with your ability to perform your duties to Lodestone; and
- if you are unsure whether a situation could represent a Conflict of Interest you should talk to the GM Legal or GM Human Resources for guidance.

Financial Interest in Other Organisations



You must not have any direct interest, financial or otherwise, in any Lodestone suppliers, advisers, competitors and other entities engaging in business with Lodestone unless approved in writing by the Managing Director. Approval is not required for investment of up to 5% of the share value in any publicly listed companies on the Australian or New Zealand stock exchange. However, you must still comply with insider trading laws and Lodestone's Securities Trading Policy at all times.

Corporate Opportunities

You are expected to act with integrity and not take advantage of opportunities arising from your work with Lodestone for personal gain or to compete with Lodestone.

Personal Relationships

If you have a family member or a close personal relationship with someone who is an employee of or involved with a competitor, supplier, or key customer, and you or they have access to information that may influence competitive advantage, you must disclose this to the Managing Director, GM Legal or GM Human Resources. Lodestone's strategic leadership team will, working with you, assess whether there is any resulting actual or perceived conflict of interest or potential conflict of interest, and determine an appropriate course of action.

If you have a close personal relationship with another employee, and one or both of you is a member of Lodestone's strategic leadership team, you must disclose this to the Managing Director who will report this to the Board. The Managing Director will, working with you, assess whether there is any resulting actual or perceived conflict of interest or potential conflict of interest, and determine an appropriate course of action.

Entertainment, Gifts and Gratuities

We recognise that reasonable hospitality and the exchange of modest gifts can support positive and professional business relationships.

You are expected to exercise good judgment and ensure that any gift, hospitality, or gratuity offered or accepted is appropriate, transparent, and would not reasonably be perceived as influencing business decisions or creating a conflict of interest.

Occasional meals, refreshments, and invitations to sporting or social events that arise in the normal course of business relationships are generally acceptable. Where invitations include flights or accommodation, prior approval must be obtained from the Managing Director.

You should also keep your manager informed of any significant gifts, hospitality, or benefits that are offered or accepted. For transparency any entertainment, gifts or gratuities over \$200 should be reported to the GM Human Resources who will record it in the register.

Other Positions

Lodestone recognises that you may choose to hold external positions, interests, or community roles outside of your work with us.

To help manage any potential conflicts or impacts on your responsibilities, you are expected to obtain written approval from your manager before accepting any external position, including public office, that could affect your ability to perform your role at Lodestone effectively or objectively.

Our Expectations - Information and Security



Company Information

Protecting confidential information is important to maintaining the trust of our customers, communities, business partners, and each other. You are expected to access, use, and share Lodestone information responsibly and only for legitimate authorised work purposes.

Confidential information must not be used for personal benefit or disclosed to external parties unless authorised to do so. This includes customer, employee, commercial, financial, operational, and other sensitive information.

You must not access, view, amend, disclose or use any information concerning other employees, customers, business partners and other stakeholders, including your own customer account information, or that of family members, friends, or other related parties for any purpose without the permission of Lodestone and the relevant individual or organisation and for approved business activities.

All public communications, statements, or releases on behalf of Lodestone must be approved by the Managing Director, GM Legal and GM Customer & Brand.

IT and Security

Protecting our people, assets and cyber security is important for Lodestone's continued success. You are expected to use Lodestone equipment, systems, buildings, and access credentials responsibly, securely, and for authorised purposes only.

It's important you take all reasonable steps to protect Lodestone's information, devices, passwords, keys, access cards, and other assets from unauthorised access, loss, misuse, or disclosure.

You should report any suspected security incident, unauthorised access, lost device, or breach of security to your manager immediately and in accordance with the Lodestone ICT Policy.

Further information on acceptable use, cyber security, AI use, password management, and monitoring, is contained in the Lodestone ICT Policy.

Personal Confidentiality

Lodestone undertakes to ensure that as far as possible, all personal information obtained about you will be dealt with confidentially and in accordance with the provisions of the Privacy Act 2020, and will only be made known to those who require it for the effective administration of Lodestone.

If you have gained access to personal information about another one of Our People, a supplier or a customer as a result of your employment with Lodestone, you must keep that information confidential. Refer to the Lodestone Privacy policy for more information and detail regarding Privacy expectations.

Our Expectations - Looking After Our Finances

Delegated Authority

Our People are required to spend Lodestone's money wisely, using good judgment in line with the law, our policies, and the standards we set ourselves. You may only use Lodestone funds for legitimate business needs, and are responsible for following all policies and processes, including Delegated Authorities, to ensure that you have the appropriate authority before entering into contracts or committing to spend Lodestone funds.



Records and Time Keeping

Accurate and reliable records are important to maintaining trust, accountability, and effective business operations. You are expected to ensure that time records, personal records, customer records, Lodestone systems, management reports, supplier invoices, credit notes, expense claims, and other business records are completed honestly, accurately, and in a timely manner.

If you become aware of an error or inaccuracy in any record or information, you should take reasonable steps to have it corrected promptly and before it is approved or submitted.

Lodestone Assets

We all play an important role in protecting and using Lodestone assets responsibly. You are expected to act with integrity and take personal responsibility to ensure the protection and efficient use of Lodestone's corporate information, assets and property appropriately, lawfully, and for authorised business purposes, and to take reasonable care to protect them from loss, theft, damage, or misuse.

Reporting

At Lodestone we take breaches of our policies seriously so if you have concerns around general breaches of this Code or any other Lodestone policies, including accounting, auditing or internal control breaches, you should raise this with your manager or the GM Human Resources in the first instance.

Code Breach

Failure to follow this Code can put Our People and our business at risk. Although we hope it is rare, there will be times when a breach of the Code occurs. As the Code establishes base-line behaviours required of all Our People, Lodestone will view a breach of the Code seriously meaning it is likely to result in disciplinary action being taken following a fair and transparent process – depending on the seriousness of the situation, this could include action up to and including dismissal or termination of your engagement with Lodestone.

Review

This Code will be reviewed every two years.