



Kidson Energy

Code of Conduct

Purpose

As Directors of Kidson Energy Pty Ltd (LPM) we are committed to ensuring that all our operations remain transparent, ethical, and compliant in all regards, to our **Code of Conduct Policy**. We are committed to Kidson Energy being a good corporate citizen, with a culture that values high standards of ethical and socially responsible conduct and complies with all legal obligations in all operations. Everyone who works at Kidson Energy is individually responsible for compliance with this commitment in all their work practices.

Application

The Kidson Energy **Code of Conduct** describes how we put our commitment to be a good corporate citizen into practice every day and sets out the mandatory standards on how we interact with others, how we make decisions, the actions we take and the way in which we carry out our work. The Code applies to any person who performs work, or provides services, in any capacity for, or on behalf of Kidson Energy, including employees, officers and directors, contractors, consultants and subcontractors.

Kidson Energy's management is responsible for the performance of the company's operations. Corporate governance through the **Code of Conduct**, establishes a framework to provide appropriate levels of responsibility and accountability within the organisation, establishing non-regulatory compliance for actions taken by individuals carrying out their day-to-day work, at any level in the organisation.

Standards of behaviour

When representing the Company, we will abide by the following minimum standards;

- Comply with the laws and codes that govern Kidson Energy and our operations.
 - Observe the law and the code that govern the conduct of Kidson Energy's business. If you are uncertain whether a particular activity is legal or complies with the Code, consult with Kidson Energy Executives or in house Legal.
 - We respect the laws, customs, and business practices of the communities in which we operate.
- Always work safely and look out for the safety of our colleagues.
 - Understand and comply with health and safety requirements that apply to your work, including ensuring you are fit for work and comply with the Kidson Energy **Environment, Health and Safety Policy**.
 - Take all necessary steps to identify, manage and prevent workplace injuries and incidents that may affect you or your colleagues.
 - Speak up when you see unsafe work practices and stop work if you consider it unsafe.
 - Report any workplace injuries, incidents or concerns and listen to others who have a concern.
 - Ensure you are medically fit to undertake your work and that your performance is not impaired (for example, by alcohol, drugs or by lack of sleep).



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- Have a 0.00% blood alcohol level when working on any operational or construction site or when operating plant or equipment and a blood alcohol level of less than 0.05% at all other Kidson Energy sites.
- Not enter the workplace if you are under the influence of illegal drugs or drugs that may impair your ability to carry out your role.
- Not smoke in the workplace.
- Act honestly, with integrity & respect and fairness in all dealings with others and each other.
 - All employees, officers and directors, contractors, consultants, and subcontractors are responsible for acting honestly and with high standards of personal integrity.
 - All employees, officers and directors, contractors, consultants, and subcontractors will create and maintain a culture of high ethical standards and commitment to compliance.
 - Not act in a personal capacity in a manner which is liable to bring the Company or any individual into disrepute.
 - act in an appropriate respectful and business-like manner when representing Kidson Energy in external forums.
 - Employees must not make comment on matters relating to the Company in their capacity as an employee unless they are:
 - Authorised to do so by an Executive Director, or
 - Giving evidence in court, or
 - Otherwise authorised or required to by law.
 - Kidson Energy employee must deal with others in a way that is fair and will not engage in deceptive practices.
- Avoid or manage conflicts of interest, acting ethically and lawfully in all business conduct.
 - Officers and directors, employees, contractors, consultants, and subcontractors must not involve themselves in situations where there is a real or apparent conflict of interest between them as individuals and the interest of Kidson Energy.
 - Ensure that any exchange of gifts or benefits connected with work at Kidson Energy is appropriate and transparent.
 - Not make any cash donation to a political party on behalf of Kidson Energy or provide any facilitation payments or benefits that could be construed as a bribe to a government body.
 - Avoid situations in which your personal interests' conflict, may conflict, or may appear to conflict with Kidson Energy interests.
 - You must not submit or accept any bribe, or other improper inducement. Any such inducements will be reported to the Kidson energy Executive.
 - Avoid anti-competitive conduct, including sharing of market sensitive information (such as pricing, costs, contractual terms and conditions or production or marketing plans) with competitors and do not enter into agreements, or understandings with competitors to fix prices or distort the market.



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- Work in a way that respects the human rights of all people that are touched by our operations. This includes working in a manner consistent with the Kidson Energy **Modern Slavery and Ethical Sourcing Policy**.
 - Maintain the confidentiality of Kidson Energy information to which you have access. This means ensuring information is only used for authorised purposes and is not shared with other Kidson Energy Workers or external parties who do not have a legitimate need for that information.
- Use Kidson Energy assets properly and efficiently.
- Always utilise company resources for a valid and authorised business purpose, ensure proper and responsible expenditure of Kidson Energy funds, and use Kidson Energy physical and intellectual property for its intended purpose.
 - Employees authorised to use Company resources outside of core business times must take responsibility for maintaining, replacing, and safeguarding the property and following any special directions or conditions that apply.
- Ensure that our workplace is free from harassment, discrimination, and bullying.
- Treat all staff, contractors, consultants, and applicants fairly and equitably in all matters according to skills, qualifications, abilities, and achievements.
 - Kidson Energy will be inclusive and do not discriminate, including in relation to gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age, or political opinion.
 - Treat everybody with respect. Offensive messages, derogatory remarks and inappropriate jokes are never acceptable and can be unlawful. This obligation extends to all interactions – including social media.
- Communicate accurately and honestly with investors, government, and the community.
- Kidson Energy will always strive to communicate in a clear, concise, factual, and balanced manner.
 - Kidson Energy will respond to all investor queries promptly while ensuring that selective or inadvertent disclosure of material information does not occur.
- Contribute to the wellbeing of stakeholders and understand and manage the impact of our operations on the environment.
- Kidson Energy strives to make positive and sustainable economic, social, and environmental contributions to the communities in which we operate.
 - Understand and comply with environmental requirements that apply to your work, including the Kidson Energy **Environment, Health and Safety Policy** and aspects of other Kidson Energy Policies that apply to the environment and sustainability.
 - Recognise and respect the rights and cultures of communities in which Kidson Energy operates, including all indigenous communities.



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- Be an exemplary corporate citizen.
 - Lay solid foundations for management and oversight. Recognise and publish the respective roles and responsibilities of board and management.
 - Structure the board to add value. Have a board of an effective composition, size, and commitment to adequately discharge its responsibilities and duties.
 - Promote ethical and responsible behaviour and decision-making.
 - Safeguard integrity in financial reporting. Have a structure to independently verify and safeguard the integrity of the company's financial reporting.
 - Make timely and balanced disclosure of all material matters concerning the company.
 - Recognise and manage risk through a sound system of risk oversight and management and internal control.
 - Encourage enhanced performance. Fairly review and actively encourage enhanced board and management effectiveness.
 - Remunerate fairly and responsibly. Ensure that the level and composition of remuneration is sufficient and reasonable and that its relationship to corporate and individual performance is defined.
 - All breaches of the code must be reported (suspected or actual contravention), including fraud, theft, or corruption.
- Everyone at Kidson Energy is expected to understand and comply with the standards in this Code.
 - Employees should note that breaches of certain sections of this Code of Conduct may be punishable under legislation. Any material breaches of the Code of Conduct will be reported to the Executive and may lead to disciplinary action up to and including dismissal.
- Report any matters of Concern.
 - Employees are encouraged to raise any matters of concern in good faith with management or with the Executive, without fear of retribution.

This policy will be reviewed at appropriate intervals and revised when necessary to keep it current. It can only be amended by resolution of the Directors.

Andrew Somoff
Director

Johnathon Goyder
Director