

Supplier Code of Conduct

This policy is dated March 2025

1. INTRODUCTION

At Lochard Energy (**Lochard**), we are committed to conducting our business with honesty, integrity, in accordance with high legal and ethical standards, and with respect for each other and with those with whom we do business.

This Supplier Code of Conduct sets out the minimum standards Lochard requires of any entity that supplies goods or services to Lochard (**Suppliers**).

Suppliers are expected to be aware of and understand this Supplier Code of Conduct, communicate it to those who need to know within their organisations, and ensure that its business and supply chain meet these minimum standards.

Lochard may amend or update this Supplier Code of Conduct at any time. The most recent version of this document will be publicly available on Lochard's website (www.lochardenergy.com.au).

2. BUSINESS PRACTICES & GOOD CORPORATE GOVERNANCE

Lochard expects its Suppliers to:

- (a) conduct their business operations according to the laws and regulations that operate in the places in which they do business and in accordance with principles of good corporate governance;
- (b) not engage in any form of corruption, extortion, fraud, bribery or facilitation payments;
- (c) not offer or receive any inducement to doing business or to do something dishonest or illegal;
- (d) treat its own suppliers fairly and ethically; and
- (e) avoid any actual, potential or perceived conflict of interests in its dealings with Lochard, including financial interests, and advise Lochard of any actual, potential or perceived conflict of interest.

Lochard has a Whistleblowing Policy (available at www.lochardenergy.com.au) and encourages eligible whistleblowers, which includes Suppliers, to raise any relevant concerns under that policy.

3. WORKPLACE HEALTH & SAFETY

At Lochard, we hold safety as the number one priority in all that we do.

Lochard is committed to providing a safe working environment for all personnel at its workplaces and believes that everyone is responsible for helping to make a safe workplace. We endeavour to eliminate workplace injuries and illnesses through proactive and systematic management of risk.

Lochard's commitment to health and safety relies on our Suppliers also being diligent about safety and cooperating with us. Lochard expects its Suppliers to:

- (a) provide a healthy and safe workplace for its personnel;
- (b) comply with all applicable laws relating to workplace health and safety and establish robust occupational health and safety management rules, consistent with regulations and good industry practice;
- (c) comply with Lochard's Health, Safety, Sustainability & Environment Policy (available at www.lochardenergy.com.au) and HSE systems, standards and procedures when working on Lochard sites; and
- (d) provide training and ensure that its personnel are adequately educated and resourced in workplace health and safety matters.

4. ENVIRONMENT & SUSTAINABILITY

Lochard is committed to the principles of sustainable development and environmental stewardship.

Lochard expects its Suppliers to demonstrate their commitment to minimising the impact on the environment and managing climate risk by:

- (a) complying with the standards of environmental protection required under applicable laws;
- (b) managing and seeking to minimise pollution in its business and operations, consistent with good industry practice; and
- (c) complying with Lochard's Health, Safety, Sustainability & Environment Policy (available at www.lochardenergy.com.au).

5. COMMUNITY

Lochard is committed to respecting and engaging with the community in which our business operates. We expect our Suppliers to be polite and respectful towards both Lochard personnel and Lochard's neighbours and local community.

Wherever appropriate, Lochard sources products and services from local suppliers and we encourage our Suppliers to do the same.

6. CYBERSECURITY

As an operator of critical energy infrastructure, Lochard places high importance on cybersecurity protection and we expect our Suppliers to support us in this endeavour. Suppliers must:

- (a) support Lochard to comply with the *Security of Critical Infrastructure Act 2018* (Cth) (which requires relevant entities to report cyber incidents) by notifying Lochard

- immediately of any cyber related disruptions or breaches and otherwise assist Lochard in relation to information technology (**IT**) and cybersecurity matters;
- (b) work with Lochard to protect Lochard's IT systems and information and business processes from cyber related disruptions or breaches; and
- (c) implement appropriate technical solutions and security measures to protect Lochard's data and information and help protect Lochard from cyber breaches and unauthorised IT access.

7. PRIVACY, CONFIDENTIALITY & INTELLECTUAL PROPERTY

Lochard is committed to complying with laws relating to the protection of people's privacy and values the confidentiality of business information.

Lochard has a Privacy Policy (available at www.lochardenergy.com.au) and expects its Suppliers to comply with privacy laws. We also expect Suppliers to comply with the confidentiality provisions in the Supplier's agreements with Lochard.

Suppliers must also:

- (a) comply with all applicable laws relating to intellectual property (**IP**) rights; and
- (b) protect and respect the IP rights of Lochard, including not using Lochard's IP without our prior written approval.

8. LABOUR & HUMAN RIGHTS

Lochard believes that all workers in its supply chain, whether in Australia or other countries, deserve to be treated with dignity and respect. Suppliers must:

- (a) comply with the *Modern Slavery Act 2018* (Cth) and relevant regulations and codes (which require certain entities to report on the risks of modern slavery in their operations and supply chains and their actions to address those risks), if applicable to their business, and support Lochard to comply with its obligations;
- (b) not use, or facilitate the use of, forced labour, human trafficking, deceptive recruiting for labour or services, or other acts of modern slavery;
- (c) honour the right to reasonable compensation and guarantee applicable national statutory minimum wages;
- (d) uphold equal opportunities for, and treatment of, its employees irrespective of nationality, race, disability, age, gender and other attributes protected by law; and
- (e) not tolerate unacceptable treatment of its personnel, such as physical or psychological abuse, harassment or discrimination.

9. SUPPLIER GOVERNANCE & REPORTING

Lochard expects its Suppliers to monitor their compliance (and that of their supply chains) with this Supplier Code of Conduct. If a Supplier becomes aware of an issue, the matter should be reported to Lochard as soon as possible and action may need to be taken by the Supplier and/or Lochard to remedy the issue.

Questions or Further Information

Any questions in relation to this Supplier Code of Conduct should be directed to Lochard's Contracts & Procurement Manager (david.nelson@lochardenergy.com.au)