CODE OF CONDUCT

CORPORATE GOVERNANCE CODE

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1 Purpose

At Boss Energy Limited (**Company**), we are committed to conducting business in an ethical, responsible, and sustainable manner. This Code of Conduct (**Our Code**) outlines the principles and expectations that guide our operations, decisions, and behaviours both within the company and in our interactions with stakeholders.

The Code is designed to provide clear information on how we are expected to behave in the workplace and how we should treat others. The Code does not replace any of our existing policies, standards or procedures – it simply underpins them and acts as a point of reference for getting familiar with their basic principles.

2 Who does this Code apply to?

Our Code applies to the Board of directors, executive leadership team, employees, and contractors acting on behalf of the Company (collectively, our **People**). The Company expects all business partners, including suppliers, customers, partners, service providers, and other stakeholders, to adhere to the principles outlined in Our Code.

Everyone representing or acting on behalf of the Company is responsible for ensuring that their behaviour and actions align with the values and principles in Our Code. Our People are expected to uphold the highest ethical conduct and comply with Our Code in their day-to-day activities.

We encourage you to consult Our Code often and incorporate its principles into your work.

3 Training

All Company employees are expected to participate in annual compulsory training on Our Code which will include all information on the behaviours we expect of everyone who works for the Company and many of the standards and procedures that are referred to in Our Code.

4 Acting lawfully, ethically and responsibly

When working for the Company, all our People are required to comply with the applicable laws, regulations, industry standards, and directives in every jurisdiction in which we operate.

Ignorance of the law is never an excuse, and in the absence of legal advice or knowledge, we expect our People to conduct themselves in a professional manner and act with integrity and objectivity, striving at all times to enhance the Company's reputation and performance.

5 Our Values

Teamwork means we value and actively promote collaboration, recognising that the best results come from combining our diverse talents, skills, and experiences. We believe in supporting one another, communicating openly, and resolving differences constructively to achieve collective success.

Integrity means we hold ourselves accountable to the highest standards of ethical behaviour. We are honest in our communication, consistent in our actions, and transparent in our decisions. We build trust with colleagues, clients, and partners by doing what is right—not what is easy.

Respect means we recognise the worth of every person, regardless of their role, background, or beliefs. We listen actively, communicate thoughtfully, and create an inclusive environment where everyone feels heard and valued. We resolve differences with empathy and foster a culture where mutual regard is a foundation for collaboration and growth.

6 Our People

6.1 Being inclusive and acting with respect

The Company is committed to providing a safe, respectful, inclusive and flexible workplace environment that is free from all forms of harassment, including sexual harassment and bullying. We do not tolerate or condone any form of harassment, sexual harassment or bullying in the workplace.

Harassment of any kind, including verbal, physical, sexual or psychological is not acceptable and will be dealt with immediately. This includes unwelcome advances, offensive jokes, derogatory comments, intimidation or any other behaviour that creates a hostile work environment.

The Company is committed to always providing a safe and inclusive workplace, where others are treated with respect. Each of us is responsible for fostering and ensuring that we create this environment, and to report instances of harassment immediately.

Learn more
Whistleblower Policy and Corporate Standard, Issue Resolution Procedure, Harassment and Bullying Policy

6.2 A safe and healthy workplace

The Company will provide safe and healthy working conditions, develop, maintain and promote safe and productive work practices in all aspects of its business, and comply with all workplace health and safety laws and regulations governing its activities.

The Company considers the safety and health of its employees to be of utmost importance in the efficient conduct of its business and believes that all our People have a duty to take responsibility for their own actions and work as team to achieve a workplace in which hazards are appropriately managed. This includes ensuring that you are fit for work every day by not being under the influence of drugs, alcohol or fatigue.

Learn More
Fatigue management procedure, Fitness for Work Policy, Health and Hygiene Policy, Health and Safety Policy

7 Our Communities and Environment

7.1 Respecting Human Rights

The Company supports the Universal Declaration of Human Rights, and we will make every effort in our daily operations to protect, uphold and respect Human Rights principles. Respect for Human Rights must be integral to our decision-making processes, and our People are expected to support and promote a workplace that respects human rights and is without discrimination and harassment.

7.2 Being environmentally responsible

The Company is committed to responsible environmental management. We endeavour to be proactively green and sustainable both in the commodities we seek to develop and how we develop them.

We encourage all our People to be environmentally aware, to understand the potential environmental risks and impacts of our work and to minimize these impacts through responsible management.

Learn more
Environmental Policy

8 Our Relationships

8.1 Avoiding conflicts of interest

A conflict of interest exists when an employee's personal interests are inconsistent with those of the Company and create conflicting loyalties. Our People must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.

Our People must avoid acquiring any interests or participating in any activities that would tend to:

a. create an obligation or distraction which would affect their judgement or ability to act solely in the Company's best interests; or

b. deprive the Company of the time or attention required to perform their duties properly.

Ownership or an ownership interest in a competing or complementary business might create or appear to create a conflict. Our people must disclose to their manager, in writing, all business, commercial or financial interests or activities where their activities might reasonably be regarded as creating an actual or potential conflict with their duties of employment.

8.2 Preventing bribery, fraud and corruption

The Company is committed to conducting our business in an honest and ethical manner. We take a zero-tolerance approach to any fraudulent activities, bribery, and corrupt practices. Our People must always uphold ethical conduct through acting professionally, fairly and with integrity in all our business dealings and relationships.

It is the responsibility of our People to ensure that bribery and corruption is prevented, detected and reported.

Employees of the Company must abide by the anti-fraud and anti-corruption laws and regulations in the areas in which they operate.

Learn more
Anti Bribery & Anti-Corruption Policy

8.3 Gifts, entertainment and hospitality

Gifts and entertainment can, when excessive, be seen as a bribe and/or a conflict of interest. Care should be exercised when giving or receiving any form of gift on behalf of the Company.

Our People must only give or accept appropriate gifts, entertainment and hospitality (which includes meals) which have a lawful and legitimate business purpose.

9 Business Integrity

9.1 Responsible communications and market disclosure

As a publicly listed ASX company, the Company is required to provide timely, accurate, consistent, complete and fair disclosures about the Company and its performance.

Like many businesses, the Company authorises and trains key senior people to speak or release statements on behalf of the Company. Therefore, you may only make public statements or speak on behalf of the Company where you have been given express authorisation to do so.

When using social media, we expect you to uphold Our Code and values. It is important that you don’t comment on or disclose confidential information obtained through the course of your work, or post anything that may damage the Company’s reputation and commercial interests or brings the Company into disrepute.

9.2 Confidentiality and intellectual property

Unless publicly available, Company records, reports, papers, processes, plans and methods are proprietary and confidential. Our People may not reveal information concerning such matters without proper authorisation.

Intellectual property developed or acquired by the Company including trade secrets and other technical, financial and Company information, is an asset that must be kept confidential and protected against theft, loss or misuse.

9.3 Trading in shares

While working for the Company, our People may learn confidential and non-public information about the Company or related companies. Our People should never deal in the securities (including shares) of the Company or other listed companies if you have inside information in relation to the Company. This is called Insider Trading which is illegal and subject to criminal penalties.

In addition, material non-public information about the Company should not be shared with others.

Learn more
Security Trading Policy

9.4 Protecting company assets and information systems

The Company assets and systems remain the property of the Company and must only be used in accordance with procedures designed to protect the integrity and security of those systems and associated data. Use of the internet must be appropriate and professional, and sensitive information must never be shared with anyone not authorised to have access to it. This includes all forms of data and information.

Learn More
IT Acceptable use Corporate Standard

10 Code Amendments

The Board of Directors will review Our Code annually to ensure that it is operating effectively and assess any changes that may be required.

11 Raising Concerns

Delivering on the commitment and spirit of Our Code requires us to have a culture in which it is acceptable to speak up and raise concerns about behaviours that do not align with Our Code.

Our Whistleblower Policy and Corporate Standard is available on the Company website and the Boss document register and provides detailed information on how we will deal with any concerns. It also outlines how we protect and support those who speak up and those who are the subject of a speak up report, as well as the legal protections that apply to any individuals who speak up in Australia.

You are encouraged to speak up about any misconduct, anything that you believe to be illegal, unethical or improper, or any breach of Our Code.

The company will take these concerns seriously, act professionally when our behaviour is challenged and take a strong stance on any proven wrongdoing or breaches of Our Code. Similarly, we will not tolerate retaliation against anyone for raising a concern and speaking up.

12 Breach of this Code

A breach of our Code may carry significant reputational, commercial, operational, and/or legal ramifications for the company and individuals involved. Breaches of this code may result in disciplinary action up to and including dismissal or immediate termination. Dependent on the severity of the matter, it may result in disciplinary action for individuals, including termination of employment and/or legal action.

13 Contact details

If you have any questions, concerns or feedback about Our Code, you should contact the Chief People Officer at: Boss Energy Ltd, PO Box 70, Subiaco, WA 6008.

Phone: (08) 6263 4494

Email: boss@bossenergy.com, Attention: The Chief People Officer

Learn more – all the policies, standards and procedures mentioned in our Code are available on the Boss Document Register and/or the Company website