



VINTAGE ENERGY

Code of conduct

Vintage Energy Ltd ACN 609 200 580
(Company)

Code of conduct

1. Introduction

This Code of Conduct (**Code**) applies to and guides the directors, officers, management and employees of Vintage Energy Ltd (ACN 609 200 580) (**Company**) and any other persons who act on behalf of the Company, to carry out their duties reflecting the high ethical standards, understanding, respect and legal responsibilities set by the Company and jurisdictions in which we work.

Vintage is committed to appropriately balance, protect and enhance the interests of all stakeholders. This Code sets the standards of behaviour that apply to every aspect of Vintage's dealings and relationships both inside and outside of the Company. All personnel covered by this Code will take responsibility for conducting themselves in accordance with the Code in the context of their role in or with Vintage. The reputation and integrity of Vintage will only be maintained if this commitment is made by all those covered by this Code.

The Code has been endorsed by the Vintage Board of Directors. It refers to and is supplemented by other policies, standards and procedures adopted by Vintage to guide Vintage and its people to meet the appropriate standards set by the Company.

2. Workplace Health and Safety

The health, safety and well-being of our people are of the utmost importance and Vintage is committed to a workplace where everyone returns home without injury or illness. Vintage and its people must:

- (a) Understand and comply with all workplace health and safety regulations and requirements.
- (b) Ensure you are medically fit for attendance at work.
- (c) Comply with Vintage's **HSE Policy**.
- (d) Seek to promote a culture of safe work practice and report any injuries or concerns and listen to those who have a concern.
- (e) Speak-up when encountering an unsafe work practice and stop work when you consider it unsafe.

3. Ethical and Lawful Conduct

Vintage will observe and comply with the laws and regulations in each of the jurisdictions in which we operate and conduct business. Vintage and its people will:

- (a) Observe the highest standards of honesty, integrity and ethical and law-abiding behaviour when:
 - (i) performing their duties; and
 - (ii) dealing with any officer, employee, shareholder, customer, supplier, community representative, auditor, lawyer, other adviser of the Company and all other stakeholders.
- (b) Foster a culture of honesty, integrity and ethical and law-abiding behaviour among other officers and employees.
- (c) Avoid or disclose and manage conflicts of interest.
- (d) If unsure, ask for clarification and assistance about the application and interpretation of any law or regulation.
- (e) Regularly update their knowledge of the law as it applies to their role at Vintage.

4. Employment Practices

Vintage is committed to an honest, ethical, inclusive, diverse and non-discriminatory workplace and will apply the same approach to all its activities. Vintage and its people must:

- (a) Treat every person with care and respect.
- (b) Be inclusive and not discriminate.
- (c) Comply with Vintage's **Diversity Policy**.
- (d) Remember these obligations extend to all interactions, including social media.

5. Use of Vintage's Assets

Personnel must use Company property, time and resources in a responsible and authorised way. Vintage and its people must:

- (a) Use assets properly, safely and efficiently for the benefit of the Company.
- (b) Treat physical property with due care and do not remove unless authorised to do so.
- (c) Be responsible for proper expenditure of the Company's funds.

6. Community and Stakeholder Engagement

The Company will build and maintain our relationships with all stakeholders and communities in which we work, based on mutual trust and respect. Vintage and its people will;

- (a) Seek to build lasting relationships based on trust and respect.
- (b) Listen to stakeholders and communities and carry out what we say we will do.
- (c) Consider their economic, environmental, community and working interests.
- (d) Recognise and respect the rights, religion and culture of communities in which Vintage operates.
- (e) Respect the heritage, sites and objects of communities where we operate and conduct business.

7. Environment

Vintage will seek to make positive and sustainable economic, social and environmental contributions to communities and regions in which we operate: Vintage and its people must:

- (a) Understand and comply with all environmental requirements applicable to our work, including the Vintage **HSE Policy** and environmental and cultural heritage regulations.
- (b) Minimise the environmental impact of our operations.

8. Confidentiality and Privacy

Vintage acknowledges and values the importance of confidential and private information. The Company will protect such information and comply with all applicable laws. When working with confidential and private information, Vintage and its people must:

- (a) Ensure that any confidential material, including papers, files or media are safeguarded, stored securely and only accessed by authorised personnel.
- (b) Not disclose confidential or private information to a third party except where that disclosure is required by law or a regulatory body (including a relevant stock exchange).
- (c) Comply with relevant clauses of their Vintage employment agreement and contractual or legal agreements with third parties.

9. Communications

Vintage will communicate with our shareholders and stakeholders in a timely and accurate manner. The Company will be open and accountable and aim to ensure that information in the market is consistent, complete and provides a true and fair view. Only authorised Vintage representatives may talk to media, members of the investment community or government, or make public comment on Vintage matters. Vintage and its people must:

- (a) Comply with the Vintage **Shareholder Communications Policy**.
- (b) Advise a senior executive, Company Secretary, or the Managing Director if new information is believed to be price sensitive to Vintage securities and may require disclosure.
- (c) Encourage stakeholders to interact with us and seek to make our communications as clear as possible.
- (d) Not take unfair advantage of any officer, employee, customer, supplier, competitor, auditor, lawyer or other adviser of the Company through illegal conduct or misrepresentation of material facts.

10. Insider Trading

Vintage personnel may become aware of information about Vintage that is not publicly available and likely to influence investment in the Company. Insider trading is illegal and can lead to criminal prosecution. Vintage personnel must:

- (a) Not engage in insider trading and only trade securities in accordance with the Vintage **Securities Trading Policy**.

11. Bribery and corruption

Vintage and its people must not engage in any activity that involves, bribery, the payment of secret commissions or other improper or unlawful inducements, either on behalf of Vintage or by others wishing to do business with Vintage. The exercise of improper influence or attempting to gain an improper advantage is strictly prohibited.

12. Compliance with code and reporting of breach

Vintage will hold its people accountable to this Code of Conduct and the supporting documents. The Company will also seek to positively influence external stakeholder behaviour consistent with the standards of this Code. Compliance with this Code requires the co-operation and genuine commitment of all Vintage personnel. Employees must:

- (a) Report promptly and in good faith any actual or suspected violation of the standards, requirements or expectations set out in this code of conduct.
- (b) Encourage other employees and stakeholders to adhere to this Code and report any breaches.
- (c) Read the Vintage **Whistleblower Policy** and report any breaches in accordance with this policy.
- (d) Contact the Company Secretary if they have any questions or issues regarding this Code or Vintage's policies and procedures.