



Energy One Group Code of Conduct

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Energy One Group

www.energyone.com

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1 Code of Conduct

The Energy One Group is committed to achieving performance and results to provide value to our shareholders, while considering the interests of employees, customers, the community and others with whom we do business. In striving for outstanding performance and results, we should not compromise our ethics or principles. The Energy One Group places great importance on honesty, integrity, respect and trust.

1.1 Code of Conduct Scope

This Code applies to all directors, officers and employees of the Energy One Group. Relevant provisions also apply to contractors, subcontractors, consultants, agency workers, vendors, service providers, agents, visitors and guests while undertaking work for, representing, supplying services to, or attending an Energy One Group workplace. In this Code, these individuals are collectively referred to as “our people”, unless the context requires otherwise. Obligations concerning confidentiality, privacy, intellectual property, company information and company property continue after employment or engagement ends to the extent required by law, contract or applicable policy. This Code does not form part of any contract of employment or contract for services.

1.2 Code of Conduct Framework

The Code of Conduct sets standards for the way we work at The Energy One Group. The Code provides a practical set of guiding principles to help our directors, employees and contractors make decisions in their day-to-day work. The Code is supported by a number of more detailed policies that form part of the Energy One Group Policy Framework. These policies are referred to in this document and are located on the Energy One Group Intranet. The Energy One Group takes the Code of Conduct and all the related policies seriously. As someone working with Energy One, you are required to comply with the principles of the Code and the Energy One Group Policy Framework which are further explained below.

2 Code of Conduct Principles

Corporate Reputation	We act in The Energy One Group’s best interests and value The Energy One Group’s reputation in the marketplace.
Honesty and Integrity	We act with honesty and integrity with respect for the interests of our stakeholders both internal and external.
Respect for Others	We treat others with respect, value difference and maintain a safe working environment.
Conflicts of Interest	We identify conflicts of interest and manage them responsibly.
Personal Benefits	We do not make or receive improper payments, benefits or gains.
Privacy and Confidentiality	We respect and maintain privacy and confidentiality, including customer, business partner and employee information.
Compliance	We comply with the Code, the law and The Energy One Group policies and procedures.

3 Corporate Reputation

We act in Energy One's best interests and value Energy One's reputation in the marketplace.

About this principle:

The Energy One Group's shareholders, customers and the community at large expect The Energy One Group and everyone who works at The Energy One Group to act professionally and ethically. Everyone connected with The Energy One Group has a role to play in shaping our corporate reputation by considering how their or someone else's actions could impact on Energy One's performance and reputation in the marketplace.

Our expectations of you:

- Deal fairly and honestly with Energy One Group's customers, suppliers, competitors or any other third party that is involved with our business.
 - Only provide advice to customers that you are authorised to provide in the course of your work.
 - Help protect The Energy One Group and our customers against potential theft or fraud.
 - Exercise your financial authorities, expenditure, payment options and reimbursement transactions within limits outlined by relevant policies.
 - You should not make any payments or payments in kind (gifts, favours, etc.) to influence individuals to award business opportunities to Energy One or make business decisions in the Company's favour.
 - Energy One does not tolerate bribery, corruption, kickbacks, secret commissions, facilitation payments or any other improper advantage. You must not directly or indirectly offer, promise, authorise, give, request or accept anything of value to improperly influence a person, obtain or retain business, secure an unfair advantage, or reward improper conduct. This prohibition applies to dealings with both public officials and private-sector parties and cannot be avoided by using an agent, consultant, supplier or other intermediary.
 - Use Energy One Group systems and equipment appropriately and for proper purposes. This includes email, messaging, internet access and technology and financial systems.
 - Never entertain customers or participate in Energy One Group activities or functions in a way that may damage Energy One's reputation.
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4 Respect Others

We treat others with respect, value difference and maintain a safe working environment.

About this principle:

At Energy One, we expect our people to treat colleagues, customers, suppliers, and all other third parties with dignity, respect, and professionalism.

Our expectations of you:

- Treat colleagues, customers, suppliers and other third parties with dignity, courtesy and respect.
- Contribute to a safe, inclusive and respectful work environment.
- Refrain from engaging in discrimination, bullying, harassment, sexual harassment, sex-based harassment, victimisation, retaliation, violence or any other unreasonable, offensive or inappropriate conduct.
- Maintain professional and respectful behaviour when working in the workplace, remotely, during work-related travel or functions, at customer or supplier locations, and when using work-related communications, messaging platforms or social media.
- Speak up and raise concerns about behaviour or situations that may impact the safety, wellbeing or dignity of others.
- Cooperate with reasonable measures taken by the Company to prevent, investigate or address inappropriate conduct and workplace concerns.
- Support a culture of respect, inclusion and accountability through their conduct and interactions with others.

Energy One respects the rights of individuals to work in a safe working environment.

For more information refer to related policies:

Discrimination, Bullying and Harassment Policy

Health and Safety Policy

5 Conflicts of Interest

We identify conflicts of interest and manage them responsibly.

About this principle:

Employees are required to act ethically and professionally at all times and may not allow any actual, potential or perceived conflict of interest to affect the company's operations. A conflict of interest can occur when an worker put their own personal interests before those of Energy One or our customers.

Our expectations of you:

Promptly disclose any actual, potential or perceived conflict of interest to their manager or People & Culture. This includes conflicts arising from:

- outside employment,
- directorships,
- business interests,
- investments,
- family or close personal relationships,
- recruitment or employment decisions,
- procurement activities, or
- dealings with customers, suppliers and competitors.

Until the conflict has been reviewed, workers must not participate in, influence or access confidential information relating to the relevant decision unless authorised to do so. Disclosing a conflict does not necessarily mean that the activity is prohibited.

Energy One will determine whether the conflict can be appropriately managed and may put agreed controls in place.

For more information refer to related policies:

Conflict of Interest Policy

6 Personal Benefits

We do not make or receive improper benefits or gains.

About this principle:

Where a reward from a current or potential customer or supplier creates an obligation or expectation that you will give preferential treatment to the person or company offering the reward, the reward is improper and therefore must be refused.

Our expectations of you:

- Workers must not offer, request, give or accept any gift, benefit, hospitality, travel, accommodation, discount, donation or other advantage that could improperly influence, or reasonably be perceived as influencing, a business decision.
 - Cash and cash-equivalent gifts must not be given or accepted.
 - Gifts and hospitality must comply with applicable approval, recording and value requirements, including any requirement to record the item in the Gifts and Hospitality Register.
 - Additional restrictions apply to dealings with public officials.
 - If unsure whether an item is appropriate, seek approval before offering or accepting it.
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7 Privacy and Confidentiality

We respect and maintain privacy and confidentiality, including customer, business partner and employee information.

About this principle:

In your work at The Energy One Group you may come across private and confidential information relating to The Energy One Group, colleagues, customers, suppliers or other third parties. When people provide this information, they do so with the understanding that their private and confidential information will be handled professionally. Misuse of confidential or private information can have commercial and reputational consequences for The Energy One Group and can impact those whose information has been misused. The Energy One Group is committed to maintaining the confidentiality and security of private information and you are asked to honour this commitment.

Our expectations of you:

- You must access, collect, use, store, share, retain and dispose of personal, confidential and commercially sensitive information only where authorised and for a legitimate business purpose.
- Information must be stored and shared using approved systems and protected from unauthorised access, loss, misuse or disclosure.
- You must not enter confidential, personal or commercially sensitive information into an unapproved external platform, including an unapproved artificial intelligence tool.
- Any actual or suspected privacy, confidentiality or cyber security incident must be reported immediately through the applicable incident-reporting process.

For more information refer to related policies:

Privacy Policy

Confidentiality Policy

8 C o m p l i a n c e

We comply with the Code, the law and The Energy One Group policies and procedures.

About this principle:

You must be familiar and comply with all relevant laws and regulations in relation to your employment at The Energy One Group. Any breaches of the law can have serious consequences for both The Energy One Group and yourself as an individual.

Our expectations of you:

- Always conduct yourself according to the requirements outlined in this Code, in legislation, and Energy One Group policies and procedures.
 - Complete all required training to ensure you are aware of and fully understand the relevant laws, policies, procedures and practices that relate to working at The Energy One Group.
 - Any activities conducted by you or Energy One outside your country of employment must adhere to the applicable laws applicable in the country or jurisdiction in which the activity occurs. Being uninformed about the law is not justification for breaking it.
 - If you are unsure of whether a law, policy or procedure applies to you, please seek guidance from your manager.
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9 Reporting Breaches

We immediately report any breaches of the Code, the law or The Energy One Group policies and procedures.

About this principle:

People working with or for The Energy One Group are required to comply with the principles outlined both in the Code of Conduct and related policies.

Failure to comply with this Code or an applicable Energy One Group policy may constitute misconduct or a failure to meet the standards expected of our people. Concerns will be assessed fairly and in context, and may result in appropriate disciplinary or remedial action, up to and including termination of employment or engagement, subject to applicable law, contractual obligations and procedural fairness.

Our expectations of you:

You should raise a concern as soon as reasonably practicable through any reporting channel with which you feel comfortable. Depending on the circumstances, you may report the matter to:

- your manager or another manager;
- a member of People & Culture;
- an authorised reporting contact identified on the Energy One intranet;
- a person or channel identified in the Whistleblower Policy; or
- another reporting channel required or permitted under applicable law.

You are not required to report a concern to a person who is involved in the matter. If a concern involves your manager, People & Culture, a senior executive or a director, you should use an alternative reporting channel. Reports will be redirected to the appropriate process where necessary, including the grievance, health and safety, privacy, discrimination and harassment, or whistleblower process.

No Disadvantage for Reporting:

Energy One prohibits retaliation, victimisation or detrimental treatment against a person because they have raised a concern, made a report, sought guidance, assisted with an enquiry or investigation, or exercised a workplace right. This protection applies where the person acts honestly and has reasonable grounds for their concern, even if the concern is not ultimately substantiated.

A report will not be considered false or improper merely because it is mistaken or cannot be substantiated. However, knowingly providing false information, fabricating evidence or making a deliberately malicious report may itself be a breach of this Code. Concerns about retaliation should be reported immediately through any of the reporting channels in this Code.

What the Company will do:

The Energy One Group is committed to investigating matters raised where sufficient information is provided to warrant an investigation. Our leaders are committed to dealing fairly and honestly with any reports that are brought to their attention, and to working with team members to resolve issues.

For more information refer to related policies:

Whistleblower Policy

Consequences of Breaching the Code

Energy One will assess and, where appropriate, investigate suspected breaches of this Code in a fair, impartial, timely and proportionate manner. Information will be handled sensitively and shared only with those who need it to assess, investigate or respond to the matter, or where disclosure is otherwise required or permitted by law. A person who is the subject of an allegation will ordinarily be given sufficient information about the substance of the concern and a reasonable opportunity to respond before findings or disciplinary decisions are made.

If a breach is substantiated, Energy One may take disciplinary, corrective or remedial action that is appropriate to the circumstances and seriousness of the conduct. This may include guidance, additional training, coaching, counselling, changes to duties or access, formal warnings, termination of employment or engagement, recovery action, or referral to an appropriate authority. Any action will be taken subject to applicable law, contractual obligations, relevant policies and procedural fairness.

Energy One also reserves the right to notify the relevant authorities if criminal or other unlawful activity is suspected.
