

Phoenix Energy Holdings Ltd

Supplier Code of Conduct

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Policy Authorisation:

Policy raised by: Chris Losty – Contracts and Procurement Manager

Policy authorised by: Peter Markwell – Finance Director

VERSION CONTROL

Issue	Author	Date	Changes
01	John Small	22/07/2025	<ul style="list-style-type: none">• Update and reformatted to align with company rebranding to Phoenix Energy Holdings.• Version Control included to identify changes in each issue of the policy.• Formatting changes.

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1. PURPOSE & SCOPE

Phoenix Energy Holdings Limited (together with its subsidiaries, the “Group”) works with a large range of suppliers, contractors, and service providers (“business partners and suppliers”) that meet its standards and quality requirements. It strongly encourages sound environmental performance, social well-being, and governance (“sustainability”) practices amongst its business partners and suppliers.

The Group is aware of the broader influence it has and therefore has developed this Supplier Code of Conduct (the “Code”) as a guide to its business partners and suppliers and to encourage compliance with items in the Code so as to bring broader improvements in sustainability practices and performance for its business partners and suppliers and the communities the Group serves.

This Code should also be read in connection with our Modern Slavery Policy and Bribery Tax Evasion Prevention Policy which are available on our internet site at www.phoenixenergyni.com/about-us/phoenix-group/compliance.

2. APPROACH

The Group works with its business partners and suppliers which demonstrate adherence to best practices. It encourages business partners and suppliers to improve sustainability standards and practices, whilst respecting local traditions, cultures and norms.

The Group’s business partners and suppliers are expected to disseminate and educate the requirements of this Code to their employees, agents, sub-contractors and suppliers, and hold them accountable for any non-conformance acts.

The Group also encourages and expects its business partners and suppliers to periodically assess themselves and their suppliers for conformance and communicate their conformance status to the Group when requested. If non-conformance to this Code is detected, the Group will attempt to work with them to correct the situation. The Group expects the business partners and suppliers concerned to develop a corrective plan to bring its operations into Code conformance. If a business partner or supplier does not develop such a plan or fails to implement it, the Group may terminate the business relationship.

The content of this Code has been developed taking into consideration a number of international charters and conventions such as the United Nation’s Declaration on Human Rights and the International Labour Organisation’s 1998 Declaration on Fundamental Principles and Rights at Work (each as amended from time to time).

3. POLICY

3.1 Promoting Ethical Standards

The Group encourages its business partners and suppliers to act in accordance with the highest standards of ethical conduct and professionalism. In addition to these standards, the Group reiterates the importance of being compliant with all local and national legislation and to avoid all forms of corruption and bribery. In particular, the Group's business partners and suppliers are required to implement anti-corruption policies and programmes, and to verify that such policies and programmes are complied with. It also encourages its business partners and suppliers to establish their own policies, practices and systems to ensure the promotion and dissemination of their own codes of conduct, where available, within their operations.

3.2 Protecting the Rights of All Employees

To safeguard the rights and dignity of employees, the Group encourages its business partners and suppliers to abide by the standards and conditions detailed below:

- Ensure a fair and equitable workplace environment that is free from any form of harassment or discrimination based on, but not limited to, age, race or ethnic origin, disability, gender, nationality, marital status, sexual orientation, political convictions or union affiliation.
- Provide a work environment that pays due consideration to safety and minimises any health hazards or harm to employees.
- Prohibit the use of forced, prison, bonded and child (as defined by the applicable legislation) labour as well as any form of slavery or human trafficking and remain in compliance with all applicable minimum working age and modern slavery legislation.
- Abide by any legislation governing minimum wage payments, and where none is available, ensure that salaries are commensurate with experience and industry standards.
- Comply with regulation or legislation, where it is applicable, on maximum working hours.
- Implement clear, uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting corporal punishment, including mental, physical or verbal abuse.
- Ensure that employees are provided with freedom of association and the right to collective bargaining. Where no such legislation on collective bargaining exists locally, appropriate channels should be made available for discussion and recourse on labour related issues.

3.3 Operating Responsibly

The Group encourages its business partners and suppliers to consider the risks posed to their operations from climate change and to actively mitigate their environmental impacts. It also reiterates to its business partners and suppliers the value brought to business in terms of more efficient resource consumption and monitoring of wastage.

The Group invites its business partners and suppliers to emulate the standards, practices and principles outlined below and in its Environmental Policy.

- Abide by all relevant local and national environmental legislation, regulations and in a manner that ensures environmental preservation.
- Minimise the consumption of energy and carbon footprint from operations through the implementation of environmental policies and environmental management systems.
- Encourage the use of environmentally friendly technology that can reduce energy consumption, minimise the need for business travel, and reduce reliance on resources such as paper.
- Expand the use of environmentally friendly, recycled and/or sustainably forested materials and products in operations.
- Promote the recycling of waste while taking the necessary precautions and ensure compliance with legislation on the handling or disposal of any hazardous materials in operations.

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