Anti-Bribery and Anti-Corruption Policy

JADESTONE ENERGY PLC

Controlled Document

Document Owner: Corporate Human Resources

Last Updated: 10 July 2026

Document Number: JSE012/2017

INTRODUCTION

Jadestone is committed to the highest standards of professionalism and integrity wherever we operate.

In line with this commitment, we never offer or accept bribes. We abide by all applicable anti-bribery and anti-corruption laws. Our policies and practices are compatible with the *UK Bribery Act*, the US *Foreign Corrupt Practices Act* (FCPA) and other applicable equivalent national and international anti-corruption legislation.

This policy applies to all Jadestone directors and employees as well as to contractors, suppliers, consultants and other third parties who work on the company's behalf. It should be read in conjunction with the Jadestone Code of Conduct as well as the Whistleblowing Policy, the Insider Trading Policy and the Gifts, Entertainment and Hospitality Guidelines.

NO BRIBES

We do not pay bribes to anyone, whether they represent a public agency or a private company. We understand bribery to include any inducement to secure a commercial or other advantage that is incompatible with the bribe-receiver's duties and responsibilities. We do not offer or accept bribes in any form, whether these include financial payments, gifts, favours or offers of employment.

PUBLIC OFFICIALS

Bribing or corrupting a public official is a serious offence, can carry severe penalties and can cause significant reputational damage. Jadestone takes special care to comply rigorously with laws prohibiting bribery of public officials, including employees of state-owned enterprises. We will not offer anything of value to a public official in order to influence an official or commercial decision.

BUSINESS PARTNERS

Jadestone works with a wide range of contractors, suppliers, consultants and other third parties. We select our business partners on the basis of price, professional competence and integrity. We expect all third parties to abide by the same standards as our own when working on our behalf, and this includes a commitment not to offer or accept bribes. If a third party fails to follow our integrity standards, we reserve the right to withdraw from the business relationship.

NO "FACILITATION PAYMENTS"

"Facilitation payments" are small amounts paid to individual officers to speed up legitimate transactions such as customs clearances or applications for utility connections. Jadestone will not make such payments, even where they are customary, and we will not authorise others to make them on our behalf.

GIFTS, ENTERTAINMENT AND HOSPITALITY

Offering or receiving gifts, entertainment and hospitality is often a legitimate part of the process of commercial relationship-building. However, it is essential to ensure that these are offered as an expression of goodwill and not in expectation of a return favour.

Jadestone will never offer or accept gifts or other benefits that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty. A gift that is made in the expectation of receiving something in return could be seen as a bribe. We need to take special care when dealing with government officials who are often subject to particularly strict rules.

The Guidelines on Gifts, Entertainment and Hospitality give more detailed guidance on these points.

BOOKS AND RECORDS

Jadestone will always keep accurate books and records, and our accounts are fully audited. We will never make hidden or under-the-table payments.

FRAUD

In addition to prohibiting bribery and corruption, Jadestone also prohibits fraud in any form. Fraud includes deliberate deception, financial misrepresentation, or misuse of company assets or information for personal or corporate gain. Examples include falsifying financial records, diverting funds or resources, supply chain manipulation, cyber or data fraud, corruption, or any other act intended to secure an improper advantage or cause loss to Jadestone or its stakeholders.

All Jadestone directors, employees, contractors, suppliers, consultants, and third parties working with Jadestone must act with absolute integrity and comply with our internal controls and due diligence requirements. Any suspected fraudulent activity must be reported immediately to a Team Leader, the Human Resources Manager, the General Counsel, or through Jadestone's independent external hotline, Safecall.

Confirmed instances of fraud will result in disciplinary action, up to and including termination of employment or contracts, recovery of losses, and legal proceedings.

CONFLICTS OF INTEREST

Jadestone directors and employees must avoid any situations where their personal interests conflict with those of the company. Similarly, they may not use commercially sensitive information gained while working for Jadestone for personal benefit, for example by sharing it with a potential supplier with whom they have a personal or family connection.

We must avoid even the appearance of a conflict. Anyone who thinks that they may have a conflict should raise the matter with their line manager in the first instance, or the General Counsel or Legal department, sharing all necessary details.

If there is a potential for a conflict, the interests of Jadestone must take priority.

POLITICAL DONATIONS

Jadestone has a strict policy of political neutrality. We do not make donations to political parties, candidates or electoral campaigns.

We reserve the right to make our position known on matters of public policy that may affect our company or industry. However, we will always do so ethically and transparently.

CHARITABLE DONATIONS AND SPONSORSHIPS

As part of our community engagement, Jadestone may make donations or sponsorships to civil society organisations that serve a legitimate philanthropic or educational purpose.

We will keep a careful record of all such donations, and we will only work with organisations that are themselves transparent and accountable. We expect to see clear accounts of how our money is spent.

RAISING CONCERNS AND REPORTING BREACHES

If Jadestone employees have any concerns or questions about the application of this policy, they should in the first instance consult their line managers. Alternatively, they may contact the General Counsel or Legal department.

If Jadestone employees or external stakeholders become aware of an actual or suspected breach of this policy, they should contact the General Counsel.

In accordance with Jadestone's Whistleblower Policy, we will always respect the confidentiality of whistleblowers unless we are required by law to disclose information to the investigating authorities.

DISCIPLINARY ISSUES

Jadestone takes breaches of the policy very seriously. We will take disciplinary action – potentially including dismissal – against any employee who pays or receives a bribe or facilitates a bribery payment. Jadestone will not penalise any employee who raises legitimate concerns or reports suspected breaches of this policy that ultimately turn out to be unfounded.

RESPONSIBILITIES

All Jadestone directors, employees, contractors, suppliers, consultants and other third-party suppliers acting on Jadestone's behalf are required to abide by this policy.

Jadestone managers are responsible for ensuring that their team members understand the policy and know how to apply it in the course of their specific work and duties.

The Jadestone Board has overall responsibility for supervising the implementation of this policy. The General Counsel is responsible for reporting to the Board, through the Audit Committee, on the details of implementation.

Approval Date: 5 March 2026
Approved by: Board of Directors