

Code of Conduct for Employees

Effective Date: January 5th, 2026

Last Reviewed: January 5th, 2026

Next Review Date: January 5th, 2027

1. Purpose

This Code of Conduct outlines the standards of behavior expected of all employees, contractors, and third-party partners of Legacy Energies Inc. The Code ensures that our business is conducted ethically, with integrity, and in compliance with all legal and regulatory requirements.

2. Scope

This policy applies to all employees, officers, directors, contractors, and consultants representing Legacy Energies Inc. It applies across all jurisdictions and to every aspect of the company's operations, including interactions with stakeholders, suppliers, and regulatory bodies.

3. Core Values and Ethical Standards

3.1 Integrity:

Legacy Energies Inc. operates with honesty and transparency in all business dealings. Employees must conduct themselves in a manner that upholds the company's reputation for integrity and ethical practices.

3.2 Legal Compliance:

All employees are required to comply with the laws and regulations that govern our industry, including but not limited to environmental, health and safety, anti-corruption, labor, and international trade laws.

3.3 Accountability:

Every employee is accountable for their actions and decisions. This includes taking responsibility for upholding the company's values and complying with both the letter and spirit of the law.

3.4 Professionalism:

Employees must demonstrate professionalism in their work, interactions, and communications, ensuring respectful, non-discriminatory behavior that fosters a positive and inclusive workplace.

4. Responsibilities of Employees

4.1 Personal Conduct:

Employees must maintain high standards of personal conduct in the workplace. This includes treating colleagues, clients, and stakeholders with respect, and avoiding any behavior that could be perceived as harassment, bullying, or discriminatory.

4.2 Conflict of Interest:

Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of Legacy Energies Inc. All potential conflicts must be disclosed to management, and employees must refrain from decision-making where a conflict exists.

4.3 Confidentiality:

Employees must protect Legacy's confidential and proprietary information, including trade secrets, financial data, and any personal information of employees, clients, or partners. Confidential information must not be disclosed to unauthorized individuals or entities.

4.4 Use of Company Resources:

Employees must use company assets, including information systems, equipment, and financial resources, only for legitimate business purposes. Misuse, unauthorized access, or fraudulent activities involving company resources will lead to disciplinary action.

5. Health, Safety, and Environmental Responsibility

5.1 Safety Commitment:

Legacy is committed to providing a safe and healthy work environment for all employees. Employees are expected to follow all safety protocols, report unsafe conditions, and take personal responsibility for workplace safety. Compliance with Occupational Safety and Health Administration (OSHA) standards and other relevant regulations is mandatory.

5.2 Environmental Stewardship:

As part of the oil and gas industry, Legacy is dedicated to minimizing its environmental footprint. Employees must follow all environmental regulations and procedures, including proper waste management, pollution prevention, and energy efficiency practices.

6. Anti-Bribery and Corruption

6.1 Zero Tolerance for Bribery:

In line with the Anti-Bribery and Corruption Policy, employees must not engage in any form of bribery, kickbacks, or corrupt activities. Any attempt to offer or accept an undue advantage in exchange for business or other favors will result in disciplinary action.

6.2 Gifts and Hospitality:

Modest gifts and hospitality are acceptable if they are reasonable, transparent, and not intended to influence business decisions. Employees must report any gifts or hospitality exceeding [Insert Amount] to their line manager and record it in the Gifts and Hospitality Register.

7. Fair Competition and Anti-Trust Compliance

7.1 Commitment to Fair Competition:

Legacy Energies Inc. is committed to complying with all competition and antitrust laws. Employees must not engage in collusion, price-fixing, or any practices that unfairly restrict competition in any market.

8. Diversity, Inclusion, and Equal Opportunity

8.1 Non-Discrimination Policy:

Legacy Energies Inc. values diversity and is committed to providing a workplace free of discrimination based on race, gender, age, nationality, religion, sexual orientation, or any other protected characteristic.

8.2 Inclusion:

We promote an inclusive environment where all employees can thrive. Legacy supports equal opportunity for advancement and ensures that all employment decisions are made based on merit.

9. Reporting Violations

9.1 Obligation to Report:

Employees are encouraged to report any known or suspected violations of this Code of Conduct. Legacy provides confidential channels, including the Whistleblower Hotline and Internal Compliance Office, for reporting concerns.

9.2 Non-Retaliation:

Legacy will not tolerate retaliation against employees who report concerns in good faith. Any act of retaliation will be met with disciplinary action, up to and including termination.

10. Disciplinary Action

10.1 Consequences for Violations:

Violations of this Code of Conduct may result in disciplinary measures, including termination of employment, civil or criminal prosecution, and fines where applicable. The company will take immediate action to address any confirmed breaches.

11. Training and Awareness

11.1 Mandatory Training:

All employees must complete mandatory training on this Code of Conduct and its key components, including anti-corruption, health and safety, and environmental responsibilities. Regular refresher training will be conducted to ensure ongoing compliance.

12. Monitoring and Review

12.1 Policy Review:

This Code of Conduct will be reviewed annually or when necessary to ensure it remains aligned with legal and industry standards. Amendments will be communicated to all employees.