ANTI-BRIBERY & CORRUPTION POLICY

1. PURPOSE

Elixir Energy Limited ("Elixir" or "the Company") is committed to facilitating a culture of honest and ethical behaviour, corporate compliance and good corporate governance. Elixir encourages the reporting of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving its business.

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of Elixir's business. Elixir is aware that any incident of Bribery or Corruption involving, or relating to, the Company could give rise to material adverse legal consequences and would cause damage to its reputation, impede business growth and potentially affect the Company's share price.

The purpose of this Policy is to set out the Company's committed opposition to Bribery and Corruption and to ensure all Employees, Directors, Contractors, Consultants, Third Parties and Associated Persons understand their individual responsibilities for compliance in connection with the Company's business and operations. The main objective of the Policy is to support the maintenance of a robust culture of integrity, transparency and compliance, which is critical to long term success and value preservation in the business.

This Policy also serves to safeguard and make transparent relationships of Directors and Employees with external parties in the context of receiving and giving hospitality, gifts and other financial benefits for legitimate purposes consistent with normal business practice.

This policy is available on the website of Elixir Energy Ltd (www.elixierenergy.com.au).

This Policy supplements any other policies applicable to Elixir Energy Ltd.

2. SCOPE

This Policy applies to Employees, Directors, Contractors, Consultants, Third Parties and Associated Persons in connection with Elixir's business and operations. It is the responsibility of each Employee, Director, Contractor and Consultant to be aware of and compliant with this Policy.

3. MAKING OR RECEIVING BRIBES

The Company expressly forbids:

(a) making, offering or promising to make a payment or transfer anything of value, including the provision of any service, gift, meal or entertainment, to government officers and other officials for the purpose of improperly influencing, obtaining or retaining business, or for any other improper purpose or business advantage; or

(b) making improper payments as described above, through third parties.

Bribes can take the form of cash, gift cards, entertainment, travel allowances, hospitality including flight upgrades and hotel rooms, discounts, perks and benefits to relatives of an employee, and stakeholder expenses including fees where a fee is not legitimately due. Kickbacks and secret commissions such as undisclosed transactions of value offered to influence an outcome are also Bribes.

For the avoidance of doubt, this policy does not prohibit standard global business practices of socialising with and entertaining key counterparts (such as suppliers, customers and Government officials) with a view to legitimately and transparently benefiting the Company's business.

4. OTHER CONDUCT – FINANCIAL BENEFITS

The following general principles apply to financial benefits which are not Bribes:

(a) there must be a legitimate business purpose that justifies the giving or the receiving of hospitality, gifts, or other financial benefit as an expression of appreciation of an ongoing relationship; the recipient must not be placed under any obligation to give or do anything in return;

(b) gifts should never be given or received in cash or cash equivalents (e.g. gift cards);

(c) gifts, entertainment and hospitality offered by the Company should be aligned to the Company's Code of Conduct, in terms of good taste and reflecting the professionalism and integrity of the Company, and

(d) unless previously specifically approved by the Board or the Company's Chairman, all hospitality, gifts, or other financial benefits received and given by employees, and that cost more than the figure stated below per person, must be fully and accurately documented in a register in a transparent way to avoid the appearance of impropriety.

Dollar limits:

- Directors and CEO - $300
- All other staff - $100

Changes made to the register will be reported at each Board meeting.

5. REPORTING AND INVESTIGATING BREACHES AND SUSPECTED BREACHES

All employees are responsible for reporting breaches or suspected breaches of this Policy, or any other conduct involving Bribery or Corruption which is not stipulated in this Policy, pursuant to the Company's Whistleblower Policy. All safeguards in terms of confidentiality and the ongoing support and protection of the Company provided for in that Policy will apply in these circumstances.

Adopted at the Board Meeting:



28 May 2026

…… ……

Richard Cottee Date