

Whistleblower Protection Policy

1.1 Purpose and Application of this Policy

The following policy has been adopted by the Audit & Risk Management Committee of the Board of Directors (the Audit & Risk Management Committee) of Tamboran Resources Corporation (**Tamboran**). Tamboran is committed to complying with all laws, rules and regulations in the jurisdictions that it operates in, including in relation to maintaining proper books and records.

Tamboran wishes to encourage and protect individuals who disclose information concerning Accounting Complaints, misconduct, an improper state of affairs, or other similar circumstances within our Group.

This policy has been adopted to provide a safe and confidential environment where such concerns can be raised by Whistleblowers without fear of reprisal or detrimental treatment.

This policy sets out:

- (a) who is entitled to protection as a Whistleblower under this policy;
- (b) the protections Whistleblowers are entitled to; and
- (c) how disclosures made by Whistleblowers will be handled by our Group.

This policy is made available to Group officers and employees on the corporate section of Tamboran's website. All Group officers, employees and contractors must comply with this policy.

Certain capitalised terms are defined in the Glossary at the end of this policy.

1.2 How Does This Policy Interact with Statutory Whistleblower Regimes?

- (a) By making a disclosure in accordance with this policy, you may be afforded protection under the Statutory Whistleblower Regimes.
- (b) This policy principally deals with internal disclosures of information made by employees. In relation to Accounting Complaints, this policy is intended to meet the requirements of Rule 10A-3(b)(3) under the Securities and Exchange Act of 1934, as amended.
- (c) The Statutory Whistleblower Regimes also protect some types of disclosure made to external parties, but only where permitted within the applicable laws of Australia or the USA.

1.3 Who is Eligible for Whistleblower Protection Under This Policy?

To be treated as a Whistleblower under this policy you must:

- (a) be one of the individuals set out in section 1.4;
- (b) disclose information regarding the type of matters set out in section 1.5; and
- (c) disclose that information to one of the persons set out in section 1.6.

This policy also protects those who are entitled to whistleblower protection under the Statutory Whistleblower Regimes as noted above.

1.4 Who May Make a Disclosure?

Disclosures can be made by a current or former:

- (a) Director, officer or employee of our Group;
- (b) contractor or supplier of goods and services to our Group, or their current and former employees;
- (c) Associate of our Group; or
- (d) Family Member of an individual mentioned in 1.4(a) to 1.4(c) above.

You may choose to disclose information anonymously if you wish, including through the whistleblower hotline, which Tamboran has established and which is available 24 hours a day, 7 days a week, by visiting www.tamboran.deloitte.com.au.

1.5 What Types of Matters Can Be Disclosed?

- (a) Disclosable matters may include:
 - (i) An Accounting Complaint;
 - (ii) Misconduct or an Improper State of Affairs or Circumstances in relation to the Group, including in relation to corporate governance, tax payments or compliance;
 - (iii) illegal conduct at the Group or by an Officer or employee of the Group, such as fraud, theft, corruption, bribery, drug supply or use, violence, harassment and intimidation, criminal damage to property or breaches of work health and safety laws;
 - (iv) improper, unethical or dishonest conduct at the Group or by an Officer or employee of the Group, such as breaches of our policies (including our Code of Conduct or this policy) or a misuse of company assets, conflicts of interest or abuses of authority;
 - (v) an activity that poses a substantial risk to the health and safety of any people, or significant damage to property or the environment;

- (vi) discrimination based on gender, ethnicity, age or any other attribute covered by our Diversity Policy;
 - (vii) misrepresentation or false statement regarding a matter contained in the financial records, financial reports or audit reports of the Group;
 - (viii) an activity that constitutes a danger to the public or financial system;
 - (ix) engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure, or who is believed or suspected or having made a disclosure under this Policy, or
 - (x) conduct that is damaging to the Group's financial position or reputation.
- (b) You must have reasonable grounds for making a disclosure and must provide as much detail and supporting information as possible regarding your concern in order to assist the investigative process.
 - (c) Your disclosure cannot solely be about a Personal Work-related Grievance.
 - (d) The preceding is not an exhaustive list, and certain Accounting Complaints regarding matters not listed here may be submitted as well.

1.6 Who Should I Disclose To?

We encourage you to make your disclosure in writing to our Whistleblower Protection Officer:

Rohan Vardaro, General Counsel and Company Secretary:

phone: 0422 100 074

email: rohan.vardaro@tamboran.com

Alternatively, disclosures can be made to any one of the following:

- (a) Directors or Officers of the Group;
- (b) An auditor or member of the external audit team conducting an audit on our Group (the current auditor is Ernst & Young);
- (c) Tamboran's external whistleblower hotline operated by Deloitte:
website details: www.tamboran.deloitte.com.au
- (d) For Accounting Complaints, we encourage you to make your disclosure directly orally or in writing, directly to the Chair of the Audit & Risk Management Committee at the following address:

Name: Tamboran Resources Corporation

Address: Tower One, International Towers, Suite 1, Level 39,

100 Barangaroo Avenue, Barangaroo NSW 2000, Australia

Attention: Audit & Risk Management Committee Chair

Other than as noted under section 1.8 below, your disclosure can be made to any one of the above anonymously.

1.7 Whistleblower Identity Must Be Kept Confidential

Subject to section applicable U.S. or Australian Law, the identity of a Whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential unless the Whistleblower has consented to the disclosure.

1.8 Permitted Exceptions

The identity of a Whistleblower (or information that is likely to lead to their identity becoming known) may be disclosed without the Whistleblower's consent if the disclosure:

Is made to:

- (a) a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the Statutory Whistleblower Regimes;
- (b) the Australian Police;
- (c) the Australian Securities and Investments Commission;
- (d) the Australian Commissioner of Taxation if the disclosure concerns the Group's tax affairs or the tax affairs of an Associate of our Group, or

Relates to:

- (e) An Accounting Complaint made by a non-employee of the Group.

1.9 Provision of Whistleblower Information to a Court or Tribunal

You must not disclose or produce to a court or tribunal any information or documents which discloses the identity of a Whistleblower (or information likely to lead their identity becoming known) without seeking the advice of Tamboran's General Counsel.

1.10 No Victimisation Based on Whistleblower Status

You must not cause or threaten any Detriment to any person for a reason which includes that they or any other person:

- (a) is or proposes to be a Whistleblower; or
- (b) is suspected or believed to be, or could be, a Whistleblower.

1.11 Whistleblower Immunity; No Retaliation

- (a) The Company will not discipline, discriminate against or retaliate against any person who reports or who assists in the investigation of an Accounting Complaint in good faith and will not tolerate any such action. The Group will

abide by all applicable laws that prohibit retaliation against those who lawfully submit complaints under this Policy.

- (b) You must not:
 - (i) subject a Whistleblower to any liability or disciplinary action; or
 - (ii) enforce a remedy or exercise a right against a Whistleblower, solely for making a disclosure.
- (c) A Whistleblower may be held liable for any personal misconduct revealed by their disclosure or an investigation following a disclosure.

Nothing in this policy prevents you from communicating directly with relevant government authorities about potential violations of law.

1.12 Investigations of Information Disclosed Under This Policy

When a disclosure is made which may fall under this policy, the following steps must be followed except where, in the opinion of the Whistleblower Protection Officer, it would be inappropriate or unreasonable in the circumstances to do so:

- (a) the person listed in section 1.6 who received the information must provide the information to the Whistleblower Protection Officer (or in the case of an Accounting Complaint, to the Audit & Risk Management Committee Chair, or other such person as the Audit & Risk Management Committee determines to be appropriate) as soon as practicable, removing any information which identifies or may identify the discloser of the information (the potential Whistleblower) prior to doing so (unless the potential Whistleblower has provided their consent to that disclosure);
- (b) as soon as practicable, the Whistleblower Protection Officer (or in the case of an Accounting Complaint, the Audit & Risk Management Committee Chair, or other such person as the Audit & Risk Management Committee determines to be appropriate) must determine whether the disclosure falls within the scope of this policy and, if so, investigate the complaint themselves or appoint an investigator with no personal interest in the matter, who will also comply with the terms of this policy, to conduct an investigation into the matters disclosed, if they determine it to be necessary or appropriate;
- (c) the investigator must conduct any investigation in an objective and fair manner, ensuring to provide any employee who has been adversely mentioned in information provided by a Whistleblower an opportunity to respond to the allegations made in respect of them prior to any adverse findings being made;
- (d) the outcome of the investigation must be reported to the Board without management present (or in the case of an Accounting Complaint, directly to the Audit & Risk Management Committee Chair), and may be reported to the Whistleblower and any persons affected as the Whistleblower Protection Officer (or Audit & Risk Management Committee Chair) considers appropriate;

- (e) If determined necessary by the Whistleblower Protection Officer (or Audit & Risk Management Committee Chair, or other such person as the Audit & Risk Management Committee determines to be appropriate), the Group shall provide for appropriate funding to obtain and pay for additional resources that may be necessary to conduct any investigation including without limitation, retaining outside counsel, outside accounting experts and/or expert witnesses.
- (f) subject to the exceptions allowed under section 1.8 of this policy or otherwise by law, the identity of a Whistleblower (or information that is likely to lead to their identity becoming known) must be kept confidential at all times during and after the investigation (including in any reporting to the Board or to any persons affected). All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a Whistleblower will be identified; and
- (g) a Whistleblower may raise any concerns or complaints regarding this policy or their treatment with the Whistleblower Protection Officer.
- (h) Except as required by law, Accounting Complaint investigations will not be disclosed to the public.

1.13 Board Reporting

Subject to the confidentiality obligations in section 1.7, the Whistleblower Protection Officer must provide to the Board, or any committee with delegated authority, periodic reports on all active Whistleblower matters, including information on:

- (a) the number and nature of disclosures made in the last quarter;
- (b) the status of any investigations underway; and
- (c) the outcomes of any investigations completed and actions taken as a result of those investigations.
- (d) For Accounting Complaints, reports must be made at least once per each calendar quarter and whenever else as deemed necessary, the Audit & Risk Management Committee Chair must provide to the Audit & Risk Management Committee and any member of Group management that the Audit & Risk Management Committee directs to receive such report, that summarizes each Accounting Complaint made within the last 12 months and shows specifically:
 - (i) the complainant (unless anonymous, in which case the report will so indicate);
 - (ii) a description of the substance of the Accounting Complaint;
 - (iii) the status of the investigation;
 - (iv) any conclusions reached by the investigator; and
 - (v) findings and recommendations.
 - (vi) Reports and records around Accounting Complaints are considered confidential information and access will be restricted to the Whistleblower

Protection Officer, the Chair of the Audit & Risk Management Committee, any person assigned to investigate the complaint, other members of Tamboran's legal department, if any, members of the Audit & Risk Management Committee, employees of the Group or outside counsel involved in investigating the Complaint. Access to records and reports may be granted to other parties at the discretion of the Audit & Risk Management Committee.

1.14 Training

All employees will be made aware of this policy and must attend compulsory training organised by the Group regarding the Group's whistleblower program.

All the persons listed in section 1.6 of this policy must attend compulsory training organised by the Group on responding appropriately to disclosures made by Whistleblowers or potential Whistleblowers.

1.15 Consequences for Non-Compliance with Policy

Any breach of sections 1.7 to 1.11 by an Officer, employee or contractor will be taken seriously by the Group and may be the subject of a separate investigation and/or disciplinary action.

A breach of this policy may also amount to a civil or criminal contravention under the Statutory Whistleblower Regimes, giving rise to significant penalties.

Any material incident that occurs under this policy shall be reported to the Board.

1.16 Retention of Records

All documents relating to a disclosure made under this policy shall be retained for at least five years from the date of the complaint, after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation, in which case the information may not be destroyed and must be retained for the duration of that litigation, inquiry or investigation and thereafter as necessary.

1.17 Review

The implementation and effectiveness of this policy is the responsibility of the Tamboran Board, the Audit & Risk Management Committee, the Whistleblower Protection Officer, or other such person as the Audit & Risk Management Committee determines to be appropriate.

This policy was authorised by the Full Board of Tamboran on 11 February 2026. It will be reviewed periodically and updated as required.

Glossary

Unless the context requires, italicised terms in this policy have the following meaning:

Accounting Complaint includes (without limitation) the following:

- (a) Fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the Securities and Exchange Commission (the “SEC”) or the investing public.
- (b) Violations of SEC rules and regulations or any other laws applicable to the Group’s financial accounting, maintenance of financial books and records, internal accounting controls and financial statement reviews or audits.
- (c) Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Group.
- (d) Significant deficiencies in or intentional noncompliance with the Group’s internal accounting controls.
- (e) Misrepresentation or false statement regarding a matter contained in the financial records, financial reports or audit reports of the Group.
- (f) Deviation from the full and fair reporting of the Group’s financial condition.

Associate means any individual who is:

- (a) an associate within the meaning of the Corporations Act; or
- (b) if the disclosure relates to our tax affairs, an associate within the meaning of section 318 of the *Income Tax Assessment Act 1936* (Cth).

Corporations Act means the *Corporations Act 2001* (Cth).

Detriment includes (without limitation) dismissal, injury of an employee in their employment, alteration of an employee’s position or duties to their disadvantage, discrimination, harassment or intimidation, harm or injury including psychological harm, damage to property, and reputational, financial or any other damage to a person.

Family Member means a:

- (a) Spouse, parent, child, sibling or other Relative of an individual; or
- (b) dependent of the individual or their Spouse.

Group means Tamboran Resources Corporation (US company number 7640969; ARBN 672 879 024) and its related bodies corporate in Australia and the United States of America.

Misconduct or an Improper State of Affairs or Circumstances includes (without limitation):

- (a) information regarding a criminal offence or contravention of the *Corporations Act, Australian Securities and Investments Commission Act 2001* (Cth)

suspected to have been committed by our Group, or an officer or employee of ours;

- (b) information regarding a Commonwealth criminal offence punishable by more than 12 months imprisonment suspected to have been committed by our Group, or an officer or employee of ours;
- (c) information regarding a danger to the public or the financial system posed by our Group, or an officer or employee of ours;
- (d) information concerning Misconduct or an Improper State of Affairs or Circumstances in relation to our tax affairs, or the tax affairs of an associate of our Group.

Personal Work-related Grievance means a grievance about any matter in relation to an individual's employment or former employment which has, or tends to have, implications only for the individual personally, and where the information does not:

- (a) have significant implications to the entity to which it relates, or any other entity, that does not relate to the individual;
- (b) concern the examples set out in items (a)-(d) of the definition of Misconduct or an Improper State of Affairs or Circumstances; or

concern Whistleblower victimisation (see section 1.10 and 1.11 of this policy).

Relative has the same meaning as in the *Corporations Act 2001* (Cth).

Spouse means the married, de facto or registered partner of the individual.

Statutory Whistleblower Regimes means the regimes contained in the *Corporations Act 2001* (Cth), the *Taxation Administration Act 1953* (Cth), the U.S. Securities and Exchange Commission and U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act.

Whistleblower means a person who is eligible for protection as a whistleblower under this policy or under the Statutory Whistleblower Regimes.

Whistleblower Protection Officer means the person identified in section 1.6 of this policy.