



2022

**MODERN  
SLAVERY  
STATEMENT**



# Highlights

## FY22

- ▶ Undertook annual review of Cooper Energy policies, procedures and guidelines
- ▶ Conducted modern slavery training with Board of Directors
- ▶ Whistleblower training provided to Board of Directors and staff
- ▶ Engaged an external ratings agency to screen the modern slavery practices of over 250 suppliers
- ▶ Finalised our supplier prequalification procedure
- ▶ Incorporated modern slavery clauses in all new supplier contracts
- ▶ Required new suppliers to complete modern slavery questionnaires
- ▶ Engaged with high-risk suppliers on their response to identifying and managing modern slavery risks
- ▶ Regular review and continuous improvement of our risk-related policies and governance control measures
- ▶ Continued provision of our anonymous whistleblower hotline

## FY23 AND BEYOND

- ▶ Continue review and assessment of the effectiveness of policies and procedures in identifying and minimising modern slavery risks across our business and supply chains
- ▶ Staff training on modern slavery risks scheduled for FY23
- ▶ Ensure modern slavery clauses incorporated in all new supplier contracts
- ▶ Continue engagement with suppliers on modern slavery risks
- ▶ Undertake an updated modern slavery risk assessment of our operations and supply chains
- ▶ Continue provision of our anonymous whistleblower hotline



# Introduction

This Modern Slavery Statement (**Statement**) is given by Cooper Energy under the Modern Slavery Act 2018 (Cth) (Act) for the financial year ending 30 June 2022 (**FY22**). This Statement covers the activities of Cooper Energy and its controlled entities (**Group**).

Modern slavery is an important and complex challenge facing the world today. Modern slavery describes situations of serious human exploitation and can include the following:

- ▶ human trafficking;
- ▶ slavery;
- ▶ servitude;
- ▶ forced marriage;
- ▶ forced labour;
- ▶ debt bondage;
- ▶ child labour; and
- ▶ deceptive recruiting for labour or services.

At Cooper Energy, we recognise that slavery and human trafficking can occur in many forms, and we are committed to protecting human rights across all areas where our business operates.

The purpose of this Statement is to outline our approach to ensuring that Cooper Energy has appropriate frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chains. We see this as a vital part of our corporate responsibility and inherent in the Cooper Energy Values.

# About Cooper Energy

Cooper Energy is an ASX (ASX:COE) listed energy company which contributes to Australia's sustainable energy future by commercialising gas, oil and other resources for domestic markets.

We operate with an emphasis on care, shareholder value and sustainability. We generate revenue from the discovery, commercialisation, processing and sale of gas to South-east Australia, and low-cost Cooper Basin oil production.

Our operations are located in Australia, primarily in the Otway Basin, the Gippsland Basin and the Cooper Basin. This includes involvement in a number of operated and non-operated joint ventures as further detailed below and in our 2022 Annual Report.

We are focused on delivering sustainable growth in total shareholder return through a strategy that requires:

- ▶ due care for health, safety, and the environment and communities in which we operate;
- ▶ focus on energy resources and opportunities possessing the strong economic fundamentals that support generation of leading returns for our shareholders and good commercial outcomes for customers within the foreseeable future; and
- ▶ concentration of effort and resources on opportunities where we have deep knowledge and expertise, principally the Australian basins and the commercialisation of gas.

We are a values-driven business. We strive to think, decide and act at all times in accordance with the Cooper Energy Values, which are: **care, integrity, fairness & respect, transparency, collaboration, awareness and commitment.**



## CARE

Prioritising safety, health, the environment and community.



## INTEGRITY

Striving to be consistent, staying true to our values and accountable for our actions.



## FAIRNESS & RESPECT

Valuing diversity & difference, acting without prejudice, and communicating with courtesy.



## TRANSPARENCY

Being honest, addressing problems, and being clear with our communications.



## COLLABORATION

Sharing ideas and knowledge, encouraging cooperation, listening to our stakeholders, and building long-term relationships.



## AWARENESS

Taking account of all identified key issues in our decisions, and considering future impacts.



## COMMITMENT

Staying focused on the core objectives, making pragmatic, quality technical and commercial decisions, and being decisive with the courage of our convictions.

# Our structure, operations and supply chains

## OUR STRUCTURE

A list of our Group entities is set out in our 2022 Annual Report (see page 132). All Group entities operate under the direction and governance of Cooper Energy.

The role of our Board is to maintain and build Cooper Energy’s capacity to deliver sustainable total shareholder return, in a manner consistent with the Cooper Energy Values including prioritising safety, health, the environment and community. The Board has established and maintains an Audit Committee, a Risk & Sustainability Committee, a People & Remuneration Committee and a Governance & Nomination Committee.

Our management, under the leadership of our Managing Director, is responsible for delivering the strategic plans for Cooper Energy.

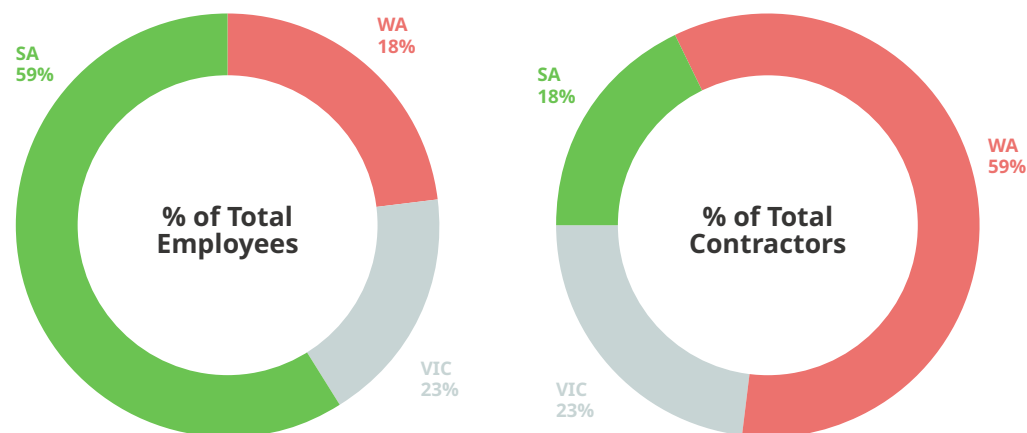
Cooper Energy has implemented a comprehensive management system that details the policies, procedures and guidelines required for the safe, efficient and effective operation of all our activities. This includes our:

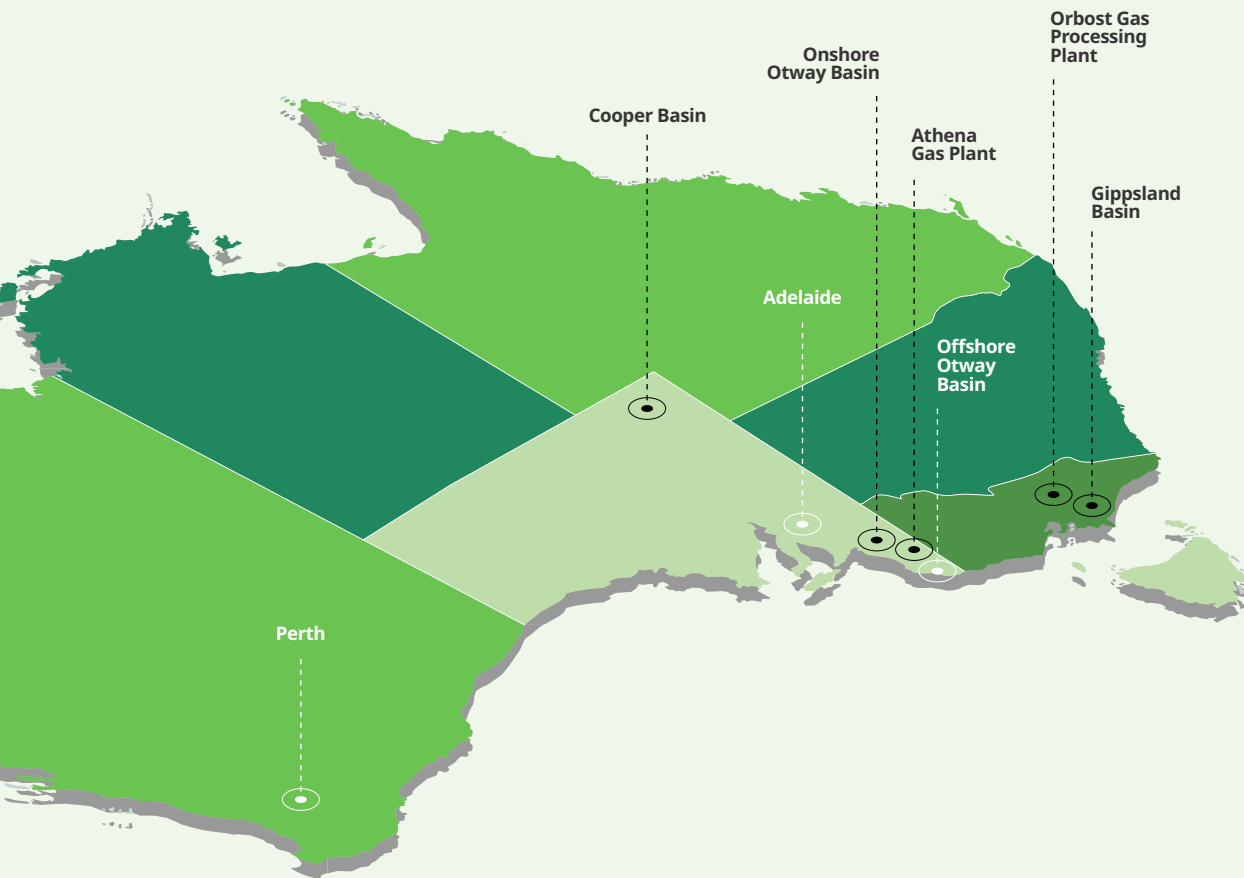
- ▶ **Risk Management Protocol** – Details the approach to risk management across the Group, and how these requirements need to be undertaken and met from a role, planning, implementation and reporting perspective.
- ▶ **Code of Conduct** – Sets out the standards of behavior expected of all Cooper Energy employees, directors, officers, contractors and consultants. Cooper Energy has a range of codes and procedures which underpin its Code of Conduct which are designed to foster and maintain ethical business conduct within Cooper Energy and govern such things as workplace and human resources practices, handling of confidential information, insider trading, risk management and legal compliance.

Our framework of policies, procedures and guidelines provides for compliance with the ASX Corporate Governance principles on corporate governance and for effective management and supervision of the company’s affairs. These documents are published internally, and many are posted publicly [here](#).

Our head office is in Adelaide, and we also have offices in Perth and at the Athena Gas Plant in Port Campbell, Victoria.

As at 30 June 2022, we had 89.9 full time equivalent employees and 13.3 full time equivalent contractors working across our operations. Our employees and contractors are all based within Australia and are split between South Australia, Western Australia and Victoria as follows:





## OUR OPERATIONS

Our operations focus on the discovery, commercialisation, processing and sale of gas to South-east Australia and low-cost Cooper Basin oil production.

Our key activities include:

- ▶ **Gas production:** Cooper Energy supplies gas for domestic and industrial use in South-east Australia from our operations offshore Victoria in the Gippsland Basin (Sole gas field) and Otway Basin (Casino, Henry and Netherby gas fields). In July 2022 Cooper Energy completed the acquisition of the Orbost Gas Processing Plant from the APA Group, which processes the company's gas from the Sole gas field.
- ▶ **Gas project development:** In December 2021 Cooper Energy successfully completed upgrades to, and commissioned, the Athena Gas Plant in Victoria. That plant is now processing gas and liquids from the company's Casino, Henry and Netherby fields in the offshore Otway Basin. Cooper Energy continues to explore opportunities to process low-cost gas from the Otway Basin through this plant, including the potential development of the Annie gas discovery.
- ▶ **Gas supply contracts:** Cooper Energy has a portfolio of gas supply contracts, with customers including AGL Energy, Alinta Energy, EnergyAustralia and VISY.
- ▶ **Gas exploration:** Cooper Energy holds exploration permits and participates in exploration for competitive new sources of gas supply in South-east Australia.
- ▶ **Oil production:** Cooper Energy produces oil from low-cost operations in the Cooper Basin.

Further details of Cooper Energy's operations and interests are available on our [website](#) and in our [2022 Annual Report](#).

## OUR SUPPLY CHAINS

As an oil and gas company, our supply chain includes companies involved with oil and gas field engineering, drilling, construction and technical services, logistics and transportation, specialist consultancies and labour and corporate services. To facilitate our operations, we buy a wide range of products and services including:

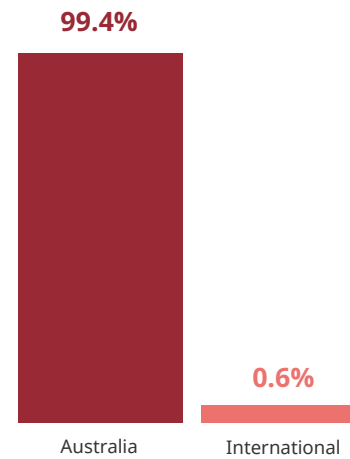
- ▶ drilling, process and development equipment and services, including wellhead and wellsite equipment and services;
- ▶ engineering, construction and technical services;
- ▶ logistical and transportation services;
- ▶ site equipment, management and maintenance services, support services, and civil and construction equipment and services;
- ▶ energy, utilities and consumables; and
- ▶ labour and corporate services including IT, accounting and administrative services.

Our supply chain in FY22 consisted of 429 direct suppliers and a total of AU\$270.5 million in procurement expenditure, of which approximately 99% was paid to suppliers located in Australia and less than 1% to international suppliers.

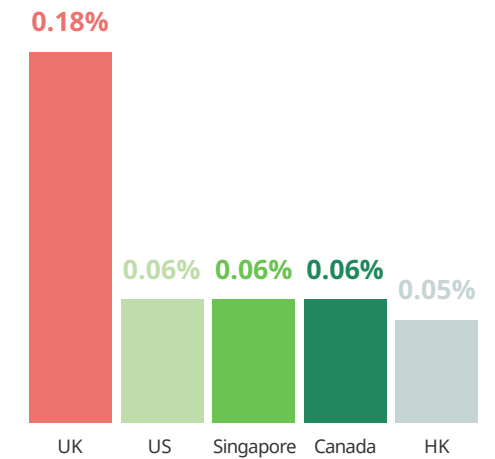
An overview of our direct supply chain and procurement expenditure is on the right:

### Our supply chain in FY22

*Spend by supplier location  
(% of total procurement spend)*



*Top international suppliers by country  
(% of total procurement spend)*



# Our policies and procedures



We are committed to ensuring that Cooper Energy has appropriate frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chains. We have formal policies in place which are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business, including the following:

- ▶ Code of Conduct;
- ▶ Equal Opportunity & Diversity Code;
- ▶ Risk Management Protocol;
- ▶ Anti-bribery & Corruption Code;
- ▶ Whistleblower Policy (and our associated anonymous whistleblower hotline);
- ▶ Health, Safety and Environment Policy;
- ▶ Indigenous and Community Engagement Policy; and
- ▶ Cooper Energy Values.

These documents are published internally, and many are posted publicly on our website.

Our procurement team has risk mitigation and procurement processes and procedures in place relating to the contracting of goods and/or services from external parties. These outline our processes for procuring goods and contracting services from our suppliers, reflect our zero-tolerance stance on illegal or unethical behavior, focus on acting fairly and responsibly, and codify our expectation that care is integrated into our culture at all levels (as set out in more detail in our Code of Conduct).

The above procedural controls are regularly reviewed, including with a focus on ensuring that we have appropriate processes in place to ensure the risk for illegal and unethical business behavior in our business and operations is minimized.



We strive to conduct our business in a manner consistent with the Cooper Energy Values including prioritising safety, health, the environment and community. In relation to human rights risks, we comply with all labour, employment (including the Fair Work Act), immigration and whistleblower laws of Australia, across all states and territories in which we operate.

Consistent with our Code of Conduct, we are committed to:

- ▶ operating with care, prioritising the safety and health of all personnel and the environment and the communities in which Cooper Energy operates;
- ▶ acting honestly and with high standards of personal integrity including treating other personnel with respect;
- ▶ complying with the laws and regulations that apply to Cooper Energy and its operations;
- ▶ not knowingly participating in any illegal or unethical activity; and
- ▶ striving to be good corporate citizens and achieving community respect including by dealing with customers and suppliers fairly.

Our integrated management system has been designed to support the effectiveness of our risk control framework and compliance with our principles, charters, policies, procedures and guidelines. We have continued to focus on mitigating identified and potential modern slavery risks across Cooper Energy operations and supply chains.



## Potential risks in our operations and supply chains

The following risk factors associated with modern slavery informed our risk analysis:

- ▶ **Geographic locations** – Certain countries are associated with a higher risk of modern slavery practices (for example, as listed in the Global Slavery Index).
- ▶ **Industry sector** – Certain industry sectors are deemed higher risk in international and national guidance documentation (for example, as set out in the ACSI guide on Modern Slavery Risks, Rights & Responsibilities, 2019).

- ▶ **Commodity/products** – Certain commodities and products are deemed higher risk in international guidance documentation (for example, as set out in US Department of Labor’s 2022 List of Goods Produced by Child and Forced Labor).

In FY21 our focus was on our largest suppliers by spend. We developed upon this in FY22 by expanding our modern slavery protections and practices into a broader range of our suppliers across our supply chain.



Our operations, procurement spend and supplier profile will continue to inform our risk management processes around modern slavery as we recognize that modern slavery risks are evolving and reflect a continuously changing environment. These areas of potential vulnerability include suppliers in the following industry sectors:

- ▶ maintenance and cleaning services;
- ▶ transport;
- ▶ building and construction services;
- ▶ labour hire; and
- ▶ consumables and materials.

In FY22 we implemented changes to our pre-qualification procedure, including inserting modern slavery clauses into supplier contracts and requiring new suppliers to complete a modern slavery questionnaire before providing services to Cooper Energy. Changes to the pre-qualification procedure have now been incorporated into almost all our supplier contracts, and in FY23 we will finalise this process with any remaining current suppliers. These changes are designed to limit the potential for modern slavery in these higher risk industry sectors.

Within our operations and supply chains, we have been able to identify areas of low risk, for example in operational activities that are directly undertaken by Cooper Energy employees and are covered by our internal processes. We consider the potential for us to directly cause or contribute to incidents of modern slavery to be low.

Almost all of our direct suppliers are located in Australia, and all of our direct international suppliers are in countries which are considered to be low risk for modern slavery practices. We recognise that goods and services provided by our Australian suppliers may come from countries other than Australia. We also recognise that goods and services provided by our direct international suppliers may come from countries other than where those suppliers are domiciled.

# Assessing and addressing the risk of modern slavery practices

In FY21 we completed a risk assessment of our operations and supply chains to identify modern slavery risks. The actions taken to mitigate these risks continued into FY22.

Key additional actions taken to assess and address modern slavery risks in FY22 included:

- ▶ Ongoing training with our Board of Directors and staff, including modern slavery training with the Board of Directors and whistleblower training for staff.
- ▶ Engaging an external ratings agency to provide modern slavery screening for over 250 suppliers.
- ▶ Finalising our supplier pre-qualification procedure, and incorporating modern slavery clauses into supplier contracts and a modern slavery questionnaire into our procurement and tendering process.
- ▶ Engaging with high-risk suppliers on their response to identifying and managing modern slavery risks





## Future commitments

The plan is to continue using the modern slavery indicators around high-risk industry sectors, commodities or products and countries or geographies to assess potential modern slavery risks in our business as part of our commitment to continuously review, improve and develop our modern slavery risk mitigation measures.

In FY23 and beyond, we will continue to strengthen our risk management controls, improve the transparency of our risk profile and collaborate with suppliers where appropriate to address the risks of modern slavery in our operations and supply chain.

We have developed a modern slavery action plan which has the following key areas of focus:

- ▶ **Governance review** – we will continue to review and assess the effectiveness of policies, procedures and guidelines in identifying and minimising modern slavery risks across our business and supply chains.
- ▶ **Awareness and training** – we will continue to provide training to our staff on modern slavery risks.
- ▶ **Supplier engagement** – we will continue to engage with our suppliers in relation to modern slavery risks.
- ▶ **Risk identification** – we will undertake an updated modern slavery risk assessment of our operations and supply chains.
- ▶ **Contracting** – we will incorporate modern slavery clauses into a broader selection of our contracts, including new high-risk or high value contracts. We will continue to incorporate modern slavery questionnaires into our standard new supplier prequalification process.
- ▶ **Promoting reporting & whistleblowing** – we will continue to provide our anonymous whistleblower hotline to allow our internal and external stakeholders (including workers from our contractors and suppliers) to freely raise concerns about any actual or suspected unethical, unlawful or undesirable conduct.

We are committed to continually reviewing and improving our modern slavery risk management initiatives informed by our modern slavery action plan, under the leadership of our Board and executive team.

*This Statement has been approved by the Board of Cooper Energy.*



## DISCLOSURE NOTES

This Statement has been made by Cooper Energy Limited ABN 93 096 170 295 (**Cooper Energy**). This Statement covers Cooper Energy and its controlled entities (as set out on page 132 of the [Cooper Energy 2022 Annual Report](#)).

This Statement is for the reporting period ending 30 June 2022 and has been prepared for the purposes of outlining our approach to ensuring that we have appropriate frameworks and processes in place to minimise modern slavery risks in our business operations and supply chains.

We are involved in a number of operated and non-operated joint ventures. The modern slavery risks and impacts associated with projects which Cooper Energy or its controlled entities do not operate are not included in this Statement. Modern slavery risks and impacts have also not been assessed in jurisdictions where Cooper Energy or its controlled entities have a presence but do not actively operate.

This Statement references significant events occurring after 30 June 2022. Where this Statement contains forward looking statements, including statements of current intention, statements of opinion and predictions as to possible future events, these statements are not statements of fact and there can be no certainty of outcome in relation to the matters to which the statements relate. Forward looking statements involve known and unknown risks, uncertainties, assumptions and other important factors that could cause the actual outcomes to be materially different from the events or results expressed or implied by such statements, and the outcomes are not all within our control. Statements about past performance are not necessarily indicative of future performance.

This Statement was approved by the Board of Cooper Energy Limited on 9 November 2022.

A handwritten signature in blue ink, which appears to read "David P. Maxwell". The signature is written in a cursive, flowing style.

**David Maxwell**  
Managing Director of Cooper Energy Limited