

Equal Opportunity and Diversity Code

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Purpose

At Cooper Energy we believe that decision-making and workplace culture is enhanced through diversity and inclusion.

We value diversity in gender, marital or family status, age, religious beliefs, ethnicity, cultural background, economic circumstance, human capacity, expression of thought and sexual orientation as well as different experiences, skills and capabilities. Through a commitment to inclusion we aim to create a business environment that encourages a range of perspectives and fosters excellence in the creation of security holder value.

Scope

This Code applies to all Cooper Energy employees, directors, contractors and consultants (**Personnel**).

This Code applies at work and to all work-related activities (such as work-related functions). This includes:

- conduct during or outside business hours or on or away from Cooper Energy’s premises, where there is a sufficient connection to the workplace. This includes conduct and behaviour at meetings, work related travel, conferences, seminars, functions (such as work Christmas parties) or training sessions; and
- the use of communication devices and social media during or outside business hours (eg. Facebook), to the extent that these actions impact, or may impact, upon the workplace or on working relationships.

Responsibilities

1. Not only will unlawful discrimination and victimisation not be tolerated by Cooper Energy, it is also unlawful under Federal and State legislation. Bullying or harassment based on a personal characteristic that is protected by equal opportunity laws may amount to unlawful discrimination (refer to Cooper Energy’s **Bullying and Harassment Code**).
2. If a person is subjected to unlawful discrimination or victimisation, that person (complainant) can take action against the person against whom the complaint is made in accordance with Federal and State legislation. Cooper Energy can be found to be vicariously liable for such conduct.
3. Cooper Energy encourages any person who is the subject of, or a witness to, behaviour that may amount to unlawful discrimination or victimisation to come forward and report the matter as soon as possible. This will ensure that Cooper Energy can respond to this type of behaviour promptly. If such conduct is found to have taken place, Cooper Energy will take appropriate action which may include termination of employment or a person’s contract for services.

Requirements

Personnel:

- Have the right to work in a workplace free from unlawful discrimination and victimisation;
- Have a responsibility not to harass, sexually harass or bully other employees or any person in or connected to the workplace, including external parties, based on an attribute that is protected by equal opportunity laws;
- Have a responsibility to take all reasonable steps to eliminate unlawful discrimination and victimisation in the workplace as far as possible;

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- Will be required, so far as is reasonably practicable, to respect confidentiality when participating in an investigation into unlawful discrimination or victimisation;
- Have a responsibility to report any behaviour in breach of this Code and where applicable, assist and cooperate in the investigation of complaints made under this Code;
- Have a responsibility to avoid engaging in gossip about historical matters or matters that are the subject of a current complaint or investigation; and
- Have a responsibility to participate in training provided by Cooper Energy in relation to unlawful discrimination.

Cooper Energy:

- Aims to maintain a supportive, cooperative and productive workplace;
- Has a responsibility to ensure that engagement with external parties is free from unlawful discrimination;
- Where it is deemed appropriate, will investigate complaints of unlawful discrimination and victimisation;
- Will take steps to educate and make Personnel aware of their obligations under this Code, including ongoing monitoring and training in relation to acceptable workplace behaviour; and
- Will provide care and support to any Personnel affected by unlawful discrimination and victimisation, including by using their best endeavours to prevent Personnel who raise an issue or make a complaint from being victimised and taking appropriate action if this occurs.

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1.0 Discrimination

Discrimination is unlawful and is a breach of this Code to discriminate against a person on the basis of a range of attributes or personal characteristics protected by State and Federal legislation (**Attributes**).

These Attributes include:

Age	Lawful sexual activity
Pregnancy and breast feeding	Marital status
Disability/Impairment	Physical features
Employment activity	Political beliefs/activities
Family responsibilities/status as a parent or a carer	Infectious diseases i.e. HIV/AIDS
Gender identity	Race
Industrial activity	Religious beliefs or activities
Sex	Sexual preference/orientation
Personal association with someone who has or is assumed to have one of the attributes listed above	Any other attribute protected under anti-discrimination laws from time to time

Discrimination can be direct or indirect:

- **Direct discrimination** is treating or proposing to treat a person unfavourably because of an Attribute, regardless of the discriminator's motive.
- **Indirect discrimination** is imposing, or intending to impose an unreasonable requirement, condition or practice that has, or is likely to have the effect of disadvantaging persons with an Attribute. It occurs when a requirement, condition or practice, which appears to be neutral, in fact has a disproportionately negative impact on a particular group or individual with an Attribute.

For example, a Manager requires the weekly staff meeting be held at 7am. This appears to be a neutral requirement, however it could indirectly discriminate against employees with family responsibilities because they may not be able to comply with the requirement to attend work at this time. If the 7am meeting time is not a reasonable requirement, then the requirement to attend may constitute indirect discrimination.

2.0 Victimization

Victimization occurs when a Personnel subjects, or threatens to subject, another Personnel to a detriment because that other Personnel has made or been involved in a complaint about unlawful discrimination or has assisted someone else to make such a complaint.

Victimization is unlawful under Federal and State legislation and may result in disciplinary action against the perpetrator, up to and including dismissal or termination of their contract for services.

3.0 Vexatious complaints

Cooper Energy takes all complaints in relation to unlawful discrimination and victimisation very seriously and expects complainants to have a sound basis for allegations they make, and that allegations will be raised in good faith.

If a complainant is found to have made a complaint vexatiously (e.g. where there is no substance to the complaint, where the complaint raises issues that have already been appropriately determined or dealt with or where the complaint is false or malicious), they may be subject to disciplinary action up to and including dismissal or termination of their contract for services.

4.0 Complaints process

If any Personnel considers that they have been subject to unlawful discrimination or victimisation, they are encouraged to make a complaint in accordance with Cooper Energy's **Complaint Resolution Procedure**.

Complaints about breaches of this Code will be dealt with seriously and promptly. Appropriate steps will be taken to ensure that any complaint or investigation remains confidential. Individuals who breach confidentiality requirements may be subjected to disciplinary action, which may include dismissal or termination of a contract for services.

5.0 Compliance with this Code

Strict compliance with this Code by all Personnel is mandatory. Breaches may result in Cooper Energy taking disciplinary action in accordance with its ***Discipline and Poor Performance Policy*** up to and including termination of a person's employment or contract for services.

6.0 External Resources

Personnel may contact one of the external bodies listed below for information or advice, or to lodge a complaint:

- Equal Opportunity Commission (South Australia)
<https://eoc.sa.gov.au/>
1800 188 163
- Australian Human Rights Commission
<https://www.humanrights.gov.au/>
1300 656 419

7.0 Measurable objectives for achieving gender diversity

Cooper Energy is committed to an inclusive workplace that embraces and promotes gender diversity as part of our culture. This involves providing supportive and inclusive workplace policies and practices including in relation to talent management, recruitment practices, pay equity and flexible work arrangements.

More specifically, when approaching recruitment and people development, our practice is to ensure that steps will be taken to assist in the development of a broad and diverse pool of skilled and experienced employees that, will provide each person with the opportunity to develop their career within the company.

Cooper Energy recognises that employees, at all levels, may have domestic responsibilities and we collaborate to adopt flexible work practices that will assist them to meet those responsibilities.

The Board (on recommendation by the People and Remuneration Committee) sets and has published appropriate measurable objectives for achieving gender diversity in the composition of the Board, senior executives and the Cooper Energy workforce generally, which may include gender representation targets.

8.0 Review

This Code will be periodically reviewed to check that it is operating effectively and determine if any changes are required.

External communication in relation to this Code will primarily be undertaken through the Company's Corporate Governance Statement. This Code will be published on the Company's external website.