

# A MESSAGE FROM THE DIRECTORS

## **Operating with integrity**

Our purpose is to help build a better safer and fairer world.

Our decisions and actions are guided our core values .Our Code of Conduct brings these values to life.

It's not just for us. We use our values and Code to drive the best possible outcomes for our customers, staff, shareholders, suppliers and other stakeholders in our business. They guide our relationships with the communities in which we operate all the way through to how we work with our customers and suppliers around the world.



# HOW OUR CODE OF CONDUCT OPERATES AND GUIDES US

Behaviour that consistently demonstrates values cultivates loyalty and trust with each other and our stakeholders.

Our Code guides our daily work and helps us think about not just what we do but how we do it. It demonstrates how to practically apply our values and reflects our requirements, as well as local standards and procedures.

As a company operating and supplying customers around the globe, we comply with applicable laws and regulations of the countries in which we operate. We uphold international standards and guidelines, including our commitment to the United Nations Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights.

We believe operating with integrity is everyone's responsibility. Each section of Our Code explains our principles, our expectations of our workforce and others who work with us. Our Code can't describe or anticipate every situation, but it acts as a guide for our good judgement.



# HEALTH AND SAFETY

We are committed to providing healthy and safe working conditions.

As part of our commitment to health and safety, all workplaces should be free from the use of alcohol and illegal drugs, and the misuse of other substances. The use of cigarettes, including e-cigarettes, must be confined to designated areas.

## Expectations for staff

Health and safety practices are governed by our own requirements which embody prevailing health and safety legislation, the common law and are grounded in common sense rather than tick the box procedures to ensure a safe workplace. All staff and other invitees must adhere to all relevant requirements.

Our leaders are accountable for implementing these requirements and ensuring that supporting systems are in place. Our leaders must provide an environment where everyone feels safe to report any threats to their own safety, or the safety of others.

It is everyone's responsibility to prevent and report workplace-related injuries and illnesses.

As we expect you to be alcohol and drug free, you may be asked to undergo random drug and alcohol testing and you must comply with these requests. You are required to observe all smoking restrictions.

## Expectations for those who work with us

Anyone who visits a Copperhead site must comply with all relevant health and safety procedures so it is important that they understand our procedures before they visit.

All visitors are expected to be alcohol and drug free and might be asked to undergo random alcohol and drug testing. Visitors must also observe all smoking restrictions.

### Ensure Always: to:

- Comply with relevant health and safety requirements and use all necessary personal protective equipment, and help others who work with us to do the same.
- Cooperate with alcohol and drug testing programs.
- Identify, assess and take steps to control health and safety hazards.
- Immediately stop any work that appears unsafe or if the required personal protective equipment is not used.
- Speak to your boss if you have any concerns about your or a colleague's fitness for work or ability to carry out assigned work safely.
- Handle and dispose of all materials properly, safely and lawfully.
- Be prepared for emergencies by making sure you, and any of your visitors, are familiar with emergency procedures.
- Report any accidents, injuries, illnesses, unsafe or unhealthy conditions, incidents, spills or release of materials to the environment to your boss.
- Seek help if you or a colleague may have a drug or alcohol dependency.
- Act on all complaints or warnings raised with you.



# WORKPLACE CULTURE

At Copperhead, we want you to be engaged, able to achieve your potential and be supported by your colleagues and leaders. We don't tolerate sexual harassment, harassment or bullying. Bullies will be dealt with very harshly by Copperhead management.

We will Always: employ, develop and promote based on merit and we do not tolerate any form of unlawful discrimination. Unlawful discrimination against a person based on personal attributes unrelated to job performance, such as race, gender identity, sexual orientation, intersex status, relationship status, religion, political opinion, is prohibited.

We strive to treat all existing and prospective employees fairly and evaluate them fairly.

## **Expectations for staff**

You should Always: strive to be inclusive, collaborative and supportive. You should consider the impact your actions may have on others and treat everyone fairly and with respect.

Always: make yourself aware of relevant cultural considerations and demonstrate respect when working with colleagues from diverse cultural backgrounds or travelling to different locations. It's also important to support your colleagues to speak up if they believe they are experiencing sexual harassment, harassment or bullying. If you witness this behaviour, you have a responsibility to speak up.

## **Defining harassment, sexual harassment and bullying.**

Harassment is an action or behaviour that would be reasonably viewed as humiliating, intimidating or offensive.

Sexual harassment is an unwelcome sexual advance or unwelcome conduct of a sexual nature, unwelcome requests for sexual favours or other unwelcome conduct of a sexual nature which may make a person feel offended, humiliated or intimidated. It may include unwelcome touching, suggestive insults of a sexual nature, sensual acts of a sexual nature, or sending sexually explicit emails or messages. The impact of the action or behaviour on the recipient, not the intent, is considered when determining whether the action or behaviour is harassment.

Sexual harassment is not Always: obvious, repeated or continuous. Whilst bullying is characterised by repeated behaviour, sexual harassment can be a one-off incident.

Bullying is repeated unreasonable behaviour directed towards a worker (or group of workers) that creates a risk to health and safety. Unreasonable behaviour is behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating, offensive or threatening.

Bullying is most often found where the bully has a position of power, strength or influence over the victim such that the victim fears for their safety and well being and also feels unable to fight back or complain.

People found bullying others will be dealt with quickly and harshly by Copperhead management.





# RESPECTING HUMAN RIGHTS

We commit to operating in a manner consistent with international human rights.

We must respect, and work to, uphold and advance human rights in everything that we do. We acknowledge that our activities have the potential to impact human rights and we manage this through our core business practices. This includes consideration of workplace health, safety and labour conditions, activities of security forces, land and water access and use, impacts on the rights and wellbeing of Indigenous peoples and other communities that live near our operations, resettlement and local community programs.

In all our dealings, we aim to build mutually beneficial relationships with all stakeholders potentially impacted by our operations, including employees, contractors and members of local communities.

## Expectations for staff

As part of risk management, you must identify any risks to human rights that may arise through business activities, functions and processes and to mitigate, or wherever possible eliminate, such risks.

You should never threaten, punish or take disciplinary or retaliatory action against anyone, inside or outside of Copperhead, for raising or helping to address a human rights concern.

## Indigenous peoples

We recognise the traditional rights of Indigenous peoples and acknowledge their right to maintain their culture, identity, traditions and customs. You should exercise cultural sensitivity and recognise and respect sites, places, structures and objects that are culturally or traditionally significant.

In relation to plantation operations or other projects that are located on lands traditionally owned by, or under customary use of, Indigenous peoples, comply with all local laws and consult with the indigenous leaders relevant to that land.

## Grievance mechanisms and remedy

For any adverse human rights impacts that may be caused, or contributed to by Copperhead, contact your local Copperhead office for information about the complaints and grievance process.

## Expectations for those who work with us

We expect our suppliers to apply our human rights related zero tolerance requirements in relation to child labour, inhumane treatment of employees, forced or compulsory labour, non-discrimination and diversity, freedom of association, living wage, workplace health and safety and community interaction.

We encourage our non-operated joint ventures and minority interests to adopt similar principles and standards to Copperhead's.

## Always:

- Consider the human rights implications of Company activities.
- Identify and address human rights risks and adverse impacts from the perspective of the person who holds the right.
- Undertake due diligence on our suppliers to assess their alignment with human rights.
- Ensure human rights concerns and complaints are investigated and remedied, if appropriate, and the



outcomes are reported to relevant stakeholders.

## SUPPORTING COMMUNITIES

We play an important role in developing economies and improving standards of living. As part of making a valuable contribution as community partners, we seek meaningful long-term relationships that respect local cultures and create lasting benefits.

### **Expectations for staff**

If you are responsible for working with our community stakeholders, community development projects or donations, you must undertake appropriate due diligence and obtain pre-approval before engaging any partner or agency to implement a program.

Use social data and research to make sure the diversity of our stakeholders is understood, including those who may be disadvantaged and vulnerable. You should engage regularly, openly and honestly with people impacted by our operations and take their views into account during decision making.

Where you engage with Indigenous peoples from a local community, you must be aware of the Copperhead Indigenous Peoples Strategy and undertake cultural awareness training.

### **Expectations for those who work with us**

When working on behalf of Copperhead and local communities, we expect the same level of respect in your interactions. You must familiarise yourself with all Copperhead requirements when dealing with local communities.

### **Always:**

- Respect the cultures and customs of the communities and countries in which we operate, as long as they don't conflict with Our Code or the law.
- Take the views and expectations of all stakeholders into account in decision making.
- Investigate concerns and complaints and report outcomes back to relevant stakeholders.
- Accurately and truthfully disclose the nature and purpose of funding requests, the risk profile associated with funding and any possible conflicts of interest that may exist.
- Ensure when committing to a community development project or donation:
  - There are clear and distinguishable obligations and key performance indicators in any agreement;
  - There are appropriate governance arrangements and contractual protections in place;
  - The contributions do not inappropriately benefit any government official or close relative of a government official;
  - The community development project or donation is authorised by the Directors.



# ENVIRONMENT

We all need to demonstrate our environmental responsibility by understanding and minimising impacts and contributing to lasting environmental benefits at every stage of our operations.

Our approach to environmental management is based on the identification, assessment and control of risks across all phases of our business

## Expectations for staff

You must understand the potential environmental impacts of the tasks you perform and look at ways you can avoid, minimise and rehabilitate impacts to air, water, land and biodiversity, including greenhouse gas emissions. Where actual or potential environmental incidents or spills occur you must report these, regardless of severity. If residual environmental impacts remain to important biodiversity and ecosystems, you must bring these to the attention of the Directors so they can make adequate compensatory decisions.

## Expectations for those who work with us

Those who work with us must comply with our environmental requirements.

### Always:

- Identify, assess and take steps to avoid and minimise environmental impacts associated with your work.
- Identify and report opportunities to reduce greenhouse gas emissions, including improving energy efficiency.
- Identify and report opportunities to improve water management, including water efficiency and minimising pollution.
- Immediately stop any work that may contribute to a significant environmental or community incident.
- Report to your boss any actual or potential impact to the environment or communities from an accident, incident, spill or release of material.
- Encourage our suppliers, joint venture partners, customers and other third parties to minimise their environmental impacts.

# TRAVELLING FOR BUSINESS

Our goal is to ensure the health, safety and wellbeing of our employees when travelling for Copperhead purposes.

When travelling for business, or if your job involves business dealings with other countries, you should Always: respect the laws and customs of those countries. You must ensure that your behaviour Always: reflects positively on your own reputation and the reputation of Copperhead.

A business trip can be extended for personal travel, providing this is approved by your boss in advance of the trip. Personal travel, other than as extensions to business trips, must not be booked through Copperhead's designated travel provider or charged to Copperhead corporate charge cards. Frequent flyer program benefits may be used by employees for personal travel.



## Expectations for staff

Before you travel, you should understand the associated safety, security and health risks and follow local pre-approval requirements. Make sure you follow any vaccination or other travel medicine recommendations, and note the security risk rating of your planned destinations.

You must never accept offers of sponsored travel or accommodation. If there is a valid business purpose for attending an event, Copperhead will pay any travel and accommodation costs.

### Always:

- Have your travel approved before you leave.
- Use Copperhead's contracted travel provider for all business travel bookings.
- Prepare for international travel by seeking destination-specific health and safety advice.
- Claim only legitimate business expenses that are supported by receipts or tax invoices.
- Comply with global immigration rules when travelling internationally, and ensure that employees who report to you also comply.
- Familiarise yourself with local behaviours, practices and customs, and be sensitive to actions or behaviours that may be acceptable in one culture but not in others.

## CARING ABOUT SOCIETY

Our people are our most important resource and are key to Copperhead's success. We aim to provide a healthy, safe and inclusive workplace, free from harassment and bullying. We want all of our people to be treated fairly, respectfully and with dignity and feel safe to speak up.

## WORKING WITH OTHERS

We recognise our relationships with others are essential to our success. Every day we interact with suppliers (including vendors, contractors and consultants), customers, community partners, and governments.

Our Code helps us build respectful relationships with our external partners and stakeholders

## WORKING WITH GOVERNMENTS

Our ability to conduct business is directly affected by government decision making, so it's important we have open and constructive relationships with them.

We regularly share information and opinions with governments on issues that affect our operations and our industry. This exchange of information and opinions enables informed decision making by both governments and our Company.

### Expectations of our staff

You need to maintain honest relationships with governments and their agencies, officials and personnel.

It is important that our engagement with government is consistent and aligned with company policy. If you are engaging with government on matters other than of a routine regulatory nature, you must speak with the Directors before proceeding and must obtain Directors' approval before any submissions to government on







behalf of the Company are made. This includes responses to government inquiries and submissions or papers on proposed legislative reforms.

All information provided to governments and third parties on behalf of the Company must be accurate and appropriate for the purpose.

## Government events and political activities

You may be able to participate in events or activities organised by a political party, politician, elected official or candidate for public office if your involvement is for business, related to policy briefing, and the activity is supported by the Directors. Events or activities cannot be related to political fundraising.

Activities that require registration and approval in advance include:

- Payment for tables at functions or events with a clear business purpose which are sponsored by, or associated with, any political party, politician or political candidate;
- Sponsoring research by 'think tanks' affiliated or linked to political parties;
- Involvement with any event organised by, or on behalf, of a political party for which a fee is paid and is not related to, or perceived as, political fundraising.

We recognise employees' rights and respect their choices to participate as individuals in the political process provided you make it clear that you are not representing Copperhead.

You must notify your boss if you intend to pursue political office as soon as you decide and document this in writing. You will need to apply for leave if you are running for office. You will also need to apply for leave if you are carrying out the duties of public office during normal working hours.

You may need to resign from your position at Copperhead if you win your candidacy.

Participation, including your time and money, must be made on your own account and your political opinions must not be presented as being those of our Company. You won't be able to use any information or Copperhead resources that you have had access to in your role or via your employment during your involvement in the political process. Similarly, you can't access Copperhead support in any form while running for office or carrying out activities of public office.

## Expectations for those who work with us

When you work with Copperhead please make sure you are familiar with our requirements for engaging with governments. If you are conducting business on behalf of Copperhead you must not jeopardise any of our government relationships. Ask your primary contact for more information about how we work with governments.

### Always:

- Talk to the Directors before you engage with government officials on public policy or issues that could impact Copperhead's reputation or licence to operate.
- Be truthful, accurate and cooperative when dealing with government officials.
- Comply with all applicable laws and regulations.
- Consider potential corruption risks when dealing with government officials.
- Seek approval for involvement in any business-related event or activity organised by, or on behalf of, a political party or candidate and be transparent when undertaking such activities.



- Discuss with your boss and advise in writing if you plan to seek or accept a role in public office.

## ANTI-CORRUPTION

Our commitment to operating with integrity is part of who we are and what we do every day. We prohibit bribery and corruption in all our business.

How we go about our business matters. Corruption misallocates resources, reinforces poverty, undermines the integrity of government and community decision making, and results in waste of the opportunities that arise from resource development.

Compliance with anti-corruption laws is essential to protect Copperhead's reputation and to preserve our licence to operate. All our employees, contractors, and directors (executive and non-executive), and third parties we deal with, including our suppliers, are required to comply with anti-corruption laws. No one has the authority to waive this requirement. Criminal penalties could result where anti-corruption laws are not respected.

Any concerns regarding corruption must be reported immediately.

### Expectations for staff

You must not authorise, offer, give or promise anything of value, directly or indirectly (for example, through a third party), to anyone to influence them in their role, or to encourage them to perform their work disloyally or improperly.

You should never make facilitation payments which are payments to government officials for routine services that are legally available. However, a payment made in the face of a threat to the health or safety of a person is not a facilitation payment.

### You must get pre-approval before:

- Offering anything of value to an external person;
- Engaging a supplier who will interact with others on our behalf;
- Offering to undertake a community donation or project;
- Offering to sponsor an event.
- When you offer or provide anything of value to an external person, the item must:
  - o Only be offered or provided for a legitimate business purpose;
  - o Not be offered or provided to improperly influence or reward action;
  - o Be legal under local laws;
  - o Be of appropriate value and nature considering local customs and law, the position of the recipient and the circumstances;
  - o Not be capable of causing reputational damage to Copperhead.

### Expectations for those who work with us

We expect everyone who works with us to share our commitment to integrity in all business dealings and in providing services to us.

### Always:

- Record all transactions accurately and in reasonable detail to reflect their true nature.
- Understand the role and interests of the person who you are dealing with.





- Provide accurate and complete information when seeking pre-approval.
- Get pre-approval before offering or giving anything of value, a commercial sponsorship or a community donation or project.
- Act in the best interests of your health and safety.
- Immediately report any corruption concerns.

## SUPPLIER RELATIONSHIPS

Relationships with suppliers (including vendors, contractors and consultants) make a significant contribution to the success of our Company, and we want to make sure our suppliers have strong values and standards of behaviour. We value our relationships with suppliers, and aim to have an effective and streamlined supply process.

Suppliers who act illegally or unethically can affect our financial performance and profitability, significantly impact our reputation and potentially expose our Company and our employees to criminal or civil penalties. To avoid this, we seek to work with suppliers who are willing to adhere to similar values as our own.

We take great care to use a fair and equitable procurement process. Our selection process aims to clearly inform potential suppliers of our expectations and standards and the requirements applicable to them.

### Expectations for staff

You should Always: be careful when choosing a supplier and encourage them to uphold our standards and contribute positively to our reputation and ensure there is no conflict of interest( see below for Conflict of Interest)

Only seek suppliers who share our commitment to:

- Lawful business practices;
- High standards of business conduct;
- Management practices that respect the rights of all employees and local communities;
- Minimising impacts on the environment; and
- Providing a safe and healthy workplace.

You should conduct a health and safety risk assessment before any sourcing process and make sure commercial decisions do not compromise health and safety. If there is any doubt about the supplier, or potential supplier's, integrity or ability to perform the contract, you should address these issues immediately.

All procurement decisions should be based on the best value received, taking into account factors such as safety, price, quality, performance, history and suitability to meet Copperhead standards. You should be satisfied that the supplier is reputable, competent and qualified to perform the work for which they are being hired, that they will operate safely and ethically, and that the compensation sought is reasonable.

You need to take steps to monitor and assess the supplier's performance. This will require, at a minimum, carefully checking invoices and raising queries with the supplier about any unclear or apparently excessive charges. Always: tell suppliers where they can access Our Code so that they understand our expectations of them.



## Always: \

- Seek to obtain at least 3 competitive bids for all outsourced contracts.
- Obtain the following before entering into a contract or commitment with a supplier:
  - o An appropriate risk assessment and commercial review, including an assessment of the potential supplier's health, safety, environment and community performance, reputation, conduct, integrity, qualifications and experience, creditworthiness and ability to meet Copperhead standards;
  - o All appropriate internal approvals;
  - o Pre-approval to engage suppliers without competitive bids is only available from the Directors.
- Make sure suppliers are reputable, competent and qualified to perform the work, and that the compensation sought is reasonable.
- Award business based on merit, qualifications and experience using objective selection and evaluation criteria.
- Make sure a valid purchase order has been received by the vendor before they start work or provide goods or services.
- Help our suppliers understand and follow Our Code. If they use subcontractors who will do work for us, ensure they too understand Our Code.
- Make sure that agreements clearly state the services or products to be provided, the basis for earning payment and the rate or fee.
- Conduct regular reviews of supplier relationships and performance.
- Verify that invoices clearly and fairly represent goods and services provided. Raise queries about unclear or apparently excessive charges.
- Make payments only to the person or organisation that actually provides the goods or services.
- Speak up about any activity by a supplier that is inconsistent with Our Code.

## CONFLICTS OF INTEREST

In line with our commitment to integrity, we must Always: be able to demonstrate that all decisions have been made in the best interests of Copperhead and free from personal bias. This means that we need to manage any actual, perceived or potential conflicts of interest.

A conflict of interest arises when an employee's position within the Company and their financial, or other personal interests affect, could affect, or have the appearance of affecting, their judgement, objectivity or independence.

Common examples of actual, perceived or potential conflicts of interest include:

- Pursuing, awarding or maintaining Copperhead business opportunities for personal gain or the benefit of close relatives or friends;
- Holding outside jobs or affiliations, including directorships;
- Holding investments directly or indirectly in businesses or assets that are contracted to do business for or on behalf of Copperhead;
- Receiving money, property, services or other forms of financial personal benefits from suppliers or other third parties doing, or proposing to do, business with Copperhead;
- Influencing the results of a bid or tender;
- Offering jobs or affiliations to close relatives or friends;



- Offering or accepting more than a modest amount of gifts, hospitality and entertainment;
- Accepting sponsorships from providers or third parties who are involved at your site or in your area of business.
- Gifts, hospitality or entertainment should only be accepted if they are occasional and of modest value. Determining what is 'occasional and modest' is a matter of judgement.

### **Expectations for staff**

Nothing you do, professionally or privately, should conflict with your responsibilities to Copperhead, compromise the quality of your work performance or jeopardise your ability to make impartial business decisions in Copperhead's best interest as outlined in Our Requirements for Business Conduct.

You should avoid business dealings and personal relationships that could cause conflicts of interest unless the conflict is reported to the Directors and in your opinion is still in the best interests of Copperhead. Remember, some relationships can create the appearance of a conflict, even if you don't think there is one. Conflicts may arise during the course of a normal business relationship due to a change in circumstances.

You should excuse yourself from any decision making and ongoing oversight process where you have an interest that influences, or could be perceived to influence, your ability to make objective decisions for our Company. This is important as an unmanaged conflict of interest could encourage unethical behaviour and lead to fraud.

You should never ask for gifts, hospitality or entertainment of any kind from anyone we conduct business with, including suppliers, customers, community partners or governments.

You should reject offers of travel and accommodation from external parties. If there is a valid business purpose to attend an event or function, Copperhead will pay for travel and/or accommodation costs.

Report all actual, potential or perceived conflicts of interest to the Directors.

### **As a leader of someone who has an actual, potential or perceived conflict of interest, you need to:**

- Ensure the conflict is reported to the Directors and the details are documented in the Conflicts Register;
- Agree, document and implement an appropriate course of action that removes or manages the conflict;
- Monitor and regularly validate adherence to the agreed course of action;
- Adjust the documented course of action as required.

### **Expectations of those who work with us**

When you work with Copperhead, we expect you to respect our employee's obligations to operate free from bias. You should never put our employees in a position where they have, or could appear to have, a conflict of interest.

### **Always:**

- Conduct business in a professional, impartial and competitive manner.



- Avoid business dealings and personal relationships that could cause, or create the appearance of, a conflict of interest.
- Advise your boss of any outside activities, financial interests or relationships that could be seen as a conflict of interest. Excuse yourself from any associated decision making and ensure there is a documented course of action in place.
- Get appropriate approval from the Directors before accepting an officer or director position with another organisation.
- Use good judgement when deciding to accept gifts, hospitality and entertainment.
- Excuse yourself from any decision making process where you have an interest that could influence your ability to make an objective decision.
- Refrain from investing in a known competitor, customer or supplier of Copperhead.

## COMPETITION

We support competition and do not engage in anti-competitive behaviour. We are committed to full compliance with competition laws; active engagement and cooperation with competition authorities; and the enforcement of competition laws against third parties who act in an anti-competitive manner towards Copperhead.

Most countries where we operate have developed competition laws, also known as antitrust or anti-monopoly laws. These laws are designed to stop a range of practices that restrain trade or restrict free and fair competition, such as price fixing, market sharing, bid rigging or abuses of a dominant position.

Breach of competition laws can result in serious consequences for the Company and our employees, including fines and imprisonment. We regard any breach of competition laws as a serious breach of Our Code which may lead to disciplinary action.

### **Expectations for staff**

In all dealings with Copperhead's competitors (including competing joint venture partners), customers, suppliers, you must conduct yourself in a manner that does not breach, or appear to breach, competition laws.

You must not:

- exchange competitively sensitive information, directly or indirectly, with a competitor;
- engage in any inappropriate contact initiated by a competitor;
- ignore a complaint if one is made about the competitive behaviour of Copperhead;
- ignore an incident if you believe a third party is acting in an anti-competitive manner towards Copperhead;

Where Copperhead is the victim of anti-competitive behaviour, it can lead to unnecessary additional costs for the Company (for example, through paying higher prices to suppliers who have engaged in bid rigging) and reduced productivity (for example, where supplies of a product used by Copperhead are being collectively limited by our suppliers).

If you suspect anti-competitive behaviour by an employee, contractor or third party, you must report it immediately.



## Expectations of those who work with us

Anyone who works with us is expected to comply with competition laws in respect to all interactions both with and on behalf of Copperhead.

Maintain Copperhead's independence in dealings with third parties, including in relation to pricing, marketing and selling.

### Always:

- Consider the appearance and implications of interacting with a competitor, whether in a business or personal setting.
- Avoid any action which could imply illegal coordination with competitors.
- Ensure that written communications are clear and accurately record events and communications with competitors..

## TRADE CONTROLS

Our business involves international trade. We respect the international trade laws that govern these transactions and comply with all applicable export controls and sanctions.

Governments implement trade control laws to support their foreign policy and national security objectives. If we are involved in a transaction that breaches these laws, it may expose us and our employees to criminal penalties and cause significant damage to our reputation. These laws include trade sanctions, export controls and anti-boycott laws.

### Expectations for staff

Copperhead screens suppliers and customers to block transactions with Australian Government and United Nations sanctioned countries and sanctioned parties. If you are involved in potential international transactions or may interact with individuals or entities who are subject to sanctions, you need to comply with our screening procedures and report this pending transaction to the Directors.

## Expectations of those who work with us

When you work on behalf of Copperhead, we expect that you will respect all international trade laws of the countries in which we operate.

### Always:

- Make sure that accurate and complete information is provided to government authorities, including on import and export declarations.
- Know your counterparty to the best of your ability.
- Understand the routes that are being used to transfer information, goods and services between locations, and identify borders that are being crossed.
- Understand whether your counterparty is on-selling goods and get assurances to avoid on-selling to a sanctioned party.
- Understand whether your counterparty is using Copperhead products to produce goods destined for a sanctioned party or country – your counterparty may not be subject to the same sanctions programs.
- Get the necessary approvals and licenses before proceeding with a transaction.
- Understand whether your nationality or citizenship affects your ability to be involved in an international



transaction.

## PROTECTING OUR COMPANY

We all have an obligation to protect Copperhead's property. This includes equipment, inventory, technology, money, intellectual property, company information and data. We also need to make sure that we use our assets for the purpose for which they are intended.

We are Always: increasing our cybersecurity awareness, and we are vigilant to online threats including viruses, malware and suspicious emails. We need to make sure we are accurate when collecting, collating, entering and presenting data.

## PROTECTING OUR ASSETS

We all have an obligation to protect the Company's assets, look after them carefully as though they were your own, and use them for their intended purpose.

Assets include physical and non-physical property, such as equipment, inventory, technology, money, intellectual property (IP) and Company information and data. Competitively sensitive and proprietary information are also considered assets and include:

- Operational data, such as production and maintenance data, master data and data related to our equipment, sensors and process control systems;
- Strategic and marketing plans;
- Information used in trading activities;
- Research and other technical data.

### Expectations for staff

You are responsible for appropriately and carefully using and safeguarding Copperhead's assets. You are also expected to respect both the physical and non-physical assets of others, and never knowingly damage or misappropriate those assets.

You should never share sensitive Company information without authorisation from your line leader. If you're not sure what you can share, ask Ethics & Compliance or Legal.

You should do what you can to prevent theft, misappropriation, damage or misuse of any of our assets. This includes not allowing physical assets to be destroyed, disposed of, sold, loaned or donated without appropriate approvals.

We are all responsible for protecting Copperhead's assets and this includes preventing and detecting fraud. Fraud is any intentional act of deception which is undertaken for personal or third party gain and which may result in loss to Copperhead or another party. Examples include false statements, obtaining a personal commission for awarding work, falsification of expense claims, misuse of Copperhead information or theft.







## Expectations of those who work with us

We expect those who work with us to protect and not misuse our assets. If there is any uncertainty about the use of a Copperhead asset, please ask your boss.

### Always:

- Use our assets carefully and for their intended purpose.
- Protect our assets from waste, damage, misuse, loss, fraud and theft.
- Report any potential waste, damage, misuse, loss, fraud or theft of our assets.
- Prevent non-authorised personnel from accessing our facilities, information, data or other assets, where possible.

# TRUTHFUL REPORTING

We need to be truthful in all our reporting to make sure we maintain the trust of our stakeholders and our social licence to operate.

All data we create and maintain must accurately reflect the underlying transactions and events. There is never a justification for falsifying records, misrepresenting facts or engaging in any other fraudulent behaviour.

All financial transactions must be evidenced by appropriate source documents, verified for their validity and accuracy, properly authorised and accurately and completely recorded in the relevant accounts, systems and records. This includes, but is not limited to, bid and tender evaluation records, purchase orders, maintenance reports, receiving documents, invoices, travel and expense records, journal entries, timesheets and tax filings.

## Expectations for staff

If you are responsible for reporting information, whether financial or non-financial, you must make sure there are adequate internal controls to achieve truthful, accurate, complete, consistent, timely and understandable reports.

You should only report accurate data and information regarding Copperhead or its business activities.

You need to understand and comply with all applicable financial, regulatory and other applicable reporting requirements, laws and regulations in the relevant jurisdiction.

If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information, you must report it immediately to your boss.

## Expectations of those who work with us

If you are responsible for reporting on behalf of Copperhead, we expect that the reports and information are transparent and reflect the underlying transactions and events as outlined in this section.

### Always:

- Cooperate with our internal and external auditors and disclose all pertinent information that could reasonably impact the results of an audit.
- Report any actual or suspected irregularities or weaknesses in relation to internal controls, accounting or reporting.
- Speak up immediately about any suspicions of fraud.





- Keep accurate, complete and true Company books, records, accounts, documentation and reports in accordance with applicable laws, regulations, standards and procedures.
- Protect Copperhead records from unauthorised access, change, dissemination or destruction.
- Accurately record work time relating to Copperhead and all leave taken.
- Make sure no undisclosed or unrecorded account, fund or asset is established or maintained.
- Make sure you only submit and approve legitimate and reasonable expenses that are supported by valid receipts and invoices.
- Return or transfer the custody of all relevant business records if you change your job within the Company or if you leave Copperhead. Do not keep personal copies.

## SHARING INFORMATION

When you work at Copperhead you may have access to sensitive information. This includes production information, business opportunities and financial results. We all need to make sure that we protect and respect Company and personal information and the privacy of others in accordance with Our Code and applicable laws.

## COMMUNICATING EXTERNALLY

We Always: need to consider Our Charter values and our Code when communicating about or on behalf of Copperhead.

Any public communication that can be attributed to Copperhead must be first approved by the Directors.

### **Our expectations of you**

When you communicate externally for, on behalf of, or about Copperhead, you should Always: act in accordance with Our Charter values and Our Code.

### **Expectations of those who work with us**

This section applies equally to those who work with us. If you have any questions or need further information please speak to your primary contact.

### **What should I consider?**

If you are active on social media, please use your common sense and judgment and consider the following:

- Is my activity in line with Our Charter values and Our Code?
- Is my activity appropriate, given my role at Copperhead? If your role or your interactions with external parties mean you could be perceived as a Copperhead spokesperson, it's best to state the views are your own not Copperhead's.
- Are my comments accurate and not misleading?
- Is the information sensitive or confidential? Could I be putting Copperhead or myself at risk if this information became public? Would I be comfortable if the media republished this information

### **Always:**

- Follow the rules relating to who can make public statements on behalf of Copperhead.
- Ensure all public communication is complete, fair, accurate, timely and clear.
- Obtain all relevant approvals prior to publicly releasing material on behalf of Copperhead..
- Report the loss or theft of Copperhead information (for example, your computer or briefcase) to your boss immediately.



- Advise your boss if you are attending an informal external event, such as a trade meeting or professional networking event.
- Get approval from the Directors to present an external speech or participate in an external panel discussion.

## PERSONAL INFORMATION AND PRIVACY

We respect your personal information and privacy, and expect you to respect the personal information and privacy of others.

Personal information is any information which could identify an individual, either from that information alone or in combination with other information which is reasonably likely to come into the possession of Copperhead.

To the extent permitted by law, we reserve the right to monitor or audit employee use of Copperhead information systems, and access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet a legal or policy requirement.

### **Expectations for staff**

It's important you follow our standards and procedures on personal information and privacy.

You should only collect, use, disclose, retain or process personal information that is necessary to meet business requirements, as permitted by law in places where we operate. If you do not want others to read an email, you should reconsider sending it. If an email relates to a personal matter you should use a personal account.

Always: treat the personal information and privacy of others with respect.

### **Expectations of those who work with us**

If you work with us, you must uphold our standards and respect the personal information and privacy of our employees while you are working with us

### **Always::**

- Collect personal information directly from the individual where reasonable and practical.
- Comply with legal requirements that apply to the collection, use, disclosure, retention and processing of personal information.
- Only collect, use, disclose, retain and process personal information that is necessary for legitimate business activities and functions.
- Use personal information in a way that is consistent and compatible with the purpose for which it was collected, unless otherwise approved by the relevant individual.
- Use safeguards to help protect personal information against loss, destruction, unauthorised access, or the use, modification or disclosure of personal information.
- Maintain the accuracy of your personal information.
- Check the legal requirements about personal information applicable to your region.

