



Subject to review and registration on the Modern Slavery Register

2024 Modern Slavery Statement



Highlights

FY24

Undertook annual review of Amplitude Energy policies, procedures and guidelines

Ongoing use of an external ratings agency to screen the modern slavery practices of suppliers

Ongoing use of supplier prequalification procedure

Modern slavery clauses used in all new supplier contracts

Continued engagement with high-risk suppliers on identification and management of modern slavery risks

Ensuring due diligence is conducted for modern slavery risks, where relevant, in tenders undertaken during FY24

Regular review and continuous improvement of our risk-related policies and governance control measures

Continued provision of our anonymous whistleblower hotline

FY25 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

Board training on modern slavery risks planned

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 Amplitude Energy Limited (formerly Cooper Energy Limited) under the Modern Slavery Act 2018 (Cth) (Act) for the financial year ending 30 June 2024 (FY24). This Statement covers the activities of Amplitude 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 labour;
- forced marriage;
- debt bondage;
- child labour; and
- deceptive recruiting for labour or services.

Amplitude Energy recognises that slavery and human trafficking can occur in many forms and is committed to protecting human rights across all areas where our business operates.

The purpose of this Statement is to outline Amplitude Energy's approach to ensuring that appropriate frameworks and processes are 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 Amplitude Energy Values.





About Amplitude Energy

Amplitude Energy is an ASX (ASX:AEL) listed energy company proudly playing our part in Australia’s energy future.

We are proud to explore, develop and produce domestic gas for Australians to deliver shareholder value, support energy security and contribute to the wealth of our nation. Our operations are located in Australia, in the Otway Basin, the Gippsland Basin and the Cooper Basin. This includes a number of operated and non-operated joint ventures as further detailed below and in our [2024 Annual Report](#).

Amplitude Energy is focused on playing a crucial role in Australia’s energy future by building on its core business of producing domestic gas for Australian customers. Our strategy aligns with the Australian Government’s Future Gas Strategy, which underscores the importance of gas in ensuring energy security, reliability and affordability, and supports the broader energy transition.

At Amplitude Energy, we are committed to delivering gas to Australian consumers, including industrial manufacturers and major energy generators and retailers. Our strategy leverages our offshore and onshore infrastructure across Victoria, where the industry and community have coexisted for decades.

Our structure, operations and supply chains

Our structure

A list of our Group entities is set out in our [2024 Annual Report](#) (see page 131). All Group entities operate under the direction and governance of Amplitude Energy.

The role of our Board is to maintain and build Amplitude Energy's capacity to deliver sustainable total shareholder return, in a manner consistent with the Amplitude Energy Values. 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 & CEO, is responsible for delivering the strategic plans for Amplitude Energy.

Amplitude 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 behaviour expected of all Amplitude Energy employees, directors, officers, contractors and consultants. Amplitude 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 Amplitude 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 Council Principles and Recommendations 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 Melbourne and operate the Athena Gas Plant in Port Campbell, Victoria, and the Orbost Gas Processing Plant in the Gippsland region, Victoria.

As at 30 June 2024, we had 125.7 full time equivalent employees and 13.4 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:

% of Total Employees



Location

- 45% South Australia
- 10% Western Australia
- 45% Victoria

% of Total Contractors



Location

- 27% South Australia
- 48% Western Australia
- 25% Victoria

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

Amplitude 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).

Gas project development

Amplitude Energy continues to explore opportunities to process low-cost gas from the Otway Basin through the Athena Gas Plant, including the potential development of the Annie gas discovery, and from the Gippsland Basin through the Orbost Gas Processing Plant.

Gas supply contracts

Amplitude Energy has a portfolio of gas supply contracts, with customers including AGL Energy, Alinta Energy, Energy Australia and VISY.

Gas exploration

Amplitude Energy holds exploration permits and participates in exploration for competitive new sources of gas supply in South-east Australia.

Oil production

Amplitude Energy produces oil from low-cost operations in the Cooper Basin.

Further details of Amplitude Energy’s operations and interests are available on our [website](#) and in our [2024 Annual Report](#).

Our supply chains

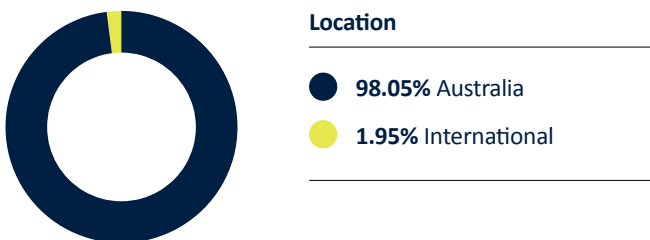
As a gas and oil company, our supply chain includes companies involved with gas and oil field engineering, drilling, construction and technical services, logistics and transportation, specialist consultancies and labour and corporate services. To facilitate our operations, we buy a wide range of products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

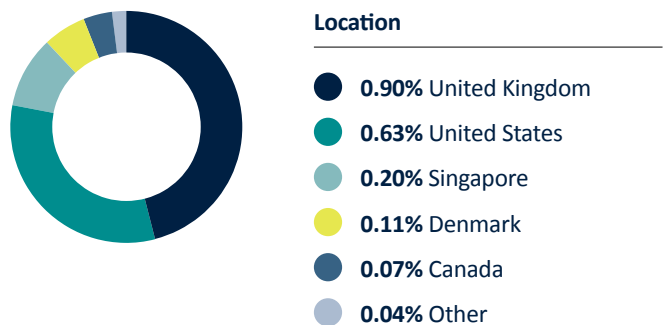
Our supply chain in FY24 consisted of 558 direct suppliers and a total of AU\$397.6 million in procurement expenditure, of which over 98% was paid to suppliers located in Australia and less than 2% to international suppliers.

An overview of our direct supply chain and procurement expenditure is below:

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 Amplitude 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
- Amplitude Energy Values.

These documents are published internally, and many are publicly available 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 behaviour, 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 behaviour in our business and operations is minimised.



Potential risks in our operations and supply chains

We strive to conduct our business in a manner consistent with the Amplitude 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 Amplitude 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 Amplitude 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, protocols, procedures and guidelines. We have continued to focus on mitigating identified and potential modern slavery risks across Amplitude Energy 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).

Between FY21 and FY22 our focus was on developing our modern slavery protections and practices across our supply chain, first by focusing on our largest suppliers by spend, and then expanding on this by implementing these protections and practices into a broader range of our suppliers.

Since implementing our modern slavery protections and practices, including during FY24, we have maintained these protections and practices across our supply chain, along with focusing on suppliers providing goods and services to future projects involving or being undertaken by the company.

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 FY23 we finalised the implementation of changes to our pre-qualification procedure, which involved inserting modern slavery clauses into supplier contracts and requiring new suppliers to complete a modern slavery questionnaire before providing services to Amplitude Energy. These changes are designed to limit the potential for modern slavery in these higher risk industry sectors. In FY24 we maintained these processes and continue to assess ways to build on and improve our processes.

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 Amplitude 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 through FY22, FY23 and into FY24.

Ongoing actions taken to assess and address modern slavery risks include:

- Ongoing training with our Board of Directors and staff.
- Conducting modern slavery screening through an external ratings agency to provide modern slavery screening for all suppliers.
- Supplier pre-qualification procedure utilised and modern slavery clauses incorporated into supplier contracts.
- 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 FY25 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.

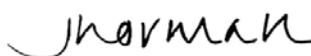
We have developed a modern slavery action plan which has the following key areas of focus:

- **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 and Board 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 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 Amplitude Energy on 6 November 2024.



Jane Norman
Managing Director & Chief Executive Officer

Disclosure Notes

This Statement has been made by Amplitude Energy Limited ABN 93 096 170 295 (Amplitude Energy). This Statement covers Amplitude Energy and its controlled entities (as set out on page 131 of the Cooper Energy 2024 Annual Report).

This Statement is for the reporting period ending 30 June 2024 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 Amplitude 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 Amplitude Energy or its controlled entities have a presence but do not actively operate.

This Statement references significant events occurring after 30 June 2024. 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.