# Shell Australia
# 2025 Modern Slavery Statement

Period January 2025 – December 2025
Published June 2026

# Contents

## About this Statement

**Joint Modern Slavery Statement (Statement) under the Modern Slavery Act 2018 (Cth) (Act) for the reporting period January 1, 2025 to December 31, 2025.**

Shell is opposed to all forms of modern slavery.

Such exploitation is against Shell's commitment to respect human rights as set out in the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

This is Shell's Sixth published Statement under the Australian Modern Slavery Act setting out the steps we have taken against modern slavery in our business and supply chains.

Shell Energy Holdings Australia Limited (SEHAL) has prepared this Statement in consultation with each of the following reporting entities, and is published by the following reporting entities in compliance with the Act:

**Relevant subsidiaries of Shell plc**

Shell Energy Holdings Australia Ltd, Shell Australia Pty Ltd, Shell Energy Environmental Products Australia Pty Ltd, Shell Energy Australia Pty Ltd, Shell Energy Operations Pty Ltd, Shell Energy Retail Pty Ltd, Powershop Australia Pty Ltd, QGC Upstream Holdings Pty Ltd, QGC Upstream Investments Pty Ltd, QGC Pty Ltd, QGC Midstream Holdings Pty Ltd, QGC Midstream Investments Pty Ltd, QGC Train 1 Tolling Pty Ltd, QGC Train 2 Tolling Pty Ltd, QGC Train 2 Tolling No.2 Pty Ltd, QGC Train 1 Pty Ltd, QGC Train 2 Pty Ltd, QGC Common Facilities Company Pty Ltd, (collectively "Shell", "our" or "we")

# 2025 draft Chair's statement

Shell has been supplying energy to Australians and powering progress and prosperity in Australia for 125 years, since delivering the first bulk kerosene shipment to our shores in 1901. And we remain a reliable energy partner today.

We are a frontier basin explorer, a major domestic gas supplier and LNG producer, a renewable and gas-fired electricity generator and battery operator, and one of the largest electricity suppliers to commercial and industrial businesses in Australia.

Fundamental to our ability to continue delivering energy to customers is consistently operating our businesses in a way that reflects our core values of honesty, integrity and respect for people. Our ongoing commitment to managing modern slavery risk is a tangible demonstration of these values in action.

The United Nations Universal Declaration of Human Rights and the International Labour Organization Declaration of Fundamental Principles and Rights at Work outlines our responsibility to uphold human rights. We do so by integrating them into our policies, frameworks, business systems and processes.

Our Modern Slavery statement shares the high expectations Shell Australia sets for its operations, the effectiveness of these strategies and the actions taken if they are not met.

Through our supply chain we spent approximately US$2.3 billion procuring essential goods and services for Shell Australia's operations in 2025 with more than 1,600 domestic and international suppliers and contractors.

We manage the modern slavery risk across our procurement, with a strong focus on direct suppliers. Further, we evaluate other high-risk areas of human rights risk across our business including communities, workplace security and labour rights.

While the prevalence for modern slavery risks is considered low in Australia, we must never be complacent. It can still occur here so ongoing commitment to sustain our progress and enhance our efforts is required.

I am pleased to share Shell Australia's 2025 Modern Slavery Statement which outlines our commitment to transparency and accountability as we work with suppliers, partners, and stakeholders in our effort to eradicate modern slavery globally.

**Cecile Wake**
Shell Australia Chair

# 1. Reporting entity

## Who we are

Shell has been providing energy to help power the nation since 1901, when we brought the first bulk kerosene shipment to Australia. Since then, we have continuously evolved our business to help meet the needs of our customers.

Our portfolio spans the country and includes our Integrated Gas and our Renewables and Energy Solutions businesses.

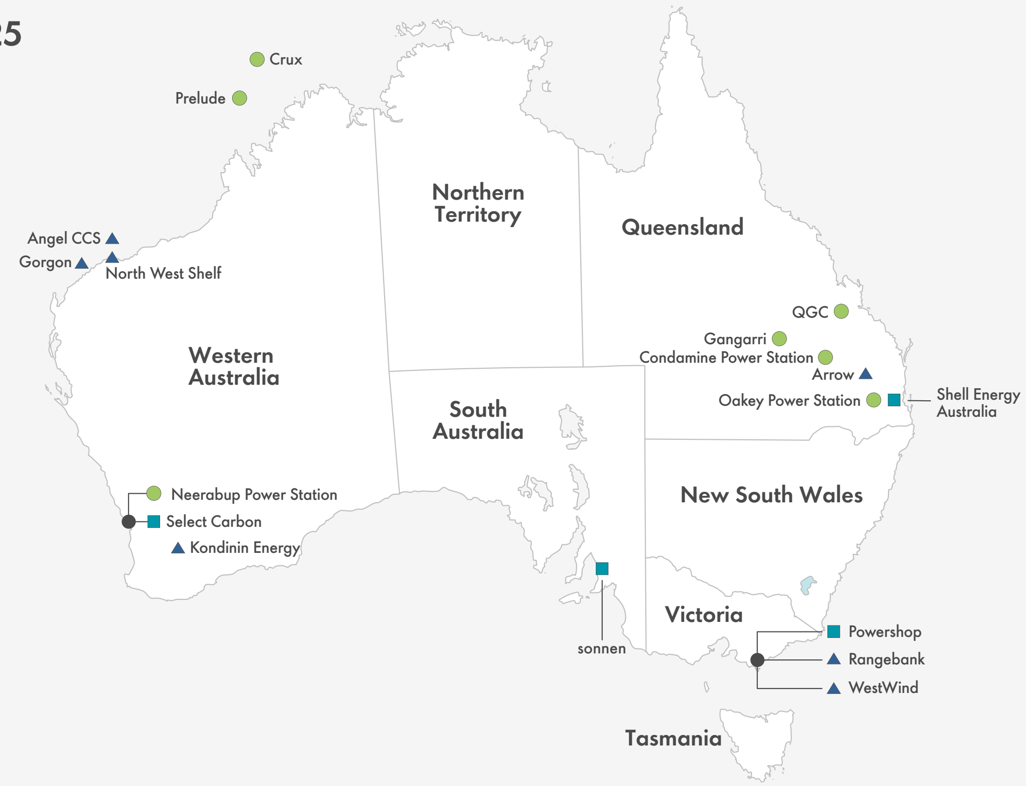
As a significant investor and employer in Australia, our longstanding history and contributions are underpinned by our core values of honesty, integrity and respect for people.

### Shell in Australia 2025

| Shell-operated | |
|---|---|
| Condamine Power Station | 100% |
| Crux | 84.5% |
| Gangarri | 100% |
| Neerabup Power Station | 50% |
| Oakey Power Station | 100% |
| Prelude | 67.5% |
| QGC | 75% |

| Shell-owned subsidiaries | |
|---|---|
| Powershop | 100% |
| Select Carbon | 100% |
| Shell Energy Australia | 100% |
| sonnen | 100% |

| Non-operated | |
|---|---|
| Angel CCS | 20% |
| Arrow Energy | 50% |
| Gorgon | 25% |
| Kondinin Energy | 50% |
| North West Shelf | 16.67% |
| Rangebank | 45% |
| WestWind | 49% |




## Integrated Gas portfolio

Our Australian Integrated Gas portfolio includes the Shell-operated QGC and non-operated Arrow Energy venture in Queensland, and the Prelude FLNG facility and Crux Project off the coast of Western Australia, as well as several non-operating ventures.

### Queensland

**QGC** is one of Australia's leading natural gas producers, supplying the domestic market since 2006 and international customers since 2014.

While Shell is the operator and majority interest holder in the QGC venture, our partners for the LNG export facility include CNOOC (50% equity in Train 1) and MidOcean Energy (2.5% equity in Train 2).

The venture explores for, develops and produces gas from the Surat Basin. Its operations include over 3,500 production wells, 26 field compression stations, six central processing plants, two water treatment plants, 540km of pipeline and a two-train LNG export facility on Curtis Island.

In 2025, QGC continued to ensure a reliable gas supply for Australian and international customers. Work commenced on a new tranche of 170 onshore natural gas wells in the Western Downs region of Queensland. As at the end of 2025, the venture had shipped more than 1,200 LNG cargoes.

**Arrow Energy** is a 50:50 joint venture between Shell and PetroChina and has been operating gas and power assets since 2000.

In 2025, Arrow Energy achieved first gas from its northern gas fields as part of the second phase of the Surat Gas Project. The project is expected to produce more than 400 petajoules of gas to meet long-term contracts and domestic customers, over the life of the project.

### Western Australia

**Prelude FLNG** is operated by Shell in a joint venture with INPEX (17.5%), KOGAS (10%) and OPIC (5%).

The facility produces natural gas from an offshore field approximately 475km northeast of Broome. It extracts, liquefies and stores natural gas at sea, before it is transferred and shipped to customers. Prelude relies on onshore support operations which are mostly managed through the Kimberley region and Darwin.

Shell Australia is also developing the **Crux Project** to ensure a continued supply of gas to Prelude FLNG. The project consists of a not normally manned platform that will be connected to the Prelude FLNG facility via a 160km export pipeline. Shell's joint venture partner in the project is SGH Energy (15.5%).

We are also a non-operating partner in two major gas projects in Western Australia.

The Gorgon Project (Shell interest 25%), is one of the world's largest LNG projects and the largest single resource project in Australia's history. It is operated by Chevron, and the other joint venture participants are ExxonMobil, Osaka Gas, Tokyo Gas and JERA.

Shell is also a foundation participant in the North West Shelf (NWS) Project (Shell interest 16.67%), and is a technical advisor. The NWS Project is operated by Woodside. The other participants are BP, Chevron, MIMI and CNOOC.

## Shell Energy Australia

Shell Energy Australia Pty Ltd (Shell Energy) is a wholly owned subsidiary of SEHAL and Shell's generation-backed trader and energy retailing business in Australia.

Shell Energy supplies electricity and gas to business and residential customers and offers innovative products and reliable energy solutions for customers and is Australia's market-leading large business customer electricity retailer in size and customer satisfaction [A].

Its energy solutions offerings are complemented by a portfolio of gas-fired peaking power stations in Queensland and Western Australia and battery storage assets in Victoria and New South Wales, supporting energy security and reliability.

Through residential energy retailing business Powershop, Shell Energy also supports customers in Victoria, New South Wales, South Australia and South East Queensland.

Learn more about our businesses at:
**www.shell.com.au** and **www.shellenergy.com.au**

[A] By load, based on Shell Energy analysis of publicly available data. Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including Shell Energy by independent research company NTF Group in 2011-2025.

# 2. Company structure, operations and supply chains

## Shell plc

Shell plc (Shell) is a global group of energy and petrochemical companies employing 85,000 people across more than 70 countries. Shell provides energy, directly or indirectly, to around a billion people every year.

For further information on our global businesses and supply chains, please refer to Shell plc's Statement under the **UK Modern Slavery Act for Financial Year 2025**.

## Shell in Australia

In Australia, Shell's businesses, operations and supply chains are divided into Integrated Gas (upstream and midstream), Shell Energy Australia and Trading and Supply.

Our Integrated Gas business activities and operations include exploration for, and development and production of onshore and offshore natural gas fields. The business also includes the shipping and trading of natural gas products.

Shell Energy's business activities and operations include power generation, energy and gas retailing, project development and asset management, wholesale trading and customer support.

Both Integrated Gas and Shell Energy are supported by corporate services such as Legal, Commercial, Human Resources, Information Technology, Corporate Relations, Supply Chain, Finance and Health, Safety, Security and Environment (HSSE).

Most of our Australian Trading and Supply activities relate to financial transactions in the electricity market. These transactions are with wholesale clients or are undertaken on licensed and regulated financial exchanges. Physical trading transactions are undertaken predominately with wholesale clients, such as Australian-based licensed gas retailers or large gas consumers or with other Shell Group companies.

Across our businesses and operations in Australia, we employ more than 2,700 staff that represent diverse backgrounds and span locations from capital cities to regional areas.

Shell's Supply Chain operations in Australia are supported by a dedicated local team of over 70 employees, complemented by appropriate global functional support, including central category and global supplier teams, and service delivery support provided through Shell Business Operations. In 2025, Shell in Australia spent around US$2.3 billion on goods and services, which it procured from over 1,600 suppliers and contractors (suppliers), both nationally and internationally [B].

[B] Note: specific to Shell Energy Australia, this excludes any settlement transactions i.e., derivative counterparties, Australian Energy Market Operator (AEMO), Network companies.

**This Statement predominantly describes how our Supply Chain team approaches modern slavery risk in the purchase of goods and services for our operations as we believe this is an area that poses higher labour rights risk. Our focus, for the purpose of this Statement, is on our direct suppliers.**

For our Integrated Gas business, the categories of goods and services Shell procures generally cover the asset life cycle. This includes:

- exploration;
- construction services;
- offshore installations;
- wells services;
- rotating equipment;
- engineering and maintenance services;
- transportation and logistics;
- fuel; and
- consumables, such as operating and maintenance supplies.

For Shell Energy Australia, the range of categories of goods and services procured covers:

- engineering, procurement of goods and services and construction;
- operations and maintenance;
- supply for behind-the-meter battery storage systems and solar;
- IT software;
- professional services and consulting;
- warehouse and logistics services;
- metering equipment and B2C support services;
- industrial parts for generation power stations; and
- consumables.

Based on our contract value, our top suppliers are in Australia, Singapore and Switzerland, followed by the UK and USA.

Our Supply Chain team works with suppliers to deliver the non-hydrocarbon goods, services, marine, air and road logistics that are needed by Shell's diverse global businesses and assets. As part of Shell's responsible sourcing approach, we aim to work with suppliers that behave in an economically, environmentally and socially responsible manner. Our standard supplier contract terms require adherence to the Shell General Business Principles (SGBP) and Shell Supplier Principles (SSP) or equivalent principles.

Our SSP provide information on the expectations we have of our suppliers on the following topics:

- **Business Integrity:** Compliance with Shell standards and applicable laws and regulations, including with respect to corruption, bribery, competition and conflicts of interest.
- **Health, Safety, Security, Environment and Social Performance (HSSE & SP):** A systematic approach to managing HSSE, including environmental protection, energy and resource efficiency, managing social impacts, and respectful engagement with employees, communities and other stakeholders.
- **Labour and Human Rights:** Respect for human rights and labour rights, including no use of forced or child labour; no payment of recruitment fees by workers; compliance with applicable laws on freedom of association and collective bargaining; no tolerance for harassment, discrimination or retaliation; compliance with applicable laws on working hours; wages and benefits that meet or exceed national legal standards; and provision to workers by contractors and suppliers of a dedicated whistle-blowing mechanism where grievances related to below topics can be logged confidentially.

# Our values and policies

## Respecting human rights

Human rights are fundamental to Shell's core values of honesty, integrity and respect for people.

We recognise our responsibility to respect human rights in all aspects of doing business and have embedded this in the SGBP, the Shell Code of Conduct, and the SSP.

For more information on Shell's policy and procedures towards human rights, please visit our **Human Rights webpage**.

We have an integrated approach to human rights that is embedded into our policies, Shell Performance Framework and processes. Human rights due diligence is embedded into our ways of working, applicable to all employees and contractors.

Our approach is informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. They include topics such as freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation.

### Approach to human rights

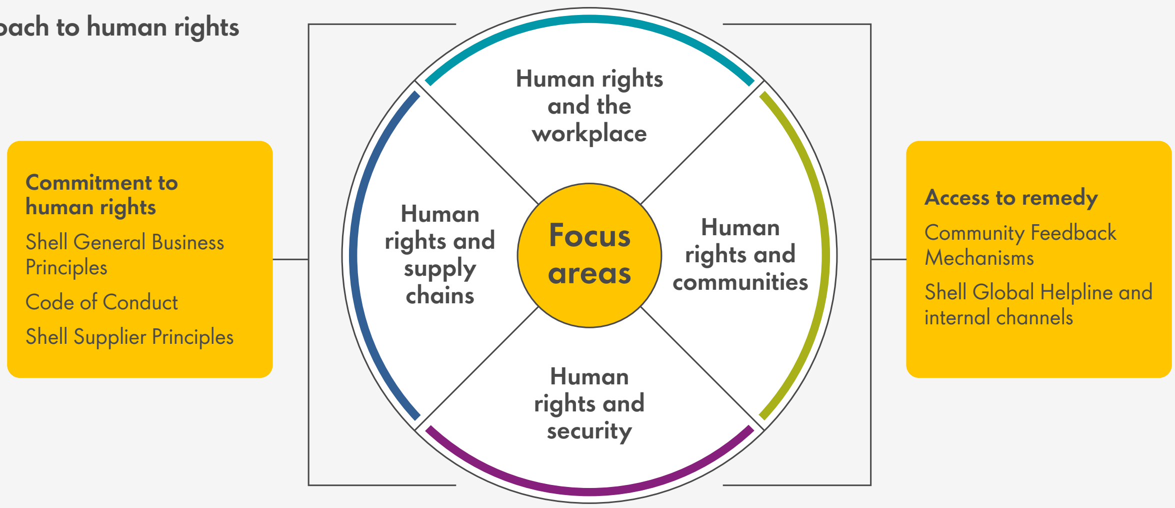



**Diagram description:** The above diagram shows a doughnut shaped graphic which is divided into 4 segments. Going clockwise around the diagram: the top segment is colour-coded light blue with the wording Human rights and the workplace; the right segment is colour-coded green with the wording Human rights and communities; the bottom segment is colour-coded purple with the wording Human rights and security; and the left segment is colour-coded dark blue with the wording Human rights and supply chains. The centre of the doughnut is filled yellow with the wording Focus areas. On either side of the doughnut are two boxes. The left box is titled Shell's commitment to human rights under which is listed: Shell General Business Priciples, Code of Conduct and; Shell Suppler Principles. The right box is titled Access to remedy under which is listed: Community Feedback Mechanisms and; Shell Global Helpline and internal channels.

#### Human rights and the workplace

We respect our employees and contractors' rights, including freedom from forced labour and discrimination by working in line with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the UN Global Compact. Our approach is based on the Building Responsibly Principles.

#### Human rights and communities

Our activities can impact the communities where we operate. Through careful project design and responsible management we aim to minimise those impacts and avoid human rights infringements. We do this in line with the International Finance Corporation's Performance Standards and the UN Guiding Principles on Business and Human Rights. We work with local communities to jointly identify solutions and opportunities.

#### Human rights and security

Shell aims to keep staff and facilities safe while respecting the human rights and security of local communities. We carefully assess the security threats and risks to our operations and work with governments and partners to provide a secure working environment. Shell only uses armed security in countries where the threats are most severe, or if it is a requirement under local laws.

#### Human rights and supply chains

The Shell Supplier Principles outline what we expect from contractors and suppliers in areas such as human rights. This includes ensuring no use of forced, prison or compulsory labour or payment of recruitment fees by workers. The principles also ensure a safe, secure and healthy workplace for staff and contractors and payment of wages that meet or exceed national legal standards.

Where we have potentially caused or contributed to adverse impacts, we provide and facilitate access to remedy through community feedback mechanisms and the Shell Global Helpline.

Shell does not require individuals or communities to permanently waive their legal right to bring a claim through a judicial process as a precondition of raising a grievance through a Shell grievance mechanism, nor will Shell otherwise take extrajudicial measures to obstruct state-based judicial processes.

Our high-risk contracts contain requirements for the contractor to provide access to remedy provisions in accordance with our worker welfare ambition. This ambition is to respect worker rights and promote welfare, enabling better performance through care. This includes reflecting our core values and commitment to safety. When people feel cared for, they perform at their best.

Our contractors and suppliers are expected to conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization.

The SSP further clarify the expectations we have of our suppliers on labour and human rights, including (but not limited to):

- no use of child labour;
- no use of forced, prison or compulsory labour;
- no payment of recruitment fees by workers;
- compliance with all applicable laws and regulations on freedom of association and collective bargaining;
- a safe, secure and healthy workplace that does not tolerate discrimination, harassment or retaliation;
- compliance with all applicable laws and regulations on working hours; and
- providing wages and benefits that meet or exceed the national legal standards.

All Shell companies and Shell-operated joint ventures must comply with local legislation and regulations and must conduct their activities in line with the SGBP and our core values of honesty, integrity and respect for people. When entering a joint venture operated by a partner, we expect them to apply standards, processes and principles that are materially equivalent to our own. When acquiring new companies, we integrate these companies into the Shell Performance Framework.

# 3. Assessing and identifying our modern slavery risks

## Risks in our operations and supply chains

**We recognise that certain areas of our operations and supply chains may present higher risks of labour rights violations or modern slavery because of their location or types of goods and services involved. This section outlines how the Supply Chain team typically assesses these risks.**

As potential human rights impacts can arise in any country or category, we take a risk-based approach when assessing suppliers.

### Country risk

Supply chain country risk is derived from external indices provided by an external consultancy, Verisk Maplecroft, and which indicate the risk of modern slavery in-country for migrant workers. In 2025, Shell Australia's contract spend from countries assessed as high risk represented less than 1% of total contract spend.

### Category risk

Supply chain category risk is determined by the analysis of typical contract work scopes. This identifies work scopes, such as services, where there may be higher risks of unethical labour practices in the recruitment of migrant workers by contractors or agents working on their behalf. Based on spend concentration and inherent risk, Shell Australia identified the following categories as higher risk in 2025:

- engineering, research and technology services;
- building, facility construction and maintenance services;
- transportation, storage and mail services;
- mining, oil and gas services; and
- manufacturing components and supplies.

Shell evaluates and selects its suppliers based on, among other things, the following considerations: capability to act in accordance with the SGBP and SSP, clear financial position, technically capable of delivering in line with Shell standards, ability to deliver the scope of work safely, and manage human rights and worker welfare within their own operations and respective supply chains.

After the initial assessment of potential suppliers, we may carry out additional risk assessments. These can trigger further assessment of suppliers' capability on topics such as worker welfare, and ethics and compliance. Depending on the risk profile, suppliers may be asked to put mitigation actions in place.

## Risks in business models

We acknowledge that the use of global framework agreements in Australia may give rise to modern slavery risks. Global Enterprise Framework Agreements (EFAs) awarded in various countries but used in Australia for commerciality purposes may need to be reviewed for compliance with modern slavery requirements and associated risks.

Should an EFA need to be called off, local contract terms and conditions will be applied, and local due diligence over and above the existing EFA will be completed if necessary.

Additionally, global contractors may make use of subcontractors. Each of Shell's contractors and suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.

Contractually, subcontractors form part of the Contractor Group, and must meet the following requirements:

- They must comply with applicable laws, the SGBP and the SSP;
- If the Contractor Group supplies staff, they must behave in a manner consistent with the Shell Code of Conduct; and
- If the Contractor Group becomes aware of (suspected) violations, they can report using the Shell Global Helpline.

Shell continues to strengthen its risk assessment to identify risks of modern slavery in our supply chains or where mitigations may be needed in our businesses, including in areas of new business development.

## Modern Slavery Assessment Tool

We continue to utilise the Modern Slavery Assessment Tool (MSAT) via a third-party provider to increase modern slavery risk visibility to more suppliers and improve our understanding of potential risks across the supply chain.

MSAT questions cover inherent risks (geographical and industry) and risk controls (policy, procedure and workforce). Sources of the assessment and analysis include The Social Responsibility Alliance; Global Slavery Index; International Labour Organization; Australian, USA and UK Government departments; and UNICEF.

Participating suppliers are selected based on contract category, status and expiration. They are asked to complete a self-assessment questionnaire online. After each supplier completes and submits the questionnaire, their responses are assessed to determine their modern slavery risk scores and associated risk category.

Post assessment, action items are identified to reduce the unmitigated risks uncovered during the assessment across Shell's supply chain.

# 4. Actions taken to address risks

**We recognise the role of labour rights due diligence in bringing our commitments to life. This section describes the due diligence and remediation process taken in assessing and addressing potential modern slavery risks.**

## Worker welfare due diligence

Shell has established standards in support of fundamental labour rights for value chain workers on Shell sites and dedicated supplier staff on non-Shell sites. These are embedded in our Safety, Environment and Asset Management Standards (SEAM) and our Category Management and Contracting Process Framework (CMCP). We refer to them collectively as "worker welfare". Our approach is based on the 10 principles established by Building Responsibly, an alliance of companies that seeks to promote the rights and welfare of workers in the engineering and construction industry.

Before awarding a contract, our standards require an assessment of whether the contract has high potential exposure to risks of negative impacts on worker welfare and labour rights violations. If so, our standards require us to pre-qualify the supplier's capability to manage these issues. For contracts with high potential exposure to worker welfare risks, our standards require the supplier to develop a worker welfare management plan.

The plan is designed to achieve compliance with the Building Responsibly principles, and International Finance Corporation [C] and European Bank for Reconstruction and Development (EBRD) standards on worker accommodation. It establishes minimum expectations for labour rights, including:

- no discrimination;
- no forced, trafficked or child labour;
- ethical recruitment;
- freedom to change employment;
- access to documentation;
- respect for wage and benefit agreements;
- worker representation;
- access to grievance mechanisms; and
- healthy, safe and habitable living and working conditions.

The plan includes regular suppliers to consider worker feedback when developing or updating the worker welfare management plan.

Our standards require us to assure the effectiveness of worker welfare management plans, review performance against contractual requirements and agree actions for continuous improvement.

We use a risk-based approach to verify implementation of action plans through mechanisms such as audits, site visits and updates as part of general business performance reviews with suppliers.

## Enhanced value chain due diligence

In 2024, Shell introduced an Enhanced Value Chain Due Diligence policy within our CMCP that sets out the process for enhanced due diligence for new contracts identified as having the highest potential for human rights.

Identifying and mitigating potential negative impacts in this part of our value chain is complex. We generally have contractual relationships with our direct suppliers, which may limit our visibility and influence deeper in the value chain. The scope of the Enhanced Value Chain Due Diligence policy is limited to procurement contracts managed by Shell's Supply Chain organisation, which generally manages procurement of non-hydrocarbon goods and services on behalf of Shell companies and joint ventures in which Shell is the operator.

The first full year in which the Enhanced Value Chain Due Diligence policy was operational was 2025. We have trained key staff to support the roll out of the process and have established a mechanism and focal point to assess the policy's effectiveness on an ongoing basis.

For new contracts, we apply a risk-based approach to screening for potential human and labour rights impacts during pre-qualification or tendering. We conduct due diligence to verify suppliers' ability to meet our standards for categories of goods and services with high potential exposure to negative impacts. These categories include specified raw materials, feedstocks, components, transport and logistics services.

For high-risk contracts, the Enhanced Value Chain Due Diligence policy requires suppliers to complete a capability assessment of their ability to prevent, mitigate and remediate negative impacts within their own operations and relevant parts of their supply chain. If gaps are identified, suppliers are required to develop an action plan with controls in place prior to contract commencement, with the intent of mitigating the gaps throughout the duration of the contract.

For contracts assessed as high risk for potential impacts, the Enhanced Value Chain Due Diligence policy also requires the inclusion of human rights due diligence clauses and progress checks during contract performance reviews.

[C] **www.building-responsibly.org/worker-welfare-principles**.

## Training

With limited exception, Shell staff undertake refresher training on our Code of Conduct and associated Ethics and Compliance policies. Training participation is documented, repetition cycles are clearly defined, and follow-up is automated. Both the Code of Conduct and SGBP are available on our website in several languages.

Attention to modern slavery and related human rights issues is an integral part of our contracting and procurement process. Training is provided for the Contract Management team to gain visibility on current and accurate supplier information. In 2025, we continued to provide specific worker welfare training and enhanced information sessions for staff who are responsible for managing contractors, and for worker welfare assessments and plans. Following the completion of assessments on their suppliers, our staff who manage contracts with a higher labour rights risk may be given individual coaching and support on how to manage a supplier corrective action plan.

For our suppliers we provided a worker welfare information pack to enhance their understanding of how to manage worker welfare and labour rights when working for Shell. We also offer the Ipieca labour rights training, free of charge, to all our contractors.

We prioritise four focus areas where respect for human rights is critical to how we operate: the workplace including labour rights, supply chains, communities and security. For each of these areas, we have systems to identify potential impacts and to avoid and mitigate them

Shell employees working in these focus areas need to complete human rights training. We have updated this training in 2025 to make it more scenario-based. We encourage all employees to complete the course regardless of their role, to build greater understanding of human rights across Shell.

Links to our policies and principles mentioned in this Statement are set out below:

**Shell Strategy**

**Shell General Business Principles**

**Shell Code of Conduct**

**Shell Supplier Principles**

**Worker welfare in Shell**

**Human rights in Shell**

**Shell's approach to Human rights**

**The Shell Global Helpline**

**Shell Australia Whistleblower Policy**

# 5. Risk effectiveness

## Effectiveness and performance management

**This section describes how we generally assess the effectiveness of the risk assessment, due diligence and training actions described in the sections above.**

### Worker welfare effectiveness and performance management

To assess the effectiveness of our actions on worker welfare, including effectiveness of grievance mechanisms, we may undertake checks ranging from self-assessment and peer review to internal audits. Contractors or suppliers may be subject to on-site audits at Shell sites and some contractor locations. These audits could be announced or unannounced; allow us to monitor contractor performance with regards to worker welfare; may be performed by either Shell personnel or third-party auditors; and are to assure capable management systems and processes are in place.

We also perform periodic contract reviews which may include assessing the effectiveness of the grievance mechanism and contract-specific key performance indicators. We may gather worker feedback through surveys, site visits and other channels. Allegations of practices running contrary to the SSP that are raised with us will be investigated. This may result in the supplier being required to develop corrective action plans, backed up by on-site audits. If corrective action is not undertaken satisfactorily, Shell can terminate the contract for breach of SSP. The contract may also be terminated if suppliers breach the SGBP.

### Enhanced value chain effectiveness and performance management

In 2025, we carried out further work to assess the effectiveness of our Enhanced Value Chain Due Diligence policy. As a result of the assessment, we made adjustments to streamline our process to improve implementation. We also strengthened senior-leadership oversight of value-chain risks through enterprise-level governance mechanisms. This involved leaders across our lines of business, with a focus on managing the highest-risk components in our value chains.

### Shell Global Helpline

The Shell Global Helpline is a means to report grievances or any activity that is inconsistent with Shell's Code of Conduct, including human rights violations. All Shell employees, contract staff and third parties with whom Shell has a business relationship can use the helpline if they observe wrongdoing by a Shell company or employee.

Shell has a Whistleblower Policy for Australia that has been prepared to meet the requirements under the Australian Corporations Act and the Australian Securities and Investments Commission's guidelines. Australia has enacted a legal regime that provides specific protections for those making reports of certain types of wrongdoing (the Australian Whistleblower laws). The Shell Australia Whistleblower Policy explains Whistleblower protections, how they apply in Australian legal entities that are controlled directly or indirectly by the UK-incorporated Shell plc (Shell Australia) and to Shell Australia's businesses and operations. It also describes how these protections interact with relevant Shell global policies.

# 6. Report consultation

## Collaboration with others

**This section describes our collaboration with others, including the process of consultation with the entities we own or contract, as well as those entities jointly reporting under this Statement.**

### External collaboration

Globally, Shell is a member of the Business for Social Responsibility (BSR) human rights working group which provides an opportunity for cross-sector businesses to openly share best practices, challenges, questions and experiences implementing the Guiding Principles on Business and Human Rights across a diverse range of operational environments. In addition, BSR is a member of Shell's Human Rights Working Group, providing advice and challenging our approach to human rights across Shell and our supply chains.

We use our memberships of multiple bodies to test our approach, learn from others and contribute to the development of good practice that may be used both in our own business and with our suppliers. These bodies include Ipieca, the International Association of Oil and Gas Producers, the International Organisation of Employers, The Conference Board, the UN Global Compact Action Platform on Decent Work in Supply Chains

In addition, Ipieca has also established a mechanism for members to share worker welfare case studies to highlight best practices and lessons learned. Ipieca also held a series of webinars on access to remedy with peers and external parties

### Joint venture operators

Shell is a non-operating equity owner in several joint ventures across Australia. We set clear expectations regarding adherence to the Modern Slavery Act for the operators of these ventures.

All joint venture operators have clear public policies which oppose modern slavery (a human rights policy and code of conduct), consistent with Shell's position and expectations. The joint venture operators also require all suppliers of goods and services to adhere to these policies as part of their contracts with suppliers.

The joint venture operators conduct regular risk assessments across their operations and supply chains for potential human rights risks. Clear action plans to mitigate potential risks, including contractual clauses setting expectations of suppliers, clear due diligence processes in supplier evaluations and training programs for operator personnel are also in place.

### Consultation with reporting entities

Shell Energy Holdings Australia (SEHAL) consulted with its Board as well as the boards of the reporting entities identified in the "About this Statement" section of this Statement.

Consultation on the contents of this Modern Slavery Statement involved engagement with relevant departments, including Supply Chain, Human Resources, Corporate Relations and Carbon, Climate and Sustainability.

---

# 7. Other relevant information

## Looking ahead

At Shell, our business principles guide how we go about delivering our strategy to deliver more value with less emissions.

These principles are based on our core values of honesty, integrity and respect for people, and include the steps we take to safeguard against forced labour in our business and supply chains.

This Shell Australia Modern Slavery Statement sets out these steps throughout 2025. We continue to make progress and remain committed to enhancing our efforts in this area, including learning and adjusting our approach where necessary. While in our Statement we identify Australia as a low-risk country, we recognise that modern slavery still occurs in Australia.

Therefore, we need to continuously examine our supply chain performance and complete ongoing supplier verification to capture any areas of non-compliance. For 2026, this means we will continue to:

- manage worker welfare in line with our standards; and
- continue to embed our policy on enhanced value chain due diligence across our business activities.

# Appendix

This Statement has been approved by the Boards of the following parent reporting entities, on behalf of their respective subsidiary reporting entities covered by this Statement.

**Cecile Wake**
Company Director:
Shell Energy Holdings Australia Ltd
Date: 19 June 2026

**Cecile Wake**
Company Director:
QGC Upstream Holdings Pty Ltd
Date: 19 June 2026

**Cecile Wake**
Company Director:
QGC Midstream Holdings Pty Ltd
Date: 19 June 2026

# Appendix A

**Details of reporting entities:**

| Reporting Entity | Entity Structure | Australian Company Number |
|---|---|---|
| Shell Energy Holdings Australia Ltd | Unlisted Australian Public Company, Limited by Shares | ACN 054 260 776 |
| Shell Australia Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 009 663 576 |
| Shell Energy Environmental Products Australia Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 065 879 950 |
| Shell Energy Australia Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 085 757 446 |
| Shell Energy Operations Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 122 259 223 |
| Shell Energy Retail Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 126 175 460 |
| Powershop Australia Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 154 914 075 |
| QGC Upstream Holdings Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 130 856 843 |
| QGC Upstream Investments Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 131 104 651 |
| QGC Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 089 642 553 |
| QGC Midstream Holdings Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 130 927 203 |
| QGC Midstream Investments Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 130 857 215 |
| QGC Train 1 Tolling Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 142 293 650 |
| QGC Train 2 Tolling Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 142 293 687 |
| QGC Train 2 Tolling No.2 Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 147 896 535 |
| QGC Train 1 Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 139 569 412 |
| QGC Train 2 Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 139 569 458 |
| QGC Common Facilities Company Pty Ltd | Australian Proprietary Company, Limited by Shares | ACN 139 569 485 |

# Appendix B

| Australian Modern Slavery Act mandatory reporting criterion | Reference in this Statement | This 2025 Statement includes |
|---|---|---|
| Identify the reporting entity | Reporting entity – pages 5-6 | • Relevant reporting entity that complies with the Modern Slavery Act |
| Describe the structure, operations and supply chains | Reporting entity – pages 5-6<br>Company structure, operations and supply chains – pages 7-9 | • Business structures, operations and supply chain |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls | Assessing and identifying our modern slavery risks – pages 9-10 | • Tools used and steps taken to identify top potential risks<br>• Country risks<br>• Category risks<br>• Risks in business models<br>• Risks in the supply chain |
| Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | Actions taken to address risks – pages 10-11 | • Our approach to human rights inclusive of values and policies<br>• Due diligence in place<br>• Action taken to mitigate risks<br>• Approach taken to build capabilities |
| Describe how the reporting entity assesses the effectiveness of such actions | Risk effectiveness – page 11 | • Internal assurances and onsite audit<br>• Worker Welfare Principle<br>• Monitoring grievances mechanisms<br>• Monitoring performance data |
| Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the state | Report consultation – page 12 | • Process of consultation with reporting entities including joint ventures |
| Include any other information that the reporting entity, or the entity giving the statement, considers relevant | Other relevant information – page 12 | • Approach to progress improvement in mitigating the risk of modern slavery |