



JKC AUSTRALIA LNG PTY LTD

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JKC Australia LNG Pty Ltd Statement on Modern Slavery (2020)

JKC Australia LNG Pty Ltd ('**JKC**') makes this Statement on Modern Slavery (2020) under the *Modern Slavery Act 2018*, as adopted by the Commonwealth of Australia. This statement has been approved by JKC's Board of Directors and Shareholders.

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At JKC, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2019-2020.

JKC Australia, Its Business, and its Owners

JKC that was formed for the sole purpose of constructing the Ichthys Onshore LNG Facilities located on Bladin Point in the Northern Territory of Australia ('**Project**'). JKC has three shareholders: JGC Oceania Pty Ltd, who owns 40% ('**JGC**'); Kellogg Brown & Root Pty Ltd, who owns 30% ('**KBRPL**'); and Chiyoda Corporation ('**Chiyoda**'). JKC's headquarters is in Perth, Western Australia.

JGC is a subsidiary of JGC Holdings Corporation, a group of five major operating companies with two business segments: EPC business and functional materials manufacturing. JGC is listed on the first section of the Tokyo Stock Exchange and headquartered in Yokohama, Japan.

KBRPL is a subsidiary of the KBR Group, a global group of companies providing consulting, technology, engineering and construction solutions for a while range of markets, from aerospace and defence to energy and chemicals to intelligence. The KBR Group's head office is in Houston, Texas, and the parent entity is the NYSE listed KBR, Inc.

Chiyoda is a global engineering company specialized in oil and gas midstream for gas processing and LNG, downstream refinery and petrochemicals facilities design and construction. Chiyoda is listed on the Tokyo Stock Exchange and headquartered in Yokohama, Japan.

Structure, operations and supply chains

JKC operates out of its head office in Perth. It has no directly employees; personnel are seconded from its shareholders or their affiliates. JKC's seconded personnel are primarily made up of Australian, US, UK, and Asian nationals.

The construction of the Project at Bladin Point is finished; JKC's current operations are limited to resolving commercial matters with Inpex, the owner of the Project, and its subcontractors and vendors. As a consequence, JKC's operations and supply chains are limited to these commercial activities.

As part of these commercial activities, JKC has engaged a variety of law firms, accounting firms, and other professionals located primarily located in Australia, the US, and the UK.

JKC pre-approves all locations where work is performed by and individuals performing work for its law firms, legal professionals, and experts as part of its enhanced ethics compliance obligations for such persons. Other vendors are scrutinised before entering into any commercial arrangements and then periodically thereafter for compliance purposes.

Given the limited nature and narrow focus of its commercial activities, JKC considers the risks of modern slavery to be small.

Management of Ethics Programs and Addressing Modern Slavery

JKC takes action to promote ethical business practices and policies that protect workers from being abused in its own organisations and supply chains and specifically in the engagement with these firms. The following safeguards are in place:

- JKC has existing policies and procedures in relation to a Code of Business Conduct and ethics, which includes policies and procedures in relation to trafficking in people. ('**JKC COBC**'). Personnel assigned to JKC have been provided training related to the JKC COBC and are required to acknowledge their adherence to the JKC COBC and its related policies and procedures annually.
- Each of JKC's shareholders also has codes of business conduct in place, and they contain policies and procedures in relation to trafficking in people (each a '**Parent COBC**'). JKC is required by its constituent documents to adopt an ethics and business conduct compliance program in line with the strictest Parent COBC. Personnel assigned to JKC are required to meet the requirements of the policies of their employer and the policies of JKC. Each of these Parent COBCs prohibits the practice of modern slavery
- JKC requires each person assigned to it to review and confirm the understanding of the JKC COBC and related policies annually. Each of its shareholders have similar or more extensive requirements with respect to the Parent COBCs.
- Each of JKC's shareholders has an ethics hotline, which is operated by an outside agency that registers complaints. In each case, complaints brought to the attention of corporate management.

Review of JKC's Ethics Program

JKC reports the status of its ethics program and any breaches at quarterly meetings of its Board of Directors. To the extent that any noncompliance is identified, JKC investigates the breach and provides regular reports to the Board, together with the corrective actions that it proposes with respect to such breach.

Adopted by the Shareholders and Directors of JKC Australia LNG Pty Ltd on 1 December 2020.

JKC Australia Pty Ltd



By: Robert Kirchhoff, Company Secretary
Authorised Person
Signed: 16 December 2020