



## PE WHEATSTONE PTY LTD

### Modern Slavery Statement 2021

This is the second statement made by PE Wheatstone Pty Ltd (**PEW**) in accordance with the *Modern Slavery Act 2018* (Cth) and sets out the steps taken by PEW during its financial year ending 31 December 2021 to mitigate the risk of slavery and human trafficking taking place in our business or our supply chains.

We are committed to comply with the Modern Slavery law and to understand the human rights risks, and to take action to address such risks not only in our business, but also in our supply chains.

#### 1. Reporting Entity

PEW is a private company limited by shares incorporated in Australia. PEW's shareholders jointly own the company, they comprise:

- Pan Pacific Energy K.K. (99.9%) (an incorporated joint venture between: Mitsubishi Corporation (39.7%), Nippon Yusen (10.20%), JERA Co.,Inc. (8.02%) and JOGMEC (42.08%)); and
- JERA CO., Inc. (0.1%)

PEW has no entities that we own or control, and no joint statement has been (or will be) submitted.

PEW's principal place of business is in Western Australia with its offices located at Brookfield Place 125 St Georges Terrace in Perth, while the registered office is at Deutsche Bank Place 126 Phillip Street in Sydney.

The primary activities of PEW are the investment and participation in the joint ventures that own and operate the Wheatstone LNG Project for the production and supply of liquefied natural gas and condensate for export, and the production and supply of domestic gas for sale within Western Australia. Further details are here: <https://australia.chevron.com/our-businesses/wheatstone-project>

The joint ventures are operated by Chevron Corporation, and the other partners are KUFPEC, Woodside Energy and Kyushu Electric Power Company.

#### 2. Our supply chain

PEW deals with the export of liquified natural gas and condensate and with suppliers in our industry in the general course of business, including shipping and insurance and it retains professional advisers in areas such as legal, technical, accounting and tax. PEW purchases information technology equipment and office supplies and services. Due to the nature of our business, purchases form only a minor part of our business.

### **3. Actions taken to assess and address the risks**

#### **a. Implementation of Modern Slavery Framework**

PEW has introduced and implemented a Modern Slavery Framework in 2020. The Framework establishes the business organisation structure and the overall processes in respect of modern slavery and human trafficking, and a workflow outlining responsibilities along with relevant leadership functions and accountability.

The Framework sets out a risk assessment procedure adopted, including supplier checks and development of a method for assessing and identifying potential risk suppliers based on international guidelines (such as the Global Slavery Index), as well as a method for assessing risks in operations in conjunction with the operators by direct enquiries. Lastly it deals with risk mitigation actions to be taken in case of risks being identified in relation to suppliers or operations by directly contacting suppliers or operator for discussion, and outlines internal education and training to be conducted.

Recognising that the management of risk cannot be effectively addressed by one function only, a cross functional working group has been set up. They meet regularly to review progress on an action plan, risk assessment and mitigation, and propose future action plan.

The effectiveness of the Framework is reviewed and assessed at year-end by leadership and Board of directors.

#### **b. Risk Assessment in FY2021**

##### Previously observed risks

In FY2021 PEW has made additional assessments in respect of previously observed risks. The first being in respect of shipping and the crew's county of origin and location. The other is in our project supply chain as PEW is a non-operating joint venture partner, it does not have direct contact with project suppliers.

To obtain information to make such assessment, PEW has made direct inquiries to the shipping operator.

The enquiries showed that the shipping crews' working environment is properly managed in line with international guidelines and relevant certification from classification society.

For project supply chains, enquiries with project operator, Chevron, indicated that the risk in the Wheatstone project operation is low and subject to ongoing analysis, which is in consistent with previous statements.

#### Assessment of new suppliers in FY2021

In accordance with our Modern Slavery Framework, we have assessed our suppliers in FY2021 including new suppliers. As a result of our assessment, we confirmed no change in relation to existing suppliers and that risk among new suppliers is low.

#### **c. Risk Mitigation in FY2021**

Training has been conducted for staff responsible for supplier checks, vendor engagement and purchasing decisions for the business as to the MSA and the Framework.

While recognising that PEW has limited ability to influence major project supply chains or engage with operator's suppliers, we are seeking further information and data in this respect.

Shareholders, directors, the leadership have received Modern Slavery information sessions and separate awareness training has been completed for all staff.

Our Employment Policies Manual guide how we do business and shape the standards we set for our staff and others and the way we behave. It includes policies to support equal opportunities, and against bullying and harassment. Additionally, PEW has a whistle blower policy that is available to all employees and contractors, to report any instances or suspicions of unethical behaviour

#### **4. Assessing the effectiveness of actions**

The implemented Framework establishes a process for engagement between key business areas of procurement, commercial and legal via the working group, which engagement tasks include review and assessment of the Framework's effectiveness across our business at the end of each year.

The leadership also conducted year-end reviews as a part of the annual disclosure review process for this Modern Slavery Statement and on its recommendation, this review is endorsed by our Board in assessing the appropriateness of our frameworks, systems, the Employment Policies Manual and PEW's performance.

#### **5. Any other relevant information**

As our awareness of the issues grow, we are committed to improving our processes to ensure that we adapt appropriately and capture any risks as effectively as possible. A future action plan is to be prepared for assessment of further improvements in actions in the following years.

## 6. Process

The Board of directors of PEW has approved this Statement at its meeting on 31 May 2022.



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Hideki Yukimura  
Managing Director  
PE Wheatstone Pty Ltd