Modern Slavery Statement 2024

This is the statement made by Tokyo Gas Australia Pty Ltd (the "Company") in accordance with the Modern Slavery Act 2018 (Cth) and sets out the steps taken by the Company during its financial year ending 31 December 2024 ("FY2024") to identify and mitigate the risk of slavery and human trafficking taking place in its business and supply chains.

1. Reporting entities and consultation

a. Reporting entities

The Company qualifies as a reporting entity under the Modern Slavery Act 2018 (Cth). The Company is a wholly-owned subsidiary of Tokyo Gas Co., Ltd ("Tokyo Gas"). Tokyo Gas is a Japanese utility company, listed on Tokyo Stock Exchange, that supplies gas and is Japan's largest provider of city gas, serving more than 13 million customers for over 130 years, primarily in the Tokyo metropolitan area. Tokyo Gas's registered head office is at 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan.

During FY2024, the Company wholly owned and controlled Tokyo Gas Darwin LNG Pty Ltd, which holds a 3.066% interest in the Darwin LNG Project and associated infrastructure ("Tokyo Gas Darwin").

In FY2024, the registered address of the Company and Tokyo Gas Darwin was Level 11, Brookfield Place Tower 2, 123 St Georges, Perth WA 6000.

For completeness, we confirm that with effect on 28 March 2024, the Company transferred its ownership of the subsidiaries Tokyo Gas Pluto Pty Ltd, Tokyo Gas Gorgon Pty Ltd, Tokyo Gas QCLNG Pty Ltd, Tokyo Gas Ichthys Pty Ltd and Tokyo Gas Ichthys F&E Pty Ltd ("Former Subsidiaries") to MidOcean Energy Holdings Pty Ltd, an Australian subsidiary of EIG Global Energy Partners, LLC of the United States.

b. Process of consultation

Tokyo Gas Darwin is a special purpose vehicle established for holding interests in the Darwin LNG project, and has no employees. Tokyo Gas Darwin operated under the direction and governance of the Company. Consultation in relation to this statement had occurred among the directors of the

Company and Tokyo Gas Darwin.

2. Our structure, operations and supply chains

Prior to 28 March 2024, the Company's activities were primarily, through the Former Subsidiaries, investing and participating in various joint ventures that own and operate the LNG projects for the production and supply of liquefied natural gas ("LNG") and condensate for export, and the production and supply of domestic gas for sale within Australia. Throughout FY2024, the Company also participated in the joint venture that operates the Darwin LNG project.

The Company, Tokyo Gas Darwin and the Former Subsidiaries are not operators of the projects, rather participated in the projects as minority joint venture partners.

Further details can be found in the links:

- Darwin LNG Project (https://www.santos.com/what-we-do/five-core-assets/northern-australia-and-timor-leste/). Darwin LNG is operated by Santos Limited and its affiliates.
- Pluto LNG Project (https://www.woodside.com.au/what-we-do/australian-operations/pluto-lng). Pluto LNG is operated by Woodside Burrup Pty Ltd.
- Gorgon Project (https://australia.chevron.com/our-businesses/gorgon-project). Gorgon Project is operated by Chevron Australia Pty Ltd.
- QCLNG Project (https://www.shell.com.au/about-us/projects-and-locations/qgc/about-qgc.html). QCLNG is operated by QGC Pty Limited and its affiliates.
- Ichthys LNG Project (https://www.inpex.com.au/projects/ichthys-lng/). Ichthys LNG is operated by INPEX Operations Australia Pty Ltd and its affiliates.

The Company employed 20 employees and out of them, 12 employees were secondees from Tokyo Gas as of 31 December 2024. All employees of the Company work at the Company's office in Perth, Western Australia.

Prior to 28 March 2024, the Company invested and participated in the LNG projects in Australia through the Former Subsidiaries as further outlined above, and throughout FY2024 it participated in the Darwin LNG Project through Tokyo Gas Darwin. Each project's operator manages and operates the project and deals with suppliers of products and services used in the operation of the project, including equipment, engineering, construction, drilling, maintenance, IT and shipping. The Company monitored the operation of the projects by the operators and retained professional advisers in areas such as legal, technical, accounting and tax for such monitoring purposes.

The Company also engages suppliers for its office administration, such as purchasing office equipment, IT support services, cleaning services and other various services. Due to the nature of the Company's business, those purchases form only a minor part of the business. As stated above, all subsidiaries were special purpose vehicles, and they did not engage those suppliers directly.

3. Modern slavery risks in the operations and supply chains

The businesses of Tokyo Gas and Tokyo Gas Darwin (and prior to 28 March 2024, the Former Subsidiaries) were operated in Australia and in compliance with Australia's laws and regulations. Our suppliers were predominantly based in Australia. Our operations and supply chains were generally considered to be at low risk of exploitation and modern slavery. However, we are aware that some industries such as the cleaning sector may have higher risks of modern slavery practices and must be reviewed carefully.

4. Action taken to assess and address the risks

a. Implementation of Modern Slavery Framework

The Company has implemented a Modern Slavery Framework ("Framework"). 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 Global Slavery Index), as well as a method for assessing risks in operations in conjunction with the operators. Lastly, it deals with risk mitigation actions to be taken in case of risks being identified in relation to suppliers or operations and outlines 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 as required to review progress on an action plan, risk assessment and due diligence processes.

b. Risk Assessment in FY2024

In FY2024, the Company analysed the risks in its operations and supply chains using the following methods.

The Company reviewed and analysed the latest Modern Slavery Statements of the operators of all projects it participated in during FY2024 (including those of its Former Subsidiaries) to assess the risks in the operations: Santos Limited; Woodside Burrup Pty Ltd; Chevron Australia Pty Ltd; QGC Pty Limited; and INPEX Operations Australia Pty Ltd. The Company did not find any serious modern slavery issues which it needs to ask the operators to address or to provide more detailed information about.

The Company conducted hearings by email with its new suppliers that were engaged by the Company for the first time in FY2024, who did not disclose Modern Slavery Statements, to assess their risks of engaging in modern slavery practices. The Company sought confirmation that its contractors did not engage in any modern slavery practices, and contractors generally provided this confirmation.

The Company will continue to commit to assess the modern slavery risks and compliance in the operations and supply chains, The Company will seek improvements as necessary if any issues are identified through the process and will work to ensure the risks are adequately identified, assessed and mitigated.

c. Risk mitigation in FY2024

In FY 2024, in addition to our training provided to the employees who joined the Company by the end of 2023, the Company provided compliance training to all employees throughout the year.

The Company has continued to further improve its Employment Policy Manual, which is made available to all employees and contractors, to better guide their conduct and to provide its business standards. Among various guidelines and requirements provided in the Employment Policy Manual, it is required that they report any instances of suspicions of any unethical behaviours including, but not limited to, potential modern slavery issues.

5. Assessing the effectiveness of actions

The 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 the business at the end of each year.

The leadership also conducts year-end reviews as a part of the annual disclosure review process for this Modern Slavery Statement and its recommendations. This review is endorsed by the board of directors of the Company in assessing the appropriateness of our framework, systems, the Employment Policy Manual and the Company's performance.

1. Any other relevant information

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

2. Approval

The board of directors of the Company has approved this statement on behalf of the Company by resolution dated 21 May 2025.

This statement is signed by Hiraku Endo in his capacity as the CEO of the Company.

CEO of Tokyo Gas Australia Pty Ltd