

Strategic Gas Market Trading Pty Ltd

Modern Slavery Statement

Financial Year 2022

This Modern Slavery Statement by SGMT (Strategic Gas Market Trading Pty Ltd), in accordance with the requirements outlined in the *Modern Slavery Act 2018 (Cth)* for the financial year ended June 2022. As a gas trading company committed to promoting ethical practices and responsible supply chain management, SGMT aims to eradicate modern slavery from all aspects of its operations.

#### Introduction:

SGMT is a Brisbane based independent trading business which specialises in providing strategic advice, and expert commercial, trading, regulatory, and scheduling/operations advice to participants, or aspiring participants, in the Australian east coast gas industry. This report outlines our efforts to combat modern slavery in compliance with the Modern Slavery Act.

#### Organizational Structure:

SGMT operates as a private company, with our headquarters located in Brisbane, Queensland. We have a workforce comprising 4 employees.

#### Operations Overview:

We engage with a wide network of suppliers, gas producers, transporters, and storage facilities to meet our customers' demands. As part of our commitment to ethical practices, we aim to work with counterparties who share our values and adhere to high standards of labour and human rights.

#### Risk Assessment and Due Diligence:

To identify and address potential modern slavery risks in our operations, SGMT has implemented a comprehensive risk assessment and due diligence process. Key steps undertaken include:

**Mapping:** We have mapped our supply chain to identify areas where modern slavery risks may exist. This process helps us understand the regions and sectors that pose higher risks.

**Supplier Engagement:** We engage with our suppliers to assess their commitment to combatting modern slavery. Our supplier evaluation process may include screening, questionnaires, and site visits where necessary.

**Contractual Obligations:** We have the ability to incorporate modern slavery clauses into our contracts with suppliers, requiring them to comply with applicable laws and regulations, including those related to labour standards and human rights.

Training and Awareness: SGMT conducts regular training sessions to raise awareness among employees about modern slavery risks, indicators, and reporting procedures. We encourage a culture of vigilance and responsibility throughout our organization.

#### Policies and Procedures:

SGMT has developed and implemented a robust set of policies and procedures to address modern slavery risks. These include:

**Code of Conduct:** We have a Code of Conduct that outlines our commitment to ethical business practices, including the prohibition of modern slavery and human trafficking.

**Whistleblowing Policy:** SGMT maintains a confidential whistleblowing mechanism to encourage employees, suppliers, and stakeholders to report any concerns or suspicions of modern slavery within our operations or supply chain.

**Grievance Mechanism:** We have established a grievance mechanism to address any complaints or issues related to modern slavery promptly. We take all allegations seriously and ensure appropriate action is taken if any violations are substantiated.

**Continuous Improvement:** SGMT is committed to continuous improvement in our efforts to combat modern slavery. We regularly review and update our policies and procedures to align with industry best practices and legal requirements.

#### Conclusion:

SGMT is dedicated to eradicating modern slavery from its operations and supply chain. We recognize that this is an ongoing process, and we remain committed to working collaboratively with our suppliers, industry partners, and stakeholders to address this global issue effectively.

We will continue to monitor and evaluate our practices, adapt our strategies, and actively engage with organizations and initiatives that promote transparency, accountability, and responsible business conduct.



Brendan Dillon

Sole Director

**Strategic Gas Market Trading Pty Ltd**

Statement of Principle Governing Body approval

SGMT is a single director proprietary limited company owned by Strategic Gas Market Solutions Pty Ltd as trustee for B&P Dillon Business Trust, itself a sole director company.

I, Brendan Dillon, in my capacity as Sole Director of Strategic Gas Market Solutions Pty Ltd hereby declare Principle Governing Body approval of this Modern Slavery Statement for Strategic Gas Market Trading Pty Ltd

A handwritten signature in black ink that reads "Brendan D. Dillon". The signature is written in a cursive, flowing style.

Brendan Dillon

Sole Director

**Strategic Gas Market Solutions Pty Ltd**