



KOGAS Australia & KOGAS Prelude Modern Slavery Statement 2024

1 Reporting entities and consultation

a. Reporting entities

Korea Gas Corporation (**KOGAS**) is a South Korean public natural gas company. The main business of KOGAS is building terminals and a gas supply pipeline network, importing liquefied natural gas (**LNG**), regasifying LNG at the terminals, and supplying natural gas to local gas companies and power plants in South Korea. As of January 2025, KOGAS operates a pipeline network in Korea spanning over 5,206 km and supplies natural gas to 20.4 million households in 216 cities and counties with a distribution rate of 84.7% of all households nationwide. KOGAS' registered head office is at 120 Cheomdan-Ro Dong-Gu Daegu Republic of Korea.

Kogas Australia Pty Ltd (**Kogas Australia**) and Kogas Prelude Pty Ltd (**Kogas Prelude**) (each a **Company** and together the **Companies**) are wholly owned and controlled subsidiaries of KOGAS. Kogas Australia, in turn, wholly owns and controls the following subsidiaries in Australia (**Kogas Australia Subsidiaries**): KGLNG E&P Pty Ltd, KGLNG E&P II Pty Ltd; and KGLNG Liquefaction Pty Ltd.

This statement is made jointly by Kogas Australia and Kogas Prelude in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**). Among the Kogas Australia Subsidiaries, KGLNG E&P Pty Ltd and KGLNG Liquefaction Pty Ltd also qualify as reporting entities under the Act and are covered by this statement.

This statement sets out the steps taken by each Company during its financial year ending 31 December 2024 (**FY2024**) to identify and mitigate the risk of slavery and human trafficking taking place in their business and supply chains.

b. Process of consultation

This statement has been approved by the board of directors of Kogas Australia and the board of directors of Kogas Prelude, following consultation between the Companies and the Kogas Australia Subsidiaries in the development of this statement, and is signed by Sang Hyun Lim on behalf of Kogas Australia and the Kogas Australia Subsidiaries and by Kihong Kwon on behalf of Kogas Prelude.

2 Our structure, operations and supply chains

KOGAS, through the Companies, invests in the following LNG projects in Australia:

- Kogas Australia holds a 15% interest in the Gladstone LNG project and associated infrastructure. The registered address of Kogas Australia is Level 36, 32 Turbot Street, Brisbane Queensland 4000.



- Kogas Prelude holds a 10% interest in the Prelude floating LNG project and associated infrastructure. The registered address of Kogas Prelude is Level 11, 28 The Esplanade, Perth Western Australia 6000.

The Companies are special purpose vehicles established for holding interests in the relevant LNG projects.

The primary activities of each Company, including the Kogas Australia Subsidiaries, involve investing in and participating in joint ventures that own and operate LNG projects. These projects focus on the production and supply of LNG for export, and additionally in relation to Kogas Prelude only, production and supply of condensate and LPG for export. The Companies are not operators of the projects, rather participate in the projects as minority joint venture partners.

Further details on the projects are set out below.

- **Gladstone LNG Project (GLNG Project)**

Gladstone LNG Project is an unincorporated joint venture established by the GLNG Joint Venture Agreement dated 13 January 2011, involving four project participants being Santos Limited (the operator), Petronas, TotalEnergies and Kogas Australia. GLNG Operations Pty Ltd (**GLNG Operations**) is an entity established jointly by the GLNG Project's joint venture participants to operate the liquefaction facilities and assist with the joint marketing of gas/LNG as agent for the GLNG Project's joint venture participants; this represents the downstream operations of the GLNG Project. The unincorporated upstream joint venture, operated by Santos, involves the exploration and production of natural gas. Kogas Australia holds a 15% interest in the GLNG Project.

Santos' modern slavery statements describe the activities in operations of the GLNG Project. In summary, the GLNG Project was one of the world's first coal seam gas to LNG projects. Feedstock gas for the project is sourced from GLNG's upstream fields, as well as from Santos' gas portfolio and third-party sources. The project primarily exports LNG produced in Gladstone, Queensland to Asian markets. For further details refer <https://www.glng.com/about-us>

- **Prelude Floating LNG Project (Prelude FLNG)**

Prelude FLNG is operated by Shell Australia Pty Ltd that holds 67.5%, and involves INPEX 17.5%, CPC 5% and Kogas Prelude 10%. Prelude FLNG production capacity is at least 5.3 mtpa of liquids: 3.6 mtpa of LNG, 1.3 mtpa of condensate and 0.4 mtpa of liquefied petroleum gas. For further details refer <https://www.shell.com/what-we-do/major-projects/prelude-flng.html>

As of the date of this statement, Kogas Australia employs 21 employees and out of them, 14 employees are seconded by KOGAS from South Korea with the remaining 7 employees being hired locally. The employees of Kogas Australia are largely based at Kogas Australia's office in Brisbane, Queensland, with some seconded to GLNG Operations or to Santos. The Kogas Australia Subsidiaries do not engage any employees, as their management and activities are carried out by Kogas Australia.



As of the date of this statement, Kogas Prelude employs 10 employees and out of them, 7 employees are seconded by KOGAS from South Korea with the remaining 3 employees being hired locally. All employees of Kogas Prelude work at Kogas Prelude's office in Perth, Western Australia.

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. Each Company monitors the operation of the relevant project by the operator and retains professional advisers in areas such as legal, accounting and tax.

Each Company also engages suppliers for its office administration, such as renting office and office equipment, IT support services, cleaning services, car parking, recruitment and services for expatriate workers' support. Due to the nature of the Companies' business, those purchases form an insignificant part of the business of each Company.

3 Modern slavery risks in the operations and supply chains

The Companies have considered the risks of being indirectly involved in modern slavery as a result of a joint venture operator engaging a supplier who is involved in modern slavery practices. As set out above, each Company's involvement in the respective LNG project is limited to non-operated joint venture interests, and the Companies are not in a position to directly control the supply chains of those investments. Having said that, the Companies review and confirm modern slavery statements and public communications of the project operators from a joint venture partner's point of view. The operators have in place policies and procedures, risk management, action plans and effectiveness assessments in relation to the mitigation of modern slavery practices, and we consider any risk to be low.¹ Going forward, the Companies will consider opportunities to discuss with the project operators a scope for including obligations in relation to modern slavery in various contracts with project contractors and suppliers.

The businesses of Kogas Australia and the Kogas Australia Subsidiaries, and Kogas Prelude are operated in Australia and in compliance with Australia's laws and regulations. Our suppliers are predominantly based in Australia. Given the limited nature and narrow focus of the Companies' activities, the Companies' operations and supply chains are generally considered to be at low risk of exploitation and modern slavery.

Kogas Australia directly procures office cleaning services, while procuring other office maintenance activities through a third-party office manager. Kogas Prelude is not directly involved in procuring corporate cleaning and office maintenance activities, with these services provided and managed by the landlord, Jones Lang LaSalle Pty Ltd (JLL). JLL has modern slavery frameworks in place, including policies and procedures (such as their Human Rights Policy and Vendor Code of Conduct); contractual obligations imposed on their suppliers; risk assessment, due diligence and

¹ Santos Limited Modern Slavery Statement for 2023 is located here: <https://www.santos.com/wp-content/uploads/2024/06/2023-Santos-Modern-Slavery-Statement-Submitted-30-June-2024.pdf>; Shell Australia Modern Slavery Statement for 2023 is located here: https://www.shell.com.au/sustainability/reporting/jcr_content/root/main/section/promo/links/item0.stream/1722136091755/172d3615f7ddcaa38e5f51b758198136b96057a6/shell-australia-2023-modern-slavery-statement.pdf

audit processes; as well as confidential reporting mechanisms.² We are aware that some industries such as the cleaning sector may have higher risks of modern slavery practices and must be reviewed carefully, and we will monitor these risks in our business in collaboration with our cleaning services providers.

The Companies are aware that there may be a risk of contributing to modern slavery by the secondment of overseas employees from KOGAS to undertake work in Australia. We will work to assess and address these risks in our business. Given that our secondees are expatriated from South Korea, subject to robust legal frameworks and stringent employment protection laws, we consider any risk associated with our secondees to be low.

4 Action taken to assess and address the risks

a. Risk Assessment in FY2024

There were no actual or suspected occurrences of modern slavery reported within each Company for the reporting period. Each Company analysed the risks in its operations and supply chains as follows.

Each Company has undertaken due diligence activities in that they have reviewed and analysed the latest modern slavery statements of the operators of the projects to assess the risks in the operations: Santos Limited and Shell Australia Pty Ltd. The Companies are satisfied with the processes the joint venture operators have in place to mitigate modern slavery practices. All joint venture operators have a clear suite of policies and procedures which oppose the occurrence of modern slavery, consistent with the Companies expectations.

The joint venture operators conduct regular risk assessments across their operations and supply chains for potential human rights risks, and have in place clear action plans to mitigate potential risks, such as contractual obligations for suppliers, clear due diligence processes in supplier evaluations, and training programs for operator personnel. The operators also have effectiveness assessments in place. The Companies did not find any serious modern slavery issues which they need to ask the operators to address or to provide more detailed information about.

Each Company will continue to commit to engaging with the operators, other joint venture participants and direct suppliers to assess the modern slavery risks and compliance in their operations and supply chains. Each Company will seek improvements as necessary if any issues are identified through the process and will work with the operators, other joint venture participants and suppliers to ensure the risks are adequately identified, assessed and mitigated.

b. Risk mitigation in FY2024

² Jones Lang LaSalle Pty Ltd Modern Slavery Statement for 2024 is located here:
<https://www.jll.com/content/dam/jllcom/en/global/documents/policies/corporate/25-hub-sustainability-esg-modern-slavery-statement.pdf>

As described above, the Companies hold minority, non-operating interests in their joint ventures, and rely on the guidance and actions of its joint venture partners to mitigate modern slavery risks within the supply chains of the joint ventures.

During the reporting period, in order to raise awareness and enable the Companies' employees to directly understand the importance of addressing modern slavery issues, all employees of the Companies undertook mandatory internal training in relation to modern slavery matters. Mandatory training sessions relating to human rights, ethics, anti-discrimination, sexual harassment, fraud and cyber security were also provided to all employees of the Companies.

Further, KOGAS promotes and requires the reporting of any instances or suspicions of any unethical behaviours. Each Company will consider the need for implementation of a modern slavery framework, encompassing specific internal policies and procedures targeted at addressing modern slavery practices and risks going forward.

In relation to secondees, KOGAS' human resources function ensures that the workers have the correct visa to work in Australia, including undertaking a visa condition check (VEVO). It is a precondition of their engagement that the workers have the legal right to work in Australia and they are engaged in line with Australian legislation and regulations. No issues have been identified to date.

c. Group initiatives

KOGAS has implemented a Human Rights & Ethics Management Practice Program, with the target of advancing as a global public enterprise leading the world by practicing people-centred integrity and ethics management, that respects human rights. In its commitment, KOGAS has implemented several key strategies such as: advancement of integrity & ethics management infrastructure; strengthening bailout system and prevent violation of human rights at work; and establishing an autonomous culture of integrity.

The initiatives to date comprise of a Declaration of Human Rights Management Charter and Pledge to Comply and the main contents contain 10 articles including support for international human rights policies and norms, prohibition of discrimination based on gender, race, religion, and disability, and prohibition of forced labour and child labour. Other initiatives include KOGAS Clean Point, the establishment of the Portal Site "Cheongahan" for Ethics Management, and publications of various newsletters and leaflets.

5 Assessing the effectiveness of actions

The Companies rely on their joint venture operators to assess the effectiveness of actions taken to respond to modern slavery risks in their operations and supply chains. The Companies commit to undertaking annual reviews of their venture operators' modern slavery statements, and if necessary, discussing any identified modern slavery concerns with the operators and joint venture partners.

The leadership conducts year-end reviews as a part of the annual disclosure review process for this statement and its recommendations. This review is endorsed by the board of directors of each Company in assessing the appropriateness of our performance and effectiveness.



Each Company encourages individuals to report, without fear of reprisal, any violations or perceived violations of the law or company policy, and raise any other questions or grievances they have, including in relation to modern slavery concerns. We also have appropriate systems in place to protect whistle-blowers via the anonymous hotline, Redwhistle Solution, a specialist independent third-party operated platform.

6 Any other relevant information

As our awareness of modern slavery issues grows, we continue 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.



7 Approval

In accordance with internal approval processes of Kogas Australia and Kogas Prelude:

- The directors of Kogas Australia have approved this statement on behalf of Kogas Australia and its subsidiaries on 30 June 2025.
- The directors of Kogas Prelude have approved this statement on behalf of Kogas Prelude on 30 June 2025.

This statement is signed by Sang Hyun Lim in his capacity as Managing Director of Kogas Australia.

This statement is signed by Kihong Kwon in his capacity as Managing Director of Kogas Prelude.