

MODERN SLAVERY STATEMENT

Statement for 2022

Santos

An aerial photograph of an industrial facility, likely an oil or gas processing plant, situated in a coastal area. The foreground is dominated by a large, rectangular array of solar panels. In the middle ground, several large, white, cylindrical storage tanks are visible, some with spiral ladders. The facility is surrounded by a dirt road and some smaller buildings. In the background, the ocean is visible, with a pier extending into the water and a few ships. The sky is clear and blue, suggesting a bright day.

We acknowledge the Traditional Owners of the land where we operate and work. We recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging.

DISCLOSURE NOTE

The submitting entity is Santos Limited which qualifies as a reporting entity under the *Modern Slavery Act 2018 (Cth)*.

This Statement covers all entities within the Santos Limited group and reports on the state of operations, supply chains, structure, governance framework and activities during the reporting period 1 January to 31 December 2022. All entities are covered by Santos' policies, procedures and systems, including those relating to contracting, purchasing and human resources.

Santos operates facilities for many joint ventures and is a participant with interests in joint ventures. The assessment of modern slavery risks in Santos' supply chain, as described in this Statement, includes suppliers engaged by Santos on behalf of its joint ventures. The modern slavery risks and impacts associated with projects which Santos does not operate, are not included in this Statement.

Modern slavery risks and impacts have not been assessed in jurisdictions where Santos does not actively operate oil and gas exploration or production operations, including Bangladesh, Vietnam (where it ceased all such operations) and Singapore (where Santos captive insurer is located). While Santos may still have had a presence in these jurisdictions in 2022, for example, for the purposes of progressing the closure of our offices in Bangladesh and Vietnam, Santos did not have any oil and gas exploration or production operations in these jurisdictions during 2022.

DISCLAIMER AND FORWARD-LOOKING STATEMENTS

This report contains forward-looking statements that are subject to risk factors associated with the oil and gas industry and the carbon capture and storage and carbon emissions reduction technologies industries. It is believed that the expectations reflected in these statements are reasonable, but they may be affected by a range of variables which could cause actual results or trends to differ materially, including but not limited to: price fluctuations on any products we produce, store, trade or capture, actual demand, currency fluctuations, geotechnical factors, drilling and production results, gas commercialisation, development progress, operating results, engineering estimates, reserves and resource estimates, loss of market, industry competition, environmental risks, carbon emissions reduction and associated technology risks, ESG-related issues including those relating to modern slavery or human rights more broadly, physical risks, legislative, fiscal and regulatory developments, economic and financial market conditions in various countries, approvals, conduct of joint venture participants and contractual counterparties and cost estimates. The forward-looking information in this report is based on management's current expectations and reflects judgements, assumptions, estimates and other information available as at the date of this document and/or the date of Santos' planning processes. There are inherent limitations with scenario analysis. Scenarios do not constitute definitive outcomes. Assumptions may or may not be, or prove to be, correct and may or may not eventuate, and scenarios may be impacted by factors other than assumptions made. Except as required by applicable regulations or by law, Santos does not undertake any obligation to publicly update or review any forward-looking statements, whether as a result of new information or future events.

Forward-looking statements speak only as of the date of this report or the date planning process assumptions were adopted, as relevant. Our strategies and targets will adapt given the dynamic conditions in which we operate; it should not be assumed that any particular strategies, targets or implementation measures are inflexible or frozen in time. No representation or warranty, expressed or implied, is given as to the accuracy, completeness or correctness, likelihood of achievement or reasonableness

of any forward-looking information contained in this report. Forward-looking statements do not represent guarantees or predictions of future performance, and involve known and unknown risks, uncertainties and other factors, many of which are beyond Santos' control, and which may cause actual results to differ materially from those expressed in the statements contained in this report.

PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

All subsidiaries within the Santos group are wholly owned. A list of our controlled entities is included in the 2022 Annual Report. The subsidiaries enter contracts, hold licences and permits, interests in projects and similar interests.

The subsidiaries all operate under the governance of Santos Limited and all share the same executive management who have been directly involved in our modern slavery risk management efforts. The directors for the majority of subsidiaries are the Chief Executive Officer and Chief Financial Officer of Santos Limited.

Santos has joint venture governance processes that involve regular engagement with joint venture partners and operators on key risks and their management, including modern slavery. Regular engagement occurs with our joint venture partners throughout the project lifecycle on key issues affecting project outcomes.

This includes participation in planning and budgeting, decision-making forums and assurance activities including those relating to managing potential modern slavery impacts.

This Statement has been prepared by subject matter experts in consultation with key Santos teams that collaborate to deliver our modern slavery risk identification, assessment, and management processes. In addition, the preparation of this Statement was overseen by our Modern Slavery Working Group, which includes inputs from procurement, legal, risk and audit, compliance, and the environment, sustainability, and governance teams. Through these processes, Santos Limited consulted its owned and controlled entities in developing this Statement.

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Statement from CEO and Board Chair

At Santos, our purpose and vision is to help to 'create a better world' for everyone. This includes our commitment to the identification, prevention and remediation of potential Modern Slavery risks and issues across our supply chain.

Modern Slavery is a serious human rights violation and crime under international law. It refers to many forms including forced labour, debt bondage, human trafficking, and forced marriage. It can occur in any country, industry, and can affect people of all ages, genders and nationalities.

Since releasing our first Modern Slavery Statement in 2019, we have pursued opportunities year-on-year to continuously improve our approach to identifying and responding to modern slavery risks. This Modern Slavery Statement outlines our progress against our 2022 action plan and provides an update on our 2023 - 2025 roadmap.

One of the key actions we undertook in 2022 was the focus on our development, communication and implementation of our [Human Rights and Modern Slavery Policy](#).

In addition, we worked to further enhance our engagements with our suppliers, matured our work in supplier due diligence assessments, trained our workforce, and engaged with our non-operated joint venture partners.

Throughout our Statement we showcase example case studies that demonstrate our ongoing commitment to addressing modern slavery and improving the lives of people in the communities in which we operate.

The preparation of our annual statement has allowed us time to reflect on the year past, and the year ahead where our ongoing commitment to the prevention of modern slavery within our supply chain will remain key for us as an organisation.

This statement has been approved by the Board of Santos Limited in their capacity as principal governing body of Santos Limited on 30 June 2023.



A handwritten signature in black ink that reads "K. T. Gallagher".

Kevin Gallagher

Managing Director and Chief Executive Officer



A handwritten signature in black ink that reads "K. Spence".

Keith Spence

Chair of Santos Limited Board

Our 2022 response to the mandatory reporting requirements

Modern Slavery Act 2018 (Cth)	Santos Response		Reference Page #
Mandatory Reporting Criteria	Detail		
Identify the reporting entity covered by the statement Section: Disclosure Note, Overview, Reporting Criteria 1 & 2	+ Reference to list of controlled entities and subsidiaries in Annual Report.		ii, 4
Describe the structure, operations and supply chain of the reporting entity covered by the statement Section: Reporting Criteria 1 & 2	<ul style="list-style-type: none"> + Organisational structure + Governance framework. + Santos Management System 	<ul style="list-style-type: none"> + Our people and values + Where we operate + Our supply chain, spend regions, annual procurement spend, what we procure, supplier map. 	3 - 8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity covered by the statement and any entities the reporting entity owns or controls Section: Reporting Criteria 1 & 2, Reporting Criteria 3	<ul style="list-style-type: none"> + Supply chain risk + Identified potential high risk suppliers and procurement categories + Our relationship to risk 	<ul style="list-style-type: none"> + Operational risk and modern slavery governance maturity + Tier 2 supplier data collections and risk prioritisation. 	10 - 13
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes Section: Reporting Criteria 4	<ul style="list-style-type: none"> + Integration of modern slavery risk management into policies, procedures and operations + Modern slavery action plan and three-year roadmap + Human Rights and Modern Slavery Policy + Implementation of supplier risk aggregation software + Focus on broader human rights risks in supplier assessments + Review of Responsible Sourcing Principles 	<ul style="list-style-type: none"> + Supplier risk prioritisation and due diligence, SAQs, risk-based reports and Corrective Action Plans (CAPs) + Local supplier support in PNG and Alaska + Tier 2 supplier data collection + Modern slavery training and education including on whistleblower and remediation processes + Joint venture partner engagement and collaboration. 	5, 14 - 16
Describe how the reporting entity assessed the effectiveness of actions taken to assess and address modern slavery risks Section: Criteria 5	<ul style="list-style-type: none"> + Program review/internal audit + Management meetings and board committee meeting review + Board sign-off + Definition of effective response 	<ul style="list-style-type: none"> + Qualitative and quantitative effectiveness indicators + Investigation and analysis of complaints and grievances + Internal consultation across all areas of operation. 	ii, 17 - 18
Describe the process of consultation with entities owned or controlled Section: Criteria 6	+ Consultation and engagement.		ii
Any other relevant information Section: Criteria 7	<ul style="list-style-type: none"> + Case studies + Ernst & Young Assurance report. 		19 - 21, 23 - 24

About Santos

Santos is a global energy company committed to increasingly cleaner energy and fuels production, with operations across Australia, Papua New Guinea, Timor-Leste and North America.

At Santos, our commitment is to be a global leader in the transition to cleaner energy and clean fuels, by helping the world decarbonise to reach Net Zero in an affordable and sustainable way.

Santos is one of Australia's biggest domestic gas suppliers and a leading LNG supplier in the Asia Pacific region. We are committed to supplying critical fuels such as oil and gas in a more sustainable way by decarbonising our own activities with projects such as the Moomba CCS Project and our customers and other emitters by offering decarbonisation services through our Energy Solutions business. For more than 65 years, Santos has been working in partnership with local communities, providing local jobs and business opportunities, safely and sustainably developing natural gas resources, and powering industries and households. As customer demand evolves, Santos plans to grow and develop our cleaner energy and clean fuels, including hydrogen and synthetic methane, utilising carbon capture and storage technologies in addition to nature-based offsets, energy efficiency and use of renewables in our operations.

Underpinned by a diverse portfolio of high-quality, long-life, low-cost oil and gas assets, Santos seeks to deliver long-term value to shareholders. With a strong, low-cost base business supplying oil and gas, and a transition plan to decarbonise and develop cleaner

energy and clean fuels, Santos remains resilient, value accretive and at the leading edge of the energy transition.

In 2022, to deliver the transition and our new purpose and vision, Santos announced a restructure of the business into two divisions, Upstream Gas and Liquids and Santos Energy Solutions. Santos Energy Solutions, a new business building on the Energy Solutions team set up in 2017, is the next step in our plans to build our transition business, including our decarbonisation and carbon management services business, on our path to a cleaner energy future.

Our organisational structure

Santos is an Australian public company, ACN 007 550 923. The registered office for Santos is 60 Flinders Street, Adelaide, SA 5000. Santos has a workforce of approximately 4,500 people including employees, establishment contractors and apprentices. In 2022 we spent \$4.16 billion on goods and services globally with approximately 4,700 suppliers.

Santos' shares are listed on both the ASX and PNGX. We continue to participate in joint ventures across our portfolio as an operator and/or participant.

Owned and controlled entities: A list of our entities is provided in our [2022 Annual Report](#). Subsidiaries enter contracts, hold licences and permits, interests in projects and similar interest. The subsidiaries all operate under the direction and governance of Santos. The directors for the majority of the subsidiaries are the Chief Executive Officer and Chief Financial Officer of Santos Limited.

Santos' purpose is to provide cleaner energy that is both affordable and sustainable to help create a better world for everyone



Our governance framework

Corporate governance is critical to the long-term sustainability of Santos. The Board and management are committed to maintaining and enhancing a strong corporate governance framework that underpins our new purpose and vision.

Our robust corporate governance framework supports the decision-making, processes and culture underpinning the longer-term success of Santos.

The Board is responsible for setting the purpose and vision, strategic direction, values and policies including goals in relation to sustainable development.

Modern Slavery initiatives are overseen by our Environment, Health, Safety and Sustainability Board Committee. The Committee's duties comprise the governance and review of our activities in the areas of Environment, Health and Safety, Security, Climate Change, Anti-Slavery, Human Rights, Land Access, Indigenous Engagement and Participation and Cultural Heritage and Communities.

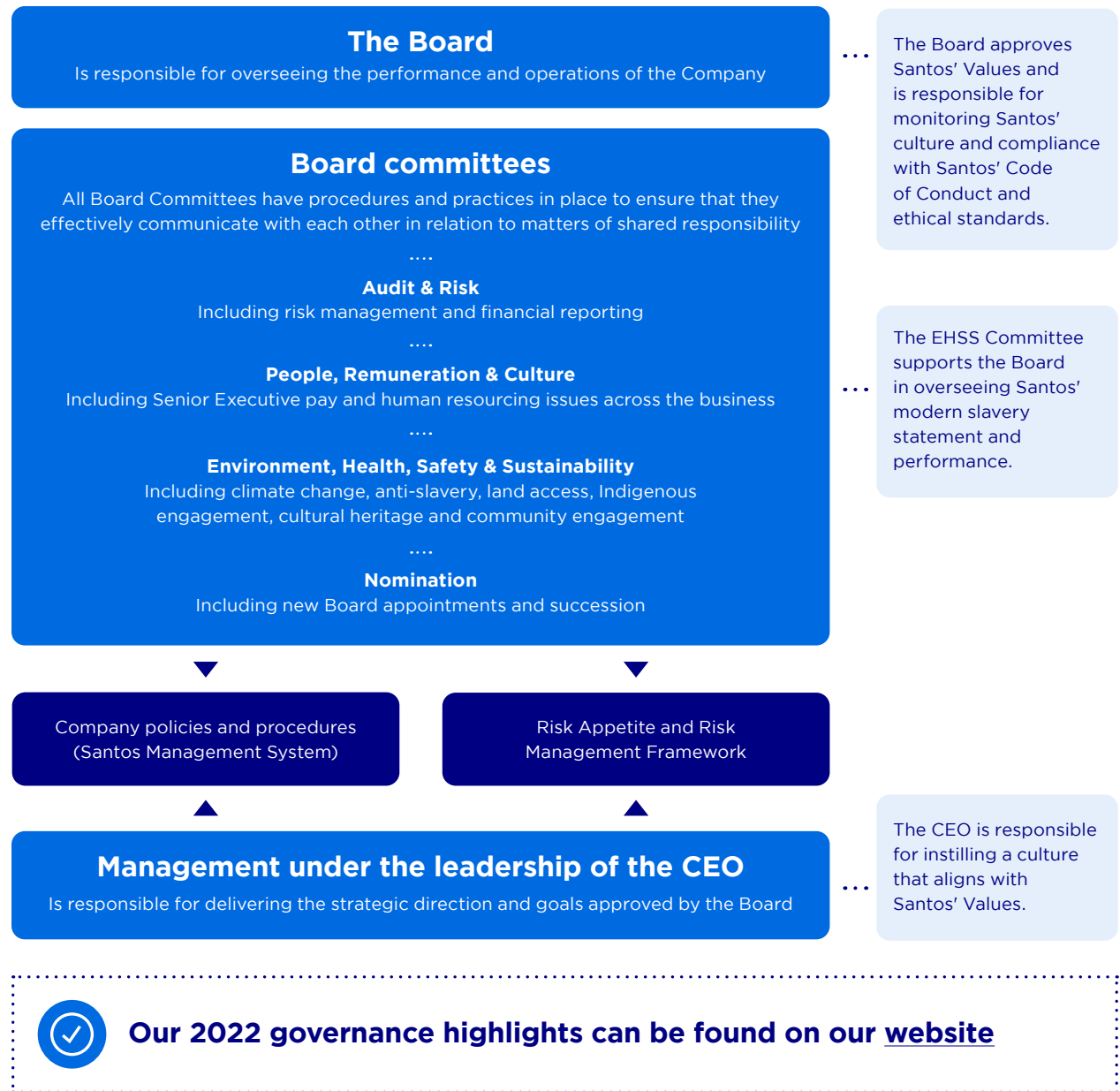
For further information on our governance framework refer to our [2022 Sustainability Report](#).

Understanding this report

This report provides an overview of Santos' modern slavery approach and performance for calendar year 2022.

Information and data provided within this report is predominantly presented on a gross operated basis.

All references to dollars, cents or \$ in this document are to US currency, unless otherwise stated. Where currency conversions have been undertaken, a 12-month average conversion factor for the calendar year has been used. In this report, unless otherwise stated, references to "Santos", "our", "us" or "we" refer to Santos Ltd and its controlled entities, details of which can be found in our [2022 Annual Report](#).



Code of Conduct

The Santos [Code of Conduct](#) describes how we put our commitment to be a good corporate citizen into practice every day, and sets out the mandatory standards - how we interact with others, how we make decisions, the actions we take and the way in which we carry out our work.

Santos is committed to holding all of our people and any person who performs work, or provides services to Santos, accountable to the Code of Conduct and its supporting procedures. We also seek to positively influence supplier behaviour, consistent with the standards established by the Code. As a condition of employment or engagement at Santos, Santos personnel must complete the online Code of Conduct training on induction and annual refresher training.

Management systems and processes

The Santos Management System (known as the SMS) applies to all of Santos' people and sets out the minimum mandatory requirements regarding how we manage the business including how we manage modern slavery risks. It is designed to protect the workforce, communities where we operate, and the environmental values associated with our portfolio of assets, operations and activities.

The SMS comprises:

- + Policies and Code of Conduct
- + Operating Standards explaining the minimum standards
- + Procedures, technical standards, processes and tools explaining the expectations and practices for 'how' business activities should be undertaken.

Several policies and procedures are publicly available on the Santos [website](#).

Case study 1 Foundation implements safeguarding procedures

[Read the case study on page 19](#)



Reporting Misconduct (Whistleblower) Procedure

Eligible whistleblowers, which includes our own employees, contractors, suppliers, and external stakeholders are required to immediately report suspected or actual contravention of the Code of Conduct, including contraventions which involve illegal activity such as fraud, theft or corruption in line with our Reporting Misconduct (Whistleblower) Operating Standard. This means directly to General Counsel, Company Secretary, Executive Vice President People and Culture, Manager of Risk and Audit, any other Eligible Recipient or via our external, confidential 24 hour Reporting Misconduct Hotline. Allegations of misconduct are assessed by the General Counsel and

Executive Vice President People and Culture to provide recommendations for investigation to the Managing Director and CEO.

Santos has a confidential whistleblower process in place for all staff, suppliers, external stakeholders, and contractors and any issues are reported at every meeting of the Board's Audit and Risk Committee.

In 2022, a total of 24 whistleblower reports were received and investigated.

There were no reports of modern slavery related issues.

Our operations

Our assets and development opportunities

Santos' principal activities during 2022 were the exploration, development, production and marketing of hydrocarbons, as well as progressing technologies that support the supply of cleaner energy, including carbon capture and storage (CCS). The Company's revenue is primarily derived from the sale of gas and liquid hydrocarbons.

Detailed information on where and how we operate is available in our [2022 Sustainability Report](#).

Santos Energy Solutions

Santos Energy Solutions business includes midstream processing of Santos' and third-party gas and liquids. It aims to provide decarbonisation and carbon management services and develop clean fuels as the market and customer demand evolves. Santos Energy Solutions will earn revenue from the midstream processing, decarbonisation and carbon management services and the sale of clean fuels. It will not earn revenue from the sale of hydrocarbons.

Midstream infrastructure portfolio

Santos has a unique portfolio of strategic midstream infrastructure assets. The midstream division of our business involves gas processing, storage, transport and liquefaction assets.

CCS and clean fuels hubs

At Santos, we aspire to be a leading carbon capture storage (CCS) infrastructure provider and to be a leading provider of clean fuels and carbon reduction services. We are currently working on plans to develop a three hub CCS and clean fuels strategy that incorporates our Moomba, Darwin and Bayu-Undan and Western Australia projects.

Santos Carbon Solutions

Santos Carbon Solutions is developing a portfolio of carbon abatement projects to address the residual emissions from our facilities, creating local employment opportunities on sustainable projects.



- ◆ UPSTREAM PROJECTS
- OPERATED FACILITIES
- NON-OPERATED FACILITIES
- PLANNED PROJECT LOCATIONS
- PLANNED CCS AND CLEAN FUELS HUBS
- Major Santos Office Locations

Upstream Gas and Liquids

Our Upstream Gas and Liquids business includes three LNG projects in the Asian region (PNG LNG, Gladstone LNG, and Bayu-Undan and Barossa to Darwin LNG) and two Australian domestic gas businesses (west and east coast). The Upstream Gas and Liquids business earns revenue from the sale of hydrocarbons.



PNG LNG

1

Santos has been active in Papua New Guinea since the 1980s, with interests in PNG LNG and Papua New Guinea producing oil fields and potential development projects with Papua LNG and P'nyang Gas Project.



Bayu-Undan and Barossa to Darwin LNG

2

When Bayu-Undan ceases production, the Barossa gas field will be the source of gas to backfill Darwin LNG. Barossa is one of the lowest-cost LNG supply projects in the world and will give Santos and Darwin LNG a competitive advantage in a tightening global LNG market.



Gladstone LNG

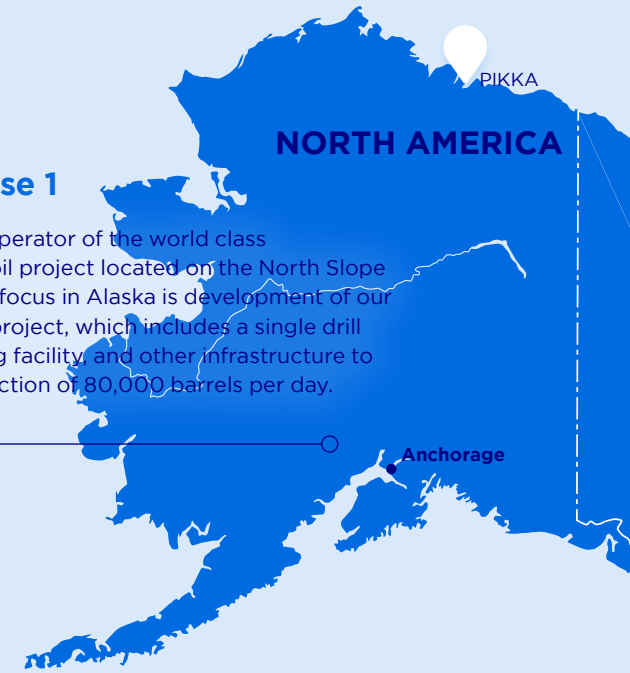
3

In Queensland, Gladstone LNG feed gas is sourced from the Surat and Bowen Basins, Santos portfolio gas and third-party supply.



Pikka Phase 1

Santos is the operator of the world class Pikka Phase 1 oil project located on the North Slope of Alaska. Our focus in Alaska is development of our Pikka Phase 1 project, which includes a single drill site, processing facility, and other infrastructure to support production of 80,000 barrels per day.



Australian Domestic West Coast

4

Santos is one of Western Australia's major domestic gas suppliers. We have a strategic infrastructure position in WA with interests in three of the State's major domestic gas plants at Varanus Island, Devil Creek and Macedon.

Australian Domestic East Coast

5

Santos' domestic east coast gas portfolio includes the Cooper and Eromanga Basins as well as our non-operated eastern Queensland production.

Our supply chain

Our supply chain consists primarily of large oil and gas field engineering, operations, construction and technical services, marine logistics and transportation, specialist consultancies and labour and corporate services.

Major categories of goods and services we consistently procure year on year include:

- + Building, construction, and fabrication services
- + Offshore services
- + Plant and equipment
- + Construction and building materials and consumables
- + Utilities (Water, electricity and gas)
- + Remote camps, catering, accommodation, and cleaning
- + Maintenance services
- + Professional services
- + Logistics, transport and warehousing
- + Marine and aviation support services
- + Wellsite services
- + Labour hire and recruitment services
- + ICT hardware and software
- + Production operations and support.

In 2022, Santos spent \$4.16 billion with approximately 4,700 suppliers. This is an increase of \$1.38 billion from total spend reported in our 2021 Modern Slavery Statement, largely due to the merger with Oil Search and expenditure on major capital growth projects. We spent \$3.77 billion with 525 Tier 1 (direct) suppliers with annual spend above \$1,000,000 AUD or ~\$700,000 USD.

Our annual procurement spend

In 2022, we spent approximately \$3.24 billion with Australian based suppliers, an increase of \$810 million from our 2021 statement. This represents 78 per cent of the Santos annual procurement spend being spent with Australian suppliers.

In Australia, we work closely with our key suppliers many of whom are in regional communities. We aim to partner with local business and other organisations to listen, support, invest, create jobs and build skills for the future.

In addition to our Australian-based suppliers, 22 per cent of our total spend is with overseas suppliers

operating in approximately 40 countries. 90 per cent of our overseas suppliers with whom we spend more than ~ \$700,000 USD annually are located in just five countries, being Singapore, PNG, United States, Canada and Thailand.

Globally, Santos' total procurement spend is separated into four main operational spend regions: Northern Australia and Timor Leste, Papua New Guinea, North America (Alaska) and the balance being in Australia. The number of suppliers and spend within each of these regions (as a percentage of total spend) is summarised on the next page.



\$4.16 billion
spent with approximately
4,700 suppliers



\$3.24 billion
with Australian
based suppliers

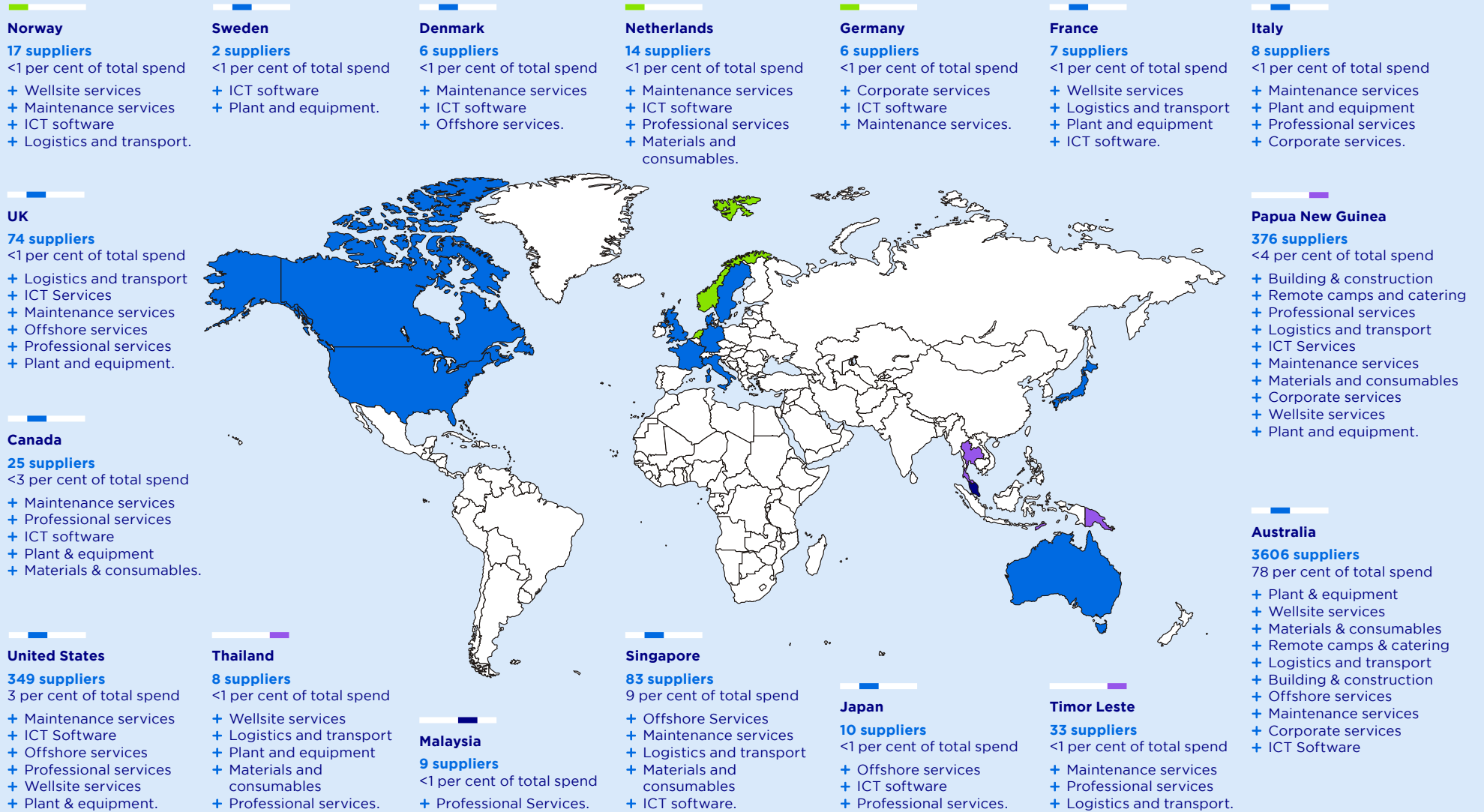


Annual spend
~\$700,000 with 525
Tier 1 suppliers



78 per cent of our
annual procurement spend is
with Australian suppliers

Santos Tier 1 supplier locations >A\$1 million per country



Modern slavery risks in operations and supply chain

Santos operating model and relationship to potential modern slavery risk

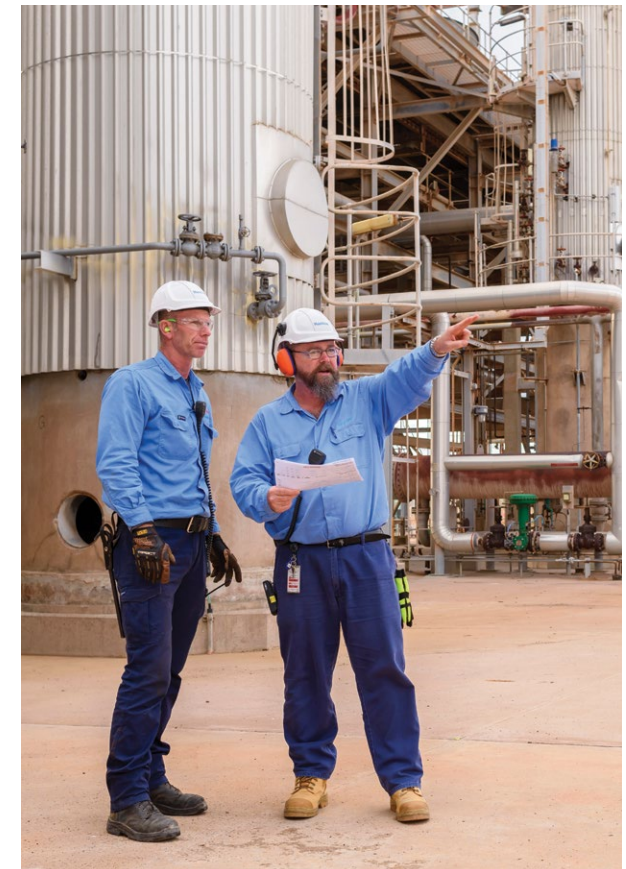
The Modern Slavery Act 2018 (Cth) defines modern slavery as including forced labour, debt bondage, deceptive recruiting for labour or services, trafficking in persons, slavery, the worst forms of child labour, servitude and forced marriage. Through our commitment to assessing our relationship to modern slavery risks, we work to align with the principles in the UNGPs to better understand how we may cause, contribute to, or be directly linked to modern slavery and other human rights impacts through our operations, business relationships and supply chain.

We acknowledge that whilst relatively low risk, our Australian operations potentially contain areas of vulnerability relevant to modern slavery, particularly around our outsourced services such as cleaning, catering, security and facilities management, and use of labour hire contractors. We aim to review the potential risks in these areas as part of our regular due diligence processes outlined in this Statement. Additionally, we aim to enhance our operational due diligence processes

to better assess any potential modern slavery risks in our PNG operations. Each of our assets present their own issues and risks. We have undertaken a preliminary assessment of our relationship to this risk based on the cause-contribute-directly linked framework outlined in the UNGPs, represented graphically below.

The Santos integrated risk management framework combined with our supplier risk prioritisation and assessment process, training and awareness courses, and stakeholder engagement initiatives, ensure we can identify, assess, and address potential modern slavery risks on an ongoing basis.

We continue to focus on assessing and addressing our supply chain risks by prioritising, engaging with and assessing our potentially highest risk Tier 1 and Tier 2 suppliers. We recognise that there are potential risks of involvement in modern slavery across our business relationships, including our joint venture operations and procurement of goods and services across our extended supply chain.



Santos operating model and relationship to potential modern slavery risks



Supply chain risks

We updated our supplier risk prioritisation dashboard for the 2022 reporting period. To ensure continuity with our previous statements, potential risk for modern slavery was assessed against the following indicators:

- + **Industry sector** – specific industry sectors deemed as high-risk in international and national guidance documentation. This includes sectors with high-risk business models such as use of labour hire workers and outsourcing
- + **Commodity/product** – specific products and commodities or raw materials deemed as high-risk by the US Department of Labor’s 2022 List of Goods Produced by Child and Forced Labor, the [Global Slavery Index \(GSI\)](#) and other international guidance materials
- + **Geographic location** – based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI and using the *SD Strategies* country risk matrix which assesses risks against 14 global indices. High-risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State’s failure to protect modern slavery. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters
- + **Workforce profile** – in undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where base-skill, vulnerable or migrant labour is used. We referenced the Global Slavery Estimates 2022 report in assessing worker vulnerabilities in our supply chain.

We acknowledge that there are common modern slavery practices connected to the resources sector, including human trafficking, forced or unpaid work, bonded labour and the worst forms of child labour. These are exacerbated by high-risk geographies, low visibility over multi-tiered supply chains and the demand for base-skill workers and third-party contractors in the construction of infrastructure and civil works. The impact of Covid-19 has further exacerbated these risks and vulnerabilities.

As with the 2019, 2020 and 2021 statements, the focus in 2022 continued to be on suppliers with annual spend above ~\$700,000USD.

We acknowledge that lower spend suppliers also present modern slavery risks and are committed to undertaking Modern Slavery assessments of suppliers with spend between \$140,000USD to \$700,000USD in high-risk supply categories including specifically security services in our PNG operations.

We are also considering ways to broaden our knowledge of risks in lower spend categories and explore the possibility of conducting due diligence reviews of higher risk, lower spend suppliers in 2024 within our Tier 1 and 2 suppliers.

In 2022 we continued to build on our understanding of risk in our extended supply chain which started in the 2020 and 2021 reporting periods (see case studies in Santos Modern Slavery Statement 2020, Page 17 and Santos Modern Slavery Statement 2021, Page 32). Findings of our latest round of Tier 2 supplier assessments are summarised in case study 2.

Case study 3 Investigating potential risk across Tier 2 suppliers

[Read the case study on page 20](#)



Risk by supplier

Analysis of \$3.77 billion of 2022 spend across Santos' supply chain (525 suppliers with spend above \$700,000) identified 39 per cent of spend (or 190 suppliers) as potentially high risk for modern slavery.

During 2022, supplier due diligence including supplier engagement and deep dive risk assessments occurred with 17 of our potentially highest-risk suppliers (see case study 3), resulted in two suppliers scoring a low residual risk rating, nine suppliers being classified as medium risk and six suppliers determined to have a higher residual risk. Our procurement team will continue to work with our suppliers, focusing on those scoring a high residual risk rating to ensure identified corrective actions are implemented.

The due diligence initiatives outlined above, coupled with the implementation of corrective action requests has reduced our assessment of overall high risk spend from 39 per cent to 25 per cent in 2022. This approach to the risk management has provided a consistent outcome with the findings reported for our 2021 supplier due diligence program (see also case study 3 Santos Modern Slavery Statement 2021, page 24).



Overall high risk
spend reduced from
39 per cent to 25 per cent

Risk by procurement category

Based on the four supply chain risk indicators outlined above, approximately one-third of our procurement categories (i.e., 11 out of 30 categories) present a higher risk for modern slavery. Major categories of potentially high risk spend are:

- + Building, construction, and fabrication services
- + Operational consumables, materials, and supplies
- + Plant and equipment and machinery
- + Production facility maintenance services
- + Logistics including land transport and marine services
- + Camps and camp services such as catering and hospitality
- + Building and engineering materials
- + Waste management and recycling
- + Labour hire
- + ICT hardware, electrical components, and equipment
- + Real estate and building services such as cleaning and maintenance.

Higher levels of modern slavery risk associated with these spend categories is due to country of manufacture (primarily China and other parts of Asia), the industry sectors involved (building, construction, services, hospitality, logistics, facility management, security, and manufacturing), commodities used (metal, plastic, chemicals etc) and in some instances, the use of base skilled and potential vulnerable workers.

While the risk of modern slavery in Australia is lower than many other jurisdictions (according to GSI data), we recognise that our Australian suppliers (who make up 78 per cent of our total spend) provide us with goods and services across all high-risk categories and thus will require further engagement and assessment.

High-risk goods and services across building / construction / fabrication, consumables, logistics and labour hire categories are also procured directly from international suppliers across Asia, Europe and North America. We are exploring ways to gain a better understanding of potential risks in our extended supply chain, including those related to the goods and services procured by our Tier 1 suppliers both in Australia and internationally.

Case study 4 Reducing potential risk through supplier due diligence and risk assessments

[Read the case study on page 21](#)



Actions taken to assess and address risk

In 2022 our focus was on further integrating modern slavery risk management processes into the policies, procedures, and operations of our merged entity.

We also endeavoured to better understand the risks of modern slavery presented by our highest spend suppliers and undertook both shallow-dive and deep-dive desk top risk assessments of these suppliers with spend greater than \$700,000.

Our 2022 modern slavery risk management activities are outlined here.

Case study 2 Roll out of updated Modern Slavery eLearning Course

[Read the case study on page 19](#)



Procurement & supply chain

How we assess and address the risk of modern slavery (and broader human rights) in our supply chain and business relationships.

Activity in 2022

Responsible Sourcing Principles: Our Responsible Sourcing Principles were reviewed for potential future implementation.

Supplier risk prioritisation: We undertook supplier risk mapping across the merged group procurement and prioritised suppliers and supply categories against spend and modern slavery risk indicators. We further updated our supplier risk prioritisation, considering the results of our supplier deep dive assessments and other due diligence programs.

Integrating human rights risk assessment into supplier due diligence: Working collaboratively across our organisation and with the help of external experts, we integrated broader human rights risk assessment into our shallow dive supplier questionnaires which will be reviewed and reported in our 2023 Statement.

We aim to expand our deep dive modern slavery supplier due diligence questions in 2023, to enable us to assess and address broader human rights issues and impacts across our extended supply chain.

Supplier engagement and deep dive surveys: We engaged 17 suppliers who were provided with detailed reports and recommendations which have informed Corrective Action Plans (CAPs) and ongoing supplier engagement (see case study 3).

Tier 2 supplier data collection: The supplier risk assessment questionnaires include a requirement for suppliers to provide names of their direct suppliers within the Santos extended supply chain. Through this process we identified an additional 56 Tier 2 suppliers in 2022, bringing the total number of Tier 2 suppliers identified since 2020 to 173 across six major procurement categories.

Of the 56 Tier 2 suppliers identified in 2022, 84 per cent are categorised as potentially high risk (see case study 2).

We plan to work with our Tier 1 suppliers to further engage priority Tier 2 suppliers throughout 2023.

Local supplier support: We continued to work with local suppliers in Alaska Native Corporation and PNG Landowner Companies (Lancos). We invited our two largest and most influential Lancos suppliers in PNG to participate in our modern slavery supplier questionnaire process. Working closely with our Community Team in PNG, we engaged the Lancos, supported them through the SAQ process and provided a report of gaps and opportunities for enhanced modern slavery risk management and due diligence in their own operations. We will continue to work with PNG Lancos to support the implementation of improvement opportunities in 2023.

Governance & due diligence

How our modern slavery risk management initiatives are integrated and enabled across our organisation, including our review and improvement processes.

Activity in 2022

Modern slavery action plan and roadmap: We reviewed and refined our action plan and road map to ensure new and emerging issues are addressed. A key example is prioritising the identification of modern slavery risks associated with future potential areas of work such as decommissioning.

Human Rights and Modern Slavery Policy: Our Policy was approved by the Santos Board in April 2022 and is available on our website [here](#). The Policy documents our commitment to supporting the wellbeing, dignity and human rights of our employees and contractors, the communities in which we operate, and the people impacted by our operations, including those that provide goods and services to Santos. The Policy provides an overview of the actions we will take to ensure our approach to managing potential modern slavery and human rights impacts reflects our values, Code of Conduct and other relevant policies.

Integration of modern slavery risk management approaches into merged company operations: During 2022 we consulted and engaged staff and management across our merged operations to ensure all assets are operating under the Santos Management System. This involved extensive engagement with staff in our PNG and Alaska operations on our approach to modern slavery risk management and ensuring integration of modern slavery risk management processes into existing systems. This was completed in Alaska and PNG in Q2 2022.

Risk management

How we integrate modern slavery and broader human rights risk assessments into our enterprise risk framework.

Activity in 2022

Risk software: In 2021 we researched and successfully sourced supplier risk aggregation software, which was officially implemented in 2022. Suppliers are required to complete a tender response schedule and the software helps flag suppliers against reported human rights/modern slavery instances, as well as sanctions watchlists and media reports.

Grievance mechanisms & remediation

How we enable stakeholders to report instances of modern slavery safely and effectively and what processes would be followed where instances are reported (whether in our operations or supply chain).

Activity in 2022

We continue to promote our independent, confidential, external 24-hour hotline for workers, including those working for our contractors and suppliers, to freely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct.

Information about the Whistleblower Hotline is included on our dedicated supplier information page on our website [here](#).

Our updated internal eLearning course includes links to our whistleblower hotline.

Engagement, training & education

How we build awareness and understanding of modern slavery among our workforce and engage external stakeholders.

Activity in 2022

Modern slavery awareness training: We updated our modern slavery eLearning module to incorporate key modern slavery risks and opportunities across our new areas of operation – PNG and Alaska. The module was rolled out to staff across all of Santos' assets, focusing specifically on key merged group roles (see case study 2).

In 2022 348 people completed our initial modern slavery training module.

Joint venture partner engagement and collaboration: We continued to explore opportunities to deepen our engagement with joint venture partners and non-controlled entities on responsible sourcing and modern slavery risk management. A letter and questionnaire were issued to joint venture partners and our non-operated assets to better understand our joint venture partners' approach to the management and elimination of potential modern slavery risks.

Our three-year modern slavery risk management road map*

2023

- + Review and refine road map to ensure new and emerging risks are addressed
- + Review modern slavery due diligence through our procurement processes and consider integration of broader human rights risks
- + Review current systems to ensure modern slavery risk are assessed effectively
- + Work with priority suppliers to implement corrective actions arising from 2022 deep dive assessments
- + Expand supplier engagement and communications strategy
- + Undertake regular engagement and awareness raising or education initiatives with priority Tier 1 suppliers
- + Support identified strategic and highest risk suppliers with additional capacity building
- + Continue to roll out updated modern slavery awareness training to priority staff across Australian and international operations
- + Continue to review our processes for effective management of modern slavery impacts
- + Review outcome of industry wide consultation on proposed legislative changes
- + Continue to respond to actions arising from legislative reviews.

2024

- + Update modern slavery program to reflect identified new risks and revised legislative reporting requirements (as required)
- + Implement further modern slavery and broader human rights risk assessments for priority suppliers
- + Identify opportunities for building modern slavery risk management capacity among lower spend suppliers
- + Extend supply chain risk mapping to highest risk products or services (beyond Tier 1 and Tier 2 suppliers)
- + Integrate modern slavery training into contract mobilisation / contractor onboarding processes
- + Review and consider grievance and remedy process to include location specific mechanisms and responses
- + Consider potential industry collaboration forums for shared learnings.

2025

- + Conduct broad strategic effectiveness review of Santos' modern slavery risk management program
- + Undertake physical audits across key suppliers
- + Undertake additional supplier audits where required of our highest risk Tier 1 and Tier 2 suppliers
- + Update online training course to reflect legislative changes in Australia and internationally
- + Seek to consult with key stakeholders on effectiveness of whistleblower hotline and other grievance mechanisms
- + Implement key collaboration opportunities identified.

* This roadmap is a statement of present intention and actions and timings may change between now and the relevant period, please refer to the general disclaimer for more information

Areas of focus

Governance & due diligence

Risk management

Procurement & supply chain

Engagement, training & education

Grievances & reporting

Effectiveness assessment

Santos' modern slavery risk management action plan and due diligence processes are regularly reviewed through reporting to the Environment, Health, Safety and Sustainability Board Committee.

The Committee's duties include policy review, monitoring effectiveness of the management system and risk framework, maintaining corporate knowledge of risks relevant to modern slavery, and reporting and making recommendations to the board as required.

In addition, Santos has a Modern Slavery and Human Rights Working Group which consist of senior representatives from various functions across Santos. The Working Group meets bi-monthly and has the responsibility of overseeing the implementation of initiatives and actions outlined in the Modern Slavery Statement.

At Santos, we consider an effective response to modern slavery risk management to include:

- + Strong Modern Slavery Governance: A strong modern slavery governance framework and commitment to accurately identifying and remedying where appropriate modern slavery vulnerabilities and cases
- + Assessment, Management & Reporting: Effective and transparent assessment and reporting of modern slavery risks across our operations and supply chain, including tracking the number of modern slavery risks identified, issuing corrective action requests to our suppliers, and ensuring improvements are implemented
- + Engaged Staff and Suppliers: Engaging with our suppliers beyond contractual obligations and awareness of our ethical sourcing principles. This includes empowering our procurement team

members to engage with our potentially highest risk suppliers to build trusted relationships ensuring our expectations are met and corrective action requests are implemented in timeframes acceptable to both parties.

In 2022, Santos successfully implemented the vast majority of our planned actions and continue to assess the effectiveness of our actions against the following qualitative and quantitative indicators. We plan to address uncompleted actions for 2022 in 2023.



Our 2022 effectiveness indicators

Area of focus	Activity	Qualitative indicators	Quantitative indicators
Governance & due diligence	<ul style="list-style-type: none"> + Code of Conduct + Integration of policies, standards and processes across merged company group + JV partner awareness + Management system implementation and review + Human Rights and Modern Slavery Policy + Human Rights and Modern Slavery Working Group re-established. 	<ul style="list-style-type: none"> + Review inclusiveness of the language used to ensure that the Code of Conduct is accessible and relevant to all members of Santos + Modern Slavery rights included in company policies and procedures + Engagement and education of JV partners + Maturity assessment targets documented + Terms of Reference reviewed and agreed by all parties. + Actions and initiatives tracked and monitored. 	<ul style="list-style-type: none"> + Number of code breaches recorded relating to modern slavery + Per cent policies reviewed, updated and integrated + Number of JV partner meetings held + Number of modern slavery maturity targets achieved + Number of working group meetings + Number of actions achieved.
Risk management	<ul style="list-style-type: none"> + Strengthened tendering documentation for modern slavery risk considerations + Risk assessments undertaken on modern slavery and labour rights risks. 	<ul style="list-style-type: none"> + Enhanced understanding and discussion of human rights and modern slavery risks + Increased understanding across workforce on potential modern slavery and human rights risks in different operating environments. 	<ul style="list-style-type: none"> + Deep dive questionnaires sent to potential highest risk suppliers + Number of corrective action requests issued and completed.
Procurement & supply chain	<ul style="list-style-type: none"> + Shallow dive supplier risk assessments + High-risk supplier screening + Identification of Tier 2 suppliers + Supplier qualification processes + Supplier engagement. 	<ul style="list-style-type: none"> + Engagement and education of suppliers + Shallow dive questionnaires sent to all potentially high-risk suppliers + Risk themes identified in supplier responses to questionnaires. 	<ul style="list-style-type: none"> + Per cent suppliers engaged + Per cent supplier responses to shallow dive survey + Per cent suppliers responding to deep dive assessments and uploading supporting documentation
Engagement, training & education	<ul style="list-style-type: none"> + Employee, management and executive engagement and training + Santos specific eLearning module to include risks in new jurisdictions. 	<ul style="list-style-type: none"> + Staff participation in training + Enhanced organisational awareness of modern slavery risks - including increased discussion among all personnel + Engagement of joint venture and other business partners. 	<ul style="list-style-type: none"> + Per cent working group senior executive staff completed training + Per cent of contract representatives completed training + Number of information session held for key procurement leads.
Grievances & reporting	<ul style="list-style-type: none"> + Reporting hotline (whistleblower) + Modern Slavery Statement. 	<ul style="list-style-type: none"> + Reporting hotline actively communicated + Alignment of grievance mechanism to UNGPs + Modern Slavery Statement submitted on time. 	<ul style="list-style-type: none"> + Total number of issues raised + Per cent of issues effectively addressed + Number of stakeholder engagements held on grievance and remedy.

Other information

Case study 1

Foundation implements safeguarding procedures

In late 2021 the Oil Search Foundation commenced the development of a detailed policy and procedure for managing the prevention of sexual exploitation, assault, and harassment (known as PSEAH) using the Australian Government's Department of Foreign Affairs and Trade PSEAH as a template.

A safeguarding expert was recruited to work with the Foundation and the Santos People and Culture business team in Port Moresby to design the policy and to pilot training for Foundation and Santos PNG team members and contractors. The potential for sexual exploitation and trafficking women and girls is a recognised risk in resource project sites globally. The new PSEAH policy and reporting procedure was approved by the Foundation's Board in 2022 and training is being rolled out across the company's PNG sites in 2023.



Case study 2

Roll out of updated modern slavery online training course

During 2022 Santos reviewed its bespoke modern slavery online training course developed in 2021 to ensure it effectively considers the risks posed by our expanded footprint in PNG and our development opportunities in North America.

As a consequence of the review, the course was updated to include detailed information on modern slavery risks and vulnerabilities across all our operations, including areas where we are involved in joint venture partnerships.

Specific information and links have been added to the training module where new policies and procedures have been developed (such as our Human Rights and Modern Slavery Policy). The training course also includes an expanded section on our Reporting Misconduct (Whistleblower) Hotline and associated reporting.



Case study 3

Investigating potential risk in Tier 2 suppliers

In 2020 and 2021 Santos undertook Tier 1 supplier deep dive assessments which identified 117 Tier 2 suppliers (our suppliers' suppliers). A high-level risk analysis was conducted of these 117 suppliers, considered crucial to the delivery of Tier 1 supplier contracts with Santos (see Page 17, Santos Modern Slavery Statement 2020, and Page 32 Modern Slavery Statement 2021).

Santos undertook a third round of supplier deep dive assessments in 2022 which identified an additional 56 Tier 2 suppliers used to support the delivery of goods and services to Santos. We conducted a similar high level risk analysis of these Tier 2 suppliers, with results included below:

+ 84 per cent of Tier 2 suppliers in Round three were ranked as potentially high-risk for modern slavery (58 per cent were high-risk in the 2020 analysis and 75 per cent in the 2021 analysis). Note that the higher per cent of potentially high-risk Tier 2 suppliers in 2022 is due to changing spend profile (particularly in PNG) and significant monies being spent on major growth capital.

+ Major high-risk Tier 2 supply categories are:

- + Camp services and supplies
- + Plant and equipment
- + ICT hardware and electronic components
- + Logistics: land transport and marine services
- + Building and engineering materials
- + Operational materials, consumables and supplies.

The increased visibility of our Tier 2 suppliers confirms the level of risk within our Tier 2 suppliers is greater than among our direct suppliers. In 2023, we will work closely with our Tier 1 suppliers to engage and educate key Tier 2 suppliers to manage collective risk across our extended supplier network.



Case study 4

Reducing potential risk through supplier due diligence and risk assessments

The [Santos 2020 and 2021 Modern Slavery Statements](#) document the outcomes of the SAQs conducted with potentially high-risk suppliers accounting for 75 per cent of the annual high-risk spend >\$700,000.

In 2022 Santos extended its supplier due diligence program to include an additional 17 potentially high-risk suppliers who together with suppliers previously assessed, account for approximately 96 per cent of the annual high-risk spend (for suppliers with spend \$700,000).

Suppliers from the following high-risk categories were invited to complete the SAQ:

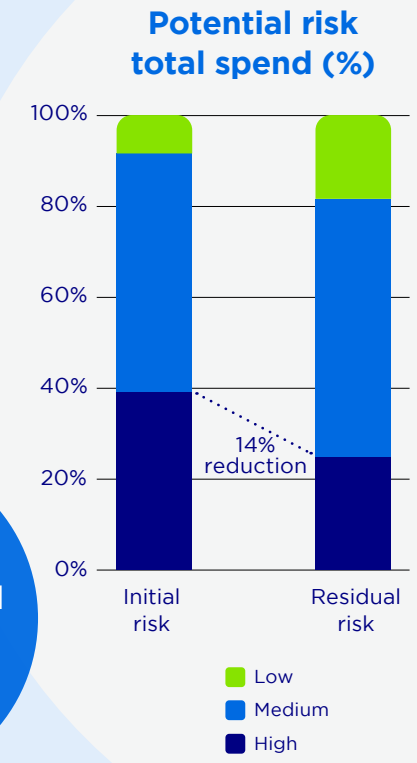
- + Operational consumables / materials
- + Production facility maintenance services
- + Logistics (land transport and marine services)
- + Offshore services
- + Building, construction and fabrication services
- + Labour hire
- + Remote camps supplies and services.

Key findings are consistent with the 2020 and 2021 supplier SAQ findings. Supplier due diligence including supplier engagement, deep dive risk assessments, review of documentation, and implementation of corrective action requests resulted in a 14 per cent reduction in total spend classified as high-risk in 2022 (39 per cent down to 25 per cent).

Santos is committed to continuing to work with our supplier network including finding new ways to engage, identify, assess, and mitigate risks posed by our suppliers' activities.

Risk-based reports and improvement recommendations, along with Corrective Action Plans have been issued to each of the 17 suppliers assessed. Our Category Managers will continue to work closely with suppliers to review implementation of the corrective actions.

14 per cent reduction in total spend classified as high-risk



Definitions and abbreviations

Carbon Capture and Storage (CCS)	A process in which greenhouse gases, including carbon dioxide, methane and nitrous oxide, from industrial and energy-related sources, are separated (captured), conditioned, compressed, transported and injected into a geological formation, that provides safe and permanent storage deep underground
CEO	Chief Executive Officer
clean fuels	Fuels which have the potential to materially reduce Scope 1, 2 and/or 3 greenhouse gas emissions. Clean hydrogen is an example of a clean fuel
cleaner energy / cleaner fuels	Energy sources that are used for power generation, transport, industrial processes or heating which have lower emissions of greenhouse gases or air pollutants (NO _x , SO _x and particulates) than other fuel sources. Natural gas is an example of a cleaner fuel and energy source, as it has lower greenhouse gas emissions than coal when used in power generation
Company	Santos Ltd and all its subsidiaries
Emissions	Greenhouse gas emissions, unless otherwise specified
Employees	Direct hire permanent and maximum term employees
GSI	Global Slavery Index
LNG	Liquefied natural gas. Natural gas that has been liquefied by refrigeration to store or transport it. Generally, LNG comprises mainly methane
Net Zero	In relation to greenhouse gas emissions, is achieved when anthropogenic emissions of greenhouse gases are balanced by anthropogenic removal of greenhouse gases through means such as operational activities or efficiencies, technology (e.g. CCS), offset through the use of carbon credit units, or other means
oil	A mixture of liquid hydrocarbons of different molecular weights
Oil Search	Oil Search Limited
Santos people/our people	Some or all of employees, officers and directors; contractors, agents, consultants and subcontractors; and apprentices, trainees, secondees, students gaining work experience, and volunteers
SAQ	Self assessment questionnaires
sustainable /sustainably	At Santos, sustainability is about striving to ensure safe operations, minimising environmental harm and greenhouse gas emissions, and creating long-term value for our stakeholders including our customers, community, employees, partners and shareholders; balancing the needs of today without undermining the ability to meet the demands of tomorrow
Tier 1 suppliers	Suppliers directly contracted by the company
Tier 2 suppliers	Suppliers sub-contracted by Tier 1 suppliers to the company
UNGPS	UN Guiding Principles on Business and Human Rights



Assurance report

Independent Limited Assurance Report to the Management and Directors of Santos Limited

Our Conclusion

Ernst & Young ('EY', 'we') was engaged by Santos Limited ('Santos') to undertake a limited assurance engagement as defined by Australian Auditing Standards, hereafter referred to as a 'review', over the Subject Matter defined below for the year ended 31 December 2022. Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe the Subject Matter has not been prepared, in all material respects, in accordance with the Criteria defined below.

What our review covered

EY was engaged to review Santos' Modern Slavery Statement ('Subject Matter', or 'Statement').

Criteria applied by Santos

In preparing the Subject Matter, Santos applied the following Criteria:

- ▶ *Modern Slavery Act (Commonwealth) 2018* ('the Act')
- ▶ *Commonwealth Modern Slavery Act 2018 'Guidance for Reporting Entities'* ('Guidance')

Key responsibilities

EY's responsibility and independence

Our responsibility is to express a conclusion on the Subject Matter based on our review.

We have complied with the independence and relevant ethical requirements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies Auditing Standard ASQM 1 Quality Management *for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Santos' responsibility

Santos' management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

Our approach to conducting the review

We conducted this review in accordance with the Australian Auditing and Assurance Standards Board's *Australian Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ASAE 3000') and the terms of reference for this engagement as agreed with Santos on 23 May 2023. That standard requires that we plan and perform our engagement to express a conclusion on whether anything has come to our attention that causes us to believe that the Subject Matter is not prepared, in all material respects, in accordance with the Criteria, and to issue a report.

Summary of review procedures performed

A review consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and other review procedures.



The nature, timing, and extent of the procedures selected depend on our judgement, including an assessment of the risk of material misstatement, whether due to fraud or error. The procedures we performed included, but were not limited to:

- ▶ Conducting interviews with personnel to understand the reporting process for complying with the Act and the additional disclosures on governance structure and internal activities as presented in the Statement
- ▶ Performing an assessment of the draft modern slavery statement against the Criteria
- ▶ Applying a suitable mixture of testing procedures to challenge alignment of the Modern Slavery Statement to the Act and reference to the Guidance for reporting entities.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our review conclusion.

Inherent limitations

Procedures performed in a review engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a review engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Other matters

We have not performed assurance procedures in respect of any information relating to prior reporting periods, including those presented in the Subject Matter. Our report does not extend to any disclosures or assertions made by Santos relating to future performance plans and/or strategies disclosed in the Subject Matter.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

Use of our Assurance Report

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than management and the Directors of Santos, or for any purpose other than that for which it was prepared.

The Ernst & Young logo is written in a cursive, handwritten style.

Ernst & Young
Adelaide, Australia

30 June 2023

A handwritten signature in black ink, appearing to read 'Fiona Hancock'.

Fiona Hancock
Partner

Modern Slavery ACT 2018 (Cth) - Statement Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of

Santos Limited

as defined by the Modern Slavery Act 2018 (Cth)¹ ("the Act") on

30 June 2023

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

Santos Limited Board of Directors




Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity	<u>ii, 4</u>
b) Describe the reporting entity's structure, operations and supply chains.	<u>3 - 8</u>
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<u>10 - 13</u>
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes,	<u>14 - 16</u>
e) Describe how the reporting entity assesses the effectiveness of these actions.	<u>17 - 18</u>
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	<u>ii</u>
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	<u>19 - 22</u>

Santos Limited

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STO

Santos website

To view our Annual Reports, shareholder and company information, news announcements and presentations, quarterly activities reports and historical information, please visit our website at Santos.com

Annual reports

You can view our Annual Report online at Santos.com

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