



Santos

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# Modern Slavery Statement

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Statement for 2021



## Acknowledgement

We acknowledge the Traditional Owners of the lands 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.

## About this Statement

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

In December 2021 Santos Limited merged with Oil Search Limited (Oil Search), a reporting entity under the Act. The modern slavery risk management initiatives of Oil Search are included in this Statement. Oil Search is no longer a separate reporting entity.

This Statement covers all entities within the Santos Limited Group and reports on the state of operations, structure, governance framework and activities during the reporting period 1 January to 31 December 2021. 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 procured by Santos on behalf of its joint ventures. The modern slavery risks and impacts associated with projects which Santos does not operate, such as Santos' joint venture operations in Papua New Guinea (PNG) are not included in this Statement.

Modern slavery risks and impacts have not been assessed in jurisdictions where Santos may still have a presence but does not actively operate, including Bangladesh, Vietnam and Singapore.

All dollar figures presented in this Statement are in AUD unless otherwise indicated.

## Disclaimer

This Statement contains forward-looking statements that are subject to risk factors associated with the oil and gas industry. 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, actual demand, currency fluctuations, geotechnical factors, drilling and production results, gas commercialisation, development progress, operating results, engineering estimates, reserves estimates, loss of market, industry competition, environmental risks, carbon emissions reduction and associated technology risks, 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 Statement 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. 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 Statement 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, express or implied, is given as to the accuracy, completeness or correctness, likelihood of achievement or reasonableness of any forward-looking information contained in this Statement. 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 Statement.

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## Statement from Chair and CEO

Santos is a global low-cost producer of oil and gas committed to cleaner energy and fuels production with operations across Australia, Papua New Guinea, Timor-Leste and North America.

Santos has been supplying reliable and affordable energy to Australia and the Asia-Pacific region for over 50 years. The successful merger with Oil Search Limited, which completed in December 2021, has transformed Santos into a company with the size and scale necessary to fund sustainable growth and to be a global leader in the transition to cleaner energy and clean fuels.

We are pleased to present our third Modern Slavery Statement that outlines the performance of our merged company during 2021.

Our Statement outlines our successful progress against our 12 month action plan and provides an update on our three year path. We are committed to continuous improvement in our modern slavery risk management initiatives as we continue to build a deeper understanding of our supply chain and mitigate human rights and modern slavery risk areas. We are particularly proud of the work we are doing with our suppliers to influence risk improvements.

Throughout our Statement we showcase case studies that demonstrate our ongoing commitment to sustainable development of resources and to improving the lives of people in the communities in which we operate.

This Statement was approved by the Board of Santos Limited in their capacity as principal governing body of Santos Limited on 23 June 2022.

Signed

**Keith Spence**  
Chair

**Kevin Gallagher**  
Managing Director and Chief Executive Officer

# Modern slavery roadmap

A summary of modern slavery risk management actions completed to 2021

## Santos

- + Engaged human rights & sustainability experts
- + Formed Modern Slavery Working Group
- + Developed modern slavery risk management framework
- + Conducted operational risk assessment
- + Reviewed and prioritised Tier 1 suppliers against modern slavery risk indicators
- + Engaged priority Tier 1 suppliers
- + Developed and delivered training to key personnel
- + Engaged Santos Board and Executive

### 2019

- + Reviewed and updated policies
- + Updated the Santos Code of Conduct and mandatory training
- + Completed screening of high-risk suppliers
- + Undertook deep dive assessment of priority suppliers
- + Started mapping and prioritising Tier 2 suppliers
- + Extended modern slavery risk management initiatives to newly acquired assets
- + Issued preliminary statement: 2019 Modern Slavery Statement

### 2020

- + Completed high-risk supplier deep dive surveys covering 75 per cent of high-risk spend
- + Extended shallow dive supplier assessments to capture all high-risk supplier >\$1m spend
- + Rolled out modern slavery e-learning course
- + Undertook supplier modern slavery risk analysis for Santos and Oil Search Tier 1 suppliers >\$1m spend
- + Enhanced awareness of and access to Santos Whistleblower Hotline
- + Issued 2020 Modern Slavery Statement

### 2021

## Oil Search

- + Convened Responsible Supply Chain Steering Group and Working Group
- + Participated in the Global Compact Network Australia (GCNA) Modern Slavery Community of Practice and IPIECA Social Responsibility Human Rights and Supply Chain Working Group
- + Completed modern slavery risk review
- + Prepared supplier data for mapping
- + Implemented new grievance system
- + Updated contract clauses
- + Continued engagement with and capacity building of local PNG Landowner Companies (Lancos) supplying to Oil Search
- + Issued preliminary statement: 2018 Modern Slavery Statement

- + Progressed Responsible Sourcing Principles and Standard
- + Developed Human Rights Policy
- + Reviewed and updated supplier onboarding processes
- + Developed responsible sourcing risk tool
- + Conducted supplier audits
- + Delivered mandatory Code of Conduct training
- + Continued to support and train local PNG suppliers
- + Continued participation in GCNA and IPIECA
- + Issued preliminary statement: 2019 Modern Slavery Statement

- + Released Responsible Sourcing Principles
- + Released Human Rights Policy
- + Piloted responsible sourcing risk tool
- + Improved supplier engagement standards and management processes, including supplier pre-qualification, supplier due diligence and supplier set-up
- + Executed Lanco Reset Strategy to further support local PNG Landowner Companies
- + Undertook consultation and engagement with JVs and non-operated group entities (Biomass, Nu Power, Oil Search Foundation)
- + Conducted training and awareness sessions
- + Continued participation in GCNA and IPIECA
- + Issued 2020 Modern Slavery Statement

# Combining our strengths to tackle modern slavery

In December 2021, Oil Search Limited and Santos Limited merged, bringing together a team of professionals committed to managing modern slavery and human rights risks across joint operations and supply chains including in Australia, Timor-Leste, Papua New Guinea and North America. A working group of procurement, risk, legal, sustainability, communications and operational personnel from both entities was brought together to review modern slavery risk management initiatives implemented in each organisation and to develop a road map of actions for the next three years.

Santos intends to undertake the following actions in the future:

## 2022

- + Review of Oil Search Responsible Sourcing Principles for use in merged company group
- + Integrate policies, standards, procedures across merged company group
- + Complete training roll out for merged group
- + Refresh supply chain risk mapping
- + Undertake additional supplier deep dive reviews
- + Refresh due diligence with joint venture partners
- + Undertake Modern slavery risk management program review and assess effectiveness of actions
- + Include modern slavery criteria in risk analytics software
- + Further develop Santos' broader human rights framework
- + Continue to be an active member of industry networks and working groups
- + Develop and release a Human Rights & Modern Slavery Policy

## 2023

- + Update supplier communications plan for merged company group
- + Engage and educate identified Tier 2 suppliers
- + Roll out supplier SAQs to highest priority Tier 2 suppliers
- + Seek to identify Tier 3 suppliers for priority procurement categories
- + Mature processes for managing modern slavery specific investigations and remediation
- + Support strategic/high-risk suppliers with additional capacity development
- + Cascade our whistleblower hotline to high-risk supplier locations
- + Implement human rights impact assessments for all international projects
- + Build on qualitative and quantitative effectiveness indicators and adjust program accordingly
- + Consider outcomes of Modern Slavery Act review process
- + Review current practices for emerging decommissioning scope

## 2024

- + Align modern slavery risk management program to any new or updated legislative reporting requirements
- + Roll out refresher training to key internal staff to reflect legislative and other changes
- + Engage additional high priority Tier 2 suppliers
- + Undertake strategic effectiveness review of Santos' modern slavery risk management program
- + Review and update Category Risk Taxonomy and supplier risk ratings
- + Extend supply chain risk mapping to highest priority procurement categories
- + Conduct ongoing audits where required for for priority Tier 1 and Tier 2 suppliers



## About us

Santos is a global low-cost producer of oil and gas committed to cleaner energy and fuels production with operations across Australia, Papua New Guinea, Timor-Leste and North America.

Santos has been supplying reliable and affordable energy to Australia and the Asia-Pacific for over 50 years.

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 emissions in an affordable and sustainable way.

Santos is one of Australia's biggest domestic gas suppliers, a leading Asia-Pacific LNG supplier and is committed to supplying the critical fuels such as oil and gas in a more sustainable way through decarbonising projects such as the Moomba CCS project.

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.

For more than 65 years, Santos has been working in partnership with local communities, providing local jobs and business opportunities, safely and sustainably developing its natural gas resources, and powering industries and households.

As customer demand evolves, Santos plans to grow its cleaner energy and clean fuels through carbon capture and storage, nature-based offsets, energy efficiency and use of renewables in its operations.

With a strong, low-cost base business supplying oil and gas and plans to develop cleaner energy and clean fuels, Santos remains resilient, value accretive and at the leading edge of the energy transition.

## The Santos Values

Santos' Values inform the behaviours, leadership attributes and decision-making of all Santos employees. They reflect how Santos employees work, treat each other, and interact with the people and communities around Santos.

The Santos Values are brought to life by the LEAP (Leaders, Experts and Professionals) behavioural framework which provides tangible examples of expected workplace behaviours and standards by career level. Our Code of Conduct (which was updated in early 2022 to reflect our expanded operations) is based on the principles that guide the way we work, as set out in our Values. It is a key element of the Santos Management System - a framework of policies, standards and procedures that set out mandatory performance requirements. The Code of Conduct is regularly reviewed. Material breaches of the Code of Conduct are reported to the Board Audit and Risk Committee.

Any person who performs work for or on behalf of Santos must comply with our Code of Conduct, which contains the following core requirements:

- + We work safely and look out for the safety of our colleagues.
- + Our workplace is free from harassment, discrimination and bullying.
- + We act ethically and lawfully in all business conduct, including working in a way that respects the human rights of all people touched by our operations.
- + We understand and manage the impact of our operations on the environment and engage with our stakeholders with respect.
- + We communicate accurately and honestly with investors, government and the community.
- + All trading in Santos securities occurs in compliance with the Securities Dealing Policy.
- + Everyone at Santos is expected to understand and comply with the standards in the Code of Conduct.
- + All breaches of the Code of Conduct must be reported.
- + The Board, including through its various Committees, is responsible for setting, assessing and reinforcing the Santos culture.

These Values and requirements form the foundation of Santos' corporate governance framework.



**Work as one team**



**Always safe**



**Act with integrity**



**Be accountable**



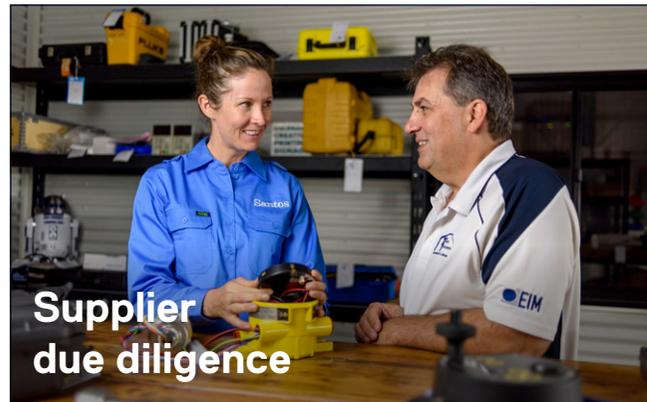
**Pursue exceptional results**



**Build a better future**

## 2021 modern slavery risk management initiatives

We made significant progress in 2021 to integrate modern slavery risk management initiatives into company policies, code of conduct, procedures, and supplier risk management processes. A snapshot of our actions is included below:



### Supplier due diligence

Refreshed our supplier risk analysis and updated our risk dashboard to better understand changes in our year-on-year supplier risk profile. Adapted our modern slavery risk management strategy and action plan accordingly.

Ensured previously acquired assets are operating under the Santos Management System.

Completed deep dive assessments and issued corrective action plans to an additional 9 potentially high-risk suppliers, resulting in 75 per cent of high-risk suppliers (with spend above \$1 million) having been assessed in detail.

Extended shallow dive assessment to additional 24 suppliers to capture 100 per cent of high-risk suppliers (above \$1 million spend).

Updated supplier risk heat map to reflect expanded spend base (including assets as a result of the merger with Oil Search).

Working with our Tier 1 suppliers, we identified an additional 47 Tier 2 suppliers, 75 per cent of who were ranked as potentially high-risk, 21 per cent as medium risk and 4 per cent as lower risk.



### Governance

Our Board Audit and Risk Committee reviewed enterprise-wide risks, new or emerging risks, and the risk controls and mitigations that management has put in place in relation to those risks.

Enhanced visibility of Santos' Whistleblower Hotline.

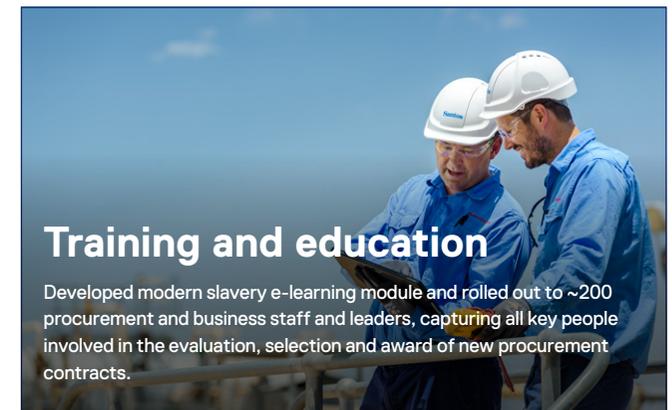


### Procurement processes

Further enhancement of the Santos Procurement processes and documentation to ensure human rights and modern slavery issues are properly considered in the evaluation, selection and award of new contracts.

Continued to implement modern slavery contract clauses and worked with suppliers to verify compliance.

Engaged and mentored internal Category Managers to support suppliers implement priority corrective action requests.



### Training and education

Developed modern slavery e-learning module and rolled out to ~200 procurement and business staff and leaders, capturing all key people involved in the evaluation, selection and award of new procurement contracts.



**More detail on each of these actions is included under Criteria 4 of this Statement.**

## Our plans for 2022

**Responsible Sourcing Principles:** The Oil Search Responsible Sourcing Principles will be reviewed for potential use by the merged company group.

**Policy alignment:** Integrate policies, standards and procedures across merged company group.

**New policy introduction:** Develop and implement a Human Rights & Modern Slavery Policy.

**Capability building:** We will continue to deliver modern slavery risk management training to staff, focusing initially on including all key merged group roles.

**Supply chain risk mapping:** We will undertake supply chain risk mapping across the merged group spend and prioritise suppliers and supply categories against spend and modern slavery risk indicators.

**Ongoing due diligence:** We will continue to roll out supplier surveys and desk-top supplier assessments for our highest risk/highest spend Tier 1 suppliers (direct contract) including those in our recently acquired PNG and North American asset; assess known Tier 2 suppliers (subcontracted suppliers) against modern slavery risk indicators; and work with joint venture partners to review risks in international operations.

**Joint venture partner engagement and collaboration:** We will explore opportunities to deepen our engagement with joint venture partners and non-controlled entities.

**Supplier monitoring:** We will establish and implement specific supplier monitoring programs for our highest risk suppliers and include modern slavery criteria in risk analytics software.

**Effectiveness review:** We will review the effectiveness of actions taken to identify, assess and address modern slavery risks and incorporate outcomes-focused performance indicators into review processes.

**Human rights due diligence:** We will progress towards integrating Santos' broader human rights commitments and framework into supplier due diligence processes.

**Industry collaboration:** We are a member of the UN Global Compact Network Australia (GCNA) Modern Slavery Community of Practice and the Ipieca Social Responsibility, Human Rights and Supply Chain Working Group. These forums provide us with insight into the human rights, modern slavery and supply chain challenges faced by our peers and others and enable us to contribute to the development of tools and industry guidance. We will also investigate options for joining other industry bodies and relevant collaborative groups.

**Supporting local suppliers:** We will continue to support local suppliers in Alaska Native Corporations, PNG Landowner Companies, or Lancos. These companies provide many core services to our operations in these jurisdictions, including drilling support, security, camp management, catering, general maintenance, and transportation.



## Our plans for 2023

**Supplier engagement:** We will expand our supplier engagement and communications strategy and conduct engagement and awareness-raising initiatives with high-risk Tier 1 suppliers on an ongoing basis.

**Incident response and remedy framework:** We will mature our processes for managing investigations and develop and implement a remedy pathway linked to our incident response plan and aligned to the UN Guiding Principles on Business and Human Rights (UNGPs).

**Supplier capacity building:** We will support our identified strategic and highest risk suppliers with additional capacity development to enable effective management and mitigation of modern slavery risks.

**Expand whistleblower hotline:** We will seek to consult with key stakeholders on the effectiveness of our whistleblower hotline.

**Continuous improvement:** We will continue to review and improve our due diligence, risk management, training and supplier engagement systems and processes to ensure modern slavery risks are effectively managed and mitigated.

**Assessing modern slavery risks when decommissioning:** We will review current practices for emerging decommissioning works and ensure modern slavery and human rights risks are assessed, addressed and mitigated as part of future decommissioning works.

## Our plans beyond 2023

**Category risk taxonomy:** We will review and update our category risk taxonomy and risk ratings.

**Supply chain risk mapping:** We will extend our supply chain risk mapping for our highest risk products (beyond Tier 1 and Tier 2 suppliers).

**Supplier audits:** We will undertake further supplier audits where required of our highest risk Tier 1 and Tier 2 suppliers.

**Effectiveness review:** We will undertake strategic effectiveness review of Santos' modern slavery risk management program.

**Risk analysis:** We will undertake local and global industry sector and legislative framework analysis.

**Human rights impact assessment:** We will undertake broad human rights impact assessments for all international projects.

# Reporting Criteria 1 & 2

# About Santos

Our organisational structure

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Our operations

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Our supply chain

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# Our organisational structure

**Santos Limited (Santos)** is an Australian public company, ACN 007 550 923. The registered office for Santos is 60 Flinders Street, Adelaide, SA 5000. As at 31 December 2021, Santos had 3,786 employees.

Santos' principal activities during 2021 were the exploration for, and development, production, transportation and marketing of, hydrocarbons, and the development of technologies such as carbon capture and storage. Revenue is derived primarily from the sale of gas and liquid hydrocarbons.

Following the December 2021 merger with Oil Search Limited (Oil Search), Santos now has operations in PNG and North America. As a result of the merger, Santos' shares are now listed on both the ASX and PNGX. We continue to participate in joint ventures across our portfolio as an operator and/or participant.

**Controlled entities:** A list of our entities is provided in our 2021 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, and all share the same executive management. The directors for the majority of the subsidiaries are the Chief Executive Officer and Chief Financial Officer of Santos Limited. In 2022 our focus will be on working closely with our PNG subsidiaries to ensure our modern slavery and human rights risks continue to be effectively assessed, addressed and mitigated.

## Our governance framework

Effective corporate governance is critical to the long-term success of Santos. The Board and all levels of management are committed to maintaining and enhancing a strong corporate governance framework that underpins our vision to be Australia's leading natural gas company by 2025.

We have undertaken a comprehensive review of our governance arrangements and adopted a number of enhancements, including renewal of the Santos Board with the addition of two board members in 2021 (who previously served on the Oil Search Limited Board). We will continue to review and implement appropriate changes to our governance arrangements given the change in size and scale of our company.

The Board of Santos has ultimate responsibility for the approval and oversight of our modern slavery risk management framework and this Statement. The Board has a process to ensure members are kept informed on modern slavery issues via input from the senior leadership team as well as independent advice when considered appropriate. The Environmental, Health, Safety and Sustainability Committee (EHSS Committee) supports the Board in overseeing Santos' modern slavery risk management program and performance.

The purpose of our corporate governance framework is to assist our people to make good decisions that promote the longer-term success of Santos. Our corporate governance framework and its link to the Company's Values and culture is illustrated to the right.

### The Board

Is responsible for overseeing the performance and operations of the Company

The Board approves Santos' Values and is responsible for monitoring Santos' culture and compliance with Santos' Code of Conduct and ethical standards.

### Board committees

<b>Audit &amp; Risk</b>	Including risk management and financial reporting
<b>People, Remuneration &amp; Culture</b>	Including Senior Executive pay and human resourcing issues across the business
<b>Environment, Health, Safety &amp; Sustainability</b>	Including climate change, anti-slavery, land access, Indigenous engagement, cultural heritage and community engagement
<b>Nomination</b>	Including new Board appointments and succession

The EHSS Committee supports the Board in overseeing Santos' modern slavery risk management program and performance.

All Board Committees have procedures and practices in place to ensure that they effectively communicate with each other in relation to matters of shared responsibility



### Management under the leadership of the CEO

Is responsible for delivering the strategic direction and goals approved by the Board

The CEO is responsible for instilling a culture that aligns with Santos' Values.

## 2021 governance highlights

Our 2021 governance highlights include:

- + Appointment of two new Directors formerly on the Board of Oil Search Limited
- + Board site visit to GLNG Curtis Island and LNG facility
- + Commissioned an Independent review of the Company's Risk Management Framework
- + Ongoing review and refresh of the Risk Appetite
- + Conduct of an external Board performance review
- + Review and update of publicly available core corporate governance policies including Climate Change, Market Communications and Continuous Disclosure and Risk Management Policies
- + Commitment to a Say on Climate vote at the 2022 AGM
- + Review and update of Board and Committee Charters in line with current best practice
- + Publication of second Modern Slavery Statement

Anti-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, Climate Change, Anti-Slavery, Land Access, Indigenous Engagement and Cultural Heritage and Community Engagement.

In relation to modern slavery risk management 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.

We support the intent and purpose of the ASX Corporate Governance Council's Principles and Recommendations (ASX Principles). Our 2021 Corporate Governance Statement reports against the 4th Edition of the ASX Principles.

## Corporate memberships

In the conduct of Santos' activities, the company is a member of a large number of organisations, ranging from community bodies, chambers, business councils relevant to the communities and regions we operate in and industry-related representative bodies, known as 'industry associations'. Santos' membership of these organisations is as a means to gain an understanding of communities, regions and economies and how the company can contribute positively and effectively to them, as well as to enhance technical knowledge, share learnings, develop standards, and influence policy development. They serve as a forum to debate, align, and promote key interests of communities and organisations.

Santos continually reviews all of our memberships and the alignment of industry associations with the company's policy positions and uses its memberships to drive the evolution of representative industry positions and policies. In 2020 and 2021 Santos conducted specific reviews in relation to the alignment of the policy positions of industry associations of which Santos is a member, to our company's own energy and climate-related policy positions and to the goals of the Paris Agreement. Statements on the reviews conducted in 2020 and 2021 are published on the company's website.

## Santos Management System

The Santos Management System applies to all employees and contractors and establishes the requirements for how we do business across our assets and functional support teams, including how we manage modern slavery and other human rights risks. It is designed to protect our people, communities where we operate, and the environmental values associated with our portfolio of assets, operations and activities.

The Santos Management System comprises:

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

A number of the policies and procedures are publicly available on the santos.com website:

- + Code of Conduct
- + Anti-Corruption and Sanctions Compliance Procedure
- + Human Rights and Modern Slavery Policy
- + Environment, Health and Safety Policy
- + Reporting Misconduct (Whistleblower) Procedure
- + Climate Change Policy
- + Diversity and Inclusion Policy
- + Local and Indigenous Communities Policy
- + Market Communication and Continuous Disclosure Policy
- + Risk Management Policy
- + Securities Dealing Policy

Our employees and contractors are required to report suspected or actual violation of the Code of Conduct, in line with our Reporting Misconduct (Whistleblower) Procedure and other procedures specific to the jurisdictions in which we operate. This means directly to General Counsel, Company Secretary, executive manager of People and Culture or manager of Risk & Audit or via our external, confidential 24-hour Reporting Misconduct Hotline. Allegations of misconduct are assessed by the General Counsel and executive manager of People and Culture to provide recommendations for investigation to the Managing Director and CEO.

In 2021, there were a total of seven new investigations conducted, of which two allegations were substantiated. The outcomes of investigations are reported to the Board's Audit and Risk Committee. Where allegations are substantiated, disciplinary action may range from counselling to termination of employment. Santos is committed to ongoing, transparent reporting of business performance outcomes and data, coupled with future strategies for sustainable operation and the continuous improvement of our public disclosures.

[Our Organisational structure](#) | [Our Operations](#) | [Our supply chain](#)

## Our people

As at 31 December 2021, Santos had 3,786 employees across our operations.

Our 2021 Graduate, Apprenticeship and Traineeship programs in Australia and PNG attracted exceptional talent. Not only does the Graduate Program attract the brightest young minds, it provides exceptional opportunities for accelerated career development across disciplines spanning engineering, the geosciences, environmental science, law, accountancy, and economics.

The program incorporates on-the-job technical training and specialist development activities, with graduate employees rotating through various teams gaining office and field experience across the country from our modern capital city offices to the central Australian outback, to rigs in offshore Western Australia. They are offered exposure to innovative projects like solar energy conversion, advanced analytics, and drone mapping.

Over 320 employees have come through the Santos Graduate Program since 1998. In the last 5 years the overall retention of employees completing the program has remained between 88 per cent to 100 per cent. After completing the graduate program our graduates continue to demonstrate high performance with several graduates progressing into leadership roles across the company. 84 graduates and interns employed at the end of 2021, with female intake at 39 per cent.

Since 2011 we have created over 800 employment and training opportunities for indigenous Australians and in 2021 over 300 people were employed in communities where we operate.

We have a dedicated Indigenous Participation Framework in place that covers the breadth of our assets and activities. It builds out our strategic vision and clearly defines how we will deliver on land access, economic participation and community investment activities, to significantly build Indigenous participation capability.

The framework enables a consolidated, cross-functional, sustainable approach for Indigenous participation activities within Santos, and is guided by the Local and Indigenous Communities Policy.

## Risk and materiality

Included within the Santos Management System is a Risk Management Framework. It outlines the governance approach, processes, procedures, and tools we use to understand and assess sustainability risks, as they apply to our planned projects, operations, and activities. Also included is an Enterprise Risk Management process that captures the highest-level risks that the business needs to manage, including those related to sustainability. The Santos Management System defines risk categories including those that must be reported to the Board's Audit and Risk Committee. The Enterprise Risk Management process is an active process. It enables the Board and leadership team to confirm that company-wide risks are being managed effectively and that business objectives are achieved in a safe and sustainable manner.

Understanding material issues both from a business and stakeholder perspective helps us to determine what issues are most important for our stakeholders and facilitates targeted reporting on issues that are important to our business and its stakeholders.

## Stakeholder Engagement

Understanding material issues helps us to determine which issues are most important to our stakeholders and facilitates targeted reporting on issues that are important to our business.

Santos undertakes assessment in accordance with Global Reporting Initiative (GRI) recommendations, the most recent being undertaken in 2021. The purpose of the materiality assessment is to provide strategic insight into the identification and evaluation of the priority topics that underpin the integration of sustainability into the corporate strategy. The assessment is a consultative process, canvassing internal and external stakeholders via a workshop and survey that considered an array of potentially material topics. Oil Search also conducted a materiality assessment in 2021, with a similar GRI aligned methodology. The results of the separate materiality assessments were well aligned and were integrated into a merged entity assessment.

“ Santos is committed to creating a positive legacy in the communities where we operate. We partner with community to identify and progress opportunities designed to build community resilience and bolster long-term economic sustainability.

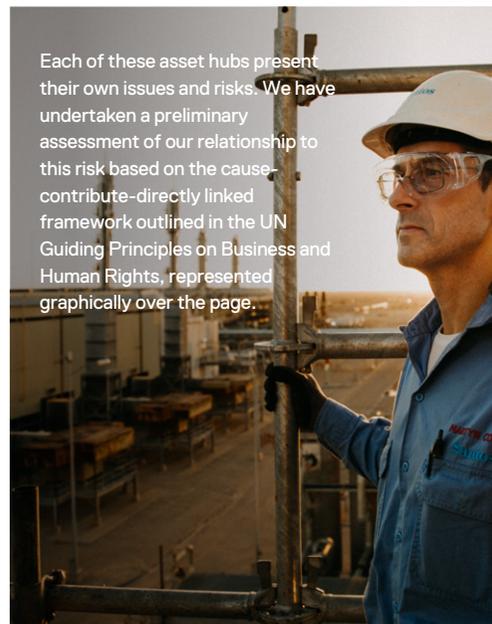
Our Indigenous Participation Framework is guided by the Local and Indigenous Communities Policy.



# Our operations

For over 65 years we have been safely and sustainably exploring and developing oil and natural gas resources in partnership with local communities, landholders and marine users. We comply with all labour, employment, immigration and whistleblower laws of the jurisdictions in which we operate, and are committed to:

- + working safely and looking out for the safety of our colleagues;
- + providing a workplace free from harassment, discrimination and bullying;
- + acting ethically and lawfully in all business conduct;
- + engaging with our stakeholders respectfully and honestly; and
- + building sustainable communities through providing local jobs, developing local skills and providing local business opportunities.



Each of these asset hubs 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 UN Guiding Principles on Business and Human Rights, represented graphically over the page.

Santos has controls in place to ensure we provide a safe, diverse and inclusive workplace for our employees. Vulnerability to exploitation and modern slavery of our own people is low as most are highly educated professionals.

Our operations focus on exploration, development, production, transportation and marketing of natural gas and other petroleum products both onshore and offshore in Australia and PNG. These products are sold to customers in Australia and Asia.

Five core long-life natural gas assets now sit at the heart of our business: Western Australia, the Cooper Basin, Queensland and NSW, Northern Australia & Timor-Leste, and Papua New Guinea. We also have growth opportunities in North America.

Our 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 any potential modern slavery risks on an ongoing basis. We have an internal audit program to ensure the effectiveness of our risk control framework and compliance with our policies.

While we consider the potential for us to cause or contribute to modern slavery to be relatively low in our Australian operations, areas of vulnerability in these operations include outsourced services such as cleaning, catering, security and facilities management, and use of labour hire contractors. We acknowledge that the risk of causing or contributing to modern slavery in our international operations is higher than in our Australian operations and will continue to build on our operational due diligence processes in 2022. We will 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.

# Our core assets and sustaining natural gas and associated liquids development



## Cooper Basin

Australia's largest onshore oil and gas field development with gas and liquids processed at the Moomba plant.



## Northern Australia and Timor-Leste

Large discovered resource base well-positioned to backfill and support the expansion of Darwin LNG and the production of clean fuels.



## Queensland and New South Wales

In Queensland, GLNG feed gas is sourced from the Surat and Bowen Basins, Santos portfolio gas and third-party supply. In NSW regulatory approvals are being sought to develop the Narrabri project.



## Western Australia

Santos is Western Australia's largest domestic gas producer, producing gas, condensate and oil from shallow-water offshore fields. Portfolio of near-field development and exploration assets.



## Papua New Guinea

Santos has been active in Papua New Guinea since the 1980's, with interests in PNG LNG, Papua LNG and PNG's producing oil fields.



## Growth Opportunity - North America

World-class, low-carbon oil discovery located in the prolific Alaska North Slope region.

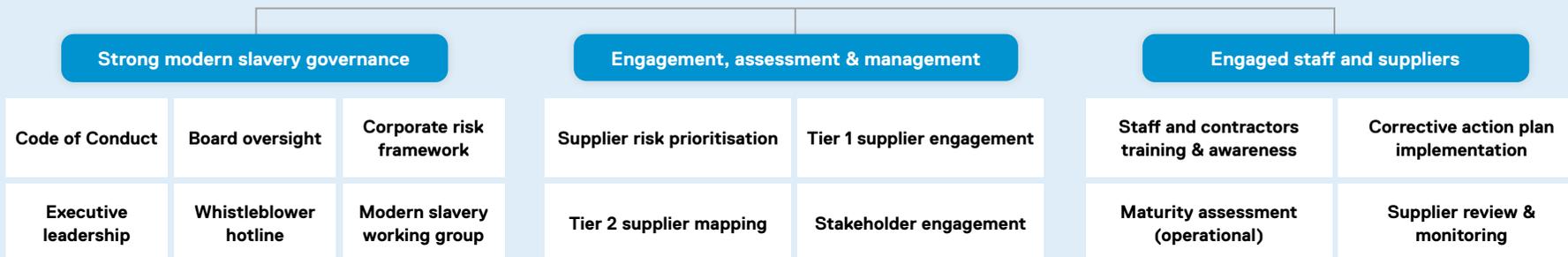
### Santos Operating Model and Relationship to Potential Modern Slavery Risks

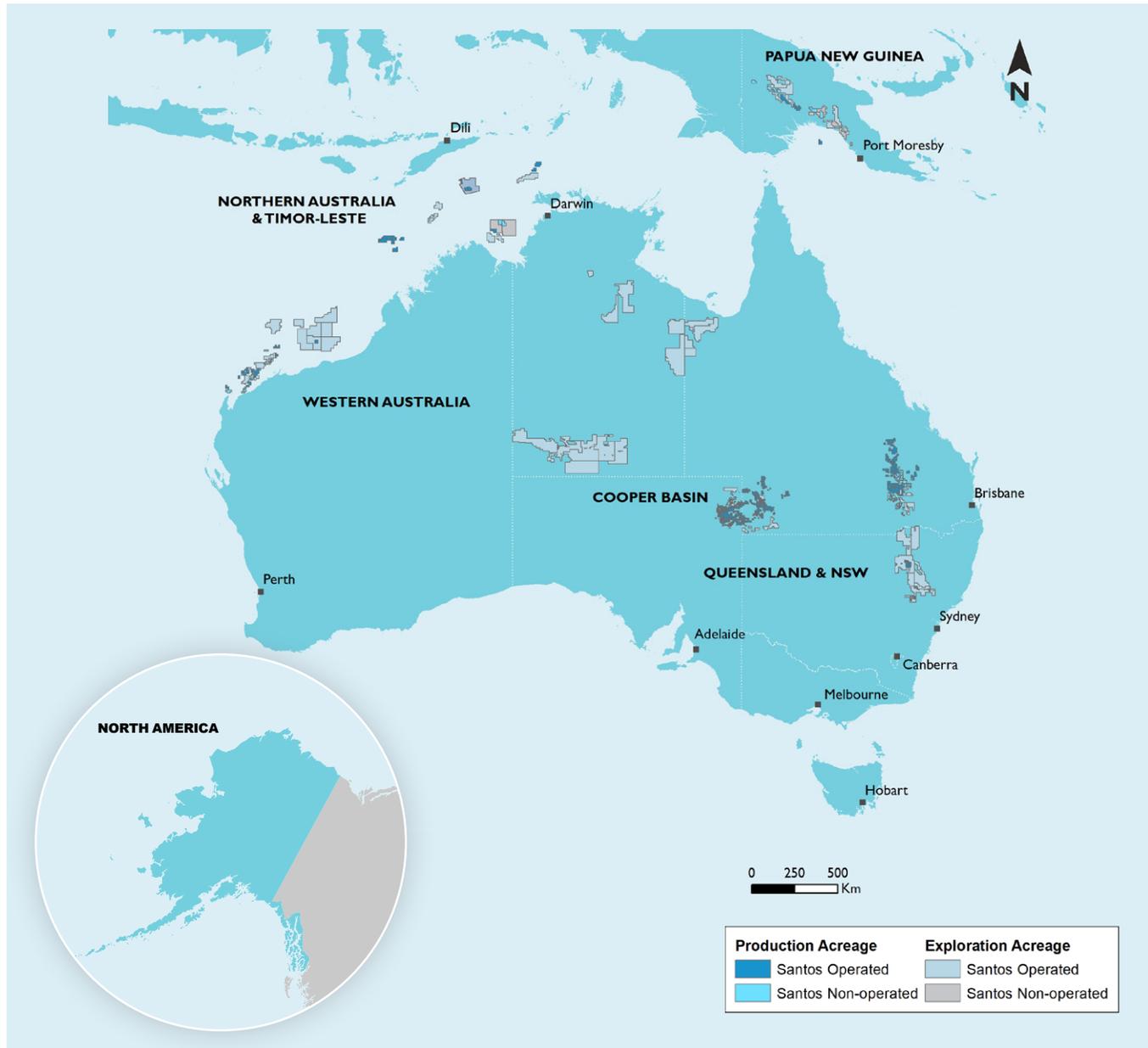


### OUR RELATIONSHIP TO POTENTIAL MODERN SLAVERY RISKS

Cause	Contribute	Directly linked
<ul style="list-style-type: none"> <li>+ Australian operations – labour rights risks (unlikely)</li> <li>+ PNG - potential risks include domestic servitude and labour rights risks in subsidiary entities</li> <li>+ North America - labour rights risks in subsidiary entities</li> </ul>	<ul style="list-style-type: none"> <li>+ Outsourced services</li> <li>+ Labour Hire companies</li> <li>+ Competitive cost targets</li> <li>+ JV partners</li> <li>+ Sponsorship &amp; donations</li> </ul>	<ul style="list-style-type: none"> <li>+ Opaque supply chains beyond direct suppliers</li> <li>+ Extended Business Relationships</li> </ul>

### HOW WE MANAGE MODERN SLAVERY RISK AND DEMONSTRATE DUE DILIGENCE





## Where we operate

### Western Australia

Santos is the largest producer of domestic natural gas in Western Australia and is also a significant producer of oil and natural gas liquids. Santos' assets include 100 per cent ownership and operatorship of the Varanus Island and Devil Creek domestic gas hubs, a 28.6 per cent interest in the Macedon gas hub and a leading position in the highly prospective Bedout Basin.

A front end engineering and design (FEED)-entry decision for the initial phase of the proposed Dorado integrated oil and gas project (Santos 80 per cent interest) was taken in June 2021.

Potential modern slavery risk areas for the Western Australian business include spend in the marine category, fabrication of assets in Asia and also potential emergent risks from future decommissioning of aged assets.

### Cooper Basin

The Cooper Basin produces natural gas, gas liquids and crude oil. Gas is sold primarily to domestic retailers, industry and for the production of liquefied natural gas (LNG), while gas liquids and crude oil are sold in domestic and export markets.

Santos' strategy in the Cooper Basin is to deliver value by being a low-cost business, increasing reserves, investing in new technology to lower development and exploration costs, reducing emissions and increasing utilisation of infrastructure including the Moomba and Port Bonython plants (Santos 66.7 per cent interest).

Santos is also focused on reducing emissions by investing in Carbon Capture and Storage (CCS). The 1.7 million tonne per annum Moomba CCS project took a final investment decision in November 2021 with first injection expected in 2024.

Potential modern slavery risk areas for the Cooper Basin business include spend in the logistics area and construction.

Our Organisational structure | [Our Operations](#) | Our supply chain

## Queensland and NSW

The GLNG project in Queensland produces LNG for export to global markets from the LNG plant at Gladstone. Gas is also sold into the domestic market. Santos has a 30 per cent interest in GLNG.

The LNG plant has two LNG trains with a combined capacity of 8.6 mtpa. Production from Train 1 commenced in September 2015 and Train 2 in May 2016. Feed gas is sourced from GLNG's upstream fields, Santos portfolio gas and third parties.

Santos aims to build GLNG gas supply through upstream development, seek opportunities to extract value from existing infrastructure and drive efficiencies to operate at lowest cost. Santos is also progressing the proposed Narrabri domestic gas project in NSW. The project received environmental approvals from the state and federal governments in 2020, and Santos plans to commence an appraisal program in 2022.

Potential modern slavery risk areas for the Queensland and NSW business include spend in the logistics area and construction categories.

## Northern Australia and Timor-Leste

Santos' business in northern Australia and Timor-Leste is focused on the Bayu-Undan/Darwin LNG (DLNG) project (Santos 43.4 per cent interest). In operation since 2006, DLNG produces LNG and gas liquids for export to global markets.

The Bayu-Undan field in Timor-Leste, which supplies all the gas to DLNG, is currently expected to reach end of field life in 2022. Santos is assessing the potential of repurposing Bayu-Undan into a carbon capture and storage hub after production ceases.

In March 2021, Santos announced the final investment decision to proceed with the Barossa gas and condensate project to backfill DLNG. The project was 20 per cent complete at the end of 2021 with first gas production expected in the first half of 2025. Santos currently has a 50 per cent interest in the Barossa project.

Potential modern slavery risk areas for the Northern Australia & Timor-Leste business include spend in the marine area, fabrication of assets in Asia (e.g. our Barossa Project) and also potential emergent risks from future decommissioning of aged assets.

## North America

Our assets in Alaska include the Pikka Unit located on the North Slope, a world-class oil province with more than 50 years of oil and gas development and extensive existing infrastructure. Located within the Pikka Unit, the Pikka Phase 1 project (Santos 51 per cent interest) is targeting a gross production rate of approximately 80,000 barrels of oil per day with top quartile performance for emissions intensity. FEED and assurance activities were nearing completion at the end of 2021, and all major regulatory and environment approvals have been received.

Potential modern slavery risks for the Alaskan business are currently relatively low reflecting the limited spend in Alaska for the Pikka project which is currently in the engineering/FEED phase.

## Papua New Guinea

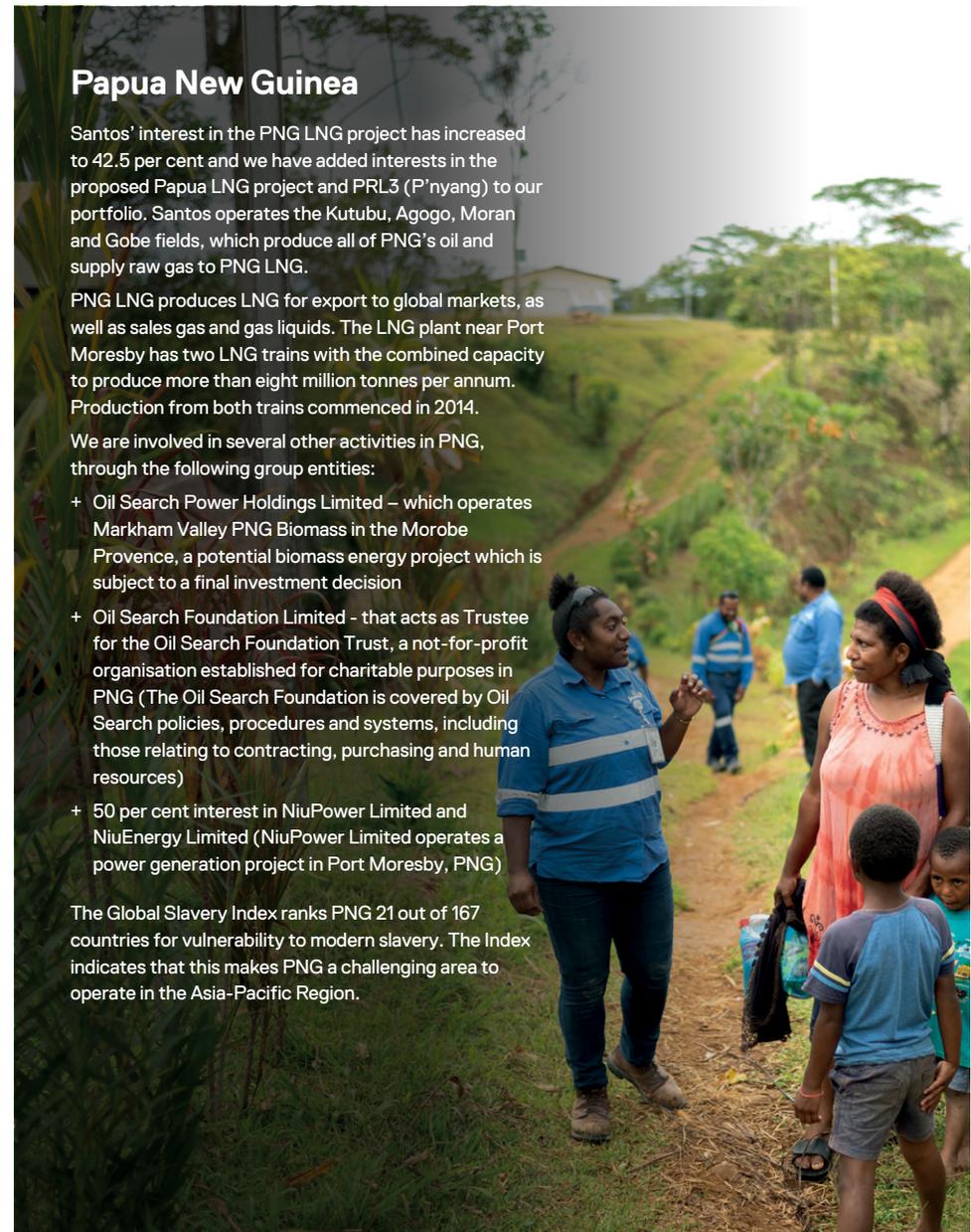
Santos' interest in the PNG LNG project has increased to 42.5 per cent and we have added interests in the proposed Papua LNG project and PRL3 (P'nyang) to our portfolio. Santos operates the Kutubu, Agogo, Moran and Gobe fields, which produce all of PNG's oil and supply raw gas to PNG LNG.

PNG LNG produces LNG for export to global markets, as well as sales gas and gas liquids. The LNG plant near Port Moresby has two LNG trains with the combined capacity to produce more than eight million tonnes per annum. Production from both trains commenced in 2014.

We are involved in several other activities in PNG, through the following group entities:

- + Oil Search Power Holdings Limited – which operates Markham Valley PNG Biomass in the Morobe Province, a potential biomass energy project which is subject to a final investment decision
- + Oil Search Foundation Limited - that acts as Trustee for the Oil Search Foundation Trust, a not-for-profit organisation established for charitable purposes in PNG (The Oil Search Foundation is covered by Oil Search policies, procedures and systems, including those relating to contracting, purchasing and human resources)
- + 50 per cent interest in NiuPower Limited and NiuEnergy Limited (NiuPower Limited operates a power generation project in Port Moresby, PNG)

The Global Slavery Index ranks PNG 21 out of 167 countries for vulnerability to modern slavery. The Index indicates that this makes PNG a challenging area to operate in the Asia-Pacific Region.



## Case study 1

## Managing human rights risks in PNG

Human rights risks include the use of force by public and private security forces, interference with Indigenous community land access or cultural heritage and the labour practices of suppliers and contractors. These are particularly relevant where operations, or the operations of business partners, occur in high-risk jurisdictions, including PNG.

The occurrence of any of these risks may result in significant impact on affected individuals and communities, as well as the loss of our social licence to operate, litigation or reputational damage. Oil Search's practice prior to integration has been to incorporate human rights risks into a company-wide risk management framework and for risks to be regularly assessed and updated.

Training and awareness covering key human rights topics such as responsible security and modern slavery was conducted for employees in key functions including Security and Contracts and Procurement. The Company's grievance mechanisms, including the Reporting Misconduct (Whistleblower) Procedure and procedures relevant to the jurisdiction are governed at the highest level by the Board Audit and Risk Committee.

Santos is committed to respecting human rights and is currently reviewing the human rights-related controls described above as part of the integration process to establish a consolidated approach to managing its human rights risks.



## Our supply chain

Our supply chain consists primarily of large oil and gas field engineering, construction and technical services companies, 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 2021, Santos spent A\$4.01 billion with over 3,600 suppliers. We spent A\$3.5 billion with 364 Tier 1 (direct hire) suppliers with annual spend above A\$1 million. This is an increase of A\$680 million from total spend reported in our 2020 Modern Slavery Statement.



## Our annual procurement spend

88 per cent of Santos' annual procurement spend in 2021 (not including Oil Search spend) was with Australian based suppliers. We contributed approximately A\$3.5 billion to the Australian economy through our procurement spend, an increase of A\$680 million from our 2020 statement.

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.

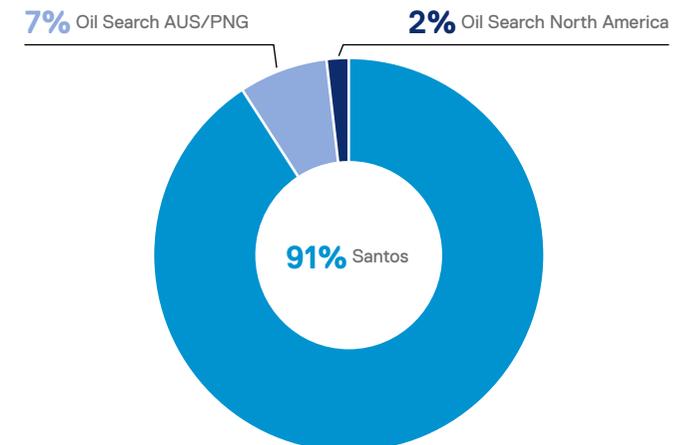
In addition to our Australian based suppliers, 12 per cent of Santos' total spend is with overseas suppliers operating in 33 countries. Over two thirds of spend with overseas suppliers is with suppliers based in Singapore and 95 per cent of our overseas suppliers with whom we spend more than A\$1 million annually are located in just seven countries.

Following the merger with Oil Search in December 2021, we undertook a detailed modern slavery risk assessment of our expanded supply chain (see Case Study 2). A detailed risk assessment and supplier prioritisation process of a single integrated supply chain (including Oil Search suppliers) will be undertaken in the 2022 reporting period. Our merged Oil Search entities operate largely in Papua New Guinea and North America where 43 and 91 per cent of their goods and services respectively are sourced from in-country suppliers.

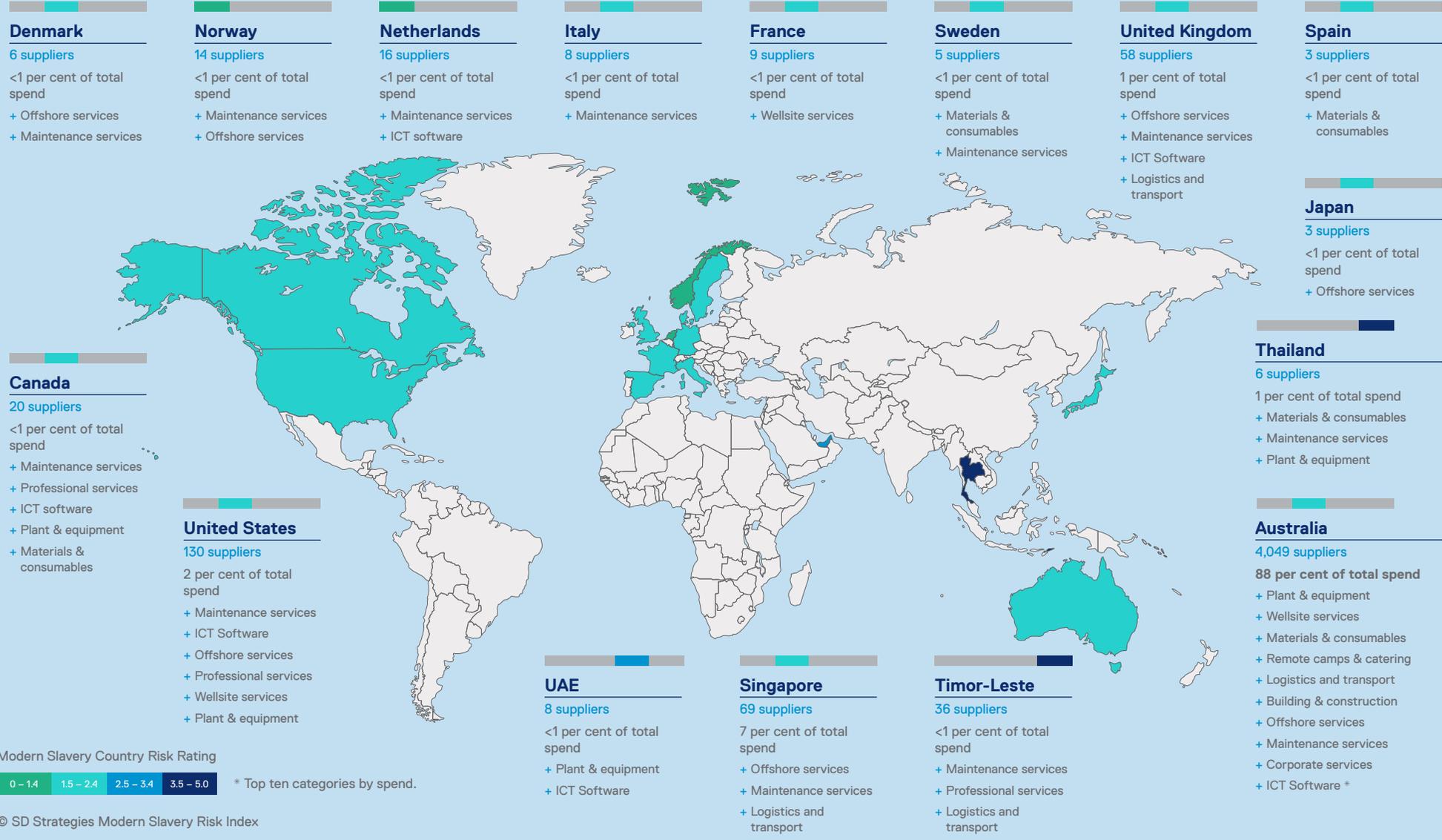
Oil Search entities spent A\$407.7 million on goods and services in 2021. A\$292.2 million was spent with Tier 1 suppliers with annual spend of over A\$1 million per supplier.

Additional due diligence for modern slavery risk of our consolidated supply chain will be undertaken in 2022.

### Total procurement spend by entity (per cent)



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



Modern Slavery Country Risk Rating



\* Top ten categories by spend.

Case study 2

## Our merged supply chains: Santos and Oil Search

On 17 December 2021 Santos merged with Oil Search, the biggest oil and gas company and investor in Papua New Guinea (PNG) and controlling a world class portfolio of oil leases on the Alaskan North Slope, USA. Oil Search published preliminary Modern Slavery Statements for 2018 and 2019 and a mandatory Statement in accordance with the Modern Slavery Act 2018 (Cth) for the 2020 reporting year. The 2020 Statement outlines Oil Search's commitment to applying the UN Guiding Principles on Business and Human Rights and the principles of the UN Global Compact in its practices and procedures, including those addressing responsible sourcing.

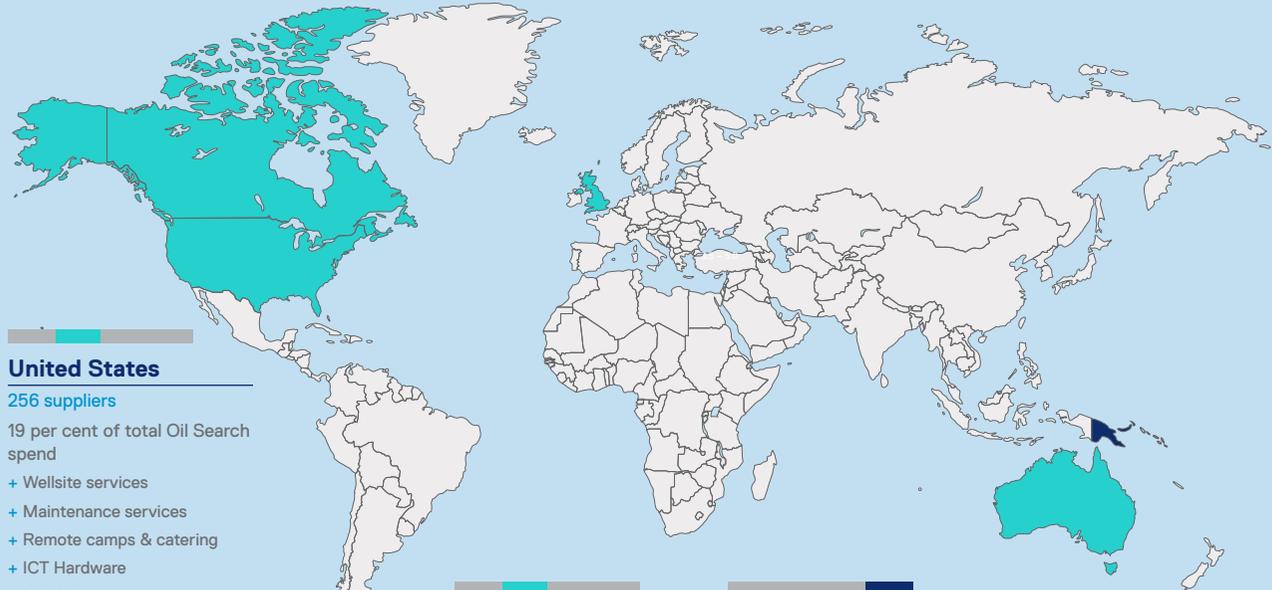
Tier 1 suppliers in Oil Search's PNG and North American operations were separately assessed for potential modern slavery risk using the same methodology adopted by Santos over the last two reporting cycles.

Analysis of close to A\$231 million of spend (equating to 59 suppliers with spend above A\$1 million) of Oil Search's PNG operations identified 51 per cent of spend (or 27 suppliers) as potentially high-risk for modern slavery. Just under half of this spend is with suppliers in PNG and most of the remaining spend is with Australian-based suppliers. These suppliers are predominantly in the categories of building, construction and fabrication, remote camp services, and consumables and materials.

Analysis of just over A\$55 million of spend (17 suppliers with spend above A\$1 million) in Oil Search's North American operations identified five per cent of spend as potentially high-risk for modern slavery. Most suppliers are based in the United States or Canada, with labour hire being the sole high-risk category with spend above A\$1 million per supplier.

A more detailed combined analysis of Santos and Oil Search suppliers will be undertaken in our next reporting cycle.

### Oil Search : Tier 1 Supplier Locations >A\$1 million per country



#### United States

256 suppliers

19 per cent of total Oil Search spend

- + Wellsite services
- + Maintenance services
- + Remote camps & catering
- + ICT Hardware
- + ICT Software
- + Corporate services
- + Professional services
- + Building & construction
- + Plant & equipment
- + Labour hire\*

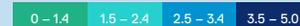
#### Canada

15 suppliers

2 per cent of total Oil Search spend

- + Wellsite services
- + Maintenance services
- + Corporate services
- + Professional services
- + ICT software

Modern Slavery Country Risk Rating



#### United Kingdom

28 suppliers

1 per cent of total Oil Search spend

- + Wellsite services
- + Maintenance services
- + ICT Software
- + Logistics and transport

#### Singapore

25 suppliers

2 per cent of total Oil Search spend

- + Offshore services
- + Maintenance services
- + Logistics and transport

#### Papua New Guinea

361 suppliers

31 per cent of total Oil Search spend

- + Building & construction
- + Materials & consumables
- + Maintenance services
- + Plant & equipment
- + ICT Hardware
- + Corporate services
- + Professional services
- + ICT Software
- + Plant & equipment
- + Labour hire\*

#### Australia

576 suppliers

45 per cent of total Oil Search spend

- + Building & construction
- + ICT Software
- + Plant & equipment
- + Wellsite services
- + Materials & consumables
- + Professional services
- + Corporate services
- + Real estate management
- + Logistics and transport
- + Corporate services\*

\* Top ten categories by spend.

© SD Strategies Modern Slavery Risk Index



Reporting Criteria 3

# Modern slavery risks in operations and supply chain

Risk management

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Supply chain risks

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Risk by spend

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Risk by number of suppliers

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Risk by spend category

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Risk by supplier location

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## Risk management

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. In assessing our relationship to modern slavery risks, we work to align with the UN Guiding Principles on Business and Human Rights (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.

While the risk of modern slavery conditions occurring within our own operations in Australia is low (given the nature of our workforce, strict adherence to regulatory requirements and internal policies and governance processes), our expanded operating footprint in PNG has increased our risk in this area.

We are working on enhancing oversight of all operations we own and control in PNG and ensuring our potential to cause or contribute to modern slavery is diminished or reduced.

We recognise that there are 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. We are also conscious that we may support, through donations or advocacy, organisations involved in modern slavery, particularly in PNG and Timor-Leste. We are working to identify, assess and address all potential risks.

We have mapped our relationship to modern slavery risk and our obligation and commitment to providing remedy against the UNGPs, utilising the Finance Against Slavery 2019 framework.

## Supply chain risks

Following the completion of the merger between Santos and Oil Search in December 2021, we updated our supplier prioritisation dashboards and undertook separate risk assessments for suppliers in our newly merged assets in Papua New Guinea and North America. Potential risks for modern slavery were determined according to 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, seasonality, franchising and aggressive pricing.
- + **Commodity/product** – specific products and commodities or raw materials deemed as high-risk by the US Department of Labor's 2021 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 13 global indices. High-risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State's failure to protect human rights. 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 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 construction of infrastructure.<sup>1</sup>

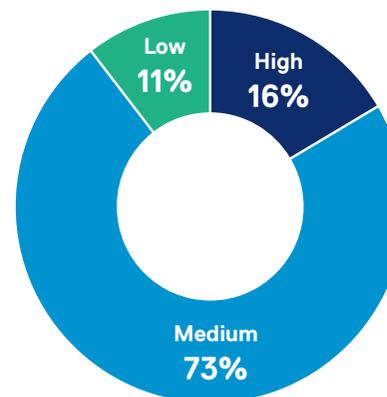
As with our 2019 and 2020 statements, our focus in 2021 continued to be on suppliers with annual spend above A\$1 million. We acknowledge that lower spend suppliers also present modern slavery risks and vulnerabilities. It is our intention to consider a broader review and risk prioritisation of our lower spend, potentially high-risk suppliers in future years.

## Risk by spend

Analysis of just over A\$3.5 billion of spend in Santos' supply chain (i.e. 364 suppliers with spend above A\$1 million) identified 16 per cent of spend as potentially higher risk for modern slavery.

This is a significant decrease from the 43 per cent potential high-risk by spend identified in our 2020 statement. The reduced risk ranking is a result of our enhanced supplier due diligence activities, including our supplier deep dive assessments and implementation of Corrective Action Plans (CAPs). Enhanced due diligence on 23 of our potentially highest risk suppliers (see Case Study 3) resulted 19 suppliers having a residual risk rating of medium and four suppliers with a residual risk rating of high. We continue to work with all 23 suppliers to ensure effective implementation of our corrective action requests.

### Risk by spend (per cent of spend assessed as high, medium or low modern slavery risk)



Enhanced due diligence on 23 of our potentially highest risk suppliers resulted in 19 suppliers having a residual risk rating of medium and four suppliers with a risk rating of high. We continue to work with all 23 suppliers to ensure effective implementation of our corrective action requirements.

1. Resources, Energy and Modern Slavery 2021 <https://assets.kpmg/content/dam/kpmg/au/pdf/2021/resources-energy-sector-modern-slavery-practical-guide.pdf>

Case study 3

## Supplier deep dive assessment 2021

Our 2020 Modern Slavery Statement documented outcomes of our Supplier Self-Assessment Questionnaire or SAQ conducted with 14 potentially high-risk suppliers.

These suppliers accounted for just over 50 per cent of our annual high-risk spend, for suppliers with spend >A\$1 million (see Case Study 3, Page 19 Santos Modern Slavery Statement 2020).

In 2021 we extended our supplier due diligence program to include suppliers who make up 75 per cent of our annual high-risk spend (for suppliers with spend >A\$1 million). An additional 10 suppliers were invited to complete the SAQ from the following high-risk categories:

- + consumables / materials
- + maintenance services
- + logistics (transport and marine)
- + waste management
- + building, construction and fabrication.

We continue to work with suppliers whose questionnaires are outstanding to address this and where necessary, identify other ways to identify and address risks posed by their activities.

Key findings were largely consistent with the 2020 supplier SAQ findings and are included below:

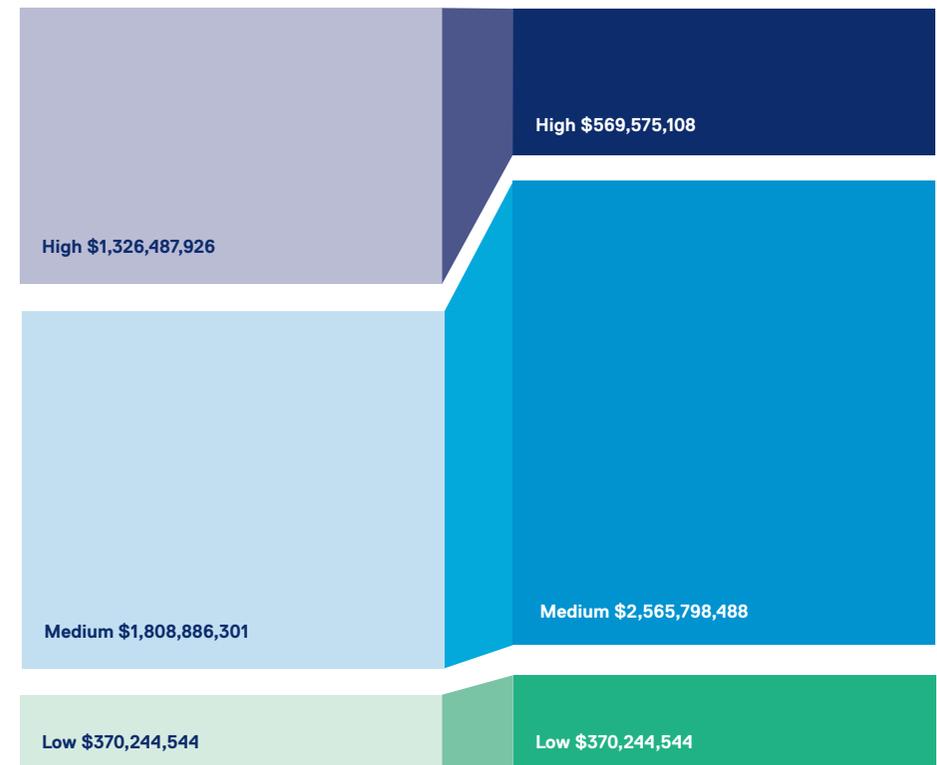
- + There are definite leaders among Santos' suppliers who can help inform good practice approaches across their respective industry sectors.
- + Suppliers operate in diverse geographic locations, including several high-risk countries and regions.
- + Many suppliers rated modern slavery as a low or medium risk in operations and supply chains, however many source commodities from high-risk geographies and industry sectors and use a potentially vulnerable workforce.
- + Some suppliers underestimate the level of risk in their operations and supply chains and overestimate the effectiveness of their management systems. We are undertaking additional due diligence of these suppliers.
- + Worker protections are poorly implemented or enforced by some suppliers.
- + Suppliers need to develop specific programs to educate and communicate modern slavery commitments to staff, contractors and suppliers.
- + Some of our suppliers' contracts and codes of conduct (especially those suppliers headquartered overseas) do not include modern slavery clauses and there is limited engagement of our suppliers' suppliers.

Risk-based reports and improvement recommendations have been issued to each supplier, along with Corrective Action Plans. Our Category Managers are working closely with suppliers to review and implement the corrective actions (see Case Study 4).

Supplier due diligence including supplier engagement, deep dive risk assessments, review of documentation, and implementation of corrective action requests resulted in a 27 per cent reduction in spend classified as high-risk in 2021. Three-quarters of suppliers assessed as potentially high-risk were risk assessed to medium risk following implementation of due diligence processes.

### Potential risk rating

### Adjusted risk rating



Case study 4

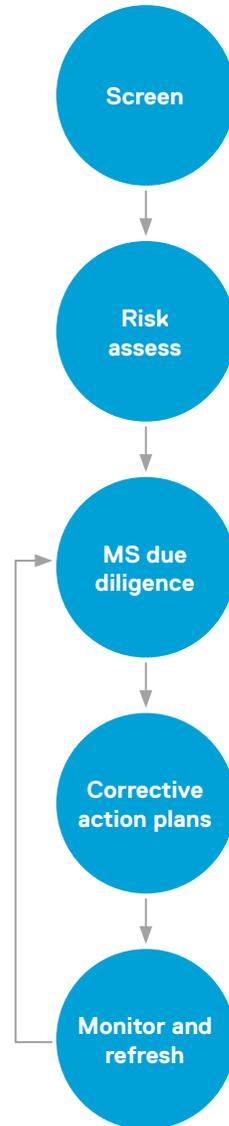
### Implementing corrective actions with an initial 14 high-risk suppliers

Our initial deep dive supplier modern slavery assessments (SAQs) of 14 suppliers classified as potentially high-risk provided an opportunity to identify gaps in systems and processes used to manage risk and to work with those suppliers to enhance their risk controls while mitigating Santos' risk. Corrective Action Plans (CAPs) were developed with all 14 suppliers, with a number of corrective actions requests issued. Our Category Managers worked closely with these suppliers to identify improvement opportunities and provide support where necessary. As a result of this process, all 44 priority corrective actions were implemented.

By way of example, our assessment of an overseas-based heavy engineering company identified 16 improvement actions. Santos worked with this supplier to implement increased due diligence of their suppliers, including enhanced supplier vetting, development of new contract terms and conditions and implementation of ongoing monitoring. Given the jurisdiction generally has a low maturity of modern slavery risk management practices, we were able to share our own journey to suggest ways the supplier could develop their approach. Over six months, the supplier closed out all actions and is considered to have a lowered residual risk.

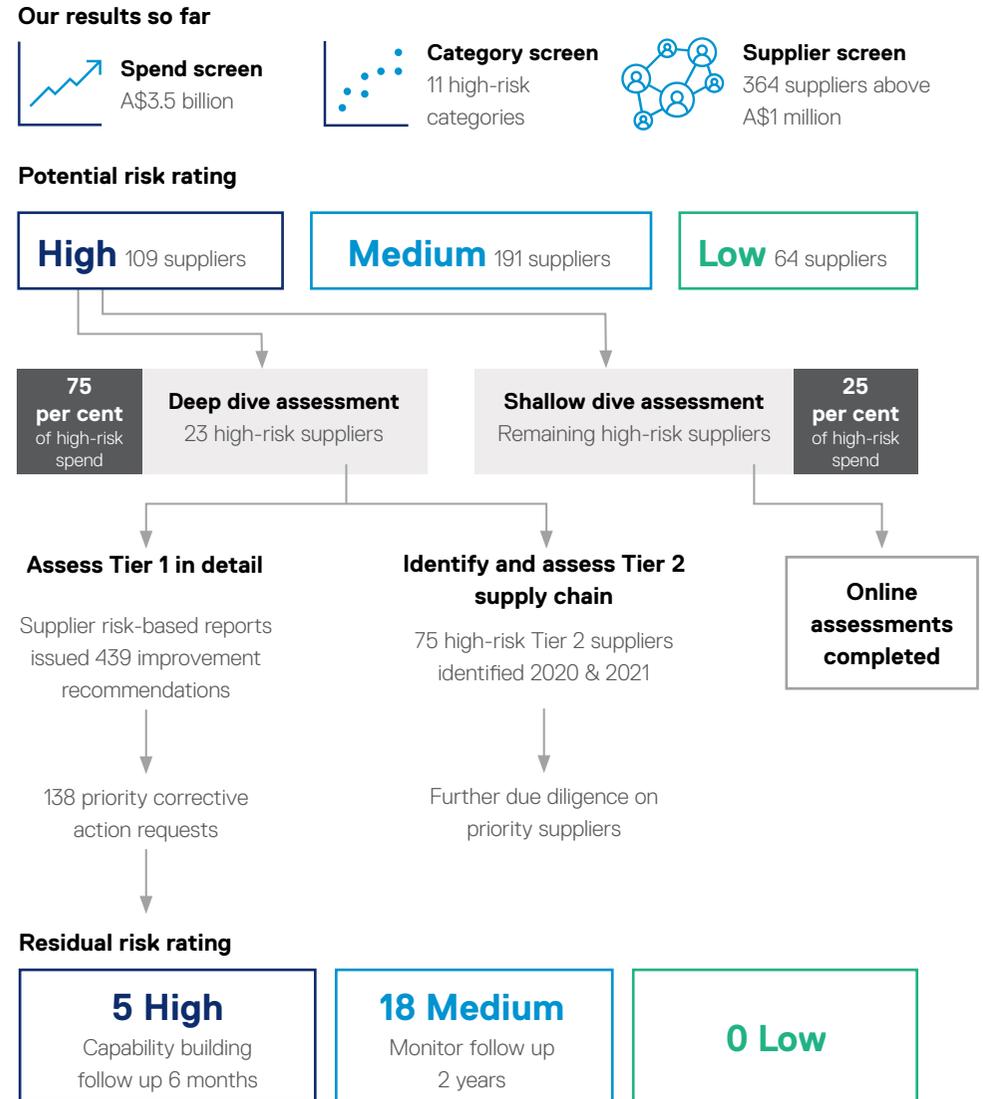
For this initial round of supplier assessments, a total of 157 corrective action requests were issued to the re-classified medium risk suppliers. 153 of these have now been effectively implemented. Four actions remain in progress and will be fully closed out in 2022.

The corrective action planning process adopted by Santos ensures our Category Managers understand the modern slavery risks in our supply chain and enables them to continue to build positive relationships with our priority suppliers.



### Our supplier due diligence approach over two reporting cycles

We undertook an additional nine deep-dive supplier assessment during this reporting period. The infographic below provides an overview of outcomes over two reporting periods.



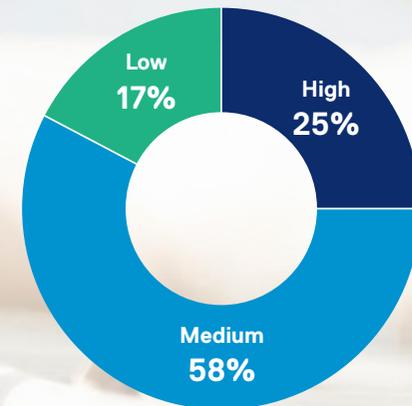


## Risk by number of suppliers

Analysis of suppliers with spend above A\$1 million identified that 91 of the 364 suppliers assessed (or 25 per cent) are potentially higher risk for modern slavery.

We will continue to explore potential risk of the goods and services procured by our Tier 1 suppliers to enable us to gain a better understanding of potential risk in our extended supply chain both in Australia and internationally.

**Risk by supplier number (per cent of suppliers assessed as high, medium or low modern slavery risk)**



# Risk by spend category

Based on the four risk factors outlined previously, approximately one-third (11 out of 30) of our spend categories present a higher risk for modern slavery. Major categories of potentially high risk are outlined below. The actions taken to address and assess risks are outlined on pages 29 - 32 of this Statement.

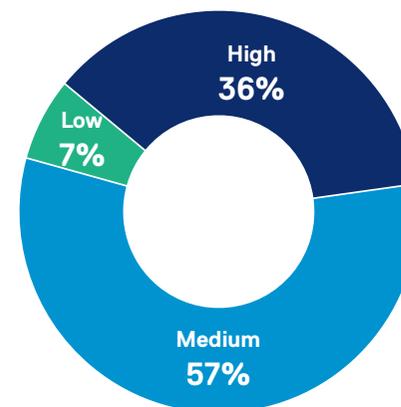
Category	Typical forms of modern slavery and potential risk indicators			
<b>Building, construction and fabrication services</b>	Exploitation of migrant labour	Use of labour hire contractors	Human trafficking	
<b>Production facility maintenance services</b>	Exploitation of migrant labour	Use of labour hire contractors		
<b>Logistics including land transport and marine services</b>	Exploitation of migrant workers	Excessive working hours	Forced labour	Poor WHS and hazardous workplaces
<b>Operational consumables, materials and supplies</b>	Deceptive recruitment	Worst forms of child labour	Forced labour	Precarious labour in supply chains
<b>Labour hire</b>	Deceptive recruitment	Bonded labour		
<b>Camps and camp services such as catering and hospitality</b>	Exploitation of migrant labour or base skill labour	Forced and bonded labour	Underpayment of wages	Excessive working hours
<b>Building and engineering materials</b>	Deceptive recruitment	Worst forms of child labour	Forced labour	Precarious labour in supply chains
<b>Waste management and recycling</b>	Exploitation of migrant labour	Poor WHS and hazardous workplaces		
<b>ICT hardware, electrical components and equipment</b>	Deceptive recruitment	Worst forms of child labour	Forced labour	Conflict minerals
<b>Real estate and building services such as cleaning, maintenance and security</b>	Exploitation of migrant labour	Precarious labour conditions		
<b>Well-site services and operational support</b>	Exploitation of migrant labour	Use of labour hire contractors	Forced labour	Poor WHS and hazardous workplaces

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 skill and vulnerable workers.

While the risk of modern slavery in Australia is lower than many other jurisdictions (according to Global Slavery Index data), we recognise that our Australian suppliers (who make up 88 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 some of our international suppliers predominantly those across Asia, Europe and North America.

**Risk by spend category (per cent of categories assessed as high, medium or low modern slavery risk)**



\*not including Oil Search spend data

## Risk by supplier location

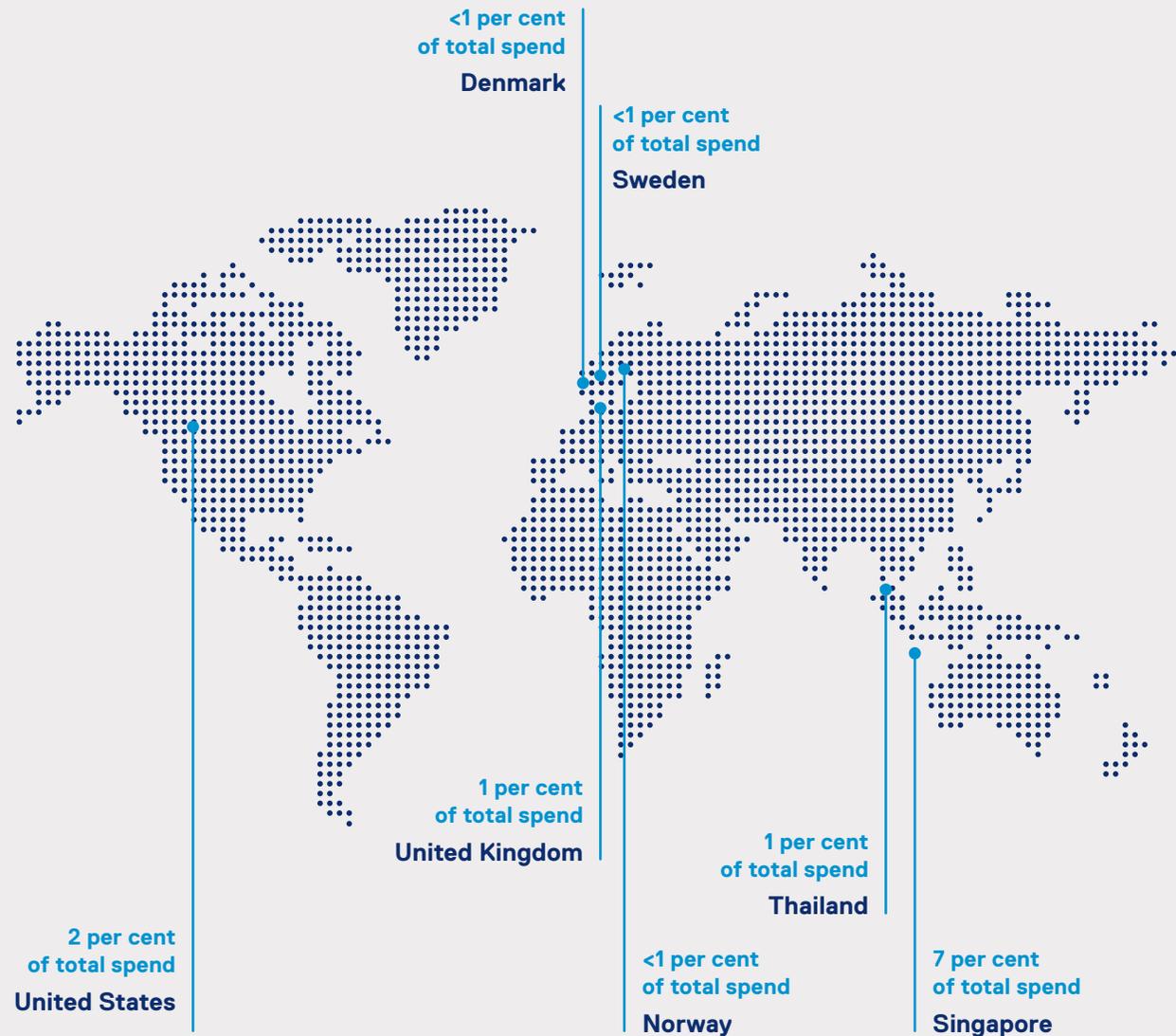
12 per cent of spend analysed for modern slavery risk is with suppliers located overseas. While we use suppliers across 33 countries (outside Australia), 95 per cent of those with more than A\$1 million in spend are located in seven countries:

- + Denmark
- + Norway
- + Singapore
- + Sweden
- + Thailand
- + United Kingdom
- + United States

According to published information including the Global Slavery Index, Thailand (which accounts for less than 1 per cent of our total spend) poses the greatest risk for modern slavery.

We have implemented specific steps to better understand and manage potential modern slavery risks in North America and Papua New Guinea (see Case Study 1 and Case Study 2).

We acknowledge the increased vulnerability to modern slavery in PNG and will continue to work with our team in PNG to better understand, assess, address and mitigate this risk.



Reporting Criteria 4

# Actions taken to assess and address risk

Actions implemented in 2021

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# Actions implemented in 2021

In 2021 our focus was on further integrating our modern slavery risk management processes into company policies, procedures and operations.

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 our priority suppliers. Our 2021 modern slavery risk management activities are outlined to the right.

## Our governance maturity specific to modern slavery

	Starting out	End 2019	End 2020	2021
Management Systems	●●●●	●●●●	●●●●	●●●●
Risk Management	●●●●	●●●●	●●●●	●●●●
Procurement and Supply chain	●●●●	●●●●	●●●●	●●●●
Human Resources & Recruitment	●●●●	●●●●	●●●●	●●●●
Customers and Stakeholders	●●●●	●●●●	●●●●	●●●●

© SD Strategies Bridge the Gap Platform

- Baseline
- Starting out
- Making Progress
- Good Practice
- Leading Practice

## Modern slavery working group

Our working group comprised of senior representatives from our procurement, supply chain, risk and audit, legal and sustainability functions continued to meet to review progress against our modern slavery action plan and due diligence processes.

## Operational gap analysis (update)

At the end of the 2021 reporting year, we re-completed the modern slavery gap analysis to enable us to track our progress against key areas of operation and modern slavery indicators. While we are pleased with the progress we have made, the analysis identified areas that will require an increased focus in 2022.

## Modern slavery action plan and road map

The action plan and road map developed by our working group in 2019 continued to guide our modern slavery risk management actions. We have updated the road map to reflect our changing risk profile and merger with Oil Search (see our modern slavery snapshot and road map on pages 5 and 6).

## Integration of modern slavery risk management approaches into expanded business operations

During 2021 we consulted and engaged staff and management from our newly acquired assets to ensure all assets are operating under the Santos Management System. This involved further training of procurement staff from the recently acquired ConocoPhillips ABU-W organisation and updating of the risk heat map for the expanded business.

## Updated source to contract and contractor management procedures

We further enhanced the Santos procurement processes and documentation to ensure human rights and modern slavery issues are properly considered in the evaluation, selection and award of new contracts. These improved procedures and templates help to ensure modern slavery issues are considered and form part of any award recommendation for new contracts. The procurement staff, contract representatives and contract sponsors were trained on the updated procurement procedures.

## Modern slavery contract clauses

We included modern slavery contract clauses in Santos procurement contract templates, meaning all new contracts now include provisions ensuring the supplier or contractor must comply with relevant modern slavery and labour rights laws and expectations and also represent that they are not providing any services or materials sourced or produced using any form of modern slavery.

We assess our priority (highest potential risk) suppliers against contract requirements through our deep-dive and shallow-dive assessments and regular supplier meetings (typically quarterly or biannual) managed by our category managers.

## Supplier risk identification and prioritisation

We updated our supplier risk prioritisation for 2021, considering the results of our supplier deep dive assessments and other due diligence programs. We also undertook a separate assessment of procurement spend and risk posed by our newly acquired PNG asset (Oil Search Limited). The combined data will provide a path forward to our ongoing supplier modern slavery due diligence initiatives (see Case Study 2).

## Supplier engagement and deep-dive surveys

We engaged nine of our highest risk/highest spend suppliers in a deep-dive risk-based analysis. Together with 14 suppliers previously assessed, these suppliers account for 75 per cent of our high-risk spend. Suppliers were provided with detailed reports and recommendations which have informed Corrective Action Plans and ongoing supplier engagement (see Case Study 3). The deep dive assessment included requirements for suppliers to provide names of their direct suppliers within the Santos extended supply chain. These suppliers have been mapped against modern slavery risk indicators, with outcomes of this process informing our ongoing due diligence approach for Tier 2 suppliers.

## Modern slavery awareness training

We developed a modern slavery e-learning module that was launched to all procurement and business staff involved in the evaluation, selection and award of new contracts. Topics include:

- + forms and prevalence of modern slavery globally
- + modern slavery legislation in Australia
- + global supply chains and Santos' supply chain risk analysis
- + Santos' policies and procedures to manage modern slavery risk
- + conducting supplier due diligence
- + grievance mechanisms and our response process

Modern slavery training and awareness was also undertaken in our PNG and North American operations.

## Whistleblower hotline

Recognising the importance of making it safe for all workers, including those working for our contractors and suppliers, to freely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct, we continue to actively promote our independent, confidential external hotline. Our Reporting Misconduct (Whistleblower) hotline, details of which are provided on our website, in our Code of Conduct and supplier communications, enables workers, including those working for our contractors and suppliers, to freely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct. In 2021 there were no allegations of misconduct relating to labour rights. We will continue to formulate our remedy pathway and engage with relevant agencies and service providers in the jurisdictions we operate to ensure an effective modern slavery and human rights response and remedy process can be implemented.

## Case study 5

### Modern slavery e-learning module

In 2021 we developed a bespoke modern slavery e-learning module for Santos' management team and procurement staff. The module includes detailed information on the forms of modern slavery and the vulnerabilities in Santos' operations and supply chain. It provides information on the Commonwealth Modern Slavery Act and ensures our personnel are aware of legislative requirements and our internal policies and standards governing modern slavery and human rights risk management.

The module was rolled out to all procurement and business staff involved in the evaluation, selection and award of new contracts during this reporting year and will be provided to a broader cross-section of personnel in 2022.



Case study 6

### Investigating potential risk across Tier 2 suppliers

In 2020 we reported on results of a preliminary (high level) risk analysis of seventy (70) Tier 2 suppliers (used by fourteen Tier 1 high-risk suppliers) who are considered crucial to the delivery of their contract with Santos (see Case Study #1 page 17, Santos Modern Slavery Statement 2020).

We repeated this process for our Round 2 Supplier Deep Dive Assessments (see Case Study 3) with participating suppliers providing details of 47 suppliers they use to support the delivery of goods and services to Santos. Results of the risk analysis were consistent with 2020 findings:

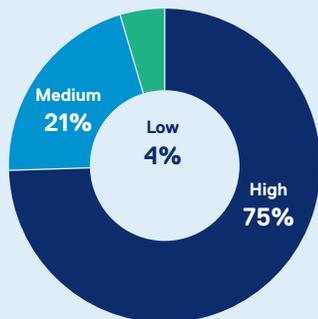
- + 75 per cent of Tier 2 suppliers were ranked as potentially high-risk for modern slavery (58 per cent were high-risk in the 2020 analysis)
- + The three major high-risk Tier 2 supply categories are:
  - Logistics: transport and marine
  - Building and engineering materials
  - General consumables and materials
- + The percentage of high-risk Tier 2 suppliers is significantly greater than the percentage of Santos' high-risk Tier 1 suppliers (75 per cent versus 16 per cent respectively)

Given the specialised requirements of the resources sector, some Tier 2 suppliers provide goods and services to both Santos and to our Tier 1 suppliers. These results further our visibility of potential risk into the lower tiers of our supply chain, helps to identify opportunities to work with shared suppliers and increases our ability to manage risk across our extended supplier network.

**Tier 2 supplier data collection identified 47 Tier 2 suppliers in 2021 across three major procurement categories.**

**Of these, 75 per cent are potentially high-risk, 21 per cent medium risk and 4 per cent lower risk for modern slavery.**

Per cent 'Tier 2 suppliers' by potential risk



Case study 7

### Working in partnership with landholders and local suppliers

Santos aims to make meaningful, positive long-term contributions in the communities where we operate and deliver tangible benefits including local employment and training, infrastructure investment, provision of essential services, sponsorship and use of local suppliers. Aligning our approach to Sustainable Development Goal (SDG) 12 (Responsible Consumption and Production) and SDG 11 (Sustainable Cities and Communities) we maximise opportunities for local and indigenous suppliers to increase their capability and capacity to supply within targeted categories.

In 2021 we spent US\$339 million on PNG owned and operated suppliers, employees, shareholders and community investment programs and to government in royalties, levies and taxes. We contributed US\$12.2 million towards community health, education, livelihood and gender outcomes, including through the Oil Search Foundation.

Promoting the inclusion and development of local businesses is a key principle underpinning our contracting and procurement strategies. We have purchasing guidelines and seek opportunities to work with other suppliers to apply the same principles in their supply chain. We have direct contractual relationships with several businesses established by members of local communities. Alaska Native Corporations and PNG Landowner Companies (Lancos) provide many core services to us, including drilling support, security, camp management, catering, ice roads, general maintenance and transportation.

Throughout 2021 we continued to work closely with our PNG landowner companies (Lancos), many of whom are heavily reliant on us to ensure their sustainability in an increasingly challenged business environment due to the ongoing pandemic. We continued our partnership with the PNG Fresh Produce Development Agency (FPDA), and local landowner companies, to improve the accessibility of the commercial agriculture industry for community members in Gobe, Moran, Kutubu, Kikori and Hides. In Gobe in 2021 this included the delivery of five model farms to participants. These farm kits are designed to demonstrate viable commercial farming techniques that can be adopted and sustained by local communities. In collaboration with local participants, we identified target crops for testing in the model farms.



## Reporting Criteria 5

# Effectiveness assessment

Elements of an effective response

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Our effectiveness indicators

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## Elements of an effective response

Our modern slavery risk management action plan and due diligence processes will continue to be reviewed regularly as part of our corporate sustainability and risk management reviews.

Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain and continue to work on the best approach to measuring the effectiveness of our actions.

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.
- + **Engagement, assessment & management:** 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 have the hard conversations with our potentially highest risk suppliers and building trusted relationships to ensure our expectations are met and corrective action requests are implemented in timeframes acceptable to both parties.

In 2021, we assessed the effectiveness of our actions against the key indicators on page 36 of this Statement. We recognise that we have more work to do to effectively measure and assess both process and outcomes indicators.



# Our effectiveness indicators

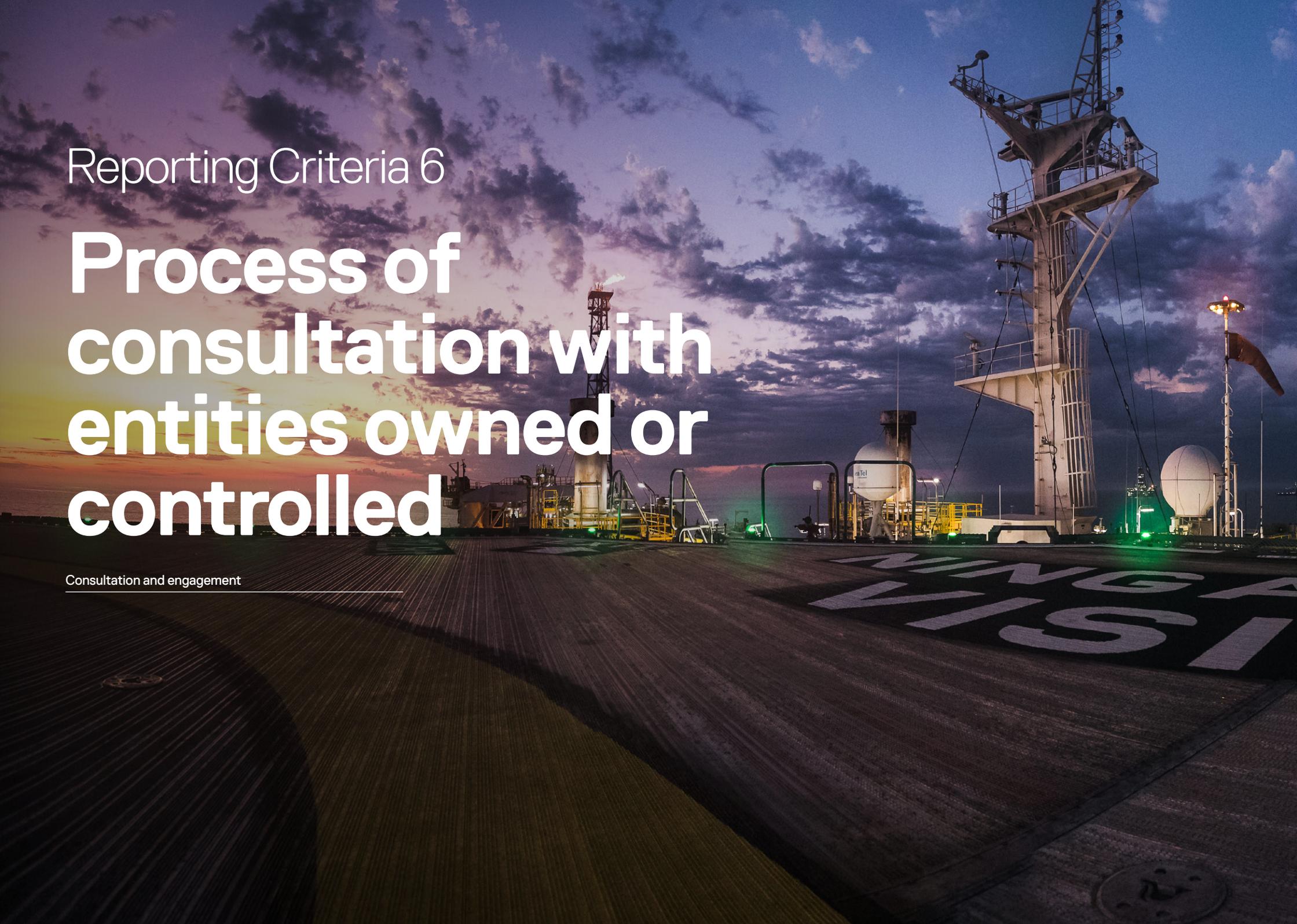
Area of focus	Activity	Qualitative indicators	Quantitative indicators
<b>1</b> <b>Governance &amp; due diligence</b>	<ul style="list-style-type: none"> <li>+ Ongoing review and update of Code of Conduct</li> <li>+ Newly acquired assets integrated into Santos Management System</li> <li>+ JV partner management</li> <li>+ Ongoing review of management systems</li> </ul>	<ul style="list-style-type: none"> <li>+ Human rights and labour rights included in company policies and procedures</li> <li>+ Engagement and education of JV partners</li> <li>+ Maturity assessment targets documented</li> </ul>	<ul style="list-style-type: none"> <li>+ Per cent policies reviewed, updated and integrated</li> <li>+ Number of JV partner meetings held to address this issue</li> <li>+ Number of modern slavery maturity targets achieved</li> <li>+ Number of human rights or labour rights risks identified and documented in risk register</li> <li>+ Number of Board engagements / presentations in 12 months</li> </ul>
<b>2</b> <b>Risk management</b>	<ul style="list-style-type: none"> <li>+ Review of Enterprise Risk Framework</li> <li>+ Bow tie risk assessment focused on human rights and labour rights</li> </ul>	<ul style="list-style-type: none"> <li>+ Board review and update of Enterprise Risk Management Framework</li> <li>+ Enhanced understanding and discussion of human rights and labour rights risks</li> <li>+ Increased understanding across workforce on potential modern slavery risks in different operating environments</li> </ul>	<ul style="list-style-type: none"> <li>+ Number of risk mitigation actions implemented</li> </ul>
<b>3</b> <b>Procurement &amp; supply chain</b>	<ul style="list-style-type: none"> <li>+ Shallow dive supplier risk assessments</li> <li>+ High-risk supplier screening</li> <li>+ Identify Tier 2 suppliers</li> <li>+ Supplier qualification processes</li> <li>+ Contract management requirements</li> </ul>	<ul style="list-style-type: none"> <li>+ Engagement and education of suppliers</li> <li>+ Shallow dive questionnaires sent to all potentially high-risk suppliers</li> <li>+ Number of highest risk suppliers invited to complete deep dive assessments</li> <li>+ Number of supplier contracts that include modern slavery clauses</li> </ul>	<ul style="list-style-type: none"> <li>+ Per cent suppliers engaged and trained</li> <li>+ Per cent supplier responses to shallow dive survey</li> <li>+ Per cent suppliers responding to deep dive assessments and uploading supporting documentation</li> <li>+ Number of corrective action requests issued and completed</li> <li>+ Per cent of supplier contracts with modern slavery clauses</li> </ul>
<b>4</b> <b>Training &amp; education</b>	<ul style="list-style-type: none"> <li>+ Employee, management and executive engagement and training</li> <li>+ Development of Santos specific e-learning module</li> </ul>	<ul style="list-style-type: none"> <li>+ Staff participate in training</li> <li>+ Enhanced organisational awareness of modern slavery risks – including increased discussion among all personnel</li> </ul>	<ul style="list-style-type: none"> <li>+ Per cent relevant staff trained</li> <li>+ Per cent new inductees trained in updated Code of Conduct</li> </ul>
<b>5</b> <b>Grievances and reporting</b>	<ul style="list-style-type: none"> <li>+ Reporting Misconduct (whistleblower) hotline</li> <li>+ Modern Slavery Statement</li> </ul>	<ul style="list-style-type: none"> <li>+ Whistleblower hotline actively communicated</li> <li>+ Per cent of issues effectively addressed</li> <li>+ Alignment of grievance mechanism to UNGPs</li> <li>+ Modern Slavery Statement submitted on time</li> </ul>	<ul style="list-style-type: none"> <li>+ Total number of issues raised</li> <li>+ Per cent of issues effectively addressed</li> <li>+ Number of stakeholder engagements held on grievance and remedy</li> </ul>

Reporting Criteria 6

# Process of consultation with entities owned or controlled

Consultation and engagement

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## Consultation and engagement

**Santos undertook extensive consultation with the Oil Search modern slavery risk management team following our merger in December 2021.**

This included several on-line and in-person meetings, and close involvement in the preparation of our 2021 Modern Slavery Statement.

All subsidiaries within the Santos group are wholly owned. A list of our controlled entities is included in the 2021 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 human rights. 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 human rights impacts.

In 2021 Oil Search engaged with our joint venture partners ExxonMobil and TotalEnergies to understand their approach to managing human rights and modern slavery issues. In 2022, we will explore opportunities to deepen our engagement with joint venture partners and non-controlled entities on our responsible sourcing and modern slavery practices.



## Reporting Criteria 7

# Other information

Definitions and abbreviations

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## Definitions and abbreviations

Abbreviation	Definition
<b>Carbon Capture and Storage (CCS)</b>	Carbon Capture and Storage (CCS) is a process in which carbon dioxide (CO <sub>2</sub> ) from industrial and energy-related sources is separated (captured), conditioned, compressed, transported and injected into a geological formation that provides safe and permanent storage deep underground
<b>Clean fuels</b>	Clean fuels refer to fuels which have the potential to materially reduce Scope 1, 2 and/or 3 greenhouse gas emissions. Hydrogen is an example of a clean fuel with no end-use combustion emissions and the potential for low Scope 1 and 2 emissions when produced from natural gas combined with CCS or when produced from renewable sources
<b>Cleaner energy / Cleaner fuels</b>	Refer to energy sources that are used for power generation, transport, industrial processes or heating which have lower emissions of greenhouse gases or air pollutants (Nox, Sox and particulates) than other fuel sources. Natural gas is an example of a cleaner energy source/fuel, as it has lower greenhouse gas emissions than coal when used in power generation.
<b>Company</b>	Santos Ltd and all its subsidiaries
<b>FEED</b>	Front end engineering design
<b>FID</b>	Final investment decision
<b>LNG</b>	Liquefied natural gas, being natural gas that has been liquified by refrigeration or pressure to store or transport it
<b>Net Zero</b>	In relation to greenhouse gas emissions, (also referred to as carbon neutral) 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
<b>Net-zero emissions</b>	Net Zero Scope 1 and Scope 2 greenhouse gas emissions; when referring to Santos, meaning net-zero equity share of these emissions
<b>Santos people/our people</b>	Employees, officers and directors; contractors, agents, consultants and subcontractors; and apprentices, trainees, secondees, students gaining work experience, and volunteers
<b>Tier 1 suppliers</b>	Suppliers directly contracted by the company
<b>Tier 2 suppliers</b>	Suppliers sub-contracted by Tier 1 suppliers to the company
<b>Tier 3 suppliers</b>	Suppliers sub-contracted by a Tier 2 supplier

# 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)<sup>1</sup> (“the Act”) on

23 June 2022

## 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.	2
b) Describe the reporting entity's structure, operations and supply chains.	10 - 21
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.	22 - 28
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.	5 & 6, 8 & 9, 29 - 32
e) Describe how the reporting entity assesses the effectiveness of these actions.	33 - 35
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).*	36 - 37
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	38 - 39