

## **DIAMOND GAS RESOURCES PTY LTD MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This Modern Slavery and Human Trafficking Statement (Statement) is made pursuant to the [Modern Slavery Act 2018](#) (Cth) ('the Act') by Diamond Gas Resources Pty Ltd (ABN 58 007 440 664) ('DGR'). This Statement relates to the financial year 1 April 2023 to 31 March 2024 ('FY2023').

### **About DGR – Company Overview**

DGR is a wholly owned Australian subsidiary of Mitsubishi Corporation ('MC'), incorporated in Japan. MC is a global integrated business enterprise that develops and operates businesses across virtually every industry, including environmental energy, material solution, mineral resources, urban development & infrastructure, mobility, food industry, smart-life creation, power solution,. MC's current activities have expanded beyond its traditional trading operations to include project development, production and manufacturing operations, working in collaboration with our trusted partners around the globe.

For more information on MC's business groups and their activities, please visit the following link: <https://www.mitsubishicorp.com/jp/en/bg/group.html>

DGR can be characterized as a reseller of crude oil, condensate and LNG. DGR buys condensate and LNG from an Australian-related party Japan Australia LNG (MIMI) Pty Ltd ('MIMI') for on-sale. That is, DGR performs a condensate and LNG sales and marketing function.

MIMI holds an interest in the North West Shelf Project (NWS Project), which is a substantial offshore and onshore oil and gas project in Western Australia. MIMI is ultimately owned 50% by Mitsubishi Corporation and 50% by Mitsui and Co., Ltd.

During FY2023, DGR had no employees. Through the engagement of service providers, DGR performs all functions associated with the purchase and sale of condensate and LNG. The three main service providers are MIMI, Diamond Gas International Pte. Ltd.(DGI), and Mitsubishi Corporation New Transportation Fuels Business Department (MC) (all affiliates); DGR buys commodities from MIMI and sells LNG to DGI and Condensate to MC. In other words, DGI and MC serve as marketing hubs for their respective commodities. In addition, DGR's administrative operations (accounting and other functions necessary for company continuity) are outsourced to EY.

The Directorate of DGR was composed of five Directors during FY2023, with a geographical distribution of two Directors based in Australia and three in Japan. It should be mentioned that the organizational structure of DGR does not include the role of an Executive Director. Furthermore, each Director is accorded equal rights and responsibilities.

**【Directors at the end of FY2023(31<sup>st</sup> Mar 2024)】**

- Gen Kunihiro (in Japan)

- Shinobu Takishima (in Australia)
- Sawako Nakanishi (in Australia)
- Yuichiro Saito (in Japan)
- Toru Shinojima (in Japan)

### **Risk of exposure to modern slavery**

As DGR can be characterized as a reseller of condensate and LNG and engages a number of related and third parties to perform various services on its behalf, DGR considers the risk of modern slavery within its direct business operations with related parties to be low.

DGR has conducted a matrix risk assessment of its supply chain in FY2023, to identify potential areas where DGR could be exposed to modern slavery and human trafficking risks. Matrix Risk Assessment comprehensively identifies the necessary Functions in DGR's commercial activities and the companies that perform those functions and evaluates the risks. Each risk assessment is conducted based on whether each company's corporate policy is in place and in operation. Based on the analysis, all transactions within the commercial distribution are conducted between affiliates, and to that extent, they are strictly in compliance with the parent company, Mitsubishi Corporation, and assessed that it has a low potential to expose DGR to modern slavery and human trafficking risks.

### **Actions taken to assess and address modern slavery risk, including due diligence and remediation processes**

In FY2023, DGR's modern slavery risk management actions to identify, assess, mitigate and monitor potential risk areas where DGR could be exposed to human rights concerns, including modern slavery and human trafficking included:

- The use of a modern slavery risk matrix developed in FY2020 and updated in FY2023 to help identify and assess the potential for modern slavery and human trafficking.
- The parent company MC's core philosophy is the 'Three Corporate Principles' – Corporate Responsibility to Society; Integrity and Fairness; Global Understanding through Business – which has served DGR since the company's inception and DGR ensures to uphold MC's core philosophy.
- Uphold MC's commitment to respect human rights which extends to its supply chains. MC created the [Mitsubishi Corporation Policy for Sustainable Supply Chain Management](#) ("the Policy"), which DGR including all its suppliers are expected to understand, embrace and abide by.

- Other MC policies and corporate philosophy which DGR embraces and abides by are as follows:
  - [Social Charter](#) which states that MC “will fully respect human rights” and will also “fully respect fundamental labor rights and endeavour to ensure the provision of proper working environments with consideration for safety, health and other aspects”.
  - [Basic Stance on Human Rights](#) affirms MC’s commitment to various international standards.
  - MC as a signatory of the [UN Global Compact](#) where Principle 4 of the Compact states that MC should strive for “the elimination of all forms of forced and compulsory labour”.
- Market opportunities and development in business relationships for DGR are screened through MC’s due diligence process in Tokyo. In this process, key policies related to Modern Slavery are used to assess DGR’s proposals. In addition, given that DGR's commercial distribution relies on a stable network of customers (affiliates), changes in business relationships are infrequent.
- When a modern slavery or human trafficking violation is raised, DGR will contact MC to investigate and review the business relationship with the relevant supplier. As per the Policy, “If a violation of the basic policies is confirmed, MC will demand that the relevant supplier implement corrective measures and will provide guidance and assistance to the supplier as necessary. If MC determines that the supplier is unlikely to implement corrective measures even after providing continuous guidance and assistance, MC will review its business relationship with the relevant supplier”.  
Further details of the Policy are available at the following link:  
<https://www.mitsubishicorp.com/jp/en/csr/management/supplychain.html>
- DGR directors regularly participate in MC’s training and awareness-raising programs on MC Policies and guidelines including those related to respecting human rights through business and supply chains.

### **Assessing effectiveness of modern slavery risk management**

DGR’s assessment of the effectiveness of modern slavery risk management is assessing its supply chain and other third-party relationships against the ability to detect and address modern slavery risk and also reduce possible exposure to modern slavery risk and human trafficking. DGR’s approach to modern slavery risk management is the use of modern slavery risk matrix developed in FY2020 on its business relationships together with continuing to embrace and abide by MC’s philosophy, policies and strong commitment to ensuring that its business activities do not cause or contribute to adverse human rights impacts, including modern slavery and human trafficking.

In FY, DGR's modern slavery risk management approach found:

- No instances of modern slavery or human trafficking were identified with DGR's own operations, or through engagement of related party and third parties to perform functions or services on its behalf.
- No modern slavery and/or human trafficking concerns raised with DGR.

As described above, DGR functions primarily as a paper company, characterized by its lack of direct employees and the exclusive engagement of affiliated companies as commercial partners. Therefore, DGR is basically in an environment where the risk of modern slavery or human trafficking is considered low. On the other hand, as DGR's business environment evolves, we recognize that continual monitoring of the risks will be required. Therefore, DGR will continue to adapt appropriately to the business environment change and will continue to take the steps described above, taking care to capture all risks as effectively as possible. In the event of a significant change in the business environment, the risk assessment will be reviewed and addressed appropriately.

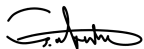
### **Process of Consultation**

We do not own or control any other entities. Therefore, Section 16(1)(f) of the Act does not apply to DGR.

### **Approval by DGR's Board of Directors**

I Shinobu Takishima, hereby certify that the information contained in the above FY2023 Modern Slavery Statement is factual, and that it was approved by DGR's Board of Directors.

27 June 2024



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Director  
Shinobu Takishima  
Diamond Gas Resources Pty Ltd