

## Modern Slavery Statement 2021

This is the statement made by Tokyo Gas Australia Pty Ltd (the “Company”) in accordance with the Modern Slavery Act 2018 (Cth) and sets out the steps taken by the Company during its financial year ending 31 December 2021 (“FY2021”) to identify and mitigate the risk of slavery and human trafficking taking place in its business and supply chains.

### 1. Reporting entities and consultation

#### a. Reporting entities

The Company qualifies as a reporting entity under the Modern Slavery Act 2018 (Cth). The Company is a wholly-owned subsidiary of Tokyo Gas Co. Ltd (“Tokyo Gas”). Tokyo Gas is a Japanese utility company, listed on Tokyo Stock Exchange, that supplies gas and is Japan’s largest provider of city gas, serving more than 11 million customers for over 130 years, primarily in the Tokyo metropolitan area. Tokyo Gas’s registered head office is at 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan.

The Company wholly owns and controls the following subsidiaries in Australia (“Tokyo Gas Australian Subsidiaries”) and invests in LNG projects through those subsidiaries:

- Tokyo Gas Darwin LNG Pty Ltd (which holds a 3.066% interest in the Darwin LNG Project and associated infrastructure);
- Tokyo Gas Pluto Pty Ltd (which holds a 5% interest in the Pluto LNG Project and associated infrastructure);
- Tokyo Gas Gorgon Pty Ltd (which holds a 1% interest in the Gorgon LNG Project and associated infrastructure);
- Tokyo Gas QCLNG Pty Ltd (which holds a 1.25% interest in the Queensland Curtis LNG Project and associated infrastructure);
- Tokyo Gas Ichthys Pty Ltd (which holds a 1.575% interest in the Ichthys LNG Project and associated infrastructure); and
- Tokyo Gas Ichthys F&E Pty Ltd (which holds a 1.575% interest in the Permit WA285-P).

Among the Tokyo Gas Australian Subsidiaries, Tokyo Gas Pluto Pty Ltd also qualifies as a reporting entity under the Modern Slavery Act 2018 (Cth) and is covered by this statement.

The registered address of the Company and the Tokyo Gas Australian Subsidiaries is Level 11,

Brookfield Place Tower 2, 123 St Georges, Perth WA 6000.

## **b. Process of consultation**

The Tokyo Gas Australian Subsidiaries are special purpose vehicles established for holding interests in the LNG projects and have no employees. They all operate under the direction and governance of the Company. Consultation in relation to this statement has occurred among the directors of the Company and the Tokyo Gas Australian Entities.

## **2. Our structure, operations and supply chains**

The Company's primary activities are, through the Tokyo Gas Australian Subsidiaries, investing and participating in various joint ventures that own and operate the LNG projects for the production and supply of liquefied natural gas ("LNG") and condensate for export, and the production and supply of domestic gas for sale within Australia. The Company and the Tokyo Gas Australian Subsidiaries are not operators of the projects, rather participate in the projects as minority joint venture partners.

Further details can be found in the links:

- Darwin LNG Project (<https://www.santos.com/what-we-do/five-core-assets/northern-australia-and-timor-leste/>). Darwin LNG is operated by Santos Limited and its affiliates.
- Pluto LNG Project (<https://www.woodside.com.au/what-we-do/australian-operations/pluto-lng>). Pluto LNG is operated by Woodside Burrup Pty Ltd.
- Gorgon Project (<https://australia.chevron.com/our-businesses/gorgon-project>). Gorgon Project is operated by Chevron Australia Pty Ltd.
- QCLNG Project (<https://www.shell.com.au/about-us/projects-and-locations/qgc/about-qgc.html>). QCLNG is operated by QGC Pty Limited and its affiliates.
- Ichthys LNG Project (<https://www.inpex.com.au/projects/ichthys-lng/>). Ichthys LNG is operated by INPEX Operations Australia Pty Ltd and its affiliates.

The Company employed 25 employees and out of them, 15 employees were secondees from Tokyo Gas as of 31 December 2021. All employees of the Company work at the Company's office in Perth, Western Australia.

The Company invests and participates in five LNG projects in Australia through the Tokyo Gas Australian Subsidiaries. Each project's operator manages and operates the project and deals with suppliers of products and services used in the operation of the project, including equipment,

engineering, construction, drilling, maintenance, IT and shipping. The Company monitors the operation of the projects by the operators and retains professional advisers in areas such as legal, technical, accounting and tax for such monitoring purposes.

The Company also engages suppliers for its office administration, such as purchasing office equipment, IT support services, cleaning services and other various services. Due to the nature of the Company's business, those purchases form only a minor part of the business. As stated above, the Tokyo Gas Australian Subsidiaries are special purpose vehicles, they do not engage those suppliers.

### **3. Modern slavery risks in the operations and supply chains**

The businesses of Tokyo Gas and the Tokyo Gas Australian Subsidiaries are operated in Australia and in compliance with Australia's strict laws and regulations. Our suppliers are predominantly based in Australia. Our operations and supply chains are generally considered to be at low risk of exploitation and modern slavery. However, we are aware that some industries such as cleaning sector may have higher risks of modern slavery practices and must be reviewed carefully.

### **4. Action taken to assess and address the risks**

#### **a. Implementation of Modern Slavery Framework**

The Company has implemented a Modern Slavery Framework. The Framework establishes the business organization structure and the overall processes in respect of modern slavery and human trafficking, and a workflow outlining responsibilities along with relevant leadership functions and accountability.

The Framework sets out a risk assessment procedure adopted, including supplier checks and development of a method for assessing and identifying potential risk suppliers based on international guidelines (such as Global Slavery Index), as well as a method for assessing risks in operations in conjunction with the operators. Lastly, it deals with risk mitigation actions to be taken in case of risks being identified in relation to suppliers or operations and outlines education and training to be conducted.

Recognising that the management of risk cannot be effectively addressed by one function only, a cross-functional working group has been set up. They meet regularly to review progress on an action plan, risk assessment and due diligence processes.

The working group assesses the effectiveness of the Framework on an annual basis to see if improvements may be made to the processes. The working group concluded from this financial year's assessment that the current Framework is functioning properly and does not need to be further modified.

**b. Risk Assessment in FY2021**

In FY2021, the Company analysed the risks in its operations and supply chains using the following methods.

The Company reviewed and analysed the latest Modern Slavery Statements of the operators of the projects to assess the risks in the operations: Santos Limited; Woodside Burrup Pty Ltd; Chevron Australia Pty Ltd; QGC Pty Limited; and INPEX Operations Australia Pty Ltd. The Company did not find any serious modern slavery issues which it needs to ask the operators to address or to provide more detailed information about.

The Company conducted hearings by email with 4 of 9 new suppliers who were engaged by the Company for the first time in FY2021, to assess their risks of engaging in modern slavery practices, and confirmed that they did not engage in any modern slavery practices. The other 5 new suppliers were in low-risk industries such as professional services, and therefore we did not conduct hearings.

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

**c. Risk mitigation in FY2021**

In FY 2021, in addition to our training provided to the existing employees in the previous financial year, the Company engaged external legal consultants to provide training to new employees who joined the Company in FY2021 so that they could understand the importance of addressing the modern slavery issues and identify and report modern slavery practices.

The Company has continued to further improve its Employment Policy Manual, which is made available to all employees and contractors, to better guide their conduct and to provide its business

standards. Among various guidelines and requirements provided in the Employment Policy Manual, it is required that they report any instances of suspicions of any unethical behaviours including, but not limited to, potential modern slavery issues.

## **5. Assessing the effectiveness of actions**

The Framework establishes a process for engagement between key business areas of procurement, commercial and legal via the working group, which engagement tasks include review and assessment of the Framework's effectiveness across the business at the end of each year.

The leadership also conducts year-end reviews as a part of the annual disclosure review process for this Modern Slavery Statement and its recommendations. This review is endorsed by the board of directors of the Company in assessing the appropriateness of our framework, systems, the Employment Policy Manual and the Company's performance.


## **6. Any other relevant information**

As our awareness of the issues grow, we continued to be committed to improving our process to ensure that we adapt appropriately and capture any risks as effectively as possible. A future action plan is to be prepared for the assessment of further improvements in actions in the following years.

## **7. Approval**

The board of directors of the Company has approved this statement on behalf of the Company and Tokyo Gas Pluto Pty Ltd at the board meeting held on 21 April 2022.

This statement is signed by Eiichiro Fujii his capacity as the CEO of the Company.

  
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CEO of Tokyo Gas Australia Pty Ltd