



# Modern Slavery Statement

Reporting period ending 31 December 2023

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ConocoPhillips has zero tolerance of modern slavery and human trafficking in all its different forms. This approach reflects a commitment to act ethically and responsibly in all business relationships and to ensure that modern slavery and human trafficking are not present in any part of our operations or in our supply chain.

ConocoPhillips supports and is committed to conducting its businesses in a way that is consistent with the human rights philosophy expressed in the *Universal Declaration of Human Rights*, the *United Nations Guiding Principles on Business and Human Rights* and the *International Labour Organization Declaration on Fundamental Principles and Rights at Work* and expect suppliers and contractors working on our behalf to be guided by these principles.

For further information about the organisation's responsible business practices, refer to the ConocoPhillips [Code of Business Ethics and Conduct](#).



# Reporting entities

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) by ConocoPhillips Australia Investments Pty Ltd ABN 45 636 736 199 (ConocoPhillips Australia Investments) and ConocoPhillips Australia Pacific LNG Pty Ltd ABN 99 132 823 173 (ConocoPhillips Australia Pacific LNG) (together, the reporting entities).

## Our structure

The reporting entities are each registered under the *Corporations Act 2001* (Cth) as Australian proprietary companies limited by shares. The reporting entities are part of the ConocoPhillips organisation. Headquartered in Houston, Texas, ConocoPhillips has operations and activities in 13 countries, US\$96 billion of total assets and approximately 9,900 employees as of 31 December 2023. Total company production for the year was more than 1.8 million barrels of oil equivalent per day globally. For more information, go to [www.conocophillips.com](http://www.conocophillips.com).

ConocoPhillips has been active in Australia for two decades. Its Australian operations are headquartered in Brisbane, Queensland with an office also in Gladstone, Queensland.

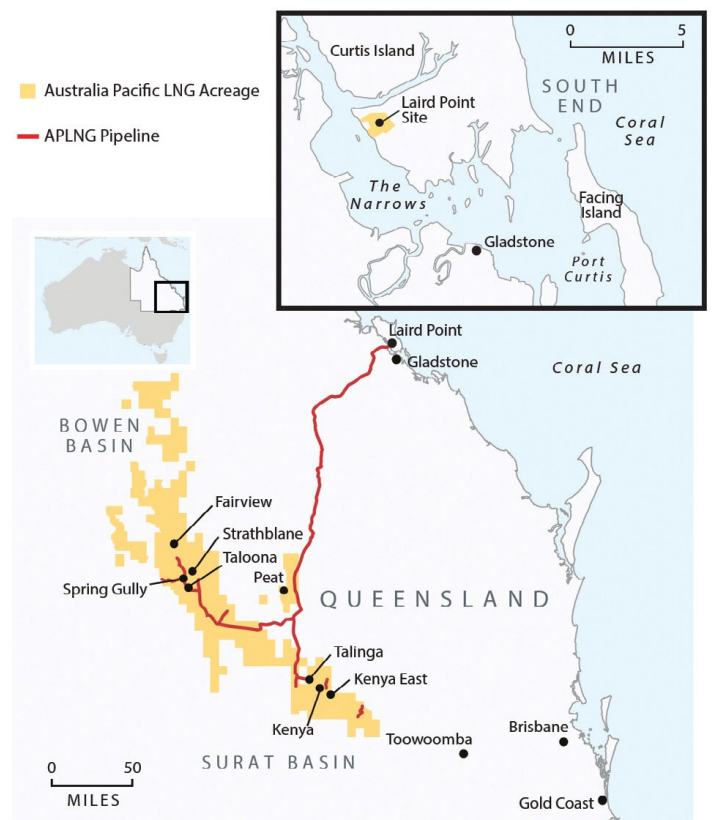
ConocoPhillips Australia Pacific LNG is a shareholder in the Australia Pacific LNG coal seam gas to liquefied natural gas (LNG) joint venture (APLNG). ConocoPhillips Australia Operations Pty Ltd ABN 28 141 253 787 (ConocoPhillips Australia) (a related entity of ConocoPhillips Australia Investments and not a reporting entity) is the operator of APLNG's liquefaction facility (APLNG Facility) on Curtis Island, near Gladstone. ConocoPhillips Australia Pacific LNG is wholly owned by ConocoPhillips Australia Investments.

## Our operations

### Overview

ConocoPhillips' principal Australian operations in 2023 comprised:

- 47.5% interest in APLNG and downstream operator of the APLNG Facility.
- Exploration for natural gas.
- LNG marketing activities.
- Commercial and corporate functions including operations, HSE, supply chain, quality engineering, maintenance, shutdown, marine, security, finance, information technology, human resources, legal and government and external affairs.





## Australia Pacific LNG

Australia Pacific LNG Pty Limited (APLNG) is an incorporated joint venture between ConocoPhillips Australia Pacific LNG (47.5%), Origin Energy Limited (27.5%), and Sinopec Australia Pacific LNG Pty Limited (25%). APLNG is the largest producer of natural gas in eastern Australia, supplying Australian customers with natural gas and international customers with LNG. Each year APLNG supplies approximately 30% of the east coast domestic gas market.

A subsidiary of Origin Energy Limited operates APLNG's gas fields, upstream exploration, production and pipeline system while ConocoPhillips Australia operates the downstream APLNG Facility and undertakes LNG marketing for the APLNG Project. The APLNG Facility uses ConocoPhillips' proprietary Optimized Cascade® technology to liquefy natural gas before it is exported to customers in Asia and comprises two gas liquefaction trains, LNG storage tanks, a loading jetty, an operational control center and associated infrastructure. APLNG has two long-term offtake agreements in place for the supply of LNG with China Petroleum & Chemical Corporation and the Kansai Electric Power Co. Inc. of Japan.



APLNG is committed to maintaining the highest standards in respect of the operation of its gas fields, gas pipelines and the APLNG Facility. Considerations include safety, community engagement and sustainable practices.

## Our supply chain

Supply chain management is integral to the operation of the APLNG Facility and delivers significant value through an integrated and collaborative approach to business planning and use of supply chain practices.

ConocoPhillips has an unwavering focus on safety, quality and sustainability in the selection and management of our suppliers and contractors. We strive for continuous improvement by developing rigorous sourcing and contracting strategies, having consistent and reliable supply chain standards, and developing mutually beneficial partnerships with our suppliers and contractors. We regularly engage our suppliers through business reviews, supplier relationship management collaboration and supplier audits.

ConocoPhillips is also committed to maximising Australian local content and the engagement of Indigenous peoples wherever possible through our own operations and through our supply chain.

The types of goods and services sourced by ConocoPhillips Australia from direct or indirect suppliers and contractors include:

- Engineering equipment and services.
- Maintenance services and spares.
- Ferry and barge services.

- Freight forwarding.
- Utilities and waste management services.
- Refrigerants and industrial gases.
- Workers' accommodation.
- IT equipment, software, and services.
- Storage services.
- Labour and corporate services.
- Cleaning and catering services.
- Exploration services.
- Consulting services.

In 2023, ConocoPhillips Australia had approximately 255 active contracts and approximately 96.8% of our total annual spend on goods and services was with Australian suppliers and contractors. Furthermore, approximately 90% of all our suppliers and contractors are Australia based. The remaining suppliers and contractors with an annual spend of over \$1 million are located in Great Britain and the United States of America.

# Modern slavery risks in operations and supply chain

ConocoPhillips considers the risk of modern slavery in our Australian operations and supply chain to be relatively low due to their geographical location. In addition, construction of the APLNG Facility has been completed for several years resulting in a considerably reduced annual spend on goods and services. The majority of our suppliers and contractors are Australian-based and relatively few goods and materials are currently directly sourced from countries reported to have high prevalence of modern slavery by international organisations or NGOs.

However, while we consider the risks of modern slavery in our operations and supply chain to be relatively low, an internal risk assessment tool was developed in 2020 to identify potential exposure. This tool is used to assess risks by considering elements such as the country in which goods are manufactured or services provided, the particular industry sector, the length and nature of the ongoing relationship with the supplier, annual spend with the supplier as well as reviews of publicly available information such as media reports and self-reported material. As a result of undertaking this risk assessment, certain goods and services in ConocoPhillips Australia's supply chain were identified as potentially having a higher modern slavery risk than others, for example, the manufacture of components such as valves, gaskets and fasteners by subcontractors of our suppliers in countries in the Asia Pacific region which are considered higher risk

due to socio-economic factors such as poverty or a poor human rights track record. Information provided in the [Global Slavery Index](#) and the [Freedom House List](#) were used to assess higher-risk countries. In addition, cleaning and catering services and the provision of direct hire labour, each of which may involve low wages and manual labour, were assessed as potentially having modern slavery risks.

A further area assessed was the LNG vessels used by APLNG's LNG off-takers and the relatively few vessels chartered by ConocoPhillips Australia for delivery at terminal spot cargos, as seafarers may be from high-risk jurisdictions. This is an area in which ConocoPhillips has rigorous, well-established ship vetting and inspection protocols that ensure the requirements of the Maritime Labour Convention 2006 are met. Although ConocoPhillips Australia does not directly engage seafarers, by working collaboratively with reputable vessel owners and operators, we ensure these statutory rights are upheld. The vessels are also under the jurisdiction of, and are audited periodically by, the Australian Maritime Safety Authority when they load at the Port of Gladstone.

Following completion of the risk assessment, key suppliers were identified, and due diligence was subsequently undertaken on their operations, supply chain and approach to managing modern slavery risks.





# Actions taken to assess and address modern slavery risks

## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

ConocoPhillips conducts all contracting and procurement activities in an ethical manner in accordance with our Supply Chain Standard and applicable laws. We require suppliers to comply with certain requirements as a condition of business and to be guided by the principles and standards set forth in the ConocoPhillips [Code of Business Ethics and Conduct](#) and their own ethics and conduct policies. We have developed the [ConocoPhillips Supplier Expectations](#) to provide additional clarity to our suppliers regarding our expectations in this area, including conducting business consistent with our [Human Rights Position](#). This position reflects internationally recognised standards such as the *Universal Declaration of Human Rights*, the *United Nations Guiding Principles on Business and Human Rights*, and the *International Labour Organization Declaration on Fundamental Principles and Rights at Work*.

Since the introduction of the *Modern Slavery Act 2018* (Cth), ConocoPhillips has increased its focus on modern slavery within its Australian operations and supply chain. During 2023, we undertook further actions (or continued actions) in order to assess and address modern slavery risks. These actions included:

- Continuing regular meetings of our internal modern slavery working group comprising representatives from a number of functions to assess and address modern slavery risks in our operations and supply chain.
- Participating in modern slavery collaboration sessions with representatives of APLNG and Origin Energy Limited to collaborate on assessing and addressing modern slavery risks in APLNG's upstream and downstream operations and supply chain.
- Delivering a program of modern slavery training to end users of key contracts across different functions to raise awareness of modern slavery and steps that end users can take to identify and mitigate those risks when dealing with suppliers.
- Delivering modern slavery training induction modules to all new employees to raise awareness of high-risk industries, products and services.
- Using our risk assessment tool to identify modern slavery risks using indicators such as the country in which the supplier operates, the supplier's industry sector, the nature of the supplier's operations or services and its supply chain as well as its relationship with the relevant reporting entity.

- Embedding the modern slavery vendor questionnaire into our Vendor Management System, to assist in determining what risks ConocoPhillips Australia may need to manage throughout the contract.
- Subsequently evaluating the responses to the vendor questionnaire — to date, no material risks of modern slavery have been identified.
- Conducting an internal assurance audit of the ConocoPhillips Australia modern slavery process controls established to date to ascertain current compliance and identify supporting management system improvement opportunities.
- Ensuring that ConocoPhillips Australia's standard contract terms and invitations to tender, which incorporate provisions with respect to compliance with applicable human trafficking and modern slavery laws, are used in respect of any newly contracted contractor or supplier.
- Participating in the Human Rights Resources and Energy Collaborative, a forum for practitioners working in the resources and energy sectors to network and share knowledge on respect for human rights, including the implementation of the *Modern Slavery Act 2018* (Cth).
- Ensuring ConocoPhillips' ethics reporting framework and policies are accessible and that ethics issues or grievances can be reported confidentially and without fear of reprisal. This reporting framework allows us to investigate potential issues, take action where necessary and prevent future issues. Should any incident of potential or actual modern slavery be reported, we are committed to working with our suppliers and external stakeholders to investigate the incident and respond appropriately to remediate the impact. No incidents of modern slavery were reported through ConocoPhillips' ethics reporting framework or under ConocoPhillips Australia's whistleblowing policy in 2023.

We are committed to a process of continuous improvement in our modern slavery response and to this end, have identified a number of actions we intend to undertake in future reporting periods to assess and address modern slavery risks. For example, we are committed to continue rolling out training for end users of key contracts in 2024. Modern slavery risk management will continue to be further embedded in our current risk management and assurance processes and procedures in 2024 and beyond.

# Assessing the effectiveness of our actions

ConocoPhillips understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery in its operations and supply chain over the long term. ConocoPhillips Australia currently utilises its internal risk management and assurance processes for reporting actual or suspected ethics concerns to assess the effectiveness of the actions being taken, including in relation to the risk of modern slavery in our operations and supply chain.

Our key focus areas for 2024 and beyond are to:

- Develop and implement a modern slavery assurance manual to formalise the assurance framework utilised in order to minimise the risk of modern slavery occurring within ConocoPhillips Australia and its engaged supply chain.
- Collaborate with our global supply chain team to support the evaluation and selection process of a ConocoPhillips preferred third party risk monitoring provider to bolster the ConocoPhillips Australia's modern slavery risk assessment processes.
- Conduct supplier assessment reviews and coordinate with suppliers to remedy any potential or actual findings.
- Conduct periodic checks of our risk management and assurance processes to validate their effectiveness and amend or update these processes as necessary.
- Benchmark our actions against the actions taken by other companies in the industry.
- Assess labour rights training options to evaluate what additional information is available to continue to develop ConocoPhillips Australia's human rights training and awareness content.
- Share our knowledge, insights, and best practices on establishing modern slavery protocols with our global business unit partners to promote a culture of human rights learning and improvement in all regions that we work in to improve our ability to identify, prevent, and respond to modern slavery risks.
- Continue to increase awareness of our ethics reporting hotline.

It is recognised that the nature of the risk of modern slavery may change over time and ongoing adaption will be required.

## Consultation and approval

The reporting entities consulted with ConocoPhillips Australia in the development of this statement. In particular, the consultation involved review of the statement by ConocoPhillips Australia management personnel across the reporting entities and board members.

This statement has been approved by the Board of ConocoPhillips Australia Investments and by the Board of ConocoPhillips Australia Pacific LNG. A new statement will be published each year on the corporate website [www.conocophillips.com.au](http://www.conocophillips.com.au).



**Jan-Arne Johansen**  
President, Australia

for and on behalf of ConocoPhillips Australia Investments Pty Ltd and ConocoPhillips Australia Pacific LNG Pty Ltd

26 June 2024

