Modern Slavery Statement 2025

Osaka Gas Australia Pty Ltd and controlled entities
Reporting period: Financial year ended 31 December 2025

1. Introduction

This is the Modern Slavery Statement (**Statement**) made by Osaka Gas Australia Pty Ltd (OGA) and the entities it owns or controls as listed in this statement, in accordance with the Modern Slavery Act 2018 (Cth) (**MSA**).

This Statement describes the steps taken by OGA and the entities it owns or controls during the financial year ended 31 December 2025 to identify, assess and address the risks of modern slavery practices in our operations and supply chains.

For the purpose of this Statement, "modern slavery" includes conduct that would constitute slavery, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services, trafficking in persons, and the worst forms of child labour.

2. Mandatory Reporting Criteria Index

Mandatory criterion	Where addressed
Identify the reporting entity	Sections 1 and 3
Describe structure, operations and supply chains	Sections 3 and 4
Describe modern slavery risks	Section 5
Describe actions taken to assess and address risks, including due diligence and remediation	Sections 6 and 7
Describe how effectiveness is assessed	Section 8
Describe consultation with owned or controlled entities	Section 9
Any other relevant information	Section 10

3. About OGA and Entities Covered by this Statement

OGA is a wholly owned subsidiary of Osaka Gas Co., Ltd. (OG), the main provider of city gas to the majority of the Kansai region in Japan, and a member of Daigas Group (DGG), which is formerly known as the Osaka Gas Group.

OGA was established in 2000 to expand DGG's business in Australia, particularly in the upstream oil and gas sector. OGA has invested in upstream energy projects as a joint venture participant with the objective of supporting long-term stable LNG supply and contributing to the global business growth of the DGG.

OGA also continues to consider and develop opportunities that support the DGG's carbon neutrality objectives, including opportunities relating to decarbonisation, e-methane, renewable energy, hydrogen and carbon credit.

This Statement covers OGA and the entities it owned or controlled during the reporting period.

During the reporting period, Osaka Gas Energy Oceania Pty Ltd (OGEO) became part of OGA through an OG reorganisation on 1 April 2025. Accordingly, OGEO is included in this Statement for the period from 1 April 2025 to 31 December 2025.

Entity	Description / Asset Interest
Osaka Gas Sunrise (PSC19) Pty Ltd	Interest in Sunrise upstream gas asset
Osaka Gas Sunrise (PSC20) Pty Ltd	Interest in Sunrise upstream gas asset
Osaka Gas Gorgon Pty Ltd	Interest in Gorgon upstream gas and LNG liquefaction plant
Osaka Gas Ichthys Pty Ltd	Interest in Osaka Gas Ichthys Development and Cash Maple Development
Osaka Gas Ichthys Development Pty Ltd	Interest in Ichthys upstream gas asset and ILNG Pty Ltd
Osaka Gas Energy Oceania Pty Ltd	Interest in mid to downstream energy assets, renewables, and decarbonisation investments. Became part of OGA through an OG reorganisation on 1 April 2025; included in this Statement for the period from 1 April 2025 to 31 December 2025.

Most of OGA's controlled entities are special purpose vehicles established to hold interests in energy assets. They do not have employees and are operated under the direction and governance of OGA and OG.

OGA has considered OGEO's activities, contracts, suppliers, operations and governance arrangements for the period from 1 April 2025 to 31 December 2025 as part of preparing this Statement.

4. Our Operations and Supply Chains

OGA's office is located in Perth CBD, Western Australia. OGA's primary activities include:

- managing non-operated interests in upstream energy and LNG assets;
- monitoring and supporting joint venture matters;
- identifying and assessing new investment and business development opportunities;
- undertaking corporate, finance, HR, IT, compliance and administrative activities;
- liaising with OG, other DGG entities, project partners, professional advisers and service providers.

As on 31 December 2025, OGA and the entities it owns or controls held interests in the following assets/projects during the reporting period:

Asset/Project	Type	Share	Owned by	Status during reporting period
Sunrise	Upstream gas	10.00%	Osaka Gas Sunrise (PSC19) Pty Ltd / Osaka Gas Sunrise (PSC20) Pty Ltd	Held during 2025
Gorgon	Upstream gas and LNG liquefaction plant	1.25%	Osaka Gas Gorgon Pty Ltd	Held during 2025
Ichthys	Upstream gas and LNG liquefaction plant	1.20%	Osaka Gas Ichthys Pty Ltd / Osaka Gas Ichthys Development Pty Ltd	Held during 2025
Cash Maple	Upstream gas	1.2%	Osaka Gas Ichthys Pty Ltd	Acquired on 2 May 2025
Qalhat LNG	LNG liquefaction plant and sales	3.00%	Osaka Gas Australia Pty Ltd	Held during 2025; sold on 30 December 2025
Telfer	Gas pipeline	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Nifty	Gas pipeline	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Wickham Point	Gas pipeline	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Bonaparte	Gas pipeline	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Murraylink	Electricity inter-connector	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Directlink	Electricity inter-connector	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Kogan North	Gas processing	30.20%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025

Asset/Project	Type	Share	Owned by	Status during reporting period
North Brown Hill	IPP (wind farm)	39.90%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
AI Carbon	Carbon credit	11.98%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Burdekin Genesis	Renewables and BESS development	50.00%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Narrabri Genesis	Renewables and BESS development	50.00%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025
Forbes Genesis	Renewables and BESS development	50.00%	Osaka Gas Energy Oceania Pty Ltd	Held during 2025; included in this Statement from 1 April 2025

During the reporting period, OGA held a 3% interest in Qalhat LNG, an LNG liquefaction and sales project in Oman. OGA's interest in Qalhat LNG was sold on 30 December 2025. Accordingly, Qalhat LNG is included in this Statement only for the period during which OGA held the interest in the reporting year.

During the reporting period, OGI acquired a 1.2% interest in the Cash Maple upstream gas development on 2 May 2025. Accordingly, Cash Maple is included in this Statement only for the period during which OGI held the interest in the reporting period.

OGA is not the operator of these assets and does not directly manage project-level procurement, employment or contractor arrangements. However, OGA recognises that modern slavery risks may exist in the broader operations and supply networks of large-scale energy projects and seeks to use its available influence as a joint venture participant.

OGA's direct supply chains are primarily associated with professional and office-based services, including:

- legal, tax, accounting, payroll, insurance and advisory services;
- IT systems, hardware, software and cybersecurity support;
- office leasing, facilities management, cleaning, maintenance and building services;
- recruitment, migration, relocation and travel-related services;
- office equipment, furniture, consumables and corporate merchandise;

- consulting, legal and technical advisory services for existing assets and potential new business opportunities.

5. Modern Slavery Risks in Our Operations and Supply Chains

OGA considers that the risk of modern slavery in its direct workforce, and in the direct contractor arrangements of OGA and relevant controlled entities, is relatively low due to the nature of the relevant office-based and professional operations, small workforce, and HR, compliance and governance controls.

However, OGA recognises that modern slavery risks may exist in its broader operations and supply chains. OGA therefore considers modern slavery risk by reference to the nature of the activity, country or sector risk, labour intensity, subcontracting arrangements, supplier visibility, and OGA's level of control or influence.

5.1 Direct operations and workforce

OGA's direct operations are primarily office-based and professional in nature. Its workforce is employed under Australian employment arrangements and supported by HR, compliance, governance and workplace policies.

In addition to OGA, Osaka Gas Gorgon Pty Ltd (OGG), Osaka Gas Ichthys Pty Ltd (OGI) and Osaka Gas Ichthys Development Pty Ltd (OGID), as controlled entities covered by this Statement, have also engaged contractors in connection with their activities. These arrangements are generally professional, technical, advisory or project-related in nature and are managed through OGA's governance, contract management, compliance and oversight processes, as applicable.

Potential risk factors in the direct operations of OGA, OGG, OGI and OGID may include:

- reliance on contractors, secondees or externally engaged personnel;
- technical, advisory or project-related contractor engagements;
- migration, relocation or expatriate support arrangements;
- outsourced services used to support office operations;
- the need to ensure employees and contractors understand reporting channels and expected standards of conduct; and
- reduced visibility where contractors or service providers use subcontractors or offshore support teams.

OGA assesses the risk of modern slavery in its direct workforce and in the direct contractor arrangements of OGA, OGG, OGI and OGID as relatively low, having regard to the professional nature of the work, the Australian operating context, and the governance and compliance controls in place. However, OGA recognises that contractor and outsourced service arrangements can present modern slavery risks if not appropriately managed. OGA therefore continues to manage these risks through HR controls, workplace policies, training, compliance oversight and reporting channels.

5.2 Non-operated joint venture assets

OGA and its controlled entities hold minority, non-operated interests in large-scale energy assets. OGA and its controlled entities do not operate these assets and do not directly control project-level procurement, contractor engagement, employment practices or supply chain management undertaken by the relevant project operators.

This is distinct from any direct contractor engagements entered into by OGA, OGG, OGI and OGID for corporate, professional, technical, advisory or project-support purposes, which are considered in Section 5.1.

Modern slavery risks may arise in connection with:

- construction, maintenance and shutdown activities;
- labour hire and subcontracted workforces;
- marine, logistics and transport services;
- security, cleaning, catering and facilities services;
- equipment, materials and goods procured through global supply chains;
- activities in jurisdictions where labour protections, migrant worker protections or enforcement mechanisms may differ.

OGA's level of control or influence varies depending on the relevant joint venture arrangements, ownership percentage, operator processes and governance rights.

5.3 Overseas asset exposure

During the reporting period, OGA held an interest in Qalhat LNG in Oman. OGA recognises that overseas assets may involve different labour markets, legal frameworks, subcontracting models and migrant worker arrangements.

Although OGA did not operate Qalhat LNG and sold its interest on **30 December 2025**, OGA considered overseas jurisdictional risks as part of its modern slavery risk assessment for the period during which the interest was held.

5.4 Direct suppliers and office-related services

OGA's direct supplier base is largely composed of professional service providers and office-based support services. While many of these suppliers are considered lower risk, certain categories may carry higher inherent modern slavery risk due to labour intensity, subcontracting, low-margin service delivery or global manufacturing supply chains.

Higher-risk supplier categories may include:

Supplier category	Potential risk factor
Cleaning and facilities services	Labour-intensive work, subcontracting and lower-margin service delivery
Building maintenance and security services	Contractor and subcontractor labour arrangements
IT hardware and electronic equipment	Global manufacturing and component supply chain risk
Office furniture, consumables and corporate merchandise	Offshore manufacturing and raw material supply chains
Travel, accommodation and hospitality services	Service-sector labour risk
Relocation, migration and recruitment-related services	Potential migrant worker vulnerability and recruitment-related risks
Suppliers using offshore support teams or subcontractors	Reduced visibility over labour practices beyond the direct supplier

5.5 Osaka Gas Energy Oceania Pty Ltd

OGA considered the modern slavery risk profile of **Osaka Gas Energy Oceania Pty Ltd**, which became part of OGA through head office reorganisation on **1 April 2025**.

OGA assessed OGEO's activities for the period from **1 April 2025 to 31 December 2025**, including whether OGEO had employees, direct suppliers, service providers, contracts or business activities that could give rise to modern slavery risks.

During the period for the period it was included in this Statement, OGEO did not have employees and did not conduct independent operations.

5.6 New business and decarbonisation-related activities

OGA continues to consider opportunities in decarbonisation and new energy-related areas, including e-methane, hydrogen, ammonia, renewable energy and carbon credits.

OGA recognises that emerging energy transition supply chains may involve modern slavery risks associated with:

- construction and project development activities;
- engineering, procurement and construction contractors;
- solar panels, batteries, electronics and other manufactured equipment;
- critical minerals and raw materials;
- shipping, logistics and offshore manufacturing;
- suppliers operating in higher-risk jurisdictions or sectors.

Where OGA assesses new business opportunities, modern slavery and human rights risks are considered as part of the broader due diligence and risk review process.

6. Actions Taken to Assess and Address Modern Slavery Risks

During the reporting period, OGA took actions to assess and address modern slavery risks in a manner proportionate to its size, structure, role as a non-operator, and the nature of its supply chains.

6.1 Governance and policy framework

OGA operates within the governance and compliance framework of the DGG. Relevant policies and frameworks include:

Policy / framework	Relevance to modern slavery risk management
Daigas Group Code of Business Conduct	Sets expectations for lawful, ethical and responsible business conduct across the group
Daigas Group Human Rights Policy	Confirms the group's commitment to respecting human rights in accordance with international standards
Daigas Group Procurement Policy for Suppliers	Sets expectations for suppliers, including compliance with laws, occupational health and safety, respect for human rights, and prohibition of forced labour and child labour
OGA Code of Conduct	Sets behavioural and compliance expectations for OGA executives and employees
OGA Whistleblower Policy	Provides a mechanism for reporting wrongdoing without fear of reprisal, victimisation or disadvantage
G-RIMS risk management process	Supports annual identification, assessment and management of business and compliance risks

OGA's approach to compliance is based on lawful and ethical corporate conduct, supported by the Daigas Group Code of Business Conduct, OGA's internal policies, and management oversight.

6.2 Training and awareness

OGA provides compliance training to executives and employees, including training relevant to modern slavery, human rights, ethical conduct and reporting obligations.

During the reporting period, OGA continued to promote awareness of modern slavery risks through internal compliance activities and by reinforcing the importance of ethical conduct, lawful procurement and reporting concerns.

During 2025, 100% of employees completed their annual compliance training that included modern slavery awareness.

6.3 Supplier and contract management

OGA's supplier base is reviewed having regard to the nature of the goods or services provided, the location of the supplier, the degree of subcontracting, labour intensity and any known sector or product risks.

During the reporting period, OGA took steps to manage supplier-related risks by:

- applying group procurement expectations to supplier engagement;
- considering supplier reputation and compliance standing as part of onboarding or renewal;

- including appropriate compliance, legal and ethical obligations in contracts where relevant;
- escalating supplier concerns to responsible managers, compliance, legal or senior management where appropriate;
- focusing additional attention on suppliers in higher-risk categories.

6.4 Non-operated joint venture monitoring

Because OGA is not the operator of its energy assets, OGA does not directly control project procurement or workforce arrangements. However, OGA seeks to understand and monitor modern slavery and human rights risk management by project operators through available governance and public reporting channels.

During the reporting period, OGA reviewed the modern slavery statements and sustainability reports of operators and relevant project participants for its non-operated assets, including Chevron, INPEX and Woodside, where applicable and available. These reviews related to OGA's interests in assets and projects including Gorgon, Ichthys, Cash Maple, from the date of acquisition, and Sunrise. OGA also considered whether any modern slavery-related issues had been raised through joint venture governance channels.

6.5 New investment and business opportunity due diligence

When OGA identifies or assesses new market opportunities, the relevant investment ideas are screened through OG due diligence and approval processes.

Modern slavery and human rights considerations may be considered as part of broader legal, compliance, sustainability, country, counterparty and supply chain risk assessments. This is particularly relevant for new energy and decarbonisation opportunities involving new technologies, commodities, contractors, geographies or supply chains.

7. Due Diligence and Remediation

OGA's modern slavery due diligence approach is proportionate to its size, structure, role as a non-operator, and the nature of its supplier base.

OGA's due diligence approach includes:

- identifying higher-risk supplier and activity categories;
- reviewing relevant supplier, operator and counterparty information where available;
- considering modern slavery and human rights risks in new business opportunity assessments;
- maintaining internal reporting and whistleblower channels;
- escalating concerns to management and, where appropriate, the Board and OG;
- using available influence with suppliers, counterparties or joint venture partners to seek further information or corrective action where appropriate.

If OGA identifies a potential modern slavery issue, OGA's response would be guided by the nature and severity of the issue, OGA's connection to the issue, and OGA's ability to influence the relevant supplier, counterparty or operator.

Potential remediation actions may include:

- seeking further information from the supplier, counterparty or operator;
- requiring corrective action or an improvement plan;
- engaging with the relevant party to support worker-centred remediation;
- escalating the issue through contractual, governance or joint venture channels;
- suspending or terminating the relationship where appropriate and legally permissible;
- reporting the matter to relevant authorities where required.

During the reporting period, OGA did not identify any confirmed instances of modern slavery in its operations or supply chains.

8. Assessing Effectiveness

OGA assesses the effectiveness of its actions through its governance, compliance and risk management processes.

During the reporting period, OGA assessed effectiveness by considering:

- completion of relevant employee compliance training;
- outcomes of the G-RIMS annual risk assessment process;
- whether any modern slavery-related concerns were raised through internal reporting or whistleblower channels;
- review of available operator modern slavery statements and public disclosures;
- review of supplier or counterparty concerns identified during procurement, contract management or due diligence;
- internal management and Board review of this Statement.

OGA will continue to improve how it measures effectiveness. Potential future indicators include:

- number or percentage of higher-risk suppliers reviewed;
- percentage of material supplier contracts containing modern slavery or human rights clauses;
- number of operator statements or sustainability reports reviewed;
- number of employees completing relevant training;
- number of concerns raised, investigated and remediated;
- progress against improvement actions identified in annual risk reviews.

9. Consultation with Owned and Controlled Entities

OGA consulted with the directors and responsible officers of each controlled entity covered by this Statement.

For the special purpose entities that hold interests in assets and/or projects, consultation focused on confirming each entity's structure, asset interests, governance arrangements, absence of employees, and any modern slavery risks or actions relevant to the reporting period, including any direct contractor engagements entered into by those entities.

For OGEO, which became part of OGA through head office reorganisation on 1 April 2025, consultation focused on confirming its activities, contracts, suppliers, employees, governance arrangements and any modern slavery risks relevant to the period from 1 April 2025 to 31 December 2025.

The consultation process also considered whether any modern slavery-related concerns had been identified through OGA's governance, compliance, risk management or reporting processes during the reporting period.

10. Looking Ahead

OGA recognises that modern slavery risk management is an ongoing process. In the next reporting period, OGA intends to continue improving its approach by:

- strengthening documentation of modern slavery risk assessment for direct suppliers;
- improving identification of higher-risk supplier categories;
- reviewing modern slavery clauses for material or higher-risk supplier contracts;
- continuing to review operator statements and public disclosures for non-operated assets;
- incorporating modern slavery considerations into new business and decarbonisation project due diligence;
- improving effectiveness measures for future statements;
- monitoring Australian Modern Slavery Act reform.

Following the sale of OGA's interest in Qalhat LNG on **30 December 2025**, OGA's modern slavery risk profile will no longer include this overseas LNG asset from the 2026 reporting period, unless OGA acquires or participates in other overseas assets or projects.

OGA notes that the Australian Government has considered reforms to strengthen the Modern Slavery Act, including possible changes relating to penalties, reporting criteria and due diligence systems. OGA will monitor these developments and update its approach as required. The Attorney-General's Department states that modern slavery statements must set out actions taken to assess and address risks in operations and supply chains.

11. Approval and Signature

This Statement was approved by the Board of Osaka Gas Australia Pty Ltd on 23 June 2026.

As Osaka Gas Gorgon Pty Ltd also met the reporting threshold under the Modern Slavery Act 2018 (Cth) for the reporting period, this Statement was also approved by the Board of Osaka Gas Gorgon Pty Ltd on 24 June 2026, to the extent it relates to Osaka Gas Gorgon Pty Ltd and the entities covered by this Statement.

The other controlled entities covered by this Statement did not separately meet the reporting threshold under the Modern Slavery Act 2018 (Cth) for the reporting period. However, they were consulted as part of the preparation of this Statement, as described in Section 9.

Signed by a responsible member of Osaka Gas Australia Pty Ltd:

平林 幹由

Motoyuki Hirabayashi
Managing Director
Osaka Gas Australia Pty Ltd
Date: 25 June 2026