



PE WHEATSTONE PTY LTD

Modern Slavery Statement 2023

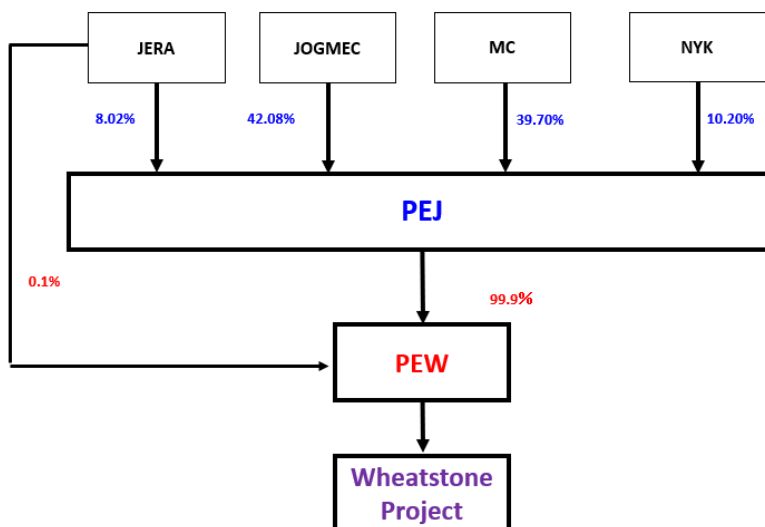
This is the third statement made by PE Wheatstone Pty Ltd (**PEW**) in accordance with the *Modern Slavery Act 2018* (Cth) and sets out the steps taken by PEW during its financial year ending 31 December 2023 to mitigate the risk of slavery and human trafficking taking place in our business or our supply chains.

We are committed to comply with Australia’s Modern Slavery law and to understand the human rights risks, and to take action to address such risks not only in our business, but also in our supply chains.

1. Reporting Entity

PEW is a private company limited by shares incorporated in Australia. PEW’s shareholders jointly own the company, they comprise:

- Pan Pacific Energy K.K. (PEJ 99.9%) (an incorporated joint venture between: Mitsubishi Corporation (MC 39.7%), Nippon Yusen Kaisha (NYK 10.20%), JERA Co.,Inc. (JERA 8.02%) and Japan Organisation for Metals and Energy Security (JOGMEC 42.08%)); and
- JERA CO., Inc. (0.1%)



PEW has no entities that we own or control, and no joint statement has been (or will be) submitted.

PEW's principal place of business is in Western Australia with its office located at Level 36 QV1, 250 St Georges Terrace in Perth, while the registered office is at Level 12, 680 George Street in Sydney.

The primary activities of PEW are the investment and participation in the joint ventures that own and operate the Wheatstone LNG Project for the production and supply of liquefied natural gas and condensate for export, and the production and supply of domestic gas for sale within Western Australia. Further details are here: <https://australia.chevron.com/our-businesses/wheatstone-project>

The joint ventures are operated by Chevron Corporation, and the other partners are KUFPEC, Woodside Energy and Kyushu Electric Power Company.

2. Our supply chain

PEW deals with the export of liquified natural gas and condensate and with suppliers in our industry in the general course of business, including shipping and insurance and it retains professional advisers in areas such as legal, technical, accounting and tax. PEW purchases information technology equipment and office supplies and services. Due to the nature of our business, purchases form only a minor part of our business.

3. Actions taken to assess and address the risks

a. Implementation of Modern Slavery Framework

PEW introduced and implemented a Modern Slavery Framework in 2020 (Framework). The Framework establishes the business organisation 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 the Global Slavery Index), as well as a method for assessing risks in operations in conjunction with the operators by direct enquiries. Lastly it deals with risk mitigation actions to be taken in case of risks being identified in relation to suppliers or operations by directly contacting suppliers or operator for discussion, and outlines internal 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. The working group meets regularly to review progress on an action plan, risk assessment and mitigation, and propose future actions.

The effectiveness of the Framework is reviewed and assessed at year-end by leadership and the Board of directors. The Framework was last reviewed in December 2023 and it was determined that it is still fit for purpose.

b. Risk Assessment in FY2023

Assessment of suppliers in FY2023

In accordance with our Modern Slavery Framework, we have assessed our suppliers in FY2023 including new suppliers. The assessment focuses on the country of origin as well as nature of the services.

In respect to the new suppliers, we have focused on a cargo surveyor located in Korea, and a port terminal server located in Japan. As part of our assessment we confirmed the existence of their corporate ethical policies and reviewed their Modern Slavery Statements previously submitted. Based on our assessment, we concluded that the risks of modern slavery in their supply chains are low.

Assessment of the rest of the suppliers indicated that there is a very low risk of modern slavery in our supply chains.

c. Risk Mitigation in FY2023

Annual training has been conducted on modern slavery screening and supplier due diligence for staff responsible for supplier checks, vendor engagement and purchasing decisions.

While recognising that PEW has limited ability to influence major project supply chains or engage with operator's suppliers, as PEW is not an operator, we actively participate in and keep informed on the engagement of suppliers relating to the project, where possible.

Shareholders, directors, and the leadership team have received Modern Slavery information and an annual modern slavery awareness session has been completed for all staff.

Our Employment Policies Manual guide how we do business and shape the standards we set for our staff and others and the way we behave. It includes policies to support equal opportunities, and against bullying and harassment. Additionally, PEW has a whistle blower policy that is available to all employees and contractors, to report any instances or suspicions of unethical behaviour.

4. Assessing the effectiveness of actions

The implemented 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 our business at the end of each year.

The leadership also conducted year-end reviews as a part of the annual disclosure review process for this Modern Slavery Statement and on its recommendation, this review is endorsed by our Board in assessing the appropriateness of our frameworks, systems, the Employment Policies Manual and PEW's performance.

5. Any other relevant information

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

6. Process

The Board of directors of PEW has approved this Statement at its meeting on 24th June 2024.



Gaku Takagi
Managing Director
PE Wheatstone Pty Ltd