



13/06/2025

# Modern Slavery Statement

This is Tri-Star's third Modern Slavery Statement, in accordance with the Modern Slavery Act 2018 (Cth), covering the 1 January to 31 December 2024 reporting period.



# Contents

Reporting entity	2
Our structure, operations, and supply chains	3
Structure and operations	3
Business	3
Workforce	4
Traditional Owners	5
Supply chains	5
Modern slavery risks	6
Addressing modern slavery risks	6
Actions taken by Tri-Star within reporting period	6
Actions planned to address modern slavery risks in the next reporting period	6
Effectiveness	7
Assessing effectiveness	7
Process of consultation	7
Approval	8

## Reporting entity

This Modern Slavery Statement (**Statement**) made by Tri-Star E&P Pty Ltd (ABN 79 629 728 605) and its subsidiary entities (**Tri-Star**) is prepared as required by the *Modern Slavery Act 2018* (Cth) (**the Act**).

Tri-Star E&P Pty Ltd is an Australian entity with a consolidated revenue that exceeded \$100 million during the reporting period 1 January 2024 to 31 December 2024 (**Reporting Period**).

Tri-Star is a family-owned resources exploration & production group, building on three generations of geological and technical experience. Tri-Star's Australian operations are focused on resources exploration and the unlocking of new energy sources of oil, gas, and minerals. We are committed to acting ethically in all our operations and business dealings and to putting controls in places to prevent modern slavery risks in our supply chains.

This is the third Modern Slavery Statement submitted by Tri-Star addressing the mandatory reporting criteria set out by the Act. This statement outlines our progress to date with respect to identifying any risks of modern slavery in our operations and supply chain during this reporting period, and assesses our approach to addressing these risks, including reviewing activities that are currently underway and actions we have planned for subsequent reporting periods.

As at 31 December 2024, Tri-Star's Australian operations included the following wholly owned subsidiary entities:

- Tri-Star Admin Pty Ltd
- Tri-Star Saxony Ore Pty Ltd
- Tri-Star Minerals Pty Ltd
- Tri-Star Gold Pty Ltd
- Tri-Star Exploration Pty Ltd
- Tri-Star OPCO Pty Ltd
- Tri-Star Group Investments Pty Ltd
- Tri-Star Stonecroft Pty Ltd
- LNG Queensland Pty Ltd
- Tri-Star Fairfields Pty Ltd
- Tri-Star Royalty Company Pty Ltd
- Tri-Star Nightingale Pty Ltd
- Tri-Star Gilbert Pty Ltd
- Tri-Star Plowden Pty Ltd
- Tri-Star Simpson Pty Ltd
- Sapex Pty Limited
- Gladstone LNG Pty Ltd
- Tri-Star Projects LLC
- Tri-Star Energy Company
- Tri-Star Strata Company
- Tri-Star Drilling LLC
- West Texas Oil & Gas Corporation
- Tri-Star Australia Holding Company
- Tri-Star Petroleum Company
- Tri-Star Capital Company

# Our structure, operations, and supply chains

## Structure and operations

### Business

Tri-Star is a privately owned, explorer, producer and active investor with its Australian operations headquartered in Brisbane. Tri-Star has been actively pursuing gas, oil, and mineral exploration activities in Australia for over 30 years, with assets and land tenement holdings across Queensland, South Australia, the Northern Territory, and Western Australia. Tri-Star also holds land tenement holdings in Germany.

Tri-Star's business includes a diverse portfolio of Operated Assets, Non-Operated Assets and Royalty Interests as well as a number of other investments in listed and unlisted Australian entities. As at 31 December 2024, Tri-Star held the following assets:

- Australian operated assets & foreign operated assets managed from Brisbane (**Operated Assets**)

#### Petroleum and Coal

- *Fairfields project*, Queensland
- *Gilbert Gully project*, Queensland
- *Stonecroft project*, Queensland
- *Arcadia Coal project*, Queensland
- *Nightingale project*, South Australia

#### Minerals

- *EinGold project*, Queensland
- *Ravenswood project*, Queensland
- *Central Australian Minerals project*, Northern Territory and South Australia
- *Frome district project*, South Australia
- *Kimba project*, South Australia
- *Whyalla project*, South Australia
- *Strzelecki project*, South Australia
- *Ore Mountains project*, Saxony, Germany



*Fairfields project, Queensland*

- Australian non-operated assets (**Non-Operated Assets**)
  - *Durham Ranch & Spring Gully project*, Queensland (joint venture between APLNG, Santos, AGL Energy and Tri-Star)
  - *Spring Gully project*, Queensland (joint venture between APLNG, Santos and Tri-Star)
- Australian Royalty Interests (**Royalty Interests**)
  - *Arcadia project*, Queensland (Santos operated joint venture between GLNG Parties and APLNG)
  - *Combabula project*, Queensland (joint venture between APLNG and Santos)
  - *Condabri project*, Queensland (wholly owned by APLNG)
  - *Durham Ranch & Spring Gully project*, Queensland (joint venture between APLNG, Santos, AGL Energy and Tri-Star)
  - *Fairview CSG reservoir*, Queensland (Santos operated joint venture between GLNG Parties and APLNG)
  - *Roma East development*, Queensland (Santos operated joint venture between GLNG Parties and APLNG)
- other investments in listed and unlisted Australian entities:
  - *Omega Oil and Gas Pty Ltd* – a listed natural gas exploration company based in Queensland where Tri-Star holds a sizeable equity interest. Tri-Star has a nominee director on the Board, participates in an established Technical Committee and provides ad hoc services to the company under a Master Services Agreement.
  - *Plowden Resources Pty Ltd* – an unlisted gold exploration company with operations in Western Australia where Tri-Star holds a sizeable equity interest. Tri-Star has a nominee on the Board and participates in an established Technical Committee.

Tri-Star's role and involvement with respect to a project depends on the requirements of the underlying asset and can vary also depending on its stage of exploration and development. The exploration projects listed above, which are operated by Tri-Star, represent a range of projects at different stages of activity. These vary from early stage exploration activities through to projects which are remediating areas where drilling has previously been undertaken.

Beyond these interests, those assets identified above as Non-Operated Assets and other investments are outside the scope of this Statement as they are controlled and operated by unrelated entities to Tri-Star.

Tri-Star is an active investor in the Australian market and continues to pursue investments in accordance with our Australian investment strategy (as publicly available at [www.tri-stargroup.com/investment](http://www.tri-stargroup.com/investment)).

## Workforce

During the reporting period, Tri-Star directly employed over 43 individuals, with the majority based in Brisbane. Our workforce continues to grow, and we are committed to fostering a diverse, inclusive, and equitable workplace. Women currently represent 37% of our employees, including several key leadership roles, which reflects our strong focus on general balance across the organisation.

Tri-Star is committed to maintaining a workplace free from discrimination and actively promotes diversity and inclusion through its employment policies and practices. These

policies are designed to comply with all applicable Australian employment laws and standards, helping to mitigate the risk of modern slavery and other forms of labour exploitation within our direct operations.

We support the communities in which we operate by prioritising local employment and engaging local contractors where possible. Many of these relationships are long-standing and built on mutual trust and respect, which helps us ensure ethical labour practices and reduce modern slavery risks in our local supply chains.

### **Respect for Traditional Owners and Cultural Heritage**

Tri-Star acknowledges the Traditional Owners of the land on which we operate. We recognise their enduring connection to Country and the unique cultural, spiritual, and historical significance of these lands.

We are committed to respecting Native Title rights and interests and to fostering genuine, early, and ongoing engagement with Aboriginal and Torres Strait Islander communities. From the initial stages of exploration through to project planning and operations, we actively seek to collaborate with Traditional Owners to understand and protect cultural heritage and areas of significance.

As part of our broader human rights commitments, including efforts to identify and address modern slavery risks in our operations and supply chains, we recognise that respecting the rights and voices of Indigenous Peoples is essential. This includes ensuring that our activities do not contribute to the exploitation or marginalisation of vulnerable communities and that our business practices uphold principles of dignity, consent, and cultural respect.

In 2024, Tri-Star made all relevant payments to Traditional Owners and commissioned all necessary cultural heritage clearances before activities. Negotiations also commenced with four Traditional Owner groups. Tri-Star will approach these negotiations in good faith and to build long-term, mutually beneficial relationships.

### **Supply chains**

Tri-Star's supply chain is broad and covers the procurement of a range of goods and services typical for carrying out exploration projects, including:

- exploration activity related services including geological consultancy, remediation of sites and contractor services for drilling;
- exploration tools, equipment, and vehicles;
- safety and environmental management services;
- corporate and professional services including legal advice, financial services, and insurance; and
- head office supplies and business services.

During the reporting period, Tri-Star also sold gas from its Non-Operated Assets however all operational decision making with respect to those projects is carried out by unrelated third parties and is largely outside of Tri-Star's control.

Tri-Star looks for opportunities to support local vendors where possible and contracts and partners with predominantly Australia-domiciled companies that provide exploration services locally. In the reporting period, the majority of procurement expenditure was spent with local suppliers and Tri-Star updated contracts with longstanding vendors to ensure that the contract terms represent best market practice and are aligned with latest legislative changes.

## Modern slavery risks

During the reporting period, Tri-Star continued taking steps to understand its exposure to modern slavery risks with respect to its exploration activities. While it acknowledges that the exploration industry globally presents a variety of modern slavery risks including high-risk on-site activities and complex supply chains, Tri-Star is able to manage these risks due to its exploration activities being early stage in nature and predominantly conducted in Australia, subject to Australia's high standards for governance and legal protections for employees. Tri-Star provides employee standards and benefits which exceed those requisite standards.

During the reporting period, we did not become aware of any actual instances of modern slavery in our operations and supply chain. As Tri-Star's business continues to grow however, Tri-Star will monitor its modern slavery risks and seek to engage with its suppliers to gain greater transparency and understanding of the broader supply chain for the supply and purchase of goods and services which are outside of its supplier relationships and operations, including where suppliers may have used products purchased or manufactured in high-risk countries.

## Addressing modern slavery risks

### Actions taken by Tri-Star within reporting period

Tri-Star is committed to preventing modern slavery risks in our own business and in our supply chains. The following actions have been taken by Tri-Star to address modern slavery risks within the reporting period:

#### **Supply chain consultation, engagement, and analysis**

- Updated existing direct supplier agreements to incorporate modern slavery clauses.
- Used the Ethixbase Modern Slavery platform to issue questionnaires to direct suppliers and assessed the modern slavery risks in the supply chain.

#### **Further expanding modern slavery training initiatives**

- Increased awareness around modern slavery initiatives and training programs.

#### **Internal modern slavery governance**

- Monitored compliance of modern slavery policies and procedures.
- Reviewed and developed the Modern Slavery Management Framework.

### Actions planned to address modern slavery risks in the next reporting period

In the 2025 reporting period, Tri-Star intends to continue refining our capabilities to address modern slavery risks, and further improve the methods of assessing the effectiveness of those actions. The following opportunities for improvement over the next reporting period have been identified:

#### **Establish a modern slavery committee**

To establish a committee responsible for overseeing the implementation and progress of key modern slavery initiatives and actions.

## **Conduct a review and revision of relevant policies and procedures**

The following policies and procedures are due to be reviewed in 2025:

- Whistleblower policy
- Employee health and safety policies and procedures
- Modern slavery policy and management framework
- Procurement policies and procedures

## **Supply chain consultation, engagement, and analysis**

- Continue to update existing direct supplier agreements to incorporate modern slavery clauses.
- Continue to use Ethixbase Modern Slavery platform to issue questionnaires to direct suppliers and assess the modern slavery risks in the supply chain.

## **Staff training**

Officially roll out modern slavery training for management and employees, that includes information and tools about the prevention of modern slavery as part of Tri-Star's commitment to preventing modern slavery risks.

# **Effectiveness**

## **Assessing effectiveness**

Tri-Star is committed to implementing and enforcing effective systems, controls, and reviews to prevent and assess modern slavery in our operations and supply chains. The effectiveness of our business operations is within the scope of regular audits of operations.

The existing mechanisms in place play an important role in driving progress in addressing modern slavery risks, and the effectiveness of current modern slavery mechanisms will be assessed by the Modern Slavery Management Framework which has been developed and implemented.

Tri-Star's effectiveness in addressing modern slavery risks is reflected through its whistleblower policy where employees are expected to promptly report any misconduct. In this reporting period there were no whistleblower reports or complaints relating to modern slavery in our business operations or through our supply chains.

# **Process of consultation**

Consultation for the purposes of this statement has been appropriately undertaken by Tri-Star, and reviews have been conducted by our procurement and legal teams.

Modern slavery compliance will be addressed and managed by the following Tri-Star key personnel who represent key parts of our organisation and decision making:

- Contracts and Procurement Manager;
- General Manager – Commercial & Strategy;
- General Counsel and Company Secretary; and
- Chief Executive Officer – Australia.

## Approval

This statement was reviewed and approved by Tri-Star's Board of Directors on 12 June 2025 and is signed by Andrew Hackwood, Chief Executive Officer – Australia.

A handwritten signature in black ink, appearing to read 'A. Hackwood', written in a cursive style.

Andrew Hackwood  
CEO – Australia  
Tri-Star E&P Pty Ltd  
13 June 2025



### **Brisbane office**

Level 35, 123 Eagle Street  
Brisbane QLD 4001  
Australia

t +61 7 3236 9800  
e [info@tri-stargroup.com](mailto:info@tri-stargroup.com)

[www.tri-stargroup.com](http://www.tri-stargroup.com)