PETRONAS Australia

Modern Slavery Statement

For the period: 1 January to 31 December 2025

1.0 REPORTING ENTITIES[1]

1.1 Petronas Australia Pty Ltd (ABN 25 064 998 867) jointly submits this Modern Slavery Statement ("**Statement**") with its subsidiaries: PAPL (Upstream) Pty Limited (ABN 58 131 318 888), PAPL (Upstream II) Pty Limited (ABN 90 146 203 901) and PAPL (Downstream) Pty Limited (ABN 43 147 649 205), together, the "**Reporting Entities**".

1.2 Pursuant to the *Modern Slavery Act 2018* (Cth), the Reporting Entities jointly submit this statement for the financial year ending 31 December 2025.

2.0 STRUCTURE & OPERATIONS[2]

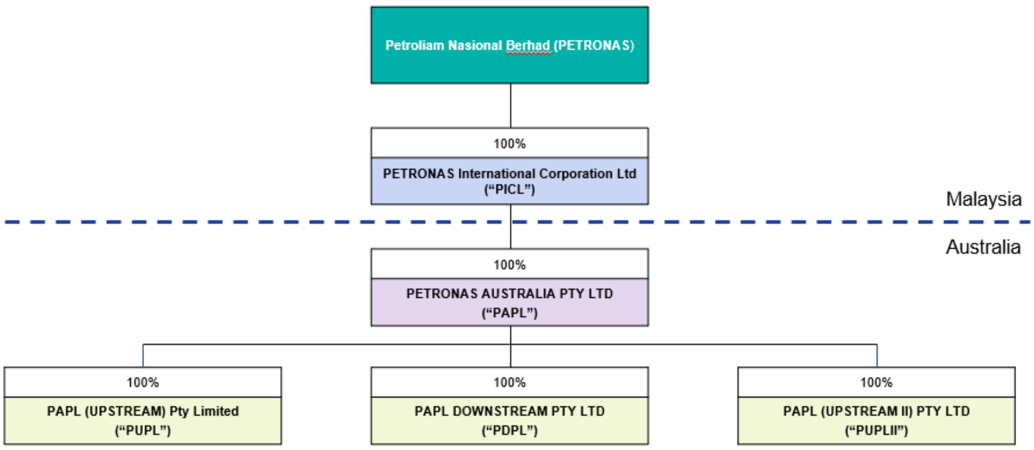
Corporate Structure

2.1 Each of the Reporting Entities is a company limited by shares and incorporated and domiciled in Australia.

2.2 Petronas Australia Pty Limited ("**PAPL**") is a wholly owned subsidiary of PETRONAS International Corporation Limited ("**PICL**"), a company incorporated in Malaysia under the *Malaysian Offshore Companies Act 1990*. The ultimate holding company is the Petroliam Nasional Berhad ("**PETRONAS**"), a Malaysian State-owned body corporate established under the *Malaysian Companies Act 1965*. PETRONAS is Malaysia's national oil and gas company.

2.3 PAPL is the legal and beneficial holder of all shares in PAPL Downstream Pty Limited ("**PDPL**"), PAPL Upstream Pty Limited ("**PUPL**") and PAPL (Upstream II) Pty Limited ("**PUPLII**").

2.4 The corporate group structure of the Reporting Entities is set out visually below.



[1] *Modern Slavery Act 2018* (Cth), s 16(1)(a).
[2] Ibid, s 16(1)(b).

Operations

2.5 As at the date of this Statement, PAPL employs 37 personnel in human resources, legal, financial, technical, accounting, commercial and safety roles. A total of 14 employees are employed on a secondment basis from PETRONAS, and 23 are locally hired. The other Reporting Entities have no employees.

2.6 The Reporting Entities are partners in joint ventures that are operated by members of the Santos group of companies as part of the Gladstone Liquefied Natural Gas Project ("**GLNG Project**"). The GLNG Project was formed to extract coal seam gas ("**CSG**") for processing into liquefied natural gas ("**LNG**") to meet export demand.

2.7 The Reporting Entities hold interests in the GLNG Project in Australia, they do not operate or conduct any gas operations.

The GLNG Project

2.8 The GLNG Project involves the development of coal seam gas fields in the Bowen and Surat Basins in Queensland and consists of downstream and upstream operations. The downstream and upstream operations are undertaken by various unincorporated joint ventures which the Reporting Entities have interests in.

2.9 The GLNG Project in Queensland produces LNG for export to global markets from the LNG plant at Gladstone. Gas is also sold into the domestic market. The LNG plant has two LNG trains with a combined capacity of 8.6 mtpa. Production from Train 1 commenced in September 2015 and Train 2 in May 2016. Feed gas is sourced from GLNG's upstream fields, Santos portfolio gas and third parties.

2.10 The participating interests in the GLNG Joint Venture are as follows:

a) Santos – 30%;

b) PAPL – 27.5%;

c) TotalEnergies – 27.5%; and

d) KOGAS – 15%.

2.11 The upstream joint ventures are operated by one of Santos CSG Pty Ltd, Santos TOGA Pty Ltd, Santos Ventures Pty Ltd and Bronco Energy Pty Ltd, all of which are part of the Santos group of companies. The Reporting Entities have interests in the upstream joint ventures forming the GLNG Project.

2.12 GLNG Operations Pty Ltd ("**GLNG OPL**") was established to operate and manage the downstream assets on behalf of the GLNG Project participants including the Reporting Entities. PAPL has a 27.5% participating interest in GLNG OPL.

2.13 50% of the offtake of LNG produced as part of the GLNG Project is delivered to Malaysia and is used as part of Malaysia's energy security source and 50% is delivered to Korea.

3.0 THE SUPPLY CHAINS AND RISKS OF MODERN SLAVERY PRACTICES[3]

3.1 PETRONAS recognises that its contractors contribute towards economic growth for the benefit of society. A supply chain that respects rights of workers while creating opportunities for development is consistent with the Contractors Code of Conduct on Human Rights ("**CoCHR**").

3.2 As the Reporting Entities' business is limited to their investments in the GLNG Project, there is overlap with the supply chain of Santos in relation to the GLNG Project as its entities are the operators of the upstream aspects of the GLNG Project.

3.3 The contractors and suppliers solely engaged by the Reporting Entities outside of the GLNG Joint Venture fall mostly within professional services such as external law and accounting firms, consultants, payroll, travel agents, recruitment agencies, and insurers. As such, the prevalence and risk of modern slavery occurring in the supply chains of these vendors is low as they rely on a highly skilled professional workforce.

3.4 In 2024, a risk analysis was undertaken by the Reporting Entities with assistance from the PETRONAS HQ Risk Management team focusing on the risks of modern slavery occurring within the Reporting Entities' supply chains. The risk analysis established that the moderate risk areas for which modern slavery might occur within the Reporting Entities' supply chains include the following industries: cleaning, information technology, hospitality (food and catering), maintenance and stationery and office supplies. These services used by the Reporting Entities represent a potential high-risk area given their reputation of employing a high proportion of blue-collar and temporary migrant workers who might be vulnerable due to not having the requisite Visa documentation to work in Australia and/or having a poor understanding of Australian workplace rights and laws which makes them more susceptible to being exploited by employers.

3.5 The cleaning company, IT service providers and hospitality providers used by the Reporting Entities completed the Know Your Customer Self-Declaration Questionnaire (**KYCQ**). Searches were also conducted across the KYC6 external database. No red flags or high likelihoods of modern slavery within any of their supply chains were highlighted.

3.6 Prior to engaging any new service providers within these industries, the entities are required to complete the KYCQ and a KYC6 search will be to ensure there are no red flags in relation to their business practices. More details surrounding the KYCQ and KYC6 searches are set out in paragraphs 4.12 to 4.16 below.

4.0 ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY PRACTICES[4]

4.1 Respecting human rights across PETRONAS' value chain, inclusive of employees, suppliers, contractors, partners and communities in which PETRONAS operates is very important to upholding its duty as a business enterprise. Human rights are the foundations of sustainable development and creating a positive social impact comes with proper management of social risks. Upholding human rights through fair and ethical practices is fundamental to PETRONAS' business.

[3] *Modern Slavery Act 2018* (Cth), s 16(1)(b) and (c).
[4] *Modern Slavery Act 2018* (Cth), s 16(1)(d).

4.2 The Reporting Entities, as part of the PETRONAS group of companies, comply with each of the following in order to address the risks of modern slavery practices in their business practices:

a) The PETRONAS Human Rights Policy (approved by PETRONAS in November 2023);

b) The PETRONAS Contractors Code of Conduct on Human Rights ("**CoCHR**");

c) PETRONAS' Code of Conduct and Business Ethics ("**CoBE**"); and

d) PETRONAS Anti-Bribery and Corruption Policy and Guideline ("**ABC Manual**").

4.3 In addition to the above, in 2025, the PAPL Modern Slavery Working Committee evolved into the broader Safety, Environmental, Sustainability and Governance Committee and targeted modern slavery and human rights related clauses were drafted and incorporated into PAPL's service level agreement template.

4.4 Further details regarding each of the actions are set out below.

Human Rights Policy

4.5 In November 2023, the PETRONAS Human Rights Policy (**HRP**) was approved by the PETRONAS Board of Directors.

4.6 The HRP commits PETRONAS (including the Reporting Entities) to respect all internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, being guided by the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, complying with all applicable laws in the countries in which PETRONAS operates.

4.7 The HRP applies to every employee, director and officer of PETRONAS, including the Reporting Entities. Third parties that may perform works or services for or on behalf of PETRONAS are encouraged to adopt the HRP or similar principles and standards.

4.8 The HRP endorses the following five key principles:

a) **Respect and acknowledgment of all internationally recognised human rights** including elimination of all forms of discrimination, modern slavery, child labour and human trafficking;

b) **Adoption of a risk-based approach to human rights due diligence**: risk-based due diligence is undertaken to identify, prevent, mitigate and address actual and potential adverse human rights impacts arising from activities performed across the organisation, in the supply chain, and resulting from business relationships;

c) **Access to effective grievance mechanisms and remedies:** access to a confidential, reasonably prompt, non-retaliatory and fair grievance mechanism for the PETRONAS group to report any adverse human rights impacts that we identify to have been caused or contributed to by the Reporting Entities;

d) **Appropriate governance for this policy and its processes groupwide**: the policy is intended to be embedded at all levels within the PETRONAS group; and

e) **Commitment to maintaining appropriate disclosure and reporting groupwide:** to ensure consistent reporting worldwide and with all relevant stakeholders.

Contractors Code of Conduct on Human Rights

4.9 The CoCHR is a statement that expresses PETRONAS' respect for internationally recognised human rights. It is based on the UN's Guiding Principles on Business and Human Rights. The CoCHR establishes PETRONAS' expectations of contractors on human rights and serves as a guide for contractors that are performing work or services for or on behalf of the PETRONAS group of companies.

4.10 At a minimum, the CoCHR requires the Reporting Entities' contractors to adhere to the following principles which directly or indirectly relate to the management of the risk of modern slavery:

a) **Freedom of labour:** By not engaging or employing people, under any circumstances, against their own free will or engaging in bonded labour/debt slavery.

b) **Prevention of child labour:** By not employing children below the legal minimum working age requirement of any country. Employees and contract personnel must be at least eighteen (18) years of age (unless otherwise determined by the local laws of the host country).

c) **Wages and benefits:** By complying with all applicable laws related to employee compensation, including minimum wage, overtime hours and legally mandated benefits.

d) **Working hours:** By complying with local laws of the host country or agreements regarding working hours, overtime hours, and work during holidays.

e) **Establishment of grievance mechanisms:** Provide a means of grievance reporting and appropriate follow-up measures while ensuring that the identity of the complainant is protected.

f) **Non-discrimination:** By respecting diversity in the workplace and not engaging in any form of unlawful discrimination based on gender, race, ethnicity, skin colour, religion, nationality, sexual orientation, age, marital status, pregnancy, political affiliation, or disability in hiring and employment practices

g) **Humane treatment:** By respecting employee's rights and ensuring no harsh and inhumane treatment, including any form of mental or physical coercion, or verbal abuse of employees.

h) **Foreign or migrant workers:** Where if foreign or migrant employees are engaged, they are to be employed in full compliance with the labour and immigration laws of the host country. Prior to hiring, the basic terms of employment must be provided to employees in their native language or language in which they understand. Passports and other forms of personal identification must remain in the employee's possession at all times and are never to be withheld by Contractor or any third party in full compliance with the labour and immigration laws of the host country.

4.11 These principles apply to all PETRONAS contractors, subcontractors, consultants, suppliers, agents, representatives and others performing work or services for or on behalf of PETRONAS group of companies. The PETRONAS group companies include questions regarding contractors', suppliers' and vendors' human rights policies including whether the company provides training in respect of human rights to its employees and the existence of grievance mechanisms within the organisation in detailed KYCQs.

KYCQ and KYC6 Due Diligence

4.12 The KYCQ and KYC6 online screening system are part of the main control activities under the Third Party Risk Management (**TPRM**) program in PETRONAS. The TPRM program seeks to instil business discipline by implementing a robust due diligence process in order to safeguard PETRONAS Group from any corporate liability that can be attributed to PETRONAS arising from the misconduct of any third parties.

4.13 The KYCQ is a questionnaire that prospective vendors, consultants, suppliers, agents, distributors, joint venture parties, contractors and subcontractors must complete which contains queries in respect of five critical legal areas including human rights and modern slavery practices.

4.14 The KYC6 online screening system is used to screen potential counterparties against a centralised, independent database managed by Acuris Risk Intelligence for sanctions, adverse media coverage, law enforcement data, corporate registry data and politically exposed person data.

4.15 In 2025, new medium to high-risk vendors[5] were issued with the KYCQ and were required to complete and return the questionnaire in order for the Reporting Entities to conduct business with them. KYC6 searches were also conducted. The Reporting Entities considered the answers provided in the KYCQs and the search results obtained from the KYC6 searches and assessed whether, among other things, the human rights procedures applied by the vendors were adequate and, if not, what measures could be put in place to mitigate or remove any potential areas of concern.

4.16 No instances of modern slavery within the Reporting Entities' supply chains based on the information provided were identified in the 2025 financial year.

CoBE

4.17 Benchmarked against international standards, the CoBE was launched for groupwide implementation in April 2012. The CoBE emphasises and advances PETRONAS' shared values of loyalty, professionalism, integrity and cohesiveness that are critical to the success and well-being of the PETRONAS group.

4.18 The CoBE applies to every individual working for or on behalf of the entire PETRONAS Group. It underpins the mission, vision and values of the Reporting Entities and requires all employees to commit to the highest standards of integrity and professionalism, mandating that business affairs are undertaken in an ethical, non-discriminatory and transparent manner.

[5] Vendors are considered medium or high-risk depending on the value of the services provided to PAPL, the industry they provided services within as well as the results of the KYC6 search.

4.19 Contractors, subcontractors, consultants, agents, representatives and others performing work or services on the Reporting Entities' behalf are also required to comply with the relevant parts of the CoBE. The CoBE contains detailed policy statements on the standards of behaviour and ethical conduct expected of each individual to whom the CoBE applies.

4.20 In 2022, the PETRONAS CoBE, which is adopted and followed by the Reporting Entities, was updated to include a human rights section under Part III: Workplace, Culture, and Environment. The update addresses occurrences of modern slavery and mandates all employees, contractors, partners and those involved in the Reporting Entities' operations to uphold the principles of respect for human rights and take measures to mitigate social and human rights risks, prohibit child labour, engage in or support human trafficking or modern slavery, including forced, bonded, or involuntary labour.

Mandatory Training

4.21 A mandatory training program titled Human Rights Management in PETRONAS exists and must be completed by all staff employed by PAPL, including new employees. The training incorporates training related to the management of the risk of modern slavery and forced labour practices within PETRONAS and its supply chains.

WhistleNOW – PETRONAS Whistleblowing Platform

4.22 All staff within PETRONAS have access to the WhistleNOW Whistleblowing Platform which provides a secure and confidential avenue to report any concerns related to corruption or ethical misconduct including suspected instances of modern slavery.

Establishment of the PAPL Anti-Modern Slavery Working Committee

4.23 In July 2024, PAPL formed an Anti-Modern Slavery Working Committee ("**Committee**"). The Committee was cross-functional and consists of representatives from PAPL Risk, Finance, Legal & Corporate Affairs and HSSE departments. In March 2025, PAPL sought to extend the scope of the committee to include safety, environmental, sustainability, governance and modern slavery (**SESG**). The Committee is now known as the PAPL SESG Committee and consists of representatives from PAPL Risk, Finance, Legal, Human Resources and Technical Departments.

4.24 The SESG Committee is responsible for, among other things:

a) undertaking risk assessments in respect of identifying risks of modern slavery within the Reporting Entities' supply chains;

b) applying, monitoring and managing the mitigations and actions put in place to prevent occurrences of modern slavery within the Reporting Entities' supply chains;

c) assessing the effectiveness of the actions taken by the Reporting Entities to address the risks; and

d) preparing the Reporting Entities' Modern Slavery Statement and reporting to the boards of the Reporting Entities;

e) providing updates on the latest information and emerging issues and Climate-Related Financial Disclosure (**CRFD**) developments; and

f) discussing information related to incidents and investigation outcomes (with respect to privacy and confidentiality), communicate any relevant new policies and changes to existing polices or procedures. Share details of any identified safety hazards in the office and details of wellbeing initiatives and activities planned.

Modern Slavery Clauses in Service Level Agreement Template

4.25 In the 2025 financial year, PAPL updated its template service level agreements to include clauses addressing modern slavery. The clauses require that each party:

a) must comply and use reasonable endeavours to ensure compliance with applicable Modern Slavery Laws;

b) must not engage in any activity, practice or conduct that would constitute Modern Slavery;

c) not use any goods or materials in connection with its performance and obligations under the agreement that it knows or reasonably suspects have been sourced or made using Modern Slavery;

d) use reasonable endeavours to ensure that all suppliers in its supply chains do not engage in any activity, practice or conduct that would constitute Modern Slavery if carried out in Australia.

5.0 ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS TO ADDRESS RISKS[6]

5.1 The establishment of the SESG Committee in 2025 was an essential part of the Reporting Entities' future management of modern slavery risks. Having a focused SESG Committee will ensure that proper mitigations are put in place and maintained. In the near future, the SESG Committee also aims to establish a remediation strategy that will be applied by the Reporting Entities identifying what will be done if modern slavery is identified in the supply chain/s.

5.2 The Reporting Entities through the Committee will continue to ensure that all staff complete the mandatory training titled Human Rights Management in PETRONAS. Consideration will also be given as to when and how the training should be updated and the frequency of the training.

5.3 The risk-assessment conducted found that the due-diligence processes in place, including the KYCQ and KYC6 searches are effective tools to identify any potential risks of modern slavery in the Reporting Entities' supply chains. However, the KYCQs should be updated to include specified questions regarding risks of modern slavery in supply chains and issued to all new vendors and assessed by the Reporting Entities prior to conducting business.

5.4 The inclusion of modern slavery clauses in PAPL's template Service Level Agreements is a positive inclusion and provides PAPL with reasonable assurance that its suppliers have been bound by terms requiring them to comply with Modern Slavery Laws.

5.5 The Reporting Entities will also continue to review and consider the Modern Slavery Statements of Santos as the Operator of the upstream aspects of the GLNG Project

[6] *Modern Slavery Act 2018* (Cth), s 16(1)(e).

as well as any relevant vendors to monitor and assess any further risks of modern slavery in the Reporting Entities' supply chains.

6.0 CONSULTATION PROCESS WITH OTHER ENTITIES[7]

6.1 Consultation regarding the Modern Slavery reporting requirements has taken place at the board level for each of the Reporting Entities.

6.2 In the preparation of this Modern Slavery Statement, the 2024 Santos Modern Slavery statement has been reviewed and considered in light of Santos' position as the Operator of the upstream entities forming the GLNG Project.

7.0 BOARD APPROVAL

7.1 This Modern Slavery Statement has been approved by the Boards of Directors (principal governing bodies) of each of the Reporting Entities. The board of Petronas Australia Pty Limited approved this statement on 8 May 2026. The boards of PAPL Downstream Pty Limited, PAPL Upstream Pty Limited and PAPL (Upstream II) Pty Limited approved this statement on 25 June 2026.

Ahmad Azizi B Ahmad Kamil
Managing Director & Chief Executive Officer
Petronas Australia Pty Limited

Ahmad Azizi B Ahmad Kamil
Director & Authorised Representative
PAPL Downstream Pty Limited

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[7] *Modern Slavery Act 2018* (Cth), s 16(1)(f).

MODERN SLAVERY STATEMENT ANNEXURE

Mandatory criteria	Page numbers
a) Identify the reporting entities	1
b) Describe the reporting entities' structure, operations and supply chains	1 – 3
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	3 – 7
e) Describe how the reporting entity assesses the effectiveness of these actions	8 – 9
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	9
g) Board Approval	9