



Modern Slavery Statement for financial year 2023

This Joint Modern Slavery Statement ("Statement") is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018 (Cth)* ("the Act") for the reporting period 1 January 2023 to 31 December 2023 ("FY23" or reporting period").

We recognise the importance of taking steps to assess modern slavery risks and combat modern slavery which can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business, and can pose significant legal and reputational risks to entities.

We are committed to making steps to prevent slavery and human trafficking in our operations and supply chains. We do not tolerate modern slavery and will not knowingly engage with any consultants, suppliers or contractors that engage in modern slavery.

Reporting Entities

This Statement applies to the following reporting entities:

SK E&S Australia Pty Ltd ("SKAU")

ABN: 55 158 702 071

Registered Office: Level 27, Central Park, 152-158 St Georges Terrace, Perth WA 6000, Australia

SKAU and its Australian affiliate entities (collectively "SKAU Group") include:

PRISM Darwin Pipeline Pty Ltd ("PDP")

ABN: 98 655 024 963

BU12 Australia Pty Ltd ("BU12")

ABN: 84 644 038 433

BU13 Australia Pty Ltd ("BU13")

ABN: 31 644 038 648

For the sake of transparency, we note that each of BU12 and BU13 had revenues of more than \$100 million in the previous financial years ended 31 December 2021 and 31 December 2022 and therefore were required to report and publish annual Modern Slavery statements for the respective financial years.

Given that the Act aims to encourage reporting entities to take a continuous improvement approach, we have decided to develop and strengthen our response to modern slavery over time since we became aware of the Act.

Further, while SKAU and PDP are not required to report under the Act due to their revenues being below the reporting requirement threshold, it is our preferred compliance approach to prepare a Joint Statement that includes all Australian entities (as listed above).

This Modern Slavery Statement is SKAU Group's first Statement. We recognise the need for continued effort and collaboration to strengthen our approach to modern slavery risk management each year and we are committed to undertaking the process of identifying, assessing, mitigating, and addressing the modern slavery risks in our operations and supply chains.

Structure, Operations and Supply Chain

SKAU is a company incorporated in Australia and was established in 2012 for the purposes of acquiring a 37.5% interest in the Barossa gas upstream project. SKAU is wholly owned by SK E&S Co Ltd ("SK E&S"), which is a company incorporated in South Korea.

SKAU operates from its office in Perth, Western Australia, and does not own or control any other entities. SKAU employees are employed locally or seconded from its parent company, SK E&S. The total number of employees is 13 as of the date of this Statement.

In addition:

- PDP is an entity incorporated in Australia for the purpose of acquiring the 25% interest in the Bayu-Undan Darwin Pipeline asset.
- BU12 and BU13 are entities incorporated in Australia for the purpose of acquiring the interests of 15.9% and 9.1% respectively in the Bayu-Undan Production Sharing Contracts.

These Australian entities within the SKAU Group, being SKAU, PDP, BU12 and BU13, are special purpose entities incorporated on a project/asset basis.

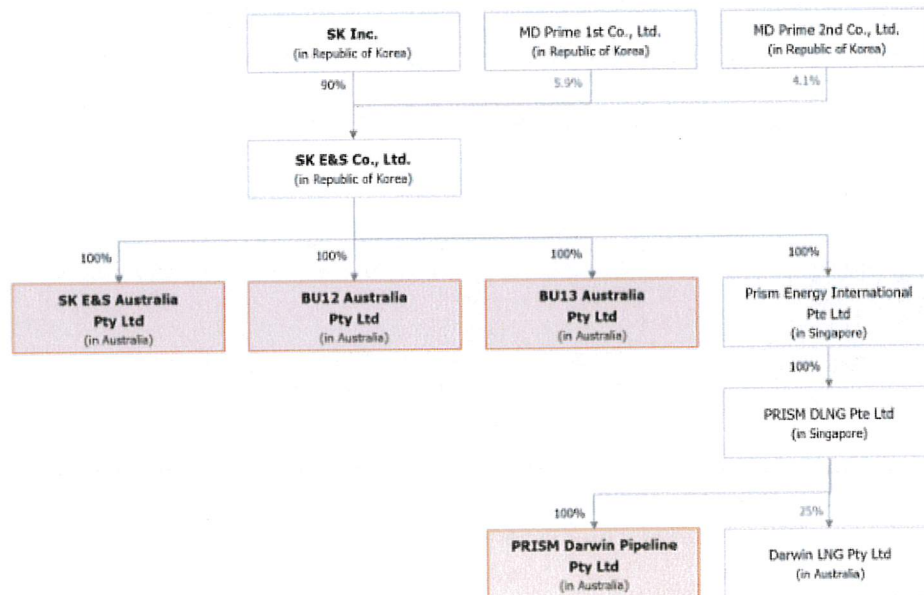


Figure 1. Organisational structure

SKAU Group's main operations are their investments in non-managed/non-operated joint ventures involved in gas development projects. As such, the SKAU Group's day-to-day activities relating to the project/asset are non-operational and limited to participating in operating committees and management meetings as well as monitoring development/production status. In doing so, SKAU provides office support and management services to each of its Australian affiliate companies to manage its assets/projects.

The primary goods and services procured in FY23 were in the following categories:

- Professional services, such as legal, accounting and consulting services
- Marketing and events, such as promotional materials and venue hire
- Office services and products, such as utilities and cleaning
- Technology services and products, such as IT support and infrastructure
- Travel services and products, such as business travel, flights, and accommodation

In relation to the investment projects, we often do not have full visibility of procurement activities and supply chain matters of the operators given the nature of the operations undertaken by the SKAU Group. The operators have policies and procedures in place in relation to the mitigation of modern slavery risks.

Modern Slavery Risks

The Modern Slavery Act describes modern slavery as situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery victims are often vulnerable to exploitation due to their background, migration status or structural factors like poverty. Modern slavery situations can include trafficking in persons, servitude, forced labour, debt bondage and the worst forms of child labour¹

Modern slavery can occur in any country and any industry, including the natural gas sector. The risk of modern slavery in the natural gas sector can manifest in many ways, including through:

- Complex supply chains that lack transparency
- Remote and isolated worksites
- Utilisation of low-skilled labour
- Contracting and subcontracting practices

Whilst the SKAU Group is not aware of any modern slavery practices occurring in its operations or supply chains during the reporting period, we acknowledge there may be a risk of the SKAU Group engaging a supplier that is involved in modern slavery. Such a risk is assumed to be low on the basis its direct engagements are limited to those with local law firms, accounting firms and professional advisors. The SKAU Group is considering implementing some screening of suppliers for potential involvement in modern slavery practices in its procurement process.

There is also a risk of the SKAU Group being indirectly involved in modern slavery practices or entering into a joint venture or a business relationship with an entity that is directly or indirectly involved in modern slavery practices. This risk is also considered low based on due diligence undertaken by the SKAU Group prior to entering into a new joint venture and/or business relationship.

Actions taken to assess and address Modern Slavery Risks

As a wholly owned entity of SK E&S, the SKAU Group abides by the obligations set out in the SK E&S corporate management system, which is designed to create value for stakeholders such as customers, employees, shareholders, business partners, and society.

The SKAU Group supports the principles of the United Nations *Universal Declaration of Human Rights* and the United Nations *Guiding Principles on Business and Human Rights* and adheres to the

¹ Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities_May 2023

operating guidelines and relevant labour laws and policies of domestic and foreign jurisdictions in our management practices. We strive to do our best to prevent human rights violations in the course of our business activities.

We actively comply with global initiatives, including the International Labour Organization (“ILO”) and Organisation for Economic Co-operation and Development (“OECD”) guidelines. Our Human Rights Policy is a basic obligation that our employees, overseas corporations, and all business partners must comply with.

SK E&S has developed a set of Operating Guidelines for Human Rights Management, which includes:

- A respect for human rights
- Aligning working hours and overtime to standards set by national or regional labour laws
- Prohibition of forced labour and child labour
- Freedom of association
- Safe and supportive working environments
- Following the principle of ‘where there is influence, there is responsibility’ with the expectation that our business partners implement human rights management.

Supporting ESG Management of Business Partners

The ESG Code of Conduct for Business Partners includes the core directions in supporting ESG management of SK E&S business partners, and covers topics such as environment, human rights, safety and health, and ethics. It is mandatory for business partners to pledge to comply with this ESG Code when signing a contract.

Principles In Businesses with Partner Companies

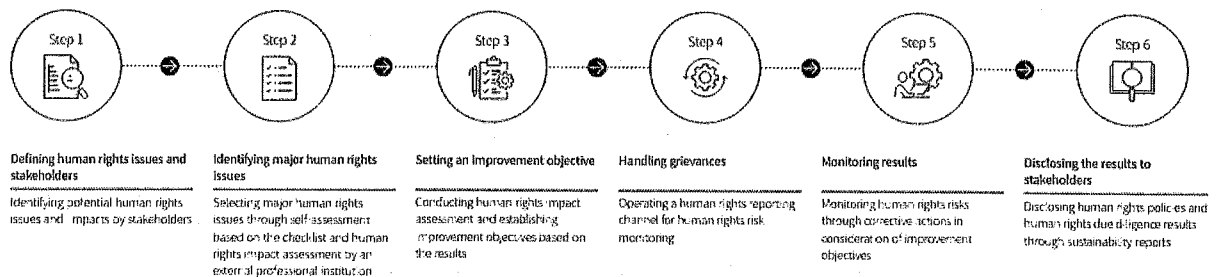
Compliance with the Code of Procurement Ethics	Establishment of Fair Bid Evaluation Guideline	Establishment of ESG Code of Conduct for Suppliers	Compliance with the General Procurement Principles of the Procurement Management Regulations
<ul style="list-style-type: none"> • Compliance with the basic principles of fair and transparent trade • Compliance with laws and international conventions (Declaration of Human Rights, UNGC, etc.) • Report violations and protect whistleblowers 	<ul style="list-style-type: none"> • Establishment and compliance with supplier selection principles, bidding process, detailed guidelines, etc. 	<ul style="list-style-type: none"> • Compliance with ESG management systems such as environment, human rights, safety and health, and ethics 	<ul style="list-style-type: none"> • Compliance with corporate social responsibilities such as shared growth, labor, human rights, anti-corruption, and environment

Business Partner ESG Evaluation Index

SK E&S conducts due diligence and ESG assessments for selected business partners using key ESG indicators to evaluate their performance across environment, social, and governance issues.

Social	Safety	Safety certification	<ul style="list-style-type: none"> • Hold certification
		Industrial safety	<ul style="list-style-type: none"> • Manage worker health and safety risk factors • Conduct industrial safety education • Provide and use personal protective equipment • Establish emergency response system • Implement emergency evacuation training • Control safety risk factors of production and machine equipment
		Industrial accidents and diseases	<ul style="list-style-type: none"> • Establish management system to prevent industrial accidents and diseases
	Safety and health communication	<ul style="list-style-type: none"> • Provide information on worksite health and safety 	
	Labor Human Rights	Human rights policies and regulations	<ul style="list-style-type: none"> • Hold human rights policies and regulations
		Labor practice and guarantee of rights	<ul style="list-style-type: none"> • Prohibition of forced labor • Payment of statutory wage
Humane treatment		<ul style="list-style-type: none"> • Prohibition of inhumane treatment • Notice of disciplinary action against inhumane treatment 	
Freedom of association	<ul style="list-style-type: none"> • Right to form and participate in labor union, guarantee right to collective bargaining 		

Human Rights Due Diligence Process



Handling Human Rights Grievances

All stakeholders can report human rights-related grievances through various channels, such as e-mail, phone, letter, or via the human rights grievance reporting board. We respond to the reported information by initiating an investigation within three business days and concluding the investigation within 20 days after receipt, in principle. If the incident is confirmed as a human rights violation, we convene the Human Rights Grievance Handling Committee, which will respond in line with corporate regulations.

The process is transparently communicated to the informant, and we endeavour to maintain confidentiality and protect victims. More information on our Speak Up program can be found at <https://ethics.sk.co.kr/>.

Effectiveness of the Modern Slavery Actions

As this is SKAU Group's first Statement, no specific measures were taken during the reporting period to assess the effectiveness of our actions in addressing our modern slavery risks. We acknowledge this gap and understand the importance of evaluating the impact of our efforts to ensure continuous improvement. SKAU Group aims to implement effectiveness measures in the future. This includes implementation of screening of suppliers for potential involvement in modern slavery practices in its procurement process.

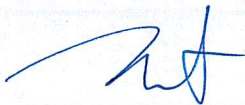
Consultation with Australian affiliate entities

In the preparation of this Joint Statement, Management and personnel from all reporting entities have been working together in relation to the activities described. Note, PDP, BU12 and BU13 are entities incorporated in Australia for the purpose of acquiring the interest in specific projects/assets.

None of the entities within the SKAU Group own or control other entities.

Approval for this Statement

This Statement was approved by the Board of SK E&S Australia Pty Ltd on 4 July 2024. The board of SK E&S Australia Pty Ltd approved this Statement on behalf of the reporting entities covered by the Statement: PRISM Darwin Pipeline Pty Ltd, BU12 Australia Pty Ltd and BU13 Australia Pty Ltd. This Statement is signed by Ilyoung Kim in his role as the managing director of SK E&S Australia Pty Ltd, PRISM Darwin Pipeline Pty Ltd, BU12 Australia Pty Ltd and BU13 Australia Pty Ltd.



Ilyoung Kim
Managing Director of SK E&S Australia Pty Ltd
4 July 2024