



Denison Gas Limited Modern Slavery Statement

Financial Year 2024

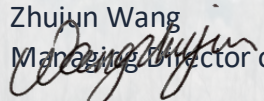
Denison Gas Limited
(ABN 86 625 883 561)

Denison is committed to maintaining a high standard of integrity, investor confidence and good corporate governance. As part of this undertaking, we are committed to supporting and respecting the protection of internationally proclaimed human rights.

We understand that modern slavery and human trafficking can occur in many forms and are committed to operating responsibly and ensuring that we have robust standards and processes to minimise and address modern slavery risks.

The financial year ending 30 June 2024 is the first year that Denison has become subject to mandatory reporting under the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**). Our inaugural statement provides an assessment of the modern slavery risk in our operations and supply chains at the tier one level, outlines the framework we have put in place to mitigate the modern slavery risk and expresses our commitments for future action.

This statement was approved by the board of Denison Gas Limited in its capacity as principal governing body of Denison Gas Limited on 26 November 2024 and is signed by Mr Zhujun Wang in his role as the managing director of Denison.

Zhujun Wang

Managing Director of Denison
26 November 2024



Our Values

*We care about people and
the environment*

We collaborate with purpose

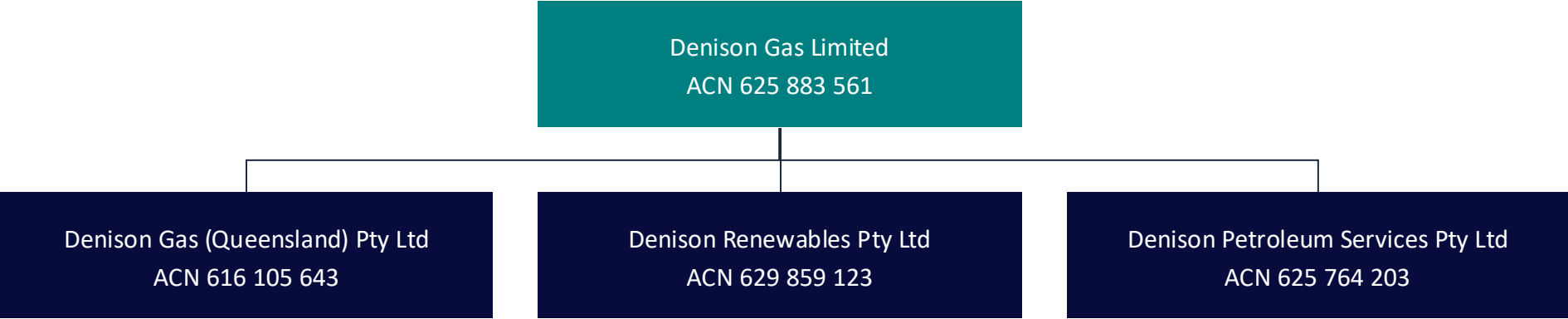
We act with integrity

We deliver results

Reporting Entity

This Modern Slavery Statement by Denison Gas Limited (ABN 86 625 883 561) and its controlled entities (**Denison**) is prepared as required by the *Modern Slavery Act* for the financial year ended 30 June 2024. All controlled entities operate under the direction and governance of Denison Gas Limited. This statement does not cover our non-operated joint venture operations.

As at 30 June 2024, the Denison Group was as follows:



These controlled entities are covered by Denison’s policies, procedures, standards and systems including those relating to Governance, Procurement, Risk, Health and Safety and Human Resources.

During the reporting period this statement covers, we actively engaged and consulted with our controlled entities in the development of this statement. We discussed with staff of our controlled entities the details of the reporting requirements under the Modern Slavery Act, the actions we intend to take to address these requirements and provided them with relevant information, documentation, systems and updates.

Denison Registered office:
Suite 1501, Level 15, Tower A, The Zenith Building, 821 Pacific Highway, Chatswood, NSW 2067, Australia

Our Business Structure, Operations, and Supply Chains (1/3)

Denison is an independent gas group engaged in the production and exploration of gas in Queensland, and headquartered in Chatswood, New South Wales, Australia with a secondary office in Brisbane, Queensland, Australia.

Our Business Structure

Denison is a gas production and exploration group focused on both efficiently increasing its existing conventional gas production and developing the significant unconventional resources within its Denison Trough tenement areas in Queensland. Denison is a key supplier of natural gas to the Australian East coast domestic market.

Denison was established in 2016, with the intention of acquiring existing gas field development projects with significant hydrocarbon potential which were otherwise underdeveloped, underfunded or overlooked. Since April 2019, Denison has been operating 14 conventional gas fields, 2 gas processing facilities, 5 additional gas compression facilities and a 324-kilometre gas pipeline network connected to the open-access Eastern Australian gas transmission system. Over the last five years, Denison has focused on bringing additional 2P conventional gas reserves into production, filling its available gas processing capacity, meeting its executed gas sales agreements through to 2026, and exploring to find new horizons and significantly increase reserves. Denison is also focused on the development of its contingent coal seam gas and deep tight gas resources to position itself to become a significant independent producer into the East Australian gas market.

Denison's assets are located in the Denison Trough of the Surat-Bowen Basin in Queensland, Australia. Denison's Trough assets comprise three operating areas namely, the Denison North Assets, the Denison South Assets and the Denison South "Deeps" Assets.



Our Business Structure, Operations, and Supply Chains (2/3)

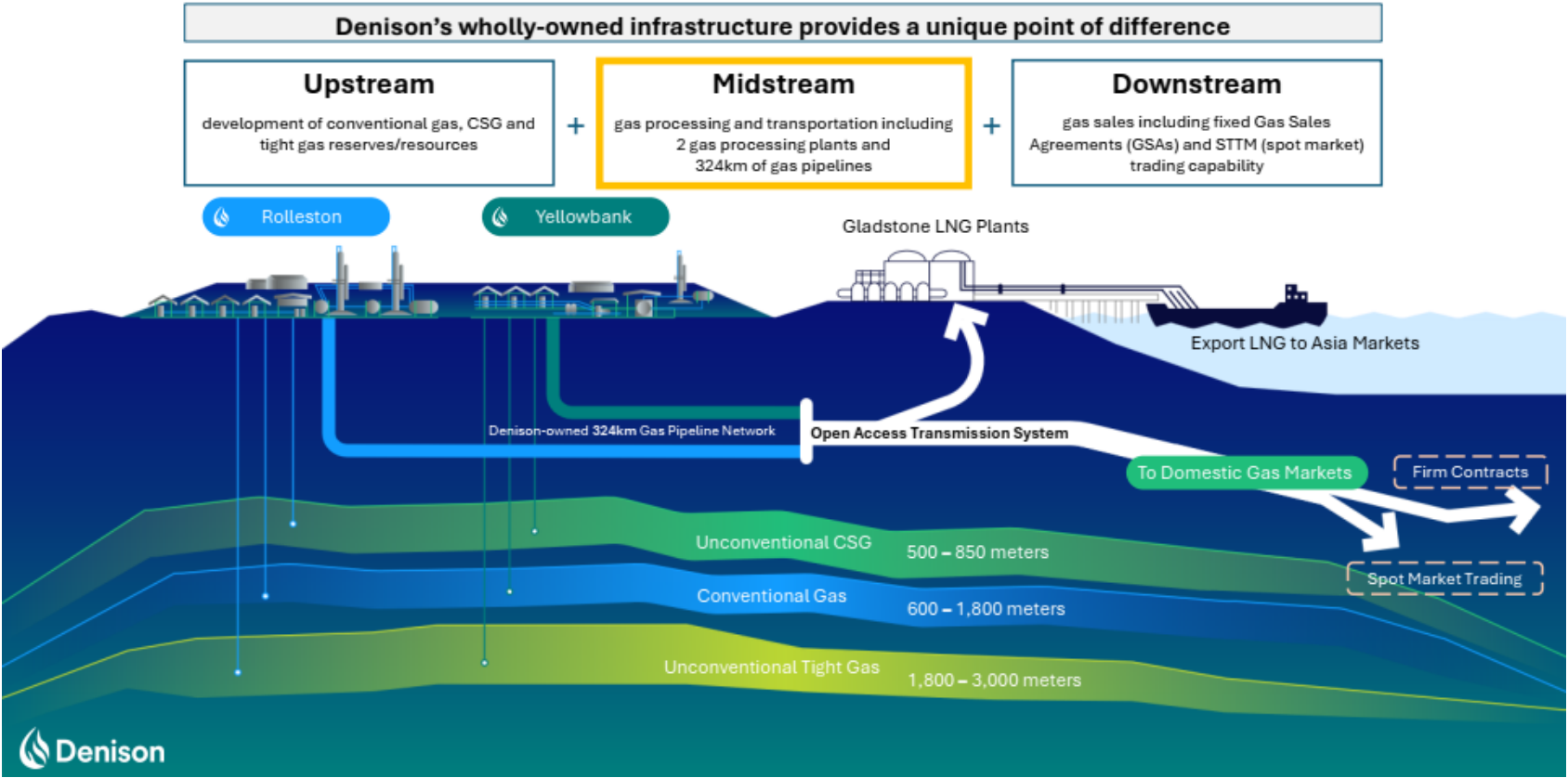
Our Operations

Denison’s operations include exploration, development, production and processing of hydrocarbons. The infrastructure and activities associated with exploration and production operations typically comprises seismic surveys, development of access tracks, roads and drill pads, drilling well completions, testing, wellheads, processing facilities, pipelines, storage facilities, and accommodation facilities for our employees.

For more information on our assets and operations, refer to the FY24 Annual Report.

Denison contributes to its local and regional communities through taxes, royalties, job creation and supporting local suppliers where possible.

As of 30 June 2024, Denison employed 85 people and 13 sole contractors.



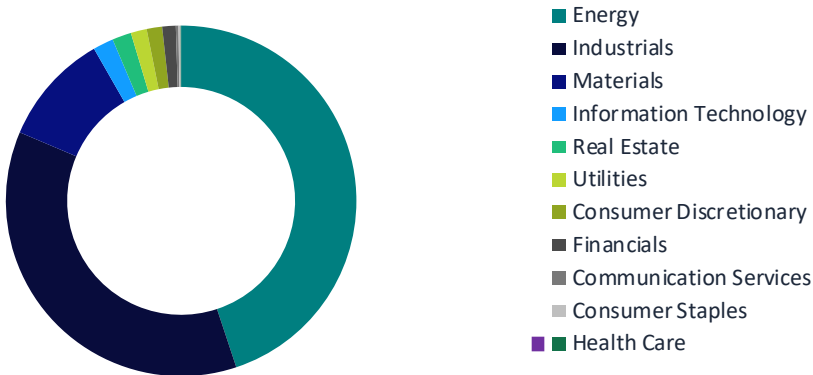
Our Business Structure, Operations, and Supply Chains (3/3)

Our Supply Chains

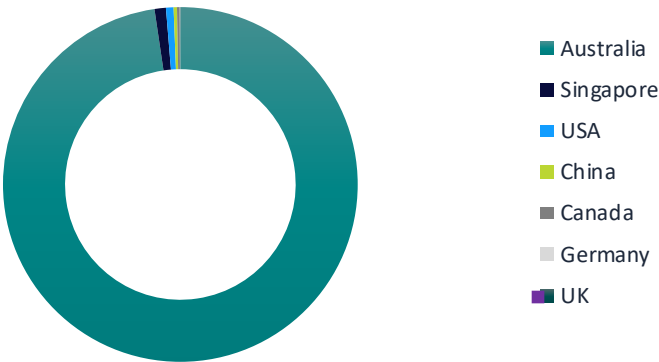
As an oil and gas company, our supply chains include suppliers involved with oil and gas field engineering, drilling, construction and technical services, logistics and transportation, specialist consultancies and labour and corporate services. To facilitate our operations, we obtain a wide range of products and services including:

- drilling, process and development equipment and services, including wellhead and wellsite equipment and services;
- engineering, construction and technical services;
- logistical and transportation services;
- site equipment, management and maintenance services, support services, and civil and construction equipment and services;
- energy, utilities and consumables; and
- labour and corporate services including IT, accounting, professional and administrative services.

FY24 Categorisation of Tier 1 Suppliers Based on Spend



FY24 Spend per Tier 1 Supplier Country of Origin



Our supply chains in FY24 consisted of 454 direct (or tier 1) suppliers and a total of AU\$55 million in procurement expenditure, of which approximately 98% was paid to suppliers located in Australia and less than 2% to international suppliers.

1. Based on PO only, excluding payments to government agencies, landholders, sole contractors and charities. Transactions carried out by credit cards are excluded unless made under a PO due to small amounts.

Risks of Modern Slavery Practices in our Operations and Supply Chains (1/4)



We strive to conduct our business in a manner consistent with the Denison Values including prioritising people, safety, health, environment and integrity.

Governance

Denison has issued policies and procedures to promote ethical and legally compliant business conduct, notably:

- 01 The Supplier Code of Conduct
- 02 The Employee Code of Conduct
- 03 The ESG Policy
- 04 The Corporate Social Responsibility Policy
- 05 The Anti-Slavery Policy
- 06 The Modern Slavery Screening Procedure
- 08 The Anti-Bribery and Corruption Policy
- 07 The Procurement Policy
- 09 The Procurement Procedure

Our policies and Code of Conduct guide our actions and support our commitment to prevent human rights violations including modern slavery from occurring in our operations and supply chains.

During FY24, the responsibility over matters relating to human rights and modern slavery sat with the Board and its committees. The Board was provided with regular briefings on all non-financial matters.

At a management level, modern slavery related responsibilities are implemented by the senior management team through training and supervision of the procurement process.

Risk Oversight and Management

The Board provides oversight of corporate and business risks and proactively consider and review risks relating to social, economic, environmental and sustainability issues and include in particular those associated with maintaining a social license to operate, reputation, health, safety, environment, compliance and financial risk. The top risks are continually reviewed and updated in the corporate risk register, as well as their controls and mitigation measures.



Risks of Modern Slavery Practices in our Operations and Supply Chains (2/4)



Supply Chains Assessment

Modern slavery risks are often described as ‘hidden in plain sight’ and therefore, the identification of Denison’s exposure to modern slavery risks requires continuous review and evaluation.

Denison understands that the footprint of its supply chains extends beyond domestic borders and across various sectors, as well as beyond the geographical base of our direct suppliers. In FY24, being the first year of reporting, the scope of Denison’s modern slavery review was limited to the first tier of suppliers, i.e. our direct suppliers. Most of Denison’s spending is with suppliers based in Australia (98%). Most of Denison’s spending with international suppliers is with suppliers located in countries with low prevalence of modern slavery by reference to the Global Slavery Index (2023).

As Denison has started implementing its renewable energy strategy, notably by installing solar panels to electrify its office and camp accommodation, it is aware of the higher modern slavery risk in the supply chain involved in the manufacturing of solar panel.

In relation to human rights risks in our operations, we comply with all the labour, employment (including the Fair Work Act 2009 (Cth) and applicable modern awards), immigration and whistle-blower protection laws of Australia.

Consistent with our Code of Conduct, we are committed to:

- operating with care, prioritising the safety and health of all people and the environment;
- acting honestly and with high standards of personal integrity including treating people with respect;
- complying with the laws and regulations that apply to Denison and its operations;
- not knowingly participating in any illegal or unethical activity; and
- striving to be good corporate citizens and maintaining our social licence to operate including by dealing with stakeholders, customers and suppliers fairly.

Risks of Modern Slavery Practices in our Operations and Supply Chains (3/4)

Operational Assessment

As an upstream oil and gas company that employs highly skilled and professional employees and operates solely in Australia, Denison considers the risk of modern slavery within its direct business operations is low, in line with its stated level of risk appetite and tolerance threshold regarding the respect of human rights. This means that mitigation measures are necessary if a proposed supply has been screened and shows a medium, high or very high risk of modern slavery.

We are accountable for our decisions and actions acting ethically at all times. We engage with the communities in which we operate and are committed to a respectful co-existence.

We are respectful towards human rights and the safety of our workforce, suppliers and communities in which we operate and comply with all local and international laws to ensure that international human rights are respected across the business. We also acknowledge that in many instances modern slavery can be hard to identify and can occur in the unlikeliest places.

Denison's suppliers are spread across 7 countries globally that we directly procure from with majority of the primary suppliers (436 out of 454) located in Australia.

As per the Global Slavery Index (2023), modern slavery risks can vary depending on the country from which goods and services are procured. According to this Index, Australia, which is home to more than 98% of our primary spend, is considered to be a very low-risk country for modern slavery. Around 1.6% of our spend was based in other low-risk countries such as Singapore, Canada, the United Kingdom and the United States. The remainder of Denison spend (0.4%) was in high-risk countries like China.



Risks of Modern Slavery Practices in our Operations and Supply Chains (4/4)

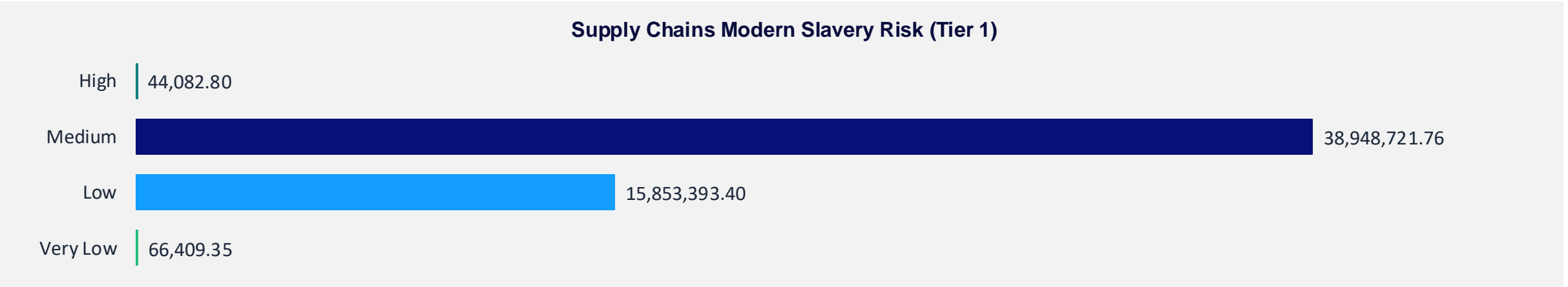
Operational Assessment (cont.)

The following risk factors associated with modern slavery informed our inherent risk analysis:

- **Geographic risk** – Certain countries are associated with a higher risk of modern slavery practices (for example, as listed in the [Global Slavery Index](#)).
- **Sector and Industry Risk** – Certain industry sectors are deemed higher risk in international and national guidance documentation (for example, as set out in the [ACSI guide on Modern Slavery Risks, Rights & Responsibilities, 2019](#)).
- **Product and Services Risk** – Certain commodities and products are deemed higher risk in international guidance documentation (for example, as set out in [US Department of Labor’s 2022 List of Goods Produced by Child and Forced Labor](#)).

The following factors affect the residual modern slavery risk rating of suppliers after obtaining responses to modern slavery self-assessment questionnaires:

- **Supply Chain Model Risk** – Longer supply chains have less transparency.
- **Entity risks** – Governance and compliance culture.



Actions Taken by Denison to Assess and Address Modern Slavery Risks (1/2)

As soon as it started operations, Denison adopted a strong governance framework to establish the corporate culture of respect. This was reflected in the issue of a Code of Conduct, induction processes and the company-wide annual training, as well as a Procurement Procedure providing clear guidance on ethical principles applicable to purchases.

In FY24, Denison carried out the following actions:

1. Policy Development and Awareness Training

The Board adopted its anti-slavery policy in October 2023 to acknowledge the risk of modern slavery in its operations and supply chains and to outline high level principles by which Denison expresses its commitment to identify, reduce and mitigate the risk of modern slavery practices within its supply chains and business operations. This policy forms part of Denison’s risk management framework and it applies to all employees, directors and officers. In order to ensure its effectiveness, Denison updated its whistle-blower protection policy and its whistle-blower hotline and electronic notification system.

Denison also updated its Procurement Procedures to include specifics about human rights principles and the risk of modern slavery.

In May 2024, Denison issued a supplier code of conduct as we expect our service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chains.

Denison delivered modern slavery awareness training to staff.

2. Due Diligence

In FY24, Denison carried out due diligence on its supply chains and on its workforce to understand how exposed Denison is to the modern slavery risks, using the software Informed 365.

3. Update of Supplier Terms & Conditions

We updated supply contract templates to include undertakings by suppliers to be aware of modern slavery, notify Denison of any known instances and, where relevant, undertake to reduce their modern slavery risk. They also include a clause requiring suppliers to take all steps reasonably necessary to ensure that the supplier does not engage in, and its supply chains do not involve, modern slavery practices and to answer any modern slavery self-assessment questionnaire relating to the supplier’s practices to minimise the Modern Slavery risk in its operations and supply chains.



Actions Taken by Denison to Assess and Address Modern Slavery Risks (2/2)

4. Update of Procurement Workflow

We engaged the software provider Informed 365 in order to have a system allowing us to screen suppliers for their modern slavery risk and modify our procurement workflows so that considerations of modern slavery become part of the procurement decision. We used this system to carry out the modern slavery audit of our FY24 tier-one suppliers.

5. Recruitment and Human Resources Practices

Denison has put in place policies and procedures to ensure fair treatment for its workforce. Our Human Resources Manager (along with other parts of the business) regularly undertake reviews of existing policies and procedures to ensure they effectively address the risk of modern slavery. Most of our workforce is employed directly under permanent, fixed-term, part-time or enterprise bargaining agreement arrangements and all of our employment contracts meet or exceed the applicable employment legislation in Australia. Additionally, Denison does not partake in high risk or unethical labour engagement practices such as:

- Charging employees for recruitment fees;
- Using child labour; and
- Undertaking deceptive recruitment practices.



Future Commitments (1/2)

In FY25, Denison intends to carry out the following actions:

1. Policy Development

Denison intends to strengthen its management of the modern slavery risk by introducing a modern slavery screening procedure to be automated as part of the procurement process. This will allow our project, planning and purchasing teams to integrate the modern slavery risk assessment in their workflow when choosing and onboarding a supplier.

2. Screening and Supplier Self-Assessment Questionnaire (SAQ)

We will continue using the modern slavery indicators around high-risk industry sectors, commodities or products and countries or geographies to assess potential modern slavery risks in our business as part of our commitment to continuously review, improve and develop our modern slavery risk mitigation measures.

At the date of this statement, a screening process has been implemented and automated to assess the inherent modern slavery risk rating of new suppliers based on their industry risk and their country risk.

As part of the mitigation measures, we have put in place a modern slavery questionnaire or self-assessment questionnaire (SAQ) that suppliers with a risk rating of medium, high or very high need to complete. This will enable Denison to assess their residual modern slavery risk rating following the assessment of the mitigation measures they have put in place regarding their own operations and supply chains.

Our current suppliers with a risk rating of medium, high and very high will be sent the

SAQ during FY25, with the intent that a majority of our current suppliers will have responded by the end of the FY. The renewal of master supply agreements will be subject to satisfactory completion of the SAQ. This concerns a majority of our suppliers as their inherent risk is rated at medium due to the high risk rating of our gas industry, despite the very low rating of Australia as a country.

New suppliers with a risk rating of medium, high and very high will be sent the SAQ as part of the onboarding process.

This will enable us to carry out further assessment of our supply chains at the tier-two level.



Future Commitments (2/2)

In FY25, Denison intends to carry out the following actions (cont.):

3. Update of Supplier Terms & Conditions

At the date of this statement, master supply agreement templates and purchase order terms and conditions have now been updated to include modern slavery clauses. We intend that those templates will be used at the time of renewal of master supply agreements and for any new supplies.

4. Training

We will continue to enhance our staff training by focusing on specific types of supplies depending on the type of projects that Denison undertakes. As Denison expands its projects in renewable energy, we will review our corresponding exposure and ensure that our staff are aware of the heightened risk and that our mitigation strategies are relevant.

We will focus on engaging with our suppliers to make them aware of our journey in assessing and improving the human rights score of our supply chains.

5. Risk Management

We will continue to strengthen our risk management controls, improve the transparency of our risk profile and collaborate with suppliers where appropriate to address the risks of modern slavery in our operations and supply chains.



Assessing Effectiveness of Actions

We understand the importance of assessing the effectiveness of the actions we undertake to assess and address modern slavery risks in our operations and supply chains.

As this is our first year of reporting on modern slavery, we have put in place a number of actions and systems to audit retrospectively our supply chains in order to assess our modern slavery risk. We have analysed our direct (or tier one) suppliers. We believe that the integration of the modern slavery assessment into our automated workflows is an appropriate measure to make our process effective.

We also asked our workforce (irrespective of their role in procurement) to carry out specific modern slavery awareness training to sensitise them to the existence and relevance of modern slavery to their day-to-day work.

In coming years, we intend to track our performance and assess the quality and effectiveness of our actions by establishing specific key performance indicators. These include response rates to the SAQ, deep dives with identified high potential exposure suppliers, continuing induction and annual awareness training, monitoring the proportion of employees undergoing that training, and monitoring the number of complaints received and remedied under our whistle-blower protection policy.

