TRI-STAR

18/06/2026

Modern Slavery Statement

This is Tri-Star's fourth Modern Slavery Statement, in accordance with the Modern Slavery Act 2018 (Cth), covering the 1 January to 31 December 2025 reporting period.

Contents

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 2025 to 31 December 2025 (**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 fourth 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 2025, Tri-Star's Australian operations included the following wholly owned subsidiary entities:

- Tri-Star Admin Pty Ltd
- Utopia Resources Pty Ltd (formerly 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 Otway 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 America Trading Company
- Tri-Star Australia Holding Company
- Tri-Star Petroleum 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 and the Northern Territory. 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 2025, Tri-Star held the following assets:

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

  Petroleum and Coal
  - *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*
  - *Ore Mountains project*, Saxony, Germany

- 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)
  - *Arckaringa project,* South Australia (wholly owned by Unleash Energy Pty Ltd)
  - *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
  - *EP 134*, Northern Territory (wholly owned by Peak Helium)
  - *Fairview project*, Queensland (Santos operated joint venture between GLNG Parties and APLNG)
  - *Lonesome and Membrance project*, Queensland (wholly owned by APLNG)
  - *Ramyard project,* Queensland (joint venture between APLNG and Santos)
  - *Roma East project*, 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 petroleum exploration company based in Queensland where Tri-Star holds an 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.

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 the country.

Workforce

During the reporting period, Tri-Star directly employed over 57 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 34% 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 and Custodians 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 and Custodians 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 2025, Tri-Star made all statutory and negotiated payments to Traditional Owners and Custodians and commissioned all necessary cultural heritage clearances before activities. Tri-Star continues to ensure all interactions and negotiations are in good faith to build long-term, mutually beneficial relationships and expects their contractors, supplies, and business partners to uphold these values.

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 to take steps to understand its exposure to modern slavery risks in its exploration activities. While of the global exploration industry presents a range of modern slavery risks, including high-risk on-site activities and complex supply chains, Tri-Star considers these risks to be mitigated by the early-stage nature of its operations and their predominant location in Australia, where strong governance frameworks and employee protections apply. Tri-Star also provides employee standards and benefits that exceed these requirements.

Tri-Star did not identify any actual instances of modern slavery in our operations or supply chain. As the business continues to grow, Tri-Star will continue to monitor these risks and engage with its suppliers to improve transparency and understanding of its broader supply chain, particularly where goods or inputs may originate from high-risk jurisdictions.

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 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

- Used the Ethixbase Modern Slavery platform to issue questionnaires to direct suppliers and assessed the modern slavery risks in the supply chain.
- Incorporated Ethixbase Modern Slavery due diligence tools into the supplier assessment process.

Further expanding modern slavery training initiatives

- Formally rolled out modern slavery training for both management and employees, providing information and practical tools to support the prevention of modern slavery risks in line with the organisation's commitment. This training has also been embedded into the onboarding process for all new starters to ensure ongoing awareness and compliance.

Internal modern slavery governance

- Monitored compliance of modern slavery policies and procedures.

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

In the 2026 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:

Conduct a review and revision of relevant policies and procedures

The following policies and procedures are due to be reviewed in 2026:

- 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 leverage the Ethixbase Modern Slavery platform to issue questionnaires to direct suppliers. Responses will be systematically reviewed to identify, assess, and prioritise modern slavery risks across the supply chain. Insights derived from supplier disclosures will inform risk ratings, enable targeted due diligence, and support the implementation of corrective actions where required.

Staff training

All new starters will be required to complete modern slavery training as part of the onboarding process. Training materials will be regularly reviewed and updated to ensure they remain current, relevant, and effective.

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 18 June 2026 and is signed by Andrew Hackwood, Chief Executive Officer – Australia.

Andrew Hackwood
CEO – Australia
Tri-Star E&P Pty Ltd
18 June 2026

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