KAROON ENERGY

2025 MODERN SLAVERY STATEMENT

CONTENTS

REPORTING ENTITY

Karoon Energy Ltd ("Karoon", the "Company") (ABN 53 107 001 338) is an international oil and gas exploration and production company, headquartered in Houston, USA and listed on the Australian Stock Exchange, with operated assets in the Santos Basin, Brazil and non-operated assets in the US Gulf Coast, United States. Our purpose is to provide energy safely, reliably, and responsibly, and create lasting benefits for all stakeholders.

Karoon's Modern Slavery Statement has been developed under the frameworks and obligations outlined in the Australian Modern Slavery Act 2018. The statement covers the activities of Karoon, and its subsidiaries listed in the table for the reporting period 1st January 2025 to 31st December 2025. Although Karoon Peru Pty Ltd and KEI (Peru Z38) Pty Ltd are still listed as subsidiaries for reporting purposes, these entities do not have any active operations.

All financial amounts quoted in this report are US dollars.

TABLE 1: COMPANY AND ENTITIES/SUBSIDIARIES (AS AT 31 DECEMBER 2025)

Karoon Energy Ltd	Australia	Active
Unlisted subsidiaries of Karoon Energy Ltd		
Karoon Energy International Pty Ltd	Australia	Active
Karoon Gas Browse Basin Pty Ltd	Australia	Active
Karoon Gas (FPSO) Pty Ltd	Australia	Not Active[1]
Unlisted subsidiaries of Karoon Energy International Pty Ltd		
KEI (Brazil Santos) Pty Ltd	Australia	Active
Karoon Peru Pty Ltd	Australia	Not Active[1]
KEI (Peru Z38) Pty Ltd	Australia	Not Active[1]
Karoon Energy North America Holdings Pty. Ltd	Australia	Active
Unlisted subsidiaries of KEI (Brazil Santos) Pty Ltd		
Karoon Petróleo & Gas Ltda	Brazil	Active
KEI Finance 1 Pty Ltd	Australia	Active
Unlisted subsidiaries of Karoon Energy North America Holdings Pty. Ltd		
Karoon Energy North America Group Inc. (Delaware C-Corp)	United States	Active
Subsidiaries of Karoon Energy North America Group Inc.		
KUSA Inc. (Delaware C-Corp)	United States	Active
Karoon USA Finance Inc (Delaware C-Corp)	United States	Active
Karoon Energy Management Inc (Delaware C-Corp)	United States	Active

1. 'Not Active' refers to group companies that are dormant and not currently engaged in any material activities within the group.

MESSAGE FROM OUR CHAIRMAN, CEO & MD

PETER BOTTEN
Chair

CARRI LOCKHART
CEO and Managing Director

On behalf of the Board of Karoon Energy Ltd (Karoon), we are pleased to present Karoon's Modern Slavery Statement for the period 1 January 2025 to 31 December 2025. This statement outlines the actions taken during the reporting period to identify, assess and address modern slavery risks in our operations and supply chains and has been developed in accordance with the requirements under *Australia's Modern Slavery Act 2018* (Cth).

Modern slavery remains a significant global issue that can occur across a wide range of industries and geographies. Karoon maintains a zero-tolerance approach to modern slavery and is committed to conducting business in a manner that respects human rights and the dignity, safety and freedom of workers, communities and those within our supply chain.

As an international energy company with operations in Brazil and the USA, and a global supplier base, we recognise the importance of ongoing diligence, transparency and collaboration to address modern slavery risks. During 2025, we continued to strengthen our understanding of these risks, building internal capability, strengthening engagement with our suppliers and enhancing the systems used to identify and reduce potential risks. This included our first independent assessment of a carbon credit project in Brazil, which supplies verified credits for our Scope 1 and 2 carbon neutral commitment.

No instances of modern slavery were identified within our operations or directly contracted suppliers during the reporting period. However, we recognise that risk remains and we remain committed to continuous improvement, including strengthening supplier engagement, risk assessment processes and grievance mechanisms.

This statement has been approved by the Board of Karoon Energy Ltd.

KAROON'S BUSINESS STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

BUSINESS STRUCTURE

Karoon is listed on the Australian Stock Exchange and has its global head quarters in Houston, United States (USA), with offices in Melbourne, Australia, and Rio de Janeiro, Brazil, as well as a principle shore base located in Itajaí, Brazil, supporting operations in the Santos Basin.

As at 31 December 2025 Karoon had 167 permanent employees across our offices and operations, of which 42% were women and 58% men, consistent with 2024. In 2025, both production assets were operated by service providers through contractor and sub-contractor agreements, in collaboration with Company representatives.

KAROON'S OPERATIONS

BRAZIL

The Baúna Project, located in the Santos Basin approximately 220km offshore Brazil, comprises the Cidade de Itajaí floating production, storage and offloading (FPSO) facility servicing the Baúna, Patola and Piracaba producing oil fields.

The Baúna Project is under Karoon's overall operational control. On 30 April 2025, Karoon completed the acquisition of the FPSO, assuming direct ownership of the facility. However, FPSO operations and management continued to be delivered under a Transition Services Agreement (TSA) with Altera & Ocyan A&O, the incumbent operator, to maintain operational responsibilities through 2025. Under this structure A&O continues to provide operations and maintenance services to ensure continuity and stability of offshore production.

This arrangement enables Karoon to progressively build internal capability and prepare for the transfer of full operational control to Karoon and a new long-term FPSO operations and maintenance model, expected to be implemented in mid-2026.

Through ownership of the FPSO, during 2025 Karoon has increased oversight and governance of asset performance, integrity and maintenance strategy, while day-to-day offshore operations remain contractor-executed during the transition period. Specialist contractors continue to support offshore activities, including FPSO operations and maintenance, catering and accommodation services, and logistics support (helicopter and marine vessel services). These services are managed under contractual arrangements which aim to ensure safe, reliable and continuous operations.

Given the reliance on contractors and offshore service providers, the Baúna Project also presents potential exposure to modern slavery risks within the supply chain. Karoon manages these risks through its contractor onboarding, due diligence and procurement processes, including assessment of suppliers against modern slavery criteria, incorporation of contractual obligations relating to labour standards, and ongoing monitoring of high-risk vendors. These controls are applied consistently throughout the transition period and will continue to be embedded as Karoon assumes full operational responsibility from 2026.

Also, within Brazil, Karoon has entered into three 5 to 8 year, off-take contracts to purchase verified carbon credits. These credits are sourced from large, reputable, carbon project developers and independently verified by Verra. Carbon credits are used to fully offset Karoon's Scope 1 emissions.

UNITED STATES

Karoon's US operations comprise non-operated equity interests in the Who Dat, Dome Patrol and Abilene producing fields, together with adjacent offshore exploration permits at Who Dat East, South and West, in the US Gulf of Mexico. The Who Dat West lease was relinquished in late 2025. Exploration activities were progressed across these permits during 2025, including well planning and drilling activity to evaluate prospective resources.

The Who Dat asset is operated by Karoon's joint venture partner, LLOG Exploration Company LLC (LLOG). As a non-operator, Karoon does not exercise operational control over the asset and its associated supply chain decisions, with operatorship responsibilities remaining with LLOG.

During 2025, Karoon transitioned a number of key management roles to Houston, USA, which is now Karoon's Company headquarters. Karoon's direct controlled entities in the United States include its wholly owned subsidiary, KUSA Inc., encompassing its Houston-based office activities and direct supplier relationships managed by KUSA Inc.

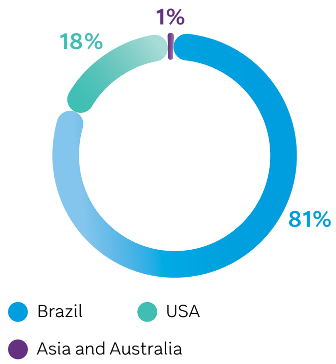
While Karoon does not exercise operational control over non-operated assets, it maintains oversight through joint venture governance arrangements and internal risk management processes. In 2025, Karoon enhanced its modern slavery reporting approach to include its proportionate share of supply chain expenditure associated with its non-operated assets, accounted for on an equity interest basis. This approach improves transparency of supply chain exposure and supports a more comprehensive assessment of modern slavery risk across US operations.

SUPPLY CHAIN

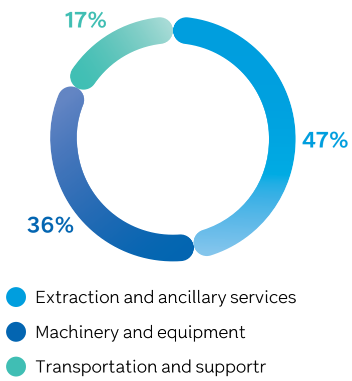
Modern slavery risk within Karoon's supply chain is calculated based on annual spend, including operated and non-operated asset expenditure on an equity basis, excluding taxes, interest payments insurance and royalties. In 2025, 365 suppliers were mapped, more than double the number in 2024 (170), representing 99% of supplier spend in each of Karoon's operational markets. Total spend in the US increased in 2025, due to expanded reporting scope, while spend in Brazil also increased with the one-off purchase of the Baúna CDI FPSO in April 2025 and a significant offshore maintenance campaign at the start of 2025.

Operations in Brazil remained the primary area for supplier spend (81%), while spend in the US (18%) increased significantly. Suppliers located in Europe, Asia and Australia combined accounted for less than 1%. In 2025, Operational support services in extraction and ancillary services remained the largest spend (47%), machinery and equipment spend increased significantly (36%), due to the one-off purchase of the Baúna FPSO and transportation and support increased slightly (17%).

Supplier Location % of Spend



Spend by Sector (US$m)



RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Modern slavery is defined by the International Labour Organisation (ILO)[1] as *'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.'*[1]

Modern slavery remains a significant global human rights issue, with an estimated 49.6 million people living in conditions of modern slavery on any given day. This includes approximately 27.6 million people in forced labour and 22 million in forced marriage. Modern slavery occurs across all geographical regions, industries, and economic sectors, particularly remote areas, and involves situations where individuals are exploited and unable to refuse or leave due to coercion, threats, deception, or abuse of power. These conditions encompass a range of practices, including human trafficking, forced labour, debt bondage, servitude, forced marriage, and forms of child labour.

While modern slavery can occur in any industry or geography, certain contexts present higher risk. Key drivers that may increase the likelihood of modern slavery risks within Karoon's operations and supply chains include:

- Industry characteristics
- Nature of products and services
- Geographic location of operations and suppliers
- Remoteness and isolation of operational sites

Karoon employs systems and checks which consider these higher likelihood factors, to better focus its assessments.

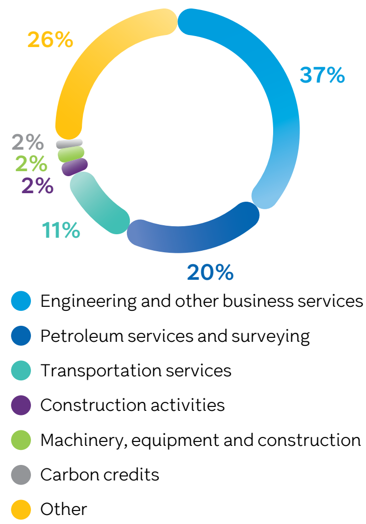
INDUSTRY RISKS

Karoon recognizes the importance of maintaining safe operations monitoring human rights and modern slavery risk in our operations and supply chain. The offshore oil and gas industry presents a number of inherent modern slavery related risks due to the industry's reliance on complex, multi-tiered supply chains, labour intensive activities and operations in geographically remote areas.

Worldwide oil and gas industry specific risk factors may include the use of third-party labour hire and crewing agencies, the prevalence of multinational crew, and the potential for excessive working hours, poor living conditions, recruitment fees, or restrictions on worker movement. In addition, the global nature of the oil and gas supply chain means that goods and services may be sourced from regions with varying levels of labour protections and regulatory oversight.

In Karoon's case, the nature of our operations, taking place predominantly offshore, in addition to the high reliance on contractors, local and temporary working arrangements creates a working environment where the risks of modern slavery can be a factor. Understanding modern slavery risk within our supply chain and maintaining robust controls to reduce this risk as well as mechanisms for reporting are essential parts of Karoon's governance process.

Risk by Supplier Sector



PRODUCT AND SERVICES RISKS

Karoon recognizes the potential for modern slavery within our supply chain, predominantly upstream in the procurement of goods and services. Karoon's upstream suppliers are primarily in sectors supplying operational support services, vessel hire, fuel and industrial chemicals, construction and maintenance services, plant, equipment and parts. By sector and spend, 91% of tier 1 risk is in Brazil and 9% in the USA.

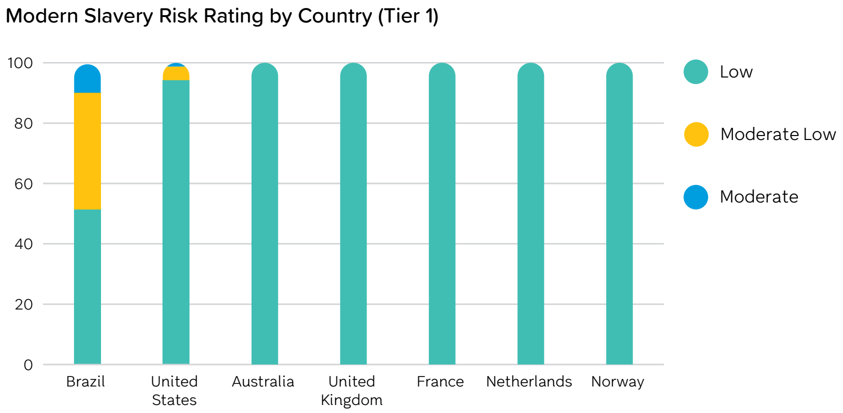
GEOGRAPHIC RISKS

While modern slavery is a global concern, the level of risk can vary considerably depending on geographic location and the remoteness of operations. The risk of modern slavery can also be compounded by factors such as the level of governance, extent of regulatory frameworks, infrastructure and socio-economic conditions[2].

1. ILO Forced Labour Convention, 1930 (No.29)
2. https://www.walkfree.org/global-slavery-index/

As an offshore oil and gas company working with large, reputable partners, our exposure to modern slavery risk is reduced. This is due to the typically higher standards of oversight, compliance, and operational control present in our industry and among our partners, as well as the nature of offshore operations which are generally subject to stricter regulatory and safety requirements.

The Brazilian Federal Government maintains a 'Dirty List'[1] of slave labour, which is updated twice a year and identifies individuals and organisations involved in modern slavery practices. As of the most recent update in January 2026, the list includes over 500 companies, primarily from the agricultural sector and other rural industries. Karoon has conducted extensive due diligence, and no entities within its supply chain appear on this list.



Hiwi REDD+ carbon project supported by Karoon

1. https://www.gov.br/trabalho-e-emprego/pt-br/noticias-e-conteudo

MODERN SLAVERY GOVERNANCE

GOVERNANCE

At a corporate level, sustainability issues and considerations, including modern slavery, are overseen by the Sustainability and Operational Risk Committee (SORC) which advises Karoon's Board on sustainability related decisions.

Karoon's corporate risk management system identifies potential risks and develops control measures for all areas of the business. Risks related to the business, suppliers, procurement and value chain are analyzed and managed under this system. Risk registers record identified risks and control measures both at a corporate level and under the management of business units. These risks are communicated to the Board regularly via the Sustainability and Operational Risk Committee (SORC) and the Audit, Risk and Governance Committee (ARGC), which is the primary body responsible for oversight on material risk to Karoon's business.

The SORC and ARGC also monitor actual events, where control measures have failed, and promote thorough investigation and corrective actions.

POLICIES

Karoon remains committed to embedding modern slavery considerations within our corporate governance framework. Our contract terms contain clauses to ensure compliance with relevant legislation and ethical labour practices; policies are regularly reviewed and new policies developed.

Our key policies addressing modern slavery risks include:

- **Human Rights Policy** – Affirming the Company's support of the UN Guiding Principles on Business and Human Rights (2011) and the Universal Declaration of Human Rights (1948).
- **Whistleblower Protection Policy** – Provides a mechanism for individuals to report concerns confidentially without fear of retaliation.
- **Speak Up Policy** – Encourages employees to identify, address and raise potential breaches
- **Karoon Energy Code of Conduct** – Outlines expectations regarding integrity, collaboration, and respect for human rights.
- **Health, Safety, Security and Environment (HSSE) Policy** – Affirms our commitment to workplace safety and security.
- **Sustainability Policy** – Establishes Karoon's zero-tolerance stance on human rights breaches and reaffirms commitments to international human rights frameworks.
- **Anti-Bribery, Fraud and Corruption Policy** – Strengthens internal controls against practices that may contribute to modern slavery.

Existing policies are regularly reviewed and updated to ensure they remain relevant and applicable to all stakeholders, including our suppliers. Karoon's efforts focus on increasing transparency, expanding supplier engagement, and deepening the Company's understanding of modern slavery risks across its operations and supply chains.

WHISTLEBLOWER AND GRIEVANCE MECHANISMS

Karoon maintains robust mechanisms for reporting concerns related to modern slavery. Karoon's 'Whistleblower Protection Policy' ensures that all suppliers, contractors, and employees have access to grievance channels via a third-party reporting service. Reports can be submitted anonymously via phone, web intake and mobile platforms or email in both English and Portuguese, with oversight from Karoon's General Counsel and the Chair of the ARGC.

No modern slavery-related grievances were reported in 2025, however Karoon acknowledges that the absence of reports does not eliminate the possibility of modern slavery within our supply chain.

In addition to Karoon's reporting mechanisms, the Brazilian Federal Government continues to operate the Ipê System, a national grievance platform for reporting modern slavery concerns anonymously. The United States of America State and Federal governments also provide various reporting channels, including the National Human Trafficking Hotline, which allows individuals to report suspected cases of forced labour and human trafficking.

SAFETY AND WELLBEING

Karoon prioritizes the safety of all personnel involved in operations under its control. Given the hazardous nature of our operations and industry, ensuring a safe work environment is a key focus of the Company's policies, governance structure and activities.

Karoon measures the effectiveness of its safety management controls in a number of ways, including Lost Time Injury Rate (LTIR) and Total Recordable Injury Rates (TRIR) per 200,000 exposure hours, and the number of High Potential Incidents, occupational injuries or illnesses.

These metrics form key components in corporate scorecards and remuneration structures and are embedded in the business as measures of safety performance.

Karoon and its contractors also utilize a range of measures and standards to promote worker safety and wellbeing, including:

- Facility and systems designed to eliminate or manage hazards to as low as reasonably practicable
- A comprehensive Karoon Operations Management System and operating standards and procedures
- In Brazil, offshore workers are rostered on a two- or four-week schedule, with processes in place to monitor shift times and durations
- Working hours are monitored using software systems reported to Karoon monthly
- Regular equipment inspections and safety audits on site are conducted throughout the year
- Workers receive safety training upon joining the Company, with training and skills updated regularly
- HSE advisers and support at Karoon operated locations

ACTION TAKEN BY KAROON TO MANAGE OUR RISK

MANAGING RISK

Karoon manages the risk of modern slavery through three key approaches:

1. By establishing long-term partnerships with reputable companies, as discussed in the industry risk and product and services risk sections above.
2. Through supplier risk assessments, using the Fair Supply™ platform and Brazilian Governments 'Dirty List'.
3. For larger or higher risk suppliers, through the use of self-assessment questionnaires (SAQ's) assessed through the Fair Supply platform or through direct audits.

Modern slavery risk can arise at different levels of a company's supply chain, commonly described in tiers.

- Tier 1 refers to suppliers directly engaged by and under a contractual relationship with Karoon. These suppliers are typically the most visible and easiest to engage.
- Tier 2 includes the suppliers of Tier 1 suppliers, such as manufacturers or processors that provide goods or components used in delivering products or services. Visibility at this level is more limited, and risks may increase depending on the nature of the work and location.
- Tier 3 extends further upstream to include the sourcing of raw materials and basic inputs, such as agriculture, mining, or primary production and typically has a higher inherent modern slavery risk due to factors such as labour-intensive practices, lower regulatory oversight, and the use of vulnerable or informal workforces.

In managing Karoon's risk of modern slavery, the Company has focused on the first three tiers, using the Fair Supply™ platform to assess risk across the Company's supply chain.

SUPPLIER RISK ASSESSMENTS

Karoon uses the Fair Supply™ platform to undertake Modern Slavery Risk Assessments (MSRA's), which assesses modern slavery risk using a data-driven, multi-tier model that maps procurement spend across industries and geographies to estimate exposure to forced labour risks. The platform combines global datasets, including international labour statistics, trade data and known risk indicators, with a multi-regional input–output (MRIO) economic model to trace supply chain linkages and identify where goods and services are likely sourced from. Risk is then quantified and based on factors such as industry risk, country risk, and spend in each category, generating a 'risk intensity' score expressed as the estimated number of people potentially subject to modern slavery per million dollars of spend.

This allows Karoon to understand broadly where risk exists in our supply chain and to prioritise higher-risk areas, even where direct visibility may be limited, supporting targeted due diligence and mitigation efforts.

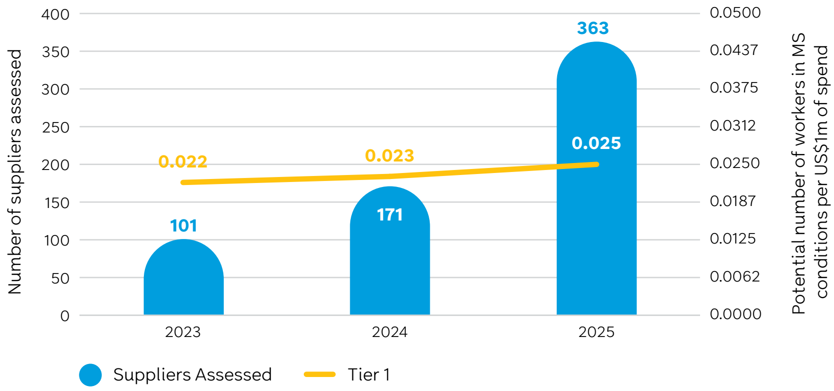
The number of suppliers assessed in 2025 increased to over 360 compared with 170 in 2024, representing 99% of suppliers by spend for both the US and Brazil. The increase in suppliers assessed was primarily due to an increase in exploration and maintenance activity in both North American and Brazil.

Native seed sorting for replanting as part of the Carbon Horizon Project

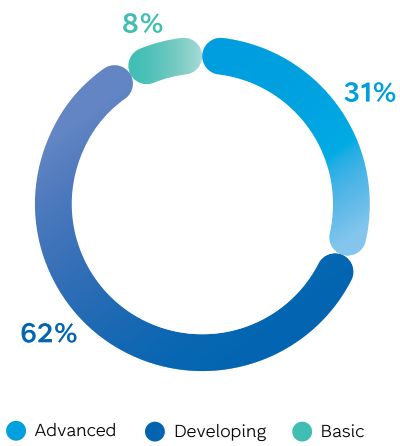
Key insights for 2025:

- The estimated number of people at risk of forced labour in Karoon's supply chain per million dollars of spend, increased slightly for Tier 1 in 2025 to 0.025 versus 0.023 in 2024, and 0.037 in 2025 versus 0.036 in 2024 for Tier 3. This is largely was due to increased spend in support activities associated with exploration and maintenance and increased purchase of carbon credits that have a slightly higher assessed risk.
- In 2025, 50% of estimated risk was split across four companies comparable to 2024, with all four companies completing SAQ's in the last two years.
- 100% of the suppliers assessed were rated moderate or lower in terms of risk (1 supplier representing <0.1% of total spend rated moderate-high).

Modern Slavery Risk Assessment (MSRA) 2025



Supplier Self-Assessment Questionnaire 2025



1. Self-Assessment Questionnaire (SAQ), suppliers are categorised by mitigation scores as follows:
   - Advanced: Mitigation Score above 70%.
   - Developing: Mitigation Score between 30% and 70%.
   - Basic: Mitigation Score under 30%.

SUPPLIER SELF-ASSESSMENT QUESTIONNAIRES (SAQ'S)

Supplier risk assessments rely on sector and country level data, and therefore have limitations in differentiating between individual suppliers operating within the same industry or market, regardless of their specific practices or controls. Due to this limitation, Karoon undertakes a more targeted assessment of key suppliers based on spend and potential risk.

These questionnaires request suppliers to provide details of their business, including business structure, internal policies and processes, supply chain transparency (including Tier 2 supplier locations), employee training, audit mechanisms (both internal and external), and employee entitlements. The SAQ's are designed to capture more detailed insights into workforce conditions, employment practices, and modern slavery mitigation measures within supplier operations and assign a rating based on their level of maturity. Based on this rating, Karoon can determine how best to engage with the supplier in future.

Combined with Karoon's MSRA process, the SAQ's allow the Company to gain a deeper understanding of key supplier risks and identify future opportunities for improvement.

Key insights for 2025:

- 50% of suppliers, by spend, completed SAQ's in 2025, with a total of 33 suppliers having completed SAQ's in the last 2-years.
- No suppliers had a risk rating higher than 'moderate'.
- Of suppliers assessed in 2025, four were advanced, eight were developing and one was basic.
- 19 suppliers were assessed as either 'advanced' (6) or 'developing' (13) MS risk mitigation processes.
- Four companies assessed had risk ratings below their industry average when their SAQ's were assessed, highlighting the quality of suppliers Karoon is working with.

AUDITS

Karoon will, from time to time, undertake physical audits of suppliers, where it is deemed that there may be an increased potential risk associated with the service they provide, or the service is uniquely different to those Karoon is more familiar with. Audits will only be undertaken in partnership with the supplier and using a third-party auditor. Audits may include, physical site inspections, a review of labour documentation, and interviews with workers and local community representatives where appropriate.

In October2025, in coordination with one of Karoon's carbon credit suppliers in Brazil, Karoon undertook an independent on-site socio-environmental and labour audit of a project supplying verified carbon credits to Karoon.

No organisational, procedural or other indicators of modern slavery were identified. Worker interviews did not reveal any evidence of coercion, restriction of movement, withholding of wages, or other practices associated with modern slavery. Mandatory employment records were largely in place, personal protective equipment was consistently used, and occupational health and safety procedures were well established. The project also demonstrated that a structured stakeholder engagement and transparent communication strategy with surrounding communities was being applied.

SOCIAL AND COMMUNITY

Karoon also has an opportunity to educate and advocate for social change as part of our ongoing social and community projects in Brazil. In 2025 Karoon invested US$2.5m through voluntary and incentivised community programs, these programs are selected based on Karoon's Community Investment Guidelines, which are based on the United Nations Sustainable Development Goals (UN SDG's), including gender equity, education and reduced inequalities.

Karoon's support of these projects, seeks to advocate for and support equality, human rights, ethics and education in the communities in which we operate. Details on the social projects supported by Karoon can be found in our 2025 Sustainability Report.

CARBON SEQUESTRATION PROJECTS

An important aspect of Karoon's activity in Brazil are the Company's Nature Based Solutions (NBS) carbon sequestration investments.

Each year Karoon purchases carbon credits from avoided deforestation and forest degradation (REDD+) projects in Brazil and Peru and an Afforestation, Reforestation, and Revegetation (ARR) project, also in Brazil. These credits are used to fully offset the Company's Scope 1 emissions.

Given the nature of these projects, their operation in the agriculture sector and, often, more remote locations, Karoon applies significant legal, regulatory, social and environmental due diligence prior to entering off-take agreements with providers. This includes entering into long-term agreements rather than purchasing from spot markets, to improve transparency and engagement with the project developers. Karoon also monitors the Brazilian Federal Government's 'Dirty List' of companies, to ensure that no companies involved in carbon sequestration initiatives are listed and as previously noted, undertook a physical audit on one of the contracted projects in 2025.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Since Karoon's first Modern Slavery statement was issued in 2021, the Company has continued to expand its governance framework and policies, as well as maturing the systems used to monitor and assess the risk of modern slavery within Karoon's supply chain. Over Karoon's five years of reporting, there have been no cases of modern slavery reported through our Whistleblower hotline or other means, and no instances have been identified through the risk assessments undertaken on our supply chain.

Karoon engages with internal stakeholders through meetings, workshops and training, and with external stakeholders through vendor pre-qualification requests and self-assessment questionnaires in pursuit of continuous improvements to its modern slavery strategy and reporting framework.

Karoon is independently benchmarked and scored across multiple independent Environment, Social and Governance (ESG) assessment and rating organisations. These platforms provide context for Karoon to seek industry best practice and identify areas in need of strengthening. In 2025 the Company expanded this to include the Carbon Disclosure Project (CDP) and S&P agencies, with a focus on increasing our transparency and engagement with our value chain.

2025 data indicated a slight increase in Karoon's supply chain Tier 1-3 risk using the Fair Supply platform, compared to the previous year. This increase was mainly due to the increased use of operational support services which have an inherently higher potential for modern slavery, for example the use of catering services associated with offshore maintenance activity. Supply chain risk, as assessed using our targeted main supplier SAQ's, reduced overall in 2025, with an increase in companies assessed as mature in their management of modern slavery risks.

PROCESS OF CONSULTATION

Internally, Karoon undertakes communication and consultation across business units to ensure key personnel are engaged and informed on pertinent issues related to ethics and modern slavery risk. During 2025, this was achieved through workshops undertaken with Karoon's sustainability and procurement teams, as well as discussion of the results of the carbon project audit.

In addition, Company representatives are present across all work sites operated by Karoon, to monitor health and safety performance, and that appropriate working conditions are maintained.

The Company has assessed additional measures to maintain and improve awareness, understanding and integration of modern slavery issues and strategy throughout the business, with the intent to integrate modern slavery awareness and training into the Company's online training portal.

CONTINUOUS IMPROVEMENT

Karoon takes a continuous improvement approach in its efforts to understand and reduce Modern Slavery risk in its supply chain, aligning with the requirements outlined in the *Modern Slavery Act* (2018) (Cth) ("Modern Slavery Act").

Since Karoon's first Modern Slavery statement in 2021, the Company has continued to build a robust framework, including the introduction of a Human Rights policy in 2024 to support existing Whistleblower, Code of Conduct and Anti-Bribery, Fraud and Corruption policies, which are core to Modern Slavery programs.

The table below provides a summary of Karoon's progress against its modern slavery plan in 2025. While several of Karoon's core initiatives were completed during the year, some remain in progress and are considered ongoing, annual activities. The priority for 2026 is to further deepen our understanding of our core supplier base and increase the number of suppliers engaged through our SAQ process.

THEME	ACTION	2024	2025	2026
Governance and Policy	Reviewed and aligned governance policies. Code of Conduct reviewed, Human rights and Freedom of Association policy combined and approved by Karoon's Board.	Complete		
	Establish a cross-functional working group to implement modern slavery strategy and due diligence throughout the organisation (sustainability, legal and procurement)	In Progress	Complete	
	Modern slavery awareness course available on Karoon's e-learning platform			Planned
Risk assessment, due diligence and audits	Review existing procurement processes to incorporate modern slavery compliance requirements for existing and new suppliers	In Progress	Complete	
	SAQ for top suppliers based on annual spend	Complete	Complete	Planned
	Annual desktop assessments to cover 99% of suppliers by spend	Complete	Complete	Planned
	Map and assess the potential exposure of suppliers beyond Tier 1 down to Tier 3	Complete	Complete	
Grievance mechanisms, response and remediation	Communicate actions/strategy internally for approval and present risks to the Board	Complete		
	Establish process for reporting modern slavery risks and incidents internally to executive committees and Board	Complete		
	Whistleblower channel to be posted in the FPSO, including basic information on modern slavery (how to spread awareness on available grievance mechanisms)	In Progress	Complete	
	Ongoing, industry collaboration (e.g. the Brazilian Business Council for Sustainable Development, external working groups, discussion forums with peers)	Complete	Complete	Planned
	Remediation plan available in the event of a modern slavery complaint or event in Karoon's operations or supply chain (investigation, follow up on incidents, engagement with other parties involved)	In Progress	Complete	
	On-site social compliance audit for Carbon Projects		Complete	Planned