

Modern Slavery Statement 2020

This is the first statement made by Tokyo Gas Australia Pty Ltd (the Company) in accordance with the *Modern Slavery Act 2018* (Cth) and sets out the steps taken by the Company during its financial year ending 31 December 2020 to identify and to mitigate the risk of slavery and human trafficking taking place in our business and its supply chains.

1. Reporting Entity

The Company is a wholly owned subsidiary of Tokyo Gas Co. Ltd, (Tokyo Gas). Tokyo Gas is a Japanese utility company, listed on the Tokyo Stock Exchange, that supplies gas and is Japan's largest provider of city gas, serving more than 11 million customers for over 130 years, primarily in the Tokyo metropolitan area. Tokyo Gas' Head Office registered address is at 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan. The Company holds the following subsidiaries and invests in LNG project from through each subsidiary:

- Tokyo Gas Darwin LNG Pty Ltd (which holds a 3.066% interest in the Darwin LNG Project and associated infrastructure);
- Tokyo Gas Pluto Pty Ltd (which holds a 5% interest in the Pluto LNG Project and associated infrastructures);
- Tokyo Gas Gorgon Pty Ltd (which holds a 1% interest in the Gorgon LNG Project and associated infrastructures);
- Tokyo Gas QCLNG Pty Ltd (which holds a 1.25% interest in the Pluto LNG Project and associated infrastructures);
- Tokyo Gas Ichthys Pty Ltd (which holds a 1.575% interest in the Ichthys LNG Project and associated infrastructures); and
- Tokyo Gas Ichthys F&E Pty Ltd (which holds a 1.575% interest in the Permit 285-P).

The Company's principal place of business is in Western Australia with its offices located at Exchange Tower Level 28, 2 The Esplanade in Perth

The primary activities of the Company are investment and participation in various joint ventures that own and operate the LNG projects for the production and supply of liquefied natural gas and condensate for export, and the production and supply of domestic gas for sale within Australia. The Company is not an operator of the projects, rather, participates as a minority joint venture partner. Further details are here:

- Darwin LNG Project (<https://www.santos.com/what-we-do/five-core-assets/northern-australia-and-timor-leste/>). Darwin LNG is operated by Santos Limited and its affiliates.
- Pluto LNG Project (<https://www.woodside.com.au/what-we-do/australian-operations/pluto-lng>). Pluto LNG is operated by Woodside Burrup Pty Ltd.

- Gorgon Project(<https://australia.chevron.com/our-businesses/gorgon-project>). Gorgon Project is operated by Chevron Australia Pty Ltd.
- QCLNG Project(<https://www.shell.com.au/about-us/projects-and-locations/ggc/about-ggc.html>). QCLNG is operated by QGC Pty Limited and its affiliates.
- Ichthys LNG Project(<https://www.inpex.com.au/projects/ichthys-lng/>) Ichthys LNG is operated by INPEX Operations Australia Pty Ltd and its affiliates.

2. Our supply chain

The Company, invests and participates in five LNG projects in Australia. With the exception of the Gorgon Project, each project's operator deals with the export of liquified natural gas and with suppliers in the industry in the general course of business, including shipping and insurance. The Company retains professional advisers in areas such as legal, technical, accounting and tax. The Company does sell its participating interest share of LNG from the Gorgon Project, to its parent company in Tokyo, Tokyo Gas. The Company purchases information technology equipment from iQuest, which is Australian based company and office supplies and services from various suppliers mainly from local companies. Due to the nature of our business, purchases form only a minor part of our business.

3. Actions taken to assess and address the risks

a. Implementation of Modern Slavery Framework

The Company has implemented a Modern Slavery Framework. The Framework establishes the business organisation structure and the overall processes in respect of modern slavery and human trafficking, and a workflow outlining responsibilities along with relevant leadership functions and accountability.

The Framework sets out a risk assessment procedure adopted, including supplier checks and development of a method for assessing and identifying potential risk suppliers based on international guidelines (such as the Global Slavery Index), as well as a method for assessing risks in operations in conjunction with the operators. Lastly it deals with risk mitigation actions to be taken in case of risks being identified in relation to suppliers or operations, and outlines education and training to be conducted.

Recognising that the management of risk cannot be effectively addressed by one function only, a cross functional working group has been set up. They meet regularly to review progress on an action plan, risk assessment and due diligence processes.

Although this is the Company's first MSS, the working group is planning to assess the effectiveness of the Framework on an annual basis to see if improvements may be made to the process.

b. Risk Assessment in FY2020

The Company has considered its supply chain and operations and having reviewed and evaluated those, we have in 2020 identified two types of risks for focus.

In respect of potential supplier risk, upon conducting an initial and high-level assessment of suppliers, we investigated and sent questionnaires regarding MSA risks to 5 suppliers out of our 115 direct suppliers. The survey identified a very small number of risks based on responses.

The Company also actively sought and obtained each of its operators' MSA Statement to review from the perspective of adequacy as a project participant. Going forward, in respect of operational risks, the Company has planned further engagement with the operators of its projects, to assess MSA risks and compliance in operations. The Company will seek improvements if the necessity is identified and will work with its operators to ensure the risks are adequately identified, assessed and appropriate mitigations taken.

c. Risk Mitigation in FY2020

Training has been conducted for staff responsible for supplier checks, vendor engagement and purchasing decisions for the business as to the MSA and the Framework.

While recognising that the Company has limited ability to influence major project supply chains or engage with the various operators' suppliers, as noted above, going forward, we will seek further information and data in this respect.

Our Shareholder, directors, and the leadership team have participated in Modern Slavery information sessions and the Company has held separate awareness training for all staff during the year.

We will set further actions in our Employment Policy Manual to further guide how we do business and shape the standards we set for our staff and others and the way we behave. Our Employment Policy Manual includes policies to support equal opportunities, and against bullying and harassment and whistle-blower protections, which is available to all employees

and contractors, to report any instances or suspicions of unethical behaviour, including potential modern slavery related issues.

4. Assessing the effectiveness of actions

The implemented Framework establishes a process for engagement between key business areas of procurement, commercial and legal via the Working Group, which engagement tasks include review and assessment of the Framework's effectiveness across our business at the end of each year.

The leadership also conduct year-end reviews as a part of the annual disclosure review process for this Modern Slavery Statement and on its recommendation, this review is endorsed by our Board in assessing the appropriateness of our frameworks, systems, the Employment Policy Manual and the Company's performance.

5. Any other relevant information

As our awareness of the issues grow, we are committed to improving our processes to ensure that we adapt appropriately and capture any risks as effectively as possible. A future action plan is to be prepared for assessment of further improvements in actions in the following years

6. Process

The board of directors of the Company has approved this Statement at its meeting on 22 April, 2021.

Signed for and on behalf of the Company



CEO

Tokyo Gas Australia Pty Ltd