

## Statement on Modern Slavery 2024

JERA Australia Pty Ltd (JERAAU) makes this statement on modern slavery for the financial year ended 31 December 2024 in accordance with the *Modern Slavery Act 2018* (Cth). The statement is made on behalf of JERAAU and its subsidiaries, as detailed below. This statement sets out the steps taken to minimise the risk of modern slavery and human trafficking taking place in JERAAU's business operations or supply chains. This statement has been approved by JERAAU's Board of Directors.

### 1. Introduction

JERAAU recognises that modern slavery is a crime. Furthermore, JERAAU acknowledges that modern slavery is morally reprehensible acts that deprive a person's liberty and dignity for another person's gain. JERAAU understands that it is a serious problem for millions of people around the world, including both in developed and undeveloped countries. JERAAU further understands that there are various forms of coercion, exploitation and deception and that all organisations face challenges in minimising the risks to their operations associated with suppliers not properly mitigating their modern slavery risks.

JERAAU is committed to taking steps to prevent slavery and human trafficking in its operations and supply chains, as outlined in this statement. This statement sets out the actions that JERAAU has taken to understand potential modern slavery risks related to its business, and to implement steps to prevent slavery and human trafficking during the financial year 2024.

### 2. The Reporting Entity - JERAAU

JERAAU is a company incorporated in Australia and is wholly owned by JERA Co., Inc. (JERA). JERA was established on 30 April 2015 by the consolidation of the fuel and thermal power departments of the Tokyo Electric Power Company (as it was then known) (TEPCO) and the Chubu Electric Power Company (Chubu). Its two shareholders are both listed on the first section of the Tokyo Stock Exchange. TEPCO has its headquarters in Tokyo, Japan. Chubu has its headquarters in Nagoya, Japan.

As at 31 December 2024, JERAAU has the following 100% owned subsidiary companies: JERA Darwin Investment Pty Ltd, JERA Darwin LNG Pty Ltd, JERA Gorgon Pty Ltd, JERA Barossa Pty Ltd, JERA Ichthys Pty Ltd, JERA Exploration Ichthys Pty Ltd, JERA Scarborough Pty Ltd and Chubu Electric Power Integra Pty Ltd. For the purpose of this statement these companies are collectively referred to as JERAAU Subsidiaries. JERAAU Subsidiaries have no staff. JERAAU's staff perform all functions on behalf of JERAAU Subsidiaries. JERAAU's registered office is in Perth, Western Australia.

With the exception of Chubu Electric Power Integra Pty Ltd, each JERAAU Subsidiary owns a minority participating interest share in an LNG project in Australia. The LNG from each project supplies LNG to Japan and contributes to energy stability in Japan. These projects are Darwin LNG, Gorgon, Ichthys, Barossa and Scarborough (the Projects). JERAAU's focus is on technical and safety aspects and providing project information to JERA to ensure a stable supply of LNG to Japan.

### 3. Structure, Operations and Supply Chains

JERAAU operates out of its registered office in Perth, Western Australia. JERAAU staff are employed, contracted by or seconded to JERAAU. JERAAU provides services to each of its affiliate companies to manage its assets as well as being responsible for office support services such as office space, desks, telecommunications equipment, computing services as well as cleaning, IT support services and insurance.

JERAAU's day to day activities on the asset side are non-operational and are limited to participating in management meetings and monitoring production status. The operators of each of the Projects are responsible for procurement activities and all operational matters. The respective operators have in place policies and procedures in relation to the mitigation of modern slavery risks.

As part of JERAAU's activities, JERAAU engages law firms, accounting firms, tax advisors and other professionals located in various locations. Given the limited nature and narrow focus of its commercial activities, JERAAU considers the risks of modern slavery in its supply chains to be low.

#### **4. Modern Slavery Risks in its Supply Chains**

JERAAU has considered the risks that it may cause, contribute or be directly linked to modern slavery practices. The key risk identified for JERAAU is that it engages a supplier that is involved in modern slavery. This is considered a very low risk due to JERAAU's limited direct dealings with suppliers and the nature of the suppliers JERAAU does engage. JERAAU's engagements are generally as described in the above paragraph. Furthermore, JERAAU's procurement process includes some risk-based screening of suppliers for potential involvement in modern slavery practices.

There is also a risk of JERAAU being indirectly involved in modern slavery as a result of a joint venture operator engaging a supplier who is involved in modern slavery practices. We have considered this risk and determined any risk to be low due to the terms (governed by contract) of the joint venture relationships. Further, JERAAU undertakes due diligence to ensure each operator has policies and practices in place to prevent involvement in modern slavery. This includes reviewing the operator's annual modern slavery statement and raising any potential issues relating to modern slavery at operating committee meetings.

Another identified risk for JERAAU is entering into a joint venture or a business relationship with an entity that is directly or indirectly involved in modern slavery practices. This is also considered a low risk due to the small number of joint ventures JERAAU is a party to and the due diligence undertaken by JERAAU prior to entering into a new relationship, including external legal review.

#### **5. 2024 Actions Taken to Address Risks**

JERAAU actively seeks to minimise the risks set out above and promote ethical business practices that protect workers in the organisations and supply chains that it has contact with. In 2024, JERAAU had in place the following measures to minimise the likelihood that it could cause, contribute to or be directly linked to modern slavery practices:

- Policies and a code of conduct (The Way We Work Policy) that set out the standards of behaviour JERAAU employees, contractors and secondees must comply with. This includes obeying all relevant laws and complying with business ethics.
- All JERAAU employees, contractors and secondees are required to undertake annual legal compliance training, which includes awareness of relevant laws and international standards, and must familiarise themselves with all JERAAU's policies and procedures. Each year JERAAU also reviews Walk Free's Global Slavery Index to maintain staff awareness of modern slavery issues and the main sources of modern slavery.
- An annual compliance program which is aimed at ensuring employees, contractors and secondees comply with JERAAU's policies, procedures and code of conduct. The program includes compliance reviews and audits.

- A cross functional modern slavery working group which meets quarterly to embed practices to identify and avoid potential modern slavery violations in its operations and supply chains. The working group's purpose is to assess modern slavery risks for JERAAU, identify any mitigation actions required and to educate all staff on the risks of modern slavery and what action is required to address the risks. The working group has established key performance indicators (KPI's) for the actions and assesses the effectiveness of its actions at each meeting, as detailed in Item 6. below.
- The working group also provides training for all employees, contractors and secondees. In August 2024 the working group organised a modern slavery and human rights lunch and learn with Walk Free's Senior Advisor, Business and Government Engagement. Walk Free is an international human rights group dedicated to eradicating modern slavery in all its forms. The lunch and learn was compulsory for all employees, contractors and secondees and covered the definition of modern slavery, the requirements of Australia's *Modern Slavery Act 2018*, the key risk areas for energy and resource companies, supplier due diligence processes and some relevant case studies to increase awareness.
- Update to JERAAU's Board at its quarterly in-person meetings on JERAAU's modern slavery obligations, the risks and the current actions taken to address the risks.
- Consideration of modern slavery risks as part of JERAAU's quarterly risk review process, which is reported to the Leadership Team and the Board.
- JERAAU's Anti-Bribery and Corruption (ABC) and Whistleblower policies were reviewed and updated, with changes including a clearer process and more options for reporting any conduct, or suspected conduct, which is in breach of business ethics or legal obligations. The updated policies were implemented in October 2024, with training provided to all employees in December 2024.
- JERAAU's options for reporting misconduct were reviewed and in April 2024 JERAAU implemented an alternative, anonymous reporting option, which is hosted by an external provider.
- Frequent reviews of the conduct of the operators of its Projects to ensure awareness of the modern slavery requirements.
- The new supplier form was updated to include a 'legal requirements' section which requires the contract owner to consider any ABC or modern slavery risks associated with the supplier.
- JERAAU, in consultation with its office building management company, conducted a review of its cleaning contractor and the practices it has in place to identify and prevent modern slavery.

JERA also has a Group Human Rights Policy which was established in accordance with the international norms and social codes regarding human rights, including the Universal Declaration of Human Rights. This policy provides that the JERA Group, which includes JERAAU, will have absolutely no involvement in any kind of inhumane labour, including child labour, forced labour, overwork and non-compliance with the legal minimum wage. The policy is available here - [Human Rights Policy | Compliance | JERA](#)

## 6. Reviewing and Assessing Effectiveness

The modern slavery working group uses KPIs for each of the actions detailed in Item 5. above to measure how effective the identified actions are in identifying and addressing modern slavery in JERAAU's operations and supply chains. The working group assesses the effectiveness of the actions implemented at each quarterly meeting, and reports any gaps or opportunities for improvement to the Leadership Team. KPIs which were successfully met in 2024 include:



- 100% of new employees, contractors and secondees completed the legal compliance training induction;
- ABC and Whistleblower policies updated and implemented;
- An externally hosted anonymous whistleblowing platform implemented;
- Over 95% of all employees, contractors and secondees attended the annual legal compliance training, which covered modern slavery risks and included a knowledge check; and
- All members of the JERAAU Board aware of Australia's modern slavery obligations (due to quarterly updates at Board of Director meetings).

One of JERAAU's 2024 KPIs were not achieved in 2024 - implementation of a JERAAU human rights policy (based on the JERA Group Human Rights Policy). This will be further considered in 2025.

JERAAU is committed to the ongoing review of the effectiveness of its actions. To this end, JERAAU reported the actions taken, their effectiveness and the proposed actions for 2025 to the Board at its March 2025 meeting.

#### **7. Consultation Process with Subsidiaries**

All staff (employees, contractors and secondees) undertaking functions on behalf of JERAAU's Subsidiaries are engaged by JERAAU and have received legal compliance training, attend the modern slavery awareness sessions, and are involved in the quarterly risk identification and review process.

#### **8. Approval**

The Board of Directors of JERA Australia Pty Ltd has approved this modern slavery statement for the financial year ended 31 December 2024.

Date:

**Signed for and on behalf of JERA Australia Pty Ltd**

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Gaku Takagi  
Managing Director and Chief Executive Officer  
JERA Australia Pty Ltd