MidOcean Energy Australia
Suite 2001, Level 20, Gateway
1 Macquarie Place
Sydney, NSW 2000

Modern Slavery Statement 2024

This is the statement made by MidOcean Energy Parent 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 2024 ("**FY24**") to identify and mitigate the risk of slavery and human trafficking taking place in its business and supply chains. This statement has been reviewed and endorsed by the board of directors of the Company and the MidOcean Australia Subsidiaries (as defined below).

1. Reporting entities and consultation

a. Reporting entities

The Company qualifies as a reporting entity under the Modern Slavery Act 2018 (Cth). The Company is a subsidiary of MidOcean Energy, LLC, a Delaware corporation ("**MidOcean Energy**" or "**MidOcean**").

The Company wholly owns and controls the subsidiaries in Australia listed at Schedule 1 ("**MidOcean Australia Subsidiaries**") and invests in LNG projects in Australia through the following subsidiaries:

• MidOcean Pluto Pty Ltd (which holds a 5% interest in the Pluto LNG Project .and associated infrastructure);

• MidOcean Gorgon Pty Ltd (which holds a 1 % interest in the Gorgon LNG Project and associated infrastructure);

• MidOcean QCLNG Pty Ltd (which holds a 1.25% interest in the Queensland Curtis LNG Project and associated infrastructure),

("**Project Subsidiaries**"). The Project Subsidiaries are part of the MidOcean Australia Subsidiaries.

Among the MidOcean Australia Subsidiaries, the companies listed at Schedule 2 also qualify as reporting entities under the Modern Slavery Act 2018 (Cth) and are covered by this statement.

The registered address of the Company and the MidOcean Australia Subsidiaries is 1 Macquarie Place, Gateway Level 20, Sydney, New South Wales, Australia, 2000.

b. Process of consultation

Other than MidOcean Energy Parent 4 Pty Ltd and MidOcean Energy Holdings Pty Ltd, which are the primary operating companies for the MidOcean Australia Group, the MidOcean Australia Subsidiaries are all holding companies. The Project Subsidiaries are special purpose vehicles established for holding interests in the LNG projects and have no employees.

They all operate under the direction and governance of the Company. Consultation in relation to this statement has occurred among the directors of the Company and the directors of the MidOcean Australia Subsidiaries.

2. Our structure, operations and supply chains

The Company's primary activities are, through the MidOcean Australia Subsidiaries, investing and participating in various joint ventures that own and operate the LNG projects for the production and supply of liquefied natural gas ("**LNG**") and condensate for export, and the production and supply of domestic gas for sale within Australia. The Company and the MidOcean Australia Subsidiaries are not operators of the LNG projects, rather they participate in the projects as minority joint venture partners.

Further details about the LNG projects in which the Project Subsidiaries hold interests can be found in the links below:

- Pluto LNG Project (https://www.woodside.com/what-we-do/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/qgc/about-qgc.html). QCLNG is operated by QGC Pty Limited and its affiliates,

(“**MidOcean LNG Projects**”).

MidOcean and the Company are committed to protecting and providing fair treatment for all our workers. The Company employed 5 employees and, in addition, had 1 secondee from White & Case LLP (a global law firm) as of 31 December 2024. 3 of the 6 individuals worked at the Company's office in Perth, Western Australia, while the other 3 worked remotely, primarily from Queensland and Victoria. They all have been trained on, and are aware of, the importance of raising concerns about potential modern slavery, human trafficking or exploitation, including MidOcean’s whistleblowing policies which are incorporated into the Code (as defined below).

The Company invests and participates in the MidOcean LNG Projects in Australia through the Project Subsidiaries. Each project's operator manages and operates a MidOcean LNG Project and deals with suppliers of products and services used in the operation of that project, including equipment, engineering, construction, drilling, maintenance, IT and shipping. The Company monitors the operation of the MidOcean LNG Projects by the operators and retains professional advisers in areas such as legal, technical, accounting and tax for such monitoring purposes.

The Company also engages suppliers for its office administration, such as purchasing office equipment, IT support services, human resources and other various services. Due to the nature of the Company's non-operating business, those purchases form only a minor part of the business.

3. Modern slavery risks in the operations and supply chains

We conduct our business fairly, ethically and with respect to fundamental human rights. The businesses of MidOcean and the MidOcean Australia Subsidiaries are operated in Australia in compliance with Australia's laws and regulations. Our suppliers are predominantly based in Australia. Our operations and supply chains are generally considered to be at low risk of exploitation and modern slavery. However, we are aware that some industries or suppliers that we engage with may have higher risks of modern slavery practices and must be reviewed carefully.

4. Action taken to assess and address the risks

a. Adoption of Code of Conduct

In December 2024, MidOcean adopted a Code of Conduct ("**Code**") which applies to each of its subsidiaries, including the Company and all the MidOcean Australia Subsidiaries.

The Code provides how each of MidOcean’s subsidiaries, employees (including contract, agency or temporary workers), officers, and board members are expected to conduct themselves when on duty. MidOcean and the Company expect that all of contractors and their employees will act in a manner consistent with the Code. Failure to comply with the Code may result in disciplinary action, including dismissal. The Code provides that MidOcean opposes all forms of child labour, forced, bonded or compulsory labour, human trafficking and modern slavery in our own operations as well as in our supply chain. It also provides that MidOcean will comply with all applicable rules and regulations in this respect in any jurisdiction in which MidOcean is present.

b. Risk Assessment in FY2024

In FY2024, the Company analysed the modern slavery risks in its operations and supply chains using the following methods.

At the time of acquisition of its interests in the MidOcean LNG Projects, the Company conducted thorough due diligence (including regulatory and compliance due diligence) of the assets, the sellers and their supply chains and did not identify any modern slavery related red flags.

The Company also reviewed and analysed the latest Modern Slavery Statements of the operators of the MidOcean LNG Projects to assess the risks in the operations of Woodside Burrup Pty Ltd; Chevron Australia Pty Ltd and QGC Pty Limited. The Company did not find any modern slavery issues which it needs to ask the operators to address or to provide more detailed information about.

The Company sought to incorporate contractual measures with any new suppliers it engaged that included, among other things, undertakings in their engagement letters that the Company's suppliers comply with all applicable modern slavery laws and regulations, and that neither the supplier nor any of their suppliers or subcontractors engage in any modern slavery practices.

The Company will continue to commit to engaging with the operators and suppliers to assess the modern slavery risks and compliance with the relevant legislation in the operations and supply chains. The Company will seek improvements as necessary if any issues are identified through this process and will work with the operators and suppliers to ensure the risks are adequately identified, assessed and mitigated.

5. Assessing the effectiveness of actions

The Company's management team meets regularly to discuss a range of compliance related matters, including considering engagements with new suppliers and whether they operate in high-risk jurisdictions. However, as MidOcean and the Company's operations only commenced in FY2024, the Company is still developing its operating policies and procedures. It is expected that further compliance measures and procedures, including procedures to assess the effectiveness of the Company's modern slavery measures, will be developed further in future years as the Company's operations grow.

6. Any other relevant information

In FY2024, MidOcean, the Company and the MidOcean Australia Subsidiaries were in their first year of operations. Operations were formally established in March 2024 as the result of the acquisition from Tokyo Gas Australia Pty Ltd (the former owner of the Project Subsidiaries) of the interests in the MidOcean LNG Projects. As the MidOcean organisation continues to mature, the Company and the MidOcean Australia Subsidiaries will continue to develop and implement further measures to prevent the risk of any modern slavery occurring in connection with its operations.

In furtherance of this, MidOcean Energy adopted a Sustainability Policy in June 2025 which further outlines MidOcean's commitment to preserving human rights in alignment with the United Nations Guiding Principles on Business and Human Rights. Under the Sustainability Policy, MidOcean's approach to monitoring human rights includes (i) seeking to understand potential risks in relation to business development opportunities and current operations, (ii) seeking to strengthen internal programs when procedures ensuring the protection of human rights are found to be deficient, and (iii) striving to understand and investigate any human rights concerns (which include modern slavery, human trafficking and exploitation) within our own operations and those of our joint venture partners and customers.

7. Approval

The board of directors of the Company has approved this statement on behalf of the Company and the companies listed at Schedule 2 hereto.

This statement is signed by Benjamin Lee in his capacity as a Director of the Company.

____

Director
MidOcean Energy Parent Pty Ltd

Schedule 1 MidOcean Australia Subsidiaries

- MidOcean Energy Parent 2 Pty Ltd
- MidOcean Energy Parent 3 Pty Ltd
- MidOcean Energy Parent 4 Pty Ltd
- MidOcean Reef Parent Pty Ltd
- MidOcean Reef Bidco Pty Ltd
- MidOcean Mako Parent Pty Ltd
- MidOcean Energy Holdings Pty Ltd
- MidOcean Mako Holdco Pty Ltd
- MidOcean Gorgon Pty Ltd
- MidOcean Pluto Pty Ltd
- MidOcean QCLNG Pty Ltd
- 155 063 362 Pty Ltd
- 155 063 371 Pty Ltd

Schedule 2 MidOcean Australia Reporting Subsidiaries

- MidOcean Energy Parent 2 Pty Ltd
- MidOcean Energy Parent 3 Pty Ltd
- MidOcean Energy Parent 4 Pty Ltd
- MidOcean Mako Parent Pty Ltd
- MidOcean Energy Holdings Pty Ltd
- MidOcean Mako Holdco Pty Ltd
- MidOcean Gorgon Pty Ltd
- MidOcean Pluto Pty Ltd
- MidOcean QCLNG Pty Ltd