Shell Australia 2024 Modern Slavery Statement

Period January 2024 – December 2024
Published June 2025

Contents

1	About this Statement
2	Message from Shell Australia Chair
3	1. Reporting entity
5	2. Company structure, operations and supply chains
8	3. Assessing and identifying our modern slavery risks
10	4. Actions taken to address risks
13	5. Risk effectiveness
14	6. Report consultation
14	7. Other relevant information
15	Appendix
16	Appendix A
16	Appendix B

About this Statement

Joint Modern Slavery Statement (Statement under the Modern Slavery Act 2018 (Cth (Act for the reporting period 1 January 2024 to 31 December 2024.

Shell is opposed to all forms of modern slavery.

Such exploitation is against Shell's commitment to respect human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's 1998 Declaration on the Fundamental Principles of Rights at Work.

This is Shell's fifth published Statement under the Australian Modern Slavery Act setting out the steps we have taken against modern slavery in our business and supply chains.

Shell Energy Holdings Australia Limited (SEHAL) has prepared this Statement in consultation with each of the following reporting entities, and is published by the following reporting entities in compliance with the Act:

Relevant subsidiaries of Shell plc
Shell Energy Holdings Australia Ltd, Shell Australia Pty Ltd, Shell Energy Environmental Products Australia Pty Ltd, Shell Energy Australia Pty Ltd, Shell Energy Operations Pty Ltd, Shell Energy Retail Pty Ltd, Powershop Australia Pty Ltd, QGC Upstream Holdings Pty Ltd, QGC Upstream Limited Partnership, QGC Upstream Investments Pty Ltd, QGC Pty Ltd, Condamine Power Station Pty Ltd, QGC Midstream Holdings Pty Ltd, QGC Midstream Investments Pty Ltd, QGC Train 1 Tolling Pty Ltd, QGC Train 2 Tolling Pty Ltd, QGC Train 2 Tolling No.2 Pty Ltd, QGC Train 1 Pty Ltd, QGC Train 2 Pty Ltd, QGC Common Facilities Company Pty Ltd, (collectively "Shell", "our" or "we")

Rangebank BESS (Battery Energy Storage System) image courtesy of Eku Energy and Shell Australia.

Message from Shell Australia Chair

Shell Australia plays an essential role in delivering secure, affordable and increasingly decarbonised energy for the country and the region. We are a significant foreign investor and employer in Australia, contributing to the country's social and economic prosperity through project investment, taxes, jobs and training, supply chain and social investment.

As the Chair of Shell Australia, I am deeply committed to ensuring that our operations reflect our core values of honesty, integrity and respect for people. This includes addressing modern slavery as a critical aspect of this commitment.

We recognise the profound responsibility we have to uphold human rights as outlined in the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Our approach to human rights is integrated into our policies, frameworks, business systems and processes, ensuring that our business practices contribute to a more just and equitable world.

This Statement details how Shell in Australia addresses modern slavery risks through our operations, how we assess the effectiveness of our strategies and the actions we take if our high expectations are not met. It also outlines our planned actions for 2025 to sustain progress and enhance our efforts.

In 2024, Shell in Australia spent approximately US$2.4 billion with over 1,900 suppliers and contractors, both domestically and internationally, for goods and services essential to our operations. Given the extensive nature of our supply chains, they are recognised as a potential high-risk area. This Statement examines how our Supply Chain team manages modern slavery risks, particularly focusing on direct suppliers.

In addition to our supply chains, we evaluate three other high-risk areas for human rights: communities, workplace security and labour rights.

While Australia is considered a low-risk country in this Statement, we acknowledge that modern slavery can still occur here. Therefore, we must continuously monitor our performance to ensure the effectiveness of our strategy. Throughout this document, you will find our commitment to transparency and accountability as we engage with suppliers, partners and stakeholders, enabling a collective effort to eradicate modern slavery globally.

I am proud of Shell Australia's contributions and achievements, including the approach we take to address modern slavery risks and conduct our work to the highest ethical standard.

Cecile Wake
Shell Australia Chair

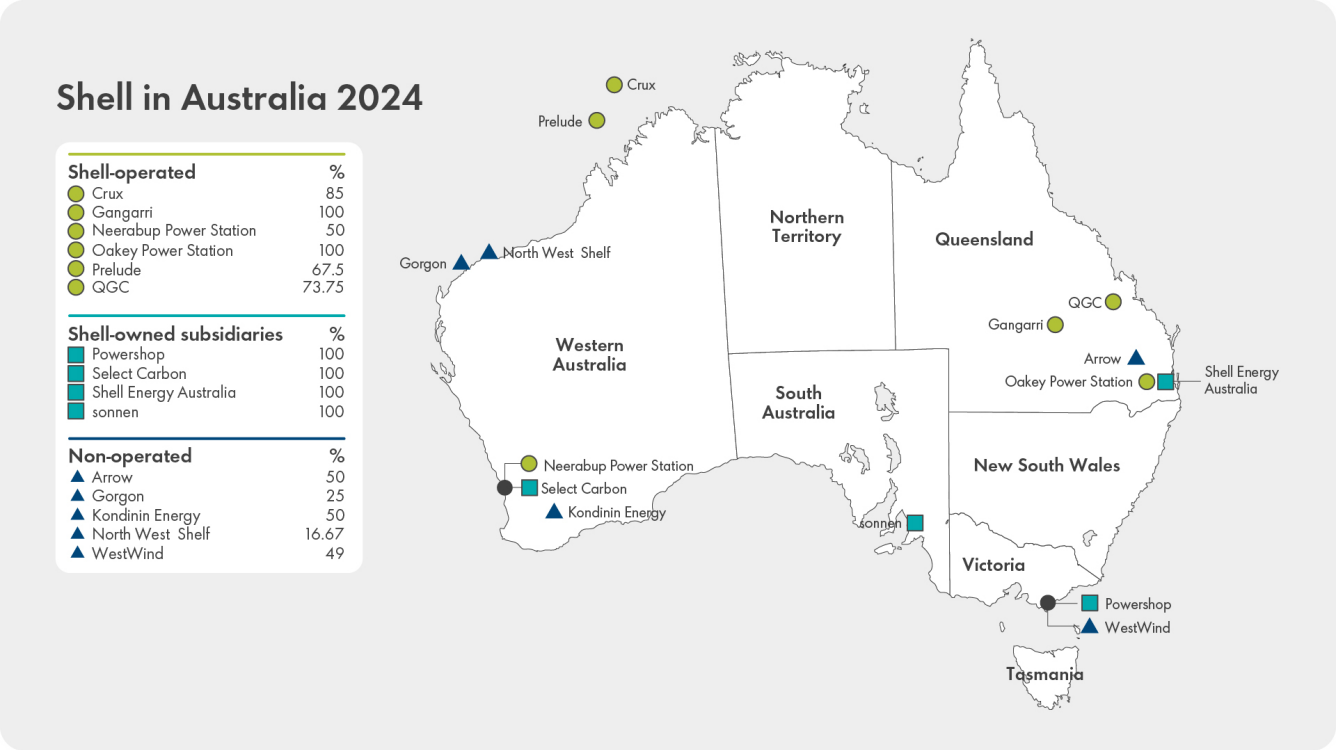
1. Reporting entity

Who we are
Shell has been active in Australia's energy sector since 1901, continuously evolving our business to help meet the needs of our customers.

Today, Shell's portfolio in Australia is delivering towards our global target to become a net-zero emissions energy business by 2050 while providing secure, affordable and increasingly decarbonised energy to customers in Australia and the region.

Our portfolio spans the nation and includes our integrated gas business as well as our growing renewables and energy solutions business.

As a significant foreign investor and employer in Australia, our longstanding history and contributions in the country are underpinned by our core values of honesty, integrity and respect for people.



See detailed description for 'Shell in Australia 2024'

Integrated Gas portfolio

Our Australian integrated gas portfolio includes two Shell operated gas production and liquefaction businesses, Shell QGC (QGC) in Queensland, and Prelude Floating Liquified Natural Gas (FLNG) off the coast of Western Australia, as well as several non-operating interests.

Queensland

Shell's interests in Queensland include QGC and the Arrow Energy joint venture.

QGC is one of Australia's leading natural gas producers, supplying the domestic market since 2006 and international customers since 2014.

The venture explores, develops and produces Queensland's world-class onshore gas reserves in the Surat Basin. Its operations include over 3,700 production wells, 26 field compression stations, six central processing plants, two water treatment plants, 540km of pipeline and a two-train LNG export facility on Curtis Island.

While Shell is the operator and majority interest holder in the QGC venture, our partners for the LNG export facility include CNOOC (50% equity in Train 1) and MidOcean Energy (2.5% equity in Train 2).

In 2024, QGC continued to ensure a reliable gas supply for Australian and international customers and commenced work on two new sets of onshore natural gas wells, which combined will bring more than 250 additional wells online. The venture also shipped its 1,100 LNG cargo at the end of 2024, marking a decade since it began supplying international customers.

Arrow Energy is a 50/50 joint venture between Shell and PetroChina that has been operating gas and power assets since 2000.

In 2024, Arrow Energy announced the next phase of the Surat Gas Project, which will be an important part of delivering on our commitment to bring more gas to market.

Western Australian

Shell's integrated gas interests in Western Australia include the Prelude FLNG facility, the Crux Project and two non-operated ventures.

Prelude FLNG is operated by Shell Australia Pty Ltd (a wholly owned subsidiary of SEHAL) in a joint venture with INPEX (17.5%), KOGAS (10%) and OPIC (5%).

The facility produces natural gas from an offshore field approximately 475km northeast of Broome. It extracts, liquefies and stores natural gas at sea, before it is transferred and shipped to customers. Prelude relies on onshore support operations which are mostly managed through the Kimberley region and Darwin.

Shell Australia is also developing the **Crux Project** to ensure a continued supply of gas to Prelude FLNG. The project consists of a not normally manned platform that will be connected to the Prelude FLNG facility via a 160km export pipeline. Shell's joint venture partner in the project is SGH Energy (15%).

We are also a non-operating partner in two major gas projects in Western Australia.

The Gorgon Project, in which Shell holds a 25% stake, is one of the world's largest LNG projects and the largest single resource project in Australia's history. It is operated by Chevron, and the other joint venture participants are ExxonMobil, Osaka Gas, Tokyo Gas and JERA.

Shell is also a foundation participant in the North West Shelf (NWS) Project, holding a 16.67% equity stake and serving as a technical advisor. The NWS Project is operated by Woodside. The other participants are BP, Chevron, MIMI and CNOOC.

Shell Energy Australia

Shell Energy Australia Pty Ltd (Shell Energy) is a wholly owned subsidiary of SEHAL and Shell's renewables and energy solutions business in Australia.

Shell Energy is Australia's largest electricity provider to commercial and industrial customers by load [A], offering innovative energy solutions across a portfolio of gas, electricity, environmental products and energy productivity solutions, to help our customers thrive through the energy transition. Through Shell Energy's residential energy retailing business, Powershop, we extend our innovative energy offerings to homes and small businesses in Victoria, New South Wales, South East Queensland and South Australia.

In 2024, Shell Energy launched an industry-first Renewable Energy Contracting Options (RECO) platform to help businesses meet their renewable energy goals simply and flexibly. It also progressed several grid-scale battery energy storage system (BESS) projects including continued construction of the Koorangie BESS and the completion of the Rangebank BESS, both in Victoria.

Shell Energy was ranked number one for customer satisfaction in the Utility Market Intelligence (UMI) Survey [B] for 14 years in a row.

Learn more about our businesses at:
www.shell.com.au and **https://shellenergy.com.au/**

[A] By load, based on Shell Energy analysis of publicly available data.
[B] UMI survey of large commercial and industrial electricity customers of major electricity retailers, including Shell Energy by independent research company NTF Group in 2011-2024.

2. Company structure, operations and supply chains

Shell plc

Shell plc (Shell) is a global group of energy and petrochemical companies employing 96,000 people across more than 70 countries.

Shell is a customer-focused organisation, serving more than 1 million commercial and industrial customers, and around 33 million customers daily at our Shell-branded retail stations.

For further information on our global businesses and supply chains, please refer to Shell plc's Statement under the **UK Modern Slavery Act for Financial Year 2024**.

Shell in Australia

In Australia, Shell's businesses, operations and supply chains are divided into Integrated Gas (upstream and midstream), Renewables and Energy Solutions, Trading and Supply and Projects and Technology.

Our Integrated Gas business activities and operations include exploration, development and production of onshore and offshore natural gas fields and shipping and trading natural gas products.

Shell Energy's business activities and operations include power generation, energy and gas retailing, project development and asset management, wholesale trading and customer support.

Both Integrated Gas and Shell Energy are supported by corporate services such as Legal, Commercial, Human Resources, Information Technology, Corporate Relations, Supply Chain, Finance and Health, Safety, Security and Environment (HSSE).

Most of the trading activities by our Australian Trading and Supply business relates to financial transactions in the electricity market and with wholesale clients or are undertaken on licensed and regulated financial exchanges. Physical trading transactions are undertaken predominately with wholesale clients such as Australian-based licensed gas retailers or large gas consumers or with other Shell Group companies.

Across our businesses and operations in Australia, we employ over 2,700 staff that represent diverse backgrounds and span locations from capital cities to regional areas.

Shell's Supply Chain team in Australia comprises over 80 people. In 2024, Shell in Australia spent approximately US$2.4 billion on goods and services, which it procured from over 1,900 suppliers and contractors (suppliers), both nationally and internationally. [C]

[C] Note: specific to Shell Energy Australia, this excludes any settlement transactions i.e., derivative counterparties, Australian Energy Market Operator (AEMO), Network companies.

This Statement predominantly describes how our Supply Chain team approaches modern slavery risk in the purchase of goods and services for our operations as we believe this to be an area that poses higher labour rights risk. Our focus, for the purpose of this Statement, is on our direct suppliers.

In Australia, the categories of goods and services Shell (excluding Shell Energy) procures generally covers the asset life cycle. This includes:

- exploration;
- construction services;
- offshore installations;
- wells services;
- rotating equipment;
- engineering and maintenance services;
- transportation and logistics;
- fuel; and
- consumables, such as operating and maintenance supplies.

For Shell Energy Australia, the range of categories of goods and services procured covers:

- engineering, procurement and construction, operations and maintenance, and equipment;
- supply for battery energy storage systems and solar;
- IT software;
- professional services and consulting;
- warehouse and logistics services;
- metering equipment;
- industrial parts for generation power stations;
- engineering, gas and maintenance services; and
- consumables.

Shell operates in all the countries from which we source goods and services for our Australian operations. Based on our contract value, our top suppliers are in Australia, Singapore and Japan, followed by the United Kingdom and United States.

Our Supply Chain team works with suppliers to deliver the non-hydrocarbon goods, services, marine, air and road logistics that are needed by Shell's diverse global businesses and assets. As part of Shell's responsible sourcing approach, we aim to work with suppliers that behave in an economically, environmentally and socially responsible manner. Our standard supplier contract terms require adherence to the Shell General Business Principles and Shell Supplier Principles (SSP) or equivalent principles. The scope of the SSP is limited to contracts managed by Shell's Supply Chain organisation.

Our Supplier Principles provide information on the expectations we have of our suppliers on the following topics:

- **Business Integrity**: Compliance with Shell standards and applicable laws and regulations, including with respect to corruption, bribery, competition and conflicts of interest.
- **Health, Safety, Security, Environment and Social Performance (HSSE & SP)**: A systematic approach to managing health, safety, security and environment, including environmental protection, energy and resource efficiency, managing social impacts, and respectful engagement with employees, communities and other stakeholders.
- **Labour and Human Rights**: Respect for human rights and labour rights, including no use of forced or child labour; no payment of recruitment fees by workers; compliance with applicable laws on freedom of association and collective bargaining; no tolerance for harassment, discrimination or retaliation; compliance with applicable laws on working hours; wages and benefits that meet or exceed national legal standards; and grievance mechanisms where concerns can be raised confidentially.

Our values, policies and approach to human rights

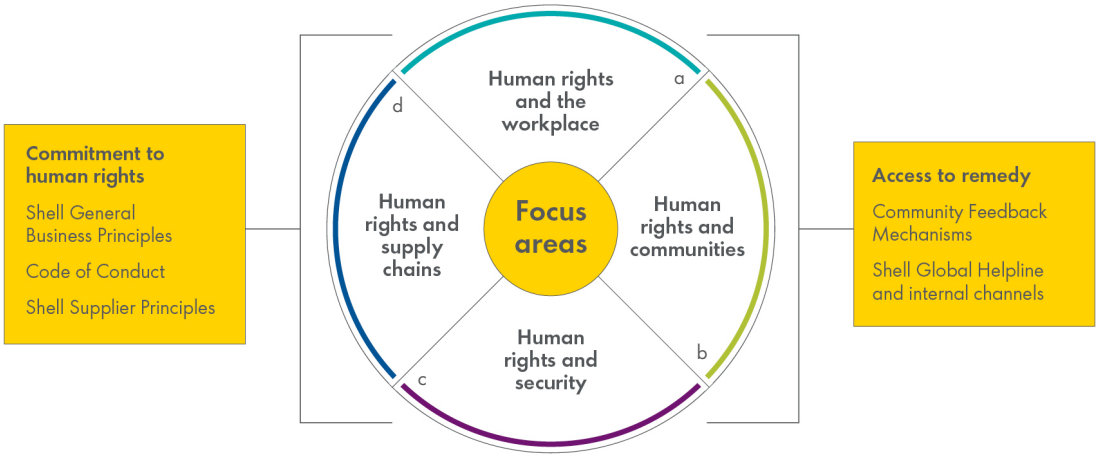
Respecting Human Rights

We recognise our responsibility to respect human rights in all aspects of doing business and we have embedded human rights in the Shell General Business Principles, Shell Code of Conduct and the Shell Supplier Principles.

For more information on Shell's policy and procedures towards human rights, please visit our Human Rights **webpage**.

Our approach is informed by the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the 1998 Declaration of the Fundamental Principles of Rights at Work of the International Labour Organization, which covers freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation.

Approach to human rights



Human rights and the workplace a

We respect our employees' and contractors' rights, including freedom from forced labour and non-discrimination by working in line with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the UN Global Compact.

Human rights and communities b

Our activities can impact the communities where we operate. Through careful project design and responsible management we aim to minimise those impacts and avoid human rights infringements. We do this in line with the International Finance Corporation's Performance Standards and the UN Guiding Principles on Business and Human Rights. We work with local communities to jointly identify solutions and opportunities.

Human rights and security c

Shell aims to keep staff and facilities safe while respecting the human rights and security of local communities. We carefully assess the security threats and risks to our operations and work with governments and partners to provide a secure working environment. Shell only uses armed security in countries where the threats are most severe, or if it is a requirement under local laws.

Human rights and supply chains d

The Shell Supplier Principles outline what we expect from contractors and suppliers in areas such as human rights. This includes ensuring no use of forced, prison or compulsory labour or payment of recruitment fees by workers. The principles also ensure a safe, secure and healthy workplace for staff and contractors and payment of wages that meet or exceed national legal standards.

See detailed description for the 'Approach to human rights'

Where we have potentially caused or contributed to adverse impacts, we provide and facilitate access to remedy through our Community Feedback and worker voice mechanisms, the Shell Global Helpline.

Shell does not require individuals or communities to permanently waive their legal right to bring a claim through a judicial process as a precondition of raising a grievance through a Shell grievance mechanism, nor will Shell otherwise take extrajudicial measures to obstruct state-based judicial processes.

Our high-risk contracts contain requirements for the contractor to provide access to remedy provisions in accordance with our worker welfare ambition. Our contractors and suppliers are expected to conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization.

The Shell Supplier Principles further clarify the expectations we have of our suppliers on labour and human rights, including (but not limited to):

- no use of child labour;
- no use of forced, prison or compulsory labour;
- no payment of recruitment fees by workers;
- compliance with all applicable laws and regulations on freedom of association and collective bargaining;
- a safe, secure and healthy workplace that does not tolerate discrimination, harassment or retaliation;
- compliance with all applicable laws and regulations on working hours; and
- providing wages and benefits that meet or exceed the national legal standards.

All Shell companies and Shell-operated joint ventures must comply with local legislation and regulations and must conduct their activities in line with the Shell General Business Principles and our core values of honesty, integrity and respect for people. When entering a joint venture operated by a partner, we expect them to apply standards, processes and principles that are materially equivalent to our own. When acquiring new companies, we integrate these companies into the Shell Control Framework.

3. Assessing and identifying our modern slavery risks

Risks in our operations and supply chains

We recognise that certain areas of our operations and supply chains may pose higher labour rights and modern slavery risks due to their location and the nature of the goods and services procured. This section describes the approach our Supply Chain team generally takes in assessing the risk of modern slavery practices in our operations and supply chain.

Risk assessments are one of the tools we use to implement or improve risk-based controls. In compliance with the Shell General Business Principles, we assess our suppliers' capability to manage labour rights and worker welfare risks within their operations and supply chains.

The Shell Supplier Principles apply to all our suppliers and outline our expectations in accordance with the Shell General Business Principles. All Shell's general purchase terms and conditions include a clause requiring adherence to these Principles and ensuring compliance forms an integral part of our required regulatory reporting (e.g., the UK Modern Slavery Act and the Australian Modern Slavery Act).

A risk-based approach has been adopted based on a combination of factors, including the supplier's trading address, the country of service execution or goods manufacture and the services provided by the supplier. If the supplier is identified as having an elevated risk for labour rights and worker welfare, we undertake a detailed assessment of the supplier's management systems and processes to ensure they are capable of effectively managing the risks within their own operations and supply chains.

Where requested by a Shell representative, the supplier is required to respond to our industry standard labour rights questionnaire and provide the identified supporting documentation. In addition, we also have a right to audit, including site visits to assure capable management systems and processes.

In these cases, a Shell data specialist reviews the information and documentation provided and assesses the robustness of the supplier's management systems. They provide feedback to Shell's Contract Management team who will make decisions respective to the situation. This analysis helps inform which suppliers to shortlist for invitation to a tender and is considered in the evaluation of any bids we receive from the supplier.

The supplier will be given feedback on any gaps identified, and where a decision to award a contract is made, the supplier will be expected to work with the Shell contract representative to close the identified gaps within a limited timeframe and undergo a re-assessment.

We continuously review our approach to our labour rights risk assessment in our supply chains to ensure they are fit for purpose.

Risk assessments of our suppliers include a combination of both category and country risk:

Category risk

Supply chain category risk has been determined by analysing typical contract work scopes to consider where there may be higher risks of unethical labour practices such as recruitment of migrant workers by contractors or agents working on their behalf.

Shell Australia has determined the following to be high-risk categories, based on contract value concentration:

- engineering, research and technology based services;
- building, facility construction and maintenance services;
- transportation, storage and mail services;
- mining, oil and gas services; and
- manufacturing components and supplies.

Country risk

Supply chain country risk is derived from external indices provided by Verisk Maplecroft that indicate the potential for modern slavery risks in country and for migrant workers from these countries.

Shell Australia has determined the following to be high-risk countries, based on contract value concentration of direct suppliers:

- United Arab Emirates;
- Malaysia;
- China;
- Indonesia; and
- India.

Direct suppliers located in high-risk countries comprise less than one percent of our total contract spend for Shell in Australia.

Risks in business models

We acknowledge there may be risks as we utilise global framework agreements in Australia. Global Enterprise Framework Agreements (EFAs) awarded in various countries but used in Australia for commerciality purposes may need to be checked for modern slavery risks compliance.

Should an EFA need to be called off, local contract terms and conditions will be applied, and local due diligence over and above the existing EFA will be completed if necessary.

Additionally, global contractors may make use of subcontractors. Each of Shell's contractors and suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.

Contractually, subcontractors form part of the Contractor Group, and must meet the following requirements:

- they must comply with applicable laws, the Shell General Business Principles and the Shell Supplier Principles;
- if the Contractor Group supplies staff, they must behave in a manner consistent with the Shell Code of Conduct; and
- if the Contractor Group becomes aware of (suspected) violations, they can report using the Shell Global Helpline.

Shell continues to strengthen its risk assessment to identify risks of modern slavery in our supply chains or where mitigations may be needed in our businesses, including in areas of new business development.

Modern Slavery Assessment Tool

We continue to utilise the Modern Slavery Assessment Tool (MSAT) via a third-party provider to increase modern slavery risk visibility to more suppliers and improve our understanding of potential risks across the supply chain.

MSAT questions cover inherent risks (geographical and industry) and risk controls (policy, procedure and workforce). Sources of the assessment and analysis include The Social Responsibility Alliance; Global Slavery Index; International Labour Organization; Australian, United States and United Kingdom Government departments; and UNICEF.

Participating suppliers are selected based on contract category, status and expiration. They are asked to complete a self-assessment questionnaire online. After each supplier completes and submits the questionnaire, their responses are assessed to determine their modern slavery risk scores and associated risk category.

Post assessment, action items are identified to reduce the unmitigated risks uncovered during the assessment across Shell's supply chain.

4. Actions taken to address risks

We recognise the role of labour rights due diligence in bringing our commitments to life. This section describes the due diligence and remediation process taken in assessing and addressing potential modern slavery risks.

Shell has established standards in support of fundamental labour rights for value chain workers on Shell sites and dedicated supplier staff on non-Shell sites. These are embedded in our Safety, Environment and Asset Management Standards and our Category Management and Contracting Process Framework (CMCP). We refer to them collectively as "worker welfare". Our approach is based on the 10 principles established by Building Responsibly, an alliance of companies that seeks to promote the rights and welfare of workers in the engineering and construction industry.

Before awarding a contract, our standards require an assessment of whether the contract has high potential exposure to worker welfare impacts. If so, our standards require us to pre-qualify the supplier's capability to manage these issues. For contracts with high potential exposure to worker welfare risks, our standards require the supplier to develop a worker welfare management plan.

The plan is designed to achieve compliance with the Building Responsibly principles and International Finance Corporation [D] and European Bank for Reconstruction and Development standards on worker accommodation. It establishes minimum expectations for labour rights, including:

- no discrimination;
- no forced, trafficked or child labour;
- ethical recruitment;
- freedom to change employment;
- access to documentation;
- respect for wage and benefit agreements;
- worker representation;
- access to grievance mechanisms; and
- healthy, safe and habitable living and working conditions.

The plan includes regular performance measurement and reviews. Our standards require suppliers to consider worker feedback when developing or updating the plan.

Our standards require us to assure the effectiveness of worker welfare management plans, review performance against contractual requirements and agree actions for continuous improvement.

We use a risk-based approach to verify implementation of action plans through mechanisms such as audits, site visits and updates as part of general business performance reviews with suppliers.

Enhanced value chain due diligence

In 2024, we took steps to strengthen our human rights due diligence processes for sourcing goods and services. We have introduced a new policy within our Category Management and Contracting Process Framework requiring additional due diligence for new contracts with high potential for human rights impacts. The scope of this policy is currently limited to contracts managed by Shell's Supply Chain organisation.

For new contracts, we apply a risk-based approach to screening for potential human and labour rights impacts during pre-qualification or tendering. We conduct due diligence to verify suppliers' ability to meet our standards for categories of goods and services with high potential exposure to negative impacts. These categories include specified raw materials, feedstocks, components, transport and logistics services.

For high-risk contracts, the policy requires suppliers to complete a capability assessment of their ability to prevent, mitigate and remediate negative impacts within their own operations and relevant parts of their supply chain. If gaps are identified, suppliers are required to develop an action plan with controls in place prior to contract commencement, with the intent to mitigate the gaps throughout the duration of the contract.

For contracts assessed as high risk for potential impacts, the policy also requires the inclusion of human rights due diligence clauses and progress checks during contract performance reviews.

[D] https://www.building-responsibly.org/worker-welfare-principles

Health, Safety, Security, Environment & Social Performance Control Framework

The HSSE & SP Control Framework defines mandatory standards, requirements and accountabilities.
The framework applies to Shell entities and Shell-operated ventures, including employees and contractor staff.

Mandatory manuals describe:

- Purpose of the manual
- Accountabilities and responsibilities
- Scope
- Requirements to be met

HSSE & SP Management System	Health	Personal Safety
Process Safety	Environment	Social Performance
Security	Product Stewardship	Transport
Contractor HSSE Management	Projects	Resources

The Building Responsibly Worker Welfare Principles

- Workers are treated with dignity, respect and fairness
- Workers are free from forced, trafficked, and child labor
- Recruitment practices are ethical, legal, voluntary, and free from discrimination
- Freedom to change employment is respected
- Working conditions are safe and healthy
- Living conditions are safe, clean, and habitable
- Access to documentation and mobility is unrestricted
- Wage and benefit agreements are respected
- Worker representation is respected
- Grievance mechanisms and access to remedy are readily available

Training at Shell

Shell staff undertake regular training on our Code of Conduct and Ethics and Compliance policies. Training participation is documented, repetition cycles are clearly defined and follow-up is automated. Shell's Code of Conduct and General Business Principles are accessible on our website in several languages.

Attention to modern slavery and related human rights issues is an integral part of our contracting and procurement process. Training is provided for the Contract Management team to gain visibility on current and accurate supplier information. Following completion of supplier assessments, our staff who manage contracts with a higher labour rights risk may be given individual coaching and support on how to manage supplier corrective action plans.

In 2020, we rolled out specific Worker Welfare training for staff at sites who are responsible for managing contractors, and for worker welfare assessments and plans. For our suppliers, we have developed a Worker Welfare information pack to enhance their understanding of how to manage worker welfare and labour rights when working for Shell. We have supported Building Responsibly and Ipieca in the joint development of labour rights training which we offer, free of charge, to all our contractors.

In 2024, we continued to work on human rights issues which address those who are at most risk from our operations. We prioritise four focus areas where respect for human rights is critical to how we operate: communities, security, the workplace including labour rights and supply chains.

Shell employees working in these focus areas need to complete mandatory human rights training. In addition, we encourage all employees to complete the course regardless of their role, to build greater understanding of human rights across Shell.

Links to our policies and principles mentioned in this Statement are set out below:

Shell Strategy
Read more about the Shell Strategy at this link

Shell General Business Principles
Read more about Shell's General Business Principles at this link

Shell Code of Conduct
Read more about the Shell Code of Conduct at this link

Shell Supplier Principles
Read more about the Shell Supplier Principles at this link

Shell Sustainability Report
Read more about the Shell Sustainability Report at this link

Worker welfare in Shell
Read more about Worker welfare in Shell at this link

Human rights in Shell
Read more about Human rights in Shell at this link

The Shell Global Helpline
Read more about the Shell Global Helpline at this link

Shell Australia Whistleblower Policy
Read more about Shell Australia Whistleblower Policy at this link

5. Risk effectiveness

Effectiveness and performance management

This section describes how we generally assess the effectiveness of the risk assessment, due diligence and training actions described in the sections above.

Through our supplier qualification process, suppliers may be subject to onsite audits, which could be announced or unannounced, and which may be performed by either Shell staff or third-party auditors.

The Shell Global Helpline is a means to report grievances or any activity that is inconsistent with Shell's Code of Conduct, including human rights violations. All Shell employees, contract staff and third parties with whom Shell has a business relationship can use the helpline if they observe wrongdoing by a Shell company or employee.

In addition, Shell has a Whistleblower Policy for Australia. The policy has been prepared to meet requirements under the Australian Corporations Act and the Australian Securities and Investments Commission's guidelines. Australia has enacted a legal regime that provides specific protections for those making reports of certain types of wrongdoing (the Australian Whistleblower laws). This policy explains Whistleblower protections, including how they apply in relation to the group of Australian companies that are controlled directly or indirectly by the UK-incorporated Shell plc and to Shell Australia's businesses and operations. It also describes how these protections interact with relevant Shell Global Policies.

To assess the effectiveness of our actions on worker welfare, including effectiveness of grievance mechanisms, we may undertake checks ranging from self-assessment and peer review to internal audits. Contractors or suppliers may be subject to on-site audits on Shell sites and some contractor locations e.g., fabrication yards which could be announced or unannounced, where we check contractor performance with regards to worker welfare. These audits may be performed by either Shell personnel or third-party auditors and are to assure capable management systems and processes are in place.

We also perform periodic contract reviews which may include assessing the effectiveness of the grievance mechanism and contract-specific key performance indicators. We may gather worker feedback through surveys, site visits and other channels. Allegations of practices running contrary to the Shell Supplier Principles that are raised with us will be investigated and may result in the supplier being required to develop corrective action plans, backed up by onsite audits. If corrective action is not undertaken satisfactorily, then Shell can terminate the contract for breach of supplier principles. In addition, contracts may be terminated if suppliers breach the Shell General Business Principles.

To ensure performance effectiveness, our Contract Management team conducts a regular post-award contract management review which includes compliance with Shell Supplier principles and worker welfare as agenda items as appropriate.

Where changes in worker welfare risk profile occur, the team verifies that the contractor addresses such changes and continually assesses suppliers' worker welfare performance and applies appropriate consequence management if there are any serious performance issues.

A monitoring and reporting plan, which includes both leading and lagging performance indicators, is a tool used to verify if the Contract Worker Welfare Management plan is implemented and effective in managing risks. An example of a leading indicator is having a worker welfare management process in place and that risk assessments and gap closures are planned and completed. Lagging indicators include the number of complaints reported, investigated and resolved – provided there is a reporting system in place.

To improve how we manage worker welfare, we updated our expectations in the Shell Commitment and Policy on HSSE & SP to include implementation of the Building Responsibly principles. For contracts assessed as having high potential impact on worker welfare, we introduced new requirements as part of our Safety, Environment and Asset Management Standards on worker welfare to help make sure value chain workers are informed of welfare and labour rights issues and how to get access to remedy before starting work.

In 2024, we continued to collaborate with peers and suppliers to drive higher standards and consistency across the industry. With Ipieca, we developed a toolkit of definitions and resources to support oil and gas companies as they work to enhance worker engagement and responsible recruitment.

6. Report consultation

Collaboration with others

This section describes our collaboration with others, including the process of consultation with the entities we own or contract, as well as those entities jointly reporting under this Statement.

Global collaboration

Globally, Shell is a member of the Business for Social Responsibility (BSR) human rights working group which provides an opportunity for a cross- sector group of companies to openly share best practices, challenges, questions and experiences implementing the Guiding Principles on Business and Human Rights across a diverse range of operational environments. In addition, BSR is a member of Shell's Human Rights Working Group, providing advice and challenge to our approach on human rights across Shell and our supply chains.

We use our memberships on multiple bodies to test our approach, learn from others and contribute to the development of good practice that may be used both in our own business and with our suppliers. These bodies include the International Petroleum Industry Environmental Conservation Association, the International Association of Oil and Gas Producers, the International Organisation of Employers, The Conference Board, the UN Global Compact Action Platform on Decent Work in Supply Chains and our attendance and participation at the UN Annual Forum on Business and Human Rights.

Joint venture operators

Shell is a non-operating equity owner in several joint ventures across Australia. We set clear expectations regarding adherence to the Modern Slavery Act for the operators of these ventures.

All joint venture operators have clear public policies which oppose the occurrence of modern slavery (Human Rights Policy and Code of Conduct), consistent with Shell's position and expectations. The joint venture operators also require all suppliers of goods and services to adhere to these policies as part of their contracts with suppliers.

The joint venture operators conduct regular risk assessments across their operations and supply chains for potential human rights risks. Clear action plans to mitigate potential risks, including contractual clauses setting expectations of suppliers, clear due diligence processes in supplier evaluations and training programs for operator personnel are also in place.

Consultation with reporting entities

SEHAL consulted with its Board as well as the boards of all other reporting entities mentioned on page one to develop this Statement.

In addition, SEHAL confirmed with its relevant subsidiaries and the reporting entities providing this Statement whether they follow the Shell processes as described in this Statement. Key differences from the Shell process have been set out in this Statement.

7. Other relevant information

Looking ahead

At Shell, our business principles guide how we go about delivering our strategy to deliver more value with less emissions.

These principles are based on our core values of honesty, integrity and respect for people and include the steps we take to safeguard against forced labour in our business and supply chains.

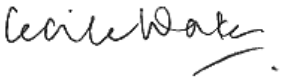
This Shell Australia Modern Slavery Statement sets out these steps throughout 2024. We continue to make progress and remain committed to enhancing our efforts in this area, including learning and adjusting our approach where necessary. While in our Statement we identify Australia as a low-risk country, we recognise that modern slavery still occurs in Australia.

Therefore, we need to continuously examine our supply chain performance and complete ongoing supplier verification to capture any areas of non- compliance. For 2025, this means we will continue to:

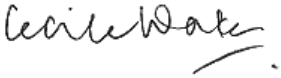
- manage worker welfare in line with our standards; and
- embed our policy on enhanced value chain due diligence.

Appendix

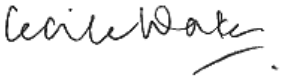
This Statement has been approved by the Boards of the following parent reporting entities, on behalf of their respective subsidiary reporting entities covered by this Statement.



Cecile Wake
Company Director:
Shell Energy Holdings Australia Ltd
Date:



Cecile Wake
Company Director:
QGC Upstream Holdings Pty Ltd
Date:



Cecile Wake
Company Director:
QGC Midstream Holdings Pty Ltd
Date:

Appendix A

Details of reporting entities:

Reporting Entity	Entity Structure	Australian Company Number
Shell Energy Holdings Australia Ltd	Unlisted Australian Public Company, Limited by Shares	ACN 054 260 776
Shell Australia Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 009 663 576
Shell Energy Environmental Products Australia Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 065 879 950
Shell Energy Australia Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 085 757 446
Shell Energy Operations Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 122 259 223
Shell Energy Retail Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 126 175 460
Powershop Australia Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 154 914 075
QGC Upstream Holdings Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 130 856 843
QGC Upstream Limited Partnership	Limited Partnership	ABN 83 715 246 894
QGC Upstream Investments Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 131 104 651
QGC Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 089 642 553
Condamine Power Station Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 121 868 273
QGC Midstream Holdings Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 130 927 203
QGC Midstream Investments Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 130 857 215
QGC Train 1 Tolling Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 142 293 650
QGC Train 2 Tolling Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 142 293 687
QGC Train 2 Tolling No.2 Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 147 896 535
QGC Train 1 Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 139 569 412
QGC Train 2 Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 139 569 458
QGC Common Facilities Company Pty Ltd	Australian Proprietary Company, Limited by Shares	ACN 139 569 485

Appendix B

Australian Modern Slavery Act mandatory reporting criterion	Reference in this Statement	This 2024 Statement includes
Identify the reporting entity	Reporting entity – pages 3-4	○ Relevant reporting entity that complies with the Modern Slavery Act
Describe the structure, operations and supply chains	Who we are – pages 3-4 Our business, operations and supply chains – pages 5-7	○ Business structures, operations and supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Assessing and identifying our modern slavery risks – pages 8-9	○ Tools used and steps taken to identify top potential risks ○ Country risks ○ Category risks ○ Risks in business models ○ Risks in the supply chain
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions taken to address risks – pages 10-11 Training at Shell – page 12	○ Our approach to human rights inclusive of values and policies ○ Due diligences in place ○ Action taken to mitigate risks ○ Approach taken to build capabilities
Describe how the reporting entity assesses the effectiveness of such actions	Risk effectiveness – page 13	○ Internal assurances and onsite audit ○ Worker Welfare Principle ○ Monitoring of grievances mechanisms ○ Monitoring of performance data
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the state	Report consultation – page 14	○ Process of consultation with reporting entities including joint ventures
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Looking ahead – page 14	○ Approach to progress improvement in mitigating ○ the risk of modern slavery

Accessible descriptions

Shell in Australia 2024

This diagram provides an overview of Shell's assets and operations across Australia, categorised by their operational control and ownership stakes.

The map of Australia indicates the geographical location of various Shell-related sites. These are differentiated by shape and colour to represent Shell-operated assets (green circles), Shell-owned subsidiaries (teal squares), and non-operated assets (blue triangles).

A legend accompanies the map, detailing each asset and the percentage of Shell's ownership or stake in it.

Shell-operated assets include:

Crux (8.5%)
Gangarri (100%)
Neerabup Power Station (50%)
Oakey Power Station (100%)
Prelude (67.5%)
QGC (73.75%)

Shell-owned subsidiaries are:

Powershop (100%)
Select Carbon (100%)
Shell Energy Australia (100%)
Sonnen (100%)

Non-operated assets are:

Arrow (50%)
Gorgon (25%)
Kondinin Energy (50%)
North West Shelf (16.67%)
WestWind (49%)

The map shows these assets distributed across several Australian states and territories. For example, Prelude and Crux are located offshore in the North West. Gorgon, North West Shell, Neerabup Power Station, Select Carbon and Kondinin Energy are in the state of Western Australia. Sonnen is located in the state of South Australia. Gangarri, QGC, Arrow, Oakey Power Station and Shell Energy Australia are in Queensland. Powershop and WestWind are shown in Victoria.

Return to the Shell in Australia 2024 map

Approach to human rights

The diagram represents Shell's approach to human rights, structured around four key focus areas, foundational commitments and access to remedies.

At the centre is a yellow circle labelled "Focus areas", which is divided into four areas – Human rights and the workplace, Human rights and communities, Human rights and security and Human rights and supply chains.

On either side of the circle are two boxes highlighting sectors that support these focus areas.

The left box, "Commitment to human rights" features Shell General Business Principles, Code of Conduct and Shell Supplier Principles.

The right box, "Access to remedy" features Community Feedback Mechanisms and Shell Global Helpline and internal channels.

Return to the Approach to human rights diagram