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# Australia Modern Slavery Statement

2022

For the period 1 January – 31 December 2022

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ExxonMobil Australia Pty Ltd

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Mobil PNG Gas Holdings Pty Ltd

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and related reporting entities

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## 1. Introduction

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This Modern Slavery Statement has been prepared in line with the requirements of the *Modern Slavery Act 2018* (Cth) in relation to the financial year 1 January – 31 December 2022. This is a joint statement made by the following reporting entities under the Act ("**Reporting Entities**"), in relation to their own operations and those of the entities they own or control ("**Controlled Entities**"):

- ExxonMobil Australia Pty Ltd ABN 48 091 561 198, and its wholly owned subsidiaries Esso Australia Resources Pty Ltd, Mobil Australia Resources Company Pty Ltd, Mobil Exploration and Producing Australia Pty Ltd, Mobil Oil Australia Pty Ltd, Ampolex (Indonesia) Pty Ltd, Mobil PNG Pty Ltd and Mobil Oil New Guinea Limited; and
- Mobil PNG Gas Holdings Pty Ltd ABN 35 008 633 707.

The registered office of the Reporting Entities is Level 9, 664 Collins Street, Docklands, Victoria 3008, Australia.

The ultimate holding company of the Reporting Entities is Exxon Mobil Corporation.

The policies, procedures, and systems described in this Statement have been adopted by each of the Reporting Entities and their Controlled Entities. References to "we", "us", and "our" in this report are to one or more Reporting Entities and/or Controlled Entities, unless the context otherwise requires.<sup>1</sup>

We have arranged for appropriate consultation to be undertaken between us in relation to this Statement, in particular through reviews by personnel in our Upstream and Downstream business lines, and with the support of personnel in Procurement, Law, and other functions.

This Statement has been approved by the Board of Directors of each Reporting Entity. We are committed to respecting human rights as a fundamental principle in our operations.

## 2. Structure, operations and supply chains

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### Downstream operations

In Australia, Fiji and Papua New Guinea we are involved in the purchase, storage, distribution, marketing and sales of petroleum fuel products. Our operations include managing storage and distribution infrastructure to provide safe and reliable delivery of fuels to our customers.

The Altona site has undergone some significant changes during the last two years. Previously operating as a refinery, it is now functioning as an import and storage terminal. The refinery's shutdown has been successfully completed with all refinery process units now resting and the last flare was turned off in May 2022. Following this transition, we will continue to operate a fuel import and storage terminal at the Altona site.

Further information about our Australian operations is available at [www.exxonmobil.com.au](http://www.exxonmobil.com.au).

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<sup>1</sup> A reference to "affiliate" is a reference to one of our related bodies corporate. Nothing in this statement is intended to override the corporate separateness of affiliated entities.

## **Upstream operations**

In Australia, we operate a network of offshore platforms in Bass Strait that produce oil and gas. We process, store and transport these products at our onshore processing facilities in Longford and Long Island Point, for supply to customers. Further information about our Australian operations is available at [www.exxonmobil.com.au](http://www.exxonmobil.com.au).

In Papua New Guinea, ExxonMobil PNG Limited, a Controlled Entity of Mobil PNG Gas Holdings Pty Ltd, is the operator of the PNG LNG Project in which our affiliates together hold a ~33.2% participating interest.<sup>2</sup> The Project includes gas production and processing facilities, more than 700 kilometres of onshore and offshore pipeline, a gas conditioning plant in Hides, and a liquefaction and storage facility near Port Moresby. Further information about the operations of the PNG LNG Project is available at [www.pnglng.com](http://www.pnglng.com).

We also hold participating interests in, and operate, a number of exploration joint ventures in Papua New Guinea.

## **Supply chains**

Our operations require a wide variety of goods and services to operate, the majority of which are produced with higher-skilled and trained labour, including engineering and technical services, as well as specialized equipment and services for oil and gas operations that require vocational training.

Our supply chain includes purchasing refined petroleum products from suppliers located in Australia, as well as other countries. The majority of imported refined petroleum products were purchased from our affiliates. Refined petroleum products were also purchased from third parties located in Australia, and in other countries. The production, operation and trading of refined petroleum products generally require technical and professional skills and use of capital-intensive assets.

To support our operations, Procurement personnel steward the acquisition of other goods and services from third parties, including engineering, procurement and construction services, general maintenance and technical support services, chemicals, drilling services and equipment, transportation and logistics services, operations support services including supply vessels and catering services, temporary labour and specialist consultancies, and corporate services such as information technology (IT) and marketing support. Goods and services to support our operations were purchased from third parties located in the host country as well as from other countries.

Our operations also require marine transportation services via ocean-going cargo vessels.

## **Non-Operated Interests**

We hold non-operated interests in a number of joint ventures in Australia, Papua New Guinea and Indonesia, including a 25% interest in the Gorgon natural gas project in Western Australia.

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<sup>2</sup> Certain Controlled Entities including ExxonMobil PNG Limited and Mobil Oil New Guinea Limited are companies registered in Papua New Guinea. These Controlled Entities do not operate or conduct business in Australia. No Reporting Entity operates or conducts any business in Papua New Guinea.

### **3.1 Assessment and description of the risks of modern slavery**

For the purposes of preparing this statement, the risks of modern slavery<sup>3</sup> in our operations and supply chains were reviewed.

In our operations, we do not utilise forced or compulsory labour and forbid the use of children in our workforce. All of our employees are above the legal employment age in the country of their employment and are recruited and provided with working conditions and the payment of wages and benefits that comply with applicable laws and regulations. Our complex operations require deep technical skills. The majority of our employees are higher-skilled professionals and trained labour with either technical degrees, including from scientific and engineering disciplines, vocational qualifications, industry licences and/or ongoing competency training relevant to their roles.

We note that since its inception in 2009, the PNG LNG Project has operated under a standalone Environmental and Social Management Plan (**ESMP**) that includes assessments of human rights risk, mitigation, verification, and other processes for the Project. Further information about the PNG LNG Project ESMP and related management plans is available at [www.pnglng.com](http://www.pnglng.com).

In the supply chain of our other operations there may be a potential for modern slavery risks in relation to refined petroleum products imported from non-affiliated sources; and third party suppliers of lower-skilled, physical labour, such as for facilities services and operations maintenance services (e.g. janitorial, catering, landscaping); and shipping.

Potential modern slavery risks exist in the supply chain of refined petroleum products from non-affiliated sources located in countries with a general prevalence of modern slavery risk.

### **3.2 Actions taken to address modern slavery risks**

We maintain a commitment to safeguarding the health and security of our employees and the public, responsibly managing our social impacts, and upholding respect for human rights in our operations. It is our policy to comply with all applicable laws and regulations, including those related to employment, safety, security, health and the environment.

We are committed to respecting human rights as a fundamental principle in our operations, reinforced through training and integrated into our policies and practices.

#### **Standards, procedures and processes**

Our respect for the rights of our workforce and those within the communities where we operate is embedded throughout our policies, practices and expectations and reflect the spirit and intent of the United Nations Universal Declaration of Human Rights. They also support the International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work (ILO Declaration), including:

- Freedom of association and effective recognition of the right to collective bargaining.
- Elimination of all forms of forced or compulsory labor.
- Effective abolition of child labor.
- Elimination of discrimination in respect of employment and occupation.

Our policies and practices also incorporate elements of the 2011 U.N. Guiding Principles on Business and Human Rights (UNGPs) "Protect, Respect and Remedy" framework for the distinct but complementary roles of businesses' and governments' regarding human rights including commitments, due diligence and access to remedy.

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<sup>3</sup> As defined in the *Modern Slavery Act*.

Our Standards of Business Conduct are the principles that guide the conduct of our business operations by all employees at all levels. Through the Standards of Business Conduct, we commit to:

- being good corporate citizens in all the places where we operate;
- maintaining high ethical standards;
- obeying all applicable laws, rules and regulations; and
- respecting local and national cultures.

The Standards of Business Conduct include our Ethics Policy, which affirms our philosophy that the way results are achieved is as important as the results themselves, and states that even where the law is permissive, the course of highest integrity is chosen.

Consistent with our Standards of Business Conduct and our Ethics Policy, we expect compliance by all officers and employees with applicable laws and regulations and prohibit conduct constituting modern slavery.

We operate through various standards, procedures and processes, which outline practices in various socioeconomic areas, including human rights. The Operations Integrity Management System (OIMS) under which we operate provides standards and expectations that may be used to identify, monitor, and manage ongoing risks, including in the area of human rights.

### **Addressing modern slavery risks in our supply chains**

We hold our suppliers, vendors and contractors to stringent compliance, anti-corruption, non-conflict, safety and other guidelines and our standard terms and conditions oblige suppliers to adhere to all applicable laws and regulations.

For activities stewarded by Procurement personnel, we apply a rigorous set of standards and follow procedures that outline the requirements for acquiring goods and services, processes for qualifying suppliers, executing contracts and monitoring supplier performance during the contract term. We use an integrated, risk-based due diligence approach that focuses on workplace rights and leverages our current practices and systems to identify, assess and manage potential human rights risks.

Before awarding a Procurement contract, ExxonMobil screens suppliers across a number of compliance areas – including sanctions, anti-corruption, and human trafficking. We use third-party information such as government and media databases. Our due diligence process for identifying, assessing and monitoring human rights risks focuses on three factors: the supplier, the commodity, and the location. Identification of a higher risk in these areas triggers our further assessment of a supplier's policies and risk management practices prior to continuing with the contracting process.

The standard terms and conditions used by Procurement personnel oblige suppliers to adhere to all applicable laws and regulations, including those related to employment, safety, security, health and the environment, impose similar terms and conditions on their subcontractors, and permit audits and allow access to office and work locations, documentation and personnel. These standard terms also allow for termination if the supplier's performance is not acceptable. Enhanced contractual requirements with respect to human rights and modern slavery may also be utilised depending on the level of risk assessed.

Procurement personnel reiterate Supplier Expectations, including on human rights, on an annual basis through a Year End Supplier Letter sent to suppliers, vendors, and contractors that they steward. In 2022, letters were sent to more than 667 suppliers across Australia, Fiji and Papua New Guinea. The Supplier Expectations include:

- complying with laws, rules, and regulations applicable to their businesses;
- conducting operations and business practices in a manner consistent with ILO Declaration noted above; and
- managing activities in a manner that respects human rights and is consistent with the United Nations Guiding Principles on Business and Human Rights in effect as of 2011.

Throughout 2022, computer-based human rights awareness training has been available to company employees, including professionals in the Procurement function, to improve their understanding of human rights issues and awareness of potential human rights risks.

We do not own or operate cargo vessels. Any cargo vessels providing marine transportation services must, at a minimum, comply with the standards set out in the Maritime Labour Convention, which establishes minimum working and living standards for seafarers and imposes inspection requirements on ratifying states, including whether the vessels are in compliance with Convention requirements on seafarers rights.

### **PNG LNG**

The PNG LNG ESMP comprehensively addresses the requirements of OIMS and in addition is designed to secure compliance with IFC Performance Standards, local law, and relevant international conventions including the International Labour Organisation Core Conventions<sup>4</sup>. The ESMP includes specific management plans for Labour and Working Conditions, Procurement and Supply, and Stakeholder Engagement (including grievance management processes).

### **Non-operated joint ventures**

We also hold interests in joint ventures that we do not operate. Our joint venture operators are required to adhere to all applicable laws and regulations in the conduct of joint venture operations. In addition, we have processes in place to identify and manage health, safety, and socio-economic risks (which may include human rights risk) in non-operated joint ventures.

## **3.3 Actions taken to assess effectiveness**

As part of OIMS, we regularly undertake audits and reviews of various aspects of our business operations. The effectiveness of our business practices and compliance with all applicable laws (including those in relation to modern slavery) are in scope for these assessments. In addition, assessments are carried out of relevant third parties including those providing materials and services and contract labour. During 2022, four key global staffing agencies were assessed as part of the annual Compliance Check program.

To establish a consistent understanding of our ethical standards, employees are required to confirm annually that they have read, and are in compliance with, the Standards of Business Conduct.

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<sup>4</sup> Freedom of Association and Protection of the Right to Organise Convention, Right to Organise and Collective Bargaining Convention, Forced Labour Convention, Abolition of Forced Labour Convention, Minimum Age Convention, Worst Forms of Child Labour Convention, Equal Remuneration Convention, and Discrimination (Employment and Occupation) Convention.

Through our Open Door Communication process, employees are encouraged to ask questions, voice concerns, and make appropriate suggestions regarding the business practices of the Reporting Entities. Employees are expected to report promptly to management suspected violations of law, policies, and internal controls, so that management can take appropriate corrective action. Depending on the subject matter of the question, concern, or suggestion, each employee has access to alternative channels of communication, for example, the Controller's Department; Internal Audit; the Human Resources Department; the Law Department; the Safety, Health and Environment Department; the Security Department; and the Treasurer's Department. Employees have access to processes that allow for questions, concerns and suggestions to be made without identifying themselves. We provide several confidential mechanisms for reporting, including a 24-hour phone number and a mailing address. A Hotline Steering Committee comprising Security, Audit, Law and Human Resources personnel reviews all reports of suspected violations.

In addition, our Whistleblower's Protection Policy is available at [www.exxonmobil.com.au](http://www.exxonmobil.com.au) to ensure that individuals who report misconduct or disclose any improper state of affairs or circumstances can do so safely, securely and with confidence that they will be protected and supported.

#### 4. Closing

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The Reporting Entities have prepared this Modern Slavery Statement in relation to the financial year 1 January – 31 December 2022, in line with the requirements of the Australian Modern Slavery Act 2018 (Cth).

We are committed to respecting human rights as a fundamental principle in our operations.

This Modern Slavery Statement will be made available at [www.exxonmobil.com.au](http://www.exxonmobil.com.au) and be reviewed annually.

Signed by



Director of each of the Reporting Entities

