
Modern Slavery Statement

Statement for 2019

A photograph of three workers in hard hats and safety gear standing on a construction site at sunset. The sun is low on the horizon, creating a bright lens flare effect. The workers are silhouetted against the bright sky. The worker on the left is wearing a white hard hat and a light-colored shirt. The worker in the middle is wearing a white hard hat and an orange safety vest. The worker on the right is wearing a green hard hat and a high-visibility safety vest. In the background, there are construction materials and a building.

Santos

Disclosure note

This Statement has been made on behalf of Santos Limited (Santos). This Statement covers all entities within the Santos Limited group structure. See page 111-112 of our 2019 Annual Report for a listing of all entities. Each entity is covered by Santos' policies, procedures and systems, including those relating to contracting, purchasing and human resources.

Santos is a participant with a 30% interest in the GLNG Project and provides procurement services to Gladstone LNG Operations Pty Ltd (GLNG OPL), the operator of the GLNG Facility. The assessment of modern slavery risks in Santos' supply chain, as described in this Statement, includes suppliers procured by Santos on behalf of GLNG OPL.

In October 2019 Santos announced an agreement to acquire ConocoPhillips' northern Australia business including operatorship of the Bayu-Undan/Darwin LNG (DLNG) project. Completion of this transaction occurred in May 2020, and therefore for the purpose of this Statement these assets and associated operations are included as non-operated assets.

The modern slavery risks and impacts associated with projects which Santos does not operate, such as Santos' joint venture operations in Papua New Guinea are not included in this Statement. Santos does, however, have joint venture governance processes that involve regular engagement with joint venture partners and operators on key risks and their management, including human rights.

Modern slavery risks and impacts have not been assessed in jurisdictions where Santos may still have a presence but does not actively operate, including Bangladesh, Vietnam and Singapore.

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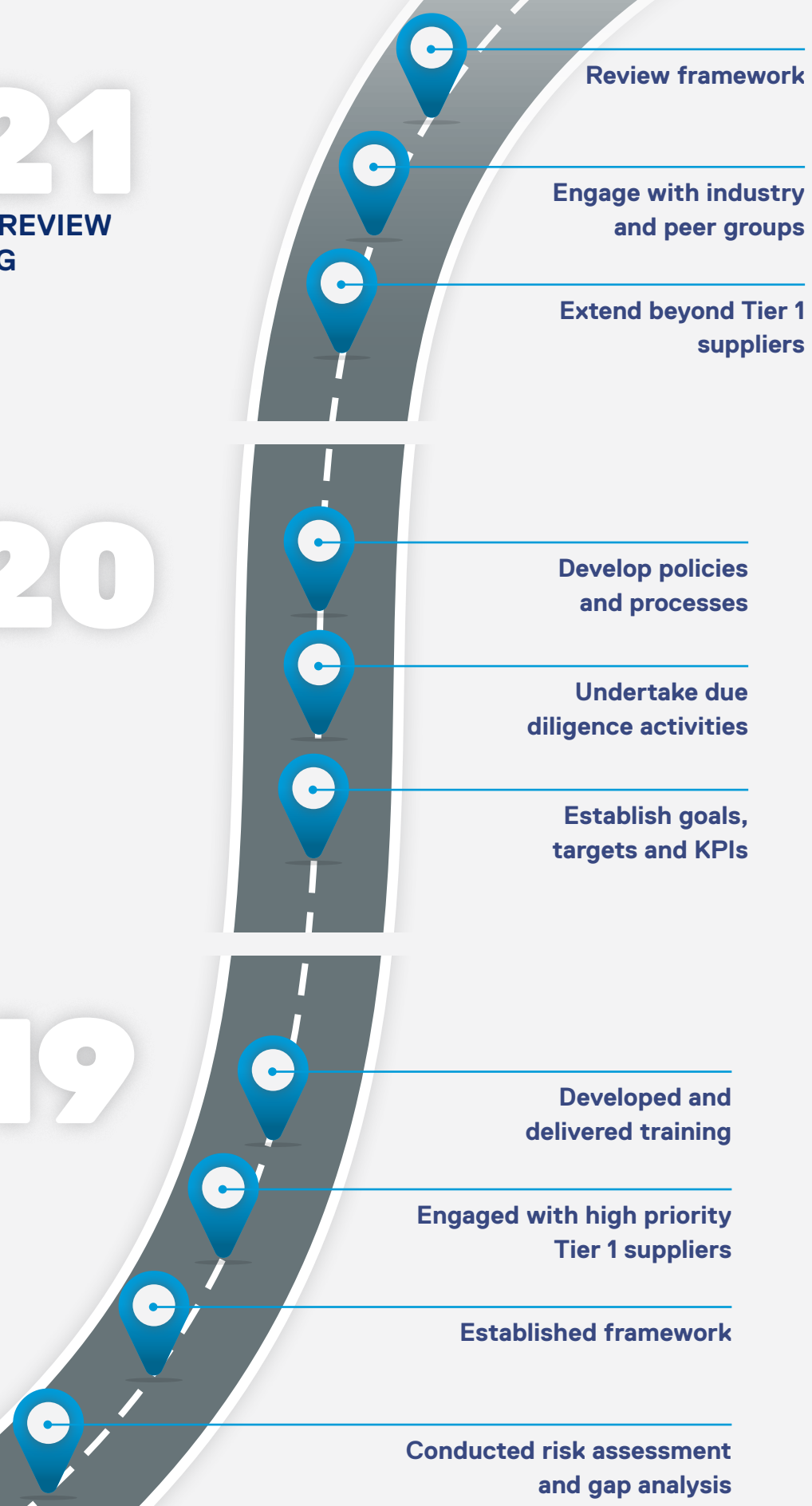
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Road map snapshot

2021
EFFECTIVENESS REVIEW
AND MONITORING

2020
MONITORING

2019
FRAMEWORK



Review framework

Engage with industry
and peer groups

Extend beyond Tier 1
suppliers

Develop policies
and processes

Undertake due
diligence activities

Establish goals,
targets and KPIs

Developed and
delivered training

Engaged with high priority
Tier 1 suppliers

Established framework

Conducted risk assessment
and gap analysis

About us

A proudly Australian company, Santos Limited (Santos) is listed on the ASX. Santos is a leading supplier of natural gas, a fuel for the future providing cleaner energy to improve the lives of people in Australia and Asia. Santos aims to be Australia's leading domestic gas supplier and a leading Asia-Pacific LNG supplier. Santos provides secure, high skilled jobs for 2000+ employees in locations around Australia.

Our purpose

Our purpose is to supply reliable, affordable and cleaner energy to improve the lives of people in Australia and Asia and provide sustainable returns for our shareholders.

Company values

Our values inform the behaviours, leadership attributes and decision-making of all Santos employees.

These values are:



Work as one team

- + Value diverse perspectives
- + Challenge respectfully then get behind the decision
- + Unite and share learnings



Always safe

- + Plan work to protect all from harm
- + Be skilled and competent
- + Understand the risks, controls and barriers
- + Follow the rules and respond to change
- + Speak up
- + Step back, think and be ready



Act with integrity

- + Act ethically and do the right thing
- + Value our customer relationships
- + Confront the facts
- + Treat people with respect



Be accountable

- + Do what we say we are going to do
- + Take responsibility for our actions
- + Be disciplined about meeting requirements and standards
- + Learn from success and failure



Pursue exceptional results

- + Deliver value for our stakeholders
- + Be decisive about what we can do better
- + Recognise and reward achievement
- + Strive for constant improvement
- + Enable innovation



Build a better future

- + Leave a positive legacy
- + Invest in our people
- + Have a positive impact in our communities
- + Protect the environment
- + Be health and safety champions

2019 modern slavery risk management initiatives



Modern slavery working group:

We formed a working group comprised of senior representatives from our procurement, supply chain, commercial, risk and audit, legal, sustainability and public affairs functions.

Operational gap analysis:

We undertook an internal gap analysis to identify areas for improvement to enable us to better assess and address our modern slavery risks.

Modern slavery action plan and road map:

We developed a 12-month action plan and three-year road map which include actions for improving modern slavery governance and due diligence, risk management, supply chain management, communications and training.

Supplier risk identification and prioritisation:

We reviewed and prioritised almost 300 of our highest spend suppliers (those above \$1 million) against modern slavery risk indicators and identified 10 high risk procurement categories.

Supplier surveys:

We conducted due diligence of our highest priority suppliers and we continue to engage these suppliers on modern slavery risk management commitments.

Education and training:

We engaged a human rights specialist to conduct a modern slavery training workshop with our working group and have rolled out additional training to our senior leaders and procurement staff.

Risk management framework:

We have updated our risk assessment framework to incorporate modern slavery risk, including identifying potential causes, consequences (to workers and our business), preventative controls and mitigating controls.

Santos Code of Conduct:

We have updated our Code of Conduct to outline our values and document the expectations we have of our organisation and business partners in the areas of human rights and modern slavery, which is in addition to our existing expectations in respect of ethical and lawful business conduct.

Santos COVID-19 response

The coronavirus (COVID-19) pandemic and subsequent economic downturn occurred during preparation of this statement. While outside of this reporting period, we believe the Santos response is relevant.

Santos enacted a comprehensive response plan focussed on the safety and wellbeing of staff and contractors, business continuity and management of the economic impacts.

Santos acknowledges the Australian Government's advice that 'factory shutdowns, order cancellations, workforce reductions and sudden changes to supply chain structures can disproportionately affect some workers and increase their exposure to modern slavery and other forms of exploitation.'

Our supply chain priorities are to maintain supply continuity, proactively engage with suppliers to support a sustainable workforce and to retain required industry skillsets for the future recovery of the economy. Where some supply reductions have been inevitable, Santos has been closely managing the impacts to contractor and subcontractor workforces. In some circumstances, Santos has required contractors to certify full payment to staff and subcontractors when lodging invoices to Santos. In instances where capital expenditure programs were paused, resulting in cancellation of some advanced (long lead time) orders, these have been managed directly with suppliers to minimise impacts, in many cases deferring orders in preference to cancellation.

Santos continues to proudly support local procurement and local communities.

Our plans for 2020



Ongoing due diligence:

We will continue our progressive roll out of supplier surveys and desktop assessments, incorporate modern slavery contract clauses into existing and new contracts, work with joint venture partners to review risks in international operations and embed modern slavery risk management into existing operational systems and processes.

Review risk in lower spend categories:

We will review and prioritise our lower spend Tier 1 (direct) suppliers against modern slavery risk indicators.

Capability building:

We will continue to deliver modern slavery risk management training to staff.

Supplier engagement:

We will develop our supplier engagement and communications strategy and conduct engagement and awareness-raising initiatives with Tier 1 suppliers.

Modern slavery procedure:

Our crisis management plan will be updated to include a response mechanism for modern slavery.

Remedy pathway:

We will explore peer benchmarks for remedy pathways and consider advocating an industry approach.

External reporting/whistleblower hotline:

We will promote our confidential reporting hotline for workers, including those working for our contractors and suppliers, to freely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct.

Our plans beyond 2020



Continuous improvement:

We will continue to review and improve our due diligence, risk management, training and supplier engagement systems and processes to ensure modern slavery risks are effectively managed and mitigated.

Supplier monitoring:

We will establish and implement specific supplier monitoring programs for our highest risk suppliers.

Supply chain mapping beyond Tier 1:

We will work with our highest priority Tier 1 suppliers to map the next tier of suppliers against geographic, commodity and industry modern slavery risk indicators.

Effectiveness review:

We will review the effectiveness of actions taken to identify, assess and address modern slavery risks and incorporate outcomes-focused performance indicators into review processes.

Organisational growth:

We will extend our modern slavery initiatives to assets and operations purchased from ConocoPhillips.



Statement from CEO and Board Chair



For 65 years, Santos, a proudly Australian company, has been safely and sustainably exploring and developing oil and natural gas resources in partnership with local communities, landholders and stakeholders to supply reliable, affordable and cleaner energy. Santos is now pleased to present our first ever Modern Slavery Statement, further demonstrating our commitment to sustainable development of resources and to improving the lives of people in Australia and Asia.

The term modern slavery is used to describe a range of exploitative practices including human trafficking, forced labour, child labour, and where threats or deception are used to exploit victims and undermine or deprive them of their freedom. Tackling modern slavery is a difficult issue which requires continuous commitment and ongoing focus. With that, we have chosen to publish our first ever Modern Slavery Statement in advance of the compulsory reporting date to demonstrate our commitment and to communicate our 12 month action plan and 3 year road map.

This statement has been approved by the Board of Santos Limited.

Signed

Keith Spence
Chairman

Kevin Gallagher
Managing Director and Chief
Executive Officer

June 2020

Reporting criteria 1 & 2

About Santos

Our organisational structure



Santos Limited (Santos) is an Australian public company, employing 2000+ people, listed on the Australian Securities Exchange under the code STO. The Australian Company Number for Santos Limited is **ACN 007 550 923**. The registered office for Santos Limited is Ground Floor, Santos Centre, 60 Flinders Street, Adelaide SA 5000.

Our operations focus on the exploration, development, production and marketing of natural gas and other petroleum products both onshore and offshore in Australia. In 2019 we also participated in non-operated joint ventures in Papua New Guinea (PNG) where we are a joint venture partner in the PNG LNG project operated by ExxonMobil.

Controlled entities:

A list of our controlled entities is available in our 2019 Annual Report. In 2019, the majority of Australian employees were employed by Santos Limited. Employees not employed by Santos Limited were those few remaining employees associated with our residual international interests and 319 Australian employees employed by Santos WA Energy Ltd (following Santos' acquisition of Quadrant Energy in 2018). Apart from these few exceptions, the controlled entities did not employ employees, but held participating interests in our projects and perform activities such as entering into contracts and holding licences and permits for our operations. The controlled entities all operate under the direction and governance of Santos Limited and share the same executive management.



Joint arrangements

Our investments in joint arrangements are classified as either joint operations or joint ventures depending on the contractual rights and obligations each investor has, rather than the legal structure of the joint arrangement. Our exploration and production activities are often conducted through joint arrangements governed by joint operating agreements, production sharing contracts or similar contractual relationships.

This includes:

- + Oil and gas assets – producing assets
- + Exploration and evaluation assets
- + Joint ventures

Our organisational structure (cont.)



Our organisational structure (cont.)

Our governance framework

The Santos Board and all levels of management are committed to maintaining and enhancing a strong corporate governance framework that underpins our vision to be Australia's leading natural gas company by 2025. Anti-slavery initiatives are overseen by the Environment, Health, Safety and Sustainability Committee of the Board. The Committee's duties comprise the governance and review of our activities in the areas of Environment, Health and Safety, Climate Change, Anti-Slavery, Land Access, Indigenous Engagement and Cultural Heritage and Community Engagement.

In relation to modern slavery risk management the Committee's duties include policy review, monitoring effectiveness of the management system and risk framework, maintaining corporate knowledge of risks relevant to modern slavery, as well as reporting and making recommendations to the Santos Board as required.

We support the intent and purpose of the ASX Corporate Governance Council's Principles and Recommendations (ASX Principles) and meet the specific requirements of the 3rd Edition, as outlined in our 2019 Corporate Governance Statement. We are already compliant with the new recommendations and suggestions contained in the 4th Edition of the ASX Principles and will report against this edition in our 2020 Corporate Governance Statement.

A list of our publicly-available core governance framework documents set out against the relevant ASX Principles is provided in our [2019 Corporate Governance Statement](#). The majority of these documents are accessible on our website.

Our people

Santos has 2000+ employees working across our operations. Santos continues to attract quality recruits and our 2020 graduate, apprenticeship and trainee programs attracted exceptional talent. Female representation is strong across all programs, accounting for 60% of our apprenticeship intake and 50% of our traineeship intake. Forty-five per cent of the 2019 graduate intake were female, the highest proportion since the program was launched.

In 2019, to continue to attract and retain talent within the organisation and support employees to better balance work and family life, we increased our paid parental leave and introduced a childcare subsidy. This initiative builds on our leadership in this area, having introduced paid maternity leave over a decade ago, and being the first, and still one of only a few companies in the resources sector to offer 'superannuation top-ups' for periods of unpaid maternity leave.

Our operations



Our operations focus on exploration, development, production, transportation and marketing of natural gas and other petroleum products both onshore and offshore in Australia. These products are sold to customers in Australia and Asia.

Five core long-life natural gas assets sit at the heart of our business: Western Australia, the Cooper Basin, Queensland and New South Wales, Northern Australia and Timor-Leste, and Papua New Guinea. Each of these asset hubs has unique risks which are captured by our integrated risk framework. Combined with our supplier risk prioritisation and assessment process and stakeholder engagement initiatives, we can identify, assess and address potential modern slavery risks on an ongoing basis.

Western Australia

Santos is one of the largest producers of natural gas for the domestic market in Western Australia and is also a significant producer of oil and natural gas liquids. In late 2018, Santos completed the acquisition of Quadrant Energy which has significantly strengthened Santos' position in Western Australia,

including 100% ownership and operatorship of the Varanus Island and Devil Creek domestic gas hubs, and a leading position in the highly prospective Bedout Basin. The successful integration of Quadrant Energy into the Santos business over the course of 2019 transformed the scale of our operations in Western Australia and also significantly strengthened our offshore operating expertise and capabilities

Cooper Basin

The Cooper Basin in Queensland and South Australia produces natural gas as well as oil and natural gas liquids. Natural gas is sold to the east coast domestic market and also to liquefied natural gas (LNG) projects for sale into Asia. Liquids and oil are sold in both domestic and export markets.

Queensland and New South Wales

Santos is a participant with a 30% interest in the GLNG Project which was one of the world's first coal seam gas to LNG projects. LNG is sold into Asian markets. Some natural gas is also sold into the east coast domestic market. GLNG has two LNG trains at

Our operations (cont.)

Gladstone with a combined capacity of 8.6 mtpa. Feed gas is sourced from GLNG’s own upstream production and from other gas producers. Santos is the developer of the proposed Narrabri Gas Project in NSW. One hundred per cent of Narrabri gas will be sold into the east coast domestic gas market.

Papua New Guinea

Santos’ business in Papua New Guinea (PNG) is centred on the PNG LNG Project. Commencing in 2014, PNG LNG produces LNG for the Asian market, as well as some liquids. Santos has a 13.5% interest in PNG LNG. The LNG plant near Port Moresby has two LNG trains with combined capacity of more than 8 mtpa. Santos also has some interests in upstream acreage in PNG which will be explored and developed to support our interests in PNG LNG.

Northern Australia and Timor-Leste

In 2019, Santos’ business in Northern Australia and Timor-Leste was focused on the Bayu-Undan/Darwin LNG (DLNG) project, operated by ConocoPhillips. In operation since 2006, DLNG produces LNG and natural gas liquids for Asian markets. In 2019 Santos had an 11.5% interest in DLNG. The LNG plant near Darwin has a single LNG train with a capacity of 3.7 mtpa.

Refer to the disclosure note on page 2 regarding Santos’ acquisition of ConocoPhillips’ northern Australia business.

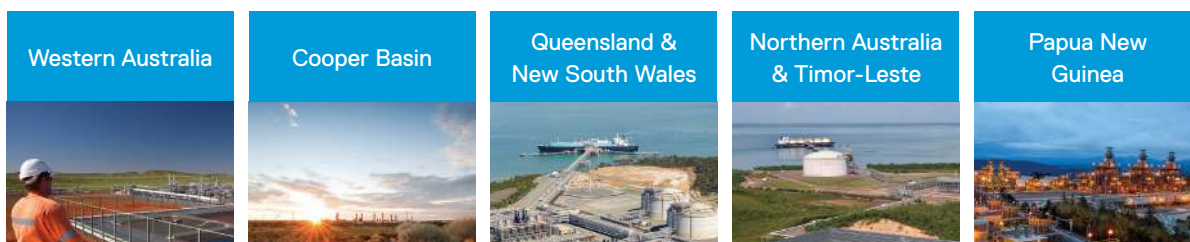
Santos also has interests in other upstream acreage onshore and offshore northern Australia which will be explored and developed to support both domestic markets and our interests in LNG projects in Australia.

WHAT WE DO



WHERE WE DO IT

Our five core long-life natural gas asset hubs



HOW WE MANAGE MODERN SLAVERY RISK



Our supply chain



As an oil and gas company, our direct supply chain consists primarily of large oil and gas field engineering, construction and technical services companies, marine logistics and transportation, specialist consultancies and labour and corporate services.

What we buy:

- + Engineering, construction and fabrication services
- + Drilling, process and wellhead equipment
- + Wellsite services
- + Energy and utilities (including fuel)
- + Maintenance spares and services
- + Electronics and electrical equipment
- + Operations support services including remote accommodation and catering services
- + Labour and corporate services

In 2019 we had ~650 active contracts and \$2.56 billion in procurement spend with Tier 1 (direct) suppliers where annual spend is >\$1m. We have established long-term relationships with most of our suppliers, the majority of which are located in Australia and comprise 96% of our total expenditure. In Australia, 80% of our procurement spend is with 100 suppliers.

In addition to our Australian suppliers, 4% of our procurement spend is with Tier 1 suppliers operating in 29 countries, and of these 99% are concentrated to nine countries:

- + United States
- + Canada
- + United Kingdom
- + Singapore
- + Thailand
- + Denmark
- + Netherlands
- + Norway
- + Hong Kong

Our Supply Chain: Key statistics

\$2.56bn Spend with suppliers where annual spend is >\$1m

4,000 suppliers

~650 active contracts

21 categories

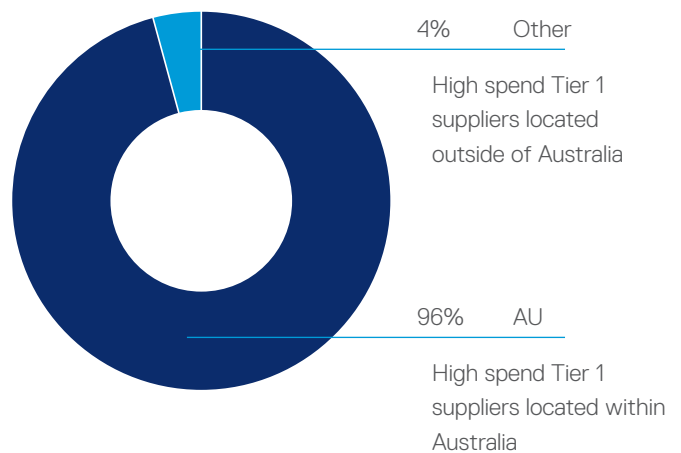
Our Supply Chain: International procurement

29 purchase directly from 29 countries

96% of high-spend Tier 1 suppliers are located in Australia

4% of remaining Tier 1 suppliers are located in 29 countries. Of these, 99% are concentrated to nine countries

Spend by country origin



Reporting criteria 3

Modern slavery risks in operations and supply chain

Santos sustainability pillars

1

Climate change

2

Community

3

Economic sustainability

4

Environment

5

Health and safety

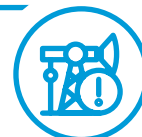
6

Indigenous partnerships

7

People and culture

Operational risks



For 65 years we have been safely and sustainably exploring and developing oil and natural gas resources in partnership with local communities, landholders and marine users. We comply with all labour, employment, immigration and whistleblower laws of Australia, across all states and territories, including the Fair Work Act. We are committed to:

- + Working safely and looking out for the safety of our colleagues
- + Providing a workplace free from harassment, discrimination and bullying
- + Acting ethically and lawfully in all business conduct
- + Engaging with our stakeholders respectfully and honestly
- + Building sustainable communities through providing local jobs, developing local skills and providing local business opportunities

We have an internal audit program to assure the effectiveness of our risk control framework and compliance with our policies.

While we consider the potential for us to cause or contribute to incidents of modern slavery to be low, areas of vulnerability in our operations include outsourced services such as cleaning, catering, security and facilities management, and use of labour hire contractors.

Supply chain risks



In 2019 we engaged external expertise to assist us in assessing the potential supplier risks across our highest spend categories (all suppliers above \$1 million in spend were reviewed and prioritised). Potential risks for modern slavery were determined according to the following indicators:

- + Industry sector – specific industry sectors deemed as high risk in international and national guidance documentation
- + Commodity/product – specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials
- + Geographic location – based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters

Our operations (cont.)

- + Workforce profile – in undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous)

Based on the above indicators, we identified the following potentially high-risk spend categories:

- Building / construction / fabrication**

- Maintenance services**

- Consumables / materials**

- Logistics – transport / marine**

- Catering and hospitality**

- Labour hire**

- Waste management**

- Real estate / facility management**

- ICT hardware**

- Security services**

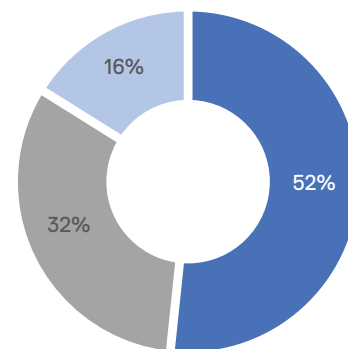
While the risk of modern slavery in Australia is lower than many other jurisdictions (according to GSI data), we recognise that our Australian suppliers (who make up 80% of our procurement spend) provide us with goods and services across all high-risk categories and therefore will require further engagement and assessment. High-risk goods and services across building / construction / fabrication, consumables, logistics and labour hire categories are also procured directly from some of our international suppliers in 29 countries, predominantly across Europe and North America.

Our focus in 2019 has been on our highest spend suppliers (>\$1m), however we acknowledge that lower spend suppliers also present modern slavery risks and vulnerabilities. It is our intention to undertake a broader review and risk prioritisation of our lower spend suppliers in 2020.

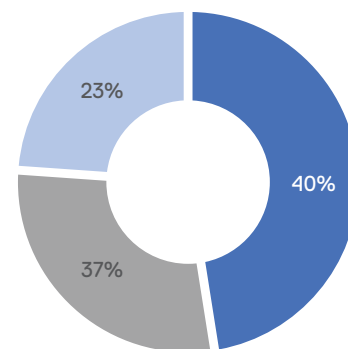
We are undertaking further work to understand the vulnerabilities and potential modern slavery risks in Papua New Guinea (PNG) where we are a joint venture partner in an operation managed by ExxonMobil. While we don't have any direct high-risk suppliers in PNG, we are aware that there is an increased vulnerability to modern slavery in PNG. We are working with our joint venture partner to better understand the supply chain and review supplier modern slavery risks relating to that operation.

Our company spend, supplier and category risk prioritisation work will inform our ongoing modern slavery risk management and supplier engagement and review program for 2020 and beyond. We recognise modern slavery risk management as a challenging and evolving process and aim for continuous improvement. The charts included below provide an overview of our potential high-risk profile across spend, our Tier 1 suppliers (above \$1 million in spend) and our procurement categories. Based on this analysis we have started to engage with and survey our highest priority suppliers across our highest risk categories. This work will continue throughout 2020.

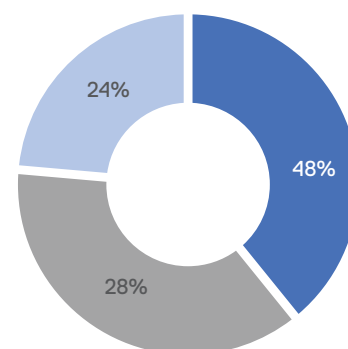
Risk by spend (~600 suppliers / ~650 contracts)



Risk by supplier percentage

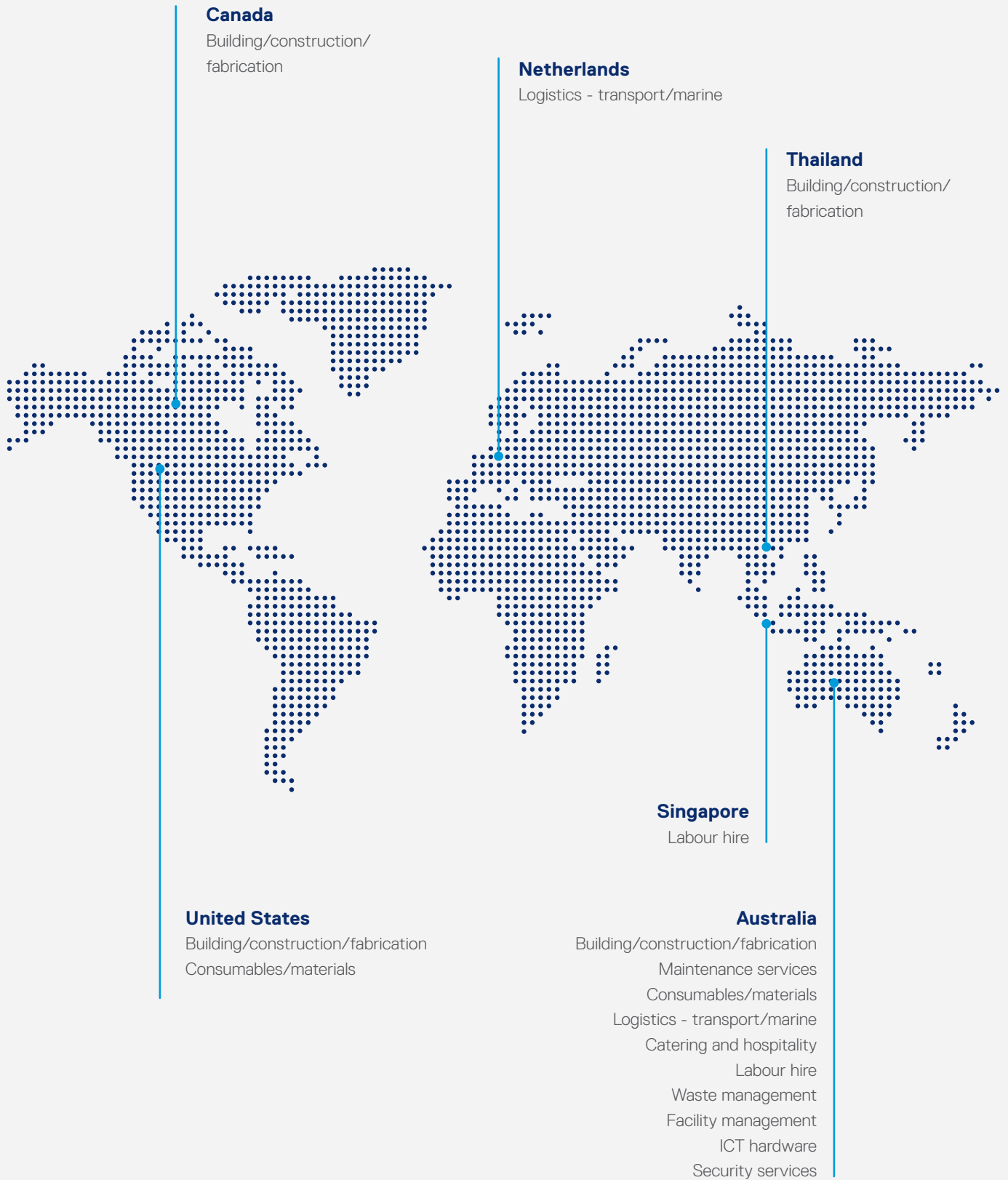


Risk by supplier category



■ High ■ Low ■ Medium

High risk categories (above \$1M spend) by geographic location



Reporting criteria 4

Actions taken to assess and address risk

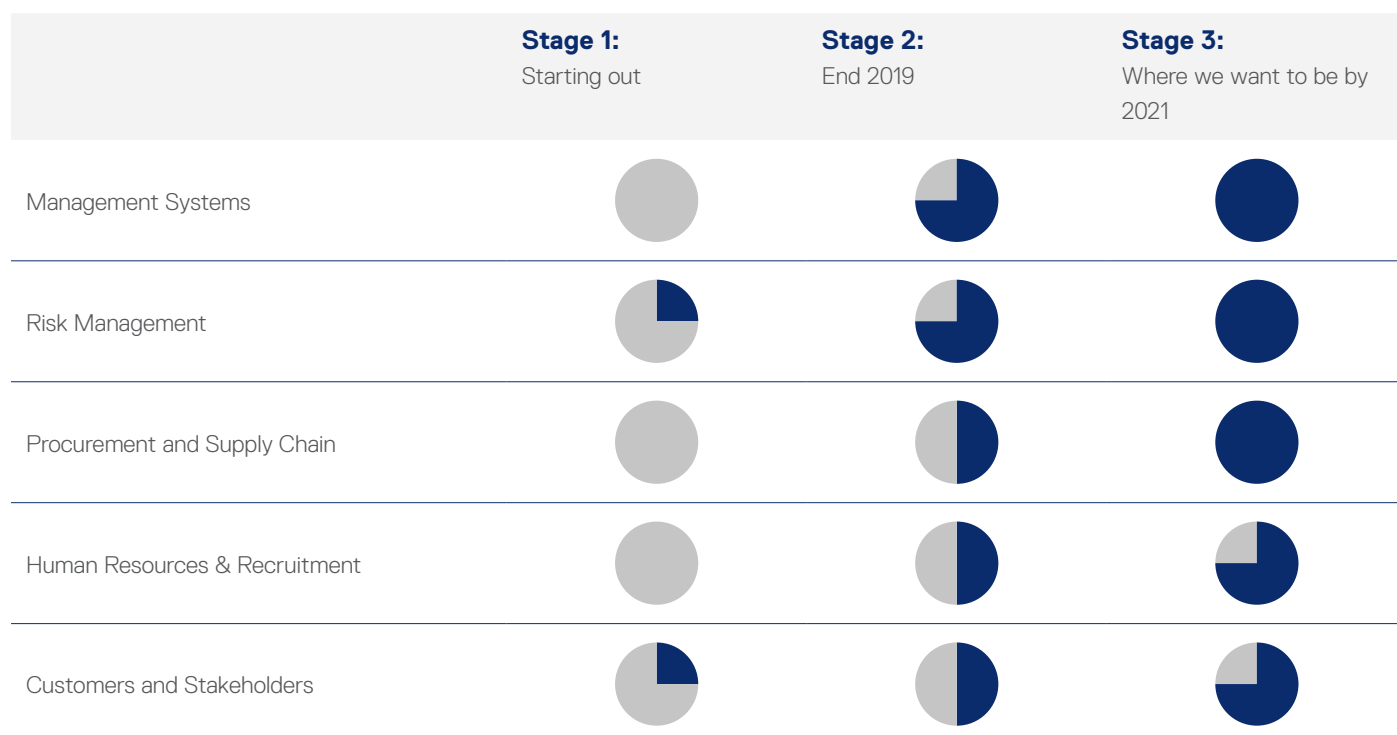
Our focus in 2019 was to strengthen our understanding of potential modern slavery risks in our operations and supply chain. With the support of external human rights and sustainability specialists, we undertook a number of key activities which have formed the basis of our modern slavery action plan and supplier risk assessment process. These activities are outlined below.

Modern slavery working group:

Recognising that management of modern slavery risks across our operations and supply chain cannot be effectively addressed by one division within our company, we formed a working group comprised of representatives from procurement, supply chain, commercial, risk & audit, legal, sustainability, human resources and public relations. Through our Sustainability Working Group there is a quarterly review of progress on our modern slavery action plan and due diligence processes.

Operational gap analysis:

We undertook an internal gap analysis to collaboratively identify areas for improvement across five key categories: management systems, human resources and recruitment, procurement and supply chain, risk management, and customers and stakeholders. The analysis provided insight into our governance maturity specific to modern slavery, and identified gaps and opportunities for better managing our response to modern slavery risks and human rights due diligence more broadly.



Actions taken to assess and address risk (cont.)

Modern slavery action plan and road map:

The outcomes of the operational gap analysis informed our modern slavery action planning process. Our cross-disciplinary team worked collaboratively to develop a focused 12-month action plan and a three-year modern slavery road map. These include actions for enhancing our approaches to modern slavery governance and due diligence, risk management, supply chain management, communications and training.

Supplier risk identification and prioritisation:

We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and identified 10 high risk procurement categories. This has enabled us to focus our supplier due diligence processes on our highest risk suppliers.

Supplier surveys:

We conducted more extensive due diligence of our highest priority suppliers through an initial high-level supplier survey. Analysis of supplier responses is informing our continued engagement with, and risk management expectations of, these suppliers. We value the partnerships we have formed with our suppliers and will continue to work with them to ensure we effectively assess, address and remedy modern slavery risks and impacts.

Education and training:

We engaged an external sustainability and human rights specialist to conduct a half-day modern slavery training workshop with our Modern Slavery Working Group which provided an overview of modern slavery, the legislative requirements, relevance to our industry sector and actions for assessing and addressing risks. We have delivered additional modern slavery risk-based training to our senior operations leaders and procurement staff.

Risk management framework:

In 2019, we completed a comprehensive review of our risk management framework with reference to the most recent revision of the International Standard for Risk Management (ISO 31000:2018 Risk Management Guideline). As part of the review process the corporate risk framework informed the development of our modern slavery risk assessment process.

This includes identifying potential causes of modern slavery, assessing consequences (to workers and to our business), and identifying preventative and mitigating controls.

Santos Code of Conduct:

We have updated our Code of Conduct to outline our values and document the expectations we have of our organisation and business partners in the areas of human rights and modern slavery, in addition to our existing expectations in respect of ethical and lawful business conduct.

External reporting/whistleblower hotline:

Recognising the importance of giving a voice to all workers, including those working for our contractors and suppliers, we continue to provide an independent confidential external hotline to ensure workers can freely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct and to protect workers from reprisal or victimisation.

While no incidents of modern slavery or exploitation were reported in 2019, we will ensure our external reporting/whistleblower hotline remains legitimate, accessible, transparent and rights compatible, and that it is a source of continuous learning for us and for our stakeholders. Where incidents of modern slavery or slavery-like practices are reported, we will work with our suppliers and other stakeholders to ensure a victim-centred response is implemented.

Modern slavery actions road map









Actions for Year 1	Actions for Year 2	Actions for Year 3
Working group established	Establish goals, targets and KPIs for managing modern slavery risks	Establish monitoring mechanisms for reviewing risk management effectiveness
Gap analysis completed and action plan developed	Develop procedures for reporting and responding to incidents of modern slavery	Review Santos' risk framework in context of human rights issues and risks
Governance framework including executive engagement, roles, responsibilities and accountabilities established	Incorporate supplier performance standards and effectiveness evaluation criteria into new high-risk contracts	Extend modern slavery risks and vulnerabilities mapping to additional supply chain tiers for high priority categories and or specific suppliers
Risk management framework updated and risk management plan developed	Publish Santos' updated Code of Conduct	Implement robust due diligence and continuous improvement processes for addressing modern slavery risks
Tier 1 supply chain risks mapped	Extend supply chain risk mapping to Tier 2 for high risk categories	Engage with industry and peer groups to benchmark performance
Supplier engagement strategy developed. Awareness and expectations communications distributed to priority Tier 1 suppliers	Promote whistleblower hotline via Santos website and other supplier communications	
Labour hire contracts assessed and updated through tendering process	Complete screening of high risk suppliers via desk-top assessment process	
Board of Directors engaged and educated on modern slavery risk management program	Update supplier qualification process to include modern slavery risk review	
Modern slavery TNA completed. Training developed and delivered	Identify opportunities for sector collaboration and innovation	
	Develop a modern slavery incident response plan and append to Santos' management procedures	
	Update contract management requirements	
	Publish Santos' position on modern slavery on the Santos website	
	Collaborate with relevant joint venture parties to obtain assurance for supply chains operated by partners for Santos' benefit	
	Extend modern slavery initiatives to newly acquired assets	

Reporting criteria 5

Effectiveness assessment

Our modern slavery risk management action plan and due diligence processes will be reviewed regularly as part of our corporate sustainability and risk management review processes. Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain. For the first reporting period we have assessed the effectiveness of our actions against the following key process indicators:

Indicator/target 2019	Outcome	
	Progressing	Achieved
Requirements of Modern Slavery Act outlined to the Board		
100% of operational executive and senior leaders engaged on the issue		
100% of supply chain staff trained on modern slavery risks		
Year 1 modern slavery risk-management actions implemented		
100% of identified high-risk suppliers (<\$1M spend) engaged		
Standard contract templates updated	 Commenced	

Reporting criteria 6

Process of consultation with owned or controlled entities

A list of our controlled entities is available in our 2019 Annual Report. In 2019, the majority of Australian employees were employed by Santos Limited. Employees not employed by Santos Limited were those few remaining employees associated with our residual international interests and 319 Australian employees employed by Santos WA Energy Ltd (following Santos' acquisition of Quadrant Energy in 2018). Apart from these few exceptions, the controlled entities did not employ employees, but held participating interests in our projects and perform activities such as entering into contracts and holding licences and permits for our operations. The controlled entities all operate under the direction and governance of Santos Limited and share the same executive management.

Contact us

Head office
Ground Floor Santos Centre
60 Flinders Street
Adelaide South Australia 5000

GPO Box 2455
Adelaide South Australia 5001

Telephone: +61 8 8116 5000

Email: santos.general.enquiries@santos.com

www.santos.com