

2020 - 21 Compliance Program

Submitted by:

Santos Limited (ABN:80007550923)



#Workplace overview

Policies and strategies

1: Do you have a formal policy and/or formal strategy in place that specifically supports gender equality in the following areas?

...Recruitment	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Retention	Yes(<i>Select all that apply</i>)
...Yes	Strategy
...Performance management processes	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Promotions	Yes(<i>Select all that apply</i>)
...Yes	Strategy
...Talent identification/identification of high potentials	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Succession planning	Yes(<i>Select all that apply</i>)
...Yes	Strategy
...Training and development	Yes(<i>Select all that apply</i>)
...Yes	Policy Strategy
...Key performance indicators for managers relating to gender equality	Yes(<i>Select all that apply</i>)
...Yes	Strategy

2: Do you have formal policy and/or formal strategy in place that support gender equality overall?

Yes(*Select all that apply*)

...Yes	Policy Strategy
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3: If your organisation would like to provide additional information relating to your gender equality policies and strategies, please do so below.

Santos is committed to continuing our journey to grow an inclusive culture that promotes inclusion, diversity and difference of thought.

The Santos Diversity and Inclusion Policy reinforces our commitment to grow an inclusive workplace culture that recognises the value that diverse teams bring to safety, performance and delivery.

Santos' Executive Committee monitors people demographics through a quarterly Diversity and Inclusion report. Our Diversity and Inclusion initiatives are built around the following pillars:

- + Aware: Leader led awareness and understanding that respecting the unique characteristics and qualities that all employees bring to the workplace, drives a high performing, inclusive and innovative culture
- + Fair: Ensuring and maintaining fair and equitable work practices, free of bias, throughout the employee lifecycle
- + Enable: Representation and workforce pathways to reflect Santos' employment communities

Governing bodies

Santos Limited

1: Does this organisation have a governing body?	Yes(<i>Provide further details on the governing body(ies) and its composition</i>)
1.1: What is the name of your governing body?	Santos Limited
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
...Chairs	
...Female (F)	0
...Male (M)	1
...Gender X	0
...Members	
...Female (F)	3
...Male (M)	4
...Gender X	0
1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes(<i>Select all that apply</i>)
	Policy
1.5: Has a target been set to increase the representation of women on this governing body?	Yes(<i>Provide further details on your target</i>)
10.6: What is the percentage (%) target?	30.00%
10.7: What year is the target to be reached (select the last day of the target year)?	31-Dec-2021

2: If your organisation would like to provide additional information relating to governing bodies and gender equality in your workplace, do so below.

The gender composition of our Board of Directors of 3 females and 5 males reflects our position at 31 March 2021.

Our measurable objective is to maintain at least 30% for each gender on the Board.

#Action on gender equality

Gender pay gaps

1: Do you have a formal policy and/or formal strategy on remuneration generally?

Yes (*Select all that apply*)

...Yes	Policy Strategy
1.1: Are specific pay equity objectives included in your formal policy and/or formal strategy?	Yes (<i>Select all that apply</i>)
...Yes	To achieve gender pay equity To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews) To ensure managers are held accountable for pay equity outcomes To implement and/or maintain a transparent and rigorous performance assessment process Other (provide details)
...Other (provide details)	To ensure no gender bias occurs when determining performance ratings and annual short term incentive outcomes

2: Did your organisation receive JobKeeper payments?

Yes

2.1: Please indicate which months in the reporting period your organisation received JobKeeper payments:

.. April 2020	Yes
...May 2020	Yes
...June 2020	Yes
...July 2020	Yes
...August 2020	Yes
...September 2020	Yes
...October 2020	No
...November 2020	No
...December 2020	No
...January 2021	No
...February 2021	No

...March 2021

No

3: What was the snapshot date used for your Workplace Profile?

31-Dec-2020

4: If your organisation would like to provide additional information relating to gender pay gaps in your workplace, please do so below.

The annual pay equity audit did not identify systemic issues and resulted in only minor adjustments to a small number of employees. Analysis is performed to ensure that no gender bias in the allocation of performance ratings as performance ratings are a primary input into the bonus and salary review processes. The annual bonus and salary review processes include a review of bonuses and salary increases awarded. The review looks for any potential gender bias including a review to ensure no discrimination against employees on unpaid parental leave or career breaks.

JobKeeper: At the onset of COVID-19 and to protect our balance sheet, cash flows and retention of our permanent employees, as a precaution Santos applied for and received circa \$4 million in JobKeeper payments up to September 2020 for employees of Santos WA Energy Limited (a subsidiary company of Santos Limited). By November 2020, it was clear the impact of COVID-19 on Santos would be less than expected so, in line with community expectations, Santos repaid the amount in full to the Australian government during December 2020.

Employer action on pay equity

1: Have you analysed your payroll to determine if there are any remuneration gaps between women and men (e.g. conducted a gender pay gap analysis)?

Yes(*Provide further details on the most recent gender remuneration gap analysis that was undertaken.*)

1.1: When was the most recent gender remuneration gap analysis undertaken?

Within the last 12 months

1.2: Did you take any actions as a result of your gender remuneration gap analysis?

Yes(*Select all that apply*)

1.2: Did you take any actions as a result of your gender remuneration gap analysis?

.. Yes

Created a pay equity strategy or action plan
Identified cause/s of the gaps
Reviewed remuneration decision-making processes
Analysed commencement salaries by gender to ensure there are no pay gaps
Analysed performance pay to ensure there is no gender bias (including unconscious bias)
Analysed performance ratings to ensure there is no gender bias (including unconscious bias)
Reported pay equity metrics (including gender pay gaps) to the governing body
Reported pay equity metrics (including gender pay gaps) to the executive
Trained people-managers in addressing gender bias (including unconscious bias)
Corrected like-for-like gaps

<p>1.3: You may provide details below on the type of gender remuneration gap analysis that has been undertaken (for example like-for-like and/or organisation-wide)</p>	<p>The annual Gender Pay Equity Audit complements gender bias checks which are built into Santos' performance and remuneration processes.</p> <p>The annual audit is a detailed analysis which considers:</p> <ul style="list-style-type: none"> - Equal Pay (same role / same pay) - New hire remuneration - Performance ratings and Short-Term Incentive allocations - Promotions - Turnover <p>The analysis is split into Non Field, Field White Collar and Field Blue collar, consistent with the way Santos analyses gender participation.</p>
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2: If your organisation would like to provide additional information relating to employer action on pay equity in your workplace, please do so below.

Santos graduate salaries in the first three years of employment are covered by a graduate salary model which differentiates pay only on performance.

Employee consultation

1: Have you consulted with employees on issues concerning gender equality in your workplace?
 Yes (*Provide further details on the employee consultation process.*)

<p>1.1: How did you consult employees?</p>	<p>Survey Consultative committee or group Focus groups Exit interviews Performance discussions</p>
<p>1.2: Who did you consult?</p>	<p>ALL staff</p>

2: If your organisation would like to provide additional information relating to employee consultation on gender equality in your workplace, please do so below.

Based on feedback from our regular Pulse and Engagement Surveys, Santos have built our LEAP Framework to describe the expected behaviours across each level and career stage within the organisation. Grounded in our values, the LEAP Framework sets a standard for leadership behaviours at Santos and provides a common language to facilitate the growth

and development of our workforce. Our leadership programs will include a component on inclusivity. The LEAP Behavioural Framework was developed in consultation with internal key focus groups.

In 2021 Santos will be also implementing company wide cultural awareness training.

#Employee work/life balance

Flexible working

1: Do you have a formal policy and/or formal strategy on flexible working arrangements?

Yes(*Select all that apply*)

...Yes	Policy Strategy
...A business case for flexibility has been established and endorsed at the leadership level	Yes
...Leaders are visible role models of flexible working	Yes
...Flexible working is promoted throughout the organisation	Yes
...Targets have been set for engagement in flexible work	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Currently not under consideration
...Targets have been set for men's engagement in flexible work	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Currently not under consideration
...Leaders are held accountable for improving workplace flexibility	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	1-Oct-2021
...Manager training on flexible working is provided throughout the organisation	Yes
...Employee training is provided throughout the organisation	Yes
...Team-based training is provided throughout the organisation	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	1-Oct-2021
...Employees are surveyed on whether they have sufficient flexibility	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Currently not under consideration

...The organisation's approach to flexibility is integrated into client conversations	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Santos is a producer of Oil & Gas, not a service based company
...The impact of flexibility is evaluated (e.g. reduced absenteeism, increased employee engagement)	Yes
...Metrics on the use of, and/or the impact of, flexibility measures are reported to key management personnel	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	1-Oct-2021
...Metrics on the use of, and/or the impact of, flexibility measures are reported to the governing body	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	1-Oct-2021
...Other (provide details)	No

2: Do you offer any of the following flexible working options to MANAGERS in your workplace?

...Flexible hours of work	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Compressed working weeks	No(<i>You may specify why the above option is not available to your employees.</i>)
...No	Other (provide details)
...Other (provide details)	We place greater emphasis on work-life balance, compressed working weeks are not in effect
...Time-in-lieu	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Informal options are available
...Telecommuting (e.g. working from home)	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Part-time work	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)

...SAME options for women and men	Formal options are available
...Job sharing	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Carer's leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Purchased leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available
...Unpaid leave	Yes(<i>Select one option only</i>)
...Yes	SAME options for women and men(<i>Select all that apply</i>)
...SAME options for women and men	Formal options are available

3: Are your flexible working arrangement options for NON-MANAGERS the same as the options for managers above?

Yes

4: Were managers in your organisation allowed to make INFORMAL flexible working arrangements with their team members in response to the COVID-19 pandemic?

Yes, ALL managers

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce compared to pre-COVID-19?

Yes, for both women and men

6: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, please do so below.

A flexible work policy is available on the Santos intranet to raise awareness of workplace support options available to all employees.

#Employee support

Paid parental leave

1: Do you provide employer funded paid parental leave regardless of carer's status (i.e. primary/secondary) in addition to any government funded parental leave scheme?

Yes, we offer employer funded parental leave (using the primary/secondary carer definition)

1.1: Do you provide employer funded paid parental leave for primary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the primary carers.</i>)
1.1.a: Please indicate whether your employer-funded paid parental leave for primary carers is available to:	All, regardless of gender
1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers:	Birth Adoption Surrogacy Stillbirth
1.1.c: How do you pay employer funded paid parental leave to primary carers?	Paying the employee's full salary
1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave?	Yes, on employer funded parental leave
1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided?	18
1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals?	91-100%
1.2: Do you provide employer funded paid parental leave for secondary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the secondary carers.</i>)
1.2.a: Please indicate whether your employer-funded paid parental leave for secondary carers is available to:	All, regardless of gender
1.2.b: Please indicate whether your employer-funded paid parental leave for secondary carers covers:	Birth Adoption Surrogacy Stillbirth
1.2.c: How do you pay employer funded paid parental leave to secondary carers?	Paying the employee's full salary

1.2.d: Do you pay superannuation contribution to your secondary carers while they are on parental leave?	Yes, on employer funded parental leave
1.2.e: How many weeks (minimum) of employer funded paid parental leave for secondary carers is provided?	2
1.2.f: What proportion of your total workforce has access to employer funded paid parental leave for secondary carers, including casuals?	90-100%

2: If your organisation would like to provide additional information relating to paid parental leave and gender equality in your workplace, please do so below.

There were 75 families that took up the recently introduced child-care subsidy where Santos pays 50% of the out-of-pocket childcare expenses for returning primary carers. Our child care subsidy reimburses 50% of out-of-pocket costs after any government rebate up to \$10,000 per child per annum following the return of working parents from parental leave.

We have also expanded our Paid Carer Leave initiative to be an industry leading 18 week paid leave for the primary carer, and two weeks paid leave for the secondary carer. This includes equal access for parents that experience a still birth, and LGBTQI parents.

Employees must have at least 12 months service to be eligible to receive the 18 weeks paid parental leave as primary carer or 2 weeks paid parental leave as secondary carer.

Santos continues to pay superannuation contributions for all employees during any period of unpaid parental leave for up to 12 months following commencement of parental leave. During 2020, \$205,915 in contributions were made to 59 employees on unpaid parental leave.

Support for carers

1: Do you have a formal policy and/or formal strategy to support employees with family or caring responsibilities?

Yes (*Select all that apply*)

...Yes

Policy

2: Do you offer any of the following support mechanisms for employees with family or caring responsibilities?

...Employer subsidised childcare

Yes (*Please indicate the availability of this support mechanism.*)

...Yes

Available at ALL worksites

...On-site childcare

No (*You may specify why the above support mechanism is not available to your employees.*)

...No

Insufficient resources/expertise

...Breastfeeding facilities

Yes (*Please indicate the availability of this support mechanism.*)

...Yes

Available at SOME worksites

...Childcare referral services	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Insufficient resources/expertise
...Internal support networks for parents	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Return to work bonus (only select if this bonus is not the balance of paid parental leave)	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Other (provide details)
...Other (provide details)	Santos provides child care subsidy
...Information packs for new parents and/or those with elder care responsibilities	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Referral services to support employees with family and/or caring responsibilities	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Targeted communication mechanisms (e.g. intranet/forums)	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Support in securing school holiday care	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Insufficient resources/expertise
...Coaching for employees on returning to work from parental leave	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Parenting workshops targeting mothers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Insufficient resources/expertise
...Parenting workshops targeting fathers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Insufficient resources/expertise
...Other (provide details)	No

3: If your organisation would like to provide additional information relating to support for carers in your workplace, please do so below.

In January 2020, Santos implemented its revised Return to Work parents' programs. The changes included increasing paid parental primary and secondary carers leave, as well as providing 18 weeks paid leave for the primary carer who experiences the devastation of a still birth. Secondary carer leave for partner support would also apply. As at 31 December 2020, Santos has subsidised child-care places for children of 83 employees and has invested over \$450,000 through the Child Care Subsidy, with Santos paying 50% of the out-of-pocket childcare expenses for returning primary carers. Santos has continued to build on the Return to Work parents' programs with the addition of non-cash related

enhancements in 2020. Two focus groups were held across the organisation to better understand the needs of parents returning from primary parental leave and identify opportunities to further support parents in their return to the workplace. The 2020 additions to the program focus on upskilling supervisors to better engage employees on parental leave, as well as improving our on-site facilities for parents. The enhancements to the program include:

- Supervisor engagement schedule for parental leave aiming to support leaders to stay connected with their team members whilst on parental leave.
- Employee and Supervisor Parental Leave and Return to work kits, to educate leaders by providing critical information and check lists designed to drive a consistent return to work experience for all returning parents.
- Audit of parent rooms across the organisation to ensure adequate facilities are available and plans are put in place to address any gaps.

Between 2016 and 2019, Santos had 82% retention of primary carers after parental leave. We believe the above enhancements together with the continued support of the childcare subsidy and extended parental leave, will further improve the retention of returning parents. Our efforts this year were recognised through the South Australian Chamber of Mines and Energy (SACOME) award for the best Company Gender Diversity Program for our Working Parents Support Program. SACOME recognised the Santos Return to Work parents' program promotes both social and financial equality between men and women and forms part of the culture of equality, where family and carer responsibilities are accepted as equally male and female duties and where the financial impact of taking time off from work to start a family is minimised.

Sex-based harassment and discrimination

1: Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

Yes (*Select all that apply*)

...Yes

Policy

1.1: Do you provide a grievance process in any sex-based harassment and discrimination prevention formal policy and/or formal strategy?

Yes

2: Do you provide training on sex-based harassment and discrimination prevention to the following groups?

...All managers

Yes (*Please indicate how often is this training provided (select all that apply):*)

...Yes

At induction
Every one-to-two years

...All employees

Yes (*Please indicate how often is this training provided (select all that apply):*)

...Yes

At induction
Every one-to-two years

3: If your organisation would like to provide additional information relating to sex-based harassment and discrimination, please do so below.

Santos provides Code of Conduct training to all employees at induction and periodic refreshers, which includes sex-based harassment and discrimination prevention.

Family or domestic violence

1: Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

Yes (*Select all that apply*)

...Yes	Policy
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2: Other than a formal policy and/or formal strategy, do you have the following support mechanisms in place to support employees who are experiencing family or domestic violence?

...Employee assistance program (including access to psychologist, chaplain or counsellor)	Yes
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...Training of key personnel	Yes
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...A domestic violence clause is in an enterprise agreement or workplace agreement	No (<i>Select all that apply</i>)
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...No	Other (provide details)
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...Other (provide details)	Support may be provided on a discretionary basis
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...Workplace safety planning	Yes
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...Access to paid domestic violence leave (contained in an enterprise/workplace agreement)	No (<i>Select all that apply</i>)
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...No	Other (provide details)
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...Other (provide details)	Support may be provided on a discretionary basis
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...Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement)	No (<i>Select all that apply</i>)
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...No	Other (provide details)
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...Other (provide details)	Covered by Santos policy available to all employees
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...Access to paid domestic violence leave (not contained in an enterprise/workplace agreement)	No (<i>Select all that apply</i>)
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...No	Other (provide details)
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...Other (provide details)	Support may be provided on a discretionary basis
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...Access to unpaid leave	Yes
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...Confidentiality of matters disclosed	Yes
...Referral of employees to appropriate domestic violence support services for expert advice	Yes
...Protection from any adverse action or discrimination based on the disclosure of domestic violence	Yes
...Flexible working arrangements	Yes
...Provision of financial support (e.g. advance bonus payment or advanced pay)	Yes
...Offer change of office location	Yes
...Emergency accommodation assistance	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Support may be provided on a discretionary basis
...Access to medical services (e.g. doctor or nurse)	Yes
...Other (provide details)	No(<i>Select all that apply</i>)

3: If your organisation would like to provide additional information relating to family and domestic violence affecting your workplace, please do so below.