2025 TAX CONTRIBUTION AND TRANSPARENCY REPORT

Year ended 30 June 2025

MESSAGE FROM THE CHIEF FINANCIAL OFFICER

I am pleased to present the 2025 Tax Contribution and Transparency Report for Australia Pacific LNG Pty Limited (APLNG) detailing the taxes paid in the 2025 financial year. Our disclosure in this report aligns with the recommendations of the Board of Taxation's voluntary Tax Transparency Code.

While this report covers the financial year ended 30 June 2025, preliminary information for the 2026 financial year taxes paid has also been provided. The Tax Contribution and Transparency Report for the 2026 financial year will be released in due course.

From the 2025 financial year, APLNG became fully tax paying, having utilised all carry-forward tax losses from prior years, further enhancing our contribution to government revenues and the broader Australian economy.

Since the first LNG shipment in 2016 through to 30 June 2026, APLNG has paid 7.1 billion AUD in income tax, royalties, stamp duties and QLeave contributions. During the 2025 and 2026 financial years, APLNG paid a total of 1.9 billion AUD in 2025 and 1.8 billion AUD for 2026 in taxes and royalties.

Through the development and operation of our facilities we are proud of the significant economic value created for the communities where we operate and the broader Australian community. Our operations contribute to Australia's economic growth through local employment, the procurement of local goods and services, and ongoing infrastructure investments.

Gordon McGuire
Chief Financial Officer

WHO WE ARE

APLNG is an incorporated joint venture in which ConocoPhillips Australia Pacific LNG Pty Ltd 47.5% (ConocoPhillips), Origin Energy Limited 27.5% (Origin Energy), and Sinopec Australia Pacific LNG Pty Ltd 25% (SAPLNG) hold interests.

APLNG is one of the largest producers of natural gas in eastern Australia, supplying gas to the international LNG market and to the Australian east coast gas market. APLNG supplies gas directly to industrial customers in Queensland and sells to retailers that supply the domestic east coast gas market.

APLNG's activities include:

- ongoing operations, maintenance and further exploration and development of gas fields in the Surat and Bowen Basins in southwestern and central Queensland.
- operation and maintenance of the 530 km high pressure gas pipeline from the gas fields to the LNG facility on Curtis Island; and
- operation and maintenance of the LNG facility which has two trains with a combined design nameplate processing capacity of approximately 9.0 million tonnes per annum (Mtpa).

HOW WE REPORT

At APLNG, our corporate reporting is comprised of our Annual Report for the consolidated entity and three subsidiary companies of APLNG:

- Annual Report for Australia Pacific LNG Pty Limited
- Annual Report for Australia Pacific LNG Holdings Pty Limited
- Annual Report for Australia Pacific LNG Processing Pty Limited
- Annual Report for Australia Pacific LNG (Shared Facilities) Pty Limited

Our 2025 reports are lodged with ASIC.

This year is the eighth edition of our Tax Contribution Report and ninth edition of our Tax Transparency Report. The 2022 year was the first year that these reports were combined.

DISTRIBUTION OF ECONOMIC VALUE

The operation of APLNG's business benefits local, regional and national communities through:

- Procurement of goods and services from local suppliers;
- Creation of employment opportunities;
- Investment in community initiatives and local infrastructure;
- Wages to our employees and payments to contractors; and
- Payment of income tax, royalties, Qleave, stamp duties and rates to federal and state governments.

APLNG'S TAX POLICY AND RISK MANAGEMENT FRAMEWORK

APLNG complies with all applicable tax laws and regulations and seeks to mitigate tax risks associated with our activities consistent with the Australian Taxation Office's (ATO) Risk Management and Governance Review Guide.

The management of tax risk is an important component of APLNG's compliance approach managed via a risk management framework. The Board reviews the APLNG material risk profile, including changes to material risks and their ratings on a biannual basis.

The APLNG Board does not support activities which seek to aggressively structure the company's tax position. Tax effect accounting results, significant legislative change or court decisions affecting tax affairs and uncertain tax positions must be reported to the Board at a minimum during each half year reporting period. These matters are also included in monthly finance reports provided to APLNG Management and at each Board meeting.

APLNG's tax obligations are managed by Origin Energy in their capacity as corporate service provider to APLNG. In doing so, Origin Energy's approach focuses on the identification and assessment of tax risks, and tax related responsibilities and accountabilities across the business. Origin Energy's tax function reviews any new or non-recurring APLNG transactions above a determined threshold, any transaction that has a material non-financial impact, any transactions that impact the APLNG group's equity and any change in processes involving financial transactions.

For major transactions where tax implications will have a material financial impact on the company, APLNG seeks to obtain binding rulings from revenue authorities. If APLNG relies on public rulings, transactions must comply with the conditions of these rulings, so that APLNG is assured of the appropriate tax treatment. Where APLNG hold a joint venture interest, the company's representation on joint venture boards and operating committees help to align the joint venture entity with APLNG's position.

THE AUSTRALIAN TAX CONSOLIDATED GROUP

APLNG and its subsidiaries are all Australian tax residents and only have operations in Australia. APLNG lodges a single Australian tax return which consolidates the wholly owned subsidiaries.

APLNG changed its functional currency from Australian Dollars (AUD) to United States Dollars (USD) from 1 July 2016 as required under accounting standards. Also, with effect from the same date APLNG elected to change its functional currency from AUD to USD for income tax purposes.

As a result of the change in functional currency for accounting purposes, APLNG elected to present the APLNG group's financial statements in USD presentation currency from 1 July 2016. Although APLNG's presentation currency in its financial accounts is USD, the company is required to disclose amounts in Australian tax returns in AUD and has done so using the ATO's published average foreign exchange rate for the year ended 30 June 2025. This exchange rate is also used in the reconciliation of accounting profit to income tax expense (page 7) for the year ended 30 June 2025 and comparative figures for the prior income year.

APLNG'S ENGAGEMENT WITH THE AUSTRALIAN TAX OFFICE

As a company that has been classified by the ATO as a Top 100 public and multinational taxpayer, APLNG plays a prominent role in the Australian tax system. APLNG proactively engages with the ATO and state revenue authorities on a regular basis to maintain compliance.

Under the Action Differentiation Framework[1], the ATO's engagement is to partner with APLNG, meaning that the ATO has confidence in APLNG's tax compliance and ongoing commitment to maintaining an open and transparent relationship with the ATO.

The ATO has issued APLNG with an overall high level of assurance for income tax in respect of the 2018 to 2024

[1] The Action Differentiation Framework (ADF) is the ATO's strategic approach to engaging with public and multinational businesses. For further information on ADF, please refer to the ATO's website, https://www.ato.gov.au/Business/Large-business/Action-Differentiation-Framework/

financial years under its justified trust initiative. The ATO review for the 2025 financial year is currently in progress. The justified trust initiative involves a comprehensive review of a taxpayer by the ATO with objective evidence that would lead a reasonable person to conclude the taxpayer paid the right amount of tax. This is a higher level of assurance than confirming that certain risks do not arise.[2]

Tax Transparency Reporting

The ATO's report on tax entity information for the 2025 income year will include details of tax paid as compared to revenue. This report does not disclose what is invested to earn that income nor the expenses incurred to derive the revenue.

Although the ATO report has not yet been released, it is expected to include the following information with respect to APLNG for the financial year ended 30 June 2025:

- Total income in AUD 10,087,950,165;
- Taxable income in AUD 4,581,062,358; and
- Income tax payable in AUD 1,322,109,159.

APLNG's 2025 financial year accounting profit before income tax was 4,764,576,838 AUD and taxable income was 4,581,062,358 AUD. The reasons for the variance between these amounts are shown in Table 1 below, which primarily relate to:

- the timing in the depreciation of capital assets as generally tax depreciation is more concessional than accounting depreciation, providing higher deductions in the earlier years of an asset's life; and
- a foreign exchange (FX) loss deduction associated with project finance debt repayments.

Table 1: Income Tax Return's total income to income tax payable

	FY25 MILLION AUD
Total income	10,088
Less accounting expenses	(5,323)
Accounting profit before tax	4,765
Tax adjustments:	
Tax depreciation and other capital allowance deductions	(37)
Project Finance - FX loss deduction	(91)
Other adjustments	(56)
Taxable income	4,581
Gross tax payable at 30%	1,374
Franking deficit tax offset	(52)
Income tax payable	1,322

[2] For further information on justified trust, please refer to the ATO's website, http//www.ato.gov.au/business/large-business/justified-trust/

APLNG'S EFFECTIVE TAX RATE

The APLNG group's effective income tax rate for the 30 June 2025 tax year on the statutory accounting profit was 30 per cent. For the 30 June 2024 tax year, the effective tax rate was also 30 per cent.

TAXES PAID BY APLNG

Table 2 below provides an overview of the main taxes APLNG paid to the ATO and the Queensland Revenue Office.

Table 2: Taxes paid

	2026 MILLION AUD	2025 MILLION AUD	2024 MILLION AUD
Income tax	1,410	1,189	208
Government royalties	430	728	760
Total	1,840	1,917	968

The tax liability pertaining to a financial year is generally paid over two financial years, being a prepayment by way of tax instalments throughout the current financial year and beginning of the following financial year, and a balancing payment upon lodgement of the income tax return in the following financial year.

The income tax payments for 2025 in the table above are comprised of the following:

- tax payments of 344 million AUD in respect of the 2024 income year; and
- tax instalments of 845 million AUD in respect of the 2025 income year.

The income tax payments for 2026 in the table above are comprised of the following:

- tax payments of 529 million AUD in respect of the 2025 income year; and
- tax instalments of 880 million AUD in respect of the 2026 income year.

INTERNATIONAL - RELATED PARTY DEALINGS

All of the APLNG group's cross border related party dealings are conducted on an arm's length basis and are supported by contemporaneous documentation. These dealings can be classified into the following key categories:

THREE KEY CATEGORIES	
1	Sale of LNG to a subsidiary of the Chinese parent of SAPLNG, which transitioned from a Singapore subsidiary to a Hong Kong subsidiary during the year pursuant to a long-term LNG sales agreement;
2	Loans from China state owned commercial banks as part of a syndicated facility agreement including other unrelated lenders; and
3	Insurance obtained by the APLNG group from a US captive insurer which is a subsidiary company of the US parent of ConocoPhillips, and from a Singapore captive insurer which is a subsidiary of Origin Energy.

RECONCILIATION OF ACCOUNTING PROFIT TO TAX EXPENSE

This section provides details of the APLNG group accounting profit before tax to income tax expense.

RECONCILIATION OF ACCOUNTING PROFIT TO INCOME TAX EXPENSE

	2025 $MILLION AUD	2024[3] $MILLION AUD
Reconciliation between tax expense and pre-tax net (Loss)/Profit		
(Loss)/Profit from continuing operations before income tax	4,765	5,048
	4,765	**5,048**
Income tax using the domestic corporation tax rate of 30 per cent	**1,430**	**1,514**
Increase/(decrease) in income tax expense due to:		
Research and Development concession	-	3
Total non-temporary income tax expense adjustments	-	**3**
Total Income Tax Expense/(Benefit)	**1,430**	**1,517**
Accounting effective company tax rate (statutory profit)	30%	30%

[3] The figures disclosed for the year ended 30 June 2024 have been restated using the foreign exchange rate for the year ended 30 June 2025.

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SECRETARY

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AUDITOR for the relevant year

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