



Bengal
ENERGY LTD.

Modern Slavery Report

Fighting Against Forced Labour and Child Labour in Supply Chains
Act

For the Year Ended
March 31, 2024

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Report details

Entity	Bengal Energy Ltd. ("Bengal" or the "Company")
Business number	208250068
Reporting period	Year ended March 31, 2024
Categorization	Listed on a stock exchange in Canada
Sector/Industry	Oil and gas extraction
Location - head office	Calgary, Alberta, Canada
Location - operations	Queensland, Australia

Report approval

This report was approved by Bengal Energy Ltd.'s Board of Directors on May 31, 2024 pursuant to paragraph 11(4)(a) of the Modern Slavery Act and will be filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on the best my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Robert D. Steele

Chairman, having the authority to bind Bengal Energy Ltd. on behalf of Board of Directors,
May 31, 2024

Current year activities

“The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.”

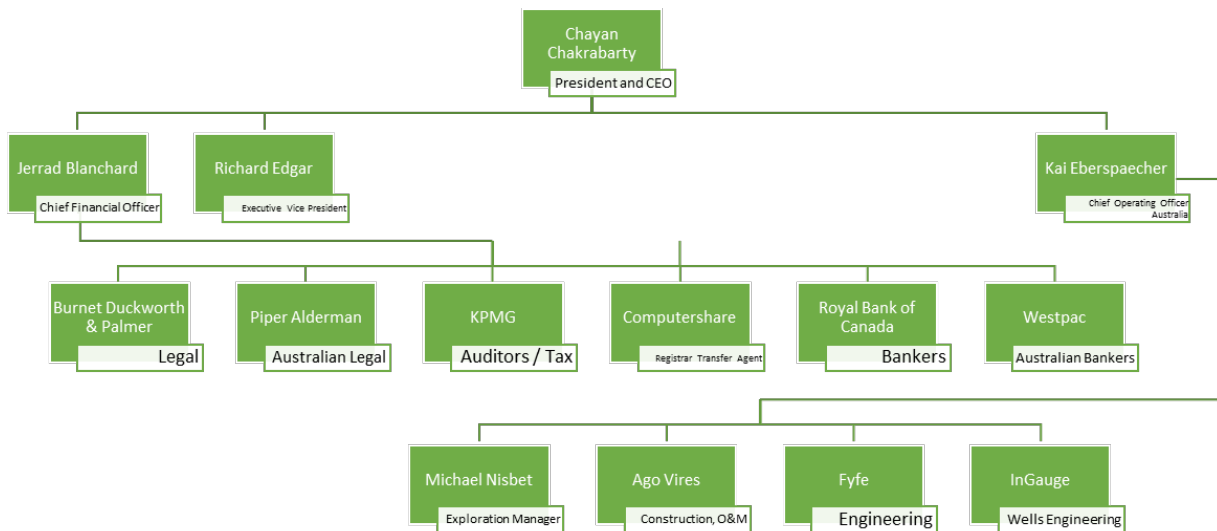
The Company has reviewed its procurement processes to evaluate its key suppliers and supply chain relationships. The Company has, where applicable, reviewed the publicly available information with respect to risk and risk-mitigation relating to forced and child labour.

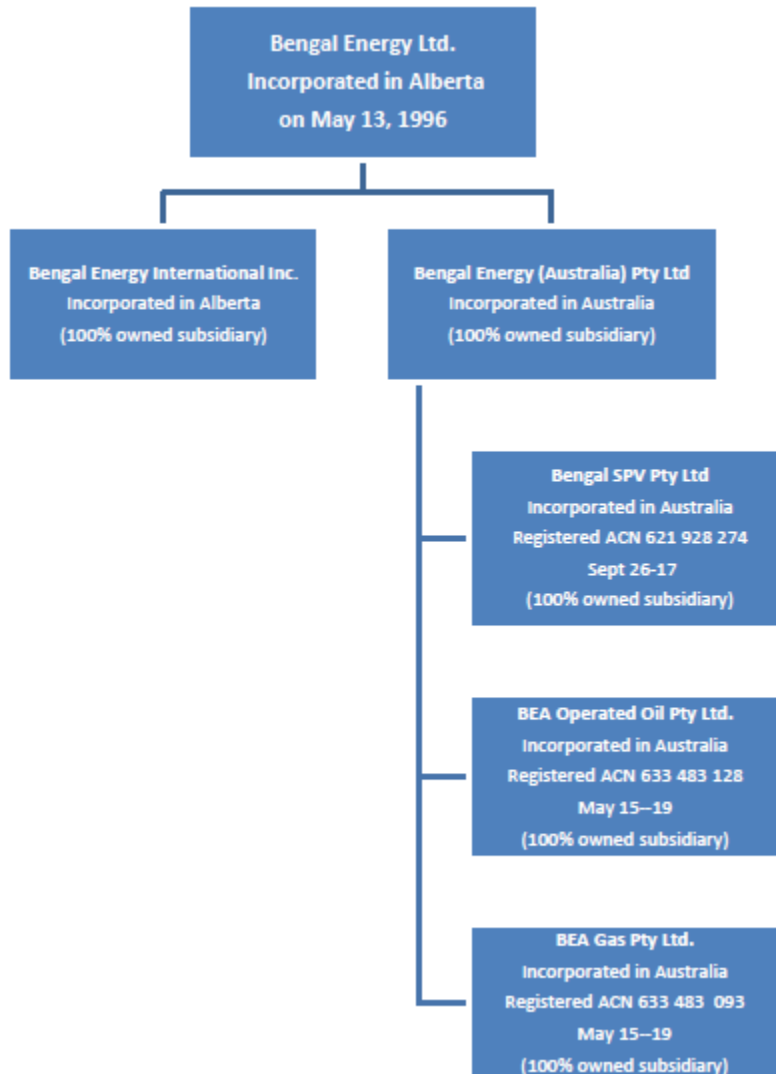
Structure, activities and supply chains

The Company's primary operations occur in Australia with head office operations in Canada. All disbursements in Canada relate to staffing costs and professional consultants directly supporting the Company, therefore risks associated with forced and child labour have only been assessed with respect to Australian operations. During the reporting period, the Company employed four (4) staff in Calgary Alberta Canada and two (2) staff in Brisbane Queensland Australia.

The company explores, develops, and produces crude oil and natural gas in Queensland Australia. All operating activities including sourcing of materials and labour is outsourced to either its Joint Venture operating parties or Australian vendors.

The Company relies on the supply chains of Santos Ltd., its primary Joint Venture (“JV”) Partner and its major vendors to manage supply chains.





Policies and due diligence processes

The company engages frequently with its JV partners (Santos) and frequently used vendors and considers risks of forced and child labour as part of its general risk management activities.

The Company has reviewed the publicly available disclosures from Santos Ltd. (“Santos”). Santos is subject to *Australia’s Modern Slavery Act 2018*.

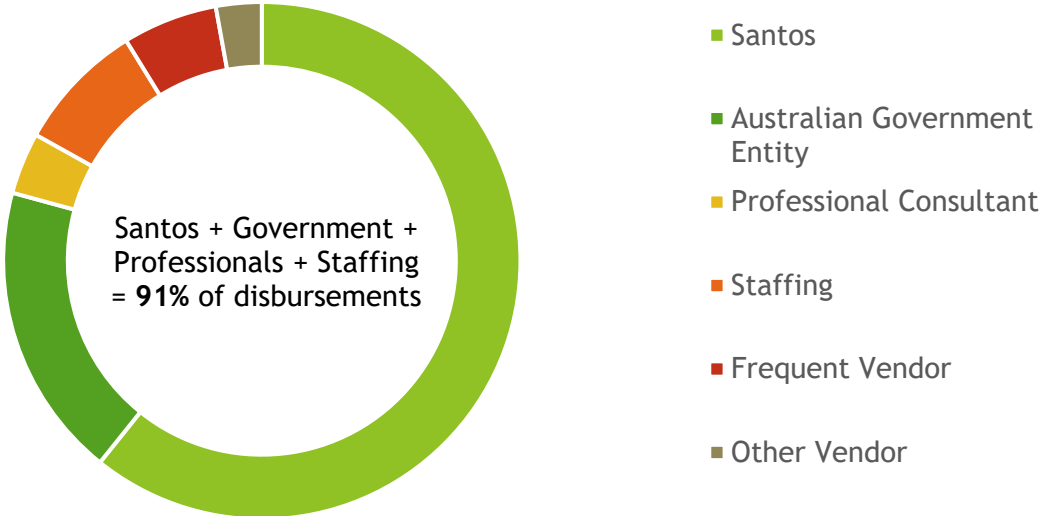
The Company has assessed the risks associated with forced and child labour from its recurring vendors through frequent discussions and collaboration.

Parts of business that carry risk

“The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.”

In Australia over 90% of disbursements are with very low risk counterparties as outlined below. Risk is mitigated through direct and frequent engagement with Santos and Major Vendors.

The Company considers the procurement of imported materials would carry the most significant risks associated with forced and child labour.



Measures taken to remediate

“Any measures taken to remediate any forced labour or child labour. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.”

No measures have been taken to remediate any forced or child labour given that no such instances or material risks have been identified. No measures have been taken to remediate the loss of income to the most vulnerable families given that no such instances or material risks have been identified.

Training

No specific training initiatives have been undertaken by the Company. Given the Company only employed 6 staff during the reporting period, frequent communication and collaboration was considered sufficient to educate all staff on the identification and mitigation strategies with respect to forced and child labour.

Assessing effectiveness

How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

The Company through its executives and board of directors considers risks associated with its supply chains regarding forced and child labour along with its general risk assessment on a quarterly basis. **The Company considers its risk assessment as effective for the reporting period.**