



Solargain PV Pty Ltd

Modern Slavery Statement  
Financial Year 2022/2023



## Introduction

Solargain PV Pty Ltd (ABN 90 132 725 501) submits this Modern Slavery Statement pursuant to the *Modern Slavery Act 2018 (Cth)* in respect of the financial year 1 July 2022 to 30 June 2023 (“FY23 Reporting Period”)

This statement covers the activities of Solargain PV Pty Ltd (ACN 132 725 501) and its wholly owned and controlled entity iStore (QLD) Pty Ltd (ACN 152 166 160), iStore (QLD) Pty Ltd currently has no trading activity or employees. The Director of the subsidiary is an executives and director of Solargain PV PL and was consulted in the preparation of this statement.

In this Modern Slavery Statement, Solargain PV Pty Ltd and its controlled entities are referred to as “**Solargain**”

As a leading renewable energy solutions company, specialising in the supply, installation and maintenance of solar hot water systems, solar energy and energy storage systems for residential and commercial customers, our dedication extends beyond environmental impact to encompass the advocacy and safeguarding of human rights. We value and promote high ethical standards within our business as well as from our suppliers and partners.

Solargain is committed to preventing modern slavery in all forms within our own operations and activities and throughout our supply chain. We encourage our suppliers hold their own supply chains to the same high standards.

Solargain is committed to raising awareness, identifying and addressing modern slavery risks within our operations and supply chains. We see this as a critical issue, and it is essential we play our role in enhancing the ethical of our business and our industry. By doing so, we contribute to the global initiative aimed at the elimination of Modern slavery.

## Structure and Operations

Solargain is a family-owned Australian Private Company first registered in August 2008, headquartered in Malaga, Western Australia with operations throughout Australia.

Solargain is one of the largest solar energy providers in Australia. Specialising in residential and commercial solar and energy storage installations as well as the wholesale supply to the renewable energy sector.

Our business covers the supply, installation and servicing of solar PV systems, energy storage systems and hot water systems, as well as the wholesale supply of solar products, including solar modules, inverters, batteries, mounting equipment, solar system components and hot water systems, and the trading of renewable energy certificates. Solargain incorporates the trading names SG Wholesale and Service My Solar, iStore and iStore Home. Currently there is no trading activity in the iStore (QLD) Pty Ltd entity.

In addition to our direct company operations, Solargain engages with several small businesses in regional locations throughout Australia who are contracted Authorised Solargain Distributors.

Solargain employees a diverse workforce across operational, trade, technical, sales, administration and professional roles. As at the 30<sup>th</sup> June 2023, Solargain had approximately 162 direct employees operating from 9 sites throughout Australia. Our employees are engaged under contracts that comply with the Fair Work Act and the National Employment Standards (NES) and where relevant, their employment terms align with and reference applicable awards.

### Supply Chain

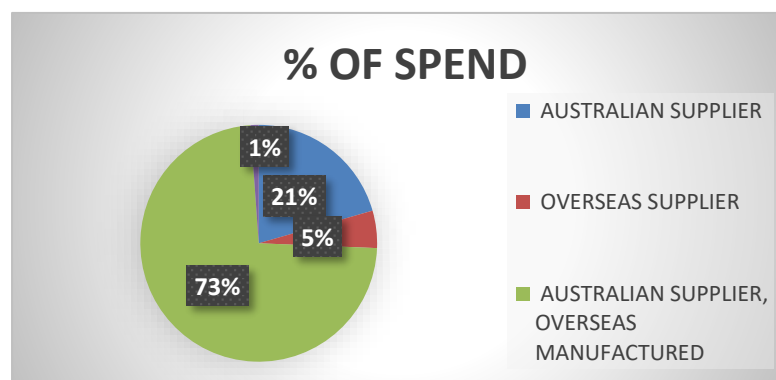
The products and services (including labour) that contribute to Solargain’s products and service offerings include suppliers within Australia and overseas. In FY23, 73 per cent of total expenditure was for products manufactured overseas, procured from suppliers with operational representation within Australia or through Australian distributors.

Our supplier relationships are predominantly established on a long-term arrangements, and primarily with entities located in Australia, with some located in the Philippines and China. The manufacturing of purchased products occurs in various countries including China, South Korea, Austria, Mexico, Indonesia, Malaysia, and Australia.

Our supply chain includes the following products and services:

- Support Services – accounting and finance services, administration, marketing, IT services, procurement and logistics and consultants – engineering, legal and recruitment. A majority, (over 99%) of these services are all locally and Australian sourced and provided services. We engage the services of a BPO based in the Philippines for some administration and finance functions.
- Construction Installation Services – residential and commercial Solar PV, energy storage and hot water systems installations and maintenance. Where these functions are not provided internally, they are all supplied by locally procured contractors.
- Product and Material Supply, including products that are manufactured overseas and supplied either direct from overseas manufacturers or via distributors located in Australia. Solargain does not manufacture any products itself.
- Ancillary services –cleaning contractors, premises maintenance contractors, uniform and clothing suppliers, all sourced from local suppliers.

Our material supply chain is represented as:



Solargain employs its own in-house installers (including electricians and plumbers). We also engage independent contractor installers and plumbers, all of whom are Australian small businesses.

### Modern Slavery Risk

Solargain recognises that modern slavery may impact our business activities and we are committed to reducing the risk that we might contribute to modern slavery through parts of our business operations and supply chains.

We expect our employees, contractors and suppliers to adhere to high ethical standards and comply with applicable laws, including those related to modern slavery and human trafficking.

The majority of Solargain's purchases are for solar PV and hot water systems and components, all of which are manufactured overseas. Due to the products, product raw materials and the manufacturers' geographical location, Solargain recognises these have a high potential of modern slavery risks.

In particular, materials used in the production of Solar modules, from China has been identified as a product whose production carries with it a high risk of modern slavery. Lack of visibility in overseas production markets, particularly in downstream material supplies adds additional modern slavery risks to the products used within our industry.

There is also some risk indirectly through the equipment used in corporate services (computers, laptops mobile phones and uniforms and safety equipment).

Within Solargain's Australian operations, the risk of modern slavery in the workforce is low. Apart from our direct employees, a large number of our suppliers are subcontractors who are small business operators with a majority of them working within their businesses. Solargain ensures that as a minimum are paid in line with the National Employment Standards and applicable Awards and contractors are paid commercial rates for their work.

Across 2022/2023, no specific modern slavery suspicions or concerns within our business or supply chains, have been brought to Solargain's attention, nor have we identified any specific modern slavery breaches, the risks are those areas identified above.

### Actions and Due Diligence to assess Modern Slavery Risk

Solargain is committed to ensuring there is transparency in our own business and in our approach to handling modern slavery throughout our supply chain. Having a direct purchasing relationship with a majority of the manufactures we use; we request the same high standards from all of our suppliers and other business partners.

We are committed to improving our procurement systems to have better oversight over our suppliers, in particular those suppliers in high-risk jurisdictions, or who supply products that are seen as higher risk. For suppliers that represent a higher risk, Solargain will be evaluating and developing more comprehensively supplier assessment.

### **Due Diligence**

Solargain has undertaken an initial internal risk assessment to identify any key modern slavery risks that exist within our operations and supply chains. Following the risk assessment, Solargain is either implementing or improving our process to address these risks.

Solargain undertakes an internal supplier assessment for all major suppliers as part of our due diligence, which is completed on an ongoing and regular basis. An assessment of modern slavery risk is incorporated into the supplier assessment, this includes a modern slavery questionnaire required to be completed by suppliers.

Any new supplier contractual arrangements includes appropriate contractual clause and terms relating to compliances with ethical standards around Modern Slavery and procedures to address modern slavery.

In the event that a risk is identified within our supply chain, or with a supplier, Solargain will work with the supplier to remedy the issue or risk, by applying corrective actions within a defined time frame, where this is not possible or not achieved, Solargain may terminate the supplier relationship.

Part of our due diligence process is to undertake site-visits and factory inspections of major suppliers. This is to meet with manufactures and inspect facilities to review quality, employee conditions and ethical practices. Across 2022/2023, management undertook inspections of 4 suppliers in China. This included factory inspections, meetings and discussions with employees.

The Australian solar market represents only minor percentage of the global solar market, and as such we lack leverage or influence over large international manufacturers. We are therefore reliant on the global renewable energy industry and governments to apply influence over the manufacturers and suppliers' policies and processes in relation to modern slavery within the renewal energy sector.

Indirectly however, Solargain through its larger business partnerships is working towards offering only those products where the manufacturers comply with modern slavery obligations. And welcome industry groups providing consistency to participants in reducing the risks of forced labour in the supply chain.

### **Awareness and Training:**

It is essential that internal training and development promotes awareness in relation to modern slavery risks.

To assist with the identification of modern slavery risks Solargain is committed to developing and providing ongoing modern slavery awareness and training to employees to provide them with the knowledge to identify modern slavery and equip them with what to do if they suspect any modern slavery. Particularly those who are involved in procurement and supply chain management.

### **Policies:**

Solargain has a Modern Slavery Policy as part of our continued effort to have in place effective systems and controls to identify modern slavery risks and ensure modern slavery is not taking place anywhere within our own business or our supply chain.

## Assessment and Effectiveness

Solargain remains committed to continuous improvement in our efforts to mitigate the risk of modern slavery.

To date, we have found no incident of modern slavery in our supply chain.

Senior management meet annually to consider and review:

- Whether our modern slavery risks are being appropriately identified and evaluated.
- The number of actions that have been implemented in relation to modern slavery.
- Supplier evaluations including modern slavery assessments and responses.
- Supplier factory visits, observations, and results of discussions in relation to modern slavery.
- Assessment of effectiveness and adherence of our policies and procedures, regarding modern slavery, procurement and HR.

During the 2024 reporting period, Solargain will focus on:

- Review of company policies and procedures to address modern slavery issues, and ensure these are implemented across the business, including developing and rolling out the Supplier Code of Conduct.
- Review and revise relevant contractual agreements – to ensure Modern Slavery clauses are both included and relevant.
- Continued development of online training platform – to include modern slavery and forced labour training for all employees, development of training material.
- Continued supplier assessment, and refining the assessment process due diligence process, development of an annual declaration statement for major suppliers and suppliers in higher modern slavery risk areas, to confirm compliance with Solargain's policies.

## Consultation

Solargain owns and controls iStore (QLD) Pty Ltd (ACN 152 166 160). iStore (QLD) Pty Ltd currently has no trading activity as at 30 June 2023. One of the directors of Solargain PV Pty Ltd is the sole director of iStore (QLD) Pty Ltd this enables any consultation between the entities to occur naturally whenever and wherever required.


iStore (QLD) Pty Ltd has no employees, the executives of Solargain PV Pty Ltd act and contribute to management of iStore (QLD) wherever required and policies, procedures and management systems operate across the two entities.

## Approval

This Statement was approved by the Board of Solargain PV Pty Ltd as the parent entity on 29<sup>th</sup> December 2023.



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Domenico Mercuri  
Director and Secretary



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Wayne Petridis  
Director