



POLICY STATEMENT

MODERN SLAVERY



Modern Slavery Statement

AEC Modern Slavery Statement for 2023/24

Our Business

All Energy Contracting (AEC) is an Australian-based company specialising in the construction of solar farms and underground cable installation for wind farms. We are proud to be a leading contributor to the renewable energy sector, providing our expertise to major contractors across Australia and New Zealand. Our dedicated workforce comprises skilled tradespeople, engineers, and project managers who are committed to delivering high-quality projects that meet the highest industry standards while prioritising environmental sustainability.

Our Structure, Operations, and Supply Chains

AEC operates as a privately held company, maintaining a lean and agile structure that enables us to respond effectively to the dynamic needs of the renewable energy market. Our operations encompass construction, commissioning, and ongoing maintenance. We leverage cutting-edge technology and innovative solutions to optimise efficiency and minimise environmental impact.

Our supply chains are diverse and intricate, involving a wide range of suppliers and minimal subcontractors across various sectors and geographic locations. We source materials, equipment, and services from both domestic and international markets, including steel, concrete, electrical components, cabling, and specialised tools. Our commitment to responsible sourcing drives us to partner with suppliers who share our values of ethical business practices and respect for human rights.

Our Commitment

AEC is unwavering in its commitment to upholding human rights and preventing modern slavery in all its manifestations. We recognise the potential for exploitation within the construction industry and are dedicated to mitigating these risks through proactive measures and continuous improvement. We believe in fostering a culture of respect, fairness, and inclusivity, ensuring that all individuals involved in our operations are treated with dignity and provided safe and equitable working conditions.

Modern Slavery Risks

We acknowledge the inherent risks of modern slavery within our operations and supply chains, and we are committed to addressing these risks head-on. The key areas of concern include:

- **Vulnerable workers:** Certain groups, such as migrant workers, temporary staff, and those working in low-skilled positions, may be more susceptible to exploitation due to factors like language barriers, limited awareness of their rights, and dependence on intermediaries.
- **Complex supply chains:** The intricate nature of our supply chains, with multiple tiers of suppliers and subcontractors, can obscure the origins of materials and services, making it difficult to identify and address potential instances of modern slavery.
- **High-risk sectors:** Some sectors within our supply chains, such as raw material extraction, manufacturing, and logistics, have been identified as high-risk for modern slavery due to factors like poor working conditions, low wages, and lack of transparency.



Our Actions to Assess and Address Risks

AEC has implemented a multi-faceted approach to assess and address modern slavery risks, encompassing the following key initiatives:

- **Risk Assessment:** We conduct thorough risk assessments that consider the specific vulnerabilities within our operations and supply chains, drawing upon industry expertise, external resources, and internal data. We regularly update these assessments to reflect evolving risks and emerging trends.
- **Due Diligence:** We have established a comprehensive due diligence process for our suppliers, including detailed questionnaires, independent audits, and on-site visits where necessary. We prioritise high-risk suppliers for more in-depth scrutiny.
- **Contractual Provisions:** We incorporate modern slavery clauses into our contracts with suppliers, mandating compliance with relevant laws and regulations, ethical labour practices, and transparent reporting. We also reserve the right to terminate contracts with suppliers who fail to meet our standards.
- **Whistleblower Protection:** We provide secure and confidential channels for whistleblowers, including employees, suppliers, and other stakeholders, to report potential modern slavery violations without fear of retaliation. All reports are promptly investigated, and appropriate actions are taken.
- **Training and Awareness:** We provide training to our employees, raising awareness of modern slavery risks and educating them on how to identify and report potential red flags. We also extend training and awareness initiatives to our suppliers and subcontractors where possible, fostering a shared commitment to ethical practices.
- **Collaboration:** We actively engage with industry peers, government agencies, and non-governmental organisations to share knowledge, best practices, and resources. We participate in collaborative initiatives aimed at combating modern slavery and promoting responsible business conduct.

Measuring Effectiveness

AEC are committed to measuring the effectiveness of our actions and continuously improving our approach to modern slavery prevention. We have a dedicated Modern Slavery Working Group who review our systems and policies as well as key performance indicators, such as:

- Number of supplier audits conducted
- Number of suppliers meeting our ethical sourcing requirements
- Number of reported incidents through our whistleblower hotline
- Feedback from employees, suppliers, and stakeholders

By monitoring these indicators and regularly reviewing our processes, we can identify areas for improvement and ensure that our efforts are making a tangible impact.



This Statement

This Modern Slavery Statement is made in accordance with section 16 of the *Modern Slavery Act 2018* (Cth) and constitutes our modern slavery statement for the financial year ending 30 June 2024. It has been approved by the Directors of All Energy Contracting in their capacity as principal governing body of All Energy Contracting Pty Ltd on 30 June 2024.

Luke Graham
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All Energy Contracting

Steve Urquhart
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