

# Risen Energy Modern Slavery Statement 2024

This modern slavery statement is made pursuant to sections 13 and 16 of the *Modern Slavery Act 2018* (Cth)

1 January 2023 to 31 December 2023

/// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



## Acknowledgement of Country

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*In the spirit of reconciliation we acknowledge the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters, and communities. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander cultures today.*

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## Statement from Management

Risen Energy (Australia) Pty Ltd (ABN 97 168 750 372) (**Risen Energy, we, our or us**) is one of the largest solar companies in Australia. We fund solar projects, we build them and we operate them. We are also an industry-leading solar module manufacturer. Our business is involved in all aspects of the solar industry, including manufacturing, sales, development, construction, and O&M. Accordingly, as leaders in the industry, we view it is incumbent upon ourselves to not only look after our own directly engaged team members, but also those who otherwise may be involved in, or impacted by, the solar industry more broadly. Risen Energy is also part of a broader global group of companies, and we act to ensure that all of our international businesses operate consistently in their ethical standards and commitments as contained in this policy.

As an environmentally sustainable business, Risen Energy always aims to act in the best interests of our stakeholders and beyond, including our team members, customers, the broader community, and the environment. This includes evolving to meet growing community expectations by maintaining best-practice consistent with the highest standards of corporate and social responsibility. We continue to strive to act with respect, care, and excellence in line with these standards, our own expectations and we encourage our stakeholders to do the same.

We recognise that modern slavery disproportionately affects:

- ▲ migrant workers or those on temporary visas;
- ▲ people seeking asylum or who have been internationally displaced;
- ▲ women, and people who identify as women;
- ▲ people from minority groups (including but not limited to ethnicity and nationality);
- ▲ people with disabilities;

/// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



- ▲ children and young people;
- ▲ people living or working in volatile regions, which have experienced protracted instability or conflict; and
- ▲ in particular, people with an intersection of the aforementioned features.

Risen Energy acknowledges that modern slavery occurs in every region, regardless of wealth and we do not tolerate modern slavery in any of our supply chains.

**Archie Chen | CEO**

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*Shiqi Chen*  
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**Irene Liu | Director**

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*Irene Liu*  
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## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



### Purpose

This statement, made pursuant to Australian *Modern Slavery Act 2018* (Cth) (**the Act**), sets out the actions taken by Risen Energy to address modern slavery and human trafficking risks in our business and supply chain over the reporting period of 1 January 2023 to 31 December 2023, addressing the mandatory reporting criteria imposed by the Act.

The purpose of this statement is to ensure Risen Energy's commitment to utilise ethical suppliers and ensuring that any modern slavery risks in Risen Energy's operations and supply chains are identified and that steps are taken to assess, address and minimise these risks and the occurrence of modern slavery.

Modern slavery captures situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom and includes the following categories of serious exploitation:

- ▲ trafficking in persons;
- ▲ slavery;
- ▲ servitude;
- ▲ forced marriage;
- ▲ forced labour;
- ▲ debt bondage;
- ▲ deceptive recruiting for labour or services; and
- ▲ the worst forms of child labour.

Risen Energy is committed to eradicating modern slavery, breaches of human rights, and wage theft in its operations, and to the extent that it is able, in its supply chains.

Since its introduction in Australia in 2018, and its first modern slavery statement in 2021 Risen Energy has wholeheartedly embraced the precepts enunciated in the Act and strives to continue to do so.

As our third statement, we have monitored progress against our "actions framework" from previous years. This statement describes our actions over the past year to strengthen our policies and performance in line with the requirements of the Act, as well as the ongoing strides we are making to enhance the detection of risks of modern slavery and human trafficking across our supply chain. We are devising strategies to mitigate against these risks over time, as well as crafting policies and procedures aimed at ameliorating those risks.



## Mandatory Criteria 1 and 2: Identity, Structure, Operations and Supply Chains

**Identity & Structure** The Risen Group is headquartered in Ningbo, China with key hubs in Hong Kong, Singapore and Australia. The parent company Risen Energy Co., Ltd is listed on the Shenzhen Stock Exchange (SZSE).

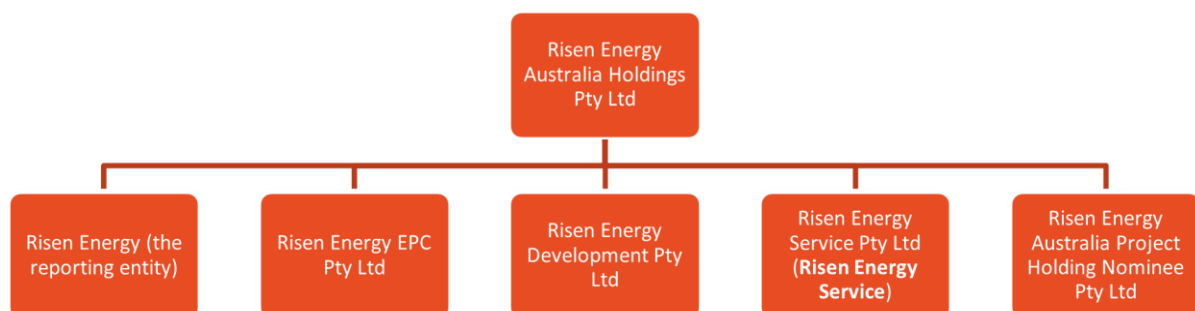
This is a joint statement that covers the Risen Energy entities in Australia depicted in the diagram below. In Australia, all these entities are ultimately owned by a common parent company, being Risen Energy Australia Holdings Pty Ltd. The scope of work for all subsidiaries of Risen Energy Australia Holdings Pty Ltd includes solar manufacturing, sales, development, construction, and O&M.

This statement also covers the reporting entity Risen Energy which has no subsidiaries. Risen Energy is part of a larger corporate body (**The Risen Group**) including several entities in Australia (as follows). A diagram setting out the Australian corporate structure is on the following pages.

Risen Energy's registered office is located at Level 11, 307 Queen Street, Brisbane in the State of Queensland, 4000.

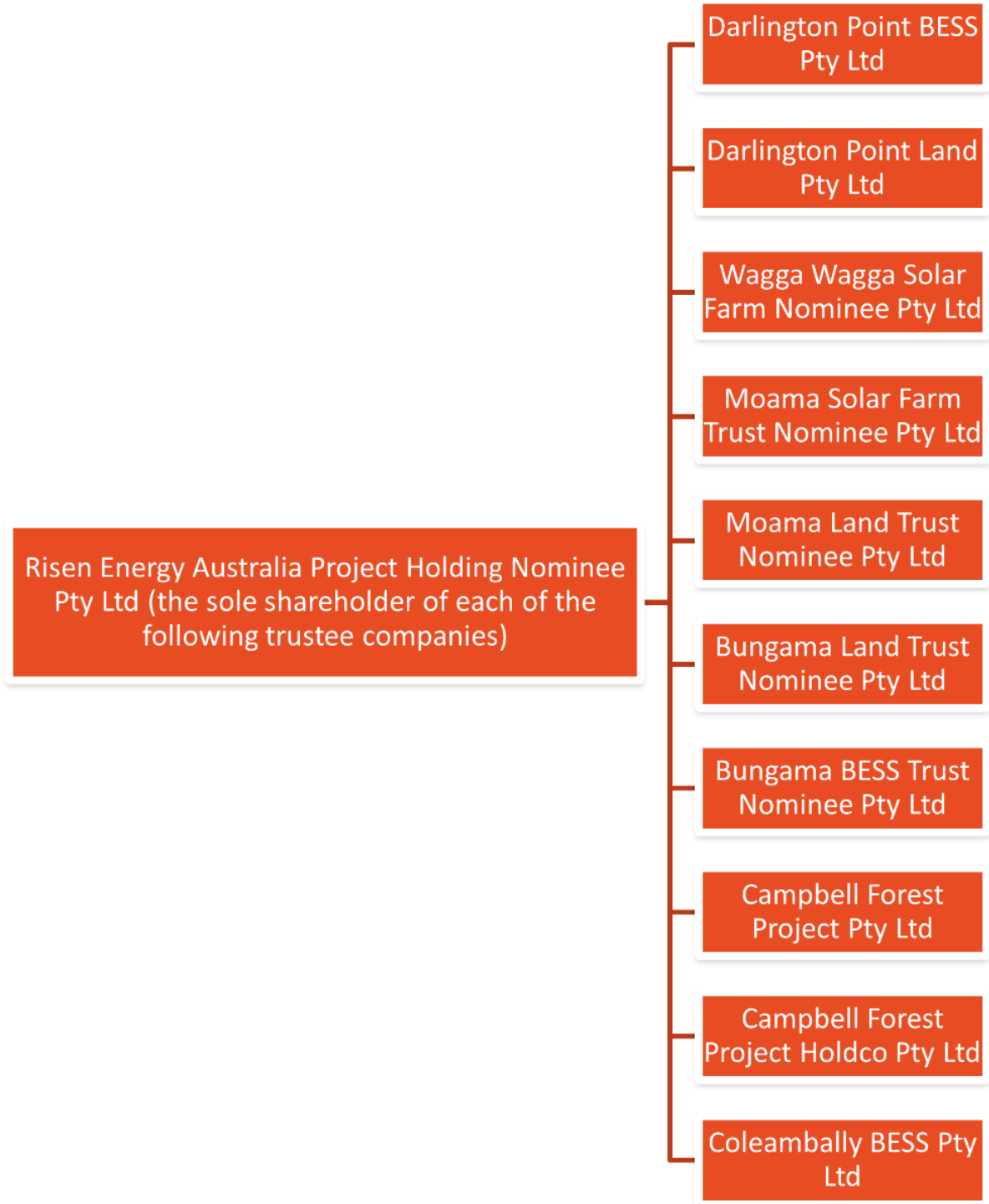
The Risen Group has over 15,633 full time employees globally and is present in over 14 countries including China, Kazakhstan, Germany, Italy, Spain, India, Bangladesh, Cambodia, Vietnam, South Korea, Japan, Malaysia, Australia, The United States, and Brazil.

In this reporting period, Risen Energy had a workforce of 24 full-time (or full-time equivalent) employees. Risen Energy does not currently engage any casual or independent contractor staff. From time-to-time Risen Energy engages temporary workers. Risen Energy currently has two staff members working in an arrangement whom it sponsors to facilitate their visa arrangements



/// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



### Risen Energy's Operations

Risen Energy develops solar farms, constructs solar farms, invests in solar farms, provides solar panels to wholesalers and constructors of utility solar farms, operates and maintains solar farms, and owns solar farms which sell green energy through wholesale power purchase agreements. Our business includes manufacturing, sales, development, construction and operation, and maintenance – meaning our operations span the full breadth of this industry.

### Risen Energy's Supply Chains

Risen Energy's core business involves the sale and supply of solar modules. Our supply chain consists of corporate services, warehouse, transport, and logistic services, electricity equipment and supplies including solar panels. The main product distributed by Risen Energy in 2023 was Photovoltaic (PV) modules which are manufactured by our parent company in China – these are the devices that convert sunlight into electrical energy. The production of PV modules includes the following products: cells, wafers, ingots, polysilicon, metallurgical

silicon, and quartzite. We source these products from a range of suppliers including other entities in The Risen Group. Our suppliers are based in China (mainly Inner Mongolia, Zhejiang, Jiangsu, Sichuan and Yunnan provincial areas) and Germany.

Aside from these key “off-the-shelf” products for our solar panels and inverters, the majority of goods and services in our supply chain are sourced from Australian suppliers. We procure a range of other goods and services to enable our businesses to function including consumable items such as tea, coffee and catering, stationery, postage and furniture, information and technology goods and services, financial and legal services, telecommunication services, cleaning services, utilities, professional consultancy services, marketing services, recruitment agencies and travel services and products.

Risen Energy Service's core business is the operation and asset management of solar farms. Risen Energy Service's supply chains consist of field and maintenance services, corporate services, and consulting services.

/// Risen Energy Modern Slavery Statement 2024



1 January 2023 to 31 December 2023

## Map of supply chain

- Alxa League, Inner Mongolia, China
- Baoshan, Yunnan, China
- Baotou City, Inner Mongolia, China
- Bayannur, Inner Mongolia, China
- Changzhou, Jiangsu, China
- Chuzhou, Anhui, China
- Gansu, China
- Germany
- Gucheng, Hubei, China
- Hohhot, Inner Mongolia, China
- Leshan, Shizhong District, China
- Ngawa, Ngawa County, China
- Ningbo, Zhejiang, China
- Quzhou, Zhejiang, China
- Tianjin, China
- Xuzhou, Jiangsu, China
- Yiwu, Zhejiang, China
- Yunnan, China
- Zhaotong City, Yunnan, China



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## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



## Mandatory Criteria 3: Risks of Modern Slavery

Risen Energy is aware that due to the nature and prevalence of modern slavery, every Risen Energy entity has risks of modern slavery in its operations or supply chains. Here, we identify our potentially higher risk areas.

### Risks in Risen Energy's Operations

We understand that renewable energy industries are considered high-risk industries in relation to modern slavery, particularly where *'the expansion of renewable energy is playing, and will continue to play for many decades to come, an essential role in the collective response to climate change'*.<sup>1</sup> We do not shy away from this reality and rather we acknowledge that, in addition to *'technology-specific risks, renewable energy companies need to manage the exposure to modern slavery that is shared by almost all organisations in their general procurement, operations, logistics and investments'*.<sup>2</sup>

In relation to our own employees, direct employees in Australia are engaged by written contracts, which are subject to legislated minimum standards, including the National Employment Standards and modern awards. Our employees are free to associate with their respective union. Risen Energy also offers its employees independent financial consulting. As above, we only have a very small number of employees working in arrangements where Risen Energy has sponsored their visa, and so it is straightforward for us to monitor the rights and working conditions of those two staff members.

We of course acknowledge that any company utilising recruitment agencies to hire staff may be exposed to some increased risks of modern slavery as these practices can, in some cases, reduce the oversight a company has over the hiring process and employment conditions.

Accordingly, where we have the occasion to utilise temporary workers, we closely monitor this aspect of our operations, including committing to only engage reputable labour hire companies and recruitment agencies.

### Risks in Risen Energy's Supply Chains

We know that businesses can inadvertently contribute to, or be indirectly linked with, modern slavery practices in their own supply chains by conducting operations in a way that may facilitate or incentivise modern slavery, or simply by contracting with a supplier that engages in modern slavery practices.

Since our last Modern Slavery Statement in 2022 Risen Energy is not aware of any actual instances of modern slavery occurring in its operations or supply chains, but we understand that does not mean there is no risk. We have described our supply chains as set out above. The areas of our supply chains that we consider to be higher risk based on the literature and expert research include suppliers of solar panels and solar panel inputs overseas such as solar cells and wafers, polysilicon and quartzite. We also consider some local suppliers may pose a higher risk such as suppliers of coffee and tea, cleaning, stationery and furniture.

We note that Germany and Australia are ranked by the global slavery index as having a low prevalence of modern slavery. Whilst China has a higher prevalence of modern slavery, as detailed above a significant proportion of our dealings in these countries are either through our own entities or through entities that we have

<sup>1</sup> Clean Energy Council:  
<https://assets.cleanenergycouncil.org.au/documents/resouces/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf>

<sup>2</sup> Clean Energy Council:  
<https://assets.cleanenergycouncil.org.au/documents/resouces/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf>

### /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



invested in ourselves and as such enables us to maintain a greater degree of control and oversight over the goods and services that are procured from these geographic locations.

Risen Energy acknowledges that our supply chains extend beyond those with whom we have direct contractual relationships. Since our last Modern Slavery Statement in 2022, we have commenced interrogation, and reviewing of, our second and third tier suppliers of products such as solar cell and wafer suppliers. In January 2024, Risen Energy's headquarters in China established a department to track and assess the compliance of Risen Energy's global suppliers with mitigating modern slavery risks. This includes the establishment of a Code of Conduct for Risen Energy's suppliers to sign

and comply with. As at the date of this statement, 100% of Risen Energy's suppliers have signed up to our Code of Conduct.

Further, as part of its ESG, Risen Energy's parent company in China has developed a live tracking, management, reporting and auditing mechanism to assess our supplier's compliance with Risen Energy's internal policies in real time. The tracking, management and reporting system includes details such as whether a supplier has purchased material to ensure compliance and consistency in our supply chains. We elaborate on this live tracking mechanism further below on pages 12 to 14.

### /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



## Mandatory Criteria 4: Actions to Assess and Address Risks

Risen Energy is committed to making every effort to assess and address the risks identified above. We have adopted a continuous improvement approach.

This includes enhancing oversight over Risen Energy's sourcing of key materials. One such example is our decision to largely acquire solar panels from our parent company, and in the previous reporting period having invested in two polysilicon facilities based in Inner Mongolia.

To this end, Risen Energy has always embraced a localised procurement strategy to reduce reliance on external raw materials and transportation costs, thereby enhancing the stability and traceability of our supply chain. In the last reporting period, the Risen Energy Group has achieved a 36% localisation rate for main materials and 50% for auxiliary materials. This approach not only optimises our cost structure but also strengthens our ability to address and mitigate potential supply chain risks. Risen Energy will continue to deepen our localised procurement policy, viewing the localisation of the supply chain as a key aspect of the Group's strategic goals for sound and sustainable development.

Risen Energy is also heartened by the growing awareness in Australia and notes the development of many solar farms are now being made conditional on certification that the manufacture of the panels meets defined anti-slavery standards. Around the world, international investors are increasingly tying their investment in renewable energy projects to similar human rights obligations. Risen Energy has engaged external experts to closely follow the NSW Anti-Slavery Commissioner's proposal of a Renewable Energy Code of Practice so that we can ensure steps we take

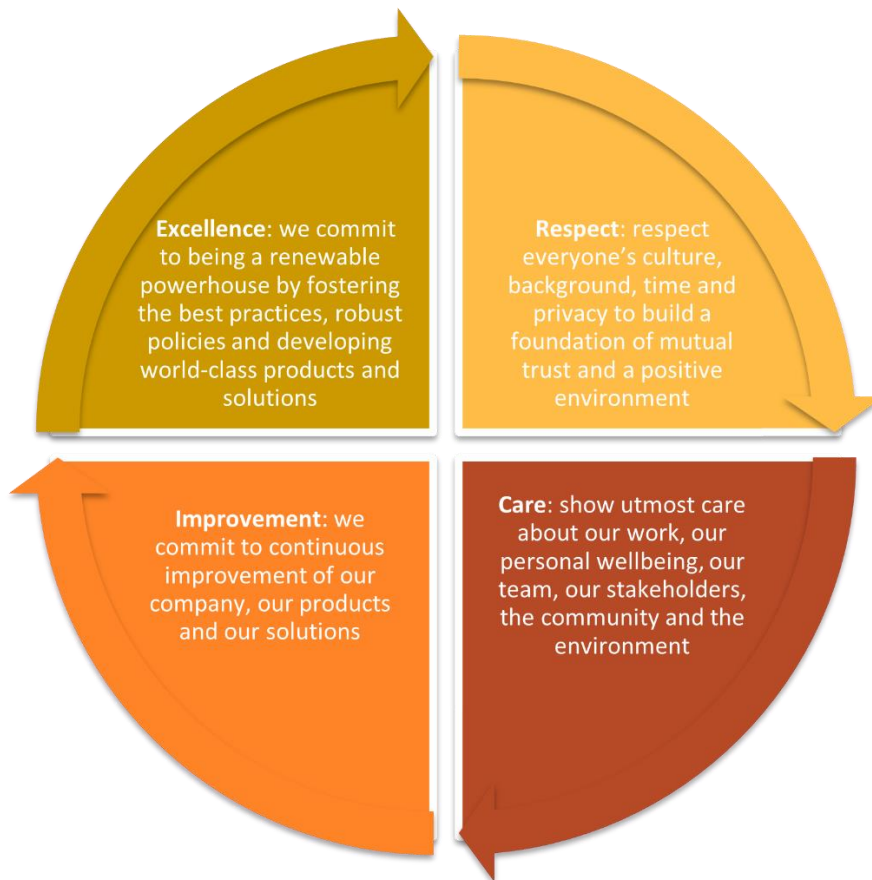
in our modern slavery approach are consistent with best practice industry standards that are being discussed in those forums. Since our last Modern Slavery Statement in 2022, the NSW Anti-Slavery Commissioner released a discussion paper in August 2023 in relation to the proposed Renewable Energy Code of Practice. While it indicated that the release of the Renewables Code of Practice was expected in March 2024, this has not yet occurred. Risen Energy will closely monitor any developments in this area.

### Our values

These values underpin our culture at Risen Energy, fostering a robust approach to identifying, assessing and addressing modern slavery risks. The renewable energy industry is one focused on sustainability and taking care of the world. Whilst we are aware of the high risks within our industry we believe the very values inherent to the industry and Risen Energy are aligned with protecting human rights.

## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



## Policies and Procedures &amp; Training – Risen Energy personnel

We understand that staff play a key role in our due diligence process. We have a range of policies applicable to all staff that further our approach to modern slavery directly but that also ensure our workplace generally aligns with legal and ethical workplace requirements including our:

- ▲ Modern Slavery Policy;
- ▲ Anti-bribery Policy;
- ▲ Whistleblower Protection Policy;
- ▲ Grievance Policy;
- ▲ Anti-discrimination, bullying and harassment Policy; and
- ▲ Code of Business Conduct and Ethics.

Since our last modern slavery statement, we undertook a wholesale review of these policies, which were updated in 2024. 100% of Risen Energy's employees have read and

acknowledged they understand and will comply with these updated policies. In addition to the training undertaken by employees as part of their mandatory induction process, all employees in Australia in the last reporting period have also conducted a mandatory three-hour refresher training session in relation to modern slavery.

Our Modern Slavery Policy refers to the UN Global Compact and Ethical Trading Initiative Base Code as underpinning our procurement policies. It generally provides our commitments to our own workforce as well as to identifying, assessing, and addressing risks in our supply chain.

Our Code of Business Conduct and Ethics speaks to compliance with laws, improper personal gains/benefits, conflicts of interest,

## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



insider trading, competition and fair dealing, confidentiality, gifts/donations, record-keeping, proper use of assets, discrimination and harassment, environment, health and safety, money laundering, and suspicious activities. It also explicitly prohibits any form of forced and child labour and provides avenues through which employees can report any illegal or unethical behaviour. All employees have to sign off on a certificate of compliance with the Code of Business Conduct and Ethics.

We understand that the nature of modern slavery is that victims and witnesses are often powerless to come forward. Our Whistleblower Protection Policy is a key component of our approach to modern slavery in that it provides a safe and anonymous reporting avenue free of retribution. We have updated both our Whistleblower Protection Policy and Grievance Policy to include human rights-related

### Suppliers

We continue to communicate Risen Energy's approach to assessing and addressing the risk of modern slavery in its supply chain. We consider this can best be achieved through cooperation with our suppliers and clients to optimise their own approaches to their supply chains. Accordingly, in the last reporting period, we have focused on conducting a review process of our critical suppliers and obtaining information from those suppliers relevant to identifying potential modern slavery risks.

We have established a supplier code of conduct which clearly sets out to our suppliers Risen Energy's expectations regarding modern slavery, human rights, labour practices, environmental responsibility, consumer safety, ethical conduct and data and privacy. We advise suppliers that failure to comply may prompt us to reassess our relationship with the supplier. It is also a mechanism through which we can request relevant information regarding compliance and monitor this on an ongoing basis.

complaints. There have been no complaints or reports pursuant to our Whistleblower Protection Policy or our Grievance Policy relating to the occurrence of modern slavery in the last reporting period.

We have also created a Frequently Asked Question/Template Response document for our staff which spans 14 questions and which we hope will increase awareness as to our approach to modern slavery and Risen Energy's commitment to eradicate it.

We are eager to continue providing recognition for individual staff members who go above and beyond expectations in advocating for robust ethical sourcing, as a means of incentivising our team to continue innovating in this space.

As outlined above, Risen Energy is taking steps in respect of our supplier management practices. Risen Energy is dedicated to advancing supplier sustainability by integrating environmental and social factors into the supplier assessment process. This approach aims to proactively prevent and mitigate supply chain risks. Tier 1 suppliers are required to sign agreements related to ESG and human rights. Additionally, Risen Energy encourages Tier 2 suppliers of key strategic partners to also sign these agreements.

To ensure suppliers meet our ESG standards and mitigate potential risks associated with the supply chain, Risen Energy implements a rigorous ESG audit program. This program screens suppliers based on their industry, business scale, and potential risk level. Annually, we conduct on-site and / or online audits covering potential social and environmental risks, ensuring full compliance with stringent guidelines throughout the process. During the audit process, we use a combination of questionnaires and evidence-based documentation to comprehensively

## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



assess the supplier's ESG practices. The assessment results are then scored based on five categories of criteria, with suppliers required to achieve a minimum of 80 points in the ESG audit. Should a supplier fail to meet this standard, they will receive a warning and consultation and support will be offered. If, after one to six months of consultation and support, a supplier still does not meet our standards, the business relationship will be terminated.

In 2023, we conducted ESG due diligence on 68 suppliers, comprising 66 on-site audits and two online audits. Following the Corrective Action Plan, all suppliers successfully passed the ESG final audit.

Key Performance Index	2021	2022	2023	Unit
On-site audit	44	34	98	times
Number of suppliers that conduct due diligence	33	33	68	no.
Number of suppliers with terminated cooperation	3	2	6	no.
Suppliers confirmed as having actual and potentially significant ESG impacts	0	0	0	no.
Number of new suppliers selected by ESG Standards	100	100	100	%

We have also created modern slavery clauses and covenants for supply contract templates in our Australian operations, requiring suppliers to:

- ▲ comply with the Act;
- ▲ implement appropriate controls;
- ▲ notify Risen Energy immediately if they become aware of any occurrence of modern slavery within their own supply chains.

In our last modern slavery statement, we were in the process of conducting reviews and updating all of our contract templates to ensure they include these clauses. Since the last reporting period, all template contracts between Risen Energy and its suppliers, including its terms and conditions, master consultant agreements and master service supply

agreements, have now been updated to include these clauses.

We have established a practical and comprehensive supply chain tracking mechanism to ensure strict compliance with the laws and regulations of host countries. This traceable supply chain is established through the mechanisms set out on the next page.

In 2022, we also worked to map the part of our supply chain that relates to PV modules, given the suppliers of polysilicon have been identified as an area in which we need to ensure maximum possible oversight. As outlined above, we have interrogated and reviewed second and third tier suppliers, such as those providing solar cell and wafers. We have focused specifically on:



/// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



- ▲ suppliers' policies and procedures around worker labour and payroll conditions;
- ▲ factory audits of workplace practices; and
- ▲ processes for developing cooperative solutions that meet international human rights standards.

We have developed a modern slavery self-assessment template, which enables us to undertake a risk assessment of our suppliers through a questionnaire and review form. This tool was developed using resources from the Global Slavery Index, Global Compact Network, TRACE International, the Transparency International Corruption Perceptions Index and the Australian Modern Slavery register. It contains over 20 questions that enable us to better understand the risks posed by each of our suppliers. This has been sent to all of our suppliers.

We have a vendor assurance program wherein all new and existing vendors will be subjected to due diligence processes that include answering a brief pre-qualifications

questionnaire (**PQQ**) on an annual basis. The PQQ enables us to identify potential areas of risk and to assess the business mechanisms and policies for managing modern slavery risks. In the last reporting period, no areas of risk were identified. We have sent the PQQ to the majority of high risk suppliers identified with Risen Energy's initial risk mapping exercise as detailed above, and with the assistance of the live tracking system, continually review the responses received.

Another step that we are proud of is that we have introduced social audits through the Initiative for Compliance and Sustainability (**ISC**) for our overseas production operations. These audits are then provided to our Australian entities each year confirming compliance by our overseas entities. At the end of 2023 a survey was conducted of the Risen Yiwu factory in the Zhejiang Province which generated an overall rating of 93 out of 100



## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



### Mandatory Criteria 5: Assessing the Effectiveness of our Actions

Risen Energy is aware that Modern Slavery risks are fluid and can change over time both as we obtain greater visibility and knowledge of our supply chains and also as the world and the occurrence of modern slavery alters and shifts. We know we need to adapt and be in a position to pivot in order to continue effectively ameliorating these risks.

We continue to hold meetings to finalise membership of a modern slavery working group in Australia. This working group will coordinate our modern slavery approach going forward including consulting with internal stakeholders (such as human resources and procurement) to help develop and track the deliverables that have been targeted for completion.

Risen Energy continues to seek written feedback from employees in procurement, human resources, legal, commercial, sustainability, environmental and governance teams in the Risen Group as to our modern slavery approach which is being evaluated and will be incorporated into policies and procedures going forward. We also continue to carry out an annual self-assessment program to check our policies and processes are being adhered to and improved, with the most recent self-assessment taking place at the end of 2023.

We also measure and track the following:

- ▲ competence evaluations of staff following modern slavery training sessions;
- ▲ tracking suppliers that have agreed to undertake modern slavery improvements following our risk assessment (as outlined above, it is now a contractual obligation on all our suppliers to adhere to);
- ▲ annual reviews of key supplier responses to the PQQ;
- ▲ annual risk assessment of key suppliers in Chinese regions;
- ▲ implementation of relevant international human rights and modern slavery benchmarks, including monitoring of the Renewable Energy Code of Practice;
- ▲ assessments of feedback received through training sessions. As at the time of this report, there is currently no outstanding feedback; and
- ▲ regular reviews with suppliers (including the measures set out above to monitor and track our supply chains).

We believe that accountability for assessing and addressing modern slavery risks is held by all business units, but key responsibility for developing and monitoring compliance with our policies sits with our Chief Financial Officer, Chief Executive Officer, Chief Operations Officer and Group General Counsel. All of these accountabilities ultimately then rest with our Board, as the overall governance body.



### /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



We are also seeking feedback from our suppliers as to innovations and processes utilised by them which we might all adopt as a 'best practice' to combat modern slavery.

#### **Mandatory Criteria 6: Consultation**

Risen Energy and Risen Energy Service share the same board of directors. As such, decisions around governance and operations including our approach to modern slavery occur in a centralised way and consultation on this issue is therefore a natural part of the way we do business. The board of each entity in the Risen Group meets at least four times per year to review (amongst other matters):

- ▲ key risks for that entity (including modern slavery related risks);
- ▲ payment of entitlements to all employees; and
- ▲ procurement events which can include more intense audits of a random selection of procurement vendors to confirm the assigned risk levels.

Employees within various departments including procurement, human resources, legal and compliance have been involved in this process. This has ensured that relevant departments and management are aware of what actions they need to take to further our modern slavery approach

## /// Risen Energy Modern Slavery Statement 2024

1 January 2023 to 31 December 2023



### From our Governing Body

Risen Energy makes this statement in accordance with sections 13 and 16 of the Act. Our Board is our principal governing body, and this statement has been considered and approved of by the Board.

Director and Company Secretary and Responsible Members of Risen Energy's Principal Governing Pricing:

**Archie Chen, Chief Executive Officer**

**Irene Liu, Director**

### Disclaimer

*This report contains forward-looking statements, including statements of current intention, statements of opinion or predictions or expectations as to possible future events. These statements are not statements of fact, and there can be no certainty of outcome in relation to the matters to which the statements relate.*

*Forward looking statements involve known and unknown risks, uncertainties, assumptions, and other important factors that could cause the actual outcomes to be materially different from the events or results expressed or implied by such statements, and the outcomes are not all within the control of Risen Energy's Australia entities. Statements about past performance are also not necessarily indicative of future performance.*