

# **Modern Slavery Statement 2021**

# 1. About Contact

Contact Energy Limited ("Contact") is a New Zealand registered company, and a leading energy generator and digital retailer, engaged in providing electricity, broadband, natural gas and liquefied petroleum gas ("LPG").

We have prepared this Modern Slavery Statement ("Statement") in line with the requirements of the Australian Modern Slavery Act 2018 (Cth). It explains how we put our energy where it matters and the steps we have taken to identify, manage and mitigate the specific risks of Modern Slavery in our operations and supply chain for the twelve months ending 30 June 2020 ("FY20").

This Statement is made jointly on behalf of Contact and its wholly owned subsidiary, Simply Energy Limited ("Simply").

We expect all our people to act honestly, with integrity, in Contact's best interests and in accordance with the law, all the time. This expectation is enshrined in our Code of Conduct, which underpins our corporate policy framework. We set new corporate policies to address key risks and set expected standards of behaviour for our people.

For more information about Contact, our 2020 Integrated Report can be found here.

# 2. Contact's Structure, Operations, and Supply Chain

We generate electricity from hydro, geothermal and thermal fuel sources.

We have two operating segments, Wholesale and Customer. The Wholesale segment is engaged in the business of generating and selling electricity to the wholesale electricity market, commercial and industrial customers, and to the Customer segment. The Customer segment sells electricity, natural gas, LPG, and broadband to mass market customers.

Contact operates the following power stations: Stratford in Taranaki, Te Rapa, Te Huka, Ohaaki, Poihipi, Wairakei and Te Mihi in Waikato, Whirinaki in Hawke's Bay, and Clyde and Roxburgh in Central Otago.

For more information about Contact's structure, operations, and supply chain our 2020 Integrated Report can be found <u>here</u>.

# 3. Consultation with Subsidiaries

Contact will meet with Simply representatives during FY21 to raise awareness, frame Contact's expectations, and understand Simply's approach to mitigate Modern Slavery risks.

Contact provided Simply with documentation outlining these expectations and provided appropriate guidance towards official resources.

## 4. Risks of Modern Slavery

Modern Slavery refers to enslavement of vulnerable people whose freedom is impacted by exploitation including threats, violence and coercion, abuse of power or deception.

We regularly review the related risks to prioritise our efforts in our own operations and supply chain.

#### Risks of Modern Slavery on our people and contracted/third-party labour providers

Most of Contact's people are employed directly (or are direct contracted) and are based in New Zealand. This lowers Modern Slavery risks within our business. Our operational risk assessment focusses on areas that use contracted or third-party labour providers as we have less direct visibility and control over these workers and their employment terms.

#### Risks of Modern Slavery in our operations and supply chain

Given that Contact's businesses rely on global networks we seek to identify and where we can, take action to rectify risks in global supply chain where regulation may be weak.

Contact manages Modern Slavery risks in our operations and supply chain by:

- 1) Assessing Modern Slavery risk factors in our operations and supply chain;
- 2) Prioritising focus areas within our operations and supply chain for further due diligence;
- 3) Addressing the risks of Modern Slavery practices; and
- 4) Reviewing the effectiveness of our actions.

## 5. Assessing and Addressing Modern Slavery

Contact is committed to implementing contracts, policies, and procedures that meet its obligations to help eliminate Modern Slavery in our operations and supply chains.

Contact already has a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers, which are regularly reviewed. The following policies are those that are most relevant to preventing Modern Slavery among our team members and workers in our supply chains:

- Code of Conduct
- Human Rights
- Inclusion and Diversity
- Anti-bribery and corruption
- Discrimination bullying and harassment prevention
- Protected disclosure (whistleblowing)
- Risk Management

Contact is in the process of implementing a Supplier Code of Conduct, which will outline the behaviours we expect from suppliers, particularly around Modern Slavery, human rights, labour standards, and ethical business.

Contact also seeks to implement a Procurement Policy to guide the process of appointing new suppliers, conducting supplier due diligence, establishing supply arrangements, executing supply contracts as well as making purchases and placing orders.

## 6. Contact's Supply Chain

Contact's supply chain encompasses a wide range of goods and services, including geothermal, hydro, and thermal power station supplies, IT hardware and software, vehicles, safety equipment, solar panels, batteries, personal protective equipment / work wear, metering field services, facilities maintenance and construction services. We also purchase gas, electricity and broadband services.

## 7. Consultation and Approval Process

In performing the actions described throughout this Statement, consultation included engagement with Contact's Procurement Working Group, and various business unit representatives with oversight of suppliers and subsidiaries assessed as potentially more exposed to risks of Modern Slavery practices.

We expect to expand our consultation with our subsidiaries and any joint venture partners in FY22.

Our Leadership Team has also been involved in the compilation and endorsement of this Statement, which was approved by the Board.

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Robert McDonald, Chair

Mike Fuge, CEO

**Contact Energy Limited** 

Date: 23 March 2021