



Modern Slavery Statement



Modern Slavery Act 2018 (Cth)

This statement discloses the actions taken by LMS Energy Pty Ltd to address modern slavery in our business and supply chain, during the year ending 30 June 2024.

This statement has been prepared to align with the requirements of the Modern Slavery Act 2018 (Cth) and has been approved by the LMS Energy Board.

Signature of Responsible Member

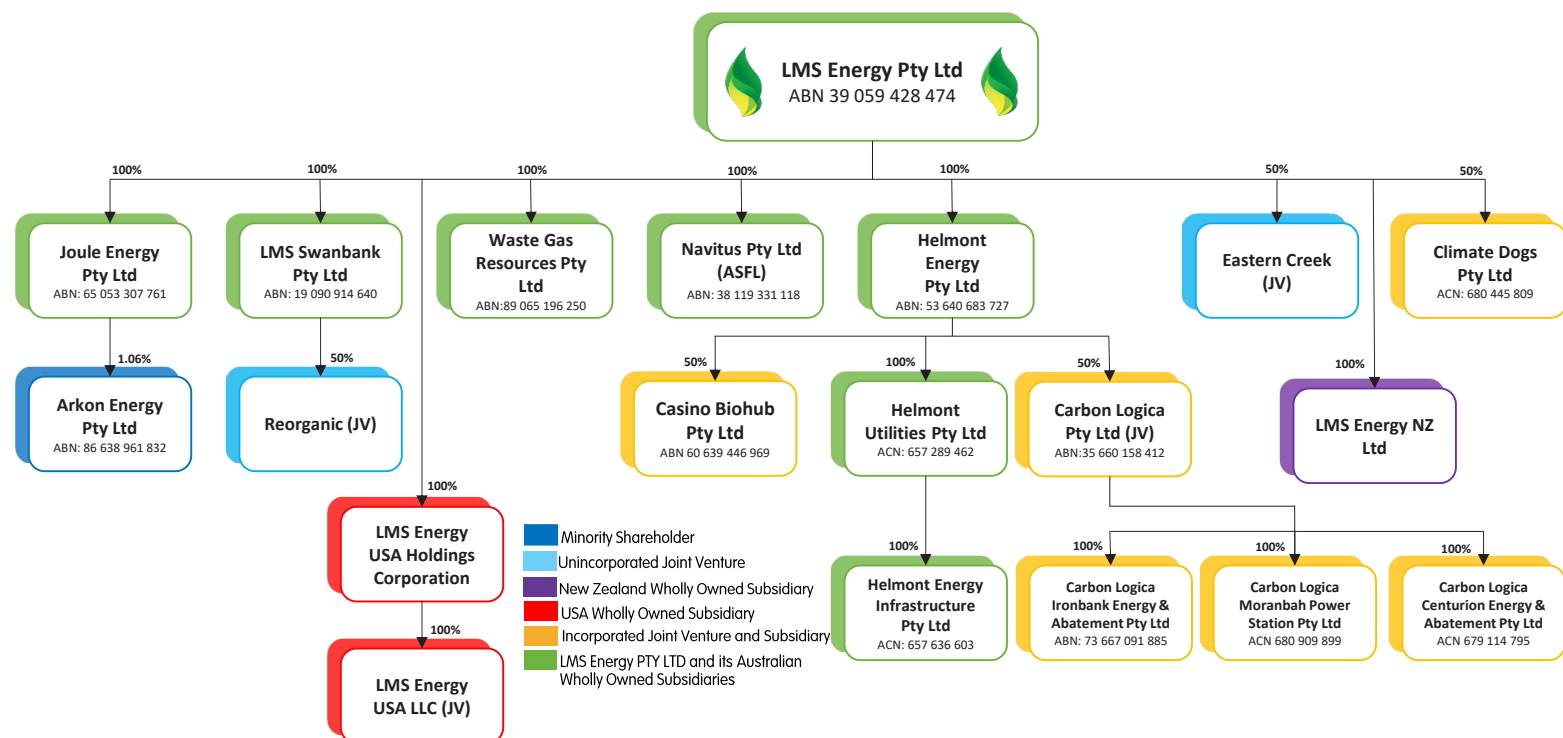
This Modern Slavery Statement is signed by Mr John Falzon in his role as Chair and Director of the Board of LMS Energy Pty ACN 059 428 474) in accordance with section 13 of the Modern Slavery Act 2018 (Cth) on 20 December 2024.



Modern Slavery Statement

Our Structure

LMS Energy Pty Ltd (ABN: 39 059 428 474) is the parent company in the above group that is required to report under the Australian modern slavery laws. LMS Energy is owned approximately 50% by LMS Energy Pty Ltd and 50% by Pacific Equity Partners (PEP)



Consultation with the broader LMS group

Functions within the LMS business are centralised so no consultation was required with any wholly owned subsidiary companies in the group. LMS notes these companies are not reporting entities but all relevant policies are applicable to wholly owned subsidiaries and managed by governing body of the reporting entity.

The Statement does not apply to our joint ventures given LMS does not financially control these entities from a shareholding perspective.



Our Purpose, Vision & Values

Purpose

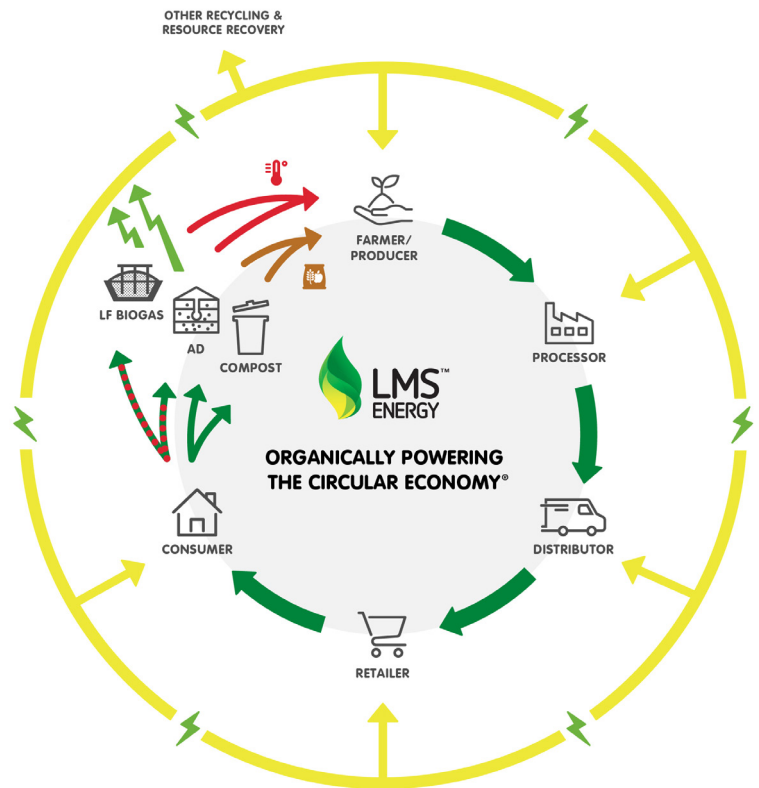
To protect our environment.

To be a great company for our people, our clients and the community.

To challenge the status-quo through innovation.

Vision

Our vision is to be the world's leading bioenergy and methane abatement company, powering the circular economy.



Values



INTEGRITY

PROTECT OUR REPUTATION

- Doing what is right
- Conducting ethical business
- Establishing long-standing partnerships
- Demonstrating ongoing resilience



DEVELOPMENT

GROW OUR PEOPLE

- Retaining excellent employees
- Maximising employee strengths
- Achieving high engagement
- Rewarding employees who create value



SAFETY

NEVER COMPROMISE

- Putting safety first
- Protecting our people
- Leading by example
- Striving for exceptional results



TEAMWORK

ONE TEAM, ONE COMPANY

- Working together, not alone
- Respecting individual differences
- Sharing and transferring knowledge
- Displaying a positive mindset



INNOVATION

THINK SUSTAINABLY

- Challenging the status-quo
- Adapting to change
- Developing new technologies
- Solving problems creatively



COMMITMENT

BUILD TO LAST

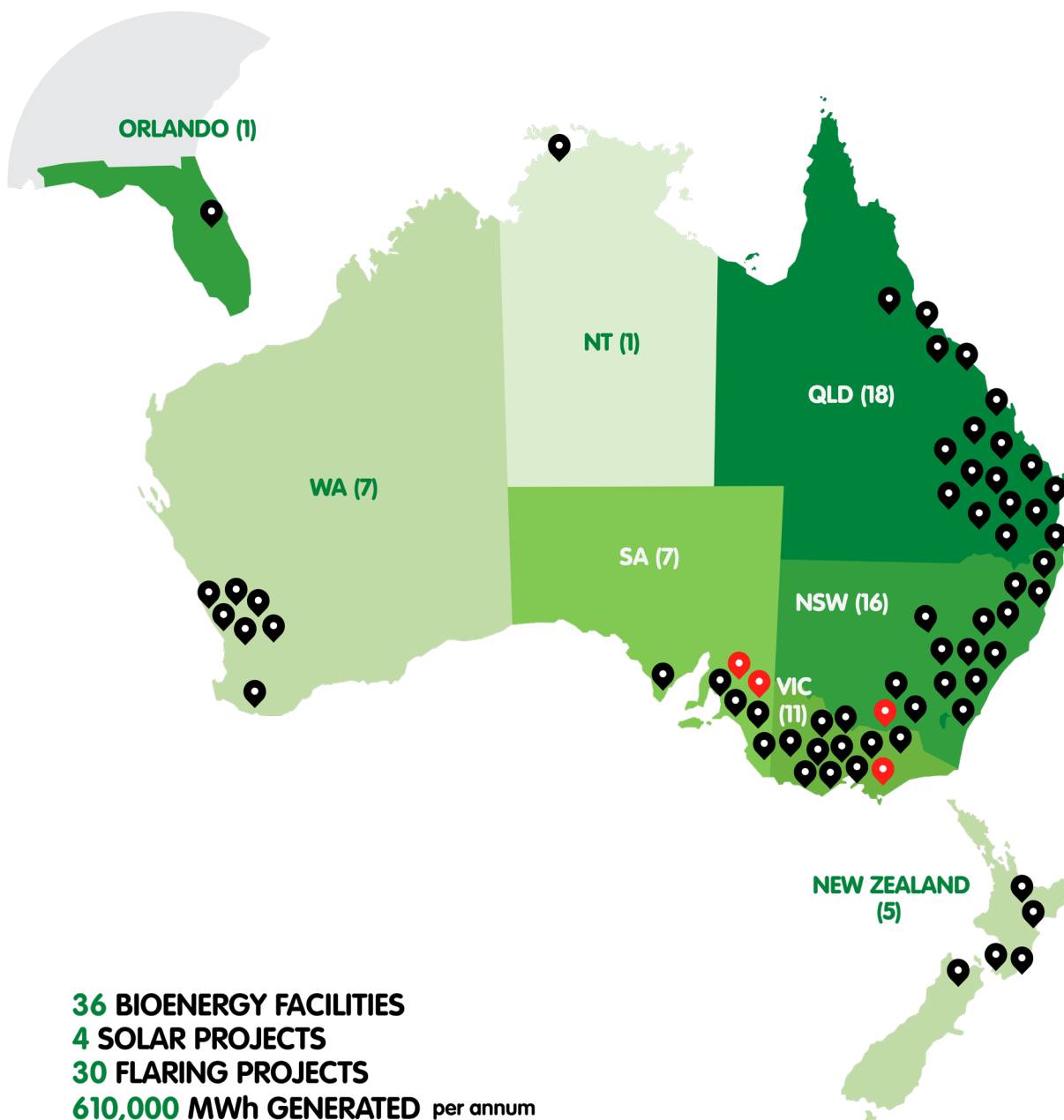
- Pioneering excellence
- Delivering industry-leading projects
- Showing a dedication to being the best, not the biggest
- Having a "can do" attitude



Our Operations

LMS Energy is Australia's largest and most experienced landfill biogas company. The recovery of landfill biogas reduces methane emissions and provides a reliable source of renewable energy. Each year, LMS' projects prevent more than 4 million tonnes of greenhouse gases from being released into the atmosphere, making LMS one of Australia's largest emissions reducers. LMS has successfully delivered more landfill biogas projects than any other Australian company and is highly recognised as an innovator in the industry.

As identified in the map below, LMS operates in Australia, New Zealand, and the United States of America. The Global Slavery Index 2018 suggests that these countries are assessed as having low jurisdictional risk for modern slavery.



36 BIOENERGY FACILITIES
4 SOLAR PROJECTS
30 FLARING PROJECTS
610,000 MWh GENERATED per annum
115,000 HOMES POWERED per annum



Risks in our Supply Chain

LMS has identified potential modern slavery risks associated with the supply chains we engage with and operations through direct engagement with third-party suppliers and indirectly through the companies that supply goods and services to our suppliers. Below is a list of the key supply chains and the prescribed modern slavery risk identified through due diligence.

Risk Management

Supply chain risk assessment

We assessed some of our key industry sectors to identify risks in the context of modern slavery.

Areas of Supply	
Landfill gas capture	LMS uses a variety of landfill gas capture equipment and infrastructure in our operations. These items are sourced both in Australia but also manufactured in other countries, which may have greater modern slavery risks. Additionally, some raw materials used in the landfill gas capture infrastructure could originate from countries known to have high risk of modern slavery (e.g. metals).
Power station consumables	LMS uses a number of power station consumables and fuels in our operations. Gas from landfill gas originates in the countries where we operate (which have low jurisdictional risk of modern slavery). Other power station consumables either originate in countries where we physically operate or are imported. The imported products potentially pose a higher jurisdictional risk of modern slavery compared to the countries where our operations are based.
Professional and technical services	We outsource various professional and technical services such as legal, financial and engineering. Due to the location and nature of the professional services provided, we assess the risk of modern slavery to be low.
Fleet and transportation services	<p>LMS supplies company vehicles to employees where required, and currently there are around 145 vehicles in our fleet. The modern slavery risk in the production of these vehicles would be moderate, as parts of the creation would be outsourced to countries with lower governance.</p> <p>Freight is often used when purchasing items and sending completed items to site that have been manufactured in-house. Due to freight mainly being serviced in Australia, New Zealand and the United States, there is low risk of modern slavery in this area.</p>
Office services	This includes all office information technology supplied to staff, which is inherently a high risk of modern slavery due to the outsourcing from IT companies in producing elements of computer equipment.
Personal protective equipment (PPE) and uniforms	Personal protective equipment is required for many LMS employees who work at landfill sites and in workshops where manufacturing is undertaken. Corporate uniforms are also provided to staff. The risk of modern slavery in this supply chain is high as the products are generally produced overseas with lower levels of governance.



Actions Taken to Address Risk



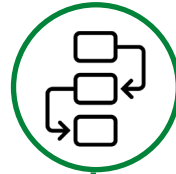
Created a Modern Slavery Questionnaire for suppliers



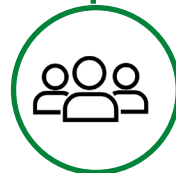
Issuing the Modern Slavery questionnaire to 529 suppliers in LMS' supply chain.



Further strengthening our policies to better support the reduction of Modern Slavery Practices, including rolling out a new Whistleblower Policy that encourages employees to report on any modern slavery activities.



Incorporating recommendations from the gap analysis into our forward looking Modern Slavery Committee objectives.



Increasing members of our Modern Slavery Working Group across different LMS Groups to broaden the scope.

Additional control measures

Respecting human rights and promoting the reduction of modern slavery in our supply chains is inherent in our values, governance and management systems. In addition to the actions described above, we also have the following policies and procedures that promote this cause:

- 1. Code of Conduct** - prescribes the minimum standard of behaviour expected of all LMS employees
- 2. Whistleblower Policy** - provides information to encourage potential whistleblowers to report anything they reasonably believe to be unethical, illegal, fraudulent or undesirable conduct
- 3. Your Call** - external whistleblowing services which is managed independent to LMS to further encourage the reporting of any unethical or unlawful behaviour.
- 4. Diversity, Equity and inclusion committee & Policy** - responsible for encouraging the business to continuously advance improvements across a variety of evolving workplace accountability areas.
- 5. Procurement Policy** - Procurement of the LMS Group are based on the socially and environmentally responsible management of the supply chain.



Evaluating Steps Taken in 2024

In the pursuit of continuous improvement, we have summarised the effectiveness of plans in last year's statement against our actual actions in 2024:

Plan for FY2024	Steps taken in FY2024
Gap analysis – LMS will review our policies and procedures for any more changes that need to be made, in line with our new modern slavery policy. Any risks identified (potentially with external assistance) will be sought to be reduced.	LMS has developed a Modern Slavery questionnaire to be completed by suppliers. To date, LMS has issued this questionnaire out to 529 suppliers in 2024.
Supplier contract review – LMS will insert modern slavery clauses into our legal contracts going forward in consideration of our expectation that counterparties are committed to minimising modern slavery in their business where possible.	LMS has inserted modern slavery clauses into legal contracts as recognition of our expectation that counterparties we deal with are committed to minimising modern slavery in their business.
Finalising procurement and company policy – The draft policies to be finalised and distributed company-wide. We will also consider any other company policies that may need to be amended to address modern slavery.	Procurement policy has been updated to include modern slavery provisions.
Business-wide training – LMS will provide modern slavery training, so employees are aware of what it is, the associated risks to the business and how to take action if required.	LMS is in the process of developing a training module for business-wide distribution, with its completion prioritised as part of our 2025 plans..
Contractual review – LMS will review contracts in our supply chains to understand relative risk.	This analysis formed part of the supplier contract review, where LMS issued all of these questionnaires to key suppliers (including those under contract).



Plans for 2025

1. Develop a short module as an introduction to modern slavery, mandatory for all staff to watch and to be included as part of new employee onboarding.
2. Continue to conduct supplier due diligence to evaluate supplier's practices and policies regarding modern slavery. Develop strategy or information for suppliers who are not mandated to report under the Modern Slavery Act.
3. Develop a forward contracts plan to provide guidance to the business when assessing modern slavery risks in the supply chain and mitigating these during the replacement contract selection process.
4. Supplier engagement and collaboration – talk to key / first tier counterparties that have a modern slavery team set up – have a conversation with them to discuss modern slavery practices and how our businesses can positively influence the reduction of modern slavery practices in our supply chain.
5. Upskilling members of our Modern Slavery Committee through further training and engagement with subject matter experts.





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LEADERS IN METHANE ABATEMENT AND BIOENERGY

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LMS Energy Pty Ltd
ABN 39 059 428 474
118 Greenhill Road Unley
5061 South Australia
Tel (08) 8291 9000
info@lms.com.au