



MODERN SLAVERY STATEMENT

JUNE 2025



Acknowledgement of Country

**We respect and honour First Nations Elders
past, present and future.**

**We acknowledge the stories, traditions
and living cultures of First Nations Peoples
on the lands on which our sites are located
and commit to building a brighter future together.**

*Section of commissioned artwork 'Blue Winds'
by Wiradjuri artist Emma Johnston*

CEO Message



2025 Modern Slavery Statement ENGIE Australia & New Zealand

I am proud to present ENGIE Australia & New Zealand's (ENGIE ANZ) modern slavery statement for 2024. This is our fifth statement under the Modern Slavery Act 2018 (Cth), detailing the progress we have made since our last report to strengthen our systems and improve our ability to identify and address modern slavery risks across our local operations and supply chains.

In 2024, the key activities included:

- continuing to promote and monitor the mandatory modern slavery training for ENGIE ANZ team members, achieving 95%+ compliance and organised an in-person / online whistleblowing session to raise awareness of our whistleblowing platform.
- further updating our standard form modern slavery contract clauses to better reflect the outcomes of learnings from the industry and to help embed best practices in the supply chain.
- embedding the use of the digital Modern Slavery Self-Assessment Questionnaire as part of ENGIE's ANZ operation.
- Reviewing and consolidating our processes for supplier engagement including expanding our independent third party assessments and supplier site visits.

- Engaging key suppliers to enhance their knowledge of risks of modern slavery practices in their own operations and supply chains and ENGIE ANZ's expectations

While ENGIE ANZ has continued to grow in Australia, with an ambitious pipeline of renewables projects, ENGIE ANZ's spend profile has remained relatively consistent compared to the previous reporting period. Accordingly, the risks of modern slavery in our operations and supply chains have aligned.

Our ongoing efforts are directed toward mitigating modern slavery risks through the continuous development of internal expertise and proactive collaboration with suppliers, business partners, and key stakeholders. As we move forward, we are committed to implementing our strategic priorities, with a strong focus on gaining deeper visibility into our supply chains and the potential risks they may present.

A handwritten signature in black ink, appearing to be 'Shannon Hyde'.

Shannon Hyde
Chief Executive Officer
ENGIE ANZ

Introduction

Reporting Entities and Controlled Entities

This joint modern slavery statement has been prepared by International Power (Australia) Holdings Pty Limited ABN 70 105 041 209 (IPAH) for the 2024 calendar year (2024 reporting period) in line with section 14(1) of the *Modern Slavery Act 2018* (Cth) (MSA) in respect of itself and the following reporting entities:

International Power (Australia) Holdings 2 Pty Limited ACN 105 041 307 (IPAH2);

1. International Power (Retail) Pty Limited ABN 18 107 548 854;

2. ENGIE ABN 67 269 241 237 (a partnership comprising IPower Pty Limited ACN 111 267 228 and IPower 2 Pty Limited ABN 24 070 374 293) (formerly Simply Energy); and

3. Pelican Point Power Limited ABN 11 086 411 814.

The above entities (including IPAH) are reporting entities for the purposes of section 5 of the MSA (**reporting entities**). In addressing the mandatory criteria as required by section 16 of the MSA, this modern slavery statement also covers the risks of modern slavery practices in the operations and supply chains of the entities owned and controlled by the reporting entities, and the actions taken by those entities (including the non-controlled entities as at the date of this statement) to assess and address those risks.

A full list of the entities owned and controlled by the reporting entities (**controlled entities**) is set out in Appendix A. A full list of the entities owned but not controlled by the reporting entities (**non-controlled entities**) is set out in Appendix B.

Mandatory Criteria Addressed by Modern Slavery Statement

This modern slavery statement addresses the following mandatory criteria:

MANDATORY CRITERIA	MSA REFERENCES	PAGE REFERENCES
Consultation process between reporting entities, controlled entities and entity giving modern slavery statement	14(2)(c) 16(1)(f)	5
Approval of modern slavery statement	14(2)(d) 16(2)(b)	5
Signing of modern slavery statement	14(2)(e)	5
Identification of reporting entities	16(1)(a)	4, Appendix A, Appendix B
Description of structure, operations, and supply chains	16(1)(b)	6, 7, 8
Description of risks of modern slavery practices in operations and supply chains	16(1)(c)	9, 10
Description of actions taken to assess and address risks of modern slavery practices	16(1)(d)	11, 12
Description of how effectiveness of actions taken to assess and address risks of modern slavery practices are assessed	16(1)(e)	13, 14
Other relevant information	16(1)(g)	15

Consultation Process

IPAH is ultimately owned by ENGIE S.A (**ENGIE**) and is the Australian holding company of the IPAH Group. The IPAH Group is constituted by IPAH and its controlled entities which includes all reporting entities and their controlled entities. During the majority of the 2024 reporting period, IPAH was also ultimately owned by Mitsui & Co., Limited (**Mitsui**) as to 28%. However, in December 2023, International Power Ltd (a wholly owned subsidiary of ENGIE), acquired the remaining 28% of IPAH that it did not own from Karugamo Energy Management Pty Limited (a wholly owned subsidiary of Mitsui). The IPAH Group is now wholly owned by ENGIE.

The members of the IPAH Group operate under common direction and governance and are subject to the same policies, procedures and processes concerning their obligations under the MSA (**modern slavery obligations**). The consultation process for the purposes of preparing this modern slavery statement principally relied upon IPAH receiving inputs from key functional business units operating across the IPAH Group including human resources, procurement, finance, regulation, compliance, sustainability, legal, ethics and corporate affairs. Where higher risks of modern slavery practices were identified in specific operations or supply chains, representatives of entities or functional business units impacted by these risks were also engaged. The company secretaries of the reporting entities were also involved throughout the process. The continual dialogue was done under the guidance of a modern slavery committee chaired by the Head of Procurement which met regularly, including on an informal basis, throughout the 2024 reporting period. This approach ensured a consistent response across the IPAH Group. Finally, the senior leadership team of the IPAH Group with responsibility and accountability for modern slavery obligations also reviewed and approved this modern slavery statement.



Approval of Modern Slavery Statement

This modern slavery statement was approved by the board of directors of IPAH on 24 June, 2025 (including as a higher entity (as defined in the MSA) for IPAH2, International Power (Retail) Pty Limited, ENGIE (the retail partnership) and Pelican Point Power Limited) and has been signed by Shannon Hyde as a director and responsible member of the board of IPAH..

Our Structure, Operations and Supply Chains



STRUCTURE

The structure of each reporting entity is set out in Appendix A and Appendix B.

OPERATIONS

At a global level ENGIE is the ultimate parent company of the ENGIE Group, a global reference in low-carbon energy and services. Together with its 98,000 employees, and its customers, partners and stakeholders, ENGIE is committed to accelerating the transition towards a carbon-neutral world, through reduced energy consumption and more environmentally-friendly solutions. Inspired by its purpose, ENGIE reconciles economic performance with a positive impact on people and the planet, building on its key businesses (gas, renewable energy and services) to offer competitive solutions to its customers. ENGIE operates on five continents. The Group's operational activities are conducted by ENGIE and by its subsidiaries locally through operational organisations; compliance with the ENGIE Group's ethics and compliance principles, including those relating to the respect for human rights and modern slavery, forms an integral part of those operations which are conducted under the responsibility of the respective organisations' management¹.

At a local level, in respect of the reporting period, ENGIE ANZ's vision is to accelerate and support our customers' transition to carbon neutrality by providing innovative sustainable energy solutions to households, businesses, communities and cities in Australia and New Zealand through our portfolio of low-carbon electricity assets and our expertise in smart infrastructure.

The IPAH Group's operations are diverse and cover the following activities in pursuit of ENGIE ANZ's vision:

1. Power Station Ownership and Operation and Associated Electricity Support Services

The IPAH Group owns and operates several low emissions (mainly gas) power stations in South Australia. This includes the Pelican Point Power Station, which is owned by Pelican Point Power Limited, a reporting entity. Pelican Point Power Limited is also the employing entity for its power station staff. These power stations provide electricity to the National Electricity Market (**NEM**) while some also provide electricity support services to the NEM and transmission network service providers.

¹ To find out more about ENGIE's global operations visit: www.engie.com, 'Who we are' and 'Activities'.

2. Wind Farm Ownership and Operation and Associated Products

The IPAH Group owns the Canunda Wind Farm in South Australia, which has been in operation since 2005. It also developed the Willogoleche Wind Farm in 2019. It now owns 25% of the Willogoleche Wind farm via a renewable equity platform for solar and wind energy investment with its partner, Foresight Group Holdings Limited. The Canunda and Willogoleche Wind Farms are operated by the IPAH Group, via operational and maintenance contractual arrangements with the original equipment manufacturers (OEM). The Willogoleche Wind Farm is also managed by the IPAH Group via an asset services agreement. The wind farms provide electricity to the NEM and generate various “green products” such as renewable energy certificates.

3. Solar, Wind and Energy Storage Development

- The IPAH Group is actively involved in the development of solar and wind farms, stand-alone energy storage projects and hybrid generation and storage projects around Australia and currently has several projects under various states of maturity including in:
- South Australia – Willogoleche Wind Farm expansion (Stage 2) and Pelican Point BESS;
- Victoria – Willatook Hybrid Wind Farm/BESS, Goorambat East Solar Farm and Hazelwood (Stage 2) BESS; and
- New South Wales – Hills of Gold Wind Farm/BESS, Silverleaf Hybrid Solar Farm/BESS and The Plains Hybrid Wind and Solar Farm/BESS.

In August 2024 the Goorambat East Solar Farm reached financial close. Construction and commissioning of the 250 MW solar farm is expected to be finished in 2026 and is a major step in progressing ENGIE ANZ’s renewable energy development pipeline and reflects the company’s focus on growth and decarbonisation,

and commitment to delivering 3 GW of renewable energy in Australia by 2030.

4. Energy Retailing – ENGIE

The IPAH Group owns ENGIE (formerly Simply Energy), a gas and electricity retailer with approximately 690,540 customers. ENGIE is a reporting entity and its immediate parent, International Power (Retail) Pty Limited, is also a reporting entity. ENGIE started providing energy in 2005, and today ENGIE provides electricity to customers in New South Wales, Queensland, South Australia, and Victoria, plus natural gas to customers in South Australia, Victoria, Western Australia and some areas of New South Wales. ENGIE supports its customer base via billing and customer service platforms, third party operated call centre operations located in Australia, the Philippines, Fiji and India, and customer support team members (employed by ENGIE) located at head office in Melbourne, Australia. ENGIE also leverages third party capabilities for data and digital solutions in India, Vietnam, and the Philippines.

5. ENGIE Retail Innovation

ENGIE Retail Innovation is a business model, supporting ENGIE, the retailer, and is designed to explore selected new goods, services, and products likely to be part of an energy retailer’s future offerings to assess their commercial viability, and if proven successful, to roll-out as a “business as usual” commercial offering by the retailer, ENGIE Retail. ENGIE Retail Innovation was formally known as Simply Energy Solutions until April 2024 when it was rebranded as part of the Simply Energy rebranding to ENGIE. Simply Energy Solutions Pty Ltd ceased being an employing entity in mid-2024, with all employees transferred to, and now to be employed by, ENGIE Retail, the retailer.

6. Energy Solutions

Until April 2025, the IPAH Group operated a business delivering an electric vehicle (EV) charging network across Australia. The IPAH Group ceased operating this business in April 2025 when the business (including all employees) was acquired by EVE Australia Pty Ltd.

7. Energy Management Services.

The IPAH Group also provides energy management services via a dedicated energy management team. These services are performed by a related ENGIE ANZ entity (including dedicated employees) outside of the IPAH Group, ENGIE Energy Marketing Australia Pty Ltd (**EEMA**). EEMA is part of the global group’s Supply & Energy Management (**S&EM**) business unit. EEMA is responsible, under a contract for services and subject to the IPAH Group’s broader risk appetite, for the commercial optimisation of ENGIE ANZ’s power station assets, its solar and wind farm assets, its retailing operations, and its large business and industrial, and wholesale customer base via considered trading (including physical, renewable, gas, electricity and derivative trading), hedging and risk management strategies. It is also responsible for the provision of expert market analysis to support the optimisation and strategising, as well as supporting functions. The IPAH Group retains deal or transactional commodity origination and the remaining onboarding services, together with associated compliance initiatives.

8. Corporate Services

The IPAH Group provides several corporate services to support its Group entities and various functional business units including the provision of IT applications and infrastructure, legal services, finance and treasury services, lease holdings of corporate offices, and the provision of employees.

Various members of the IPAH Group also engage cleaning and security services in respect of their offices and other sites.



Our Structure, Operations and Supply Chains

SUPPLY CHAINS

At a local level, ENGIE ANZ's diverse operations means a vast and expansive supply chain. In the 2024 reporting period, ENGIE ANZ spent over AUD\$1.3 billion across 900+ suppliers spread across 3 core areas:

- Energy management;
- Projects; and
- Operations.

Much of the AUD\$1.3 billion spend is attributable to ENGIE ANZ's energy management activities, such as supplying gas and electricity to homes, businesses, industrials, and other wholesale customers, while over AUD\$430 million is attributable to projects and general operations.

Energy Management Spend

In the 2024 reporting period, our spend arising from our energy management activities largely involved electricity purchased from the wholesale exchange operated by the Australian Energy Market Operator Limited (**AEMO**), gas purchased from upstream producers and other gas wholesalers such as other retailers (and related services such as distribution and transmission pipeline services), , and hedging and risk management goods and services. This involved active trading with over 68 external counterparties under various contracting arrangements including power purchase agreements, ISDA derivative trading and various renewable purchase contracts.

Project Spend

In the 2024 reporting period, project spend was mainly driven by the commencement of the construction of the Goorambat East Solar Farm,

and by operational improvements to the Pelican Point Power Station.

Detailed project planning, and the establishment of contracts with OEMs and project specialist is central to these projects. An area of particular attention here is the supply of PV modules for the Goorambat Solar Farm. The selected OEM offered a digital traceability system for each batch of modules that enables full traceability of the components. This includes identifying the supplier and location of each component involved in the supply chain of the module, Polysilicon, Ingot, Wafer, Cell and Module. The selected OEM monitors the modern slavery risk and also imposes contractual obligations on suppliers through a supplier code of conduct to ensure adherence to the core conventions and fair provisions of the International Labour Organisation (ILO).

Operations Spend

The bulk of ENGIE ANZ's 2024 Operations spend was with suppliers located in Australia, although in the following key spend categories, local suppliers engaged their overseas operations to supply ENGIE ANZ its services:

- Contact centre operations, located in India, Fiji and the Philippines.
- IT services, located in India, Vietnam and the Philippines.

ENGIE ANZ's spend includes goods manufactured overseas, or goods produced in Australia using materials sourced overseas. The key high-risk goods we identified are noted in the following section of this report.

Identifying Risks of Modern Slavery Practices in our Operations and Supply Chains

ENGIE works with a wide range of equipment and service suppliers, both locally and internationally. ENGIE ANZ considers its suppliers and subcontractors as key stakeholders in the Group's value chain. Our Group's commitments and requirements in its relations with these stakeholders are set forth in our Procurement Charter. This Charter provides amongst others for the following principles governing our Group's purchasing activities:

- Selection and qualification of suppliers using multiple criteria, including societal and environmental (including human rights, in particular the rejection of any form of forced labour).
- Professionalization of staff and development of expertise of the employees in the Procurement network via a progressive, ongoing training program. In 2024, the Procurement Department progressed the embedment of a cross-functional training program (Procurement Academy) which includes a set of mandatory training courses in the following areas: Ethics, Sustainability (Energy Transition and Climate Change), Health & Safety, Management, Diversity and Inclusion, working conditions and IT security.
- Ensuring that all agreements with suppliers are the subject of a written contract that includes a mandatory ethical, environmental and social responsibility clause (including the requirement that they adhere to the Group's human rights commitments. Note – ENGIE's ANZ supplier agreements include ENGIE's Modern Slavery Clauses embedded in the terms).

The ENGIE Group's commitment to the respect for human rights, including explicitly the rejection of Modern Slavery is laid down in a number of key documents, including the following ones which are all publicly available:-

- our Ethics Code of Conduct;
- our Procurement Charter and our Code of Conduct in Supplier Relations; and
- our dedicated Human Rights Policy, called the 'Human Rights Referential: commitments and implementation'.

At a local level (ENGIE ANZ's) our approach to understanding the risks of modern slavery in our operations and supply chains is driven by group policies and requirements and considers the following indicators:

- the country or geographical location from which our goods and services are procured;
- the categories of goods and services we procure;
- the sectors or industries from which we procure our goods or services; and
- the businesses or entities from whom we procure our goods or services.

At ENGIE ANZ we continued to use a range of well-regarded resources to underpin and inform our understanding of these indicators in the context of our operations and supply chains including:

- Dun & Bradstreet's IndueD due diligence tool
- the Verisk Maplecroft Indices², used to assess country and geographical risk;
- the Global Slavery Index³;
- independent assessments conducted by EcoVadis⁴, a CSR ratings tool used globally by the ENGIE Group; and
- supplier self-assessment questionnaires (SAQ); and
- whistleblowing system.

Due to the stable nature of our business activities, we continued to be exposed to largely the same type of risks of modern slavery practices as in 2023 (including with respect to the underlying reasons).

1. <https://www.maplecroft.com/>

2. <https://www.walkfree.org/projects/the-global-slavery-index/>

3. <https://ecovadis.com/>



Identifying Risks of Modern Slavery Practices in our Operations and Supply Chains

MODERN SLAVERY RISK INDICATORS

 forced / bonded labour	 deceptive recruitment	 vulnerable / migrant worker exploitation	 high risk country / geographical location	 child labour
Renewables Industry involved in the renewables industry in asset development and customer solutions (e.g., solar, wind, batteries, green mobility, net-zero solutions, battery energy storage, etc.)			  	
Call Centre & Database Operations outsourced call centre and database operations located overseas			   	
Construction Industry involved with construction industry in asset development, various operation and maintenance activities and as part of decommissioning and site rehabilitation works				
Cleaning and Security Services engagement of cleaners and security personnel to clean and protect office spaces and asset buildings			 	
Labour Hire Services engagement of contractors (including highly specialised and technical labour) including via labour hire firms to provide services who further subcontract those services to other contractors			  	
Electronic Equipment Supply procurement of laptops, computers, mobile phones and other electronic equipment			  	

Assessing and Addressing Risks of Modern Slavery Practices in Our Operations and Supply Chains

The steps ENGIE ANZ takes to assess and address the risks of modern slavery practices in our supply chains varies, depending on which part of ENGIE ANZ leads the management of any given supplier as follows:

Group Managed Suppliers are led by ENGIE's head office in Paris with active support of the local Procurement Team. This is generally the case for categories with high spend and risk used globally, such as wind turbines, solar panels, batteries and other equipment used for many of ENGIE ANZ's capital projects; and

Locally Managed Suppliers are led by ENGIE ANZ's team in Australia. This is the case for the other suppliers, including those with an overseas presence, such as contact centre operations.

GROUP MANAGED SUPPLIERS:

1. All group-managed suppliers undergo an extensive due diligence process, managed by ENGIE's centralised due diligence bureau, before they can be used locally. This consists of a deep-dive into a supplier's operations and identification of any risks that may be present.
2. An assessment of the supplier is also undertaken by EcoVadis to obtain an independent evaluation of the suppliers' human rights, labour rights, sustainable procurement, and environmental credentials.
3. When these checks are completed, the supplier can be used locally by ENGIE ANZ.
4. The information collected is continually monitored as part of the performance management process for each supplier and gaps are addressed by the centralised due diligence bureau.

LOCALLY MANAGED SUPPLIERS:

1. All major locally managed suppliers are prioritised for assessment or investigation based on spend and risk.
2. Suppliers that are selected for review will be assessed as follows:
 - a. by Dun & Bradstreet's IndueD due diligence tool;
 - b. against the Verisk Maplecroft Indices to assess country or geographical risk;
 - c. by EcoVadis, for an independent evaluation of the supplier's human rights, labour rights, sustainable procurement, and environmental credentials; and
 - d. against ENGIE ANZ's Modern Slavery self-assessment questionnaire (SAQ).
3. Either the procurement team or the relevant business stakeholder will seek to address any gaps that may exist as part of the suppliers' regular performance review process.

Case Study

PREVENTING RISKS OF FORCED LABOUR PRACTICES IN THE GROUP'S SUPPLY CHAINS LOCATED IN CHINA

Several years ago, the Group introduced a specific, in-depth vigilance action plan to identify and manage these risks for certain product categories. The Group has agreed to ensure compliance with international laws and actively monitors the situation to ensure that no forced labour is used anywhere along its supply chain located in China. In 2024, the Group continued to exercise enhanced vigilance. This is particularly relevant in Australia, as Goorambat East Solar Farm has commenced construction.

ENGIE has voluntarily reduced its panel of suppliers in relation to the Group's supply chains in China. The Group conducts rigorous ethical checks of its suppliers. To ensure supplier transparency, ENGIE has also established direct communication with each of them to assess their ability to commit and to share the most sensitive information.

The main measures implemented include:

- in-depth supplier due diligence by independent experts who pay particular attention to human rights matters;
- supply chain evidence requested from suppliers;
- a written statement from suppliers not to use forced labour;
- distribution of ethics surveys on forced labour, requiring suppliers to provide documentary evidence showing that they prohibit forced labour;
- stronger contractual clauses (general audit clause, breach of contract in case of failure by suppliers to meet their obligations, supplier's guarantee to comply with local and international regulations governing forced labour, from the procurement of commodities through to the delivery of a product);
- participation in several industry initiatives, including the Clean Energy Council Modern Slavery Working Group (Solar Energy Industries Association in the United States, SolarPower Europe, WindEurope, Global Battery Alliance) in the solar, wind and battery sectors to share and improve risk management practices.

Assessing and Addressing Risks of Modern Slavery Practices in Our Operations and Supply Chains

2024 KEY INITIATIVES

During 2024, in ENGIE ANZ we undertook the following key initiatives to identify, assess, and address risks of modern slavery practices in our operations and supply chains:

1. Strengthen the alignment and collaboration with the groups Ethics, Compliance & Privacy Department (directly responsible for the human rights component of the Vigilance Plan).
2. Updated our Risk mapping in accordance with the Human Rights Vigilance Policy, assessing our activities with regard to their impacts on human rights following the Group's methodology via a dedicated self-diagnostic questionnaire.
3. Consolidated our local procurement activities into one team, enhancing alignment with Group practices and the progressive adoption of consistent ways of working including in regards to Modern Slavery.
4. Embedded the use of the digital Modern Slavery Self-Assessment Questionnaire as part of ENGIE's ANZ operations – 14 submissions considered.
5. Reviewed compliance to the Group Due Diligence process for all major local suppliers.
6. Strengthened the scope of site visits to off shore IT support and call centres.
7. Reinforced compliance to Group requirements on subcontracting, particularly with the level of subcontracting, contractual requirements including reporting and audit rights.
8. Organised an in-person / online whistleblowing session to raise awareness of our whistleblowing platform (97% training compliance).
9. Continued promoting and monitoring the mandatory modern slavery training for ENGIE ANZ team members achieving 98% compliance
10. Engaged key suppliers to enhance their knowledge of risks of modern slavery practices in their own operations and supply chains and ENGIE ANZ's expectations
11. Continued leveraging EcoVadis to encompass more suppliers
12. Reviewed and updated the modern slavery resources available to employees via our dedicated section on the intranet
13. Reviewed and updated the modern slavery resources available to suppliers via our dedicated section on the internet
14. Continued updating and reviewing contract terms and conditions to ensure modern slavery requirements are effectively promoted and contracted
15. Had key members of the organisation participating in Modern Slavery forums, working groups and events to enhance awareness, share best practices and discuss effective strategies to reduce and manage Modern Slavery risks in the supply chain.

Effectiveness of Our Actions

The Group monitors the application of key processes and presents some quantitative and qualitative results in the ethical compliance report and in the internal control system.

2024 Group results

90.3%

EMPLOYEES
RECEIVED
ETHICS
TRAINING
GLOBALLY

WITH



2,627

employees trained
by the Group on
human rights



17,263

employees trained
by e-learning on
human rights

60%

from operational functions
and more than half of these
from at-risk entities

Other training sessions are
also organised by the entities
on human rights matters

INTERNAL CONTROL

81.8%

OF THE GROUP'S ENTITIES ASSESSED THE
ROLLOUT OF THE VIGILANCE PLAN AT
THEIR LEVEL AS EFFECTIVE
(MAXIMUM LEVEL 4 ACCORDING TO THE
INTERNAL CONTROL REFERENCE SYSTEM).

93.4%

OF THE GROUP'S ENTITIES ASSESSED
THE ROLLOUT OF THE HUMAN RIGHTS
VIGILANCE POLICY AT THEIR LEVEL
AS EFFECTIVE.



ETHICS COMPLIANCE REPORT

95%

COVERAGE OF THE
ANNUAL HUMAN RIGHTS
RISK ASSESSMENT.

100%

PARTNERS VERIFIED BY DUE DILIGENCE
PROCEDURES (WITH HUMAN RIGHTS RISK)
AS PART OF THE GROUP'S INVESTMENT
COMMITTEES.



Effectiveness of Our Actions

At a local level (ENGIE ANZ), there are multiple activities we have in place to identify, assess, and address risks of modern slavery practices in the operations and supply chains and how we measure the effectiveness of these activities.

NO	CATEGORY OF ACTIVITY	DESCRIPTION OF ACTIVITY	EFFECTIVENESS MEASUREMENT (IN RESPECT OF EACH REPORTING PERIOD)
1	Board Oversight	Regular board updates to ensure adequate oversight.	number of board reports regarding modern slavery in line with ENGIE ANZ oversight requirements
2	Modern Slavery Committee	Cross-functional membership of modern slavery committee holding regular meetings to co-ordinate modern slavery initiatives.	- degree of cross-functional membership - number of meetings held
3	Policies and Procedures	Continual review of policies and procedures in line with legislative and ENGIE ANZ requirements and plan for reporting period.	number of policies and procedures reviewed in line with legislative and ENGIE ANZ requirements and plan for reporting period
4	Training	Training opportunities for employees on ethical sourcing and modern slavery.	- number of training opportunities provided - number of employees trained on ethical sourcing and modern slavery
5	Whistleblower Platform	Anonymous and confidential whistleblower platform to cover modern slavery concerns.	- number of initiatives to increase awareness of whistleblower platform and its availability to report modern slavery concerns - number of modern slavery reports received - number of modern slavery reports requiring investigations
6	Contract Terms and Conditions	Contracts with modern slavery clauses aligned with ENGIE ANZ expectations.	% of key suppliers on standard form contracts (which by default contain modern slavery clauses) % of key suppliers on non-standard form contracts containing modern slavery clauses aligned with ENGIE ANZ expectations
7	Risk Assessments of Supply Spend	Risk assessments on categories of supply and key suppliers.	- determination of key suppliers based on spend - determination of categories of supply with high risk indicators
8	Supplier Engagement	Supplier engagement initiatives.	number of engagement initiatives with suppliers
9	Supplier Due Diligence and Onboarding Procedures	Supplier due diligence and onboarding procedures to specifically require modern slavery assessment prior to contract award based on risk assessments.	% of suppliers successfully onboarded prior to contract award % of suppliers successfully reviewed post contract award - progress of any remedy and action plans
10	Self-Assessment Questionnaires (SAQ)	- self-assessment questionnaires sent to targeted suppliers - continual review of SAQ in line with plan for reporting period	- number of SAQs sent to targeted suppliers - number of responses received from targeted suppliers - progress of any remedy and action plans based on results of SAQs
11	Third Party Audits	Independent third party social, ethical and sustainability audits of targeted suppliers.	- number of audits completed of targeted suppliers - progress of any remedy and action plans based on results of audits
12	Internal Audits	Internal desk top audits of targeted suppliers in line with plan for reporting period.	- number of audits completed of targeted suppliers - progress of any remedy and action plans based on results of audits
13	Site Visits	Site visits of outsourced functions (e.g., call centre operations).	number of site visits of outsourced functions
14	Victim Remedies	Supplier remedies for victims.	number of victims provided with a remedy from the supplier



Future Actions

For ENGIE ANZ our priority areas to address in forthcoming reporting periods are:

1. Continue working with the Group Ethics, Compliance & Privacy Department and with the local Modern Slavery Working Group, to better identify, manage and reduce Modern Slavery risk associated with our local operations.
2. Updated the local Risk mapping in accordance with the Group's Human Rights Vigilance Policy, developing relevant actions plans as required.
3. Continue using the Modern Slavery Self-Assessment Questionnaire as key tool to select and manage suppliers.
4. Continue participating in global and local working groups, sharing learning, risk and best practices that could help eliminate Modern Slavery.
5. Implement an enhanced procurement systems, improving the qualification, onboarding and management of suppliers.
6. Review and consolidate our local vendor master, better categorising vendors across categories of spend and risk related variables.
7. Progress the establishment of a panel of recruiting companies ensuring Modern Slavery requirements are actively considered.
8. Continue focusing on high risk categories and the deployment of relevant strategies including:
 - a. Strengthen our contractual provisions
 - b. Onboarding new suppliers located in lower-risk countries
 - c. Conducting audits
 - d. Supporting industry initiatives that help monitor and reduce the Modern Slavery risks

Appendix A – Controlled Entities

The table below lists the entities controlled by the reporting entities of the IPA Group (controlled entities). The table also highlights the structure of each reporting entity (highlighted rows) within the IPA Group. In total, the IPA Group employs approximately 339 people.

ENTITY	ABN / ACN	LEGAL CLASSIFICATION	EMPLOYEES	CONTROLLED ENTITIES
GDFSM Finance Pty Limited	ABN 87 169 616 219			
Goorambat East Solar Farm Holdco Pty Ltd	ABN 46 652 230 101			
Goorambat East Solar Farm Pty Ltd ⁵	ABN 60 585 057 338			
Goorambat East Solar Farm Trust	ABN 60 585 057 338			
Gregory Solar Farm Holdings Pty Ltd	ABN 26 629 913 873			
Gregory Solar Farm Pty Ltd	ABN 49 621 773 822			
Hills of Gold Wind Farm Holdings Pty Ltd	ABN 18 644 945 380			
Hills of Gold Wind Farm Pty Limited	ABN 28 145 173 324			
International Power (Australia) Holdings 2 Pty Limited (IPA2)	ACN 105 041 307	Proprietary limited company incorporated in Australia	0	IPA Group (excluding IPA)⁶
Allmontes Development Pty Ltd	ACN 664 446 619			
IPA Investments Australia Pty Limited	ABN 54 654 150 786			
IPA Investments Finance Pty Limited	ABN 57 654 151 167			
IPA Investments Holdings Pty Limited	ABN 25 654 150 160			
International Power (Australia) Holdings Pty Limited (IPA)	ABN 70 105 041 209	Proprietary limited company incorporated in Australia	178	IPA Group
International Power (Australia) Pty Ltd	ABN 59 092 560 793			
International Power (Energy) Pty Ltd	ABN 53 062 798 510			
IPA Client Solutions Australia Pty Ltd	ABN 23 648 461 607			
International Power (Retail) Pty Limited	ABN 18 107 548 854	Proprietary limited company incorporated in Australia	0	• IPower Pty Limited • IPower 2 Pty Limited • ENGIE (a partnership comprising IPower Pty Limited and IPower 2 Pty Limited) (formerly Simply Energy) • Simply Energy Solutions Pty Ltd • IP (Australia) Energy Ventures Pty Limited
International Power Wind Holdings Pty Limited	ACN 128 574 096			
IP (Australia) Energy Ventures Pty Limited	ABN 76 164 669 505			
IP Wind Power Holdings Pty Limited	ACN 128 576 590			
IP Wind Power Pty Limited	ABN 74 128 577 953			
IPA FIFL Pty Limited	ACN 107 397 544			
IPM (Kwinana) Pty Ltd	ABN 93 067 541 655			
IPM Operation & Maintenance Kwinana Pty Ltd	ABN 95 067 541 664			
IPower 2 Pty Limited	ABN 24 070 374 293			
IPower Pty Limited	ACN 111 267 228			
Kwinana Power Holdings Pty Ltd	ABN 56 623 025 276			
Kwinana Power Partnership (a partnership comprising Kwinana Power Holdings Pty Ltd and IPM (Kwinana) Pty Ltd)	ABN 73 716 913 533			
Pelican Point Power Limited	ABN 11 086 411 814	Private limited company incorporated in England & Wales	37	None
Perth Power Partnership (a partnership comprising Kwinana Power Partnership and RATCH-Australia Energy (Kwinana) Pte Ltd) ⁷	ABN 62 611 338 990			
Silverleaf Solar Farm Holdings Pty Ltd	ACN 629 913 891			
Silverleaf Solar Farm Pty Ltd	ABN 73 630 027 360			
ENGIE (a partnership comprising IPower Pty Limited and IPower 2 Pty Limited) (formerly Simply Energy)	ABN 67 269 241 237	Unincorporated partnership	124	None
Simply Energy Solutions Pty Ltd	ABN 86 165 627 396			
Synergen Power Pty Limited	ABN 66 092 560 819			
Warhook Solar Farm Holdings Pty Ltd	ACN 629 913 908			
Warhook Solar Farm Pty Ltd	ACN 630 027 413			

5. Trustee for the Goorambat East Solar Farm Trust.

6. IPA2 holds a 99% interest in each of IPA Investments Australia Pty Limited, IPA Investments Finance Pty Limited and IPA Investments Holdings Pty Limited. The other 1% is owned by International Power Ltd Company Number 02366963.

7. RATCH-Australia Energy (Kwinana) Pte Ltd ARBN 092 883 988, an entity external to the IPA Group, holds a 30% interest in the Perth Power Partnership.

Appendix B – Non-Controlled Entities

The table below sets out the entities directly owned but not controlled by IPA2 and indirectly owned by not controlled by IPA. IPA2 directly owns 25% of these entities, while IPA indirectly owns 25% by virtue of its 100% ownership of IPA2. The remaining 75% interest in these entities is owned by an investment fund under the management of the Infrastructure Capital Group, a specialist, independent infrastructure fund management firm. A controlled entity of IPA2, International Power (Australia) Pty Ltd, is the asset services manager of the Willogoleche Wind Farm, owned by Willogoleche Power Pty Limited as trustee for the Willogoleche Operating Trust.

ENTITY	ABN / ACN	LEGAL CLASSIFICATION	EMPLOYEES	CONTROLLED ENTITIES
ARET Platform Pty Limited	ABN 29 644 811 763			
Australian Renewables Energy Trust	ABN 13 860 919 939			
Willogoleche 2 Finance Pty Ltd	ACN 663 721 284			
Willogoleche 2 Holding Trust				
Willogoleche 2 Holdings Pty Ltd	ACN 663 707 328			
Willogoleche 2 Pty Ltd	ACN 663 709 813			
Willogoleche Holding Trust	ABN 54 165 306 720			
Willogoleche Operating Trust	ABN 42 876 095 992			
Willogoleche Power Finance Pty Limited	ABN 18 619 933 827			
Willogoleche Power Holdings Pty Limited	ACN 112 307 605			
Willogoleche Power Pty Limited	ABN 22 112 307 589			
Willogoleche 2 Operating Trust				





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