Modern Slavery Statement

2024



EnergyAustralia

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Australian Modern Slavery Act 2018 reporting criteria

01		Page/s
a)	Identify the reporting entity	4
b)	Describe the structure, operations and supply chains of the reporting entity	4 - 10
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	7, 9 - 10
d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	7 - 8, 10 - 12
e)	Describe how the reporting entity assesses the effectiveness of such actions	13 - 14
f)	Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	17
g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	15 - 17



Message from the Managing Director



We are pleased to publish EnergyAustralia's 2024 Modern Slavery Statement, setting out our commitment to ethical and responsible business operations.

At EnergyAustralia our purpose is to lead and accelerate the clean energy transformation for all. As we transition to a low carbon future, we do so with the knowledge that it will present challenges across local and global supply chains. We have zero tolerance for the human rights abuse that is modern slavery. Our focus on ethical governance practices is fundamental to EnergyAustralia's

ability to deliver sustainable value for our people and the communities in which we operate.

We have stringent processes and practices in place to mitigate the risks of modern slavery throughout our business and wider supply chain, and these are regularly reviewed and audited.

Addressing modern slavery involves working collaboratively with our suppliers along with industry stakeholders, partners and Government, to understand where risks are, and where we need to adapt and evolve.

The very nature of modern slavery is that it is deceptive and hidden, therefore eradicating it is challenging yet critical. EnergyAustralia is committed to always operating with ethical and transparent intent, with a view to continually evolving our program.

Sincerely,

Mark Collette Managing Director, EnergyAustralia



About this Statement

Reporting Entity

This Modern Slavery Statement is made under the *Modern Slavery Act 2018 (Cth)* (the Act) by EnergyAustralia Holdings Limited (EAH) (ABN 57 101 876 135) on its own behalf and on behalf of the following controlled subsidiary companies, which meets the reporting entity criteria of the Act:

- EnergyAustralia Pty Ltd (99 086 014 968)
- EnergyAustralia Yallourn Pty Ltd (47 065 325 224)
- EnergyAustralia NSW Pty Ltd (75 163 935 635)
- EnergyAustralia Tallawarra Pty Ltd (69 081 074 142)
- EnergyAustralia Ecogen Pty Ltd (86 086 589 611)
- EnergyAustralia Investments Pty Ltd (27 113 121 592)
- EnergyAustralia AusPower Pty Ltd (83 073 060 054)

As of 31 December 2024, the EnergyAustralia Holdings Limited Group comprised of 44 controlled subsidiary entities (Companies and Trusts) and 3 Joint Venture entities. Together, EnergyAustralia Holdings Limited and its controlled subsidiary entities are referred to as EnergyAustralia. EnergyAustralia is a wholly owned subsidiary of CLP Holdings Ltd (CLP).

The Boards of EnergyAustralia's reporting subsidiary companies and the Board of EnergyAustralia Holdings Limited have reviewed this Modern Slavery Statement. This Statement has been approved by the Board of EnergyAustralia Holdings Limited on behalf of all reporting entities and it is signed by the Managing Director and Chair. This Statement has been prepared to meet the mandatory reporting criteria set out under the Act.

About EnergyAustralia

Our structure

As one of Australia's largest energy retailer and generators, we have 1.6 million customers or 2.44 million accounts, across the eastern seaboard, from Southern Queensland, down to New South Wales, Australian Capital Territory, Victoria and South Australia.

CLP

EnergyAustralia is a wholly owned subsidiary of Hong Kong listed CLP Holdings (CLP) and one of Australia's largest integrated energy businesses. CLP was founded in 1901 in Hong Kong and entered



Australia in 2001 by acquiring a majority interest in Yallourn Energy. In 2011, CLP completed the acquisition of energy retailer EnergyAustralia. CLP has a strong focus on governance and ethical business practices.

Retail

As an energy retailer as well as a generator, we buy and generate electricity and purchase gas on behalf of our customers. We provide billing and account management services for our customers, as well as offer innovative energy products and services behind the meter.

Generation

As at 31 December 2024, we currently have around 4,800 MW of electricity generation capacity. In addition, EnergyAustralia currently has the rights to more than 859 MW of solar and wind farm PPAs and owns 50% of the Cathedral Rocks Wind Farm.

While some PPAs have rolled off in the last 15 months, the capacity in our portfolio will always fluctuate depending on the duration of each agreement; and therefore the activity to secure sufficient capacity to meet our renewables ambition remains ongoing and a core focus.

Generation and Storage assets				
Name of power station	Location	Fuel	Registered capacity*	Expected closure date
Yallourn	Victoria	Brown Coal	1480 MW	mid-2028
Mount Piper	New South Wales	Black Coal	1430 MW	by 2040
Newport	Victoria	Gas	500 MW	2039
Jeeralang	Victoria	Gas	432 MW	2039
Hallett	South Australia	Gas	217 MW	2050
Tallawarra A	New South Wales	Gas	440 MW**	2043
Tallawarra B	New South Wales	Gas	320 MW	2053
Cathedral Rocks	South Australia	Wind	33 MW equity	2030
Wooreen BESS	Victoria	Battery	350 MW (Agreed Capacity)***	N/A

Our current and committed generation and storage assets are outlined in the table below.

* Registered capacity can differ from maximum capacity or scheduled capacity for these assets.

** A scheduled upgrade is underway to increase the registered capacity to 480 MW.

*** Wooreen BESS is not yet registered.

Since the release of our inaugural Climate Transition Action Plan in 2023, we have made significant progress. We have been awarded support for the Wooreen and Hallett battery projects under the Federal Government's Capacity Investment Scheme. We have secured 230 MW of renewable energy through Power Purchase Agreements and commissioned Australia's first peaking power station with direct emissions offset, Tallawarra B. Our plan to close the Yallourn power station in mid-2028 continues to move forward. We have more to do, but we are proud of the recent progress we have been able to achieve and will continue to focus on delivery amid the market challenges.



Workforce

Our people are our greatest asset. As at 31 December 2024 we employed 2255 people across our generating sites, head office in Docklands, Victoria, and our Geelong contact centre. We are committed to having a diverse and inclusive workforce, this includes gender, sexual orientation, gender identity, age, disability, marital or family status, ethnicity, nationality, cultural backgrounds, perspectives, and other areas of difference. Women make up almost 40% of our workforce, and women represent 55% of our Executive Leadership Team.

We remain focused on delivering our <u>Reconciliation Action Plan (RAP</u>); supporting parents through our leading parental leave policy; and continue to work to gender equality and inclusion of LGBTQI+ people. Our EA Way behaviours represent the core of who we are when we are at our best and guide the way we work together to achieve our strategy and aspiration to "lead and accelerate the energy transformation for all". Our EA Way behaviours are Be Purposeful, Be Bold and Move Fast, Make a Difference, and Play More Together.

Governance

All EnergyAustralia entities operate in accordance with group wide Procurement Policies and Processes including our Modern Slavery policies and processes. EnergyAustralia's Modern Slavery Policy outlines EnergyAustralia's stance on modern slavery and how risks of modern slavery within our operations and supply chain are to be identified, assessed and addressed. Our Modern Slavery Policy is supported by other policies, processes and systems described in this Statement.

The independent Board of EnergyAustralia Holdings Limited has oversight of our compliance with legal and regulatory matters.

As part of its governance structure, EnergyAustralia has an Audit and Risk Committee which functions to review the effectiveness of our risk management systems for both financial and non-financial risks and internal controls, and the systems and procedures for compliance with applicable legal and regulatory requirements.

The Executive Sustainability Committee supports the Board Sustainability Committee and meets monthly. Sustainability at EnergyAustralia means how we conduct business sustainably through a commitment to making a positive impact on health, safety, employee wellbeing, the environment, climate change and the net zero transition, the community and cultural heritage. Our approach to Modern Slavery is part of this important commitment. The Executive Sustainability Committee is accountable for the performance of the business in relation to Sustainability.



The Executive Sustainability Committee's charter includes reviewing the effectiveness of our programs based on our continuous improvement ambitions, as well as providing recommendations, information, and reports to assist the Board Sustainability Committee fulfil its responsibilities.

In turn, the Board Sustainability Committee will assist the Board and management in the oversight and review of EnergyAustralia's objectives to be a sustainable organisation. They will review and monitor key sustainability policies, strategies and programs, including those related to Modern Slavery.

About our operations

i. Overview

EnergyAustralia employs nearly 2255 people all based in Australia. Most of our workforce are engaged directly via employment contracts and/or enterprise agreements on a permanent, fixed/maximum term or casual basis. Our employment contracts, enterprise agreements and workplace policies are regularly reviewed to ensure compliance with workplace laws, including the *Fair Work Act 2009 (Cth)* and National Employment Standards.

All forms of modern slavery and related behaviour are forbidden under EnergyAustralia's Code of Conduct, Workplace Behaviour Policy and Modern Slavery Policy. We also have a comprehensive Work Health and Safety (WHS) policy and site-specific WHS procedures regarding working conditions. Our employees and extended workforce undertake mandatory annual training in relation to the Code of Conduct. All policies are reviewed and updated at least every 2 years.

ii. Risks of modern slavery (in our workforce)

An internal audit focusing on EnergyAustralia's hiring policies and practices was completed in 2022 with no significant risks of modern slavery in our operations identified. Audits are undertaken every 4 years. We acknowledge that while no current significant risks were found in that assessment, this does not guarantee that instances of modern slavery cannot occur. As such, People and Culture policies and practices are reviewed every 2 years to ensure compliance.

iii. Actions taken to address modern slavery risks

EnergyAustralia has several mechanisms in place to capture employee concerns and grievances, including those relating to modern slavery. These are communicated to all employees on commencement as part of induction processes and then regularly to people via the company intranet, direct emails and annual online training and include:

• Grievance policy and procedures

- Whistleblowing program
- Anonymous Employee Engagement Survey
- Code of Conduct
- **Integrum** our Incident Management system to report any health and safety hazards, near misses and incidents.

Registers are maintained to record any allegations or breaches related to policy and compliance by the People and Culture, Group Internal Audit, Legal and Governance and HSSE functions.

iv. Effectiveness of grievance mechanisms

During 2024, of the mechanisms we have in place to raise a grievance, complaint or concern, zero modern slavery breaches were reported. In the instance that an allegation of modern slavery was made in our operations, it would be reviewed and comprehensively investigated by a senior member of EnergyAustralia's People and Culture team and Group Internal Audit. Any breach of our policies or procedures could result in measures such as individual disciplinary action, corrective operational changes, or a review of compliance controls.

Zero instances related to modern slavery have been reported in 2024 through the Grievance policy, whistle-blower program, engagement survey or our incident management system.

About our supply chain

i. Overview

As of 31 December 2024, EnergyAustralia had 2,715 active suppliers, 1559 (57 per cent) of which are classified as Australian small businesses. 95 per cent of our suppliers are registered with an Australian address, including several multinational suppliers with Australian headquarters, and these suppliers represented 98.4 per cent of our expenditure in 2024. In 2024, EnergyAustralia's total spend with suppliers was \$904 million for goods and services, and \$1.353 billion for spend for fuel (coal and gas) for a total of ~\$2.3 billion.

Many of our suppliers have supply chains that are outside Australia. We rely on supplier Self-Assessment Questionnaires to report about their own operations and supply chains, and independent third-party data. We use this information in conjunction with human rights reports, media articles and our risk framework to assess the risk of modern slavery in our supply chain (see below).



ii. Risks of modern slavery

According to the Global Slavery Index 2023, Australia imports an estimated \$USD 17b of products with a high risk of modern slavery. These products include electronics, solar panels, clothing and textiles, products that EnergyAustralia obtains from our suppliers through global supply chains. It is possible that EnergyAustralia could be directly linked to modern slavery if any of the goods that are imported to Australia and purchased by us were produced, transported and provided using modern slavery at any point in the supply chain. We recognise that the risk of modern slavery is more likely to be higher in the lower tiers of our supply chain, where we have less visibility and influence. Through discovery sessions with our large and multinational suppliers we are increasing our knowledge of their complex supply chains to understand how they utilise their influence to reduce the risks of modern slavery.

Our Risk Assessment Framework considers risk factors based on registered supplier location and the commodity or product they provide. In addition to our own due diligence, we use independent external data, and other independent research to determine the risk of the commodities and products we purchase. We use an independent third-party data service which provides us with information on sanctions, watchlists and adverse media data to understand supplier risk across a range of areas, including modern slavery.

In 2024, we had 4 suppliers who were registered in three potential high-risk geographic locations for modern slavery: India, China, and the Philippines. EnergyAustralia also has out-sourced call-centres and back of house services in the Philippines and India. We monitor these services in accordance with our policies, processes and frameworks. We have not found any evidence of Modern Slavery risk in our back of house/call centre suppliers (source: TYS). Our contracts have stringent terms requiring vendors to comply with laws, Regulations and EA Policies and Procedures and we have governance practices in place with our suppliers and regular oversight of vendor performance.

The commodities we consume that are high risk are:

Solar collect devices/solar panels

There are multiple allegations of modern slavery in the global solar supply chain, particularly in relation to polysilicon production, connected to the Xinjiang Uyghur Autonomous Region (XUAR) of China. Independent research and foreign Government legislation have guided our assessment of risk in this area.

Batteries

We are aware of the modern slavery risks, including child labour, in the mining of cobalt in DR Congo, a key component of lithium-ion batteries. We are also aware of recent allegations about forced labour being used in the production of lithium-ion batteries.



Electronic Goods (including computers, communication devices, electronic hardware, office machines and domestic appliances)

The electronic manufacturing industry has had numerous allegations of modern slavery through all levels of the supply chains of componentry including in the sourcing of raw materials from high-risk geographies. The industry is at risk of forced labour and human trafficking including the use of migrant labour particularly in countries where electronics are predominantly produced.

Clothing and Footwear

Multiple allegations, both current and historical, have been made in relation to the manufacture of clothing and footwear, in multiple countries. Reports also claim that cotton from Xinjiang Uyghur Autonomous Region is produced by forced labour and laundered through other countries to hide its point of origin.

Security and Cleaning Services

Security and Cleaning Services are considered a high risk of modern slavery in Australia due to the prevalence of sub-contracting arrangements in the industry and high rates of migrant labour.

Personal Protective Equipment (PPE)

The Australian latex and nitrile glove industry have reported on forced labour found in their factories and supply chains.

iii. Assessing modern slavery risks

In 2024 we implemented a new supplier onboarding and risk management tool, Trust Your Supplier (TYS). This tool allows us to have a risk view of suppliers, through utilising an independent third-party data service, and to send and receive questionnaires to suppliers. Two questionnaires relate directly to modern slavery risk, and all new suppliers are required to complete the assigned questionnaires before they can be onboarded. Large companies (companies with over 100 employees) are assigned the Employment Standards questionnaire which covers: percentages of migrant, child, refugee, itinerant and prison workers; recruitment fees; document retention; pay deductions; and company labour policies. Small and Medium sized Enterprises (SMEs) complete the Human Rights and Modern Slavery questionnaire. This questionnaire is shorter in length, asks the supplier about whether they have a Human Rights or Modern Slavery policy as well as whether any of their workers are migrant, child, refugee, itinerant, child, refugee, itinerant or prison workers.

The TYS platform captures organisational size, location and key personnel, and has a range of other questionnaires we have adopted as standard such as Ethics and Compliance, Company Operations, Anti-Bribery and Anti-Corruption, Information Security, Conflict Minerals, Diversity, Equality and Inclusion, Supplier Diversity, Government Relations, Labour Hire Licencing, Sustainability and Insurance.



In 2024, we asked 455 suppliers to complete one of the two questionnaires that cover modern slavery. We also received 9 responses to our previous Modern Slavery and Responsible Procurement questionnaire. This represents, in total, 65.1% of our 2024 spend. By 31 December 2024, we had received 188 (41.3%) questionnaire responses. Much of the gap in responses is based on our first wave of invites to register on TYS, which triggered the relevant questionnaires, to 300 existing critical suppliers in late November 2024. We will continue working with suppliers to register on Trust Your Supplier and to complete the questionnaires.

As part of our supplier onboarding process, all suppliers are asked to confirm that they will abide by our <u>Supplier Code of Conduct</u> (the Code). We expect our suppliers to read, understand and ensure that their business, suppliers and subcontractors meets these standards and comply with the Code. This includes paying wages and benefits in accordance with the law; workers not exceeding local work hour limits or 60 hours per week; and prohibiting the use of forced labour or child and underage labour.

For the suppliers who completed our questionnaires, 55 small and medium sized suppliers indicated that they did not have a Human Rights/Modern Slavery policy. The questionnaire allows suppliers to select a date when they will have a policy in the future. For those organisations that are medium sized enterprises, we will follow up with them on those future dates to understand their progress in developing the relevant policy.

Where large enterprises indicate that they have a high level of migrant or refugee workers, we examine the entirety of their questionnaire response, including reviewing all submitted policy documents. This information combined with whether there is any adverse media for the company in relation to their labour practices, guides us in understanding the modern slavery risk of the supplier. In the two instances of suppliers who reported a high percentage of migrant workers, both companies had suitable workplace policies and no adverse media relating to labour practices.

We continued our deep dive into the supply chains with our solar panel suppliers, using publicly available information as well as asking our current and potential suppliers to provide us with visibility of their polysilicon supply chain back to raw materials.

In 2025 we will commence deeper dives into the supply chains of our battery suppliers, using publicly available information and asking suppliers to provide us with more visibility of their supply chains.

For our other high-risk commodities, we are leveraging the information available in the TYS platform and independent reports to ensure we hold up to date information of the risk in our supply chain.

For the purchase of international carbon offset certificates, EnergyAustralia sources reports from independent third-party project verifiers for major purchases which, in part, examines the human rights risk of projects. These reports guide EnergyAustralia whether to purchase from the carbon offset project based on the risks of modern slavery in the supply chain or ownership of the project.



iv. Policies and contractual terms

Our <u>Purchase Order terms</u> and contract precedents require suppliers to confirm that they consider the risks of modern slavery in their operations and supply chain and will notify us of any suspected or actual instances of modern slavery within their operations and supply chain.

v. Investigating allegations of modern slavery

EnergyAustralia actively monitors various sources for relevant information that can help inform our understanding of risks. We are aware of allegations of modern slavery at an industry level (such as in the manufacturing of solar panels, and nitrile and latex gloves) and in some of our suppliers' supply chains. We work with our suppliers to understand their supply chains, what actions they have taken to address or remediate issues and confirm that their own governance policies and processes act to mitigate risks of modern slavery. Only as a last resort would we terminate a relationship with a supplier. We also work with industry and other stakeholders including government, as we seek to help mitigate the risk of modern slavery practices occurring in the supply chains of goods and services.



Assessing effectiveness

An effective response to modern slavery is one where our policies, processes and other actions identify the modern slavery risks in our supply chain including any emerging risks, where we mitigate those risks, and where we respond appropriately to any instances of modern slavery.

We acknowledge that the hidden nature of modern slavery can make it difficult to accurately determine the full impact of our actions and initiatives. We remain committed to continuous improvement in our approach to assessing the risks of modern slavery in our operations and supply chain.

Focus	Objective	Actions	2024 Output	Outcome
Risk identification, assessment and management	Identifying and managing modern slavery risks in EnergyAustralia's supply chain	 Monitoring supplier risk through media alerts and third-party risk services 	• Implemented the Trust Your Supplier platform to have a risk view for all suppliers	 Increased supply chain transparency
	Identifying and managing modern slavery risk in EnergyAustralia's operations	 Issuing and assessing self-assessment questionnaires to suppliers Maintaining our grievance and whistleblowing programs, review of half yearly engagement survey results and comments 	 464 questionnaires requested Grievance and whistleblowing programs maintained, review of engagement survey results and comments undertaken 	 Increased understanding of potential supply chain and operational risks Clarity of how seriously EnergyAustralia takes any conduct that is unlawful, improper or in breach of our policies and how to report and seek support



Engagement	Continuing engaging with our people, suppliers, customers, investors, regulators, industry, and civil society	•	Active participation in industry and civil society forums Information sharing with strategic suppliers and commercial and industrial customers about Modern Slavery risk	Attended briefings with, or met: Fair Supply; Walk Free Foundation; Attorney General's Department and United Nations Global Compact Australia. Met with peer organisations and suppliers regarding Modern Slavery	•	Building capacity and new industry norms Collaborative approach to modern slavery risk assessment, and mitigation and remediation activities where required
Education	Increasing awareness and understanding of modern slavery risks throughout EnergyAustralia Ensure that mandatory Code of Conduct Training is completed by staff and relevant contractors	•	Develop bespoke Modern Slavery learning module Monitor completion of training and ensure completion	 Face to face sessions delivered to Procurement. An online training module delivered in-house to be launched in 2025 97.1% of our employees completed their Core Compliance modules by the due date, across the company 	•	Awareness of modern slavery risks and obligations across our Operations and Supply Chain
Oversight	Embed ownership of modern slavery risk and processes in the Board and Executive Sustainability Committees	•	Modern slavery is a recurring agenda item	Ongoing	•	Senior oversight of modern slavery risk across operations and supply chain



Looking ahead

Our work to identify and mitigate modern slavery risks in our business is an ongoing process. Our efforts to date have set a strong foundation for continued improvement. Building on what we've learned so far, EnergyAustralia will continue to refine its approach with best practice advice.

Our priorities for 2025 are:

- Ensuring our People and Culture team maintain their current training and awareness of modern slavery risks and practices in our Operations.
- Introduction of Core Compliance Learning and linkage to Annual Incentive Program to reflect our emphasis and focus to do the right thing and operate legally, ethically and within the regulatory requirements set out by our industry.
- Centralised hazards, concerns and grievances case management into a single platform, Integrum, enabling a consolidated view for identifying themes and actions, and reporting to the Executive Leadership and Board subcommittees.
- Continue discussions about tier 2 suppliers with our strategic suppliers to understand Modern Slavery risk in our Supply Chain.
- Progress our work to align to the UN Guiding Principles.
- Establish a cross-functional working group to progress supplier audit activity.
- Ensuring our Procurement team maintains their current training and awareness of modern slavery risks and practices in our supply chain.
- Continuing collaboration with other organisations to share knowledge and improve processes.

Improvement initiative	Progress
culture is having simple and easy to find tools for reporting hazards, concerns and	Consolidated online case management and reporting commenced through a centralised platform in January 2025. In 2025, we will continue to refine reporting and insights, including analysing the channels our people use to speak up.

Against our priorities for 2024, we have made the following progress:



The launch of a Psychosocial Hazards Training Module in Q1 2024.	A new Health and Safety induction module covering both physical and psychosocial hazards will be launched Q1 2025.
Discuss tier 2 suppliers with our strategic suppliers to understand Modern Slavery risk in our Supply Chain.	2024 focus was our Battery Energy Storage Solution Projects and Solar PV suppliers. This work will continue in 2025.
Focus sessions on our EA Way behaviours which reinforce speaking up and taking action if you see something that's not right.	The Organisational Development team will conduct voluntary feedback sessions in Q1 2025 with participants from the 2024 Focus sessions.
Determine steps required to align to the UN Guiding Principles.	Meetings held with the United Nations Global Compact to understand requirements. Progressing our work to align to the UN Guiding Principles.
Implementation of our Supply Chain Risk Management framework, including consideration of an audit program.	Trust Your Supplier implementation complete. EnergyAustralia has met with audit companies to understand process, timeframes and approximate cost and is progressing next steps in 2025.
Continue working with suppliers who have not yet completed our Modern Slavery Survey.	Utilising Trust Your Supplier we are inviting all existing suppliers to register, which includes questionnaires about Modern Slavery. This work will continue through 2025.
Creation of an online Supply Chain focussed Modern Slavery training package, available to all staff.	An online training package was developed in 2024 and is available to all staff.
Continued improvements to our internal processes such as reviewing our supplier surveys and policies in line with best practice.	A supplier risk and onboarding platform, Trust Your Supplier, was implemented in 2024. EnergyAustralia's governance processes include at least two- yearly review of all policy and process documents.



Ensuring our Procurement teams maintain their current training and awareness of modern slavery risks and practices, both globally and within our business.	In 2024 EnergyAustralia completed training for the Procurement team.
Continuing collaboration with other organisations to share knowledge and improve processes, including how to tackle issues of modern slavery if identified.	EnergyAustralia has held discussion with multiple companies in 2024 regarding supplier risk, including modern slavery risk. We have also participated in forums and briefings on modern slavery with other Australian organisations. This will be continued in 2025.
Ensuring our People and Culture team maintain their current training and awareness of modern slavery risks and practices.	We continue to conduct training and awareness through regular policy reviews, face to face and online training, employment law forums and updates.
Introduced a linkage between annual core compliance training completion and Annual Incentive Payment eligibility.	Communication completed in December and effective 1 January 2025.

Consultation

All EnergyAustralia entities operate under a common set of governance policies. Work undertaken by our Procurement, People and Culture and Risk Assessment teams outlined in this Statement included engagement with our senior leadership and Executive Leadership Team and each reporting entity covered by the statement and the entities we own or control.

EnergyAustralia is aware of the limitations of buying power that we have as a company, and as part of an industry, with some large multinational or foreign government owned companies. We remain committed to working with industry bodies, Australian government agencies and bodies, and NGOs to be aware of specific and broader allegations of modern slavery and to work collectively in reducing modern slavery risk. To this point EnergyAustralia met with several customers, suppliers, other companies, government and NGOs during 2024 in order to share information, learn from each other, and increase understanding on modern slavery risks, actions, reporting frameworks, and strategies.



Approval

The Executive Leadership Team of the EnergyAustralia Group has also been involved in the review and endorsement of this Statement. This Statement was approved on 6 May 2025 by the board of EnergyAustralia Holdings Limited, the holding entity of the EnergyAustralia Group, after consultation with the Board Sustainability Committee.

Mark Collette Managing Director, EnergyAustralia

Jane McAloon Chair of the Board, EnergyAustralia



At EnergyAustralia, we recognise the Aboriginal and Torres Strait Islander peoples as the Traditional Owners of the land on which we operate and the communities we serve. Our goal is to build working relationships with Aboriginal and Torres Strait Islander peoples, communities and businesses. Through reconciliation we live our behaviours of being purposeful and making a difference.

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EnergyAustralia Whistleblowing information

You can submit a report in a number of ways:

- 1. In writing or verbally to Head of Group Internal Audit on (03) 9060-0000 at Level 19/697 Collins Street, Docklands, Victoria
- 2. Contacting the anonymous externally hosted channel 'Fair Call' via
 - Phone: 1800 500 965. This free call number is available 24 hours, 7 days a week.
 - Email: faircall@kpmg.com.au
 - Web: <u>http://faircall.kpmg.com.au</u>. Whistleblowers may complete and submit a form online. This method does not permit two-way communication unless the whistleblower provides contact details.
 - Post: FairCall Manager, PO Box H67, Australia Square 1213, Sydney
 - **Fax**: (02) 9335 7466