



Modern Slavery Statement

JUNE 2021



ENGIE



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.



CEO Message

2020 Modern Slavery Statement ENGIE Australia & New Zealand

I am pleased to present ENGIE Australia & New Zealand's (ENGIE ANZ) modern slavery statement for 2020. This is our first statement under the *Modern Slavery Act 2018* (Cth).

At ENGIE ANZ, the respect for others is one of the four principles embedded in our Ethics Charter. We are committed to respecting internationally recognised human rights wherever we operate, or our activities impact, around the world. This commitment is about doing business responsibly and sustainably. We focus on identifying and preventing the risks of negative impacts of our operations and activities on human rights; and the explicit rejection of modern slavery is central to this. At ENGIE ANZ, every employee is responsible for building and upholding these ethical human rights values.

In 2020, we worked hard to understand and address modern slavery risks in our operations and supply chains. Our approach focusses on building greater awareness of the risks of modern slavery practices within our workforce and supply chains (including by making it easier to report such risks) and

working closely together with our valued suppliers and business partners to eradicate such risks. We all have a role to play.

We will continue to work collaboratively and look forward to progressing our efforts in forthcoming years.

This modern slavery statement was approved by the board of directors of International Power (Australia) Holdings Pty Limited ABN 70 105 041 209 (**IPAH**) on 19 May 2021 and the board of directors of ENGIE Services Holdings Pty Limited ABN 18 615 894 794 (**ESH**) on 20 May 2021 as reflected on page 5.

Augustin Honorat
Chief Executive Officer
ENGIE Australia & New Zealand



Introduction

Reporting Entities and Controlled Entities

This modern slavery statement has been prepared by International Power (Australia) Holdings Pty Limited ABN 70 105 041 209 (**IPAH**) for the 2020 calendar year (**2020 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:

1. International Power (Australia) Holdings 2 Pty Limited ACN 105 041 307 (**IPAH2**);
2. International Power (Retail) Pty Limited ABN 18 107 548 854;
3. Simply Energy 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);
4. Pelican Point Power Limited ABN 11 086 411 814; and
5. ENGIE Services Holdings Pty Limited ABN 18 615 894 794 (**ESH**).

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 or controlled by the reporting entities, and the actions taken by those entities, to assess and address those risks, including the non-controlled entities as at the date of this statement. 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.

During the 2020 reporting year, IPAH2 disposed of 75% of its interests in the Willogoleche Wind Farm via the creation of an equity platform to further bolster its development of onshore wind and solar projects. The 75% interest in the equity platform was acquired by an investment fund under the management of the Infrastructure Capital Group (**ICG**), a specialist, independent infrastructure fund management firm. A controlled entity of IPAH2 remains as asset services manager of the Willogoleche Wind Farm.



Consultation Process

IPAH is ultimately owned by ENGIE S.A. (**ENGIE**) (72%) and Mitsui & Co., Ltd. (28%), 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 (excluding ESH and its controlled entities). ESH is ultimately owned by ENGIE (100%), and together with its controlled entities, is the **ESH Group**.

The IPAH Group and the ESH Group operate under common direction and governance with respect to their obligations under the MSA (**modern slavery obligations**). Each Group is subject to the same policies, procedures and processes concerning their modern slavery obligations, and accordingly, “act as one”. In this sense, 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 both Groups including human resources, procurement, finance, regulation, compliance and 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 co-chaired by the Head of Procurement and the Compliance and Sustainability Manager which met regularly throughout the 2020 reporting period. This approach ensured a consistent response across the Groups to their modern slavery obligations. Finally, the shared senior leadership team of the Groups with responsibility and accountability for modern slavery obligations reviewed and approved this modern slavery statement.

Approval of Modern Slavery Statement

This modern slavery statement was approved by the board of directors of International Power (Australia) Holdings Pty Limited ABN 70 105 041 209 (**IPAH**) on 19 May 2021 (including as a higher entity (as defined under the MSA) for IPAH2, International Power (Retail) Pty Limited, Simply Energy and Pelican Point Power Limited) and the board of directors of ENGIE Services Holdings Pty Limited ABN 18 615 894 794 (**ESH**) on 20 May 2021, and has been signed by Augustin Honorat, as a director and responsible member of those boards.



Our Structure, Operations and Supply Chains



IPAH Group and ESH Group

Structure

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

Operations

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.

IPAH Group

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

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 and Western Australia, including 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**) and the Wholesale Electricity Market in Western Australia (**WEM**) (via contractual arrangements with Synergen) and, additionally steam, to the BP Refinery in Western Australia. Some of the Group’s power stations also provide electricity support services to the NEM and transmission network service providers.

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, and which up until 27 October 2020, it fully owned. The IPAH Group now retains 25% ownership of the Willogoleche Wind Farm via a renewable equity platform for solar and wind energy investment with its partner, ICG. The Canunda and Willogoleche Wind Farms are operated by the Group, via contractual arrangements with third parties, while the latter is also managed by the Group. The wind farms also generate various “green products” such as renewable energy certificates.

IPAH Group and ESH Group

IPAH Group (continued)

Solar and Wind Farm Development

The IPAH Group is actively involved in the development of solar and wind farms and currently has three solar sites across Queensland (Gregory and Warhook) and New South Wales (Silverleaf) and one wind site in New South Wales (Hills of Gold) under various stages of development.

Energy Retailing – Simply Energy

The IPAH Group owns Simply Energy, a gas and electricity retailer and one of Australia's fastest growing energy companies with over 750,000 customers. Simply Energy is a reporting entity and its immediate parent, International Power (Retail) Pty Limited, is also a reporting entity. Simply Energy started providing energy in 2005, and today Simply Energy provides electricity to customers in New South Wales, Queensland, South Australia, Western Australia and Victoria, plus natural gas to customers in South Australia, Victoria and some areas of NSW. Simply Energy supports its customer base via billing service platforms, third party operated call centre operations located overseas (Philippines, South Africa and India) and Australia, and customer support staff (employed by ENGIE) located at head office in Melbourne, Australia.

Energy Solutions – Simply Energy Solutions

Simply Energy Solutions is a business model, supporting Simply Energy, 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 Simply Energy. Simply Energy Solutions is an employing entity.

Energy Management Services

The IPAH Group also provides energy management services via a dedicated energy management team. This team is responsible 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, hedging and risk management strategies. The team's activities include energy and renewable trading as well as derivative trading and other hedging practices.

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.

ESH Group

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

ENGIE Mechanical Services

The ENGIE Mechanical Services division of the ESH Group provides integrated solutions across mechanical systems, HVAC service and maintenance, and refrigeration service and maintenance, in Australia and New Zealand.

ENGIE Fire Protection Services

The ENGIE Fire Protection Services division of the ESH Group provides fire protection products and services as well as fire service and maintenance in Australia and New Zealand. This consists of providing our customers with reliable and affordable fire protection equipment and systems designed and engineered for their operations and regular testing, servicing, and maintenance of such fire equipment and systems to comply with current legislation, standards and building codes.

ENGIE Electrical & Communications Services

The ENGIE Electrical & Communications Services division of the ESH Group works with businesses across Australia and New Zealand to create innovative electrical and communications solutions. This consists of the provision of data network cabling, electrical solutions, data centre services, wireless networking infrastructure, security system installation, voice communication systems and cable assembly services. The services are diverse and cover, design, build and installation, commissioning, ongoing servicing, maintenance, extensions, upgrades, and management.

IPAH Group and ESH Group

ESH Group (continued)

ENGIE AV Technology Services

The ENGIE AV Technology Services of the ESH Group assists businesses to create sophisticated, efficient, and long-lasting audio visual, digital signage and control systems. This covers design, engineering, installation, and programming, hosting and management, testing and training and maintenance and emergency support services.

ENGIE Services Corporate

Similarly to the IPAH Group, the ESH 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 ESH Group also engage cleaning and security services in respect of their offices and other sites.

Supply Chains

ENGIE ANZ's diverse operations means a vast and expansive supply chain. In the 2020 reporting period, we spent over \$300 million across 3500 direct suppliers. This figure excludes spend incurred arising from our energy management activities to supply gas and electricity to homes, businesses, industrials, and other wholesale customers. This spend is managed separately from the general procurement spend by our energy management and retail business units and was approximately \$1 billion across all our operations for the 2020 reporting period.

General Procurement Spend

Almost all of ENGIE ANZ's annual spend for the 2020 reporting year occurred with suppliers located in Australia, although in the following categories of supply, our local suppliers provided their services using their overseas operations:

- call centre operations – Philippines, India and South Africa: 8% of total spend; and
- IT consulting services – India: 5% of total spend.

We know our spend also involved goods manufactured overseas, or goods produced in Australia using materials sourced overseas. The key high risk goods we identified are noted further below.

The key categories of supply by spend for the 2020 reporting year were: IT consulting services, call centre operations, uniform supply, electronic equipment supply and construction services (including operation and maintenance services).

Energy Management Spend

In the 2020 reporting period, our spend incurred 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 more than 60 external counterparties under various contracting arrangements including power purchase agreements, ISDA based derivative trading and various renewable purchase contracts.

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

For the 2020 reporting period, we undertook several steps to identify risks of modern slavery practices in our operations and supply chains. Our efforts focussed around identifying goods and services we procure which present an increased risk of exposure to modern slavery practices based around indicators which are well recognised around the world as impacting upon that risk level.

We looked at indicators such as:

The country or geographical location from which our goods and services are procured

We know that countries with weaker governance and law enforcement frameworks, inadequate labour conditions or protections for workers and a higher incidence of poverty, population displacement, conflict, political instability and migration flows tend to have a higher risk of exposure to modern slavery;

The categories of goods and services we procure

We know that certain goods and services are made in high risk countries or geographical locations, are commonly made using parts or services exploiting child labour or vulnerable workers or are highly susceptible to cost and time pressures escalating the risk of exposure to modern slavery;

The sectors or industries from which we procure our goods or services

We know that certain sectors or industries which are generally less regulated, lower paying, reliant on an unskilled workforce or a highly casualised, temporary, seasonal or outsourced workforce, or which are dependent

upon vulnerable workers such as migrants, tend to have a higher risk of exposure to modern slavery; and

Particular businesses or entities from whom we procure our goods or services

We know that certain businesses or entities are at a higher risk of exposure to modern slavery due to their history of human rights violations, poorly understood or enforced workers' rights and poorly managed or non-transparent procurement processes.

We used a range of supporting resources and tools to help us build this understanding. We used the Verisk Maplecroft Indices to determine the country or geographical location risk for modern slavery practices and human rights generally. We also used the Global Slavery Index¹, EcoVadis² data and information available on the Department of Home Affairs website³ to identify goods and services and sectors and industries associated with a higher risk of modern slavery. We then mapped this against our operations and supply chains and identified the following elevated risks of modern slavery.

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

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

3. <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>



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

CATEGORY OF SUPPLY	MODERN SLAVERY RISKS / INDICATORS
<p>Uniform Supply</p> <p>We source our employees' uniforms via suppliers in Australia. However, these uniforms are manufactured in high risk countries. The textiles and fashion industry is commonly accepted as being of higher risk for modern slavery practices. Further, we do not have any visibility over the manufacturing process or direct contractual leverage over manufacturers.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Forced / Bonded Labour • Deceptive Recruitment • Exploitation of Migrant / Vulnerable Workers • Child Labour • High Risk Country / Geographical Location
<p>Call Centre Operations</p> <p>We have several outsourced call centre operations in high risk countries including the Philippines, India and South Africa. Their location abroad also limits our ability for direct and frequent observation of their activities.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Forced / Bonded Labour • Deceptive Recruitment • Exploitation of Migrant / Vulnerable Workers • High Risk Country / Geographical Location
<p>Electronic Equipment Supply</p> <p>We purchase our laptops, computers, and mobile phones via suppliers in Australia but such equipment is typically manufactured in high risk countries. The manufacturing process also heavily relies on raw materials whose extraction and sourcing are usually from high risk countries. We do not have any visibility over the manufacturing process or direct contractual leverage over manufacturers.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Forced / Bonded Labour • Exploitation of Migrant / Vulnerable Workers • High Risk Country / Geographical Location
<p>Labour Hire Services</p> <p>We engage labour via labour hire firms and contractors who subcontract the services (or a part of the services) they provide to us to other businesses. Due to the need for highly specialised or technical labour, subcontracting arrangements also sometimes involve labour from high risk countries. We generally have less visibility and contractual leverage over subcontracting arrangements, although this typically rises as the materiality or value of the subcontract arrangement increases.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Forced / Bonded Labour • Exploitation of Migrant / Vulnerable Workers • High Risk Country / Geographical Location
<p>Construction Services</p> <p>Our involvement in the construction industry is usually in the development phase of our assets and our various operation and maintenance activities. The construction industry is well recognised as an industry exposed to higher risks of modern slavery.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Exploitation of Migrant / Vulnerable Workers
<p>Cleaning and Security Services</p> <p>We engage cleaners and security staff to clean and protect our office spaces and asset buildings. In leasehold scenarios, we have less control or visibility over cleaning or security arrangements as the lessors are responsible for providing the cleaning and security services as part of our leases. The cleaning and security industry is well recognised as an industry exposed to higher risks of modern slavery.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Forced / Bonded Labour • Exploitation of Migrant / Vulnerable Workers
<p>Renewables Industry</p> <p>The renewable industry is considered a high risk industry for modern slavery across the supply chain; from sourcing raw materials to the manufacture of renewable technologies and materials (e.g., batteries, wind turbines and solar panels). We do not have any visibility over the manufacturing process or direct contractual leverage over manufacturers of batteries or solar panels which are supplied to our customers. However, we do have direct contractual leverage with the providers of wind turbines for our developments.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Forced / Bonded Labour • Exploitation of Migrant / Vulnerable Workers • High Risk Country / Geographical Location
<p>Parts and Equipment Supply (electrical and fire)</p> <p>We source parts and equipment necessary for our fire and electrical businesses locally in Australia which have been manufactured in high risk countries. We do not have any visibility over the manufacturing process or direct contractual leverage over manufacturers.</p>	<ul style="list-style-type: none"> • Modern Slavery Risks / Indicators • Exploitation of Migrant / Vulnerable Workers • High Risk Country / Geographical Location
<p>COVID-19</p> <p>We understand the COVID-19 pandemic and associated lockdowns and other restrictive measures exacerbated modern slavery risks in supply chains globally. Such measures particularly impacted vulnerable workers such as migrants and women, and in some cases, have resulted in a permanent loss of work opportunities.</p>	

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

Our requirements for assessing and addressing risks of modern slavery practices in our operations and supply chains will evolve over time as we glean lessons from our initiatives. This is an ongoing, iterative process, and we will adapt and refine our approach to ensure we are responding most effectively to such risks, particularly when acquiring new goods or services, engaging new suppliers (especially suppliers from abroad) or venturing into new business ventures or developing new projects.

Internal Capability

For the 2020 reporting period, we focussed on developing our internal capability in identifying, assessing, and addressing risks of modern slavery practices in our operations and supply chains. This capability is of fundamental importance to ensuring an effective approach to minimising and/or mitigating such risks. This principally involved upskilling key personnel in our regulatory, compliance, procurement, finance, legal and human resources teams. We did this by attending numerous modern slavery webinars (run by external third parties), developing our compliance registers to ensure understanding of our legal requirements, and regular meetings between key personnel to develop our initial approaches.

We also focussed on broadening all our employees' knowledge about modern slavery generally by developing a dedicated intranet site. This site explains our commitment to eradicating modern slavery, including as part of our broader human rights commitments, defines what modern slavery is and its commonly accepted indicators, outlines the potential impacts of modern slavery illustrated by recent examples, and sets out our approach to compliance with the MSA. It is also supported by various resources including documents, websites, videos, and access to online training courses.

During the 2020 reporting period, we were constrained from undertaking face-to-face training and meetings due to COVID-19 restrictions. We intend to reignite these activities as restrictions ease. We also continue to investigate third party suppliers for various training options.

Policies and Procedures

We have an existing suite of policies and procedures that underpin our response to identifying, assessing, and addressing risks of modern slavery practices in our operations and supply chains. These policies and procedures apply globally (subject to local laws and regulations) and include our Human Rights Policy and Referential, Ethics Charter, the Vigilance Plan, our Supplier Code of Conduct and our Procurement Policy. These documents collectively ensure that we respect human rights wherever we operate or our activities impact. For the 2020 reporting period, we prepared a statement of areas of focus for the purposes of addressing our modern slavery obligations. We will do so again for each new reporting period.

Supplier Engagement

During the 2020 reporting period, we prioritised engagement with our top ten suppliers based on the key categories of supply by spend. We took this approach recognising that we have significantly more leverage (including contractual) over our direct supplier base with sizeable spend and close partner relationships. We also focussed, however, on three high risk suppliers based on the recognised modern slavery risk indicators: our uniform suppliers, our offshore call centre operators and our parts and equipment suppliers for our wholesale electrical and fire divisions. As our internal capability grows, we will advance this approach and cover significantly more of the suppliers with identified risks of modern slavery.

The key means for engaging with our targeted supplier base was via a self-assessment questionnaire (SAQ) which our targeted suppliers were asked to complete to evaluate the strength of their own systems and processes to manage the risk of modern slavery practices in their operations and supply chains. We also asked all new suppliers and major tenderers (determined based on the risk indicators and our assessments) to complete the SAQ as part of our onboarding screening and tender processes. For the 2020 reporting period, we adopted the SAQ developed by a range of industry participants in Western

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

Supplier Engagement *(continued)*

Australia as a means of streamlining reporting (including for our suppliers) and bringing consistency in understanding outcomes across our uniform supply chains.

As our targeted suppliers returned their SAQs, our procurement team (with input from other areas of the business where necessary) assessed the results. We also engaged the services of EcoVadis to conduct independent assessments of our targeted suppliers. As we move forward, we will delve deeper into the outcomes of the assessments and seek to address any gaps with our targeted suppliers. We will adopt a range of measures based on the identified gaps and suggested improvement plans from EcoVadis. Such measures may include training on modern slavery, training on ENGIE's supplier expectations, site visits and further audits. Some of these measures are already part of our business processes but have been curbed due to COVID-19 restrictions (e.g., travelling abroad for site visits). Again, we will re-establish these initiatives once restrictions permit. The key challenge for us, however, remains to sufficiently engage our suppliers to respond to our initiatives.

Contracting

During the 2020 reporting period, we introduced modern slavery clauses in our standard form contracts. The bulk of our key suppliers are on these terms and conditions. We have a preference to engage suppliers on our standard form contracts, but in instances where we cannot, we aim to ensure our suppliers' terms and conditions are aligned with, and not inconsistent with, our own expectations regarding modern slavery, and more generally human rights. We also follow this approach with bespoke negotiated contracts. We continue to monitor best practice in this area and will revise our modern slavery clauses to mirror developments. Going forward, we aim to review and audit key suppliers to understand the level of compliance with these provisions, which activities were limited due to personnel unavailability (including from suppliers) during the 2020 reporting period due to COVID-19 restrictions.

Whistleblowing

ENGIE has a well-established whistleblowing framework which was most recently further developed with the introduction of a localised whistleblowing platform. We see this avenue as critical for managing risks of modern slavery practices in our operations and supply chains. Disclosure of modern slavery can lead to improvements in our processes for addressing such risks and ultimately successful investigations and remedies for victims.

Access to the platform is principally via our website or mobile app but whistleblowing reports can also be made via a hotline or by email. We also produced and distributed posters in 2020 to our call centre operators, one of our key category of suppliers identified as high risk, to communicate the availability and increase the visibility of our whistleblowing framework. In the future, we aim to expand the emphasis on our communication channels to ensure our supply chain is aware of the availability of our whistleblowing framework to report modern slavery concerns, particularly given some of their offshore locations.



Effectiveness of Our Actions

The following table sets out the categories of activities we have in place to identify, assess, and address risks of modern slavery practices in our 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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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 requirements and plan for reporting period.	<ul style="list-style-type: none"> number of policies and procedures reviewed in line with legislative and ENGIE requirements and plan for reporting period
4	Training	Training opportunities for employees on ethical sourcing and modern slavery.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> % 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	<ul style="list-style-type: none"> determination of key suppliers based on spend determination of categories of supply with high risk indicators
8	Supplier Engagement	Supplier engagement initiatives.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> % 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 (SAQs)	self-assessment questionnaires sent to targeted suppliers continual review of SAQ in line with plan for reporting period	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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).	<ul style="list-style-type: none"> number of site visits of outsourced functions
14	Victim Remedies	Supplier remedies for victims.	<ul style="list-style-type: none"> number of victims provided with a remedy from the supplier

Future Actions

Our priority areas to address in forthcoming reporting periods are:

1. Further refining, strengthening and embedding our supplier due diligence and onboarding procedures across our business
2. Working closely with our targeted suppliers to improve their modern slavery risk assessments and ensuring alignment with our own expectations and requirements
3. Engaging an internal resource to monitor and audit our call centre operations in the Philippines to ensure that our expectations and requirements regarding modern slavery are being adhered to
4. Recognising supplier efforts to ensure awareness of modern slavery requirements and risks in their own operations and supply chains, via our Supplier Awards Programme
5. Investigating further training opportunities for our employees and key suppliers



Appendix A – Controlled Entities

The tables below list the controlled entities of the IPAH Group and the ESH Group. The tables also highlight the structure of each reporting entity (highlighted rows) within these Groups. In total, the IPAH Group employs approximately 400 people, while the ESH Group employs approximately 1,100 people.

IPAH Group

ENTITY	ABN / ACN	LEGAL CLASSIFICATION	EMPLOYEES	CONTROLLED ENTITIES
Canunda Power Holdings Pty Limited	ACN 107 045 518			
Canunda Power Pty Ltd	ABN 31 103 087 341			
GDFSM Finance Pty Limited	ABN 87 169 616 219			
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 (IPAH2)	ACN 105 041 307	Proprietary limited company incorporated in Australia	0	IPAH Group (excluding IPAH)
International Power (Australia) Holdings Pty Limited (IPAH)	ABN 70 105 041 209	Proprietary limited company incorporated in Australia	0	IPAH Group
International Power (Australia) Pty Ltd	ABN 59 092 560 793			
International Power (Energy) Pty Ltd	ABN 53 062 798 510			
International Power (Retail) Pty Limited	ABN 18 107 548 854	Proprietary limited company incorporated in Australia	0	Simply Energy Simply Energy Solutions Pty Ltd IP (Australia) Energy Ventures Pty Limited
International Power Wind Holdings Pty Ltd	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	32	None
Perth Power Partnership (a partnership comprising Kwinana Power Partnership and RATCH-Australia Energy (Kwinana) Pte Ltd) ¹	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			
Simply Energy (a partnership comprising IPower Pty Ltd and IPower 2 Pty Ltd)	ABN 67 269 241 237	Unincorporated Partnership	119	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			

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

Appendix A – Controlled Entities (continued)

ESH Group

ENTITY	ABN / ACN	LEGAL CLASSIFICATION	EMPLOYEES	CONTROLLED ENTITIES
AV Centric Pty Ltd	ABN 25 163 267 981			
ENGIE AV Technologies Pty Limited	ABN 61 007 012 544			
ENGIE Data Centre Services Pty Limited	ABN 91 163 500 267			
ENGIE Electrical & Communications Pty Limited	ABN 51 007 066 855			
ENGIE Fire Protection Pty Limited	ABN 83 160 366 352			
ENGIE Mechanical Services (Qld) Pty Limited	ABN 16 160 366 067			
ENGIE Mechanical Services (WA) Pty Limited	ABN 53 108 035 730			
ENGIE Mechanical Services Australia Pty Limited	ABN 66 160 365 471			
ENGIE Services Australia Pty Limited	ABN 32 002 141 068			
ENGIE Services Corporate Pty Limited	ABN 96 160 362 792			
ENGIE Services Holdings Pty Limited	ABN 18 615 894 794	Proprietary limited company incorporated in Australia	None	ESH Group
ENGIE Services New Zealand Holdings Pty Limited	ABN 44 160 364 125			
ENGIE Services New Zealand Limited	Registration No. 4020058			

Appendix B – Non-Controlled Entities

The table below sets out the entities directly owned but not controlled by IPAH2 and indirectly owned by not controlled by IPAH. As at 27 October 2020, IPAH2 directly owns 25% of these entities, while IPAH indirectly owns 25% by virtue of its 100% ownership of IPAH2.

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 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			



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