

Modern Slavery Statement – Financial Year Ending 30 June 2022



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1. Message from the Managing Director - Executive Summary

GloBird Energy Pty Ltd (GloBird) is a next-gen, budget-friendly energy retailer. GloBird is based in Melbourne, giving Aussies the power to choose better value energy. We're proud and humbled for the multiple award wins under our belt. Winning the Canstar award for the most satisfied customers for dual fuel nationally in 2022, and triple (Canstar Blue awards wins 2021 – Vic, NSW and SA) (Mozo awards 2017, 2018, 2019, 2020, 2021 & 2022) for our bill-busting value rates in Victoria and interstate.

At GloBird we believe in a fair, equitable approach and this is reflected in our customer service standards, the people we employ and the external suppliers we work with. We have a responsibility to address modern slavery risks in our operations and supply chain.

GloBird employ over 80 Melbourne based staff and turnover more than \$100M annually. We offer a range of cost-effective pricing options and innovative products. GloBird's mission is to support the logical transition from traditional energy to sustainable, affordable, reliable energy.

Our team work mostly from our Melbourne office. This includes sales, customer service, operations, IT, billing, HR, and the senior management, for this reason we assess operations and the supply chain as a whole.

For its suppliers, GloBird has assessed the risk of modern slavery on a macro level by looking at the industry, location and the regulatory environment that overarches the industry. Our assessment has not identified any high, medium, or low risk suppliers. When engaging suppliers, we review their response to identifying and managing modern slavery risks.

However, GloBird regularly review the supply chain and its suppliers to review industry-relevant developments and best practices and take the necessary steps to ensure compliance with the Modern Slavery legislation.

Working together with our people, suppliers, and the industry, we are dedicated to ensuring safe, fair, and supportive conditions in every part of our operations in our business. We will continue to assess best practice in mitigating modern slavery risks as appropriate.

This statement was developed through the collaboration and assistance of the leadership team across the business.

2. Our Commitment

GloBird provides this Modern Slavery Statement (Statement) as required under the Modern Slavery Act 2018 (Cth) for the financial reporting period from 1 July 2021 to 30 June 2022.

The term Modern Slavery is defined in the Modern Slavery Act 2018 (Cth) to include the following eight specific types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage.
- Forced labour.
- Debt bondage
- Deceptive recruiting for labour or services
- The worst forms of child labour.

Reference to modern slavery in this Statement is aligned with the principles set out in the Global Survey Index 2018, and carries the meaning given to it in the Criminal Code Act 1995 (Cth). Modern slavery captures several slavery and slavery-like practices under one common term and includes, but is not limited to, instances of exploitation that a person cannot refuse or depart from because of threats, violence, coercion, deception, or abuse of power.

GloBird is committed to:

- Operating its business in accordance with the Modern Slavery Act 2018 (Cth), including all emerging amendments to this legislation
- Ensuring our people understand modern slavery and the risk it presents to our operations.
- Providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients
- Mitigating modern slavery risk within our operations
- Eliminating potential and/or actual modern slavery practices from our operations and supply chain.

3. Overview of Our Business

GloBird is a privately owned energy retailer based in Melbourne, Australia since 2014.

We have been a retail market participant in the National Electricity Market (NEM) since 2015.

GloBird Energy sell electricity and gas mainly to residential customers; however, also sell to a select group of small to medium sized businesses (SME). GloBird carry on retail services in Victoria, New south Wales, South Australia, and Queensland.



We do not own, operate, or maintain physical gas or electricity transmission, distribution or storage assets or any other physical plant or equipment related to such activity. GloBird differentiates itself in the market by providing good customer service and very competitive energy offers.

Our head office location and contact details are listed below:

GloBird Energy Pty Ltd – ABN 68 600 285 827
85 Maroondah Hwy, Ringwood, VIC 3134
Telephone: 133 456
Facsimile: 03 8560 4197
Enquiries: cs@globirdenergy.com.au
Website: www.globirdenergy.com.au

4. Our Reporting Entities

In accordance with the Modern Slavery Act 2018 (Cth), all entities with a consolidated revenue of more than \$100 million within a given financial period must submit a Modern Slavery Statement.

As of 30 June 2022, GloBird Energy Pty Ltd is the sole reporting entity.

The delivery of the Modern Slavery Statement is a collective effort, considering the collated data and corresponding analysis of our reporting entity and its controlled entities.

5. Our Governance

GloBird is committed to employing corporate governance practices that support our compliance by adhering to applicable standards and legislative instruments, while also aligning with community expectations. To achieve this end, the GloBird Board (the Board) plays the principal role in the direction of corporate governance. Board responsibilities include governing, guiding, and directing the firm towards the satisfaction of company objectives, in the interests of our employees, our shareholders and the community. The Board is accountable for ensuring the appropriate management of modern slavery risk, by providing appropriate governance and direction to the Executive Leadership Team.

The Executive Leadership Team has implemented a process to regularly review and assess the effectiveness of our policies, codes, standards, and procedures as part of our Risk Management Framework. The Executive Leadership Team has established a Risk Management Committee which is responsible for overseeing the effectiveness of our risk management systems, namely:

- Financial
- Legal and regulatory
- Internal controls
- System and procedures for compliance
- Safety risks across the organisation.

GloBird Energy is committed to high standards of corporate governance and operates under a common set of governance policies and procedures, including a Modern Slavery Policy. GloBird has defined roles, responsibilities, and accountabilities for the management of modern slavery related risks throughout the organisation.

The Executive Leadership Team and the Risk Management Committee have been consulted in relation to this Statement and GloBird's Modern Slavery Policy. The statement is compulsory across GloBird and all the entities GloBird own or control.

6. Our Operations

GloBird is a relatively small organisation with approximately 80 employees. Our employees are on full time, part time or casual employment contracts. Our employment contracts and practices are regularly reviewed to ensure compliance with workplace laws, including the Fair Work Act 2009 (Cth) and National Employment Standards.

In GloBird, all forms of modern slavery and related behaviour are not acceptable and not permitted. Our Code of Conduct outlines our corporate values and ethical principles and sets out the behaviours expected of all employees, contractors, and suppliers, including references to risks of Modern Slavery.

Currently we retail to approximately 100,000 energy customers with a turnover more than \$100 million annually.

GloBird deals with external supply chains which support our operations. These include energy wholesale and distribution services, professional marketing services, IT solutions and hardware services, professional consulting and legal services, professional auditors, and the management of our office. Our major supply chains are in Australia and are required to abide by the Modern Slavery Act.

7. Modern Slavery Risk Areas

GloBird's modern slavery risk can be broadly classified into three distinct areas:

- Our suppliers
- Our clients
- Our people

We attribute a risk level to each of these areas based on the inherent risk exposure each presents to the firm, guiding our response to modern slavery.

7.1 Our Suppliers

GloBird has eight main suppliers who takes up 90% of our direct costs. Based on our review of the Modern Slavery Register, each one of them have a Modern Slavery Statement.

We have classified the risk of modern slavery in relation to our suppliers as low.

7.2 Our Clients

The majority of GloBird's customer base comprises 97% residential clients from Victoria, New South Wales, South Australia, and Queensland. The remaining 3% of customers consist of small and medium-sized enterprises (SMEs) mainly based in Victoria. GloBird has increased marketing to small business and expect the number of SMEs to grow.

We have classified the risk of modern slavery in relation to our clients as low.

7.3 Our People

GloBird is a relatively small organisation with approximately 80 employees. Our employees are mostly on full time or part time contracts. We also have a small number of employees on casual employment contracts. Most of our employees are Australian citizens or have permanent residents of Australia. Only a small number of our employees have temporary visas. Our employment contracts and practices are regularly reviewed to ensure compliance with workplace laws, including the Fair Work Act 2009 (Cth) and National Employment Standards.

We have classified the risk of modern slavery in relation to our people as low.

8. Our Modern Slavery Due Diligence

GloBird is committed to managing the risk of modern slavery within our operations. GloBird is currently developing our internal Modern Slavery Framework which sets out the key elements required to effectively manage modern slavery risks. The framework will be set up to ensure we track our performance and meet the overall objectives as outlined in the table below.

Corporate Governance	<ul style="list-style-type: none"> • Governance • Policies
Risk Management	<ul style="list-style-type: none"> • Risk Identification Process • Managing Modern Slavery Risks
Raising Concerns	<ul style="list-style-type: none"> • Grievances and Whistleblowing Program
Review & Remediation	<ul style="list-style-type: none"> • Remediation Processes and Reviewing the Effectiveness
Monitoring & Reporting	<ul style="list-style-type: none"> • Tracking and Reporting
Awareness, Education & Training	<ul style="list-style-type: none"> • Training

8.1 Corporate Governance

8.1.1 Policies

GloBird has established policies that articulate commitments to ethical behaviour, these policies include the prevention of modern slavery in our operations. Our Code of Conduct outlines our corporate values and ethical principles and sets out the behaviours expected of all employees, contractors, and suppliers. Our policies and procedures are reviewed and revised regularly to assess their effectiveness.

8.2 Risk Management

8.2.1 Risk Identification Process

GloBird’s risk mitigation plan is based on recognising recurring risks, prioritizing risk mitigation and monitoring. We have five general steps in our mitigation plan.

1. Identify the risk - Our risk mitigation strategy considers not only the priorities and protection of our customers and staff, but any risks that might arise due to the nature of the field.

2. Perform a risk assessment (analyse the risk)- Involves quantifying the level of risk in the events identified. Using GloBird’s Risk Matrix, consider the likelihood and consequences of a risk event occurring and then use this analysis to determine a risk rating. Risk assessments involve measures, processes, and controls to reduce the impact of risk.

3. Prioritize risk (evaluate the risk) - Involves ranking quantified risk in terms of severity.

4. Treat the risk - Involves monitoring risks as they change in severity. Implement appropriate control measures to eliminate, or at least minimise these risks to an acceptable level.

5. Monitor and review - Involves reevaluating the plan's effectiveness in identifying risk and improving as needed. Regular testing and analysis occur to make sure the plan is up to date and functioning well.



GloBird’s risk mitigation handling options include:

- **Assume/Accept** - We acknowledge the existence of a particular risk and make a deliberate decision to accept it without engaging in special efforts to control it.
- **Avoid** - we adjust program requirements or constraints to eliminate or reduce the risk. This adjustment could be accommodated by a change in funding, schedule, or technical requirements.
- **Control** - We implement actions to minimize the impact or likelihood of the risk.
- **Transfer** - We reassign organizational accountability, responsibility, and authority to another stakeholder willing to accept the risk.
- **Watch/Monitor** - We monitor the environment for changes that affect the nature and/or the impact of the risk.

9. Managing Modern Slavery Risks

GloBird understands that multiply risk factors could cause or contribute to modern slavery practices in our operation and supply chain. We use the following methodology to manage modern slavery risks.

Identify the Risk	GloBird will assess modern slavery risks for our operations and supply chain
Analyse and evaluate	Prioritise and quantify the modern slavery risk
Acting	Taking appropriate actions to address the modern slavery risk and practices
Review and Monitor	Review and monitor the effectiveness of our actions

GloBird Energy will also rely on the following for the management of its business and its responsibilities for managing modern slavery risks: These are:

- GloBird's Code of Conduct
- The Risk Management Committee
- Compliance Management

As part of our Code of conduct, GloBird's requires that all of our team members conduct themselves according to the highest standards of ethics, integrity, and behaviour. Our Code has standards of behaviours that must be met by all. Where these standards are not met, appropriate disciplinary actions are taken.

GloBird's Risk Management Framework requires that potential and identified risks are managed and mitigated. In order to manage these risks, the Risk Management Committee will ensure the risks associated with modern slavery are being appropriately managed and ensuring where necessary, additional improvements are incorporated into processes and procedures within the organisation.

GloBird's Compliance Management Committee works with the Risk Management Committee who is responsible in managing modern slavery risks. They are responsible for ensuring that any necessary improvements identified from the risk assessments are managed appropriately.

We have assessed modern slavery risks in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing, or directly linked to modern slavery practices and no modern slavery risk were identified in this reporting period.

9.1 Raising Concerns

GloBird has an internal People and Culture department where employees can raise concerns and grievances relating to modern slavery. Under our Code of Conduct, employees and contractors are encouraged to report concerns relating to observed behaviours or where there is a reasonable suspicion of a breach of the Code of Conduct, to their immediate leader, a manager or a member of the People and Culture team.

Grievance Management: Any employees can raise a grievance and have it addressed in a professional caring way in line with our code of conduct.

Whistleblowing management: Employees have access to internal and external parties that encourage people to raise concerns and have them investigated accordingly.

A register is kept by the People and Culture team to record any breaches of our policy. No modern slavery breaches have been identified in this reporting period.

We acknowledge that while no risks were identified and found, this does not guarantee that instances of modern slavery cannot occur. As such, we will continually monitor risks and review our internal policies and practices to ensure ongoing compliance.

9.2 Review & Remediation

GloBird will take appropriate steps to remediate any instances of modern slavery identified and if identified to prevent them from occurring according to applicable legislation.

We will treat the disclosure sensitively and seriously and will deal with it fairly and objectively. Any investigation will be conducted in a timely manner and will be fair and independent from any persons to whom the disclosure relates. Investigations will generally be overseen by the Executive Managers and the Risk Management Committee.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to build upon.

9.3 Monitoring & Reporting

GloBird will establish a tracking and reporting mechanism to address Modern Slavery risk management that:

- Supports continuous improvement in our approach to Modern Slavery
- Assess the effectiveness of our actions; and
- Manage our reporting obligations under the Act.

GloBird's Compliance Management Team will be responsible for tracking and managing our reporting obligations.

9.4 Awareness, Education & Training

As part of our framework of actions to comply with the Act, we are developing modern slavery awareness and education modules. We cover the below:

- Background to the Modern Slavery Act,
- What constitutes modern slavery and the forms it can take,
- How modern slavery practices can impact our employee, suppliers, and overall, our supply chain.
- What to do if slavery or human trafficking is suspected or detected?
- Examples of modern slavery,

The module will be incorporated into our induction program for new employees and training will be provided to all our existing employees.

People and Culture are responsible for keeping all modern slavery training documents up to date, ensuring the staff and suppliers are provided continuous training and training attendance records are kept.

10. Assessing The Effectiveness: Modern Slavery Risk Management Framework

At GloBird, we are committed to the continuous improvement of our modern slavery risk management framework. By adding further rigour to this framework, we can continue to mitigate modern slavery-related risk where it concerns our suppliers, our clients, and our people. We collate data insights from our various due diligence undertakings, in order to better evaluate the effectiveness of our existing framework.

11. Approvals and Signature

This statement was approved by the Board of the applicable reporting entity, GloBird Energy Pty Ltd, on 20th of June 2023.



Mr. John McCluskey
Director: GloBird Energy Pty Ltd
20th of June 2023