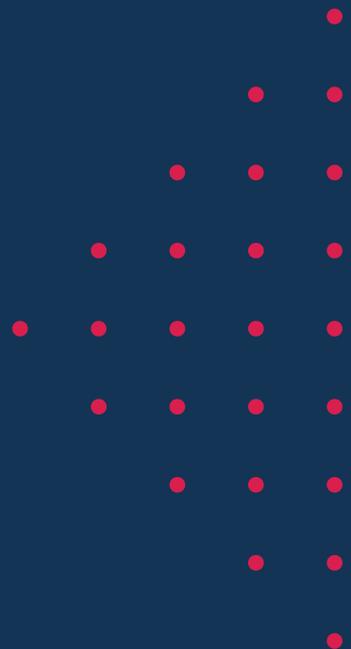




Modern Slavery Statement

Financial Year 2025



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About This Statement

This Modern Slavery Statement (**Statement**) is made in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) and submitted as a joint statement on behalf of the reporting entities outlined in Appendix B (collectively the **Energy Locals Reporting Entities**). The Statement applies to, and outlines the steps taken, by the Energy Locals Reporting Entities and their related entities (collectively, the **Energy Locals Group**) for the period of 1 July 2024 to 30 June 2025 (**Reporting Period**), to assess and address modern slavery risks in their operations and supply chains. References to “we”, “us” or “our” in this Statement refers to the Energy Locals Group, unless stated otherwise.

A Note from Our CEO

I am pleased to share the Energy Locals Group's Modern Slavery Statement for Financial Year 2025.

The Energy Locals Group is committed to operating with the highest standards of integrity, respect, and accountability at all times.

We acknowledge our obligation to play an active role in preventing modern slavery across both our operations and supply chains. Our organisation remains committed to practices that respect and protect the dignity of all individuals, and we are continually strengthening our approach to identifying, managing, and reducing modern slavery risks.

This Modern Slavery Statement sets out the actions we have taken in financial year 2025 and our ongoing efforts to ensure our operations and supply chains remain free from exploitation.



Adrian Merrick

Chief Executive Officer

Energy Trade Pty Ltd

Dated: 19 December 2025

Our Structure, Operations and Supply Chain

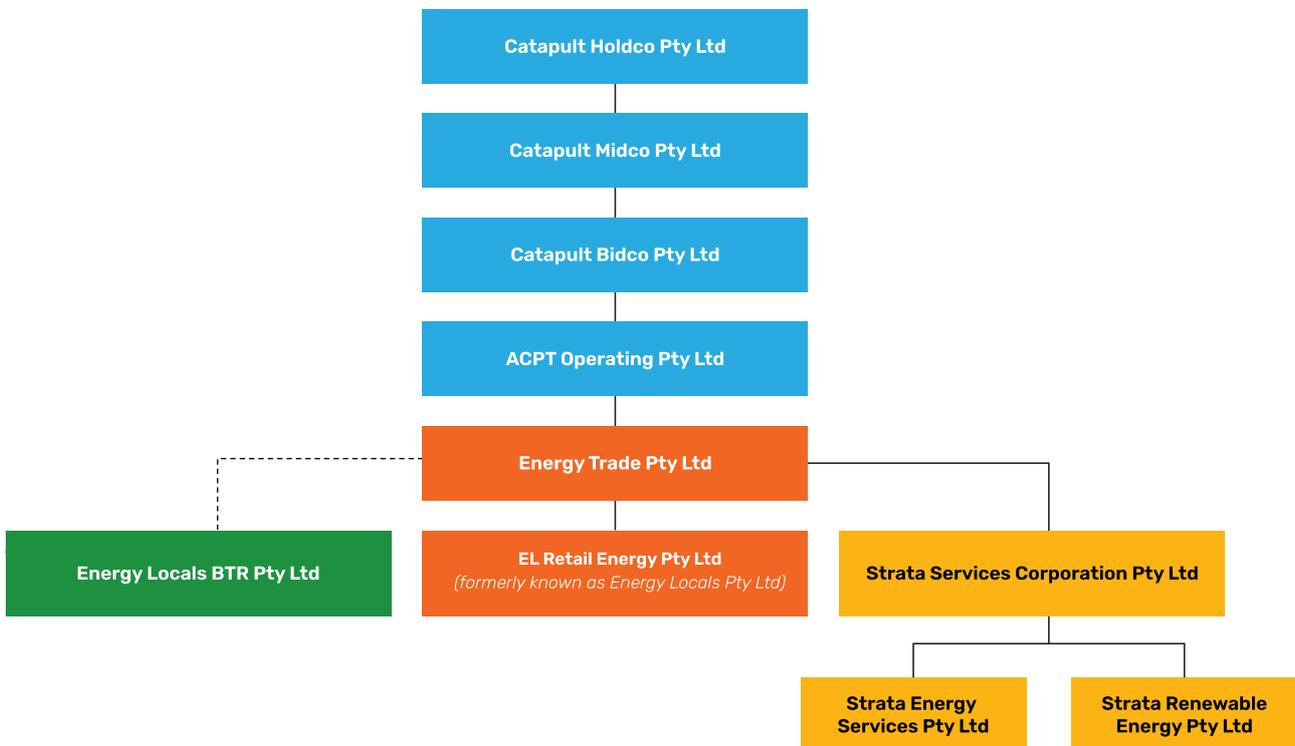
1. Who Are We?

a. Overview of the Energy Locals Group Structure

The Energy Locals Group is proudly 100% based and operated in Australia.

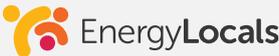
The Energy Locals Group is backed by a consortium led by Palisade Impact - a leading impact investor that provides dedicated funding to charitable projects, advocacy initiatives, and the growth of organisations driving social and environmental change. The Australian government-backed Clean Energy Finance Corporation is a member of the consortium.

Within the Energy Locals Group structure (as depicted below as at 30 June 2025) the key operations predominantly sit within two key groups (as indicated in orange in the below structure), each specialising in different aspects of the industry.





The service offerings are detailed further below.

Overview of our services	
	<p>Energy Trade Pty Ltd (ACN 165 688 568) trading as Energy Locals Urban is an embedded network services provider specialising in energy procurement and management, energy generation and the provision of energy efficient technologies for residential, commercial, and industrial projects.</p> <p>Energy Locals Urban has extensive expertise in the management and implementation of embedded networks, which include electricity, gas, hot water, solar PV, electric vehicle charging, battery storage and telecommunications.</p> <p>We offer smart, clean energy for new developments and work with developers to install solar panels, energy storage batteries, smart meters, centralised hot water and other smart energy solutions.</p> <p>We also install solar panels and storage solutions on existing properties to give customers access to renewable power.</p> <p>Energy Locals BTR Pty Ltd is a subsidiary of Energy Trade Pty Ltd, focused on providing the same specialist embedded network services to build to rent operators specifically.</p>
	<p><i>Note: that EL Retail Energy Pty Ltd is no longer a part of the Energy Locals Group, however, it was during the Reporting Period.</i></p> <p>EL Retail Energy Pty Ltd, formerly known as Energy Locals Pty Ltd, (ACN 606 408 879) (Energy Locals) is an energy retailer.</p> <p>Energy Locals has been a licenced electricity retailer since 2016, launching initially to customers in New South Wales and south-east Queensland in January 2017.</p> <p>Since then, we have expanded to cover all remaining states and territories across the National Energy Market, in Victoria, South Australia, ACT & Tasmania, for both residential and small-medium business customers. We are also licensed to sell gas and hold an Australian Financial Services License.</p>
	<p><i>Note: that the Strata Energy Services group is no longer a part of the Energy Locals Group, however, it was during the Reporting Period.</i></p> <p>During the Reporting Period, the Strata Energy Services group, made up of Strata Services Corporation Pty Ltd (ACN 622 568 718), Strata Energy Services Pty Ltd (ACN 622 570 156) and Strata Renewable Energy Pty Ltd (ACN 637 530 235), focused on the specific energy requirements of multi-unit residential communities. Their services encompassed energy audits, consumption analysis, and the implementation of energy-saving initiatives.</p>



2. Operations

Proudly Australian based, the Energy Locals Group employed approximately 130 full time equivalent staff at the end of the Reporting Period.

Most of our workforce are engaged directly via employment contracts on a permanent, fixed/maximum term or casual basis. Our employment contracts and workplace policies are regularly reviewed to ensure compliance with workplace laws, including the *Fair Work Act 2009* (Cth), National Employment Standards and applicable industry awards.

3. Supply Chain

As an energy retailer and embedded network service provider our supply chain largely comprises of the procurement of commodities and energy for resale, the procurement of energy management equipment and professional services and business support.





A further description of these categories is set out below:

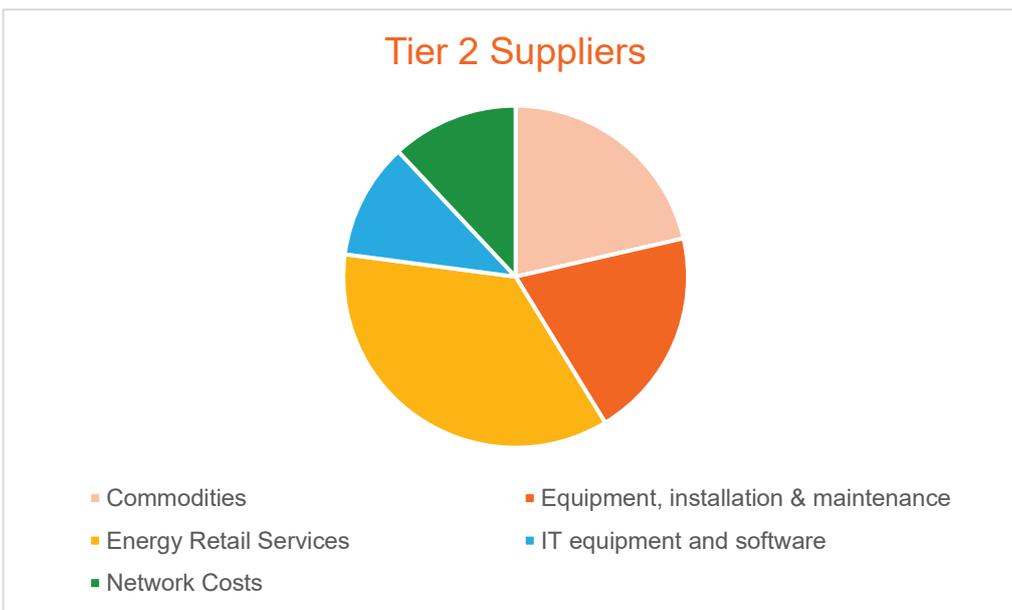
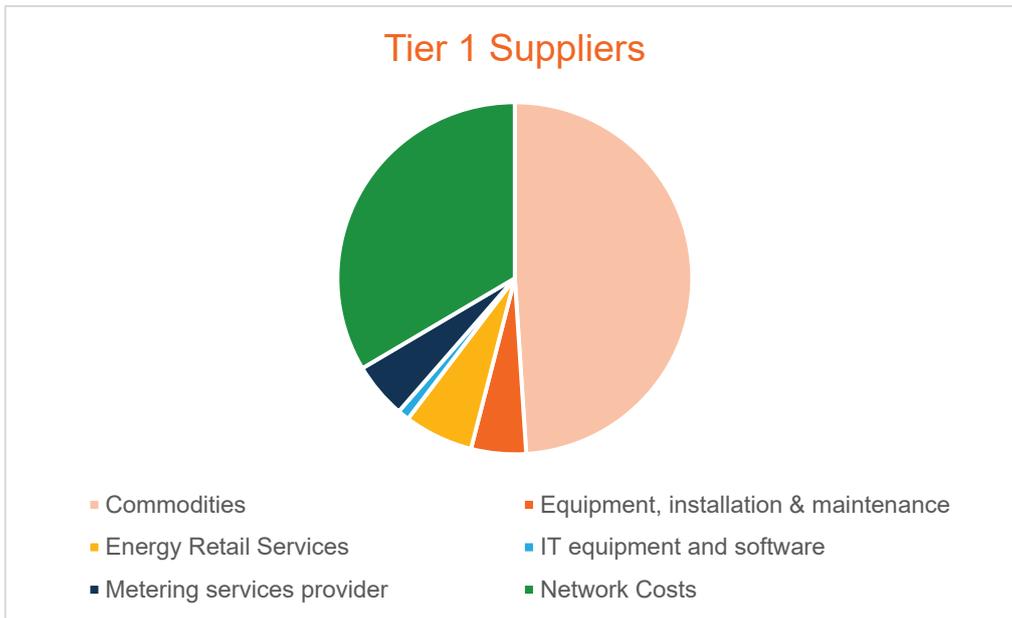
<p>Commodities / Energy for resale</p> 	<p>Wholesale electricity and gas.</p>
<p>Business Services</p> 	<p>Services required for the operation of the business including logistics and warehousing services.</p>
<p>Energy Retail Services</p> 	<p>Services required to operate an energy retail business including retail customer services. This includes:</p> <ul style="list-style-type: none"> • Metering services • Billing services • Debt collection services • Bill printing and issuing • Call centre software to manage workflow and customer accounts
<p>Energy Generation</p> 	<p>Products and materials, e.g:</p> <ul style="list-style-type: none"> • Solar PV systems • Electric vehicle chargers
<p>Professional Services</p> 	<p>Specialised services provided by experts in fields such as:</p> <ul style="list-style-type: none"> • Law, accounting, information technology, marketing, human resources, and consulting.
<p>Equipment, Installation & Maintenance</p> 	<p>Installation and maintenance of components and finished goods required for establishment and operation of embedded networks (such as Solar PV systems, battery energy storage systems, Electric Vehicle chargers and hot water systems).</p>

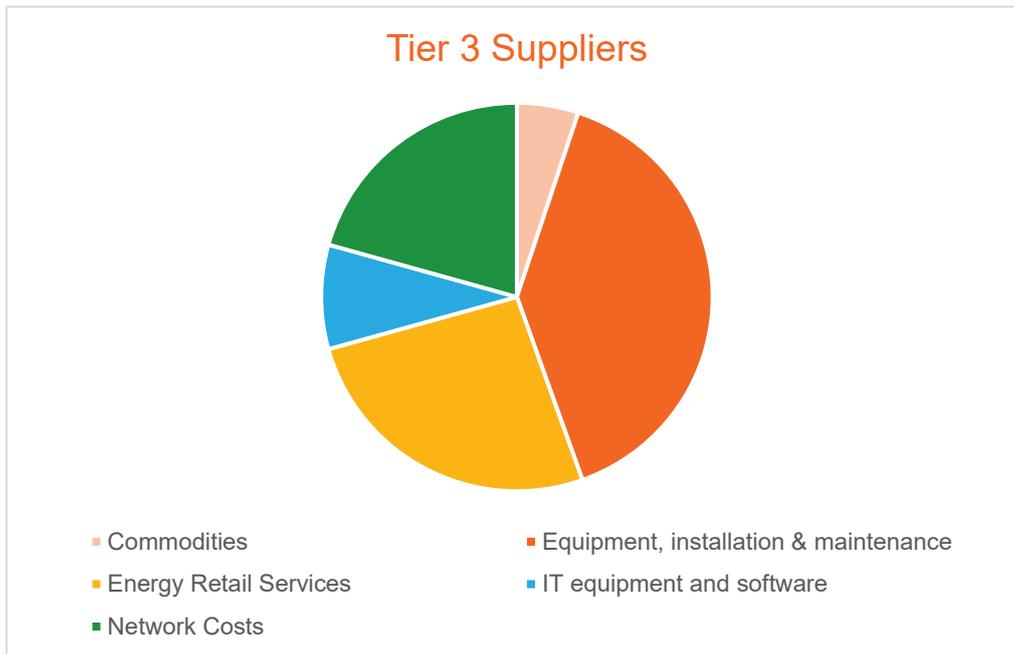
To better understand our supply chain and key suppliers, and to track new trends each year, we have categorised our suppliers for Energy Locals Retail and Energy Locals Urban by type and annual spend.

The breakdown of all suppliers with an associated annual spend of over \$500,000 (**Tier 1 Suppliers**), \$200,001 to \$500,000 (**Tier 2 Suppliers**) and \$100,000 to \$200,000 (**Tier 3 Suppliers**) is set out by percentage and category below.

For the purposes of categorising these suppliers, we have grouped business services, professional services and consultancy under energy retail services. IT suppliers and metering providers have been separated as we noted these to be key supply components in our energy retail operations.

We have also separated network costs as this represents a key trend in our costs and operations.





As evidenced by these pie-charts, and consistent with previous years, our most significant supplier group is in relation to procurement of wholesale energy and gas, which includes distribution costs and the purchase of environmental certificates as required by law. Our Tier 1 suppliers represent more than 90% of our total annual spend.

While our energy suppliers are diverse, all are Australian based. By selecting Australian-based suppliers, we minimise the risk of modern slavery within our supply chain.

As the majority of our suppliers are in connection with the generation and distribution of energy in Australia, we consider it most effective to focus our more detailed supplier assessment on the Tier 2 suppliers as we consider the greatest risk lies in the procurement of energy management equipment. We have elaborated further on why this is a potential supply chain risk below.



Potential Modern Slavery Risks in Our Operations and Supply Chain

Due to the stable nature of our operations, in this Reporting Period, we continued to be exposed to largely the same type of risks of modern slavery practices in our supply chain as in previous years.

The flowchart below illustrates the risk assessment framework and key steps we follow to identify, assess, and address modern slavery and other ethical risks in our operations and supply chain.



For each element of our Risk Assessment Framework, we have outlined below the Energy Locals Group's approach to prevent modern slavery.



1. Design – Implementing an effective modern slavery framework

a. Governance

The Group’s Legal and Compliance function is primarily responsible for identifying and managing risks arising under the *Modern Slavery Act* and ensuring that all relevant stakeholders across the business understand modern slavery risks.

The Legal/Compliance function reports directly to the Energy Locals Group’s Executive Leadership Team and provides updates to the Energy Locals Group Board of Directors as required.

With recognition of the importance of diverse perspectives in effectively assessing and managing risk, a Modern Slavery Working Group was established. The Working Group is chaired by a member of the Legal team and comprises representatives from each business unit (including finance, wholesale, marketing, and information technology).

Each member of the Working Group is expected to act as the key contact for their respective business unit on modern slavery matters, including to:

- Contribute to policy development;
- Provide updates and insights into their area’s risk profile and due diligence activities; and
- Escalate identified modern slavery risks or concerns and support appropriate mitigation or remediation actions.

The Working Group was established toward the end of the Reporting Period, meaning many initiatives will guide our future direction. Its role will continue to evolve and expand as we enhance our approach to identifying, managing, and mitigating modern slavery risks across the organisation.

Objectives of Modern Slavery Working Group (as per the Terms of Reference)

- Identify, assess, and address risks of modern slavery within our operations and supply chains.
- Promote staff awareness and ensure access to training on modern slavery issues.
- Support the development and implementation of due diligence processes, remediation measures, and relevant policies.
- Foster cross-functional collaboration to strengthen transparency, accountability, and continuous improvement.

b. Policies

The Energy Locals Group has a framework of policies and processes in place to mitigate, and identify, potential and actual human rights risks, including modern slavery, resulting from our internal business operations as well as the relationships associated with our operations.

The Energy Locals Group policies are all easily accessible having been published on the website, or where more appropriate on the intranet or provided directly to suppliers.

Key relevant policies

- **Modern Slavery Policy**

This policy, which was updated in 2024, is a set of guidelines established to demonstrate the Energy Locals Group’s commitment to combatting and preventing modern slavery and human trafficking in its operations and supply chains.

The policy outlines the Energy Locals Group’s stance against these unethical practices, affirming a zero-tolerance approach towards any form of forced labour, human trafficking, or exploitation.



- **Code of Conduct**

The Code of Conduct, which was reviewed and updated during the Reporting Period contains standards of behaviour that are expected of employees of the Energy Locals Group. Such expectations include responsible decision making and ensuring compliance with all laws and regulations relevant to our industry and maintaining high ethical standards at all times.

- **Supplier Code of Conduct**

The Supplier Code of Conduct is designed to articulate our expectations and requirements for all suppliers, which includes all companies or individuals (other than Energy Locals Group Employees) that supply goods, materials, or services to the Energy Locals Group.

- **Whistleblowing Policy**

The purpose of this policy is to explain how employees should address a situation where they suspect that something unlawful or unsatisfactory is happening within the Energy Locals Group.

- **Environmental, Social and Governance and Sustainability Policy**

This policy outlines the Energy Locals Group's commitment to responsible business practices and sustainability. It serves as a guiding document to inform decision-making, improve transparency, and communicate the company's commitment to stakeholders, including investors, customers, employees, and the public.

- **Equal Employment Opportunity (EEO), Anti-Discrimination, and Workplace Behaviour Policy**

This policy, which was reviewed and updated during the Reporting Period, outlines our approach to equal employment opportunity, anti-discrimination, harassment prevention, and positive workplace behaviour. It also addresses

our positive duty under applicable anti-discrimination laws to take reasonable and proportionate measures to prevent unlawful conduct.

c. Guidance from authorities

In designing and implementing an effective modern slavery framework, we are guided by the most recent guidance from government authorities, and prominent industry associations, concerning control measures for combating modern slavery. For example, we've taken learnings from the Clean Energy Council's "Addressing Modern Slavery in the Clean Energy Sector."¹

We've also utilised the various resources available on the Modern Slavery Register, including the procurement toolkit and template clauses.

We utilise the Walk Free Global Slavery Index which provides us with a detailed picture of key trends based on geographic location and industry for modern slavery.

By considering the Global Slavery Index, the Energy Locals Group is able to understand and identify key risk areas based on global trends, based on geographic location and business type, that may be relevant to our own supply chains.



High-risk geographies



High-risk business models



Vulnerable populations



High-risk procurement strategies

¹ Clean Energy Council's "Addressing Modern Slavery in the Clean Energy Sector: A white paper by the Clean Energy Council in collaboration with Norton Rose Fulbright Australia.



2. Assess – Understanding key risk areas

Based on guidance obtained from relevant authorities and industry reports, we have performed a broad assessment of our supply chain using the classification and categorisation of suppliers outlined above.

From this risk assessment, while we acknowledge that the possibility of modern slavery cannot be entirely ruled out and may exist within the broader supply chains in connection with our procurement of renewable energy equipment (notably solar panels), the overall risk of modern slavery within the Energy Locals Group’s operations and supply chain has remained low and similar to previous years.

The Energy Locals Group’s workforce and direct supply chain is predominantly based in Australia, a country identified by the Global Slavery Index as having one of the lowest levels of vulnerability to modern slavery in the Asia-Pacific region.²

a. Procurement of goods

While we do not have any direct relationships with suppliers in potential high-risk geographic locations, we recognise that renewable energy equipment, which we procure, has been flagged as a higher risk for modern slavery.

We have identified that the following goods procured by the Energy Locals Group are a high risk:

Product	Risk
Solar Panels	<p>Solar panels remain within the top five at-risk of modern slavery products for Australia with the source country being China due to the need for a silica-product (polysilicon) derived from quartz sand.³</p> <p>China is the market leader in polysilicon production and in 2021 about 45 per cent of the world’s polysilicon supply originated from the Uyghur region which is an area reported to be at high risk of forced labor in connection with the collection of raw quartz and its purification into solar grade polysilicon.⁴ The high proportion of global polysilicon that is manufactured in this region means that the risk of forced labour entering into the supply chains of Australia’s solar energy industry is significant.⁵</p>
Batteries	<p>Energy companies face significant modern slavery risks concerning the sourcing of cobalt used in batteries. The labour involved in mining and supplying cobalt is frequently linked to modern slavery practices such as forced labour and the use of child labour.</p>
IT Equipment	<p>Electronics imported into Australia from China and Malaysia continue to constitute the highest-risk imported product category for modern slavery, as assessed by import value.⁶</p>

2 <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

3 <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

4 Walk Free, Global Slavery Index 2023, <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>, p 149 and “Beyond Compliance in the Renewable Energy Sector: Assessing UK and Australian Modern Slavery Act Statements,

5 The high proportion of global polysilicon that is manufactured in Xinjiang means that the risk of forced labour entering into the supply chains of Australia’s solar energy industry is significant.

6 <https://www.walkfree.org/global-slavery-index/country-studies/australia/>



The Energy Locals Group acknowledges this risk and has a list of 'blacklisted' regions, which the Energy Locals Group refrains from procuring materials from, particularly renewable energy materials. For example, we are restricted from engaging any suppliers that we are aware of operating, or with links in their supply chain, to the Uyghur region.

b. Procurement of services

As stated previously, we do not have any direct relationships with suppliers in high-risk geographic locations. However, we acknowledge that, our suppliers may subcontract, which increases the complexity of operations and supply chains. It also decreases the visibility of labour risks and impacts.

Similarly, we also have energy supply arrangements with companies of significant size, which may have global operations, and we acknowledge that this can introduce additional layers of supply chain risk.

We have reduced modern slavery risks in some key areas by engaging staff directly in Australia rather than outsourcing overseas.

Our risk assessment has demonstrated that modern slavery risks may arise in respect of procurement of cleaning services and subcontractors engaged to install energy management equipment.

Service	Risk
Cleaning	As a sector, cleaning is considered high-risk for modern slavery and exploitation due to the nature of the workforce.
Energy management installation and maintenance labour	The Energy Locals Group engages contractors to support with the installation and maintenance of equipment. We recognise that some of the smaller subcontractors engaged by our primary contractors may not have the expertise or resources to implement robust processes for managing social risks, including modern slavery and broader human rights impacts, which presents a potential risk within our supply chain.

c. Supplier due diligence processes

Modern Slavery risk assessment is embedded in the Energy Locals Group decision-making processes when engaging new suppliers or considering renewing our engagement

Prior to the engagement of any major or high-risk suppliers we assess the risk of modern slavery.

We typically require all new suppliers to complete a detailed modern slavery questionnaire to ensure they align with our sustainability and ethical standards. This may occur at the tender evaluation stage, onboarding of a new supplier, or periodic assessments for ongoing suppliers or when assessing an investment opportunity.

The modern slavery questionnaire is designed to assess and mitigate the risks of forced labour and human trafficking within our supply chain. The questionnaire requests information on the suppliers' modern slavery policy, compliance with the *Modern Slavery Act*, labour and recruitment processes and any identified supply chain risks. In designing our questionnaire, we strived to find an appropriate balance to ensure it is detailed enough for us to gain an understanding of the supply chain risks and the supplier's readiness (in the event exploitative practices were discovered in their supply chain), while remaining practical and accessible for prospective suppliers to complete.

The responses provided by suppliers are reviewed to identify any red flags or areas of concern. Based on this assessment, more detailed due diligence may be performed.

We also often check the Commonwealth Modern Slavery Register to understand the extent of a supplier's Modern Slavery compliance and transparency. While we recognise further due diligence is still needed, the presence of a modern slavery statement is considered a positive indicator that the entity is actively engaging with modern slavery risk management.

If, based on this risk assessment, the party receives a low risk profile, the third party can be progressed to the decision-making process.

A medium or high preliminary risk profile, however, necessitates more detailed assessment and discussion before we engage them.

High-risk suppliers

When considering the level of modern slavery risk associated with engaging with a particular supplier, we focus on the key factors identified in the design stage (geographic region, industry, vulnerable population etc) which elevate the risk of modern slavery. Where multiple high-risk factors co-exist, we consider there to be a greater likelihood that actual harm is being experienced.

Findings assessed to be high risk (or at times all levels of risk) will be raised to the Board, on a case-by-case basis, to determine whether to proceed or discontinue engagement.

3. Mitigate - Actions addressing modern slavery risks in our operations and supply chain

Ongoing assessment of the risk of modern slavery in our business operations is a critical step in ensuring ethical and responsible practices.

The Energy Locals Group has adopted the measures set out below to ensure that we can continue to effectively monitor and mitigate the risk of modern slavery within our operations and supply chain.

a. Training and capacity building

Our Legal and Compliance teams have led knowledge-building initiatives to ensure that senior management and the teams with a higher-risk, including IT and the asset management team, have a strong understanding of the local and international regulations, standards, and legal requirements relevant to modern slavery risks in the Energy Locals Group's supply chains.

Training is an important component of our approach. All direct employees and members of our extended workforce are required to complete mandatory annual training covering our Code of Conduct, equal opportunity principles, and related ethical obligations. This training reinforces our expectations and helps build organisational capability to identify, assess, and escalate potential modern slavery concerns.

b. Reporting mechanisms

Any concerns related to human rights impacts in the Energy Locals Group's operations or in its supply chain are to be reported in accordance with the whistleblowing framework.

All team members are expected to report known or suspected violations of applicable laws, regulations, policies, and the companies' broader ethical standards.

c. Employee recruitment and remuneration

The Energy Locals Reporting Entities have processes in place to ensure compliance with applicable workplace relations laws and regulations. Our recruitment processes ensure that all recruitment is consistent and fair and in accordance with our values of diversity and inclusion. Checks are undertaken during the recruitment process to verify age and rights to work.

d. Commitment from suppliers

i. Supplier code of conduct

We require new contracted suppliers to comply with our Supplier Code of Conduct and demonstrate their commitment to doing so.

The Supplier Code of Conduct outlines our expectation that our suppliers must have in place adequate procedures to identify, prevent, mitigate, and account for modern slavery and other human rights impacts in their operations and supply chains and have in place appropriate record-keeping to monitor compliance with immigration laws.

We also expect suppliers who engage sub-contractors while providing goods or services to us to make them aware of this code, monitor compliance with this code and to notify us of any breaches and take reasonable steps to address, remedy and prevent repetition of any breach of this code or possible breaches of this code.

Compliance with our Supplier Code of Conduct is used as part of our supplier evaluation, selection, and contract management process. This is complemented by a modern slavery questionnaire.

If a supplier does not meet our requirements, corrective action plans may be established and monitored for progress, as elaborated further in the section on how we remediate and respond to modern slavery.

ii. Contractual clauses - Procurement contracts

We ensure that modern slavery obligations, including the commitment to our Supplier Code of Conduct, are a contractual commitment with our suppliers.

Our asset delivery team, who are responsible for procurement, work closely with members of our Legal and Compliance team to ensure that all contracts appropriately manage supply chain risk.

Contractual clauses requiring suppliers to comply with modern slavery and human rights laws, as well

as our Supplier Code of Conduct, are included in our standard contract templates and purchase terms.

When we review contractual documents prepared by third-party suppliers, we ensure that modern slavery obligations are included. If a counterparty is unwilling to accept such clauses, this is treated as a risk indicator and prompts further discussions to understand the supplier's concerns and assess whether appropriate safeguards can be met.

4. Remediate – Responding to modern slavery

Thankfully, we have not yet identified an instance of modern slavery in our supply chain or an instance which requires remedial action.

However, in preparation for potential identification of modern slavery risks within our operations and supply chain, our planned approach to remediation involves a proactive and comprehensive strategy. If modern slavery or a heightened risk of modern slavery is identified, the Energy Locals Group will take immediate and appropriate action in line with the *Australian Government's Guidance for Reporting Entities*. This guidance explains the importance of not attempting to resolve the situation independently, as doing so may inadvertently harm victims.

Subsequently, thorough investigations into the root causes of any identified risks will be conducted, facilitating the implementation of tailored corrective measures. These actions may involve renegotiating supplier contracts to enforce ethical guidelines, strengthening monitoring systems, and providing further training to both our suppliers and internal teams on ethical practices. Our approach may differ depending on the specific location and cultural context of the issue.

In cases where a supplier is not willing to address modern slavery concerns or to engage in discussions and there is no reasonable expectation of change, we will consider ending the supply relationship.



5. Monitor and Review - Assessing the effectiveness of our actions

a. Reviews of human resources processes

As part of our continued commitment to identifying and reducing the risk of modern slavery across our operations, we have thoroughly reviewed our recruitment practices, employee engagement initiatives, and remuneration frameworks.

With respect to employee engagement, we are consistently assessing our approaches to ensure we maintain a supportive and transparent workplace where every employee feels confident to raise any concerns or indicators of modern slavery. This ongoing focus is essential in strengthening a culture of awareness and vigilance throughout the organisation.

In relation to our remuneration practices, we have examined our pay structures to ensure that all remuneration packages remain competitive, transparent, and compliant with the appropriate employment awards, reinforcing our commitment to ethical conduct.

b. Enabling reporting mechanisms

We ensure that any information reported through our various grievance or whistleblower mechanisms is scrutinised so that we can identify any recurring patterns that may indicate the presence of modern slavery risks within our operations and supply chains.

We encourage all staff to feel comfortable raising concerns, knowing they will be treated confidentially, sensitively, and without fear of retaliation. We are committed to fostering a culture where employees understand the importance of speaking up and feel supported to do so through clear, accessible, and trusted reporting pathways.

c. Continual assessment and ongoing improvements

We monitor the effectiveness of our actions to identify and manage modern slavery risks through regular internal governance reviews. We recognise that our risk assessment processes must be regularly updated to remain effective. The evolving nature of our business operations, as well as the global modern slavery landscape, requires a risk management framework that is flexible, responsive, and continually refined.

As outlined above, a key aim of the newly formed Modern Slavery Working Group is to achieve a deeper understanding of necessary process improvements across each business unit. Building on previous reviews, we aim to adapt and strengthen our actions to continually improve our response to modern slavery risks.

We also utilise key performance indicators to assess the effectiveness of our actions to identify and address modern slavery practices across our operations and supply chain. One such indicator is the number of complaints or reported instances, which to date has been zero.

As part of our ongoing efforts to understand our supply chain, we repeat our supplier categorisation process annually to identify new trends and areas requiring attention.

Ongoing improvements & future actions

The Energy Locals Group recognises that minimising risk of modern slavery in the supply chain requires ongoing improvements. In the next reporting period, our priorities include the continued expansion of the Modern Slavery Working Group. Through this group, the following initiatives are planned:

- Conduct a review and refresh of the Supplier Code of Conduct and supplier engagement questionnaire;
- Roll out further modern slavery training across the business, to focus on any gaps in knowledge; and
- Enhance processes, with a review of potential barriers, required to implement supplier audits.

Consultation and Approval

This Statement has been prepared to meet the mandatory reporting criteria set out under the Act.

All Energy Locals Reporting Entities were actively engaged with and consulted in the development of this statement.

The Board of directors of the Catapult Holdco Pty Ltd reviewed and approved this Modern Slavery Statement on behalf of its subsidiaries (the reporting entities and the controlled entities), as listed in Annexure B.

As permitted under section 14(2)(d)(iii) of the Act, the Statement has been approved by the governing body, of Catapult Holdco Pty Ltd. At the time of approval, EL Retail Energy Pty Ltd was no longer a controlled entity. However, EL Retail Energy Pty Ltd was consulted during the preparation of the Statement and provided approval of the Statement on 28 November 2025.

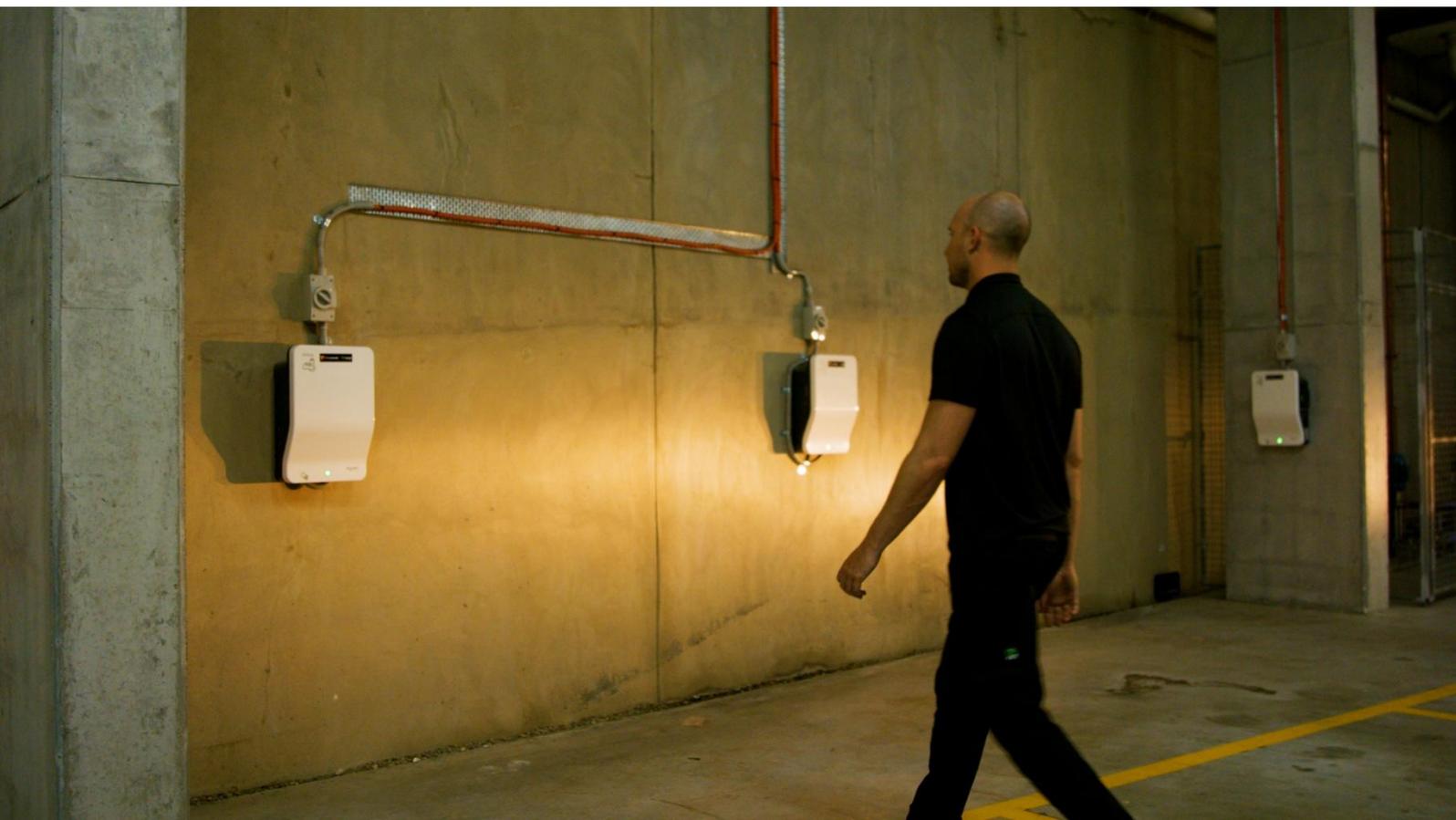
The statement was approved by Catapult Holdco Pty Ltd on 19 December 2025. The Board authorised the Chief Executive Officer, Adrian Merrick, to sign this statement on their behalf.





Appendix A - Mandatory Criteria

Mandatory Criteria	Page number(s)
Identify the reporting entity	Page 4 and Annexure B
Describe the reporting entity's structure, operations, and supply chains.	Page 4 -8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 10, 13-14
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 12-16
Describe how the reporting entity assesses the effectiveness of these actions.	Page 17
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Page 18



Appendix B – Energy Locals Reporting Entities & controlled entities

Reporting entities		
Catapult Holdco Pty Ltd	ACN 681 829 578	
Catapult Midco Pty Ltd	ACN 681 830 302	
Catapult Bidco Pty Ltd	ACN 681 839 704	
ACPT Operating Pty Ltd	ACN 651 252 934	
Energy Trade Pty Ltd	ACN 165 688 568	
EL Retail Energy Pty Ltd	ACN 606 408 879	Note: no longer within the Energy Locals Group at the time of this Statement.

Controlled entities as at 30 June 2025		
Energy Locals BTR Pty Ltd	ACN 664 534 098	
Strata Services Corporation Pty Ltd	ACN 622 568 718	
Strata Renewable Energy Pty Ltd	ACN 637 530 235	Note: no longer within the Energy Locals Group at the time of this Statement.
Strata Energy Services Pty Ltd	ACN 622 570 156	





Energy Trade Pty Ltd

ABN 79 165 688 568

Level 13, 300 Flinders Street,
Melbourne, VIC 3000

