

FY25 Modern Slavery Statement



Squadron Wind Energy Assets Pty Ltd
ACN 652 283 639

9 December 2025



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CEO Message

I am pleased to present Squadron Wind Energy Assets' Modern Slavery Statement for FY25.

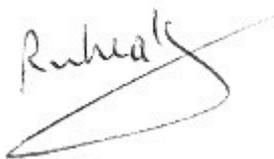
We know that the green energy transition has been linked to significant human rights risks, particularly in renewable energy supply chains. Traceability remains a significant challenge. Nevertheless, we have taken the following steps in 2025 to strengthen our ability to identify and address risks:

- Improved our reporting to our Board and management sustainability committees on our modern slavery related activities.
- Established a multi-disciplinary Modern Slavery Working Group to identify opportunities to improve our ways of working, to better identify and manage modern slavery risks.
- Reviewed and updated our approach to modern slavery risk assessment as a standard part of our procurement process, including how we identify our material suppliers based on inherent risk and spend, to ensure we are maximising our leverage to drive modern slavery improvements across our supply chain.
- Became a member of SEDEX to help improve our supply chain visibility, gain access to existing supplier data on its platform, and to share the outputs of our due diligence activities.
- Engaged and informed our people on the key role they play in helping Squadron identify and manage our modern slavery risks.

So far, our assessments and actions have not identified any confirmed instances of modern slavery within our operations or supply chains. However, we recognise that given the complexity of global supply chains, such instances are not always immediately identifiable and can be hidden from view.

We acknowledge that millions of people worldwide - including within Australia - are still trapped in modern slavery, and we remain committed to strengthening and investing in our approach to modern slavery risk management. Addressing this challenge is enormously complex and demands collective effort across industries, governments and communities.

At Squadron, we believe the Commonwealth Government's review of the Modern Slavery Act provides an opportunity to move beyond transparency and drive effective action that improves the lives of vulnerable workers. To do this, we all have a responsibility to actively find and address risks – not just report on them. We support the introduction of a mandatory due diligence obligation in the Modern Slavery Act, alongside effective enforcement mechanisms. This will align Australia with international standards and create a clear framework that levels the playing field for business. Most importantly, it will drive meaningful change that protects the people in our workforces and supply chains from serious human rights abuses.



Rob Wheals
CEO, Squadron Wind Energy Assets
09 December 2025

1 Our Squadron Values

At Squadron, our values are at the heart of everything we do. They drive our culture and philosophy and underpin our approach to conducting business. They are:

Family	Integrity	Generating Ideas
Empowerment	Enthusiasm	Humility
Frugality	Safety	
Stretch Targets	Courage and Determination	

We are committed to acting ethically and with integrity across all aspects of our business. We strive to uphold and protect the rights of all of those who work for, or on behalf of, our organisation. We are also committed to protecting and respecting the rights of people who may be impacted by our activities, including those in our supply chains.

2 Reporting Entity and Overview

This Modern Slavery Statement (**Statement**) is made by Squadron Wind Energy Assets Pty Ltd ACN 652 283 639 (the Reporting Entity, pursuant to the *Modern Slavery Act 2018 (Cth)* (Modern Slavery Act) for the period 1 July 2024 – 30 June 2025 (Reporting Period). In this Statement, the terms ‘Squadron’, ‘Squadron Wind Energy Assets’, the ‘Company’, ‘our business’, ‘organisation’, ‘we’, ‘us’, ‘our’ and ‘ourselves’ refer to Squadron Wind Energy Assets Pty Ltd and its subsidiaries.

This Statement describes:

- the structure, operations and supply chains of Squadron Wind Energy Assets;
- the risks of modern slavery practices in our operations and supply chains;
- the actions we are taking to assess and address these risks, including due diligence and remediation processes;
- our assessment of the effectiveness of these actions; and
- the process of consultation with subsidiary entities owned or controlled by Squadron Wind Energy Assets.



Bango Wind Farm

3 Structure, operations and supply chains

3.1 Squadron Wind Energy structure

Squadron Wind Energy Assets is a wholly owned entity of Squadron Energy Pty Ltd (**Squadron Energy**), which is itself a company owned by Tattarang Pty Ltd,¹ one of Australia’s largest private investment groups, owned by Andrew and Nicola Forrest.



Figure 1 - Squadron Wind Energy Assets corporate structure (simplified)

3.2 Squadron Energy’s operations

Squadron Energy is Australia’s leading renewable energy company that develops, operates and owns renewable energy assets in Australia. We are 100% Australian owned and are here for the long term. We have 2 gigawatts (GW) of renewable energy in operation and under construction. Central to Squadron Energy’s business is the development of renewable energy projects, predominantly wind, while also exploring solar, battery energy storage systems (BESS) and firming assets. Our operations lifecycle is summarised in **Figure 2**, below.

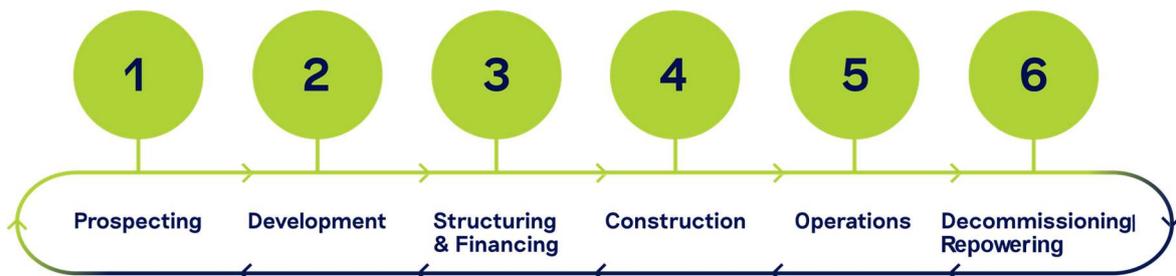


Figure 22 – Squadron Energy Operations Lifecycle

¹ <https://www.tattarang.com/who-we-are/>

As of 30 June 2025, Squadron Energy's total workforce comprised 269 full time equivalent staff. Employee tenure data over the reporting period reflects the nature of our project-related work, as set out below:

- Permanent: 81%
- Fixed term: 6.6%
- Contractors: 11.4%
- Casual: 1%

Squadron Energy's related entity is delivering the Port Kembla Energy Terminal (PKET) - Australia's first LNG regassification terminal to provide the gas required to firm renewable energy and ease structural supply shortages. Squadron Energy's assets and projects in development, construction and operating phases are set out in **Figure 3** below.

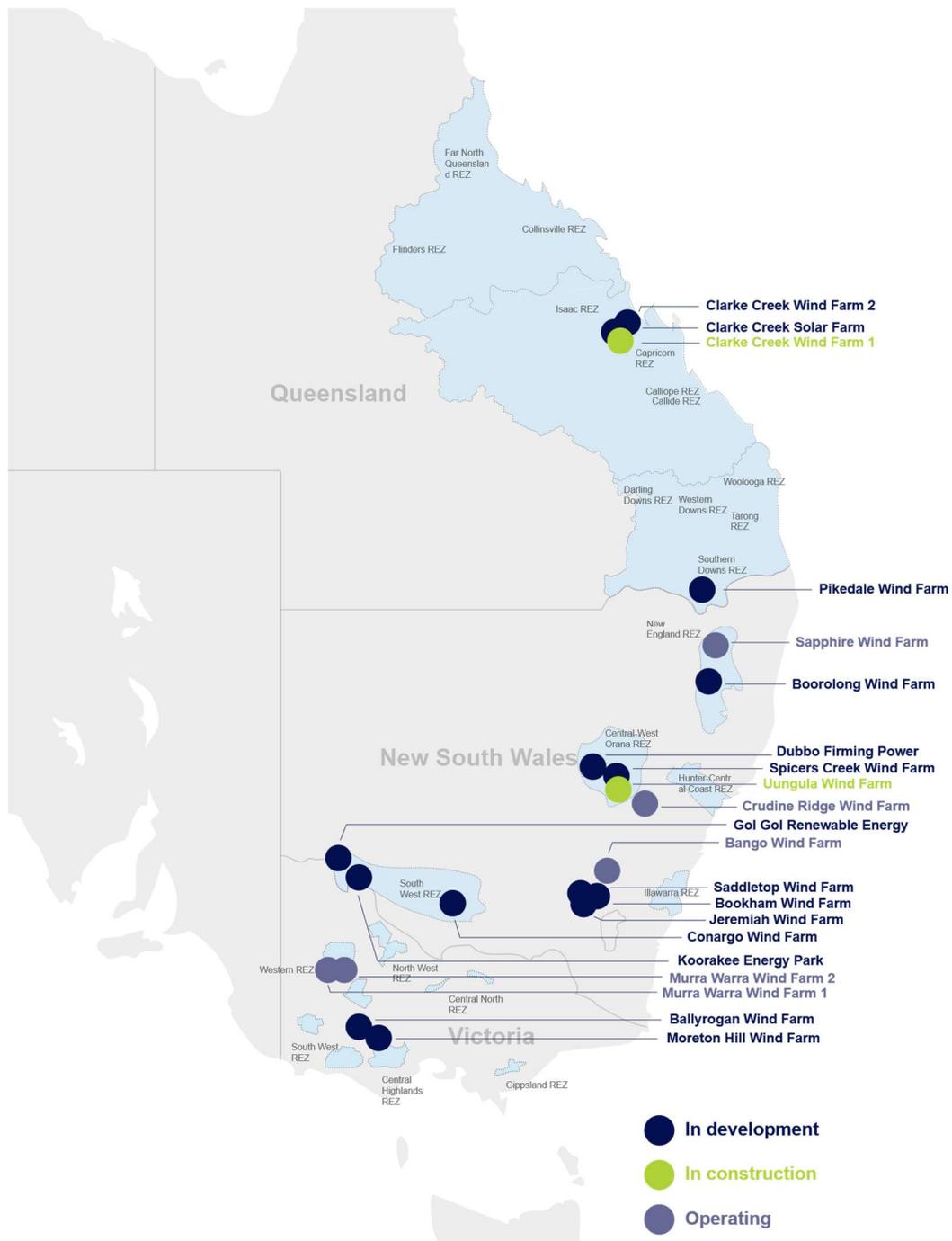


Figure 33 – Squadron Wind Energy Assets' projects and assets

3.3 Squadron's supply chains

Squadron's supply chains encompass a network of more than 700 direct (Tier 1) suppliers, with 97 per cent (by number) based in Australia.

During FY25, Squadron sourced goods and services from Tier 1 suppliers located in 11 different countries; almost 91 per cent of spend was with Australian-domiciled suppliers, approximately nine per cent with suppliers based in Singapore, and immaterial spend with Tier 1 suppliers based in New Zealand, USA, Western Europe and Philippines. Refer to **Figure 4** below for details.

We recognise that some of these Australian-domiciled suppliers are owned by companies with head offices located in other countries, including those with elevated modern slavery risks. Over FY26 and beyond, we aim to deepen our view of supply chain risks by working closely with our most material, direct suppliers to map their own Tier 1 (our Tier 2) suppliers. This collaborative approach with our suppliers engenders trust and transparency of modern slavery risks deeper into our supply chains. We will disclose this information in subsequent statements.

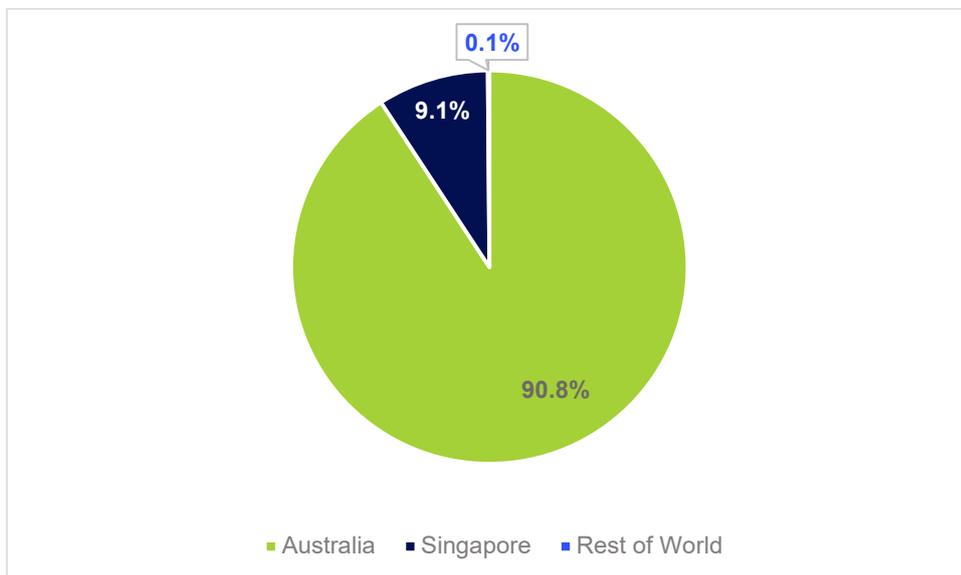


Figure 4 - Tier 1 Supplier Spend by Location of Domicile

4 Risks of modern slavery practices in our operations and supply chains

4.1 Risks in our Operations

Squadron's operations are limited to Australia.

Squadron's workforce is based in Australia and employed in compliance with local laws and regulations. Our terms and conditions of employment are underpinned by the *Fair Work Act 2009 (Cth)* and the National Employment Standards (NES). All our workers are paid a living wage.

Our contracts of employment set out the minimum terms and conditions of employment, in line with the NES, including:

- Maximum weekly hours of work.
- Leave entitlements, including annual leave, long service leave, public holidays, parental leave, compassionate leave, personal/carer's leave, community leave, jury service leave and family and domestic violence leave.
- Benefits such as remuneration and Superannuation.
- Notice of termination and redundancy.

4.2 Risks in our supply chains

The main areas of modern slavery risk identified in our supply chain are set out below.

4.2.1 Raw materials and manufacturing of renewable technologies

Renewable technologies represent a higher risk of modern slavery due to the reliance on certain technologies and the geographies of the supply chain, particularly in developing countries. This is due in part to the sourcing of critical minerals and other materials that are essential inputs to renewable technologies which are often extracted in countries with lower labour rights protections and with a greater risk of forced and child labour. These materials can include balsa wood, fibreglass, carbon fibre, steel and some rare earth minerals.

Solar panel manufacturing and polysilicon supply chains, notably in China, present a higher risk of modern slavery. While Squadron does not currently have solar projects in advanced development, we are committed to conducting rigorous modern slavery due diligence of prospective suppliers to evaluate modern slavery risks in any future sourcing of solar energy components.

Additionally, the rapid uptake of renewable energy has resulted in supply pressures on manufactured goods, with greater volumes required in shorter time frames. Where risks are identified through the procurement of renewable technologies, we conduct due diligence over prospective suppliers, and in some instances, conduct independent site-based social audits to attempt to identify instances of modern slavery. We also maintain an open dialogue with the prospective suppliers whilst corrective actions are addressed.

4.2.2 Links to Xinjiang Uyghur Autonomous Region (XUAR)

It has been widely reported, including in Walk Free's Global Slavery Index and by the Clean Energy Council³, that state-backed forced labour among Uyghur, Kazakh and other ethnic minorities in sectors such as agriculture, textiles and manufacturing has been occurring in the XUAR of China. Squadron acknowledges evidence that forced labour is used in factories in XUAR. The goods produced in these factories reach global supply chains and have been connected to more than 80 well-known global brands in the apparel, technology, automotive, and solar sectors. It is clear through our own efforts and consultations with experts that mapping supply chains and undertaking supply chain audits in the region is extremely difficult. However, we continue to actively monitor and engage with high-risk areas of our supply chains and seek advice and expertise to identify suppliers that demonstrate better practices. For example, our template contracts require our

counterparties to warrant that they do not engage in their supply chain any suppliers or subcontractors based in, or which have operations in, the XUAR.

4.2.3 Construction industry workforce and materials supply chain

Squadron engages contractors to construct our energy projects, which often involve outsourcing to subcontractors. According to the Walk Free Global Slavery Index², the construction sector in Australia has been identified as at risk of modern slavery practices, due to the incidence of labour hire companies and temporary migrant workers employed in the sector. Temporary, short-term and day-labour contracting poses a risk to workers because the principal company may not have oversight of recruitment and management practices. In order to mitigate this risk, Squadron uses specific modern slavery contractual arrangements and actively engages with construction companies to ensure they understand how to address these risks.

² The Global Slavery Index 2023, Minderoo Foundation. Available at: <https://www.walkfree.org/global-slavery-index/>, last accessed 28 October 2025.

³ Clean Energy Council, November 2022: Addressing modern slavery in the clean energy sector, available at <https://assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf>, last accessed 18 November 2024.

5 Assessing and addressing modern slavery risks in our supply chain

To assess and address potential modern slavery risks in our operations and supply chain, Squadron has developed a Modern Slavery Policy with a framework comprised of four areas:

1. Governance.
2. Risk Assessment.
3. Supplier Due Diligence, Evaluation, Corrective Action and Remedy.
4. Training and Collaboration.

5.1 Governance

The Directors of Squadron have ultimate responsibility and oversight of the organisation's management of modern slavery risks. The Board has delegated this duty to the Health, Safety, Environment and Sustainability Board Committee.

In early FY25, Squadron established its own Modern Slavery Working Group to develop, implement, and monitor Squadron's approaches to prevent, identify, and address modern slavery within the organisation and its supply chains. The Working Group led the development of improvements during the reporting period, as detailed in **section 6** below.

Squadron participates in Tattarang's Modern Slavery Community of Practice. This group comprises representatives from Squadron together with representatives from Tattarang's other portfolio companies. The Community of Practice is a forum where members can raise issues and share insights to continually improve on modern slavery risk management practices.

During FY25, the Community of Practice continued its governance role through its review of modern slavery risk management performance across the Tattarang group. Squadron's representatives attended Tattarang's Modern Slavery Community of Practice meetings, which were held monthly. Key topics and lessons shared at the Community of Practice included:

- Setting minimum expectations for Tattarang portfolio companies in assessing and addressing modern slavery risks in operations and supply chains
- Approaches to supplier materiality-based modern slavery evaluation
- Onboarding to the Sedex platform as a tool for managing supplier risk evaluation and engagement.

5.1.1 Policies

Squadron's policy framework relevant to modern slavery includes:

- Code of Conduct
- Human Rights and Modern Slavery Policy
- Whistleblower Policy
- Supplier Code of Conduct
- Modern Slavery Remedy Process.

Code of Conduct

Our Code of Conduct (the Code) serves as the tool through which we translate our Values into everyday actions and behaviours. The Code establishes the high standards to which we hold ourselves and one another accountable, including upholding human rights and combatting modern slavery.

Human Rights and Modern Slavery Policy

Our Human Rights and Modern Slavery Policy sets out our commitment to protecting and respecting the rights of all people, including our employees, partners and those who may be impacted by our activities, and

describes how we seek to deliver on our commitment to ending modern slavery. This commitment is underpinned by core principles, including:

- No forced or bonded labour.
- No worker should pay for a job.
- Workers should be treated and paid fairly for the work they do.
- No child labour.
- Respecting the rights of workers to freedom of association.
- Workers should be able to raise grievances safely.

These core principles have been informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organisation's Core Conventions on Labour Standards and the United Nations Global Compact.

Squadron expects that all those we engage with – our suppliers, consultants and contractors – work with us to uphold these core principles.

Whistleblower Policy

The Whistleblower Policy provides a practical tool to encourage and facilitate the disclosure of wrongdoing in our working environment and to ensure that people who disclose wrongdoing can do so safely, securely and with the confidence they will be protected and supported.

Anyone can make a report under this Policy who is or has been:

- an officer, associate or employee of Squadron;
- a consultant, contractor or supplier of goods or services to Squadron, including their employees; or
- Squadron's local community stakeholders, and these people's relatives or dependants (including their spouse's dependents).

Squadron has appointed an external and independent whistleblower service, and included details of service on the Squadron website. The details of the whistleblower service are included in Squadron's Supplier Code of Conduct, which is issued to every counterparty we engage with. The Supplier Code of Conduct is also available on our website.

Supplier Code of Conduct

Our Supplier Code of Conduct sets out our expectations of our suppliers and contractors. Squadron expects suppliers, as a minimum, among other things, to:

- Share our commitment to ethical, safe and responsible business, and support our Values.
- Meet and uphold the standards set out in the Supplier Code of Conduct across their operations and workforce.
- Promote minimum standards, consistent with Supplier Code of Conduct, throughout their supply chain.
- Ensure a grievance process and whistleblower policy is made available to their employees and suppliers.

At onboarding, suppliers are required to read and acknowledge that they understand Squadron's expectations as set out in the Supplier Code of Conduct. During the reporting period, 100% of our new suppliers onboarded agreed to our Supplier Code of Conduct.

Modern Slavery Remedy Process

During the reporting period, Squadron developed a Modern Slavery Remedy Process document. Linked to our Human Rights and Modern Slavery Policy, the Process practically applies the United Nations Guiding Principles on Business and Human Rights (UNGP), particularly in relation to the need for private organisations to provide concrete remedial pathways in appropriate circumstances. As such, the Process is designed to provide guidance and practical steps for responding to instances of modern slavery with which we are linked. These steps are:

1. Investigate and verify allegations
2. Remediate harm to workers
3. Mitigate and prevent future harm

4. Escalate if required, including to law enforcement and/or regulatory bodies
5. Document incident details
6. Review effectiveness of the response.

The Process includes a remediation mechanism for victims, which sets the objective of restoring the rights and dignity of victims through appropriate remedies. Actions considered in the procedure include potentially (as appropriate):

- Offering financial compensation, medical care, legal aid, or psychosocial support.
- Facilitating safe repatriation or relocation if needed.
- Providing access to education, training, or alternative employment.

5.2 Supplier Risk Screening and Engagement

Our network of suppliers is large and identifying the presence of modern slavery can be challenging given the complexity of global supply chains.

Squadron takes a risk-based approach to modern slavery screening and due diligence. We require all new suppliers to be pre-screened prior to being onboarded to determine inherent modern slavery risk.

Suppliers' inherent risk and materiality

We undertake risk screening using third-party risk tools and data to score the inherent risk of potential suppliers based on their geography and industry. We use data on specific supplier sites included within the database, drawing on external data sets such as Walk Free's Global Slavery Index, ITUC Global Rights Index, ILO data on working hours, the United Nations Development Programme, the International Trade Union Confederation (ITUC), and the International Labour Organisation (ILO).

We take a materiality-based approach to supplier due diligence by evaluating both the inherent risk score and the size of our spend with suppliers. The level of materiality dictates the level of due diligence activities which are appropriate to reduce the residual risk. This approach ensures we are focusing our resources on both the highest risk parts of our supply chains and the parts where we have most leverage to drive change.

Supplier's risk mitigation actions

For those suppliers with a higher inherent risk, we seek to understand the supplier's approach to managing that risk through Supplier Assessment Questionnaires (SAQ), which are sent to suppliers to obtain information on the supplier's modern slavery practices, both in its own operations and its supply chains.

These questions relate to:

- Governance and policy frameworks.
- Training.
- Risk identification and assessment.
- Due diligence.
- Employment conditions.
- Grievance mechanisms.
- Remediation.
- Approaches to child labour, forced and bonded labour, and trafficking.
- Associations with high-risk products or services in Australia.

During the reporting period, we identified 16 higher risk suppliers, who were issued with a SAQ to complete.

Residual risk of supplier and requirement for further due diligence

If, through the information obtained in the SAQ, we are not satisfied that the supplier is sufficiently mitigating the risks of modern slavery, we will undertake further due diligence including desktop-based audits, management interviews, site visits and audits, as appropriate.

During the reporting period, we conducted further due diligence on one supplier: an OEM manufacturer and supplier of wind turbine componentry, which is critical for Squadron's business operations. Given the complexity, opaqueness and heightened risk of potential forced labour in wind turbine supply chains, we

carried out one site visit, conducted four management interviews, and reviewed and responded to one 3rd party audit in respect of this high-risk supplier. At the time of writing, we are reviewing corrective actions raised during the 3rd party audit mentioned above. We will continue to engage constructively with the supplier to ensure that its management of its supply chain meets Squadron's expectations regarding anti-modern slavery practices.

5.3 Supplier Engagement

Supplier onboarding

During supplier onboarding, we clearly communicate our expectations and provide Squadron's **Supplier Code of Conduct** to prospective suppliers, requesting formal agreement from each supplier to abide by this Code.

Contract terms

Squadron ensures that our contracts with counterparties convey our stringent requirements regarding modern slavery. During the reporting period, our legal team reviewed Squadron's standard contract templates and included Squadron's standard model modern slavery clauses where these were not previously in place. This helps ensure consistency in our engagements with suppliers and sets clear expectations of our counterparties.

5.4 Grievance & Remediation

We did not identify any instances of modern slavery or exploitative labour practices in our operations or supply chains during the reporting period. However, we are aware that modern slavery can be present in almost all supply chains – including those linked to the renewable energy sector - and we are committed to improving our risk identification and assessment processes.

If we identify a situation where Squadron has caused, contributed to, or is directly linked to modern slavery, we are committed to providing remedies, or facilitating access to remedies for all those impacted, in accordance with our Remedy Action Procedure.

5.5 Awareness Raising and Collaboration

During the reporting period, we rolled out mandatory modern slavery training to all our staff, which was completed by 91% of eligible Squadron people. The training module covered:

- Understanding what modern slavery is
- Knowing the types of conduct that is modern slavery
- Identifying and report incidents that present a risk of modern slavery
- Ensuring transparency in your organisation and supply chain
- Contributing to the protection of human rights and prevention of modern slavery.

To further improve awareness of modern slavery management in our business, we conducted presentations to all-staff Town Hall events, focusing on expectations of our staff in conducting pre-screening of potential new suppliers.

Over FY26 we will further prioritise completion of mandatory modern slavery training by all our employees.

6 Assessing our effectiveness

6.1 Key Performance Indicators – FY25

Table 1 FY25 Squadron Key Performance Indicators

Metric	Squadron's FY25 Performance
Suppliers	
Total active suppliers	785
New suppliers onboarded in period	295
% of new suppliers signed to our Supplier Code of Conduct	100%
Risk assessments and due diligence activities	
Suppliers risk assessed	785
No. of suppliers identified as higher materiality, requiring a self-assessment questionnaire (SAQ) to be completed	16
No. of suppliers for which SAQ undertaken	16
Suppliers with elevated residual risk, requiring further due diligence activities (<i>refer below</i>)	1
% of new suppliers which required further due diligence activities	83%
Supplier further due diligence activities	
Site visits /	1
3 rd party audits*	1
Management engagement meetings	4
Corrective actions issued	0
Incidents raised	0
Remedy provided by Squadron	0
Training and Awareness	
% of workforce who completed modern slavery training	91%

* Audit activity commenced in FY25; review of corrective actions was still ongoing at the time of reporting.

6.2 FY25 Improvement Actions

During the reporting year, Squadron conducted the following actions:

- Established an internal Modern Slavery Working Group, reporting to Squadron's Board sustainability committee.
- Improved and standardised our supplier screening processes prior to onboarding.
- Collaborated positively with a key supplier of OEM wind turbine components, including reviewing independent audit findings and corrective actions relating to their operations and supply chains.
- Embedded model modern slavery clauses in supplier contracts.
- Developed and implemented Squadron's Remedy Action Procedure.
- Participated in the Clean Energy Council's modern slavery working group, including a review of the proposed amendments to the Commonwealth Modern Slavery Act
- Signed the Clean Energy Council's pledge to end modern slavery
- Continued to support the Tattarang Modern Slavery Community of Practice.

6.3 FY26 Priority Actions

As we look ahead, Squadron remains committed to strengthening its response to modern slavery risks across its operations and supply chains.

The following priorities are designed to build on our existing progress, further embedding robust processes, systems, and organisational awareness, and to reflect our dedication to continuous improvement, transparency, and collaboration.

- **Enhance procurement framework to embed modern slavery expectations** - strengthen due diligence and reinforce Squadron's commitment to ethical sourcing through aligning our supplier risk screening processes with Squadron's Procurement Framework.
- **Enhance risk management and due diligence practices** – leverage Sedex's capabilities to improve risk assessment, supplier engagement and due diligence practices, including standardised audit methodologies. This will further our understanding of modern slavery supply chain risks beyond our direct suppliers.
- **Formalise Squadron's modern slavery approach** - develop a Modern Slavery Standard, embed in the business, and review for continual improvement.
- **Uplift employee training and awareness** – building on existing foundations, equip employees with targeted resources to drive understanding of Squadron's approach to modern slavery and each person's role in mitigating modern slavery risks in procurement activities. We will prioritise completion of mandatory modern slavery training by 100% of our employees by the end of FY26.
- **Undertake a deep dive into labour-hire practices** – review current labour-hire practices undertaken on Squadron's behalf and work with our partners to uplift practices where required.
- **Uplift contractual terms** – develop an internal process to ensure that contracts entered into on non-Squadron template contracts include our minimum modern slavery expectations

7 Consultation and Approval

During the reporting period this Statement covers, Squadron actively engaged and consulted with all companies it owns or controls, in the development of this statement. We discussed details of the Modern Slavery Act's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

The Board of Squadron approved this Statement on 2nd December 2025, pursuant to section 13(1) of the Modern Slavery Act. This statement is signed by a Director of the Reporting Entity pursuant to section 13(2)(d) of the Modern Slavery Act.

The Squadron Board has been assisted by the work of senior leaders and staff including representatives from Sustainability, Finance, Procurement, Legal and Risk, People & Culture and Corporate Affairs teams. Representatives from the Squadron leadership team also participated in the preparation of this statement.

Annexure - Reporting criteria and correlating page references

Reporting criteria in Section 16 of the <i>Modern Slavery Act 2018</i> (Cth)	Page number
Section 16 (a) Identify the reporting entity.	Page 2
Section 16 (b) Describe the reporting entity's structure, operations, and supply chains.	Pages 3, 4 and 5
Section 16 (c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	Pages 6 and 7
Section 16 (d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes.	Pages 8, 9 10 and 11
Section 16 (e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Pages 12 and 13
Section 16 (f) Describe the process of consultation with:	Page 14
(i) any entities that the reporting entity owns or controls	
(ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.	

Squadron Energy is Australia's leading renewable energy company that develops, operates and owns renewable energy assets in Australia.

We are the largest renewable energy company in Australia.

We are 100% Australian owned and have 2 gigawatts (GW) of renewable energy in operation and under construction.

Squadron aims to be the largest single contributor to Australia's decarbonisation goals.

With proven experience and expertise across the project lifecycle, we work with local communities and our corporate and industrial customers to lead the transition to Australia's clean energy future.

