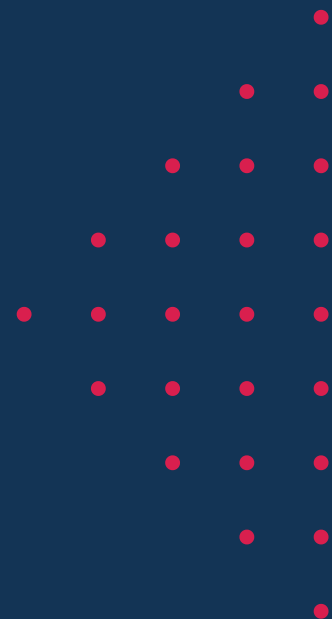




Modern Slavery Statement

Financial Year 2024

energylocals.com.au



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This Modern Slavery Statement (**Statement**) is made in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) and submitted as a joint statement on behalf of the reporting entities outlined in Appendix A (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, Energy Locals) for the period of 1 July 2023 to 30 June 2024 (**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 Energy Locals, unless stated otherwise.

A note from our CEO

I am pleased to release the Energy Locals Group's Modern Slavery Statement for Financial Year 2024.

At Energy Locals we are committed to operating with the highest standards of integrity, respect, and accountability. We recognise that modern slavery, in all its forms, is a significant global issue that can affect individuals, communities, and businesses.

As we strive to provide sustainable energy solutions to our customers, we do so with the firm belief that sustainability extends beyond environmental concerns - it encompasses the social well-being of all individuals involved in our operations.

We understand that it is our responsibility to actively work towards preventing modern slavery in our operations and supply chains. We are dedicated to ensuring that our business practices uphold the rights and dignity of all individuals, and we will continue to take meaningful steps to identify, address, and eliminate any risks of modern slavery within our organisation.

This Modern Slavery Statement outlines our ongoing efforts and the steps we are taking to ensure that our operations and supply chains are free from exploitation. It reflects our dedication to upholding human rights, promoting fairness, and contributing to a world free from modern slavery.



Adrian Merrick

Chief Executive Officer
Energy Locals Group

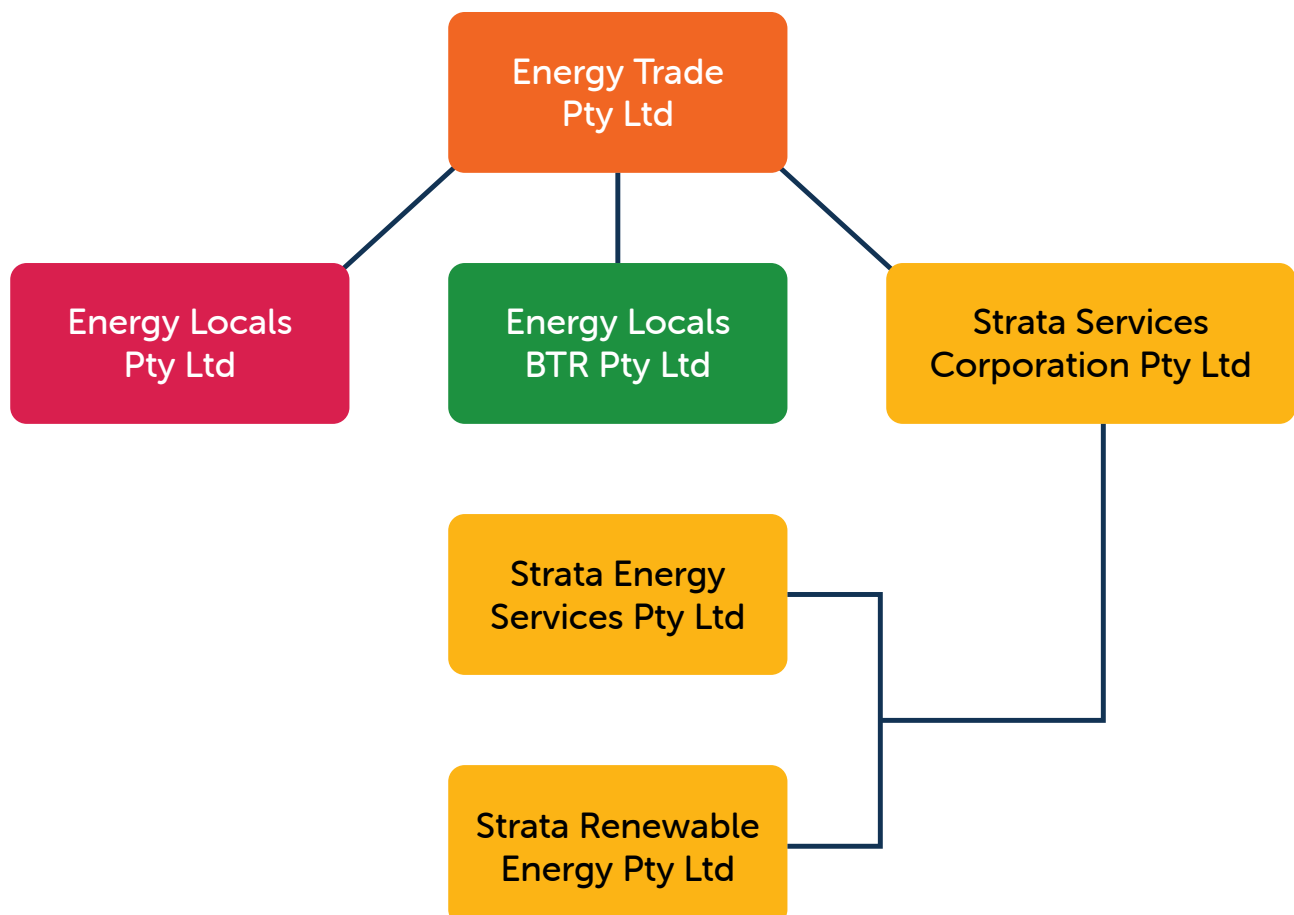
Dated: 11 December 2024

Our structure, operations and supply chain

1. Who are we?

The Energy Locals Group is at the forefront of the energy sector with several service offerings. We are proudly 100% based and operated in Australia.

Within the Energy Locals Group, as depicted by the group structure below there are three key groups, each specialising in different aspects of the industry:



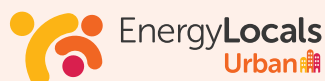
Overview of our services



Energy Locals Pty Ltd (ACN 606 408 879) (Energy Locals) is an energy retailer.

Energy Locals Pty Ltd has been a licenced electricity retailer since 2016, launching initially to customers in New South Wales and south-east Queensland in January 2017.

Since then, we have expanded to cover all remaining states and territories across the National Energy Market – 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.



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.

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.

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.

We also install solar panels and storage solutions on existing properties to give customers access to renewable power.

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.



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), focuses on the specific energy requirements of multi-unit residential communities.

Their services encompass energy audits, consumption analysis, and the implementation of energy-saving initiatives. Strata Energy Services empowers property managers and residents to make informed decisions, reduce their environmental impact, and create comfortable, energy-efficient living environments.

2. Operations

The Energy Locals Group employed approximately 130.9 full time equivalent staff at the end of Financial Year 2024.

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



All forms of modern slavery and related behaviour are forbidden under the Energy Locals Code of Conduct, Performance and Behaviour Policy and Modern Slavery Policy. We also have a comprehensive Work Health and Safety (WHS) Policy and site-specific WHS procedures regarding working conditions. Our direct employees and extended workforce undertake mandatory annual training in relation to the Code of Conduct.

3. Supply Chain

Our supply chain is comprised of the procurement of components, finished goods and commodities and energy for resale, as well as professional services and business support.

Further description of these categories is set out on the following page.



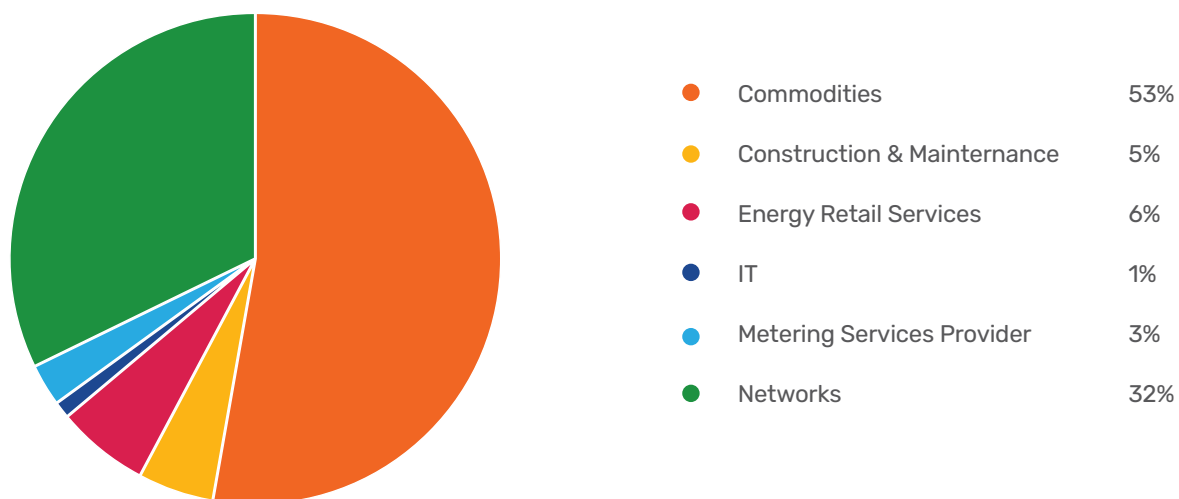
Commodities / Energy for resale 	Wholesale electricity and gas.
Business Services 	Services required for the operation of the business including logistics and warehousing services.
Energy Retail Services 	<p>Services required to operate an energy retail business including retail customer services. This 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
Energy Generation 	<p>Products and materials:</p> <ul style="list-style-type: none"> • E.g. solar panels • Electric vehicle chargers
Professional Services 	<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
Construction and Maintenance 	Components and finished goods required for establishment and operation of embedded networks and associated installation and maintenance services.

To better understand our suppliers, we have categorised them by type and annual spend.

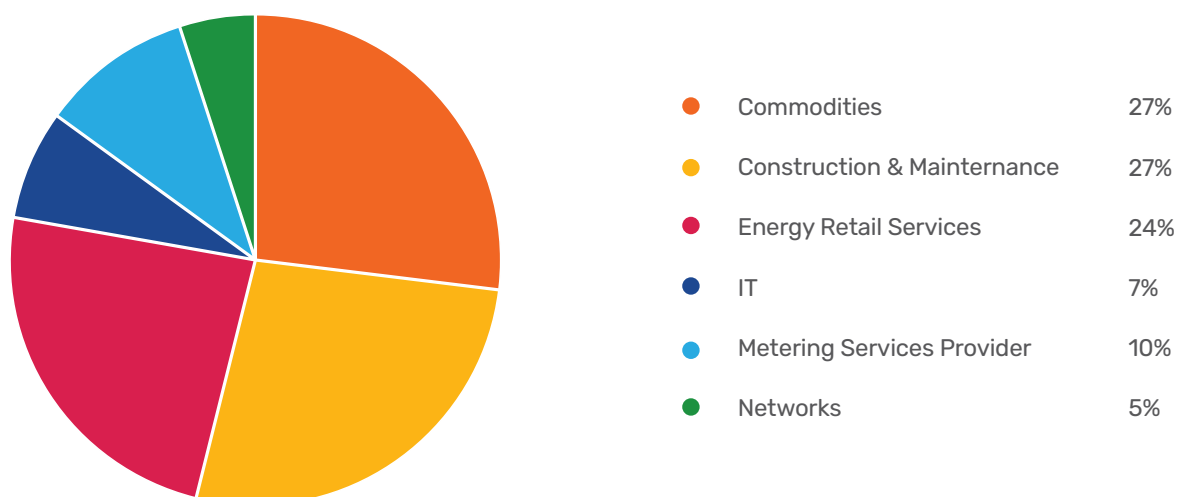
The breakdown of all suppliers with an associated annual spend of over \$500,000 (**Tier 1 Suppliers**), \$201,000 to \$500,000 (**Tier 2 Suppliers**) and \$100,000 to \$200,000 (**Tier 3 Suppliers**) is set out by percentage and category below.

For the purposes of categorising these suppliers, we have grouped business services and professional services 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 is also a key trend in our costs and operations.

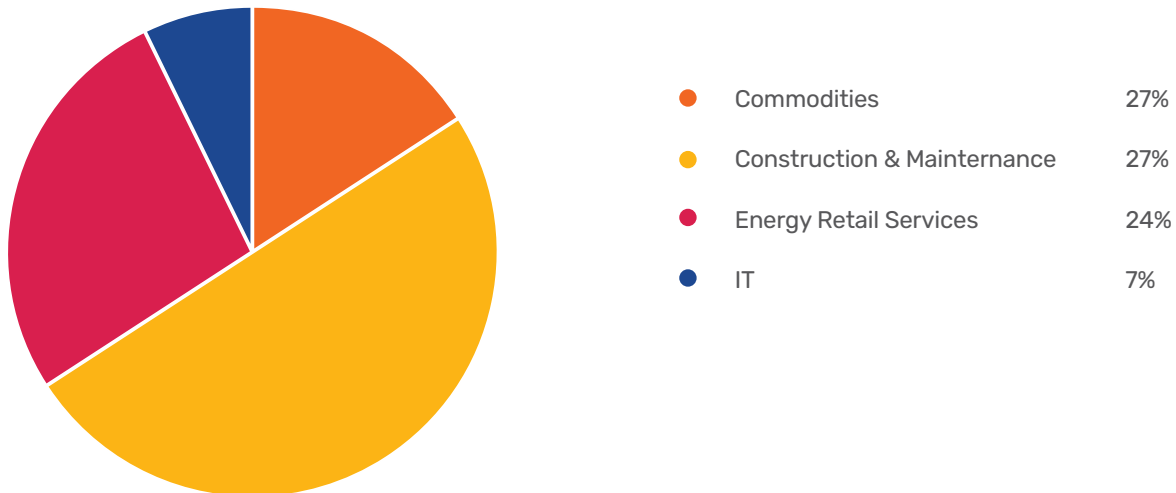
Tier 1 Suppliers



Tier 2 Suppliers



Tier 3 Suppliers



As evidenced by these pie-charts, our most significant supplier group is in relation to procurement of wholesale energy and gas. Our Tier 1 suppliers represent 90% of our total spend.

We have carefully selected each of these energy suppliers to offer a range of competitive and accessible goods and services. 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. However, we recognise the importance of conducting thorough due diligence to ensure that the risks of modern slavery at higher levels of the supply chain are effectively managed.

Similarly, as the majority of these suppliers are in connection with wholesale energy, we have elected to also focus our more detailed supplier assessment on the Tier 2 suppliers as we consider this to be where the risk lies in relation to the procurement of goods for construction and maintenance.

We have elaborated on this further in our section on our potential supply chain risks.



Potential modern slavery risks in our operations and supply chain

As part of our commitment to ethical business practices and social responsibility, Energy Locals takes a proactive approach to identifying and mitigating key risks within our operations and supply chains.

We have developed a comprehensive risk assessment framework as demonstrated in the following flowchart. This flowchart outlines the key steps we take to systematically assess, identify, and address potential risks related to modern slavery and other ethical concerns in our business operations and supply chain.



We have outlined below the actions taken in the reporting period to prevent modern slavery under each element of our Risk Assessment Framework.

1. Design - implementing an effective modern slavery framework

a. 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.

We closely monitor the Global Slavery Index which provides us with a detailed picture of modern slavery as it exists across industries and countries today.

The Global Slavery Index enables the Energy Locals Group to understand and identify key risk areas based on global trends that may be relevant to our own supply chains.



**High-risk
geographies**



**High-risk business
models**



**Vulnerable
populations**



**High-risk
procurement
strategies**





b. Governance

The Energy Locals Group's Compliance function is responsible for identifying and managing risks, compliance obligations and other issues relating to our modern slavery obligations. The Compliance function reports directly into the Energy Locals Group's executive leadership team and provides updates to the Energy Locals Group Board of directors when relevant.

Our legal and compliance teams are responsible for ensuring that all relevant stakeholders in the business understand modern slavery risks.

c. Policies

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

Our policies include:

Modern Slavery Policy

This policy, which was reviewed and 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 contains standards of behaviour that are expected of employees of the Energy Locals Group.

Supplier Code of Conduct

The Supplier Code of Conduct, which was reviewed and updated in the reporting period, 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.

Workplace Health and Safety Policy

This policy serves as a guiding document that establishes the Energy Locals Group's dedication to preserving the well-being of its workforce, preventing workplace accidents, and ensuring compliance with health and safety regulations.

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

2. Assess - understanding key risk areas

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

From this risk assessment, we concluded that the overall risk of modern slavery within the Energy Locals Group's operations and supply chain is low. 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.¹

The Energy Locals Group acknowledges that the possibility of modern slavery cannot be entirely ruled out and may exist within the broader supply chains and in connection with our procurement of solar panels.

We are committed to continually monitoring potential risks and reviewing our internal policies and practices to ensure ongoing compliance. A key way of minimising this risk is via assessing each high-risk supplier.

¹ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>



a. Procurement of goods

While we do not have any direct relationships with suppliers in potential high-risk geographic locations, we do procure some products and services which can be considered high risk for modern slavery.

The Energy Locals Group acknowledges this risk and has created, and maintains, a list of ‘blacklisted’ suppliers, which the Energy Locals Group refrains from procuring materials from, particularly renewable energy materials. This blacklist includes all suppliers that we are aware of operating in the Uyghur region.

The goods procured by the Energy Locals Group that are high risk based on these sources are:

Product	Risk
Solar Panels	Solar panels remain within the top five at-risk of modern slavery products for Australia due to the need for a silica-product (polysilicon) derived from quartz sand. China is the market leader in polysilicon production and in 2021 about 45 percent of the world’s polysilicon supply originated from the Uyghur region. Forced labour permeates all businesses operating in Uyghur region, including those that are part of the solar panel supply chain, from the collection of raw quartz and its purification into solar grade polysilicon to its transformation into ingots, wafers, cells, and eventually solar panel modules. ²
Batteries	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.
IT Equipment	Electronics remain the highest value at-risk important for the majority of G20 countries, worth an estimated US\$243.6 billion. ³ Laptops, computers and mobile phones are within the top five at-risk products for Australia.

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 operations in the construction sector are heavily based on outsourcing, which increases the complexity of operations and supply chains and 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.

² Walk Free, *Global Slavery Index 2023*, <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>, p 149,

³ *Ibid.*

Our risk assessment has demonstrated that modern slavery risks may arise in respect of procurement of the following services:

Product	Risk
Cleaning	As a sector, cleaning is considered high-risk for modern slavery and exploitation due to the complexity of the industry, the nature of the workforce, and the often-opaque nature of operations.
Construction labour	The Energy Locals Group engages contractors in the construction industry to support with the installation and maintenance of equipment. Due to the construction industry's highly competitive and cost-driven bidding process, social risks (including modern slavery and other human rights issues) are rarely prioritised in procurement risk frameworks.

c. Supplier due diligence processes

Modern Slavery Risk assessment is embedded in the Energy Locals Group decision-making processes. Prior to the engagement of any major or high-risk suppliers a modern slavery risk assessment is conducted. We deem major suppliers to be those with an annual spend of over \$500,000.

We typically require new suppliers to complete a detailed modern slavery questionnaire prior to the selection of major third-party providers, whether it be at the tender evaluation stage, the onboarding of a new supplier, regular reassessment of an ongoing supplier, or the assessment of an investment opportunity.

Our supplier due diligence process is a crucial component of our commitment to ethical and responsible sourcing. We conduct a thorough evaluation of potential and existing suppliers to ensure they align with our sustainability and ethical standards. As part of this process, we utilise a modern slavery questionnaire designed to assess and mitigate the risk of forced Labour and human trafficking in the supply chain. This questionnaire is a comprehensive tool that requests information from suppliers regarding their labour practices, recruitment procedures, and adherence to international labour standards.

Preliminary due diligence

The responses provided by suppliers are meticulously reviewed to identify any red flags or areas of concern. Based on this assessment, preliminary due diligence is performed on major or assessed high risk third parties and seeks to assess modern slavery risk in the early stages of scoping out whether or not to:

- Onboard a new supplier;
- Continue with an existing supplier at contract renewal point;
- Progress particular bidders in the tender evaluation process; or
- Progress investment opportunities.

A comprehensive multi-stage process is implemented in preliminary due diligence to assess the risk profile of a third party, including policy review, desktop searches, as well as geographic and sectoral exposure assessments.

If the party receives a low preliminary risk profile, the third party can be progressed to the decision-making process. A medium or high preliminary risk profile, however, necessitates detailed due diligence assessment.

Detailed due diligence

Detailed due diligence entails providing the third-party organisation with a detailed modern slavery questionnaire and related FAQs, requesting its completion and submission within a specified timeframe. The Energy Locals Group will also conduct further desktop searches using any additional search portals/ subscription sites/resources that were not previously made available during the preliminary due diligence. After this additional information and documentation gathering, a final risk rating is assigned to the third party.

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, there is a greater likelihood that actual harm is being experienced and we look to implement additional controls to ensure that risk does not become harm.

Findings assessed to be high risk (or at times all levels of risk) will then be raised to the Board, where it is elected that suppliers may be taken further in the tender process, whereupon a decision will be made on a case-by-case basis by the Board and external advisers as to whether the consideration of the third party should be discontinued. While ongoing purchases are relatively limited in the business, engaged third parties will be subject to the ongoing risk assessment and management processes outlined in the section above.





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.

After the preliminary risk assessments performed on suppliers, the Energy Locals Group have 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

We have implemented training and provided resources to key high-risk functions within the business, such as procurement, asset delivery and leadership, on supply chain risks and supplier due diligence strategies.

The Legal and Compliance teams have undertaken a knowledge building exercise to ensure that those teams have a strong understanding of relevant local and international regulations, standards and legal requirements applicable to modern slavery risks in the Energy Locals Group's supply chains.

b. Reporting mechanisms

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

Supplier Code of Conduct

New and existing contracted suppliers are required to comply with our Supplier Code of Conduct and demonstrate their commitment to doing so.

The code outlines clear expectations 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.

Suppliers who engage sub-contractors while providing goods or services to us must 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 code is used as part of our supplier evaluation, selection, and contract management process. This is complemented by a modern slavery questionnaire which is completed by suppliers as part of the procurement process.

When a supplier does not meet our requirements, corrective action plans may be established and monitored for progress. We may terminate the relationship or seek other courses of action with suppliers that violate our code and are suspected of committing any human rights violations.

Contractual Clauses - Procurement Contracts

We ensure that modern slavery obligations are a contractual commitment.

Our asset delivery team (responsible for procurement) already work hand in hand with members of our Legal department and the Compliance function to ensure that our contracts appropriately manage supply chain risk.

We have included clauses expressly requiring supplier compliance with modern slavery and anti-bribery/anti corruptions laws and our Supplier Code of Conduct in our template contracts and purchase terms. To the extent they are not already included, we are working to have these requirements included in executed supplier contracts wherever possible.

When reviewing contractual documents prepared by a third-party supplier, we ensure that modern slavery obligations are included.



4. Remediation - responding to modern slavery

In preparation for potential identification of modern slavery risks within our operations and supply chain, our approach to remediation involves a proactive and comprehensive strategy. Should any risks be identified, our immediate response prioritises engaging with affected parties, including works and local communities, to swiftly offer support and resources.

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 unwilling to address modern slavery concerns and there is no reasonable expectation of change, we will consider ending the supply relationship.

Thankfully, we have not yet identified any instance which requires remedial action.

5. Monitor and review - assessing the effectiveness of our actions

a. Reviews of human resources processes

As part of our ongoing efforts to address and mitigate the risk of modern slavery within our operations, we have carefully evaluated our recruitment processes, employee engagement strategies, and remuneration practices.

In terms of employee engagement, we have implemented strategies designed to foster a supportive and open environment, one that encourages employees to report any concerns or signs of modern slavery. This approach is integral to cultivating a culture of awareness and vigilance throughout the organisation.

Regarding our remuneration practices, we have reviewed our pay structures to ensure that remuneration packages are competitive, transparent, and aligned with the correct employment awards, further supporting our commitment to ethical standards.

We recognise that the risk assessment process must be continually updated to remain effective. The dynamic nature of our business operations and the evolving global landscape of modern slavery necessitate a flexible and adaptable risk management framework.



b. Enabling reporting mechanisms

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

c. Continual assessment

The Energy Locals Group consistently monitor the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to or is directly linked to. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by:

- Tracking our actions and outcomes;
- Partnering with suppliers and other external partners; and
- Undertaking regular internal governance and external assurance processes.

Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

Through **regular reviews and updates**, we aim to swiftly respond to changes in our supply chain, operational practices, and emerging trends in modern slavery. This ongoing evaluation will include refining our risk indicators, monitoring mechanisms, and evaluation criteria to ensure that our approach remains relevant and effective in addressing potential risks. By maintaining an agile and proactive risk assessment process, we can better protect human rights within our supply chain and ensure that our strategy remains robust and responsive to emerging challenges.

d. Key performance indicators

In addition to continuing to monitor the effectiveness of our controls, we will use key performance indicators to measure how effective our actions to identify and address modern slavery practices in any part of our operations and supply chain have been.

Governance / Consultation and approval

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

The Board of directors of each Energy Locals Reporting Entity approved the contents of this statement and for the Chief Executive Officer of the Energy Locals Groups to sign this statement on their behalf on the dates set out below:

Reporting Entity	Date of Approval
Energy Locals Pty Ltd (ACN 606 408 879)	27 November 2024
Energy Locals BTR Pty Ltd (ACN 664534 098)	10 December 2024
Energy Trade Pty Ltd (ACN 165 688 568)	27 November 2024
Strata Services Corporation Pty Ltd (ACN 622 568 718)	6 December 2024
Strata Energy Services Pty Ltd (ACN 622 570 156)	6 December 2024
Strata Renewable Energy Pty Ltd (ACN 637 530 235)	6 December 2024



Appendix A – Energy Locals Reporting Entities

- Energy Locals Pty Ltd (ACN 606 408 879)
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- Strata Renewable Energy Pty Ltd (ACN 637 530 235)



Appendix B – Mandatory Criteria

Mandatory Criteria	Page number(s)
Identify the reporting entity	Page 4 and Appendix A.
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 10-16.
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 16-21.
Describe how the reporting entity assesses the effectiveness of these actions.	Page 21-22.
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 23.





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