

**MODERN SLAVERY STATEMENT  
FY2025  
ACLE Services Pty Ltd**

Approval by Principal Governing Body and Signature of Responsible Member

This Modern Slavery Statement for the period 1 July 2024 - 30<sup>th</sup> June 2025 was approved by the Directors of ACLE Services Pty Ltd, the principal governing body of the reporting entity, on 29<sup>th</sup> April 2026.

Signed on behalf of the Board by a responsible member of ACLE Services Pty Ltd:



Brenton Moratto  
Director  
ACLE Services Pty Ltd

**Annexure A - Mandatory Reporting Criteria**

Criterion	Requirement	Where addressed
1	Identify the reporting entity	Section 1
2	Describe the structure, operations and supply chains of the reporting entity	Section 2
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	Section 3
4	Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Section 4
5	Describe how the reporting entity assesses the effectiveness of those actions	Section 5
6	Describe the process of consultation with entities the reporting entity owns or controls	Section 6
7	Include any other relevant information	Section 7
-	Principal governing body approval and signature of responsible member	Approval page

## 1. Reporting entity

The reporting entity for this statement is ACLE Services Pty Ltd.

This statement also covers ACLE Services Pty Ltd's controlled entity:  
ACLE Solutions Pty Ltd

For the purposes of this statement, references to **ACLE, we, our** and **us** refer to ACLE Services Pty Ltd and where relevant, ACLE Solutions Pty Ltd.

## 2. Our structure, operations and supply chains

ACLE is an Australian engineering, procurement, construction and operations and maintenance business supporting renewable energy and related infrastructure projects, including solar farm and battery energy storage system (BESS) projects. ACLE's operations during FY2025 included project delivery, engineering, procurement, construction, site-based activities, commercial and corporate support functions. ACLE also engaged subcontractors, suppliers and service providers to support these activities.

During FY2025, ACLE had up to 145 employees during peak construction. ACLE's supply chains include the procurement of goods and services required to support corporate operations and project delivery. Key supply chain categories include:

- labour hire and subcontracted site labour
- electrical, civil and specialist construction subcontractors
- solar panel / photovoltaic module suppliers
- battery cell, battery container and broader BESS component suppliers
- structural steel and other manufactured construction inputs
- cables, wiring and other electrical components
- plant and equipment
- uniforms, PPE and workwear
- technology, software and professional services
- other operational and site services

ACLE primarily contracts with Australian suppliers and subcontractors at the first tier. However, we recognise that some of those suppliers source goods, materials and components through international supply chains, which can reduce visibility beyond direct suppliers and increase the risk of modern slavery occurring deeper in the supply chain. This is particularly relevant in relation to imported manufactured products and components used in renewable energy and construction projects.

### **3. Risks of modern slavery in our operations and supply chains**

ACLE recognises that modern slavery can occur in many forms, including forced labour, deceptive recruitment, debt bondage, servitude, child labour and human trafficking. Modern slavery risks may arise both in an entity's own operations and in its supply chains, particularly where there are complex subcontracting arrangements, labour-intensive activities, offshore manufacturing or reduced transparency beyond direct suppliers.

Based on the nature of ACLE's business, we consider the risk of modern slavery in our direct Australian employee workforce to be lower than in some areas of our supply chain, due to the legal and regulatory environment in which we operate and our internal employment practices. However, we recognise that risk may still arise using labour hire, subcontracted labour and third-party service arrangements.

During FY2025, ACLE identified the following supply chain categories as presenting the highest potential inherent risk of modern slavery:

- labour hire providers and subcontracted site labour
- solar panel / photovoltaic module suppliers
- battery cell, battery container and broader BESS component suppliers

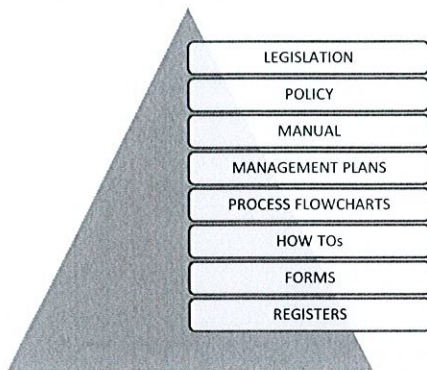
These categories may carry elevated risk due to labour-intensive work, subcontracting arrangements, offshore manufacturing, multi-tier supply chains and reduced visibility beyond direct suppliers. ACLE also recognises that broader construction and project delivery supply chains can present elevated risk where goods or services are sourced indirectly through lower-tier suppliers.

### **4. Actions taken during FY2025 to assess and address modern slavery risks**

During FY2025, ACLE continued developing its approach to identifying and managing modern slavery risk. As this is ACLE's first Modern Slavery Statement, our actions during the reporting period were focused on establishing foundational governance, contractual controls and initial due diligence tools.

#### **Policy framework**

ACLE's Modern Slavery Policy sits within its broader Integrated Business Management System and is intended to support how ethical and sustainable requirements are communicated, implemented and monitored across project delivery and supply chain activities. The policy forms part of ACLE's broader Integrated Business Management System (**IBMS**).



### **Contractual controls**

During FY2025, ACLE included modern slavery or ethical sourcing clauses in supplier contracts, subcontracts, purchase orders and tender documents. These contractual controls formed the primary procurement-based mechanism used in practice during FY2025 to communicate ACLE’s expectations in relation to modern slavery risk.

### **Slavery and Trafficking Risk Assessment (STRA)**

During FY2025, ACLE developed a Slavery and Trafficking Risk Assessment (**STRA**) form as an initial supplier risk assessment tool and maintained this within its IBMS. Although the STRA was not used in this reporting period, the STRA will become a key action item during the next reporting period. FY26 will focus on adoption of the STRA; initially for new and renewing suppliers and then progressively extend the process to existing and ongoing suppliers.

Once implemented, completed STRAs are intended to be reviewed by the Procurement Team and the Head of Pre Contracts and Supply Chain.

### **Other due diligence developments**

Other than contractual clauses, ACLE did not undertake further procurement due diligence activities specifically relating to modern slavery, labour practices or ethical sourcing during FY2025.

After the end of the FY2025 reporting period, ACLE implemented Avetta in November 2025 as part of the next phase of strengthening supplier prequalification and due diligence processes. As this occurred after 30 June 2025, ACLE does not describe Avetta as an action taken during FY2025. However, its implementation is relevant as a post-period development that is expected to support more structured supplier screening and risk management in future reporting periods.

## **Grievance and remediation framework**

ACLE is committed to the protection and respect of human rights across its operations and supply chains. ACLE has internal procedures through which employees and workers can raise concerns regarding misconduct or inappropriate behaviour. Where ACLE identifies conduct that may indicate modern slavery risk, ACLE intends to assess the matter and determine an appropriate response, which may include further supplier engagement, additional due diligence, corrective actions or other remedial steps proportionate to the issue identified.

No issues, concerns or grievances relating to modern slavery were raised with ACLE during FY2025. ACLE recognises, however, that the absence of reports does not necessarily indicate the absence of risk.

### **5. How we assess the effectiveness of our actions**

ACLE's approach to assessing effectiveness is still developing.

As a first reporting entity, ACLE's initial focus is on building the core controls needed to identify and manage modern slavery risk more systematically. In the near term, ACLE expects to assess effectiveness primarily through process measures, including monitoring:

- rollout of the STRA process
- supplier coverage under the STRA, beginning with new and renewing suppliers
- whether higher-risk supply categories are being identified and prioritised
- whether contractual modern slavery clauses continue to be used consistently
- whether relevant employees receive modern slavery awareness through induction and related communication
- whether any concerns or issues relating to modern slavery are raised and how they are addressed
- the implementation and use of supplier screening and pre-qualification tools, including Avetta, in future reporting periods

Over time, as these controls become more embedded, ACLE intends to strengthen its assessment of effectiveness through broader outcome measures.

During FY2025, ACLE had limited data available to measure effectiveness quantitatively. This reflects the early stage of ACLE's modern slavery framework and implementation, rather than an absence of focus on effectiveness. ACLE expects its ability to assess effectiveness to improve as the STRA process is rolled out and supplier due diligence processes mature.

## **6. Consultation with controlled entity**

ACLE Services Pty Ltd consulted with its controlled entity, ACLE Solutions Pty Ltd, in preparing this statement.

Consultation occurred through circulation of the draft statement to senior managers across the relevant entities for review, comment and input. This consultation informed the description of ACLE's operations, supply chains, risks and current controls.

This approach reflects ACLE's first reporting cycle and is intended to support more structured consultation in future reporting periods.

## **7. Other relevant information and future priorities**

FY2025 is ACLE's first reporting year under the *Modern Slavery Act 2018 (Cth)*. ACLE recognises that its approach to managing modern slavery risk is at an early stage and that further work is required to strengthen both due diligence and effectiveness measurement.

ACLE's key priorities for the next phase of implementation are to:

- roll out the STRA, with an initial focus on new and renewing suppliers and a risk-based expansion over time to existing and ongoing suppliers
- strengthen supplier due diligence processes over time, with priority given to higher-risk supplier categories
- embed the use of Avetta within supplier prequalification and screening processes
- continue embedding modern slavery awareness within induction and internal governance processes
- strengthen internal reporting and escalation pathways, including through the introduction of a Whistleblower Policy and process relevant to suspected modern slavery risks
- improve record keeping and reporting to support future statements

ACLE is committed to continuing to improve its understanding of modern slavery risk and to taking practical, proportionate and risk-based steps to strengthen its controls over time.

## **Circular Resolution of Directors**

Approval and Authorisation of 2025 Modern Slavery Statement

Company: ACLE Services Pty Ltd (ACN 631 910 659)

Date: 29<sup>th</sup> April 2026

This circular resolution is made pursuant to the *Corporations Act 2001* (Cth) and the Constitution of the Company.

### **Background**

1. The Company became a reporting entity under the Modern Slavery Act 2018 (Cth) (**Reporting Entity**) following the 2024-25 financial year, as the Company's consolidated revenue exceeded the reporting threshold of \$100 million.
2. As a reporting entity, the Company is required to prepare, approve and lodge a Modern Slavery Statement with the Attorney-General's Department (**AGD**) via the Modern Slavery Statements Register.
3. The directors have reviewed the Company's proposed Modern Slavery Statement for the reporting period ending 30 June 2025, annexed to this resolution as Annexure A.
4. The directors are satisfied that the Modern Slavery Statement addresses each of the statutory criteria in section 16(1) of the *Modern Slavery Act 2018* (Cth):
  - a. identifies the Company as the reporting entity;
  - b. describes the Company's structure, operations and supply chains;
  - c. describes the risks of modern slavery practices in the operations and supply chains of the Company and ACLE Solutions Pty Ltd (ACN 666 626 428) (**ACLE Solutions**) as an entity that the Company owns and controls;
  - d. describes the Company's and ACLE Solutions' actions to assess and address these risks, including due diligence and remediation processes;
  - e. describes how the Company assesses the effectiveness of such actions;
  - f. describes the process of consultation with ACLE Solutions; and
  - g. includes all other information that the Company considers relevant.
5. The directors intend to review and approve the Company's 2026 Modern Slavery Statement following the end of the 2025-26 reporting period and to authorise its lodgement prior to the applicable deadline.



## Resolution

It is resolved that:

1. The Modern Slavery Statement for the reporting period ending 30 June 2025, annexed as Annexure A, is approved for the purposes of the *Modern Slavery Act 2018* (Cth).
2. Any director of the Company is authorised to sign the Modern Slavery Statement as a responsible member of the Company.
3. Any director or officer of the Company, or any member of the Company's Human Resources team, is authorised to lodge the Modern Slavery Statement, and this approving resolution if required, with the Attorney-General's Department or via the Modern Slavery Statements Register, and to do all things necessary or desirable to give effect to these resolutions.

This resolution may be executed in counterparts. All signed counterparts together constitute one instrument.

### Director Signatures:

Name: <u>BIN WANG</u>	Name: <u>BRENTON MORATTO</u>
Signature: <u></u>	Signature: <u></u>
Date: <u>29.04.2026.</u>	Date: <u>29.04.2026</u>