

Modern Slavery Statement 2025

+ Acknowledgement of Country

Collgar acknowledges the Traditional Custodians of the lands on which we operate, including the Whadjuk people and the Njaki Njaki people of the Noongar Nation. We recognise the continuing connection of First Nations peoples to land, waters, culture and community, and pay our respects to Elders past and present.

We acknowledge the unique place of Aboriginal and Torres Strait Islander peoples as the original custodians of this land and recognise that care for Country has been sustained for more than 70,000 years. We also recognise Australia's cultural diversity and the enduring contribution of First Nations peoples to the nation.



About this Report

This Modern Slavery Statement (the **Statement**) is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (the **Act**). It is a joint statement covering Collgar Wind Farm Pty Ltd (**Collgar**) and CWF Holdings Pty Ltd (**CWFH**) (collectively, the **Reporting Entities**), and describes activities carried out during the Reporting Period (1 July 2024 to 30 June 2025), to identify and mitigate modern slavery in our operations and supply chains.

References to the **Collgar Group**, we, us, our and similar expressions refer to CWFH and its subsidiaries; Collgar and Collgar Community Fund Pty Ltd, the trustee for the Collgar Community Trust. These entities are Australian proprietary companies registered in Victoria, with principal places of business in Perth, Western Australia. The Collgar Group is wholly owned by the Retail Employees Superannuation Trust (**Rest**).

CWFH and Collgar Wind Farm Pty Ltd are Reporting Entities for the purposes of the Act. Collgar Community Fund Pty Ltd is not a Reporting Entity, although it was consulted in the preparation of this Statement. Further information on consultation within the Collgar Group is available in the About Us section.

To provide feedback on this Statement, please [contact us](#). Grievance mechanisms are supported through our publicly available [Whistleblower Policy](#).

Reporting Entities

- Collgar Wind Farm Pty Ltd ACN 130 586 088
- CWF Holdings Pty Ltd ACN 142 083 323



A Message from our Chair and Chief Executive Officer

As Western Australia’s largest wind farm, Collgar remains committed to operating with integrity and responsibility - protecting the people, communities, and environments that support and surround our operations. Respecting and promoting human rights continues to be central to how we do business.

We recognise that every business has an important role to play in the global effort to address modern slavery. We acknowledge that this challenge is complex and that modern slavery often impacts the most vulnerable people hidden deep within supply chains.

During this reporting period we have continued to strengthen our response to modern slavery risks and remain committed to embedding responsible practices across our supply chain, respecting and protecting human rights – including the rights of First Nations peoples – and fostering a safe, inclusive and engaged workforce.

We recognise that modern slavery risks often manifest long before any incident becomes visible. By mapping these risks and understanding where vulnerabilities may arise, we aim to take early, informed steps that reduce the likelihood of harm occurring.

We have endeavoured to build stronger partnerships with our suppliers, peers, and experts to identify and address our modern slavery risks more effectively. We seek continuous improvement, ensuring that as we generate clean energy into the future, we also contribute to a more just and humane world.



Tony Iannello
Chair

CWF Holdings Pty Ltd
Collgar Wind Farm Pty Ltd

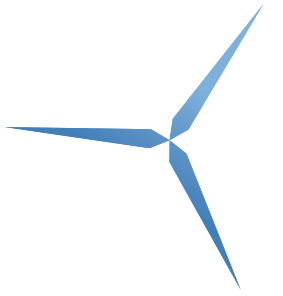


Sam Pearce
Chief Executive Officer

This Statement was approved by the Boards of CWF Holdings Pty Ltd and Collgar Wind Farm Pty Ltd on 11 December 2025.

Table of Contents

ABOUT THIS REPORT	3
A MESSAGE FROM OUR CHAIR AND CHIEF EXECUTIVE OFFICER	4
ABOUT US	6
+ Our Structure	6
+ Consultation	7
+ Our Operations	7
+ Our Supply Chain	8
TAKING ACTION	12
+ Operations	12
+ Supply Chain	12
+ Other Actions to Assess and Address Modern Slavery in our Business	15
+ Activities Undertaken in the Reporting Period	16
+ Our Plans Beyond the Reporting Period	17
RISKS ANALYSIS OF OUR OPERATIONS AND SUPPLY CHAIN	18
EFFECTIVENESS REVIEW AND CONTINUOUS IMPROVEMENT	20
+ Effectiveness Reviews	20
+ Collaboration	20
OTHER INFORMATION	22



About Us

OUR STRUCTURE

Collgar Group Entities	Description of Operations & Supply Chain
CWF Holdings Pty Ltd ACN 142 083 323	<p>CWFH is a holding company and its activities are limited to holding the investment and interest in Collgar on behalf of the ultimate shareholder. CWFH does not have any outward facing operations.</p> <p>All procurement for CWFH is limited to procurement of professional services in relation to the preparation and audit of the Collgar Group's annual consolidated financial statements, as required under the <i>Corporations Act 2001 (Cth)</i>. The procurement of these professional services is undertaken by the operating entity, Collgar, on behalf of the Collgar Group. For completeness, CWFH has no operations or supply chain of its own.</p>
Collgar Wind Farm Pty Ltd (Collgar) ACN 130 586 088	<p>Collgar is a wholly-owned subsidiary of CWFH and operates a wind farm located in Merredin, Western Australia.</p> <p>This Statement refers to the activities undertaken by Collgar to identify and mitigate the risks of modern slavery in the wind farm operations and supply chains.</p>
Collgar Community Fund Pty Ltd (CCF) ACN 155 359 443	<p>CCF is a wholly-owned subsidiary of Collgar, and its sole purpose is to serve as the Trustee of the Collgar Community Trust (CCT or the Trust). CCF's activities are limited to governing the approval of grants to fund local initiatives benefitting Merredin and surrounding communities. CCT grant funding is provided by Collgar.</p> <p>A high-level modern slavery risk assessment was conducted in relation to CCF's operating activities (i.e., grant giving). The assessment included consideration of the regional location of the grant recipients, the size of grants awarded, and the types of activities the funding supports. The Wheatbelt region of Western Australia has not been identified as a jurisdiction at higher risk for modern slavery. Grants from CCF are limited to \$10,000 and are not available to fund the types of activities which may attract higher exposure to modern slavery risks, like those with complex supply chains such as large-scale development projects, or to fund general operational costs or capital works.</p> <p>CCF does not meet the definition of a Reporting Entity under the Act, does not have a supply chain of its own, and has been assessed as having a very low risk of modern slavery practices due to the nature of its activities. As such, the CCF is not treated as a Reporting Entity for the purposes of disclosure under this Statement.</p>

CONSULTATION

The Collgar Group's Board of Directors has oversight of ESG matters – including modern slavery risks and mitigation practices – as reflected in its Charter and in the mandates of its committees and other related delegations. As such, each entity is aware of the Act's reporting requirements and our plan for addressing these requirements. The Collgar Group entities, including each of the respective boards and senior leadership, have been consulted and provided with relevant materials and updates, and given the opportunity to participate in the preparation of this Statement.

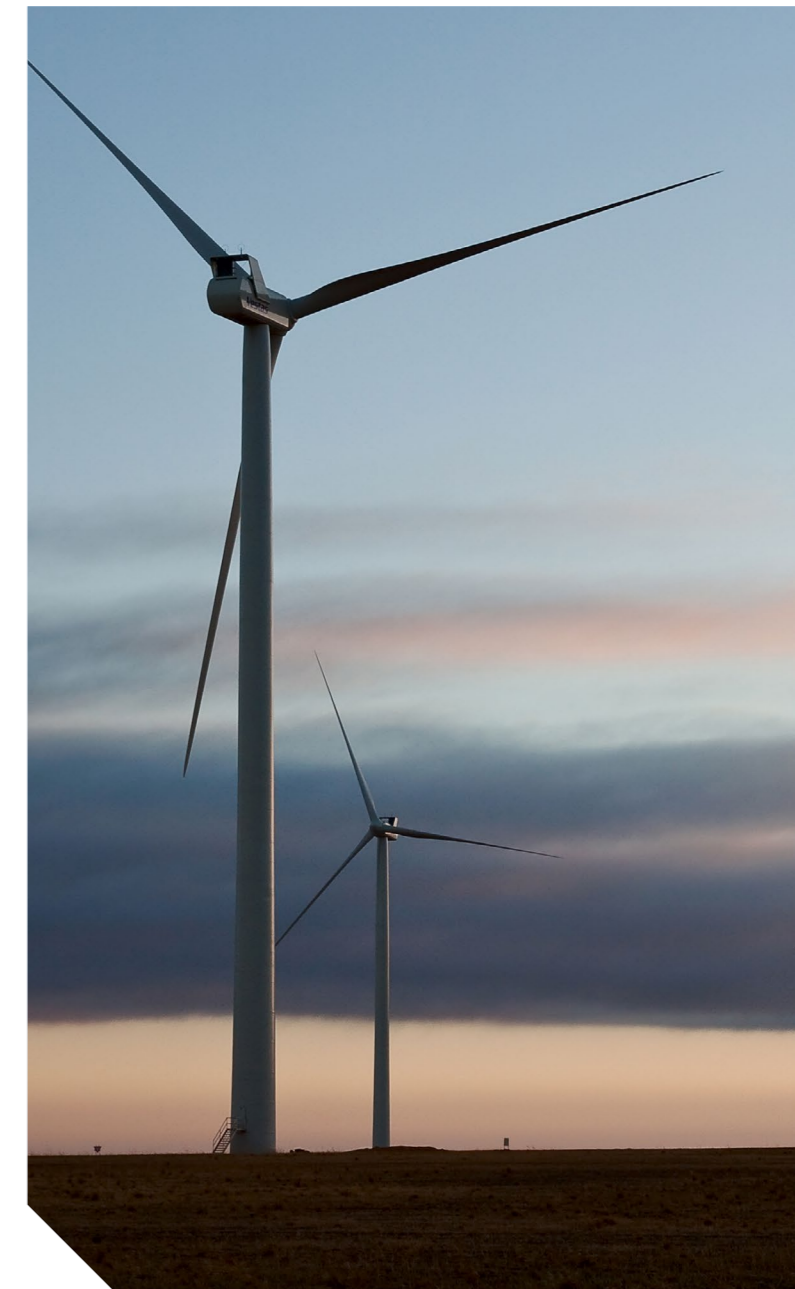
This Statement provides a single, consolidated description of our actions to address modern slavery risks.

OUR OPERATIONS

Collgar is in the business of generating and selling renewable energy via the operation of a wind farm in Merredin, Western Australia. Our primary operating activities include management of the wind farm's operations and maintenance activities, wind energy generation, and energy trading into the wholesale electricity market.

Built over a land envelope of 18,000 hectares (on land leased to the project by Merredin farmers), the wind farm is the largest wind power generator in Western Australia by installed capacity.

The Collgar Group has no direct employees. Collgar outsources its management services to a related body corporate, Collgar Renewables Pty Ltd (**Collgar Renewables**). While Collgar Renewables is not owned or controlled by the Reporting Entities and is not itself a reporting entity under the Act, the same individuals act as directors and officers of Collgar Renewables and the Collgar Group entities covered by this Statement.



OUR SUPPLY CHAIN

Service Providers

Most of our procurement spend is attributed to key outsourced technical and professional service providers for the following services:

- Operation and maintenance of the wind farm
- Management services, as described above and provided by Collgar Renewables
- Operation and maintenance of the South West Interconnected System
- Professional consulting (e.g., legal, technical and financial)

We find value in developing and maintaining long-term, stable relationships with our key service providers. The majority of our key service providers are located in Western Australia or, in some instances, elsewhere within Australia. Although some of our suppliers operate on a global scale, the majority of our interactions are with their local service teams.

The above represents a large proportion of the procurement activity by spend, but we also engage many suppliers who operate as micro-businesses or sole traders, including from rural regions near the wind farm.

Goods

Our supply chain includes the manufacture and transport of equipment, parts and components used in the operation and maintenance of the wind farm, such as gear boxes and specialty electronic hardware. We also procure smaller value goods, such as personal protective equipment. In this context, our supply chain includes the overseas facilities where these goods are manufactured and the transport and delivery channels to our site.

We also recognise that our supply chain includes the products and services used by our suppliers in the provision of goods and services to us. Using the above example, our supply chain is further extended to include the mining and refining of raw materials used in the provision of electronic componentry to produce the specialty electronic hardware.

Some of our services are outsourced to key suppliers who provide a permanent workforce solely dedicated to our business. In that context, our supply chain also includes items used by those workers, such as laptops and other personal electronic devices.

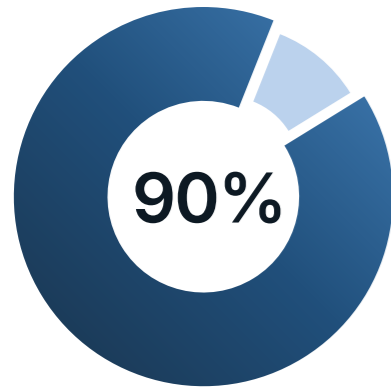




Our Operations & Supply Chain

SUPPLY CHAIN

12 suppliers made up 90% of total procurement spend



39%

Construction and Maintenance Service (on-site)

Technical contractors located in Australia, with the majority of goods manufactured in Denmark or sourced from Germany, UK, Spain, Russia, Italy, Turkey, China, India, USA, Argentina, Brazil or Mexico

21%

Professional and Financial Services

Suppliers providing professional services across insurance, lending, banking, legal and audit. These professional advisors are all based in Australia

19%

Management Services

Collgar Renewables employees are located in Western Australia

10%

Utilities Services Provider

South West Interconnected System (SWIS) located in Western Australia

1%

Electronic Equipment (mostly voltage regulation equipment)

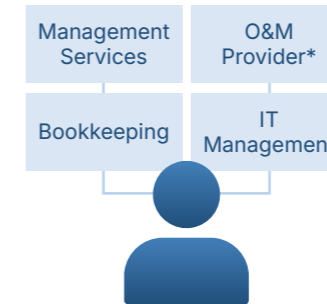
Through its "Conflict Minerals Report", the supplier has disclosed that materials used in its products may originate in the Democratic Republic of Congo (DRC) or certain countries that share an internationally recognised border with the DRC, including the Republic of the Congo, Angola, Burundi, Central African Republic, Rwanda, Tanzania, Uganda, and Zambia

TEAM

ZERO



Direct Employees



Long-term Outsourced Service Providers

(majority of workforce in Australia with most contractors located in Western Australia*)

OPERATIONS

Registered Office
Perth, WA

Wind Farm Operations
Merredin, WA

- Renewable energy generator connected to WA's SWIS
- 111 Vestas V90 2.0MW wind turbine generators with a total power production capacity of 222MW
- Generates an average of 660 gigawatt hours (GWh) per year¹, supplying the equivalent annual electricity needs of more than 144,000 Western Australian households²

CUSTOMER BASE

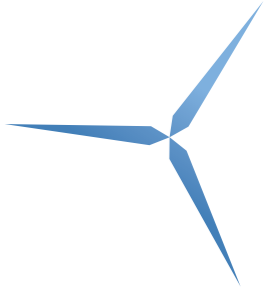
Collgar Wind Farm supplies renewable energy to the wholesale electricity market as part of an offtake agreement



¹CWF net generation measured at the meter, averaged over FY16-25.

² Source: Average electricity usage of WA households (12.58kWh/day, for households with more than two adults and no children.)
[What is the Average Electricity Bill in Perth WA? - Synergy](#)

*The O&M service provider directly employs a team to service the wind farm assets. These employees are located in Western Australia and perform these duties on site in Merredin. Some activities undertaken by the O&M service provider, including in relation to SCADA control, technical and engineering expertise, and product development are monitored and maintained globally in the following regions: Australia, Denmark, and India.



Taking Action

OPERATIONS

Direct Workforce

During the Reporting Period, we did not directly employ a workforce. However, Collgar Renewables is critical to our ongoing operations, and we consider the health, safety and welfare of its workforce to be paramount to our long-term success. Therefore, we have assessed whether our operations may create a risk of modern slavery practices impacting Collgar Renewables' direct workforce.

- **Geography** – 100% of the direct workforce is located in Western Australia, which is a low risk location.
- **Industry** – while ours is technically an outsourced business model, this does not present an increased risk to us. Sharing ultimate ownership and having the same Board of Directors and senior management as Collgar Renewables ensures alignment of values and alleviates any potential lack of visibility in the workforce. Under the Services Agreement, Collgar is also required to carry out the services in accordance with our policies and standards, including those in relation to modern slavery risk management.
- **Services** – Collgar Renewables has a low risk workforce profile made up of qualified professionals.

Assessment

After considering the characteristics of Collgar Renewables' workforce against the contractual arrangements and degree of visibility and control we have over workplace practices, we have assessed the risk of our operations causing modern slavery practices as low.

SUPPLY CHAIN

Since 2019, we have worked with external modern slavery consultants, SD Strategies, to help us understand modern slavery risk factors in our supply chain. Our supply chain risk analysis has become a foundational tool for identifying areas in our supply chain where we may be linked to modern slavery practices.

For the Reporting Period, we identified 100 direct-spend suppliers, with ~90% of total procurement concentrated across 12 suppliers (Large Suppliers) in the spend categories of:

- Construction and Maintenance services (on-site)
- Management Services
- Professional and Financial Services
- Utilities Services Provider
- Electronic Equipment (mostly voltage regulation equipment)

Low Spend Suppliers (the remaining 88 suppliers) represent a higher proportion of suppliers by number but present a different risk profile than our Large Suppliers. As such, we take a different approach to assessing suppliers identified in these two categories of our supply chain.

Overall, our supply chain analysis suggests that our greatest risk exposure is the procurement of goods rather than services. While we will continue to undertake due diligence activities of our service providers to assure ourselves that hired contractors and labourers are not at risk of exploitation, our bigger challenge is mitigating the risk that we may be linked to modern slavery practices as a result of the goods we procure.

We are committed to collaborating with our suppliers to increase transparency in our supply chains and working together to take action to identify and implement strategies to mitigate the risk of modern slavery practices.

Large Suppliers

Once identified, Large Suppliers are prioritised against the four key modern slavery risk indicators (geography, industry, product and services)³ described on page 18.

Across the four key risk indicators, we identified the following spend categories as potentially high-risk for modern slavery:

- **Construction & Maintenance** is assessed as a high-risk industry sector due to the use of labour hire and sub-contracted workers. In addition, these services are high risk when they require manual labour. Our Large Suppliers also make use of sub-contractors to provide services to us which presents an additional risk due to lack of oversight of sub-contracting arrangements.
- Vestas – Australian Wind Technology Pty Limited (Vestas), the operations and maintenance service provider of the wind farm, accounts for >39% of spend.
- We have identified that Vestas' right to sub-contract all or a portion of the services provided under the O&M agreement may present a risk of worker exploitation.

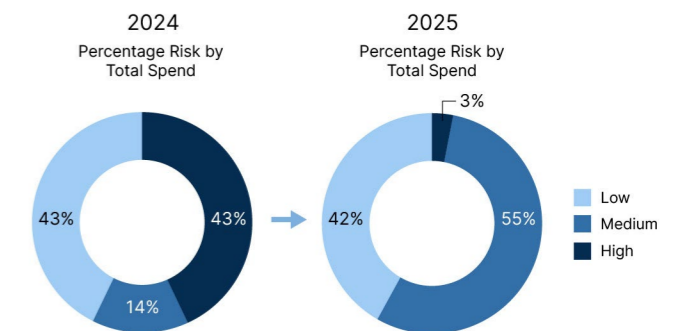
However, we have assessed this risk as low based on contractual mitigations, including that Vestas' right to sub-contract is subject to the terms and performance standards in the agreement, including that works must be performed safely and in compliance with relevant WHS laws.

In addition, the agreement also obligates Vestas to:

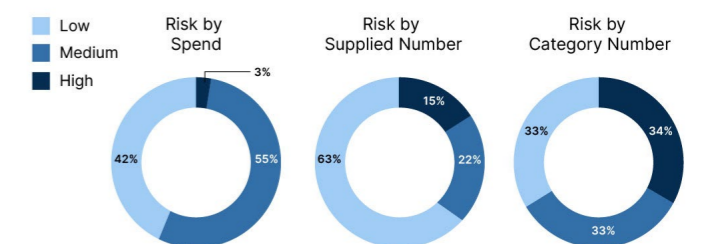
- (use reasonable endeavours to ensure that all suppliers in its supply chain including all subcontractors do not engage in any activity, practice or conduct that would constitute modern slavery; and
- (not use any goods or materials in connection with performing its obligations that it knows or should reasonably suspect have been sourced or made using modern slavery.

With the support of SD Strategies, we conducted a detailed due diligence assessment of Vestas in early 2025. Several improvement opportunities were identified, but despite being in a high-risk procurement category, Vestas was deemed to present a medium to low risk for modern slavery (see Case Study).

This exercise improved our understanding of the risks and allowed us to downgrade Vestas from being a Large Supplier in a high-risk procurement category, which reduced our total high-risk by spend to just 3% for FY25, with the majority of this risk being with our electronic component suppliers (see diagram below):



While our risk-by spend is significantly reduced, we acknowledge that modern slavery risks remain present in our supply chain, with 15% of our suppliers and 34% of our procurement categories posing potential risk for modern slavery. Further supplier due diligence assessments will help to determine the actual risks posed by our lower spend suppliers across higher risk procurement categories.



³As supported by international standards and guidelines such as the 2022 Global Slavery Index (GSI), 2022 Global Estimates of Modern Slavery Report and the US Department of Labor's 2022 List of Goods Produced by Child Labor or Forced Labor, and in conjunction with SD Strategies' risk tools developed from 13 global indices.



- **Plant and Equipment / Electronic Components** is assessed as a high-risk due to the geographic locations where raw materials may be sourced and/or manufactured, and the manner in which the goods are transported.

Our supply chain analysis shows that we predominantly use Australian suppliers. However, we know that the goods we procure often have complex supply chains where the source of materials and manufacturing can include a number of different countries, which may be higher risk for modern slavery. For example, two of our top suppliers of goods have implemented policies on conflict minerals which suggests their goods may be linked to modern slavery practices.

In response, we developed a critical minerals supplier questionnaire to enable disclosure of material sourcing practices to be considered in procurement and tender processes and anticipate rolling this out to our priority electronic component suppliers in FY26.

Our operating model makes use of third-party service providers to undertake regular, ongoing, and ad hoc work, both on site and in the Perth office. This type of indirect labour poses a more difficult risk assessment as there is often a lack of transparency into the people providing services.

Aside from Collgar Renewables, we also outsource provision of operations and maintenance, bookkeeping, and IT management services. These outsourced services account for 51% of total procurement spend.

With outsourcing arrangements, we have less visibility and control over how workers are engaged to perform these services and there may be a tendency to subcontract or make use of independent contractor models. We also recognise that with the competitive market and tight industry margins, workers in these categories may be more exposed to exploitation or unfair working environments.

Our analysis has concluded that the workers are professional in nature (e.g., accounting, ICT experts, engineers) and located in Western Australia, both of which are low risk factors.

We continue to issue contract terms and conditions that include robust modern slavery clauses and ensure limitations are placed on the use of sub-contractors.

Labour Hire, Consultants and Professional Advisors



Low Spend Suppliers

While a very small proportion of procurement is spent on goods and services from Low Spend Suppliers, this group represents 88% of our supply chain by supplier number.

For Low Spend Suppliers, we apply a category-based approach using the four key modern slavery risk indicators to identify higher-risk goods and services within this group. Where such categories are identified, we review our Low Spend Supplier list for exposure to these categories and determine whether additional due diligence or controls are warranted.

Also included in our Low Spend Suppliers category are micro businesses and sole traders, who are less likely to benefit from steady and predictable revenue. Customer behaviours put this type of supplier at greater risk of worker exploitation. For example, during periods of high demand, employees may be subject to poor working conditions amounting to forced labour, and during slow periods, or if customers fail to pay in reasonable timeframes, employees may have wages deferred or not paid at all.

To address this risk, we engage with our smaller suppliers to gauge their modern slavery awareness and maturity and seek to provide support for implementation of appropriate policies and risk management processes. We continue to participate in the "Payment Times Reporting Scheme", the purpose of which is to help ensure that small businesses receive timely payments for invoices issued to large enterprises, like us. We believe that education and awareness along with prompt payment of supplier invoices may reduce the likelihood of worker exploitation for small businesses.

OTHER ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY IN OUR BUSINESS

At the highest level, our Board is responsible for setting a culture that ensures we uphold Collgar's core values. The Board's Charter and Collgar's governance framework of policies and procedures articulate our commitment to protecting human rights and set expectations for risk management processes and reporting.

The following policies, frameworks and action plans enable a consistent approach to responsible and ethical business practices and protecting human rights generally.

- Code of Conduct
- Modern Slavery Policy (reviewed biennially, last reviewed and Board endorsed in March 2025)
- Modern Slavery Action Plan (updated annually)
- Raising Workplace Concerns
- Risk Appetite Statement
- Risk Management Policy and Framework
- Whistleblower Policy
- Work Health and Safety Policy and Management Plan

Comprehensive training supports the expectation that our people can identify, assess, and respond appropriately to modern slavery risks. As such, we collaborate with our key service providers to maintain transparency in our supply chain and to notify us of any actual or suspected instances of modern slavery. To support this, we expect key suppliers to ensure their teams have appropriate capability to identify and manage modern slavery risks. Where training programs are not already in place, we offer access to our in-depth modern slavery training (developed by SD Strategies) and continue to encourage uptake, with a view to incorporating training completion as a contractual requirement for key suppliers.

ACTIVITIES UNDERTAKEN IN THE REPORTING PERIOD

The following activities were undertaken during the Reporting Period:

- Conducted an in-depth modern slavery risk assessment of our O&M Service Provider, producing a risk-based report and corrective action plan (see Case Study). SD Strategies led the assessment in a manner aimed at building the capability of Collgar employees to independently undertake similar assessments for other key suppliers in the future.
- Prepared a bespoke Conflict Minerals Questionnaire to assess and mitigate the risks associated with conflict minerals in our supply chain. The questionnaire is designed to assess supplier awareness, policies, and practices relating to the ethical sourcing of minerals that may be linked to human rights abuses, including forced labour and modern slavery. The questionnaire covers areas such as supplier information, policy and commitment, supply chain transparency, reporting and compliance, risk management and mitigation, certification and assessments, and supplier declarations. It seeks to ensure suppliers have robust due diligence processes in place to identify, prevent, and address risks associated with conflict minerals in their operations and supply chains. Responses to the questionnaire will inform Collgar's broader responsible sourcing and modern slavery risk management framework following its implementation in FY26.
- Developed a Modern Slavery Questionnaire for suppliers based in China (or sourcing products from China), designed to assess the maturity of supplier governance systems, risk management processes, and employment practices in relation to human rights and modern slavery. The questionnaire covers business operations, governance and due diligence, risk identification and management (including the risk of Uyghur forced labour), employment and labour rights, and grievance and remediation mechanisms. We will request that all China-based suppliers complete the questionnaire and demonstrate modern slavery risk management and risk mitigation initiatives.

- The robust modern slavery provisions incorporated into our standard terms and conditions during the previous reporting period continue to be rolled out. We are identifying opportunities to review supplier compliance using our bespoke evidence checklist as new contracts commence, with plans to embed these reviews into our annual supplier review process.
- As in previous reporting periods, we continued to develop proportionate action plans to address identified risks within our supply chain. For example, we offer complimentary modern slavery training to suppliers with less mature systems to build awareness and strengthen their ability to manage risks effectively.
- Developed a draft Modern Slavery Grievance and Remediation Procedure which outlines how Collgar will identify, investigate, and respond to cases of Modern Slavery in our operations and supply chain. The draft procedure provides a five-step process for identifying and verifying harm and ensuring it is remediated, tracked, and prevented from happening again.
- Delivered online modern slavery training and awareness for new employees and contractors, with 15 personnel completing 65 modern slavery awareness training modules during the reporting period.
- Sourced refresher training for employees who completed our modern slavery training modules prior to 2023.



OUR PLANS BEYOND THE REPORTING PERIOD

We recognise that managing modern slavery risks is an ongoing process requiring continuous commitment and meaningful action.

We have identified the following focus areas for FY26:

- Roll out of our modern slavery information pack for micro business and sole trader suppliers designed to educate smaller businesses about modern slavery risks and provide practical steps for assessing and managing risks in their operations and supply chains.
- A Board briefing covering insights and outcomes since commencement of Australia's Modern Slavery Act, including an overview of the 2022 statutory review findings, the role of the Commonwealth Anti-slavery Commissioner, expected future changes, and recommendations for how we can prepare for these changes.
- We will seek Board endorsement of our commitment statement, which aligns with legislative expectations and the recommendations of the UN Guiding Principles on Business and Human Rights, which we then intend to publish on our website.
- Modern slavery training for 7 employees.

We have identified the following focus areas beyond FY26:

- Develop a risk-based procurement procedure embedding, among other items, supplier due diligence requirements.
- The draft Modern Slavery Grievance and Remediation Procedure will be reviewed by our SLT and presented to the Board for review.
- Undertake a structured gap analysis of current modern slavery reporting and management practices against the "Building Australia's Ambition and Impact: Strengthening the Response to Modern Slavery Strategic Plan" issued by the Office of the Australian Anti-Slavery Commissioner.
- Periodically review and refine our modern slavery action plan and roadmap to drive continuous improvement.
- Continue to review and report on modern slavery risk management initiatives.



Risks Analysis of our Operations and Supply Chain

As with all businesses operating within complex supply chains, there is a risk that our activities may be connected to modern-slavery practices. The actions we have taken during the reporting period are informed by a structured risk analysis designed to reduce our exposure. To support this process, we identify areas of our operations and supply chain where relevant risk indicators may be present:

- **Geography** – High-risk geographies include locations with weak rule of law, corruption, displacement, conflict, and limited state protection of human rights.
- **Industry** – Industry sectors may be high risk based on their characteristics, products and processes (e.g., extractives, electronics, and cleaning).

Sectors with labour-hire or outsourcing models may also present elevated risks.

- **Product** – Products, commodities and raw materials may be high risk depending on their production methods, including agriculture, manufacturing, mining.
- **Services** – Services may be high risk depending on how they are provided (e.g., requiring manual labour) or the workforce profile involved in providing the service (e.g., low-skill, vulnerable or migrant workers).



We have identified the following general types of modern slavery risks that may be relevant to our operations and supply chains.

Risk Category/ Risk Description	Specific Collgar Considerations	Actions Taken by Collgar to Mitigate/Limit the Risk
Risk of causing modern slavery practices: Where Collgar's own operations could directly lead to modern-slavery practices.	<ul style="list-style-type: none"> • Reliance on employment practices of outsourced service providers, who account for 69% of total procurement spend (nine of the top ten suppliers). • Two electronic-equipment suppliers manufacture goods in higher-risk jurisdictions. • A very small proportion (<0.05%) of spend relates to cleaning and catering, sectors that may involve temporary, foreign or low-skill workers performing work in low-visibility environments (night, remote areas). 	<ul style="list-style-type: none"> • Contractual requirements on service providers regarding fair-work compliance and employment standards. • Supplier screening, including review of employment practices and jurisdiction-specific risks. • Monitoring and reviewing high-risk, low-visibility service categories (cleaning/catering).
Risk of contributing to modern slavery practices: Where Collgar's procurement or commercial decisions may enable or incentivise risky practices.	<ul style="list-style-type: none"> • Operations and maintenance (O&M) services constitute the largest procurement spend and may involve subcontracting for specialist skills or capacity gaps. • Service providers may pursue efficiency-based subcontracting that increases risk for workers further down the chain. • Detailed due-diligence assessment completed in early 2025 reduced O&M provider's risk to low-medium. 	<ul style="list-style-type: none"> • External consultant-supported due diligence on O&M provider (2025). • Strengthened oversight of subcontracting, including disclosure expectations and performance monitoring. • Engagement with primary O&M provider on their subcontracting controls and worker protections.
Risk of being directly linked to modern slavery practices: Where modern-slavery risks occur in Collgar's broader supply chain (Tier 2+) outside direct control.	<ul style="list-style-type: none"> • Spare parts and technical components used for repairs and maintenance have complex multi-tier global supply chains with limited visibility beyond Tier-2. • Largest supplier of high-risk goods (1% spend) reports use of conflict minerals and potential sourcing from DRC or neighbouring countries. • Potential future use of China-based Tier-1 suppliers for new projects introduces additional risk due to opaque subcontracting and limited transparency. 	<ul style="list-style-type: none"> • Ongoing supply-chain mapping to improve visibility beyond Tier 2. • Review of supplier conflict-mineral disclosures and engagement on responsible sourcing expectations. • Awareness and monitoring of geopolitical risk for future Tier 1 suppliers (e.g., China) and their subcontracting models. • Integration of these findings into procurement planning for future projects.

Effectiveness Review and Continuous Improvement

EFFECTIVENESS REVIEWS

We use effectiveness reviews to understand if and how our action plan supports progress against our commitment to identifying, assessing and addressing the risks of modern slavery in our operations and supply chain. The reviews provide us with the ability to identify gaps in our program, build upon what is working and improve what isn't, and increase overall awareness to achieve better outcomes for those we engage with throughout our supply chain.

We continue to work on developing processes that will support actionable findings as to the effectiveness of our program, including:

Existing Processes

- **Emerging Risks:** our risk framework supports horizon scanning, particularly when new business activities are being explored, to ensure modern slavery risks have been considered in the context of the new activities
- **Supplier Engagement:** we have developed an evidence checklist which corresponds to our updated Terms & Conditions, which will enable us to understand supplier compliance with new clauses and develop supplier KPIs
- **Annual Benchmark Assessment:** enables year-on-year monitoring and progress beyond the action plan and identifies areas for further action
- **Performance Monitoring:** modern slavery training completion rate for key outsourced providers and broader supplier training completion rate
- **Tracking and Reporting:** progress against Modern Slavery Action Plan

Processes Under Development

- **Performance Monitoring:** review of broader corporate objectives to ensure they do not promote higher risk behaviours (e.g., lowest cost/rapid delivery demands on suppliers)

Board Review

Our Board reviews and approves our annual modern slavery statement, which provides a focused opportunity to engage with our Board on the effectiveness of our program. This affords the opportunity to explore additional recommendations as part of our ongoing commitment to address these risks.

COLLABORATION

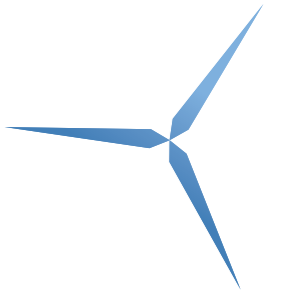
We recognise the need to work with our suppliers to increase collective education and awareness of modern slavery risks to supply chains and procurement practices.

We also recognise that the operating context of our various suppliers will influence their level of maturity and awareness in the modern slavery setting. Some of our suppliers are based overseas and have yet to progress the kind of due diligence required by Australia's *Modern Slavery Act 2018*.

To that end, we take a collaborative approach for engaging with our suppliers and try to support them where they are in their modern slavery maturity journey; our ability to undertake due diligence is only as meaningful as our supplier's ability to understand and respond to our questions. To ensure our suppliers have the tools to assess their own risks, we offer complimentary supplier training. In FY25 we developed practical guidance to support our SME suppliers to effectively identify and assess modern slavery risks in their operations and supply chain. We remain committed to rolling this out to relevant suppliers in FY26.

Through our own capability development journey, we have experienced the overwhelm and uncertainty of where to start and what to expect from supply chain due diligence processes. From this, we have learned that many suppliers have a desire to move the needle on modern slavery practices. We've recognised this shared purpose as an opportunity to engage and share best practices, and where reasonable, we will continue to collaborate in an effort to mitigate the risk of modern slavery throughout our supply chain.





Other Information

Case Study: High Risk Supplier Due Diligence Review

With the support of our external modern slavery consultant, we conducted a detailed due diligence assessment of our key potentially high risk service provider in early 2025. The self assessment questionnaire covered three areas:

1. operations, workforce and remedy;
2. governance and due diligence; and
3. risk management.

The supplier was required to provide evidence to support their responses and upload policies and procedures, meeting minutes, training course outlines and other relevant information.

Led by SD Strategies, we reviewed the responses and supporting information provided and developed a list of key gaps and opportunities, which formed the basis of the corrective action plan issued to the supplier. While the supplier was deemed to be substantially effective across the first two categories, several gaps were identified in their approach to modern slavery risk management, particularly as it related to its Australian operations and goods sourced in China. We will continue to work closely with this supplier to ensure the risks of Uyghur forced labour are understood and mitigated throughout our shared supply chains.

While several improvement opportunities were identified, the service provider was deemed to present a medium to low risk for modern slavery (recategorised from potentially high risk in FY24).



Collgar's work in defining and making public commitments to social issues, including our work in developing our Modern Slavery Action Plan, has contributed to Collgar being recognised as Sector Leader in the annual GRESB Infrastructure Asset Assessment.



Let's keep talking



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