

16 October 2025

CLARKE ENERGY (AUSTRALIA) PTY LTD MODERN SLAVERY STATEMENT- 2024

Clarke Energy (Australia) Pty Ltd ABN 20 086 492 935 of registered office 40-46 West Thebarton Road, Thebarton 5031 South Australia (**Clarke Energy Australia**) is the reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)* (the **Act**).

The **attached Slavery and Human Trafficking Statement 2025** (the **UK Statement**) is prepared by Clarke Energy Limited (UK Company number 01341453) (**Clarke Energy**), being the sole shareholder of Clarke Energy Australia.

The UK Statement is to be read together with this covering statement, as the modern slavery statement submitted by Clarke Energy Australia.

Clarke Energy Australia is the Australian subsidiary of a global business specialising in the engineering, installation and long-term maintenance of distributed energy solutions.

Clarke Energy Australia employs approximately 135 employees, with fluctuations depending on the life-cycle of major projects. It operates under 5 primary divisions, including Commercial, Construction, Engineering, Finance and Sales.

Revenue in 2024 was comprised from construction activities (including full engineering, procurement and construction (EPC)), maintenance and service activities, and sale of goods.

Clarke Energy Australia's supply chain is primarily located in Australia, Austria, France and the United States. Its supply chains include suppliers of gas and diesel engines; mechanical and electrical componentry (including switchboards) and technical services; construction and building supplies and services; maritime, ground and air freight services; and related ancillary goods and services.

Clarke Energy's operations are primarily located in Australia. Clarke Energy Australia also operates in New Zealand. Each of Australia and New Zealand are identified by the Walk Free Global Slavery Index as being low risk.

Clarke Energy Australia also acknowledges that it may have modern slavery risks where its suppliers, or its supply chain acquires, goods and/or services from countries which are categorised by the Walk Free Global Slavery Index as being 'high-risk' countries.

Where Clarke Energy Australia's supply chain extends to such high-risk countries, Clarke Energy Australia has identified the need to ensure that it understands the origins of such supply, including to take appropriate measures to reduce such exposure.

Clarke Energy Australia's approach to modern slavery reflects the position adopted by Clarke Energy, and is a group-wide approach. Clarke Energy and Clarke Energy Australia have a number of policies and procedures which aim to identify, refrain from, manage and/or report modern slavery practices. These policies and procedures are reviewed regularly at a global and local level to ensure they remain relevant and effective.

Clarke Energy Australia has an established on -boarding procedure for its suppliers, which is supported by its *Contractor-Supplier Management procedure*.

This procedure includes acknowledgement by any potential supplier to comply with the UK Statement (which extends to our company policies relating to ethical procurement and anti-slavery and human trafficking), where the supplier does not have a suitable policy or statement of its own.

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On-going requirements to comply with the requirements of the Act (and reporting of offences under the Act) are incorporated into supplier terms and conditions, including Clarke Energy Australia's standard purchase order terms and conditions. Supplier performance is reviewed on a periodic basis.

Finally, employees of Clarke Energy Australia are encouraged to report suspected or actual occurrence of illegal, unethical events or inappropriate practices, without incurring retribution, in accordance with the Clarke Energy *Whistle-Blower Policy*.

Clarke Energy Australia and Clarke Energy have incorporated a variety of measures to assess the effectiveness of our procedures with the primary aim of reducing its exposure to modern slavery risks.

Notwithstanding these measures, it is acknowledged and understood that modern slavery risks may still occur. Accordingly, Clarke Energy Australia is committed to on-going review of these measures and its supply chain. To this end, Clarke Energy Australia has established a number of goals to enhance its approach to managing modern slavery risks.

This statement was approved by the Board of Clarke Energy (Australia) Pty Ltd in their capacity as principal governing body on 15 October 2025.

This statement is signed by Leanne McClurg in her role as Commercial Director of Clarke Energy (Australia) Pty Ltd on 16 October 2025.


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Leanne McClurg
Commercial Director
Clarke Energy (Australia) Pty Ltd



Engineer - Install - Maintain

Slavery and Human Trafficking Statement 2025

1. Modern Slavery

Modern Slavery is an umbrella term that encompasses slavery, forced labour, servitude and human trafficking. It is a crime and a violation of fundamental human rights. Under the UK Modern Slavery Act 2015, businesses are required to report on what actions they have taken to ensure there is no modern slavery within their supply chains and business operations.

Clarke Energy has a zero-tolerance approach to slavery and human trafficking and opposes all forms of human rights abuse. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain.

2. Our Business

Clarke Energy is a multinational specialist in distributed power generation solutions. Our international headquarters are located in Knowsley, near Liverpool in the United Kingdom. Our capabilities range from the supply of a gas fuelled power generation engine, through to the turnkey installation of a multi-technology power plant (including renewables). Clarke Energy is an authorised distributor and service provider for INNIO Jenbacher reciprocating gas engines with a strong focus on aftersales support. Clarke Energy's relationship with Jenbacher and in-country resources gives us an ability to provide unparalleled service and maintenance, along with local supply of original equipment manufacturer approved spare parts.

As of 1 May 2024, Clarke Energy is part of Rehlko, a global energy resilience business which is majority owned and controlled by Platinum Equity.

3. Due Diligence

We consider comprehensive and robust internal and external due diligence a key part of our modern slavery risk assessment framework in helping us to understand, identify and manage potential modern slavery risks for our business. To that end, we only work with suppliers who have completed our rigorous on-boarding process and have provided information in relation to their own position on slavery and human trafficking where applicable.

3.1. Labour Force

Clarke Energy employs circa 450 people in the UK and Ireland and circa 1400 people globally. We understand that the risk of modern slavery in labour forces is high. Our human resources team ensure that all our employees are subject to various and stringent human resources processes to ensure a right to work. We treat all our employees with equality and respect and ensure, among other things that: (i) working hours comply with relevant national laws; (ii) our employees are remunerated with wages and benefits set at or above local minimum wage requirements; and (iii) our working conditions meet the standards of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR). We therefore expect and require our suppliers to demonstrate the same level of commitment with the existence of processes and procedures to ensure our high standards are met.

3.2. Our Business Operations & Supply Chains

We operate in c. 28 countries around the world. We conduct a risk assessment of every country we operate in or source our goods from. We found that whilst we operate in countries which are deemed to be high risk countries of modern slavery we do not manufacture or distribute goods which, according to the Global Slavery Index, are at heightened risk of modern slavery. We do however source high risk goods from indirect suppliers such as laptops, computers and mobile phones, along with garments in the form of workwear for our employee and business needs.

We have therefore conducted audits and assessed our suppliers to satisfy ourselves that they meet our strict criteria and that they are taking a proactive approach to ensure there is no modern slavery occurring in any part of their supply chain.

4. Our Policies

All of our employees, suppliers, contractors and sub-contractors must adhere to all of our policies relevant to modern slavery, including our Ethical Procurement Policy and our Anti-Slavery and Human Trafficking Policy. All of our company policies are reviewed annually or when there are changes in legislation, regulations or best practice guidelines, to ensure they are effective.

5. Training

All new employees are trained with respect to modern slavery on induction to the company, and all UK based employees are provided with modern slavery training on a recurring basis. Further to our commitments in previous reports, we strengthened our employee training by offering more in-depth training to relevant employees who will continue to receive this training annually. As part of Rehlko., all of our employees are also required to complete ethics training periodically.

We actively encourage our employees, in line with our whistleblowing policy and the Rehlko Ethics Helpline, that should they have any genuine concerns of modern slavery or human rights abuses within our supply chain or our labour force, they should report their suspicions immediately for further investigation. Even if an employee is mistaken with their suspicions, we are fully committed to supporting our employees and ensuring they are treated fairly with no repercussions.

6. Supplier Audits

Modern slavery questions are included within our supplier audits which involve going onsite to meet and assess certain suppliers, focusing on their processes and procedures on modern slavery. Whilst our smaller suppliers are exempt from the

reporting requirements of modern slavery, we hope that by bringing an awareness to this issue and the many forms which modern slavery encompasses, we can assist in ensuring that any potential risk of modern slavery will be reduced.

7. Reports of Modern Slavery

We have not received any complaints or reports in relation to modern slavery within our business operations or throughout our supply chain.

This statement has been approved by the board of directors of Clarke Energy Limited as the parent company of the Clarke Energy group of companies. This statement is made in respect of Clarke Energy Limited together with all of its subsidiary undertakings from time to time and is made pursuant to section 54(1) of the Modern Slavery Act 2015, section 16(1) of the Australian Modern Slavery Act 2018 and constitutes the Clarke Energy Group's Slavery and Human Trafficking Statement for the financial year ended 31st December 2024.



Jamie Clarke | **Chief Executive Officer**
Clarke Energy

Date: 23 January 2025