



group
elecnor

**Modern Slavery
Statement**

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1. Introduction



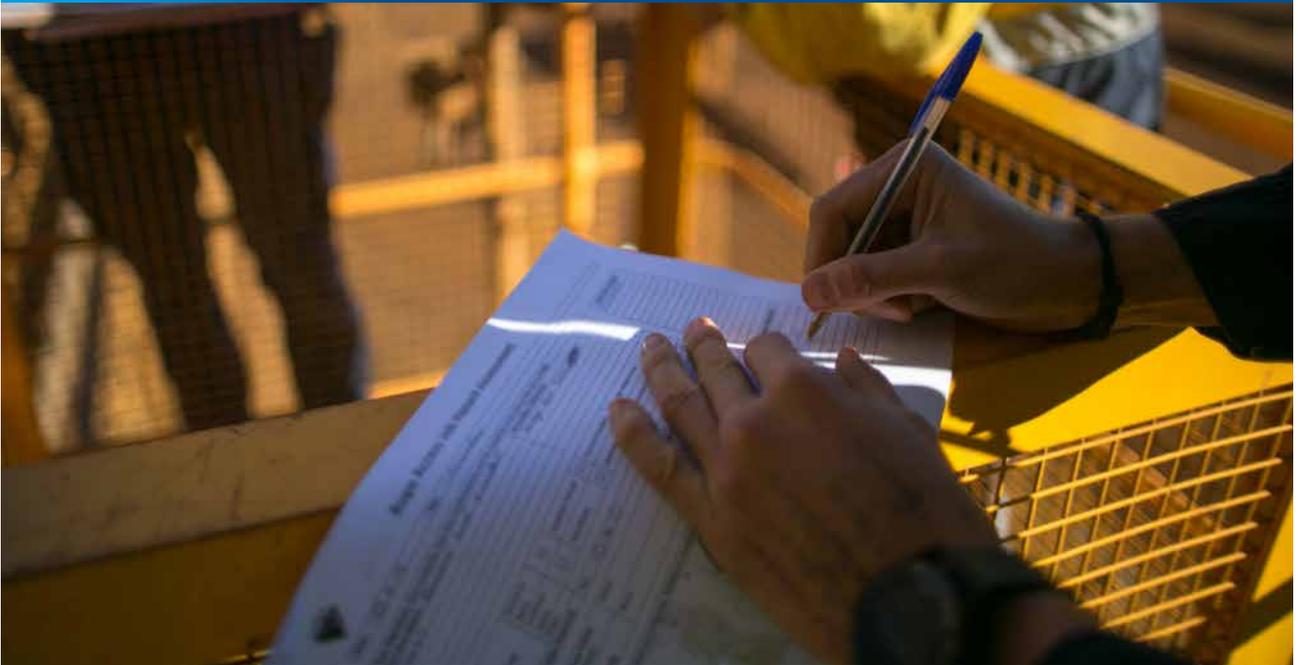
This is a modern slavery statement for a single reporting entity, made by Green Light Contractors PTY LTD (ABN 83 168 435 658).

This statement is published as part of Green Light Contractors' obligations under the Modern Slavery Act (Cth) 2018. For the reporting period 1 January 2021 to 31 December 2021 (2021 Calendar Year). This is the first Modern Slavery Statement published by Green Light Contractors, the company having a consolidated revenue of at least \$100million for the first time in the reporting period.

This statement describes activities initiated through the reporting period to strengthen Green Light Contractors' processes and identify risks of modern slavery in Green Light Contractors' operations and supply chains.

Our company values at Green Light Contractors outlines our commitment to focusing on providing a safe environment for all. We are focused on people and their safety. We are committed to creating trust with our suppliers and customers. We are a responsible organisation that prides ourselves on our respect, integrity, and ethics. We aim to be a people centric business generating shared value and sustainability.

2. Reporting Entities structure, Operations and Supply chains



Entity structure

Green Light Contractors is a wholly owned and controlled subsidiary of Elecnor Australia PTY LTD (90 164 831 930).

What we do

Green Light Contractors is primarily involved in the renewable energy industry and the projects that we undertake mainly comprise of electricity & electricity generation.

Operations locations

Green Light Contractors has projects broadly spread across Australia. Our principal office locations and projects are set out below. Green Light Contractors has 160 employees.

Registered office location – Melbourne

Offices in Sydney & Brisbane

Project sites – Port Augusta, Goyder, Queanbeyan, Flyers Creek, Uralla

In Australia our four main operating departments are Transmission Lines, Solar, Wind and Energy.

For the reporting period, Green Light Contractors employed approximately 160 people across its operations in Australia.

Supply chains

Green Light Contractors’ supply chain is spread across the globe. Our network of suppliers provides us with services and goods for our specialised projects across Australia.

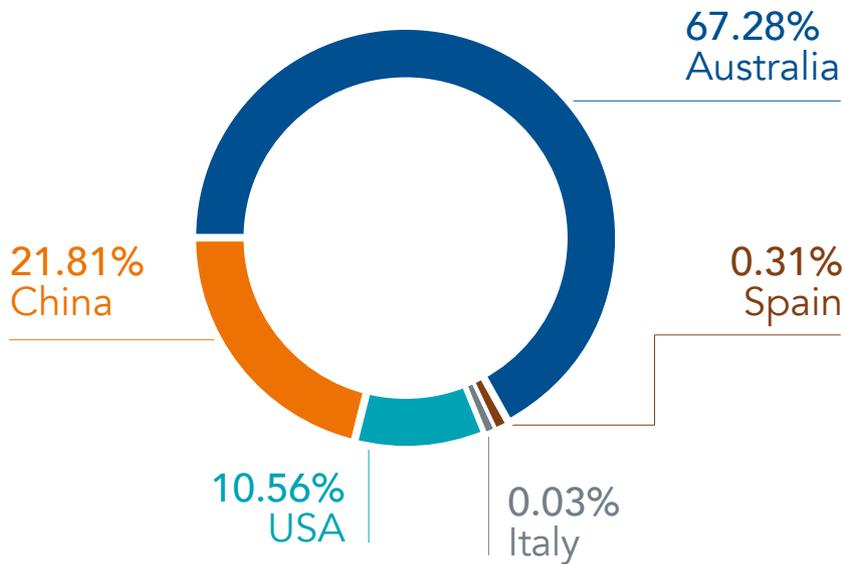
For the reporting period, the top 5 countries from which Green Light Contractors procured materials and equipment were as follows:

100.00%	Total
21.81%	China
10.56%	USA
0.03%	Italy
0.31%	Spain
67.28%	Australia

Our top spend categories for goods and materials are:

- Photovoltaic Modules
- PV Inverter Stations
- PV Tracker System
- 33 kV Cable and Bare Earth
- Power Transformers

Top 5 spend locations



3. Risks of modern slavery



In the reporting period there were no incidents of actual or potential modern slavery identified in Green Light Contractors' operations or supply chain.

Green Light Contractors acknowledges that each country in which it operates and from which it obtains materials and equipment carries with it the potential risk of situation of exploitation falling within the above definition of modern slavery. The number of people recorded to be living in modern slavery per a global survey consists of:

China - Estimated 2.77 people living in modern slavery per 1000 - High Risk

Italy - Estimated 2.43 people living in modern slavery per 1000 - High Risk

Spain - Estimated 2.27 people living in modern slavery per 1000 - High Risk

USA - Estimated 1.26 people living in modern slavery per 1000 - Medium Risk

Australia - Estimated 0.65 people living in modern slavery per 1000 - Low Risk

<https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

In our operations

Green Light Contractors has assessed the risk of modern slavery in its direct operations as low, by virtue of its operations occurring solely in Australia, a country with a high standard and public expectation of corporate governance. Green Light Contractors recognises however that incidences of modern slavery can and do still occur in Australia.

Green Light Contractors has strict employment processes in place to ensure the eradication of modern slavery in its workforce. Green Light Contractors ensures that all employees meet the National Employment Standards under Australian Law, additionally we review employee remuneration annually to ensure compliance with all applicable legislation.



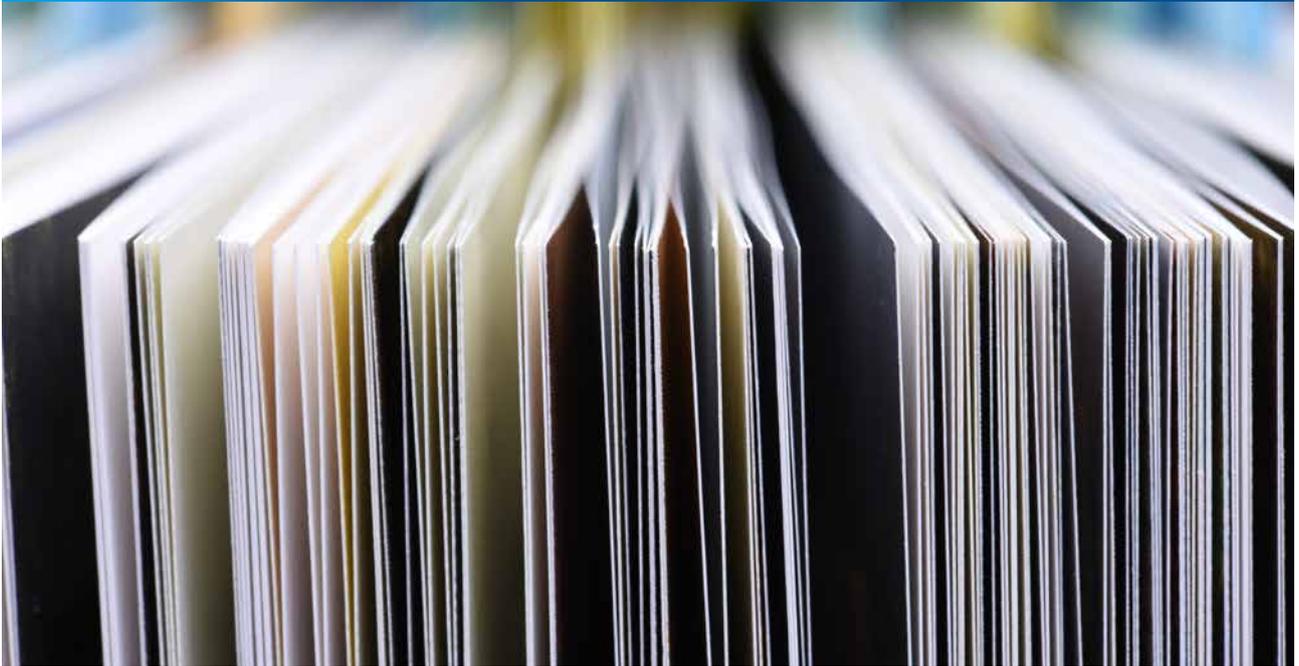
The Green Light Contractors Human Resources Department regularly reviews the operational procedures and working conditions to ensure adherence to applicable standards and laws.

Green Light Contractors will from time to time engage with labour hire agencies in the Australian market. These agencies are required to operate in compliance with all relevant legislation and laws. This is enforced through Green Light Contractors agreements with recruitment and labour hire agencies.

In supply chains

Green Light Contractors operates in the energy sector. Due to the complex nature of the energy supply chain there may be risks that Green Light Contractors is linked to exploitative worker relationships indirectly via its supply chain.

4. Actions to assess and address the risks



Green Light Contractors has a framework in place to mitigate the risk of Modern Slavery in its operations and supply chain.

Green Light Contractors Polices and Standards

Green Light Contractors has policies and standards in place that require the workforce, sub-contractors and suppliers to act ethically at all times. Special mention is made of its *Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators*, that constitutes an essential tool to encourage its suppliers, subcontractors and collaborators to conduct their professional pursuits in accordance with only the best business practices and the highest ethical standards, particularly in the fields of ethics and integrity, respect for human, social and labour rights, health and safety, environment protection and quality.

Apart from this code, these polices and standards include:

- Code of Conduct and Ethics
- Diversity and Equal Opportunity Policy
- Human Rights Policy
- Modern Slavery Policy

We require all subcontractors and suppliers to comply with the Green Light Contractors' policies in our subcontractor and supplier agreements.

Green Light Contractors encourages disclosures of any potential or suspected unethical, illegal, or unsatisfactory conduct that involves any of the business activities including human rights violations. We encourage disclosures of misconduct through our whistle blower policy.

Green Light Contractors has in place a Whistleblower Policy to ensure concerns can be raised anonymously.

Green Light Contractors is committed to engaging in continuous improvement and awareness around Modern Slavery Practices.

5. Assessing the effectiveness of actions

As part of this reporting period, Green Light Contractors concentrated on the risks of modern slavery within its supply chain and improved its understanding of them.

To reduce slavery risks in its operations and supply chain, Green Light Contractors analysed risks and used its processes. By using these measures, Green Light Contractors can identify suppliers and subcontractors who may be subject to modern slavery and advise prior to engaging with suppliers that modern slavery is unacceptable.

Additionally, Green Light Contractors are building more effective tools to measure the effectiveness of the mitigation measures used, in addition to continuing to improve detection, escalation, and other mitigation capabilities.

6. Process of consultation

This Statement was prepared in consultation with Green Light Contractors Human Resources, Finance and Quality / Environment teams.

7. Approval

In accordance with section 13 of the Modern Slavery Act, this statement was approved by the Board of Green Light Contractors Pty Ltd on 29 June 2022.



Samuel Basanta Lopez - Operations Director