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Modern Slavery Joint Statement

A joint statement for ACCIONA Energy Australia Global Pty Ltd
and ACCIONA Energy Oceania Construction Pty Ltd

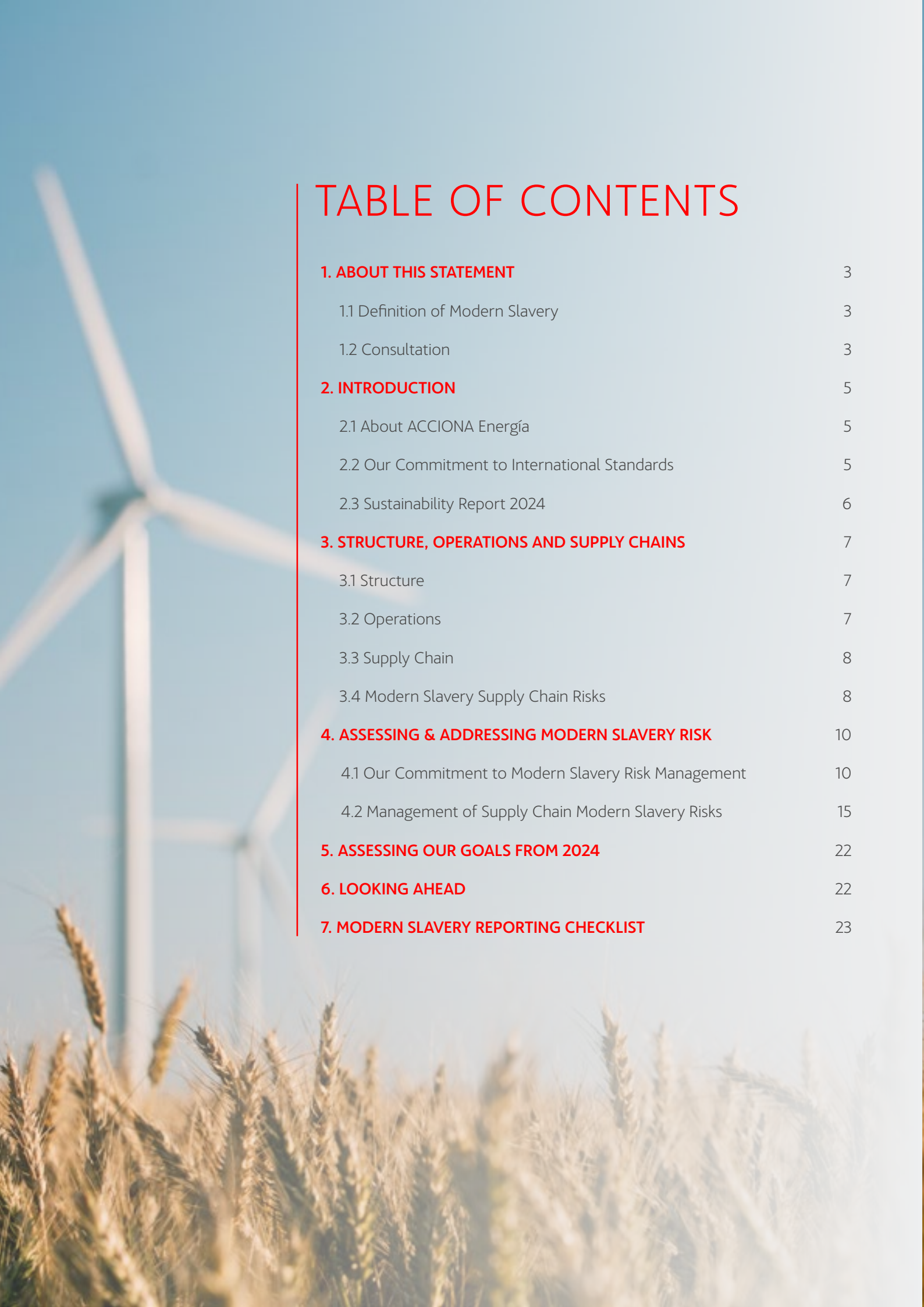


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1. About this statement

This Joint Modern Slavery Statement (**Statement**) is prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (**Act**) for the period 1 January 2024 to 31 December 2024 (**Reporting Period**). The statement addresses how we identify, assess and address modern slavery risks within our operations and supply chains. The statement forms part of our ongoing reporting obligations to be read alongside the ACCIONA Energía annual Sustainability Report 2024 (**Sustainability Report**). In particular, this statement addresses:

- our commitment to supply chain transparency;
- the steps we have taken to identify, assess and address risks of modern slavery; and
- the effectiveness of our modern slavery policies.

This joint Modern Slavery Statement is prepared by ACCIONA Energy Australia Global Pty Ltd (ACN 600 910 647) (**AEAG**) and ACCIONA Energy Oceania Construction Pty Ltd (ACN 164 011 723) (**AEOC**) (collectively referred to as the **Reporting Entities**). AEOC is a wholly owned subsidiary of AEAG and AEAG is a wholly owned subsidiary of ACCIONA Energía Global S.L (**ACCIONA Energía Global**). ACCIONA Energía Global is a subsidiary of Corporación ACCIONA Energías Renovables, S.A. (**ACCIONA Energía**) which is majority owned by ACCIONA S.A (**ACCIONA SA**).

This statement uses the term **ACCIONA Group** to refer to all the ACCIONA entities that are owned by ACCIONA SA, inclusive of ACCIONA Energía and the Reporting Entities.

All references to our, we, us and **ACCIONA Energía** refer to ACCIONA Energía and its subsidiaries, including the Reporting Entities.

All references to a year refer to the period 1 January 2024 to 31 December 2024 unless otherwise stated. All monetary values refer to Australian dollars (AUD\$) unless otherwise stated. All monetary values are based on the assumed exchange rate as of 5 May 2025: AUD\$1: EURO€ 0.5962.

1.1 Definition of Modern Slavery

The definition of modern slavery in the Act is adopted in this Statement. According to the Act, modern slavery generally includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking of persons, deceptive recruitment practices for labour/services and the worst forms of child labour.¹

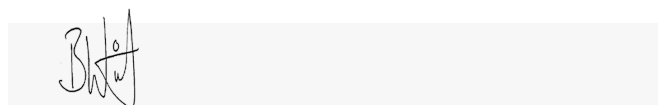
1.2 Consultation

AEAG owns 100% of the issued share capital in ACCIONA Energy Oceania Financial Services Pty Ltd ACN 155 674 347 (**AEOFS**). AEAG consulted with AEOFS in the development of this statement and provided its Board with a copy of this statement. Otherwise, the reporting entities do not own or control any other companies or corporate entities.

This Joint Statement has been approved by the Board of Directors of the Reporting Entities. Brett Wickham, as a Director of each Reporting Entity, was authorised to sign this Statement on behalf of AEAG and AEOC.

Feedback

If you have any feedback or requests for further information, please contact energy.compliance.au@acciona.com



Brett Wickham

Managing Director at ACCIONA Energía Australia
Director, ACCIONA Energy Australia Global Pty Ltd
Director, ACCIONA Energy Oceania Construction Pty Ltd

¹ Modern Slavery Act 2018 (Cth), section 4.



"ACCIONA Energía supports, respects and contributes to the protection of internationally recognised fundamental human rights, making sure not to be complicit in any form of abuse or violation of those rights with regard to workers, suppliers, contractors, partners, competitors, customers, local communities and society in general"



2. Introduction

2.1 About ACCIONA ENERGÍA

ACCIONA Energía is a global group of companies that develop and manage sustainable infrastructure solutions, especially in renewable energy. With commercial operations in 24 countries, a diverse workforce of over 3200 employees from 51 nationalities and sales of \$5.11 billion in 2024, we are committed to contributing to a low carbon future while providing economic and social benefit to the communities in which we operate. We are recognised as one of the best companies to work for in Spain, the United States, Brazil, Mexico, Australia, South Africa, Chile and Peru. This is evidenced by our Top Employer certification, newly certified in Peru and renewed in all other countries listed.

We design, construct and supply a range of clean energy technologies and solutions. These include wind, photovoltaic solar and battery storage. We are highly integrated in other aspects of the renewable value chain, such as finance, maintenance, and marketing.

Given the all-pervading nature of our supply chains, we are acutely aware of the prospect that modern slavery may be present in our supply chains through our suppliers, contractors and collaborators. We believe that all companies, especially those that operate globally, must act in order to minimise the risk of modern slavery in their supply chains.

As such, we reaffirm our continuing commitment to defending human rights as a guiding principle in our business activity.

2.2 Our Commitment to International Standards

ACCIONA Energía respects and adopts the values included in the main international standards for the protection of Human Rights:

- the United Nations Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the Declaration on Fundamental Principles and Rights at Work from the International Labour Organisation (ILO) and its fundamental conventions;

- the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- the Guidelines for Multinational Enterprises from the Organization for Economic Co-operation and Development (OECD);
- the United Nations Convention on the Rights of the Child;
- the United Nations Global Compact;
- the Seoul Declaration on Safety and Health at Work;
- the United Nations Declaration on the Rights of Indigenous Peoples; and
- the ILO's Indigenous and Tribal Peoples Convention.

Further, ACCIONA Energía contributes to the achievement of the United Nations' Sustainable Development Goals (SDG) and is aligned with the United Nations Guiding Principles on Business and Human Rights, as well as the Voluntary Principles on Security and Human Rights. The regulatory frameworks are fundamental for managing Human Rights due diligence and reflect a responsibility and respect-based approach that ACCIONA Energía promotes throughout its value chain.





2.3 Sustainability Report 2023

In April 2021, ACCIONA Energía launched its third five-year Sustainability Master Plan 2025 (SMP2025). The SMP2025 is designed to position ACCIONA Energía as a globally recognised leader in developing and operating renewable energy assets with an additional value of thinking of people and the planet.

The SMP2025 has four overarching pillars:

1. People at the Centre;
2. Planet Positive;
3. Integrate to Transform; and
4. Exponential Leadership.

Each pillar has a number of levers to achieve the overall objectives. The Sustainability Report 2024 (**Sustainability Report**) sets out the progress made in 2024 across each lever. Importantly, we have increased the number of ESG audits of Tier 1 and Tier 2 suppliers and our Social Safeguards Internal Control System has been enriched by independent third-party audits of projects in accordance with ILO Conventions and other international reference standards. A diverse global team is currently developing the next Sustainability Master Plan covering 2026-2030, to be approved and launched later in 2025.

The Sustainability Report was published in April 2025 and covers the 2024 calendar year. The Sustainability Report sets out how ACCIONA Energía is contributing to sustainable outcomes and positive impacts for our people and the communities within which we operate. The Sustainability Report is compliant with the Corporate Sustainability Reporting Directive, and the outcomes presented are independently verified by KPMG.

ACCIONA Energía has been assessed by various ESG analysts. As of year-end 2024, the current ratings are as follows:

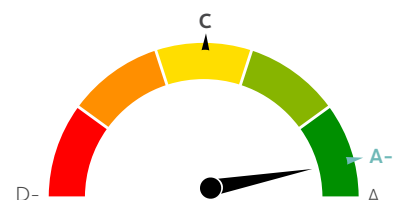
▲ Industry Average

▲ ACCIONA Energía 2024 Score

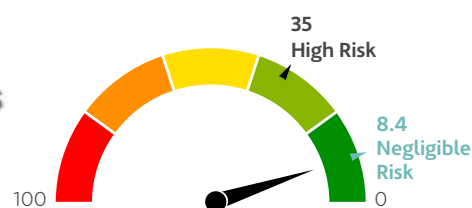
S&P Global
Industry: Elec Utilities



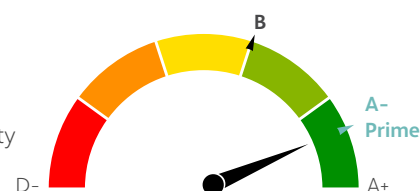
CDP
Industry: Utilities



SUSTAINALYTICS
Industry: Utilities



ISS ESG
Industry: Renewable Electricity



ecovadis
Industry: Electricity, gas, steam and air-conditioning supply



3. Structure, Operations and Supply Chains

3.1 Structure

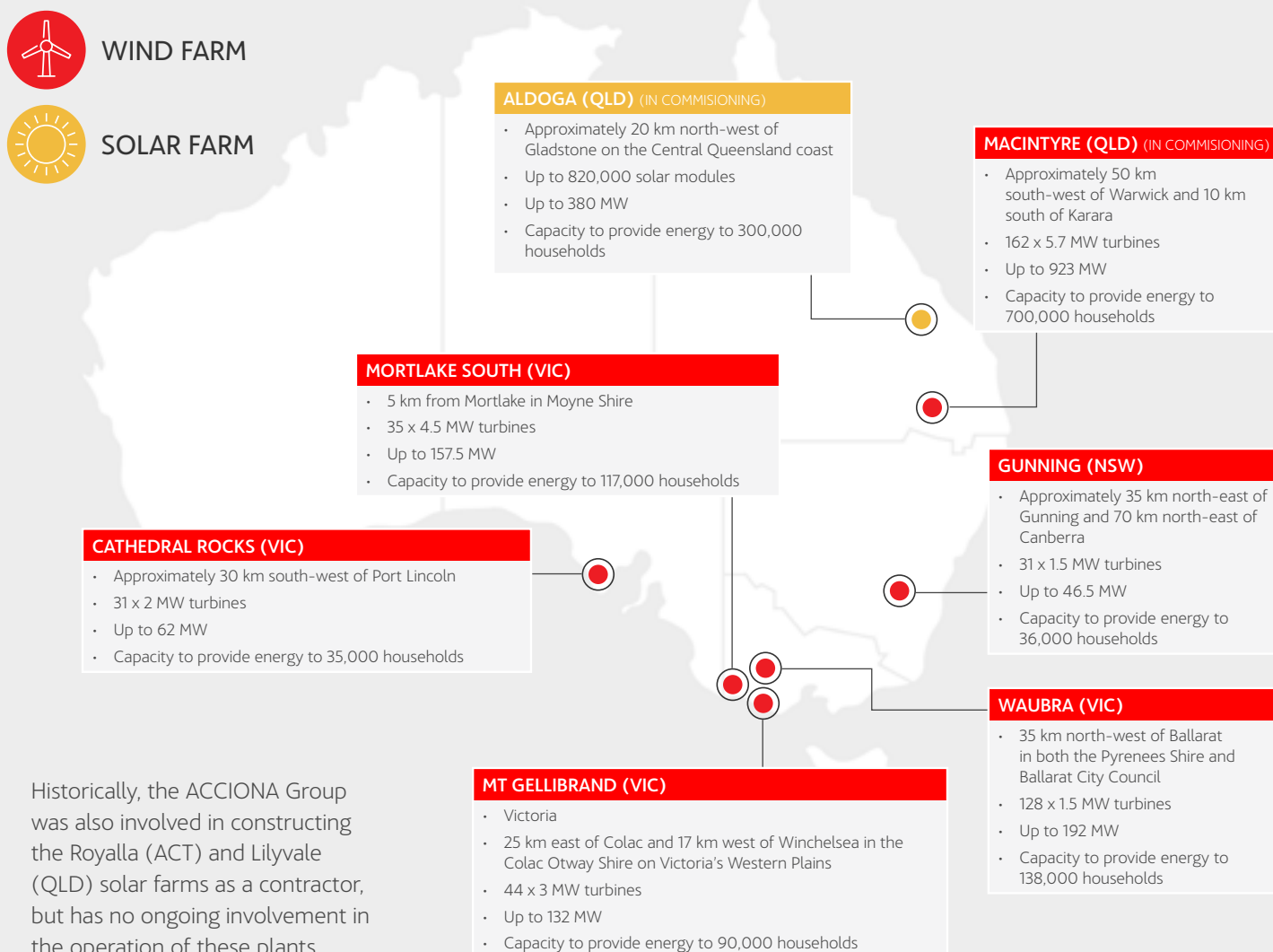
ACCIONA Energía has been operational in Australia for over twenty years. We have offices in Victoria, Queensland, New South Wales, and Western Australia.

The Reporting Entities (both of which are Australian incorporated companies) form part of ACCIONA Energía. ACCIONA Energía is majority owned by ACCIONA SA. The Reporting Entities adopt the policies and standards of ACCIONA Energía, and global guidelines inform local procedures.

3.2 Operations

Our operations in Australia focus largely on wind and photovoltaic (PV) solar renewable energy projects. Through our operations we have generated \$109 million in sales in 2024. As at the end of the reporting period, we directly employed 293 people in Australia, with 91 of those recruited in 2024. If we include indirect employment through contractors on our construction projects, this figure is over 2000 people.

As of the date of this Statement, ACCIONA Energía is operating 5 wind farms in Australia with a total installed capacity of 600MW. Two projects are in the commissioning phase in Queensland, one wind farm and one PV solar farm.



3.3 Supply chain

In 2024, AEAG engaged with 334 tier 1 suppliers, with purchases totalling \$350 million. We are integrated in the entire value chain for renewable energy projects. Our supply chain is necessarily diverse, extensive, and complex.

ACCIONA Energía’s suppliers are classed as tier 1 suppliers when they directly supply ACCIONA Energía. Suppliers that supply our tier 1 suppliers are classed as tier 2 suppliers. The tiering system continues down the supply chain.

In some circumstances, our tier 1 suppliers are related entities within the ACCIONA Group. In such instances, our tier 2 supplier would be the supplier of our related entity.

ACCIONA Energía defines a strategic supplier as a supplier whose annual commercial relationship is worth more than \$670,880. Globally, 10% of ACCIONA Energía’s supply chain meets the definition of strategic supplier and accounted for 91% of purchases in 2024.

Nineteen of our tier 1 suppliers in 2024 have overseas headquarters, including suppliers of main components such as wind turbines, photovoltaic panels, and cables. The majority of these suppliers are located in Spain, with others located in Argentina, China, Germany, Great Britain and the United States.



3.4 Modern Slavery Supply Chain Risks

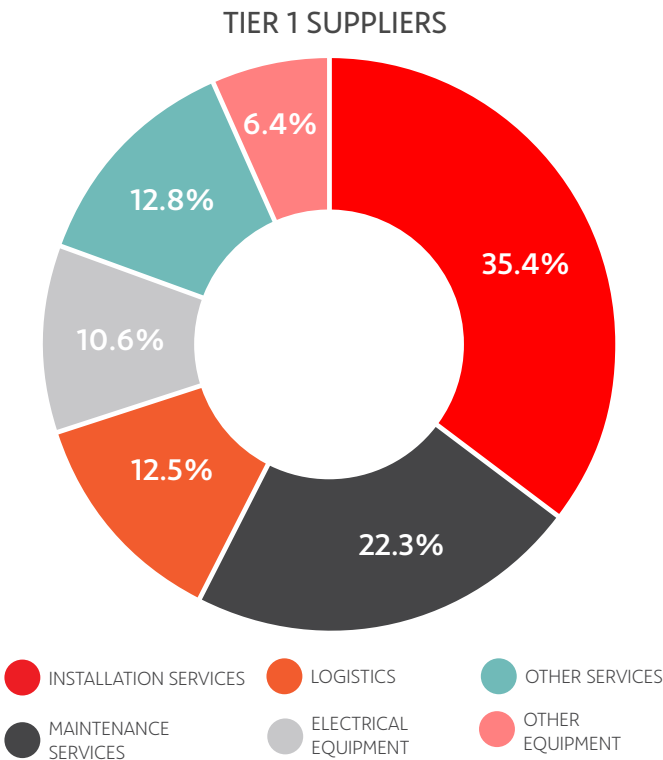
The risks of modern slavery in the renewable energy industry are well documented. The resources necessary for many renewable energy products are often sourced from parts of the world that are impacted by conflict, weak governance, low incentive for worker protection and/or state-imposed forced labour.²

Our Commitment to Continuous Improvement

ACCIONA Energía is committed to continuously analysing its impact on communities around the world. In 2024, ACCIONA Energía completed its third Dual Materiality Analysis (DMA) which, among other things, assesses the company’s significant effects on the workers in its supply chain. The results of the DMA were used to identify material risks in our supply chain and inform any changes that need to be made.

Using a series of metrics covering over 300 sites around the world, ACCIONA Energía identified that the primary modern slavery risks in its supply chain relate to:

1. forced labour in China; and
2. child labour in the extraction of minerals necessary for renewable energy.



² Source: Beyond Compliance in the Renewable Energy Sector | Walk Free WalkFree, 2023.

Further, ACCIONA Energía recognises three main types of risk associated with supply chain processes:

1. non-compliance by suppliers with ACCIONA Energía's standard conditions;
2. contracting of suppliers that present financial or ESG risks in any of their areas; and
3. contracting of suppliers not technically valid for the provision of the service or supply of the product.

See below and section 4 of this Statement for how we have adopted and continue to improve our mitigation strategies for these risks.

Workers in the renewable energy industry supply chain are particularly vulnerable to:

- forced labour;
- wage theft;
- illegal overtime; and
- hazardous conditions.³

Migrant Workers

Modern slavery risks are exacerbated by the high number of vulnerable migrant workers utilised in mineral extraction for renewable technologies.⁴ Migrant workers are more likely to have insufficient information about their legal rights and the terms of their employment, which make them prone to exploitation.

High Risk Countries

Circumstances of modern slavery in resource extraction is more likely to occur in jurisdictions where there is little or no protection of workers' rights.

Geopolitical risk scores are based on various indices extracted from Maplecroft, an ESG risk data provider, and GoSupply, our supplier management platform. This allows us to analyse the risk of worker exploitation in each country in terms of human rights and labour conditions. Other issues considered under geopolitical risk include conflicts, tax havens and socio-economic conditions.

Solar Project Risks

As previously stated, one of Acciona Energía's key renewable energy technologies is PV solar. The primary modern slavery concern in our solar renewable energy projects is the possible use of forced labour in the production of polysilicon in China.

Polysilicon is an important material that needs to be sourced for solar renewable technologies.

Approximately 95% of global solar panels use polysilicon sourced from China. Additionally, 40-50% of global supply is sourced from the Xinjiang Uyghur Autonomous Region of China (**Xinjiang**).⁵ There is strong concern from the international community that forced labour may be used in Xinjiang when extracting and processing polysilicon.

Windfarm Project Risks

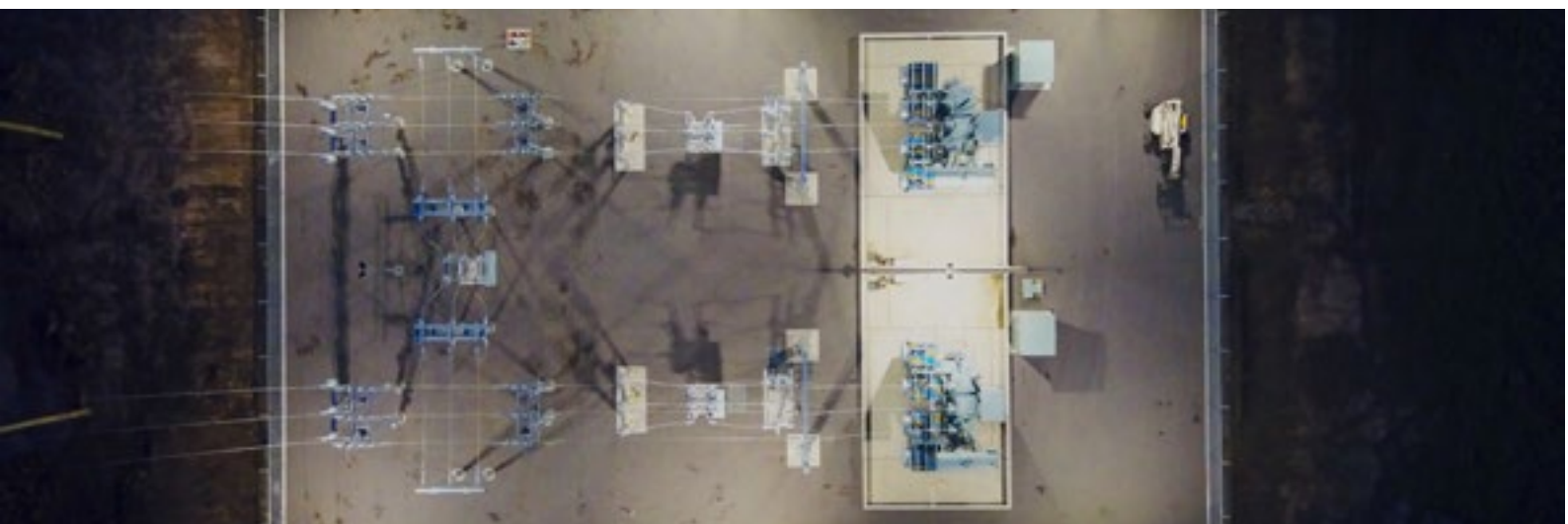
There are similar modern slavery risks with respect to the supply of materials for wind farm projects. These risks apply to the windfarm industry as a whole so are therefore not specific to Acciona Energía. Nonetheless, Acciona Energía is aware of, and is vigilant with respect to these risks.

The future of our clean energy transition is at risk if it is built on the exploitation of communities and people. Ignoring modern slavery in these supply chains will erode the benefits of the transition to renewable energy.

³ Source: WalkFree Beyond Compliance in the Renewable Energy Sector: Assessing UK and Australian Modern Slavery Statements

⁴ Source: Walkfree Ipek Gencu, Nathaniel Mason, ODI Migration for climate action: how labour mobility can help the green transition

⁵ Source: James Cockayne, Edgar Rodriguez Huerta and Oana Burcu The Energy of Freedom? Solar energy, modern slavery and the Just Transition





4. Assessing & Addressing Modern Slavery Risk

ACCIONA Energía sets high standards both internally and for those companies with which we do business, identifying and addressing risks related to modern slavery under a Plan – Do – Check – Act approach.

4.1 Our Commitment to Modern Slavery Risk Management

ACCIONA Energía has standards and policies in place that outline our approach to identifying and mitigating modern slavery risk, primarily the Code of Conduct, Human Rights Policy, and Migrant Workers Standard. Our Social Safeguards System ensures that these requirements are being met, and our Ethical Channel provides an avenue for reporting potential breaches of our standards and policies.

ACCIONA Energía Code of Conduct

The ACCIONA Energía Code of Conduct (**Code of Conduct**) establishes the values that govern the behaviour of all ACCIONA Energía people and the behaviour of third parties with whom we interact.

The Code of Conduct sets out the standard of conduct that all members of the Group (including directors, managers, and employees) must exhibit at all times, including when dealing with suppliers and third parties. Employees must expressly accept the standards of conduct set out in the Code of Conduct. The standards of behaviour set out in the Code of Conduct are derived from our commitments to national and international standards. The global Compliance department is available to answer any queries that employees may have about interpreting the Code of Conduct.

The Code of Conduct reinforces our commitment to the principles that guide all individuals and companies associated with ACCIONA Energía. These principles include, among others, the respect for Human Rights, the promotion of fair and safe working conditions, the contribution to social development, and consideration of the interests of the local communities where ACCIONA Energía operates.

The Code of Conduct outlines the following baseline commitments:

- Ensuring that the Organisation's members have fair working conditions, work hours and wages;
- Outrightly rejecting child and forced labour wherever it operates; and
- Exclusively collaborating with third parties that respect Human Rights, refusing to cooperate with any entity that violates them.

We encourage other entities such as suppliers, contractors, collaborators, and other partners to accept and act in accordance with the principles set out in the Code of Conduct.

Human Rights Policy

ACCIONA Energía companies are also subject to ACCIONA's Human Rights Policy (**Human Rights Policy**), identical to the ACCIONA Group policy but specifically approved by our board of directors. The Human Rights Policy is implemented so that the ACCIONA Group aligns itself with the principles and objectives of the major international agreements and conventions on human rights, such as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the UN Global Compact (among others).

The Human Rights Policy applies to all ACCIONA Group companies in which the ACCIONA Group exercises control of management, regardless of geographic location. It applies to all directors, managers, and employees, regardless of their position. To the extent that the ACCIONA Group does not exercise control over the management of a company but has an equity stake, it will ensure that ACCIONA Group representatives promote the adoption of the Human Rights Policy.

ACCIONA Group promotes the adoption of the Human Rights Policy by its suppliers, contractors and collaborators.

Among the obligations contained in the Human Rights Policy is the 'prohibition of forced labour and modern slavery'. ACCIONA Group companies are prohibited from engaging forced labour, any form of modern slavery or trafficking in persons in accordance with the Forced Labour Convention and the Abolition of Forced Labor Convention. Furthermore, ACCIONA Group companies undertake not to employ children under the age of 18 and strictly prohibit the use of child labour in accordance with the Minimum Age Convention and the Worst Forms of Child Labor Convention.



ACCIONA Group prohibits any kind of work under threat and requires that workers do not pay undue fees or costs. Employment agencies must comply with these principles.

The Human Rights Policy is available to the public on our website: ACCIONA Energía – Human Rights Policy.

Migrant Workers Welfare Standard

ACCIONA Energía implements a Standard on Migrant Workers Welfare: Recruitment, Employment and Accommodation (**Migrant Workers Welfare Standard**). It sets out the procedures that must be followed to ensure that migrant workers are not exploited. ACCIONA Group companies and their suppliers, contractors and collaborators must follow the Migrant Workers Welfare Standard when dealing with migrant workers.

The Migrant Workers Welfare Standard aims to mitigate the unique risk of exploitation that the hiring of migrant workers poses. In order to mitigate against debt bondage risks, migrant workers are not permitted to enter forced savings programmes to pay off recruitment fees or placement fees.

Social Safeguards System

ACCIONA Energía has developed the Internal Control System for Social Safeguards (**ICSSS**) to mitigate ACCIONA Energía's negative impact on human rights. This system is based on internal control models developed by the Committee Sponsoring Organisations of the Treadway Commission (**COSO**). ICSSS integrates within ACCIONA Energía a culture of risk assessment and management of compliance with our international human rights regulations and principle commitments. The ICSSS aims to promote and consolidate a true culture of compliance with and respect for both existing legislation and international human rights standards.

ICSSS is designed to undertake two key objectives:

- 1. Identification and assessment of risks:** Identification and assessment of real or potential negative impacts on human rights; and
- 2. Prevention and mitigation of risks:** Prevention and mitigation of real or potential negative impacts on human rights.

Identification and assessment of risks

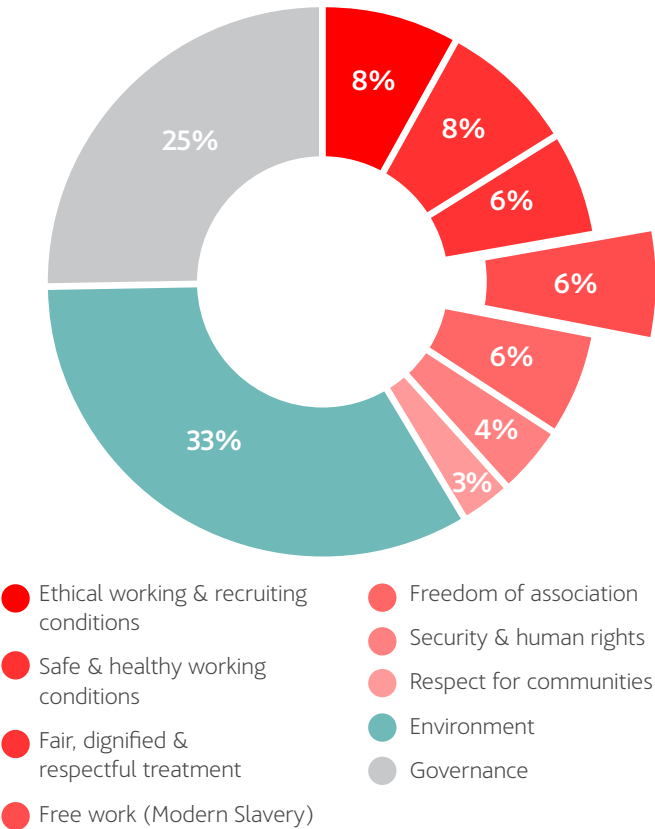
The ICSSS indicators include, among others, the following specific indicators relevant to modern slavery:

- child labour;
- forced labour;
- migrant workers; and
- human trafficking.

Each of ACCIONA Energía's 326 international facilities are assessed individually for real or potential negative impacts on human rights based on these indicators, as part of the annual non-financial risk analysis.

In 2024, ACCIONA Energía identified that modern slavery risks accounted for 6% of sustainability-related risks across the company. Other social indicators accounted for a further 36% of company sustainability risks.

REPRESENTATION OF INDICATORS AT RISK LEVEL



Prevention and mitigation of risks

As part of the ICSSS, 'control activities' are carried out on every identified risk of real or potential negative human rights impact to mitigate the relevant risk. There are 80 related control activities resulting from policies, standards, and procedures to defend the principles that define responsible business conduct.

The Sustainability Department updates the risks and controls annually, following the annual monitoring performed by the Internal Audit Department. Detection of real or potential negative impacts on human rights is carried out on a yearly basis under non-financial risk analysis.

The ICSSS is carried out by ACCIONA Energía's Audit and Sustainability Committee. The Audit and Sustainability Committee uses the ACCIONA-Risk Management System / MetricStream tool (**ACCIONA RMS**) to monitor risks and make recommendations and action plans to mitigate identified risks. Training is provided to both executive and non-executive directors who sit on the Audit and Sustainability Committee on an annual basis.

Furthermore, ACCIONA Energía employ third-party on-site audits of the company's activities to ensure the ICSSS is being implemented effectively and is achieving positive outcomes. These audits include interviews with staff. In 2024, audits confirmed that the system was properly implemented. Once external monitoring procedures have been completed, reports are prepared that reflect the results. If adverse situations have been detected, recommendations are made and specific action plans are designed to correct them.



Case Study – Human Rights Risk Assessment

In 2024 a comprehensive Human Rights Risk Assessment (HRRRA) was carried out by an independent third-party audit firm for the Aldoga Solar Farm in Queensland. This covered issues such as potential impacts to the community from strain on local infrastructure and services, treatment of workers working directly on the project and in the supply chain, and cultural heritage and socioeconomic impacts to First Nations peoples. No high risks were identified. The HHRA recognised the existing safeguards to address these potential risks and impacts, and recommended some additional mitigation measures that we are implementing. These include better communication of social actions to the community, increased awareness of grievance mechanisms amongst workers and finalising the First Nations Benefit Sharing Plan.

ACCIONA Energía Ethical Channel

ACCIONA Energía has an Ethical Channel, which is integral to our Internal Reporting System and available for any individual to report to the Ethical Channel Committee regarding any potential irregularities, breaches or misconduct related to ACCIONA Energía's activities. This includes any action that may constitute modern slavery, that may be considered contrary to the Group's current legal framework, their Code of Conduct, and/or ethical values.

In accordance with the provisions of the Ethical Channel Policy, communications can be made through the following means:

- through the Ethical Channel form available on the website and intranet: <http://canaletico.acciona.com/>;
- by postal mail;
- through voice messages;
- through face-to-face meetings;
- videoconferences; or
- telephone calls.

ACCIONA Energía informs employees and third parties with whom it engages about the existence and purpose of the Ethical Channel.

The management of the Ethical Channel is based on the following core principles:

- guarantee of confidentiality for all communications received;
- respect for the anonymity of individuals who do not wish to be identified;
- impartiality and objectivity in the evaluation of cases;
- respect for the rights of all parties involved in the handling of cases;
- absence of retaliation against informants who report in good faith;

The Ethical Channel is managed by the Ethical Channel Committee, a body whose functions include, among others:

- Facilitate a communication channel for all members in the Organisation, and for third parties too, not only to gather and provide information on the compliance with the Code of Conduct, but also to manage the complaints and queries received and thus facilitate the coordination of their resolution and follow-up.
- Manage the Ethical Channel based on the principles of guaranteed confidentiality, respect for the anonymity of persons who do not wish to identify themselves, no retaliation against whistleblowers who report in good faith, impartiality and objectivity, and respect for the rights of all parties involved in the inquiries.
 - Confidentiality: ensuring the confidentiality of the whistleblower's identity is a guiding principle in the management of the Ethical Channel. The persons entrusted and designated to receive and process complaints, as well as to implement the measures resulting from the processing of the complaints, have an obligation to keep the identity of the whistleblower and of the person affected by the complaint made strictly confidential.





- Anonymity: the Ethical Channel can be used for making anonymous complaints. Therefore, it is strictly prohibited to undertake or fail to undertake any actions with the aim of revealing the whistleblower's identity when he/she has opted to remain anonymous.
- Non-retaliation: whistleblowers who report wrongdoing in good faith may not be penalised or suffer any negative consequences or retaliation for lodging their complaints. This guarantee of non-retaliation extends to persons associated with the whistleblower, to natural persons assisting the whistleblower during the lodging and processing of the complaint, as well as to the legal representatives of the employees in the exercise of their duties of advising and supporting the whistleblower.
- Review all complaints received through the Ethical Channel and determine the methodology to be used in processing and investigating them.

Report regularly to the Board of Directors, through the Audit and Sustainability Committee, on any complaints reported and their resolution.

Although the online communication channel (web form) is common to the entire ACCIONA Group, the communications sent through it are automatically segmented, guaranteeing independent and confidential management by the Ethical Channel Committee in relation to communications concerning ACCIONA Energía.

The Audit and Sustainability Committee oversees the activities carried out by the Ethical Channel Committee, receiving information on the communications submitted.

The Ethical Channel Policy was updated in 2024 in order to simplify the wording of its content and clarify certain elements to facilitate its understanding. The main elements of this Policy have not been altered.

Ethical Channel Effectiveness

In 2024 there were 39 communications made through the Ethical Channel relating to ACCIONA Energía, of which, 30 were investigated while 9 were determined as not requiring investigation because they were outside the scope of the Ethical Channel (such as invoicing and commercial complaints). Two complaints were categorised under working conditions, relating to performance procedure and a professional category. None of the complaints related to modern slavery issues.

As a result of the investigations carried out, the Ethical Channel Committee proposed the adoption of various measures aimed at reinforcing the culture of ethics and compliance, such as training plans, coaching plans, review of processes or dismissals.

The number of communications made to the Ethical Channel has increased in 2024 by 178% compared to those made in 2023. The increase is considered to be due to improvement in the knowledge of, and increased trust in, the Ethical Channel.

ACCIONA Energía regularly assesses whether its staff members are aware of and trust these processes and structures. ACCIONA Energía conducts surveys and consultations to measure effectiveness and confidence in these mechanisms such as the Annual Compliance Survey. In 2024, questions relating to awareness of and confidence in the Ethical Channel obtained satisfaction scores of over 80%.

Compliance communication and training

ACCIONA Energía continued to implement its training and communication programme managed by the Compliance Department (**Compliance Training**). The aim of Compliance Training is to reinforce a culture of ethics and integrity in ACCIONA Energía.

In 2024, more than 200 communication actions were carried out, targeting the management team and all Acciona Energía employees through the intranet, e-mails, newsletters, face to face and on-line meetings, and the ACCIONA CAMPUS App. These communications addressed issues aimed at aligning their performance with the behaviour expected from and contractually committed to ACCIONA Energía.

Compliance Training includes a mandatory course for all ACCIONA Energía employees on the Code of Conduct and two mandatory courses for executives and managers called 'Fighting Corruption' and 'The Right Way to Work'.

The Annual Compliance Survey is also sent to all employees of ACCIONA Energía in order to ascertain their degree of understanding and familiarity with the internal regulations on ethics and compliance. In 2024, for the first time, additional mechanisms were established to strengthen the participation of employees without access to digital media. The results of the survey indicated that 96 % of employees are familiar with the Code of Conduct, 97% with the Anti-corruption Action Policy and 94% with the Ethical Channel Policy.

4.2 Management of Supply Chain Modern Slavery Risks

ACCIONA Energía applies rigorous due diligence processes before entering into contracts with possible suppliers. A key component of this due diligence process is the identification and assessment of modern slavery risks among prospective and current suppliers, contractors and collaborators. Our due diligence process is structured in the following seven stages:

1. Risk and impact identification and assessment;
2. Detection mechanisms;
3. Mitigation of actual and potential adverse human rights impacts;
4. Monitoring and continuous improvement;
5. Accountability;
6. Remediation; and
7. Collaboration with the authorities.

Where risks are identified, we have measures in place to address those risks. We acknowledge that we cannot identify all instances of modern slavery in our supply chains. Therefore, we have policies and procedures in place that aim to minimise unidentified instances of modern slavery.

Ethical Principles for Suppliers, Contractors, and Collaborators

ACCIONA Energía extends the scope of our commitment to ethics and human rights by disseminating a copy of the Ethical Principles Suppliers, Contractors and Collaborators document (**Ethical Suppliers Document**) to all suppliers, contractors and collaborators. They must respect human rights as defined in the internationally recognised standards (see item 2.2 above). Furthermore, suppliers, contractors and collaborators must ensure that, as far as it is possible, they are not complicit in any violation of these standards.

The Ethical Suppliers Document explicitly prohibits our suppliers, contractors, and collaborators from engaging in modern slavery. Suppliers:

- are prohibited from using all forms of forced labour as defined in the ILO Conventions 29 and 105;
- must not engage in child labour as defined in ILO Convention 138;
- must employ ethical, legal and voluntary recruitment practices;
- are bound by the requirements in the ACCIONA Group's Migrant Workers Welfare Standard;
- must offer fair, legal and equitable remuneration and employment conditions to their workers in writing, in a language the workers understand;

- must comply with laws, regulations and international standards for working hours; and
- are prohibited from any behaviour that is a manifestation of physical psychological, moral or sexual harassment, or that amounts to an abuse of authority.

Our contracts with suppliers include obligations relating to the ethical principles for suppliers and to sustainable procurement. 100% of ACCIONA Energía's orders and contracts specifically incorporate clauses on human rights standards and ethical principles.

The Supply Agreement states that a supplier must 'obtain and comply' with the UN Global Compact. The Supply Agreement also states that a supplier must:

"wherever reasonably possible, source all materials used in the Supply from ethically responsible suppliers and undertake the Supply in a way that supports internationally-recognised environmental sustainability practices."

Furthermore, a supplier must also:

"meet all internationally recognised standards in the areas of corporate ethics and transparency, human and social rights, health and safety, and quality and environment, and to not act (both in relation to the Supply and generally) in any way which does not accord to the laws and customs of the jurisdictions in which the Supplier operates."





The Supply Agreement provides Acciona Energía with a broad right to terminate a contract with a supplier if they breach the Supply Agreement by failing to comply with these principles, and do not remedy the breach within 10 days after receiving notice of the breach. Additionally, Acciona Energía may direct a supplier to suspend the carrying out of their obligations under the Supply Agreement for such time as Acciona Energía thinks fit.

While we do reserve the right to terminate any contractual relationship that fails to comply with the ethical principles, we prefer to provide an opportunity for suppliers that are in breach of these principles to make improvements. This is demonstrated through reinstating suppliers who make the required improvements.

Supplier Registration and Qualification Process

The global guide for supplier management (**Supplier Management Guide**) and the ancillary “Corporate Procedure for the Qualification and Evaluation of Suppliers” (together the **Procedures for Supplier Qualification**) describe the processes to be followed in supplier management as well as defining criteria for the registration and qualification of suppliers, contractors and collaborators who want to engage with ACCIONA Energía. Our Supply Chain processes are publicly available at <https://contractorprofile.accion-energy.com>. This portal was rolled out to global contracting in 2023. It also provides a log in for registered suppliers to manage their information.

A supplier must be registered on our SAP management system before they can supply to ACCIONA Energía. This is a database of ACCIONA Group suppliers and potential suppliers. In the case of suppliers that require a purchase order, ACCIONA Energía’s bidding and procurement negotiation management tool (PROCUR-e) is the only entry point to SAP. A supplier’s qualification status is calculated and recorded in PROCUR-e.

Once the potential supplier has been entered in PROCUR-e, the supplier will automatically be invited to GoSupply, an international supplier registration and classification database. Once invited, the supplier must accept the invitation and register in GoSupply. Globally, over 14,000 suppliers to ACCIONA Energía are now registered in GoSupply for

assessment and monitoring (consisting of 1,349 suppliers to the Reporting Entities). Over 64,000 suppliers are now registered in PROCUR-e for assessment and monitoring (consisting of 1384 suppliers to the Reporting Entities). 500 invitations were sent to potential suppliers of the reporting entities in 2024, resulting in 80 new supply contracts.

In order for a new supplier to be approved, the supplier agrees to comply with the 6 basic human rights standards. The standards take into account the following rights:

1. freedom of association and collective bargaining;
2. prevention of discrimination (based on sexual orientation, age, gender, marital status, level of education, political, ideological or religious convictions, origin or social status, physical or intellectual ability);
3. prevention of unacceptable disciplinary practices based on corporal punishment, physical or mental coercion, verbal abuse, harassment, workplace abuse of all kinds or unfair wage deductions;
4. guarantee that the hiring procedure is fair and provides a living wage to all workers;
5. the supplier contemplates and takes into consideration national regulations and is within the standards of the sector in terms of working hours; and
6. guarantee of non-participation or benefit from any type of child labour.

GoSupply segments suppliers based on the level of spend, as per the table below. The annual spend may be for a single contract or accumulated over the 12 months.

ANNUAL SPEND (AUD)	MINIMUM GOSUPPLY REGISTRATION	RESPONSIBLE SUPPLIER SELF-DECLARATION	COMPLY WITH NO GO POLICIES	QUALIFICATION
<\$25,000	Basic	✓	✓	
\$25,000–\$670,880	Advanced	✓	✓	
>\$670,880	360° Plus (Strategic supplier)	✓	✓	✓

All suppliers, regardless of spend level, must self-declare their acceptance of the ACCIONA Group Ethical Standards and international standards on human rights as mentioned above (**Responsible Supplier Declaration**). Compliance with provisions of the No Go policies (see section 4.2(e) and the status of the supplier's legal documentation (for example, whether the company has filed all documentation for its workers as required by local laws) are checked in the supplier registration process.

Prospective suppliers are also required to complete a questionnaire through GoSupply as part of registering as an ACCIONA Energía supplier (**On-boarding Questionnaire**). The On-boarding Questionnaire asks the prospective supplier to identify what supply chain control and due diligence mechanisms it has in place. All prospective suppliers must answer questions relating to compliance with international standards on labour rights, including a guarantee that the supplier does not participate in or benefit from any child labour. The On-boarding Questionnaire is more extensive for suppliers at the Advanced and 360° Plus level.

Suppliers tendering for single contracts greater than \$670,880 or which accumulate multiple contracts exceeding this value in a 12 month period are required to meet the more stringent qualification requirements. This ensures they are acting in accordance with our standards of transparency and business ethics, human and social rights, health and safety, quality and the environment. Once qualified, these companies are considered strategic suppliers and have a valid 'qualified' registration status for a period of 3 years, at which time renewal through the qualification process is required. The qualification criteria include minimum risk scores and additional due diligence of suppliers in high-risk countries including audits (see item 4.2(c) Risk Map). Fifteen new strategic suppliers were added in 2024 for the Reporting Entities.

Should a supplier fail to meet any of the qualification criteria, the supplier will be given time to resolve the issue before being re-evaluated based on evidence provided to ACCIONA Energía. ACCIONA Energía may decide to award provisional qualification for a short time period (for example 3 months) if the non-conformity is only minor. However, the non-conformity will need to be rectified before the qualification is extended.

ACCIONA Energía continuously monitors the performance of suppliers with respect to health and safety, quality, and environment, with ratings from 0 (lowest) to 4 (highest). At the end of a contract, the departments requesting the service/supply carry out an assessment of the performance of ACCIONA Energía's supply chain to obtain relevant data for future contracts. During 2024, 753 supplier performance

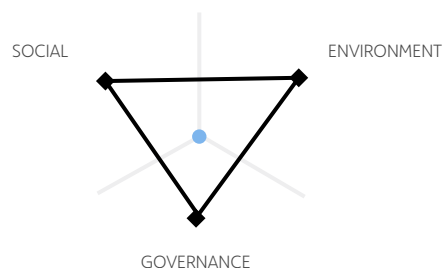
assessments were carried out with 94% of the assessments returning results of Type A (very recommendable supplier) or Type B (recommendable supplier). A new tool was identified in 2024 to streamline this evaluation process, and it will be implemented in 2025.

The Corporate University Supplier Campus is integrated into PROCUR-e and available free of charge to 100% of our supply chain. Throughout 2024, 21 suppliers completed 49 training courses out of those offered in the platform, with 12% of courses completed being related to human rights.

In 2024, the main actions carried out in relation to supply chain management systems were:

- Enhanced ESG methodology in GoSupply to meet European requirements under the Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSDD). The on-boarding questionnaire has been extended to cover ESG risk and opportunities, stakeholder impacts, social impacts to own staff and affected communities, and more aspects of environmental impacts. A Sustainability Dashboard in GoSupply also gives suppliers a snapshot of their ESG results.

SUSTAINABILITY SCORE			75
ENVIRONMENTAL 85	SOCIAL 79	GOVERNANCE 62	



- Ensuring access for suppliers to their ESG classification. The target was for 98% of strategic suppliers to have access to this information. This target was exceeded, with 100% of suppliers being able to consult this information on the GoSupply platform, through which the supplier is invited to carry out an improvement plan to develop and improve their ESG scoring.
- A control has been implemented prior to accepting tenders from contractors, requiring a minimum Health & Safety rating of 2 (on the 0-4 performance scale). In 2024, 100% of contracted suppliers met this minimum safety requirement and there were no purchases from suppliers with unacceptable safety performance.



Supply Chain Risk Map

ACCIONA Energía utilises the GoSupply international supplier registration and classification database to calculate a “risk score” for our prospective and current suppliers. The main objective of the Supply Chain Risk Map (**Risk Map**) is to know and detect risks within our supply chains, mitigate against those risks, control the relationship with suppliers and, especially, identify points of improvement in order to offer suppliers training and information if required.

The Risk Map utilises the Maplecroft data in the TPRGA Risk Country Table and the supplier’s answers to the GoSupply on-boarding questionnaire to produce risk scores in the following categories:

GOSUPPLY REGISTRATION	RISK MAP ASSESSMENTS						AUDIT
	ESG	Geopolitical	Compliance	Operational	Financial	Cyber	
Basic	✓	✓					
Advanced	✓	✓	✓	✓	✓		
360° Plus (Strategic)	>40%	✓	>60%	✓	>60%	✓	✓*

*Audit criteria apply

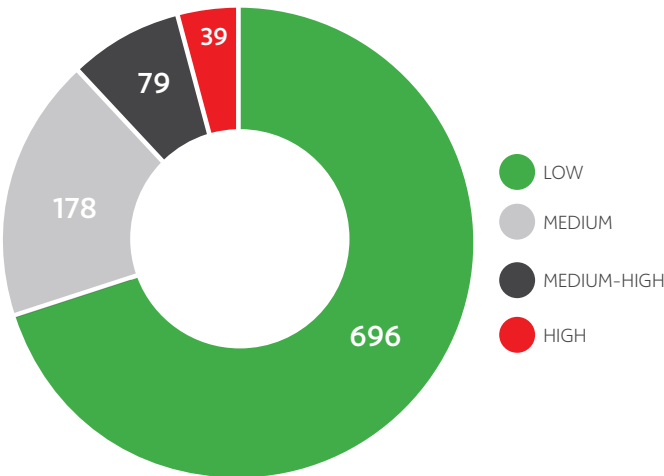
Geopolitical risk is assessed from various indices extracted from Maplecroft and GoSupply such as corruption, human rights, labour conditions and environmental legislation. Countries are scored from 1 (very low risk) to 5 (very high risk). Any prospective suppliers based in high-risk countries must undergo an audit prior to qualification.

Minimum acceptable scores for strategic suppliers are 40% for ESG risk, 60% for compliance risk and 60% for financial risk. In addition to meeting these minimum criteria, a supplier will have to comply with an ‘improvement plan’ and/or a Supplier Audit (see item below) if they score “high risk” in any of the risk score categories.

The Supplier ESG audit protocol includes investigation of that supplier’s performance related to human and fundamental rights, as well as their business processes for due diligence in their supply chain. In this way, we identify and manage risk deeper into our supply chain beyond our tier 1 suppliers.

GoSupply Australian supplier risk level

(includes all current and potential Australian suppliers registered in GoSupply, plus overseas suppliers to the reporting entities in 2024)





Enhanced Due Diligence

When potential human rights breaches are detected in the supply chain, we conduct enhanced due diligence (EDD) to assess the situation and the implications of such findings.

The EDD process allows the magnitude of the violations, their root causes and the parties involved to be identified, facilitating the implementation of appropriate corrective measures. This process reinforces the company's commitment to ethics and social responsibility, ensuring that the fundamental rights of workers and affected communities are protected.

In the second quarter of 2024, an alert was received through GoSupply from a Bloomberg report, indicating that solar panels manufactured in China, which were under suspicion of having been manufactured with polysilicon from the Xinjiang province, were being introduced into the US through India. As a result, ACCIONA Energía activated its mechanisms to control, prevent and avoid any involvement with products manufactured through forced labour. The actions carried out included:

- on-site audit of the potential Indian suppliers involved;
- an audit of the tier 2 suppliers of those potential Indian suppliers;
- the request prior to contracting for the traceability of the materials supplied; and
- regular monitoring of Indian suppliers of this type of material through GoSupply so that any new adverse media will trigger further EDD.

No Go Policy

ACCIONA Energía sets mandatory minimum standards for suppliers if they wish to be contracted by ACCIONA Energía. Suppliers that fail to comply with these policies are labelled "No Go suppliers". No Go suppliers will not have access to PROCUR-e and therefore will not be able to tender for projects.

A previously qualified supplier may also enter "No Go" status if they breach a No Go policy. In such a case, the supplier will automatically lose their qualification as an ACCIONA Energía supplier. A list of "No Go" suppliers is distributed to all ACCIONA Energía-related companies at least once a month.

Suppliers who find themselves in the following situations will be subject to the No Go Policies:

- suppliers with significant ethical and integrity risk, either because they are on international sanction lists or because they exhibit serious signs of corruption, fraud or money laundering;
- strategic suppliers in at-risk countries that have not been audited, or that have been audited and have one or more unresolved Serious Non-Conformity (SNC);
- suppliers who have demonstrated non-compliance with the United Nations Global Compact; and/or
- suppliers penalised due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

Given that a company when facing financial distress may be more likely to engage in unacceptable practices, including modern slavery practices, suppliers in the following circumstances are also to be subject to the No Go Policies:

- suppliers at risk of economic insolvency (for suppliers with total supply contracts of \$1,625,500 or more); and/or
- suppliers with debts to social security or taxation authorities.

A supplier may have its "No Go" status removed if they pass a Supplier Audit (see page 36), by complying with an Improvement Plan, or by Enhanced Due Diligence. The latter consists of an investigation into any adverse impacts detected, communication with the supplier to confirm the information, and verification of the resolution of the situation prior to entering into any new contract.

No Go Policy Effectiveness

At the beginning of 2024, there were 35 suppliers listed as “No Go” globally. During the year, 12 No Go suppliers exited No Go status and a further 15 suppliers entered No Go status. This means that at the end of 2024 there were 38 suppliers who were listed as No Go. Five suppliers to the Reporting Entities were moved into the No Go list in 2024. The same five suppliers were also moved out of the No Go list in 2024 following resolution of the issues identified.

Throughout 2024, 11 of the 38 No Go suppliers that had entered No Go status for not addressing their SNCs on time, managed to reverse their No Go status by applying various plans and actions aimed at the resolution of the SNCs. This included the five suppliers to the Reporting Entities. In accordance with its 2024 Sustainability Master Plan, ACCIONA Energía’s met its target of 0% of general purchase orders from companies who breach ACCIONA Energía’s No Go policies.

Dow Jones Risk Center Tool

The Dow Jones Risk Center tool (**DJRC**) is used to conduct due diligence of business partners or collaborators that fall outside of the GoSupply registration process for supplier management. This includes joint venture partners, consortiums and sponsorships. For once-off donations or sponsorships, the tool is used to check that there are no past incidents that may indicate unethical behaviour by the recipient. For ongoing contractual relationships, business partners are registered in the tool and an assessment is conducted of public information as well as information provided by the business partner. Areas of risk are identified and appropriate mitigation steps must be implemented. The tool constantly monitors registered parties and provides alerts if a breach occurs.

Supplier Audits

By signing and accepting the Responsible Suppliers Declaration, suppliers agree to collaborate with audits (**Supplier Audits**). Supplier Audits are carried out with the assistance of independent ESG compliance service provider GoSupply (which has merged with Achilles and was one of our previous service providers). Our audits are based on the ACCIONA Energía Supply Chain Audit Protocol. Supplier audits are carried out on:

- Tier 1 strategic suppliers (annual procurement over \$670,880) from high risk countries;
- Tier 1 strategic suppliers where the annual spend is over \$838,600 from any country; and
- Tier 2 suppliers covering at least 80% of the contracted supply amount of tier 1 supply contracts over \$8,386,000.

Among other areas of focus, a supplier ESG audit will examine a supplier’s:

- community relations;
- work environment;
- compliance with human and fundamental rights;
- treatment of human capital;
- quality of occupational health and safety;
- supply chain due diligence, including specific questions on traceability of materials that pose a higher risk;
- business ethics and integrity; and
- reputation.

If a serious non-conformity (defined as a legal breach or breach of an essential requirement for ACCIONA) (SNC) is detected during an audit, an improvement plan will be proposed to address the issue and the supplier must resolve the SNC within 3 months. A further 3 month extension to resolve the SNC may be provided for suppliers that demonstrate a willingness to comply with the Supplier Audit. During that period, the supplier will remain in a provisional approved status in PROCUR-e. However, if a supplier has more than 10 SNCs or fails to comply with the principles of the Global Compact, its status will be deemed “No Go”. Further, a supplier’s status will be deemed “No Go” if they have failed to resolve the SNC within the specified time, or failed to comply with an Improvement Plan within the specified time. SNCs are resolved by presenting evidence to the auditor for review and approval.

By signing the Responsible Suppliers Declaration, suppliers acknowledge that if they provide incorrect information during a Supplier Audit (or at any other stage) ACCIONA Energía reserves the right to automatically cancel any supplier contract.





Supplier Audit Effectiveness

In 2024, 171 supplier audits were conducted, with 155 audits carried out on direct suppliers globally. Audit results are valid for three years, and at the end of 2024 74% of strategic suppliers had a valid audit. Globally, 64% of the direct suppliers who were audited in 2024 had zero SNCs. The remaining 36% signed up for various action plans, of which 68% had fully resolved their SNCs at the end of 2024.

Eighteen Australian suppliers were audited in 2024, covering a range of industries. Of the 18 Australian suppliers who were audited, there were four SNCs discovered, two of which related to modern slavery risks. The two issues identified were:

1. one supplier had no reference to a minimum worker accommodation standard in their sub-contractor handbook; while
2. the other supplier did not have a process in place to prevent forced labour in its supply chain.

The four SNCs were subsequently resolved in 2024 through improved documentation and processes.

As a result of these audit findings, we have been able to encourage improvement in the relevant suppliers' processes, proactively ensuring that their risk of modern slavery is reduced.

Tier 2 Suppliers

Since 2018, ACCIONA Energía has also carried out audits of tier 2 suppliers according to the threshold criteria to safeguard its supply chain and mitigate risk of modern slavery. By the end of 2024, 16 audits had been conducted of tier 2 strategic cable and transformer suppliers, representing three tier 1 suppliers. Further, a new audit campaign of tier 2 suppliers to one additional strategic supplier of cables and transformers was launched which will be carried out and reported on in 2025.

COUNTRY	NUMBER OF TIER 2 AUDITS IN 2024
China	13
Spain	2
Germany	1

22 suppliers (both tier 1 and tier 2) from India and China (both deemed as high risk countries) were audited in 2024. SNCs were identified at four of these suppliers, all of which were from tier 2. Three of these SNCs related to social aspects, specifically ensuring that the supplier extended their child labour and human rights standards to their subcontractors and non-compliance with industrial safety laws, while the fourth SNC was an environmental issue. The audits carried out on suppliers of the Reporting Entities identified no breaches of human rights.

Improvement Plans

Where a SNC has been identified in an audit, the auditor will provide recommendations for improvement to meet legislative requirements and address the non-conformity. In addition, GoSupply automatically provides suggestions for improvement to all companies registered, to enable them to make proactive changes to their processes.

Supplier Insights - Example

ESG/SUSTAINABILITY | IMPROVEMENTS:4 | POSITIVE INSIGHTS:2

IMPROVEMENTS

- It is recommended to join the UN initiative that leads business sustainability worldwide at <https://www.pactomundial.org/>
- The new Directive on due diligence of companies in sustainability matters requires large companies to have a management system that ensures due diligence of their value chain. It is recommended that all companies, regardless of their size, begin to implement systems that guarantee their value chain.
- It is recommended to have a plan for the consumption of electricity from renewable sources.
- ISO 37301 Certified Compliance Management System or equivalent is recommended.

POSITIVE INSIGHTS

- Congratulations, your CSR policies make your company stand out.
- Having its own Code of Ethics or Code of Conduct has helped it to position itself as one of the most highly valued suppliers.

5. Assessing our Goals from 2024

We outlined several goals in our 2023 statement that we were looking to achieve in 2024. The below table outlines how we were able to achieve our goals in 2024.

GOALS FOR 2024	HOW THIS WAS ACHIEVED
Continuing the transition of remaining suppliers from the old Procurement assessment systems onto GoSupply and conducting audits for those suppliers meeting the audit required criteria.	We have continued to transition supplier assessments to GoSupply on an as-needs basis. 35 companies have not yet been transitioned because we have not purchased from them since the system change. They will complete the process before any further purchases are made. The number of Supplier Audits has increased from 9 in 2023 to 18 in 2024 (for the Reporting entities), as we continue our audit program for those suppliers meeting the audit criteria.
The carrying out and reporting of the new Tier 2 supplier audit campaign.	The tier 2 audit campaign of three tier 1 suppliers was completed, with a total of 16 tier 2 audits completed.
The rolling out of the new Improvement Plan Submission module in GoSupply.	An Improvement Plan has been created for suppliers which need to improve their ESG score above 40 in order to qualify. Progress against the Improvement Plan is monitored so that the supplier can be approved once the improvements are made.
The improvement of current ESG risk methodology.	ESG questions in the GoSupply on-boarding questionnaire have been extended to cover ESG risk and opportunities, stakeholder impacts, social impacts to own staff and affected communities, and more aspects of environmental impacts. A Sustainability Dashboard in GoSupply also gives suppliers a snapshot of their ESG results. We have also implemented a control prior to accepting tenders from contractors requiring a minimum health and safety rating.

6. Looking Ahead

In 2025 we are continuing to build on our goals from last year as outlined above in section 5 and meet the objectives of our Sustainability Master Plan 2021-2025, while developing the next Sustainability Master Plan.

Globally, the challenges for 2025 in the supply chain risk management process include:

- Continuing to encourage suppliers to manage and disclose up to date information regarding their supply chains via their portal log-in on the Contractor Profile (described above in section 4.2 of this Statement) and to make ACCIONA Energía's procurement criteria (including human rights standards) known;
- maintaining audits of tier 2 suppliers for tier 1 equipment supply contracts worth more than EUR5 million (\$8,386,000), covering at least 80% of the supply;
- review of sustainable procurement criteria and, if possible, system automation to facilitate control; and
- automation of supplier performance appraisals.



7. Modern Slavery Reporting Checklist

Modern Slavery Act 2018 (Cth): (Act)

REQUIREMENT	REFERENCE	MSS REFERENCE
TIMELINE Must be provided to the minister within 6 months after the end of the reporting period for the entity	S 13(2)(e), 14(f)(i) Act	Required submission date is 30 June 2025
REPORTING ENTITIES Identify the reporting entity/entities	S 16(1)(a) Act	Section 1 (About this Statement)
CONSULTATION Describe the process of consultation with: - any entities that the reporting entity owns or controls; and - in the case of a reporting entity covered by a statement under section 14 (joint statement)—the entity giving the statement.	S 16(1)(f)(i) Act S 16(1)(f)(ii) Act	Section 1.2 (Consultation)
STRUCTURE OF OPERATIONS AND SUPPLY CHAINS Describe the structure, operations and supply chains of the reporting entity.	S 16(1)(b) Act	Section 3.1 (Structure), Section 3.2 (Operations), Section 3.3 (Supply Chain)
RISKS OF MODERN SLAVERY Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	S 16(1)(c) Act	Section 3.4 (Modern Slavery Supply Chain Risks)
ACTIONS TAKEN TO ASSESS AND ADDRESS Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including: - due diligence; and - remediation processes.	S 16(1)(d) Act	Section 4.1 (Our Commitment to Modern Slavery Risk Management)
ASSESS EFFECTIVENESS OF ACTIONS Describe how the reporting entity assesses the effectiveness of such actions	S 16(1)(e) Act	Section 4.1 (Our Commitment to Modern Slavery Risk Management), Section 4.2 (Management of Supply Chain Modern Slavery Risks)
JOINT STATEMENT APPROVAL Must be approved by principal governing body of: (i) each reporting entity covered by the statement (including details of approval and signature of a responsible member for each reporting entity); or Signatures may be electronic (s 10 Electronic Transmissions Act 1999)	S 14(2)(d)–(e) Act S 16(2)(b)(i), (ii) Act	Section 1.2 (Consultation)

