

Modern Slavery Statement

2025



Acknowledgement of Country

We acknowledge the Traditional Owners of the Land on which we operate and their continuing connection to the land, water and community.

We acknowledge that Aboriginal and Torres Strait Islander people have survived practices that we now call modern slavery, and that the legacies of that treatment continue to affect them and their communities today.

We pay our respects to all Aboriginal communities, their cultures and to Elders past and present.

We acknowledge their enduring care of Country — the lands, skies, waters, and all living things — and recognise their knowledge as vital to the sustainable future we are working towards.

We recognise that Country is alive — with energy, spirit and knowledge flowing through.

As an electricity utility, we reflect on the energy we harness and share across this region, and we strive to do so in a way that respects and protects the living energy of Country.

We are committed to listening, learning and working together with Aboriginal peoples, and we endeavour to honour their enduring custodianship and our shared responsibility to protect and respect Country now and for generations to come.

About this statement

This document constitutes the Modern Slavery Statement (Statement) of Electricity Generation and Retail Corporation (ABN 58 673 830 106), trading as Synergy (Synergy).

It has been prepared to meet our obligations under the *Modern Slavery Act 2018* (Cth) (the Act) for the financial year ending 30 June 2025.

This Statement outlines our structure, operations and supply chains; the modern slavery risks inherent within them; the actions we have taken to assess and address these risks; the methods we use to assess the effectiveness of our actions; and our forward-looking commitments to continuous improvement.

It is made on behalf of Synergy, Synergy's wholly owned subsidiary South West Solar Development Holdings Pty Ltd (ACN 152 749 936) (SWSDH) and SWSDH's subsidiary Synergy Renewable Energy Developments Pty Ltd (ACN 152 752 719) (SynergyRED) which have been engaged and consulted in the development of this statement, and in relation to modern slavery risks in their operations and supply chains.

Our comprehensive governance requirements extend to these subsidiary entities, including in the context of procurement and risk management.

This ensures a uniform approach to managing operational and supply chain risks, including the management of modern slavery risks as described throughout this Statement.

The Statement was approved by Synergy's Board (principal governing body) on 29 November 2025.

It will be published on the Australian Government's Modern Slavery Register and made available on Synergy's website.



Michelle Shepherd
Chair



Cover image:
Muja Power Station team members at Stockton Lake, the site of a former open-cut mine that has been transformed into a popular recreational area 7 km east of the Collie township.

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Innovate Reconciliation Plan Artwork

This artwork was created by artist Dana Garlett, a Whadjuk, Nyikina, Minang, Ballardong yorga (woman) of Western Australia and Buffie Punch, a Noongar yorga who was born in Albany and has family connections in Gnowangerup. It captures the powerful flow of energy that sustains us all and highlights the importance of renewable energy and its role in building a sustainable future for generations to come

Our human rights commitment

Synergy is committed to upholding human rights and strengthening our practices to combat modern slavery risks across our value chain.

Our goal is to conduct business in a way that safeguards our people, contractors and the communities in which we operate and serve.

We recognise that human rights and modern slavery risks are interconnected and complex. Eliminating these risks cannot be achieved in isolation; it demands collaboration across our organisation and with external stakeholders, including those beyond our sector.

Modern slavery is a term used to describe serious forms of exploitation, and includes, without limitation, trafficking in persons, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services and the worst forms of child labour.



Mandatory reporting criteria

Navigating this document

Applicable provision of the Modern Slavery Act 2018 (Cth)	Mandatory reporting criteria guidance for reporting entities	Location in document
s 16(1)(a)	Criteria one: Identify the reporting entity.	About this statement (Inside cover)
s 16(1)(b)	Criteria one and two: Describe the reporting entity's structure, operations and supply chains.	About this statement (Inside cover) About Synergy (8–12)
s 16(1)(c)	Criteria three: Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities the reporting entity owns or controls.	Understanding our risk landscape (13) Our approach (16–17) Identifying and assessing (18–21)
s 16(1)(d)	Criteria four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Taking action (22–24)
s 16(1)(e)	Criteria five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery.	Measuring effectiveness (28)
s 16(1)(f)(i)(ii)	Criteria six: Describe the process of consultation with any entities the reporting entity owns or controls.	About this statement (Inside cover)
s 16(1)(g)	Criteria seven: Any other relevant information.	Looking ahead (29)



Message from the CEO

At Synergy, we recognise the essential role that energy plays in peoples' lives and are guided by a strong commitment towards a sustainable, fair and ethical energy future.

As we progress, we are focused on understanding and addressing the elevated risk of modern slavery across renewable energy supply chains.

Strengthening our practices to combat all forms of modern slavery is a priority at the highest levels of the organisation.

We understand that modern slavery cannot be eliminated in isolation. Collaboration within Synergy and with external stakeholders is essential.

Supporting local communities is central to our approach. In 2024–25, 70 per cent of our procurement spend was directed to suppliers based in Australia, reinforcing our commitment to local and economic social value.

At the same time, by actively engaging with overseas suppliers, we have the opportunity to influence global supply chains where elevated risks of modern slavery exist.

This year, Synergy is proud of the achievements we have made across our key initiatives as outlined in this Statement.

We have also strengthened engagement with previously unresponsive suppliers, gaining valuable insights into modern slavery risks.

However, challenges remain in building consistent, transparent collaboration across global supply chains.

Synergy is committed to improving visibility beyond tier one suppliers, despite ongoing difficulties with data access, transparency and supplier capability. We recognise that enhanced traceability is key to addressing modern slavery risks.

We also remain vigilant to shifts in risk levels. All transactions continue to be assessed and higher-risk tenders face tighter controls and regular assessment.

Over the next year, our objectives will focus on strengthening governance, deepening supplier engagement and improving traceability across supply chains.

We will continue working closely with our Board and the Western Australian Government to uphold our commitment to combating modern slavery and protecting human rights across our operations and supply chains.

Kurt Baker
Chief Executive Officer

Key initiatives

2024–25



Developed a targeted risk tool for high-risk and high-value tenders, enhancing the pre-qualification process through consultation with Synergy’s Risk business unit. This tool supports early identification of potential modern slavery risks and ensures appropriate mitigation strategies are embedded from the outset.



Led modern slavery training workshops with government partners to support a shared understanding of supply chain risks during the energy transition, with a focus on sustainability, values alignment, and collaborative risk management.



Integrated fuel suppliers into Synergy’s modern slavery risk processes, expanding visibility into a critical and complex supply chain segment.



Reviewed and strengthened contract clauses related to modern slavery, including the introduction of Human Rights Risk Management Plans (HRRMPs) as contractual obligations for higher-risk engagements — reinforcing accountability and supplier compliance.



Explored options for deeper due diligence on higher-risk tenders, including potential on-site investigations, to strengthen Synergy’s ability to detect and respond to red flags in supplier practices.

About Synergy

Alongside its customers, Synergy is on a journey towards a more sustainable energy future.

Synergy is Western Australia's largest electricity generator and energy retailer serving more than 1.2 million customers throughout the South West Interconnected System (SWIS), which extends from Kalbarri in the north to Kalgoorlie in the east and Albany in the south.

Synergy is the only retailer for all customers within the SWIS who consume less than 50 megawatt hours (MWh) of electricity per year, as defined in the Electricity Corporations (South West Interconnected System Prescribed Customers) Order 2023, which is subsidiary legislation under the *Electricity Corporations Act 2005 (WA)*.

Synergy also supplies electricity to customers who consume more than 50 MWh per annum on a competitive basis with other retailers.

We are committed to working together towards a climate-resilient and prosperous lower carbon future for our communities, acknowledging the scientific consensus on climate change and the need for a transition to a net-zero society.

Through current and future projects, we are supporting the Western Australian Government's emissions reduction goals through Synergy's own ambition to reduce our carbon emissions by 80 per cent from 2020 levels by 2030 and achieving net-zero emissions by 2050.

This means developing new renewable energy generation and storage solutions to replace state-owned coal-fired power stations, which will be retired by 2030.

Throughout this transition, we are committed to helping customers better manage their energy usage and contain their costs, without compromising the provision of reliable energy.

As a people-led organisation, our employees, customers, community and stakeholders are at the forefront of everything we do.



Greenough River Solar Farm is owned and operated by Bright Energy Investments, a joint venture between Potentia Energy and the Western Australian Government through Synergy.



Albany Grasmere Wind Farm, owned and operated by Bright Energy Investments, a joint venture between Potentia Energy and the Western Australian Government through Synergy.

Our corporate structure and governance

As a WA Government Trading Enterprise (GTE), Synergy is established under the *Electricity Corporations Act 2005 (WA)* and governed by the *Government Trading Enterprises Act 2023 (WA)*.

This legislation outlines Synergy's powers, functions and operational restrictions.

As well as the parent entity, Synergy's structure includes two wholly owned subsidiaries:

- South West Solar Development Holdings Pty Ltd (SWSDH)
- Synergy Renewable Energy Developments Pty Ltd (SynergyRED)

SynergyRED was launched in 2018 as a wholly owned subsidiary of SWSDH, which is itself a wholly owned subsidiary of Synergy.

SynergyRED is responsible for exploring, scoping, developing, and expanding a range of renewable energy projects, including wind and solar power generation assets and large-scale battery storage projects.

As of 30 June 2025, Synergy's workforce comprised a total of 1,252 people, including:

- 1,108 individuals directly engaged by Synergy.
- 144* contractors working across various operational and support functions.

Of the directly engaged workforce, 43 per cent are covered by a collective bargaining agreement, reflecting our commitment to fair and transparent employment practices.

Synergy's employees are primarily located across four key sites: Perth, Kwinana, Pinjar and Collie.

**Excluding service and third-party contractors.*

Our operations

Synergy's operations span electricity generation, retail energy services, project development and infrastructure delivery.

This includes a broad generation and storage portfolio comprising coal and gas power stations, wind and solar farms, as well as battery energy storage systems (BESS).

We continue to actively explore renewable energy generation and storage opportunities aligned with the Western Australian Government's energy transition plans.



¹ Owned and operated by Bright Energy Investments (BEI).
² Provides electricity solely to Coral Bay. Does not feed electricity into the SWIS.
³ Provides electricity solely to Hopetoun. Does not feed electricity into the SWIS.

Generation

Our assets include

Major coal-fired power stations near Collie

Major gas-fired power stations in Kwinana, Cockburn and Pinjar

Smaller gas-fired power stations in Mungarra and West Kalgoorlie

Wind farms in Albany*, Warradarge* and Kalbarri

Wind-diesel systems in Bremer Bay, Coral Bay, and Hopetoun; and

A solar farm near Geraldton*

**Owned and operated by Bright Energy Investments Pty Ltd, a Synergy joint venture with Potentia Energy in which we retain a 19.9 per cent stake.*

Battery storage

Battery storage is supporting the ongoing uptake of rooftop solar panels and the construction of additional large-scale renewable generation assets.

Kwinana Battery Energy Storage System 1 (KBESS1)

Began commercial operation in **May 2023**

100 MW / 200 MWh

Kwinana Battery Energy Storage System 2 (KBESS2)

Began commercial operation in **March 2025**

225 MW / 900 MWh

Collie Battery Energy Storage System (CBESS)

Expected to begin commercial operation by late **2025**

500 MW / 2000 MWh

Wind farm projects

Work on Synergy's first fully owned wind farm in more than 15 years, King Rocks Wind Farm, began in May 2025.

In addition, the expansion of Warradarge Wind Farm, owned by Bright Energy Investments Pty Ltd (BEI), a joint venture between Synergy and Potentia Energy, is underway and is expected to come online in 2027.

The two projects will support the retirement of state-owned coal power stations by 2030.



King Rocks Wind Farm
expected completion

Year
2027 / 105 MW

Warradarge Wind Farm 2
expected completion

Year
2027 / 103 MW

Distributed energy resources

Rooftop solar systems have been installed by more than 450,000 customers across the SWIS. Together with home batteries, these systems play a key role in WA's renewable energy future.

Known as distributed energy resources (DER), Synergy is working to enable the coordination of these household energy assets so they can be linked together to form virtual power plants.

Virtual power plants use software and communications technology to share surplus energy between customers as well as the SWIS.

By participating in a virtual power plant, households can help make the energy system more reliable and sustainable.



41.03%

households with rooftop solar
(450,863 homes)



64%

of our electricity needs across the SWIS can be supplied by rooftop solar on a sunny day

Power purchase agreements

Synergy's existing renewables portfolio includes power purchase agreements (PPAs) managed through our joint venture with BEI and third-party energy suppliers.

The arrangements give Synergy the ability to increase our supply of electricity by purchasing additional requirements from other renewable energy generators within the SWIS.

Trading electricity

As one of many generators in the SWIS, Synergy participates in Western Australia's Wholesale Electricity Market (WEM).

The WEM is operated by the Australian Energy Market Operator (AEMO), which facilitates the matching of real-time demand for electricity with the lowest cost sources of generation, while maintaining system security and reliability.



Greenough River Solar Farm is owned and operated by Bright Energy Investments, a joint venture between Potentia Energy and the Western Australian Government through Synergy.

Understanding our modern slavery risk landscape

The Western Australian Government's energy transition plan is reshaping Western Australia's energy future.

In alignment with the State Government's Energy Transformation Strategy, which includes investing in renewable energy infrastructure assets throughout the SWIS, Synergy is continually exploring opportunities to expand and diversify its fleet of generation assets.

By 2030, Synergy will retire its remaining state-owned coal-fired power stations and complete over \$3 billion in new renewable energy infrastructure, including wind farms and battery energy storage systems.

Synergy has completed two battery energy storage systems at Kwinana (KBESS 1 and 2) and is expected to complete the commissioning of the Collie BESS by the end of 2025. Additionally, it is currently constructing the King Rocks Wind Farm as well as expanding Warradarge Wind Farm, an asset owned by Bright Energy Investments (BEI), which is a joint venture between Potentia Energy and Synergy.

This transformation places Synergy at the forefront of the global energy transition. It also increases our exposure to renewable energy supply chains, which are recognised as having elevated risks of modern slavery.

These risks are particularly concentrated in the extraction of raw materials (such as cobalt and lithium), manufacturing and assembly processes. These often occur in regions with weak labour protections and limited transparency.

Our Modern Slavery Strategy guides our procurement and supply chain engagement to ensure our actions are transparent, defensible and sustainable.

Synergy also recognises its responsibility to deliver on the decarbonisation agenda in a way that creates value for the people of Western Australia.

Our strategy supports this commitment by guiding our approach to supply chain engagement and procurement. It helps guide our actions so they reflect our values and our role in shaping a fairer energy future.



Procurement expenditure by geography

Synergy's supply chain supports a broad range of operational and strategic activities across energy generation, infrastructure, technology and services.

Our decision to prioritise Australian-based suppliers reflects our commitment to supporting the local economy and acknowledgement of the increased risks of modern slavery in global supply chains.

In 2024–25, 48 per cent of the organisation's spend was based in Western Australia.

This is representative of our focus on building resilient, regionally grounded supply chains that contribute to local job creation, economic development and community wellbeing.

The Collie community received six per cent of Synergy's spend. This reflects our active support of communities and workers affected by the transition from traditional energy sources towards more sustainable models.

The FY25 expenditure of Synergy's wholly owned subsidiary SynergyRED, was \$9 million, across 55 suppliers, primarily covering environmental, Aboriginal heritage and feasibility consultancy services.

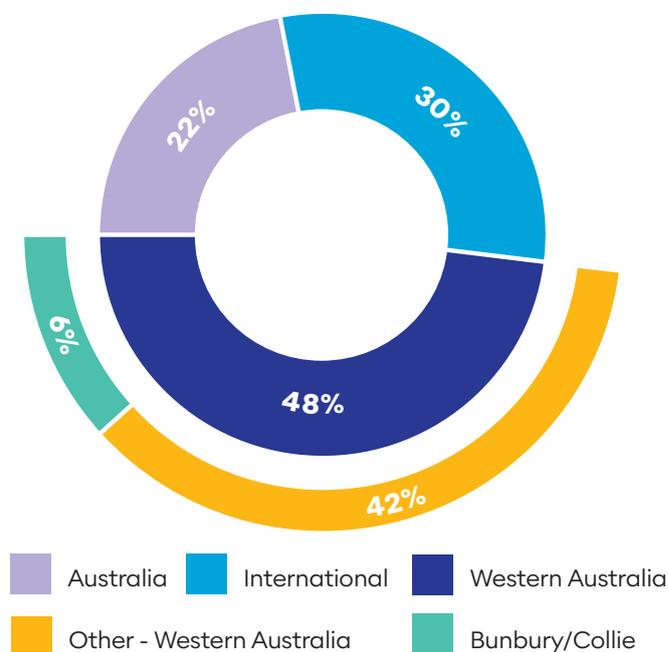
These suppliers play a critical role in enabling responsible development and ensuring cultural and environmental considerations are embedded in Synergy's renewable energy transition.

Synergy's extended supply chain includes non-contestable arrangements, such as Power Purchase Agreements (PPAs) and wholesale energy supply contracts. These are typically long-term or regulated agreements that fall outside standard competitive procurement processes and are therefore excluded from contestable spend figures.

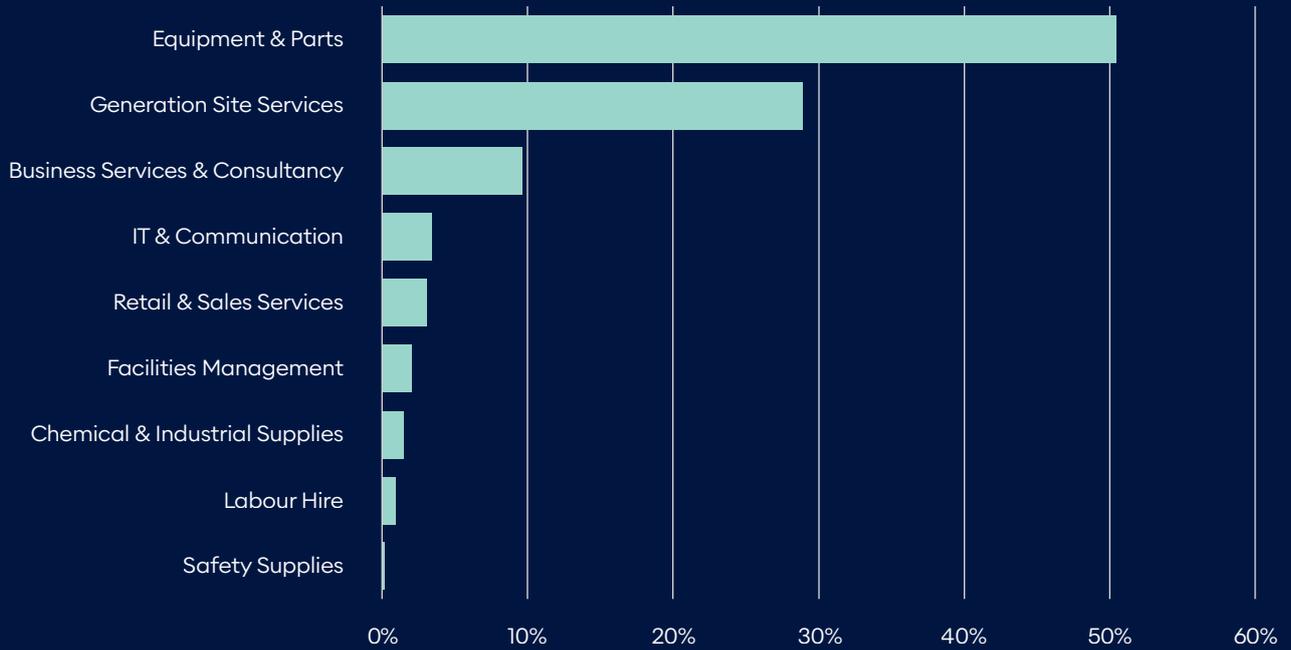
While these arrangements are not part of Synergy's direct procurement reporting, they are increasingly being assessed for modern slavery risks. Synergy recognises the importance of ethical sourcing across the full value chain and is working to ensure that modern slavery considerations are embedded in all supplier relationships, including those governed by non-contestable contracts.



Spend by region (% of total spend)

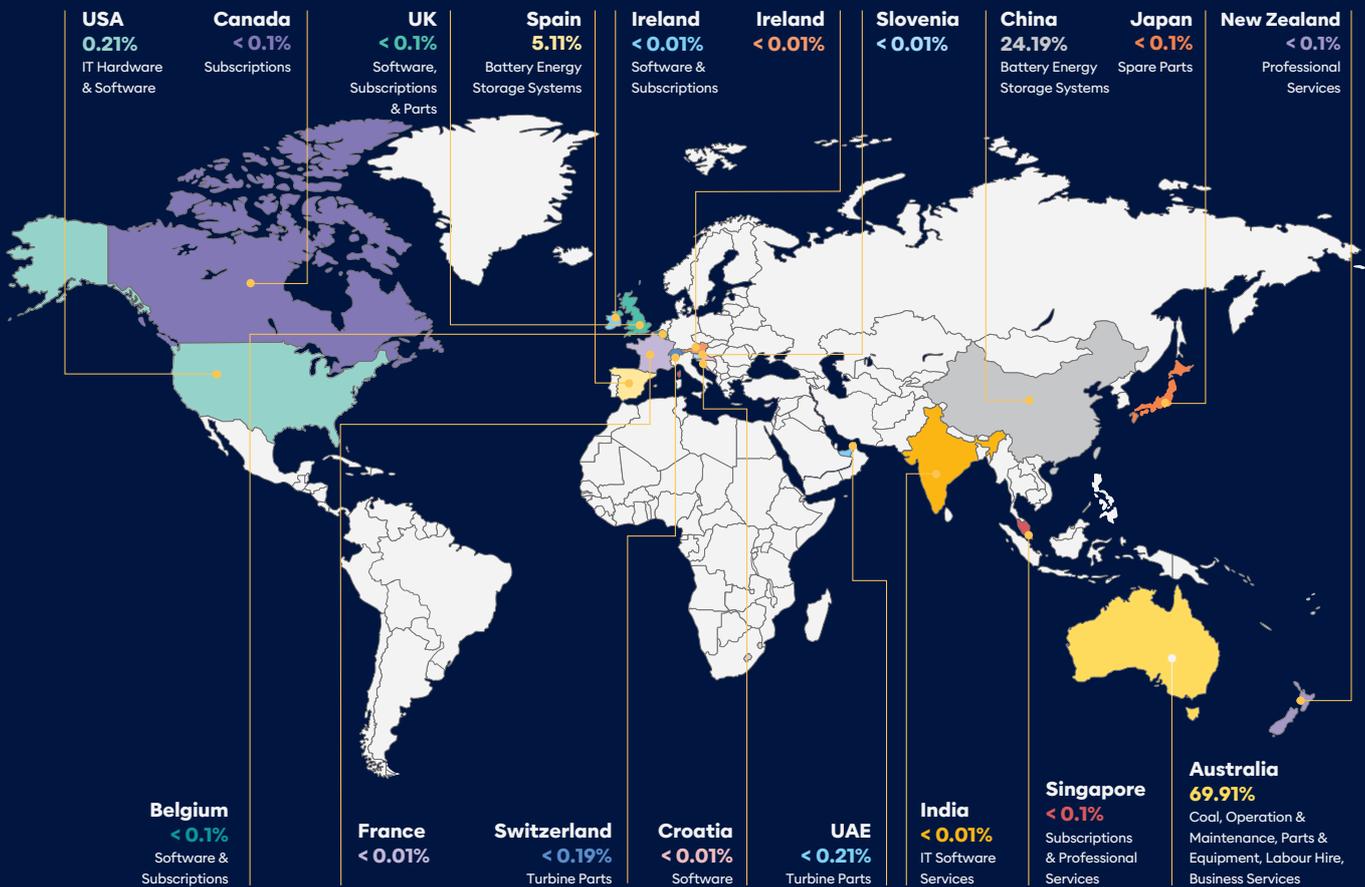


Top spend categories (% of total spend)



International spend by country (\$AUD)

This map identifies spend by region based on our tier 1 (direct supplier) location.



Our approach to modern slavery risks

Our modern slavery response framework

Synergy's commitment to addressing modern slavery risks is embedded at the highest levels of our organisation.

From our corporate strategy, anchored by our Social Value strategic pillar, through to our governance structures and operational practices, we take a top-down approach to identifying, assessing and mitigating modern slavery risks across our operations and supply chains.



Leadership and accountability

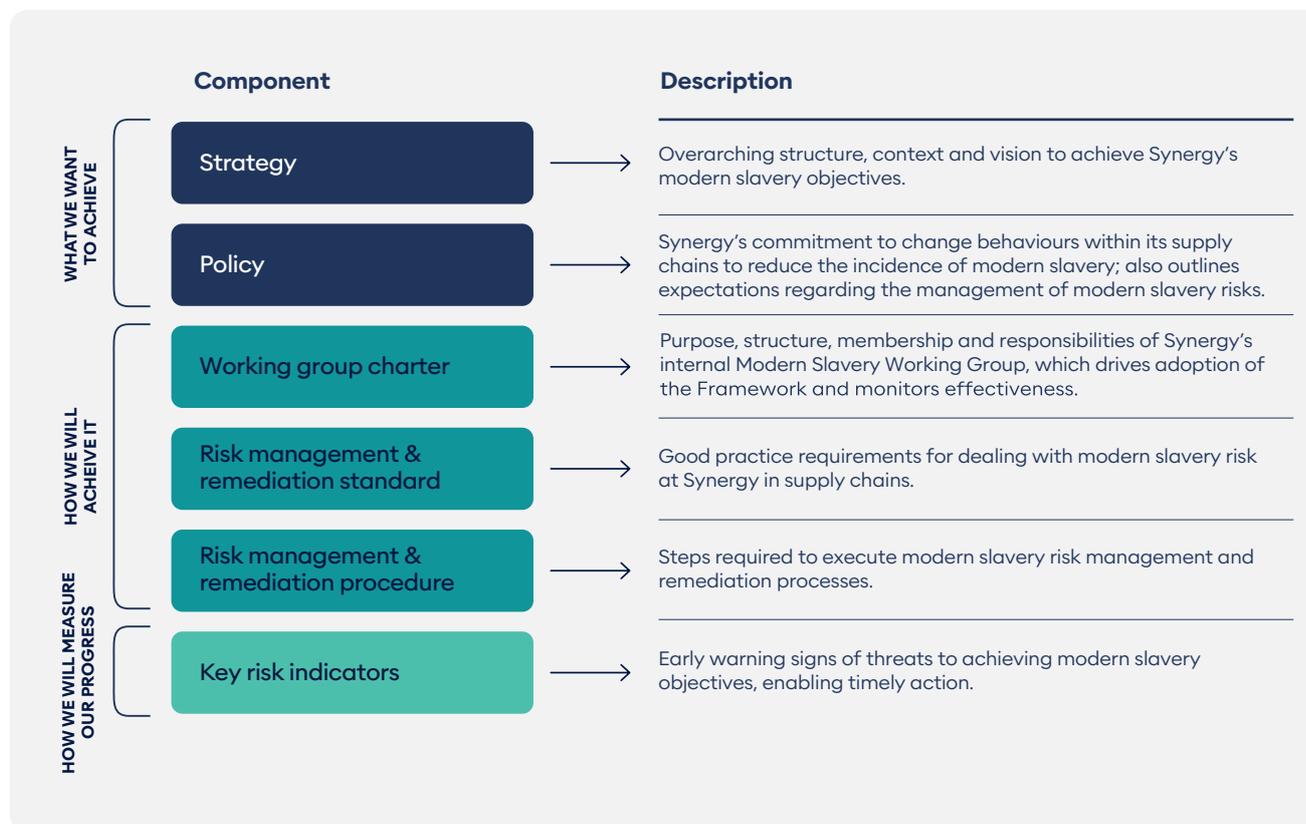
Synergy is committed to a strong governance framework that ensures accountability and oversight in addressing modern slavery risks across our operations and supply chains.

- **Board oversight:** The Board sets the organisation's risk appetite and tolerance in relation to modern slavery. It holds ultimate accountability for ensuring that Synergy and its subsidiaries meet all legal and ethical obligations in this area.
- **Executive Leadership Team (ELT):** The ELT is responsible for implementing the Board's direction and ensuring that Synergy and its subsidiaries comply with modern slavery legislation and uphold ethical standards in practice.
- **Management responsibility:** Managers at all levels are accountable for promoting awareness and understanding of our Modern Slavery Policy and related procedures among their teams. They are responsible for ensuring that employees under their supervision comply with our modern slavery commitments.

This leadership structure ensures that responsibility for identifying, managing and mitigating modern slavery risks is embedded throughout the organisation.

Governance framework

Synergy’s Modern Slavery Response Framework is designed to ensure a structured, consistent and measurable approach to identifying and addressing modern slavery risks across our operations and supply chains. The framework is organised into three key layers.



We employ a systematic framework to effectively identify and assess the modern slavery risks posed by supply chains, make appropriate supplier engagement decisions and implement appropriate risk controls, including remediation where applicable.

This methodology integrates four key themes of analysis:

- 1. Industry risk:** Includes industries involving people who may have a higher risk of harm due to language, literacy or education characteristics, or higher risk business models (including offshore services, labour hire, or other services involving migrant workers).
- 2. Category risk:** Exploitative labour practices are more likely in particular supply chain categories, such as solar panels, wind turbine components, electronics and textiles.
- 3. Commodity risk:** Identification of high-risk areas further down the supply chain, into the raw materials and minerals such as polysilicon, cobalt, metals, copper and rare earths.
- 4. Country risk:** High risk geographies are typically characterised by conditions including a weak rule of law, high levels of corruption or conflict and other factors such as internal displacement of people, high cross-border migration and regional or remote areas.

This structured framework allows us to concentrate our resources on the most severe and likely risks of human rights harm within our value chain.

Identifying and assessing modern slavery risks

This year's review of our operations and supply chains reaffirmed the elevated risk areas identified in Synergy's previous modern slavery statement for the financial year ending 30 June 2024.

While the nature of our operations and procurement activities has not materially changed, our risk profile continues to be shaped by the complexity and global reach of certain supply chains, particularly in the renewable energy and services sectors.

Building on this review, Synergy committed to targeted efforts to strengthen engagement with suppliers on modern slavery risk.

While this represents a meaningful step forward, we acknowledge that supplier engagement remains inconsistent and ongoing challenges persist in fostering sustained and transparent dialogue across our supply chain.

We recognise that visibility beyond Tier 1 suppliers is critical to effectively identify and mitigate modern slavery risks. However, significant barriers in accessing reliable data remain.

These include limitations in supplier systems and infrastructure for supply chain mapping and a lack of transparency from some suppliers.

Despite these challenges, we remain committed to improving sub-tier visibility and will continue to explore tools, partnerships and frameworks that support enhanced traceability and risk mapping.

These efforts could provide valuable insights into supplier practices, risk indicators and areas for improvement.

We also recognise that building trust and driving meaningful collaboration requires a long-term approach.

Our goal is to create a more inclusive and responsive supplier network that actively contributes to identifying and addressing modern slavery risks.



Risk assessment of current and future suppliers

Synergy continues to engage a third-party environmental, social and governance risk analytics platform to support our supply chain risk assessment process.

During the year, the platform was used to assess the modern slavery risks in the operations and supply chains of 506 current and potential suppliers participating in a tender process.

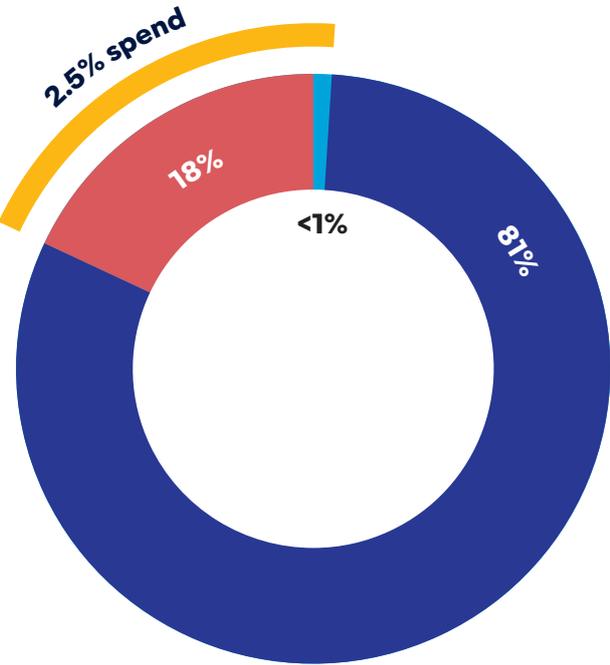
The majority of suppliers (81 per cent) were rated as low risk. The remaining 19 per cent of suppliers identified as low-moderate or moderate risk represented 2.5 per cent of the total spend among risk-assessed suppliers.

Year on year comparison

There was a two per cent increase in the proportion of suppliers rated as low risk, while those rated low-moderate and moderate decreased slightly.

This shift suggests a modest reduction in overall supplier risk exposure, despite continued engagement with higher-risk renewable energy supply chains aligned with Synergy's decarbonisation strategy.

Supplier risk profile 2024-25 506 suppliers assessed



Low risk Low-moderate Risk Moderate risk





Supplier engagement

During 2024–25, 185 suppliers were issued a Supplier Assessment Questionnaire (SAQ), through the tendering and ongoing due diligence processes.

This equated to almost half of Synergy's top 500 suppliers (based on spend), including all suppliers with moderate or moderate-low risk ratings.

Notably, the 2024–25 SAQ process was expanded to include wholesale fuel suppliers, reflecting stronger internal collaboration and a comprehensive approach to risk assessment.

Risk appetite levels

Synergy's risk appetite levels are guided by the understanding that modern slavery risks are dynamic and may shift as our supply chain evolves, especially in the context of our transition to renewable energy and increased international sourcing.

The levels acknowledge the inherent risks associated with all goods and services we procure.

Accepting these risks does not imply acceptance of modern slavery practices.

Synergy's assessment of risk level is iterative and continues to be strengthened as we apply our framework to our risk identification and mitigation processes.

The processes pay particular attention to supplier engagement, data-driven risk profiling and expanding visibility into higher-risk categories.

Categories with elevated risk

The following categories continue to present elevated risks of modern slavery due to factors such as complex global supply chains, reliance on low-skilled or migrant labour and sourcing from regions with weak labour protections.

Synergy remains committed to ongoing due diligence and supplier engagement to monitor and address these risks.

While the risk profile of these categories has not changed, our vigilance and response strategies continue to evolve to ensure ethical and responsible sourcing.



Category	Elevated risk factors
Electrical equipment (including battery energy storage systems)	Involves complex supply chains with components sourced from multiple countries. Risks include raw material extraction (e.g., cobalt and lithium mining), which has been linked to child labour and poor working conditions.
Turbine equipment	Involves large-scale industrial operations. Risks include low-skilled labour, reliance on outsourcing, and operations in countries with weak labour laws. Components such as steel and electronic parts are often sourced from high-risk regions.
Fabricated metals	Requires significant quantities of raw materials often sourced from high-risk areas. Risks include forced labour in mining, poor working conditions in manufacturing plants, and the use of subcontractors who may not adhere to ethical labour practices.
Construction	The industry is known for reliance on low-skilled labour and subcontracting. The use of temporary and migrant workers, who are often vulnerable to exploitation, elevates the risks. Additionally, construction materials (e.g. steel) are often sourced from regions with poor labour practices.
Computing equipment	Production involves complex supply chains with significant risks in raw material extraction (e.g., conflict minerals sourced from regions affected by conflict and human rights abuses), manufacturing, and assembly processes. Countries involved in these processes often have weak labour protections, and there is a high reliance on low-skilled, low-wage labour.
Offshore services (including IT and customer support)	Often based in countries with lower labour costs and less stringent labour laws. Risks include forced labour, excessive working hours, and poor working conditions.
Facilities management	Involves services like cleaning, maintenance, and security, which are often filled by low-skilled, low-wage workers, including migrants, who are vulnerable to exploitation. The use of subcontractors further increases the risk of poor labour practices.
Labour hire	Companies supply workers across various sectors, often for temporary or seasonal work. This category is particularly high-risk due to the potential exploitation of temporary workers, especially migrants. Risks include underpayment, poor working conditions, and lack of job security, potentially leading to forced labour and other forms of modern slavery.

Taking action to combat modern slavery

Supplier engagement and expectations

Synergy works with suppliers to raise awareness, provide clarity around our modern slavery expectations and build shared understanding of risk.

Our General Conditions of Contract reinforce our commitment to ethical sourcing and human rights by embedding modern slavery compliance into supplier agreements.

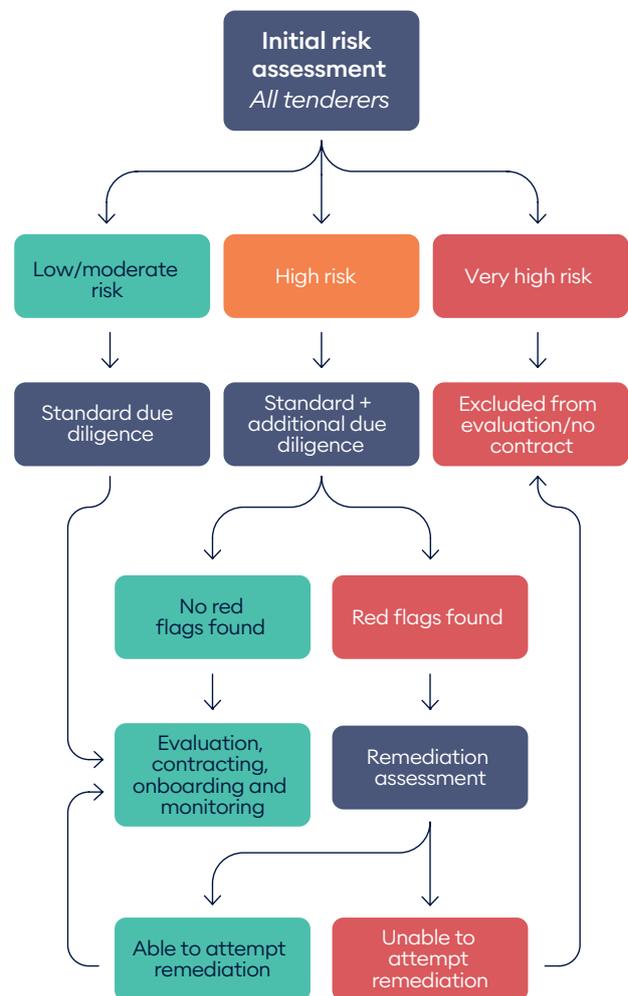
These conditions set clear expectations for supplier conduct, including adherence to relevant laws, our Code of Conduct and responsible labour practices.

Only suppliers that meet minimum accreditation requirements are engaged.

Suppliers are expected to align with Synergy's values and uphold the standards set out in our Modern Slavery Policy and Supplier Code of Conduct, which are embedded into procurement processes and contract terms.

Should suppliers remain unwilling or unable to meet our standards, we reserve the right to terminate the relationship.

Risk assessment of eligible tenders



Due diligence and risk management

We apply a structured due diligence process to assess and manage modern slavery risks throughout our procurement lifecycle.

This process is embedded into tendering activities and scaled according to contract value and risk exposure.

Pre-tender risk assessment

Before initiating a tender, Synergy performs a risk assessment based on industry, category, commodity and country risks (see page 17).

Tender requirements by value

Synergy applies a tiered due diligence framework to manage modern slavery risks in its supply chain, guided by the modern slavery risk and the financial value of procurement activities.

Higher risk and higher value contracts trigger more rigorous assessments and enhanced due diligence to assess supplier practices and identify potential red flags.

This includes the addition of human rights risk management plans, enhanced contractual obligations and, where appropriate, third-party reviews or on-site investigations.

Remediation framework

We do not tolerate any form of misconduct at Synergy, including unethical behaviour that may be linked to modern slavery.

Where modern slavery is identified, our first priority is to prevent further harm to individuals.

We then assess our level of leverage to influence positive outcomes through direct engagement or via broader industry or government mechanisms.

We may engage in remediation activities directly with the supplier or through collaboration with third parties.

If remediation is not possible, we escalate the matter internally and take appropriate enforcement action, including potential contract termination.

Our Modern Slavery Risk Management and Remediation Standard requires us to document and review all remediation efforts, ensuring lessons learned are captured to inform future risk management activities.

Suppliers, workers, or other stakeholders can raise concerns directly with their Synergy representative or anonymously through our independent whistleblower service, Stopline, which is available 24 hours a day, seven days a week.

All reports are treated seriously and investigated appropriately, in line with Synergy's commitment to ethical conduct and human rights.

In FY25, no incidents of modern slavery were identified.



Training and capability building

Employees involved in procurement or supplier management are required to complete modern slavery awareness training.

Our training program, 'Tackling Modern Slavery', is mandatory for all senior leaders and procurement roles.

Since its launch in 2024, 119 staff members have completed the training.

These sessions provide an overview of modern slavery, its global prevalence and the complex challenges involved in identifying, addressing and mitigating associated risks.

Participants gain insight into how these practices can manifest across international supply chains, including areas where Synergy may be exposed.

The training also highlights our legal and ethical responsibilities, reinforcing Synergy's commitment to proactively managing modern slavery risks and upholding human rights across our operations and partnerships.



Collaboration and sector engagement

We recognise that the causes and consequences of modern slavery extend beyond the reach of any single organisation.

Synergy collaborates with industry peers, peak bodies and government agencies to align on good practice and contribute to systems-level change.

This year, we facilitated sector-wide discussions through quarterly GTE meetings, supporting a shared understanding of modern slavery risks in the context of the energy transition.

This collaborative approach strengthens Synergy's ability to influence good practice, align with evolving regulatory expectations and contribute to improved outcomes for vulnerable workers across the supply chain.

This includes active participation in working groups focused on ethical sourcing and modern slavery, as well as bilateral engagement with other government trading enterprises and utilities.

Through this collaborative approach, we aim to increase our influence, drive sector consistency, and contribute to broader policy reform that supports improved outcomes for vulnerable workers.

This year, Synergy actively participated in a range of external forums, webinars and roundtables focused on modern slavery, ethical sourcing and human rights.

These included events hosted by legal, academic, government and industry bodies such as Norton Rose Fulbright, Ethixbase 360, Department of Foreign Affairs and Trade, Attorney-General's Department, UWA Law School, Fair Supply, Forrest Research Foundation, Informed 365 and Ecovadis.

We maintained our active participation in the Human Rights Resource and Energy Collaborative (HRREC), a network of Australian energy and resources companies that work together to share insights, build capability, and develop practical tools to identify and address modern slavery risks across supply chains.

Case study

Synergy leads modern slavery workshop through cross-agency collaboration

Ethical and fair supply chains are a key priority under Synergy's Social Value Framework.

Synergy has been at the forefront of developing utility-scale battery energy storage systems in Western Australia.

The successful delivery of three large-scale battery projects within a four-year period represents a major achievement in both deployment scale and execution timeline.

These complex infrastructure projects have deepened our understanding of supply chain risks, including the potential for modern slavery, and strengthened our commitment to responsible procurement.

Building on this experience, Synergy hosted a modern slavery awareness workshop in June 2025, inviting Horizon Power, Water Corporation and Western Power to experience our internal training.

This opportunity reflects our commitment to drive systems change across the sector and foster cultural change through shared learning.

Eager to collaborate with our community on this critical issue, the session provided external stakeholders with insight into Synergy's approach to training and our broader efforts to address modern slavery risks.

Feedback from participants was overwhelmingly positive, with partners praising the workshop's depth and quality, and the thoughtful reflections on social procurement at a governance level.

The workshop aimed to support Synergy and our GTE partners in navigating the complexities of the energy transition in a way that is sustainable, values-driven and aligned with a shared commitment to identifying and addressing the risk of modern slavery in our supply chain.

The initiative reinforces our strategic focus and ongoing journey to becoming a social value informed organisation.



Case study

Strengthening human rights protections in higher-risk supply chains

This year we strengthened our commitment to ethical and responsible procurement by assessing our business and supply chains to identify industries with increased human rights risks.

The assessment resulted in the identification of a contractor operating in a higher-risk sector and proactively collaborating to understand their approach to human rights due diligence.

Together, we co-developed a Human Rights Risk Management Plan (HRRMP) which emphasises Synergy's determination to assess and address modern slavery risks, including supplier screening and assessment processes.

We formally embedded HRRMP into the contract, ensuring accountability and transparency throughout the contract lifecycle.

This collaboration reflects the priority we place on integrating human rights considerations into our supply chain due diligence processes.

It also underscores the strategic importance we place in upholding international human rights standards, including the UN Guiding Principles on Business and Human Rights and the International Labour Organisation's core conventions.

By working collaboratively, we have strengthened our collective ability to identify, assess and mitigate modern slavery risks — reinforcing our commitment to ethical and sustainable business practices.





Measuring effectiveness



FY24 maturity assessment for comparison



FY25 maturity assessment

We track our modern slavery maturity against our Human Rights Control Framework, which is based on a benchmarked analysis of external best practices in relation to assessing and addressing modern slavery risks.

This year, Synergy recorded improvements across four categories: governance, due diligence, capability building and remedy.

- **Stakeholder engagement** moved from *informal* to *defined* due to increased external collaboration, including targeted modern slavery training sessions with GTE partners and active participation in industry forums.

These efforts have helped build shared understanding and strengthen Synergy's external engagement on modern slavery risks.

- **Policy implementation** progressed to *defined* following the rollout of Synergy's modern slavery framework (page 17), which includes a formal policy, working group charter, risk management standards and procedures.

These components now guide consistent action across governance and operations.

1. Ad hoc

Processes at this level are in a state of dynamic change, tending to be driven in an ad hoc and reactive manner, providing an inconsistent response to the same events.

2. Informal

Processes at this level are unlikely to be rigorous, however, processes are informally established and understood, providing some consistency in response to the same events.

3. Defined

Processes at this level are, in some key functions, standard processes that maybe subject to some infrequent degree of improvement over time. This provides mostly consistent practices and outcomes in response to the same events.

4. Managed

Processes at this level have a common and consistent understanding, having been formalised and subject to continuous improvement, providing consistent practices and outcomes in response to the same events. Such processes are typically integrated within wider organisational processes.

5. Optimised

Processes at this level are focused on continuous improvement of the organisational response to the same events through both incremental changes and innovation, and are recognised as a high value add function of the organisation.

Looking ahead

Over the next year, our objectives will focus on strengthening governance frameworks, deepening supplier engagement and improving traceability across supply chains.



Governance	Frameworks and standards	<ul style="list-style-type: none"> Review framework and associated documents
	Stakeholder engagement	<ul style="list-style-type: none"> Collaboration with Industry and Agency partners to drive systemic change
Due diligence	Risk assessment	<ul style="list-style-type: none"> Continue to embed risk monitoring and due diligence for existing and potential suppliers Prioritise early due diligence on higher risk industries including renewable energy Expand human rights risk management plans into contractual obligations
	Prevent and mitigate / Supplier engagement	<ul style="list-style-type: none"> Explore barriers to achieving appropriate sub tier visibility
	Measuring effectiveness	<ul style="list-style-type: none"> Define and standardise approach to assessing our effectiveness and maturity against our human rights control framework
	Reporting	<ul style="list-style-type: none"> Defining and implementing modern slavery risk reporting
Capability building	Learning and development	<ul style="list-style-type: none"> Assess training effectiveness and approach Promoting a culture of ethical sourcing within the business

Appendix: Governance documents

Key governance documents that detail the approach, expectations, and practices to protect human rights in our internal operations and mitigate modern slavery risks in our supply chain.

Operations (People) Governance	Purpose
Code of Conduct	Sets out standards for appropriate ethical and professional behaviour for Synergy staff and contractors.
Supplier Code of Conduct	Outlines Synergy's values and sets our expectations around modern slavery and human rights as well as health, safety and wellbeing.
Speaking Up Standard	Explains the channels for speaking up; how and to whom people can speak up; what happens when people speak up; and the protections given to people who speak up.
Public Interest and Whistle-blower Procedure	Contains processes for raising concerns about actual or suspected misconduct at work under the PID Act or the corporate whistle-blower laws.
Misconduct Reporting Procedure	Outlines the requirements for employees who receive reports about actual or suspected misconduct.
Recruitment and Selection Standard	Defines the minimum mandatory performance requirements for sourcing activities associated with recruitment and selection of employees at Synergy.
Equal Opportunity Standard	Provides guidance to ensure that all employees and potential employees are treated consistently, equitably, and fairly.
Remuneration Standard	Outlines the key reward principles to remunerate employees fairly and equitably.
Health and Safety Governance	Purpose
Health and Safety Policy	Outlines our commitment to the health and safety of our people.
Health and Safety Risk Management Procedure	Describes the process, procedure and tools for planning, undertaking and follow up action for H&S and process safety hazard and risk reviews.
Fatigue Management Procedure	Provides appropriate guidance, knowledge, and tools for the safe management of fatigue.
Contract and Procurement Governance	Purpose
Procurement Standard	Sets out the standards applicable to all employees in the conduct of activities for procurement of materials and services.
Procurement Procedure	This procedure provides guidance and instructions to support the execution of the procurement process by the supply chain team.
Procure-it Contract Framework Procedure	Describes the requirements and steps to request, source, award, manage and complete a contract at Synergy.
Modern Slavery Procurement Due Diligence Framework	Outlines the approach to assessing and evaluating modern slavery risks through the procurement process.





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