



Modern Slavery Statement

2024



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1. Introduction

This is a modern slavery statement for a single reporting entity, made by Elecnor Australia Pty Ltd (ABN 83 168 435 658)

This statement is published as part of Elecnor Australia's obligations under the Modern Slavery Act (Cth) 2018. For the reporting period 1 January 2024 to 31 December 2024 (2024 Calendar Year). This is the second Modern Slavery Statement published by Elecnor Australia (the previous Statement having been published under the former business name of Green Light Contractors), the company having a consolidated revenue of at least \$100million in the reporting period.

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

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



2. Reporting Entities structure, Operations and Supply chains

Entity structure

Elecnor Australia Pty Ltd (ABN 83 168 435 658)is a wholly owned and controlled subsidiary of Elecnor Australia Holdings Pty Ltd (ACN 164 831 930).

Operating Entities

Operating entities covered under this reporting period.

Entity	Registration
Elecnor Australia Pty Ltd	ACN 164 435 658
Elecnor Australia Holdings Pty Ltd	ACN 164 831 930
Timco Transmission Lines Pty Ltd	ACN 167 929 482

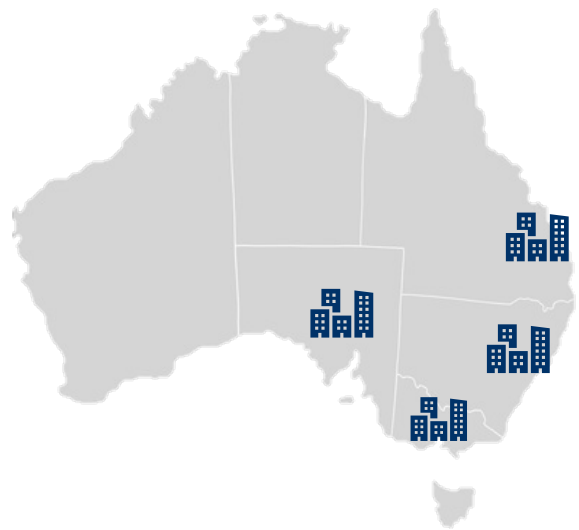
Our operations

Elecnor Australia has projects broadly spread across Australia. Our principal office locations and projects are set out below.

Registered office location – Sydney
Offices in Sydney, Melbourne, Brisbane and Adelaide.

Project sites in Victoria, New South Wales, South Australia, Queensland and New Zealand.

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



For the reporting period, Elecnor Australia employed approximately 1160 people across its operations in Australia.

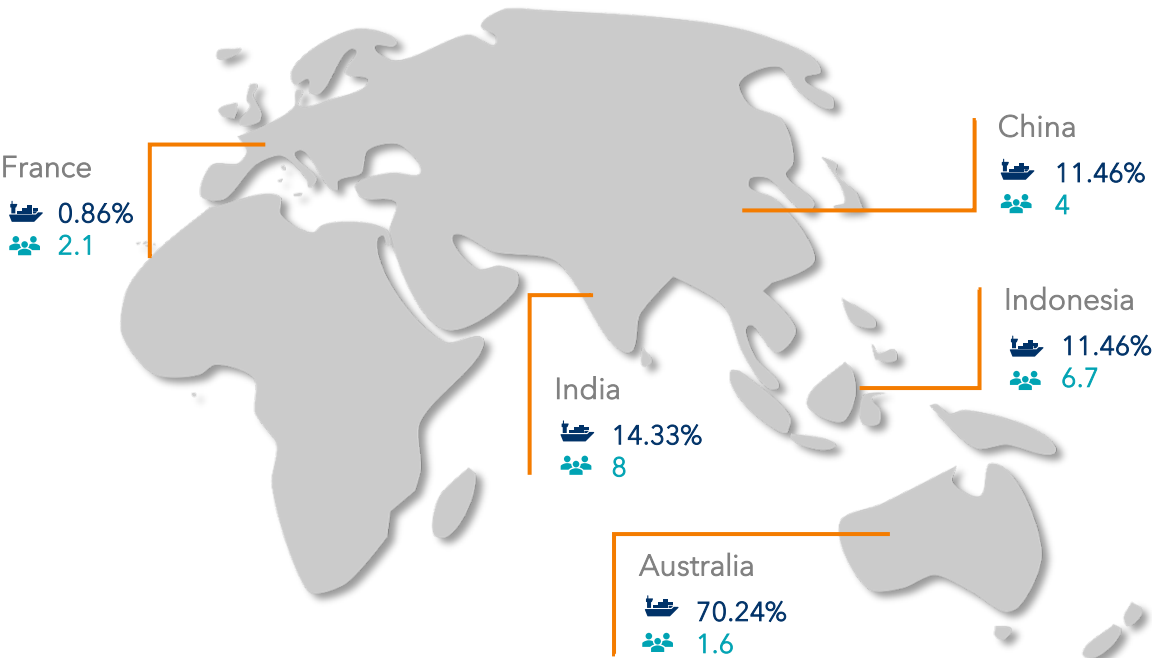
Supply chains

Elecnor Australia's supply chain is spread across the globe. Our network of suppliers provides us with services and goods for our specialised projects across Australia. The following findings reflect data from 2022 to 2024 on a key project and provides an insight into our supply chain during the current reporting period.

Our top spend categories for goods and materials are:

- Tower steel
- Conductor
- Power transformers
- Overhead fittings
- High Voltage equipment (Circuit Breakers, Disconnectors and Instrument Transformers)

Top 5 countries from which Elecnor Australia procured materials and equipment, and its estimated modern slavery



 % of materials and equipment
 Estimated people living in modern slavery per 1000



3. Risks of modern slavery

In the reporting period there were no incidents of actual or potential modern slavery identified in Elecnor Australia's operations or supply chain.

In supply chains

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

Elecnor Australia acknowledges that each country from which it obtains materials and equipment carries with it the potential risk of situation of exploitation falling within the definition of modern slavery. The number of people recorded to be living in modern slavery shown in the previous graphic is based on the Global Slavery Index¹.

The risk of modern slavery in the countries included in the previous graphic varies, but Elecnor Australia acknowledges that the risk in some countries is high. However, given the measures in place that are detailed in this modern slavery statement, we have assessed the risk in our supply chains to be low.

¹<https://www.walkfree.org/global-slavery-index/map/#mode=data:dimension=p>

In our operations

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

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

The Elecnor Australia Human Resources Department regularly reviews the operational procedures and working conditions to ensure adherence to applicable standards and laws. Elecnor Australia will from time to time engage with labour hire agencies in the Australian market.

These agencies are required to operate in compliance with all relevant legislation and laws. This is enforced through Elecnor Australia's agreements with recruitment and labour hire agencies.





4. Actions to assess and address the risks

Elecnor Australia has a framework in place to mitigate the risk of Modern Slavery in its operations and supply chain.

Elecnor Australia Policies and Standards

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

Apart from this code, these policies and standards include:

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

We require all subcontractors and suppliers to comply with the Elecnor Australia's policies in our subcontractor and supplier agreements.

Elecnor Australia encourages disclosures of any potential or suspected unethical, illegal, or unsatisfactory conduct that involves any of the business activities including human rights violations.

We encourage disclosures of misconduct via our Whistleblower policy to ensure concerns can be raised anonymously. Elecnor Australia is committed to engaging in continuous improvement and awareness around Modern Slavery Practices.



5. Assessing the effectiveness of actions

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

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

Additionally, Elecnor Australia is building more effective tools to measure the effectiveness of the mitigation measures used, in addition to continuing to improve detection, escalation, and other mitigation capabilities.

In the reporting period there were no incidents of actual or potential modern slavery identified in Elecnor Australia's operations or supply chain, which we also consider to be an indicator of the effectiveness of our actions.

6. Process of Consultation

We consulted the relevant companies we own or control in the development of this statement.

7. Approval

In accordance with section 13 of the Modern Slavery Act, this statement was approved by the Board of Elecnor Australia Pty Ltd on **30 April 2025**.



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30/04/2025



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