

Modern Slavery Statement

This is a Modern Slavery Statement for Zenviron Pty Ltd ACN 612 344 313 (**Zenviron**) for the reporting period 1 July 2020 – 30 June 2021 (Australian Financial Year).

Zenviron has prepared this Modern Slavery Statement in accordance with section 13 and 16 of the Commonwealth Modern Slavery Act 2018.

About Our Business

Structure

Zenviron is an Australian Wind and Solar Farm engineering, procurement and construction company with approximately 50 employees. Zenviron is structured as an incorporated Company in Australia and has its headquarters in Newcastle, NSW.

Operations

Zenviron's main operations include its Australian construction sites, including the workers it directly employs, workers seconded from our Shareholder Organisations Monadelphous Group Limited and ZEM Energy Pty Ltd, and the specialist workers it subcontracts. Zenviron also provides ancillary planning, engineering and design services for the Renewable Energy sector.

Supply Chains

Zenviron's primary supply chains include the manufacture and transportation of the products it uses in its construction provided by suppliers; such as transformers, electrical cables, road aggregate, and concrete products. In this context, Zenviron's supply chains include the manufacturing facilities where products are made (both within Australia and internationally), the importation and transportation services of those products, and the subsequent sale and distribution of the products to Zenviron.

Zenviron's supply chains also include services provided by suppliers (e.g. cleaning, security, specialist consultants), as well as products and services used by indirect suppliers (such as the mining and refining of minerals and metals used in electrical components purchased by the manufacturers of those items).

Our Policies

Zenviron has a zero tolerance to any form of modern slavery and human trafficking.

Zenviron strictly prohibits human trafficking in all its operations and in those of all subcontractors, suppliers and agents in our global supply chain. Workers are not subject to any form of forced, compulsory, bonded, or indentured labour. All work is voluntary and workers have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.

The workplace is free of any form of harsh or inhumane treatment. Disciplinary procedures do not include sanctions that result in wage deductions, reductions in benefits, or compulsory labour.

All workers, irrespective of their nationality or legal status, are treated fairly and equally.

When subcontracting of recruitment and hiring is necessary, Zenviron ensures that the labour agencies it engages operate legally, are certified or licensed by relevant authorities, do not charge recruitment fees to recruited workers, and do not engage in fraudulent recruitment practices that place workers at risk for human trafficking and sexual exploitation.

Workers are made aware of their rights and responsibilities at the time of hire, including the terms and conditions of their employment contract.

Operations and Supply Chains with a Risk of Modern Slavery

Zenviron recognises there are parts of its supply chain which may be directly linked to modern slavery through goods and services procured.

While Zenviron does not directly cause or contribute to Modern Slavery, Zenviron understands there is always the risk of modern slavery existing to some extent in our supply chains, particularly in distant level of the supply chain where we are removed and have limited influence on the production and management of the goods and services.

Geographic risks:

Zenviron procures goods manufactured in countries reported to have a medium to high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations and NGOs.

Sector and industry risks:

Zenviron procures goods and services from certain sectors and industries that are known to have modern slavery risks because of their characteristics, products, processes and business models. This includes the property and construction sectors, transportation and warehousing, electronics and electrical products manufacturing, and garment manufacturing.

Actions Taken To Address Modern Slavery Risks

Zenviron continues its commitment to ethical business practices and supports a robust a Modern Slavery framework of due diligence and remediation encompassing:

- A commitment to not tolerate any form of modern slavery or human trafficking, through its Anti-Modern Slavery Policy enacted in the 2020-21 reporting year.
- Review of modern slavery risks through existing company Risk Management Processes - which identifies, assesses, mitigates and records risk in accordance with AS/NZS ISO 31000 Risk Management.
- Ongoing review and analysis of operations, supply chain and spend, identifying where exposure to modern slavery may exist.
- Incorporation of modern slavery considerations in procurement activities, through a supplier questionnaire and pre-qualification processes, and the development of remediation plans where required.
- Continuous review and update of Business Management System forms and procedures relating to modern slavery.

- Training and education program integrated into Zenviron's operations, with support from the Supply Chain Sustainability School's tools and resources.
- Supporting our Clients through their own due diligence reviews in relation to modern slavery risks, and acting promptly on any areas of improvement.
- Maintaining a Code of Conduct , which provides our employees with a mechanism to address grievances or potential breaches in a confidential manner, and acts as an early warning system for Modern Slavery risks.

Assessing the effectiveness of actions

Through its onboarding and pre-qualification processes, Zenviron reviews and evaluates the information it receives through self-assessment questionnaires from its suppliers to assess risk and act on any concerns, on an ongoing basis.

In turn, Zenviron's practices are regularly reviewed and scrutinised by our Clients through their own due diligence processes, as well as external certification bodies. We act promptly on any recommendations for improvement identified.

Zenviron also regularly audits its own procurement and supplier registration practices including modern slavery assessments, through an internal audit program, to ensure compliance and address any deficiencies.

Our internal anti-modern slavery policies and procedures are reviewed regularly by senior management, and the participation rate of employee training is also reviewed regularly and reported to Senior Management.

Consultation

Zenviron does not own or control any reporting entities, nor does it jointly prepare statements under section 14 of the Modern Slavery Act.

This Modern Slavery Statement has been approved by Zenviron Board of Directors.

A handwritten signature in blue ink, appearing to read "Perrott".

Nicholas Perrott - Director

November 2021