

Modern Slavery Statement 2024

Cobra Asia Pacific Pty Ltd (ACN 141 813 630)

1 Who we are

This modern slavery statement is prepared by Cobra Asia Pacific Pty Ltd ACN 141 813 630 (**Cobra**) for the 2024 reporting year.

Cobra is an Australian proprietary company based in Sydney, New South Wales, with a registered office located at Suite 1, Level 11, 1 York Street, Sydney, New South Wales 2000. Cobra is wholly owned by parent companies based in Spain, which are ultimately part of the broader Vinci SA group (**VINCI**) based in Paris, France.

Cobra participates in the Acciona Cobra Joint Venture (**ACJV**), an unincorporated joint venture responsible for the design and construction of the REZ Network Infrastructure for the Central West Orana REZ transmission network (**Project**).

During the 2024 reporting year, Cobra employed approximately 71 workers.

2 Our operations

Cobra's only operations in Australia relate to participation in the ACJV which is responsible for the design, construction and project management of the Project.

The Project will build new high-capacity transmission lines, energy hubs and supporting infrastructure to transfer power generated by solar and wind farms to electricity consumers. The new infrastructure is expected to be operational by 2028 and will initially unlock up to 4.5 gigawatts of new network capacity.

The Project consists of 90km of 500kV overhead transmission lines and 150km of 330kV transmission lines for generator connections, stretching from Elong Elong in western NSW through to Barigan Creek in the east, via an energy hub at Merotherie.

3 Our supply chains

Goods and services procured by Cobra through ACJV mainly include construction materials, high voltage and low voltage equipment, transmission towers and ancillaries, and construction plant and equipment. Cobra generally enters into short term supply agreements with each of its suppliers.

The main suppliers used in the provision of the equipment for the Project are based in Australia, China, India, Germany and Spain, and these countries, amongst others, are also the source countries for the goods procured.

4 Modern slavery risks

Cobra considers the risk of modern slavery in its direct Australian operations to be relatively low. Most overseas suppliers engaged in connection with the Project are based in countries that present a relatively low risk of modern slavery, including Spain and Germany.

Cobra appreciates that risks of modern slavery may be present in its supply chain as a result of the geographic location of some suppliers and source materials used in products supplied to Cobra. In particular, Cobra acknowledges that China and India have a higher prevalence

of modern slavery, although neither are considered to present a high risk based on geographical location alone.¹

Cobra also recognises that modern slavery risks may arise deeper in the supply chain where visibility over second-tier and further-tier suppliers is more limited.

The steps Cobra is taking to address these risks are set out below.

5 Our approach to modern slavery

Cobra has a number of measures in place to reduce the risk of modern slavery in its operations and supply chains as outlined below.

5.1 Our operations

Cobra is confident that it has no modern slavery practices within its own operations. We have a number of mechanisms in place with the aim of ensuring a safe, respectful workplace where employees receive pay and entitlements at least in accordance with the minimum standards required by law.

Cobra has a dedicated human resources team managing all human resources related issues and has sought professional external legal advice on minimum entitlements for all employees working in its Australian operations.

The Grupo Cobra corporate group has whistleblower policy procedures in place which enable and encourage eligible whistleblowers (as defined in the *Corporations Act 2001* (Cth)) to report suspected or actual reportable misconduct (which may include human rights breaches or other illegal activity indicative of modern slavery).

These measures are intended to support compliance with Australian workplace laws and to promote lawful and fair working conditions for workers engaged in Cobra's operations.

5.2 Policies

Our parent company VINCI has taken a number of steps to create awareness around modern slavery and human rights issues and address human rights risks in its global operations and supply chain. VINCI implements measures to ensure these steps are implemented in each of its business units, including Cobra. Some of these actions are summarised below but for further detail about VINCI's action to achieve respect for human rights can be found here: <https://www.vinci.com/en/actions-and-missions/our-actions/respect-for-human-rights>

VINCI has global policies in place which address human rights and modern slavery, including a manifesto setting out its overarching global commitment regarding the company's conduct in relation to matters such as compliance with ethical principles, accelerating the environmental transition, striving for zero accidents and fostering equality and diversity. VINCI adheres to the following documents as part of its Corporate Compliance Programme:

- (a) Code of Ethics and Conduct;
- (b) Anti-Corruption Code of Conduct;
- (c) Human Rights Guide;
- (d) Declaration on Fundamental and Essential Actions on Safety and Health at Work; and
- (e) Environmental Guidelines.

¹ China: <https://www.walkfree.org/global-slavery-index/map/#mode=map:country=CHN:region=1:map=prevalence:year=2023:view=resources>
 India: <https://www.walkfree.org/global-slavery-index/map/#mode=map:country=IND:region=1:map=prevalence:year=2023:view=recommendations>

Further information regarding Grupo Cobra's (the Spanish based group of companies that own Cobra) compliance programme is available at:

<https://www.grupocobra.com/en/corporate-compliance-programme/>.

5.3 Awareness and training

VINCI also offers online human rights awareness training globally to all employees as part of its Corporate Compliance Programme. The training covers a range of human rights issues and is designed to raise awareness while equipping employees with practical guidance on identifying, managing and responding to human rights risks.

5.4 Supplier contracting and procurement controls

As Cobra's entire operational capacity in Australia is in the ACJV and Project, the measures implemented by the ACJV in contracting and procurement are directly relevant to Cobra.

All ACJV procurement contracts for the Project contain contractual requirements prohibiting modern slavery. These obligations are passed down from the principal head contract.

In ACJV subcontracts suppliers are required to warrant that neither the supplier nor its directors, officers or personnel have been convicted of any offence involving modern slavery, or been the subject of any investigation, inquiry or enforcement proceedings by a governmental body in connection with modern slavery.

Suppliers are also required to take reasonable steps to ensure that modern slavery is not occurring in their supply chains and to comply with applicable modern slavery laws. Subcontracts used for the Project contain notification requirements and broad rights of audit in relation to modern slavery compliance.

The ACJV also has a procurement policy in place for the Project requiring assessment of potential suppliers on compliance issues, including modern slavery, as part of the tender process prior to supplier selection. This includes the conducting of tender interviews with potential suppliers, undertaking risk assessments based on supplier documentation during the comparative evaluation processes, and carrying out reference checks.

Furthermore, the ACJV operates within the management system of Acciona Construction Australia Pty Ltd ACN 618 030 872 (**Acciona**). As such, the ACJV, and by virtue of this Cobra's Australian operations, operate in accordance with Acciona's modern slavery processes.

As part of the ACJV's procurement process, suppliers are screened through Acciona's systems for their associated risk profile, with significant weighting given to supplier country risk, in accordance with the *Acciona Corporate Procedure: Supplier Qualification & Evaluation (Supplier Evaluation)*. Suppliers with larger commitments or contracts, and suppliers from countries considered 'higher risk', may be required to provide additional information through questionnaires and may be audited by independent third parties such as Bureau Veritas. Acciona's audit protocol form part of its Supplier Evaluation and includes specific human rights considerations.

5.5 Remediation

If Cobra identifies that it has caused or contributed to harm, it will provide for or co-operate in remediation, prioritising the interests of affected people. Where Cobra is directly linked to harm through a supplier, it will where possible use its leverage to seek remediation by the responsible party.

6 Review of control measures

Internal audits are carried out within the VINCI group to assess the effectiveness of its human rights and sustainability management systems. These audits verify the existence and implementation of policies, guidelines and tools such as e-learning programmes, risk mapping and the whistleblower system.

The audits also evaluate the integration of human rights principles within the supply chain, including subcontractor compliance with human rights clauses and supplier audits, and review actions and outcomes relating to inclusion, diversity, employment and human dignity.

These audits are structured around five key areas:

- recruitment practices;
- working conditions;
- living conditions;
- value chain; and
- community engagement.

Cobra uses these audit and review processes to assess the effectiveness of the measures it has in place to address modern slavery risks.

Cobra is committed to continuously assessing and addressing modern slavery risks in its operations and supply chain. This includes conducting a yearly review of our modern slavery risk management system to determine its effectiveness.

7 Consultation

Cobra does not own or control any other entities and therefore did not need to consult with other entities in the preparation of this statement.

8 Other information

Cobra contributes to humanitarian and social initiatives through local community engagement, education and training programmes, and partnerships with social organisations. While these programs do not directly address risks relating to modern slavery, these initiatives are intended to promote social inclusion, employability and improved living standards, particularly in areas where Cobra operates.

9 Approval and mandatory criteria

This statement was approved by two ASIC directors of Cobra Asia Pacific Pty Ltd on 3 July 2026 and is signed by an ASIC director authorised to sign this statement for the purposes of the *Modern Slavery Act 2018* (Cth).

Signed: 
 Name: 2927C4DF850241B... Maximino Fernandez

By typing my name I hereby indicate my intention to sign this document.

Title: Director

Date: 10/7/2026

Mandatory Criteria	Page number
Identify the reporting entity	Page 1 (Part 1)
Describe the reporting entity's structure, operations and supply chains.	Page 1 (Parts 1-3)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 1-2 (Part 4)
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 2-3 (Part 5)
Describe how the reporting entity assesses the effectiveness of these actions.	Page 4 (Part 6)
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	N/A (see Page 4, Part 7)
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 4 (Part 8)