



ACN 154 051 617

Woolnorth Renewables Statement on Modern Slavery 2024





1. Introduction

The Commonwealth *Modern Slavery Act (2018)* (the Act) establishes Australia's national Modern Slavery Reporting Requirement. Pursuant to Section 14 of the Act, Woolnorth Renewables (WNR) is required to submit a Modern Slavery Statement (Statement). This is the Statement produced by WNR.

Conducting our business in an ethical manner is important to WNR and shareholders. We are committed to identifying the risk or instances of modern slavery that may exist as result of our operations and within our supply chains.

This statement has been prepared for the period 1 January 2024 to 31 December 2024 and includes a summary of the actions and activities taken to identify and address the immediate and future risks of modern slavery in our operations and supply chains.

2. Woolnorth Renewables – entity, structure, operations and supply chain (Criteria 1&2)

Woolnorth Wind Farm Holdings Pty Ltd, trading as Woolnorth Renewables (WNR), is a joint venture between Shenhua Clean Energy Holdings (75%) and HT Wind Operations Pty Ltd (25%).

Woolnorth Renewables owns four subsidiary companies:

- Bluff Point Wind Farm Pty Ltd
- Studland Bay Pty Ltd
- Musselroe Wind Farm Pty Ltd
- Mount Fyans Wind Farm Pty Ltd

WNR employs approximately 35 full-time staff and a range of local contractors to support the operation of the wind farms. The Company's functional head office is in Launceston, Tasmania with the wind farms site in both Tasmania's north-east and north-west.



2.1 Operations

WNR owns and operates three wind farms and two transmission line assets in Tasmania (see Table 1 and Figure 1 below).

Table 1 – Wind farms owned and operated by WNR.

| Site | Location | Number/m odel Turbines | Generation Capacity *MW# | Transmission line |
|---|-----------------|------------------------------|-----------------------------|----------------------|
| Musselroe Wind Farm and transmission line | N.E Tasmania | 56 Vestas V90 | 168 MW | 156 poles, 49km |
| Studland Bay Wind Farm and transmission line (spur) | N.W Tasmania | 25 Vestas V90 | 75 MW | 18 poles, 5km |
| Bluff Point Wind Farm and Transmission line | N.W Tasmania | 36 Vestas V66 | 63 MW | 140 poles, 50km |

#MW = megawatts



Figure 1 – WNR asset locations.

Woolnorth Renewables is also developing:



- a wind farm project (Mt Fyans Wind Farm) in Victoria which has not yet received relevant planning and regulatory approvals.
- A grid scale battery project near Derby in NE Tasmania, which has received development approval but has not progressed significantly.

2.2 Supply Chains

The supply chains of WNR are predominately associated with the procurement of spare parts and consumables for maintenance and repair of our wind turbine generators (WTGs) and transmission line assets. Specialist, technical and skilled workers are also engaged to support operations.

Procurement of spare parts and consumables

Most consumable materials and spare parts for WTGs are procured through Vestas in Australia, as the Original Equipment Manufacturer (OEM) of WNR's turbine fleet. Vestas have a presence in Australia with a local headquarters in Melbourne. The main company Headquarters is in Europe (Denmark). Products supplied by Vestas to WNR include spare parts and hardware and consumable products such as grease, oils and filters. The Vestas supply chain is of a global scale as outlined in their latest equivalent Statement ([found here](#)).

Equipment and goods are also procured from a range of other suppliers as a part of our operations and maintenance program (including balance of plant). WNR's supply chain analysis concludes that these other suppliers are largely Australian based, with potential for third party global supply.

Labour

As outline above, WNR has around 35 permanent staff to support the Company's operations. WNR also engages a range of technical, professional, and skilled labour services on either short term, task-based and long-term contracts.

All WNR workers are engaged in accordance with applicable domestic Australian labour laws. Contract labour is sourced from reputable local Australian based companies. These workers are engaged through contracts established under Australian law.

3. Description of the Risk of Modern Slavery in WNR Operations and Supply Chains (Criterion 3)

WNR conducts an annual supply chain appraisal (focussing on suppliers/vendors with expenditure >\$10,000 AUD) to determine what risks of modern slavery possibly exist in its supply chains. The annual appraisal assesses all parts and material supply, and the provision of labour and consulting services. The appraisal also looks at the origin of the parts/materials or labour/consulting service and whether the organisation (or relevant Contract) has management steps in place to manage and monitor modern slavery risks. The annual appraisal is documented.

In summary, the findings of the 2023 appraisal conclude:



- 40% of WNR's annual expenditure is with Vestas. Vestas have a comprehensive management framework to manage the risks of modern slavery in their supply chains and business.
- 75% of WNR's annual expenditure is with 8 organisations that are suppliers of parts, materials, labour and consulting services.
 - Of these 8 organisations, 5 have evidence of modern slavery risk management and published Modern Slavery Statements.
 - In most cases, contractual arrangements between WNR and supply entities have requirements regarding modern slavery.
 - 7 out of 8 organisations are Australian based (or have an Australian office) and therefore are required to comply with Australian laws including modern slavery and other relevant laws (e.g. labour laws).
- There are low risks of modern slavery in Woolnorth's direct supply chain.
- There are possible risks of modern slavery in third party aspects of the supply chain, and these are beyond the extent/reach of WNR's contractual obligations.
- WNR's supply chain analysis reveals two specific areas highlighted for Australia (import risk) in the Global Slavery Index Report (2023). These are textiles and electronics (laptops, mobile phones). WNR's annual expenditure on these areas is typically small and we have specifically evaluated our suppliers/brands for commitments in the area of modern slavery.

4. Actions to Assess and Address Modern Slavery Risk (Criterion 4)

WNR is committed to working towards identifying and mitigating the risks of modern slavery occurring within its business and direct/indirect supply chains. The approach and strategy are to establish effective and practical modern slavery risk controls.

Actions progressed in the 2024 reporting period include:

- Participating in the Modern Slavery Working Group established by the Clean Energy Council for collaboration and knowledge sharing within the renewables sector.
- Annual supply chain appraisal.
- Reviewed Purchase Order and Contract terms and conditions to ensure Modern Slavery provisions are included in standard contract terms.

WNR will progress the following actions in the next 12 months:

- Annual supply chain appraisal, including monitoring of suppliers and service providers in our supply chain for modern slavery risks and management.



- Continue to review our clothing suppliers and the procurement and supply of electronic devices (due to higher risk nature).
- Continue to be part of the Clean Energy Council Modern Slavery Working Group, and any other relevant forums.
- Continue to update and implement a Modern Slavery Plan, that is proportionate to WNR's low modern slavery risk profile, to ensure actions and key performance measures are assessed, tracked and reported on.

5. Effectiveness of our Actions (Criterion 5)

WNR has conducted a range of activities to identify the risks of modern slavery occurring within its business, and direct and indirect supply chains. A sound base has been established to allow WNR's modern slavery management to continue to be developed and refined.

A Modern Slavery Plan remains in place and is used to document activities and actions to address modern slavery, monitor key performance indicators established and report on progress. The Plan is reviewed annually and adjusted to ensure WNR's approach is effective and continues to mature.

6. Consultation with Entities under Ownership or Control (Criterion 6)

WNR does not own or control any other entities and therefore this criterion is not applicable.

7. Any other relevant information (Criterion 7)

WNR does not have any further information to include.

8. Recognition and Approval

This Statement has been recognised, reviewed, and approved by the Board of Woolnorth Renewables.

Signed by:

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Name: Danny Moore
Position: Director
Board of Woolnorth Renewables
2025-Jun-19