



MODERN SLAVERY STATEMENT For year ended 31 March 2021

TILT RENEWABLES LIMITED

This statement has been prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**). The statement sets out the actions taken by Tilt Renewables Limited and its related entities (TRL)¹ to address the modern slavery risks and efforts taken to maintain responsible and transparent supply chains.

TRL structure

For the financial year ending 31 March 2021 TRL was a New Zealand public company, limited by shares and listed on the New Zealand Stock Exchange (NZX) and Australian Stock Exchange (ASX). TRL was incorporated in New Zealand with its corporate office in Melbourne, Victoria.

TRL owned various subsidiary companies including:

- Blayney and Crookwell Wind Farm Pty Ltd
- Dundonnell Wind Farm Pty Ltd
- Dysart 1 Pty Ltd
- Fiery Creek Wind Farm Holdings Pty Ltd
- Fiery Creek Wind Farm Pty Ltd
- Liverpool Range Wind Farm Pty Ltd
- Liverpool Range Holdings Pty Ltd
- Morwell Energy Hub Pty Ltd
- Nebo 1 Pty Ltd
- Rye Park Holdings Pty Ltd
- Rye Park Renewable Energy Pty Ltd
- Salt Creek Wind Farm Pty Ltd
- Snowtown North Holdings Pty Ltd
- Snowtown North Solar Pty Ltd
- Snowtown Wind Farm Pty Ltd
- Tararua Wind Power Limited
- Tilt Renewables Australia Pty Ltd
- Tilt Renewables Insurance Limited
- Tilt Renewables Investments Pty Ltd
- Tilt Renewables Market Services Pty Ltd
- Tilt Renewables Retail Pty Ltd
- Waddi Wind Farm Pty Ltd
- Waverley Wind Farm (NZ) Holding Limited
- Waverley Wind Farm Limited

On 3 August 2021, TRL was acquired by Powering Australian Renewables (PowAR) under a Scheme Implementation Agreement, which also saw the New Zealand assets sold to Mercury NZ Limited. As such, TRL is now governed by the PowAR Board (with the Chair being the signatory for this statement). TRL continues to own and operate its Australian assets as outlined in this statement, with the same risk profile.

TRL operations

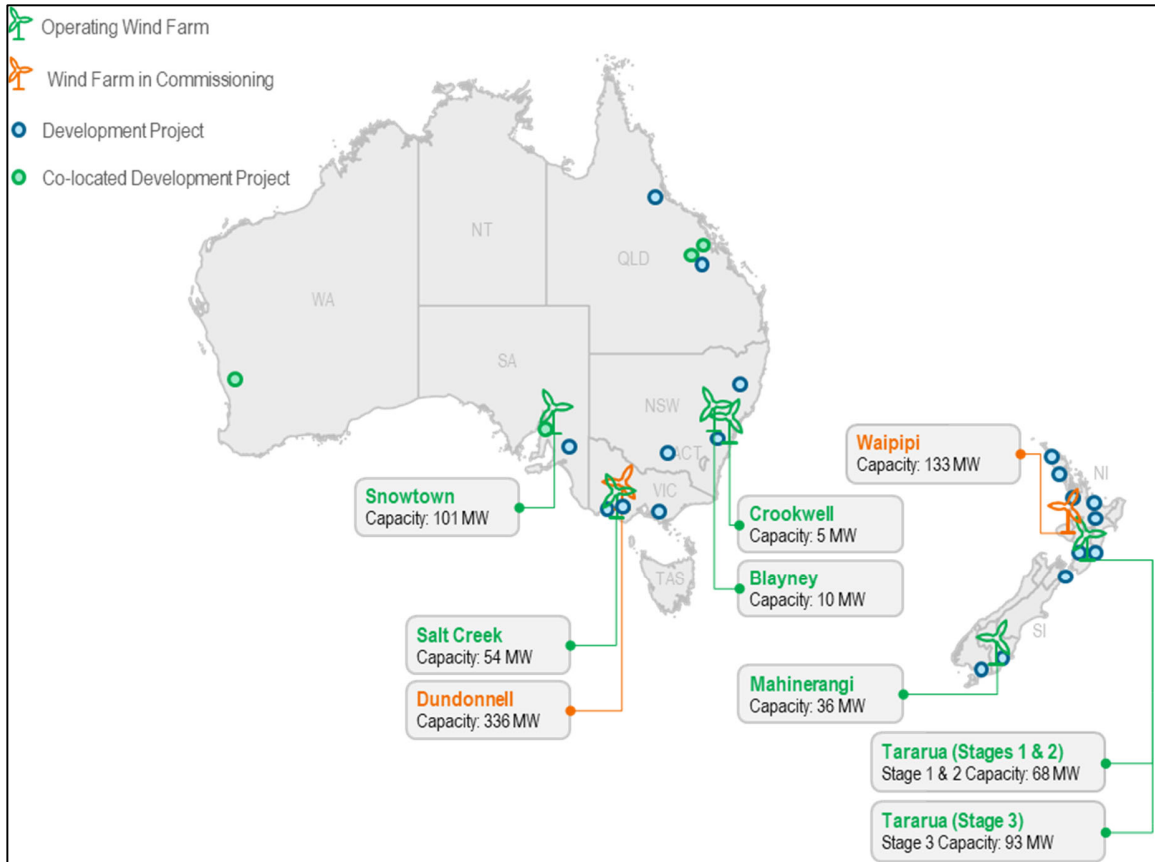
TRL's main business activities include developing, constructing and operating renewable energy generation across Australia and New Zealand (

Figure 1 shows the current portfolio of operational sites and development options).

TRL employs 51 employees directly in Australia and New Zealand. TRL employees are predominantly office based but provide site support throughout the life cycle of a project during development through construction and into operations.

Figure 1. Location of operational and development sites

¹ TRL means Tilt Renewables Limited (ARBN 613 749 616) and its subsidiaries.



TRL supply chains

TRL's supply chains include:

- asset management services associated with its operational sites;
- construction contractors associated with its construction sites; and
- consultation services associated with its activities across development to operations.

TRL's direct supply chains are Australian and New Zealand based, however it is recognised that its suppliers also source key parts and labour from a range of countries² including:

- Denmark
- Spain
- China
- Vietnam
- India
- Brazil
- Italy
- Portugal
- Turkey

These supply chains include:

Asset management: locally (Australian and New Zealand) based engineers and technicians performing on-site maintenance work under a contract with the original equipment manufacturer (OEM). The OEM also

² These countries were determined from Vestas and Siemens Modern Slavery Statements and Suzlon's base of origin.

uses local subcontractors where required, supplemented with specialist technical expertise from overseas where required. Equipment is sourced from the range of countries listed above.

Construction: contracts are entered into for the construction of the project which will include the necessary civil and electrical work on site but will also include the supply and installation of the plant and equipment required for the project. It is common that the majority of the plant and equipment is manufactured overseas and then shipped to the project in Australia or New Zealand. Throughout the on-site works there is typically a significant number of personnel on-site, across a range of subcontractors to undertake the necessary works. Depending on the availability of specialists within Australian or New Zealand, where necessary specialists will be sourced from overseas. These technical skills could include (but not limited to) technical engineering and commissioning expertise used for testing and commissioning works. Where workers are not residents of the local area, they are accommodated in a range of accommodation ranging from long term residential rentals properties to overnight accommodation in local hotels.

Development: locally based engineering and environmental planning consultants are engaged directly by TRL performing office based and on-site survey and design work. Where overnight travel is required, they are accommodated in local hotels.

Support services: TRL's staff conduct a range of office based corporate functions including health and safety, finance, contract, and project management functions. TRL also engages local legal, financial, environmental and engineering consultants to support its activities both at a corporate level and at a project level throughout the life cycle of the project. The corporate clothing and personal protective equipment provided to our staff is sourced from ethically sustainable suppliers wherever possible.

TRL's supply chains also include services ancillary to its operations, such as the cleaning and security company that services TRL's office in Melbourne.

TRL Policies and Governance

TRL has a comprehensive framework in place that is designed to incorporate TRL's values and commitments. Under its Modern Slavery Policy, all employees, including its directors, agents, contractors and any other parties that represent the business, must adhere to and support TRL's commitment to human rights and eliminating modern slavery practices within our supply chain.

In addition to its Modern Slavery Policy, TRL has implemented the following:

Policies

- Risk Management Policy
- Health and Safety Policy
- Code of Conduct
- Code of Ethics
- Whistleblower Policy
- Risk Management Policy

Governance

TRL's Audit and Risk Committee provide oversight of its adherence to the Modern Slavery Policy and the activities associated with this Statement. The Board holds ultimate responsibility for ensuring human rights are preserved and modern slavery practices are eliminated in supply chains.

The TRL group of entities consists of wholly owned subsidiaries established by TRL for a range of different purposes and functions. All the employees are engaged by TRL's subsidiary TRAPL and all other entities have a purely structural or financial purpose. For this reason, consultation was conducted with the employees who are engaged by TRAPL because these employees cover all functions across all subsidiaries. The TRL group of entities delegate their governance function to TRL including their modern slavery compliance obligations.

Programs

TRL has conducted a risk assessment its supply chains. This consultation and assessment included the following activities to address modern slavery:

- Developed and externally published our commitment to addressing modern slavery through a Modern Slavery Policy.
- Prequalification and screening of suppliers and embedded clauses requiring adherence to Modern Slavery legislation in new contracts.
- Ranked the risk levels of suppliers.
- Conducted a modern slavery assessment of OEMs through consultation with their key Modern Slavery subject matter experts and via a checklist provided to OEMs for their completion.
- Provided a guidance document to smaller suppliers identifying the risks to modern slavery, highlighting TRL's expectations for management and commitment to supporting suppliers in eliminating modern slavery practices in their supply chains.
- Provided training to all leadership staff across TRL and its subsidiaries, who may be involved in engaging and managing suppliers and customers, including those who visit suppliers manufacturing plants.

Risks Assessments

TRL has a continuous, sustained effort towards its obligations under the Modern Slavery Act and its Modern Slavery Policy. This includes the identification and mitigation of risks associated with the legislation.

Sector and industry risks

TRL operates almost solely in the renewable energy sector and through assessment of its supply chain, has identified the following areas that may pose risks:

- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour)
- Health and safety (for workers that TRL do not control or who are otherwise engaged in operations outside of TRL's control)

In response to these areas, TRL is committed to its Modern Slavery and Health and Safety Policies in identifying and managing any potential risks. These include:

- Clear contractual requirements for suppliers to meet legislative requirements including Australian and New Zealand labour and health and safety practices.
- Increased engagement with suppliers with risks of modern slavery in their supply chains to understand their practices and provide support to address any modern slavery practices if discovered.
- Participation in the Clean Energy Council Modern Slavery Working Group where members are collaborating in effort to identify and address modern slavery in the renewable energy sector.
- Training for staff has increased awareness of potential risks in the industry and provided guidance on how TRL will address any issues raised (including support for protected reporting if required).
- Changing corporate clothing and personal protective equipment suppliers to ethically sustainable providers wherever possible.

TRL continues to work with OEMs and the Clean Energy Council to understand and address any industry risks identified.

Product and services risk

As a producer of electricity TRL has assessed its exposure to by-product or service risks to be very low. However, TRL has looked further into other products and suppliers used, including corporate travel

providers who have publicly shared their modern slavery policies and/or statements, showing their shared commitment.

TRL has also provided its guidance document to the cleaning and security service provider for its Melbourne office, identifying the risks to modern slavery, highlighting TRL's expectations for management and commitment to supporting suppliers in eliminating modern slavery practices in their supply chains.

Geographic risks

TRL's core business of supplying renewable energy products to its customers is coupled with geographic risks. Whilst slavery activity (human trafficking, sexploitation, forced labour and forced marriage) has been identified as occurring in Australia and New Zealand, these have been assessed as very low likelihood across the activities and sector of construction and operation that TRL operates.

TRL works collaboratively with suppliers operating in additional geographies to monitor slavery activity and then mitigation steps when identified.

Other identified modern slavery risk areas

TRL acknowledges its supply chains are far-reaching. As such, there are a number of areas of its supply chain that TRL does not have visibility over, which may involve modern slavery risks. Areas identified by the Walk Free Foundation Global Slavery Index 2018 include:

- Information technology equipment
- Mining of metals that support the equipment supply chains

It is understood that these risks are several layers of supply chain removed from TRL control and that TRL has minimal ability to influence practices. However, TRL seeks to understand these risks and will continue to work with the Clean Energy Council's Modern Slavery Working Group to engage the relevant government bodies and industry groups to address any issues that might arise.

Effectiveness of TRL's actions (measurements for Modern Slavery obligations)

In the year since TRL has implemented its Modern Slavery Policy, TRL has successfully identified, assessed and addressed its risks to modern slavery throughout its supply chains.

Through providing modern slavery training to its employees responsible for engaging and managing supply chains, these staff are able to monitor, identify and address any ongoing modern slavery practices that may be discovered.

TRL will continue to support and actively participate in the Clean Energy Council Modern Slavery Working Group. TRL also continues to review the following reports to understand its risks:

- the Annual Trafficking Persons Reports to ascertain the geographical risks in which TRL's supply chains operate;
- the US Department of Labour List of Goods Produced by Child or Forced Labour to identify any goods used by TRL that may pose a high risk of modern slavery; and
- the Fair Work Ombudsman website to ensure contract arrangements are managed and monitored in accordance with Australian employment law.

TRL will also seek to work alongside other relevant non-government organisations to ensure that it remains aware of modern slavery risks in its supply chain, and to avoid inadvertent engagement with modern slavery practices.

This statement was approved by the Board of Tilt Renewables (including its subsidiaries) on 13 September 2021.



Cheryl Bart

Chair

September 2021