

Modern Slavery Statement – 2023

In accordance with Australia’s Modern Slavery Act 2018, this statement outlines the steps that TagEnergy has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

TagEnergy recognises that it has a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.

TagEnergy is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain. We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

1. Confirmation of Reporting Entity

This Modern Slavery Statement is made jointly by TagEnergy Australia Pty Ltd (ACN 655 814 958) (“**TEA**”) and its related bodies corporate TagEnergy Australia Investments Pty Ltd (ACN 663 092 911) (“**TEAI**”) and TagEnergy Australia Investments 2 Pty Ltd (ACN 667 156 014) (“**TEAI2**”). For this statement, these entities shall be referred to as TagEnergy Australia collectively.

This is the second statement to be made by TagEnergy Australia in compliance with the Modern Slavery Act 2018 (Cth) (the “**Act**”). Whilst TagEnergy Australia will not receive the minimum A\$100m annual revenue to trigger mandatory reporting until 2024/2025, the supply chain activities undertaken in 2023 onward contain overseas supplies that could involve modern slavery risks. Considering these risks, TagEnergy Australia is publishing this initial statement and will conduct annual statements under the voluntary scheme until the mandatory criteria is established.

2. Entity Structure

TEA, TEAI and TEAI2 are 100% owned by TagEnergy, S.A., with Portuguese company number 515272949 (“**TagEnergy**”).

TagEnergy undertakes the development, finance, construction and operation of utility-scale renewable energy generation and storage projects. TagEnergy is based in Lisbon, Portugal with business activities in Portugal, Spain, France, UK and Australia. TagEnergy comprises 40 persons globally.

TEA is an operating company that undertakes TagEnergy’s Australian development and operational activities. TEA provides professional services to assets owned by TEAI and TEAI2. TEA has 12 employees.

TEAI and TEAI2 are asset holding companies that hold TagEnergy’s Australian renewable generation and storage asset investments. These holding companies do not have employees, and contracts its requirements to TEA and other service providers. Please refer to the structure chart at the end of this statement.

3. Operations

TEA undertakes the identification, development, approvals, procurement planning, arranging finance, construction management, sales and administration of electricity and green benefit products and management of operational assets for renewable energy and storage projects throughout Australia.

Once ready for construction, the development projects are transferred to the ownership of special-purpose project companies established to allow efficient project lender securitisation over the asset. These companies are owned by TEAI or TEA2 (alone or with 3rd party co-investors in certain cases).

During construction and operation, TEA provides professional management services to the project companies over the typical 30 year life of the asset.

Project assets (themselves held in Australian special purpose vehicles) that are anticipated to be held by TEAI or TEAI2 range in value from A\$100m to A\$2B. Revenue earned from the sales of electricity and green benefit products will likely exceed A\$100m per year starting from 2025.

During the first reporting period (2022), TagEnergy Australia undertook only one (1) procurement activity (EPC construction of a wind farm) that could conceivably contain slavery risks. As part of this procurement, in addition to utilising contractual obligations, TagEnergy Australia sought and received specific anti-modern slavery statements of assurance from the contractor (the world's largest wind farm supplier) that were considered to be sufficient and robust.

4. Supply Chain

TEA has a relatively simple and inherently slavery-resistant supply chain, comprising:

- professional advisors such as lawyers, engineers, accountants, ecologists
- professional staff costs
- Australian and international travel
- miscellaneous office, advertising and promotion costs

TEAI and TEAI2 have a more complex, and potentially slavery-exposed, supply chain:

- multi-national renewable energy technology companies, eg suppliers of wind turbines, solar modules, power inverters, transformers, etc and their related sub-supply chain partners.
- Australian civil, electrical, heavy transportation and crane contracting companies
- Australian 3rd party service providers, including professional advisors, managers, control room operators and Australian-based specialist asset maintenance contractors
- Australian and international banks who provide project finance
- Australian developers of renewable energy projects
- Australian landowners who host wind turbines in return for lease payments
- Australian electricity transmission providers who provide access to the grid for export of power

5. Modern Slavery Risks

TagEnergy Australia's Australian supply chain is inherently slavery-resistant due to the typically professional-level positions involved and tier 1 reputable organisations engaged.

TagEnergy Australia's slavery risks arise from its multi-national 'sub-supply chain'. In all projects, TagEnergy Australia (or the relevant project SPV subsidiary) enters into full EPC contracts with a tier 1 Australian entity or the Australian office of a multinational company. Examples include Vestas, Siemens, Tesla, General Electric, etc. These 'head contractors' manage a suite of related-entity and 3rd party sub-suppliers.

The related entity sub-suppliers are typically very well-managed and slavery-resistant due to the strong organisation controls implemented by the multinational owners with strong anti-slavery commitments.

The sub-supply chain of these multi-nationals can include companies producing sub-components in a range of countries, including China, Denmark, Germany, India, Indonesia, Malaysia, Turkey, Thailand United States and Vietnam.

6. Assess and Address Risks

TagEnergy Australia's slavery risks will be controlled and mitigated through:

- i) pre-procurement risk assessment to identify at-risk project components and suppliers
- ii) relevant anti-modern slavery controls added to procurement process
- iii) selection of head contractors meeting anti-modern slavery criteria
- iv) periodic monitoring of contractor performance

TagEnergy Australia's head contractors will be required to clear policies, organisation commitment and adequate resources to implement effective anti-modern slavery programmes.

TagEnergy Australia will require that head contractors must extend their due diligence into sub-suppliers in countries with moderate modern slavery risks with on-the-ground inspections of compliance and risks.

As an example of a pre-procurement risk assessment, we note that a particular risk that is emerging in the renewable energy sector is the (reported) use of forced labour in parts of the solar module supply chain. This risk is being beginning to be addressed by progressive suppliers and customers by purchasing components with a 'guaranteed' origin of the goods to be modern-slavery free. TagEnergy Australia is monitoring the development of this new market and will implement these controls when the provenance requirements can be adequately guaranteed.

7. Governance

TagEnergy Australia is committed to informing our employees and suppliers of modern slavery risks and actions that can be taken to reduce such risks. TagEnergy Australia commits to continuously:

1. Publish our Modern Slavery Statement;
2. Undertake employee online awareness training using the Australian Border Force [website](#)
3. Implement pre-procurement Modern Slavery risk assessment for all projects;
4. Include anti-modern slavery provisions in all procurement documentation;
5. Include anti-modern slavery considerations when inspecting overseas supplier facilities;
6. Undertake annual Board review of the Statement and relevant actions taken during the year;

8. Assessment of Effectiveness of Actions

TagEnergy Australia assesses the effectiveness of its identification, mitigation and governance processes by tracking the adherence to the obligations set out at 6) and 7). The organisation complied with each of the obligations for the 2022-23 reporting period (noting the very limited procurement activities in the period. In 2023-2024, TagEnergy Australia will continue to develop tools to assess its effectiveness and broaden its awareness of the risks of modern slavery in its supply chain. TagEnergy Australia will develop a procurement checklist to be implemented in the 2023-24 period that contains the requirements of the anti-modern slavery statement.

9. Approval of the statement

This statement was approved by the boards of each of the three reporting entities covered by this statement. The boards of TagEnergy Australia Pty Ltd (ACN 655 814 958, TagEnergy Australia Investments Pty Ltd (ACN 663 092 911) and TagEnergy Australia Investments 2 Pty Ltd (ACN 667 156 014) approved this statement on 1 July 2023. The signatures of the directors that approved this statement for the three reporting entities covered by this statement are set out below.

Organisation	Position	Signature	Name
TEA, TEAI and TEAI2	Director		Andrew Riggs
TEA, TEAI and TEAI2	Director		Franck Woitiez
TEA and TEAI	Director		Damien Bonnamy
TEAI	Director		Francois Debailon

