



MORDERN SLAVERY STATEMENT

Dated June 2025

for the year ended 31 December 2024

1) Reporting Entity

This statement (**Statement**) is made on behalf of Equans Solar & Storage Australia Pty Ltd (ABN 39 657 945 170) with registered office at Level 9, 558 Pacific Highway, St Leonards, NSW 2065 (**ESSA**) pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (Act).

ESSA takes its obligations in relation to the identification, prevention and reporting of modern slavery and human trafficking seriously. It is working hard to identify and reduce the risk of modern slavery and human trafficking in its supply chains and in every part of its business. ESSA has a zero-tolerance approach to managing the risk of modern slavery. Its anti-slavery and human trafficking policy reflects its commitment to acting ethically and with integrity in all its business relationships. ESSA adheres to a worldwide group Code of Ethics personally supported by Martin Bouygues, Chairman and CEO of Bouygues SA and pursuant to this, undertakes to comply with the strictest legal and moral standards in the conduct of its operations.

The Statement sets out what ESSA has done in the reporting period, from 1 January 2024 to 31 December 2024, to work towards ensuring that slavery and human trafficking is not taking place in any part of ESSA's business or its supply chains.

2) ESSA's structure, operations and supply chains

ESSA is a private limited company that carries out engineering, procurement, construction and operations of solar energy plants and battery energy storage systems in Australia. ESSA is incorporated in Australia and has its headquarters in St Leonards, Sydney, Australia. ESSA has 46 direct employees and no subsidiaries.

ESSA is a wholly owned subsidiary of Bouygues Energies & Services SAS, which is a subsidiary of Equans France SAS, headquartered in France and is part of a group of companies worldwide which have Bouygues SA, a CAC 40 index company listed on the Paris Euronext, as their ultimate parent (**the Bouygues Group**). The Bouygues Group has over 200,000 employees worldwide and operates in approximately 80 countries.

ESSA's operations in this reporting period have primarily been carried out in a joint venture business relationship with Bouygues Construction Australia Pty Ltd (ACN 144 013 801), a related body corporate of ESSA. The joint venture is registered with ABN 13 968 801 324 and its operations are further described in paragraph 3 below.

ESSA's clients in this reporting period have been private sector clients. As a leading engineering, procurement and construction contractor in the energy field in Australia, ESSA has a complex supply chain model that both supports its core operations and maintains its office and technology infrastructure.

3) Risks of modern slavery practices in the operations and supply chains of ESSA

ESSA considers that it is unlikely that it would directly partake in modern slavery and human trafficking practices but realises that it may inadvertently contribute to them through its subcontracting and supply chains.

ESSA's supply chains relate mainly to the following activities:

- > Subcontracting – the specialist subcontractors necessary to deliver certain construction and engineering operations on ESSA construction sites, including buying and hiring specialist equipment.
- > Labour Hire – the use of labour hire for projects.
- > Consultancy – professional and consultancy services from design professionals in various fields, including, without limitation, engineering (such as structural, civil and mechanical and electrical) geotechnical and tender services.
- > Supply of specialist equipment and materials – the purchasing and transportation of the specialist equipment, products and materials it uses in its projects. In this context, ESSA's supply chains include overseas suppliers in China, India, U.S.A. and Europe where products such as solar panels, trackers, inverters, axial fans, dampers, HV switchgear, tunnel lighting and attenuators are made. These products are then imported into Australia and subsequently distributed to ESSA's sites.
- > Business services – a wide range of products and services necessary to maintain normal day to day operations in its offices and at its sites to support its core business functions such as cleaning, catering and security.
- > Professional services – professional services such as external training, audit services and advisory services in areas such as tax, regulation, insurance and law.
- > Real estate – the leasing of office and residential space to accommodate staff and operate its business.
- > Technology – the systems, software and equipment that are necessary to maintain the technology infrastructure that supports ESSA's core business.
- > Travel – ESSA works with a number of travel and accommodation providers such as hotels and airlines. ESSA's relationship with suppliers are not based on any ongoing engagement commitments and are generally short term and changeable.

In addition to supply relationships, as previously mentioned, ESSA is in a joint venture (**JV**) business relationship with Bouygues Construction Australia Pty Ltd. The JV is the Contractor in relation to the engineering, procurement and construction, operation and maintenance for the following solar energy projects:

- ✓ 440MW Culcairn Solar Farm in Culcairn, NSW; and
- ✓ 250MW Goorambat Solar Farm in Goorambat, Vic.



4) Actions taken by ESSA to assess and address these risks, including policies and due diligence and remediation processes

ESSA works closely with its joint venture partner to implement appropriate modern slavery risk processes and controls in the JV. In relation to the JV's abovementioned projects which were in delivery during the 2024 reporting period, modern slavery measures were in place including the following:

- carrying out compliance searches on every new entity with which ESSA contracts;
- project specific contract clauses addressing modern slavery risks;
- ethics induction training for personnel on the Projects;
- the ability to conduct third party inspections and if necessary, with the assistance of an external auditor; and
- procurement processes including specific checks on suppliers from high risk countries, (including through ESSA's related procurement entity based in China, detailed further in section 4.2 below) and requesting evidence of modern slavery procedures, policies and statements from suppliers.

Risks have been identified in the following areas of ESSA's supply chain:

- > Engaging labour hire companies for execution of ESSA's projects. We are aware that labour hire companies have been highlighted as a high-risk area for potential exploitation of migrant workers. We note that this risk is reduced for ESSA, due to requirements in our standard subcontracts and invitations to tender for subcontractors and suppliers to comply with state-specific labour hire laws, and strict requirements for labour to have the relevant working rights, training and vocational licences.
- > Procuring tools, equipment and specialist machinery from overseas supplier factories for ESSA's operations. Some of these companies are in countries reported by international organisations or NGOs to have a high prevalence of modern slavery e.g. China.
- > Procuring materials. Where possible, ESSA endeavours to procure from Australia but in most cases, due to the specialist nature of the materials required in ESSA's operations, ESSA will procure from overseas suppliers, particularly in China, India and parts of Europe.
- > Procuring staff uniforms and personal protective equipment (PPE) and electronics for employees. We are aware that textiles / clothing and electronics are high-risk sectors.

4.1 Policies in relation to modern slavery and human trafficking

ESSA has a number of policies and procedures which are relevant to preventing instances of modern slavery from occurring in its business and its supply chains, supported by a Compliance Team at ESSA's parent company level in France, to whom breaches of any of the following policies can be notified. Further, ESSA's joint venture partner maintains the same procedures as part of the Bouygues Group, and therefore ESSA also has an Australian-based compliance contact. Relevant policies are provided to the supply chain during the procurement process and are included as part of ESSA's contracts with its supply chain. In particular, the following policies are directly relevant to the subject matter of this Statement:



- **Modern slavery policy** – this policy specifically addresses the subject matter of the Act recognising and preventing trafficked, forced, bonded and child labour.
- **Human Rights Policy** – this new policy, formalised in 2024, consolidates the Bouygues Group’s long-standing commitment to respecting human rights across all our entities and global operations. It sets a common core of principles, guiding the employees’ actions wherever we operate.
- **Code of Ethics** - this policy requires employees, subcontractors and suppliers to comply with the principles of the United Nations Universal Declarations of Human Rights, the fundamental conventions of the International Labour Organisation, in particular, concerning forced child labour and the principles of the United Nations Global Compact.
- **CSR Charter for Suppliers and Subcontractors** – this charter sets out the standards expected by ESSA, as part of the Bouygues Group from its supply chain in several areas, including compliance with labour standards.
- **Equans Corporate Social Responsibility policy** – this policy specifically forbids the use of child labour and slave labour.
- **Whistleblowing Policy** – this policy encourages employees, subcontractors and suppliers to bring any bad practice they become aware of to the attention of an Eligible Recipient under Australian Whistleblowing legislation without fear of repercussions for doing so.
- **Delegations Authority and contract signing procedure for Projects** – this policy sets out ESSA’s internal control procedures with regards to approving financial transactions and signing contracts with suppliers. This procedure ensures that contracts cannot be entered into without an appropriate level of review and authorisation by a suitably senior and qualified member of staff.

These policies are available either on the ESSA’s Sharepoint and internal management system, or are emailed to employees and relevant policies are made available to the supply chain during procurement.

Further to the policies listed above, as a general policy of ESSA, high risk subcontractors and suppliers proposed for a project are screened by the due diligence process set out in section 4.2 below. This allows elimination of subcontractors and suppliers at procurement stage which do not adhere with ESSA’s compliance framework. It also allows a risk profile to be allocated at the start of the business relationship which is reviewed periodically until the end of the relationship.

4.2 Due diligence processes

ESSA and its suppliers are expected to live up to and adhere to the principles set out in the antislavery policy which endeavours to reflect UN Guiding Principles 15 and 17 and demonstrate progress towards the standards set out in it.

Prior to contracting with any new entity, ESSA’s parent company compliance team carries out due diligence to evaluate the entity. All types of third party entities will be evaluated and evaluations are periodically updated.

The nature of the due diligence and evaluation depends on the level of risk that the third party poses. Depending on the level of risk, ESSA will carry out different types of assessment on the third



party for example, we require the third party to complete a questionnaire for a self-assessment; or we will carry out a level 1 ethics assessment (carried out internally) or a level 2 ethics assessment (carried out by an external provider).

Any information contrary to ESSA's policies (ethics, respect for labour standards, health and safety protection or respect for the climate) is noted and a decision will be made as to whether ESSA may pursue a business relationship with that entity.

Further, ESSA makes enquiries with its suppliers about their policies and practices concerning modern slavery and makes enquiries as to a supplier's compliance with ESSA's policies. ESSA makes such enquiries and reviews its suppliers on an annual basis, particularly for those suppliers based in high-risk countries, providing high-risk supplies, or engaged in high-value supply contracts. Where considered appropriate, ESSA requests from its suppliers a copy of their Modern Slavery Statement or other documents detailing their commitment to compliance with the Act. At this stage, ESSA does not make enquiries further down the chain to the sub-suppliers. ESSA's enquiries include periodic visits to factories.

Additionally, due to the large amount of procurement that is carried out of China, for specialist equipment required for solar farms, ESSA utilises its logistics arm in China, also part of the Bouygues Group, in conjunction with an external auditor, to perform factory inspections and enquiries of certain suppliers. The scope of the screening the external provider performs depends on the nature of the goods or services being procured, but can include financial checks, data security assessments, reference checks, obtaining copies of relevant supplier's policies and procedures and on-site inspections including interviews with a supplier's employees.

The JV's standard form Subcontractor Pre-Contract Interview and Invitation to Tender includes questions about adherence with the Act and commitment to addressing modern slavery and human trafficking and requires any labour hire companies that the JV engages to provide their licence pursuant to any applicable Labour Hire Licensing Scheme.

ESSA's site teams hold meetings with their subcontractors, suppliers and consultants during which labour standards, health and safety, payment and performance issues may be discussed. This allows ESSA to continuously monitor the performance of its supply chain and act promptly when their performance falls below the required standards. ESSA meeting with its supply chain is another way in which their performance is assessed and compliance with ESSA's contractual requirements such as the Charter, Modern Slavery and Health and Safety policies is reviewed.

Lastly, suppliers that have framework supply agreements in place with the Equans Group and each of these suppliers are evaluated and certified by EcoVadis with a minimum required rating of 45/100. For its operations in Australia, ESSA encourages its subcontractors and suppliers to become EcoVadis certified.

4.3 Risk assessment, management and remediation

Section 3 above sets out the areas of ESSA's procurement activity where there could be a higher risk of modern slavery or human trafficking taking place. To reduce the risk of indirectly engaging in modern slavery through its supply chain, ESSA has a select list of top tier, evaluated and verified suppliers with which it regularly contracts. Further, ESSA's parent company has a central procurement function for its projects that assesses and manages the procurement of high value and/or high-risk goods and services in accordance with ESSA's procurement practices and formal tendering procedures. This function is critical in strategically assessing the risk of Modern Slavery at the time of negotiating the key areas of procurement for a new project.

Globally, dealings with Russia and Ukraine have been reviewed since the commencement of the conflict and ESSA no longer purchases suppliers from these regions.

ESSA, in conjunction with the JV employs a team of lawyers and has a compliance officer to ensure compliance with its own legal and ethical obligations. ESSA and the JV have in place appropriate processes for reporting concerns within the business, including the whistleblowing procedure.

To ensure that all employees and subcontractors are aware of and can utilise the whistleblowing platform, including for risks related to modern slavery or human trafficking, ESSA launched a poster campaign across all its sites in 2024, featuring a QR code that leads directly to the Bouygues Group whistleblowing platform.

ESSA's standard subcontract suite includes clauses requiring compliance with the Act and any applicable Labour Hire Licensing Scheme, which are included in all of its contracts with suppliers, subcontractors and service providers. These clauses permit ESSA to terminate for non-remediation of a breach of anti-slavery obligations by a supply chain member. ESSA provides its employees with access to an employee assistance programme (provided by an independent third-party company) that can be used by its employees for free and confidential advice in relation to workplace concerns or issues.

As an example of the effectiveness of ESSA's due diligence and remediation processes, in 2023 a supplier (not to ESSA directly but to the group of companies to which ESSA is part) was blacklisted because of potential connections with forced labour in the Xinjiang province of China. As a result of internal audits, and further due diligence ESSA was able to verify that there were no connections between the blacklisted supplier and forced labour resulting in the supplier being removed from the ESSA blacklist in 2024.

4.4 Training in relation to slavery and human trafficking

During the 2024 reporting period, an ethics and compliance training program was implemented, which was mandatory for all ESSA employees. New employees are made aware of Modern Slavery, where the key risk areas are and how they can play a part in assessing Modern Slavery Risk as part of ESSA's ethics induction training.

5) How ESSA assesses the effectiveness of these actions

ESSA recognises that some areas of its operations and supply chain are exposed to parts of the industry that could be considered high risk and is committed to continually improving process to minimise these risks. ESSA believes that its processes and controls in place are effective in

minimising the risks of Modern Slavery in its supply chain and acknowledges that key focus is required prior to engaging with new major suppliers, specifically during the strategic procurement stages of new projects. This is a key focus of the procurement teams when a new project is awarded to ESSA.

6) ESSA's continuous improvement plans

ESSA remains committed to developing its policies and processes to ensure that any occasion of modern slavery or human trafficking is identified and resolved in the best interests of the victim. Any potential concerns about incidents of modern slavery on ESSA sites would be investigated and, where appropriate, reported. ESSA is committed to further developing its due diligence of its supply chain and management of modern slavery risks, working with its supply chain partners to foster best practice.

ESSA intends to continue to evaluate and improve its methods for fighting against modern slavery actions by:

- > continuing to enhance its screening processes, particularly for suppliers from high risk countries;
- > implementing further ethics and compliance training and awareness at all levels of the company, including in relation to modern slavery;
- > gathering feedback from procurement, legal and HR teams to holistically consider trends in any anti-slavery cases reported including through grievance/ whistleblowing/ anti-slavery policy reporting mechanisms;
- > engaging a third party auditor to review the current processes and provide suggestions for improvement;
- > deepening the level of enquiry further into the supply chain to sub-suppliers;
- > enlarging the enquiries to suppliers of all equipment.

7) Conclusion

This Statement has been approved by the board of directors of Equans Solar & Storage Australia Pty Ltd.



.....
Elisabeth Benedetto – Managing Director
Equans Solar & Storage Pty Ltd