

SYMPHONY INFRASTRUCTURE PARTNERS



MODERN SLAVERY STATEMENT 2024-2025

Symphony Infrastructure Partners
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1 MODERN SLAVERY STATEMENT

About This Statement

This Modern Slavery Statement is submitted by Symphony Infrastructure Partners Pty Ltd (ACN: 660 075 258), (**Symphony**) on behalf of itself, and each related entity listed in Appendix A (each, a Symphony Reporting Entity) (**Symphony Group**), for the reporting period of **1 July 2024 to 30 June 2025**.

This is Symphony's inaugural Modern Slavery Statement prepared in accordance with the *Modern Slavery Act 2018 (Cth)*. As a business entering its first mandatory reporting cycle, we recognise that addressing modern slavery is not a one-time compliance task but a process of continuous improvement. This document details our current due diligence efforts and sets out our roadmap to strengthen our visibility and response mechanisms over the coming years.

2 ABOUT SYMPHONY INFRASTRUCTURE PARTNERS

2.1 STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

2.1.1 Reporting Entity and Structure

Symphony is a vertically integrated Australian energy transition infrastructure platform. Symphony is the ultimate holding company for each Symphony Group Reporting Entity. Its operations span engineering, procurement and construction (EPC), grid services, network-services, transmission, civil infrastructure delivery, modular manufacturing, and ongoing asset management. The organisation combines on the ground engineering, construction, civil and technical advisory capabilities to accelerate renewable energy deployment and strengthen Australia's critical energy infrastructure network.

The group operates through two primary pillars:

- **Lighthouse Industries:** An infrastructure services partner comprising specialist operators in engineering, construction, transmission works design, manufacture and supply, operation and maintenance, site works, civil and foundation construction and met mast manufacturing and installation. Lighthouse Industries provides transmission and network-infrastructure including, high voltage substations, transportable switchrooms, overhead power lines, transmission tower/monopole erection, conductor stringing, and full testing & commissioning services for resources and large-load clients.
- **Solas Infrastructure:** A specialist electricity network connection business providing feasibility, design, commissioning and long term operations for grid connection and network facilitation services for a tailored end-to-end solution for renewable energy

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generators, energy-storage providers, digital infrastructure owners, and large energy consumers.

2.1.2 Operations

Symphony Group's operations are focused on the delivery of critical energy infrastructure. Our core activities involve:

- **Engineering, Procurement, and Construction (EPC) and Balance of Plant (BOP):** Delivery of turnkey solutions for utilities and renewable developers.
- **Grid Services:** Technical advisory, grid connection works, and high-voltage testing.
- **Asset Management:** Building, Ownership and Operation of critical energy network infrastructure.

2.1.3 Supply Chains of Symphony Group

Symphony Group's supply chain is unique due to the geographic nature of our work. Our projects are frequently located in regional and remote Australia.

Our Commitment to Local Participation: Where possible we engage local contractors and suppliers as part of our investment into the communities where we operate. We believe that critical infrastructure projects should leave a positive economic legacy in the regions within which we operate.

Consequently, our supply chain is heavily weighted towards:

- **Small-to-Medium Enterprises (SME's):** Local civil contractors, specialists, and trade services.
- **Regional Family Businesses:** Local accommodation providers, equipment hire, and logistics support.

We acknowledge that this geographical footprint presents specific modern slavery compliance challenges. Small regional businesses often lack the resources for sophisticated compliance teams or formalised policies (such as Modern Slavery Statements). However, we view this as a manageable risk that is outweighed by the social benefit of local economic participation.

Our supply chain is segmented into three primary categories:

1. **Infrastructure & Construction Materials:** Procurement of steel, concrete, cabling, transmission towers, and raw materials.

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2. **Specialised Energy Equipment:** High-value components such as transformers, switchgear, solar PV modules, and battery storage systems. These supply chains are often global, extending to manufacturing hubs in Asia and Europe.
3. **Corporate & Professional Services:** IT hardware, office consumables, and professional advisory services.

Our direct supplier network comprises **347 Tier-1 suppliers**.

3 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

3.1 RISK ASSESSMENT METHODOLOGY

We evaluated **263 of our 347 Tier-1 suppliers** (approx. 76% coverage) against comprehensive ESG metrics (including Human Rights and Modern Slavery). This data driven approach allowed us to distinguish between suppliers with robust governance and those requiring greater support.

3.2 IDENTIFIED RISK PROFILE

The assessment categorised our supply chain risk as follows:

- High Risk (26%): 69 suppliers (ESG Score ≤ 40).
- Medium Risk (40%): 106 suppliers (ESG Score 41–60).
- Low Risk (33%): 88 suppliers (ESG Score 61+).

Interpreting "High Risk": It is important to contextualise the "High Risk" category. For the Symphony Group, this score primarily reflects a lack of visibility rather than any confirmed exploitation. As detailed in Section 3, many of these suppliers are small, regional operators who do not have public websites or formal ESG policies. Their "risk" stems from the absence of documentation (the "Policy Gap") rather than evidence of poor labour practices.

3.3 SPECIFIC RISK FINDINGS

- **The "Policy Gap":** The assessment highlighted that smaller suppliers often lack formal governance. The average score for Modern Slavery Statements was 36/100, and Whistleblower Policies also scored poorly. This creates a risk that if an incident were to occur, workers in these smaller businesses may not have a formal channel to report it.
- **High-Risk Sectors:** We identified clusters of suppliers in sectors with known modern slavery vulnerabilities such as construction & mining services which have a high prevalence of labour hire and transient workforces.

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- **Upstream Visibility (Conflict Minerals):** The assessment flagged a gap in Conflict Minerals due diligence (Average Score 28/100). While our direct suppliers are Australian, the low score indicates a lack of visibility into the upstream sourcing of electronics, batteries, and machinery components. This exposes the Symphony Group to the risk that raw materials (tin, tungsten, tantalum, gold) used in our equipment could be linked to forced labour or armed conflict globally.

4 ACTIONS TAKEN DURING THE REPORTING PERIOD TO ASSESS AND ADDRESS RISKS

As an inaugural reporter, our focus this year was on establishing a factual baseline and building the governance tools required for future management.

4.1 GOVERNANCE AND POLICY DEVELOPMENT

- **Supplier Code of Conduct Update:** We commenced a review of our Supplier Code of Conduct to explicitly prohibit forced, bonded, and child labour. The updated Code introduces a requirement for suppliers to cooperate with verification activities, ensuring we have the contractual right to investigate risks if they arise.
- **Strategy Shift:** Analysis of the "Policy Gap" led us to adopt a "Capacity Building" strategy. We determined that penalising small regional suppliers for lacking policies would be counter productive. Instead, we are developing guidance to help them meet our standards.

4.2 DUE DILIGENCE PROCESSES

- **Supply Chain Mapping:** We successfully mapped and assessed 263 suppliers providing the business with its first quantitative view of modern slavery risk.
- **Risk Categorisation:** Suppliers were segmented into High (26%), Medium (40%), and Low (33%) risk bands to allow for prioritised resource allocation.
- **Enhanced Verification:** We identified the 69 High-Risk suppliers and those in "adverse" industries as the priority cohort for the next phase of deeper verification.

4.3 REMEDIATION PROCESSES

- **Grievance Mechanism:** We have commenced the development of a confidential, grievance pathway. This will provide a mechanism for supplier workers to raise concerns

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directly with Symphony Group, bypassing the lack of whistleblower policies in their direct employment.

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5 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Symphony Group believes that "what gets measured gets managed." To ensure our actions are effective, we are in the process of establishing specific, quantifiable KPIs based on our initial risk assessment. We will track our progress against these targets in the next reporting period.

- **Coverage:** % of Tier-1 suppliers assessed or re-assessed each year (baseline: 263/347 ≈ 76%).
- **Risk reduction:** change in proportion of suppliers rated High Risk (baseline 26%). Symphony will track movement across risk bands annually.
- **Supplier Capacity Building:** number of supplier organisations and Symphony staff trained on modern slavery awareness.
- **Grievances & remediation:** number of supplier related reports received, investigated and remediated in accordance with Symphony's remediation framework.

6 CONSULTATION PROCESS

Internal Consultation: This statement was prepared with input from key internal stakeholders including legal and operations teams to ensuring a cross functional understanding of risk.

Consultation with Controlled Entities: The Symphony Group engaged with the entities listed in Appendix A for data collection to support this statement. Each entity provided data on their specific operations and supplier relationships. Regular ongoing meetings with operational leadership across the Lighthouse and Solas pillars will ensure alignment on the Symphony Group's risk assessment methodology and reporting obligations.

7 OTHER RELEVANT INFORMATION

Priorities for FY2025-2026 Looking ahead, our focus will shift from *assessment* to *action*:

1. **Launch the Remediation Pathway:** Finalise and publicise the grievance channel.
2. **Targeted Verification:** Conduct deep dive verification (SAQ's or audits) on the top 10 highest risk suppliers identified in the renewable energy, construction and labour hire sectors.
3. **Conflict Minerals:** Initiate a dialogue with our key electronics and equipment suppliers to understand their upstream traceability for conflict minerals.

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8 CONSULTATION AND APPROVAL

This Modern Slavery Statement has been approved by the Board of directors of Symphony Infrastructure Partners Pty Ltd.

Signature (responsible member):  Signed by:
Nathan Gooley
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Name: Nathan Gooley

Title: Director

Date: 22/12/2025

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9 APPENDIX A: REPORTING ENTITIES

Entity Name	ABN
RJE Global Pty Ltd	79 607 859 852
Catalpa Resources Pty Ltd.	88 164 113 866
Catalpa Construction Pty Ltd	82 164 893 529
Catalpa Management Resources Pty Ltd	73 162 503 460
Catalpa Energy Pty Ltd	71 143 778 394
Clutch Compliance Pty Ltd	92 653 640 209
Clutch Consulting Pty Ltd	68 166 259 936
Cowell Electric Supply Pty Ltd	13 626 950 829
ART Operating Company Pty Ltd	79 663 249 634
Australian Radio Towers Assets Pty Ltd	16 663 523 957
Horizon United Group Pty Ltd	19 626 222 580
Horizon United Pty Ltd	13 623 425 687
Horizon United Group Renewables Pty Ltd.	96 670 317 754
Horizon United Group NSW Pty Ltd	71 670 317 647
Horizon United Projects Pty Ltd	69 670 317 638
Solas Infrastructure Pty Ltd	53 677 554 139
Solas Assets Pty Ltd as trustee for the Solas Assets No. 1 Trust	96 601 798 266
Lighthouse Industries Pty Ltd	15 674 953 005
Energy 3 (NZ)	9429034549384 (NZBN)