



Australian Government



Modern Slavery Statement

2024-25



Contents

1. About this statement	3
2. From our Chair and CEO	3
3. Key actions	5
4. Structure, operations and supply chains	6
5. Our governance	11
6. Risk assessment and actions	14
7. Industry collaboration	24
8. Effectiveness: our progress and future commitments	24
9. Mandatory criteria	23
10. Appendix	24

1. About this statement

This statement reports on CEFC activities to identify, assess and address modern slavery risks in operations and supply chains for the year ending 30 June 2025. The statement has been prepared by the CEFC Global Fair Work (Modern Slavery) working group and approved by the CEFC Board.

This statement covers the operations and supply chains of the Clean Energy Finance Corporation (ABN 43 669 904 352) and its wholly owned subsidiary, CEFC Investments Pty Ltd (ACN 616 070 430) (**CIPL**). It has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**) and addresses the mandatory criteria set out in section 16(1) of the Act. All investment and procurement activities by CIPL are undertaken subject to the same investment guidelines and procurement policies and procedures as the CEFC. Whilst it has no employees, CIPL's directors are CEFC Executives and were consulted in the preparation of this Statement.¹

¹ Clean Energy Investment Management Pty Limited (ABN 60 628 443 854) (CEIM) was deregistered on 19 May 2024.

2. From our Chair and CEO

The 2024-25 year has once again been significant for those of us engaged in the clean energy sector and for our climate. Investing as our nation's 'green bank' to help counter the effects of climate change is about creating a sustainable future for households, businesses, farmers and climate tech investors, so that we thrive in the net zero economy for our future.

In providing this report about our 2024-25 performance, we are proud to share detailed information about our latest transactions, which featured a record \$4.7 billion in CEFC commitments, delivering \$25.7 billion in total transaction value. We made our largest-ever transactions in transmission, as well as accelerated the net zero ambitions of our co-investors across natural capital, property, transport and resources.

As Australia advances towards net zero, we remain steadfast in our commitment to understanding and addressing modern slavery risks within our operations and supply chains and the operations and supply chains of the sectors in which we invest. We recognise our responsibility to identify, assess and respond to these risks.

Our team has worked to update our Modern Slavery Policy and associated practices and focused on the specific risks within the clean energy supply chains, including those relating to electric vehicle financing.

Central to our approach is collaboration. Both with government and industry, we continue to improve our approach to identifying and assessing the risk of adverse human rights impacts in the complex supply chains supporting the clean energy sector.

This Statement:

- outlines our ongoing commitments to addressing modern slavery,
- details the frameworks that guide our approach, and
- shares the actions undertaken and challenges encountered during 2024-25.

This Statement was approved by the CEFC Board, the principal governing body of the CEFC, on 6 November 2025.



Steven Skala AO
Chair, CEFC



Ian Learmonth
CEO, CEFC

3. Key actions

During 2024-25 the CEFC took the following steps to develop and enhance our approach to identifying, assessing and addressing modern slavery in our operations and supply chains:

- Reviewed and updated our:
 - o Modern Slavery Policy: clarifying that the CEFC adopts a risk-based approach to determine the necessary level of due diligence required to identify, assess and address modern slavery, alongside providing more detail on factors considered in the due diligence process.
 - o Modern Slavery Practices and Procedures: changes include outlining prompt expectations between internal teams when changes in CEFC investments affect modern slavery risk assessments.
 - o Internal processes having regard to reports published by the Office of the New South Wales Office of the Anti-Slavery Commissioner (specifically, "Managing modern slavery risks in NSW Government procurement of electric vehicles: Which steps are reasonable?").
 - o Debt market platform processes to capture and assess suppliers introduced after the initial risk screening, with a focus on financiers specifically involved in electric vehicle financing and their management of modern slavery risks.
- Delivered:
 - o Induction training module on modern slavery to all CEFC's new employees.
 - o Supplementary modern slavery risk training was made available to all staff.
 - o Updates for our Board on modern slavery matters on a quarterly basis via the Audit & Risk Committee.
- Collaborated:
 - o With industry groups and direct counterparties to address shared challenges and opportunities.

A summary of our other key actions relating to modern slavery risks taken since 2019 is included in Appendix 1.

4. Structure, operations and supply chains

4.1 Clean Energy Finance Corporation

The CEFC is a specialist investor in Australia's transition to net zero emissions by 2050. With access to more than \$30 billion from the Australian Government, we work with co-investors, industry and government to drive economy-wide investment in decarbonisation. We invest in renewable energy, energy efficiency and low emissions technologies via the CEFC General Portfolio, the Rewiring the Nation Fund and four Specialised Investment Funds: the Household Energy Upgrades Fund, the Powering Australia Technology Fund, the Advancing Hydrogen Fund and the Clean Energy Innovation Fund. We are governed by an independent Board, which governs and oversees CEFC culture, investment decisions and risk management. Our Executive and staff bring considerable experience and expertise to our investment and decarbonisation task. In adopting a national approach to the emissions challenge, we invest with commercial rigour, aiming to deliver a positive return across our portfolio.

4.2 Our legislation

The *Clean Energy Finance Corporation Act 2012* established the CEFC. Among other things, it sets out:

- Our purpose
- Our function
- The roles and responsibilities of our Board, the CEO and our staff.

The object of the CEFC is set out in the CEFC Act being to “facilitate increased flows of finance into the clean energy sector and to facilitate the achievement of Australia's greenhouse gas emissions reduction targets”.² Under the CEFC Act, the Australian Government provides directions to the CEFC by issuing it with an investment mandate. The current Investment Mandate came into effect on 22 July 2023.

As a corporate Commonwealth entity, the activities of the CEFC and our staff are regulated by the *Public Governance, Performance and Accountability Act 2013* and its subordinate instruments.

As a financier, the CEFC is also subject to a range of other legislative requirements common to the sector. This includes obligations that are relevant to the management of modern slavery risks, including, but not limited to, Anti-Money Laundering and Counter-Terrorism Financing and foreign bribery.

² Section 3 of the Clean Energy Finance Corporation Act 2012 (Cth).

4.3 Employees and offices

Our employees

As at 30 June 2025, the CEFC had 175 employees. Of those, 11 employees were employed on a part-time basis. All of our workforce is located in Australia. Our employees are office-based professionals, performing skilled roles in delivering finance to the sector we operate in or in support roles across our corporate functions of legal, finance, IT, compliance and risk management, marketing and communications, investment research, stakeholder relations, sustainability, people and culture, and administration.

The CEFC is governed by an independent Board of 6 members who are jointly appointed by its two responsible Ministers.

The CEO is a statutory officer appointed by the Board, in consultation with the responsible Ministers. Our Executive team and staff are employed under terms and conditions approved by the Board. Employment agreements are based on the National Employment Standards (NES), with non-executive employees covered by the *Australian Government Industry Award 2016*. CEFC employees receive a fixed remuneration package reviewed annually and benchmarked against data from the Financial Industry Remuneration Group. Eligible employees are invited to participate in the CEFC High Performance Incentive Plan.

The CEFC is committed to the safety and health of its employees and acknowledges its responsibilities under the *Work Health and Safety Act 2011* (Cth) and the NES. These cover standard hours of work, reasonable additional hours, flexible working arrangements, the provision of personal/carer's leave and compassionate leave. The NES underpin the CEFC commitment to providing safe working hours and adopting a holistic view of employee health and wellbeing.

Our offices

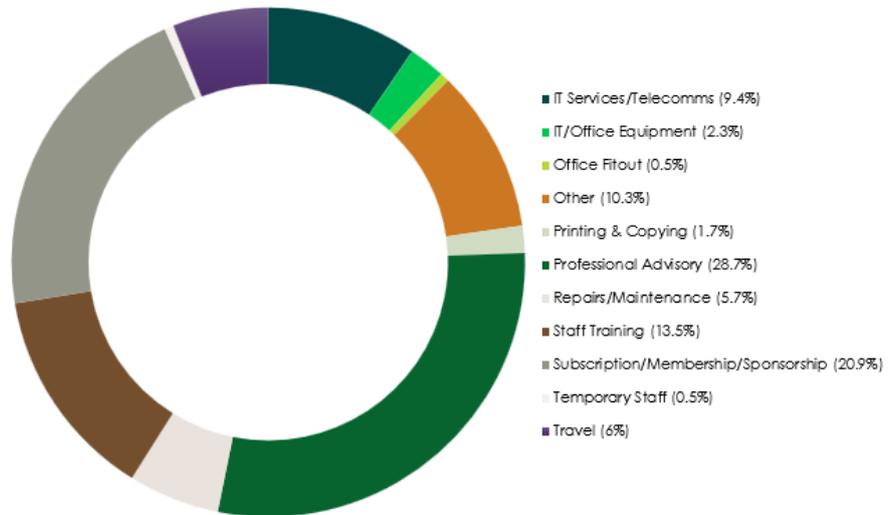
The CEFC has offices in Brisbane, Sydney, Melbourne, and Perth with a permanent staff member based in Canberra.

4.4 Direct procurement

In 2024-25, the CEFC directly contracted with 348 suppliers to provide goods and services.

These are classed as our direct suppliers.

Figure 1: Goods and services procurement by spend

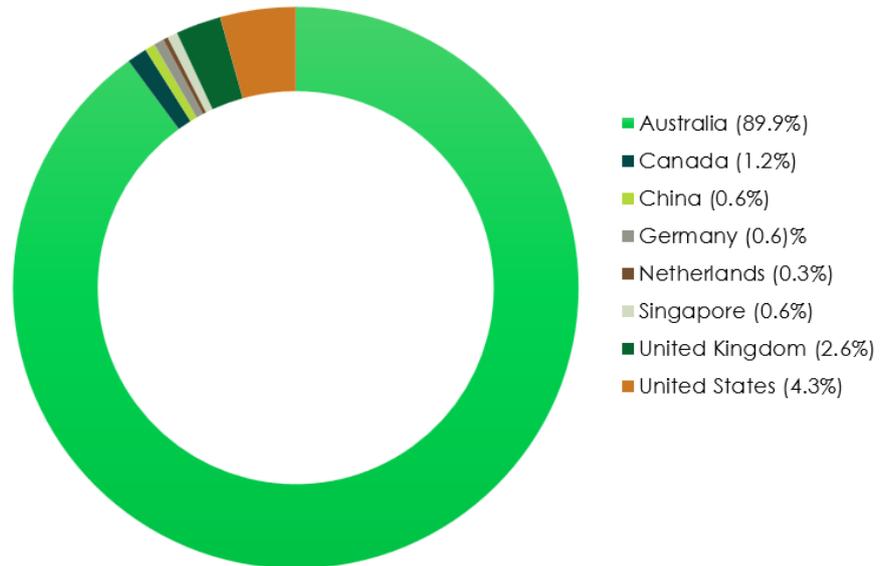


CEFC expenditure on the direct procurement of goods and services was approximately \$17 million, excluding investment management fees and permanent staff salaries.

Our direct suppliers

- Approximately 90% of our direct suppliers are based in Australia and are subject to Australian laws.
- Our direct overseas suppliers primarily provided information technology and subscription services.

Figure 2: Suppliers - geographic breakdown by total number of suppliers



Although most of our direct suppliers are in Australia and were assessed in previous reporting years as posing a low risk of modern slavery, we recognise that many local suppliers depend on global supply chains to deliver their goods and services. Accordingly, there is a potential for exposure to modern slavery risk beyond tier 1 of our supply chain irrespective of whether a supplier is based in Australia or overseas.

4.5 Collaboration arrangements

The CEFC regularly engages with various entities as part of our operations to discharge our statutory functions. We collaborate with entities including the Australian Renewable Energy Agency, the Clean Energy Regulator, the federal Department of Climate Change, Energy, the Environment and Water, the Department of Finance, and various other Commonwealth, State and Territory governments and agencies.

These collaboration arrangements may be formal or informal, including letters of support, memoranda of understanding or they may be by way of supporting industry events, panel discussions and working groups.

4.6 Investment activities

CEFC investments across the Australian economy to address market gaps, crowd in new sources of capital and demonstrate the benefits of investing through the lens of achieving emissions reduction and decarbonisation outcomes.



5. Our governance

5.1 Key documents

The CEFC Investment Policies embody the investment strategy, benchmarks, and standards for assessing performance and investment risk management for the CEFC. The CEFC operates under an enterprise Risk Management Framework designed to identify and effectively manage risk, including risks associated with environmental, social and governance (ESG) factors.

During 2024-25 we updated CEFC policies, practices and procedures to enhance our ability to identify, assess and address modern slavery risks across our business activities and to support our modern slavery risk management framework. We continued to engage a third party service provider to produce labour and human rights reports on material and higher risk counterparties as a secondary level of assurance of our risk management processes.

The ESG portfolio monitoring platform is ongoingly utilised by the portfolio management team to support oversight of modern slavery risk management in CEFC investments.

Our ESG/Modern Slavery framework that continued to operate during the reporting period comprises:

- [Modern Slavery Policy](#)
- Modern Slavery Practices and Procedures
- [CEFC Principles for Suppliers](#)
- [Environmental, Social and Governance \(ESG\) Policy](#)
- ESG Policy implementation
- Modern Slavery Remediation Framework
- Modern Slavery assurance guidance
- Modern Slavery Register
- Modern Slavery Incident Register
- Modern Slavery Contract Clauses
- Supplier Assessment Questionnaire
- Risk Management Framework

5.2 Working group

Our Global Fair Work (Modern Slavery) working group oversees implementation of our modern slavery framework. Progress reports are made by the working group on a quarterly basis to the Executive Risk Committee and the Audit and Risk Committee.

Members of the working group contribute towards the development of modern slavery risk awareness training, share tools and resources, monitor regulatory developments and engage with internal stakeholders to communicate any updates to our modern slavery risk management framework.

The working group is made up of representatives from across the CEFC, including the portfolio management, finance and people & culture teams, and is led by members of the Risk & Compliance team.

5.3 Training and awareness

CEFC staff are required to complete a modern slavery training module as part of their induction program and on an ongoing basis as part of their mandatory ongoing training requirements.

In 2024-25, we collaborated with a social enterprise to deliver modern slavery risk awareness training to our staff. This initiative reinforced our efforts to provide guidance on our internal practices and procedures and included detailed case studies highlighting instances of forced labour both globally and within Australia.

To support the training, we also published material on the CEFC intranet outlining sectors inherently exposed to modern slavery risks and detailing how the CEFC addresses these risks through our investment decision making process, from an early stage through to ongoing monitoring.

5.4 Modern Slavery Risk Assurance Guidance

In 2023-24, we created an internal assurance guide to monitor and assess the implementation of our modern slavery risk management framework and its controls. The assurance guide will continue to be developed and refined.

6. Risk assessment and actions

6.1 Overview

We consider modern slavery risks in relation to the following three key areas:

- Employment
- Investments
- Procurement supply chains

6.2 Operations

Risk in our operations

Employment of staff

The financial services and investment industry that we operate in is generally considered to have workforces with a lower risk of modern slavery largely given the proportion of office-based skilled workers with formal qualifications who are typically not vulnerable to modern slavery.

CEFC employment terms and conditions are formalised with individual employment agreements based on National Employment Standards that establish minimum conditions of employment for our employees. All employees are screened via an independent service provider, which includes identity and police checks. Non-executive employees are covered by the Australian Government Industry Award 2016.

CEFC is committed to protecting employee rights and working conditions. This commitment is demonstrated through the application of our Code of Conduct and Ethics, conducting staff surveys and maintaining grievance mechanisms both through our People & Culture team and, more broadly, the *Public Interest Disclosure Act 2013* policies and procedures. We assessed there to be a lower risk of having caused or contributed to modern slavery in our direct employment of staff.

This assessment is further supported by the low risk profile of our industry being an office-based professional services organisation and with our office locations being limited to Australia, a jurisdiction with a lower prevalence of, and vulnerability to, modern slavery according to the Global Slavery Index³. Our employee remuneration processes include benchmarking, compliance with applicable laws and the undertaking of annual performance reviews.

³ Global Slavery Index 2023
<https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

Investments

CEFC investments are exposed to potential modern slavery risks within elements of their associated supply chains. As such, investment opportunities and associated direct and material indirect counterparties are assessed for such risks at an early stage, based on the information available at the time.

Our investments, which include investments in renewable energy, infrastructure and the broader built environment, are associated with complex supply chains, and include inherent risks such as forced labour, including state sanctioned forced labour, and low-skilled migrant workers who may be vulnerable to exploitation, and debt bondage.

The risk of modern slavery within the supply chains associated with the raw material inputs and manufacturing of renewable technologies continues to be high. Much manufacturing takes place outside Australia in jurisdictions with high risk of modern slavery practices, where the supply chains are exposed to potential forced labour risks, and being remote from Australia, determinative independent audit and verification of supply chains may be difficult.

Renewables

The common use of sub-contracted labour in the infrastructure sector heightens the risk of modern slavery. For instance, employing migrant labour performing unskilled or low skilled labour, utilising unscrupulous labour hire agencies, or having multiple layers of subcontracting makes it more challenging to effectively assess labour practices associated with our investments.

Infrastructure

The supply chain for building materials, and labour hire practices for construction, and property management services carries a heightened risk of modern slavery. This risk is particularly pronounced when agencies are used to hire migrant and lower-skilled workers, or when there are multi-layered sub-contracting structures. While the Australian property sector has implemented a demonstrated due diligence process to mitigate modern slavery risks at the Tier 1 level, we recognise that addressing supply chain risks beyond Tier 1 remains a challenge.

Built environment

Forced labour, debt bondage and deceptive recruiting have been associated with the agriculture sector in Australia. The sector relies upon temporary migrant and low-wage workers who are particularly vulnerable, often due to restrictive visa conditions that limit their ability to change employers, or report concerns out of fear of deportation.

Agriculture

Actions to address risks in our operations

Employment of staff

Employment contracts are subject to Australian laws and include:

- Clear statements of remuneration,
- Leave entitlements,
- Expectations of employees.

CEFC employees receive a fixed remuneration package reviewed annually and benchmarked against data from the Financial Industry Remuneration Group. Eligible employees are invited to participate in the CEFC High Performance Incentive Plan. Flexible working arrangements are offered under the National Employment Standards. We provide a safe and engaging environment for staff, featuring a range of initiatives to enhance the work, health and safety of our employees. Importantly, our employees are trained to understand modern slavery red flags and how to raise concerns.

The CEFC employee screening process includes independent identity verification, a review of individuals' employment history and eligibility to work in Australia, along with police checks.

Investments

To identify, assess and mitigate human rights risks, including modern slavery risks, due diligence commences at the beginning stages of the investment lifecycle and continues throughout with ongoing monitoring post execution of an investment.

Through our due diligence, we seek to understand risks associated with both modern slavery and human rights more broadly, apply specific evaluation processes on a case-by-case basis, and understand how the risks are being assessed, mitigated and managed.

We assign a risk rating of "low", "medium" or "high". This rating guides CEFC's internal requirements for what further actions, such as additional due diligence, and monitoring requirements, requesting contractual modern slavery clauses, commissioning external due diligence reports, ongoing reporting and annual reviews. To determine a risk rating, we assess several risk categories, including but not limited to:

Industry risks – Industries that depend on low-skilled or temporary labour, especially those engaged in offshore activities, may face inherent risks related to modern slavery.

Geographic risks – Certain jurisdictions where direct and indirect suppliers are located pose higher risks. Using the Global Slavery Index 2023 helps us to identify countries with higher exposure to modern slavery risk.⁴

Business models and contracting arrangements - Third-party labour arrangements, the outsourcing of significant labour needs and

⁴ Global Slavery Index 2023
<https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

overly complex contracting structures increase complexity in a company's supply chain and the risk of exposure to modern slavery.

Supply chain risks – The complex nature and multi-sourced supply chains of renewable technologies, such as solar panels and wind turbines, pose traceability challenges and potential modern slavery risks across various sectors and regions.

Counterparty history - Counterparties with a negative track record and/or violations in human rights, health and safety, labour standards, and business ethics could potentially signal a greater risk of modern slavery.

In 2024-25 we completed due diligence on all 27 of our new investments⁵ for modern slavery risks. Eight new investments were assessed as medium or high risk for modern slavery. Further engagement, due diligence and contractual provisions were completed for these investments on a case-by-case basis.

The due diligence included reviewing relevant modern slavery allegations, statements, policies and management approaches. We engaged directly with counterparties where more information was required, or where we want to understand how our project counterparties operationalise their modern slavery policies and procedures. This engagement occurs both at the outset during our initial due diligence and subsequently throughout the investment as needed. To assess the application of these processes and procedures, we analyse the documentation and, where relevant, request evidence of measures taken to identify, assess and manage risks.

We synthesise the available information to make a residual risk assessment of the investment and any further required actions. Our risk rating considers both inherent risks and the effectiveness of a counterparty's controls to mitigate those risks.

Demonstration of our process

In 2024-25, we applied our standard due diligence procedures for a project under consideration for financing. During our review, we identified that one of the prospective project suppliers has a subsidiary included on the Uyghur Forced Labour Prevention Act (UFLPA) entity list.

This finding was escalated to the Chief Risk Officer. We requested further details from the project counterparties regarding their own due diligence measures and the steps they taken to mitigate the identified modern slavery risks.

⁵ A reputational risk and modern slavery assessment was not required to be refreshed for a number of follow-on transactions with the same counterparties.

Case study: Modern slavery risks in the electric vehicle financing

In 2024-25, we commenced a review of the funding activity in the debt markets platform, focusing on modern slavery risks in the electric vehicle (EV) financing sector. The review was planned in three stages. As at 30 June 2025, the first two stages were completed. The third stage is scheduled to be completed in 2025-26.

The first stage involved analysing public documentation relating to modern slavery risks for three of the financiers of electric vehicles in Australia and the top five electric vehicles they financed. This included modern slavery statements, policies, reports, and media, which supplemented and updated our understanding of each financier's and EV manufacturer's management of modern slavery risks.

The second stage involved analysing information from various open source and subscription sources to assess the relative modern slavery risks and management strategies employed by financiers and EV manufacturers. The analysis confirmed that modern slavery risk is inherently low in the operations and supply chains of financiers but significantly higher within EV supply chains. For example, cobalt is a critical mineral for EV batteries. Cobalt mining in the Democratic Republic of Congo has been reported to involve child labour.

Key findings and insights from stage one and two:

Financiers

Policies and practices: Two out of the three financiers publish modern slavery statements. The third financier is not a reporting entity under the Modern Slavery Act, however, its major shareholder publishes a modern slavery statement which expects companies they invest in to recognise and manage relevant modern slavery considerations. Only one financier has a publicly available human rights policy.

Risk management practices: Two out of three financiers have a whistleblower policy, and one has a Supplier Code of Conduct policy.

Risk ratings: All three financiers had low modern slavery jurisdiction risk based on human rights benchmarking reports. None of the financiers were subject to any known allegations or adverse media coverage relating to human rights or modern slavery risks.

EV Manufacturers

Policies and practices: Eight out of the nine EV manufacturers publish Modern Slavery Statements, and seven have a publicly available human rights policy. However, three companies had human rights allegations against them.

Risk Management practices: seven out of the nine EV companies demonstrated core labour rights and modern slavery risk management commitments through memberships, including membership to at least one of the following, the United Nations Global Compact, Responsible Business Alliance, and Responsible Miners Initiative. Six out of the nine EV companies have supporting policies, including Responsible sourcing policies. Eight out of the nine EV companies had a whistleblower policy and a Supplier Code of Conduct Policy.

Risk ratings: Eight out of nine EV companies had a high global slavery exposure risk rating, and three companies had a high modern slavery jurisdiction risk. The ratings are based on human rights benchmarking reports.

Third stage

The CEFC will engage with the financiers to obtain updates on the systems and processes they have in place to identify, mitigate and prevent modern slavery risks within their financing activities. This engagement will focus on understanding how these financiers are addressing modern slavery challenges associated with the EV sector.

6.3 Supply chain & collaboration agreements

Our direct procurement supply chain is comparatively small and primarily domestic. Even so, we acknowledge the CEFC is exposed to risk of modern slavery through the goods and services we source directly from domestic suppliers (including those with global supply chains) with an estimated 41,000 people living in modern slavery in Australia. We understand the goods we procure from higher risk industries, such as office equipment and electronic goods, pose a higher inherent risk of having modern slavery in associated supply chains.

Risk in our procurement supply chains

We have assessed that there is an overall low risk of having caused or contributed to modern slavery in our procurement of goods and services, however, we acknowledge that we may be indirectly linked to increased modern slavery risks via the supply chains of our direct suppliers. To address this, we conduct reviews and assess our suppliers.

Like previous reporting years, in 2024-25 some of our procurement suppliers included inherently higher risk categories⁶ including:

IT/Office Equipment	Modern slavery, including child and forced labour, is a significant risk in electronics supply chains due to complex subcontracting, vulnerable migrant workers, and weak regulations hindering oversight and worker protections.
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Lease/office space	Services associated with office spaces, such as cleaning and security, are often outsourced and rely on migrant or low-paid workers, working dangerous jobs which may lead to exploitative working conditions through opaque labour hire arrangements.
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Commercial office fit out	Materials associated with fit outs may be sourced from high-risk countries, often spanning multiple countries making traceability difficult, or involve subcontracted labour with poor oversight. Child and forced labour have been identified in building material supply chains. Temporary migrant workers in Australia are vulnerable to exploitation including underpayment, deceptive recruiting and debt bondage.
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⁶ Description of these risks are reflective of the Office of the Anti-Slavery Commissioner Inherent Risk Identification Tool (IRIT)

Risks associated with paper manufacturing and forestry activities include heightened exposure to forced labour in certain countries, especially for vulnerable groups such as children, migrants and informal workers. Paper production in certain regions is exposed to risks of state-imposed forced labour. Additional upstream risks are connected to timber, wood, and PVC supply chains.

Printing and copying

Often involve subcontracted or casual labour, with workers vulnerable to underpayment, unsafe working conditions, or lack of legal protections. Temporary migrant workers in Australia are vulnerable to exploitation including underpayment, deceptive recruiting and debt bondage.

Repairs/maintenance

The use of labour hire agencies and the reliance of low-wage workers make the travel sector at risk of modern slavery. The travel industry, including hotels, relies on a casual workforce with high turnover often employing temporary migrant workers, student and women who are vulnerable to modern slavery risks.

Travel

Commonwealth Procurement Rules are not applicable to the CEFC, however, we use the Whole of Government Travel arrangement for work travel and is thus at a risk level commensurate with all participating Australian Government agencies. Similarly, we use the Whole of Australian Government Stationery and Office Supplies arrangement for stationery and office supplies.

Over half of our suppliers were professional services firms, subscription/membership agreements and staff training, each of which supported us in our corporate and investment operations. The majority of the CEFC suppliers were assessed as having a low modern slavery risk.

Actions to address the risk in our procurement supply chains & collaboration agreements

The CEFC procurement activities are underpinned by core principles, including ethical dealing. Our procurement management process provides a risk-based framework for managing third party relationships consistent with regulatory guidance.

The non-investment modern slavery risk assessment is designed to assist the CEFC to identify and manage potential risks in the goods and services we procure. The CEFC performs due diligence on suppliers that meet the cumulative \$10,000 or more threshold. When assessing the risk, we consider the goods or services the supplier is providing and the following factors:

- Sector / Industry
- Type of products and services

- Geographic regions / jurisdiction
- Type of entities involved
- Business models and contracting arrangements
- Modern slavery risk management practices including modern slavery statements

We gather supplier information and check for issues or breaches using media, WorldCheck, and reports like NGO reviews and sustainability documents.

Suppliers subject to the non-investment contract process are automatically sent our Modern Slavery Policy and the CEFC Principles for Suppliers to build awareness of modern slavery and to communicate our expectations. The CEFC Modern Slavery Policy and CEFC Principles for Suppliers are updated annually.

Medium or high risk suppliers must respond acknowledging the Modern Slavery Policy and the CEFC Principles for Suppliers, which is uploaded to the Modern Slavery Register. We may also activate media monitoring of these suppliers and request additional information, including requesting copies of the policies and processes, or requesting they complete our modern slavery questionnaire if required.

The CEFC staff request a non-investment modern slavery risk assessment relating to all proposed procurements and to include supplier details to the Modern Slavery Register before agreements are signed. This process precedes the formal execution of a contract to support modern slavery risk assessments. Staff are trained in relation to the non-investment contract process, so they are aware of, understand, and can assist in the implementation of the CEFC modern slavery risk assessment process for non-investment contracts.

Collaboration arrangement requests may be generated from all parts of the CEFC. The collaboration arrangement officer must submit proposed collaboration entity details in the Modern Slavery register as part of their request for the non-investment contract review. Each new collaboration arrangement is assessed for risks of modern slavery. The Collaboration Arrangement Officer is responsible for actioning any recommendations resulting from the assessment, including sharing our CEFC Principles for Suppliers and Modern Slavery Policy.

In 2024-25 we screened 118 direct suppliers for modern slavery risks⁷.

For suppliers who meet the expenditure threshold, the CEFC Modern Slavery Risk Register records:

- Adverse media findings
- Politically Exposed Persons and sanctions matches
- Supplier modern slavery due diligence and other processes (including any published Modern Slavery Statement and other modern slavery mitigation measures they apply as evidenced by open-source information)
- Modern Slavery Risk Rating

⁷ Unless directed by the Risk and Compliance team, modern slavery risk assessments are not required where the procurement contract or contracts with a particular supplier have a cumulative value of less than \$10,000 per annum (exclusive of GST).

- Confirmation that the Modern Slavery Policy and Principles for Suppliers have been sent to the counterparty and, for medium or high-risk ratings, confirmation of acknowledgments of receipt by the supplier (if appropriate)
- Any additional actions and responses received from the supplier in response to the CEFC required actions.

Supplier payment times

Paying suppliers on time can improve cash flow and boost employment and wages. Although the underpayment of workers (suppliers) is not considered a form of modern slavery, we acknowledge that paying suppliers on time may reduce the risk of worker exploitation. In 2024-25, we typically paid suppliers within nine days (on average). Our overseas suppliers are paid within 21 days (on average).

The CEFC monitors the timing of supplier payments and reports these under the Payment Times Reporting Scheme. □

7. Industry collaboration

The CEFC remains committed to raising awareness directly via our investment activities, working alongside other government agencies, committees and industry bodies. During 2024-25, we collaborated with a number of Commonwealth specialist investment vehicles (SIVs) to share our modern slavery risk framework, including the due diligence process we complete for proposed investments, sharing resources and templates for their consideration.

In 2024-25, we continued to work with relevant stakeholders to address shared challenges and opportunities in the renewable energy sector, including attending the Clean Energy Council (CEC) Modern Slavery Working Group and Responsible Investment Association Australasia Human Rights Working Group meetings along with other multi-industry stakeholders.

We also participated in the CEC sub-group working alongside other multi-industry stakeholders to compile and provide feedback to the NSW Anti-Slavery Commissioner in developing a code of practice on managing modern slavery risks in renewable energy value chains.

Collaboration

The CEFC engaged directly with representatives from the National Reconstruction Fund Corporation (NRFC) to share insights into our approach to modern slavery risk due diligence, including assessment, monitoring, and mitigation strategies. This included a walkthrough of our internal frameworks and the provision of practical resources, such as reporting templates, tools, and key reports, to assist NRFC in building out its own modern slavery risk management capability.

CEFC's collaboration with other entities contributes to the development and evolution of modern slavery risk management practices. In addition, the CEFC also contributes to broader industry efforts to address supply chain risks through our membership in relevant working groups.

8. Effectiveness: our progress and future commitments

We understand the importance of assessing and reflecting on the effectiveness of our Modern Slavery Risk Management Framework to identify what is working well, areas for improvement/enhancements to ensure we are assessing modern slavery risks in our operations and supply chains and addressing them appropriately when identified.

Effectiveness is assessed through the following initiatives and monitoring.

Figure 3: How we are strengthening our approach to modern slavery

Goal	2025+ Plan	Comments
Operationalise internal capabilities for the risk factors in our ESG Policy and embed the process into our internal monitoring data base to enable our portfolio managers to undertake periodic reviews of counterparties as necessary.	Review funding activity in our debt markets platform to identify and assess indirect suppliers introduced to our investment after our initial screening of the modern slavery risks.	We reviewed the funding activity in our debt markets platform during the 2024-25 reporting year. See Case Study 1. In 2025-26, we will contact the debt market platforms reviewed for consultation and an update on their modern slavery risk management practices.
Develop the 2024-25 training and communication plan to continue to improve staff awareness.	Continue to train 100% of our permanent staff and report this to our Board. Deliver targeted training for staff. Assess the effectiveness of the training by seeking feedback from staff through post training surveys and focus groups.	100% of new CEFC staff completed the annual modern slavery risk training module. All staff training was delivered during the year. See Section 5.3. Feedback was sought from attendees in a post training survey. In 2025-26, all staff will complete the modern slavery risk training module as part of the annual refresher risk and compliance training. We will review the responses to the modern slavery compliance training module to assess comprehension and identify and address any gaps in staff knowledge and comprehension.
Continue to develop our approach to increase impact where the CEFC influence is greatest.	Continue to collaborate with our investment and non-investment counterparties to better understand how the risks of modern slavery are managed and how best to address the associated risks in their operations and supply chains.	We engaged with investment counterparties and non-investment counterparties and sought additional due diligence and assurance where we identified potential for higher risks of modern slavery.
Continue to monitor regulatory developments and Commonwealth and State and Territory emerging guidelines.	Continue monitoring regulatory developments. Continue to monitor and apply guidelines to our modern slavery practices and procedures as relevant.	We continue to monitor regulatory developments and update our practices and procedures as appropriate. In 2025-26, we will continue to monitor publicly available information relating to modern slavery risks in the renewables sector and guidance relating to the management of those risks. Apply additional mitigants where applicable.

Goal	2025+ Plan	Comments
Continue to engage with industry bodies and participate in relevant working groups.	Continue collaborating with industry bodies and participating in external working groups.	<p>The CEFC participated in the industry partnership with the NSW Anti-Slavery Commissioner in developing a code of practice on managing modern slavery risks in renewable energy value chains.</p> <p>Continued to work with relevant stakeholders to address shared challenges and opportunities in the renewable energy sector.</p>
Review our relevant policies and procedures.	Review and update the Modern Slavery Policy, Principles for Suppliers and Practices and Procedures in line with relevant guidance and legislative changes.	Modern Slavery Policy, Principles for Suppliers and Practices and Procedures have all been reviewed and updated in the reporting period.
<p>Engage with suppliers beyond the first tier.</p> <p>Review our Modern Slavery Questionnaire and add specific questions regarding steps that our counterparties have taken to provide a grievance mechanism in respect of relevant associated supply chains.</p>	Select and engage with suppliers with whom we have an ongoing relationship, prioritising the areas of highest risk of modern slavery to better understand their processes to identify and manage the risks of modern slavery in their supply chains, and collaborate to address the findings.	<p>We sought to understand how our project counterparties operationalise their modern slavery policies and procedures in relation to their supply chains as part of our due diligence.</p> <p>In 2025-26, we will seek to identify if our project counterparties have grievance mechanisms in place.</p> <p>In 2025-26, we will select and engage with suppliers with whom we have an ongoing relationship prioritising the areas of highest risk.</p>

Goal	2025+ Plan	Comments
Collaborate with counterparties seeking to include modern slavery provisions in each investment and procurement contract.	<p>For investment contracts, continue to seek to include modern slavery provisions in our contracts for medium and high-risk investments, and seek to confirm compliance with these provisions.</p> <p>For procurement contracts, we will seek to include modern slavery provisions in contracts for medium and high-risk contracts.</p>	<p>Investments:</p> <p>This reporting period, modern slavery provisions were included in all our direct investment agreements for CEFC debt investments. The scope of those provisions varied depending on a CEFC assessment of modern slavery risk in associated operations and supply chains and of that counterparty's modern slavery risk management procedures.</p> <p>For CEFC equity investments, modern slavery provisions were included in investment documents where appropriate. Where express provisions have not been included, CEFC is able to exercise oversight through its nominee director.</p> <p>Procurement:</p> <p>This reporting period we provided copies of our Modern Slavery Policy and CEFC Principles for Suppliers to our non-investment contract counterparties to communicate our expectations.</p>
Continue risk reviews as business as usual for all investments and medium and high risk rated non-investment contracts.	Continue risk reviews as part of our business-as-usual activity.	<p>Investments:</p> <p>In the 2024-25 year, we screened 27 new executed investments for modern slavery risks.</p> <p>Procurement:</p> <p>In the 2024-25 year, we screened 118 new direct suppliers for modern slavery risks.</p>
Continue to improve the way we assess and document our effectiveness in identifying and managing modern slavery risk.	Continue to monitor results from our ESG Risks Management Plan and engage with relevant internal and external stakeholders as required.	<p>The ESG Risk Management Plan is embedded in our Portfolio Management handover process.</p> <p>The Portfolio Management team work with the investment teams and the Risk and Compliance team to understand and set the ongoing modern slavery risk management and monitoring requirements of each investment.</p>

Goal	2025+ Plan	Comments
Develop our internal assurance framework to monitor and verify implementation of procedures to manage modern slavery risks across the CEFC.	Continue developing our modern slavery assurance framework by formalising our assurance process which feeds into our assurance guidance	Ongoing. We will continue to develop our modern slavery assurance activities.
Assess the effectiveness of our grievance mechanism process and if it could be improved.	Continue to assess potential for improvement, including considering relevant industry guidance and apply that to CEFC processes where applicable.	<p>No cases of modern slavery identified through our internal grievance mechanisms.</p> <p>No cases of modern slavery identified from external reporting.</p> <p>Noting this is not evidence of there being no associated circumstances of modern slavery.</p>

9. Mandatory criteria

How this statement addresses the mandatory criteria in the *Modern Slavery Act 2018* (Cth)

Figure 4: Mandatory criteria of the Modern Slavery Act 2018

Mandatory criteria	Section	Page
16(1)(a) Identify reporting entity	About this statement	3
16(1)(b) Describe the reporting entity's structure, operations, and supply chains	Structure, operations and supply chains	4-9
16(1)(c) Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risk assessments and actions	12-20
16(1)(d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Key actions Risk assessments and actions	4, 12-20
16(1)(e) Describe how the reporting entity assesses the effectiveness of these actions	Effectiveness: our progress and future commitments	22-25
16(1)(f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	About this statement	3
16(1)(g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	Effectiveness: our progress and future commitments	22-25

10. Appendix

Since the *Modern Slavery Act (2018)* was introduced, the CEFC has taken steps to identify, assess and address Modern Slavery including:

2019-20

- Established the Global Fair Work (Modern Slavery) Working Group
- Introduced the CEFC Modern Slavery Policy
- Published the first CEFC Modern Slavery Statement
- Published the CEFC Principles for Suppliers to provide a clear expectation of the behaviour and standard the CEFC expects of its suppliers
- Mapped our procurement supply chains by identifying tier one suppliers where the supply contracts exceeded a prescribed monetary value, applying open-sourced due diligence
- Added modern slavery risk screening to reputational due diligence process for investment key counterparties.

2020-21

- Introduced the CEFC Environmental and Social Governance (ESG) Policy
- Engaged external human rights subject matter experts to conduct a review of our modern slavery processes and conduct an associated benchmarking exercise
- Introduced an organisation-wide modern slavery training program
- Delivered function specific training for the Risk and Compliance, and Legal teams.

2021-22

- Implemented the CEFC Modern Slavery Remediation Framework to guide our approach where instances of modern slavery are identified in our operations and supply chains
- Implemented the CEFC Modern Slavery Incident Register
- Delivered function specific training to the CEFC Origination and Portfolio Management teams regarding the implementation of the CEFC Modern Slavery Policy and associated practices and procedures
- Conducted a review and update of the CEFC Modern Slavery Policy
- Considered and adopted key recommendations of the benchmarking exercise undertaken by external human rights subject matter experts
- Conducted a review and update of our procurement contract processes, to include a mandatory modern slavery risk assessment for suppliers with a contract value of \$10,000 or more
- Implemented improved monitoring process by including “do no harm” factors in investment reputational risk screening processes
- Continued to collaborate with industry and Commonwealth agencies on relevant matters.

2022-23

- Established and delivered a Modern Slavery Risk Plan (that now forms part of our ESG risks and opportunities plan) and delivered associated training to our Portfolio Management team
- Collaborated with our external fund managers
- Kept our staff up to date with our Modern Slavery Risk Management framework by creating a resource intranet site and delivered external subject matter expert training to our Board and Executive team
- Participated as a panel member alongside industry representatives at a Clean Energy Council forum “Addressing Modern Slavery in the Clean Energy Sector” facilitated by Norton Rose Fulbright.

2023-24

- Established guidance on the modern slavery assurance process to provide to CEFC Portfolio Management team
- Collaborated and engaged with industry groups and direct counterparties to address shared challenges and opportunities. This collaboration included participation in working groups, joint forums, and knowledge exchange sessions
- Delivered targeted training to staff and the CEFC board on modern slavery, designed to equip staff and Board members with the latest information on identifying and managing modern slavery risks.
- Reviewed and updated our modern slavery risk management policies and procedures

About the CEFC

The CEFC is a specialist investor in Australia's transition to net zero emissions by 2050. With access to more than \$30 billion from the Australian Government, we work with co-investors, industry and government to drive economy-wide investment in decarbonisation. We invest in renewable energy, energy efficiency and low emissions technologies via the CEFC General Portfolio, the Rewiring the Nation Fund and four Specialised Investment Funds: the Household Energy Upgrades Fund, the Powering Australia Technology Fund, the Advancing Hydrogen Fund and the Clean Energy Innovation Fund. We are governed by an Independent Board, which provides prudent oversight and governance of CEFC culture, investment decisions and risk management. Our Executive and staff bring considerable experience and expertise to our investment and decarbonisation task. In adopting a national approach to the emissions challenge, we invest with commercial rigour, aiming to deliver a positive return across our portfolio.

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