

JOINT MODERN SLAVERY STATEMENT

Pioneer Sail Holdings Pty Ltd (and its subsidiaries)

Reporting Period: 1 January 2024 – 31 December 2024

Pursuant to section 14 of the Modern Slavery Act 2018 (Cth) for the following mandatory reporting entities:

- Pioneer Sail Holdings Pty Ltd – ABN 45 617 844 569
- Pioneer Sail Australia Pty Ltd – ABN 91 617 846 385
- Alinta Energy Pty Ltd – ABN 64 614 975 629
- Latrobe Valley Power (Holdings) Pty Ltd – ABN 57 621 363 102



alintaenergy

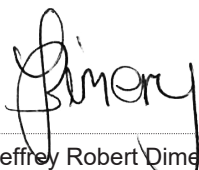
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BOARD APPROVAL

Pioneer Sail Holdings Pty Ltd – ABN 45 617 844 569


Insofar as this Statement relates to Pioneer Sail Holdings Pty Ltd and its subsidiaries, the Board (as principal governing body) approves the Statement.



Jeffrey Robert Dimery
Director, Pioneer Sail Holdings Pty Ltd

Pioneer Sail Australia Pty Ltd – ABN 91 617 846 385


Insofar as this Statement relates to Pioneer Sail Australia Pty Ltd and its subsidiaries, the Board (as principal governing body) approves the Statement.



Jeffrey Robert Dimery
Director, Pioneer Sail Australia Pty Ltd

Alinta Energy Pty Ltd – ABN 64 614 975 629

Insofar as this Statement relates to Alinta Energy Pty Ltd and its subsidiaries, the Board (as principal governing body) approves the Statement.



Anthony John Howarth
Director, Alinta Energy Pty Ltd

Latrobe Valley Power (Holdings) Pty Ltd – ABN 57 621 363 102

Insofar as this Statement relates to Latrobe Valley Power (Holdings) Pty Ltd and its subsidiaries, the Board (as principal governing body) approves the Statement.



Greg Lewin
Director, Latrobe Valley Power (Holdings) Pty Ltd

INTRODUCTION

Pioneer Sail Holdings and its subsidiaries Pioneer Sail Australia, Alinta Energy and Latrobe Valley Power (collectively, the Reporting Entities) are committed to doing business fairly and ethically.

Modern slavery is a significant problem globally, impacting some 50 million people. It is broad in its scope and includes slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery-like practices, forced marriage and deceptive recruiting for labour or services. It also exists in Australia, particularly within supply chains.

This Modern Slavery Statement, covering the period 1 January 2024 to 31 December 2024, outlines our activities as part of our ongoing commitment to collaborate with governments, suppliers, and stakeholders in addressing modern slavery. It is our fifth public statement on this issue.

We made improvements to our internal processes in this reporting period. Of note, we implemented a new due diligence software system to give us better visibility over our supply chains.

No modern slavery grievances were reported to our whistleblower hotlines during the reporting period, and we did not become aware of substantiated instances of modern slavery within our current supply chains through other means. We remain committed to continuous improvements to investigation, due diligence and grievance processes.

We continue our work to find solutions to challenges common to many similar entities, which include:

- A large number of suppliers within complex supply chains.
- A decentralised procurement model, requiring awareness and relevant skills across a large number of buyers.
- External guidance which is sometimes high-level and theoretical.
- Limited transparency with specific case studies from which we can learn.
- Conflicting information from various sources.
- The potential limitations of data obtained directly from suppliers.
- The opaqueness of globalised supply chains and specific manufacturing regions.

During 2024 we built upon our efforts to raise awareness across our businesses and to improve our controls. We have started to better streamline processes, particularly our supplier self-assessment questionnaires, to reduce the burden on low-risk suppliers.

We also continued to develop our network of experts and peers to ensure we keep abreast of evolving practices in our industry. This included ongoing participation in the Clean Energy Council's Managing Risks of Modern Slavery Working Group, attending sessions run by the NSW Anti-Slavery Commissioner and conferring with peers responsible for managing the risks of modern slavery in various organisations, including not-for-profits.

Highlights in this reporting period include:

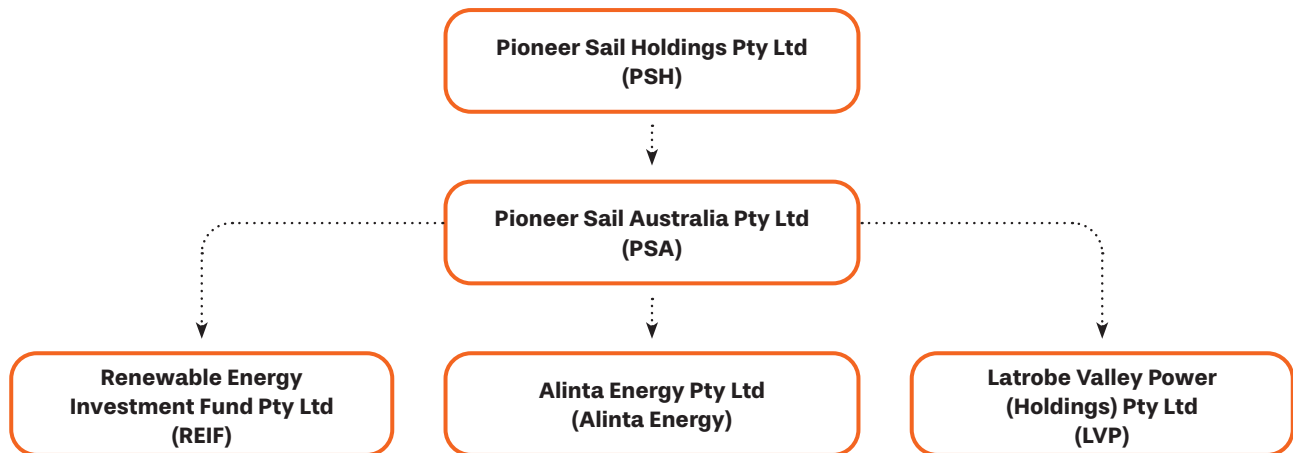
- The acquisition and early deployment of a due diligence and screening software solution to be used to manage Environment, Social and Governance (ESG) risks including modern slavery (called Verimus).
- Preliminary screening of our most frequently used or high spend suppliers in our supplier databases for both Alinta Energy and LVP. In total, over 1,500 existing suppliers were screened.
- We commenced implementation of our first three-year Modern Slavery roadmap.
- The Ethical Sourcing Working Group grew in size to reflect a high level of interest and integration across the business. The group met several times throughout the year to discuss our businesses' approaches to ESG management.
- Through our active participation in the Clean Energy Council's Risks of Modern Slavery Working Group, work has commenced on a collaborative Code of Practice on modern slavery for the renewable energy sector. This work has been led by the NSW Anti-slavery Commissioner, and is expected to be finalised in late 2025 or early 2026.

We welcome feedback or questions about this report, which can be sent to **modernslavery@alintaenergy.com.au**.

ABOUT THE REPORTING ENTITIES

Pioneer Sail Holdings and Pioneer Sail Australia

Pioneer Sail Holdings Pty Ltd (**PSH**) is the Australian holding company of Pioneer Sail Australia Pty Ltd (**PSA**), Alinta Energy, Latrobe Valley Power (**LVP**) and Renewable Energy Investment Fund Pty Ltd (**REIF**). REIF is not itself a 'reporting entity' as defined in the Act. The image below shows the corporate structure and the relationship of the Reporting Entities.



Each of the Reporting Entities is an Australian incorporated, private company with a registered head office in Sydney, Australia. Alinta Energy, LVP, PSA and PSH are separate legal entities and have separate boards. Alinta Energy and LVP boards are each chaired by independent non-executive directors. Matters relating to modern slavery are reported to the boards of each of the Reporting Entities.

The above are collectively referred to as the Reporting Entities. References to "our" or "we" throughout this Statement, refer to the Reporting Entities collectively. As the Reporting Entities each have their own Boards, processes and policies, and differ in the types of activities performed, there may be instances where specific differentiation between the Reporting Entities is required in this Statement. Where specific differentiation is required, reference is made to the reporting entity (or its supply chains and operations) by name.

PSH invests in Alinta Energy, LVP and REIF, through PSA. As Alinta Energy performs management activities for REIF associated with the Yandin wind farm, we have included the operation of this facility in this Statement.

Since neither PSH nor PSA have any employees or direct supply chains, this Statement does not contain specific references to PSH's and PSA's initiatives in relation to modern slavery. From a practical perspective, Alinta Energy and LVP perform activities necessary for the operations of PSH and PSA, and references to the initiatives of Alinta Energy and LVP should be taken as indirectly extending to PSH and PSA. Similarly, the supply chains of Alinta Energy and LVP also relate to PSH and PSA. Staff at Alinta Energy and LVP consulted regularly on modern slavery issues throughout the reporting period.

Further details on the specific structure, operations and supply chain of Alinta Energy and LVP are provided below. Alinta Energy and LVP employ staff to support each of their respective activities.

Alinta Energy

Alinta Energy is a privately owned company incorporated in Australia, with its headquarters in Sydney and offices in Melbourne, Perth, and Adelaide, as well as a Customer Experience Hub located in Morwell, Victoria. It's subsidiaries, unit trusts, and joint ventures are all engaged in the energy sector.

Alinta Energy provides retail electricity and gas services and operates electricity generation, storage, and transmission assets across mainland Australia, along with one power station in New Zealand.

With over 20 years of experience supplying energy in Australia, Alinta Energy serves approximately 1.1 million customers and employs more than 1,200 people.

Alinta Energy's core business activities include:

- **Electricity Generation** – Own, operate, develop, and invest in electricity generation assets, including power stations, wind farms, and solar farms. These assets are either owned by Alinta Energy or their output is secured through power purchase agreements (PPAs) with third parties.
- **Energy Storage** – Constructing a 100MW battery adjacent to our Wagerup Power Station in Western Australia and are exploring additional storage opportunities, including other battery projects and a pumped hydro project at Oven Mountain in New South Wales.
- **Distribution** – Own infrastructure such as gas pipelines.
- **Energy Retail** – Supply electricity and gas to a wide range of customers, including households, small businesses, and large commercial and industrial clients.

Alinta Energy generates and/or retails electricity in New South Wales, Victoria, Queensland, South Australia, and Western Australia's South-West Interconnected System (SWIS, including Perth), and participates in all major mainland Australian wholesale electricity markets. In New Zealand, it owns and operates a generation facility located within the NZ Steel site in Glenbrook. It also retails gas in New South Wales, Victoria, Queensland, South Australia, and Western Australia, and owns gas transmission pipelines in Queensland. Further details are illustrated in the diagram on the following page and can be found in Alinta Energy's annual Sustainability Report available on its website.

Additionally, Alinta Energy is involved in two joint ventures, where it actively works to address modern slavery risks—though none have been directly identified to date. These are:

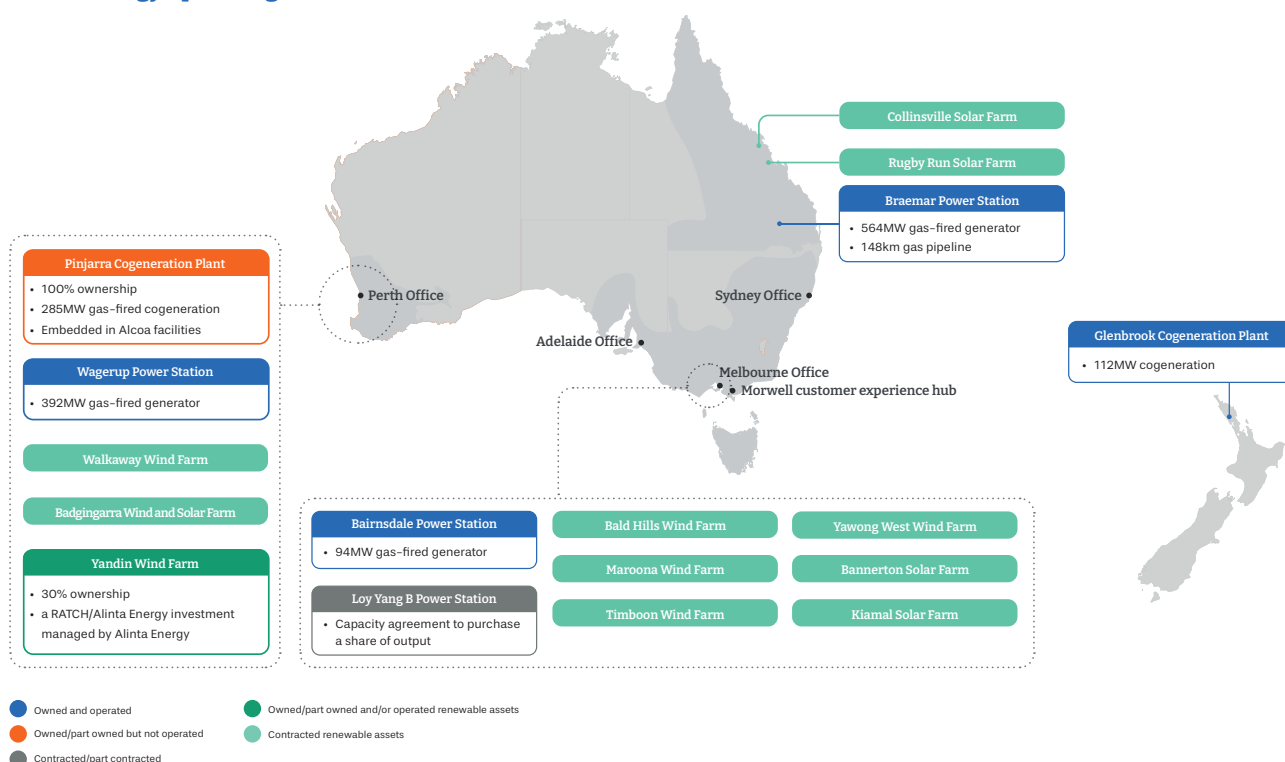
- Yandin Wind Farm – Located in Dandaragan, 175 km north of Perth. This is a joint investment between RATCH-Australia Corporation Pty Ltd and PSA (via REIF, which holds a 30% non-controlling interest). Alinta Energy manages the project, including operations, maintenance, procurement, and other professional services. The supply chain includes both domestic and international suppliers, with key equipment and expertise sourced from Asia and Europe, while most labour is sourced locally in Australia. As Alinta Energy's procurement systems are used, spending related to this joint venture is included in our risk identification and due diligence processes.
- A 50/50 joint venture with CS Energy Ltd – which supplies electricity and gas to customers in the Energex Distribution Area in south-east Queensland. Queensland Government-owned CS Energy Ltd provides the energy and Alinta Energy manages the retail operations.

Alinta Energy no longer has assets in the Pilbara region of Western Australia.

This Statement also includes Alinta Energy's procurement activities that are relevant to the Pinjarra power station, which is owned by Alinta Energy but operated by Alcoa of Australia (Alcoa).

A list of all companies which are subsidiaries of those named above is included in Appendix 1.

Alinta Energy operating assets, assets under construction and offices



Alinta Energy's values are:



Safety



**People
Matter**



Customer Focus



**One
Alinta**



**Commercial
Leadership**



**Respect &
Integrity**

Reducing the risk of modern slavery in Alinta Energy's supply chains aligns strongly with its values, particularly Safety, People Matter and Respect & Integrity.

Alinta Energy procures goods and services from almost 3,000 active direct suppliers and is currently focussed on high spend suppliers. It is not currently focussed on credit card purchases (which are typically low spend amounts) and intends to analyse this better in future reporting periods.

Of the direct (Tier 1) suppliers in Alinta Energy's procurement system, 96% are located in Australia. The remaining Tier 1 suppliers are predominantly in countries with relatively low risk of modern slavery, including (in order of number of suppliers) USA, UK, Singapore, New Zealand, Netherlands and Denmark. All other suppliers make up 0.11% or less of the supplier database.

Key goods and services that Alinta Energy procures include:

- Purchase of equipment to construct new renewable energy generation and energy storage facilities;
- Gas and electricity purchases;
- Gas and electricity transport;
- Financial services;
- Professional services;
- Maintenance, repairs and overhauls;
- Construction materials, products and services;
- Sales and marketing services;
- Information technology services and hardware;
- Facilities services; and
- Consumables including office supplies and staff uniforms.

Latrobe Valley Power

Latrobe Valley Power (LVP) is a privately held company incorporated in Australia, with its registered office located in Sydney. All operations of LVP and its subsidiaries are focused on the energy sector. LVP owns and operates the Loy Yang B Power Station, a brown coal-fired facility situated in Victoria's Latrobe Valley, 160 km east of Melbourne.

The power station comprises two generating units that together deliver up to 1,200 MW of baseload electricity, supplying roughly 20% of Victoria's energy demand. In operation since 1993, Loy Yang B remains one of the most cost-effective and reliable generators in the National Electricity Market. It sources coal from an adjacent mine under a long-term supply contract.

LVP has a capacity agreement with Alinta Energy, providing it with a portion of the station's output. The Loy Yang B Power Station is managed locally, including a procurement team that oversees its supply chain. Most procurement is handled through a subsidiary, LYB Operations & Maintenance Pty Ltd.

While LVP maintains an international supply chain, it makes every effort to source goods and services domestically, with a strong preference for suppliers in the Latrobe Valley region. Key supply chain inputs include:

- Coal used at the Loy Yang B Power Station; and
- Goods and services essential to the station's operation and maintenance.



HOW WE UNDERSTAND OUR MODERN SLAVERY RISKS

Our transition from fossil fuels to renewable energy introduces us to new supply chains and the modern slavery risks they may carry. As we engage with these emerging supply networks, we are committed to deepening our understanding and strengthening our risk management and due diligence processes.

Identifying all modern slavery risks across our diverse operations remains a challenge. Globalisation has created more intricate and expansive supply chains, within the supply networks or in areas with limited cooperative monitoring and where suppliers may lack publicly available information on their modern slavery practices (reflective of a still-developing corporate awareness).

We recognise that the highest risks in our supply chains—particularly for goods rather than services—often lie beyond our Tier 1 suppliers. These risks are typically found at the stages of raw material extraction, component manufacturing, and product assembly. Our focus during this year was on gaining a deep understanding of our Tier 1 suppliers as a first step to mapping our supply chains beyond Tier 1.

This year, we made significant improvements to our systems for accessing information on supplier risks when we began using our new modern slavery compliance portal, called Verimus ClearESG (hereafter Verimus, or 'the portal'). This is an Australian-developed, end-to-end Environment, Social and Governance (ESG) technology solution designed to help businesses comply with both local and international ESG regulations. It integrates legal insights, developed in partnership with an Australian law firm, with regulatory compliance tools and access to global databases. It is highly configurable and can be integrated with other internal systems and tools, allowing us to streamline our due diligence on suppliers, with automated risk scores as a supplier moves through our due diligence framework and an overarching risk score. Further, by taking a deeper dive into our supply chains with supply chain mapping, it provides deeper insights of our supply chains. Suppliers who are identified for deeper dive due diligence and remediation are tracked through the portal, with automated reminder functionality and risk tracking. The tool was developed to assist with compliance of the Modern Slavery Act 2018 and supports supply chain mapping.

The portal allows us to conduct and track due diligence that we undertake on suppliers. Our due diligence efforts have included:

- Undertaking risk screenings on suppliers through a third party database, LSEG (see following page for more detail), which automatically screens suppliers for ESG risk;
- Enhancing and streamlining our supplier self-assessment questionnaire and issuing questionnaires to all high-risk suppliers (with others to follow in the next reporting period);
- Tracking supplier completions of these questionnaires;
- Tracking of broader non-compliances identified in our supplier due diligence;
- Tracking any changes in the risk profile of suppliers over each reporting period;
- Streamlining our supplier management; and
- Receiving regular reports from the portal about supplier due diligence undertaken.

Other ways we gather information about supply chain risks include:

Harnessing expert insights – we used a specialist consultant to review our modern slavery practices and refine our three-year roadmap to better prioritise our actions. We have acquired due diligence software, the Verimus platform and refined our implementation of the tool. Additionally, we refer to external guidance from the NSW Anti-slavery Commissioner, in particular, his Guidance on Reasonable Steps. We continue to speak regularly with other experts in this field to seek advice and insights.

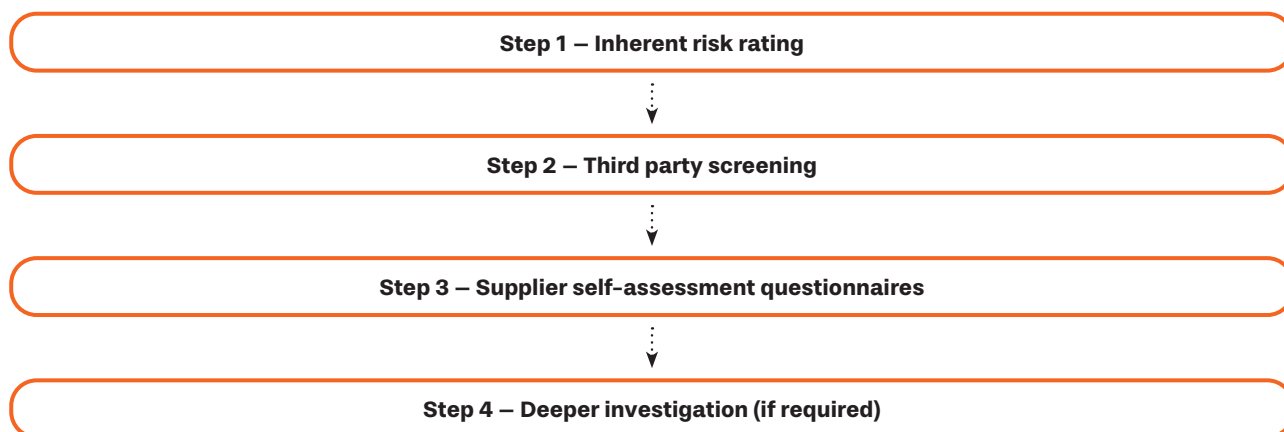
Supplier screening – as discussed above, this capability is now significantly enhanced and can be used for all suppliers in our databases.

Supplier engagement – our suppliers are a key source of insights about modern slavery risks and mitigation measures within our supply chains. Until this reporting period, we had used our supplier self-assessment questionnaire only for new suppliers but have started to progressively send it to existing suppliers, starting with those identified as high-risk. The results are now stored with other due diligence information collected about each supplier in our portal. Historical data from the original questionnaire will be migrated to our new portal to provide a holistic risk profile of all suppliers. LVP continues to use its original self-assessment questionnaire for all tenders and contracts, new suppliers, or reactivations of old suppliers, but will be reviewing the process in the next reporting period, building on the lessons learnt by Alinta Energy.

Peer engagement – we continue to discuss approaches with our peers and industry colleagues across the sector, most notably through the Clean Energy Council's Risks of Modern Slavery Working Group. Our Sustainability Manager attended the NSW Anti-slavery Commissioner's Anti-slavery Forum in May 2024 and presented on modern slavery at the Clean Energy Council's Large-scale Solar and Storage Summit in June 2024.

Improving how we conduct due diligence for suppliers

Our due diligence process helps assess risks in our supply chains. This process is used when onboarding new suppliers, updating data on existing suppliers, and during early tender stages. It involves four steps, as shown below:



These four steps are described further below.

The objective of this process is to provide the relevant procurement decision-makers with information on modern slavery and other risks to allow them to conduct risk assessments and cost benefit analyses. As procurement processes vary in terms of value, and level of risk, each process must be considered individually.

Step 1 – Inherent risk rating

Once a supplier's details are entered into Verimus, an inherent risk rating is calculated which factors in information such as the industry type and geographic location. This risk rating can be amended as the following steps are progressed and will automatically update as new relevant information is added to Verimus.

Step 2 – Third Party Screening

LSEG (formerly Refinitiv) is one of the world's largest suppliers of financial markets data. In 2024, we started using LSEG to screen suppliers across a broad range of risk areas, including ESG. LSEG screenings leverage a database of 60 risk areas including integrity risks, environmental, social and governance risks, data and cyber risks, operational and quality risks, identity risks and financial risks.

Screenings of Alinta Energy suppliers and LVP suppliers have identified broad risks of varying levels in some suppliers. This information forms part of the risk profile analysis of each supplier.

Having completed the first round of screening at the end of this reporting period, we will continue exploration of any matters requiring further consideration in the next reporting period as part of our ongoing due diligence program.

Stage 3 – Supplier self-assessment questionnaires

Supplier self-assessment questionnaires are an important way of engaging with our suppliers to better understand their risks and controls.

In this reporting period, we piloted the use of our enhanced supplier self-assessment questionnaire with select suppliers.

Stage 4 – Deeper investigation (when required)

In circumstances where matters were identified that require further consideration, various avenues are available for gathering additional information, including additional higher level screening reports, deeper engagement with suppliers (such as interviews), analysis of publicly available Modern Slavery Statements and/or third party audits.

PROTECTING OUR CALL CENTRE OPERATORS IN HIGH-RISK COUNTRIES

Alinta Energy operates two Australian-based call centres, in Morwell (Victoria) and Perth (Western Australia), complemented by off-shore call centre services for customer support and back office operations.

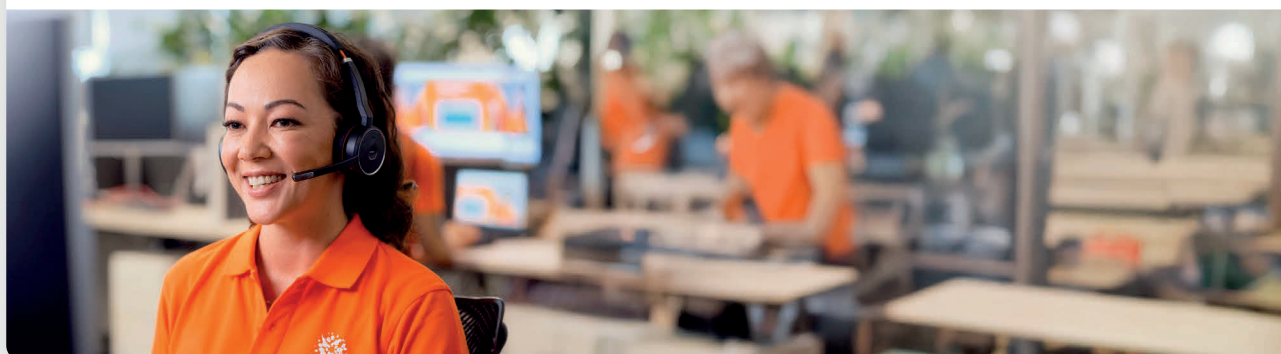
For many years, we have used a contracted call centre in the Philippines. During 2024, we completed a Request for Proposal to optimise and elevate our outsourced service arrangements. The RFP documentation included numerous requirements relating to modern slavery, including that the supplier:

- has conducted reasonable due diligence into its supply chains and operations.
- has taken, and is taking, reasonable steps to identify, assess, address and mitigate risks of modern slavery in its supply chains and operations.
- agrees to comply with our Supplier Code of Conduct.
- will permit Alinta Energy or its representatives to undertake verification activities to validate compliance.
- accepts that if it does not remedy, or provide a plan to remedy identified instances of modern slavery, that Alinta Energy reserves the right to terminate the Agreement.
- will include similar requirements in any subcontracts relating to this contract.

We shortlisted four international organisations to provide these services and conducted an exhaustive evaluation process, involving physical visits to centres in the Philippines and India by senior staff from our Retail unit.

The contract was awarded to an organisation which will provide services to us from both the Philippines and India. The procurement team were impressed with the working environments they witnessed and the excellent tenure records. As part of the contract, there are contractual incentives to maintain or beat these tenure levels. Finally, the procurement team were also impressed with the successful supplier's strong commitment to philanthropic ventures.

Regular ongoing site visits to the call centres and offices in both countries will continue to be conducted by senior Alinta Energy employees to support an ongoing high standard of service to our customers and reduce the risks of people's rights not being met.



KEY MODERN SLAVERY RISKS FOR THE REPORTING ENTITIES

We recognise that the risk of modern slavery is embedded within the supply chains associated with power infrastructure construction and the broader range of activities we undertake.

We are aware that four key factors contribute to elevated risk:

- **Vulnerable populations** – including groups such as migrants and individuals in low-skilled roles.
- **High-risk business models** – such as those involving short-term or temporary employment, labour hire arrangements, outsourcing, franchising, seasonal work and aggressive pricing strategies.
- **High-risk procurement categories** – including service-based procurement, goods not for resale and raw materials
- **High-risk geographies** – particularly in regions affected by conflict, weak rule of law, corruption, displacement or where there is a lack of state protection for human rights.

While we understand these risk factors in principle, assessing them in practice remains challenging due to the complexity and lack of transparency in global supply chains. Our ability to obtain reliable and verified information about suppliers—especially those several tiers removed—continues to be limited.

From research, we know that our highest risk supply chains are likely to be the following:

Alinta Energy	Latrobe Valley Power
<ul style="list-style-type: none">• Electrical equipment• Construction and engineering• Textiles and apparel	<ul style="list-style-type: none">• Electrical equipment• Construction and engineering• Household durables

For Alinta Energy's very small number of Tier 1 suppliers located overseas, identified countries of highest risk are Vietnam, Malaysia, India and Hong Kong. However, these suppliers each represented negligible spend. While spend does not correlate with the risk of a supplier, it does impact on the influence we have over them.

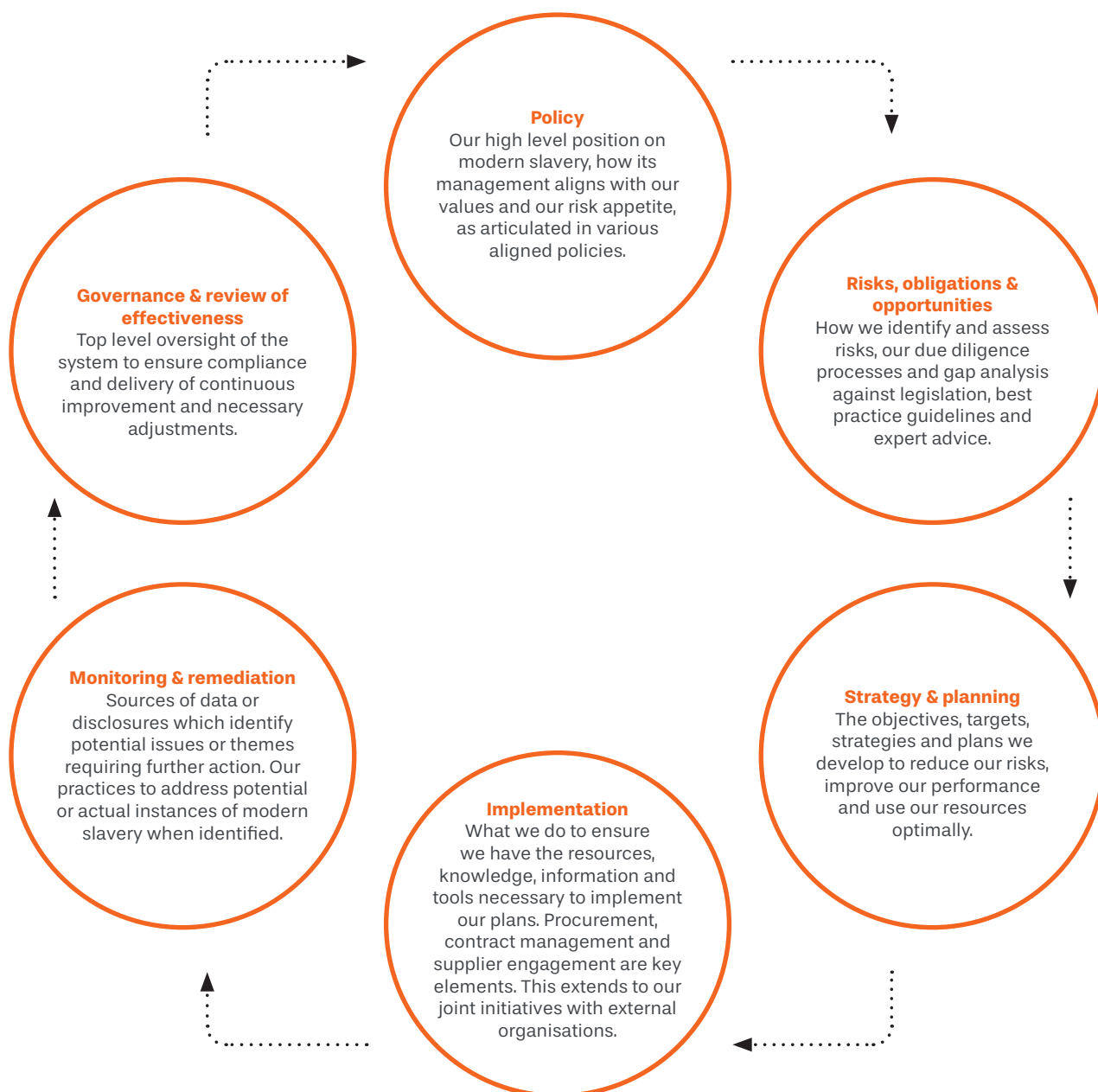
A small number of LVP's Tier 1 suppliers were in the USA, Canada and UK. Although still fairly low risk, the USA and UK is higher risk than Australia. No Tier 1 suppliers were rated overall as very high risk.

Other goods and services we procure beyond those discussed above that present higher risks of modern slavery include:

- Labour hire
- Raw materials extraction for renewable energy components
- Personal protective equipment
- Hospitality
- Cleaning and other property services such as maintenance and security
- International shipping
- Food and agriculture – although this is a relatively minimal expenditure.

MANAGING OUR MODERN SLAVERY RISKS

We apply a systemic approach to managing identified modern slavery risks. The framework we use—outlined below—is based on the structure of management system standards like ISO 14001 but adapted to reflect modern slavery-specific concepts. In this section, we outline how each component of the framework has been strengthened during the reporting period.



Policy

For Alinta Energy, relevant policies and other key documentation include our

- Code of Conduct
- Supplier Code of Conduct
- Procurement Policy and Standard
- Whistleblower Protection Policy
- Anti-Bribery and Corruption Policy
- Risk Management Policy
- Safety Health and Wellbeing Policy
- Treating our People Fairly Policy
- Performance and Misconduct Policy

For Latrobe Valley Power, they include:

- LVP Employee Information Manual
- Purchasing Policy
- Procurement Policy
- Whistleblower Policy
- Enterprise Risk Management Procedure
- Health and Wellbeing Policy
- Supplier Code of Conduct.

Risks, obligations and opportunities

In this reporting period, we gained new insights about our supply chain risks from our new due diligence portal and screenings, which includes screening and risk assessment capability. This is described in Section 3.

There were no legislative changes which impacted our operations relating to modern slavery during 2024, although we are anticipating further consultation by the Commonwealth Government relating to the McMillan Review of the Modern Slavery Act 2018 in future reporting periods.

As mentioned previously, no issues relating to modern slavery in any of our businesses were raised via the Whistleblower hotline.

Strategy and planning

We have a three-year roadmap 2024–2026 and developed a more detailed Action Plan for 2024. The Ethical Sourcing Working Group receives status updates against the Action Plan at each meeting.

Implementation

Resources, responsibilities and accountabilities

The Sustainability Manager at Alinta Energy is responsible for preparing the annual Modern Slavery Statement, coordinating modern slavery risk management efforts across both Alinta Energy and LVP, and addressing any related concerns or inquiries. Adequate time is allocated to this role to ensure meaningful progress, supported by a dedicated budget that allows for additional assistance from consultants or external providers when needed.

Procurement Managers at Alinta Energy and LVP oversee the Procurement Policies and Supplier Codes of Conduct. At Alinta Energy, procurement is more decentralised, with individual buyers responsible for conducting due diligence—particularly for major procurements such as large-scale projects—where tenderers are asked to disclose their modern slavery practices for high-risk categories.

Ultimate accountability for compliance with modern slavery legislation and internal commitments rests with the Executive Leadership Teams and the Boards of the Reporting Entities.

Consultation and communication

Internal consultation primarily occurs through our Ethical Sourcing Working Group, which includes representatives from both Alinta Energy and LVP. Members of the group regularly engage with their peers across the reporting entities to discuss practices and initiatives.

To promote transparency and accountability, we actively invite feedback from interested stakeholders, including external parties. Our annual Modern Slavery Statement encourages stakeholders to share their views, and we provide contact details for this purpose. We use a generic modern slavery inbox to ensure all feedback is captured in one location and provides a repository of information regardless of staffing changes. We note that very little feedback has been received through this channel to date.

Employee training

All employees at Alinta Energy and LVP complete induction training that includes content on modern slavery. In addition, Alinta Energy staff undertake refresher training every two years.

For several years, we have also delivered more targeted modern slavery awareness training to key personnel at both Alinta Energy and LVP. This year, we held a one-hour refresher session featuring external experts. Invitations were extended to all staff involved in procurement or contract management, including financial decision-makers and members of the executive team. Over 170 of the approximately 200 invitees attended—an excellent participation rate. The session was recorded for those unable to attend live.

Shortly following the training, we were asked to provide screening for a major tender, which demonstrated that our training had been effective in raising awareness of the risks and available tools. This work carried over into the next reporting period and will be discussed in our next Modern Slavery Statement.

We have developed a training plan for the 2025 reporting period that will offer more tailored content for different employee groups and the Board. For example, the training needs of our People and Culture team—particularly around labour hire risks and labour violations more broadly, a risk identified for some of our suppliers—differ from those of engineers conducting overseas factory visits and identifying potential red flags. We will provide further updates on this in next year's report.

Documentation

Modern slavery management requirements are documented in a range of locations such as the policies and standards described earlier in this section. Our new due diligence software is helping us to collect relevant documentation in one location, which is particularly helpful to track follow up responses relating to supplier investigations.

Our annual Modern Slavery Statement is also a key document.

Procurement and contract management

Alinta Energy has a decentralised procurement process. Responsibility for identifying and mitigating modern slavery risks associated with suppliers is the responsibility of the individual conducting the procurement process, whether they are the Procurement Manager, project staff, or business operations staff. The Sustainability Manager provides advice or further research about modern slavery issues upon request.

LVP has a centralised procurement process and the day-to-day responsibilities for modern slavery compliance at LVP sit with the LVP Procurement Manager.

During the reporting period, Alinta Energy revised its template procurement contract clauses relating to modern slavery risks to ensure that they appropriately allocate risk and provide appropriate remediation, audit and termination options. The contract clauses are modelled on the contract clauses shared by the NSW Office of the Anti-slavery Commissioner and have been used in new procurement contracts and purchase orders across Alinta Energy commencing in 2025.

Supplier engagement

The Supplier Code of Conduct of Alinta Energy and LVP both require suppliers to address modern slavery risks and implement a grievance mechanism for interested parties to raise modern slavery issues. These Codes of Conduct are publicly available on our respective websites.

The implementation of our new due diligence software has streamlined the process of reviewing risk across our large number of suppliers. This gives us a firm basis to assess which suppliers to follow up with and indicates red flags we should focus upon.

The initial screening using LSEG data is used to create an initial risk assessment, which is then reviewed and updated as necessary once we obtain the results from the supplier self-assessment questionnaire. The portal also becomes a repository of information to capture the history of our engagement with each supplier.

The enhancement of our supplier self-assessment questionnaire template, to feature cascading questions which are only asked if relevant risks are identified from earlier answers. This makes the process of completing these much quicker and easier for small enterprises and businesses in low-risk sectors. We continue to explore opportunities to capture this information at an industry level, to further reduce the administrative burden on suppliers, but so far have not identified an appropriate solution.

Monitoring and remediation

We gather information which allows us to improve our effectiveness through several approaches, described further below.

Monitoring of disclosures and allegations

Issues relating to modern slavery may be raised through channels including our independent whistleblower reporting hotline; our modern slavery inbox (used across PSH operations) and feedback from other sources including employee or supplier disclosures. No issues of significance were raised through any of these mechanisms during the reporting period. Our modern slavery inbox is mostly used to capture correspondence relating to the questionnaires (eg requests for clarification) or with government agencies (such as about our reporting).

We acknowledge that the absence of reports does not mean that modern slavery does not exist in our supply chain, and that we must continue to invest effort in promoting and communicating these and other reporting mechanisms.

Corrective/Preventive Action Requests and Remediation

We use a register within our Enterprise Compliance Management Framework to record any corrective or preventive action requests related to modern slavery, along with other risk areas. This system supports governance by ensuring that identified issues are addressed promptly and helps us detect recurring themes or trends.

Although no instances of modern slavery have been reported in our supply chains to date, we have developed a remediation process, detailed on the following page. While this process has not yet been activated, it has been clearly defined to ensure that any modern slavery concerns can be identified and resolved efficiently and effectively. We acknowledge that the current process is high-level and will require further development to be fully effective in addressing a modern slavery incident. In the following reporting period, we will continue to work with the provider of our new due diligence portal to enhance our processes to respond to any incidents.

▼ **Incident is identified**

- Whistleblower reporting hotline
- Employee and supplier awareness
- Modern slavery inbox

▼ **Gather information**

- Sustainability Manager to investigate and validate details of incident

▼ **Report it**

- Incident reported to the relevant manager, Director, CEO and/or authorities

▼ **Assess our involvement**

- Verify if our actions caused, contributed or have been linked to the harm

▼ **Engage with workers/suppliers and prepare a remediation plan**

- Mitigate risks to victims as a priority

▼ **Execute remediation plan**

- Consider supplier training, on-boarding support, changes to scope of work, timeframes and costs
- Contractual termination is a last resort

▼ **Audit or verify**

- Verify whether remediation has occurred

▼ **Report**

- To Board
- To industry – look for opportunities to share learnings among industry in an anonymous and sensitive way

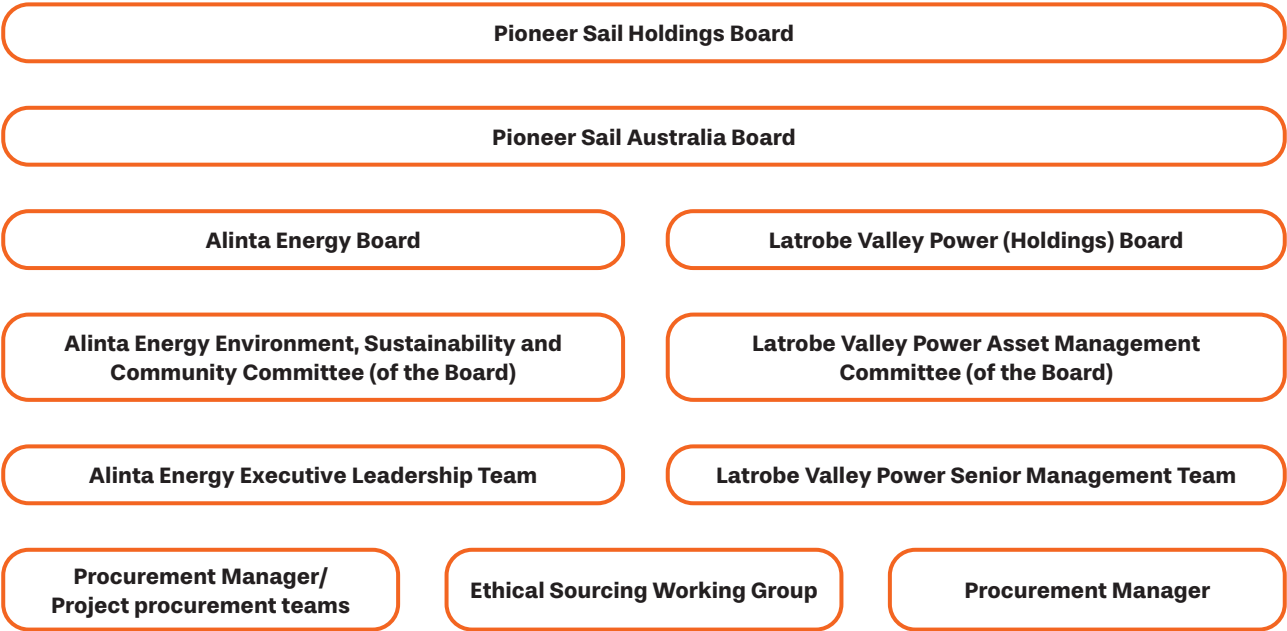
Audits

To date, we have focused on building foundational work and processing the information provided to us by several consultants. We understand that moving towards conducting audits is critical to developing a deeper understanding of the practices of key suppliers. We have therefore engaged with peers to understand which organisations might be best placed to provide audit support, with a view to conducting audits in future reporting periods.

Governance and measuring effectiveness

The final component of our continuous improvement cycle is governance and effectiveness measurement, which includes a top-down review conducted by senior management. This review aims to assess how well our system is performing in mitigating modern slavery risks across our supply chains and to confirm that we are making ongoing improvements.

The governance structure overseeing management of modern slavery risks is shown below:



The 2024 year was focussed on implementing new tools and processes. Accordingly, we deferred the process of measuring effectiveness to take place in the following reporting period, when systems have been embedded for a sufficient time.

We use the weekly meetings with our due diligence platform supplier to review modern slavery risks, develop plans for action and tailor workflows to enhance collaboration with the relevant personnel.

No significant issues were raised with either Board or their subcommittees during the year.

TRACKING PROGRESS AND FUTURE COMMITMENTS

The table below provides a summary of our progress towards achieving the commitments outlined in our previous Statement.

Element	Commitments	Progress in reporting period
Risks, obligations and opportunities	Finalise procurement of, and implement, the due diligence software, including screening and risk assessments of a selection of suppliers based on risk and agreement on a procurement workflow.	Complete. Implementation and enhancements remain ongoing.
	Improve the supplier self-assessment questionnaire process using the new software.	Complete. The enhanced questionnaire was piloted in late 2024 on our high-risk suppliers, and then rolled out for all new suppliers, and phased for existing suppliers, commencing in 2025.
	Implement any requirements arising from amendments to the Modern Slavery Act 2018 (Cth).	Not required. The Commonwealth Government responded to the review of the Modern Slavery Act 2018 (the McMillan Review) in late 2024, but none of the responses impact on our operations. We anticipate further consultation commencing in 2025..
	Continue to support the Clean Energy Council's Risks of Modern Slavery Working Group, and particularly its work with the NSW Anti-Slavery Commissioner to develop a new Code of Practice for the renewable energy sector.	Ongoing. The Code of Practice is anticipated to be released in late 2025 or 2026.
	Enhance the functionality of the whistleblower hotline.	In 2024 we implemented our new due diligence portal and enhanced our due diligence framework. As part of this framework, we identified the ability to more efficiently disseminate resources and tools to third parties. In 2025 this will allow us to more widely provide resources to suppliers about our whistleblowing hotline. We will also track reporting rates and effectiveness as to such enhancements.
Strategy and planning	Develop a clear strategy to gradually enhance due diligence measures for suppliers to effectively identify and mitigate modern slavery risks over time.	Complete, but ongoing refinements will be implemented as the system matures.
Implementation	Review and enhance accountability measures for modern slavery across the entire organisation.	Due to the significant initiative of implementing a new due diligence portal, it was identified to delay this commitment. With the implementation of the due diligence portal, it will allow us a period to track and integrate workflows and then build in such accountability measures against the new framework.
	Commence implementation of three-year roadmap.	Complete.
	Adopt as appropriate elements of the Guidance on Reasonable Steps from the NSW Anti-Slavery Commissioner, including model tender and contract clauses.	Ongoing. We commissioned a review of our template procurement contract clauses. This was completed by Allens in late 2024 and will be inserted into new contracts from early 2025.
	Ensure the modern slavery model clauses are incorporated into new contracts for high-risk suppliers.	
	Develop a modern slavery training plan identifying skills needs, including for induction training, and implement.	Complete. This will be implemented in 2025. The plan will provide greater skill specialisation relating to different business unit needs as well as our Board members.
	Update our websites to share relevant resources, including modern slavery training, with suppliers.	The due diligence portal will allow us to readily share resources, including modern slavery training with our suppliers. The portal will automatically issue training to suppliers including bespoke communications and track the communications. This process has commenced.
	Provide additional guidance to suppliers on modern slavery expectations and resources on the Alinta Energy and LVP websites.	
	Finalise reclassification of supplier data for LVP.	Complete. A new onboarding tool enables LVP to classify suppliers.

Implementation	Finalise reclassification of supplier data for LVP.	Complete. A new onboarding tool enables LVP to classify suppliers.
	Develop a comprehensive manual outlining our modern slavery management system.	A user guide which fulfils this function is contained within the platform. Over time, it will be supplemented by corresponding procedures such as relating to managing risk or counter screening suppliers.
	Revise the Alinta Energy Supplier Self-Assessment Questionnaire to better identify low-risk suppliers and clarify any questions causing confusion.	Complete. The questionnaire will continue to be enhanced as supplier feedback is obtained.
	Add an industry categorisation field to the Maximo system used by LVP for procurement and maintenance data by LVP to facilitate periodic supplier risk assessments.	Complete. This data was migrated to a different system with this functionality.
	Initiate a process of gathering information from longstanding suppliers, beginning with those in the highest risk industries.	Complete. Will be ongoing.
Monitoring and remediation	Explore ways to better promote disclosure and remediation mechanisms, particularly to higher tier suppliers.	As identified above, with the implementation of our new due diligence portal in 2024, along with more widely disseminating our whistleblower hotline, we will also highlight alternative grievance mechanisms as well as have the ability to track remediation mechanisms.
	Conduct supplier audits with the type and number to be based on risk.	<p>Along with the rollout of our new due diligence portal, it was identified that as part of our due diligence framework, audits will play an important role. In order to commence this process, it has been a priority to gain a deeper understanding of the risk profiles of our tier 1 suppliers. This included inherent risk assessment, screening our suppliers and engaging with our suppliers via our new self-assessment questionnaire.</p> <p>In the reporting period we risk triaged to determine if there as an immediate need to audit any tier 1 suppliers.</p>

In the following reporting period, key areas of focus will include:

Risks, obligations and opportunities

- Focus on clarifying Tier 1 suppliers and certain high risk supply chains for further due diligence.
- Begin mapping Tier 2 suppliers of high-risk Tier 1 suppliers.

Implementation

- Develop and roll out modern slavery training that is tailored to different needs across our businesses.
- Continue to request all high-risk suppliers to complete our supplier self-assessment questionnaire or conduct further desktop research to satisfy ourselves that they have adequate systems and processes in place (eg by reviewing their Modern Slavery Statements where available).

Monitoring and remediation

- Conduct third party audits or desktop reviews for a sample of high-risk Tier 1 or Tier 2 suppliers.

Governance and management review

- Conduct a review of selected systems and processes to identify critical improvement opportunities.

APPENDIX 1

List of all subsidiary organisations under Pioneer Sail Holdings

Entity	A.C.N (unless otherwise indicated)	ABN
Pioneer Sail Holdings Pty Ltd	617 844 569	45 617 844 569
Pioneer Sail Australia Pty Ltd	617 846 385	91 617 846 385
Alinta Energy Pty Ltd	614 975 629	64 614 975 629
Alinta Energy Clean Energy Development Pty Ltd	617 891 728	86 617 891 728
Yandin Wind Farm Pty Ltd	150 810 932	31 150 810 932
Renewable Energy Investment Fund Pty Ltd	624 371 259	85 624 371 259
The Trustee for Renewable Energy Investment Fund Trust	21 661 655 882	
Yandin WF Finance Pty Ltd (30%)	625 788 794	70 625 788 794
Yandin WF Holdings Pty Ltd (30%)	626 751 264	46 626 751 264
The Trustee for Yandin WF Holdings Unit Trust (30%)	37 683 659 291	
Yandin WF Pty Ltd (30%)	626 771 711	91 626 771 711
The Trustee for Yandin WF Unit Trust (30%)	53 131 084 026	
Kentucky WF Holdings Pty Ltd	626 853 352	51 626 853 352
The Trustee for Kentucky WF Holdings Unit Trust	78 310 318 503	
Kentucky WF Pty Ltd	626 853 978	80 626 853 978
The Trustee for Kentucky WF Unit Trust	24 484 400 874	
NSW Energy Cluster Pty Ltd	615 936 000	27 615 936 000
Alinta Holdings Pty Ltd	148 012 471	52 148 012 471
Alinta Energy Nominee (No. 2) Pty Ltd	156 303 123	35 156 303 123
Alinta Energy Power Development Finance Pty Ltd	168 159 831	84 168 159 831
Alinta Energy Finance Pty Ltd	149 229 998	39 149 229 998
CMO Energy NZ	1715983	
Alinta Braemar Pty Ltd 113 384 535	38 113 384 535	
Alinta Braemar 1 Pty Ltd	113 385 470	67 113 385 470
Alinta Braemar 2 Pty Ltd	113 385 667	99 113 385 667
Alinta Braemar 3 Pty Ltd	113 526 944	91 113 526 944
Braemar Power Project Pty Ltd	113 386 600	54 113 386 600
Braemar Power Partners Pty Ltd	113 386 280	67 113 386 280
Alinta Energy Renewables Pty Ltd 606 349 580	85 606 349 580	
Alinta Energy (Queensland CSEJV) Pty Ltd	620 712 996	14 620 712 996
East Coast Renewables Pty Ltd	613 577 861	46 613 577 861
Alinta Energy Retail Sales Pty Ltd	149 658 300	22 149 658 300
Neighbourhood Energy Pty Ltd	109 118 578	97 109 118 578
Alinta Servco Pty Ltd	126 537 362	46 126 537 362
Alinta Energy Development Pty Ltd	151 231 980	85 151 231 980
Alinta Energy (Reeves Plains) Pty Ltd	620 186 076	19 620 186 076
Alinta Energy (New Markets) Pty Ltd	620 186 610	56 620 186 610
Naroghid Wind Farm Pty Ltd	106 134 605	42 106 134 605
Alinta Energy CEA Pty Ltd	154 977 492	77 154 977 492
Alinta Energy CEA Futures Trading Pty Ltd	605 450 208	40 605 450 208
Alinta Energy CEA Trading Pty Ltd	605 450 271	54 605 450 271
Alinta Power Cat Pty Ltd	124 509 619	63 124 509 619
Alinta Power Cat Sub 1 Pty Ltd	126 822 679	78 126 822 679
Alinta Pty Ltd	102 848 055	38 102 848 055
Alinta Sales Pty Ltd	089 531 984	92 089 531 984

Entity	A.C.N (unless otherwise indicated)	ABN
Alinta Co-generation (Pinjarra) Pty Ltd	102 893 309	12 102 893 309
Alinta Co-generation (Wagerup) Pty Ltd	111 280 614	62 111 280 614
Alinta Energy WA Pty Ltd	604 283 623	83 604 283 623
Alinta Power Cat Sub 2 Pty Ltd	126 823 078	85 126 823 078
Alinta APG Pty Ltd	068 827 654	22 068 827 654
Alinta ENZ Ltd (Bermuda)	25975	942430
Alinta Power Cat Sub 4 Pty Ltd	126 822 633	82 126 822 633
Alinta DVP Pty Ltd	083 051 978	98 083 051 978
Alinta DEBH Pty Ltd	075 067 739	79 075 067 739
Alinta DEBP Pty Ltd	075 067 702	85 075 067 702
Alinta DEBO Pty Ltd	079 246 423	66 079 246 423
Alinta Energy Geothermal Pty Ltd (95%)	626 065 432	16 626 065 432
Connect Develop Pty Ltd	168 093 749	62 168 093 749
Spinifex Offshore Wind Farm Pty Ltd (50%)	655 878 989	38 655 878 989
Trustee for the Spinifex OWF Trust (50%)	31 864 100 211	
Spinifex OWF Holdings Pty Ltd (50%)	674 951 029	20 674 951 029
Trustee for the Spinifex OWF Holdings Trust (50%)	24 553 754 575	
Alinta Energy (Cataby) Pty Ltd	657 255 386	19 657 255 386
OMPS Pty Ltd	160 259 174	22 160 259 174
Ovalis Offshore Wind Farm Pty Ltd	672 756 106	63 672 756 106
Renewable Energy Investment Fund (Offshore) Pty Ltd	676 511 854	99 676 511 854
Trustee for the Renewable Energy Investment Fund Offshore Trust	54 871 654 212	
Renewable Energy Investment Fund (Offshore) Holdings Pty Ltd	676 511 407	98 676 511 407
Trustee for the Renewable Energy Investment Fund Offshore Holdings Trust	54 180 714 928	
Marri WF Holdings Pty Ltd	684 687 303	34 684 687 303
Trustee for the Marri WF Holdings Unit Trust	48 648 835 491	
Marri WF Pty Ltd	684 707 551	36 684 707 551
Trustee for the Marri WF Unit Trust	78 658 559 049	
Latrobe Valley Power (Holdings) Pty Ltd	621 363 102	57 621 363 102
Latrobe Valley Power (Operations) Pty Ltd	621 365 035	27 621 365 035
Latrobe Valley Power (Finance) Pty Ltd	621 365 571	49 621 365 571
Gippsland Power Pty Ltd	077 851 079	30 077 851 079
LYB Australia Ltd	055 563 785	87 055 563 785
LYB Operations & Maintenance Pty Ltd	055 563 696	66 055 563 696
LYB Ventures Australia Pty Ltd	055 984 499	57 055 984 499
Latrobe Power Pty. Ltd.	055 983 563	42 055 983 563
Traralgon Power Pty Ltd	056 292 623	64 056 292 623
LVP Perth BV	30117308	068 058 480
Latrobe Power Partnership	Registration number: B21639623 18 324 245 131	
Loy Yang B Joint Venture		
LYB Victoria Partnership		

APPENDIX 2

Requirements of the Modern Slavery Act 2018

Requirement of the Act	Clause	Statement section	Page/s
Approval by principal governing body and signature of a responsible member	s14(2)(d)(i), s16(2)(b)	Board approval	3
Details of the reporting entity	s16(1)(a)	About the Reporting Entities	5-8
Describe each reporting entity's structure, operations and supply chains	s16(1)(b)	About the Reporting Entities	5-8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls	s16(1)(c)	How we understand our modern slavery risks	9-11
		Key modern slavery risks for the reporting entities	12
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	s16(1)(d)	Managing our modern slavery risks	13-18
Describe how the reporting entity assesses the effectiveness of these actions	s16(1)(e)	Tracking our progress and future commitments	19-20
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	s14(2)(c), s16(1)(f)	About the Reporting Entities	5-8
Any other information that the reporting entity, or the entity giving the statement, considers relevant	s16(1)(g)	Introduction	4
		Tracking our progress	19-20

Feedback

We welcome feedback, concerns, questions or suggestions about this report or our approach to managing modern slavery.

Please contact us at **modernslavery@alintaenergy.com.au** for any of the Reporting Entities. All feedback will be treated sensitively.

Reporting incidents of actual or suspected modern slavery

Any allegations may be reported anonymously to our Whistleblower Hotlines which are both operated by Deloitte.

For Alinta Energy the contact details are:

Telephone: (24 hours a day, 7 days per week)
1800 456 493

Email: alintaenergyhotline@deloitte.com.au

Website: alintaenergyhotline.deloitte.com.au
Username: alintaenergy
Password: hotline

Post: Alinta Energy Hotline Reply Paid 12628
A'Beckett Street Victoria 8006

For LVP the contact details are:

Telephone: (6.30am–5.30pm Monday to Friday)
1800 849 229

Email: whistleblower@deloitte.com.au

Website: australia.deloitte-halo.com/LoyYang

Post: Loy Yang B, Reply Paid 12628
A'Beckett Street Victoria 8006

