

## Modern Slavery Statement

This is a Modern Slavery Statement for Zenviron Pty Ltd ACN 612 344 313 (**Zenviron**) for the reporting period 1 July 2021 – 30 June 2022 (Australian Financial Year).

Zenviron has prepared this Modern Slavery Statement on a voluntary basis under Section 6 of the Commonwealth Modern Slavery Act 2018, in accordance with section 13 and 16 of the Act.

### About Our Business

#### Structure

Zenviron is an Australian engineering, procurement, and construction company that delivers large scale renewable energy projects. Zenviron is a company limited by shares incorporated in Australia. Zenviron is headquartered in Newcastle, NSW.

#### Operations

Zenviron's main operations include its Australian construction sites, including the workers it directly employs, from its owners - Monadelphous Group and ZEM Energy, along with the specialist workers it subcontracts. Zenviron also provides ancillary planning, engineering and design services related to large scale renewable energy projects in Australia.

#### Supply Chains

Zenviron's critical supply chains include the manufacture and transportation of products needed for its projects; including transformers, electrical cables, road aggregate, and concrete products. In this context, Zenviron's supply chains include manufacturing facilities within Australia and outside).

Zenviron's supply chains also include service providers, including cleaners, security providers, and other specialist service providers. The supply chain extends to many sub suppliers (i.e. suppliers to our suppliers) which can include inputs such as the mining and refining of minerals and metals used in electrical components we procure.

### Our Policies

Zenviron has a zero tolerance to any form of modern slavery and human trafficking.

Zenviron strictly prohibits human trafficking in all its operations and in those of all subcontractors, suppliers and agents in our supply chain.

Workers are not to be subjected to any form of forced, compulsory, bonded, or indentured labour. All work is voluntary and workers have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.

The workplace is to be free of any form of harsh or inhumane treatment. This extends to the prohibition of disciplinary procedures that result in wage deductions, reductions in benefits, or compulsory labour.

All workers, irrespective of their nationality or legal status, are treated fairly and equally.

When recruitment and hiring is necessary through labour agencies, Zenviron takes steps to ensure that the labour agencies it engages operate legally, hold the necessary licenses, do not charge recruitment fees to the recruited workers, and do not engage in fraudulent recruitment practices that place workers at risk for human trafficking and sexual exploitation.

Workers are made aware of their rights and responsibilities at the time of hire, including the terms and conditions of their employment contract.

## **Supply Chains with a Risk of Modern Slavery**

Zenviron recognises there are parts of its supply chain which may be directly linked to modern slavery through goods and services procured.

Zenviron recognises the insidious nature of modern slavery, and the challenges posed in trying to eradicate the practice given the often complex and international nature of our supply chains. Those are instances where we have very limited ability to influence the production and management practices of the supply chain.

### Geographic risks:

Zenviron procures goods manufactured in countries reported to have some prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations and NGOs.

### Sector and industry risks:

Zenviron procures goods and services from certain sectors and industries that are known to have modern slavery risks because of their characteristics, products, processes, and business models. Such industries include the property and construction sectors, transportation and warehousing, electronics and electrical products manufacturing, and garment manufacturing.

## **Actions Taken to Reduce Modern Slavery Risks**

Zenviron conducts audits to prohibit or remove from its supply chain suppliers from any nation that is considered a high risk of modern slavery (victims per 100 population >1)<sup>1</sup>.

Zenviron continues its commitment to ethical business practices along with practical steps to help eradicate modern slavery, including:

- A commitment to not tolerate any form of modern slavery or human trafficking, through its Anti-Modern Slavery Policy enacted in the 2020-21 reporting year.
- Established a Whistleblower Policy and associated Whistleblower Hotline managed by a 3rd party in early 2022, to report instances of actual or suspected unethical or unlawful conduct.
- Modern slavery training and education program integrated into Zenviron's operations, with support from the Supply Chain Sustainability School's tools and resources.
- Review of modern slavery risks through existing company Risk Management Processes - which identifies, assesses, mitigates and records risk in accordance with AS/NZS ISO 31000 Risk Management.
- Ongoing review and analysis of operations, supply chain and spend, identifying where exposure to modern slavery may exist.
- Incorporation of modern slavery considerations in procurement activities, through a supplier pre-qualification processes, and the development of remediation plans where required.
- Ongoing review and update of Business Management System forms and procedures relating to modern slavery.

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<sup>1</sup> Which at time of writing included: Belarus, Brunei Darussalam, Burundi, Cambodia, Central African Republic, Chad, Congo, Eritrea, Iran, North Korea, Mauritania, Mongolia, Myanmar, Pakistan, Papua New Guinea, Rwanda, Somalia, South Sudan, Sudan, Turkmenistan

- Supporting our customers through their own due diligence reviews in relation to modern slavery risks and acting promptly on any areas of improvement.
- Maintaining a Code of Conduct, which provides our employees with a mechanism to address grievances or potential breaches in a safe and confidential manner.

No changes were made to Zenviron's Modern Slavery framework of due diligence and remediation in 2021/22.

### **Assessing the effectiveness of actions**

Through its onboarding and pre-qualification processes, Zenviron reviews and evaluates the information it receives through self-assessment questionnaires from its suppliers to assess risk and act on any concerns, on an ongoing basis.

In turn, Zenviron's practices are regularly reviewed and scrutinised by our customers and external certification bodies. We act promptly on any opportunities for improvement that are identified.

Zenviron also regularly audits its own procurement and supplier registration practices including modern slavery assessments, through an internal audit program, to ensure compliance and address any deficiencies.

Our internal anti-modern slavery policies and procedures are reviewed systematically along with the participation rate of employee training which is all then reported to senior management.

### **Consultation**

Zenviron does not own or control any reporting entities, nor does it jointly prepare statements under section 14 of the Modern Slavery Act.

This Modern Slavery Statement has been approved by Zenviron Board of Directors.

A handwritten signature in black ink, appearing to read "Perrott".

Nicholas Perrott - Director

**November 2022**