

## Modern Slavery Statement 2023

### Reporting entity

Zenviron Pty Ltd (ABN 87 612 344 313) (“Zenviron”, “the Company”, “we”, “our”, “it”) is an incorporated joint venture between Monadelphous Group Limited (“Monadelphous”) and ZEM Energy Pty Ltd (“ZEM Energy”).

### Purpose and acknowledgement

We recognise that modern slavery is a global issue and that it affects vulnerable individuals and communities around the world. We are committed to ensuring there is no modern slavery or human trafficking in our business or supply chains and maintaining transparency throughout our business and in our approach to handling the issue of modern slavery through our supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2018 (Cth) and Modern Slavery Act 2018 (NSW)

### Our business operations and structure

Zenviron is a Balance of Plant (BoP) contractor that specialise in the design and delivery of largescale renewable energy projects such as wind and solar farms as well as battery storage within Australia. Zenviron is operated from and headquartered in Newcastle, NSW.

#### Operations

Our operations for this reporting period consisted of one construction site in the Southern Tableland of NSW and Head office in Newcastle NSW Australia. Both sites are staffed by workers directly employed from our parent companies – Monadelphous Group and ZEM Energy, in addition to specialist subcontractors. We also provided consultation and engineering services for planning, engineering and design related services to several other large scale renewable energy projects in Australia.

#### Supply Chains

Our critical direct supply chains include the manufacturing and shipping of equipment and products required for our projects. In this reporting period these consisted of high voltage transformers, high, medium and low voltage electrical cables, high voltage power line poles and associated hardware in addition to, road construction material and concrete products. These supply chains involve overseas manufacturing and shipping and processing facilities within Australia.

Extended supply chains include subcontractors and specialist service providers such as specialist consultants and cleaners.

### Our Policies

We have and maintain a zero tolerance to any form of modern slavery and human trafficking.

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

Our employees 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 becomes necessary to fill vacant job positions through the use of labour and recruitment agencies, we take all steps necessary to ensure that the labour agencies we engage 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 of human trafficking and exploitation.

Employees are made aware of their rights and responsibilities at the time of hire, both verbally and in writing by way of the terms and conditions of their employment contract.

## Modern Slavery

Modern Slavery is a serious human rights violation and crime under international law. It refers to many forms including forced labour, debt bondage, human trafficking, and forced marriage. It can occur in any country, industry, and can affect people of all ages, genders and nationalities.

We acknowledge that the risks of modern slavery may be increased in some of our supply chains because of the geographical location of some of these suppliers and the source of materials used in the products supplied to us. We also recognise that we do not have full visibility in certain overseas markets and that this carries added risks of modern slavery especially in the secondary levels of our chain of suppliers and the source of materials used in our goods and services. To manage these risks, we will continue to engage with and monitor our supply chains through our due diligence process, and work in a collaborative way with our suppliers where risks are identified.

## Actions Taken to Reduce Modern Slavery Risks

We conduct audits and risk reviews to identify and prohibit from our supply chain suppliers from any nation that is considered a high risk of modern slavery (victims per 100 population >1)<sup>1</sup>.

We continue our commitment to ethical business practices along with practical steps to help eradicate modern slavery, including:

- 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 risk assessment and considerations in procurement activities, through a supplier pre-qualification process.
- Developing a strategic supplier framework for prequalified suppliers to further reduce the risk of modern slavery.
- Ongoing review and update of Business Management System forms and procedures relating to modern slavery.
- 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 for our employees to report instances of actual or suspected unethical or unlawful conduct without fear of recrimination or reprisals, to the extent permitted by the law. Zenviron is committed to fully investigating all concerns raised, and

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<sup>1</sup> At the time of reporting these countries were: North Korea, Eritrea, Mauritania, Saudi Arabia, Türkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan, Kuwait, Ukraine, North Macedonia, Myanmar, Turkmenistan, Albania, Belarus, Kazakhstan, Pakistan, Azerbaijan, Papua New Guinea, South Sudan, Bosnia and Herzegovina, Jordan.

to rectifying any wrongdoing which may have occurred to the extent practicable in all circumstances, and to the principle of fairness in all investigations.

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

Through our 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, our 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 reported to senior management.

We continue to evaluate the suitability of our modern slavery program by benchmarking our approach against guidance provided by environmental, social, governance (ESG) and human rights advocacy groups and our customers.

### **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 statement is prepared in accordance with Section 13 and 16 of the Modern Slavery Act and constitutes the modern slavery statement of Zenviron Pty Ltd for the year ended 30 June 2023. This statement has been approved by Zenviron Board of Directors.

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

Nicholas Perrott – Director

**November 2023**