

# Modern Slavery Statement

2025

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**EnergyAustralia**  
LIGHT THE WAY

# Australian Modern Slavery Act 2018 reporting criteria

	Page/s
a) <b>Identify the reporting entity</b>	4
b) <b>Describe the structure, operations and supply chains of the reporting entity</b>	4 - 11
c) <b>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls</b>	7 - 8, 9 - 11
d) <b>Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes</b>	7 - 8, 11 - 14
e) <b>Describe how the reporting entity assesses the effectiveness of such actions</b>	15 - 18
f) <b>Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement</b>	19 - 20
g) <b>Include any other information that the reporting entity, or the entity giving the statement, considers relevant</b>	19

## Message from the Managing Director

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We are pleased to publish EnergyAustralia's 2025 Modern Slavery Statement, setting out our commitment to ethical and responsible business operations.

At EnergyAustralia our purpose is to lead and accelerate the clean energy transformation for all. As we move toward a low-carbon future, we recognise that this process will introduce challenges across both local and global supply chains. We are fully committed to upholding human rights and maintain zero tolerance for modern slavery. Adhering to ethical governance practices is essential to EnergyAustralia's ability to provide sustainable value to our employees and the communities where we operate.

Our business and entire supply chain are protected by strict procedures designed to reduce the risks of modern slavery. We regularly review and audit these measures to ensure their effectiveness.

Addressing modern slavery involves working collaboratively with our suppliers along with industry stakeholders, partners and Government, to understand where risks are, and where we need to adapt and evolve.

Modern slavery is difficult to eliminate because it is often concealed and deceptive but fighting it is extremely important. EnergyAustralia is dedicated to acting ethically and transparently, and we aim to keep improving our program.

Sincerely,

*Mark*

Mark Collette

**Managing Director, EnergyAustralia**

# About this Statement

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## Reporting Entity

This Modern Slavery Statement (Statement) is made under the *Modern Slavery Act 2018 (Cth)* (the Act) by EnergyAustralia Holdings Limited (ABN 57 101 876 135) on its own behalf and on behalf of the following controlled subsidiary companies, which meet the reporting entity criteria of the Act:

- EnergyAustralia Pty Ltd (99 086 014 968)
- EnergyAustralia Yallourn Pty Ltd (47 065 325 224)
- EnergyAustralia NSW Pty Ltd (75 163 935 635)
- EnergyAustralia Tallawarra Pty Ltd (69 081 074 142)
- EnergyAustralia Ecogen Pty Ltd (86 086 589 611)
- EnergyAustralia Investments Pty Ltd (27 113 121 592)
- EnergyAustralia AusPower Pty Ltd (83 073 060 054)

As at 31 December 2025, the EnergyAustralia Holdings Limited Group was comprised of 44 controlled subsidiary entities (companies and trusts) and 12 Joint Venture entities (companies and trusts). Together, EnergyAustralia Holdings Limited and its controlled subsidiary entities are referred to as EnergyAustralia. EnergyAustralia Holdings Limited is a wholly owned subsidiary of CLP Holdings Ltd (CLP).

The Boards of EnergyAustralia's reporting subsidiary companies have reviewed this Statement. This Statement has been approved by the Board of EnergyAustralia Holdings Limited on behalf of all reporting entities and it is signed by the Managing Director and Chair. This Statement has been prepared to meet the mandatory reporting criteria set out under the Act.

## About EnergyAustralia

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### Our structure

As one of Australia's largest energy retailer and generators, we have approximately 2.3 million customer accounts, across the eastern seaboard, from Southern Queensland, down to New South Wales, Australian Capital Territory, Victoria and South Australia.

### CLP

EnergyAustralia Holdings Limited is a wholly owned subsidiary of Hong Kong listed CLP Holdings (CLP) and one of Australia's largest integrated energy businesses. CLP was founded in 1901 in Hong

Kong and entered Australia in 2001 by acquiring a majority interest in Yallourn Energy. In 2011, CLP completed the acquisition of energy retailer EnergyAustralia. CLP has a strong focus on governance and ethical business practices.

## Retail

As an energy retailer as well as a generator, we buy and generate electricity and purchase gas on behalf of our customers. We provide billing and account management services for our customers, as well as offer innovative energy products and services behind the meter.

## Generation

As at 31 December 2025, we held around 4,800 MW of electricity generation capacity. In addition, EnergyAustralia had the rights to more than 859 MW of solar and wind farm PPAs and owns 50% of the Cathedral Rocks Wind Farm.

While some PPAs have rolled off in the last 15 months, the capacity in our portfolio will always fluctuate depending on the duration of each agreement; and therefore the activity to secure sufficient capacity to meet our renewables ambition remains ongoing and a core focus.

Our committed generation and storage assets as at 31 December 2025 are outlined in the table below.

Generation and storage assets				
Asset name	Location	Fuel	Registered capacity*	Expected closure date
<b>Yallourn PS</b>	Victoria	Brown Coal	1480 MW	mid-2028
<b>Mt Piper PS</b>	New South Wales	Black Coal	1430 MW	by 2040
<b>Newport</b>	Victoria	Gas	500 MW	2039
<b>Jeeralang</b>	Victoria	Gas	432 MW	2039
<b>Hallett</b>	South Australia	Gas	217 MW	2050
<b>Tallawarra A</b>	New South Wales	Gas	440 MW**	2043
<b>Tallawarra B</b>	New South Wales	Gas	320 MW	2053
<b>Cathedral Rocks</b>	South Australia	Wind	66 MW (50% equity)	2030
<b>Hallett BESS (Stage 1)</b>	South Australia	Battery	50 MW (Agreed Capacity)***	N/A
<b>Wooreen BESS</b>	Victoria	Battery	350 MW (50% equity) (Agreed Capacity)***	N/A

\* Registered capacity can differ from maximum capacity or scheduled capacity for these assets.

\*\* Upgrades continue which will increase the registered capacity.

\*\*\* Hallett BESS and Wooreen BESS are not yet registered at 31 December 2025.

Since the release of our inaugural Climate Transition Action Plan in 2023, we have made significant progress. We have been awarded support for the Wooreen and Hallett battery projects under the Federal Government's Capacity Investment Scheme. We have secured 230 MW of renewable energy through Power Purchase Agreements and commissioned Australia's first peaking power station with direct emissions offset, Tallawarra B. Our plan to close the Yallourn power station in mid-2028 continues to move forward. We have more to do, but we are proud of the recent progress we have been able to achieve and will continue to focus on delivery amid the market challenges.

## Workforce

At EnergyAustralia, we strive to create a future ready environment where our people can be at their best, led by great people leaders. As at 31 December 2025 we employed over 2300 people across our generating sites, head office in Docklands, Victoria, and our Geelong contact centre. We are committed to having a diverse and inclusive workforce, this includes gender, sexual orientation, gender identity, age, disability, marital or family status, ethnicity, nationality, cultural backgrounds, perspectives, and other areas of difference. Women make up almost 40% of our workforce, and women represent 55% of our Executive Leadership Team.

We remain committed to Reconciliation. Earlier this year, we launched our refreshed Innovate Reconciliation Action Plan with a focus on engagement and delivery of co-design programs with First Nations peoples through our new energy projects, employment opportunities and procurement pathways to encourage investment with First Nations businesses. We support parents through our leading parental leave policy; and continue to work to gender equality and inclusion of LGBTQI+ people.

Our EA Way behaviours represent the core of who we are when we are at our best and guide the way we work together to achieve our strategy and aspiration to "lead and accelerate the energy transformation for all". Our EA Way behaviours are Be Purposeful, Be Bold and Move Fast, Make a Difference, and Play More Together.

## Governance

All EnergyAustralia entities operate in accordance with group wide Procurement Policies and Processes including our Modern Slavery policies and processes. EnergyAustralia's Modern Slavery Policy outlines EnergyAustralia's stance on modern slavery and how risks of modern slavery within our operations and supply chain are to be identified, assessed and addressed. Our Modern Slavery Policy is supported by other policies, processes and systems described in this Statement.

The Board of EnergyAustralia Holdings Limited has oversight of our compliance with legal and regulatory matters.

As part of its governance structure, EnergyAustralia has a Board Audit and Risk Committee which functions to review the effectiveness of our risk management systems for both financial and non-

financial risks and internal controls, and the systems and procedures for compliance with applicable legal and regulatory requirements.

The Executive Sustainability Committee supports the Board Sustainability Committee and meets monthly. Sustainability at EnergyAustralia means how we conduct business sustainably encompassing health, safety, employee wellbeing, the environment, climate change and the net zero transition, the community and cultural heritage. Our approach to Modern Slavery is part of this important commitment. The Executive Sustainability Committee is accountable for the performance of the business in relation to Sustainability.

The Executive Sustainability Committee's charter includes reviewing the effectiveness of our programs based on our continuous improvement ambitions, as well as providing recommendations, information, and reports to assist the Board Sustainability Committee fulfil its responsibilities.

In turn, the Board Sustainability Committee assists the Board and management in the oversight and review of EnergyAustralia's objectives to be a sustainable organisation. They will review and monitor key sustainability policies, strategies and programs, including those related to Modern Slavery.

## About our operations

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### i. Overview

EnergyAustralia employs 2369 people all based in Australia. Most of our workforce are engaged directly via employment contracts and/or enterprise agreements on a permanent or maximum term basis. Less than 10 employees are employed on a casual basis. Our employment contracts, enterprise agreements and workplace policies are regularly reviewed to ensure compliance with workplace laws, including the *Fair Work Act 2009 (Cth)* and National Employment Standards.

All forms of modern slavery and related behaviour are forbidden under EnergyAustralia's Code of Conduct, Workplace Behaviour Policy and Modern Slavery Policy. We also have a comprehensive Work Health and Safety (WHS) policy and site-specific WHS procedures regarding working conditions. Our employees and extended workforce undertake mandatory annual training in relation to the Code of Conduct. Policies are reviewed and updated at least every 2 years.

### ii. Risks of modern slavery (in our workforce)

An internal audit focusing on EnergyAustralia's hiring policies and practices was completed in 2022 with no significant risks of modern slavery in our operations identified. Audits are undertaken every 4 years.

We acknowledge that while no current significant risks were found in that assessment, this does not guarantee that instances of modern slavery cannot occur. As such, People and Culture policies and practices are regularly reviewed to ensure compliance.

### iii. Actions taken to address modern slavery risks

EnergyAustralia has several mechanisms in place to capture employee concerns and grievances, including those relating to modern slavery. These are communicated to all employees on commencement as part of induction processes and then regularly to people via the company intranet, direct emails and annual online training and include:

- **Grievance Resolution Guidelines**
- **Whistleblowing program**
- Anonymous **Employee Engagement Survey**
- **Code of Conduct**
- **Integrum** – our Incident Management system to report any health and safety hazards, near misses and incidents as well as employee relations and whistleblower matters (including complaints and grievances).

Registers are maintained to record any allegations or breaches related to policy and compliance by the People and Culture, Group Internal Audit, Legal and Governance and HSSE functions.

### iv. Effectiveness of grievance mechanisms

During 2025, of the mechanisms we have in place to raise a grievance, complaint or concern, zero modern slavery breaches were reported. In the instance that an allegation of modern slavery is made in our operations, it would be reviewed and comprehensively investigated by a senior member of EnergyAustralia's People and Culture team and Group Internal Audit. Any breach of our policies or procedures could result in measures such as individual disciplinary action, corrective operational changes, or a review of compliance controls.

Zero instances related to modern slavery have been reported in 2025 through the Grievance Resolution Guidelines, whistle-blower program, engagement survey or our incident management system.

# About our supply chain

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## i. Overview

As at 31 December 2025, EnergyAustralia had 2,643 active suppliers, 1447 (55 per cent) of which are classified as Australian small businesses. 95 per cent of our suppliers are registered with an Australian address, including several multinational suppliers with Australian headquarters, and these suppliers represented 88 per cent of our expenditure in 2025. In 2025, EnergyAustralia's total spend with suppliers was \$1.2 billion for goods and services, and \$1.2 billion for spend for fuel (coal and gas) for a total of ~\$2.4 billion.

Many of our suppliers have supply chains that are outside Australia. We rely on supplier Self-Assessment Questionnaires to report about their own operations and supply chains, and independent third-party data. We use this information in conjunction with human rights reports, media articles and our risk framework to assess the risk of modern slavery in our supply chain (see below).

## ii. Risks of modern slavery

According to the Global Slavery Index 2023, Australia imports an estimated \$USD 17b of products with a high risk of modern slavery. These products include electronics, solar panels, clothing, shoes, batteries, timber and textiles, products that EnergyAustralia obtains from our suppliers through global supply chains. It is possible that EnergyAustralia could be directly linked to modern slavery if any of the goods that are imported to Australia and purchased by us were produced, transported and provided using modern slavery at any point in the supply chain. We recognise that the risk of modern slavery is more likely to be higher in the lower tiers of our supply chain, where we have less visibility and influence. Through discovery sessions with our large and multinational suppliers we are increasing our knowledge of their complex supply chains to understand how they utilise their influence to reduce the risks of modern slavery.

Our Risk Assessment Framework considers risk factors based on registered supplier location and the commodity or product they provide. In addition to our own due diligence, we use independent external data, and other independent research to determine the risk of the commodities and products we purchase. We use an independent third-party data service which provides us with information on sanctions, watchlists and adverse media data to understand supplier risk across a range of areas, including modern slavery.

In 2025 we reviewed and updated our Risk Assessment Framework, expanding it to consider high risk raw materials, and the geographies that those raw materials are extracted from, when considering the commodities that we use that are at risk of modern slavery. We utilised data from the Office of the New South Wales Anti-Slavery Commissioner in refreshing our Risk Assessment Framework.

In 2025, we had 3 suppliers who were registered in two potential high-risk geographic locations for modern slavery: India and the Philippines. EnergyAustralia also has out-sourced call-centres and back of house services in the Philippines and India. We monitor these services in accordance with our policies, processes and frameworks. We have not found any evidence of Modern Slavery risk in our back of house/call centre suppliers, including through our own internal audits of these sites and regular site visits. Our contracts have stringent terms requiring vendors to comply with laws, Regulations, and EnergyAustralia Policies and Procedures and we have governance practices in place with our suppliers and regular oversight of vendor performance.

The primary commodities we consume that are high risk are:

### **Solar collect devices/solar panels**

There are multiple allegations of modern slavery in the global solar supply chain, particularly in relation to polysilicon production, connected to the Xinjiang Uyghur Autonomous Region (XUAR) of China. Independent research and foreign Government legislation have guided our assessment of risk in this area.

### **Batteries**

We are aware of the modern slavery risks, including child labour, in the mining of cobalt in DR Congo and lithium in China, key components of lithium-ion batteries. We are also aware of recent allegations about forced labour being used in the production of lithium-ion batteries in China. Other vulnerable workers, such as migrant workers, are involved in manufacturing lithium-ion batteries in South Korea.

### **Electronic Goods (including computers, communication devices, electronic hardware, office machines, domestic appliances, and car electronics)**

The electronic manufacturing industry has had numerous allegations of modern slavery through all levels of the supply chains of componentry including in the sourcing of raw materials from high-risk geographies. The industry is at risk of forced labour and human trafficking including the use of migrant labour particularly in countries where electronics are predominantly produced.

### **Clothing, Office Fabrics, Carpet and Footwear**

Multiple allegations, both current and historical, have been made in relation to the manufacture of clothing and footwear, in multiple countries, from raw materials to finished goods. Reports also claim that cotton from Xinjiang Uyghur Autonomous Region is produced by forced labour and laundered through other countries to hide its point of origin. Forced and child labour in the harvest of cotton is reported in some Asian countries.

### **Security, Construction and Cleaning Services**

Security, Construction and Cleaning Services are considered a high risk of modern slavery in Australia due to the prevalence of sub-contracting arrangements in the industry and high rates of migrant labour.

### **Personal Protective Equipment (PPE)**

The Australian latex and nitrile glove industry have reported on forced labour found in their factories and supply chains.

Secondary commodities that we will monitor in 2026 to consider if the risk is material to EnergyAustralia are:

### **Tools and Machinery**

The mining and smelting of aluminium, copper, conflict minerals (tin, tantalum, tungsten and gold), and nickel, key metals in the manufacture of tools and machinery, have numerous allegations of modern slavery from mining through to finished goods due to the use of vulnerable workers such as children and migrant labourers.

### **Furniture**

Furniture produced in some countries is at risk of modern slavery due to the use of vulnerable workers such as migrant labour and prevalence of debt bondage.

### **Timber**

Timber harvested in some countries and used in construction in Australia has a high risk of modern slavery due to the use of vulnerable workers such as child or migrant labour, and the prevalence of debt bondage.

## **iii. Assessing modern slavery risks**

In 2025 we continued to use our supplier onboarding and risk management tool, Trust Your Supplier (TYS). This tool allows us to have a risk view of suppliers, through utilising an independent third-party data service, and to send and receive questionnaires to suppliers. Two questionnaires relate directly to modern slavery risk, and all new suppliers are required to complete the assigned questionnaires before they can be onboarded. Large companies (companies with over 100 employees) are assigned the Employment Standards questionnaire which covers: percentages of migrant, child, refugee, itinerant and prison workers; recruitment fees; document retention; pay deductions; and company labour policies. Small and Medium sized Enterprises (SMEs) complete the Human Rights and Modern Slavery questionnaire. This questionnaire is shorter in length, asks the supplier about whether they have a Human Rights or Modern Slavery policy as well as whether any of their workers are migrant, child, refugee, itinerant or prison workers.

The TYS platform captures organisational size, location and key personnel, and has a range of other questionnaires we have adopted as standard such as Ethics and Compliance, Company Operations, Anti-Bribery and Anti-Corruption, Information Security, Conflict Minerals, Diversity, Equality and Inclusion, Supplier Diversity, Government Relations, Labour Hire Licencing, Sustainability and Insurance.

In 2025, we asked 368 suppliers to complete one of the two questionnaires that cover modern slavery. We received 386 completed questionnaires in 2025, which included questionnaires that were requested in 2024 and completed in 2025. We also received 2 responses to our previous Modern Slavery and Responsible Procurement questionnaire. In total, we have 213 questionnaires outstanding since the 2024 implementation of TYS. We will continue working with suppliers to register on TYS and to complete the requested questionnaires. We will continue to proactively monitor third party supplier related data to identify and manage modern slavery risks.

As part of contract negotiations with existing suppliers, we now require those suppliers to complete registration on TYS as a condition of contract execution. This enables early identification and management of supplier risks during the contracting phase, while providing visibility of suppliers' governance frameworks and policies.

As part of our supplier onboarding process, all suppliers are asked to confirm that they will abide by our [Supplier Code of Conduct](#) (the Code). We expect our suppliers to read, understand and ensure that their business, suppliers and subcontractors meets these standards and comply with the Code. This includes paying wages and benefits in accordance with the law; workers not exceeding local work hour limits or 60 hours per week; and prohibiting the use of forced labour, and child and underage labour.

Of the suppliers who completed the 2025 questionnaires, 95 small and medium sized suppliers indicated that they did not have a Human Rights or Modern Slavery policy. The questionnaire allows suppliers to select a date when they will have a policy in the future. For those organisations that are medium sized enterprises, we actively monitor with follow up undertaken to understand their progress in developing the relevant policy.

Where large enterprises report a high proportion of migrant or refugee workers, we undertake an enhanced review of their full questionnaire responses and supporting policy documentation. This assessment is complemented with adverse media screening related to their labour practices to inform an overall view of modern slavery risk and determination of appropriate risk management actions for the supplier.

In 2025, when responding to our Employment Standards questionnaire, a supplier disclosed the use of prison workers, a vulnerable population at risk of forced labour. This triggered enhanced due diligence and in our discussion with the supplier to understand whether this was a modern slavery risk, they informed us that they were participating in a program in New South Wales for incarcerated women who were at the end of their sentences. These workers volunteered to be a part of the program, were paid above the minimum wage for their work and the money held in trust until their release, providing them with both recent work experience and access to a lump sum on release. This demonstrates the effectiveness of our due diligence processes in identifying potential modern slavery risks and appropriately assessing labour practices within the supply chain.

We continue to strengthen supply chain transparency with solar panel and battery suppliers, by combining publicly available data with supplier provided information to raw material level where practicable. This approach enhances our understanding of how modern slavery risks are identified and managed across these supply chains.

During 2025 we made a Conflict Minerals questionnaire mandatory for all suppliers registering through TYS. The questionnaire seeks disclosure where they are providing goods containing tin, tantalum, tungsten or gold (3TG), as well as cobalt, providing additional insight into potential modern slavery risks in our suppliers' supply chains. One of our suppliers recently stated in their questionnaire, that they were providing goods containing conflict minerals and advised that they were a member of the Responsible Minerals Initiative. They provided us with a copy of their most recent Conflict Minerals Report detailing the products they supply, the conflict minerals used, which smelters refined them and where those smelters obtain their ore. These disclosures provide deeper supply chain visibility and demonstrate the effectiveness our due diligence processes.

For other high-risk commodities, we leverage data within the TYS platform together with independent reports to maintain current visibility of supply chain risks and inform ongoing risk management.

For the purchase of international carbon offset certificates, EnergyAustralia obtains reports from independent third-party project verifiers for major purchases which, in part, examines the human rights risk of projects. These reports inform purchasing decisions from the carbon offset project based on the risks of modern slavery in the supply chain or ownership of the project. EnergyAustralia sourced international offset certificates for its Go Neutral product, which was phased out in 2025 and accordingly we anticipate fewer or no assessments on these certificates going forward.

#### iv. Policies and contractual terms

Our [Purchase Order terms](#) and contract precedents require suppliers to confirm that they consider the risks of modern slavery in their operations and supply chain and will notify us of any suspected or actual instances of modern slavery within their operations and supply chain.

In addition, as external funding sources require undertakings above and beyond our standard terms and conditions we share those with our suppliers as required by the funding source.

#### v. Investigating allegations of modern slavery

EnergyAustralia actively monitors various sources for relevant information that can help inform our understanding of risks. We are aware of allegations of modern slavery at an industry level (such as in the manufacturing of solar panels, and nitrile and latex gloves). For 2025 we are not aware of any specific allegations regarding our suppliers or their supply chains. We work with our suppliers to understand their supply chains, what actions they would take to address or remediate issues and to

understand how their governance policies and processes act to mitigate risks of modern slavery. Only as a last resort would we terminate a relationship with a supplier. We continue to work with industry and other stakeholders including government, as we seek to help mitigate the risk of modern slavery practices occurring in the supply chains of goods and services.

## Assessing effectiveness

An effective response to modern slavery is one where our policies, processes and other actions identify the modern slavery risks in our supply chain including any emerging risks, where we mitigate those risks, and where we respond appropriately to any instances of modern slavery.

We acknowledge that the hidden nature of modern slavery can make it difficult to accurately determine the full impact of our actions and initiatives. We remain committed to continuous improvement in our approach to assessing the risks of modern slavery in our operations and supply chain. In determining whether measures are effective, EnergyAustralia considers factors such as reduction in residual risk, increased supplier transparency and closure of identified risk issues within defined timeframes.

Focus	Objective	Actions	2025 Output	Outcome
Risk identification, assessment and management	<p>Identifying and managing modern slavery risks in EnergyAustralia's supply chain</p> <p>Identifying and managing modern slavery risk in EnergyAustralia's operations</p>	<ul style="list-style-type: none"> <li>Monitoring supplier risk through media alerts and third-party risk services</li> <li>Issuing and assessing self-assessment questionnaires to suppliers</li> <li>Maintaining our grievance and whistleblowing programs, review of half yearly engagement survey results and comments</li> </ul>	<ul style="list-style-type: none"> <li>Continued using the Trust Your Supplier platform to have a risk view for all suppliers</li> <li>370 Supplier Self-Assessment Questionnaires requested</li> <li>Grievance and whistleblowing programs maintained, review of engagement survey results and comments undertaken</li> </ul>	<ul style="list-style-type: none"> <li>Increased supply chain transparency</li> <li>Increased understanding of potential supply chain and operational risks</li> <li>Clarity of how seriously EnergyAustralia takes any conduct that is unlawful, improper or in breach of our policies and how to report and seek support</li> </ul>

Engagement	Continuing engaging with our people, suppliers, customers, investors, regulators, industry, and civil society	<ul style="list-style-type: none"> <li>Active participation in industry and civil society forums</li> <li>Information sharing with strategic suppliers and commercial and industrial customers about Modern Slavery risk</li> </ul>	<p>Attended briefings with or met: Fair Supply; Walk Free Foundation; Attorney General's Department and United Nations Business and Human Rights Regional Forum.</p> <p>Met with peer organisations and suppliers to share information regarding Modern Slavery</p>	<ul style="list-style-type: none"> <li>Building capacity and new industry norms</li> <li>Collaborative approach to modern slavery risk assessment, and mitigation and remediation activities where required</li> </ul>
Education	<p>Increasing awareness and understanding of modern slavery risks throughout EnergyAustralia</p> <p>Ensure that mandatory Code of Conduct Training is completed by staff and relevant contractors</p>	<ul style="list-style-type: none"> <li>Develop bespoke Modern Slavery learning module</li> <li>Monitor completion of training and ensure completion</li> </ul>	<ul style="list-style-type: none"> <li>Face to face sessions delivered to Procurement.</li> <li>An online training module available to all staff</li> <li>97.1% of our employees completed their Core Compliance modules by the due date, across the company</li> </ul>	<ul style="list-style-type: none"> <li>Awareness of modern slavery risks and obligations across our Operations and Supply Chain</li> </ul>
Oversight	Embed ownership of modern slavery risk and processes in the Board and Executive Sustainability Committees	<ul style="list-style-type: none"> <li>Modern slavery is a recurring agenda item</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Senior oversight of modern slavery risk across operations and supply chain</li> </ul>

Against our priorities for 2025, we have made the following progress:

<b>Improvement initiative</b>	<b>Progress</b>
<p>Introduction of Core Compliance Learning and linkage to Annual Incentive Program (AIP) to reflect our emphasis and focus to do the right thing and operate legally, ethically and within the regulatory requirements set out by our industry.</p>	<p>The 2025 AIP Rules (released September 2025) include a gateway requirement that employees complete all mandatory compliance training by 31 January 2026 to be eligible to receive an AIP payment.</p> <p>All business units currently have at least a 95% completion rate for mandatory compliance training.</p>
<p>Centralised hazards, concerns and grievances case management into a single platform, Integrum, enabling a consolidated view for identifying themes and actions, and reporting to the Executive Leadership and Board subcommittees.</p>	<p>In addition to safety incidents/hazards (which had previously been centrally reported via Integrum), all employee relations matters (including grievances and complaints) as well as whistleblower matters are now centrally managed via Integrum and a consolidated 'report a workplace concern' tile &amp; page has been established in Lighthouse. This data, and associated themes/actions are regularly reported to the ELT and Board.</p>
<p>A new Health and Safety induction module covering both physical and psychosocial hazards will be launched Q1 2025.</p>	<p>The new training module was launched in 2025, following which it has now been integrated into EnergyAustralia's overarching Health &amp; Safety training module, that all employees and relevant contractors are required to complete annually.</p>
<p>Discuss tier 2 suppliers with our strategic and high-risk suppliers to understand Modern Slavery risk in our Supply Chain.</p>	<p>EnergyAustralia continued discussions with our Battery Energy Storage Solution and Solar PV suppliers to deepen our understanding of their supply chains and mitigate modern slavery risk. This work will continue in 2026.</p>
<p>Focus sessions on our EA Way behaviours which reinforce speaking up and taking action</p>	<p>The Organisational Development team conducted voluntary feedback sessions in Q1 2025 with participants from the 2024 Focus sessions.</p>

if you see something that's not right.	
Establish a cross-functional working group to progress supplier audit activity.	Continue to work with relevant areas of our business to apply a broader risk lens in relation to potential audit activity.
Continue working with suppliers who have not yet completed our Modern Slavery Survey.	Utilising Trust Your Supplier we are inviting all existing suppliers to register for supplier onboarding purposes. Questionnaires relating to Modern Slavery will be assigned to suppliers in accordance with our risk framework. Existing suppliers who have been invited to register and who have not completed their registration are followed up regularly and this work will continue in 2026.
Continued improvements to our internal processes and policies in line with best practice.	EnergyAustralia's governance processes include regular reviews of policy and process documents. Multiple People and Culture policies were reviewed and updated across 2025.  The Procurement Policy and Modern Slavery policy will be updated in 2026, post the Procurement process simplification initiative which will commence in early 2026.
Ensuring our Procurement teams maintain their current training and awareness of modern slavery risks and practices, both globally and within our business.	EnergyAustralia completed annual training for the Procurement team in 2025.
Continuing collaboration with other organisations to share knowledge and improve processes, including how to tackle issues of modern slavery if identified.	EnergyAustralia has held discussion with multiple companies in 2025 regarding supplier risk, including modern slavery risk. We have also participated in forums and briefings on modern slavery with other Australian organisations. This will continue in 2026.
Ensuring our People and Culture team maintain their current training and awareness of modern slavery risks and practices.	Revised training modules for the Code of Conduct was launched in March 2025, including updated People & Culture components. Training to be refreshed in 2026 following new People & Culture operating model being implemented.

## Looking ahead

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Our work to identify and mitigate modern slavery risks in our business is an ongoing process. Our efforts to date have set a strong foundation for continued improvement. Building on what we've learned so far, EnergyAustralia will continue to refine its approach with best practice advice.

Our priorities for 2026 are:

- Ensuring our People and Culture team uplift their current training and awareness of modern slavery risks and practices in our Operations
- Continued refinement of our supplier categorisation to build an improved understanding of our current supplier risk landscape
- Prioritising high-risk commodities to gain a clear view of overall commodity exposure and associated supplier risks, enabling targeted and effective risk mitigation.
- Continue discussions with our suppliers to understand modern slavery risk in their supply chains and the actions they are taking to mitigate
- Continue to work with relevant areas of our business to apply a broader risk lens in relation to potential audit activity
- Progress our work to align to the UN Guiding Principles including updating our Supplier Code of Conduct to include reference to the UN Guiding Principles
- Ensuring our Procurement team maintains their current training and awareness of modern slavery risks and practices in our supply chain
- Continuing collaboration with other organisations to share knowledge and improve processes

## Consultation

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All EnergyAustralia entities operate under a common set of governance policies and we act as one organisation. Work undertaken by our Procurement, People and Culture and Risk Assessment teams outlined in this Statement included engagement with our senior leadership and Executive Leadership Team and each reporting entity covered by the Statement and the entities we own or control.

EnergyAustralia is aware of the limitations of buying power that we have as a company, and as part of an industry, with some large multinational or foreign government owned companies. We remain committed to working with industry bodies, Australian government agencies and bodies, and Non-Government Organisations (NGOs) to be aware of specific and broader allegations of modern slavery and to work collectively in reducing modern slavery risk. To this point EnergyAustralia met with several customers, suppliers, other companies, government and NGOs

during 2025 in order to share information, learn from each other, and increase understanding on modern slavery risks, actions, reporting frameworks, and strategies.

## Approval

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The Executive Leadership Team of the EnergyAustralia Group has also been involved in the review and endorsement of this Statement. This Statement was approved on 6 May 2026 by the board of EnergyAustralia Holdings Limited, the holding entity of the EnergyAustralia Group, after consultation with the Board Sustainability Committee and the Boards of the reporting subsidiaries entities.



**Mark Collette**

**Managing Director, EnergyAustralia**



**Bob Grant**

**Chair of the Board, EnergyAustralia**

At EnergyAustralia, we recognise the Aboriginal and Torres Strait Islander peoples as the Traditional Owners of the land on which we operate and the communities we serve. Our goal is to build working relationships with Aboriginal and Torres Strait Islander peoples, communities and businesses. Through reconciliation we live our behaviours of being purposeful and making a difference.

## EnergyAustralia Holdings Limited

Level 19  
Two Melbourne Quarter  
697 Collins Street  
Docklands Victoria 3008

Phone +61 3 9060 0000  
[eng@energyaustralia.com.au](mailto:eng@energyaustralia.com.au)  
[energyaustralia.com.au](http://energyaustralia.com.au)

**LinkedIn** [@EnergyAustralia](#)  
**Facebook** [@EnergyAustralia](#)  
**Twitter** [@EnergyAustralia](#)

## EnergyAustralia Whistleblowing information

You can submit a report in a number of ways:

1. In writing or verbally to Head of Group Internal Audit on (03) 9060-0000 at Level 19/697 Collins Street, Docklands, Victoria
2. Contacting the anonymous externally hosted channel 'Fair Call' via
  - **Phone:** 1800 500 965. This free call number is available 24 hours, 7 days a week.
  - **Email:** [faircall@kpmg.com.au](mailto:faircall@kpmg.com.au)
  - **Web:** <http://faircall.kpmg.com.au>. Whistleblowers may complete and submit a form online. This method does not permit two-way communication unless the whistleblower provides contact details.
  - **Post:** FairCall Manager, PO Box H67, Australia Square 1213, Sydney