

JOINT MODERN SLAVERY STATEMENT

Pioneer Sail Holdings Pty Ltd (and its subsidiaries)

Reporting Period: 1 January 2023 – 31 December 2023

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

CONTENTS

Board Approval	3
Introduction	4
About the Reporting Entities	5
Pioneer Sail Holdings and Pioneer Sail Australia	5
Alinta Energy	5
Latrobe Valley Power	8
How we understand our modern slavery risks	9
Harnessing expert insights	9
Supplier engagement	9
Growing industry awareness	10
Key modern slavery risks for the Reporting Entities	11
Managing our modern slavery risks	12
Policy	13
Risks, obligations and opportunities	13
Strategy and planning	14
Action	14
Monitoring and remediation	16
Governance and measuring effectiveness	17
Tracking progress and future commitments	18
Appendix 1	20
Requirements of the Modern Slavery Act 2018	20
Feedback	21

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.



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.



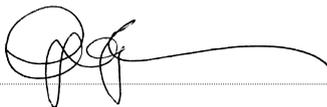
Alinta Energy Pty Ltd – ABN 64 614 975 629

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



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.



INTRODUCTION

Pioneer Sail Holdings Pty Ltd (PSH) and its subsidiaries Pioneer Sail Australia Pty Ltd (PSA), Alinta Energy Pty Ltd (Alinta Energy) and Latrobe Valley Power (Holdings) Pty Ltd (LVP) (collectively, the Reporting Entities), are committed to doing business fairly and ethically, and implementing effective practices which support us in this goal. We oppose modern slavery in all its forms, including slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery-like practices, forced marriage and deceptive recruiting for labour or services. We expect our employees, contractors and suppliers to do the same.

This Modern Slavery Statement, covering the period 1 January 2023 to 31 December 2023, is our fourth public statement on this issue.

Modern slavery continues to be one of the greatest human rights challenges of our time, with estimates in 2021 of almost 50 million people meeting the definition of modern slaves¹.

No modern slavery grievances have been reported to our whistleblower hotlines to date. We understand that this may be a reflection of the need to dig deeper, with stronger due diligence practices, and to find additional ways to communicate our grievance processes, rather than the absence of modern slavery in our supply chains.

Our efforts to date have been primarily focused on raising awareness across our businesses, embedding references to modern slavery within relevant policies, standards and procurement processes, establishing governance structures, including a dedicated working group, and establishing reporting processes. We also created supplier self-assessment questionnaires, which new suppliers have been required to complete.

Similar to many other organisations, the main challenges we face with managing modern slavery remain:

- The large number of suppliers we use and our complex supply chains;
- Limited guidance beyond high-level and theoretical frameworks, and a lack of explicit case studies to inform our approaches;
- Contradictory information obtained from different consultant reports and other information sources;
- The limitations of data obtained primarily from supplier-completed self-assessments;
- Lack of transparency across globalised supply chains and specific regions of manufacture.

Our focus throughout 2023 was on developing strategies to address some of these challenges. A key strategy was building a network of experts and peers to ask questions and brainstorm ideas. This has been done through varied approaches:

- By actively participating in the Clean Energy Council's Managing Risks of Modern Slavery Working Group.
- By attending conferences and industry events organised by the Attorney General's office, the NSW Anti-Slavery Commissioner, and the Clean Energy Council, amongst others.
- By conferring with peers responsible for managing the risks of modern slavery in a range of organisations, including outside of the energy sector. We've also liaised closely with expert staff from one of our community partners, the Salvation Army.
- By engaging expert advice to broaden our perspectives and access to tools and datasets.

Highlights in this reporting period include:

- The commencement of a procurement process to obtain a due diligence and screening software solution to be used to manage Environment, Social and Governance (ESG) risks including modern slavery. This procurement was finalised in early 2024. This tool will be deployed throughout the 2024 calendar year.
- Work on an updated supplier risk assessment by an external consultancy was completed, as well as a deep dive analysis into six high-risk suppliers and two high-risk industry categories (lithium-ion batteries and solar panels).
- Internal stakeholder consultation to develop our first three-year Modern Slavery roadmap.
- The Modern Slavery Working Group was expanded to an Ethical Sourcing Working Group to ensure wider input from across the business and integration with a wider range of ESG due diligence activities.
- Alinta Energy's Sustainability Manager became the Chair of the Clean Energy Council's 'Risks of Modern Slavery' Working Group. This working group has been building strong ties with the NSW Anti-slavery Commissioner and supporting the development of a Code of Practice for the renewable energy sector.

Please note that detailed findings of our due diligence activities are not included in this Statement to ensure that commercial confidence is preserved, and to maximise the likelihood of meaningful and candid participation by suppliers in future modern slavery risk assessments and mitigation activities.

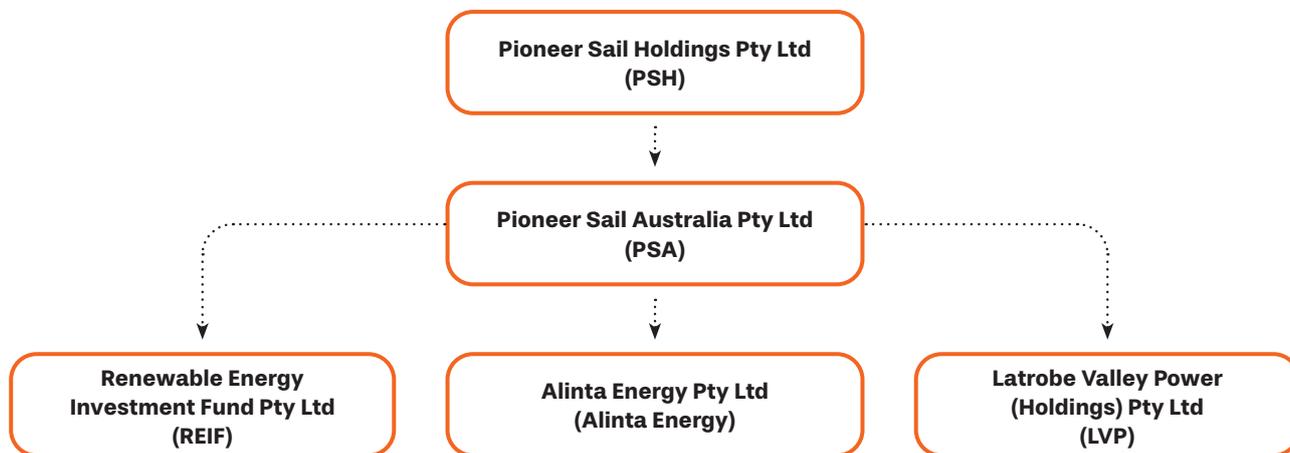
We welcome feedback or questions about this report, which can be sent to modernslavery@alintaenergy.com.au for any of the Reporting Entities.

¹ International Labour Organization (ILO), Walk Free and International Organization for Migration (IOM) (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriages. Geneva.

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 Pty Ltd (Alinta Energy), Latrobe Valley Power (Holdings) Pty Ltd (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 particular 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, 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 have employment arrangements in place to support each of their respective activities.

Alinta Energy

Alinta Energy is an Australian incorporated, private company headquartered in Sydney, with offices in Melbourne, Perth, Adelaide, and a Customer Experience Hub in Morwell, Victoria.

Alinta Energy's subsidiaries, unit trusts and joint ventures all relate to the energy industry.

Alinta Energy supplies retail electricity and gas to customers and operates electricity generation, storage and transmission facilities across mainland Australia, and one power station in New Zealand.

We have been supplying energy in Australia for over 20 years and have approximately 1.1 million customers. We employ over 1,100 people.

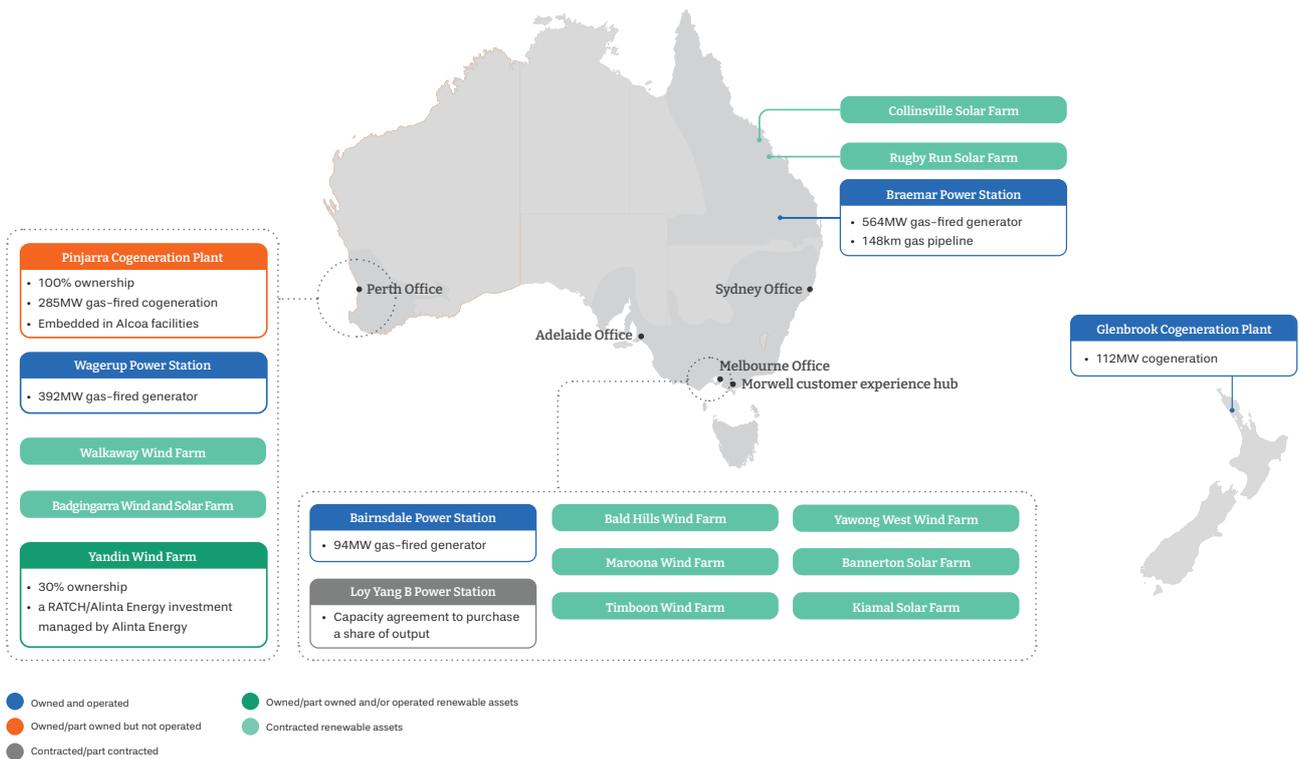
Our main activities are:

- **Electricity Generation** – we own, operate, develop, and invest in electricity generation facilities, including power stations, wind farms and solar farms. In some cases, we have constructed these facilities and in others we have entered into power purchase agreements (PPAs) with other parties.
- **Storage** – while we sold our battery energy storage facility in the Pilbara region of Western Australia last year, we are building a 100MW battery next to our Wagerup power station in WA and are exploring other significant storage opportunities, particularly pumped hydro at Oven Mountain in NSW.
- **Distribution** – we own and operate distribution assets such as gas pipelines.
- **Energy supply** – we provide electricity and gas to customers including households, small businesses, commercial and industrial organisations.

We generate and/or retail electricity in New South Wales, Victoria, Queensland, South Australia and Western Australia's South-West Interconnected System (SWIS, including Perth). Until the sale of a suite of our assets to APA Group in November 2023, we also operated in the Pilbara region of Western Australia, which included transmission lines.

We operate in all major mainland Australian wholesale electricity markets. We own and operate an electricity generation facility embedded in the NZ Steel facility in Glenbrook, on the North Island of New Zealand.

We also retail gas in New South Wales, Victoria, Queensland, South Australia and Western Australia and own (or have an equity share in) gas transmission pipelines in Queensland and until November 2023, also in Western Australia. This is illustrated in the diagram below. Additional detail can be obtained from our annual Sustainability Report available on our website.



In addition, Alinta Energy is a participant in two joint ventures, with whom we work to address any modern slavery issues, noting that to date, none have been directly identified. These are:

- **Yandin Wind Farm** – in Dandaragan 175km north of Perth. This is a joint investment venture between RATCH-Australia Corporation Pty Ltd and PSA (through the investment by REIF, which holds a 30% non-controlling ownership interest). Alinta Energy performs management activities including managing the original construction, ongoing operation, maintenance, procurement and provision of other professional services. The supply chain includes domestic and international suppliers, with key equipment and expertise sourced from Asia and Europe; but with most labour sourced within Australia. Because Alinta Energy's procurement systems are used, spend associated with this joint venture is captured in risk identification and due diligence activities undertaken by Alinta Energy.
- **A 50/50 joint venture with CS Energy Ltd** – a Queensland Government-owned electricity generator. The joint venture supplies electricity and gas to customers in the EnergeX Distribution Area in south-east Queensland, with Alinta Energy managing the retail operations.

Until November 2023, we had an 11.8% ownership interest in the Goldfields Gas Transmission Pipeline joint venture, connecting the Pilbara region of WA to Kalgoorlie.

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).

Alinta Energy's values are:



Avoiding modern slavery in our supply chains aligns strongly with our values, particularly Safety, People Matter and Respect & Integrity.

Alinta Energy procures goods and services from over 4,000 direct suppliers. Of the direct (Tier 1) suppliers in our procurement system (excluding credit card purchases which are not material), 97% are located in Australia. Key goods and services that we procure 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;
- Consumables including office supplies and staff uniforms.

Latrobe Valley Power

Latrobe Valley Power (LVP) is an Australian incorporated, private company with a registered office in Sydney, Australia. All of LVP's and its subsidiaries' activities relate to the energy industry. LVP owns and operates the Loy Yang B Power Station, a brown coal-fired power station in Victoria's Latrobe Valley, approximately 160km east of Melbourne.

The power station consists of two electricity-generating units, which together provide up to 1,200MW of baseload power and supply approximately 20% of Victoria's energy needs. Loy Yang B has operated since 1993 and continues to be one of the lowest cost and most reliable generators in the National Electricity Market. Loy Yang B procures coal from a neighbouring coal mine under a long-term supply agreement.

LVP has a capacity agreement with Alinta Energy, supplying it with a share of the power station's output. Loy Yang B Power Station operates under local management, including a local procurement team responsible for its supply chain. Most of its procurement activities are conducted through one subsidiary company, LYB Operations & Maintenance Pty Ltd.

LVP has an international supply chain, however, uses best endeavors to procure goods and services from within Australia and particularly from the local community in the Latrobe Valley, Victoria. Key inputs into the supply chain include the purchases of:

- Coal used at our Loy Yang B Power Station; and
- Goods and services related to the operation and maintenance of the Loy Yang B Power Station.



HOW WE UNDERSTAND OUR MODERN SLAVERY RISKS

Our transition from fossil fuels towards renewable energy brings with it exposure to different supply chains and associated modern slavery risks. As we navigate new supply chains, we will continue to build our understanding and enhance our risk management and due diligence activities.

It remains difficult to identify all risks associated with modern slavery in the context of our diverse operations. Globalisation has meant that supply chains grow increasingly long and dispersed, and many problems can be well-hidden deep within supply chains or in countries that do not facilitate collaborative approaches. Many suppliers do not have publicly available information on their approach to preventing modern slavery. This may, to some extent, reflect that corporate awareness surrounding modern slavery is still maturing rather than concealing the existence of an actual 'high-risk' supply chain and operations.

There were no material changes in LVP's operating activities or within their supply chains during the reporting period.

Alinta Energy had a material change to its operating activities with the sale of its Pilbara operations to APA Group in November 2023. While a significant part of our business, the types of activities that we conduct across our remaining operations are similar and pose similar risks.

As such, we do not consider that there has been a material change to our modern slavery risk as a result of this divestment.

Harnessing expert insights

We have continued to use expert advice to guide and inform our approaches to managing risks of modern slavery. In the previous reporting period, we engaged an external company to conduct a supplier risk assessment and supplier deep dive assessment, which was completed in this reporting period. This included providing training to key stakeholders and developing a three-year roadmap for our modern slavery risk reduction activities.

This concluded that both Alinta Energy and LVP's overall risk rating is medium. They also found that high risk suppliers were approaching a basic level of modern slavery maturity, reflecting they were mostly smaller companies. The exception was suppliers who have published a modern slavery statement.

We identified some inconsistencies between the findings of this work and that of work performed earlier by different consultants, both in terms of industries and countries identified as highest risk. Accordingly, we have decided to rely on the risk assessment process set out in the Office of the Anti-slavery Commissioner (OASC) Guidance on Reasonable Steps, released at the end of the reporting period (late December 2023), to inform future process changes.

Late in the reporting period, we engaged a separate consultant to engage with key internal stakeholders to inform prioritisation of actions within our roadmap.

We also speak regularly with other experts in this field to seek advice and insights. During the year, we engaged with staff with modern slavery responsibilities within several other organisations to understand alternative perspectives.

Supplier engagement

Our suppliers remain amongst the most valuable sources of insights about modern slavery risks and mitigation measures within our supply chains. We have an automated supplier self-assessment questionnaire for new suppliers but have identified that the questionnaire needed to be better tailored to the risk level of the organisation and product/service types.

To resolve this in 2024, we'll be using a new, cascading, automated supplier self-assessment questionnaire associated with our new due diligence software. This will be complemented by automated screening from diverse external information sources, and we will expand our screening process in the new reporting period from only new suppliers to high-risk suppliers already in our supplier database.

We understand that the greatest risks in our supply chains, particularly for goods rather than services, are typically not within Tier 1 suppliers but further down the supply chain at the manufacturing level of key components, extraction of raw materials and assembly of goods. Because of this we will also use our new due diligence tool and supplier engagement processes to gather information about key risks further down our supply chains.

LVP uses a supplier self-assessment questionnaire to assist in assessing any modern slavery risks. For every tender, new supplier (or a reactivation of an old supplier) or new contract, the questionnaire must be completed. A risk assessment is then completed based on the responses prior to the approval of the supplier or contract. LVP will consider whether and how to amend this process once it has reviewed Alinta Energy's changed questionnaire process.

Growing industry awareness

Through our participation in the Clean Energy Council's Managing Risks of Modern Slavery Working Group, we aim to learn with our industry peers, benefitting from the diverse membership representing businesses across the supply chain.

The suite of resources released from the NSW Anti-Slavery Commissioner in December 2023, while aimed at supporting the NSW government organisations within his jurisdiction, will also provide us with useful insights in the next reporting period. We are keen to ensure that our systems align with these tools and processes. This ensures that we are better able to respond to the needs of NSW government customers, but also allows us to benefit from the large body of research informing these resources.

Our Sustainability Manager attended the three-day modern slavery conference arranged by the Attorney General's office in June 2023.

Key modern slavery risks for the reporting entities

We understand modern slavery risk is embedded in the supply chains of the goods and services used in power infrastructure construction and the wider range of activities we undertake. We understand that particular industries and countries have greater potential for modern slavery.

We are also aware that the four key factors which elevate risk are²:

- **Vulnerable populations** – including groups such as migrants and low skill workers
- **High-risk business models** – such as short-term and temporary work, the use of labour hire and outsourcing work to contractors, franchising, seasonality and aggressive pricing
- **High-risk procurement categories** – such as services procurement, goods not for resale and raw materials
- **High-risk geographies** – in regions with conflict, weak rule of law, corruption, displacement and state failure to protect human rights.

While we understand the principles, in practice, it is more difficult to assess risks given the complexity and opacity of international supply chains. There are still considerable limitations in our ability to gain reliable, verified information about suppliers. This is particularly so when goods or services are sourced through several tiers of suppliers.



Expert advice provided during the reporting period suggested that the highest risk industries in Alinta Energy's supply chain are as summarised in the table below.

Table 1 – Highest risk industry sectors – Alinta Energy

Industry sector	Factors impacting on risk
Electrical Equipment	This sector is understood to be high risk because of the high percentage of migrant labour used in manufacturing parts and components. Workers are vulnerable because of cultural/linguistic dislocation and a lack of support networks. This increases the risk of them being forced to accept poor job conditions and wages by unethical recruiters or employers.
Construction and Engineering	This industry has higher risks of modern slavery due to poor contracting practices associated with industries that extract and process raw materials. There is a reliance on third party labour hire contractors or temporary migrant workforces to meet high demand for manual labour. This can obscure employment relationships meaning even in developed countries there can be situations of modern slavery.
Textiles and Apparel	The textile industry is well known for modern slavery abuse, arising from extraction of raw materials (eg cotton) and the manufacture of goods. In Australia, the reliance on 'outworkers' who work from home presents a key risk, as they are typically underpaid and not offered the same protections as their factory-based counterparts. The workforce is typically comprised of female, migrant workers.

For our very small number of Tier 1 suppliers located overseas, identified countries of highest risk were 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 leverage we have over them.

For LVP, similar to Alinta Energy, the highest risk industries were found to be Construction and Engineering and Electrical Equipment. Additionally for LVP, a third high risk sector was Household Durables Industries. In some jurisdictions, this sector uses recruitment agencies to source labour, increasing the risks of trafficking and luring migrants into conditions of bonded labour.

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.

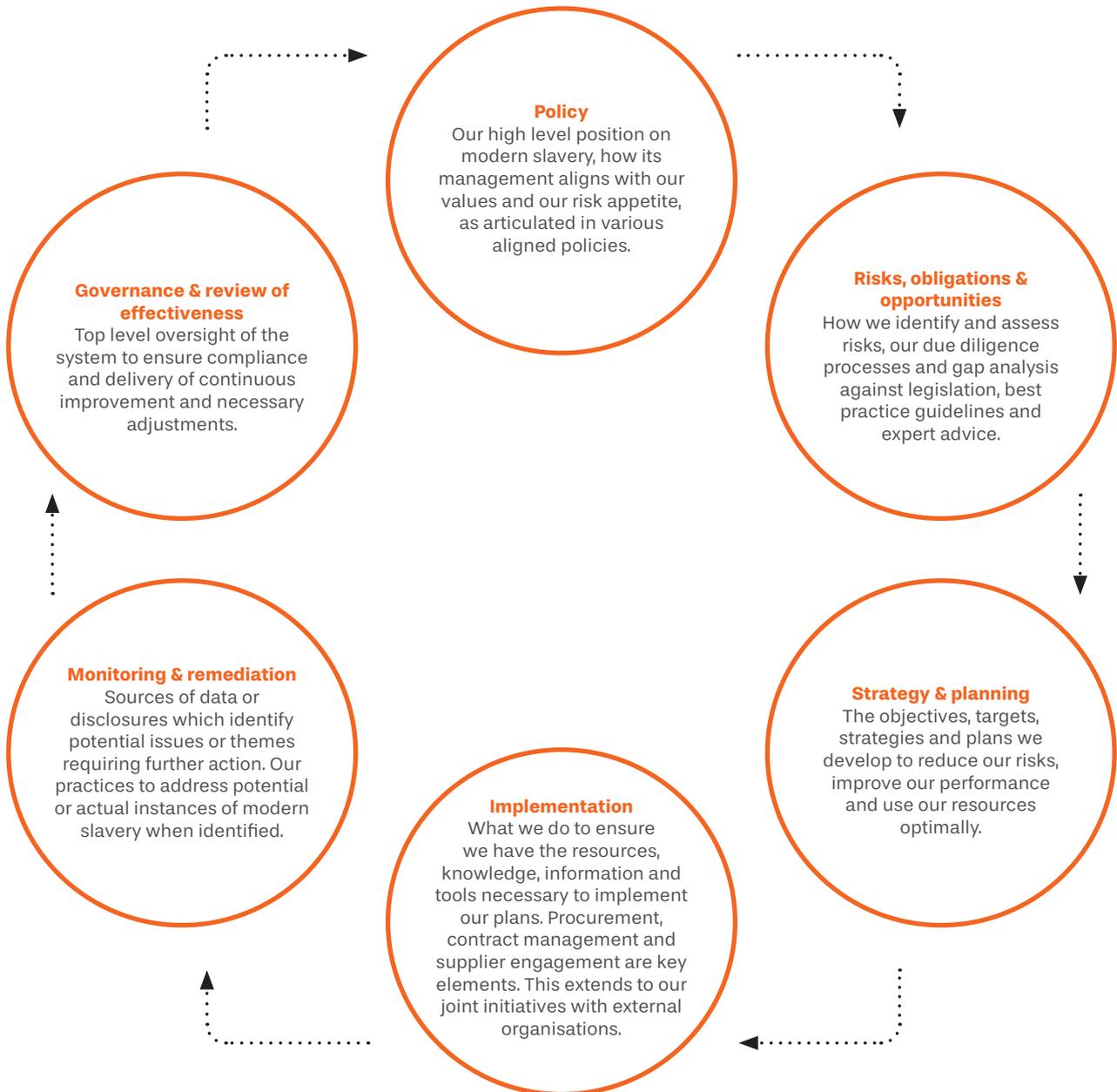
As discussed in last year's Modern Slavery Statement, other goods and services we procure beyond those discussed above that present higher risks of modern slavery include:

- 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

2 KPMG and Australian Human Rights Commission (2021). Resources, Energy and Modern Slavery. Practical Responses to Managing Risk for People. Sydney. Refer to Figure 3, p. 33.

MANAGING OUR MODERN SLAVERY RISKS

We take a systematic approach to managing identified risks of modern slavery. We described this approach in detail in our previous Modern Slavery Statement covering 1 July 2021 – 31 December 2022. In summary, the framework we have adopted is illustrated below and is loosely modelled on the structure of management system standards such as ISO 14001, contextualised with modern slavery terminology.



Policy

For Alinta Energy, relevant policies include:

- Code of Conduct
- Procurement Policy and Standards
- Whistleblower Protection Policy
- Supplier Code of Conduct

For Latrobe Valley Power, relevant policies and high-level documents include:

- LVP Employee Information Manual
- Procurement Policy
- Whistleblower Policy
- Supplier Code of Conduct

These documents were reviewed during the reporting period. The Alinta Energy Procurement Standards were amended significantly to include, amongst other things, more specific references to modern slavery considerations.

Risks, obligations and opportunities

We employ a number of different methods to identify and assess risks of modern slavery facing our business, as described below.

- **Analysing data from Monitoring and Remediation initiatives** – data to identify modern slavery concerns and themes is collected from multiple sources. This includes anonymous reports through the hotline, email feedback to the modern slavery inbox, supplier questionnaires and outcomes of supplier engagement.
- **Expert advice** – each year we engage expert advice on our risks and how to improve our processes. In this reporting period, a consultant identified high risk industries and conducted a deep dive investigation into a small number of selected suppliers to understand their human rights maturity was completed.
- **Analysis of our procurement databases** – data from our procurement databases, including spend on each supplier, industry types and country of origin of each Tier 1 supplier, is periodically analysed by external consultants to help identify modern slavery risks. In future our due diligence software will fulfill this function.

Processes to ensure we understand our modern slavery obligations include:

- **Gap analysis against legislation and best practice guidelines** – in this reporting period, the new resources by the NSW Anti-Slavery Commissioner were released, including an Inherent Risk Identification Tool. While not binding upon the reporting entities, this suite of tools provide helpful insights into best practice. Although the review of the Modern Slavery Act 2018 (Cth) was released during the reporting period, the legislation has not been amended.
- **Commitments from previous statements** – are captured in planning processes to ensure they are completed.

We also rely on information from external organisations and working groups, discussed earlier, to identify opportunities for improvement. The approach to risk assessment and due diligence will continue to evolve, particularly as we implement our new due diligence software in the following reporting period.

Strategy and planning

Using expert advice, we developed a three-year roadmap in consultation with key internal stakeholders to ensure relevance and effectiveness. The roadmap is a living document which will be updated periodically as additional opportunities for improvement are identified, particularly to align with our new due diligence tool.

Implementation

The implementation element addresses the various ways in which we implement and deliver upon our policies and strategies. It includes the sub-elements described below.

Resources, responsibilities and accountabilities

We allocate adequate resources and assign responsibilities and accountabilities to allow our modern slavery program to be effective.

The Sustainability Manager for Alinta Energy is responsible for preparing the annual Modern Slavery Statement, coordinating risk management activities across both Alinta Energy and LVP and responding to concerns and questions. A reasonable allocation of time is allowed for this function to ensure meaningful progress can be made. This is supplemented with a dedicated budget to allow additional support from consultants or other providers.

The Procurement Managers for Alinta Energy and LVP have oversight of the Procurement Policies and Supplier Codes of Conduct. Procurement is more decentralised at Alinta Energy and individual buyers are responsible for conducting their own due diligence, particularly for major procurement such as large projects, where tenderers are asked about their modern slavery practices for high-risk categories.

Accountability for ensuring compliance with modern slavery legislation and internal commitments sits with the Executive Leadership teams and the Boards of the Reporting Entities.

Consultation and communication

Internal consultation primarily takes place within our Ethical Sourcing Working Group (an expanded version of our now disbanded Modern Slavery Working Group), where members discuss practices and initiatives with their peers across the reporting entities. Additionally, opportunities for discussion arise during modern slavery training sessions. To ensure transparency and accountability, we actively seek feedback from interested stakeholders, including external parties. To this end, our annual Modern Slavery Statement encourages stakeholders to provide feedback, and we provide contact details for this purpose.

Employee training

Increasing employee awareness about the prevalence and nature of modern slavery risks within its supply chains and operations is important for both risk reduction and remediation. We are working to help our people develop the skills and experience required to understand, identify and mitigate modern slavery risks.

All staff at Alinta Energy and LVP complete induction training which includes discussion of modern slavery. Alinta Energy employees also complete refresher training every two years.

In the reporting period, external consultants ran an online, interactive training session which was attended by more than 50 key senior stakeholders with significant purchasing responsibilities or financial delegation across Alinta Energy and LVP.

Documentation

Modern slavery management requirements are documented in a range of locations such as the policies and standards described earlier in this section. The due diligence software will enhance this once implemented in the following reporting period. The Modern Slavery Statement also serves as a means of documenting our processes.

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 is available to provide advice about modern slavery issues upon request.

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

Alinta Energy and LVP have developed template contract clauses relating to modern slavery risks, and provide remediation, audit and termination options. In future reporting periods, the Reporting Entities plan to implement a process that ensures these clauses are appropriately applied in procurement activities across the business. At the very end of the reporting period (late December 2023), the NSW Office of the Anti-Slavery Commissioner released model tender and contract clauses which NSW government agencies are encouraged to use. We will review these clauses in the following reporting period with a view to adopting them if appropriate to do so, to reduce the administrative burden on businesses from having to respond to differently worded questions.

Supplier engagement

Alinta Energy's and LVP's Supplier Codes of Conduct 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.

We have a large number of suppliers (more than 4,000 for Alinta Energy and more than 500 for LVP) and to date, have relied on external consultants to assist us with assessing supplier risks, as described earlier. We also rely on self-assessment questionnaires completed by new suppliers as part of the onboarding process.

Our due diligence and screening tool, still undergoing procurement at the end of the reporting period, will support future automated supplier screening, systematic risk assessments and will serve as a repository of information obtained from suppliers.

Once implemented, it will also include links to supplier training and resources to support smaller suppliers. After we use it to complete initial screening, we intend to follow up selected suppliers with additional questions and some third-party audits.

We are mindful of the need to minimise the burden on suppliers from being repeatedly sent questionnaires and being asked to participate in desktop reviews and audits. This is particularly important for small to medium enterprises which are not necessarily resourced to support such activities. Wherever feasible, we will advocate for industry-wide solutions and approaches and use them, as appropriate, in our operations.

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 a number of channels, all of which are monitored regularly. These include the:

- **Independent Whistleblower Reporting Hotline** – no issues related to modern slavery were reported via the hotline during the reporting period.
- **Modern slavery inbox** – a generic email inbox, used for modern slavery correspondence across PSH operations. No concerns about potential incidents of modern slavery were shared via the inbox during the reporting period.
- **Feedback from other sources** – such as direct disclosures made by employees to their managers or executives, which are then communicated to the Sustainability Manager for inclusion in our modern slavery management system. No such issues were disclosed during the reporting period.

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

Corrective/Preventive Action Requests and Remediation

A systematic means of responding to requests for corrective and preventive actions is a critical component of any management system. This ensures that actions are appropriately investigated and implemented in a timely manner, providing oversight and ensuring effective management of potential issues.

We use a register within our Enterprise Compliance Management Framework to capture any corrective or preventive action requests relating to modern slavery, as well as other risks. This provides governance to ensure that identified issues are rectified in a timely manner as well as to identify any themes or trends. We will explore the opportunities for integration with our due diligence tool as we progress implementation in the following reporting period.

While no actual incidents of modern slavery in our supply chains have been raised to date, we have established a remediation process, which is outlined on the following page. Although it has not yet been activated, we have articulated the process to ensure that any issues related to modern slavery are identified and addressed in a timely and effective manner. We understand that this process is very high-level and will need to be fleshed out considerably to be useful in remediating an issue of modern slavery. In the following reporting period, we'll be working with the provider of our new due diligence tool to develop more detailed and rigorous processes to provide additional guidance and facilitate the process in the event of an incident.

▼ Incident is identified

- Whistleblower reporting hotline
- Employee and supplier awareness

▼ 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 element of our continuous improvement cycle is the governance and measuring effectiveness function, which includes a top-down management review conducted by our senior management. The objective of this review is to evaluate our system's performance in reducing modern slavery risks within our supply chains and to ensure that continuous improvement is demonstrated. This section outlines the various activities that comprise this element.

Measuring Effectiveness Framework

Assessing the effectiveness of a system is a critical element in driving continuous improvement.

The Measuring Effectiveness Framework is a self-assessment checklist designed to evaluate the extent to which various components of the management system contribute to our goal of reducing modern slavery risks. The framework includes criteria organised under five pillars:

1. Regulatory Compliance
2. Governance Framework
3. Training
4. Stakeholder Engagement
5. Monitoring

The Ethical Sourcing Working Group members complete this framework annually to assess trends in achievements over time, which informs the development of annual action plans. The findings from this review have been captured in this Statement.

Board and Board committees

Both Alinta Energy and LVP have separate Audit & Risk Committees that consider modern slavery as required. Additionally, Alinta Energy has an Environment, Safety, and Sustainability Sub-committee of the Board, which provides a platform for discussing modern slavery concerns and approaches.

TRACKING PROGRESS AND FUTURE COMMITMENTS

The table below provides a summary of our progress towards achieving the commitments outlined in our previous Statement and the additional activities we have committed to undertake in the next reporting period.

Element	Commitments	Progress in reporting period
Policy	Conduct a comprehensive review of all policies to ensure they reflect a high level of commitment to combat modern slavery	Complete. The Alinta Energy Procurement Standards were significantly amended.
Risks, obligations and opportunities	Complete the high-level risk assessment and deep dive into selected high-risk suppliers and industries and use the insights to inform creation of additional actions.	Complete.
	Implement the necessary modifications to our processes to ensure compliance with the changes resulting from the review of the Modern Slavery Act 2018.	Not required as although the review was completed, the legislation was not amended in the reporting period.
	Build a wider network of modern slavery experts to learn from, which may include academics, not-for-profit organisations and trade unions.	Ongoing.
	Enhance the functionality of the whistleblower hotline.	Not undertaken. Will be explored further in the next reporting period.
Strategy and planning	Finalise a comprehensive three-year roadmap and develop a detailed action plan for CY23 to achieve the objectives outlined in the roadmap.	Complete.
	Develop a clear strategy to gradually enhance due diligence measures for suppliers to effectively identify and mitigate modern slavery risks over time.	Commenced with the procurement of the due diligence software. To be continued in the next reporting period.
Action	Review and enhance accountability measures for modern slavery across the entire organisation.	Delayed until the next reporting period to be integrated with the development of workflows as the due diligence software is implemented.
	Provide additional modern slavery training to key internal stakeholders, with the presentation made available to all Alinta Energy and LVP staff.	Complete.
	Develop a comprehensive manual outlining our modern slavery management system.	Deferred to the next reporting period to coincide with the roll out of the due diligence software.
	Revise the Alinta Energy Supplier Self-Assessment Questionnaire to better identify low-risk suppliers and clarify any questions causing confusion.	Deferred to the next reporting period to coincide with the roll out of the due diligence software.
	Ensure the modern slavery model clauses are incorporated into new contracts for high-risk suppliers.	Deferred until the model contract clauses from by the NSW Office of the Anti-Slavery Commissioner can be reviewed.
	More accurately classify data in the LVP supplier database.	In progress.
	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.	In progress.
	Provide additional guidance to suppliers on modern slavery expectations and resources on the Alinta Energy and LVP websites.	Deferred to next reporting period due to a major branding campaign and redesign of the website at the end of the reporting period. Will be changed to coincide with the roll out of the due diligence software. LVP's website will be updated at the same time.
	Initiate a process of gathering information from long-standing suppliers, beginning with those in the highest risk industries.	Deferred to the next reporting period to coincide with the roll out of the due diligence software.
	Actively participate in the Clean Energy Council's Modern Slavery Working Group and explore opportunities to leverage its wider reach.	Ongoing.

Element	Commitments	Progress in reporting period
Monitoring and remediation	Conduct at least one audit, desktop or otherwise, of a supplier	Deferred to the next reporting period to coincide with the roll out of the due diligence software.
Governance and measuring effectiveness	Continue to present the Modern Slavery Statements to the Alinta Energy and LVP boards for review and approval.	Ongoing.

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

Risks, obligations and opportunities

- Finalise procurement 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.
- Improve the supplier self-assessment questionnaire process using the new software.
- Implement any requirements arising from amendments to the Modern Slavery Act 2018 (Cth).
- 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.

Implementation

- Commence implementation of three year roadmap.
- Adopt as appropriate elements of the Guidance on Reasonable Steps from the NSW Anti-Slavery Commissioner, including model tender and contract clauses.
- Develop a modern slavery training plan identifying skills needs, including for induction training, and implement.
- Update our websites to share relevant resources, including modern slavery training, with suppliers.
- Finalise reclassification of supplier data.

Monitoring and remediation

- Explore ways to better promote disclosure and remediation mechanisms, particularly to higher tier suppliers.
- Conduct supplier audits with the type and number to be based on risk.

APPENDIX 1

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)	Understanding our modern slavery risks	9-11
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	12-17
Describe how the reporting entity assesses the effectiveness of these actions	s16(1)(e)	Tracking our progress and future commitments	18-19
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	18-19

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

