26 June 2026

CLARKE ENERGY (AUSTRALIA) PTY LTD – MODERN SLAVERY STATEMENT 2025

1. INTRODUCTION

Clarke Energy (Australia) Pty Ltd ABN 20 086 492 935 of registered office 40-46 West Thebarton Road, Thebarton 5031 South Australia (**Clarke Energy Australia**) is the reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)* (the **Act**). Clarke Energy Australia is a wholly-owned subsidiary of Clarke Energy Limited (UK Company number 01341453) (**Clarke Energy**).

The **attached** *Slavery and Human Trafficking Statement 2026* (the **UK Statement**) is prepared by Clarke Energy and is to be read together with this covering statement, as the modern slavery statement submitted by Clarke Energy Australia.

Clarke Energy Australia does not own or control any other entity.

2. STRUCTURE, OPERATIONS & SUPPLY CHAIN

Clarke Energy Australia is the Australian subsidiary of a global business specialising in the engineering, installation, and long-term maintenance of distributed energy solutions. From single gas engines to full turnkey power plants and microgrids, Clarke Energy Australia delivers EPC project delivery and long-term service support for hybrid systems incorporating high-efficiency gas engines, battery energy storage, and diesel generation.

Clarke Energy Australia employs approximately 150 employees, with fluctuations depending on the life-cycle of major projects. It operates under 5 primary divisions, including Commercial, Construction, Engineering, Finance and Sales. Our employees are located across Australia and New Zealand, with its corporate office located in Thebarton in Adelaide.

Revenue in 2025 was comprised primarily from construction activities (including full engineering, procurement and construction (EPC)), maintenance and service activities, and sale of goods.

Clarke Energy Australia's supply chain is primarily located in Australia, Austria, France, New Zealand and the United States. Its supply chains include suppliers of gas and diesel engines; mechanical and electrical componentry (including switchboards) and technical services; construction and building supplies and services; maritime, ground and air freight services; and related ancillary goods and services.

3. RISKS OF MODERN SLAVERY IN OPERATIONS & SUPPLY CHAIN

Clarke Energy Australia has assessed modern slavery risks across its operations and supply chain, considering geographic location, industry and service type.

Its operations are primarily in Australia and New Zealand, both classified as low-risk jurisdictions under the Walk Free Global Slavery Index. Key suppliers are based in Australia, Austria, France and the United States, which are also considered low-risk countries. Accordingly, Clarke Energy Australia considers its overall risk of causing, contributing to, or being directly linked to modern slavery to be relatively low.

This assessment is supported by supplier due diligence and audit outcomes (refer Section 4 below).

However, risks may still arise indirectly through extended supply chains, particularly where suppliers source goods or services from higher-risk jurisdictions or operate in higher-risk industries, including those involving temporary or migrant labour. Clarke Energy Australia continues to monitor these risks with reference to recognised indices and evolving supply chain insights.

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ABN 20 086 492 935

4. ACTION TAKEN BY CLARKE ENERGY AUSTRALIA TO ASSESS AND ADDRESS MODERN SLAVERY RISK

Clarke Energy Australia adopts a group-wide approach aligned with Clarke Energy, supported by policies and procedures designed to identify, prevent, and manage modern slavery risks. These are reviewed regularly.

All new suppliers undergo an onboarding process under the Contractor-Supplier Management procedure, which requires disclosure of business practices and confirmation of compliance with modern slavery obligations, including alignment with Clarke Energy policies where suppliers do not have their own. Supplier information is reviewed periodically.

Contractual controls further reinforce compliance. Standard purchasing terms require suppliers to comply with the Modern Slavery Act and report any suspected or actual modern slavery practices. Similar obligations in customer contracts provide additional oversight.

During the reporting period, Clarke Energy Australia undertook a supplier review, including risk-based categorisation, desktop analysis of publicly available information, and targeted questionnaires. Approximately 140 suppliers responded (just over 50%). No respondents reported known modern slavery risks.

Key findings included:

- Over 60% conduct supplier due diligence
- Over 50% have designated modern slavery responsibilities
- Around 75% monitor beyond Tier 1 suppliers
- Nearly 80% maintain relevant internal policies

These findings support a relatively low risk profile across the supply chain.

Employees also complete annual training to build awareness and support identification of potential risks.

5. ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS TAKEN BY CLARKE ENERGY AUSTRALIA

Clarke Energy Australia evaluates the effectiveness of its approach through supplier reviews, policy compliance and employee training. Continuous improvement remains a priority.

The 2025 supplier audit confirmed a low risk profile but highlighted opportunities to enhance the depth and targeting of supplier assessments. In particular, more focused, risk-based review of certain supplier categories and supply chain tiers has been identified as an area where future work can occur.

Training effectiveness is also being refined, with greater emphasis on practical, case-based learning to improve risk identification.

Clarke Energy Australia acknowledges that modern slavery risks may still exist despite current controls and is committed to ongoing improvement. Planned enhancements include:

- Increasing focus on higher-risk industries and locations
- Improving visibility beyond Tier 1 suppliers
- Strengthening integrity of supplier evaluation process.

The Board and senior management remain committed to strengthening the effectiveness of these measures over time.

This statement was approved by the board of Clarke Energy (Australia) Pty Ltd in its capacity as principal governing body on 26 June 2026.

This statement is signed by Leanne McClurg in her role as the Commercial Director of Clarke Energy (Australia) on 26 June 2026.



Leanne McClurg
Commercial Director
Clarke Energy (Australia) Pty Ltd

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Slavery and Human Trafficking Statement 2026

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1. Modern Slavery

Modern Slavery is an umbrella term that encompasses slavery, forced labour, servitude and human trafficking. It is a crime and a violation of fundamental human rights. Under the UK Modern Slavery Act 2015, businesses are required to report on what actions they have taken to ensure there is no modern slavery within their supply chains and business operations.

Clarke Energy has a zero-tolerance approach to slavery and human trafficking and opposes all forms of human rights abuse. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain.

2. Our Business

Clarke Energy is a multinational specialist in distributed power generation solutions. Our international headquarters are located in Knowsley, near Liverpool in the United Kingdom. Our capabilities range from the supply of a gas fueled power generation engine, through to the turnkey installation of a multi-technology power plant (including renewables). Clarke Energy is an authorised distributor and service provider for INNIO Jenbacher reciprocating gas engines with a strong focus on aftersales support. Clarke Energy's relationship with Jenbacher and in-country resources gives us an ability to provide unparalleled service and maintenance, along with local supply of original equipment manufacturer approved spare parts.

Clarke Energy is part of Rehlko, a global energy resilience business which is majority owned and controlled by Platinum Equity.

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3. Due Diligence

We consider comprehensive and robust internal and external due diligence a key part of our modern slavery risk assessment framework in helping us to understand, identify and manage potential modern slavery risks for our business. To that end, we only work with suppliers who have completed our rigorous on-boarding process and have provided information in relation to their own position on slavery and human trafficking where applicable.

3.1. Labour Force

Clarke Energy employs circa 450 people in the UK and Ireland and circa 1400 people globally. We understand that the risk of modern slavery in labour forces is high. Our human resources team ensure that all our employees are subject to various and stringent human resources processes to ensure a right to work. We treat all our employees with equality and respect and ensure, among other things that: (i) working hours comply with relevant national laws; (ii) our employees are remunerated with wages and benefits set at or above local minimum wage requirements; and (iii) our working conditions meet the standards of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR). We therefore expect and require our suppliers to demonstrate the same level of commitment with the existence of processes and procedures to ensure our high standards are met.

3.2. Our Business Operations & Supply Chains

We operate in c. 28 countries around the world. We conduct a risk assessment of every country we operate in or source our goods from. We found that whilst we operate in countries which are deemed to be high risk countries of modern slavery we do not manufacture or distribute goods which, according to the Global Slavery Index, are at heightened risk of modern slavery. We do however source high risk goods from indirect suppliers such as laptops, computers and mobile phones, along with garments in the form of workwear for our employee and business needs.

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We have therefore conducted audits and assessed our suppliers to satisfy ourselves that they meet our strict criteria and that they are taking a proactive approach to ensure there is no modern slavery occurring in any part of their supply chain.

4. Our Policies

All of our employees, suppliers, contractors and sub-contractors must adhere to all of our policies relevant to modern slavery, including our Ethical Procurement Policy and our Anti-Slavery and Human Trafficking Policy. All of our company policies are reviewed annually or when there are changes in legislation, regulations or best practice guidelines, to ensure they are effective.

5. Training

All new employees are trained with respect to modern slavery on induction to the company, and all UK based employees are provided with modern slavery training on a recurring basis. Further to our commitments in previous reports, we strengthened our employee training by offering more in-depth training to relevant employees who will continue to receive this training annually. As part of Rehlko., all of our employees are also required to complete ethics training periodically.

We actively encourage our employees, in line with our whistleblowing policy and the Rehlko Ethics Helpline, that should they have any genuine concerns of modern slavery or human rights abuses within our supply chain or our labour force, they should report their suspicions immediately for further investigation. Even if an employee is mistaken with their suspicions, we are fully committed to supporting our employees and ensuring they are treated fairly with no repercussions.

6. Supplier Audits

Modern slavery questions are included within our supplier audits which involve going onsite to meet and assess certain suppliers, against a range of criteria including their processes and procedures on modern slavery. Whilst our smaller suppliers are exempt from the

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reporting requirements of modern slavery, we hope that by bringing an awareness to this issue and the many forms which modern slavery encompasses, we can assist in ensuring that any potential risk of modern slavery will be reduced.

7. Reports of Modern Slavery

We have not received any complaints or reports in relation to modern slavery within our business operations or throughout our supply chain.

This statement has been approved by the board of directors of Clarke Energy Limited as the parent company of the Clarke Energy group of companies. This statement is made in respect of Clarke Energy Limited together with all of its subsidiary undertakings from time to time and is made pursuant to section 54(1) of the Modern Slavery Act 2015, section 16(1) of the Australian Modern Slavery Act 2018 and constitutes the Clarke Energy Group's Slavery and Human Trafficking Statement for the financial year ended 31st December 2025.

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Kyle Quinn | President
Clarke Energy

Date: 28 January 2026