

Attorney-General's Department
Via <https://modernslaveryregister.gov.au>

Date: 24 June 2026

Modern Slavery Statement

Iberdrola Australia Limited – Modern Slavery Statement covering the period
1 January 2025 to 31 December 2025

1. Reporting entity and overview

This is a joint modern slavery statement submitted by Iberdrola Australia Limited (**IAL**) on behalf of the subsidiary entities it owns or controls (collectively, **Iberdrola Australia**). Iberdrola Australia Energy Markets Pty Limited (**IAEM**) is a wholly owned subsidiary of IAL. IAL and IAEM are the only reporting entities required to report in accordance with section 5 of the *Modern Slavery Act 2018* (Cth) within the Iberdrola Australia group.

IAL and IAEM are both indirectly wholly owned subsidiaries of Iberdrola, S.A., which is the parent company of the global Iberdrola group (**Iberdrola Group**). References to “we”, “us” and “our” in this statement are references to Iberdrola Australia.

This statement describes:

- the structure, operations and supply chains of Iberdrola Australia;
- the risks of modern slavery practices in our operations and supply chains;
- the actions we are taking to assess and address these risks, including due diligence and remediation processes;
- our assessment of the effectiveness of these actions;
- the process of consultation with subsidiary entities of IAL; and
- the details of approval by the principal governing body of IAL.

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the Act) with respect to the period 1 January 2025 to 31 December 2025 (the **Reporting Period**).

2. Structure, operations and supply chains

2.1. Our structure

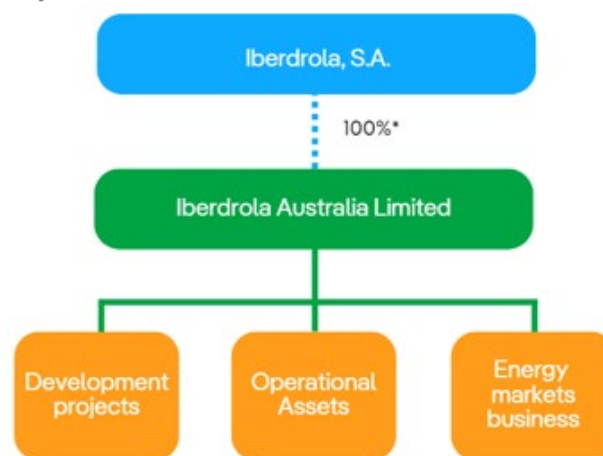
The Iberdrola Group is the world's second-largest utility company by market capitalisation and the largest in Europe.^{1,2} It is globally recognised as a sustainability leader and prides itself on its commitment to an energy model that prioritises the well-being of people and the preservation of the planet. The Iberdrola Group's Governance and Sustainability System, which includes its Code of Conduct for Directors, Professionals and Suppliers, Ethical and Basic Principles of Governance and Sustainability of the Iberdrola Group and Policy on Respect for Human Rights, amongst other key corporate policies, applies to Iberdrola Australia and plays a central role in ensuring the integrity of its business operations. In addition, IAL has adopted an Anti-Modern Slavery Policy covering Iberdrola Australia.

Human rights and modern slavery risks are managed through a coordinated governance approach involving Procurement, Compliance and Sustainability functions. These functions work in alignment with Iberdrola Group policies and procedures, ensuring consistent implementation of due diligence processes across the organisation. Coordination with Iberdrola Group supports the continuous improvement of risk identification and mitigation practices. Iberdrola Australia's Anti-Modern Slavery Policy is published on our company website.

IAL is an Australian public company originally incorporated in June 2003. IAEM is a wholly owned subsidiary of IAL. IAL is incorporated in Australia and is the Australian parent entity of a number of subsidiary entities it owns or controls through which it holds its energy generation and development assets, as well as conducting its energy markets business through IAEM.

Over the Reporting Period, IAL's consolidated revenue was \$857 million and IAEM's consolidated revenue was \$727 million. Our reporting structure is shown in Figure 1.

Figure 1 – Reporting Entity's Structure



Iberdrola Australia Limited is an indirect, wholly owned subsidiary within the Iberdrola Group, with the parent company of the group being Iberdrola, S.A. based in Spain.

1. Iberdrola, <https://www.iberdrola.com/about-us>

2. Walk Free's Global Slavery Index country study of Australia: <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

2.2 Our operations

Iberdrola Australia develops, constructs and operates renewable energy facilities that generate renewable electricity. We also source renewable energy from third parties where we contract to purchase their output under Power Purchase Agreements. With more than 2.5GW total installed capacity (including those under construction) in SA, NSW, VIC, WA and QLD, it is one of the largest renewable energy fleets in Australia.

Because renewable energy is inherently intermittent, and customers need electricity on demand, Iberdrola Australia utilises its additional fast-start (firming) assets to manage intermittency risks. By combining a diversified fleet of renewable generators with a portfolio of flexible, fast-start assets, we provide customers with firm supplies of clean energy in Australia.

As of 31 December 2025, Iberdrola Australia employed over 260 staff located across Sydney, Melbourne, Brisbane and regional towns including staff working on construction of the Broadsound assets and staff at our operational sites in NSW, SA and WA.

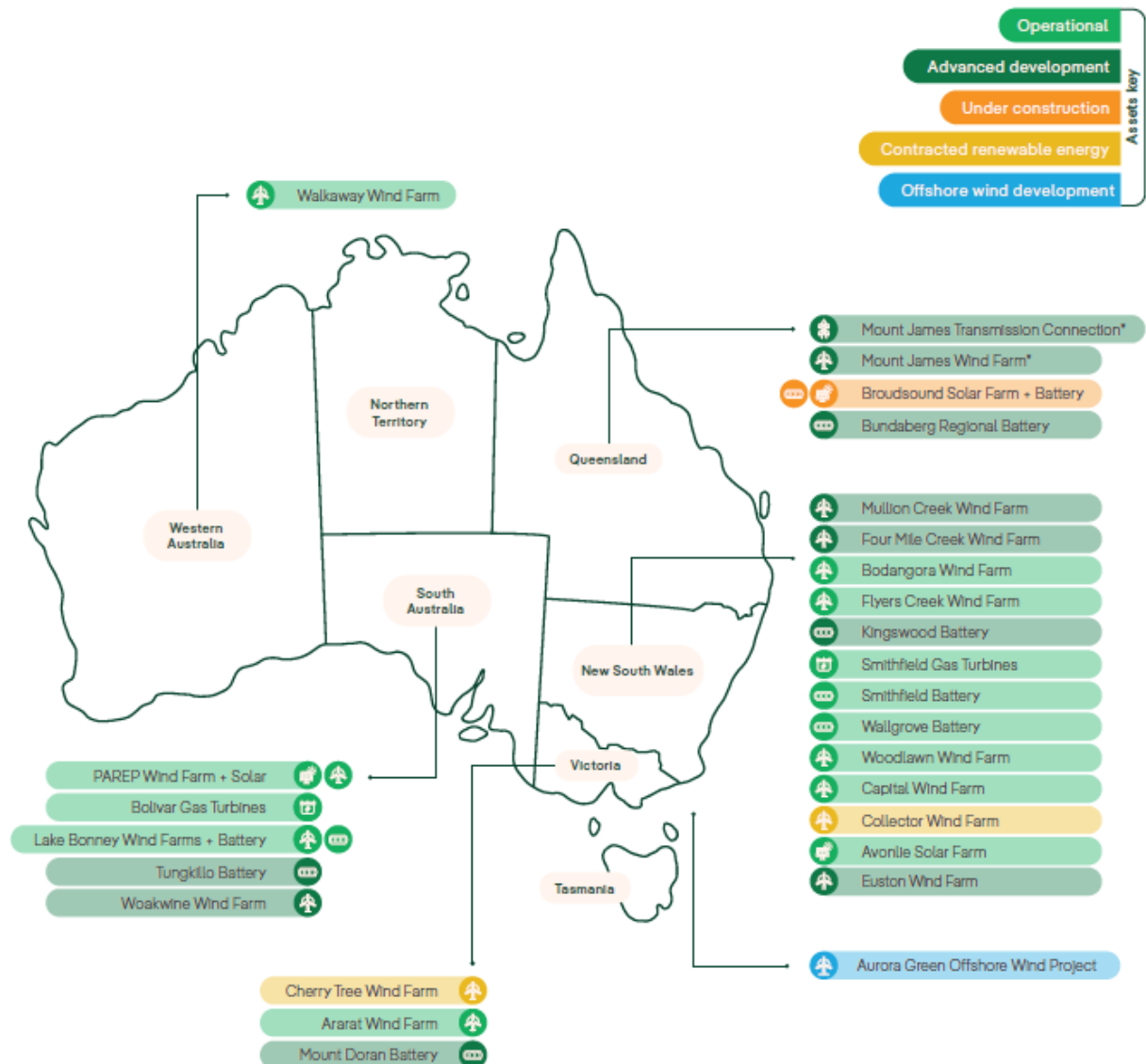
During the Reporting Period, construction progressed on the Broadsound Solar Farm and Battery, 150 Km north-west of Rockhampton in QLD. When complete, the project will have an installed capacity of up to 377 megawatts (MW) for the solar farm, and 180MW (2-hour) for the Battery Energy Storage System.

Acquisition of the 242MW Ararat Wind Farm in Victoria was progressed during the Reporting Period with acquisition finalised in March 2026 (after this Reporting Period).

In November 2025, Iberdrola Australia was selected as the development partner for the Victorian section of the Victoria to NSW Interconnector West (VNI West) transmission project. VNI West is a planned 240km, 500 kilovolt (kV) double-circuit transmission line that will link Victoria's Western Renewables Link with Project EnergyConnect in NSW.

The location of our assets (as at June 2026) is shown in Figure 2.

Figure 2: Location of Iberdrola Australia's Assets



* Mount James Wind Farm and Transmission Connection are currently owned by North Queensland Renewable Energy Zone Pty Ltd (NQREZ) and are being co-developed by Iberdrola Australia and NQREZ.

2.3 Our supply chains

The products and services Iberdrola Australia uses to contribute to our own products and services include:

- power generation and storage technology, such as wind turbines, solar panels, batteries, gas turbines and the various civil, structural, mechanical and electrical components that comprise a generation or energy storage facility;
- services for the development, construction and maintenance of power generation and storage facilities such as the design, construction, procurement, installation, testing and commissioning; and

- products and services to support Iberdrola Australia's operations (e.g., information technology, office management, business management etc.).

The various suppliers, contractors, consultants and other service providers within Iberdrola Australia's supply chain also procure their own products and services from their own supply chains. Combining our direct and indirect supply chains results in a global supply chain footprint.

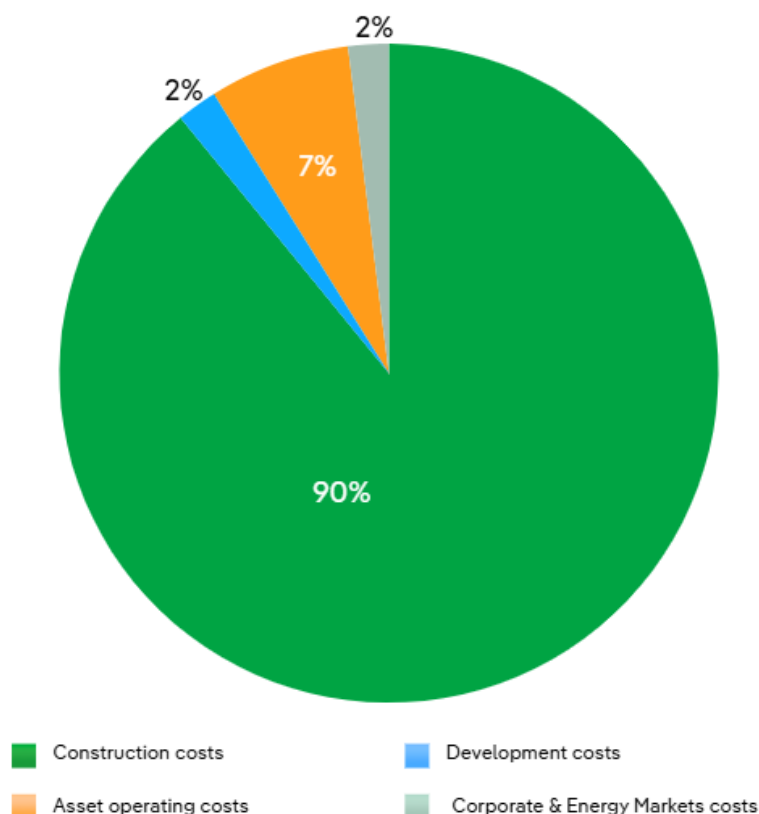
The majority of the products we purchase are sourced from European countries and China, while most services are sourced from within Australia. The contractual arrangements within the Iberdrola Australia supply chain varies from, for example, small consultancy agreements through to larger transactions, such as Turbine Supply Contracts.

The sourcing and purchasing of all products and services from our direct suppliers is led by the relevant team within the business in line with Iberdrola Australia's compliance and governance standards. Depending on the business need, suppliers are engaged on either an ad hoc basis or under longer-term contractual arrangements, sometimes just on one project and sometimes across a range of projects.

Iberdrola Australia continues to strengthen its visibility across its supply chain by progressively extending due diligence processes beyond Tier 1 suppliers (i.e. direct suppliers), including enhanced mapping and risk assessment of Tier 2 suppliers (i.e. indirect suppliers who supply to Tier 1 suppliers) and Tier 3 suppliers (i.e. suppliers of raw materials to Tier 2 suppliers) where relevant.

The expenditure profile across our operations and supply chain for 2025 is shown in Figure 3 below.

Figure 3: Iberdrola Australia's 2025 expenditure profile



3. Risks of modern slavery practices in our operations and supply chains

Iberdrola Australia's operations are limited to Australia. According to the Walk Free Global Slavery Index, Australia is a country considered low risk and among the least vulnerable countries to modern slavery in the Asia Pacific region, and globally.² However, exposure to the risk of modern slavery occurs through the importation of goods and forced labour in the supply chain. Another area of vulnerability exists in the use of temporary migrant workers and the systemic discrimination towards migrants and minority groups.

Aspects of our activities including the operation and maintenance of electricity generation and firming assets are outsourced to service providers under long-term contracts. During the Reporting Period, our staff were also largely office-based, with only 13 staff based permanently at our operational assets. Most of our staff are employed directly and are on permanent contracts in skilled roles. This minimises the modern slavery risks within the Iberdrola Australia workforce.

Due to the nature of supply chain engagement across our operations, products and services, we have also considered whether there is a risk that we may be directly linked to modern slavery practices. We engage a substantial supply chain for the supply of parts, services, equipment and labour, particularly for the construction of energy and storage projects, and these suppliers in turn also engage many different tiers of supplier including through to raw material extraction. We conducted a risk assessment of our Tier 1 suppliers against the key risk indicators and identified the following potential risk areas.

3.1. Sector and industry risks

Iberdrola Australia procures construction services from civil and electrical contractors who may employ temporary or contract workers to construct our energy projects.

The Walk Free Global Slavery Index 2023 identified the Australian construction sector as one of the high-risk sectors for modern slavery, particularly in relation to forced labour exploitation. This risk is largely attributed to the sector's reliance on migrant workers, many of whom enter Australia through temporary visa programs.

3.2. Geographic, product and services risks

Iberdrola Australia procures equipment (such as wind turbines, solar panels and large electrical components, as well as IT equipment such as laptops, computers and mobile phones) from a small number of global suppliers who may source, manufacture, or assemble these items (and the materials that comprise them) in countries considered higher risk under the Walk Free Global Slavery Index.^{3,4}

3. Refer to: <https://www.walkfree.org/global-slavery-index/2018/findings/country-studies/australia/>

4. The Global Slavery Index is a ranking of the number of people in modern slavery, including in the hardest to access countries. Refer to: <https://www.walkfree.org/global-slavery-index/>

The importation of electronics is listed as a risk of modern slavery to Australia by Walk Free's Global Survey Index country study with China and Malaysia being the key source countries. China and Malaysia have large electronics manufacturing industries which have been identified as a potential risk of using modern slavery practices in the production of these goods.⁵

Iberdrola Australia is aware of the modern slavery implications in the manufacturing of solar modules in the Xinjiang region in China. There are claims that Uyghur Muslims are victims of some form of forced labour in the production of polysilicon that is a key material for solar panels. The world's four biggest manufacturers of polysilicon are implicated in the allegations and the major panel suppliers in the world source polysilicon from at least one of them.^{6,7}

Accordingly, there is a risk that Australian businesses may purchase solar panels from a panel manufacturer that sources polysilicon from this location. This particular risk is linked to the purchase of elements for photovoltaic plants in a complex context that prevents traceability. To identify the origin of the materials and the components of the solar modules and in particular, the polysilicon, Iberdrola Group continues to implement measures and is seeking to increase the visibility of suppliers in relation to forced labour risks and the use of polysilicon or other components purchased in China.

The Iberdrola Group, including Iberdrola Australia, is working on different avenues to minimise this risk, including the possibility of carrying out site audits and the study of component traceability mechanisms, as well as participating in the sector initiatives.

Although the circumstances in the region make it very difficult to adopt due diligence measures to ensure responsible management of human rights risks, in relation to large-scale solar panel procurement, to identify the origin of the materials and components of solar modules (in particular, polysilicon), the Iberdrola Group, including Iberdrola Australia, continues to implement the following measures:

- Explicit declarations from suppliers rejecting forced labour, in addition to acceptance of the Iberdrola Code of Conduct for Directors, Professionals and Suppliers and Iberdrola Group policies.
- Seek confirmation by suppliers as to whether they use polysilicon or other components originating from the Xinjiang province.
- Implement traceability mechanisms and tools aimed at enabling visibility over the origin of key materials and components incorporated into solar panels, particularly polysilicon.
- Request for the codes of conduct and ethics that suppliers apply to their company and suppliers, including their grievance mechanisms and communication channels available to workers and stakeholders across the supply chain.
- By year-end 2025, a total of 160 social and sustainability audits had been conducted on the Group's main Tier 1 suppliers at the global level. Participation in industry initiatives aimed at improving transparency and addressing forced labour risks in high-risk sectors such as solar, including the Solar Stewardship Initiative (SSI), which has developed ESG and traceability standards for the solar value chain, with a particular focus on enabling end-to-end traceability of polysilicon. Main solar Chinese manufacturers were audited under these standards.

5. See n.2 above.

6. Refer to: <https://www.walkfree.org/global-slavery-index/2018/findings/country-studies/australia/>

7. Murphy, L. and Elimä, N. (2021), "In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains." Sheffield, UK: Sheffield Hallam University Helena Kennedy Centre for International Justice.

3.3. Entity risks

Iberdrola Australia's growth plans will result in new suppliers being engaged for our operations and services. Although our prequalification and onboarding processes are thorough, we recognise the risk still remains that these processes may not appropriately assess the risk of our suppliers and their approach to modern slavery practices, particularly with any new risks that have not been apparent in the industry. To monitor and manage these risks, Iberdrola Group continue to strengthen its Supply Chain Human Rights Due Diligence System which is described further in Part 4 below.

4. Actions taken to assess and address these risks

4.1. Actions completed

Iberdrola Australia has undertaken the following actions in the Reporting Period:

Strategic approach and Governance

- The Purchasing Division has included among its priorities to continue with its ambitious multi-year objective to strengthening the Human Rights and Environmental Due Diligence processes across the supply chain, aligned with Iberdrola Group's Governance and Sustainability System and international standards such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, and is embedded into procurement and supplier management processes.
- Ongoing liaison with Iberdrola Group in the implementation of specific modern slavery considerations in the supplier evaluation model, questionnaires and risk assessments.
- Establishment at Iberdrola Group, a multi-disciplinary working group to monitor forced labour risks in the solar panel supply chain, with an extended scope covering other main equipment categories.
- Renewal of the Iberdrola Group's Sustainable Purchasing Strategy certification by AENOR, in recognition of the promotion of sustainability throughout the company's supply chain. The AENOR certification (Asociación Española de Normalización y Certificación) certifies that purchasing processes by the company are carried out to have the greatest positive environmental, social and economic impact throughout the lifecycle of the service of product.

Due diligence framework and implementation

- Implementation of the continuous due diligence framework covering the screening and risk identification, assessment, prioritisation, prevention and mitigation monitoring and, where necessary, remediation of adverse impacts, integrated across the supplier lifecycle (including onboarding, classification, contracting, monitoring and evaluation), and subject to periodic review.
- Updated the "Guide to action and penalties against practices that contravene the Code of Conduct for suppliers".

Supply chain visibility and risk identification

- Enhancement of supply chain visibility through the adoption of the Prewave platform (<https://www.prewave.com/>) to support Tier 2 and Tier 3 supplier mapping for critical Tier 1 suppliers, and to strengthen risk identification processes across the extended supply chain and assess their integration into procurement.

Audits and control mechanisms

- Continued implementation of social and sustainability audits at Group level as part of its ongoing due diligence processes, with a focus on higher-risk suppliers and categories. During 2025, a total of 42 audits were conducted on main Tier-1 suppliers, including two suppliers based in Australia.
- Completion, in 2025, of a pilot initiative to reinforce our due diligence processes, including four social audits conducted on Tier-2 and Tier-3 Chinese suppliers associated with a global Tier-1 supplier, in accordance with the SMETA (SEDEX) standard.

Contractual controls

- Integration and extension of modern slavery clauses in relevant supplier and service provider contracts, requiring compliance with the latest modern slavery legislation, implementation of appropriate risk management measures, and cooperation with Iberdrola Australia to mitigate modern slavery risks. During the Reporting Period, clauses were extended to additional critical equipment contracts.

Engagement and external alignment

- Ongoing participation in the Clean Energy Council's Risks of Modern Slavery Working Group.

Internal capabilities

- Strengthening of local procurement capabilities through the allocation of additional resources to coordinate the pre-qualification due diligence processes of new and existing suppliers.
- Reinforcement of internal capabilities through training and awareness initiatives, including human rights training for employees aimed at improving the identification and management of supply chain human rights risks.

Supplier risk management processes consider multiple risk factors, including geographic exposure, sectoral risk, product or commodity characteristics, and potential links to adverse human rights impacts. This enables Iberdrola to prioritise higher-risk suppliers and apply enhanced due diligence measures where appropriate, including progressively extending the analysis beyond direct suppliers.

4.2. Future actions

During the next reporting period, Iberdrola Australia intends to implement several initiatives to further strengthen its modern slavery policy and procedures. Future actions include:

- Continue to work with industry as a member of the Risks of Modern Slavery Working Group within the Clean Energy Council to advance industry efforts for continuous improvement addressing modern slavery issues;
- Refresh employee training and awareness on modern slavery risks and what it means for Iberdrola Australia, particularly considering ongoing employee growth; and
- Continuation of social and sustainability audits for Iberdrola Australia suppliers, with a focus on identifying and addressing potential modern slavery risks.

At the Group level, Iberdrola introduced in 2024 a specific objective aimed at addressing modern slavery risks: *Reinforcing Supply Chain Human Rights Due Diligence System*. This comprehensive multi-year program is designed to reinforce the Supply Chain Human Rights Due Diligence processes.

During 2026, initiatives launched in 2025 will be consolidated, and the overall plan will be reviewed. Planned actions include:

1. Standardise the methodology used to assign Human Rights risk level to suppliers, based on various criteria.
2. Establish differentiated management approaches for suppliers according to the level of risk identified.
3. Continuous improvement in the methodology used in the development of Sustainability Audits, promoting coverage of suppliers with high risk in Human Rights; reinforcing the audit checklist to reinforce the Human Rights aspects.
4. Review and standardise contractual clauses on Human Rights/Forced Labour for main equipment suppliers, including enhanced disclosure requirements about Tier-n suppliers for certain critical contracts.
5. Expansion of the Prewave platform to support Tier 2 and Tier 3 supplier mapping for critical Tier 1 suppliers, strengthening risk identification across extended supply chains and supporting its integration into procurement processes.
6. Continued implementation of social audits on Tier-1, but also Tier-2 and Tier-3 suppliers associated with critical global Tier-1 suppliers.

Iberdrola Australia will continue to liaise with our counterparts across the Iberdrola Group about this action plan to: (a) foster collaboration; (b) learn from their experiences; and (c) leverage procedures and processes that we may be able to use in Australia.

5. Assessing effectiveness

The measures taken during the Reporting Period to assess the effectiveness of the steps taken to address the risk of modern slavery practices in our operations and supply chains included the following:

- Ongoing monitoring and internal reviews of due diligence processes, including suppliers screening, adverse media analysis, social and sustainability audit standards, evaluation of supplier audit outcomes, and monitoring of key performance indicators.
- Structured engagement with Iberdrola Group functions to support knowledge sharing and enable the evaluation and refinement of existing due diligence processes.
- Alignment with industry best practices through active participation in global sectoral initiatives, such as Solar Stewardship Initiative.
- Actively participating in Australia's peak renewables body, the Clean Energy Council, through its Risks of Modern Slavery Working Group to ensure that we are informed of developments in identifying and addressing the risks of modern slavery in the supply chain; and ensure our processes and procedures are in line with industry best practices.

6. Consultation and approval

Iberdrola Australia employees manage and operate all entities that IAL own or control, including IAEM. Consultation with these entities is undertaken by ongoing internal communication.

Senior management of IAL and IAEM, and Iberdrola Group were consulted and involved in the preparation of this joint statement.

**The Board of Directors of Iberdrola Australia Limited
approved this statement on 24 June 2026.**



Paul Simshauser
Chief Executive Officer
Iberdrola Australia