

An aerial photograph of a river with clear, turquoise water flowing over a rocky bed. The banks are covered in dense green trees and shrubs. The image is framed by a thin teal border.

Modern Slavery Statement

JUNE 2022

The ENGIE logo, featuring a white curved line above the word "ENGIE" in a white, sans-serif font.

ENGIE



Acknowledgement of Country

We respect and honour First Nations Elders past, present and future.

We acknowledge the stories, traditions and living cultures of First Nations Peoples on the lands on which our sites are located and commit to building a brighter future together.



CEO Message

2021 Modern Slavery Statement ENGIE Australia & New Zealand

I present ENGIE Australia & New Zealand's (ENGIE ANZ) modern slavery statement for 2021. This is our second statement under the Modern Slavery Act 2018 (Cth) and I am pleased to share the important progress we have made in maturing our processes and capability to manage risks of modern slavery practices in our operations and supply chains since our last statement.

In 2021, we continued to advance the priority areas in our forward-looking plans. We focused on refining, strengthening and further embedding our supplier due diligence and onboarding processes across the business, expanding our capacity building initiatives for key personnel, enhancing the awareness campaigns and training opportunities available to our team members, building up our ability to provide support for victims, and in our high-risk area of call centre operations in the Philippines, engaging an internal resource to monitor and audit supplier performance on the ground against our expectations and requirements.

We know the nature of our business in accelerating our customers' transition to carbon neutrality through our low-carbon electricity assets and our expertise in smart infrastructure exposes us to risks of modern slavery practices. We continue to dedicate

ourselves to playing our part in eradicating such risks and remain steadfast in building our internal capability and engagement with our valued suppliers and business partners and other stakeholders as the bedrock to realising this.

While we have made headway, we still have a way to go. We know the complexity of this important issue requires our joint efforts and our team looks forward to working collaboratively with our valued suppliers, business partners and other stakeholders to continue our collective progress to eradicating such risks.

Andrew Hyland
Chief Executive Officer
ENGIE Australia & New Zealand



Introduction

Reporting Entities and Controlled Entities

This joint modern slavery statement has been prepared by International Power (Australia) Holdings Pty Limited ABN 70 105 041 209 (**IPAH**) for the 2021 calendar year (**2021 reporting period**) in line with section 14(1) of the Modern Slavery Act 2018 (Cth) (**MSA**) in respect of itself and the following reporting entities:

1. International Power (Australia) Holdings 2 Pty Limited ACN 105 041 307 (**IPAH2**);
2. International Power (Retail) Pty Limited ABN 18 107 548 854;
3. Simply Energy ABN 67 269 241 237 (a partnership comprising IPower Pty Limited ACN 111 267 228 and IPower 2 Pty Limited ABN 24 070 374 293); and
4. Pelican Point Power Limited ABN 11 086 411 814.

The above entities (including IPAH) are reporting entities for the purposes of section 5 of the MSA (**reporting entities**). In addressing the mandatory

criteria as required by section 16 of the MSA, this modern slavery statement also covers the risks of modern slavery practices in the operations and supply chains of the entities owned and controlled by the reporting entities, and the actions taken by those entities (including the non-controlled entities as at the date of this statement) to assess and address those risks.

Following the global group's announcement of the sale of EQUANS in 2021, EQUANS and its operations and supply chains have been excluded from consideration in this modern slavery statement.¹ A full list of the entities owned and controlled by the reporting entities (**controlled entities**) is set out in Appendix A. A full list of the entities owned but not controlled by the reporting entities (**non-controlled entities**) is set out in Appendix B.

MANDATORY CRITERIA	MSA REFERENCES	PAGE REFERENCES
Consultation process between reporting entities, controlled entities and entity giving modern slavery statement	14(2)(c) 16(1)(f)	5
Approval of modern slavery statement	14(2)(d) 16(2)(b)	5
Signing of modern slavery statement	14(2)(e)	3
Identification of reporting entities	16(1)(a)	4, Appendix A, Appendix B
Description of structure, operations, and supply chains	16(1)(b)	6, 7, 8
Description of risks of modern slavery practices in operations and supply chains	16(1)(c)	9, 10
Description of actions taken to assess and address risks of modern slavery practices	16(1)(d)	11, 12
Description of how effectiveness of actions taken to assess and address risks of modern slavery practices are assessed	16(1)(e)	13
Other relevant information	16(1)(g)	14

¹ For the 2021 reporting period onwards, EQUANS will manage its obligations (if any) under the Modern Slavery Act 2018 (Cth) on a stand-alone basis.

Consultation Process

IPAH is ultimately owned by ENGIE S.A. (**ENGIE**) (72%) and Mitsui & Co., Ltd. (28%) and is the Australian holding company of the IPAH Group. The IPAH Group is constituted by IPAH and its controlled entities which includes all reporting entities and their controlled entities.

The members of the IPAH Group operate under common direction and governance and are subject to the same policies, procedures and processes concerning their obligations under the MSA (**modern slavery obligations**). The consultation process for the purposes of preparing this modern slavery statement principally relied upon IPAH receiving inputs from key functional business units operating across the IPAH Group including human resources, procurement, finance, regulation, compliance, sustainability, legal, ethics and corporate affairs. Where higher risks of modern slavery practices were identified in specific operations or supply chains, representatives of entities or functional business units impacted by these risks were also engaged. The company secretaries of the reporting entities were also involved throughout the process. The continual dialogue was done under the guidance of a modern slavery committee co-chaired by the Head of Procurement and Sustainable Procurement and the Compliance & Sustainability Manager which met regularly throughout the 2021 reporting period. This approach ensured a consistent response across the Group. Finally, the senior leadership team of the IPAH Group with responsibility and accountability for modern slavery obligations also reviewed and approved this modern slavery statement.

Approval of Modern Slavery Statement

This modern slavery statement was approved by the board of directors of International Power (Australia) Holdings Pty Limited ABN 70 105 041 209 (**IPAH**) on 22 June 2022 (including as a higher entity (as defined in the MSA) for IPAH2, International Power (Retail) Pty Limited, Simply Energy and Pelican Point Power Limited) and has been signed by Andrew Hyland, as a director and responsible member of the board of IPAH.



Key Highlights for the 2021 Reporting Period

The key highlights for this 2021 reporting period are set out below:



we refined our self-assessment questionnaire for our energy management trading suppliers



we extended our independent third-party assessments for all suppliers before proceeding to contract



we engaged an internal ENGIE resource in our high-risk call centre operations in the Philippines to monitor and audit supplier performance



we extended the training opportunities available to our team members



we expanded the membership of our modern slavery committee



we enhanced the capacity of our key personnel



we built upon measures to assist victims with remedies

Our Structure, Operations and Supply Chains

Structure

The structure of each reporting entity is set out in Appendix A and Appendix B.

Operations

ENGIE ANZ's vision is to accelerate and support our customers' transition to carbon neutrality by providing innovative sustainable energy solutions to households, businesses, communities and cities in Australia and New Zealand through our portfolio of low-carbon electricity assets and our expertise in smart infrastructure.

The IPAH Group's operations are diverse and cover the following activities in pursuit of ENGIE ANZ's vision:

1. Power Station Ownership and Operation and Associated Electricity Support Services

The IPAH Group owns and operates several low emissions (mainly gas) power stations in South Australia and, up until December 2021, Western Australia. This includes the Pelican Point Power Station, which is owned by Pelican Point Power

Limited, a reporting entity. Pelican Point Power Limited is also the employing entity for its power station staff. These power stations (excluding the Kwinana Cogeneration Plant in Western Australia) provide electricity to the National Electricity Market (**NEM**) while some also provide electricity support services to the NEM and transmission network service providers.

The Kwinana Cogeneration Plant (**Plant**) provided electricity to the Wholesale Electricity Market (**WEM**), via contractual arrangements with Synergy, and electricity and steam to the BP Refinery in Western Australia, up until December 2021. The partners of the Perth Power Partnership, the owners of the Plant, approved the cessation of operations and the commencement on 1 December 2021 of decommissioning and site rehabilitation works, following the BP Refinery's decision to cease fuel production at the refinery and terminate the Partnership's site lease at the expiry of its electricity and steam offtake arrangements with the Partnership.

Our Structure, Operations and Supply Chains

Operations (continued)

2. Wind Farm Ownership and Operation and Associated Products

The IPAH Group owns the Canunda Wind Farm in South Australia, which has been in operation since 2005. It also developed the Willogoleche Wind Farm in 2019. It now owns 25% of the Willogoleche Wind farm via a renewable equity platform for solar and wind energy investment with its partner, Infrastructure Capital Group (**ICG**). The Canunda and Willogoleche Wind Farms are operated by the Group, via contractual arrangements with third parties. The Willogoleche Wind Farm is also managed by the Group via an asset services agreement. The wind farms provide electricity to the NEM and generate various “green products” such as renewable energy certificates.

3. Solar and Wind Farm Development

The IPAH Group is actively involved in the development of solar and wind farms and currently has three solar sites across Queensland (Gregory and Warhook) and New South Wales (Silverleaf) and one wind site in New South Wales (Hills of Gold) under various stages of development.

4. Energy Retailing - Simply Energy

The IPAH Group owns Simply Energy, a gas and electricity retailer with over 730,000 customers. Simply Energy is a reporting entity and its immediate parent, International Power (Retail) Pty Limited, is also a reporting entity. Simply Energy started providing energy in 2005, and today Simply Energy provides electricity to customers in New South Wales, Queensland, South Australia, and Victoria, plus natural gas to customers in South Australia, Victoria, Western Australia and some areas of NSW. Simply Energy supports its customer base via billing and customer service platforms, third party operated call centre operations located in Australia and the Philippines (previously in South Africa also, which ceased operations in 2021), third party database operations in India, and customer support team members (employed by Simply Energy) located at head office in Melbourne, Australia.

5. Energy Solutions - Simply Energy Solutions

Simply Energy Solutions is a business model, supporting Simply Energy, and is designed to explore selected new goods, services and products

likely to be part of an energy retailer’s future offerings to assess their commercial viability, and if proven successful, to roll-out as a “business as usual” commercial offering by Simply Energy. Simply Energy Solutions is an employing entity.

6. Client Solutions

The IPAH Group houses our client solutions team. This team is focussed on co-creating solutions for precincts and territories to make them smarter, safer, and more efficient by designing the tools, facilities, products and services to do so - going beyond just providing energy. The team aims to deliver positive outcomes in every part of the value chain via its integrative net zero solutions including sustainable energy production and storage, district energy (heating and cooling) and green mobility. The client solutions business transitioned into the IPAH Group during the reporting period following the global group’s decision to sell EQUANS.²

7. Energy Management Services

The IPAH Group also provides energy management services via a dedicated energy management team. In July 2021, the performance of these services was restructured such that a related ENGIE entity outside of the IPAH Group, ENGIE Energy Marketing Australia Pty Ltd (**EEMA**), became the provider of these energy management services and the employer of the dedicated employees. EEMA is part of the global group’s Global Energy Management & Sales (**GEMS**) business unit. EEMA is now responsible, under a contract for services and subject to the IPAH Group’s broader risk appetite, for the commercial optimisation of ENGIE ANZ’s power station assets, its solar and wind farm assets, its retailing operations, and its large business and industrial, and wholesale customer base via considered trading (including physical, renewable, gas, electricity and derivative trading), hedging and risk management strategies. It is also responsible for the provision of expert market analysis to support the optimisation and strategising, as well as the provision of IT, finance, settlement and (some) onboarding services. The IPAH Group retains deal or transactional commodity origination and the remaining onboarding services, together with associated compliance initiatives.

² See page 4 under the heading “Reporting Entities and Controlled Entities” for further detail.

Our Structure, Operations and Supply Chains

Operations (continued)

8. Corporate Services

The IPAH Group provides several corporate services to support its Group entities and various functional business units including the provision of IT applications and infrastructure, legal services, finance and treasury services, lease holdings of corporate offices, and the provision of employees.

Various members of the IPAH Group also engage cleaning and security services in respect of their offices and other sites.

Supply Chains

ENGIE ANZ's diverse operations means a vast and expansive supply chain. In the 2021 reporting period, we spent over \$150 million across approximately 1000 direct suppliers. These figures are lower than reported in our last statement principally due to the exclusion of EQUANS from consideration in this statement.³ These figures also exclude spend arising from ENGIE's energy management activities to supply gas and electricity to homes, businesses, industrials, and other wholesale customers. This spend is managed separately from the general procurement spend by our energy management and retail business units and was approximately \$1.2 billion across all our operations for the 2021 reporting period. We expect this number to dip slightly in 2022 due to the closure of the Kwinana Cogeneration Plant in Western Australia, the full effects of which will only commence to be felt in 2022.

General Procurement Spend

Almost all ENGIE ANZ's annual spend for the 2021 reporting year was with suppliers located in Australia, although in the following categories of supply, our local suppliers provided their services using their overseas operations:

- contact centre operations – Philippines and India: 8% of total spend; and
- IT services – India: 5% of total spend.

Additionally, ENGIE's spend includes goods manufactured overseas, or goods produced in Australia using materials sourced overseas. The key high-risk goods we identified are noted further below.

The key spend categories for the 2021 reporting year were: IT services, contact centre operations, and construction services (including operation and maintenance services).

Energy Management Spend

In the 2021 reporting period, our spend arising from our energy management activities largely involved electricity purchased from the wholesale exchange operated by the Australian Energy Market Operator Limited (**AEMO**), gas purchased from upstream producers and other gas wholesalers such as other retailers (and related services such as distribution and transmission pipeline services), and hedging and risk management goods and services. This involved active trading with, in excess of 47 external counterparties, under various contracting arrangements including power purchase agreements, ISDA derivative trading and various renewable purchase contracts.

³ See page 4 under the heading "Reporting Entities and Controlled Entities" for further detail.
<https://www.maplecroft.com/>

Identifying Risks of Modern Slavery Practices in our Operations and Supply Chains

To identify the risks of modern slavery practices in our operations and supply chains, we followed the same process we undertook for the 2020 reporting period. We identified the goods and services we procure which present an increased risk of exposure to such practices based around well-recognised global indicators including:

- the country or geographical location from which our goods and services are procured;
- the categories of goods and services we procure;
- the sectors or industries from which we procure our goods or services; and
- the businesses or entities from whom we procure our goods or services.

We continued to use a range of well-regarded resources to underpin and inform our understanding of these indicators in the context of our operations and supply chains including the Verisk Maplecroft Indices⁴, the Global Slavery Index⁵, the results of EcoVadis assessments⁶, the results of our supplier self-assessment questionnaires (SAQ) and information available on the Department of Home Affairs website⁷.

Due to the relatively stable nature of our business activities, we continued to be exposed to largely the same type of risks of modern slavery practices as in 2020 (including with respect to the underlying reasons), although the magnitude of the exposure has varied.

For example, the global group's decision in 2021 to sell EQUANS⁸ resulted in the elimination of such risks in the supply of parts and equipment for the fire and electrical divisions and a significant reduction in exposure to such risks in the supply of uniforms to our employees (now largely

confined to team members at our generation assets) and in the use of labour hire services (previously predominantly EQUANS driven).

In addition, we were able to appreciably decrease exposure to such risks in our call centre operations by ceasing operations in South Africa (a high-risk country) and by increasing the level of direct and frequent observations in our call centre in the Philippines (also a high-risk country) via the engagement of an ENGIE resource locally.

And finally, while we entered the decommissioning and site rehabilitation phase at our site in Western Australia with the closure of the Kwinana Cogeneration Plant, our exposure to risks of modern slavery practices due to the uptake in construction related activities remained neutral as we largely employed former employees or used long-standing Australian based contractors known to the business.

These risks are more fully set out in the following table.

⁴ <https://www.maplecroft.com/>

⁵ <https://www.walkfree.org/projects/the-global-slavery-index/>

⁶ <https://ecovadis.com/>

⁷ <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>

⁸ See page 4 under the heading "Reporting Entities and Controlled Entities" for further detail.



Identifying Risks of Modern Slavery Practices in our Operations and Supply Chains (continued)

Modern Slavery Risk Indicators


forced / bonded labour


deceptive recruitment


vulnerable / migrant worker exploitation


high risk country / geographical location


child labour

Call Centre & Database Operations

outsourced call centre and database operations located overseas



Cleaning and Security Services

engagement of cleaners and security personnel to clean and protect office spaces and asset buildings



Construction Industry

involved with construction industry in asset development, various operation and maintenance activities and as part of decommissioning and site rehabilitation works



Electronic Equipment Supply

procurement of laptops, computers, mobile phones and other electronic equipment



Labour Hire Services

engagement of contractors (including highly specialised and technical labour) including via labour hire firms to provide services who further subcontract those services to other contractors



Renewables Industry

involved in the renewables industry in asset development and customer solutions (e.g., solar, wind, batteries, green mobility, net-zero solutions, etc.)



Uniform Supply

procurement of employees' uniforms



Assessing and Addressing Risks of Modern Slavery Practices in Our Operations and Supply Chains

The Steps in the Process

The steps we take to assess and address risks of modern slavery practices in our operations and supply chains are set out below:

Step 1:

we prioritise engagement with our suppliers based on the categories of supply by spend and high-risk levels (**targeted suppliers**)

- we target areas for priority based on our leverage (including contractual) having regard to our levels of spend and closeness of partner relationships

Step 2:

- we engage with our targeted suppliers seeking their self-evaluation of the strength of their own systems and processes to manage the risk of modern slavery practices in their operations and supply chains via a SAQ
- we engage EcoVadis, a third party independent service provider, to conduct assessments of the sustainability practices of our suppliers before contracting or re-contracting, and thereafter, on a periodic basis with our targeted suppliers

Step 3:

- our procurement team (with input from other areas of the business where necessary) evaluates the results of the assessments, including the scorecards generated by EcoVadis
- we seek to address any gaps via improvement plans with our targeted suppliers

Step 4:

- we will evolve our processes for assessing and addressing the risks of modern slavery practices in our operations and supply chains over time as we glean lessons from our initiatives
- we will adapt and refine our processes iteratively to ensure we are responding most effectively to such risks, particularly when acquiring new goods or services, engaging new suppliers (especially suppliers from abroad), venturing into new business ventures, developing new projects or when ceasing operations

Below are the initiatives we undertook in 2021 to mature our processes:

Internal Capability

In 2021, we continued to build up our internal capability to identify, assess, and address risks of modern slavery practices in our operations and supply chains. These efforts underscore the importance we place upon developing and honing such skills regarding them as foundational to the effectiveness of our actions. We did this by:

- expanding the training options available to our team members adding three additional modules of varying depth and complexity and targeting a range of involvement from team members;
- expanding the cross-functionality of our modern slavery committee which now includes team members from key functional areas around the business enabling broader contributions;
- enhancing the capacity of two key personnel by participating in the Clean Energy Council's Risks of Modern Slavery Working Group enabling the benefit of wider (external) experiences in to inform our practices; and
- continually updating our dedicated intranet site as a "go to" resource for team members.

Assessing and Addressing Risks of Modern Slavery Practices in Our Operations and Supply Chains

Supplier Engagement

In 2021, we continued to improve our processes for supplier engagement, which is the key method by which we identify, assess and address risks of modern slavery practices in our operations and supply chains. We did this by:

- refining our SAQ for use by our energy management supplier base. The SAQ was specifically refined for the energy management supplier base to ensure a more targeted questionnaire having regard to the suppliers' specific risk profile. The SAQ is now used by all new suppliers onboarded for the first time and targeted suppliers by spend for existing suppliers. We plan to progressively evolve this process to ensure all suppliers are given an opportunity to engage with us directly and expect the more refined and targeted SAQ will elicit a higher rate of responses;
- expanding the scope of our EcoVadis independent sustainability assessments (which cover modern slavery metrics). We moved from using EcoVadis for high-risk and high spend suppliers during the evaluation phase (i.e., prior to contracting) to using EcoVadis for all suppliers during the evaluation phase. This has given us an opportunity to identify risks of modern slavery practices and opportunities for improvement earlier in the onboarding process and appropriately incentivising our suppliers to align with our expectations before contracting; and
- engaging an ENGIE resource locally in our high-risk call centre operations in the Philippines to monitor and audit supplier performance. In 2021, this involved our resource arranging a survey of agents (including management) of our largest supplier of sales and customer services covering time sheet management, facility information and whistleblower information. A significant portion of agents responded to the survey, with overall results positive, but key findings indicating improvements to the availability of

whistleblower information is needed. Our retail operations team and Simply Energy compliance teams are leading the way in Australia and the Philippines to bridge this gap. The local engagement also enabled us to overcome some of the limitations of the COVID-19 pandemic such as frequent and regular site visits.

Grievance Mechanisms

In 2021, we focussed on bolstering the support we're able to offer victims of modern slavery. Whilst our whistleblowing framework is the principal way of bringing risks of modern slavery practices in our operations and supply chains to our attention (and we are determined to focus more efforts on awareness raising), we worked on understanding the availability of specialised resources in the community to assist victims. We made details of Anti-Slavery Australia and the Australian Red Cross available on our intranet site as points of referral and assistance for victims. This is an area of ongoing focus.



Effectiveness of Our Actions

The following table sets out the categories of activities we have in place to identify, assess, and address risks of modern slavery practices in our operations and supply chains and how we measure the effectiveness of these activities.

NO	CATEGORY OF ACTIVITY	DESCRIPTION OF ACTIVITY	EFFECTIVENESS MEASUREMENT (IN RESPECT OF EACH REPORTING PERIOD)
1	Board Oversight	Regular board updates to ensure adequate oversight.	<ul style="list-style-type: none"> number of board reports regarding modern slavery in line with ENGIE ANZ oversight requirements
2	Modern Slavery Committee	Cross-functional membership of modern slavery committee holding regular meetings to co-ordinate modern slavery initiatives.	<ul style="list-style-type: none"> degree of cross-functional membership number of meetings held
3	Policies and Procedures	Continual review of policies and procedures in line with legislative and ENGIE requirements and plan for reporting period.	<ul style="list-style-type: none"> number of policies and procedures reviewed in line with legislative and ENGIE requirements and plan for reporting period
4	Training	Training opportunities for employees on ethical sourcing and modern slavery.	<ul style="list-style-type: none"> number of training opportunities provided number of employees trained on ethical sourcing and modern slavery
5	Whistleblower Platform	Anonymous and confidential whistleblower platform to cover modern slavery concerns.	<ul style="list-style-type: none"> number of initiatives to increase awareness of whistleblower platform and its availability to report modern slavery concerns number of modern slavery reports received number of modern slavery reports requiring investigations
6	Contract Terms and Conditions	Contracts with modern slavery clauses aligned with ENGIE ANZ expectations.	<ul style="list-style-type: none"> % of key suppliers on standard form contracts (which by default contain modern slavery clauses) % of key suppliers on non-standard form contracts containing modern slavery clauses aligned with ENGIE ANZ expectations
7	Risk Assessments of Supply Spend	Risk assessments on categories of supply and key suppliers	<ul style="list-style-type: none"> determination of key suppliers based on spend determination of categories of supply with high risk indicators
8	Supplier Engagement	Supplier engagement initiatives.	<ul style="list-style-type: none"> number of engagement initiatives with suppliers
9	Supplier Due Diligence and Onboarding Procedures	Supplier due diligence and onboarding procedures to specifically require modern slavery assessment prior to contract award based on risk assessments.	<ul style="list-style-type: none"> % of suppliers successfully onboarded prior to contract award % of suppliers successfully reviewed post contract award progress of any remedy and action plans
10	Self-Assessment Questionnaires (SAQ)	<ul style="list-style-type: none"> self-assessment questionnaires sent to targeted suppliers continual review of SAQ in line with plan for reporting period 	<ul style="list-style-type: none"> self-assessment questionnaires sent to targeted suppliers
11	Third Party Audits	Independent third party social, ethical and sustainability audits of targeted suppliers.	<ul style="list-style-type: none"> continual review of SAQ in line with plan for reporting period
12	Internal Audits	Internal desk top audits of targeted suppliers in line with plan for reporting period.	<ul style="list-style-type: none"> number of audits completed of targeted suppliers progress of any remedy and action plans based on results of audits
13	Site Visits	Site visits of outsourced functions (e.g., call centre operations).	<ul style="list-style-type: none"> number of site visits of outsourced functions
14	Victim Remedies	Supplier remedies for victims.	<ul style="list-style-type: none"> number of victims provided with a remedy from the supplier

Future Actions

Our priority areas to address in forthcoming reporting periods are:

1. further engagement with our key suppliers by developing focussed workshops utilising third party experts to enhance our suppliers' knowledge of risks of modern slavery practices in their own operations and supply chains and ENGIE ANZ's expectations;
2. delving deeper into the supply chain of a key product area utilising third party experts to enhance our own understanding and independent assurance of the results;
3. making our own modern slavery resources available to our suppliers via the development of a dedicated section on the internet; and
4. improving our grievance mechanisms by utilising third party experts.



Appendix A – Controlled Entities

The table below lists the entities controlled by the reporting entities of the IPAH Group (**controlled entities**). The table also highlights the structure of each reporting entity (highlighted rows) within the IPAH Group. In total, the IPAH Group employs approximately 400 people.

IPAH Group

ENTITY	ABN / ACN	LEGAL CLASSIFICATION	EMPLOYEES	CONTROLLED ENTITIES
Canunda Power Holdings Pty Limited	ACN 107 045 518			
Canunda Power Pty Ltd	ABN 31 103 087 341			
GDFSM Finance Pty Limited	ABN 87 169 616 219			
Gregory Solar Farm Holdings Pty Ltd	ABN 26 629 913 873			
Gregory Solar Farm Pty Ltd	ABN 49 621 773 822			
Hills of Gold Wind Farm Holdings Pty Ltd	ABN 18 644 945 380			
Hills of Gold Wind Farm Pty Limited	ABN 28 145 173 324			
International Power (Australia) Holdings 2 Pty Limited (IPAH2)	ACN 105 041 307	Proprietary limited company incorporated in Australia	0	IPAH Group (excluding IPAH)⁹
IPAH Investments Australia Pty Limited	ABN 54 654 150 786			
IPAH Investments Finance Pty Limited	ABN 57 654 151 167			
IPAH Investments Holdings Pty Limited	ABN 25 654 150 160			
International Power (Australia) Holdings Pty Limited (IPAH)	ABN 70 105 041 209	Proprietary limited company incorporated in Australia	0	IPAH Group
International Power (Australia) Pty Ltd	ABN 59 092 560 793			
International Power (Energy) Pty Ltd	ABN 53 062 798 510			
IPAH Client Solutions Australia Pty Ltd	ABN 23 648 461 607		0	-
International Power (Retail) Pty Limited	ABN 18 107 548 854	Proprietary limited company incorporated in Australia	0	<ul style="list-style-type: none"> • IPower Pty Limited • IPower 2 Pty Limited • Simply Energy (a partnership comprising IPower Pty Limited and IPower 2 Pty Limited) • Simply Energy Solutions Pty Ltd • IP (Australia) Energy Ventures Pty Limited
International Power Wind Holdings Pty Limited	ACN 128 574 096			
IP (Australia) Energy Ventures Pty Limited	ABN 76 164 669 505			
IP Wind Power Holdings Pty Limited	ACN 128 576 590			
IP Wind Power Pty Limited	ABN 74 128 577 953			
IPA FIFL Pty Limited	ACN 107 397 544			
IPM (Kwinana) Pty Ltd	ABN 93 067 541 655			
IPM Operation & Maintenance Kwinana Pty Ltd	ABN 95 067 541 664			
Pelican Point Power Limited	ABN 11 086 411 814	Private limited company incorporated in England & Wales	47	None
Perth Power Partnership (a partnership comprising Kwinana Power Partnership and RATCH-Australia Energy (Kwinana) Pte Ltd) ¹⁰	ABN 62 611 338 990			
Silverleaf Solar Farm Holdings Pty Ltd	ACN 629 913 891			
Silverleaf Solar Farm Pty Ltd	ABN 73 630 027 360			
Simply Energy (a partnership comprising IPower Pty Limited and IPower 2 Pty Limited)	ABN 67 269 241 237	Unincorporated partnership	104	None
Simply Energy Solutions Pty Ltd	ABN 86 165 627 396			
Synergen Power Pty Limited	ABN 66 092 560 819			
Warhook Solar Farm Holdings Pty Ltd	ACN 629 913 908			
Warhook Solar Farm Pty Ltd	ACN 630 027 413			

⁹ IPAH2 holds a 99% interest in each of IPAH Investments Australia Pty Limited, IPAH Investments Finance Pty Limited and IPAH Investments Holdings Pty Limited. The other 1% is owned by International Power Ltd Company Number 02366963.

¹⁰ RATCH-Australia Energy (Kwinana) Pte Ltd ARBN 092 883 988, an entity external to the IPAH Group, holds a 30% interest in the Perth Power Partnership.

Appendix B – Non-Controlled Entities

The table below sets out the entities directly owned but not controlled by IPAH2 and indirectly owned by not controlled by IPAH. IPAH2 directly owns 25% of these entities, while IPAH indirectly owns 25% by virtue of its 100% ownership of IPAH2. The remaining 75% interest in these entities is owned by an investment fund under the management of the Infrastructure Capital Group, a specialist, independent infrastructure fund management firm. A controlled entity of IPAH2, International Power (Australia) Pty Ltd, is the asset services manager of the Willogoleche Wind Farm, owned by Willogoleche Power Pty Limited as trustee for the Willogoleche Operating Trust.

ENTITY	ABN / ACN	LEGAL CLASSIFICATION	EMPLOYEES	CONTROLLED ENTITIES
ARET Platform Pty Limited	ABN 29 644 811 763			
Australian Renewables Energy Trust	ABN 13 860 919 939			
Willogoleche Holding Trust	ABN 54 165 306 720			
Willogoleche Operating Trust	ABN 42 876 095 992			
Willogoleche Power Finance Pty Limited	ABN 18 619 933 827			
Willogoleche Power Holdings Pty Limited	ACN 112 307 605			
Willogoleche Power Pty Limited	ABN 22 112 307 589			



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Modern Slavery Statement contact:**

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