



## RES Australia Pty Ltd

# Modern Slavery Act 2018 – Annual statement for the 2024-25 reporting year

This statement is made by RES Australia Pty Ltd (**RES Australia**) and RES Energy Services Pty Ltd (**RES ES**) pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**MSA**), for the reporting year 1 November 2024 to 31 October 2025 (**Reporting Year**). For the purposes of the MSA, RES Australia and RES ES are the reporting entities for this statement.

RES Australia and RES ES are both entities covered by section 6(2) of the MSA and, pursuant to section 6(1) MSA, have volunteered to comply with the requirements of the MSA for the Reporting Year. This MSA a joint modern slavery statement for both reporting entities as per section 14 of the MSA.

## Overview of RES

RES is a global business that develops and manages large scale renewable energy projects and related infrastructure. Headquartered in the United Kingdom, RES is the world's largest independent renewable energy company and has been at the forefront of the renewable energy industry for more than 40 years. Over that period, RES has delivered more than 22 GW of renewable energy projects, and also currently supports a diverse global operational generation portfolio exceeding 12 GW through its construction management, asset management and operations and maintenance services business units. It has strong in-house engineering and technical capability across the technology areas of onshore and offshore wind, solar, storage and electricity transmission / distribution.

In addition to development activities, RES provides construction management, asset management and operations and maintenance (**O&M**) services to our customers. In total, RES employs 4,500 people globally and is active in 23 countries including Australia.

## RES in Australia – RES Australia Pty Ltd and RES Energy Services Pty Ltd

In Australia since 2004, RES Australia is an industry-leading renewable energy developer specialising in wind, solar and battery storage project (**Renewable Energy Projects**) development, and provides construction management and asset management services to Renewable Energy Projects. RES Australia has a strong track record in successfully delivering projects in Australia, with:

- over 1 GW of greenfield renewable energy generation projects developed and sold;
- a growing pipeline of projects in excess of 10 GW, with development sites in each of the mainland States;  
and

- construction and asset management services provided to Renewable Energy Projects in all National Electricity Market (NEM) states and the WEM (WA), managing 22 solar and wind farms (over 2GW in the Reporting Year) across the country (see Fig 1).

RES ES is delivering operations and maintenance services to ~1GW of solar and hybrid Renewable Energy Projects in the National Electricity Market (NEM).



**Fig 1: RES Australia assets under management**

RES Australia employs more than 180 staff, with corporate offices in each of Sydney, Brisbane and Melbourne. The RES ES main office is in North Wollongong.

In the Reporting Period covered by this statement, RES Australia wholly-owned (either directly or indirectly) a number of subsidiaries. These subsidiary entities have been incorporated for the sole purpose of owning the assets for specific Renewable Energy Projects (with the sole exception of subsidiary Blueshore Pty Ltd which provides asset management services to third party-owned Renewable Energy Projects).

The operations and maintenance services business recently acquired from Ingeteam Power Technologies S.A. operates in Australia through RES Energy Services Pty Ltd, which is a related body corporate, but not a subsidiary, of RES Australia Pty Ltd. RES ES employs 25 staff across 8 sites with ~1GW of projects under management. This entity voluntarily registered for the first time under section 6(1) of the MSA, for the Reporting Year.

In order to develop this Modern Slavery Statement the following process has been followed.

- All the RES Australia wholly-owned subsidiaries have been identified (as at the end of the Reporting Year). It has been separately confirmed that RES ES has no subsidiaries.
- All the Directors of these subsidiaries have been consulted and the relevant responsible managers within the RES procurement team have been approached.

- Their feedback has been incorporated into this Modern Slavery Statement.
- RES Australia and RES ES management teams and Directors have been provided with a draft statement for review/comment and sign off of the final statement.

In the Reporting Period, RES Australia's main business activities were:

- Developing Renewable Energy Projects, with a view to selling these projects, usually occurring concurrently with the closing of project finance and just prior to commencement of project construction, and
- Provision of construction management and asset management services to Renewable Energy Projects.

In the Reporting Period, RES ES' main business activities were:

- Provision of operations and maintenance services for solar farms and hybrid solar / storage facilities.

Further detail on each is set out below.

### **Renewable Energy Projects - Development**

In the development phase, RES Australia identifies project sites for Renewable Energy Projects, undertakes initial investigations, secures project approvals, manages the processes to secure connection to the electricity grid, selects contractors and negotiates the suite of project documents required to design, procure, construct and operate Renewable Energy Projects. If applicable, it also negotiates relevant contracts with offtakers for the purchase of electricity from the relevant Renewable Energy Project. This phase usually concludes with the sale of the relevant project to a third party and may include the negotiation and arrangement of project financing.

### **Renewable Energy Projects - Construction and Asset Management**

RES Australia provides services to support the owners of Renewable Energy Projects in Australia to deliver projects through all stages of construction to asset management of the completed, operational asset, and to date has managed the construction of 1.3 GW of Renewable Energy Projects across the NEM. RES Australia has significant experience in construction project management, contractor management, site management, program management, grid engineering and related services, while leveraging the skills and resources from RES' global technical team.

### **Renewable Energy Projects - Operations and Maintenance**

RES ES provides operations and maintenance services to solar and battery Renewable Energy Projects throughout Australia. During the Reporting Period over 2 GW of assets were being supported with these services. The services provided include on the ground maintenance activities, monitoring and operation of renewables facilities to minimise downtime and improve operational efficiency.

### **RES - Supply Chains**

RES Australia's supply chains support the development phase of each renewable project, involving development and commercialisation up to the point at which construction commences and the project is sold.

When providing construction and asset management services to project owners, the level of involvement of RES Australia's supply chains is frequently less significant than in the development phase, with ultimate responsibility for procurement-related decision-making generally resting with the project owners themselves. This is slightly different in the case of O&M services provided by RES ES, where arrangements tend to vary from site to site, between the project owner's supply chain, RES ES's own supply chain, and a mixture of both (depending on the site-specific commercial arrangements).

Separate supply chains support the provision of day-to-day corporate services to the RES Australia business.

The supply chain for Renewable Energy Project Developments across construction and operational phases are the Australian branches of major global businesses that design, procure and supply renewable energy plant and equipment. These major global businesses source plant, equipment and parts from various countries, including:

Australia, Germany, Denmark, Spain, China, Mexico, Saudi Arabia, Thailand, Vietnam, Malaysia, India, Brazil, Italy, Portugal, Spain, South Korea, USA, Morocco and Turkey<sup>1</sup>

## Development Phase Supply Chains

In the development phase, RES Australia is supported by its supply chains in the following areas:

- **Early-stage consultancy services**, including in relation to the identification of sites for Renewable Energy Projects, assessment of environmental planning impacts, cultural heritage and wildlife surveys, project technical and engineering advice, advisory services relating to government, stakeholder, community and First Nations engagement and ongoing relations.
- **Supply, installation and later de-commissioning of monitoring equipment**, such as metrological masts and LiDARs/Sodar devices used in wind farm project resource assessments.
- **Provision of early-stage services and works by major global renewables original equipment manufacturers (OEMs)<sup>2</sup>**, including services relating to the modelling of project grid impacts, selection of subcontractors and suppliers, and design of generation facilities and civil and electrical balance of plant.
- **Engineering and technical advice provided by Australian transmission network service providers**, relating to project grid connection processes.
- **Project procurement**: comprehensive project procurement, under which an OEM or other large international supplier (or suppliers) is identified, selected and then engaged under an engineering, procurement and construction (**EPC**) contract (or similar), often accompanied by a separate Operation and Maintenance (**O&M**) Agreement for the provision of operations and maintenance services after the project is constructed.

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<sup>1</sup> This country list has been compiled from the annual Modern Slavery Statements prepared by RES key suppliers and submitted to the Australian Government.

<sup>2</sup> OEMs generally include wind farm turbine suppliers, grid scale battery suppliers, battery inverter suppliers, solar farm inverter suppliers, tracker suppliers and, in some cases, solar farm module suppliers.

These arrangements are negotiated by RES Australia in the period leading up to project financial close and entered into at financial close which is usually the point in time when RES Australia sells the relevant project to investors. This function has been identified as a key influence point RES has to manage modern slavery risk within the supply chain due to the large influence it has over supplier and technology selection that is then locked in for the project construction and operation.

- **Business and transaction advisory services**, including legal, corporate finance, tax, technical and insurance advisory, associated with the identification of project investors, due diligence, and negotiation and finalisation of project finance and sale documentation, following which ownership of the project will transfer to the new owners, and the development phase ends.

Typically, advisory and early-stage services and transactional services will be provided by local Australian consulting firms and, in some cases, specialist sub-consultants, and by OEMs' Australian-based staff and local subcontractors (e.g. engineering design services provided by local consultancies). In some cases, consulting firms, OEMs and major equipment suppliers will draw upon specialist expertise from overseas offices or overseas-based subcontractors.

Mid and late-stage project development involves technology selection and EPC or similar contracting. OEMs will tender for the opportunity to undertake design, manufacture and supply of much of the plant and equipment required for Renewable Energy Projects, either itself or through subcontractors. A significant portion of this originates from locations overseas, including from the OEMs' own supply chain sources for component parts, consumables and any related services. As noted above, this is a key influence point for RES to mitigate modern slavery risks in its supply chain.

## Construction and Asset Management Supply Chains

RES Australia provides construction management services to Renewable Energy Projects under construction, and asset management services once construction is complete and the relevant Renewable Energy Project is operational.

In the construction management and asset management phases, RES Australia is engaged by the Renewable Energy Project owner to provide services that include managing suppliers and other contractors on the project owner's behalf. RES Australia scope typically covers services to manage the OEM and main contractors on behalf of the project owner during project construction and commissioning, and then to provide long term asset management services. Often this occurs under a long-term construction and asset management agreement.

Supply chains in this phase typically operate as follows:

- RES Australia manages OEMs and other main contractors, that were selected and contracts negotiated during the project's development phase (either by RES Australia itself - if it developed the project, or in other cases by the original project developer);
- RES Australia will also manage the procurement of any suppliers required subsequently by the project owner. These will typically be identified via a tender process or similar, but in some cases, there will be a direct appointment at the request of the project owner.

Where required, as construction and asset manager RES Australia will support engagement of those suppliers on the project owner's behalf, including settling scope and negotiation of contracts (to be executed by the project owner). Typically, there will be a mix of local and international businesses retained, depending on the nature and scope of goods and services sought for the project. International suppliers will be used in cases where specific specialist services or technology is required that is not available locally; and

- In limited cases, RES Australia will engage its own subcontractors to assist it in the provision of construction and asset management services. These are usually smaller service providers based locally.

## **Operations and Management Supply Chains**

RES ES provides operation and maintenance services to operational Renewable Energy Projects throughout Australia. These projects are both RES originated developments and third party developments.

RES ES is engaged by the Renewable Energy Project owner during the operation phase to provide ongoing operations and maintenance services. RES ES' scope of services typically covers the provision of 24-hour secure control room operations, on-site preventative maintenance and on-site reactive maintenance services. This typically occurs under a multi-year O&M service agreement.

Supply chains in this phase typically operate as follows:

- RES ES will manage the procurement of any consumables required for the performance of its services on a particular project. These will typically be identified via a tender process or similar, but in some cases, there will be a direct appointment at the request of the Renewable Energy Project owner; and
- Replacement of CAPEX equipment or provision of spare parts is undertaken on a project-by-project basis depending on the needs of the Renewable Energy Project (so that such activities may be within, partly within or outside of RES ES' scope as O&M service provider). Where the scope of RES ES' services for the relevant project includes procurement, RES ES will generally be procuring from pre-selected suppliers and equipment to match that supplied for the relevant project during the development and construction phase.

In performing operation and maintenance services RES ES will generally have oversight of equipment replacement activities but will usually be restricted in procurement of parts required to the OEMs selected during the development phase. In this regard, RES ES management of modern slavery risk extends to monitoring, and where necessary investigating and reporting to the owner if there is a suspected modern slavery risk associated with any equipment supplied.

## **Corporate Supply Chains**

RES Australia engages local suppliers of goods and services required for the ongoing corporate needs of its business in Australia (including RES ES), including office supplies and consumables, cleaning services, uniforms and corporate apparel, travel and accommodation services, training services, financial advisory, insurance advisory, legal advisory. In addition, some back-office administration and finance management tasks are undertaken for RES Australia by a staffing contractor using personnel based in the Philippines.

Some corporate services are also arranged by RES, to apply to all or some of RES' businesses globally, including RES Australia. This includes the majority of IT services.

## Policies and Governance

The core purpose of the Modern Slavery Act aligns with RES' values and board of directors of both RES Australia and RES ES support the embedding of protections to mitigate the risk of modern slavery practices within its business practices and supply chains. RES in Australia works within a policy framework set at the RES global level, which includes:

- the RES Supply Chain Code of Conduct (**Supply Code of Conduct**), which sets out minimum behavioural standards that RES expects of its partners and suppliers in all countries in which RES operates or procures goods and services, all employees including subcontracted labour, and all suppliers of goods and services. This includes standards in relation to modern slavery, human rights and labour practices. RES' Supply Code of Conduct is being progressively applied to its key global suppliers and other suppliers, either contractually, or as a separate instrument signed by both the RES Chairman and Group CEO, and senior representatives of the supplier;
- RES procurement policies, which take account of the principles behind relevant global initiatives including the UN Global Compact and Ethical Trading Initiative Base Code, and
- RES' Modern Slavery and Human Trafficking Policy, which sets out RES' commitment to do all that is reasonably practicable to support the eradication and prevention of modern slavery and human trafficking. Like the Supply Code of Conduct, this policy applies to RES business activities in all countries in which RES operates or procures goods and services, and all employees including subcontracted labour.

In addition, in Australia, RES has approved its own Modern Slavery Strategy, as required by the RES global policy. This strategy is reviewed and refreshed annually to ensure it remains fit for purpose.

## Risks of modern slavery practices in RES Australia and RES ES's operations and supply chains

During the Reporting Year, neither RES Australia nor RES ES identified any instance of any modern slavery in any of its supply chains. However, RES recognises that there are ongoing risks of modern slavery practices in the operations and supply chains of RES Australia, its subsidiaries and RES ES. Details of risks and actions taken in response are set out below. The RES Australia Modern Slavery governance documentation was reviewed with updated risk assessments being undertaken for the expanded scope of business units and subsidiary entities being covered by this Statement.

### Renewables Energy Projects' CAPEX procurement

Renewable Energy Projects capital expenditure (CAPEX) typically involve extended international supply chains. It is well understood that there are products and minerals required for Renewable Energy Projects, such as the raw

materials required for the manufacture of polysilicon used in solar PV, that are sourced from places such as the outer regions of China, where there are known issues with human rights, labour practices, workplace health and safety and repression of minority ethnic groups. However, it can be very challenging getting clear and complete information about these supply chains and inherent risks, given:

- frequently, there are a many individual links in these supply chains;
- the lack of clear contractual requirements throughout the chain of supply to provide relevant information to enable the buyer to satisfy itself there are no issues in the chain, and risks have been appropriately mitigated; and
- although the Australian subsidiaries of a number of RES Australia’s key global supplier counterparties also report under the Modern Slavery Act, the level of information provided about the overseas supply chain risks of their foreign corporate groups is in some cases quite limited.

During the Reporting Year, RES Australia progressed number of actions in response:

**Enhancing supply chain information:** RES has undertaken the following initiatives in the Reporting Year to gather information, focusing on the activities and supply chain of its key suppliers (OEMs and other major global suppliers with whom RES, including RES Australia, transacts business):

- Actively requested and considered information on Modern Slavery performance when undertaking procurement tenders for Renewable Energy Projects (including balance of plant).
- Undertaking performance reviews and engagement with strategic suppliers for wind farm projects, in relation to supply chain risks including modern slavery.
- Modern Slavery questions included as part of prequalification questions, assessment and selection processes.

RES’ key supplier program continues to build strong relationships with suppliers to assist in understanding the supply chain for our projects. ‘Key suppliers’ are large global wind turbine, PV module and solar inverter companies that RES has prequalified for use on RES Renewable Energy Projects. The majority of the capital expenditure on RES’ Renewable Energy project developments is typically to key suppliers. By working with these suppliers RES is able to build a greater company specific understanding on modern slavery supply chain risk.

In Australia, RES is seeking to improve its understanding of renewable energy and battery storage supply chain issues through its membership of the Clean Energy Council’s Modern Slavery Working Group, which enables collaboration with industry peers, suppliers, and others key players. In addition, RES is a signatory to the Clean Energy Council’s Pledge Against Modern Slavery.

**Improved contractual controls:** RES continues to refine modern slavery obligations in service providers and OEM contracts and term sheets (during tendering activities).

In addition, the RES Supply Code of Conduct includes modern slavery and supply chain traceability obligations. This Code is being progressively applied to key suppliers globally, including those engaged on Australian projects.

**RES Australia procurement process improvements:** In the Reporting Year RES Australia continued to implement core procurement processes, which include a range of pre-qualification checks that extend to compliance matters, ethical procurement and supply chain performance, including modern slavery issues. Changes were made to Solar and BESS procurement processes to include supply chain audits as standard scope items in relevant OEM procurement processes. This will ensure that in addition to procurement stage due diligence checks that on group verification will be undertaken.

Modern slavery questionnaires are now included by RES Australia as part of all major CAPEX tender activities. These seek to test the potential contractors' understanding of their supply chains and risk controls. The responses of the tenderers to the modern slavery questionnaire are a key consideration in selection decisions for preferred contractors and OEMs.

### **Renewables energy projects' OPEX procurement**

In its construction and asset management business (RES Australia) or the operations and maintenance business (RES ES) RES manages or has oversight of ongoing procurement activities to support replacement of defective or end of life parts for Renewable Energy Projects. Typically, the equipment and suppliers to be used have been determined by the project owner during the development of the project. However, RES will generally have responsibility during a project's operating life to raise any modern slavery concerns that it may become aware of to the project owner. In the Reporting Period RES commenced establishment of reporting systems so that all RES employees are able to raise any concerns identified with any procurement contract. RES is also establishing investigation processes to enable any concerns to be acted upon and reported back to the project owners and suppliers where appropriate.

### **RES in Australia corporate supply chains**

In the Reporting Year, corporate (i.e. non-project) procurement was undertaken via local Australian supply chains for office consumables and cleaning services. These engagements were all carried out through Australian law. RES Australia also utilises Philippines-based staff seconded by a third-party service provider to provide back-office support for internal finance functions. In the Reporting Year, RES Australia's People and Culture team has undertaken inquiries with these staff to confirm their working arrangements remain appropriate.

## **Effectiveness**

RES Australia, through an internal working group comprising local procurement and legal employees, has assessed the effectiveness of its response to the highlighted risks during the Reporting Year.

In the Reporting Year, there was considerable effort to monitor the performance of key suppliers, including to test for modern slavery risk in their supply chains. RES Australia currently has several wind, solar and BESS projects in of the course of procurement selection and precontracting. As such, the focus has been in identification of supply chains and assessment of potential project OEM and Contractor Modern Slavery controls and due diligence for these particular projects.

The Construction and Asset Management business and O&M business have not identified any Modern Slavery in any of the projects under management in construction or operation phases of the projects.

## Approval

This statement has been approved by the board of RES Australia Pty Ltd and the board of RES Energy Services Pty Ltd. The content of this statement has also been shared with other relevant internal RES stakeholders for their information, including members of the boards of RES Australia wholly-owned subsidiaries.

Signed by:



**Matt Rebbeck**

CEO, RES Australia on behalf of RES Australia Pty Ltd and RES Energy Services Pty Ltd

April 2026