



Modern Slavery Statement

Financial Year 2021-2022

At Tilt Renewables, we acknowledge our fundamental responsibilities to respect human rights and address modern slavery risks in our supply chain.

We support the Commonwealth Modern Slavery Act 2018 (the Act) and are committed to continually improving the way we identify, address and guard against modern slavery risk.

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1. Introduction

This joint Modern Slavery Statement has been prepared pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**) and is prepared and approved by **PARF Company 2 Pty Ltd** (the **Principle Governing Body** or **Tilt Renewables**). In preparing this statement, Tilt Renewables has consulted with each of its subsidiary companies and the reporting entities in **Table A** below (together with the Principle Governing Body, **Tilt Renewables Reporting Entities**).

The joint statement sets out the actions taken by Tilt Renewables Reporting Entities and their related entities to address the modern slavery risks and efforts taken to maintain responsible and transparent supply chains.

Table A – Tilt Renewables Reporting Entities

Reporting Entity	ACN
PARF Company 1 Pty Ltd	613 789 692
PARF Company 2 Pty Ltd	613 789 772

2. Our Structure and Operations

Our Structure

Tilt Renewables and its wholly owned 36 subsidiary companies (the **Group**) are headquartered and managed in Melbourne, Australia. Except for Tilt Renewables Limited, which is a proprietary company limited by guarantee registered in New Zealand and registered with the Australian Securities and Investments Commission as a foreign entity trading in Australia, all subsidiaries are duly registered Australian privately held companies.

Trust structures have been established within the Group (including special purpose project and holding company trustees) for each of the wind and solar farm assets in operation or under development. (**Figure 1** on the following page identifies the current portfolio of operational, construction and development sites). None of the trust structures within the Group are public trading trusts¹, nor are they public unit trusts². The ultimate beneficiaries of the trusts are limited to the shareholders of Tilt Renewables, and each shareholder is an Australian corporate investee captured by the Modern Slavery Act as reporting entities³ in their own right. Accordingly, the Tilt Renewables Reporting Entities are not required to monitor or report on each of its investees and their operations and supply chains.

Our Operations

Tilt Renewables' business activities include developing, constructing and operating renewable energy generation across Australia (**Figure 1** identifies the current portfolio of operational, construction and development sites).

Tilt Renewables employs 57 employees directly in Australia. Tilt Renewables employees are predominantly office based but provide site support throughout the life cycle of a project during development through construction and into operations.

¹ As defined in Division 6C of Part III of the *Income Tax Assessment Act 1936* (Cth).

² As defined in Section 102P of the *Income Tax Assessment Act 1936* (Cth).

³ Including an investee that is a Commonwealth entity within the meaning of the *Public Governance, Performance and Accountability Act 2013* (Cth).

Figure 1 – Location of operational, construction and development sites



3. Our Supply Chains

Tilt Renewables’ supply chains include:

- asset management services associated with its operational sites;
- construction contractors associated with its construction sites; and
- consultation services associated with its activities across development to operations.

Tilt Renewables’ direct supply chains are Australian based; however, it is recognised that its suppliers also source key parts and labour from a range of countries. Some of the countries⁴ which our suppliers operate in are identified in **Table B**.

Table B – Countries of Origin for Key Parts and Labour

Country of Origin		
Denmark	India	China
United States of America	Vietnam	Malaysia
Germany	Netherlands	

Table C below provides a further description on our key supply chains.

⁴ These countries were determined from the Modern Slavery Statements, supplier-provided checklists and/or other Human Rights statements from our key suppliers.

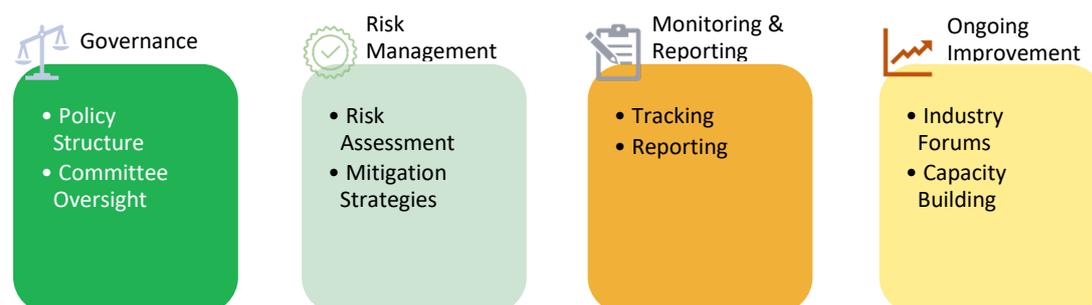
Table C – Description of Key Supply Chains

Supply Chain	Description
Asset Management	Local Australian based engineers and technicians performing on-site maintenance work under a contract with the original equipment manufacturer (OEM). The OEM also uses local subcontractors where required, supplemented with specialist technical expertise from overseas where required. Equipment is sourced from the range of countries listed above.
Construction	Construction projects are supported by contractual agreements for civil/electrical work and the supply/installation of the plant and equipment required for the project. Most of the plant and equipment is manufactured overseas and then shipped to the project in Australia. Throughout the on-site works there is typically a significant number of personnel on-site, including a range of subcontractors. Depending on availability of specialists within Australia, specialists may be sourced from overseas. These technical skills could include (but not limited to) technical engineering and commissioning expertise used for testing and commissioning works. Where workers are not residents of the local area, they are provided accommodation ranging from long term residential rentals properties to overnight accommodation in local hotels.
Development	Local Australian based engineering and environmental planning consultants are engaged directly by Tilt Renewables to perform office based and on-site survey and design work. Where overnight travel is required, they are accommodated in local hotels.
Support Services	Tilt Renewables’ staff conduct a range of office-based corporate functions including health and safety, finance, contract, and project management functions. Tilt Renewables also engages local legal, financial, environmental and engineering consultants to support its activities both at a corporate level and at a project level throughout. The corporate clothing and personal protective equipment provided to our staff is sourced from ethically sustainable suppliers wherever possible.
Ancillary	Tilt Renewables’ supply chains also include services ancillary to its operations, such as the cleaning and security company that services our offices in Melbourne and Sydney.

4. Managing Modern Slavery at Tilt Renewables

Tilt Renewables is committed to the effective management of modern slavery risk within our operations and supply chain. **Figure 2** below identifies the framework which Tilt Renewables use to effectively manage modern slavery risks.

Figure 2: Tilt Renewables’ Modern Slavery Framework



4.1 Governance

Tilt Renewables has a comprehensive framework in place that is designed to incorporate Tilt Renewables' values and commitments. Under its Modern Slavery Policy, all employees, including its directors, agents, contractors and any other parties that represent the business, must adhere to and support Tilt Renewables' commitment to human rights and elimination of modern slavery practices within our supply chain. In addition to its Modern Slavery Policy, Tilt Renewables has implemented the following policies:

- Risk Management Policy
- Health and Safety Policy
- Code of Conduct
- Code of Ethics
- Whistleblower Policy

All the employees of Tilt Renewables are subject to one set of policies, governance frameworks, procedures and other controls that applies to all employee functions delivered across all subsidiaries. It is for this reason that the Principle Governing Body has opted to adopt a joint Modern Slavery Statement. In doing so, the Principle Governing Body has consulted with each Tilt Renewables Reporting Entity in preparing this joint Modern Slavery Statement.

Tilt Renewables' Audit and Risk Committee (ARC) provide oversight of its adherence to the Modern Slavery Policy and the activities associated with this Statement. The Board holds ultimate responsibility for ensuring human rights are preserved and modern slavery practices are eliminated in supply chains.

4.2 Risk Management

Tilt Renewables has a continuous, sustained effort towards its obligations under the Modern Slavery Act and its Modern Slavery Policy. This includes the identification and mitigation of risks associated with the legislation. **Table D** identifies the results of our risk assessment and our mitigation strategies.

Table D – Risk Assessment and Mitigation Strategies

Key Risks and Mitigation Strategies

Sector and Industry Risks – Tilt Renewables operates almost solely in the renewable energy sector and through assessment of its supply chain, has identified the following areas that may pose risks:

- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour)
- Health and safety (for workers that Tilt Renewables do not control or who are otherwise engaged in operations outside of Tilt Renewables' control)

Our Mitigation Strategy – In response to these risks, Tilt Renewables is committed to its Modern Slavery and Health and Safety Policies in identifying and managing any potential risks. These include:

- Clear contractual requirements for suppliers to meet legislative requirements including Australian labour and health and safety practices.
- Increased engagement with suppliers with risks of modern slavery in their supply chains to understand their practices and provide support to address any modern slavery practices if discovered.
- Participation in the Clean Energy Council Modern Slavery Working Group where members are collaborating in effort to identify and address modern slavery in the renewable energy sector.
- Biennial training for staff has increased awareness of potential risks in the industry and provided guidance on how Tilt Renewables will address any issues raised (including support for protected reporting if required).
- Procurement of corporate clothing from ethically sustainable providers wherever possible.

Tilt Renewables continues to work with OEMs and the Clean Energy Council to understand and address any industry risks identified.

Product and Services Risk – As a producer of electricity Tilt Renewables has assessed its exposure to by-product or service risks to be very low. However, Tilt Renewables has looked further into other products and suppliers used, including corporate travel providers who have publicly shared their modern slavery policies and/or statements, showing their shared commitment.

Our Mitigation Strategy – Tilt Renewables has also provided its guidance document to the cleaning and security service provider for its Melbourne office, identifying the risks to modern slavery, highlighting Tilt Renewables' expectations for management and commitment to supporting suppliers in eliminating modern slavery practices in their supply chains.

Geographic Risks – Tilt Renewables' core business of supplying renewable energy products to its customers is coupled with geographic risks. Whilst slavery activity (human trafficking, sexploitation, forced labour and forced marriage) has been identified as occurring in Australia these have been assessed as very low likelihood across the activities and sector of construction and operation that Tilt Renewables operates.

Our Mitigation Strategy – Tilt Renewables works collaboratively with suppliers operating in additional geographies to monitor slavery activity and then mitigation steps when identified.

Other Modern Slavery Risks – Tilt Renewables acknowledges its supply chains are far-reaching. As such, there are a number of areas of its supply chain that Tilt Renewables does not have visibility over, which may involve modern slavery risks. Areas identified by the Walk Free Foundation Global Slavery Index 2018 include:

- Information technology equipment
- Mining of metals that support the equipment supply chains

Our Mitigation Strategy – It is understood that these risks are several layers of supply chain removed from Tilt Renewables' control and that Tilt Renewables has minimal ability to influence practices. However, Tilt Renewables seeks to understand these risks and will continue to work with the Clean Energy Council's Modern Slavery Working Group to engage the relevant government bodies and industry groups to address any issues that might arise.

4.3 Monitoring and Reporting

Tilt Renewables utilise a software solution to enable an integrated approach to Governance, Risk and Compliance. Specifically, the application supports the management of our Modern Slavery compliance requirements and Human Rights obligations through the following:

- Establishing Modern Slavery risk and control owners; and
- Prioritised and scheduled assessments of our Modern Slavery risk and control effectiveness.

In addition to the above, our internal audit function provides independent, objective assurance to Tilt Renewables on the effectiveness of governance, risk management and internal controls.

As identified above, the Tilt Renewables' ARC provides oversight of its adherence to the Modern Slavery Policy. The ARC meets a minimum of four times per year and has a remit to oversee the implementation of policies and procedures related to the identification, assessment, monitoring and management of risk. The ARC assesses and discusses the management of material risks with the Tilt Renewables' Executive.

4.4 Ongoing Improvement

Tilt Renewables staff undergo biennial Modern Slavery Training to increase awareness of potential risks in the industry and provide guidance on how to address any issues raised (including support for protected reporting if required).

Additionally, key staff are members of the Clean Energy Council Modern Slavery Working Group where members collaborate in effort to identify and address modern slavery in the renewable sector.

5. Key Programs and Effectiveness of Actions

Our key activities to address modern slavery include:

- Developed and externally published our commitment to addressing modern slavery through a Modern Slavery Policy.
- Prequalification and screening of suppliers and embedded clauses requiring adherence to Modern Slavery legislation in new contracts.
- Ranked the risk levels of suppliers.
- Conducted a modern slavery assessment of OEMs through consultation with their key Modern Slavery subject matter experts and via a checklist provided to OEMs for their completion.
- Provided a guidance document to smaller suppliers identifying the risks to modern slavery, highlighting Tilt Renewables' expectations for management and commitment to supporting suppliers in eliminating modern slavery practices in their supply chains.
- Provided training to all leadership staff across Tilt Renewables and its subsidiaries, who may be involved in engaging and managing suppliers and customers, including those who visit suppliers manufacturing plants.

In the two years since Tilt Renewables has implemented its Modern Slavery Policy, Tilt Renewables has successfully identified, assessed and addressed its risks to modern slavery throughout its supply chains.

Through providing modern slavery training to its employees responsible for engaging and managing supply chains, these staff are able to monitor, identify and address any ongoing modern slavery practices that may be discovered.

Tilt Renewables will continue to support and actively participate in the Clean Energy Council Modern Slavery Working Group. Tilt Renewables also continues to review the following reports to understand its risks:

- the Annual Trafficking Persons Reports to ascertain the geographical risks in which Tilt Renewables' supply chains operate;
- the US Department of Labour List of Goods Produced by Child or Forced Labour to identify any goods used by Tilt Renewables that may pose a high risk of modern slavery; and
- the Fair Work Ombudsman website to ensure contract arrangements are managed and monitored in accordance with Australian employment law.

Tilt Renewables will also seek to work alongside other relevant non-government organisations to ensure that it remains aware of modern slavery risks in its supply chain, and to avoid inadvertent engagement with modern slavery practices.

6. Endorsement

This statement was approved by the Tilt Renewables Chief Executive Officer and the Board in September 2022 for the year ended 30 June 2022.



Geoff Dutailis

Chief Executive Officer



Cheryl Bart

Chairman



tiltrenewables.com