

Voluntary Modern Slavery Statement 2024

Reporting entity

This is a voluntary Modern Slavery Statement for Zenviron Pty Ltd (ABN 87 612 344 313) for the reporting period 1 July 2023 – 30 June 2024.

Zenviron has prepared this statement in accordance with section 13 and 16 of the Commonwealth Modern Slavery Act 2018.

Business structure operations and supply chains

Structure

Zenviron is an incorporated joint venture between Monadelphous Group Limited (“Monadelphous”) and ZEM Energy Pty Ltd (“ZEM Energy”).

We are a company that specialises in the engineering, procuring and construction of the Balance of Plant aspect of large-scale onshore renewable energy projects. In addition to this we provide consultancy services for renewable energy projects in the feasibility, development and planning approval stages. Zenviron is operated from and headquartered in Newcastle, NSW.

Operations

For the reporting period 2023-2024 our operations consisted of one Battery Energy Storage System construction site in the Latrobe Valley in Victoria and our Head Office operations in Newcastle NSW Australia. All of our staff is directly employed from our parent companies.

Supply Chains

Construction:

For this reporting period the project and construction related supply chains has consisted of high voltage transformers, switch room and high, medium and low voltage electrical cables.

Ancillary:

Our supply chains also include services ancillary to our operations, such as consumables, cleaning, catering and security for our site office.

Modern Slavery Risks

We acknowledge that the risks of modern slavery may be present in our supply chains, relating to vulnerable populations, high-risk supply/services, high-risk geographic regions and high-risk business models. We recognise that we do not always have a complete view of all the areas that we procure from and the associated risks. We also recognise that we do not always have the leverage required to gain this knowledge. This adds risks of modern slavery especially in the subsidiary levels of our supply chain and its suppliers of goods and services.

Actions Taken to Reduce Modern Slavery Risks

We have in this reporting period updated the use of our inherent modern slavery risk identification tool during supplier pre-qualification; refined our company modern slavery procedure to include a risk based decision matrix; and adopted an escalation process in procurement that requires input from highest level of management where Modern Slavery potential high risk is identified.

We continue to engage with and monitor our supply chains through our due diligence processes and work collaboratively with our suppliers where risks are identified.

We continue to maintain a zero tolerance to any form of modern slavery and human trafficking.

We strictly prohibit human trafficking in all our operations and in those of our subcontractors, suppliers and agents in our supply chain.

Our employees are not to be subjected to any form of forced, compulsory, bonded, or indentured labour. All work is voluntary and workers have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice.

The workplace is to be free of any form of harsh or inhumane treatment. This extends to the prohibition of disciplinary procedures that result in wage deductions, reductions in benefits, or compulsory labour.

All workers, irrespective of their nationality or legal status, are treated fairly and equally.

When recruiting and hiring to fill vacant job positions by labour and recruitment agencies, we take all steps necessary to ensure that the labour agencies we engage operate legally, hold the necessary licenses, do not charge recruitment fees to the recruited workers, and do not engage in fraudulent recruitment practices that place workers at risk of human trafficking and exploitation.

We make all our employees aware of their rights and responsibilities at the time of hire, both verbally and in writing in the form of the terms and conditions of their employment contract.

We conduct audits and risk reviews to identify and prohibit from our supply chain suppliers from any nation that is considered a high risk of modern slavery (walkfree.org).

We continue our commitment to ethical business practices along with practical steps to help eradicate modern slavery, including:

- Modern slavery training and education program integrated into our operations, with support from the Supply Chain Sustainability School's tools and resources.
- Review of Modern Slavery risk on a per supplier basis during procurement prior to formal engagement. This is done through the process established in our Modern Slavery Procedure.
- Ongoing review and analysis of operations, supply chain and spend, identifying where exposure to modern slavery may exist.
- Ongoing review and update of Business Management System forms and procedures relating to modern slavery.
- Supporting our customers through their own due diligence reviews in relation to modern slavery risks and acting promptly on any areas of improvement.
- Maintaining a Code of Conduct, which provides our employees with the ability to report instances of actual or suspected unethical or unlawful conduct through our Whistleblower policy. This can be done without fear of recrimination or reprisals, to the extent permitted by the law.
- We are committed to investigate all concerns raised, and to rectifying any wrongdoing which may have occurred to the extent practicable and in accordance with principle of fairness in all investigations.

Assessing the effectiveness of actions

We regularly review our Modern Slavery procedures, which are also routinely scrutinised by our customers and external certification bodies.

We conduct internal audits on our own procurement and supplier registration practices relating to modern slavery assessments, against compliance and to address deficiencies.

Our internal anti-modern slavery policies and procedures are reviewed systematically along with the participation rate of employee training which is reported to senior management.

We continue to evaluate the suitability of our modern slavery program by benchmarking our approach against guidance and information provided by government, our peers and larger corporations in addition to human rights advocacy groups and our customers' requirements.

Consultation

Zenviron does not own or control any reporting entities, nor does it jointly prepare statements under section 14 of the Modern Slavery Act.

This statement constitutes a voluntary modern slavery statement of Zenviron Pty Ltd for the year ended 30 June 2024. This statement has been approved by the Zenviron Board of Directors.



Nicholas Perrott – Director

November 2024