

Energy for a Brighter Future

Modern Slavery
Statement
2025



epic
energy



Acknowledgement

Epic Energy acknowledges the traditional owners and custodians of country throughout Australia and acknowledges their continuing connection to land, waters and community. We pay our respects to the people, the cultures and the elders past, present and emerging.

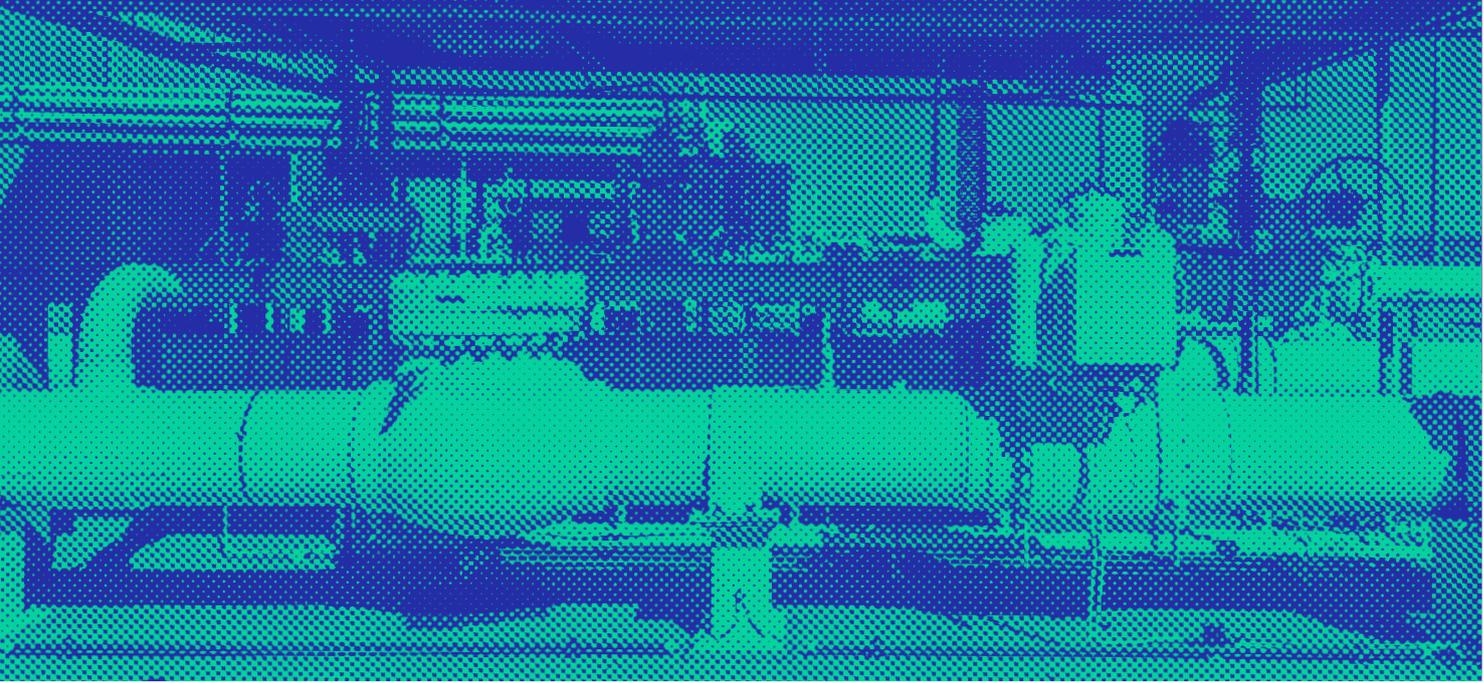




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About this Statement

This Modern Slavery Statement has been prepared by Epic Energy to meet the requirements of the Modern Slavery Act 2018 (Cth) and covers the period 1 July 2024 to 30 June 2025. The terms “the Company”, “Epic” and “Epic Energy” are used in this report to refer to the Epic Group of Companies.

All entities in the Epic Energy group structure, operate under the governance of Epic Energy and share the same management. This statement therefore applies to all reporting entities and their owned and controlled entities.

During the reporting period, Epic’s modern slavery working group consulted and reported to the executive management via the Corporate Governance Committee (CGC). The CGC represents all reporting entities in this statement and their owned or controlled entities. Topics consulted on included actions planned to meet the Act’s requirements and actions undertaken.

This statement has been approved by the Board, as the highest governing body, in December 2025.

Dr Ralph Craven
Chair, Epic Energy Group



About Epic Energy

Epic is a leading energy provider, owning and operating energy infrastructure assets across gas, renewable electricity and storage markets.

We connect retailers, power generators and industry with the vital energy needed to drive communities forward. Our current portfolio consists of a diverse range of assets including the:

- Moomba to Adelaide Pipeline System (MAPS)
- South East Pipeline System (SEPS)
- Timboon and Yawong Wind Farms
- IKEA Solar Array and Battery (IKEA Microgrid)
- Mannum Energy Park
 - Mannum Solar Farm (MSF)
 - Mannum Solar Farm Stage 2 (MSF2)
 - Mannum Battery Energy Storage System (Mannum BESS)

For over 50 years Epic has been supplying South Australian communities and industries with natural gas via our MAPS pipeline.

Our gas business delivers natural gas from production sources to end market users for electricity generation providing the flexibility to support the transition to renewable energy, while continuing to reliably deliver gas for industrial processing, residential cooking and heating.

Our power business provides electricity directly to larger corporate and industrial customers while also supplying retailers to on-sell to customers. Our power assets are connected to the National Electricity Market, while our gas assets supply the South Australian gas market.





About Epic Energy

Epic's Asset Portfolio





About Epic Energy

Our Workforce

As at 30 June 2025 Epic employed 94 workers, all undertaking roles based in South Australia. Roles carried out by Epic employees are varied and range from Maintenance and Engineering roles performed at our assets in rural and remote areas of South Australia and corporate functions based in our head office in Adelaide such as Procurement, Finance, Sustainability and People and Culture.

Epic conducts pre-employment checks for all employees including right to work checks. Epic does not employ people under the age of 18.

Contract type	FY25
Permanent	81
Fixed Term	11
Casual	2
Total	94

Our Supply Chain

In FY25 Epic's approximate supplier spend was \$137 million. 99% of our supplier spend was with Australian based businesses¹ and 18% was with South Australian based businesses. However, we recognise that our suppliers may rely on operations and supply chains from overseas. The international suppliers that we procured from in FY25 were based in Canada, the United States, Germany, New Zealand, and the United Kingdom.

Key Statistics

Total supplier spend	~\$137 million
Suppliers used in the last twelve months	498 suppliers
% of spend with Australian based businesses	99%
% of spend with South Australian based businesses	18%

¹ Supplier location refers to direct supplier's head office location and does not include their supply chain



In FY25 we procured goods and services from a range of supply categories as noted below:

Goods and service procured	% of FY25 spend
Asset-related services including operating and maintenance agreements and the construction of new assets	69%
Professional services including engineering and design services and technical consulting.	10%
Corporate services including insurance, consulting and legal and professional costs	5%
Infrastructure equipment and materials	3%
IT and telecommunications	3%
Freight, travel, and logistics	3%
Safety equipment and workwear	4%
Other	2%

Our main operations and the corresponding supply chains are as follows:

Operations	Key supply chain elements
Infrastructure delivery – capital growth projects such as pipeline connections, renewable and battery storage assets.	<ul style="list-style-type: none"> • Engineering design and technical consultants • Construction contractors • Equipment and materials such as solar panels, battery storage systems, steel pipe • Civil and earthworks
Asset operation and maintenance	<ul style="list-style-type: none"> • Material and equipment such as steel pipe, valves, rotating equipment, and electrical equipment • Maintenance equipment • Operations and maintenance contractors • Engineering design and technical consultants
Corporate services such as: <ul style="list-style-type: none"> • Procurement • Legal • Strategy and Business Development • People & Culture • Risk & compliance • Finance • WHS • Sustainability 	<ul style="list-style-type: none"> • Professional services • Recruitment • Travel and accommodation • ICT equipment and services • Clothing and PPE • Office supplies • Facility management • Fleet management



Identifying Modern Slavery Risks

We continue to assess the risk of modern slavery in our operations and supply chains consistent with the UN Guiding Principles on Business and Human Rights (UNGPs) by assessing the potential for Epic to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

The UNGPs are the recognised global standard for preventing and addressing business-related human rights harm and are recommended as a key source of guidance by the Australian Government.

Cause	Contribute to	Linked to
An entity may cause modern slavery if the operations directly result in modern slavery practices.	An entity may contribute to modern slavery if its operations and/or actions in its supply chains facilitate or incentivise modern slavery.	An entity may be connected to modern slavery through the activities of another entity you have a business relationship with. Your business relationships include all of the entities in your supply chain, including entities you do not have a direct contractual relationship with.

Modern slavery risks within Epic Energy

We assess the risk of modern slavery potentially caused by Epic Energy through our employment practices. In FY25 we considered this risk to be low. This conclusion was based on several factors, including:

- Our workforce is based in Australia, which has a low inherent risk of modern slavery, and primarily employed on a permanent or fixed term basis
- Our recruitment process involves visa and employment checks.
- We place a strong emphasis on the safety of employees, contractors and community along our assets and seek to embed a safety culture. We have an annual wellbeing calendar which includes the promotion of Telus Health webinars which employees can access. These webinars cover a range of topics including psychosocial hazards.

- All employees are remunerated in excess of minimum wage.
- As part of onboarding and induction, all employees must read and understand key policies which outline our expectations around conduct and treatment of others.
- Epic provides a range of additional benefits to employees including salary continuance insurance, health insurance subsidy, paid parental leave, fitness club membership subsidy, flexible work arrangements, and short-term incentive payments for eligible employees.



Modern slavery risks in our supply chain

Epic's greatest exposure to modern slavery risks is via the supply chain for the procurement of goods and services that support our projects and operating business. Under our current controls and practices, we consider the likelihood that we are causing or contributing to modern slavery as defined by the

UNGPs to be low, but we recognise the risk of being linked to modern slavery through the goods and services that we procure.

Products and/or services typically procured by Epic which have recognised modern slavery risks include:

High risk category	Product / Service procured	Known risks
Renewable Energy	Solar PV	Polysilicon, a silica product derived from quartz sand, is a key component in the manufacture of solar panels. Third party reporting has indicated that state sponsored forced labour may be linked to the production of polysilicon in certain regions.
	Batteries	The mining of cobalt, a common component of lithium-ion batteries, has been linked to exploitative practices including child labour in some mining regions. Some batteries are now being manufactured with lower or no cobalt.
	Wind turbines	The mining of minerals used, the use of balsa wood, and the production of metals for wind turbines, have all been linked to exploitative practices when sourced from higher risk countries.
Apparel	PPE	The textiles and garment industry is a well-documented high-risk sector for modern slavery. The production of many raw materials used in textile production such as polyester, cotton, rubber, silk and leather have been linked to forced labour. Exploitative practices at manufacturing facilities has also been extensively reported on.
	Clothing	
Materials	Line pipe	The production and manufacture of material used in the pipeline industry such as steel may have modern slavery risks especially if produced or sourced from higher risk countries.
Information, communications and technology	ICT hardware & services	Electronics and IT companies have modern slavery risks embedded in their supply chains. The mining of key components such as cobalt and mica are associated with modern slavery risks. In some countries there has been reported cases of forced labour in parts of the electronics manufacturing industry which is sometimes reliant on migrant labour.
Short-term recruitment	Construction, Cleaning, Labour hire ,	Suppliers may use temporary, seasonal and contract workers whilst carrying works such as cleaning or the construction of assets. These sectors have been found to sometimes employ a base-skill and migrant workforce who are more vulnerable to exploitative practices. Business models in these sectors also tend to be heavily based on outsourcing, which increases the complexity of operations and supply chains and decreases the visibility of labour risks and impacts.



Assessing and addressing risks

Continuous improvement is a key element of an effective response to modern slavery risks. In FY25 we undertook a range of actions to strengthen our approach to assessing and addressing risks. This section outlines the key actions taken during the reporting year.

Policy & Governance Framework

In FY25 we introduced our Human Rights and Modern Slavery Policy. This policy outlines our commitment to respecting the human rights of all people including those in the communities that we work in, our workforce, and those affected by our activities and business relationships.

This policy outlines our modern slavery working group's responsibility for developing and implementing initiatives to improve our ability to prevent, detect, and respond to modern slavery risks in the goods and services that we procure. In FY25 we broadened the group's membership to bring greater representation from across the business. We strengthened our governance of modern slavery risk management through the development of a working group charter which formally defines the composition, roles and responsibilities within the group and reporting frequency.

The working group reports biannually to the Corporate Governance Committee on matters such as proposed initiatives, the progress of initiatives, and risks or exceptions to policy.

The Epic Energy Board has ultimate responsibility for our approach to, and assessment of modern slavery risks.





Assessing and addressing risks

Risk assessment and due diligence

Our most likely link to modern slavery is via the goods and services we procure and as such our approach to risk management and due diligence is focused on our supply chain.

Current supplier risk management

We continue to assess the risk of modern slavery within our active supplier base by assessing suppliers against the following risk indicators:

Risk indicator	Risk indicator description
Product/industry risk	<p>Modern slavery commonly occurs in industries that supply materials and products and that rely on workers to carry out jobs that are hazardous or low-skilled, often seasonal and low-paying.</p> <p>Industries where labour recruitment is outsourced or which require high quantities of materials, products and parts, often use multi-tiered supply chains. This can contribute to a lack of visibility and control over the recruitment practices of suppliers and subcontractors.</p>
Geographic risk	<p>Countries and regions can become increasingly vulnerable to modern slavery and exploitative practices when there are risk factors present such as governance issues, lack of basic needs, inequality, disenfranchised groups, and conflict.</p>

In FY25 Epic undertook a review of our active supplier base against these indicators to identify suppliers who we might prioritise for further due diligence. Eight active suppliers who were identified as having a medium risk rating and who had not previously been assessed, were prioritised for further due diligence via our self-assessment questionnaire and or via publicly available documents. No high-risk suppliers were identified.

A majority of responding suppliers were determined to have policies and processes in place to manage modern slavery risks. We identified one supplier whose management of modern slavery risks we will seek to better understand.



Appointing new suppliers

In FY25 Epic also developed new procedures to support the identification and assessment of modern slavery risks when selecting new vendors. This procedure applies to the selection of suppliers who support Epic departments with standard, day-to-day operations and activities, encompassing routine tasks and processes necessary for Epic’s business as usual activities, as well as project vendors, who provide services and materials to facilitate delivery of temporary projects being undertaken to create a unique asset, service or result. Projects may include the construction or expansion of an asset. This excludes projects where Epic does not have the ability to choose the project vendors.

This procedure is designed to not only assess our direct suppliers but to also provide visibility of our supplier’s immediate supply chain.

In FY25 Epic undertook a review of its standard contracts and service agreements. As part of this review, anti-slavery clauses were developed and incorporated into new supplier agreements. These clauses detail our expectations and supplier obligations.

Self-assessment questionnaire

Our questionnaire is a key tool in our approach to conducting due diligence of new and existing suppliers. It is designed to:

- Support the identification of modern slavery risks
- Assess supplier maturity
- Foster collaboration
- Improve supply chain transparency
- Identify areas for improvement or further due diligence

It covers a range of topics including:

- Supplier and supply chain information
- Management practices to manage risks
- Training
- Grievance and remediation
- Evaluation of effectiveness

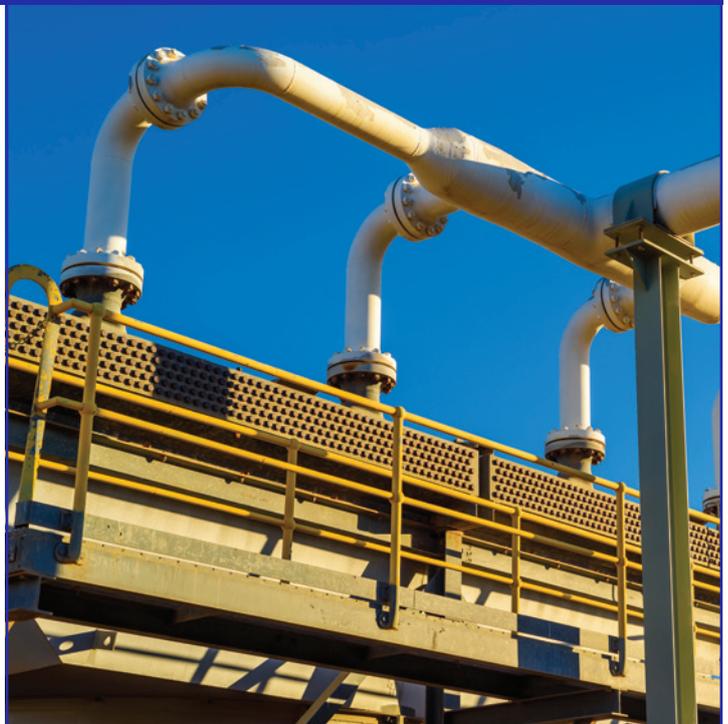
Training and awareness

Modern slavery awareness raising has been included in the inductions of new starters at Epic Energy. New employees are provided with an introduction to what modern slavery is, the requirements of the Modern Slavery Act, supply chain risks and actions being undertaken at Epic.

We have also been providing training for Epic employees as part of the rollout of our new vendor selection procedure. This provides employees with an overview of the new procedure but also an overview of modern slavery risks relevant to Epic Energy.

Grievance Mechanism

While we have undertaken initiatives to assess and mitigate modern slavery risks, we must be prepared to respond to any potential allegation or incidents of modern slavery. In FY25 we updated our Whistleblower Policy to enable Epic Energy Employees and those in our supply chain to report on modern slavery. During the reporting period, no grievances related to modern slavery were received.





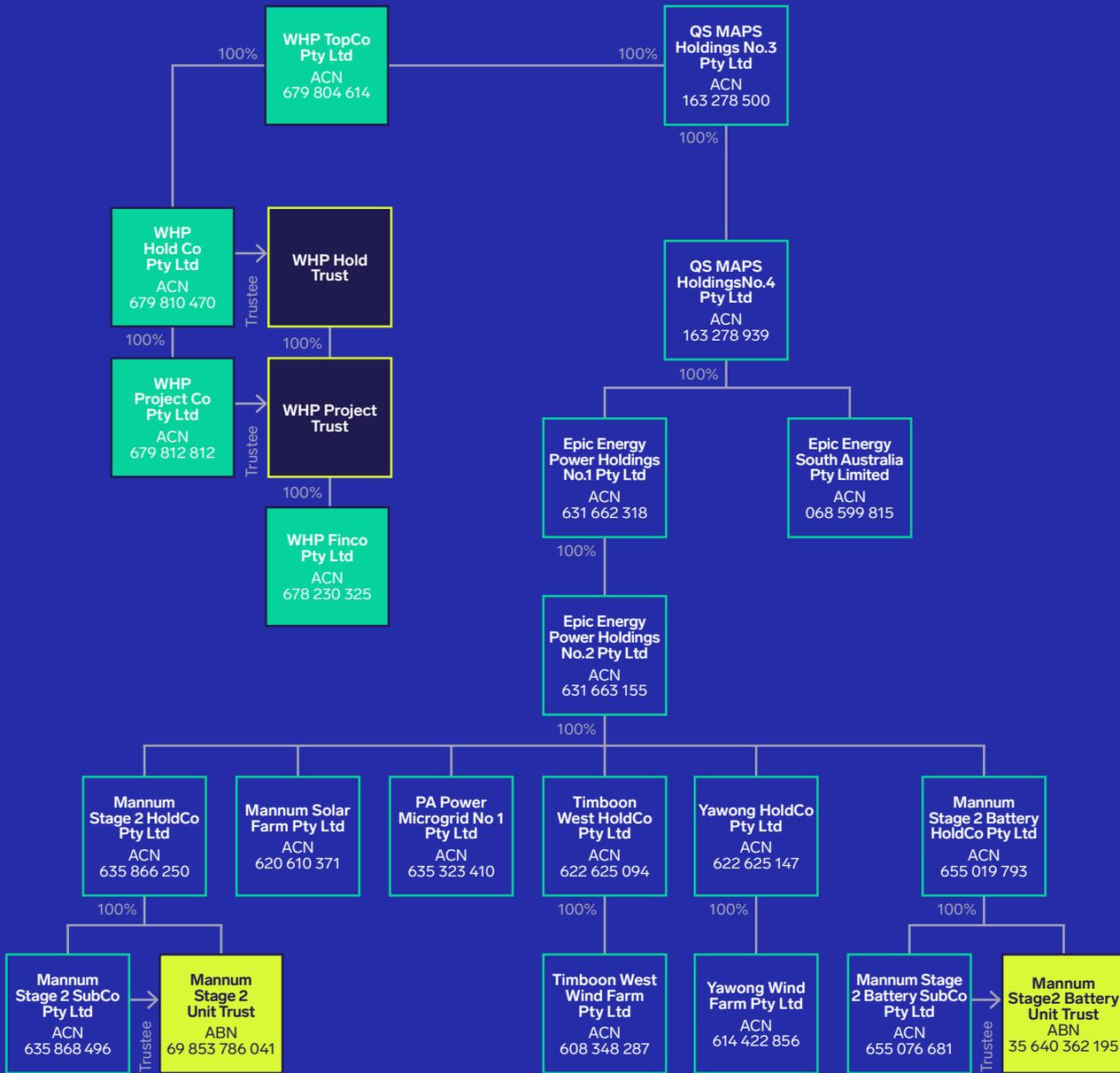
Evaluating Effectiveness

We currently undertake a range of actions to assess the adequacy and effectiveness of the actions we take. These include:

Actions	How we measure effectiveness	Outcomes
Modern slavery action plan		
Modern slavery working group to meet and progress initiatives	The working group monitors and reports to the Corporate Governance Committee on the progress of our annual modern slavery action plan.	<p>The working group met quarterly as per its charter, while sub-groups met regularly where required.</p> <p>Key initiatives from our action plan were progressed in FY25.</p>
Risk management		
Undertake risk assessment of our business-as-usual supplier base	Number of medium and high-risk suppliers identified for further due diligence	<p>8 medium-risk suppliers were identified and underwent further due diligence.</p> <p>We identified one supplier whom we will seek to better understand their management of modern slavery risks.</p>
Benchmarking		
Benchmarking against best practice guidance	Benchmarking of our approach to identifying, managing and reporting on modern slavery risks against Monash University’s disclosure quality reports and the Walk Free Benchmarking Tool.	Findings help us to understand our level of maturity and informs the development of initiatives for our annual modern slavery action plan.



Appendix A – Epic Energy Group Structure (as at 30 June 2025)





Appendix B - Addressing The Mandatory Criteria

Mandatory Criteria	Section	Page Number/s
Identify the reporting identity	About this statement	1
	Appendix A – Epic Energy Group Structure	12
Describe the reporting entity’s structure, operations, and supply chains	About Epic	2-5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	Identifying modern slavery risks	6-7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Assessing and addressing risks	8-10
Describe how the reporting entity assesses the effectiveness of these actions	Evaluating effectiveness	11
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	About this statement	1
Any other information that the reporting entity, or the entity giving the statement, considers relevant	n/a	n/a



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