

NHOA Australia Pty Ltd

Modern Slavery Statement for the year ended 31 December 2022

Reporting entity and reporting period

For the purposes of this Modern Slavery Statement the reporting entity is NHOA Australia Pty Ltd (ACN 651 826 229) ("NHOA Australia"). NHOA Australia has no subsidiaries.

This Statement covers NHOA Australia's reporting period of 1 January 2022 to 31 December 2022.

NHOA Australia is a wholly owned subsidiary of NHOA Energy S.r.l, and forms part of the NHOA group, the ultimate parent company of which is NHOA S.A., a French company listed on Euronext N.V. in 2015. The NHOA group is a global player in the sustainable energy sector developing technologies enabling the global transition towards clean energy and sustainable mobility. It specialises in energy storage solutions, e-mobility and electric vehicles fast-charging infrastructure.

References in this Statement to "NHOA" are references to NHOA S.A., but, where the context permits, the relevant statements apply equally to NHOA Australia Pty Ltd.

Consultation

As NHOA Australia has no subsidiaries, no consultation was required.

Our values and mission

NHOA Australia supports the Universal Declaration of Human Rights and key tenets of the United Nations Guiding Principles on Business and Human Rights. We recognise that companies have a responsibility to respect human rights within their own operations and business relationships and also to take steps to identify and eliminate modern slavery in their business operations and supply chains. NHOA Australia is committed to these objectives and fully supports the *Modern Slavery Act 2018* (Cth).

Our structure, operations and supply chains

NHOA Australia is committed to developing and delivering technologies enabling the global transition towards clean energy and sustainable mobility.

The NHOA group has offices in France, Italy, Spain, Portugal, UK, Germany, the United States of America, Taiwan, Peru, and Australia. It employs over 500 People from 36 nationalities and has filed 130 patents around the world and over 1,200 industrial secrets.

NHOA Australia has 7 employees engaged around Australia, with its head office in Perth and its legal seat in Sydney. For more information about the NHOA Group, please visit us at <https://nhoa.energy/about-us/#our-story>.

NHOA Australia's operations consist of delivering turn key Battery Energy Storage System projects to clients.

It includes the importation of finished goods from manufacturing facilities in Europe and the United States owned and operated by entities within the NHOA Group or third parties products around the world. NHOA Australia does not have local manufacturing activities in Australia.

NHOA Australia uses a third-party logistics supplier to warehouse and ship its products to customers throughout Australia. NHOA subcontract some civil works and “Balance of Plant” activities to local subcontractors. NHOA is always in charge of commissioning the projects and, once projects are commissioned, NHOA is often responsible for the operation and maintenance of the projects for our clients.

When it comes to relationships with supply partners, NHOA Australia has diverse supply chains. Our focus is to continue to evolve our supply chain practices to ensure that they are aligned with our commitment to sustainability and ethical business practices. We seek to establish strong relationships with suppliers who share our values and standards, and work collaboratively with them to reduce our environmental footprint, promote social responsibility, and enhance our overall supply chain performance.

Risks of modern slavery practices in our operations and supply chains

Certain of NHOA Australia’s principal tier 1 suppliers are entities within the NHOA global network. For example, NHOA Energy S.r.l. and NHOA S.A. provide in service staff functions and corporate support on accounting, controlling and treasury activities, including book keeping, payments, financial reports, coordination with local external consultants, relations with local banks. Given these entities are NHOA entities over which we have a high degree of visibility and control, regardless of their locations, we consider the risk of modern slavery within our operations and in these internal supply chains to be low.

In relation to NHOA Australia’s external supply chains, the suppliers that account for NHOA’s largest share of expenditure are involved in the production of batteries, HVAC systems, low and medium voltage equipment, power conversion systems (PCS) and special containers. Most of them (6 out of 10) are situated in Europe, while the remaining 4 are based in Asia. A few of NHOA’s significant suppliers have already been evaluated by Ecovadis (see below under “Due diligence and remediation”), while others have committed to enhancing their ESG profile, despite not being assessed by Ecovadis.

NHOA Australia understands that the energy storage, e-mobility and electric vehicle charging industries generally relies on high-risk industries such as mining and manufacturing that are associated with high-risk geographical locations and that this risk applies to NHOA lower down its global supply chains.

Actions taken to assess and address the risks of modern slavery occurring in our operations and supply chains

NHOA has developed a “Procurement and Management of Suppliers Policy”, which defines procedures and responsibilities for the selection, qualification and evaluation of its suppliers, including material suppliers, service providers such as contractors and sub-contractors, and strategic suppliers. The policy also includes a supplier registry, classifying material suppliers into low, medium- and high-risk suppliers. The selection, qualification and evaluation processes depend on the specific type of supplier and its correlated risk level.

NHOA Australia is otherwise in the process of conducting a review of a large number of policies, including those dealing with anti-bribery & corruption, governance, employment and human rights. It has engaged external lawyers Baker McKenzie to assist with this process and to provide specialist advice across a variety of matters, including advice on how best to identify and eliminate modern slavery practices within its operations and supply chains.

Commitment and policies



NHOA Australia's current [Code of Ethics](#) applies to all NHOA Australia employees and contractors, and expressly states that it respects the spirit and letter of the international conventions and texts it adheres to, in particular the Universal Declaration of Human Rights, the conventions of the International Labour Organization ("ILO"), and the guidelines of the Organisation for Economic Co-operation and Development ("OECD") for multinational enterprises. It further states that the selection criteria for partners, suppliers, service providers and subcontractors of NHOA integrate NHOA's commitments to fighting corruption, respecting human rights and preserving the environment.

In addition, and as part of our commitment to preventing, mitigating and remedying any adverse human rights impacts across our supply chains, we are in the process of updating our policies and procedures to ensure that modern slavery and human trafficking do not enter our product supply chains or any part of our business operations, and have sought third party specialist advice in this respect by engaging external lawyers, Baker McKenzie.

Expectations of suppliers

Our suppliers are integral to the success of our company. While we cannot control all actions of our suppliers, we expect suppliers to treat their employees with dignity and respect and to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees. As part of this, all suppliers are expected to understand and give a written commitment to comply with NHOA Australia's [Code of Ethics](#).

Additionally, in contractual agreements, we require our suppliers to comply with all applicable laws and regulations. In particular, suppliers must assure that it has followed and will continue to follow the applicable national and international laws related to respecting fundamental human rights, including

- not using child labor or any form of forced or compulsory labor;
- preventing discrimination within its company and towards suppliers and subcontractors;
- complying with embargoes and not participating in drugs and weapons trafficking or terrorism;
- ensuring the health and safety of employees and third parties; and
- complying with labor laws and immigration regulations, including prohibiting illegal work.

Our aim is to create a sustainable supply chain that promotes social and environmental responsibility among our partners. We plan to achieve this by forging long-term relationships with our most significant suppliers and implementing policies and programs to improve their performance.

Due diligence and remediation

In 2022, we have launched a supplier engagement plan using the Ecovadis platform, which, through specific metrics, including quantitative ones, evaluates the sustainability profile (Ecovadis rating) considering four parameters: environment, working practices, ethics and sustainable purchasing, each of which is assigned a score. We have already completed an analysis of our main suppliers (the top 10-15 suppliers equivalent to 90% of our purchases). So far, the feedback has largely been positive: only a few suppliers have not qualified or qualified with a very low rating. The next step will be to extend this analysis to all suppliers, rationalizing and reducing the perimeter of our supply chain (which currently consists of 900 suppliers) in order to avoid excessive fragmentation of spending and to introduce the rating within the process of qualification and selection of our top suppliers, attributing

a weight to the Ecovadis rating in the evaluation of the offer, together of course with the usual technical, commercial and quality parameters.

In our own operations, our Human Resources function verifies work eligibility during the hiring process. We also conduct audits to ensure that we are in compliance with minimum wage and age requirements.

Further, our employees and contractors are encouraged to promptly report any known or suspected breach of NHOA Australia's [Code of Ethics](#) or other illegal or unethical behaviour, including human rights violations. This is supported by NHOA Australia's [Whistleblower Policy](#) that provides internal and external channels for reporting illicit or unlawful acts related to the Company, both openly or anonymously, and retaliation against persons who raise concerns or complaints is strictly prohibited. Therefore, if there are any reported instances of modern slavery or other concerns relating to a breach of NHOA Australia's Code of Ethics, these can be raised in confidence and without fear of retaliation. In line with our values, we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains.

NHOA Australia also verifies and ensures all Australian based employees and independent contractors have the right to work in Australia.

NHOA Australia liaises with and obtains guidance from NHOA S.A. and other NHOA Australia affiliates around the world to better understand the progress made and lessons learned from experiences in their jurisdictions with relevant legislation, including with the European Corporate Sustainability Due Diligence Directive.

Accountability

Any employee or contractor discovered to be involved in inappropriate conduct or in violation of our [Code of Ethics](#), our policies, our procedures and/or applicable laws or regulations, is subject to corrective action, up to and including termination of employment or engagement.

The effectiveness of actions being taken to assess and address modern slavery risks

NHOA Australia periodically reviews all its processes, procedures and policies to ensure they remain up to date and to align as closely to best practice as we can reasonably achieve.

Approval

This Modern Slavery Statement is made in accordance with section 13 of the *Modern Slavery Act 2018* (Cth).

This Statement was approved by the Board of Directors of NHOA Australia Pty Ltd on 30 June 30th, 2023.

Signed for and on behalf of NHOA Australia Pty Ltd



Giuseppe Artizzu
Director of NHOA Australia Pty Ltd