

Modern Slavery Statement



→ Modern Slavery Statement FY2025

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01: Message from the CEO and Chair

Across the Solstice Energy Group (“Solstice”), we live out our values of care, community and together in our relationships and interactions with every person connected to our work – whether through our operations, our suppliers or the communities we serve – all deserve to be treated with dignity and respect. Our value of responsibility extends beyond delivering energy safely and reliably; it includes ensuring that our activities do not contribute to modern slavery in any form.

Solstice operates natural gas distribution networks and gas retailing services in Tasmania and Victoria, and retails electricity in Tasmania. Most of our suppliers are based in Australia, with a small number of specialist technical partners located in the EU and the USA. Although the nature of our industry means our exposure to modern slavery risk is low, we approach this issue with care and vigilance.

We use our internal risk management framework and credible external tools and sources to guide our due diligence, supplier engagement and ongoing monitoring. Modern slavery risks are reviewed annually, with findings reported through management to the Solstice Board of Directors to ensure strong governance and accountability.

Over the past year, we have refreshed our risk assessments, deepened our monitoring of potentially at-risk supply chain elements, and confirmed that our grievance processes remain accessible and effective. This Statement has been prepared in close consultation with the entities we own and control, reflecting a shared commitment across the Solstice Group.

We are driven by our customers’ current and future needs, with a clear responsibility to support Australia’s energy transition in a way that aligns with our values. This customer focus underpins how we work with our communities and how we approach ethical and responsible practice across our operations and supply chains.

“Our value of responsibility extends beyond delivering energy safely & reliably”



Phaedra Deckart
CEO Solstice Energy

A handwritten signature in black ink, appearing to read 'Phaedra Deckart'.

Paul Adams
Chairman

A handwritten signature in blue ink, appearing to read 'Paul Adams'.



02: About this statement

Solstice Energy Holdings Pty Ltd (Solstice) (ACN 636 365 805) is an Australian company registered in Tasmania which has ownership and control of several subsidiary entities.

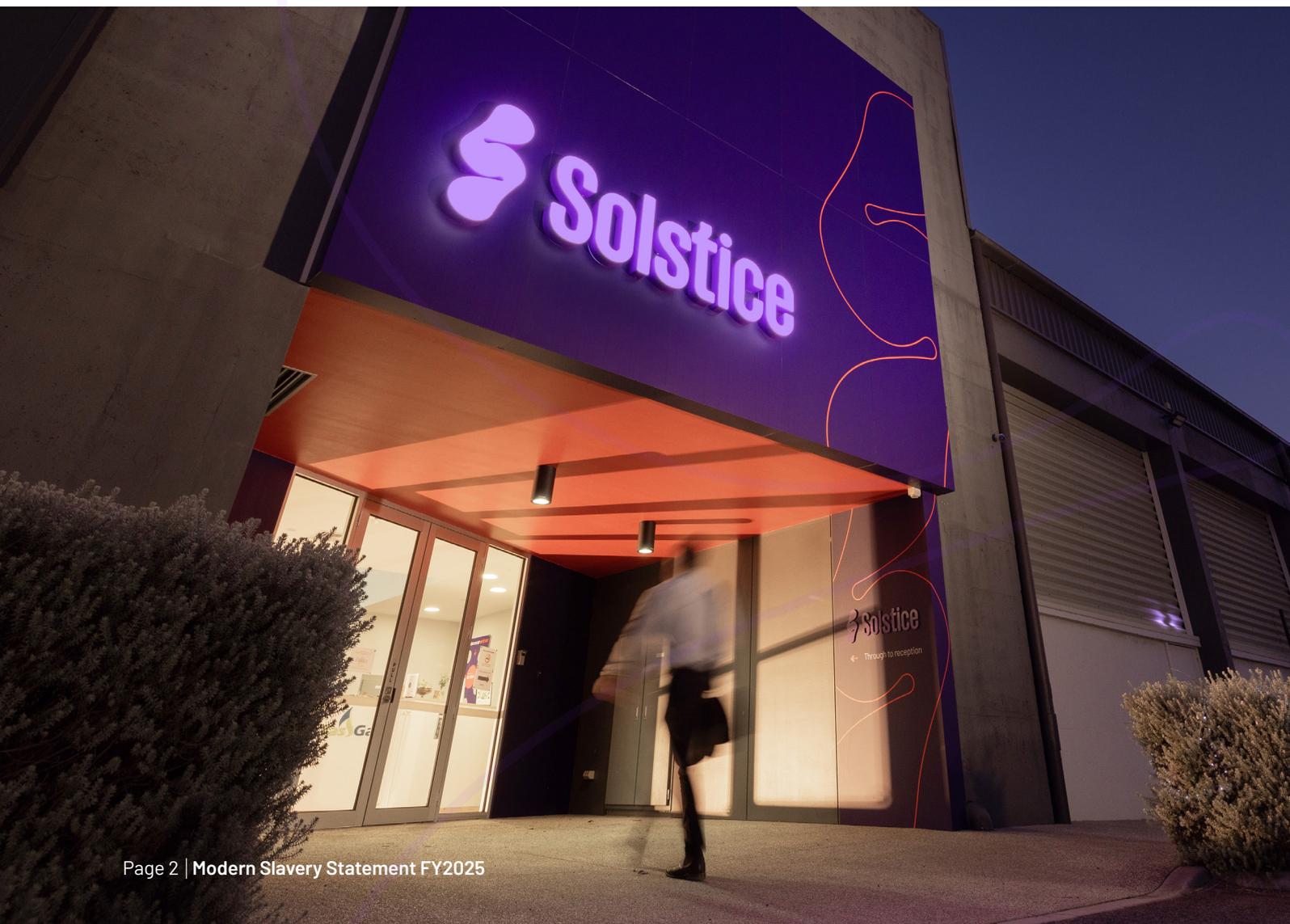
In the 2025 financial year (FY25) Solstice exceeded the consolidated revenue threshold (AUD\$100 million) triggering reporting under the requirements of the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement (Statement) has been prepared to meet these requirements in accordance with the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023). This Statement is prepared on behalf of the Solstice Energy group of companies (Solstice Group) as set out in *Figure 1* and has been approved by the Chief Executive Officer (CEO) and endorsed by the Solstice Board.

Beyond meeting statutory reporting requirements, this Statement reflects Solstice's ongoing commitment to operating responsibly and transparently.

“This Statement reflects Solstice's ongoing commitment to operating responsibly”

Below: Solstice Launceston office



03: About Solstice

Based in Tasmania, Solstice is a diversified energy business offering wholesale energy purchasing and retail electricity and natural gas. As the state’s leading natural gas company, we also have over 20 years’ expertise in natural gas transmission, distribution and transportation in both Tasmania and Victoria.

Our business is founded on care and responsibility to our customers to our people and to the communities in which we work. This sense of accountability extends to ensuring that modern slavery isn’t a part of our operations and supply chains.



04: Our organisational structure

This Statement has been made on behalf of the Solstice Group as set out in Figure 1 and covers all entities within that Group. Each entity within the Solstice Group is covered by the policies, procedures, standards and systems of the Solstice Group.

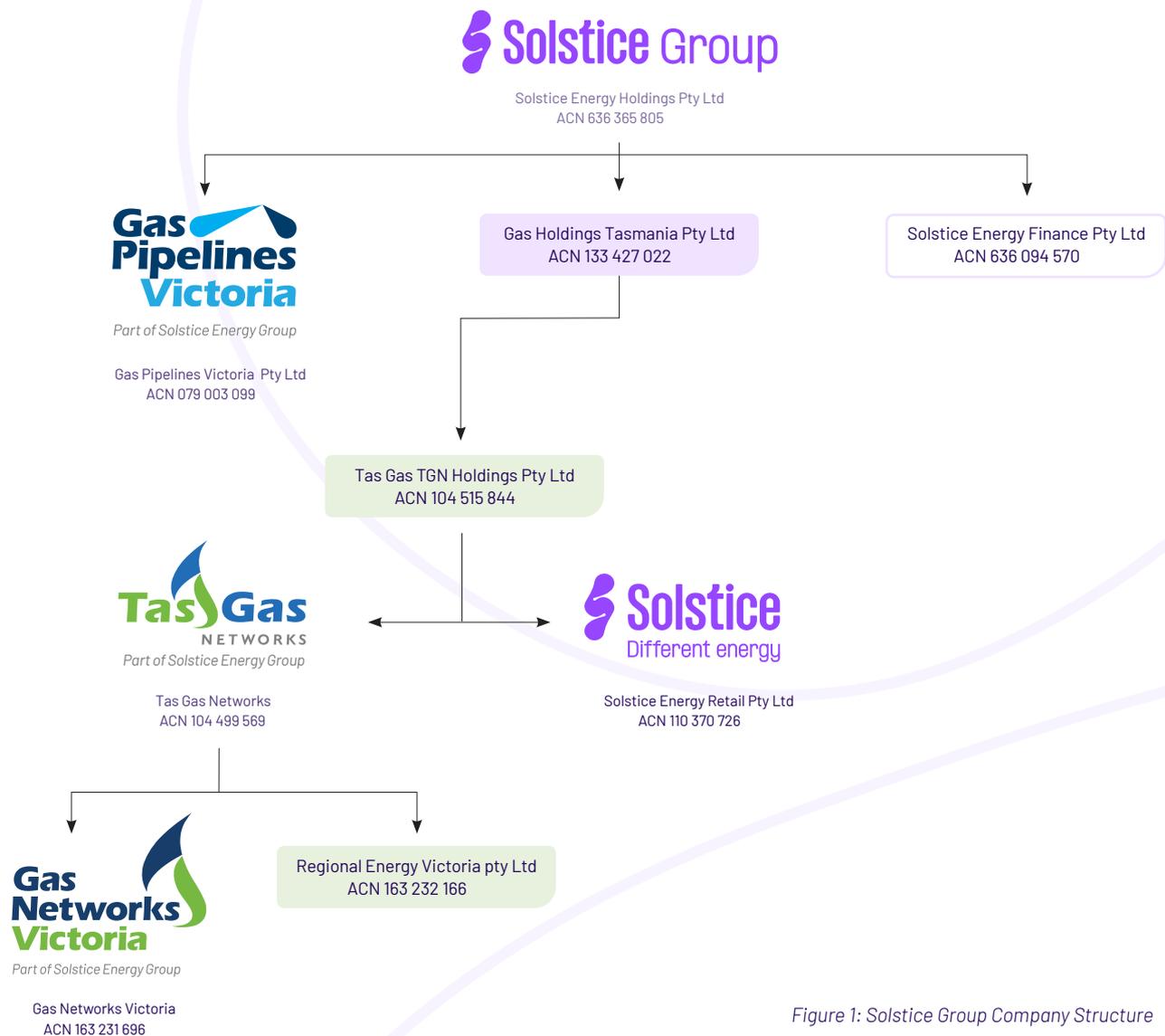


Figure 1: Solstice Group Company Structure

05: Our values

At Solstice, we care and we act.

Solstice is driven by its customers' current and future needs with a clear vision to support Australia's energy transition. We aim to achieve this in a way that is aligned with our values: Community, Curiosity, Care, Together and Responsibility. We want to work together with our communities and make good decisions now to create a better future for everyone.

“We want to work together with our communities”



Below: Solstice Hobart office



06: Our operations

Solstice maintains and operates assets for the supply of natural gas in Tasmania and Victoria. Solstice also maintains a retail capability (Solstice Energy Retail) that retails natural gas in Tasmania and Victoria, and retails electricity in Tasmania.

Tasmania

In Tasmania, assets include networks across 9 towns supplying natural gas to more than 15,000 connected customers.

Victoria

In Victoria, assets include natural gas compression, compressed natural gas (CNG) transportation, trucking, storage and reticulation networks across 10 towns in regional Victoria and the 182km gas transmission pipeline between Carisbrook and Horsham, including the Ararat lateral.

“Solstice is driven by its customers’ current and future needs”

Top left: Solstice office Hobart

Top right: Rural street, Scottsdale

Bottom left: GPV infrastructure in Victoria

Bottom right: GPV employees in Victoria



07: Our supply chains

Solstice takes a risk-based approach to evaluating supply chains, with knowledge of supplier locations to identify and mitigate modern slavery risks.

Both Solstice personnel and contract partners are engaged locally in accordance with Australian employment standards and legislation.

Solstice sources natural gas from the East Coast Gas System, which is transported to Tasmania via the Tasmanian Gas Pipeline (TGP).

Equipment and consumables are primarily sourced from Australian-domiciled and locally based supply partners.

A small number of specialised items for use in the maintenance and operation of the natural gas networks are sourced from technical specialist suppliers located in the European Union (EU) and the United States of America (USA).

“Every product and service Solstice delivers is underpinned by a commitment to customer needs”

08: Our products and services

Every product and service Solstice delivers is underpinned by a commitment to meeting current and future customer needs responsibly.

Solstice is engaged in the:

- * purchase of natural gas and electricity on the wholesale energy market;
- * maintenance and operation of transmission and distribution networks for the transport and supply of natural gas in Tasmania and Victoria;
- * retail of natural gas in Tasmania and Victoria;
- * retail of electricity in Tasmania.



09: Risk Management Framework

The Solstice Risk Management Framework is used to actively identify, assess, manage and mitigate modern slavery risks in its operations and supply chains.

The risk management system has been developed and is managed in accordance with ISO 31000 : 2018 – Risk Management – Guidelines. Enterprise risks are captured and managed within the Solstice Risk and Event Management System.

The scope of this framework includes the operations, supply chains, and products and services of the Solstice Group.

Solstice uses the Risk Management Framework and credible external tools and sources to guide due diligence, supplier engagement and ongoing monitoring.

“Our sense of accountability extends to ensuring that modern slavery isn't a part of our operations”

Below: Solstice Hobart office



10: Assessing and addressing risk

Solstice manages risks using due diligence, governance and training.

The highly technical and specialised nature of the natural gas supply industry and related activities means that modern slavery risks are reduced. There are currently no identified risks that require action to remediate. Solstice continues to monitor areas that may have the potential for greater risk or exposure.

“Solstice continues to monitor areas that may have the potential for greater risk or exposure”

Types of risk

Solstice applies a risk-based approach with due diligence of all suppliers and service providers engaged throughout their production and supply chains. Risks identified and assessed during the assessment process have been summarised below in Figure 4:

OPERATIONAL RISK		
Solstice operations and maintenance:	minimal risk	Solstice personnel are engaged locally in accordance with Australian employment law.
Contract partners:	minimal risk	Contractors are subject to due diligence and ongoing assessment as part of the contract partner engagement process.
SUPPLY CHAIN RISKS		
Solstice sources natural gas from the ECGS:	minimal risk	-
Natural gas is transported to Tasmania via the TGP:	minimal risk	-
Provision of IT and telecommunications equipment:	minimal risk	Subject to ongoing monitoring as a potentially at-risk product.
Provision of uniforms and other clothing:	minimal risk	Subject to ongoing monitoring as a potentially at-risk product.
PRODUCT AND SERVICE RISKS		
Solstice distributes natural gas via established networks in Tasmania and Victoria that it operates and maintains:	minimal risk	-
Solstice is a retailer of natural gas in Tasmania and Victoria:	minimal risk	-
Solstice is a retailer of electricity in Tasmania:	minimal risk	-
Provision of uniforms and other clothing	minimal risk	Subject to ongoing monitoring as a potentially at-risk product.

Figure 4

11: Due diligence

Solstice reviews modern slavery risks annually as part of the HSE Management system and enterprise risk cycle. Controls and mitigating actions are assessed as part of this review cycle. If mitigating actions are deemed ineffective or ill-directed, they are addressed with remedial actions. Solstice expects to continue structured internal audits in FY26.

“We remain dedicated to improving our processes, and fostering responsible practice”

12: Governance

Solstice maintains an operational and organisational structure in which management and the Solstice Board are responsible for the activities of the group and all subsidiaries. The results of risk reviews are reported to management and the Board. Management continually monitor operations, reporting on organisational performance to the Board and its sub-committees on, as a minimum, a quarterly basis.



13: Specific actions undertaken in FY25

Completed the annual review and update of the modern slavery risk assessment for all aspects of its operations, supply chains, product and services.

Completed further assessment of potentially at-risk supply chain elements with ongoing monitoring of existing and/or emerging at-risk components.

Reviewed and assessed existing grievance management processes to ensure that they remain effective for identifying and reporting modern slavery risks. The existing system was confirmed effective.

2025

14: Specific actions planned for FY26

Prepare and submit a Modern Slavery Statement (FY25) for the Solstice Group in accordance with the reporting period under the Modern Slavery Act 2018 (Cth).

Develop and implement a structured consultation and training programme for Solstice personnel to improve awareness of Modern Slavery.

2026



15: Mandatory Reporting Criteria

REPORTING CRITERIA	REFERENCE
Identify the reporting entity	About this statement (Page 2) About Solstice Energy (Page 3)
Describe the reporting entity's structure, operations and supply chains	Our organisational structure (Page 3) Our operations (Page 5) Our supply chains (Page 6) Our products and services (Page 6)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risk Management Framework (Page 7) Assessing and addressing risk (Page 8)
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	Specific actions undertaken in FY25 (Page 10) Specific actions planned for FY26 (Page 10)
Describe how the reporting entity assesses the effectiveness of these actions	Due diligence (Page 9)
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Governance (Page 9)
Provide any other relevant information	N/A

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