



Modern Slavery Statement 2024

+ Acknowledgement of Country

Collgar Wind Farm acknowledges the Traditional Custodians of Country throughout Australia, including Njaki Njaki people upon whose land our wind farm is located and the Whadjuk people upon whose land Collgar's head office is located. We recognise their continuing connections to land, sea, culture and community and pay our respect to Elders past and present.

www.collgar.com.au



About this Report

This Modern Slavery Statement (the **Statement**) is made in accordance with the Australian *Modern Slavery Act 2018* (Cth) (the **Act**). It is a joint statement covering Collgar Wind Farm Pty Ltd and CWF Holdings Pty Ltd (**CWFH**) (collectively, the **Reporting Entities**), and describes activities carried out during the Reporting Period[^] (1 January 2023 to 30 June 2024), to identify and mitigate modern slavery in our operations and supply chains.

References to the **Collgar Group**, **Collgar**, **we**, **us**, **our** and similar expressions refer to CWFH and its subsidiaries, Collgar Wind Farm Pty Ltd, and Collgar Community Fund Pty Ltd, the trustee for the Collgar Community Trust. Each of these entities are Australian proprietary companies registered in Victoria, with principal places of business in Perth, Western Australia. The Collgar Group is wholly owned by the Retail Employees Superannuation Trust (Rest).

CWFH and Collgar Wind Farm Pty Ltd are Reporting Entities for the purposes of the Act. Collgar Community Fund Pty Ltd is not a Reporting Entity, although it was consulted in the preparation of this Statement. Further information on consultation within the Collgar Group is available in the About Us section.

To provide feedback on this Statement, please contact [us](#). Grievance mechanisms are supported through our publicly available [Whistleblower Policy](#).

Reporting Entities

- Collgar Wind Farm Pty Ltd ACN 130 586 088
- CWF Holdings Pty Ltd ACN 142 083 323

[^]Reporting Period

The Act requires modern slavery statements to be prepared for reporting periods reflecting a Reporting Entity's annual accounting period. Following a restructure in 2022, the Collgar Group's annual accounting period changed from calendar year to financial year. To align with this change and avoid gaps across reporting periods, Collgar consulted the Modern Slavery Business and Government Engagement Section of the Attorney-General's Department and have been granted permission to issue this one-off Statement covering the 18-month period from 1 January 2023 to 30 June 2024 (Reporting Period). From FY25 and moving forwards, Collgar's modern slavery statements will cover our new annual accounting period, being 1 July to 30 June.



A Message from our Chair and Chief Executive Officer

As the largest wind farm in WA, Collgar is very proud of its response to important social issues, including operating ethically and responsibly so that we can protect the people, communities, and environment in which we operate.

At Collgar, we take our responsibility to protect the human rights of people and communities in our supply chains seriously. Throughout 2023 and 2024, we continued to take action to address modern slavery risks, as underpinned by our values and strong commitment to upholding human rights.

We know that all businesses have a key role in supporting the eradication of modern slavery, including forced labour, child labour and human trafficking in operations and supply chains.

However, we appreciate that this is not a simple task. We understand that Modern Slavery is a multifaceted and global issue, and that these practices are often concealed several layers down the supply chain where vulnerable people are being exploited through coercion, deception, and threats.

We will continue to evolve our approach for managing this risk and are committed to working with our peers, suppliers and consulting with experts as needed.



Tony Iannello
Chair



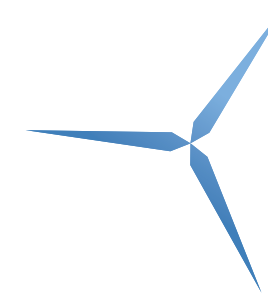
Sam Pearce
Chief Executive Officer

This Statement was approved by the Boards of CWF Holdings Pty Ltd and Collgar Wind Farm Pty Ltd on 23 December 2024.

Tony Iannello, Chair
CWF Holdings Pty Ltd
Collgar Wind Farm Pty Ltd

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About Us

OUR STRUCTURE

In this Statement, descriptions of potential risks associated with procurement of professional service providers in relation to the preparation and audit of the Collgar Group's annual consolidated financial statements are relevant for each of the Collgar Group entities.

See **Table** below for more details.

Collgar Group Entities	Description of Operations & Supply Chain
<p>CWF Holdings Pty Ltd ACN 142 083 323</p>	<p>CWFH is a holding company and its activities are limited to holding the investment and interest in Collgar Wind Farm Pty Ltd on behalf of the ultimate shareholder. CWFH does not have any outward facing operations nor undertake external procurement.</p> <p>All procurement for CWFH is limited to procurement of professional services in relation to the preparation and audit of the Collgar Group annual consolidated financial statements, as required under the Corporations Act 2001 (Cth). The procurement of these professional services is undertaken by the operating entity, Collgar Wind Farm Pty Ltd on behalf of the Collgar Group. For completeness, CWFH has no operations or supply chain of its own.</p>
<p>Collgar Wind Farm Pty Ltd (Collgar Wind Farm, or the Company) ACN 130 586 088</p>	<p>Collgar Wind Farm is a wholly-owned subsidiary of CWFH, and is the operating entity of a wind farm located in Merredin, Western Australia.</p> <p>Except in relation to the shared professional services procured for the preparation and audit of the Collgar Group's annual consolidated financial statements, the entirety of this Statement refers to the operations, supply chains and activities undertaken by Collgar Wind Farm to identify and mitigate the risks of modern slavery.</p>
<p>Collgar Community Fund Pty Ltd (CCF) ACN 155 359 443</p>	<p>CCF is a wholly-owned subsidiary of Collgar Wind Farm, and its sole purpose is to serve as the Trustee of the Collgar Community Trust (CCT or the Trust). CCF's activities are limited to governing the approval of grants to fund local initiatives benefitting Merredin and surrounding communities. Funding for the CCT grants program is provided by Collgar Wind Farm.</p> <p>A high-level modern slavery risk assessment was conducted in relation to CCF's operating activities (i.e., grant giving). The assessment included consideration of the regional location of the grant recipients, the size of grants awarded, and the types of activities the funding supports. The Wheatbelt region of Western Australia has not been identified as a jurisdiction at higher risk for modern slavery. Grants from CCF are limited to \$10,000 and are not available to fund the types of activities which may attract higher exposure to modern slavery risks, like those with complex supply chains such as large scale development projects, or to fund general operational costs or capital works.</p> <p>CCF does not meet the definition of a Reporting Entity under the Act, does not have a supply chain of its own, and has been assessed as having a very low risk of modern slavery practices due to the nature of its activities. As such, the CCF is not treated as a Reporting Entity for the purposes of disclosure under this Statement.</p>

CONSULTATION

Each Collgar Group entity is governed by a Board of Directors with company secretarial support. Given the nature of the Collgar Group's structure, the same individuals serve across each Board and each entity has appointed the same individuals as company secretaries. As such, each entity is aware of the Act's reporting requirements and our plan for addressing these requirements. The Collgar Group entities, including each of the respective boards and senior leadership, have been consulted and provided with relevant materials and updates, and given the opportunity to participate in the process.

Our governance framework of policies and procedures apply across the Collgar Group of entities. Moreover, all procurement decisions are undertaken by Collgar Wind Farm, on behalf of the Collgar Group. This Statement provides a single, consolidated description of our actions to address modern slavery risks.

OUR OPERATIONS

Collgar Wind Farm Pty Ltd is in the business of generating and selling renewable energy via the operation of a wind farm in Merredin, Western Australia. Our primary operating activities include management of the wind farm's operations and maintenance activities, wind energy generation, and energy trading into the wholesale electricity market.

Built over a land envelope of 18,000 hectares (on land leased to the project by Merredin farmers), the wind farm is the largest wind power generator in Western Australia by installed capacity.

The Collgar Group has no direct employees. Collgar Wind Farm outsources its management services to a related body corporate, Collgar Renewables Pty Ltd (**Collgar Renewables**). While Collgar Renewables is not owned or controlled by the Reporting Entities and is not itself a reporting entity under the Act, the officers and directors of the Collgar Group have been appointed from Collgar Renewables.

Collgar Renewables

On 30 September 2022, Collgar Wind Farm entered into a long-term agreement with Collgar Renewables to procure and facilitate the performance of services to enable Collgar Wind Farm to meet the business objectives as set out in its business plan (the **Services Agreement**).

At the same time and after extensive consultation, all Collgar Wind Farm employees were presented with, and accepted, offers of employment from Collgar Renewables on terms and conditions no less favourable than the existing terms with Collgar Wind Farm.

From 1 October 2022, all Collgar Wind Farm employees transferred to Collgar Renewables and Collgar Wind Farm was no longer an employing entity (the **Restructure**).



OUR SUPPLY CHAIN

Service Providers

Most of our supply chain procurement spend goes to key outsourced technical and professional service providers. Services provided by these suppliers include:

- Operation and maintenance of the wind farm
- Management services, as described above and provided by Collgar Renewables
- Operation and maintenance of the South West Interconnected System
- Professional consulting (e.g., legal, technical and financial)

We find value in developing and maintaining long-term, stable relationships with our key service providers. The majority of our key service providers are located in Western Australia or, in some instances, elsewhere within Australia. And although some of our suppliers operate on a global scale, the majority of our interactions are with their local service teams.

The above represents a large proportion of the procurement activity by spend, but we also engage many suppliers who operate as micro-businesses or sole traders, including from rural regions near the wind farm.

Goods

Our supply chain includes the manufacture and transport of equipment, parts and components used in the operation and maintenance of the wind farm, such as gear boxes and specialty electronic hardware.

We also procure smaller value goods, such as personal protective equipment. In this context, our supply chain includes the overseas facilities where these goods are manufactured and the transport and delivery channels to our site.

We also recognise that our supply chain includes the products and services used by our suppliers in the provision of goods and services to us. Using the above example, our supply chain is further extended to include the mining and refining of raw materials used in the provision of electrical componentry to produce the specialty electronic hardware.

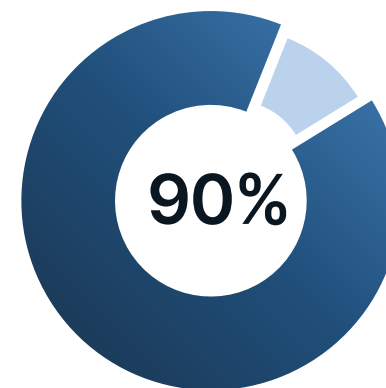
Some of our services are outsourced to key suppliers who provide a permanent workforce solely dedicated to our business. In that context, our supply chain also includes items used by those workers, such as laptops and other personal electronic devices.



Our Operations & Supply Chain

SUPPLY CHAIN

10 suppliers made up 90% of total procurement spend



41.81%

Operations & Maintenance (O&M)

Goods and Service Provider

Technical contractors located in Western Australia, AUS, majority of goods are manufactured in Denmark or sourced from Germany, UK, Spain, Russia, Italy, Turkey, China, India, USA, Argentina, Brazil or Mexico

20.53%

Management Services Provider

Collgar Renewables employees are located in Western Australia, AUS

9.24%

Voltage Regulation Equipment

Goods Provider

Through its Conflict Minerals Report, the supplier has disclosed that materials used in its products may originate in the Democratic Republic of Congo (DRC) or certain countries that share an internationally recognised border with the DRC, including the Republic of the Congo, Angola, Burundi, Central African Republic, Rwanda, Tanzania, Uganda, and Zambia

10.43%

South West Interconnected System (SWIS)

Maintenance Service Provider

Western Australia, AUS

5.96%

4x Professional Services Providers

4 suppliers providing professional services across insurance, lending, legal and audit. Relevantly, 0.60% is attributable to the preparation and audit of the Collgar Group's annual financial statements. These professional advisors are all based in AUS

1.97%

Labour and Specialist Technicians

Service Providers

Speciality equipment maintenance technicians, all based in Western Australia, AUS

TEAM

ZERO

Direct Employees



Long-term Outsourced Service Providers

OPERATIONS



Registered Office
Perth, WA

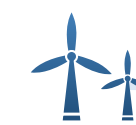


Wind Farm Operations
Merredin, WA

- Renewable energy generator connected to WA's SWIS
- 111 Vestas V90 2.0MW wind turbine generators with a total power production capacity of 222MW
- Generates an average of 670 gigawatt hours (GWh) per year, which is equivalent to the electricity used by more than 136,000 West Australian households¹

CUSTOMER BASE

Collgar Wind Farm supplies renewable energy to the wholesale electricity market as part of an offtake agreement, which is retailed direct to consumers in Western Australia



Collgar Wind Farm



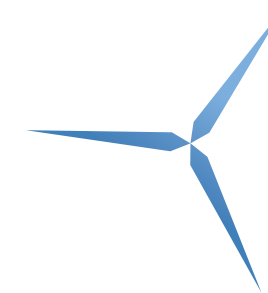
Wholesale Energy Market



Consumers in WA

^{*}The O&M service provider directly employs a team to service the wind farm assets. These employees are located in Western Australia and perform these duties on site in Merredin. Some activities undertaken by the O&M service provider, including in relation to SCADA control, technical and engineering expertise, and product development are monitored and maintained globally in the following regions: Australia, Denmark, and India.

¹Source: Average electricity usage of WA households (13.41kWh/day, using weighted average of average electricity bill by all age groups.) [What is the Average Electricity Bill in Perth WA? - Synergy](#)



Risks of Modern Slavery in our Operations and Supply Chain

We acknowledge the potential that our business may cause, contribute to, or be directly linked to modern slavery practices. To better understand the risk, we begin by identifying areas of our operations and supply chain which may involve one or more of the following risk indicators:

- **Geography** – High-risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the state’s failure to protect human rights.
- **Industry** – Industry sectors may be high risk based on their characteristics, products and processes (e.g., extractives, electronics, and cleaning). Also includes industry sectors with high-risk business models such as those reliant on labour hire and outsourcing.
- **Product** – Products, commodities and raw materials may be high risk based on the way they are produced, including products of agriculture, manufacturing, mining.
- **Services** – Services may be high risk based on how the services are provided (i.e., requires manual labour) or the workforce profile involved in providing the service (e.g., base-skill, vulnerable or migrant labourers)

We have identified the following general types of modern slavery risks that may be present in our operations and supply chains.

Potential that we cause modern slavery practices

- Because we have no direct employees, we rely on the fair and ethical employment practices of our service providers to mitigate the risk of modern slavery practices. Outsourced service providers account for a significant portion of our procurement spend, with 80% of our total spend attributable to 9 out of our top 10 suppliers. Of the 9 suppliers, 5 provide professional advisory services and 4 provide skilled labourers. All 9 suppliers deliver these services using a local (Australian) workforce, reflecting a lower risk of modern slavery practices. However, these characteristics alone do not ensure the risk is eliminated.
- At least one of our outsourced service providers undertakes recruitment activities within and outside Australia. Migrants and temporary visa holders are more vulnerable to deceptive recruitment and debt bondage practices.
- A very small proportion (<0.05%) of our procurement is spent on services such as cleaning and catering. These industries more likely to use foreign workers or temporary or unskilled labour to carry out services that are not immediately visible because the work is undertaken at night or in less accessible locations, which presents a higher risk of worker exploitation.

Potential that we contribute to modern slavery practices

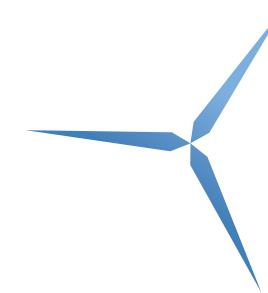
- Our largest procurement spend is for the provision of operations and maintenance services of the wind farm. The same service provider has been engaged since operations commenced in 2012 and the long-standing practice is that maintenance activities are carried out by the service provider’s direct workforce. However, services which fall outside the scope of the agreement can be sub-contracted based on the capacity of the service provider’s workforce, or where specialist skills are required.
- In the process of seeking effective and efficient outcomes for us, our service providers may pursue options that contribute to exploitation of sub-contracted parties, and the degree of separation between us and the sub-contractors may inhibit our ability to identify these behaviours.

Potential that we are directly linked to modern slavery practices

- Goods that we procure for the ongoing repair and maintenance of our wind farm assets have complex supply chains, reaching well beyond the shores of Australia. We lack visibility beyond secondary levels of our supply chain, diminishing confidence in the veracity of our due diligence efforts.
- Many of the goods we procure are manufactured in or use materials sourced from geographically high-risk locations. For example, our largest supplier of goods (9.24% of overall procurement spend) reports the use of “conflict minerals”² in the manufacture of its products, and, through its own supply chain due diligence, has disclosed that some of these conflict minerals may originate in the Democratic Republic of Congo (DRC) or other countries with known prevalence of forced labour, child labour and human rights violations.



²As defined in the US Securities Exchange Act of 1934 as cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives limited to tin, tantalum, tungsten, and gold, and any other mineral or derivative determined to be financing conflict in the DRC or other high risk country.



Taking Action

OPERATIONS: ASSESSING AND ADDRESSING THE RISK

Direct Workforce

During the Reporting Period, we did not directly employ a workforce. However, Collgar Renewables is critical to our ongoing operations, and we consider the health, safety and welfare of its workforce to be paramount to our long-term success. Therefore, we have assessed whether our operations may directly result in modern slavery practices.

- **Geography** – 100% of the workforce is located in Western Australia, which is a low risk location.
- **Industry** – while ours is technically an outsourced business model, this does not present an increased risk to us. Sharing ultimate ownership and having the same Board of Directors and senior management as Collgar Renewables ensures alignment of values and alleviates any potential lack of visibility in the workforce. Under the Services Agreement we also required that Collgar Renewables carryout the services in accordance with our policies and standards, including those in relation to modern slavery risk management.
- **Services** – Collgar Renewables has a low risk workforce profile made up of professionals

Assessment

After considering the characteristics of Collgar Renewables' workforce against the contractual arrangements and degree of visibility and control we have over workplace practices, we have assessed the risk of our operations causing modern slavery practices as low.

SUPPLY CHAIN: ASSESSING AND ADDRESSING THE RISK

Since 2019, we have worked with external modern slavery consultants at SD Strategies to help us understand modern slavery risk factors in our supply chain. Our supply chain risk analysis has become a foundational tool for identifying areas in our supply chain where we may be linked to modern slavery practices.

For the Reporting Period, we identified 151 total direct-spend suppliers, with ~90% of total procurement spend concentrated across 10 suppliers (**Large Suppliers**).

Low Spend Suppliers (the remaining 141 suppliers) represent a higher proportion of suppliers by number, but present a different risk profile than our Large Suppliers. As such, we take a different approach to assessing suppliers identified in these two categories of our supply chain.

Overall, our supply chain analysis suggests that our greatest risk exposure is the procurement of goods rather than services. While we will continue to undertake due diligence activities of our service providers to assure ourselves that hired contractors and labourers are not at-risk of exploitation, our bigger challenge is mitigating the risk that we may be linked to modern slavery practices as a result of the goods we procure.

We are committed to collaborating with our suppliers to increase transparency in our supply chains and working together to take action to identify and implement strategies to mitigate the risk of modern slavery practices.

Large Suppliers

Once identified, Large Suppliers are assessed against the four key modern slavery risk indicators (geography, industry, product and services)³ described on page 10.

Across the four key risk indicators, we identified the following spend categories as potentially high-risk for modern slavery:

- **Construction & Maintenance** is assessed as a high-risk industry sector due to the use of labour hire and sub-contracted workers. In addition, these services are high risk when they require manual labour. Our Large Suppliers also make use of sub-contractors to provide services to us which presents an additional risk due to lack of oversight of sub-contracting arrangements.
 - Vestas – Australian Wind Technology Pty Limited (Vestas), the operations and maintenance service provider of the wind farm, accounts for >41% of spend.
 - We have identified that Vestas' right to sub-contract all or a portion of the services provided under the O&M agreement may present a risk of worker exploitation.

However, we have assessed this risk as low based on contractual mitigations, including that Vestas' right to sub-contract is subject to the terms and performance standards in the agreement, including that works must be performed safely and in compliance with relevant WHS laws.

In addition, the agreement also obligates Vestas to:

- use reasonable endeavours to ensure that all suppliers in its supply chain including all subcontractors do not engage in any activity, practice or conduct that would constitute modern slavery, and
- not use any goods or materials in connection with performing its obligations that it knows or should reasonably suspect have been sourced or made using modern slavery.

- **Plant and Equipment** is assessed as a high-risk due to the geographic locations where raw materials may be sourced and/or manufactured, and the manner in which the goods are transported.
 - Our supply chain analysis shows that we predominantly use Australian suppliers. However, we know that the goods we procure often have complex supply chains where the source of materials and manufacturing can include a number of different countries, which may be higher risk for modern slavery. For example, two of our top suppliers of goods have implemented policies on conflict minerals due to their own supply chain due diligence which suggests their goods may be linked to modern slavery practices.
 - Based on our understanding of the risks associated with the raw materials and manufacturing of some renewable commodities, we have assessed there is a high risk that some of the goods procured to operate and maintain our wind farm may be connected to modern slavery through the activities of other entities deep in our supply chains.



³As supported by international standards and guidelines such as the 2022 Global Slavery Index (GSI), 2022 Global Estimates of Modern Slavery Report and the US Department of Labor's 2022 List of Goods Produced by Child Labor or Forced Labor, and in conjunction with SD Strategies' risk tools developed from 13 global indices.

Labour Hire, Consultants and Professional Advisors

Our operating model makes use of third-party service providers to undertake regular, ongoing, and ad hoc work, both on site and in the Perth office. This type of indirect labour poses a more difficult risk assessment as there is often a lack of transparency into the people providing services.

Aside from Collgar Renewables, we also outsource provision of operations and maintenance, bookkeeping, and IT management services. These outsourced services account for 42.1% of total procurement spend.

With outsourcing arrangements, we have less visibility and control over how workers are engaged to perform these services and there may be a tendency to subcontract or make use of independent contractor models. We also recognise that with the competitive market and tight industry margins, workers in these categories are more exposed to exploitation or unfair working environments.

Our analysis has concluded that the workers are professional in nature (e.g., accounting, ICT experts, engineers) and located in Western Australia, both of which are low risk factors.

Despite these conclusions, we aim to ensure that working arrangements align with our values, and have taken the following actions to address the residual risk:

- Amendments to the terms and conditions in our supplier contracts, including:
 - robust modern slavery clauses, and
 - limitations on the use of subcontractors unless agreed otherwise,
- Due diligence on new vendors (including background checks based on third party risk assessment), and
- All new vendors must indicate whether they have modern slavery policies or processes, which we will use to support and inform our supply chain analysis beyond Large Suppliers.

We also engage professional services firms such as lawyers and accountants. These vendors have been reviewed in line with the key risk indicators and we consider them as low risk for modern slavery practices.

Low Spend Suppliers

A very small proportion of procurement is spent on goods and services from Low Spend Suppliers, however, this group represents over 93% of our supply chain by supplier number (141 out of 151). Instead of assessing each of these suppliers against the key risk indicators, we reverse the process by using the key risk indicators to identify goods and services we know form part of our procurement activities, but which would not fall under Large Suppliers.

For example, cleaning and catering services present a higher risk due to the prevalence of forced labour and debt bondage associated with those industries. However, we address this risk by engaging directly with reputable service providers (i.e., members of the local chamber of commerce, long-standing business operations, etc.), and aim to create long-term, stable relationships and, where possible, understand the workers involved in providing these services to us.

Also included in our Low Spend Suppliers category are micro businesses and sole traders, who are less likely to benefit from steady and predictable revenue. Customer behaviours put this type of supplier at greater risk of worker exploitation. For example, during periods of high demand, employees may be subject to poor working conditions amounting to forced labour, and during slow periods, or if customers fail to pay in reasonable timeframes, employees may have wages deferred or not paid at all.

To address this risk, we engage with our smaller suppliers to gauge their modern slavery awareness and maturity and seek to provide support for implementation of appropriate policies and risk management processes. We also participate in the Payment Times Reporting Scheme, the purpose of which is to help ensure that small businesses receive timely payments for invoices issued to large enterprises, like us. We believe that education and awareness along with prompt payment of supplier invoices may reduce the likelihood of worker exploitation for small businesses.

OTHER ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY IN OUR BUSINESS

Starting from the top, our Board is responsible for setting a culture that ensures we uphold Collgar's core values. The Board's Charter and Collgar's governance framework of policies and procedures articulate our commitment to protecting human rights and set expectations for risk management processes and reporting. During the Reporting Period, our Board emphasised its commitment by approving additional resources to increase capacity and support progress against our action plan.

The following policies, frameworks and action plans enable a consistent approach to responsible and ethical business practices and protecting human rights generally.

- Code of Conduct
- Modern Slavery Policy
- Modern Slavery Action Plan
- Raising Workplace Concerns
- Risk Appetite Statement
- Risk Management Policy and Framework
- Sustainable Procurement Framework (under review)
- Whistleblower Policy
- Work Health and Safety Policy and Management Plan

Appropriate training supports the expectation that employees can identify and assess risks and are equipped to respond appropriately. To bolster the effectiveness of our governance framework, we expect our key service providers to support their workforce's ability to apply these policies by requiring targeted training and educational resources. Where the supplier does not have a program in place, we offer in-depth modern slavery training (developed by SD Strategies) to ensure these capabilities are developed.



ACTIVITIES UNDERTAKEN IN THE REPORTING PERIOD

After the Restructure, our focus for the Reporting Period has been to refresh our Modern Slavery Action Plan and progress these actions to ensure that we continue to take meaningful action and achieve positive change.

The following activities from our refreshed Modern Slavery Action Plan were undertaken during the Reporting Period:

- To prepare for due diligence beyond Large Suppliers, we have incorporated robust modern slavery provisions into our standard terms and conditions, as well as in contract review materials. This ensures all supplier contracts – whether using our template or the supplier’s – contain adequate mechanisms to address modern slavery risks.
- Created an evidence checklist to evaluate supplier compliance with Terms and Conditions modern slavery clauses. This checklist is complemented by supplier-specific KPIs, providing a framework for monitoring and ensuring suppliers meet their contractual obligations.
- In collaboration with SD Strategies, we analysed our supply chain and identified suppliers operating in high-risk areas or procuring high-risk products. We initiated complimentary training on modern slavery for these suppliers to improve their awareness and ability to manage risks effectively.
- Developed a modern slavery information pack tailored for our micro business and sole trader suppliers. This resource is designed to educate smaller businesses about modern slavery risks and provide practical steps for assessing and managing risks in their operations and supply chains.
- Prepared a Board presentation to communicate insights and outcomes since commencement of Australia’s Modern Slavery Act, including an overview of the 2022 statutory review findings, expected future changes, and recommendations for how we can prepare for these changes.
- Developed a statement that outlines our commitment to and ambition for mitigating the risks of modern slavery in our business. The statement, which aligns with legislative requirements and the recommendations of the UN Guiding Principles on Business and Human Rights, is intended for website publication after presentation to and endorsement by the Board.

Produced our inaugural Sustainability Report, which includes an analysis of our efforts to address modern slavery risks. The report will be available on our website this calendar year.

- Integrated modern slavery risk management into company strategic objectives.
- Modern slavery training and awareness for new employees and contractors.



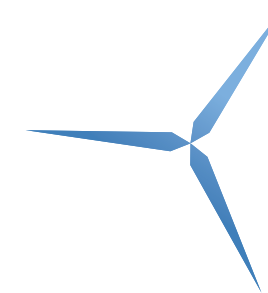
OUR PLANS BEYOND THE REPORTING PERIOD

We recognise that managing modern slavery risks is an ongoing process requiring continuous commitment.

We have identified the following focus areas for FY25:

- Review and update our Sustainable Procurement Framework to ensure it incorporates appropriate modern slavery risk management guidance and practices. This will also include:
 - Providing targeted training to staff on implementing the framework and using associated tools.
 - Embedding the framework into governance processes to ensure its application in relevant circumstances.
- Conduct an in-depth modern slavery risk assessment of our O&M Service Provider, producing a risk-based report and corrective action plan template. This process, supported by SD Strategies, will also involve upskilling Collgar employees to independently conduct similar assessments for other key suppliers in the future.
- Revise our Whistleblower Policy to align with the UN Guiding Principles on Business and Human Rights, ensuring a robust mechanism for reporting, addressing and remediating modern slavery concerns.
- Periodically review and refine our modern slavery action plan and roadmap to drive continuous improvement.
- Continue to review and report on modern slavery risk management initiatives.
- Our Modern Slavery Working Group has planned to roll out refresher training and will conduct a training effectiveness review to identify opportunities for targeted training that offers bespoke insights and ensures learnings can be operationalised.





Effectiveness Review and Continuous Improvement

EFFECTIVENESS REVIEWS

We use effectiveness reviews to understand if and how our action plan supports progress against our commitment to identifying, assessing and addressing the risks of modern slavery in our operations and supply chain. The reviews provide us with the ability to identify gaps in our program, build upon what is working and improve what isn't, and increase overall awareness to achieve better outcomes for those we engage with throughout our supply chain.

We continue to work on developing processes that will support actionable findings as to the effectiveness of our program, including:

Existing Processes

- **Emerging Risks:** our risk framework supports horizon scanning, particularly when new business activities are being explored, to ensure modern slavery risks have been considered in the context of the new activities
- **Supplier Engagement:** we have developed an evidence checklist which corresponds to our updated Terms & Conditions, which will enable us to understand supplier compliance with new clauses and develop supplier KPIs
- **Annual Benchmark Assessment:** enables year-on-year monitoring and progress beyond the action plan and identifies areas for further action
- **Performance Monitoring:** modern slavery training completion rate for key outsourced providers and broader supplier training completion rate
- Tracking and reporting progress against Modern Slavery Action Plan

Processes Under Development

- **Key Outsourced Supplier training:** review modules and assess whether it remains fit for purpose for our business activities
- **Performance Monitoring:** review of broader corporate objectives to ensure they do not promote higher risk behaviours (e.g., lowest cost/rapid delivery demands on suppliers)

Board Review

Our Board reviews and approves our annual modern slavery statement, which provides a focused opportunity to engage with our Board on the effectiveness of our program. This affords the opportunity to explore additional recommendations as part of our ongoing commitment to address these risks.

COLLABORATION

We recognise the need to work with our suppliers to increase collective education and awareness of modern slavery risks to supply chains and procurement practices.

We also recognise that the operating context of our various suppliers will influence their level of maturity and awareness in the modern slavery setting. Some of our suppliers are based overseas and have yet to progress the kind of due diligence required by Australia's *Modern Slavery Act 2018*.

To that end, we take a collaborative approach for engaging with our suppliers and try to support them where they are in their modern slavery maturity journey; our ability to undertake due diligence is only as meaningful as our supplier's ability to understand and respond to our questions. To ensure our suppliers have the tools to assess their own risks, we offer complimentary supplier training and have also developed an info pack with practical guidance on identifying and assessing modern slavery risks in their operations and supply chain.

Through our own capability development journey, we have experienced the overwhelm and uncertainty of where to start and what to expect from supply chain due diligence processes. From this, we have learned that many suppliers have a desire to move the needle on modern slavery practices. We've recognised this shared purpose as an opportunity to engage and share best practices, and where reasonable, we will continue to collaborate in an effort to mitigate the risk of modern slavery throughout our supply chain.

Other Information

Collgar's work in defining and making public commitments to social issues, including our work in developing our Modern Slavery Action Plan, has contributed to Collgar being recognised as Sector Leader in the annual GRESB Infrastructure Asset Assessment.



Let's keep talking



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