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# MODERN SLAVERY STATEMENT

2021

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# INTRODUCTION

This is the second Modern Slavery Statement (“**Statement**”) published by SPIC Pacific Energy Pty Ltd and its controlled entities (“**Pacific Hydro**”) in accordance with the Modern Slavery Act 2018 (Cth).

This Statement covers the calendar year ending 31 December 2021 and applies to the **Pacific Hydro** group of companies. For the purposes of this Statement, Pacific Hydro generally refers to the activities of Pacific Hydro Pty Ltd and its Australian subsidiary companies. The activities of Pacific Hydro Chile SA and its Chilean subsidiary companies (“**PHC**”) are set out in section 12 of the Statement.

We are committed to operating ethically, transparently, responsibly and sustainably. This includes ensuring that our business is conducted with respect for human rights and in compliance with modern slavery laws.

Pacific Hydro has been a signatory to the United Nations Global Compact since 2010. The United Nations Global Compact commits companies to 10 guiding principles on human rights, labour rights, environmental protection and measures to combat corruption. We are an active member of the United Nations Global Compact Modern Slavery Community of Practice and our commitment to operating with respect for human rights is in alignment with the United Nations Guiding Principles on Business and Human Rights.

# ABOUT US

## STATEMENT FROM THE CEO OF PACIFIC HYDRO PTY LTD

Pacific Hydro has a proud 30-year history of building, owning and operating renewable generation assets. For the last decade, our retail arm has also provided affordable clean energy solutions to the Australian public. Our purpose is to “Inspire and Empower a clean energy future” and we strive to do this in a sustainable, and environmentally and socially conscious way.

In June 2021, Pacific Hydro introduced its first Modern Slavery Statement, which outlined the company’s commitment to embark on a journey towards combating modern slavery. I am pleased to introduce Pacific Hydro’s second Modern Slavery Statement, which summarises the company’s actions to date in understanding the risks to our business and supply chains, whilst outlining the areas of focus in the coming years.

As the world moves to a decarbonised future, we see our industry and market continue to grow with new developers, contractors and suppliers. This brings with it a drive to reduce cost, and applies pressure on the supply chain and environment that we work in. Pacific Hydro recognises that modern slavery practices are an increasing risk and maintain a zero tolerance to these practices in our operations. We continue to work together to identify, understand and remedy any risks of modern slavery in our operations and supply chains, as a critical step towards addressing world-wide modern slavery and related practices.

I am proud of the progress we have made to date on this journey, and of our unwavering commitment to further understand and improve our supply chains and our impacts.

**Domenic Capomolla**  
Pacific Hydro CEO



## WHO WE ARE

Founded in Australia in 1992, Pacific Hydro operates a high quality, diversified portfolio of wind, solar and hydro renewable assets with an installed capacity of 665 MW.

We have a development pipeline of substantial projects in Australia, across Queensland, South Australia, New South Wales and Victoria totaling over 1.2GW of potential capacity and energy storage solutions. We have also been operating in Chile since 2002, with hydro and wind power assets and a part-owned, non-managed joint venture. Our energy retail arm, Tango Energy Pty Ltd (“**Tango Energy**”) was launched in 2012 to meet Australian demand for low cost, simple energy plans with a clean conscience. Tango Energy has over 150,000 customers, and its continued growth is pivotal in supporting Pacific Hydro to deliver a clean energy future. With headquarters in Melbourne and a customer service team based in Geelong, Tango Energy’s growth has also created new jobs for Victorians.

Pacific Hydro has never sold any of the assets it has built in Australia. We are committed to Australia’s

long-term, clean energy transition. Pacific Hydro was acquired by the State Power Investment Corporation (“**SPIC**”) through its subsidiary, State Power Investment Overseas of China (“**SPIC Overseas**”) in January 2016. SPIC is one of the five major power generation groups in China and the largest solar power generation business enterprise in the world. SPIC ranked 293 among the Fortune Global 500 in 2021, with its businesses covering 46 countries and regions, including wind power, hydro power, thermal power, hydrogen energy, energy storage, integrate smart energy and green energy-powered transportation. By the end of 2021, SPIC’s overseas installed power generation capacity totalled 6.8GW, with a clean energy ratio of 73.6%.

Pacific Hydro’s operating assets in Australia currently avoid over 1.6 million tonnes of greenhouse gas pollution every year.

Pacific Hydro has built a strong reputation for engaging with the communities within which it operates and has a track record of collaborating with local communities to deliver meaningful, lasting and sustainable benefits.

# REPORTING ENTITIES

## THE REPORTING ENTITIES FOR THIS STATEMENT INCLUDE:

- SPIC Pacific Energy Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria;
- SPIC Pacific Hydro Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria;
- Pacific Hydro Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria;
- Pacific Hydro International Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria;
- Pacific Hydro Australia Holdings Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria;
- Energy Pacific (Vic) Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria;
- Pacific Hydro Retail Holdings Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria; and
- Tango Energy Pty Ltd, a proprietary limited company incorporated in Australia with its registered office in Melbourne, Victoria.

A list of all controlled companies of SPIC Pacific Energy Pty Ltd is set out in Appendix A of this Statement.

# OUR CULTURE AND VALUES

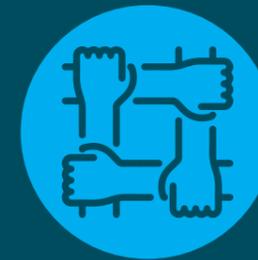
## PURPOSE

Inspire and Empower a clean energy future

## MISSION

Leave the world a better place

## VALUES



We are Better Together



We Care



We are Customer Focused



We Take Action

# OUR OPERATING STRUCTURE

Pacific Hydro consists of a group of unlisted companies operating across both Australia and Chile. Our Australian operations, employing 192 staff, are headquartered in Melbourne. Our Chilean operations employ 113 staff headquartered in Santiago.

Pacific Hydro staff are predominantly based in our Australian and Chilean city-based offices, with some on-site staff providing support during the development, construction and operational phases of our renewable energy projects.

Pacific Hydro's Australian Executive Team is comprised of ten experienced senior executives, including one shareholder's representative.

Whilst not listed, the Board of Pacific Hydro Pty Ltd operates in accordance with the Australian Stock Exchange Corporate Governance Council's "Corporate Governance Principles and Recommendations" (ASX Standards) as the benchmark for standards of good governance practice.

# OUR OPERATIONS AND SUPPLY CHAINS

Pacific Hydro's operations span the spectrum of energy generation and retail, and our supply chains include over 2000 suppliers who provide a range of goods and services from many countries.

BUSINESS AREA	OPERATIONS	SUPPLY CHAINS
<b>GENERATION AND WHOLESALE</b>	<ul style="list-style-type: none"> <li>Development, construction and operation of renewable energy assets across Australia and Chile including solar, wind, hydro, pumped hydro, battery energy storage and hydrogen power.</li> <li>In-house development and planning applications for energy projects, supported by specialist consultants.</li> <li>Delivery and management of renewable energy asset construction, via EPC and unbundled arrangements.</li> <li>In-house engineering and project management, including renewable energy and grid connection engineering and site management.</li> <li>Asset management of renewable generation infrastructure.</li> <li>Wholesale energy trading, hedging and dispatch.</li> </ul>	<ul style="list-style-type: none"> <li>Operations and maintenance services for wind, solar and hydro assets.</li> <li>Consultancy services for development, delivery and operational activities, such as locally based engineering and environmental planning consultants.</li> <li>Parts and equipment for renewable energy assets and components.</li> <li>Parts and equipment for delivery and operational activities.</li> <li>Construction projects under tender conditions including all necessary civil and electrical work on site, with the contractor responsible for supply and installation of plant and equipment.</li> <li>Plant and equipment that are manufactured overseas then shipped to the project.</li> <li>Labour for site works, typically sourced from local communities or other areas as needed.</li> </ul>
<b>RETAIL (TANGO ENERGY)</b>	<ul style="list-style-type: none"> <li>Energy and gas retailing to consumer and large business customers in Australia.</li> <li>Inbound and outbound customer solutions and call centre operations.</li> <li>Energy marketing and sales.</li> <li>Product development and pricing.</li> <li>Business and IT systems.</li> <li>Credit management.</li> <li>Service delivery and billing.</li> </ul>	<ul style="list-style-type: none"> <li>Consultancy services for retail, IT and operational activities.</li> <li>Parts and equipment for retail and operational activities.</li> <li>IT equipment and infrastructure.</li> <li>Third-party sales channel partners, including mass market lead generation partners, mass-market full-service partners and multi-site brokers.</li> <li>Third party sales channel staff are located both onshore and offshore in countries such as Philippines, India, and the Fiji Islands.</li> <li>Office supplies and branding/merchandising.</li> </ul>
<b>CORPORATE, SUPPORT AND GOVERNANCE</b>	<ul style="list-style-type: none"> <li>Corporate, advisory and governance functions that support the relevant business units, ranging from:</li> <li>People and safety, including human resources and HSE,</li> <li>Strategy and commercial,</li> <li>Finance and accounting,</li> <li>Information technology and systems,</li> <li>Legal, risk and compliance, and</li> <li>Project management functions.</li> </ul>	<ul style="list-style-type: none"> <li>Office supplies, services and equipment for Pacific Hydro offices and premises.</li> <li>Electronic goods and supplies for IT equipment and infrastructure.</li> <li>Local and international legal, financial, risk and business consultants.</li> <li>Clothing, workwear and PPE.</li> <li>Merchandising items.</li> </ul>

# OPERATIONAL AND SUPPLY CHAIN RISKS

## IDENTIFYING RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

In 2021, we further analysed our operations and supply chains to identify modern slavery related risks and updated our risk register of the key risk areas identified.

The potential modern slavery risk 'hot spots' in our operations and supply chains are listed below.

These risk areas will continue to be our focus for on-going engagement with suppliers and monitoring of their supply chains.

### KEY OPERATIONS RISK AREAS

RISK AREA	RISK
OFFSHORE LABOUR	Use of offshore labour via third party sales channel partners operating in countries including India, Philippines and the Fiji Islands, who provide call centre and back office personnel for Tango Energy operations. Given the high-risk geographies, this was flagged as a high-risk area of our operations.

### KEY SUPPLY CHAIN RISKS

RISK AREA	RISK
SOURCING OF RENEWABLE ENERGY PARTS AND COMPONENTS	Procurement of renewable energy technology in generation and wholesale, as well as rooftop solar installation, due to lack of supply chain visibility beyond the contractor level and higher risks present throughout the supply chain, ranging from sourcing raw materials, to the manufacture of turbine parts or solar panels.
SOURCING OF CLOTHING, WORKWEAR, PPE AND OTHER SAFETY EQUIPMENT	Procurement of clothing, workwear, PPE or other safety equipment in the supply chains of Pacific Hydro's generation and project delivery business, due to the higher risks present throughout the supply chain, ranging from sourcing raw materials such as cotton, to labour rights issues and complex supply chains.
SOURCING OF ELECTRONIC GOODS AND OFFICE SUPPLIES	Procurement of IT equipment and office supplies in the supply chains of Pacific Hydro offices, due to the lack of supply chain visibility and risks present within the supply chains of products such as electronic goods and sourcing of raw materials, which are typically sourced from higher risk geographical areas.

## Ongoing risk assessment and actions

In 2021, we undertook further assessment of our current supplier base and conducted a risk mapping exercise of critical suppliers against the high-risk supply categories.

Assessments were made based on responses to Pacific Hydro's detailed questionnaire that sought to review suppliers' modern slavery risk level and capacity to eliminate any such risk in their supply chains.

The questionnaire comprised of questions requesting information regarding the suppliers' procurement policies, procedures and practices, and asked for the disclosure of any known or suspected modern slavery concerns in their businesses.

In 2021, we conducted assessments for a further 35 suppliers, and followed up on residual actions for suppliers assessed in 2020.

A total of 80 suppliers have been assessed since the commencement of the modern slavery risk assessment programme. It is estimated that a total of 15 suppliers will require to be monitored and assessed periodically based on the nature of their industry and risk profile.

Pacific Hydro's on-going periodical monitoring include due diligence activities in high-risk areas, covering determination of country of origin of supplies and services, manufacturing locations and source of labour for equipment and componentry that go into items procured by Pacific Hydro for its newbuild and existing assets.

Suppliers reported for breach in other jurisdictions (e.g. USA and Europe), have been approached for clarification and demonstration with evidence of their supply chains being free of modern slavery for supplies made for Pacific Hydro. Please see sections 8 and 9 for details of actions undertaken including reference case studies.

Pacific Hydro has also taken a proactive approach to creating awareness amongst its lower risk suppliers who are currently not engaged by Pacific Hydro in the relevant risk areas, but who may benefit from better knowledge of modern slavery issues. Training material has been developed and provided to suppliers in this lower risk category for their understanding and building of awareness. A total of 18 suppliers have benefitted from customised Pacific Hydro training on modern slavery.

# GOVERNANCE AND POLICY FRAMEWORK

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**Pacific Hydro's Modern Slavery Policy sets out the framework for its approach to modern slavery and includes the following objectives:**

- To identify modern slavery risks in Pacific Hydro's operations and supply chain;
- To identify actions to assess, address and prevent those risks, including due diligence and remediation processes; and
- To provide training or other anti-slavery resources to employees.

Pacific Hydro's Modern Slavery Incident Management Procedure sets out the procedural response to a suspected modern slavery incident.

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**In addition to the above, the following policies and procedures support Pacific Hydro's approach to modern slavery:**

- Pacific Hydro Code of Conduct;
- Pacific Hydro's Values and Behaviours;
- Pacific Hydro's Procurement Policy and Procedures;
- Whistleblower Policy;
- Enterprise Wide Risk Management Framework; and
- Health, Safety and Environment Policy.

In 2021, Pacific Hydro established a governance process which includes the creation of a cross-functional Modern Slavery Working Group made up of staff from across the legal, risk and procurement functions of Pacific Hydro's Australian companies and Tango Energy.

The Working Group has been operational since June 2021 and is currently chaired by Pacific Hydro Pty Ltd's General Counsel and General Manager of Legal, Risk and Compliance. The working group is responsible for planning, co-ordinating and implementing Pacific Hydro's Modern Slavery response, as well as investigating modern slavery risks.

Quarterly updates are provided to the Board of Pacific Hydro Pty Ltd, which provides oversight in relation to the group's modern slavery requirements and the activities set out in this Modern Slavery Statement.

# ADDRESSING MODERN SLAVERY RISKS

Pacific Hydro recognises that it is a shared responsibility – among principals, contractors and suppliers – to raise awareness of modern slavery risks and prevent human rights abuses occurring by on-going engagement of suppliers and monitoring of risk areas, risk assessment and mitigation.

With that in mind, during this reporting period Pacific Hydro undertook a number of activities to progress work previously carried out in 2020, specifically in the areas of risk assessment and enhancing readiness of our staff and supplier base to tackle modern slavery.

Suppliers who did not demonstrate significant engagement with the potential modern slavery issues and who lacked robust policies to underpin their management of this risk were followed up with an action plan commensurate to their gap level.

## PACIFIC HYDRO'S 2021 MODERN SLAVERY ACTION PLAN INCLUDED THE FOLLOWING KEY ACTIVITIES:

- A Modern Slavery risk assessment exercise was undertaken for a second group of 35 suppliers in September 2021, in addition to first group of 40 suppliers that was carried out in 2020. Subsequently, Pacific Hydro's modern slavery Risk Register was updated. We updated our Modern Slavery Incident Investigation Procedure to include provisions within our Whistleblower Policy for incident reporting, empowering our staff to take action if they suspect any instances of modern slavery and require management to immediately respond to modern slavery notifications in a transparent and thorough manner.
- We improved our education, awareness and accountability framework among staff and suppliers. We rolled out compulsory modern slavery training across our internal training platform, which was completed by permanent and part-time employees. Since its roll out in 2021, Modern Slavery Training is carried out annually as a mandatory requirement for all staff at the beginning of each year and at the time of new staff joining the company as part of their onboarding induction training.
- We customised training material for Pacific Hydro Directors and completed the first roll out of Directors' training in Q3-2021.
- We customised training material for external parties, which was provided to a selective group of suppliers for awareness and to improve their knowledge on modern slavery issues.
- Whilst our risk assessment and subsequent follow up actions with suppliers indicate that it will be prudent for some suppliers to be monitored with periodical assessments carried out (due to the nature and risk profile of their supply industry), Pacific Hydro is generally pleased with the level of engagement and co-operation that has been forthcoming from those suppliers.
- The majority of our suppliers are actively engaging with the Modern Slavery Act and the majority of suppliers had either established their own modern slavery policies or were in the process of doing so. Suppliers have submitted their latest documents including published Modern Slavery Statements (where applicable).
- We incorporated model clauses into our template contracts and major supply agreements, requiring counterparties to comply with modern slavery laws and implement processes and procedures to identify, prevent and rectify modern slavery occurrences.
- We provided a modern slavery information pack in our supplier welcome packs, to help educate our suppliers and build an understanding of the risks of modern slavery.
- Our tender documents stipulate the need for tenderers to demonstrate modern slavery compliance in their tender response for work or services in Pacific Hydro. Our tender assessment process places modern slavery as a key evaluation criterion for selection.
- Pacific Hydro is well represented in external groups including the UN Compact Network and the Clean Energy Council's Risk of Modern Slavery Working Group. Pacific Hydro's is a permanent participant in workshops that discusses issues, trends and strategies to stamp out modern slavery.
- As a representative in CEC's modern slavery working group, Pacific Hydro has contributed to the development of a modern slavery pledge statement for CEC members to sign up to in 2022. In signing up the statement, members pledge to support and pursue actions within their enterprise and businesses to prevent modern slavery through various means including collaborating on initiatives with industry participants, agencies and civil societies.

# CASE STUDIES

## CASE STUDY 1: SUPPORTING OUR SUPPLIERS

In response to a self-assessment questionnaire in 2020, one of our high-risk suppliers (a small, regional business who supplies a significant volume of workwear and uniforms to Pacific Hydro) indicated that it did not have any modern slavery policies or procedures in place, nor had it undertaken any risk assessments in its supply chains. Whilst this company falls below the threshold for reporting under the Modern Slavery Act 2018 (Cth), we identified this as

a risk area for the business and have supported this small company to gain a deeper understanding and awareness of modern slavery risks.

In 2021, we have provided this supplier with our customised modern slavery training material and will be conducting on-going reviews, including consultation with this supplier to support them manage their risk in modern slavery.

## CASE STUDY 2: SETTING EFFECTIVE RISK MANAGEMENT CONTROLS

Tango Energy identified that one of its key risk areas is in relation to its use of offshore labour as part of its call centre and back-office operations. These arrangements require effective controls, particularly where such operations are in high-risk geographies. Tango manages this through a selection process involving due diligence activities, including on-site inspection (and face-to-face interviews with staff) and assessment.

Tango Energy requires the management teams of these third-party contractors to respond to questions in relation to their recruitment, training and management practices, and calls are monitored by Tango Energy's Quality Assurance team.

Tango Energy has also implemented clauses into its contracts requiring that sales channel partners implement modern slavery risk management processes and comply with requests from Tango Energy for information regarding modern slavery.

Tango Energy's contracts with sales channel partners also only permit offshore subcontracting where authorised by Tango Energy. Tango Energy recognises that offshore labour remains a high-risk area for the business and is committed to ensuring that effective controls are in place to manage and mitigate this risk across future reporting periods.

# CASE STUDIES

## CASE STUDY 3: ASSESSING MODERN SLAVERY RESPONSE AS KEY CRITERION IN A MAJOR TENDER

During 2020, recognising the gap in our procurement process and to mitigate the risk of modern slavery, we updated our tender documents to include a Modern Slavery Questionnaire Returnable Schedule. This Schedule must be completed by all suppliers and returned with their tender submission.

In Q1-2022, Pacific Hydro completed the tender process for the procurement of PV and BESS inverters for its Clements Gap BESS Project in South Australia and Haughton Solar Farm Stage 2 Project in Burdekin Shire, Queensland. The tender included

modern slavery requirements which were enlisted as a key criterion for selection. The evaluation process was completed with 2 suppliers failing to be shortlisted for not meeting Pacific Hydro's modern slavery requirements outlined in the tender questionnaire.

Previous tender process did not have a dedicated assessment criterion relating to modern slavery. During Pacific Hydro's debrief to unsuccessful tender participants, feedback of their shortcoming with respect to modern slavery response was provided for learning and future compliance in tender submissions.

## CASE STUDY 4: MANAGING RISKS WHEN SELECTING INFORMATION TECHNOLOGY SERVICE PROVIDERS

Tango Energy understands the potential risks involved when utilising off-shore Information Technology (IT) providers to support business functions such as billing, customer engagement and sales tools. During the selection process, Tango utilises the IT Governance Framework to assess responses to its Requests For Tender. Respondents must complete a questionnaire regarding modern slavery and submit it with their tender response.

The modern slavery questionnaire seeks to understand key features of the respondents Modern Slavery Compliance Framework such as their processes for on-going modern slavery

risk assessments, implementation of policies and procedures (including training) to mitigate against modern slavery risks, and assurance activities undertaken to manage ongoing compliance.

Responses are assessed to ensure that prospective vendors meet the minimum standards required for modern slavery compliance by Tango Energy suppliers in this category prior to formation of any supply agreement. Once Information Technology Service Providers are onboarded, Tango continually monitors risks by periodically seeking information regarding their compliance.

# IMPACT OF COVID-19

Pacific Hydro was fortunate in that none of our operational or construction projects were significantly delayed as a result of COVID-19. However, two main areas of Pacific Hydro's supply chain have been affected by COVID-19 since its onset in February 2020.

Pacific Hydro has continued to use Australian workforce of skilled labourers to execute repairs and servicing on our assets, who are occasionally supported by international technicians. Restrictions on overseas travel affected our supply chains as it became difficult to engage with manufacturers and for non-Australian based technicians to travel.

Pacific Hydro was also affected in terms of its spare parts, however most of our fleet have contracted suppliers with healthy levels of inventory. We were able to engage with our existing supplier base to get

repairs done and procure spare parts. In so doing, we could rely on our pre-COVID-19 modern slavery risk assessment for those suppliers and did not need to engage new suppliers as a result.

We have since conducted an analysis to determine the risks to specific parts of our fleet due to increased COVID-19 effect on the business and have pre-emptively purchased critical spare parts from our trusted suppliers in anticipation of any further COVID-19 impacts.

# ASSESSING OUR EFFECTIVENESS AND LOOKING AHEAD

Our key focus in 2021 has been continuing educating and improving awareness of Modern Slavery risks internally and among our key suppliers, and on reinforcing the processes and foundations to allow our modern slavery risk management to mature across future reporting periods.

We have done this by:

- Distributing a more detailed self-assessment questionnaire to suppliers operating within key risk areas, with a focus on conducting more in-depth due diligence on manufacturing locations, country of origin and past practices;
- Distributing our standard self-assessment questionnaire to the next tier of major suppliers;
- Actioning follow-up items identified through our evaluation of our top 45 supplier self-assessment questionnaires, including following up high-risk suppliers, addressing gaps in responses and building capability among our supplier base; Undertaking further due diligence of high-risk areas of the supply chain, including targeted questionnaire to determine country of origin, manufacturing locations and past practices in order to inform possible risk mitigation strategies;
- Continuing our mandatory Modern Slavery training and periodically reviewing our governance documents, processes and procedures;
- Developing a metric for assessing the effectiveness and impact of our actions and evaluating the effectiveness our 2020 and 2021 actions against those metrics;
- Actively engaging with Pacific Hydro controlled entity (Pacific Hydro Chile) and subsidiaries to undertake actions identified in the 2020 Annual Statement, including development of risk registers, and customised supplier training in native language; and
- Reviewing our current procurement process to include methodologies for understanding and assessing tenderers' approach to modern slavery.

# ASSESSING OUR EFFECTIVENESS AND LOOKING AHEAD

Our focus for 2022 is to optimise our modern slavery risk management response by seeking greater understanding of our diverse supply chain, market trends and best practices on how to work with our suppliers to mitigate them. We will do this by optimising:

## GOVERNANCE

Using Pacific Hydro's established governance framework and senior level accountability for modern slavery risk, we will introduce appropriate delegations throughout the organisation to enhance reporting and assurance mechanism for modern slavery requirements in the procurement process.

## RISK MANAGEMENT

We will continue to monitor modern slavery risk in our operations and supply chains, and incorporate any recommendations from expert groups into our enterprise risk management framework.

## UNDERSTANDING OF SUPPLIERS

We will continue to evaluate our supplier base to seek deeper understanding and transparency in order to conduct ongoing assessment and review of the current mapping across high-risk commodities.

## SUPPLIER ENGAGEMENT

We will maintain continuous engagement with suppliers on the issue of modern slavery, seeking to provide understanding and knowledge where necessary through training material.

## ENGAGEMENT WITHIN RELEVANT SECTOR AND EXPERT BODIES

We will continue our attendance and engagement with the UN Global Compact Network Australia's Modern Slavery Community of Practice forum to expand our working knowledge on the United Nations Guiding Principles on Business and Human Rights (UNGPs), and connect with peers to optimise our engagement and collaboration within our sectors. We will engage with civil societies that are active in assisting organisations understand local issues and modern slavery practices.

# CONSULTATION PROCESS WITH CONTROLLED ENTITIES

In addition to the Modern Slavery actions undertaken by Pacific Hydro Pty Ltd and its Australian subsidiaries, PHC and its Chilean subsidiaries also undertook the following actions, in consultation with representatives from the Modern Slavery Working Group:

- Implemented their own Modern Slavery Policy;
- Identified the key areas for Modern Slavery Risks in their operations and supply chain by preparing a Modern Slavery Risk Register and undertaking ongoing assessment and review of risk mapping of its supplier base;
- Provided educational training on Modern Slavery to their employees;
- Inserted clauses in their standard form contracts requiring their suppliers to declare that they are compliant with Modern Slavery laws; and
- In relation to its two joint ventures under which it owns 50% and which are operated by a separate management team, Pacific Hydro Chile SA advised the joint venture's management team of PHC's position on Modern Slavery by providing them with PHC's Modern Slavery policy and the PHC Modern Slavery Risk Register.

# AUTHORISATION

This Modern Slavery Statement was approved by the board of SPIC Pacific Energy Pty Ltd and the board of Pacific Hydro Pty Ltd in May 2022.

I issue this statement on behalf of SPIC Pacific Energy Pty Ltd and its subsidiaries as Chair of the boards of SPIC Pacific Energy Pty Ltd and Pacific Hydro Pty Ltd.

Yours Faithfully,



**Shou Rufeng**

Chair of the Board of Pacific Hydro Pty Ltd and SPIC Pacific Energy Pty Ltd

# APPENDIX A

## List Of Subsidiary Companies Of SPIC Pacific Energy Pty Ltd

### AUSTRALIA

- SPIC Pacific Hydro Pty. Ltd
- Pacific Hydro Pty. Ltd
- Pacific Hydro Finance Company Pty. Ltd
- Pacific Hydro Australia Holdings Pty. Ltd
- Pacific Infrastructure Pty. Ltd
- Pacific Hydro Finance Pty. Ltd
- Pacific Hydro Investments Pty Ltd
- Pacific Hydro Portland PPA Pty. Ltd
- Pacific Hydro Retail Holdings Pty. Ltd
- Tango Energy Pty. Ltd
- Pacific Hydro Australia Developments Pty. Ltd
- Pacific Hydro Wholesale Trading Pty. Ltd
- Pacific Hydro AFSL Pty. Ltd
- Energy Pacific (Vic) Pty. Ltd
- Ord Hydro Pty. Ltd
- Energis Australia Pty. Ltd
- Pacific Hydro Group Two Pty. Ltd
- North Western Energy Pty Limited
- Ord River Dam Hydro Partnership
- Pacific Hydro Chalicum Hills Pty. Ltd
- Pacific Hydro Portland Wind Farm Pty. Ltd
- Pacific Hydro Clements Gap Pty. Ltd
- Fremantle Wind Farm Pty. Ltd
- Pacific Hydro Haughton Landco Pty. Ltd
- Nilgen Wind Farm Pty. Ltd
- Pacific Hydro Crowlands Holdings Pty. Ltd
- Pacific Hydro Crowlands Pty. Ltd
- Pacific Hydro Yaloak Pty. Ltd
- Pacific Hydro Yaloak South Pty. Ltd
- Pacific Hydro Moree Solar Holdings Pty. Ltd
- Pacific Hydro Haughton Solar Farm Holdings Pty. Ltd
- Pacific Hydro Haughton Solar Farm Pty. Ltd
- Taralga Holdings Nominees 1 Pty. Ltd
- Taralga Land Co Pty. Ltd
- Taralga Wind Farm Nominees No 1 Pty. Ltd
- Taralga Wind Farm Pty. Ltd
- Taralga Holdings Nominees 2 Pty. Ltd
- Taralga Operating Co Pty. Ltd
- Taralga Wind Farm Nominees No 2 Pty. Ltd
- Pacific Hydro International Pty Ltd

### CHILE

- Pacific Hydro Chile SA
- Inversiones Pacific Hydro Tinguiririca SpA
- Pacific Hydro Punta Sierra SpA
- Copiapo Solar SpA
- Hidroelectrica Nido de Aguila SA
- Pacific Hydro Chacayes SA
- Hidroelectrica Cachapoal SA
- Inversiones Pacific Hydro Cachapoal Limitada



Level 13, 700 Collins Street Docklands Victoria 3008 Australia

[pacifichydro.com.au](http://pacifichydro.com.au)