



MODERN SLAVERY POLICY

ARKANA ENERGY GROUP

Version: May 2023

1. POLICY STATEMENT

- 1.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which share a common element being the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain (**Modern Slavery**).
- 1.2 We have a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 This policy sets out our commitment to:
 - (a) responsibly source goods or services to use in our business;
 - (b) ensure there is transparency in our approach to tackling Modern Slavery in our own business and throughout our supply chains;
 - (c) take action to prevent, mitigate and where appropriate, remediate the harm caused by Modern Slavery occurring in our business or supply chains; and
 - (d) comply with applicable laws and regulations including under the *Modern Slavery Act 2018* (Cth).
- 1.4 We expect the same high standards from all of our contractors, suppliers and other business partners within our supply chains. As part of our contracting processes, we endeavour to include specific prohibitions against Modern Slavery and where appropriate include due diligence processes to ensure any Modern Slavery risks are identified, assessed, addressed and where appropriate, remediated. We expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5 We do not tolerate Modern Slavery and human trafficking within our supply chain and would seek to terminate our relationship with a supplier where evidence of the same occurred.
- 1.6 This policy (including any updates) must be complied with and incorporated into the policies, procedures and operations of our own business and our supply chains.
- 1.7 This policy applies to all persons working for us or on our behalf in any capacity, including (but not limited to) employees at all levels, directors, officers, agency



workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, supply chain participants and business partners.

- 1.8 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.9 This policy is influenced by the Clean Energy Council's (**CEC**) guidance, as provided from time to time, and aims to acknowledge the specific risks within the clean/renewable energy sector. Namely, the policy acknowledges the key points of exposure as outlined within CEC's guidance, being the manufacturing of components and the extraction of raw materials. Further guidance on these risks and measures available to address them can be found on the CEC website.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that our business and supply chains comply with it.
- 2.2 The board of directors of our principal governing body, being the Executive Management Team, is responsible for approving our modern slavery statement and ensuring that it complies with the *Modern Slavery Act 2018* (Cth).
- 2.3 Each Managing Partner, or such persons appointed by a Managing Partner, (**Compliance Manager**) has primary and day-to-day responsibility for implementation of this policy, monitoring its use and effectiveness and dealing with any queries about it. Where required, the Compliance Manager's responsibilities extend to:
 - (a) monitoring and auditing internal controls and procedures, and consulting with relevant stakeholders to identify risks of modern slavery practices in our operations, including in our subsidiary organisations;
 - (b) monitoring, auditing and consulting with our contractors and suppliers to identify risks of modern slavery practices in our supply chains;
 - (c) developing measures to assess and address any risks of modern slavery, including through due diligence and contractual obligations;
 - (d) monitoring the effectiveness of those measures;



- (e) developing appropriate training materials and programs for our employees and suppliers to comply with this policy; and
 - (f) developing remediation programs and grievance mechanisms.
- 2.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training.
- 2.5 Employees and our contractors are also responsible for aiding their own understanding of this policy, participating in training, following this policy in their day-to-day activities and reporting any risks of Modern Slavery they identify in our business or supply chains.
- 2.6 Suppliers are responsible for ensuring their employees and suppliers involved in the supply of goods or services to us understand and comply with this policy.
- 2.7 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

3. COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us (e.g., our employees and contractors), on our behalf (e.g., our suppliers) or under our control (e.g., our subsidiaries). You are required to avoid any activity that might lead to a potential or actual breach of this policy or relevant laws making Modern Slavery an offence (including but not limited to, Divisions 270 and 271 of the *Criminal Code 1995* (Cth)).
- 3.3 You must notify the Compliance Manager as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.



- 3.5 Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help address coercive or exploitative work practices in their own business and supply chains.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of Modern Slavery, raise it with the Compliance Manager.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 We will provide training to all our employees on this policy. This will include training on how to identify Modern Slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of Modern Slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as an employee or a contractor.
- 4.2 Our zero-tolerance approach to Modern Slavery in our business and supply chains must be communicated to all contractors and supply chain participants at the outset of our business relationship with them and reinforced as appropriate thereafter (including by way of obligations included in the supply contract).

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy is liable to face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



6. REVIEW OF THIS POLICY

- 6.1 This policy will be reviewed as reasonably required to ensure compliance with relevant legislation.
- 6.2 This policy may be updated by us from time to time. Any updates to this policy must be complied with by our business, employees, contractors and supply chains.