



**ENERGY  
MATRIX  
GROUP**

**MARCH 2026**

# **Modern Slavery Policy**

**December 2025**

**CLASSIFICATION: AVAILABLE FOR EXTERNAL PUBLICATION**

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## Document Control Information

### Authorisation

Role	Title	Date
Owner	CEO	December 2025
Reviewer	General Counsel	November 2025
Approver	Board	December 2025

### Document History

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Mike Lauer  
Chair

Dated 31/12/2025

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## 1. Purpose

This policy establishes the framework for managing modern slavery risk in the supply chain of Energy Matrix Group Pty Limited and its subsidiaries (Energy Matrix) and sets out Energy Matrix's commitment to promoting human rights and ethical labour practices and to preventing all forms of modern slavery in its operations and identifying and mitigating where possible modern slavery in its supply chains.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and child labour and human trafficking.

Energy Matrix has a zero-tolerance approach to modern slavery.

## 2. Responsibility

The Board approves this policy and has overall accountability for it. The Board is responsible for approval of the annual Modern Slavery statement of Energy Matrix.

The Executive Team is responsible for ensuring compliance with this policy in the business. Each Line Manager is responsible for ensuring that their operations are free of modern slavery and that they monitor their supply chain for, and report, any indication of modern slavery risk in accordance with this policy. The Executive Team will ensure that all Personnel complete modern slavery risk management training and apply this policy in their jobs.

The Compliance Officer has the responsibility for implementation of this policy on a day to day basis, monitoring its effectiveness and ensuring that the appropriate training, processes and control systems are in place.

## 3. Scope

This Modern Slavery Policy applies to all Energy Matrix Personnel.

For the purpose of this policy, Personnel means:

- all directors, officers and employees of Energy Matrix and its subsidiaries; and
- all contractors engaged by Energy Matrix and its subsidiaries when performing activities on behalf of one or more of Energy Matrix's businesses.

All Personnel must comply with this policy.

This policy does not form part of any employee's contract of employment and Energy Matrix may amend it at any time.

## 4 Policy statement

Energy Matrix will not tolerate any form of modern slavery in its business and its supply chain. 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 does not occur in our own operations or and is identified and eliminated from our supply chains.

Energy Matrix will:

- responsibly source goods or services to use in our business;
- ensure there is transparency in our approach to tackling modern slavery in our own business and throughout our supply chains;
- take action to prevent, mitigate and where possible cooperate to remediate the harm caused by modern slavery occurring in our business or supply chains; and
- comply with applicable laws and regulations including under the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW) (for our operations in New South Wales) and other applicable laws relating to modern slavery.

Energy Matrix expects all of our contractors, suppliers and other business partners within our supply chains to similarly reject modern slavery practices. As part of our contracting processes, we include specific prohibitions against modern slavery and include processes to ensure modern slavery risk can be identified, assessed, addressed and eliminated from our supply chain. Energy Matrix expects that our suppliers will hold their own suppliers to the same high standards.

This Policy should be read in conjunction with our Code of Conduct and our Whistleblower Policy and, for Personnel, our human resources policies and procedures.

## 5. Reasonable Steps

Energy Matrix is committed to taking reasonable steps in the context of our business, industry sector and supply chains to identify and prevent modern slavery.

Energy Matrix's key focus areas to prevent modern slavery are as follows.

**Risk** – assess our supply chain and operations for modern slavery risk as part of the risk management framework. Energy Matrix maps its supply chain risk and monitors the scale and scope of the modern slavery risk (see section 6.2 below). We have engaged “Fair Supply” to assist Energy Matrix to manage modern slavery risks in our business.

**Procurement** – integrate anti-modern slavery practices into our procurement process (as set out in more detail under section 6.2 below). Primarily this is through appropriate the inclusion of modern slavery clauses in contracts and modern slavery self-assessment questionnaires and other due diligence of our suppliers. The intention is to develop our procurement processes further and incorporate modern slavery assessment into sourcing strategies and incorporate a Supplier Code of Conduct into contracting processes.

**Training** – Energy Matrix commits to training of its staff to raise awareness about the signs of forced labour, human trafficking and other forms of modern slavery and to reinforce the commitment to ethical practices.

**Grievance mechanism and Remediation**

If any actual or suspected modern slavery practices are identified Energy Matrix encourages Personnel or suppliers and third parties to report them – see section 6.3 below.

Where Energy Matrix believes that a supplier is engaged in modern slavery action will be taken ranging from reporting suspected breaches of law to authorities, to implementing process change to support improved our procurement practices to refusal to trade.

**Data and reporting** – collect data allowing us to assess modern slavery risk and contract in a way that frustrates modern slavery practices (including by conducting supplier questionnaires and writing contracts with anti-modern slavery clauses). Report to the CEO and the Board on modern slavery matters and escalate any suspected modern slavery risks or non-compliances. We are required to annually provide a Modern Slavery Statement to the Federal Attorney General's office which must be approved by the Board.

Improvement – Energy Matrix is using the above measures and the lessons learned from its modern slavery management programme to continuously improve its management of modern slavery risks.

## 6. Energy Matrix Group

### 6.1. Our operations

Energy Matrix does not use any contract labour entities, nor does it have offshore employees. Energy Matrix does not and will never withhold identification papers of employees. Similarly, Energy Matrix does not deduct or withhold wages, impose security deposits or sureties, and does not impose fines for unmet productivity standards or misconduct. All employees are provided with written contracts in accordance with Fair Work Standards. The pay of all employees meets or exceeds the national minimum wage and complies with award conditions (where applicable).

Energy Matrix does not use child labour and complies with national minimum age work standards. Worker age is normally evident in the hiring and interviewing process, however, if ever there is doubt, Energy Matrix will seek verification and require documentary evidence of proof of age. Energy Matrix complies with the UN International Labour Organization conventions in relation to child labour.

All employees are required to undertake induction and training before they are able to perform their duties. The induction training includes awareness of corporate policies and procedures which includes, but is not limited to, measures to identify and manage modern slavery risk.

### 6.2. Our suppliers

Energy Matrix is committed to engaging with its stakeholders and suppliers to address the risk of modern slavery in its supply chains. All suppliers must comply with this Modern Slavery Policy (or an equivalent policy) and provide details of measures they have taken to ensure compliance.

Energy Matrix expects its suppliers and subcontractors to share the same commitment to eradicating forced labour, human trafficking and other modern slavery practices. Suppliers are required to adhere to ethical labour practices and provide assurances that they do not engage in unethical activities.

Energy Matrix takes a risk-based approach to its contracting processes and keeps all contracts under periodic review. Energy Matrix is updating its contracts with third parties to include specific prohibitions against the adoption of modern slavery practices and use of trafficked labour.

Following a desktop supplier assessment, Energy Matrix may ask the supplier to complete an anti-modern slavery questionnaire. The questionnaire requires the supplier to provide assurance and evidence that their supply chains are free of modern slavery. The questionnaire requests details about their internal policies and procedures and due diligence activities employed by the supplier to identify, prevent and mitigate modern slavery risks in their operations and supply chains. It also requests information about screening of their suppliers.

Energy Matrix may further assess a supplier's arrangements by writing to the supplier on an individual basis to check their compliance with standards required to combat modern slavery and trafficking or to follow up on their improvement initiatives. As part of Energy Matrix's ongoing risk assessment and due diligence processes, it will consider whether circumstances warrant further due diligence of its suppliers to ascertain their modern slavery compliance.

If Energy Matrix determines that individuals or organisations working on its behalf have breached our modern slavery standards, appropriate action will be taken as discussed elsewhere herein.

Energy Matrix's suppliers are obliged to demonstrate that they are implementing measures to eradicate the possibility that their supply chains could be linked to modern slavery.

Consistent with Energy Matrix's risk-based approach, Energy Matrix may require:

employment and recruitment agencies and other third parties supplying personnel to Energy Matrix to confirm their compliance with the Energy Matrix policy; and/or

suppliers engaging workers through a third party to obtain that third party's agreement to comply with Energy Matrix's modern slavery policies.

### **6.3. Grievance mechanisms**

Employees or individuals who become aware of any actual or suspected violation of this policy are encouraged to report such actual or suspected

violations to the General Counsel at:

[company.secretary@energymatrix.com.au](mailto:company.secretary@energymatrix.com.au)

An effective, confidential grievance mechanism for staff is established through Energy Matrix's Grievance Procedure to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind, regarding matters related to slavery and human trafficking.

For Energy Matrix's suppliers and other third parties any grievances or modern slavery issues should be reported to the General Counsel as set out above or in accordance with our Whistleblower Policy (available on our website) under which any modern slavery matters can be reported by third parties, or by Personnel.

## 7. Breach of this Policy

It is the responsibility of all Personnel, to report any breach of this policy, or any matter of concern, to their Line Manager or to a member of the Executive Team for investigation and action as required.

The prevention, detection and reporting of modern slavery is the responsibility of all Personnel.

A breach of this policy may lead to disciplinary action up to and including termination of employment.

## 8. Related and Supporting Documents

This policy is related to:

- Governance Policy
- Code of Conduct
- Compliance Policy and Energy Matrix business compliance procedures

## 9. Document management and review

### 9.1. Document owner

The Board owns this policy and is responsible for the approval of its content.

## 9.2. Review

This policy will be reviewed by the Board at least once in every three year period.



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