



Modern Slavery Policy

1. Scope

This policy applies to all officers and employees (together, **associates**) who perform services for or on behalf of Edify Group Holdings Pty Ltd and its subsidiaries (together, **Edify**).

2. Purpose

Edify recognises that businesses have obligations to prevent slavery, slavery-like practices and human trafficking and that it has an important role to play with respect to its operations and supply chains. Edify take these obligations seriously and is committed to its role in the elimination of modern slavery.

This Modern Slavery Policy (**Policy**) provides information on modern slavery and describes how Edify respects the right of all workers within our operations and supply chains to be free from modern slavery.

While Edify is currently not required to formally monitor or report under the *Modern Slavery Act 2018* (Cth) (the **Act**), we have elected to develop and implement this Policy to ensure we are taking appropriate steps to minimise the modern slavery risks within our operations and supply chains. Edify also acknowledges that many of our stakeholders (including offtakers, government agencies and lenders) are subject to the Act.

3. Background

3.1. What is modern slavery?

Modern slavery generally describes situations where offenders use violence, coercion, threats or deception to force an individual to work or do other things that undermine their freedom.

Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- child labour.

3.2. Edify's supply chains

Edify's supply chains can be broken down into two general categories:

- A. Supply chains that are used for Projects:



- under development by Edify,
- in which Edify has an equity stake, or
- are under Edify's management as asset manager.

B. Supply chains that are used for providing for the corporate services necessary for the functioning of our business.

Activities in our project supply chains include desktop studies, field-based feasibility studies, large-scale construction projects and minor construction and maintenance works for operational assets. While these are all conducted within Australia, many of Edify's construction activities rely on global supply chains in relation to capital, plant or labour.

Through our corporate activities, Edify procures goods and services from external suppliers necessary for the day-to-day functioning of the company, such as information technology services and stationery.

3.3. Supply chain risks

While the risk of modern slavery in Edify's operations is low, risks of modern slavery practices exist within our supply chains. We have undertaken an assessment of the main areas of exposure to modern slavery risks within Edify's supply chain and operations, as summarised below:

Area	Potential Exposure
IT Hardware / Services and Electronic Equipment	<p>Our corporate activities require a range of computer and telecommunications hardware and services, including to support our corporate operations. Modern slavery risks are present in the supply chains that provide IT companies with the necessary materials to produce electronic goods, and parts of those goods.</p> <p>Modern slavery risks may also be associated with our suppliers and the use of offshore contact centres and other services by telecommunications companies and the construction and maintenance of telecommunications infrastructure.</p>
Construction	<p>Certain manufacturing and mining regions and materials carry higher risks of modern slavery, including where materials may be produced or sourced in higher risk countries or involve sectors known to have high modern slavery risks.</p> <p>For example, our projects require building materials such as concrete, timber, steel and solar panels, which may involve modern slavery risks due to the way these materials are produced or manufactured.</p> <p>Our contractors also procure a range of machinery and equipment used in construction, which can involve modern slavery risks if they</p>



Area	Potential Exposure
	<p>are manufactured in or include components manufactured in high-risk countries.</p> <p>Similarly, mining operations for copper, lithium, tin, lead, quartz, silicon, selenium, tellurium, arsenic, cadmium, aluminium, boron, gallium or indium, can involve modern slavery risks related to the exploitation of miners, including the worst forms of child labour. Therefore, any equipment containing components that include these minerals may involve modern slavery risks. There is also increasing evidence with respect to the risks of modern slavery in the manufacture of polysilicon, which is a key component of solar panels.</p>

We will regularly review our modern slavery risks to identify new or emerging risk areas.

4. Requirements

4.1. How we reduce the risks of modern slavery

Below are our key actions to address modern slavery risks.

Area	Potential Exposure
Understand modern slavery risks	Associates are required to familiarise themselves with this Policy. Our associates are expected to undertake Modern Slavery Awareness Training when directed.
Contractual obligations	<p>Where appropriate, we include obligations in key new contracts requiring our contractors to:</p> <ul style="list-style-type: none"> • comply with modern slavery laws; • ensure that the contractor's personnel and supply chain participants comply with modern slavery laws; and • provide Edify with such access, information and documentation reasonably required to permit Edify to undertake due diligence on its supply chain.
Supplier due diligence and engagement	<p>Where appropriate, we review suppliers' modern slavery procedures and statements.</p> <p>We enquire about suppliers' approach to addressing modern slavery risk during the RFP and evaluation stages, including asking suppliers about their due diligence practices in respect of</p>



Area	Potential Exposure
Ongoing supplier engagement	<p>manufacturing processes and their own supply chains.</p> <p>We review suppliers' modern slavery statements and engage with suppliers about how they are monitoring their own modern slavery risks on an ongoing basis.</p> <p>At a minimum, we expect our suppliers, service providers and contractors to:</p> <ul style="list-style-type: none"> • comply with all applicable laws and regulations; • pay fair wages in line with legislation and awards for the industry and market; • treat those who work for or on behalf of its business with dignity and respect, proactively ensuring a safe environment free from discrimination, harassment and victimisation; • oppose modern slavery in all forms; and • monitor supply chains on a continual basis for compliance with the above requirements and to promptly investigate any suspected non-compliance of the above within its supply chain.

4.2. What to do if modern slavery is suspected

Edify is committed to acting ethically and with integrity in all business dealings and to preventing modern slavery and human trafficking in our business or our supply chains.

Staff are encouraged to raise concerns about any suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

Staff should report any suspected instances of modern slavery to the Compliance Officer or to their manager as soon as possible.

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.

5. Roles and responsibilities

Role	Responsibility
Board of Directors	Responsible for approving this Policy and promoting a culture of compliance with a zero tolerance for any forms of modern slavery.
Chief Executive Officer	The owner of this Policy and responsible for promoting a culture of



Role	Responsibility
	compliance with a zero tolerance for any forms of modern slavery.
Management Team	Responsible for ensuring that the governance structures and procedures are adequate to meet the requirements of this Policy.
Compliance Officer	The author of this Policy. The contact person within Edify for questions relating to this Policy, monitoring compliance with this Policy, and receiving and investigating reports of possible violations of this Policy.
Employees	Responsible for always complying with this Policy. Completing any training requested. Completing all compliance monitoring requests.