

# Modern Slavery Policy (v3.0)

## VERSION HISTORY

Rev No.	Date	Revision Description	Approval
1.0	11 November 2019	Creation of new policy following the introduction of <i>Modern Slavery Act 2018</i> (Cth).	Chief Executive Officer 6 December 2019
2.0	March 2020	Policy update in line with external review.	Chief Executive Officer 13 May 2021
2.1	April 2022	Administrative Only Amendments	Acting Company Secretary / General Counsel 29 April 2022
3.0	July 2024	Periodic review and update.	Chief Executive Officer 20 November 2024

## AUTHORISATIONS

<b>Prepared by:</b>	Legal Counsel	July 2024
<b>Reviewed by:</b>	Legal, Risk & Compliance Manager	July 2024
<b>Endorsed by:</b>	Company Secretary/General Counsel	November 2024
<b>Approved by:</b>	Chief Executive Officer	20 November 2024
<b>Next review due:</b>	3 years	November 2027

## CONTACT FOR ENQUIRIES (POLICY OWNER)

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## 1. Introduction

Aurora Energy is committed to operating ethically and in compliance with Modern Slavery Laws applicable in Australia, including the *Modern Slavery Act 2018* (Cth).

## 2. Purpose

The purpose of this Policy is to:

- a) minimise the risk of Modern Slavery occurring within Aurora Energy, its supply chain or in any other business relationship;
- b) demonstrate Aurora Energy's commitment to only doing business with suppliers who fully comply with laws relating to modern slavery, including any applicable requirements under the *Modern Slavery Act 2018* (Cth); and
- c) ensure Aurora Energy's compliance with the reporting requirements under the Modern Slavery Act.

## 3. Scope

All employees and contractors are responsible for complying with this Policy.

## 4. Definitions

<b>ALT</b>	Aurora Energy Leadership Team
<b>BARCC</b>	Board Audit, Risk & Compliance Committee
<b>Contract Owners</b>	The person who is ultimately responsible for the management of a contract.
<b>Modern Slavery</b>	Forced labour, bonded labour, human trafficking, child labour, debt bondage and any other slavery like practices prohibited under Modern Slavery Laws.
<b>Modern Slavery Act</b>	<i>Modern Slavery Act 2018</i> (Cth)
<b>Modern Slavery Laws</b>	The <i>Modern Slavery Act 2018</i> (Cth), Divisions 270 and 271 of the <i>Criminal Code Act 1995</i> (Cth), and any other laws or regulations prohibiting or regulating Modern Slavery, applicable in Australia.

## 5. Policy

### 5.1. Policy Provisions and Principles

This Policy is designed to govern Aurora Energy's compliance with Modern Slavery Laws. Aurora Energy will meet the requirements under Modern Slavery Laws in three ways:

- a) in the procurement of goods and services;
- b) through contract management, due diligence and monitoring key suppliers; and
- c) through preparation and submission of the annual modern slavery statement.

These areas are outlined in more detail below.

## 5.2. Conducting Procurement of Goods and Services

Aurora Energy's procurement framework is the primary mechanism through which key suppliers are engaged by Aurora Energy. It is therefore important that the procurement framework provides for due diligence on these suppliers and their compliance with Modern Slavery Laws to the extent practically possible. Aurora Energy is committed to ensuring it only sources goods and services from entities that comply with Modern Slavery Laws. As part of this commitment, Aurora Energy expects its suppliers to make the same commitments and take reasonable steps to ensure these principles are followed throughout their supply chains.

The extent of the due diligence conducted in a procurement will depend on the types of goods or services being sourced, Aurora Energy's reliance on the supplier, as well as their geographical location. Examples of the due diligence that may be conducted include requesting:

- attestation that the supplier complies with the *Modern Slavery Act 2018* (Cth);
- a copy of the supplier's most recent modern slavery statement;
- details of the structure and operations of the supplier's supply chain; and/or
- details of the actions taken by the supplier to manage, address and, where necessary, remediate modern slavery risks in their business and supply chain.

If an Aurora Energy proposed contract is included as part of the procurement, it will include a provision requiring compliance with Modern Slavery Laws (refer to Section 5.3).

## 5.3. Contract Management and Monitoring Key Suppliers

Following a risk-based approach, Aurora Energy will seek agreement from its key suppliers to the inclusion of Modern Slavery provisions in key supplier contracts. Such provisions will include:

- a requirement to comply with Modern Slavery Laws applicable in Australia;
- a requirement to take reasonable steps to ensure that there is no Modern Slavery in the supplier's supply chains or any subcontractor's supply chains; and
- a requirement to notify Aurora Energy if the supplier becomes aware of any actual or suspected breach of Modern Slavery Laws in a supply chain connected to their agreement with Aurora Energy.

Contract Owners, in conjunction with the Legal Team, are responsible for conducting annual reviews on key suppliers to identify, monitor and manage their compliance with Modern Slavery Laws.

Aurora Energy will work collaboratively with its key suppliers to identify, monitor and manage Modern Slavery risks in their operations and supply chains, and develop commercial and actionable solutions. Following a risk-based approach, Aurora Energy will discontinue arrangements with suppliers where it is apparent that those suppliers have not taken, or are not willing to take, reasonable steps to prevent or specifically prohibit Modern Slavery in their business operations.

## 5.4. Modern Slavery Statement Preparation, Endorsement and Approval

The *Modern Slavery Act 2018* (Cth) requires that an annual modern slavery statement be prepared and approved for each financial year. The Legal Team will be responsible for the preparation of Aurora Energy's modern slavery statement. The modern slavery statement will be approved by the Board and signed by a member of the Board. The modern slavery statement must be submitted to the Attorney-General's Department prior to 31 December each year.

## **6. Key Stakeholder Responsibilities**

### **6.1. Board & BARCC**

The Board is responsible for approving and signing the annual modern slavery statement on the recommendation of BARCC.

### **6.2. Chief Executive Officer**

The CEO is responsible for approving this Policy in accordance with the Aurora Energy Policy Framework and ensuring adequate and robust policies and procedures are in place to ensure the Policy is effectively implemented.

### **6.3. Aurora Energy Leadership Team**

Members of the ALT are responsible for the implementation of policy obligations throughout their respective areas of the business.

### **6.4. Legal Team**

The Legal Team has overall responsibility for the implementation and management of this Policy and will:

- provide training to employees (particularly Contract Owners and those involved in sourcing goods and services) in relation to the obligations under this Policy and Modern Slavery Laws;
- following a risk-based approach, seek agreement from key suppliers to the inclusion of Modern Slavery provisions in key supplier contracts and provide advice to Contract Owners in instances where suppliers are not willing to accept such provisions;
- partner with Contract Owners to monitor key suppliers and their compliance with Modern Slavery Laws (including by way of annual questionnaire);
- oversee procurement activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with Modern Slavery Laws;
- provide advice in circumstances of a suspected instance of Modern Slavery (or a supplier's suspected instance of Modern Slavery) or non-compliance with this Policy; and
- prepare the annual modern slavery statement for approval.

### **6.5. Contract Owners**

Contract Owners must monitor key suppliers regularly to ensure they maintain compliance with Modern Slavery Laws.

## **7. Non-compliance with this Policy**

All non-compliances with this Policy will be recorded in accordance with the Compliance Policy.

Any non-compliances that are risk-rated as Severe or Major will be escalated to the Board or a relevant Board Committee through Aurora Energy's non-compliance reporting processes.

Non-compliances that are risk-rated as Moderate or Minor will be reported to the Chief Executive Officer.

Incidents of wilful non-compliance with this Policy are considered to be serious and will be dealt with in accordance with Aurora Energy's normal performance management process, which may include dismissal.

## 8. Related Policies

- People & Culture (P&C) Charter (Lead Policy).
- Compliance Policy.
- Procurement Policy.
- Contract & Supplier Management Policy.
- Supplier Code of Conduct.

## 9. Precedence

In the event of a conflict between policies, the following precedence will apply in this order to the extent of any inconsistency:

- Board approved Policy.
- CEO approved Policy.
- Business approved Procedure.
- Business approved Work Practice.

## 10. Policy Approval and Review

The CEO is responsible for approving this Policy at least every three years, or earlier if a significant change occurs that may impact the Policy.

## 11. Whistleblowing Statement

In extreme circumstances an individual may be concerned that a serious breach of this policy has occurred but considers that it would be personally damaging to pursue it through normal channels. In such circumstances the individual should refer to Aurora Energy's Public Interest Disclosure Policy for information about how to report such a concern and to whom.

Aurora Energy's Public Interest Disclosure Policy ('whistleblowers' policy) is based on the Public Interest Disclosures Act 2002. This Policy is available on both Aurora Energy's external website and its internal intranet.

Delegated Officers under the Public Interest Disclosure Policy will do all that is possible and practicable to ensure the identity of the individual and the identity of the person who is the subject of the disclosure are kept confidential.

## 12. Publication

This Policy is approved for publication on Aurora Energy's website.

**Approved by the Chief Executive Officer on 20 November 2024.**



**Chief Executive Officer**