



'Nobody is Free, until  
Everybody is Free.'

*Fannie Lou Hamer*



Collgar Wind Farm  
**Modern Slavery Statement**  
2022

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# *Acknowledgement of Country*

Collgar Wind Farm respects and honours First Nations Elders past, present and emerging. We acknowledge the stories, traditions and living cultures of First Nations Peoples of the land on which our site is located and commit to building a brighter future together.

# Statement on the Reporting Entities

This Modern Slavery Joint Statement (“Statement”) is made in accordance with the *Australian Modern Slavery Act 2018* (Cth) (“the Act”). It applies to and describes the steps taken by all Reporting Entities owned or controlled by CWF Holdings Pty Ltd (“CWFH”) during the financial year ending 31 December 2022, to identify and mitigate modern slavery in its operations and supply chains. The Statement addresses the risk of slavery, servitude, forced or compulsory labour, forced marriage, and human trafficking taking place in the Reporting Entity’s supply chains and business operations.

CWFH, together with the entities it owns or controls (the **Collgar Group**), are Australian proprietary companies registered in Victoria, with principal places of business in Perth, Western Australia. The Collgar Group is wholly owned by the Retail Employees Superannuation Trust. The ownership structure is depicted through the diagram below, with a more detailed description of the corporate structure in the About Us section.



CWFH, Collgar Wind Farm Pty Ltd, and the Collgar Community Fund Pty Ltd form a tax consolidated group. Both CWFH and Collgar Wind Farm Pty Ltd are a Reporting Entity for the purposes of the Act; each being an entity with annual consolidated revenue >\$100M.

The Collgar Community Fund is not a Reporting Entity, although it has been consulted in the preparation of this Statement.

## The Reporting Entities

ACN 130 586 088 | Collgar Wind Farm Pty Ltd

ACN 142 083 323 | CWF Holdings Pty Ltd

# A Message from our Chair and CEO

As the largest wind farm in WA, Collgar is very proud of its response to important social issues, including operating ethically and responsibly so that we can protect the people, communities, and environment in which we operate.

In 2022, we continued to take action to address modern slavery risks, as underpinned by our values and strong commitment to upholding human rights.

At Collgar, we know that all businesses have a key role in supporting the eradication of modern slavery, including forced labour, child labour and human trafficking in operations and supply chains.

However, we appreciate that this is not a simple task. We understand that modern slavery is a multifaceted and global issue, and that these practices are often concealed several layers down the supply chain where vulnerable people are being exploited through coercion, deception, and threats.

We will continue to evolve our approach for managing this risk and are committed to working with our peers, suppliers and consulting with experts as needed.

At Collgar, we take our responsibility to protect the human rights of people and communities in our supply chains seriously.

*This Statement was approved by the Boards of CWFH and Collgar Wind Farm in their capacity as principal governing bodies of CWFH and Collgar Wind Farm on 27 June 2023, and is signed by Tony Iannello in his role as each Board's Chair.*



*Thomas Scott-Morey  
Chief Executive Officer*



*Tony Iannello  
Chair*

A handwritten signature in blue ink that reads "Tony Iannello".

**Tony Iannello**

Chair

CWF Holdings Pty Ltd

Collgar Wind Farm Pty Ltd

# About Us

## Our Structure

CWF Holdings Pty Ltd  
ACN 142 083 323

(CWFH)

CWFH is Collgar's immediate holding company and its activities are limited to holding investment and interest in Collgar on behalf of the ultimate shareholder.

All procurement for CWFH is undertaken by the operating entity, Collgar, and is limited to procurement of professional services in relation to the preparation and audit of its annual financial statements as required under the Corporations Act. Given CWFH has no operations or supply chain of its own, there is limited capacity to meaningfully leverage or influence change in its supply chain. Any reporting in this Statement which describes activities undertaken by Collgar for the benefit of or on behalf of CWFH, if any, have been noted accordingly.

Collgar Wind Farm Pty  
Ltd  
ACN 130 586 088

(Collgar, Collgar Wind  
Farm, or the Company)

Collgar is the operating entity of a wind farm in Merredin, Western Australia. This Statement refers primarily to the operations, supply chains and activities undertaken by Collgar to identify and mitigate the risks of modern slavery in its operations and supply chains.

More details on Collgar's operating activities are provided in the About Us – Our Operations and Supply Chain section.

Collgar Community  
Fund Pty Ltd  
ACN 155 359 443

(CCF)

The CCF is a wholly-owned subsidiary of Collgar. CCF's sole purpose is to serve as the Trustee of the Collgar Community Trust, which receives an annual contribution from Collgar. The CCF's activities are limited to governing the approval of grants to not-for-profit organisations who undertake projects and programs benefitting the local community.

Special consideration has been given to whether there are unique modern slavery risk exposures related to the activities of CCF. Collgar has considered the regional location of the grant recipients, the size of grants awarded, and the types of activities the funding supports. The Wheatbelt region of Western Australia has not been identified as a jurisdiction at higher risk for modern slavery and the grants do not fund large scale development projects, which can attract higher exposure to modern slavery risks through complex supply chains. As such, this Statement has not included assessment of modern slavery risks and impacts for the activities undertaken by the CCF.

Collgar Wind Farm is an Australian renewable energy business with its generation facility in Merredin, Western Australia. Collgar's major service providers and entire customer base are also located in Western Australia.

Collgar's primary operating activities include management of the wind farm's site operations and maintenance activities, wind energy generation, and energy trading into the wholesale electricity market. Built over a land envelope of 18,000 hectares (on land leased to the project by Merredin farmers), the wind farm is the largest capacity wind power generator in Western Australia.



Throughout the project's construction phase, and now in the operational phase, community consultation and engagement remains a critical element. We ensure relevant stakeholders and the wider Merredin community are kept informed of project news through media coverage, website updates and information sessions.

Collgar has a relatively small supply chain. Many of our suppliers are micro-businesses or sole traders with small annual spends across several procurement categories including:

- Construction and maintenance works
- Utilities
- Professional services
- Management services
- Labour Hire services
- Financial services
- Plant and equipment
- ICT

We have long-term, stable relationships with our suppliers, particularly with those providing management services and oversight and maintenance of our wind turbines; our energy retailers and electricity network providers; other legal, risk and finance advisors; our financial service providers; as well as suppliers of products and services used to support our operations including IT equipment, personal equipment and clothing, and specialist wind farm equipment.

## Significant Activities During the Reporting Period

On 30 September 2022, Collgar entered into a Services Agreement with Collgar Renewables Pty Ltd (CRPL) for provision of professional management services in achievement of its business objectives, primarily being the generation and offtake of renewable energy via the wind farm (the **Restructure**).

After the Restructure, all Collgar employees transferred to CRPL. As at the end of the reporting period, Collgar has no direct employees, and for completeness, CRPL is not a reporting entity.





## Supply Chain

### Direct Suppliers in 2022: 213

80.5% of total spend went to 5 suppliers of goods or services:

- **O&M Service Provider: 44.2%** (Labour located in Australia, majority of parts are manufactured in Denmark or sourced from Germany, UK, Spain, Russia, Italy, Turkey, China, India, USA, Argentina, Brazil or Mexico)
- **Energy Market Fees: 17.5%** (Aus)
- **Utilities: 10.6%** (Aus)
- **Management Services: 6.0%** (Aus)
- **Voltage Regulation Equipment: 2.2%** (Aus, USA)

## Team

### # of Direct Employees: 0

Collgar and CWFH's long-term service providers employ teams in Australia, with the majority of contractors located in Western Australia.\*

### # of Direct Contractors of Long-term Outsourced Service Providers:

- Managed Services Provider (~20)
- O&M provider (~15)
- Bookkeeping (~5)
- Payroll (~5)
- IT Management (~5)

\* The O&M contractors servicing the wind farm perform these duties on site in Merredin, Western Australia. Other O&M contractors providing support for the SCADA control system, technical and engineering issues, and product development are located throughout Australia, Denmark, or India.

## Operations

### Registered as an Australian proprietary company in Victoria

### Wind Farm: Merredin, Western Australia

- Renewable energy generator connected to WA's SWIS network
- 111 Vestas V90 wind turbines with a total power production capacity of 222 megawatts, generating between 630-750 gigawatt hours per year.
- Renewable energy generation powering approximately 150,000 West Australian homes per year.

## Customer Base

Collgar supplies **renewable energy** to the WA wholesale electricity market as part of an offtake agreement, which is then retailed **direct to consumers in Western Australia**.



## Modern Slavery Governance

Collgar and CWFH's corporate governance framework includes Board responsibility for setting a culture that ensures we embed the protection of human rights into our business practices. This is achieved through Board approved policies relating directly, or indirectly, to modern slavery.

The Audit and Risk Committee meets quarterly and is accountable for ensuring Collgar maintains a robust and effective risk management program, which includes identifying, assessing, and mitigating the risk of modern slavery in our operations and supply chains. Each quarter the Committee reviews and discusses Collgar's risk register, including modern slavery activities and risk mitigation strategies.

Collgar's contractual arrangement with its management services provider requires that CRPL adheres to and adopts the same policies and approach for managing modern slavery risks as established by Collgar.

This is supported by a leadership team who lead by example and encourage the broader team to openly discuss and consider human rights issues. CRPL is also obligated to ensure appropriate resources are available to support achievement of Collgar's objectives, including implementation of the Modern Slavery Roadmap and action plan.

# Our Policies

Collgar has several policies and processes to help identify and manage potential modern slavery and labour rights risks. The following policies reference our commitment to responsible and ethical business practices and protecting human rights generally.

## Modern Slavery Policy

Our Modern Slavery Policy provides a robust framework for managing modern slavery risks and ensuring compliance with the reporting requirements of the Act.

The policy outlines our commitment to the ongoing identification, assessment and mitigation of modern slavery risks and potential impacts of our activities on the people working in our operations or extended supply chain; actively working to eliminate modern slavery practices from our operations, business partnerships and supply chain; and ensuring continuous improvement to enhance due diligence and transparency around reporting on modern slavery risks.

Additionally, the policy aims to promote a culture where contractors have the skills, support, and resources to carry out their modern slavery risk management responsibilities.

Our Modern Slavery Policy was approved by Collgar's Board which has accountability for ensuring the policy and its implementation complies with our business objectives and legislative reporting requirements.

## Whistleblower Policy

Collgar encourages the reporting of any instances of suspected wrongdoing; unethical, illegal, fraudulent, suspicious, improper, or undesirable conduct involving our business, and will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage, or reprisal.

This policy ensures compliance with Australian workplace legislative frameworks including corporate governance, whistleblower, work, health & safety, and employment legislation. It sets out the types of behaviours and conduct, which will be taken to constitute wrongdoing and 'Reportable Conduct', how to make a disclosure, to whom disclosures may be made, and how Collgar will address and manage disclosure reports.

The policy is accompanied by guidance material for whistleblowers and Eligible Recipients of disclosures.



## HSEQ Policy

Collgar's Health, Safety, Environment and Quality policy documents our commitment to providing a safe and healthy work environment in compliance with State and Federal work, health and safety legislation. This commitment to health and safety aims to build a culture that encourages everyone in the workplace to take responsibility for maintaining a safe and healthy workplace.

The policy supports compliance with the Australian health and safety and employment framework.

## Sustainable Procurement Framework

During 2022, Collgar undertook to develop a Sustainable Procurement Policy and Framework to ensure procurement activity is focussed on maximising environmental, social, and economic outcomes over the asset's lifecycle. Pending approval, the document will outline Collgar's sustainable procurement objectives, expectations, processes, and practices in support of achievement of its ESG aspirations through its procurement activities.

Collgar has also amended material contracts by including specific clauses to address modern slavery risks.

# Modern Slavery Risks



## Identifying and taking action to address risks of modern slavery practices in our operations and supply chains

Our focus in 2022 was to gain a deeper understanding of the risks of modern slavery practices in our operations and supply chains, and to manage modern slavery risks arising out of key business activities undertaken during the year.

We embedded modern slavery risk management enablers into our major commercial activities, including contractual arrangements with two Tier 1 suppliers. These contract clauses provide Collgar with the power to audit and review Tier 1 suppliers' policies and frameworks for managing modern slavery risks in their supply chains, to further inform our own due diligence efforts.

We continued to promote our Modern Slavery Policy and expectations to parties involved in these activities and worked with suppliers to identify and manage modern slavery risks.

We also carried forward our modern slavery training for all new employees and Directors and agreed to rollout refresher training modules to ensure our team is equipped to identify and manage the risks of modern slavery throughout our operations and supply chain.

# Operational Risks

## Employment

Collgar employed a workforce until October 2022, when the Restructure was completed and employees transferred to the new employer, CRPL. After the Restructure, Collgar no longer employed any staff.

While employed by Collgar, employees were part of a well-developed employment system, designed to provide flexibility and certainty for employees. Our team actively engaged with subject-matter experts relating to employee relations, employment legislation, immigration, and whistleblower laws. This ensured hiring practices, workplace policies, treatment of employees, and a variety of other factors complied with all relevant laws.

Collgar raised awareness, conducted training, and built capability to ensure its team of people were aware of Collgar's policies and standards. Appropriate training supported the expectation that employees could identify and assess risks and were equipped to respond appropriately. Employees were also required to complete modern slavery training modules and expected to speak up if any behaviours were inconsistent with Collgar's values.

After consideration of various factors relating to the direct employment of Collgar's workforce for the period up to October 2022, particularly employee location and types of services provided, the risk of modern slavery in Collgar's direct operations was assessed as low.

## Safe and Fair Workplace

The key human rights consideration in Collgar's direct operations is ensuring we maintain a safe and fair workplace for all workplace participants including all contractors, suppliers and visitors.

Prior to the Restructure, Collgar sought advice from the Chamber of Commerce and Industry on allowance provisions to ensure alignment with award conditions, legislative obligations, and industry best practice. As a result, Collgar changed its payroll frequency from monthly to fortnightly to align with award conditions.

The Company also consulted extensively with workplace participants on workplace reforms and changes relating to sexual harassment and equal employment opportunity obligations to promote a safe and fair workplace where individuals understand their obligations and the avenues available to them to escalate concerns.

## COVID-19

We recognise the ongoing impact of the COVID-19 pandemic on our team, and the safety and wellbeing of our people, key stakeholders and the broader community is our priority.

During 2022, Collgar was classified as an essential services provider and employees were covered by WA's Critical Infrastructure Worker (Restrictions on Access) Directions. This required all employees to be fully vaccinated, including boosters. The State Government's mandatory vaccination policy was rescinded on 5 April 2023.

Collgar continued to update and maintain appropriate measures to ensure business continuity, while managing the risks to all workplace recipients and protecting community wellbeing. All measures implemented by Collgar during 2022 abided with the Commonwealth and State laws and recommendations. Employees were encouraged to maintain social distancing and minimise unnecessary contact with stakeholders by using available technology and facilities to engage in normal business interactions.

Further COVID-19 measures to ensure a safe workplace included:

- Reimbursement of CBD public parking fees to minimise workplace participant exposure to infection risks from public transportation;
- Office visitor protocols, including mandatory check-ins, use of face masks, proof of vaccination status, and temperature checks;
- Encouraging remote working, if possible, and providing necessary equipment to ensure a safe home office;
- Investment in COVID-19 related safeguards including PPE, hand sanitisers, face masks, RAT testing kits, and temperature check devices to detect infection and protect all workplace participants and the broader community;
- Information campaigns regarding the government mandates covering the critical infrastructure industry.

Collgar also worked closely with its O&M service provider to ensure appropriate measures were followed with regard to COVID-19 mandates and best practices.

## Post-Restructure

Policies almost identical to those of Collgar's were adopted by CRPL, including those relevant to managing modern slavery risks. CRPL is obliged to undertake business activities in accordance with Collgar's business plan and to ensure its employees comply with Collgar's policies while providing management services.

This arrangement ensures that the quality and standard of modern slavery risk management is preserved beyond the Restructure.



## Supply Chain Risks

Collgar engaged external human rights consultants to help identify, establish, assess, and prioritise our Tier 1 (direct) suppliers for modern slavery risk indicators. Collgar has a higher proportion of medium and small suppliers (i.e., micro businesses or sole traders with spend below \$50,000), which presents a different modern slavery risk profile to Collgar's larger suppliers.

### Large Tier 1 Suppliers

Tier 1 Suppliers were analysed for potential modern slavery risk against four key risk indices:

- **Geography** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI.
- **Industry** – Specific industry sectors deemed as high risk in international and national guidelines.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low-skilled, vulnerable or migrant labour is used, or where the work is deemed as '4D' work (dirty, dull, degrading or dangerous).



## Large Tier 1 Suppliers (cont.)

An updated analysis of our largest suppliers accounting for over 80% of our annual spend, resulted in the following findings:

- Two spend categories are potentially high risk for modern slavery (C&M and plant and equipment).
- Although Construction and Maintenance ("C&M") works makes up over 50% of annual spend, these are skilled labourers.
- While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of our suppliers' headquarters.
- Collgar is aware of the modern slavery risks associated with the manufacturing of certain renewable commodities and remains vigilant about this aspect of its supply chain.

Overall, our Tier 1 Supplier risk analysis suggests that while there is potential for modern slavery risks in our direct supply chain, the risk is low. However, Collgar is committed to conducting further due diligence to understand our commodity supply chain and to assure ourselves that hired contractors and labourers are not at-risk or vulnerable workers.

## Labour Hire, Consultants and Professional Advisors

Our operating model makes use of third-party service providers to undertake a number of regular, ongoing, and ad hoc work, both on site and in the Perth office. This type of indirect labour poses a more difficult risk assessment as there is often a lack of transparency into the people providing services.

Collgar has five key third-party service providers engaged on a long-term basis to provide support for management services, bookkeeping, payroll, IT management, and operations and maintenance of the wind farm. During 2021-2022, Collgar also engaged a labour hire provider to assist with a one-off upgrade project on site.

For most of these providers Collgar has less visibility and control over how workers are engaged to perform these services and there may be a tendency to subcontract or make use of independent contractor models. We also recognise that with the competitive market and tight industry margins, workers in these categories are more exposed to exploitation or unfair working environments.

Collgar has identified that the workers are either professional in nature (e.g., accounting, ICT experts, engineers) or are highly skilled technicians (e.g., elevated work platform operators). This factor, along with all contractors being located in Western Australia, has informed Collgar's assessment of the risk as low.

# Labour Hire, Consultants and Professional Advisors

Since all of Collgar's labour hire suppliers employ staff in Australia, the risk of modern slavery has been assessed as being low. Despite being a low risk, Collgar undertakes to ensure that working arrangements align with Collgar's values, particularly concerning forced labour or unfair working conditions. Examples include:

- inclusion of modern slavery clauses in major project documents,
- contract clauses limiting the use of subcontractors unless agreed otherwise,
- due diligence on new vendors (including background checks),
- all new vendors must now indicate whether they have modern slavery policies or processes, which will support and inform Collgar's roadmap activities for supply chain due diligence beyond Tier 1.

## The Restructure

Throughout the transition, Collgar recognised the importance of upholding strong modern slavery mitigation practices in our supply chain. In collaboration with our supplier, we diligently assessed the modern slavery risks and implemented measures to safeguard against such risks. Some of the key considerations of the Restructure in relation to modern slavery risks included:

**Supplier Due Diligence:**

Ensuring CRPL had robust modern slavery policies and practices in place.

**Supply Chain Mapping:**

Mapping out CRPL's supply chain to identify any potential high-risk areas where modern slavery could occur.

**Supplier Engagement:**

Engaging with our suppliers to communicate our expectations regarding modern slavery prevention and seeking their commitment to comply.

**Training and Awareness:**

Providing training and awareness programs for CRPL employees to ensure they recognise and address modern slavery risks, ensuring everyone understands their role in preventing exploitation.

**Reporting and Remediation:**

Establishing mechanisms for reporting suspected cases of modern slavery and implementing appropriate remedial actions when necessary.

By considering these factors and working closely with our supplier, we made significant strides in ensuring good modern slavery practices are in place with this Tier 1 supplier.

In addition to the above, Collgar relies on professional services firms such as lawyers and accountants. These vendors have been reviewed in line with the key risk indices and we consider them as low risk for potential modern slavery practices.



## COVID

Collgar has assessed the impact of COVID-19 on our extended supply chain. In 2021, Collgar undertook extensive analysis of our major equipment and components necessary to continue business activities, resulting in a Failure Modes and Effects Analysis and updates to our Business Impact Assessments. This information and the procedures development from the assessment continues to assist Collgar in planning and preparing for COVID-19 related delays and supply chain disruptions to prevent undue pressure on suppliers.

Collgar has continued to work with suppliers to maintain relationships and increase communication levels, to ensure no material changes occur to the delivery of services and equipment.

## Micro Businesses and Sole Traders

Although these suppliers are a very small portion of our supply chain, Collgar still invests in ensuring our operations do not enable modern slavery practices. In addition to early engagement with smaller vendors regarding their own modern slavery policies or risk management processes, Collgar now participates in the Payment Times Reporting Scheme. The purpose of the scheme is to help ensure that small businesses receive timely payments for invoices issued to large enterprises, which includes Collgar. We believe prompt payment of supplier invoices, particularly in relation to small businesses, reduces the likelihood of the risk of modern slavery practices.



# Roadmap and Action Plan



## Activities Undertaken in 2022

Most of the progress in 2022 resulted from ad hoc initiatives identified as timely and material to Collgar's two major projects for the year;

- The total restructure of the Company and introduction of a new key supplier, Collgar Renewables; and
- Negotiation of the service and availability agreement with our Tier 1 O&M provider.

In focusing on these key deliverables during 2022 our approach included consideration of modern slavery governance, due diligence, risk and compliance, procurement and supply chain systems and processes, supplier engagement and monitoring, and broad awareness, training and communications.

# Activities Undertaken in 2022 (cont.)

During the reporting period the following actions were completed:

- Published Collgar's Modern Slavery Policy on website
- Worked closely with CRPL following the restructure to ensure safe and fair labour hire practices, which included:
  - Legal advice to ensure employment contracts aligned with Australian labour legislation;
  - Consultation from Collgar employees about the changes from the Restructure, including opportunities to raise and escalate concerns;
  - Review of applicable award coverage for all transferring employees;
  - Appointment of a Workplace Health and Safety subject matter expert to provide guidance and advice on ensuring a safe workplace in accordance with legislation;
  - A Transfer Agreement ensuring recognition of employee benefits and entitlements from Collgar to the employing entity;
  - Introduction of Pulse Surveys to assess workplace culture relating to issues such as flexibility and work-life balance;
  - Development of a suite of policies and procedures aligned to Collgar values and legislative obligations;
  - Enhanced training delivered around sexual harassment, equal employment opportunities, health and safety, diversity and inclusion, modern slavery, and privacy obligations.
- Incorporated modern slavery assessment criteria into procurement practices and third-party risk assessments.
- Collaborated with our largest supplier of goods and services to introduce robust modern slavery clauses into our service agreement.
- Integrated modern slavery risk management into company strategic objectives.
- Completed a social value impact assessment to better understand social and economic impact of Collgar's operations, particularly in the Central Wheatbelt of Western Australia.
- Continued training and awareness for new employees (and for contractors post Restructure).



# Our Plans Beyond 2022

We recognise that managing modern slavery risks requires ongoing commitment and we aim for continual improvement. Major projects throughout 2022 gave rise to new supply chain considerations, requiring a shift in focus from the agreed roadmap, yet Collgar remains committed to completing these actions.

For 2023, Collgar intends to refocus attention and efforts on the roadmap and action plan, with specific targets and incentives agreed for individuals with ability to lead and drive change.



While we intend to engage with all providers to understand modern slavery risks within their businesses, we have identified the following focus areas for 2023;

- We will reengage with our supply chain with the expectation of better response rates and improved responses, which will better inform our own due diligence and next steps.
- Implement the Sustainable Procurement Framework and monitor the appropriateness of our procurement practices.
- Sustainability best practices in the operation of our wind farm, including decision frameworks for how we choose vendors and suppliers, including seeking increased visibility around the manufacture of specialist wind farm equipment to understand where equipment is sourced, manufactured and assembled.
- Review and update of the action plan and roadmap to strive for continuous improvement.
- Continue to review and report on modern slavery risk management initiatives.

# Due Diligence

Addressing Modern Slavery risks is a complex and challenging process. Collgar's response will continue to evolve over time as we strengthen and refine our approach in future reporting cycles. We will also monitor the regulatory landscape to ensure we maintain our action plan in line with the changes. We recognise the need to undertake human rights due diligence to identify, prevent, mitigate, and account for how we address actual and potential adverse human rights impacts in our operations and supply chains, including Modern Slavery.

In 2022, Collgar undertook a social impact value assessment of Collgar's operations, focusing on the rural community in which our wind farm operates. The results are being applied to strategic decision making for growth and around our charitable giving opportunities. Collgar has also explored the results of this assessment to understand social factors and insights into potential modern slavery practices.



Collgar's comprehensive set of ESG targets, developed from a materiality review of our operations and supply chains, provides ongoing encouragement to undertake due diligence, and monitor, track and report against our performance.

# Effectiveness Reviews

Our effectiveness review program increases transparency of modern slavery issues, supporting awareness and recognition of these risks. The reviews provide us with the ability to improve overall workplace practices and better assess the effectiveness of our activities.

## Annual Review

On an annual basis Collgar's Board reviews the Modern Slavery Statement and provides recommendations and strategic direction for Collgar to consider as part of its ongoing commitment to address these risks.

We treat our risk register as a dynamic, living document. While it undergoes a formal review on an annual basis, the register is reviewed more frequently to align with our risk appetite and to continuously monitor risk treatment plans and effectiveness of controls. As and when modern slavery risks are identified and assessed these will form part of the review process.

## Quarterly Review

Members of CRPL's leadership team and employees charged with ownership of risks associated with managing our supply chain, procurement, and contract management practices review these risks on a quarterly basis. The review includes assessment of the effectiveness of any planned modern slavery mitigation plans as well as identification of emerging risks or other corrective action plans.

In addition, the Audit and Risk Committee is updated on the progress of risk treatment plans in relation to Collgar's modern slavery action plan and initiatives.



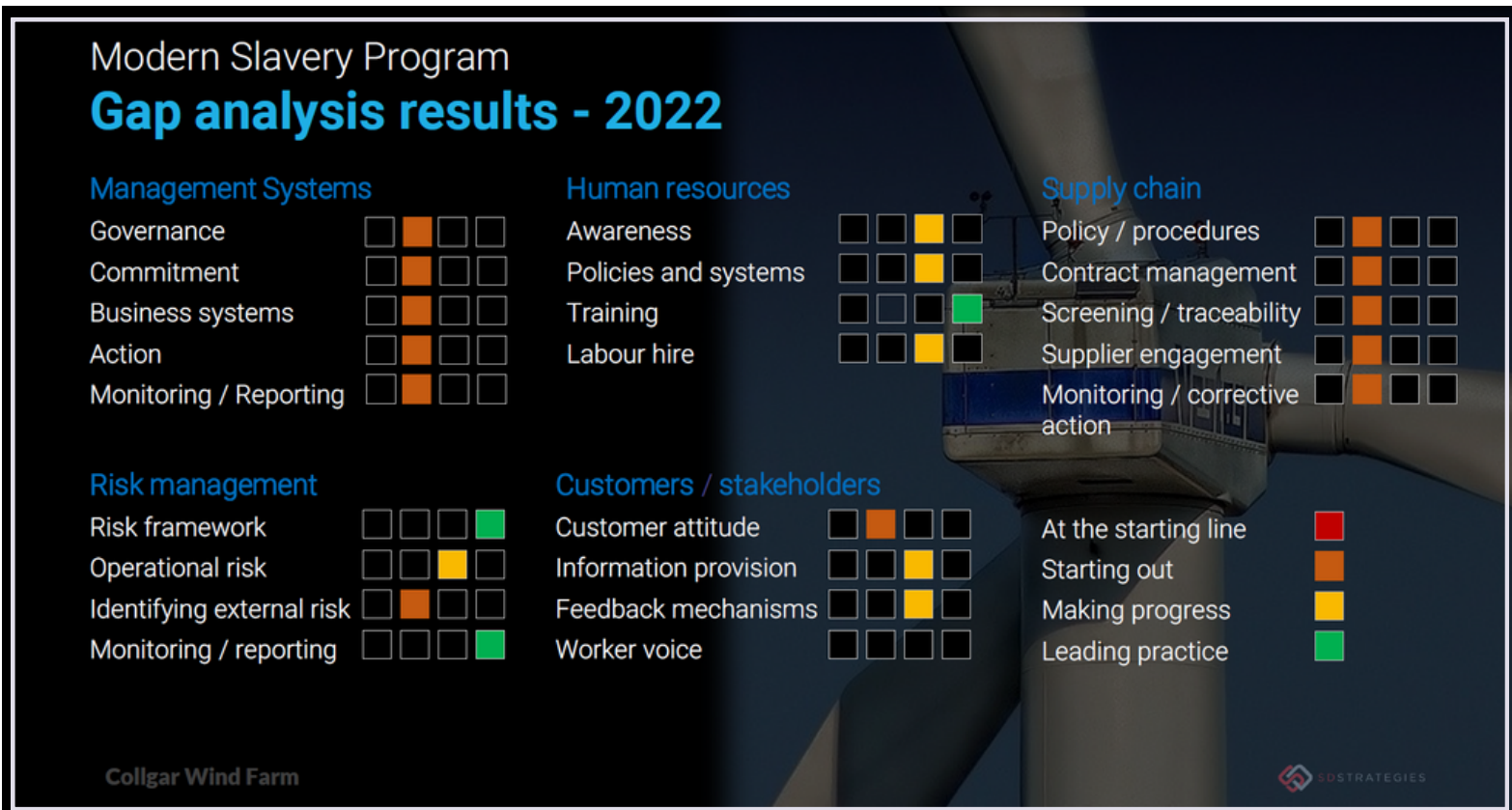
# Modern Slavery Benchmarking

On an annual basis, Collgar participates in an independently facilitated benchmark assessment developed by SD Strategies Pty Ltd called **Bridge the Gap: Helping you better manage modern slavery risks in your business.**

The benchmarking supports identification of the areas we have seen improvement in our practices, but also highlights the areas where we have lost focus or failed to progress as intended. The benchmark covers five key categories:

- Management systems
- Human resources and recruitment
- Procurement and supply chain
- Risk management
- Customers and stakeholders

The following demonstrates the results of the 2022 benchmark assessment.



\*Worker voice has been assessed as a very low risk for Collgar and further actions are not required at this time. We will continue to monitor our operations for red flags necessitating this type of communication.

# Collaboration

As a company with no direct workforce from October 2022, we consider the risk of modern slavery to be low within our direct business operations. However, we recognise that our contractors and suppliers will benefit from increased education around modern slavery, particularly in relation to supply chain and procurement practices. We also recognise that the risks of modern slavery increase deeper in our supply chain and through other third-party relationships.

Importantly, our Board and CRPL have committed resources to identify and address modern slavery risks in our operations and supply chain. Our modern slavery roadmap and action plan, which was developed collaboratively with key stakeholders, has established a pathway for continuous growth and improvement.

We also recognise that the operating context of our various suppliers will influence their level of maturity and awareness in the modern slavery setting. Some of our suppliers are based overseas and have yet to progress the kind of due diligence required by Australia's Modern Slavery Act.

Nevertheless, we adopt a collaborative approach to garner further information from our suppliers. We also review Tier 1 suppliers' policies on human rights and any outcomes from publicly available information, including one supplier's human rights impact assessment. As part of our standard business practice, Collgar now appoints key suppliers on terms which offer a mechanism for enabling assessment and validation of that supplier's modern slavery risk exposure and management practices.

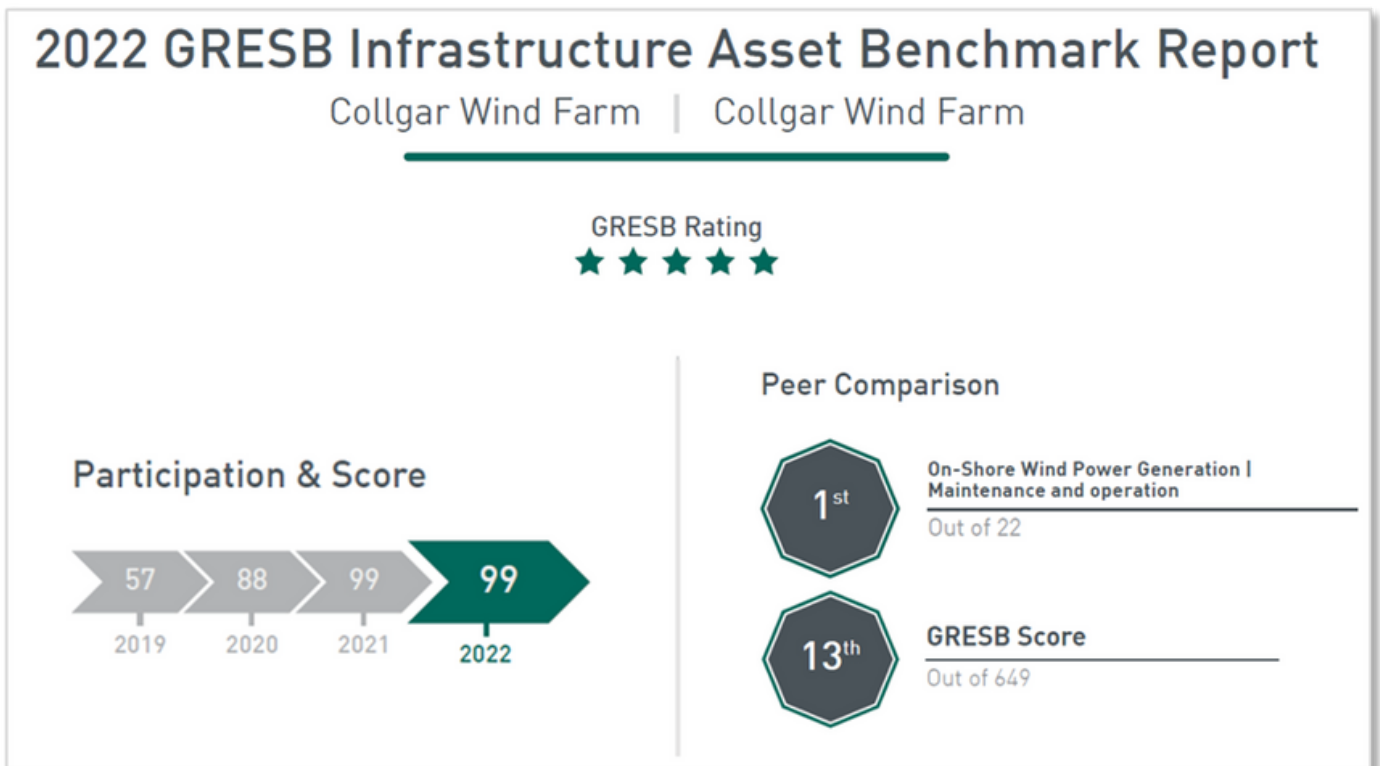
We have learned from this experience and understand that Collgar has an opportunity to engage and share best practices, and where possible we will continue to collaborate in an effort to mitigate the risk of modern slavery throughout our supply chain.

# Consultation

During the reporting period, Collgar actively engaged and consulted with all entities in the Collgar Group in the development of this Statement. Each entity is aware of the Act's reporting requirements and Collgar's plan for addressing these requirements. The Collgar Group, including each entity's respective boards, have been consulted and provided with relevant materials and updates, and given the opportunity to participate in the process.

# Other Information

Collgar's work in defining and making public commitments to social issues, including our work in developing our modern slavery action plan, has contributed to Collgar being recognised as Sector Leader in Renewable Power in the GRESB sustainability benchmarking assessment.





Head Office: 2/1008 Hay Street, Perth WA 6000  
Wind Farm: 945 Bulls Head Road, Norpa WA 6415  
ABN: 27 130 586 088 | Ph: 08 6465 9100