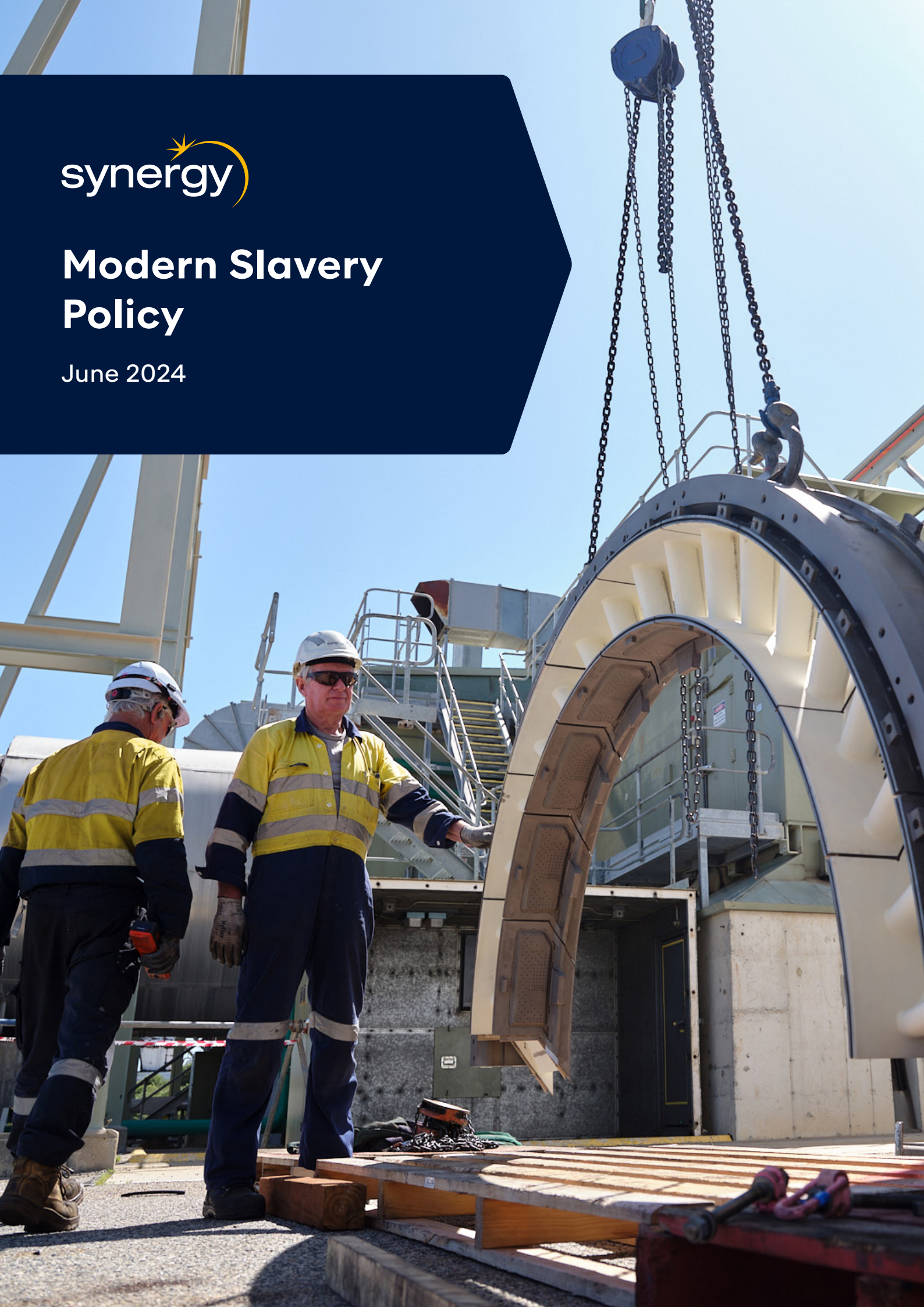




# Modern Slavery Policy

June 2024



**Synergy's corporate strategy, underpinned by the social value strategic pillar, requires both decarbonisation and an ongoing commitment to addressing modern slavery risks in its operations and supply chains.**

This policy articulates Synergy's commitment to change behaviour within its supply chains to reduce the incidence of modern slavery; it also outlines expectations regarding the management of modern slavery risks.

**Policy scope:**

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- This policy applies to all Directors of the Board, management, employees, and contractors engaged and undertaking work on behalf of Synergy, including all related subsidiaries (South West Solar Development Holdings Pty Ltd (SWSDH), and SWSDH's subsidiary Synergy Renewable Energy Developments Pty Ltd (SynergyRED)), wherever they may be located (collectively referred to as employees in this policy).
- This policy applies to Synergy's operations, activities, and all its dealings with suppliers (e.g., business partners and vendors) whether they be with private organisations, individuals, or any representatives of such persons. Compliance with this policy is the responsibility of all Synergy employees (irrespective of an individual's particular role or responsibilities).
- Synergy expects all contracted suppliers to uphold the same standards and commits to working in partnership with our suppliers to implement this Policy.

**We are committed to:**

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- ensuring goods and services purchased through our supply and value chains are ethical and either reduce or, where possible, eradicate human suffering in our supply chain;
- demonstrating leadership to change the behaviour in our supply chain and influence policy and industry;
- generating appropriate sub-tier visibility and maintaining highly reliable data sources;
- driving organisational alignment around modern slavery, including through engagement with key internal and external stakeholders;
- providing tools and resources that enable and sustain an effective organisational culture, capability and delivery model;
- supporting and encouraging employees and suppliers to raise genuine grievances about modern slavery matters, whether identified by, or affecting them, in the workplace;
- providing clear communication and guidance to employees on how to act upon recognition of an actual, or potential, modern slavery issue; and
- complying with relevant regulatory requirements.

## **Management of modern slavery risks at Synergy must:**

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- provide assurance to the Board of Directors (Board) and Executive Leadership Team (ELT) that all known modern slavery risks are being effectively identified, assessed and managed;
- enable informed risk-based decision-making;
- improve stakeholder confidence in Synergy's ability to deliver its strategy;
- continue to enable and advance Synergy's approach to addressing modern slavery risks; and
- support compliance with relevant regulatory requirements.

## **It is expected that:**

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- the Board sets risk tolerability and appetite in relation to modern slavery;
- the Board has overall accountability for ensuring Synergy, and all related subsidiaries, comply with its legal and ethical obligations;
- the ELT has overall responsibility for ensuring Synergy, and all related subsidiaries, comply with its legal and ethical obligations;
- management at all levels are responsible for ensuring that employees reporting to them are made aware of, understand, and comply with this policy and related documents;
- suppliers are informed of their obligations under the Supplier Code of Conduct, and supplier non-compliance is reported;
- material risks are adequately communicated and required consultation is undertaken;
- employees procuring goods and services, including those in decision-making roles, apply this policy and related documents prior to executing any new purchasing engagement or extending any existing purchasing arrangement;
- accountability and authority for managing modern slavery risks are assigned.

**David Fyfe CEO**

June 2024