



RATCH-Australia Corporation

Modern Slavery Statement 2023

This is the modern slavery statement (**Statement**) of RATCH-Australia Corporation Pty Ltd (**RATCH-Australia**), as informed by the *Modern Slavery Act 2018 (Cth) (Act)*. It covers the company's financial year ending 31 December 2023.

Modern slavery is an important and complex global challenge. RATCH-Australia seeks to ensure modern slavery and human trafficking are not taking place within its business and supply chain.

At RATCH-Australia, we recognise that modern slavery can occur in any industry - including in the energy sector - and can take many forms. We are committed to conducting business in a responsible way and protecting human rights across all areas where our business operates.

The purpose of this Statement is to outline the framework and processes RATCH-Australia has implemented to minimise the risks of modern slavery in our operational and procurement practices.

This Statement covers the activities of RATCH-Australia and its controlled entities.

Our structure, operations and supply chain

Our structure

RATCH-Australia is an independent power producer with a portfolio of energy generation assets totalling more than 1.6GW in capacity. We have been developing, building and operating projects in Australia for over a decade.

RATCH-Australia is a wholly-owned subsidiary of RATCH Group Public Company Limited (**RATCH-Group**), which is listed on the Stock Exchange of Thailand. RATCH-Australia's head office is in Sydney. In December 2022, the RATCH-Group acquired Nexif Energy. Its Australian entities were integrated into RATCH-Australia in December 2023. The

integration included the addition of two additional assets into the RATCH-Australia asset portfolio.

The RATCH-Australia fleet comprises both gas-fired and renewable (solar and wind) energy generation, with assets located across the country. RATCH-Australia's interests are managed via 42 subsidiary companies. Each subsidiary's consolidated revenue is below the reporting threshold under the Act.

Our operations

As at 31 December 2023, RATCH-Australia had 24 employees based across Australia, including on-site at our operating assets.

Key activities during the period included;

- development of new renewable energy generation and storage projects;
- operation and maintenance of energy generating assets;
- management of contracts to supply electricity; and
- refinancing some of RATCH-Australia's thermal energy assets into a single debt portfolio.

Our supply chain

RATCH-Australia's direct suppliers are predominantly based in Australia. However, a number of suppliers' source and manufacture materials overseas, including from countries classified as a higher risk for the prevalence of modern slavery practices than Australia.

RATCH-Australia's supply chain comprises:

- **Asset management**
Locally based engineers and technicians performing on-site maintenance work under long-term contracts. Contractors may also engage local sub-contractors where required, supplemented with specialist technical expertise. These are typically sourced from within Australia but specialise expertise, equipment and parts may be sourced from overseas.
- **Construction**
Australia-based contractors appointed to manage construction of new projects. Contractors engage Australian sub-contractors for specific tasks such as civil engineering, electrical works and haulage. They may also engage offshore-based specialist contractors and staff. Equipment, such as wind turbines, is typically

manufactured overseas and shipped to Australia.

- **Project development**
Australian-based consultants engaged to provide specialist advice to inform development applications and project feasibility studies.
- **Support services / corporate services**
RATCH-Australia engages some external corporate consultants such as financial and legal consultants to support its activities both at a corporate level and at a project level throughout the life cycle of each project and asset.

Identifying modern slavery risks in our operations and supply chain

RATCH-Australia conducts its business by prioritising health, safety, the environment and the community, and complies with all labour, employment and whistleblower laws of Australia, across all the States in which we operate.

During this reporting period, RATCH-Australia's modern slavery objective was to continue to deepen our understanding and identification of our modern slavery risks. While we comply with all internal policies and procedures, we acknowledge that modern slavery has the potential to exist in our operations and supply chain through a variety of circumstances.

RATCH-Australia conducted a risk assessment of its operations to identify and consider the risks that could cause, contribute to, or be

directly linked to modern slavery practices.

In undertaking this review process, RATCH-Australia's focus was on our largest suppliers by spend. We acknowledge that modern slavery risks are present in all suppliers regardless of spend size. RATCH-Australia will continue to work with suppliers to further understand vulnerabilities and ensure modern slavery risks across our supply chain are minimised. This approach enables us to establish where modern slavery risks exist that can develop in future years to improve business operations.

Potential supply chain risks

RATCH-Australia's operations span the energy and construction sectors. The company has identified the following areas that may pose risks of modern slavery:

- labour rights, including forced or compulsory labour, wage rights and work hours;
- occupational health and safety; and
- labour practices used by manufacturers and their raw material suppliers, including forced or compulsory labour, wage and benefit rights, work hours and child labour (including unskilled, temporary or seasonal labour).

Our workforce

RATCH-Australia considers the risk of modern slavery in its directly employed workforce to be very low, due to the highly regulated nature of the labour market in Australia. Direct employees work in environments with established industrial processes and procedures in place. Their salaries and workplace conditions are consistent with Australian law and reflective of market practices. Additionally, workplace health and safety is a very important priority at all RATCH-Australia sites.

Assessing and addressing the risk of modern slavery practices

Assessing risks

In assessing the risks of modern slavery, various teams within RATCH-Australia worked collaboratively, to ensure that all modern slavery risks are identified and considered. The RATCH-Australia compliance and asset team, actively consulted with suppliers to not only assess but to understand their operations. RATCH-Australia's supply chain can be difficult to examine as it includes complex, multi-tiered components that might span various countries. This complexity can limit the ability to have clear oversight of conditions which in turn can create risks for modern slavery issues.

RATCH-Australia's commitment to understanding any complexities and better understanding its working relationships with key stakeholders is demonstrated by the recent completion of modern slavery questionnaires and review of modern slavery statements supplied by key suppliers. This process not only allowed RATCH-Australia to better understand suppliers' operations but to assure the company that the organisations undertaking business for RATCH-Australia are committed to mitigating any modern slavery risks and held accountable for any breaches of this Statement.

Responsibility for assessing modern slavery risks was assigned to an identified individual to enable escalation of concerns and awareness of requirements at the Board level, as well as providing a point of contact for all staff.

Our suite of risk-related policies and governance control measures was reviewed to ensure that modern slavery risk has been adequately

considered and appropriately implemented within the business. Our control measures are reviewed annually and updated accordingly when applicable not only to better ensure a robust organisation but to also mitigate further risks. It will be an ongoing process for the year ahead to continually review policies in place and ensure compliance.

Addressing risks

RATCH-Australia has addressed the identified modern slavery risks in the following ways:

- adapting to market changes and ensuring our policies are aligned with industry and regulatory standards;
- reviewing and updating RATCH-Australia's Supplier Code of Conduct (**SCC**) to ensure it is aligned with relevant industry and regulatory standards;
- reviewing and updating RATCH-Australia's Purchase Order Terms and Conditions, which expressly deal with modern slavery; and continuing to process RATCH-Australia's standard procurement contracts by including contractual clauses addressing modern slavery;

We have set out below in more detail what these changes entail.

Reviewing policies

RATCH-Australia policies which relate to Modern Slavery are periodically reviewed and considered in light of the development of this Statement. The *SCC* was updated at the time of the 2023 Statement and still aligns to industry and regulatory standards. The Purchase/Service Order General Terms and Conditions will be updated for the 2024 reporting period to ensure procurement processes are continually up to date with relative legislation changes which is inclusive of compliance on modern slavery obligations.

Supplier Code of Conduct

In 2020, RATCH-Australia developed, published and issued its first *SCC*. In 2023 we further revised the *SCC* which sets out:

- RATCH-Australia's commitment to act ethically and with integrity in all its business relationships;
- RATCH-Australia's expectations of its suppliers with regards to modern slavery and other socially responsible procurement practices; and
- the steps that will be taken by RATCH-Australia against suppliers who do not follow these standards.

As a business, RATCH-Australia is continually reviewing its procurement policies. RATCH-Australia will continue to monitor its performance against this Statement. Our people, suppliers, partners and those who represent us are all responsible for making sure we carry out our commitments.

Implemented training for employees

RATCH-Australia continues to consider how to better implement ways to create a more collaborative environment for employees to provide feedback relevant to their business line on potential improvements to modern slavery compliance. Along with the feedback (between departments) given to RATCH-Australia, RATCH-Australia aims to continually improve and develop various way to implement modern slavery education to employees to ensure staff understand modern slavery and the necessary compliance.

Assessing the effectiveness of our actions

RATCH-Australia believes that ongoing assessment of the effectiveness of its processes is critical to ensuring accurate, up-to-date and timely information is

available and considered by the organisation in relation to modern slavery risks and compliance.

To ensure its actions continue to minimise the risk of modern slavery in its supply chain, RATCH-Australia will continue to require that suppliers complete RATCH-Australia's modern slavery questionnaires. This will be done using the processes that RATCH-Australia developed in 2020 and updated in 2023.

Closely scrutinise suppliers' responses to modern slavery questionnaires

Responses to the initial surveys demonstrated that key suppliers have robust policies in place to prevent modern slavery practices entering their and RATCH-Australia's supply chains. These include detailed supplier review mechanisms, thorough screening procedures and comprehensive on-boarding programs. This approach also enables RATCH-Australia to challenge suppliers in cases where procedures are not in place or fit for purpose.

Consideration will be given in the coming year to expanding the reach of this tool to ensure we better understand potential vulnerabilities in RATCH-Australia's evolving supply chain.

Review policies and procedures

RATCH-Australia will continue to review and refine its policies and procedures to ensure that measures to monitor and minimise the risk of modern slavery are embedded in our business practices. This includes ensuring that existing reporting avenues are sufficiently well adapted to allow the reporting of modern slavery and that the escalation principles enshrined in RATCH-

Australia's Whistleblower Policy are effective in addressing and potentially remediating modern slavery incidents.

Engage with industry forums promoting best practice in this field

In FY23, RATCH-Australia participated in the Clean Energy Council's Risks of Modern Slavery Working Group. We will continue to participate in this and other relevant industry forums as relevant to our business needs.

Train and educate

Regular training to RATCH-Australia employees on modern slavery risks will be provided so that compliance obligations are communicated to and understood by all members of the business.

Performance

To date there have been no known breaches to this Statement at any of RATCH-Australia's operations or throughout our supply chain.

Consultation

Yandin Wind Farm is a joint investment between RATCH-Australia and Alinta Energy, managed by Alinta Energy. Consultation between relevant personnel of the joint investment venture participants has been conducted, including a review of the procedures implemented by Alinta Energy, the managing party, to minimise the modern slavery risks associated with this project. RATCH-Australia is satisfied that the manager's processes are robust.

Governance

This Statement was approved by the Board of RATCH-Australia Corporation Pty Ltd for the year ending 31 December 2023.



Sahachthorn Putthong
Director and Chief Executive Officer