



MODERN SLAVERY POLICY

ACN 152 098 854

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1. PURPOSE

In this Modern Slavery Policy (**Policy**), references to "**Genex**" means Genex Power Limited (ACN 152 098 854) and all its wholly owned subsidiaries and any references to "we" or "us" is also a reference to such companies.

Genex is an ASX-listed company focused on developing a portfolio of renewable energy generation and storage projects across Australia (**Genex Renewable Energy Projects**). This Policy applies to all of Genex's procurement activities (of goods and equipment in general) as such are implemented in the development and construction of Genex Renewable Energy Projects.

Modern slavery involves serious exploitation where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery is a significant problem, which requires commitment from all stakeholders to address.

The purpose of this Policy is to, in the context of the development and construction of a Genex Renewable Energy Project:

- provide guidance about best practices to minimise the risk of modern slavery in Genex's operations and supply chain;
- mandate compliance with modern slavery legislation and relevant United Nations (UN) Guiding Principles on Business & Human Rights;
- recognise the risk of modern slavery in Genex's operations and supply chain and the detrimental effects of modern slavery on others; and
- improve Genex's practices to address the risk of modern slavery in its operations and supply chain.

2. SCOPE

Under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) the scope includes eight types of serious exploitation:

- trafficking of persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;

- the worst forms of child labour; and
- deceptive recruiting for labour or services.

The Policy applies to all persons and entities working for Genex or on our behalf in any capacity, in the context of the development and construction of a Genex Renewable Energy Project, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and business partners (collectively, **Genex Members**).

While the Policy applies to all Genex Members, particular focus applies to Genex’s business units and staff responsible for on-boarding, monitoring and consulting with our suppliers, contractors and business partners involved in a Genex Renewable Energy Project, including:

- Vendor and Partner Relationships;
- Legal and Compliance.

3. RESPONSIBILITIES

PERSON RESPONSIBLE	RESPONSIBILITIES
Board of Directors	<ul style="list-style-type: none"> • The Board of Directors of Genex (or an applicable Board Committee) is responsible for review and approval of the Genex annual modern slavery statement.
Chief Executive Officer	<ul style="list-style-type: none"> • The overall responsibility for ensuring the Policy complies with Genex’s legal and ethical obligations, and that all those under its control comply with it. • Approving Genex’s annual modern slavery statement and ensuring that it complies with Genex’s disclosure obligations under Australian modern slavery legislation.
General Counsel or Compliance Manager	<ul style="list-style-type: none"> • Overall responsibility for ensuring the Policy complies with our legal obligations and dealing with any queries about it. • Ensuring, together with the HSEQ Manager, that Genex’s annual modern slavery statement complies with our disclosure obligations under Australian modern slavery legislation.
HSEQ Manager	<ul style="list-style-type: none"> • Overall responsibility for ensuring that the Policy is complied with by all those under our control who are required to comply with the Policy. • Ensuring, together with the General Counsel or Compliance Manager, that Genex’s annual modern slavery statement complies with our disclosure obligations under Australian modern slavery legislation. • Implementing the Policy (i.e. ensuring communication to all stakeholders, human rights due diligence checks are carried out, and modern slavery prohibitions are included in relevant contracts etc.), and monitoring its use and effectiveness and dealing with any queries about it.
Genex Senior Management	<ul style="list-style-type: none"> • Responsible for ensuring those reporting to them understand and comply with the Policy. • Responsible for ensuring those reporting to them is given adequate and regular training on the issue of modern slavery in supply chains including any areas of our business and supply chains which are identified as at risk of modern slavery practices.
All Genex Staff	<ul style="list-style-type: none"> • Must ensure that those reporting to them read, understand and comply with the Policy as part of the corporate induction process.

- Implementing the Policy (i.e. ensuring communication to all stakeholders, human rights due diligence checks are carried out, and modern slavery prohibitions are included in relevant contracts etc.), and monitoring its use and effectiveness and dealing with any queries about it.
- Are required to avoid any activity relating to Genex's business operations or supply chain that might lead to, or suggest, a breach of the Policy. If a staff member does come across any instances of potential modern slavery, they must escalate as soon as possible.
- Must notify their immediate manager, Chief Executive Officer or via the Whistleblower Policy process (Genex's Whistleblower Policy is available at genexpower.com.au), as soon as practicable, should they suspect that a conflict with the Policy has occurred, or is likely to occur in the future.
- Are encouraged to speak up regarding concerns about any issue or suspicion of the existence of modern slavery in any part of Genex's business operations or supply chain.

4. POLICY STATEMENT

Slavery is a crime and a violation of fundamental human rights. It takes various forms as outlined in Modern Slavery Act and includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Genex is committed to acting ethically and with integrity in all our business dealings and relationships. Genex will implement effective systems and controls to ensure that, as far as reasonably practicable, modern slavery is not taking place in our own operations or in any of our supply chains. This includes the following requirements:

- Genex commits, as part of the modern slavery system, to conduct human rights due diligence checks as part of contract negotiations.
- Genex is also committed to ensuring there is transparency in our own business and in our approach to confronting modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation.
- Genex requires the same high standards from all our contractors, suppliers and other business partners and stakeholders.
- As part of our contracting processes, Genex includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and Genex requires that our suppliers hold their own suppliers to the same high standards.

The Policy does not form part of any contractual arrangements, whether for service or employment, and Genex may amend, replace, supersede or withdraw it at any time and without notice.

5. REPORTING AND BREACHES

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Genex's business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of the Policy has occurred or that it may occur, you must notify Genex's General Counsel or Chief Executive Officer as soon as possible.

Any employee who breaches the policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Genex may terminate its relationship with other individuals and organisations working on its behalf if they breach the Policy.

6. ESCALATION

Any actual or suspected instances of modern slavery in Genex's business operations or supply chain must be properly documented and notified through the right channels.

- Breaches of the Policy or related documents should be promptly notified to Genex's General Counsel. If any staff member believes appropriate action is not being taken, they may refer to the Whistleblower Policy (Genex's Whistleblower Policy is available at genexpower.com.au) and make use of a range of reporting options available.
- Any supplier assessed as representing an EXTREME or HIGH Risk or being known to engage in Modern Slavery must be reported to the Chief Executive Officer so that remediation action may be initiated.

7. ACKNOWLEDGEMENT AND TRAINING

All Genex Members are required to review the Policy through the Genex induction process. Genex employees at all levels and Genex directors are provided with regular training which includes the issue of modern slavery in supply chains as well as any areas of our business and supply chains which are identified as at risk of modern slavery practices.

8. COMMUNICATION

The Policy shall be communicated with key stakeholders at the discretion of Genex's management and will involve consultation with such stakeholders as and when required to provide for continual improvement of the modern slavery management system. This communication will include information on how to identify modern slavery practices and the parts of our business and supply chains which are subject to a greater risk of modern slavery practices.

Reviewing the Policy will also form part of the induction process for all individuals who work for Genex, whether as an employee or a contractor.

9. REVIEW AND RECORD KEEPING

All computer system documentation and media will be maintained on Genex’s shared drive (One Drive) and will be backed up on Genex’s cloud-based server.

The following records should be kept and maintained to demonstrate compliance with the requirements of the Policy:

- Modern Slavery Statement;
- Actions Module in Donesafe – corrective or preventive actions;
- Policy communications to all suppliers, contractors and business partners; and
- Genex employee induction and training records.

The Policy is to be reviewed annually. It is also subject to independent audits or reviews undertaken from time to time by the Board of Directors of Genex, and internal and/or external auditors.

10. DEFINITIONS

The following definitions are derived from the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities:

TERM	MEANING
Modern Slavery	<ul style="list-style-type: none"> • The Modern Slavery Act includes eight types of serious exploitation as modern slavery: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.
Trafficking of persons	<ul style="list-style-type: none"> • Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	<ul style="list-style-type: none"> • Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Servitude	<ul style="list-style-type: none"> • Describes situations where the victim’s personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
Forced labour	<ul style="list-style-type: none"> • Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Forced marriage	<ul style="list-style-type: none"> • Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony. <p>*Reports on forced marriage are only required in situations where Genex’s activities or the activities of entities in the Group’s supply chain may cause or contribute to forced marriage.</p>
Debt bondage	<ul style="list-style-type: none"> • Describes situations where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
The worst forms of child labour	<ul style="list-style-type: none"> • Describes situations where children are: <ul style="list-style-type: none"> – exploited through slavery or similar practices, including for sexual exploitation;

- engaged in hazardous work which may harm their health, safety or morals; or
- used to produce or traffic drugs.

Deceptive recruiting for labour or services

- Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

11. RELEVANT LEGISLATION

The following legislation applies to the Policy. Please always ensure that any legislative changes are considered when using the Policy:

- *Modern Slavery Act 2018* (Cth)
- *Privacy Act 1988* (Cth)

Approved by the Board on 12 April 2023.



 Ralph Craven
 Chair of the Board of Directors