



RESPONSIBLE SOURCING AND MODERN SLAVERY POLICY

Aligned with the United Nations 17 Sustainable Development Goals¹

BACKGROUND

Most countries have laws prohibiting bribery and corruption. However, many countries (including Australia) also have laws that prohibit bribery and corruption, no matter the jurisdiction in which it occurs. A breach of these laws can be a serious offence, which may result in fines in respect of the relevant company, or the imprisonment of its employees. The appearance of a breach of these laws can also have a serious reputational impact on the company in question.

As a result of the above and as a matter of good corporate practice, the Board of Directors (the **Board**) of Conjugate Energy Limited (the **Company**) has implemented this Anti-bribery and Corruption Policy (this **Policy**) which applies to all members of the Company Group.

Certain types of payments are dealt with under the Policy to ensure openness, transparency, and consistency in approach across the Company Group.

WHO IS COVERED IN THIS POLICY?

This Policy covers all Company Personnel and Associated Persons.

1. POLICY

Conjugate Energy Limited is committed to ensuring that all of its operations are conducted in a responsible, fair and sustainable manner, in line with its core values, its Code of Conduct and Business Ethics.

This Responsible Sourcing and Modern Slavery Policy sets out the Group's commitment to the procuring of goods and services, its responsible sourcing, and its expectations of suppliers in this regard. The Group is committed to developing and maintaining effective working relationships with suppliers that are aligned with the Group's core values, ethical business principles and its commitment to sustainability and corporate responsibility.

The Group additionally expects all supply partners to demonstrate their own commitment to sustainability, and ensure that their business operations and networks are free from modern slavery. The Group aims to work in collaboration with such supply partners to realise positive social and environmental outcomes.

The term 'supplier' or 'supply partner' is intended to capture any supplier, contractor and subcontractor that provides products and / or services to the Group. Alignment with this Policy will be considered by the Group in its procurement decision making processes.

The term 'modern slavery' describes a range of extreme labour rights abuses and exploitative conduct including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment practices and child labour.

2. PRINCIPLES

The over-arching principle of responsible sourcing is to reduce the risk of illegal and human rights violation risks in the Group's supply chain and procurement process.

Ethicality in the supply chain and procurement process relates to the Group taking all reasonable steps to ensure no breach of local or international legislation such as the *Modern Slavery Act 2018* (Cth) (the **Act**) has occurred during the entire life cycle of the product or service purchased.

The Group upholds the following principles, and expects the same of its suppliers:

- (a) Create a safe workplace for all of its employees, contractors and the broader community;
- (b) Respect and promote human rights and commit to eliminating any human rights harm and any form of modern slavery from within its supply chain;
- (c) Uphold strong ethics with business conducted lawfully without bribery, corruption, or any type of fraudulent behaviour;

- (d) Act responsibly to minimise the impacts of its business and its supply chain to the environment and the community;
- (e) Acknowledging and respecting indigenous cultures, particularly the Aboriginal and Torres Strait Islander cultures.

3. OBJECTIVES

The Company's objectives are based on the Universal Declaration of Human Rights and related international instruments. To the extent relevant to its activities and procurement process, the Company is committed to addressing the risk of human rights harm and modern slavery in its supply chain by taking all reasonable steps to ensure:

- (a) no child labour or forced labour is used, and that employment is freely chosen;
- (b) workers have wages and employment agreements that meet minimum legal standards;
- (c) all workers are free to exercise their right to form and/or join trade unions and to bargain collectively, in line with the requirements in the jurisdictions and industries in which the business operates;
- (d) workers experience fair and equal treatment and access to opportunity and enjoy a work environment that is free of discrimination, harassment, intimidation or coercion relating directly or indirectly to race, religion, gender, marital status, sexual orientation, pregnancy, age, nationality, and disability;
- (e) all workers' health and safety are protected in the workplace so far as is reasonably practicable; and
- (f) workers have access to fair procedures and remedies.

Additionally, the Company is committed to environmental responsibility and minimising the impact of its business on the environment and the communities in which it operates. Suppliers are similarly expected to work toward improving their own environmental performance and minimising any negative environmental impacts associated with their businesses.

4. SUPPLIER RESPONSIBILITIES

Suppliers are expected to have read, understood and act consistently with this Policy, which will be made available to parties involved in potentially relevant procurement processes and supply-related contracts or agreements. The Group's suppliers are expected to communicate the aims and expectations of this Responsible Sourcing Policy to their own supply chain when supplying products or services connected to the Group.

The Company expects its suppliers to:

- (a) collaborate with the Company to manage any modern slavery risks within their supply chains, including implementing measures to assess, minimise and address modern slavery risks and encourage greater sourcing transparency;
- (b) take all reasonable steps to source labour, products, services, and materials from sources free of modern slavery and that reduce environmental impacts;
- (c) establish a mechanism accessible to all workers for them to report and resolve concerns and grievances, anonymously and/or without fear of retribution; and
- (d) promote the use of diverse supply partners, including Aboriginal and/or Torres Strait Islander businesses, social enterprises, and local businesses wherever possible.

Suppliers are obligated to comply with all laws and regulations relating to environmental compliance, human rights, labour practices, health and safety, business integrity, anti-corruption, and bribery, in the jurisdictions that they operations.

5. APPENDIX



Version	Last periodic review	Last update	Approver
1.0	August 2022	August 2022	Board

