

MODERN SLAVERY STATEMENT



This statement sets out actions taken by the Alkira Fuel Management Pty Ltd ABN 68 638 227 059 and Alkira Fuel Program Pty Ltd ABN 84 638 339 796 and its related bodies corporate to address modern slavery and human trafficking risk in our business and supply chain for the year ending June 2021. It has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)*.

Alkira Fuel covers the whole group and includes *Alkira Fuel Program Pty Ltd* and *Alkira Fuel Management Pty Ltd*.

Alkira Fuel requires group entities to follow corporate policies, including in relation to assessment and mitigation of modern slavery risk. Where appropriate, Alkira Fuel has also consulted with entities in which it has non-controlling interest to assess their approach in management of modern slavery risks.

Modern Slavery Statement 2021

In accordance with the Modern Slavery Act 2018, this statement outlines the steps that Alkira Fuel has taken, and is continuing to take, to assess and reduce risk of modern slavery within our business and our supply chain, and our plans for review and improvement.

Introduction

Modern slavery is a crime and isolation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Alkira Fuel recognises that it has a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices that protect workers from being abused and exploited, both in our own business and our supply chain. Alkira Fuel is committed to limiting the risk of modern

MODERN SLAVERY STATEMENT

slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

Potential risk in our operations and supply chain

Alkira Fuel assessed risks that may possibly cause, contribute or be directly linked to modern slavery practices, in accordance with guidance published by the Australian Government's Department of Home Affairs.

On the basis of this assessment, we believe the risk of modern slavery practices in our operations and supply chains is relatively low.

Areas of higher risk include:

- Sector and industry risk, including electronics, cleaning and textiles.
- Product and services risk, including cleaning and merchandise; and
- Geographic risk, including overseas jurisdictions where our suppliers may operate.

Suppliers exposed to these risks may be relatively more likely to participate in modern slavery practices or to be exposed to modern slavery practices in their downstream supply chains. For example, Alkira Fuel could purchase from an Australian supplier equipment manufactured by an overseas entity with a record of modern slavery practices.

Alkira Fuel have also considered common indicators of modern slavery, and how these identifiers could potentially manifest in the case of an end recipient of goods or services.

Addressing Modern Slavery Risk

Alkira Fuel policies and procedures set expectations for our staff and the responsible conduct of our business. To address the risk of modern slavery in our supply chains, Alkira Fuel has continued to refine policies and procedures, including with respect to employee conduct, staff training and due diligence for major suppliers.

MODERN SLAVERY STATEMENT

Supplier Code of Conduct

Alkira Fuel's supplier Code of Conduct (code) sets out Alkira Fuel's expectations and minimum standards of behaviour required for our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts and health and safety. It also specifically addresses labour, human rights and modern slavery standards.

The code is publicly available on Alkira Fuel's website and is made available to our major suppliers.

In accordance with the code, Alkira Fuel expect suppliers to engage and manage people ethically and to comply with all laws, regulations and standards in respect of modern slavery, including human trafficking, exploitation, forced labour and child labour.

The Code sets out Alkira Fuel's expectation that suppliers will monitor their compliance and notify Alkira Fuel as soon as practicable if they become aware of a reasonable risk of breach. Alkira Fuel also expects suppliers to take reasonable steps to address, remedy and prevent the recurrence of any Breach of the Code.

Alkira Fuel may also periodically review or audit a supplier's compliance with this Code. If Alkira Fuel discovers a case or a significantly increased risk of modern slavery within Alkira Fuel's supply chain (or indirectly through a supplier's own supply chain) we will first seek to work with the supplier to implement corrective action. Material non-compliance or continued non-compliance with the Code may lead Alkira Fuel to disqualify a potential supplier or terminate Alkira Fuel's business relationship with a current supplier.

Supplier Questionnaire

Alkira Fuel is not practically able to observe the entirety of supplier's operations. As part of our supply chain due diligence, Alkira Fuel have developed a Supplier Questionnaire (Questionnaire) to gather information about suppliers' operations, supply chains and modern slavery standards. Alkira Fuel may take additional steps based on a supplier's response to the Questionnaire or an assessment of products and services provided by a supplier.

Alkira fuel obtained satisfactory responses to this Questionnaire from major suppliers and other suppliers we consider operate in high-risk sectors.

Alkira Fuel will ask suppliers to refresh their responses to the Questionnaire at appropriate intervals and will continue to give the Questionnaire to new major suppliers (and others Alkira Fuel consider operating in high-risk areas). Alkira Fuel monitors responses to the Questionnaires to identify trends and emerging risk that may warrant further investigation or action.

Contract Terms

Alkira Fuel has developed standard contractual clauses for major suppliers (and others Alkira Fuel consider operating in high-risk areas) requiring them to comply with relevant modern slavery laws and standards. When implementing these terms, Alkira Fuel adopts a collaborative approach with suppliers to promote mutual understanding of modern slavery risk by communicating the importance of these standard clauses in our contracts to the supplier. Alkira fuel aims to incorporate these clauses in the contracts with all applicable suppliers.

MODERN SLAVERY STATEMENT

Training

To help build awareness of modern slavery and assist in identifying potential modern slavery risks, Alkira Fuel provides employees with information about Alkira Fuel's obligations under modern slavery legislations and the processes to assess and address modern slavery risks.

During the last 12 months, Alkira fuel distributed a Modern Slavery Fact Sheet to all employees. The Fact Sheet explained what modern slavery is, the modern slavery risk, and how employees can report any indicators or suspected instances of modern slavery within Alkira Fuel supply chain.

Grievances

Alkira Fuel offers various channels for seeking guidance, reporting concerns and raising grievances. Alkira Fuel employees are encouraged to raise concerns as soon as possible with their manager, a member of the senior leadership team or the Head of Legal and Corporate Affairs. If an employee does not feel comfortable speaking with any of these people, they are encouraged to raise their concern via Alkira Fuels Whistleblowing Policy or via a whistleblowing hotline. These channels are available to Alkira Fuel employees and third parties to report any wrongdoing, including fraud, unethical activity or irresponsible acts. Reports can be made anonymously. Corporate officers nominated in Alkira Fuel policies are trained to conduct necessary investigations and, when required, to design and implement corrective actions.

Measuring effectiveness

Alkira Fuel have reviewed responses to the Supplier Questionnaire. Alkira Fuel have also reviewed the modern slavery policies and statements of several major suppliers. Following these reviews, Alkira Fuel have not identified any material risk of modern slavery practices in Alkira Fuel's supply chains.

During the year, Alkira Fuel refined our Supplier Questionnaire to improve the relevance and clarity of responses. Alkira Fuel will continue to measure our effectiveness in mitigating modern slavery risks to our business by tracking the number of suppliers that respond to our Supplier Questionnaire (or otherwise provide relevant information about their slavery standards).

Alkira Fuel plans to measure and compare metrics on the use and interaction with modern slavery training materials and policy documents, with the aim of achieving year on year improvements. Alkira also plans to conduct an annual refresher training on modern slavery, particularly for our employees who are directly involved in procurement.

Alkira Fuel will continue to regularly review our Supplier Code of Conduct, Supplier Questionnaire and risk assessment processes to ensure they remain up to date and effective in assessing modern slavery risks.

MODERN SLAVERY STATEMENT

This Statement has been endorsed by the Board of Alkira Fuel Management Pty Ltd and Alkira Fuel program Pty Ltd

DOCUMENT CONTROL

Policy name	Modern Slavery Statement
Approved by	Alkira Fuel CEO
Date approved	June 2021
Frequency of review	Annually
Last reviewed	June 2021
Next reviewed	June 2022