

Anti-Modern Slavery Policy

25 June 2020

Iberdrola Australia has the utmost respect for human rights and is committed to seeking out and confronting any modern slavery risk areas we have influence over. We recognise that we can affect human rights not just in our own business operations but in our wider supply chain.

At its broadest, the term 'modern slavery' refers to any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. Modern slavery therefore encompasses slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services. It exists all over the world, including in Australia.

Iberdrola Australia is committed to complying with all applicable modern slavery laws and principles, including the United Nations' (UN) Universal Declaration of Human Rights, as well as assisting our suppliers to do the same.

Iberdrola Australia strives to have a positive impact on all our stakeholders, including our own people and those we do business with. We endeavour to act with fairness and integrity and to treat others with compassion and respect. We encourage transparency and open dialogue on compliance and ethics challenges.

These values and this Policy apply to people and companies who work for Iberdrola Australia or on our behalf, including employees, directors, contractors, consultants, and other representatives.

Iberdrola Australia has high expectations of its supply chain and suppliers can expect high standards from us in return. Our supply chain is an extension of our business and the behaviour of our suppliers reflects our own brand and reputation. Iberdrola Australia expects its suppliers to prioritise human rights as we do and to behave in a way that is aligned with our own values.

Iberdrola Australia also has high expectations of our own people. We recognise that our employees want to be part of a business whose purpose, culture and operations are aligned with their own values, which include acting with fairness and integrity. We do our utmost to exceed these expectations and expect the same from each of our employees.

Iberdrola Australia therefore requires that anyone with concerns relating to possible improper, unethical or illegal practices by Iberdrola Australia raises these with us as soon as possible. Our Whistleblower Policy enables such concerns to be reported confidentially (via telephone or email) and we commit to dealing with all such reports in an honest and responsible way.

To ensure we can meet our legal and ethical responsibilities, Iberdrola Australia is committed to:

- 1. Identifying higher risk suppliers and assessing the modern slavery risks associated with them;
- 2. Setting clear objectives and an action plan for the year ahead;
- 3. Communicating this Policy to our existing suppliers and to new suppliers, as well as making it publicly available on our website;
- 4. Ensuring our employees are aware of the issue of modern slavery and the role they have in combatting it;



- 5. Establishing a procedure for mitigating the risks we identify, and where possible, establishing action plans to remediate non-conformances;
- 6. Conducting periodic reviews of higher risk suppliers; and
- 7. Conducting periodic reviews of this Policy and on the status of its implementation with Iberdrola Australia's leadership team.

This Policy is owned by the General Manager, Corporate Governance and Company Secretary, and was approved by the Iberdrola Australia Board on 25 June 2020.