



# WHAT IF THE SMARTEST DECISION WAS TO INVEST IN THE PLANET?



## Modern Slavery Statement 2021

Released June 2022

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### **ACCIONA INFRASTRUCTURE GROUP HEAD OFFICE**

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# About this Statement

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This Modern Slavery Statement (Statement) has been prepared by the ACCIONA Infrastructure Group (Australia & New Zealand) to address the requirements of the *Australian Modern Slavery Act 2018* (Cth).

The Statement is ACCIONA's second Modern Slavery Statement and covers the period 1 January 2021 to 31 December 2021 in respect of the Australian reporting entities identified under the heading 'Our Operations and Supply Chain' and their owned and controlled entities and their joint venture operations. A description of each of the reporting entities is included that section.

The reporting entities are referred to throughout this Statement collectively and generically as "ACCIONA", "we", "us" and "our".

The term "suppliers" includes suppliers of goods and services, and includes providers of labour hire.

This Statement is the product of collaborative effort and input from our Health, Safety, Environment, Quality & Sustainability (HSEQS), Governance, Compliance & Legal, Project Controls, Operations, Commercial, Human Resources and Marketing & Communications teams across multiple reporting entities.

The Statement was approved in June 2022 on behalf of all reporting entities by the Board of Acciona Infrastructure Asia Pacific Pty Ltd, the most senior holding entity in the Australia & New Zealand Infrastructure Group.

This Statement has not been externally assured. It has been signed by the Chief Executive Officer on page 23.

If you have any feedback regarding this Statement or wish to bring to our attention any risk or activity of concern, please contact:

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<http://canaletico.acciona.com/>





# Letter from the CEO

Bede Noonan

ACCIONA's primary goal is to make a positive contribution to society and the planet.

Several goods and services used in infrastructure development carry high modern slavery risks. As a significant consumer of construction sector specific goods and services, ACCIONA recognises its responsibility to mitigate the risk of modern slavery practices occurring across its diverse business and, by extension, the construction and associated sectors in which those businesses operate. We are committed to discharging this responsibility and demonstrating leadership in the delivery of ethical and sustainable operations.

During 2021, ACCIONA continued to experience challenges in carrying out business operations due to the COVID19 pandemic and extensive lockdowns imposed in many states within Australia. Despite these challenges, the business was again viewed as a critical service during 2021, which enabled our operations to continue. This ensured supply chains could continue to function, and payments could continue to be made to our suppliers.

Closer to home, we have remained connected to our people and committed to improving their wellbeing. I would like to praise the resilience of our workforce and acknowledge their consistent compliance with ACCIONA's various COVID-safe measures. Our workforce are responsible for ACCIONA's success, and I am impressed by, and grateful for, their demonstrated perseverance, agility, optimism and collaboration in the face of the challenges presented by the pandemic.

During 2021, a major focus of ACCIONA's risk mitigation efforts was on procurement practices. We developed new systems to capture supplier data and compliance history, and introduced due diligence tools to assist us in assessing the risk of proposed joint venture and supplier engagement. ACCIONA promoted its Ethical Channel, making it easier for employees to make anonymous whistleblowing disclosures to a committee responsible for investigating and addressing allegations of ethical complaints and breaches.

I am pleased to present this Modern Slavery Statement which provides an overview of our business and efforts during 2021 to mitigate modern slavery risk within our operations and supply chains. In accordance with ACCIONA's Sustainability Master Plan 2025 (SMP2025), we must continue to dedicate sincere and concerted energy to the preservation of human rights as we continue on our quest to design a better planet.

**Bede Noonan**

*CEO & Managing Director*

ACCIONA AUSTRALIA AND NEW ZEALAND

# Statement Highlights

Area	Summary of Actions Completed
 <b>Entities and Structure</b>	<ul style="list-style-type: none"> <li>• A review was undertaken of our structure, operations and supply chains to gain a holistic understanding of ACCIONA internal compliance health and procurement practices during FY21</li> <li>• ACCIONA's reporting entities were identified for the purposes of this Statement</li> </ul>
 <b>Policies and Governance</b>	<ul style="list-style-type: none"> <li>• We updated our downstream contract suite with subcontractors to drive compliance with our policies and protocols related to ethical sourcing</li> <li>• Procurement policies and processes were further developed and improved such as ACCIONA's Risk Map, guiding ACCIONA's decision makers on supplier engagement</li> <li>• ACCIONA's released its Global Sustainability Master Plan 2025 designed to transition the business towards regenerative sustainability impacts and contribution to the UN Global Compact Sustainable Development Goals (SDG)</li> </ul>
 <b>Due Diligence</b>	<ul style="list-style-type: none"> <li>• We gained further understanding of our supply chain, categorising at risk suppliers based on industry and geography to inform risk management processes</li> <li>• An assessment of supplier practices was undertaken on-site in accordance with ACCIONA's SMP25</li> <li>• Our Global Ethical Channel was further promoted to all employees, suppliers and any third party to enable reporting of breaches to our Code of Conduct including occurrences of modern slavery</li> </ul>
 <b>Remediation</b>	<ul style="list-style-type: none"> <li>• ACCIONA is able to monitor compliance and training history records of its employees via its internal platform WorkDay, which was rolled out throughout the business in FY21</li> <li>• An abnormal score on a Supplier Questionnaire, flagged by ACCIONA's Risk Map was recorded following a supplier's on-boarding. ACCIONA ceased trading with that supplier due to their failure to mitigate risk to ACCIONA's satisfaction</li> </ul>
 <b>Assessing Efficiency</b>	<ul style="list-style-type: none"> <li>• Monitoring and analysing compliance audit results, supplier screening tools, communications with suppliers was undertaken. ACCIONA continues to use best efforts to respond to issues identified in a comprehensive, diligent and responsive manner</li> </ul>
 <b>Collaborative Efforts</b>	<ul style="list-style-type: none"> <li>• Key personnel across multiple business divisions, including senior and executive management teams assessed modern slavery risk to ensure a unified and consistent approach was adopted</li> <li>• ACCIONA maintained its on-going commitment to the Infrastructure Sustainability Council – Modern Slavery Coalition</li> </ul>

# Our Structure, Operations and Supply Chain

## What ACCIONA was in 2021

*ACCIONA is an end-to-end developer of sustainable infrastructure based on a distinctive vision of making a positive contribution to society and to the planet, and providing sustainable solutions to the most urgent issues such as global warming and water scarcity. We firmly believe there is a different way of doing business, where each project promotes sustainable development from all three perspectives: environmental, economic and social.*

## Our Structure

ACCIONA is a group unlike any other in Australian infrastructure and construction.

We have earned a reputation, over fifty years, as a leading provider of specialist construction services for sustainable infrastructure.

How? Because construction engineering is at our very core.

Our group brings together trusted and long-standing businesses, from family-owned origins,

combining proven local capability from:

- Geotechnical Engineering;
- Coleman Rail;
- John Beever Australia,

with the major project capabilities of:

- ACCIONA Construction Australia;
- ACCIONA Infrastructure Australia;
- ACCIONA Infrastructure Projects Australia (formerly Lendlease Engineering), and

the international resources of ACCIONA.

Locally, our story traces back to 1972, when Geotech Pty Ltd was founded by the Noonan and Macleod families after a management buyout of Foundation Engineering.

The new group was responsible for some of Melbourne's most iconic projects; names like Collins Place (at the time, the largest excavation in the history of Melbourne), the Melbourne Underground Rail Loop, the Victorian Arts Centre, Citylink and the Burnley Tunnel. Within a few short years, Geotech became a leading ground engineering supplier to large constructors whose projects were defining the Melbourne cityscape.

As the century turned, a new generation of the Noonan family, brothers Bede and Andre, bought the business from their retiring father, adding rail capability with the acquisition of B.T. & K.A. Coleman, an Australian rail contractor that was

founded in 1983, and a mechanical engineering arm with the acquisition of John Beever Australia that was founded in 1979.

These three businesses became known as the Geotech Group of companies.

ACCIONA has been operating in Australia since 2002, when it established a presence in the renewable energy market. Not long after, ACCIONA established its water business in Australia, delivering and operating Adelaide Desalination Plant and Mundaring Water Treatment Plant. 2011 saw the local capability extend to major infrastructure, with the award-winning Legacy Way tunnel in Brisbane marking the beginning of a commitment to sustainably developing major infrastructure the region.

In 2017 the two major businesses joined forces. ACCIONA's acquisition of the Geotech Group in March 2017 harnessed ACCIONA's global expertise to Geotech's local knowledge, creating a complement of family owned businesses that could grow and challenge the established players. Albeit family owned, ACCIONA is a truly global company with over 40,000 employees across five continents, with a business model based on sustainability: infrastructure, renewable energy and water treatment projects.

The 2017 deal was carefully structured to leave Australian equity, management and technical expertise in place, while drawing on ACCIONA's international expertise. The two businesses had a lot in common – family ownership, strong leadership and a commitment to innovation and sustainability. ACCIONA stepped up its multi-billion-dollar investments in renewables and civil infrastructure in Australia, gaining momentum from its newfound access to a long-standing workforce, and no longer having to set up project-by-project.

Late in 2020, ACCIONA acquired Acciona Infrastructure Projects Australia Pty Ltd (formerly Lendlease Engineering), with its valuable pipeline of projects and people capacity. It was another landmark moment for ACCIONA in Australia and further ingrained our Australian roots.

Lendlease Engineering's own history dates to 1912, when Hornibrook Constructions was founded. The evolution of Lendlease Engineering included construction giants such as AW Baulderstone (incorporated in 1946, later becoming Baulderstone Hornibrook in 1985) and G Abigano (registered in 1961, with the name changed to Abigroup in 1988). These companies helped deliver some of Australia's most significant transport and infrastructure projects, such as four of the nation's most iconic bridges in Brisbane's Story Bridge and William Jolly Bridge, Sydney's Anzac Bridge and Melbourne's Bolte Bridge, as well as the new Adelaide Oval, the superstructure of the Sydney Opera House and the M2 Motorway in Sydney.

2021 was a year of harmonisation for ACCIONA following the introduction of the acquired business, Acciona Infrastructure Projects Australia Pty Ltd (formerly Lendlease Engineering Pty Ltd) in late 2020. Significant effort was invested in ensuring we maintained robust and consistent governance practices across the Group. Several transformative initiatives were also developed to improve data collection and interrogation across origination and operations, to provide the executive a means to assess projects' quality, safety, financial and general operating performance, regularly and meaningfully. This data, and the associated assessments, increase the ability for employees at all levels to identify and mitigate modern slavery risks.

## Business Overview – Global

ACCIONA is a global leader in the provision of regenerative infrastructure solutions focused on transitioning to a low-carbon economy. We are a financier, developer, builder and operator of infrastructure solutions, both alongside government and significantly on our own. We have a long and proud history and expertise in infrastructure for transport, renewable energy and water in particular. We also have a strong involvement in social infrastructure and mobility systems.

ACCIONA has a business presence in more than 60 countries, and five years after becoming completely carbon-neutral, in 2021 we recorded sales of over AU\$12 billion: an emphatic endorsement of the business case for decarbonisation.

From an energy perspective, ACCIONA is one of the largest 100%-renewable energy companies in the world. We have no fossil-fuel legacy, and we generate over 13GW of renewable energy in more than 20 countries. In Spain, we operate the nation's longest-serving wind farms, first commissioned in 1994 and 1995, as well as the century-old Siera hydroelectric plant. We care for this heritage alongside the absolute newest technologies.

Hydroelectric energy was part of our very first steps in the energy sector, which provided us with solid experience in this renewable technology. Like us, hydro has achieved its gains quietly. In fact, this renewable energy is now ACCIONA's second-largest global source of power generation after wind power.

And it was hydroelectricity that led us into wind farms, where we are now recognised as a global leader in development, construction, operation and maintenance, with more than 30 years of experience in the sector.

Our years of experience, across a complete portfolio of tailor-made renewable energy solutions, enables our corporate and institutional clients to meet their own decarbonisation goals.

When we talk sustainability, we've got decades behind us.

## Our Reporting Entities

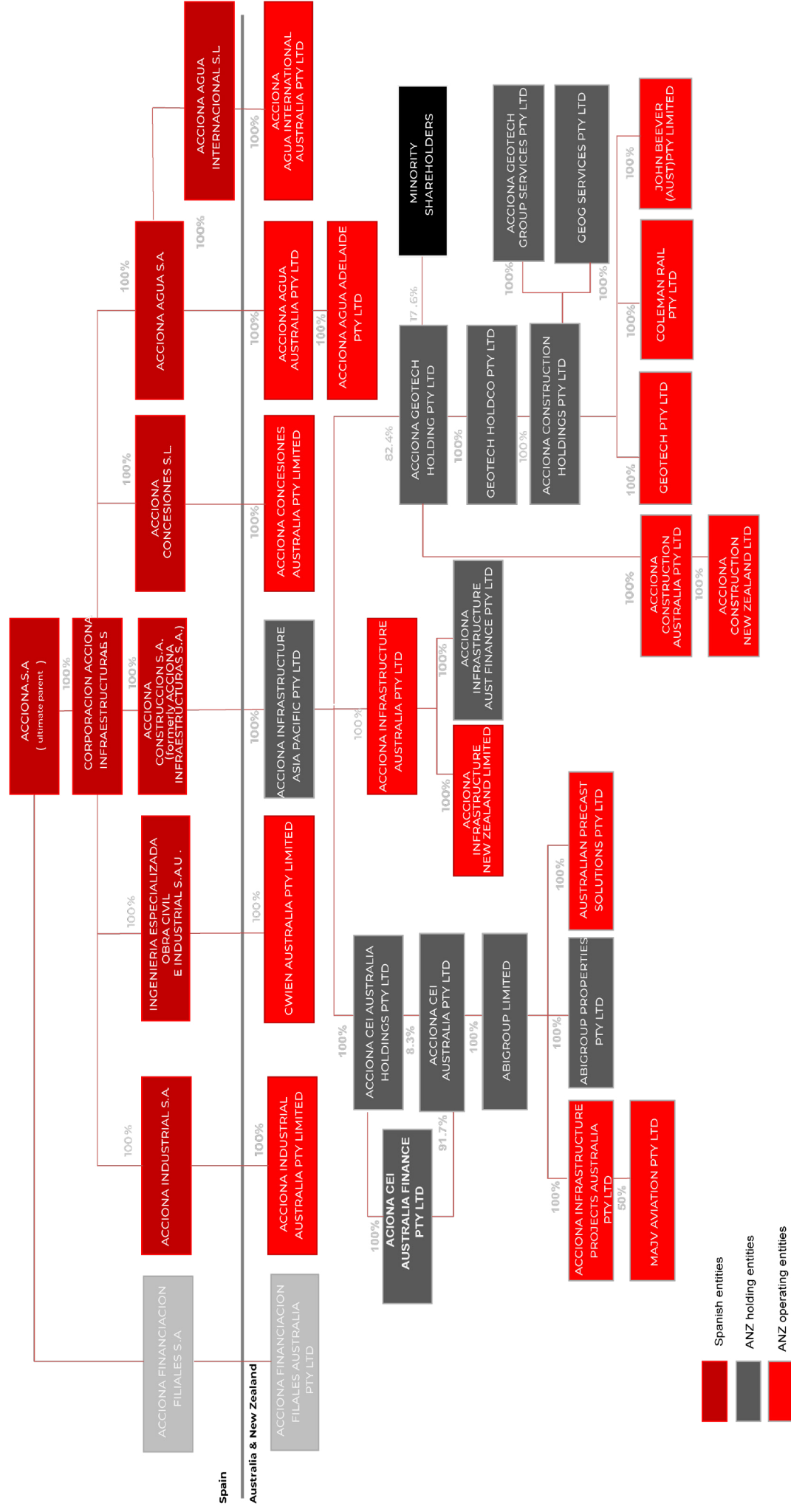
Acciona Infrastructure Asia Pacific Pty Ltd ABN 19 609 210 139 (ACCIONA) is the Australian holding company through which we conduct our operations in Australia and New Zealand. It is the Reporting Entity for the purposes of this Modern Slavery Statement.

This Modern Slavery Statement has been prepared on a consolidated basis and approved by the Board of Acciona on behalf of its controlled entities which are also classified as reporting entities pursuant to section 5(1) of the Modern Slavery Act 2018 (Cth):

- Acciona Construction Australia Pty Ltd (ABN 66 618 030 872)
- Coleman Rail Pty Ltd (ABN 81 101 299 512)
- Geotech Pty Ltd (ABN 94 114 336 515)
- John Beever (Aust.) Pty Limited (ABN 84 006 337 113)
- Acciona Infrastructure Projects Australia Pty Ltd (ABN 40 000 201 516)
- Acciona Infrastructure Australia Pty Ltd (ABN 52 140 915 251)
- Acciona Geotech Holding Pty Ltd (ABN 99 616 868 314)
- Geotech Holdco Pty Ltd (ACN 616 740 820)
- Acciona Construction Holdings Pty Ltd (ABN 59 114 553 454)
- Acciona CEI Australia Holdings Pty Ltd (ABN 50 147 880 966)
- Abigroup Ltd (ABN 63 000 358 467)
- Acciona CEI Australia Pty Ltd (ABN 52 106 594 816)
- Acciona CEI Australia Finance Pty Ltd (ABN 18 122 363 295)

ACCIONA's corporate structure is shown in the diagram on the next page.

**ACCIONA INFRASTRUCTURE  
- AUSTRALIA & NEW ZEALAND**





# Operations

## Our Operations

ACCIONA Construction Australia is our major project delivery arm with expertise in sustainable transport infrastructure solutions including bridges, tunnels, rail, road and public transport, clean energy infrastructure – wind power, solar photovoltaic (PV), waste-to-energy – and water treatment infrastructure alongside our engagement in specialist sectors.

Geotechnical Engineering, our longest-established business, boasts the most experienced ground engineering design and construct team in the nation, with almost fifty years at the frontline of design and delivery.

Coleman Rail is our rail infrastructure business that is approaching twenty years of achievement in this technically complex and challenging arena.

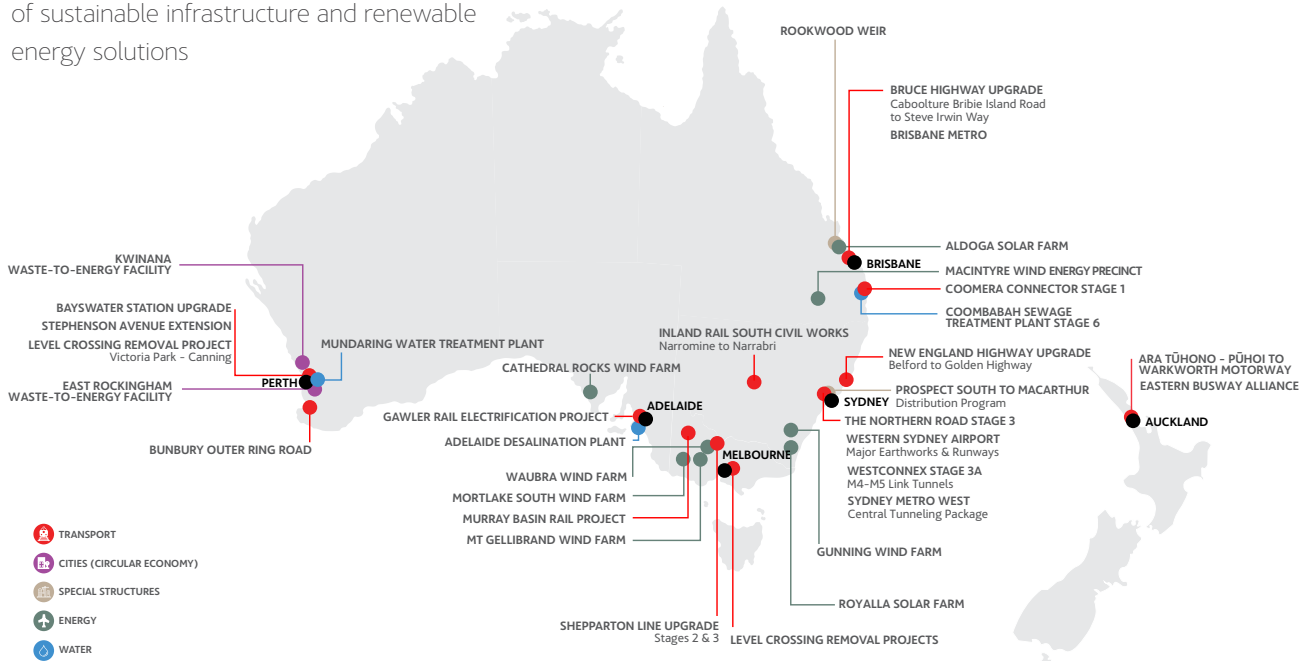
John Beever Australia is a leading structural, mechanical, piping, and electrical company, serving the manufacturing, infrastructure, industrial and renewables sectors.

ACCIONA in Australia also operates in Energy, Concessions and Agua (Water). This Modern Slavery Statement does not reference those entities as they sit outside of the ACCIONA Construction corporate group.

All our entities' executive operations meet centrally at our office in Port Melbourne, where our workers have banged their boots at the door for decades now. The site was an industrial corner of the Yarra River, a working-class stronghold near where we built some of our earliest projects; now it is a suburb on the rise and a home to future technologies. In some ways, Port Melbourne has mirrored our own evolution. We also run corporate offices in Sydney, Brisbane and Perth.

## Experts in designing a better planet

One of Australia's most trusted providers of sustainable infrastructure and renewable energy solutions



## Key Projects

ACCIONA has a unique presence in Australia's urban and regional communities. Both a major investor and an employer, we're a leader in sustainable solutions for infrastructure, renewable energy and water treatment projects.

Our footprint and people capacity enable us to tender for and deliver more projects – large, mid-sized and small – addressing skills shortages and providing much-needed competition at the top end of the market.

As a developer and owner and operator of Australia's renewable energy projects, ACCIONA's portfolio stretches across Queensland, New South Wales, Victoria, South Australia and Western Australia.

We are currently building the runways for Australia's first major new airport in many decades, the Western Sydney Airport. Our work is intended to move people: not only practically, but emotionally.

Completion of our fifth wind farm at Mortlake South in Victoria is imminent and, once operational, will bring our total generation capacity in Australia up to 590MW: enough clean energy to power 422,000 homes.

This year, we are starting construction of the 1GW MacIntyre Wind Energy Precinct: the largest wind farm to be built in Australia and one of the largest onshore projects in the southern hemisphere. We are also advancing the development of the 600MW-peak Aldoga solar farm in Queensland.

All of this has been achieved while maintaining a relatively quiet public profile. Hot air is not our business. What we do offer is the capability and bench strength to deliver on Australia's most urgent infrastructure and renewable energy needs.

## Advanced Approach

ACCIONA offers itself as an expert in designing a better planet, responding to basic infrastructure, water and energy needs through innovative, responsible solutions that produce real progress. ACCIONA's projects span wind and solar farms, tunnels, bridges, railways, light rail, roads, water treatment plants and waste-to-energy plants within Australia.

ACCIONA carries out its business in accordance with the SMP2025. As explained more completely in the Policies and Governance section of this Statement, the SMP2025 documents our company ambitions.

One of those key ambitions is our people centric focus, ensuring fulfilment of the fundamental rights of people who participate in our value systems. To us, this means the rights of people forming part of our value systems are

fulfilled. It means not being complicit in any form of abuse or violation of the rights of workers, suppliers, contractors, service providers, partners, competitors, customers, local communities and society, in any of our activities and in any of the geographies we are present.

The SMP2025 also prescribes the desired leadership of the ACCIONA Board in promoting and overseeing the fulfilment of the company's purpose through its operations at every level. This necessitates the continuous evolution of the company's governance and management systems, and commitment to innovation, to advance its purpose. Authenticity, taking on new responsibilities, and leading by example are key pillars of ACCIONA's leadership and governance model.

## Social Enterprise

Innovation is at the core of ACCIONA. One of our recent success stories is the Northern Connector Project (NCP), an \$867 million road project in South Australia. Our client identified a need to create employment opportunities for displaced automotive workers and other target groups located in the northern suburbs. In response to that need, NorthHub was created; a 'one-stop shop' for vocational education and training, and a forum for other service providers to meet on-site with industry partners, subcontractors and workers. A dedicated 'Employment Development Team' was established to work closely with the NCP Jobs Taskforce to maximise opportunities for local workers.

NorthHub also provided industry engagement support to maximise opportunities for South Australian businesses (including Aboriginal owned businesses) to participate in the delivery of the project and facilitate maximum economic benefit for the local economy.

NorthHub enabled the project to achieve the following metrics for workforce participation and the local industry engagement:

- Local industry economic benefit 91% of all spend to SA businesses
- Over \$15.9M to Aboriginal owned businesses
- Workforce participation of target groups 33% of onsite hours (including 10.1% Aboriginal participation and 5% displaced automotive workers)
- 96.6% of onsite hours performed by SA residents
- 52.1% of onsite hours performed by northern Adelaide residents

This innovation set a new benchmark in the construction industry for workforce engagement and assistance provided to local disadvantage people, displaced automotive workers and Aboriginal people.

# Supply Chain

*In 2021 we contracted approximately 3,400 suppliers across Australia and New Zealand for over \$800M of goods and services. Circa \$3M was spent on social enterprises.*

## Overview

In 2021, ACCIONA on-boarded approximately 1843 suppliers (representing approximately 60% of the procurement conducted across the group) via its Supplier Management System, utilising screening tools ensuring the (ultimately successful) vendors were subject to ACCIONA's procurement management pre-qualification requirements.

Of those, 710 of those suppliers provided building and construction services on ACCIONA projects, joint ventures or alliances which were classified in the following categories:

- Construction, civil and associated services which include (but are not limited to):
  - » Road Pavement Services
  - » Fabrication & Assembly of Steel Structures
  - » Electrical Services
  - » Railroad Works
  - » Installation of Drainage & Sewerage; and
  - » Installation of Concrete Structures
- Engineering and engineering consultancy services
- Environmental management services
- Maintenance and operational services
- Services related to ariel lines and underground cables
- Services related to pipework (including evacuation replacement)
- Services related to substations and transformation centres
- Underground storage services

583 on-boarded suppliers supplied Goods and Products including:

- Chemical products
- Clothing, footwear and personal safety equipment
- Construction and civil works products
- Concrete pipes and accessories
- Electrical lines
- Energy, oil and gas and petroleum products
- Glass, ceramic, rubber, plastics and other products
- Heating and air conditioning equipment
- IT and communications equipment

- Metal and wooden products
- Office and cleaning materials and equipment
- Electrical equipment
- Pavement and coverings products
- Pipes, conduits and accessory parts
- Pumps and accessories
- Railroad materials and equipment
- Ready mixed concrete
- Refinery and thermal generator supplies
- Safety products
- Service station equipment
- Supplies for hydraulic, wind power and other forms of generators
- Transport related products

Lastly, 509 suppliers were classified under the broad 'Services' banner which includes accounting, consultancy, legal, business and administration support, machinery hire, cleaning and waste services.

Of those 1843 tier-one suppliers described above, approximately 98.5% are located in Australia.

This is reflective of our commitment to supporting local economies and developing capability in local communities. Our high proportion of local contracts increases our ability to monitor, assess and engage with our suppliers regarding modern slavery mitigation. It provides us better visibility to identify the risk of our involvement in modern slavery and greater ability to influence and improve procurement standards.

Nevertheless, infrastructure supply chains run deep; many of our suppliers source goods and services from international markets. ACCIONA also directly contracts a small number of overseas suppliers<sup>1</sup>. We are live to the challenge the complexity of infrastructure procurement poses to modern slavery risk assessment and mitigation. ACCIONA will continue to monitor key suppliers within these industries and undertake a targeted approach towards key risk factors of modern slavery within our supply chain.

<sup>1</sup> ACCIONA directly contracted approximately 100 overseas suppliers in 2021

## Management

ACCIONA has a centralised procurement system that exists across the Group in respect of the key operating entities, with policies and procedures governing its operation.

ACCIONA has confidence in its systems, processes and procedures which it will endeavour to negotiate the use of on joint venture projects with its partners.

In some instance where ACCIONA is not principal contractor, our joint venture partner's system may be utilised. These systems are subject to due diligence by ACCIONA to ensure they are a validated equivalent standard. Project procurement activities are overseen at a project level.

Where a joint venture, teams comprise an integrated representation of joint venture parties across all project functions, most relevantly finance, commercial, operations and procurement, ensuring ACCIONA maintains management control. Project activity is overseen by the relevant reporting entity business unit. Business unit procurement management is consolidated in a centralised management and executive team, with additional audit and compliance governance via a centralised HSEQS function and international procurement function.



# Policies and Governance

*ACCIONA's modern slavery mitigation effort is integrated across its Governance system, with high standards embedded in a comprehensive suite of procedures that enshrine ACCIONA's people-centric values in every aspect of its operations.*

## Overview

[ACCIONA's Code of Conduct](#) and Human Rights Policy and Modern Slavery Policy documents our commitment to respecting human rights and public freedoms recognised in the United Nations Universal Declaration of Human Rights. Respect for human rights is the responsibility of all persons and entities to which the Code of Conduct applies, including all businesses and project managers. Our employees, both globally and locally are required to comply with policies and procedures. All employees are required to undertake on-boarding and periodic mandatory training to ensure understanding and increase compliance.

Standards driven towards preventing our involvement in modern slavery are embedded in several of our policies, including:

- Equal Employment Opportunity, Anti-Bullying, and Harassment Procedure
- Leave Procedure (including parental leave details)

- Diversity and Inclusion Policy Statement
- Aboriginal Participation in Construction Procedure
- Grievance Procedure
- Whistleblowing Policy Statement and Whistleblowing Procedure
- [Anti-Corruption Guidelines Australia](#)

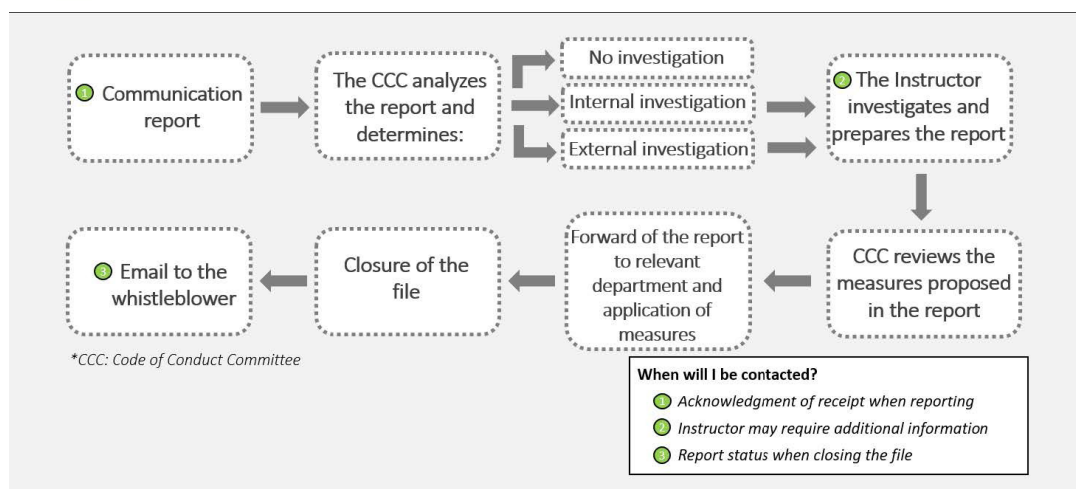
This comprehensive suite of documents set out what we stand for and strive to uphold culturally, and which enshrines the protection of the health and safety of our employees as our priority above all else.

## Ethical Channel

Further to the codes and policies above, our global Ethical Channel provides our employees as well as suppliers or third parties with a mechanism by which they can confidentially report any breach of the Code of Conduct to ACCIONA's Code of Conduct Committee and access solutions for the resolution of such behaviour. This includes any instances of modern slavery and human rights violations more broadly.



## THIS IS HOW THE ETHICAL CHANNEL WORKS



For any doubt or clarification, please contact us at [ACCIONA\\_compliance@acciona.com](mailto:ACCIONA_compliance@acciona.com)  
\*CCC means ACCIONA Code of Conduct Committee

## Sustainability Master Plan 2025 (SMP2025)

In October 2021, ACCIONA launched a new five-year Sustainability Master Plan (SMP) 2025, the company's third successive blueprint for advancing its Environmental, Social and Governance (ESG) goals.

The new plan includes over 80 initiatives that will make a decisive contribution to ACCIONA's leadership in decarbonization and the development of sustainable infrastructure. The key aim of the new Sustainability Master Plan is the introduction of advanced "regenerative measures" that will both enhance sustainability in ACCIONA's projects and multiply the positive impacts of the company's business activities.

Sustainability is integrated into the group's financial management and reporting functions, a pioneering initiative to lend both equal discipline and rigor.

### Integrate to Transform

Through the SMP2025, ACCIONA will establish a forward-looking and demanding management model that is and consistent with the principles of good corporate governance.

ACCIONA believes that to radically transform its business model and continue making progress as an agent for decarbonization, the company's sustainability policies and targets must be implemented, measured and reported with the same discipline and thoroughness as its financial performance. Sustainability and financial strength are inextricably linked. Ensuring they are managed in a complementary way ensures this link is ingrained at every level of the business and removes the risk of conflicting sustainability and financial drivers.

To that end, the financial and sustainability departments into which the Australian and New Zealand operations report are being integrated into a new Economic, Financial and Sustainability Affairs Department, headed by José Ángel Tejero as Chief Financial & Sustainability Officer (CFSO). This is undoubtedly a pioneering move in the corporate world that reflects the importance ACCIONA gives to the excellent execution of its sustainability policies. The change triggers the establishment of several reporting requirements for the local Group, driven by objectives of assessment, transparency and accountability.

### Governance in Operations

ACCIONA's *Supplier Qualification and Evaluation suite* of documents mandate supplier due diligence to verify procurement standards, financial capacity and ethical practices.

There are 17 complementary policies or procedures included in the *Supplier Qualification and Evaluation suite* including a *Supplier Questionnaire* and a *Vendor Interview Form* used for the purposing of collecting supplier data on key risk areas. The suite also contains our No-Go Policy, Risk Country Table and Risk Map of Suppliers.

These requirements within the ACCIONA's Supplier Qualification and Evaluation suite are referred to in more detail in the '*Identifying our risk of Modern Slavery*' section of this Statement.

Prior to submitting a bid for tender to our clients, ACCIONA also mandates due diligence being undertaken on its project partner(s) set out in its '*Project Summary and Investment Case*' pack. The assessment includes an examination of a partner's alignment with our way of working and an assessment of their ethical practices.



# Identifying our risk of Modern Slavery Practices

*ACCIONA consolidated its FY20 efforts to identify and assess the risk of modern slavery practices occurring within its supply chain by implementing a detailed Risk Map Tool to inform its procurement selection procedure.*

## ACCIONA Supplier / Partner Assessment Tools

### Overview

The methods described below showcase how we analyse individual sectors and our supply chain.

The key areas of risk we seek to identify and respond to include supplier integrity, economic, geographic, sustainability, OH&S and processes & systems.

#### ► Risk Map – ACCIONA's Key Supplier Management Tool

ACCIONA's key supply chain risk assessment tool is its Risk Map, adopted globally, and used throughout Australia and New Zealand during FY21. The Risk Map is used to assess and manage risk within ACCIONA's supply chain, identify potential areas for improvement in our dealings with suppliers and support decision-making criteria for procurement.

The Risk Map analyses information from three main sources: (1) information provided by suppliers to the digital supplier questionnaire; (2) data sourced from external risk agencies; and (3) supplier performance following the results of an independent audit.

The Risk Map is partially informed by information received from suppliers in their Supplier Questionnaire. This document informs an assessment of a supplier's conduct from an ethical and system-based standpoint. This enables ACCIONA to identify risks of modern slavery practices, and where required, a supplier's compliance with the *Modern Slavery Act 2018* (Cth).

In addition to supplier-provided information, the Risk Map sources objective data from dedicated risk agencies, including Dun and Bradstreet and Verisk Maplecroft. Risk by geographic location is another factor commonly used to identify an 'at risk' supplier. ACCIONA also utilises the Dow

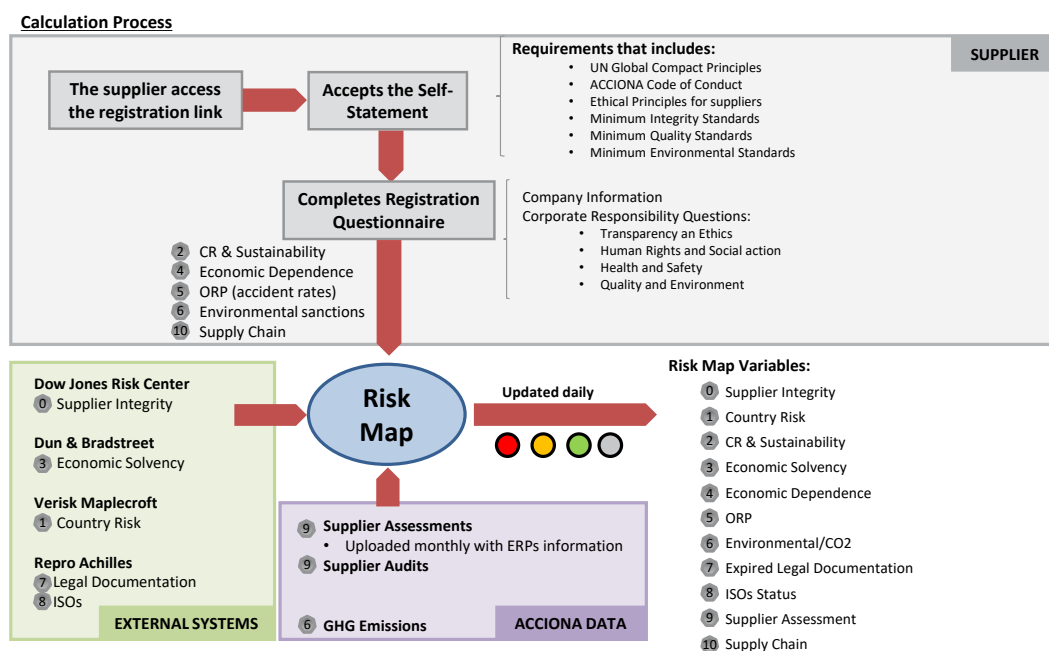
Jones Risk Tool, benchmarking suppliers' geographic ratings against international sanctions, including the UN Sanction List, European Union Sanctions and US Department of Treasury Sanctions in respect of human rights, corruption and working conditions. In light of recent events, Russia, for example, has a higher risk rating since the onset of the War in Ukraine, due to the various economic and human right sanctions introduced across the globe.

Finally, the Risk Map is informed by ACCIONA's Supplier Assessments. In accordance with ACCIONA's SMP2025, ACCIONA is required to engage a third-party independent auditor to audit 2 key suppliers per year, with all facets of a supplier's performance up for review. Following such review, a performance rating/score will be uploaded into the ACCIONA Risk Map by ACCIONA employees.

If a supplier records non-compliance against any key metrics, the supplier will be asked to remediate. If it does not remediate within the designated time frame set by ACCIONA and the independent auditor, ACCIONA will enforce its 'No Go Policy' and terminate the supplier relationship.

A snapshot of the Risk Map's inputs is set out below. The Risk Map is updated every 24 hours with data from our external third parties who have the ability to flag supplier sanctions and adverse media reports and periodically by ACCIONA's employees when new Supplier Questionnaire data is uploaded.

## How is the Risk map calculated.



The Risk Map consolidates the three data input sources for suppliers who record anticipated or actual annual spend of 400,000.00 EUR and generates an automated traffic-light rating against each of the risk variables described below.

## Risk Map Variables Description

The **ACCIONA Risk Map**, a tool for controlling the supply chain that allows for risk management, supports decision-making criteria for procurement and the identification of potential areas for improvement in suppliers. It is an essential mechanism by which to transmit the ACCIONA criteria and policies regarding corporate liability and sustainability to the whole of the supply chain. The Risk map is comprised by 11 variables.

Variable	Description
<b>Supplier Integrity</b>	Acciona investigates the supplier situation in terms of <b>Money Laundering, Tax Haven and Corruption Litigations</b> , and its presence in <b>International Watch Lists</b> . It is updated daily.
<b>Supplier Country Risk</b>	Maplecroft calculates the country risk using the system "Global Risk". Analyzed variables: <b>Corruption, Human Rights, Environmental Regulatory Framework, Working Conditions and Global Risk</b> . They are updated annually.
<b>Corporate Responsibility and Sustainability</b>	The supplier answers to the Acciona Self-Assessment Questionnaire in terms of Sustainability and the score is automatically calculated. Updated when the supplier answer its questions again or due to changes in those questions integrated with third parties.
<b>Economic Solvency</b>	Dun & Bradstreet calculates the solvency downloading the " <b>Risk Indicator</b> " for all suppliers with a purchase amount over than 250,000€. D&B updates the information daily.
<b>Economic Dependence</b>	The supplier answer what their annual sales volume is and it is calculated through the same formula: Purchase amount in the last 12 months / Annual sales volume of the Company. It is updated monthly.
<b>OHS Activity Risk</b>	The supplier provides information about their <b>accidents rates</b> and depending on its activity, they are compared to its sector and country. Information is updated annually and during the qualification process.
<b>Environmental /CO2 Risk</b>	The supplier informs about the existence of <b>environmental legal processes</b> and PROCUR-e identifies if the supplier is amongst the ones with higher emissions of ACCIONA's supply chain. Update annually.
<b>Expired Legal Documentation</b>	PROCUR-e monitors the legal documents status received through external systems, that certify if the supplier is up to date with payments with the <b>Social Security, Taxation Office</b> and if it has a <b>Civil Liability Policy</b> . It is updated daily.
<b>ISOs Status</b>	PROCUR-e monitors the Management Systems status received through external systems, that verify if the supplier has ISOs Certifications. It is updated daily.
<b>Supplier Assessment</b>	Performance assessment of a supply and/or service hired to de supplier/contractor. It is registered in the different Acciona systems by the services/works/hiring departments managers. It is updated monthly.
<b>Supply Chain</b>	It is valued if the suppliers identify, control, assess and offer improvement capacity to its supply chain. Updated when the suppliers updates its questionnaire.

A red traffic light score against any risk variable is grounds for automatic disqualification from the procurement process; ACCIONA concludes a 'No-Go Decision' in its assessment of whether to engage with that supplier.



## ► Supplier Questionnaire

As described above, responses to the *Supplier Questionnaire* inform ACCIONA's procurement approach. Our Supplier Questionnaire focuses on a number of due diligence areas including 'Human Rights and Social Actions' and 'Transparency and Ethics' designed to elicit targeted responses from our suppliers.

In addition, our *Vendor Interview Form*, a checklist in evaluating tenders once the initial supplier assessment is complete, has a focus on sustainability and workforce participation metrics. It also requests details from the supplier as to the demographic of people that will be engaged on the project such as local workers and Aboriginal and/or Torres Strait Islander employees.

## ► Dedicated Risk Agencies

The *Dow Jones Risk Tool* identifies whether an entity (supplier or joint venture partner) appears on a sanction list, reports all news associated with that party and provides a resultant risk rating via a traffic light system.

If the tool returns a green result, no further analysis is required and subject to its other due diligence, ACCIONA will proceed with the joint venture relationship.

If the result yields a yellow or red light, ACCIONA must send the relevant entity a Responsible Suppliers Declaration (Declaration), to elicit certain undertakings with respect to ethical standards of practice. The Declaration sets out principles which the third parties must agree to in respect of human rights labour, environmental and anti-corruption topics. The Declaration also directs the user to [ACCIONA's Anti-Corruption Guidelines](#) and Ethical Principles for Suppliers, Contractors and Collaborators.

ACCIONA will not proceed to the mitigation assessment phase of the due diligence until the Declaration is returned.

Once ACCIONA is satisfied with the due diligence steps above, the *Dow Jones Risk Tool* takes the user to a risk mitigation section to set out appropriate risk management responses for management's review. An example might be that a global company has a related entity that has recorded a sanction on a global watchlist. A mitigant in response might be that the ACCIONA employee has sought confirmation from the relevant party that the entity in question who has recorded the sanction will not be involved in the transaction.

## ► Supplier Assessments - Vendor Interviews

The Vendor Interview is conducted with short-listed suppliers prior to final award of procurement packages. This process is typically conducted on-site/in-person to ensure

ACCIONA project staff can assess the supplier's responses to the Supplier Questionnaire and validate compliance.

For example, where a supplier nominates that they do not have their own management plans, processes or procedures, ACCIONA will make it clear that the supplier must operate to ACCIONA's requirements, ensuring a minimum standard across all subcontractors.

## ► Contract Evaluation Process

ACCIONA demands that its projects are comprehensively reviewed at all stages of developments, from pre-tender, during tender development, delivery and post-delivery. An important focus of the reviews is procurement – strategy, governance, compliance, quality and financial management. Procurement review is undertaken cross-functionally, involving management, operations, legal, commercial, project controls and finance functions to assess and manage risk and capture learnings for future projects, continuously driving improved performance. Reviews are generally undertaken monthly by Regional Managers with Project Leaders.

## ► Collaborative Relationships – Working with our Joint Venture Partners

It is critically important that ACCIONA aligns itself with entities which share a similar commitment to eliminating modern slavery practices and diligence to adopting ethical and robust procurement practices.

An imbalanced pairing risks inconsistent and compromised decision-making, for example where cost drives procurement selection, rather than ACCIONA's more holistic approach. ACCIONA looks for partners who implement equally robust procurement practices, as evidence of their procurement and governance maturity and integrity and as an indication of partnering alignment.

As noted in an earlier section of this Statement, ACCIONA seeks to identify risks prior to engagement with our partners. The Dow Jones Risk Tool plays an important role in the assessment, in conjunction with ACCIONA's own review (of HSEQS, Finance, HR and operational performance) and ongoing collaborative discussions to align on values, strategy and objectives. We recognise that a collaboration and shared values can significantly contribute to reducing the risks of modern slavery practices occurring in project supply chains.

## ► Climate Change and Modern Slavery

It is well documented, and easily accepted, that climate change increases the risk of modern slavery.

Changing weather and environmental degradation poses a risk to homes and income sources. That impact is amplified for those already underprivileged, resulting in greater inequality across the population and increasing migration, in some instances, exposing the vulnerable to exploitation.

As climate change increases the risk to freedom and security, low-income communities will disproportionately be exposed to high-risk behaviour, increasing the chances of becoming victims of modern slavery.

ACCIONA's effort in social procurement and environmentally responsible practices are enshrined in the SMP2025.

The SMP2025 aims to make a positive contribution to the recovery of the planet's resources. ACCIONA aspires to go beyond carbon neutrality, which the company achieved in 2016, by having "a positive impact on natural capital". To do so, it will develop initiatives across four areas: climate, biodiversity, circular economy and water management.

Initiatives include new "zero waste" business models and the provision of water treatment and production services using advanced technologies. Under the plan, ACCIONA will ensure that 90% of its investments are classified within the European Commission's taxonomy of sustainable activities that contribute significantly to the decarbonization of the economy.

ACCIONA will certify the use of 100% renewable energy in all its business projects with blockchain technology, particularly with the green-chain application, developed by the company.

The company also commits to reducing emissions by up to 60%, by accelerating the electrification of business and management processes. It will also apply "nature-based solutions" where necessary (equivalent to planting and conservation of one million trees) to neutralize the company's carbon footprint.

To increase the circularity of ACCIONA's business activities, the company will double the use of recycled products and halve the waste destined for landfill. The company has set a target of cutting its Water use by 50%, especially in places with severe water stress.

In the broadest sense, the mitigation of modern slavery risks is partly achieved by reducing climate change. In that sense, ACCIONA recognises the inextricable link between its environmental sustainability efforts and social justice.

# Remediation

## How ACCIONA addressed modern slavery risk

*ACCIONA has addressed modern slavery risk by focusing on a number of internal operations. This includes the introduction of a new employee platform to monitor training history records, and responding to data gleaned from our Risk Map in relation to supplier conduct. Our collaboration with like-minded industry organisations who aspire to drive good practice and our initiatives with respect to diversity, supported by the release of our Sustainability Master Plan 2025, further underpin our efforts.*

## Employee standards and engagement

Our workforce consists of professional and frontline employees, all of whom are subject to the robust regulatory frameworks of Australia and New Zealand.

Our employees are either subject to:

- An Enterprise Bargaining Agreement (lodged with the Fair Work Commissioner and negotiated to achieve mutually beneficial outcomes for both the employee and employer);
- The National Employment Standards (NES) and applicable modern awards, of which ACCIONA ensures all employees are remunerated at or above award rate and NES conditions are met; or
- Casual employment arrangements, where their terms are reviewed each year to ensure any minimum wage rises are passed on.

ACCIONA also regularly gained insights from its employees by collecting data from bi-annual employee engagement surveys in relation to ethics, collaboration, diversity and inclusion and commitment to delivering on ACCIONA's SMP25.

ACCIONA's engagement score increased by 10% in the second survey with strong engagement recorded among our frontline employees. This is important to us, as we're very proud of our loyal and strong frontline workforce, which remains a great point of difference for us in the industry. Ethics and collaboration metrics also scored highly. Diversity and inclusion and the work environment scored well with some room for improvement. ACCIONA has committed to action plans for 2022 to drive improvement in this space.

## Training and compliance - WorkDay

In 2021 ACCIONA rolled out a Group-wide online human resources and training platform, Workday. Via Workday, ACCIONA monitors compliance and maintains comprehensive training history records of its employees.

WorkDay enables ACCIONA employees within Australia to have their own dedicated dashboard to access information relevant to the ethical standards and behaviour expected of ACCIONA employees. Compliance with respect to ethical standards training and employee declarations is also tracked to identify knowledge gaps or areas where risks may arise within the business.

## Procurement

In relation to matters identified from due diligence, ACCIONA undertook the following actions:

### ► Risk Map Review

ACCIONA requested a supplier engaged by Acciona Infrastructure Projects Australia Pty Ltd prior to its acquisition (formerly Lendlease Engineering Pty Ltd) to complete the relevant Supplier Questionnaire, which identified a higher than acceptable safety risk score. Upon further investigation by senior ACCIONA project staff it was determined that the risk rating was driven by the supplier:

- being a labour hire company (i.e., Low permanent staff but large workforce of contractors); and
- having 20 serious incidents over the last 12 months.

The qualification tool identified x incidents/ permanent staff and flagged the issues.

Staffing structure aside, the volume of incidents was notably higher than expected so ACCIONA's supplier management team discussed the findings with the project team. The project team subsequently stopped trading with that supplier after investigations uncovered a failure to mitigate key risks on project sites.

### ► Vendor Interview – On Site visits

ACCIONA also mandates that on-site audits are carried out to 'eye-ball' the supplier on their responses to the *Supplier Questionnaire* and *Vendor Interview Form*.

Audits were performed on-site across multiple days on a civil contracting company and a supplier of building and construction materials in January and February 2022 (due to COVID related impediments across Australia during 2021). Several safety issues for employees of that particular supplier were identified which were then flagged as 'No Go' by ACCIONA due to the delays in rectifying issues of non-compliance. Such issues were ultimately rectified to ACCIONA's satisfaction, and the supplier was re-engaged after setting out its commitment to adhere to ACCIONA's policies and procedures.

### ► General Contracting Clauses

During 2021, ACCIONA updated its set of precedent agreements to ensure suppliers are, amongst other matters, contractually bound to comply with all reasonable initiatives, requirements and requests for information for the purposes of ACCIONA's compliance with modern slavery laws. It also mandates that suppliers implement due diligence procedures for its personnel and other participants in its supply chains to ensure compliance with modern slavery law and to regularly conduct investigations into its operations and supply chains to ascertain whether there are any instances, or is risk of, modern slavery.

## Collaboration & leadership

### ► Infrastructure Sustainability Council – Modern Slavery Coalition

ACCIONA has been a participating member of the Infrastructure Sustainability Council (ISC) Modern Slavery Coalition since 2020. The Coalition consists of like-minded industry organisations who aspire to drive good practice within the sector through collaboration and leadership.

Following an initial period of consolidating the groups understanding of modern slavery risk and shared experiences, the focus quickly shifted towards supply chain collaboration and the necessary engagement required to effectively assess and address modern slavery risks.

It was acknowledged early that abolishing modern slavery in all its forms would require a whole of supply chain approach and that early and transparent engagement would be critical to the success of any management approach. We were also cognisant and acknowledged that organisation and supply chain partners would be at different points of the modern slavery maturity spectrum but all working towards the

same outcome, abolishing modern slavery risk within our operations and supply chain.

To this end, the Modern Slavery Coalition commenced an exercise of engaging with suppliers from two common commodities within the industry who were identified as having a potentially higher prevalence of modern slavery risk due to their complex and extended material supply chains. These were personal protective equipment (PP&E) and bitumen suppliers.

This piece of work provided insight into meaningful methods of engagement with suppliers and the challenges faced within the supply chain, at all levels, to identify and mitigate modern slavery risks. The results of this collaboration piece are currently being populated by the ISC Modern Slavery Coalition members prior to industry release.

In 2022, we look forward to working with ISC and other coalition members to develop practical tools such as a Modern Slavery Leadership Statement endorsed and promoted by ISC Members and a Supplier Risk Template (currently prepared in draft form) to upskill suppliers and provide them with the necessary tools to critically analyse their supply chains.

### ► Diversity Innovation Market and Industry Forums

ACCIONA is committed to wellbeing, equity and the removal of discriminatory practices in Australian workplaces. To advance that ethos, the establishment of forums to discuss a range of issues and the creation of an environment where discussions with co-workers can occur free from prejudice is critical for ACCIONA.

ACCIONA celebrates International Women's Day, a day that sees progressive employers amplify their commitment to women and celebrate achievement. In 2022 we expanded on our commitment to gender equity by hosting our inaugural Diversity Innovation Market. The ongoing forum will provide a platform for knowledge sharing and encourage entrepreneurial thinking regarding Equality, Diversity and Inclusion. The forum is also an opportunity to highlight some of the amazing work being done on our projects, in our offices and by our people.

The live event was watched by hundreds of ACCIONA employees across our workplaces in Australia and New Zealand.

ACCIONA is also a member of the National Association of Women in Construction and Roads Australia and participates in both the Australian Constructors Association Commercial Working Group and the Construction Industry Leadership Forum Procurement Reform Workstream.



In 2022, we also established the Executive Women's Networking event to bring together senior female leaders across diverse industries to engage in an ongoing cross-industry conversation on the topic of women's leadership in shaping sustainable futures.

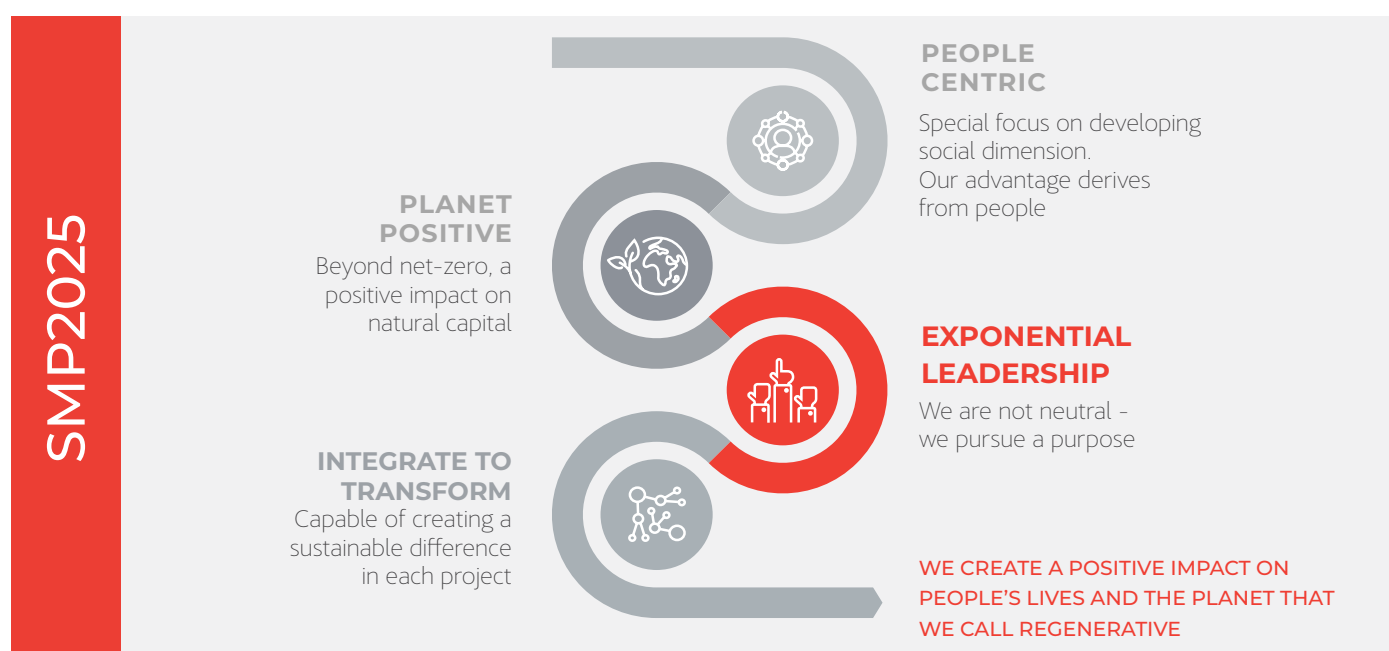
Our participation in existing infrastructure forums enables ACCIONA's voice to contribute to industry thought leadership – particularly around risk allocation (e.g., for site conditions, utilities), engagement between government and industry regarding the pipeline of projects hitting the country and the way in which projects are procured (including the contract model selection). These forums are also an opportunity to be heard on emerging issues (e.g., the impact of the COVID-19 pandemic and escalating costs of materials, skills / personnel shortage, and so on). Our establishment of new forums with more diverse participation also provides an opportunity for ACCIONA to expand thinking, its own and others', by exposing organisations and individuals to new ideas and draw on each other's learning to promote wellbeing, equity and sustainable business growth.

#### ► ACCIONA Sustainability Master Plan 2025 - Exponential Leadership

As noted in the Policies and Governance section of this Statement, in 2021, ACCIONA released an updated Sustainability Master Plan 2025 designed to transition the business towards regenerative sustainability impacts and contribution to the UN Global Compact Sustainable Development Goals (SDG). Sustainability is core to the ACCIONA business, and we are cognisant that infrastructure significantly contributes to attainment of SDG goals globally through the assets we design, deliver and operate.

As leaders in sustainability, ACCIONA is proud of its proven track record and recognition in this space, notably:

- ACCIONA, a carbon neutral company since 2016, was selected in 2020 by Corporate Knights, for the fourth consecutive year, as one of the hundred most sustainable companies in the world, out of 8,080 firms evaluated with turnover of over US\$1 billion, for its performance in economic and ESG indicators.
- ACCIONA also reaffirmed its position as the world's "greenest" electricity generation company for the sixth consecutive year, according to the "New Energy Top 100 Green Utilities" ranking published annually by Energy Intelligence.
- It also closed 2020 as the leading electricity company in terms of sustainability, according to the Sustainability Yearbook 2021, carried out by S&P Global. ACCIONA, with a rating of 90 points out of 100, is the leading group in the ranking's electricity sector.
- In 2020, ACCIONA carried out for the third consecutive year the classification of its activities according to the criteria established by the European Union's sustainable finance taxonomy. The company also published and verified its degree of alignment with the demanding parameters of contribution to a low-carbon economy set by the taxonomy; 85% of its CAPEX and 84% of its EBITDA meet the requirements established in relation to climate change mitigation.



# Looking forward – 2022 and Beyond

## What ACCIONA will be in 2022?

### Assessing Effectiveness

We recognise that our effort to mitigate the risk of modern slavery practices occurring in our business is not a short-term focus or initiative-specific response; it is integral to our people-centric values and achievement of our sustainability goals.

It is therefore essential that we continuously assess the effectiveness of our mitigation efforts through regular compliance monitoring and analysis, reviewing audit results, supplier screening tools, communication with suppliers and responding a comprehensive, diligent and accountable manner to any issues or grievances identified.

Of course, those efforts are underpinned by our people and our ability to ensure we equip our employees with the knowledge to identify actual or potential issues and areas of concern and report such issues or concerns without hesitation.

### What next?

ACCIONA is dedicated to continuous improvement to its operations and supply chains and mitigating the risk of modern slavery across its businesses. We are currently focussed on the following monitoring, assessment and improvement initiatives:

#### ► Governance

- Continue to monitor compliance with our policies and protocols, regularly assess implementation and the sufficiency of our procedures in delivering against the objectives and implement changes where necessary. For example, ACCIONA will continue to ensure that all suppliers complete the Supplier Questionnaire prior to onboarding when using ACCIONA's preferred Supplier Management System described under the heading 'Identifying our risk of Modern Slavery Practices'.

#### ► Training & Compliance

- Implement targeted training on modern slavery to improve ACCIONA employees' ability to identify modern slavery risks. The training will be in addition to the online global training sessions available to all ACCIONA staff, launched in 2019.

#### ► Consultation

- Provide more specific training in ACCIONA's policies and procedures, and increase communication regarding the importance of due diligence and monitoring.
- Increased focus for Human Resource functions to monitor mandatory training records in WorkDay.
- Provide more specific training in ACCIONA's policies and procedures, and increase communication regarding sanction lists and the importance of due diligence and monitoring.

#### ► Reporting/Remediate

- Make our Whistleblowing Policy, and our whistleblowing channels, more accessible for employees and third parties to access, including by making it available on ACCIONA's website, and monitoring modern slavery related reports.

#### ► Benchmarking

- Utilise expanded networks to assess our performance and initiatives and to identify innovative approaches.

#### ► Industry Leadership

- Actively contribute to industry improvement via those networks, in particular by participating in the ICSA Modern Slavery Coalition working group.
- Drive change with suppliers by developing practical tools such as a Modern Slavery Leadership Statement endorsed and promoted by ISC Members and a Supplier Risk Template (currently prepared in draft form) to upskill suppliers and provide them with the tools to critically analyse their own supply chains.

#### ► Monitoring Risks

- Incorporating post delivery feedback with respect to procurement into the Risk Map. This would include the suppliers' performance on all commercial, ethical and risk matters to ensure ACCIONA has relevant data on suppliers who are likely to be engaged on future projects.

This effort is aligned with ACCIONA's key commitment to creating a better, sustainable future for all.

# Consultation with Entities across our Group

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ACCIONA recognises that each entity within its Group, including each of the reporting entities, plays an integral role in mitigating our risk of involvement in modern slavery.

This Statement was prepared in consultation with each reporting entity referred to in section 'Our Structure, Supply Chain and Operations' and several controlled entities. That consultation was enabled by:

- direct engagement with key stakeholders across the ACCIONA Infrastructure Group, including the reporting entities, specifically the executive team and senior managers from Health, Safety, Environment, Quality & Sustainability (HSEQS), Governance, Compliance & Legal, Project Controls, Operations, Commercial, Human Resources and Marketing & Communications.
- ACCIONA's management structure, specifically:
  - » vertical integration of its functional departments operating across reporting entities facilitating an ease in information sharing and centralised access to data; and
  - » regular and comprehensive Group management and executive reviews and meetings promoting a culture of collaboration and continuous improvement, not only for Statement preparation, but in day-to-day activities.

The reporting entities have a shared company secretary, who co-drafted this Statement. They also have a common Chief Executive Officer and overlapping directors, who reviewed this Statement prior to its endorsement by the Board.

I confirm this Statement was approved by the Board of Acciona Infrastructure Asia Pacific Pty Ltd.



**Bede Noonan**

*Director and Chief Executive Officer of the reporting entities*

# Appendix A

## How our Statement addresses the requirements of the Modern Slavery Act

Modern Slavery Act requirement	Reference in this Statement
Identify the reporting entity	'Our Structure, Operations and Supply Chain – Our Reporting Entities – Section 2
Describe the reporting entity's structure, operations and supply chains	Our Structure, Operations and Supply Chain – Section 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Identifying our risk of Modern Slavery Practices – Section 3
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Remediation – How ACCIONA addressed modern slavery risk – Section 4
Describe how the reporting entity assess the effectiveness of such actions	Looking forward – 2022 and beyond – Section 5
Describe the process of consultation with (a) any entities the reporting entity owns or controls; and (b) for a reporting entity covered by a joint statement, the entity giving the statement	Looking forward – 2022 and beyond – Section 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Throughout the Statement



# Appendix B

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## Reporting Entities

- Acciona Infrastructure Asia Pacific Pty Ltd ABN 19 609 210 139 (**ACCIONA**) – is the Australian holding company through which we conduct our operations in Australia and New Zealand. It is the Reporting Entity for the purposes of this Modern Slavery Statement.
- Coleman Rail Pty Ltd (ABN 81 101 299 512)
- Geotech Pty Ltd (ABN 94 114 336 515)
- John Beever (Aust.) Pty Limited (ABN 84 006 337 113)
- Acciona Infrastructure Projects Australia Pty Ltd (ABN 40 000 201 516)
- Acciona Infrastructure Australia Pty Ltd (ABN 52 140 915 251)
- Acciona Geotech Holding Pty Ltd (ABN 99 616 868 314)
- Geotech Holdco Pty Ltd (ACN 616 740 820)
- Acciona Construction Holdings Pty Ltd (ABN 59 114 553 454)
- Acciona CEI Australia Holdings Pty Ltd (ABN 50 147 880 966)
- Abigroup Ltd (ABN 63 000 358 467)
- Acciona CEI Australia Pty Ltd (ABN 52 106 594 816)
- Acciona CEI Australia Finance Pty Ltd (ABN 18 122 363 295)



BUSINESS AS **UN**USUAL