

COMPANY POLICY

Modern slavery

Enervia Engineering Pty Ltd — Management system

POLICY NUMBER

AD-POL-113

REVISION

2

EFFECTIVE

18 August 2026

NEXT REVIEW

August 2027

Policy Control Record

Policy number	AD-POL-113 Rev. 2
Policy owner	Director
Approved by	Amir Jesmi, Managing Director
Applies to	All Directors, employees and contractors of Enervia, and all procurement and engagement of third-party suppliers, subcontractors and service providers
Review cycle	Annually, or on material change
Supersedes	AD-POL-113 Rev. 1 (Version 1.0, 7 November 2025)
Issued by	Enervia Engineering Pty Ltd, ABN 95 685 116 018 - STE 301, 77 Pacific Highway, North Sydney, NSW 2060

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1 Purpose

This policy sets out Enervia Engineering Pty Ltd's ("Enervia") commitment to identifying and addressing the risk of modern slavery and human trafficking within our business and supply chain. Enervia condemns all forms of modern slavery, including forced labour, debt bondage, human trafficking, child labour, and deceptive recruiting.

2 Scope

This policy applies to:

- All directors, employees, and contractors of Enervia
- All procurement and engagement of third-party suppliers, subcontractors, and service providers

3 Definitions

TERM	MEANING IN THIS POLICY
Modern slavery	Serious exploitation of a person, including forced labour, debt bondage, human trafficking, servitude, forced marriage, the worst forms of child labour and deceptive recruiting for labour or services.
Forced labour	Work or service exacted from a person under the menace of a penalty, and for which the person has not offered themselves voluntarily.
Debt bondage	A pledge of personal services, or those of a person under another's control, as security for a debt where the value of the services is not applied to discharging the debt.
Human trafficking	The recruitment, transport, transfer, harbouring or receipt of a person through threat, force, coercion or deception for the purpose of exploitation.
Child labour	Work that deprives children of their childhood, potential or dignity, or that is harmful to their physical or mental development, including work below the applicable minimum working age.
Deceptive recruiting	Recruiting a person for work or services by deceiving them about the nature, conditions, pay or freedoms associated with that work.
Supply chain	The products and services, including labour, that contribute to Enervia's own products and services, however they are sourced.

4 Policy requirements

4.1 Legislative position

The Australian Modern Slavery Act 2018 (Cth) requires entities with annual consolidated revenue of AUD \$100 million or more to prepare and submit an annual Modern Slavery Statement. As a small business, Enervia is currently below this threshold and is not required to submit an annual statement.

Enervia nonetheless adopts this policy as a matter of ethical business practice and in recognition of our obligations as a supplier to larger regulated entities.

4.2 Business and supply chain

Enervia is an Australian electrical engineering consultancy providing the full spectrum of power and electrical engineering services, including substation design, renewable energy generation design, protection and control, power systems studies, BESS integration, transmission and distribution network design, and owner’s engineer services. Our supply chain is primarily comprised of:

- Professional engineering software vendors (primarily Australian and multinational technology companies)
- Specialist technical subcontractors (Australian licensed engineers and drafting professionals)
- Office supplies and equipment suppliers

The nature of Enervia’s business — a professional services firm operating entirely within Australia — represents a low inherent risk of modern slavery exposure. Our suppliers are predominantly Australian-registered entities subject to Australian employment law.

[Drafting note — this policy is incomplete. The superseded revision ended at this point. Sections covering expected conduct and commitments, supplier due diligence and screening, contractual requirements, training and awareness, and reporting and grievance arrangements remain to be drafted before this policy is issued externally. Delete this note once those sections are added.]

5 Responsibilities

ROLE	ACCOUNTABILITY UNDER THIS POLICY
Managing Director	Approves this policy and holds ultimate accountability for Enervia’s response to modern slavery risk.
Directors	Own this policy, assess modern slavery risk in the business and supply chain, and decide on any supplier engagement where a concern is identified.
All personnel	Comply with this policy, and report any suspected instance of modern slavery in Enervia’s business or supply chain to a Director.
Suppliers, subcontractors and service providers	Comply with applicable modern slavery and employment legislation, and respond to Enervia’s enquiries about their labour practices and supply chain.

6 Compliance and monitoring

Any suspected instance of modern slavery in Enervia’s business or supply chain is to be reported to a Director, who will assess the matter and determine the appropriate response, including whether to suspend or terminate the supplier relationship and whether the matter must be referred to an external authority. Concerns raised in good faith carry no adverse consequence for the person raising them.

Detailed monitoring arrangements — including supplier screening, contractual requirements and periodic review of the supply chain — are to be defined as part of the outstanding sections identified in clause 4.2.

7 Revision history and approval

REV.	DATE	CHANGE	APPROVED
1	07/11/25	First issue. Prepared V. Mazhari; reviewed M. Fonseca; approved A. Jesmi.	A. Jesmi
2	18/08/26	Reissued in the current Enervia policy template. Content restructured into standard policy sections; definitions, responsibilities and compliance sections added. Policy remains incomplete — see drafting note at clause 4.2.	A. Jesmi

PREPARED BY	REVIEWED BY	APPROVED BY	DATE
M. Fonseca	V. Mazhari	A. Jesmi	18/08/2026