



Modern Slavery Statement 2025

Mandatory reporting criteria of the Modern Slavery Act

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act 2018 (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

SECTION IN THIS STATEMENT	MSA CRITERIA
1. Message from the Board and Executive Summary	Identify the reporting entity
2. About Contact	Describe the reporting entity's structure, operations and supply chains
3. Risks of modern slavery practices in our operations and supply chain section	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. Actions to address identified risks	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes
5. Effectiveness of our Actions	Describe how the reporting entity assesses the effectiveness of these actions
6. Consultation and Approval Process	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

1. Message from the Board

Contact Energy (Contact) is committed to creating a sustainable energy future for New Zealand and putting our energy where it matters. We value ethical collaborative relationships with our business partners and suppliers, and care deeply about the safety and wellbeing of our people, customers, communities, and environment.

Contact is also strongly committed to treating all people, both inside and outside the company, with dignity and respect.

We work to ensure that our operations are conducted in accordance with all regulatory compliance requirements, and we take a partnership approach with tangata whenua to manage whenua, awa and other taonga. We act with integrity and authenticity and make sound decisions knowing they'll be subject to scrutiny. We uphold and promote human rights within our areas of influence, engaging with stakeholders and communities on the development of solutions to issues that affect them.

Contact is committed to improving our people's health, safety and wellbeing, to promoting diversity and inclusion and to safeguarding human rights across our operations and supply chain. We communicate our expectations of similar conduct from our suppliers, but we also recognise that we have a much bigger role to play in working with them to understand their own supply chains, to share information and support a greater focus on modern slavery risks.

We are now moving into the fifth and final year of our Contact26 strategy – the strategy to build a better Aotearoa New Zealand by leading the country's decarbonisation. Looking ahead to our Contact31+ strategy we remain committed to strong environmental, social and governance (ESG) practices, and focussed on growing demand for the energy we generate, growing our diverse portfolio of renewable energy, supporting the renewable transition through decarbonising our portfolio and supporting others in New Zealand to do the same.

During FY25 we have strengthened our approach to procurement in a way that reduces modern slavery risks, investigated some higher-risk areas in detail, and extended online modern slavery training to our people. Our modern slavery governance framework is providing improved visibility of potential risks across the business.

While we recognise the limitations in fully uncovering and mitigating all potential modern slavery risks in complex supply chains, we are committed to continuous improvement in our efforts and approach.

This Statement is made jointly on behalf of Contact Energy Limited ("Contact"), its wholly owned subsidiary, Western Energy Services Ltd (Western) and its joint ventures. It reports on the assessment of modern slavery risks, the governance framework and activities to minimise modern slavery risks in all entities' operations for the twelve months ending 30 June 2025 ("FY25"). It has been approved by the Board of Contact Energy Limited.

Executive Summary

Contact believes in touching lives, to make life better. We are committed to respecting human rights and to responsible procurement activities in partnership with our suppliers. In line with these commitments, we continue to work to improve our operations and those of our supply partners with the goal of identifying, preventing, and remediating modern slavery risks.

In FY25 we focussed on strengthening our procurement system to improve supplier screening, updating our standard contracts to include modern slavery clauses, conducting 'deep dives' into selected areas of our supply chain and producing an online modern slavery training video for employees. We continued to address areas identified for improvement in our FY24 independent business assurance review.

We had no reported incidents of slavery or human trafficking in FY25. However, we are aware that modern slavery and human rights breaches can be difficult to detect. We are committed to improving our processes to better identify, address, and combat occurrences. In FY26 we will continue our series of risk-based, extended supply chain reviews, work more closely with our suppliers to offer training and improvement assistance with their modern slavery approaches where required, and build on our understanding of our own supply chain to lift our capability in this area.

2. About Contact

Our operations and supply chain

Contact is one of New Zealand's largest listed companies, generating electricity from hydro, geothermal and thermal fuel sources and supplying electricity, natural gas and LPG products. We also provide broadband and mobile services.

We own and operate twelve power stations: the Taranaki Combined Cycle and Stratford Peaker Plants in Taranaki, Tauhara, Te Huka, Ohaaki, Poihipi, Wairākei and Te Mihi in Waikato, Whirinaki in Hawke's Bay, and Clyde and Roxburgh in Central Otago. In the past four years we have committed more than \$2.38 billion to build the critical infrastructure New Zealand needs. This includes \$1.24 billion of completed geothermal development with our Tauhara and Te Huka 3 geothermal stations. A further \$1.14 billion is currently under construction with our Glenbrook grid-scale battery, our Kōwhai Park solar JV with Lightsource bp, and Te Mihi Stage 2 as part of our phased Wairākei replacement programme.

We purchase a wide variety of goods and services to help us maintain our power stations, support our customers, and run our offices. Our responsible procurement framework helps us identify and manage risks in our supply chain, including modern slavery, and allows us to work with suppliers to align their practices with our goals. Contact has over 2,600 suppliers, 86% of whom are based in New Zealand. Seven percent are based in Australia, and seven percent in other countries.

The goods and services we purchase include:

- + geothermal, hydro, and thermal power station supplies;
- + grid scale battery;
- + IT hardware and software;
- + vehicles;
- + safety equipment;
- + personal protective equipment/work wear;
- + metering field services;
- + facilities maintenance;
- + construction services, equipment and components;
- + gas, electricity, and broadband services; and
- + labour (construction and engineering).

As we progress our wind and solar generation initiatives we will also develop our supply chain in these markets.

Our workforce

Contact employs over 1,200 people based at 19 sites throughout New Zealand. While we have no overseas-based employees, from time to time our subsidiary Western deploys teams to deliver specialist well-cleaning services to domestic and international customers.

Please see our **FY25 Integrated Report** for more information about Contact's operations, and supply chain and workforce.



Policy framework and governance

Communicating our human rights expectations

We care deeply about the health, safety and wellbeing of our employees and expect all our people to act honestly, with integrity and in accordance with the law, all the time. This expectation is enshrined in our **Code of Conduct** which applies to everyone working for Contact, including our Board of Directors, and underpins our corporate policy framework. Contact has a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers. These are reviewed regularly.

Modern Slavery governance

Corporate governance at Contact is led by an independent, experienced Board which oversees core strategy and reviews key risks facing the business. Three Committees assist the Board in discharging its governance duties. The Audit and Risk Committee (ARC) ensures that management has established a risk management framework in line with the Board's expectations which includes policies and procedures to effectively identify, treat and monitor principal risks, and regular reporting to the ARC and Board.

At operational level our Modern Slavery Working Group, established in FY24, comprises representatives from key business areas (Renewable Growth, Solar, Wind and Battery, Procurement, People Experience, Legal and Risk) and functions as our 'eyes and ears' across the business and help drive a collective response. It convened four times during the reporting period to discuss Contact's modern slavery approach and address a range of initiatives. The Working Group reports to the Procurement Steering Group, which comprises Senior Leadership Team members and the Head of Strategic Procurement. This structure ensures oversight and input on significant modern slavery issues at senior management level.

Policy	Purpose	Training
Code of Conduct	Sets out our expectations for how our people (including contractors) behave towards each other, our partners and our community.	Mandatory for all employees, on a regular cycle.
Supplier Code of Conduct	Sets out our expectations of suppliers, including those relating to labour conditions and human rights.	The Supplier Code of Conduct is provided to all suppliers and referenced in standard contract templates.
Human Rights	Outlines our commitment to observing all human rights laws and to mitigate, identify and remediate modern slavery risks including to prohibit the use of all forms of forced and compulsory labour, all modern forms of slavery and any form of human trafficking in our operations and supply chain.	Our Code of Conduct compliance training for all employees includes human rights elements relating to bullying and harassment.
Health and Safety	Outlines our commitment to healthy and safe ways of working that protect our customers, team members and business partners.	Mandatory for all employees, on a regular cycle.
Whistleblowing	Sets out the processes for reporting suspected serious wrongdoing.	Component of regular Code of Conduct training.

Our **Corporate Governance Statement** outlines how our key policies operate, and the policies are on our **website**.

3. Risks of modern slavery practices in our operations and supply chain

We are committed to safe and effective work practices across our business and operate in a manner consistent with internationally recognised human rights as laid out in the International Bill of Rights, the International Labour Organisation’s Declaration on the Fundamental Principles and Rights at Work, and other established human rights principles and obligations.

To help us identify any risks across our business we:

- + conduct a Peakon employee engagement survey three times annually, helping to create a culture of continuous feedback.
- + operate a whistleblowing channel which allows our people to report human rights issues within the business, and allows us to monitor, review and address any issues raised.
- + encourage a culture of speaking up.

Operations

The risk of modern slavery occurring in our operations is low, as most of our people are employed directly (or are directly contracted) and are based in New Zealand. New Zealand is ranked low for the prevalence of, and vulnerability to, modern slavery on the Global Slavery Index.¹

Accordingly, our operational risk assessment focusses on areas of the business that use contracted or third-party labour providers. We have less direct visibility and control over these providers and their employment terms.

Contact’s subsidiary Western does some international work in countries which rank higher in the Global Slavery Index. In this context it is engaged as a consultant/supplier of specialist services for a project. While this can make it more challenging for Western to assess the extent to which local laws – including modern slavery laws – are being enforced, we expect our partners to meet the expectations set out in our Supplier Code of Conduct. This includes an expectation that working conditions are safe and that workers are treated in a responsible way, with respect and dignity. We continue to work with Western to raise awareness of modern slavery issues so that it can identify and potentially act on an issue where necessary.

Supply chain

We have not identified an instance of Contact causing or contributing to modern slavery, but we recognise that some of our goods and services are sourced from extensive and complex global supply chains which have been linked to forced labour, child labour and human trafficking at lower tiers. Our increased investment in new renewable generation projects, including the purchase of construction materials and machinery, has increased our exposure to some of these risk areas. We also purchase IT and telecommunications hardware, PPE and office supplies which are known to carry some risk.

We took a range of actions during FY25 to help us identify, manage and mitigate some of these risks. These actions were guided by recommendations resulting from an external review of our modern slavery approach conducted in FY24, and are detailed below.

Contact retained its membership of the Dow Jones Sustainability™ Asia Pacific Index (DJSI) for FY24. The DJSI tracks the performance of companies that lead in corporate economic, environmental and social issues in their respective sectors or geographies. Its evaluation includes a range of questions on supply chain management, supplier assessment, labour practices and human rights.

¹ See the [Walk Free Global Slavery Index](#).

Modern Slavery risk assessment

Our efforts during FY25 focussed on strengthening our procurement practices, engaging with suppliers, and targeting our due diligence by carrying out modern slavery 'deep dives' in key supply areas identified as potentially attracting higher risk.

Strengthening Procurement Programme

In November 2024 we launched our **Strengthening Procurement Programme**, designed to address critical gaps in Contact's approach to supplier management while driving better business outcomes.

An important driver for this Programme is the desire to be able to trace all the tools, systems, services and products in use across Contact back to an arrangement with a reputable supplier. This is a vital step towards us gaining the confidence that all our suppliers and contractors, and their corresponding supply chains, are not contributing to modern slavery or other unacceptable business practices.

Phase one of the Programme has transformed how Contact enters into new supplier agreements through holistic requirements assessment and centralised procurement decisions. It includes major improvements to the company's Contract Management System, ensuring streamlined processes and better support for managing supplier contracts. Phase two is a supplier lifecycle and performance system that will be implemented in FY26, which will improve our supplier transparency and engagement.

We require all new suppliers to complete a **Responsible Procurement Questionnaire and Declaration** in order to identify areas of concern and opportunity, and ways to work with them on continuous improvement. This includes questions about:

- + compliance with local human rights/modern slavery laws
- + whether they have a formal policy and commitment to monitor, address and annually report on all forms of modern slavery in their supply chain, including forced and child labour
- + if not, whether they have, or plan to implement, systems to identify, assess, manage, and mitigate modern slavery risks

We undertake other forms of due diligence, according to the project and supplier relationship in question. For example:

- + as part of engaging new suppliers for our wind farm project we will be conducting a **selection process** which includes assessment of modern slavery statements from suppliers and requests evidence of independent certification of supply chains. If required, for further verification, factory and site inspections at various stages of the supply chain will be performed.
- + during FY25 Contact has been using an information services platform to run checks against every new supplier name using the "**PEP, Sanctions and Adverse Media Services**" tool, as the first stage of collecting comprehensive supplier information. If a modern slavery (or other) issue is flagged in the system, secondary checks are conducted and the issue followed up with the supplier. We have not identified any modern slavery concerns with our new suppliers through this channel. In the second stage of collecting supplier information we will implement a tool which allows us to monitor all suppliers on an ongoing basis, and which will automatically notify us of any potential issues.

Modern Slavery Working Group

Representatives of our **Modern Slavery Working Group** were tasked with identifying and reporting on risks in their business areas, focusing attention on supply contracts where risks might arise. This has led to valuable conversations with suppliers about modern slavery and provided opportunities to inform and educate. Working Group members also helped to develop the KPIs; identified training opportunities for business groups; reviewed new standard contractual clauses; and identified the need for trusted and accessible reporting mechanisms for people to notify modern slavery concerns. This messaging was picked up in an initiative to evaluate and raise the profile of Contact's whistleblowing mechanism.

Building internal awareness

During the reporting period we:

- + delivered a modern slavery training session to a team of 72 people from our Finance and Risk teams
- + developed an online modern slavery module which has been completed by nearly 100 of our people.
- + presented Modern Slavery Working Group progress reports at each Procurement Steering Group meeting, ensuring that senior procurement decision-makers remained informed.

The four indicators and key risk areas identified in our desktop review are set out below:

Risk indicators



Vulnerable populations

Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. We recognise that the level of worker vulnerability, and risk of poor labour practices and exploitation are higher in contexts where base skill labour is relied upon.



High risk business models

Business models that rely on third parties for the provision of services (e.g. labour hire). Outsourcing reduces the visibility of third-party recruitment practices and provision of worker entitlements.



High risk industries

Products and services regarded as having more significant inherent modern slavery risk (e.g. solar panels).



High risk geographies

Countries or regions which are known to have higher human rights (and modern slavery) risks, including those vulnerable to bribery and corruption, or without strong labour laws and governance.

Key risk areas

Engagement of labour via third parties

Contact engages labour for major project sites via third parties. There is likely to be a high prevalence of migrant labour, particularly during periods of peak demand. Contact has less visibility and oversight of these workers, especially where sites are remote. The risks of forced labour and other modern slavery practices may be higher in these circumstances.



Joint ventures

Acquisitions, investments in, or partnerships with, other organisations can expose Contact to high-risk business models, vulnerable populations, or high-risk geographies.



Western offshore projects

Western operates in some regions at higher risk of modern slavery, though it does not have direct control or oversight of other workers when it provides specialist services.



Solar panel supply chain

The solar panel supply chain carries a high risk of modern slavery (and other human rights) abuses. 95% of solar panels worldwide are made up of polysilicon. Nearly half of global production comes from Xinjiang, where polysilicon is produced by Uyghurs and other minorities under conditions of forced labour.² All four of Xinjiang's polysilicon manufacturers have reported their participation in labour transfer programmes and/or are supplied raw materials to companies that have.









Wind supply chain

The growing demand for balsa wood used in wind turbines has resulted in the exploitation of workers in the balsa industry in Ecuador and the use of forced labour in the Amazon. Modern wind turbine designs are increasingly moving away from using balsa wood in the blades with alternative materials such as PET being used in their manufacture.

There are also modern slavery risks associated with the minerals used in wind turbine manufacture, including copper and manganese.



² US ITC Dataweb and UN Comtrade, 2020.

Battery supply chain	Grid-scale battery procurement is considered high-risk for modern slavery due to risks present throughout the supply chain. Key components such as lithium, cobalt may be sourced from regions associated with human rights abuses. Up to 30% of the cobalt used in lithium batteries (in which solar energy is stored) is sourced from mines in the Democratic Republic of the Congo – where forced and child labour is common.	 
Sourcing of electronic goods (e.g. laptops, mobiles)	Electronics manufacturing is a high-risk industry for modern slavery due to the typically low profit margins and tiered production system. The raw materials are often sourced from high-risk geographies, and manufacturing often takes place in less developed countries with minimal legal and regulatory protections.	 
Cleaning, Maintenance and Security Services	These categories of work can be high risk due to remote work locations, manual labour, on-demand work and reduced visibility of subcontracting arrangements.	 

4. Actions to address identified risks

We take a risk-based approach in prioritising the areas for further action. This section sets out our progress against the objectives in our FY25 Modern Slavery Statement and our plans for FY26. It includes additional initiatives undertaken in FY25.

Objectives	Activities	
Continue to embed our modern slavery approach across the business during and further integrate it with our suite of ESG strategies	FY25 <ul style="list-style-type: none"> Used Modern Slavery Working Group to gather information, identify and fulfil training needs, and improve and cement our modern slavery approach across the business by ensuring consistent application of procurement processes and strong supplier relationship management Agreed an escalation process for any modern slavery issues identified and set KPIs to track progress. 	FY26 <ul style="list-style-type: none"> Start a programme to remediate all existing contracts to ensure modern slavery and ESG obligations are included across our supply base (in addition to all new agreements) Continue to use the Working Group and governance process to identify risks and training opportunities, and to initiate modern slavery discussions with suppliers at early project stages Produce modern slavery information packs to share with suppliers.
Work closely with our project partners to ensure a robust approach to identifying, assessing and mitigating modern slavery risks	FY25 <ul style="list-style-type: none"> Carried out two extended supply chain reviews for product categories identified as having higher potential for worker exploitation Improved visibility by reaching deeper into these supply chains via tier 1 suppliers into tiers 2, 3 and beyond Began to strengthen key supplier relationships through a series of one-to-one discussions, including on modern slavery approaches. 	FY26 <ul style="list-style-type: none"> Work with suppliers and partners to encourage two-way dialogue on modern slavery and human rights risks, communicate our human rights due diligence expectations, share best practice and discuss opportunities for further supply chain transparency.
Our updated procurement system, once implemented, will strengthen our ability to screen suppliers and provide reassurance that they meet our expectations around Modern Slavery standards	FY25 <ul style="list-style-type: none"> Completed implementation of supplier onboarding and management process Completed a review of our contract templates and embedded ESG and modern slavery expectations Carried out two extended supply chain reviews for product categories identified as having higher potential for worker exploitation Incorporated modern slavery clauses in standard contract templates Ran each new supplier's name through Infolog (a multi-service Information Hub) to conduct adverse media, politically exposed persons and sanctions list checks. If a modern slavery (or other) issue is flagged in the system, secondary checks are conducted. (No modern slavery concerns yet identified) Began face-to-face discussions with existing suppliers to build closer relationships, including coverage of modern slavery approaches and seek to understand what steps suppliers are taking to tackle it. 	FY26 <ul style="list-style-type: none"> Operationalise Phase 2 of our Strengthening Procurement Programme, helping us effectively to centralise our supplier onboarding process and screening by maintaining accurate, up to date record of supplier data. We will also automate the collection of key compliance information and supplier performance metrics, replacing our existing manual processes with automated workflows and digital record maintenance to increase visibility of our supply base.

Objectives	Activities
Expand in-person modern slavery training to selected business units	<p>FY25</p> <ul style="list-style-type: none"> Identified additional business areas for targeted training Developed an online modern slavery training module available to all employees Delivered two modern slavery training sessions to external industry groups. <p>FY26</p> <ul style="list-style-type: none"> Continue to create bespoke training for higher-risk business groups, and to raise awareness of the online training module.
Raising profile of whistleblowing channels	<p>FY25</p> <ul style="list-style-type: none"> Reviewed employee usage of whistleblowing mechanism Raised awareness of the mechanism with reminders to all employees and training components in 'new employee' and 'new leader' onboarding sessions. <p>FY26</p> <ul style="list-style-type: none"> Maintain regular cycle of business-wide communications and onboarding training to raise awareness of the whistleblowing mechanism Make the mechanism publicly available, to allow third parties to raise serious concerns, including about modern slavery and human rights.

Additional FY25 activities

Supplier deep dives

We continued to focus on our higher risk areas with “**deep dives**” into two areas of our supply chain: promotional items and electrical transformers. In our first deep dive we:

- + identified **promotional items** as a risk area based on geographic and vulnerable population links.
- + conducted desktop reviews for our two key suppliers of promotional items.
- + engaged in person to ask a range of questions about their approach to modern slavery risks, internal policies and processes, and understanding of their own supply chain.
- + satisfied ourselves that both suppliers demonstrated robust approaches to modern slavery, were alive to potential risks in their own supply chains and were committed to raising awareness of the issue.

In our second deep dive we:

- + identified **electrical transformers** as a risk area due to the potential for forced labour, child labour, and other exploitative practices in the sourcing of raw materials or during the manufacturing process.

- + engaged directly with our key supplier of electrical transformers.
- + learned that the supplier has a manufacturing site in Indonesia where high labour standards are observed, and a highly paid and skilled labour force employed. The supplier conducts regular site visits and factory audits and speaks directly to employees about their roles.
- + agreed to continue working with the supplier to share insights into our modern slavery approach.

In addition, following our “deep dive” into labour hire practices at our Wairākei geothermal plant in FY24 we ran “due diligence plus” remediation reports for ten of those suppliers. using a third-party service. These covered a range of issues including human rights, modern slavery and trafficking. No modern slavery concerns were identified.

Kōwhai Park joint venture modern slavery review

We work closely and proactively with our joint venture partners to identify and address modern slavery risks in our supply chains for renewable electricity generation.

During the development phase of our Kōwhai Park Solar Farm project in FY25 our JV partner initiated an assessment of the underlying supply chain for the solar modules, identifying the downstream suppliers of module components down to the polysilicon level (tier-5). They discovered that the two wafer and cell suppliers for our solar panels had been added to the United States Government’s UFLPA Entity List.

The basis was “reasonable cause to believe [that they] source polysilicon from the Xinjiang Uyghur Autonomous Region”. Our JV partner had already identified the source of polysilicon for the Kōwhai Park solar modules during the due diligence process, and confirmed that none of the polysilicon in those modules originated in the XUAR. Nevertheless, they took a cautious approach: the wafer and cell suppliers were substituted out of the supply chain for Kōwhai Park and replaced with suppliers who have a clean Achilles ESG audit.

5. Effectiveness of our Actions

We recognise that the effort to identify and address modern slavery risks throughout our supply chain is a continuous and evolving process. We believe that the steps we have taken during FY25 to review and improve our actions have significantly strengthened our approach, as follows:

- + Improvements to our procurement process, strengthening of our contract templates and regular supplier screening provided better understanding and oversight of the risks in our supply chain.
- + Our two 'deep dives' into suppliers' approaches to modern slavery and insights into their own supply chains have illuminated areas identified as higher-risk, and while no specific risks were identified, the initiative provided opportunities to deepen relationships with these suppliers and (in one case) to share information and capability on an ongoing basis.
- + The delivery of training to key business teams as well as to external industry groups has helped to raise awareness of modern slavery and generated further interest in best practice in this area.
- + A successful series of Modern Slavery Working Group and Procurement Steering Group meetings has given us "eyes and ears" across the business, and an agreed process for review and escalation of modern slavery issues.

- + The new Procurement processes have set us up for better oversight of, and relationships with, our suppliers.

Ongoing assessment

We will assess the effectiveness of our modern slavery risk management in accordance with our Corporate Governance framework, on an ongoing basis. The framework provides an informed and independent view of whether risk-based controls are in place and working as intended. As noted earlier, we are aware that these efforts are necessary but not sufficient to uncover and address all potential modern slavery risks across complex global energy sector supply chains. We anticipate that our planned focus – including on closer supplier relationships, greater supply chain monitoring and regular 'deep dive' investigations – will raise transparency levels and increase the likelihood of us uncovering potential modern slavery issues.

We identified a set of quantitative key performance indicators during FY25 to help us track and improve our efforts to identify and address our modern slavery risks over time. These will be a valuable tool in assessing our approach.



FY25 KPIs

Priority area	What we measure	Target	FY25 outcomes
Training and raising awareness	Online training completed	80	169
	Targeted training sessions for business units	5	2
	Reports received on modern slavery issues	1–5	0
Due diligence/ Supplier monitoring	Percentage of new suppliers screened	100	100
	Deep dive modern slavery internal audits	2	2
Remediation	Follow-up engagements with suppliers	1–5	3
Governance and oversight	Working Group meetings conducted	4–6	4
	Contract templates updated with new Supplier Code of Conduct/ Modern Slavery clause	5	22

Manawa Energy acquisition

Following Commerce Commission approval in early May 2025 and a shareholder vote in favour, Contact completed a deal to acquire Manawa Energy (Manawa) on 11 July.

Manawa is a major player in the renewable energy sector with 220 employees and 25 hydro schemes across New Zealand. The company also has several new large-scale wind and solar projects in the pipeline.

In FY24, Manawa Energy undertook its first materiality assessment which identified having an ethical supply chain as one of the company’s material ESG issues. Manawa’s operations and supply chain will be included in Contact’s modern slavery reporting from FY26 onward.



6. Consultation and Approval Process

During the reporting period, various teams in the Contact group have consulted around modern slavery risks and processes to address them. This Statement has been reviewed by representatives from each of:

- + Western and Contact Energy Solar Ltd
- + The Modern Slavery Working Group and Procurement Steering Group
- + Contact's Commercial and Procurement Specialists
- + Business unit representatives with oversight of suppliers and subsidiaries assessed as potentially more exposed to risks of Modern Slavery practices
- + Senior managers from the Legal, Commercial, Risk & Assurance and Procurement teams
- + Contact's Senior Leadership Team.

This Statement was approved by the Board on 15 August 2025.



Robert McDonald

Board Chair
Contact Energy Limited



Mike Fuge
Chief Executive Officer
Contact Energy Limited