

Modern Slavery Policy



Policy statement

Jacana Energy is committed to operating ethically. Jacana Energy has developed this policy to demonstrate its compliance with the *Modern Slavery Act (Cth)* (the Act).

With an annual consolidated revenue over \$100 million, Jacana Energy is obligated to comply with the Act and as such, must submit an annual Modern Slavery Statement to the Australian Border Force by 31 December of each year.

Objective

The objective of this policy is to:

- demonstrate Jacana Energy's compliance and support for the Act;
- demonstrate Jacana Energy's commitment to only engage with businesses that comply with the Act, and
- mitigate the potential for modern slavery practices to exist within Jacana Energy, including recruitment of staff; procurement; and supply chain practices.

This policy is published on the Jacana Energy website.

Principles

Jacana Energy expects its suppliers to provide goods and services in a manner consistent with ethical human rights practices.

This policy has been developed to ensure Jacana Energy's compliance with the Act. Compliance is achieved by:

- appropriate procurement of goods and services, and effective contract management monitoring of key suppliers; and
- lodgment of the annual Modern Slavery Statement with the Australian Border Force by 31 December of each year.

Procurement and Contract Management

During the procurement and contract management life cycle Jacana Energy will take all reasonable steps to ensure that suppliers only source goods and services from entities that comply with the obligations of the Act.

Annual Modern Slavery Statement

Jacana Energy will compile all necessary data to prepare the annual Modern Slavery Statement and submit the statement to Australian Border Force prior to December 31 each year.

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Non-Compliance

Non-compliance with the Act may result in Minister intervention and publication of non-compliance on the public non-compliance register.

Scope and application

The policy applies to:

- all employees, contractors, consultants and any other individual or groups undertaking activities for or on behalf of Jacana Energy (**Workplace Participants**).

Responsibilities

Board of Directors:

- approval of this policy, and
- approval of the annual Modern Slavery Statement to be completed in accordance with the Act.

Audit and Risk Committee:

- endorsement of the annual Modern Slavery Statement; and
- monitoring compliance performance by receiving reports on non-compliance failures, including corrective actions.

Chief Executive Officer:

- ensuring adequate procedures are in place to ensure this policy is effectively managed, and
- accountable for allocating sufficient resources to implement the policy and its relevant procedures.

Workplace Participants must:

- adhere to the obligations under this policy that are relevant to their positions and duties;
- integrate compliance obligations into policies, procedures and processes, relevant to their positions and duties;
- participate in relevant training to ensure compliance with this policy;
- identify and report compliance concerns and compliance failures; and
- share opportunities to improve Jacana Energy's modern slavery practices.

Definitions

Modern Slavery Statement as defined by the Act, from time to time.

DOCUMENT INFORMATION	
Classification:	Legal and Governance
Version:	1.0
Document reference:	JED2021/18829
Responsible Officer:	General Counsel and Company Secretary
Approved by:	Board of Directors
Effective:	22 February 2022
Review date:	21 February 2025
RELATED LEGISLATION AND ACTS	
Related Legislation	
Modern Slavery Act 2018	Modern Slavery Act 2018 (legislation.gov.au)
Northern Territory Government Buy local plan	Buy Local Plan - NT.GOV.AU
Related documents	
Description	TRM or Website Ref
Template Annual Modern Slavery Statement	JED2021/18830
Procurement Policy	JED2020/6008
Contract Management Procedure	JED2021/3783
Compliance Management Framework	JED2018/78365
Compliance Policy	JED2018/72466
Risk Management Framework	JED2018/73859
Supporting aids	
Australian Border Force - Online Register (how to submit a statement)	Modern Slavery Statements Register (modernslaveryregister.gov.au)

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DOCUMENT HISTORY			
Version	Effective	Change Description	Approved by
1.0	22 February 22	Initial Version	Board of Directors