

REnew Pacific's commitment to preventing modern slavery

1 About REnew Pacific's commitments

The REnew Pacific program is delivered by the Australian Government's [Australian Infrastructure Financing Facility for the Pacific](#) (AIFFP). REnew Pacific is implemented by [Palladium](#). As such, the program is within the scope of the [Commonwealth Modern Slavery Statement 2024-25](#) and Palladium's [Modern Slavery Statement](#).

This document sets out REnew Pacific's approach to identifying and managing modern slavery risk across the program's activities, partners and supply chains. It is structured around the mandatory reporting criteria at section 16 of the Modern Slavery Act 2018 (Cth) as a matter of good practice, and to support consistency with Palladium's statutory reporting.¹

2 Structure, operations and supply chains

REnew Pacific's activities are focused on providing grants to develop off-grid renewable energy projects, leveraging co-financing and partnering with non-government organisations, the private sector, investors, community organisations and government agencies. Grantees procure the components required for off-grid renewable energy projects. Components including solar PV modules and battery systems are procured through local partners across the Pacific as well as suppliers located in Australia and globally.

REnew Pacific is committed to identifying, managing and reducing modern slavery risks across all aspects of our work. We take reasonable steps to understand where risks may exist in our operations and supply chains and to ensure our partners do the same. Our approach applies to all contracted personnel, contractors, subcontractors, grantees, subgrantees, non-government organisations (NGOs), other implementing and downstream partners in Australia and across all countries where we operate.

3 Modern slavery risks

Greater utilisation of renewable energy and more advanced renewable energy technologies are central requirements for decarbonising global energy systems. With governments and investors around the world scaling up efforts to address climate change, the uptake of renewable energy is expected to rapidly accelerate.

However, there are significant modern slavery risks in the global supply chain for renewable energy components. In particular, solar PV and battery supply chains with exposure to modern slavery risk and forced labour can cause significant harm to people and a reputational risk for REnew Pacific. The program has identified this as an area of salient risk to people based on the scale, scope and irremediability of the harm and prioritises taking reasonable steps to manage this risk.

¹ This is not a modern slavery statement. Under the meaning of the Modern Slavery Act 2018 (Cth) REnew Pacific is considered to be a 'program' and not a 'reporting entity'.

We understand that there are other modern slavery risks across the value chain that we continue to monitor.

4 Actions taken to assess and address risks

REnew Pacific has developed a Modern Slavery Risk Management Plan which sets out how the risk of modern slavery is identified, assessed and addressed in the delivery of REnew Pacific projects. REnew Pacific considers supplier information as part of the grant assessment process. This enables us to understand potential modern slavery risks and ensure responsible renewable energy procurement.

4.1 Supplier risk assessment process

REnew Pacific conducts a comprehensive modern slavery risk assessment of all solar and battery suppliers to projects. The assessment evaluates inherent risks and assesses supplier controls.

The inherent modern slavery risk level is determined based on the salient risk exposure involved in the acquisition of a particular product category, in the absence of risk controls or effective risk mitigation. We consider factors associated with the production, distribution or use of raw materials or specific products, including the complex and opaque nature of renewable energy supply chains, the regulatory context, and any credible evidence that suppliers operate in or source from areas with high modern slavery risks.

We then assess supplier controls in place to mitigate the inherent risk. In FY 2025-26, we introduced a requirement for all grantee suppliers of solar equipment to complete a Modern Slavery Due Diligence Checklist to determine if they are taking reasonable steps to manage modern slavery risks.

4.2 What strong supplier practices look like

To demonstrate strong modern slavery risk management, suppliers will be asked to provide:

- Clear supply chain visibility where possible, including sourcing of key resources (e.g., polysilicon, battery minerals)
- Adequate policies and due diligence processes, including human rights or modern slavery policies, supplier codes of conduct, grievance mechanisms, and public reporting (e.g., sustainability reports, modern slavery statements).
- Evidence and results of independent verification: audit results, certifications (e.g., Solar Stewardship Initiative certified sites, EcoVadis Medal), and participation in responsible industry initiatives and/or memberships (e.g., UN Global Compact, Responsible Business Alliance, Solar Stewardship Initiative, Global Battery Alliance).

We request that grantees select the lowest possible risk suppliers available to the relevant project. If we have concerns about the ability of a proposed supplier to effectively manage modern slavery risks, we will require grantees to identify alternative suppliers where possible. Where a supplier is not selected for a specific project, this does not affect a supplier's eligibility for other REnew Pacific projects or other programs funded by Australia's Department of Foreign Affairs and Trade.

4.3 Ongoing monitoring

If REnew Pacific determines that a supplier is suitable for a project, additional risk mitigation steps will be required as part of ongoing monitoring. This may include:

- Modern slavery clauses or obligations in grant agreements
- Mandatory onboarding training
- Strengthening supplier policies or risk management practices.

These steps help ensure ongoing, responsible management of modern slavery risks throughout project delivery.

REnew Pacific conducts a biannual supplier screening to determine if any changes have occurred in relation to each supplier's modern slavery risk level. Where a supplier's risk level increases and is considered not tolerable, REnew Pacific will request that partners seek alternative suppliers for all future procurement where feasible and discontinue sourcing from that supplier. Where needed, we will take steps to address this change through our Modern Slavery Response Plan.

REnew Pacific has delivered in-person and online training on modern slavery delivered by an expert to key internal teams.

4.4 How we respond to an alleged modern slavery incident

REnew Pacific has developed a Modern Slavery Response Plan, which sets out how we will respond to an alleged incident of modern slavery in our supply chain. A potential incident may be identified in a variety of ways, including:

- **Annual supplier screening:** REnew Pacific conducts an annual supplier risk screening to determine if any changes have occurred in relation to each supplier's modern slavery risk level.
- **Grievance channels:** As part of our Environmental and Social Safeguards Framework, the REnew Pacific program has a comprehensive approach responding to social safeguarding grievances. Modern slavery-related grievances can be reported through the [Palladium Integrity Hotline](#). DFAT also requires immediate reporting of any suspected or alleged instances of child labour, child abuse, exploitation, harm, or non-compliance with child protection policies to the Conduct and Ethics Unit via childwelfare@dfat.gov.au.

5 Assessing effectiveness

The REnew Pacific Program assesses the effectiveness of its actions to deal with modern slavery risks in accordance with Palladium's approach as described in the [Palladium Australian Modern Slavery Statement 2025](#).

6 Consultation

This statement has been compiled in consultation and collaboration with representatives of Palladium's Asia Pacific Safeguarding Team and AIFFP.

7 Future commitments

Future commitments may include:

- Development of KPIs to measure the effectiveness of actions taken to manage modern slavery risks
- Building the capacity of partners to effectively manage modern slavery risks through dedicated training during onboarding and periodically throughout the project lifecycle
- Dissemination of a training feedback survey for internal stakeholders to monitor the effectiveness of training undertaken
- Ongoing review of renewable energy supply chain risks.