

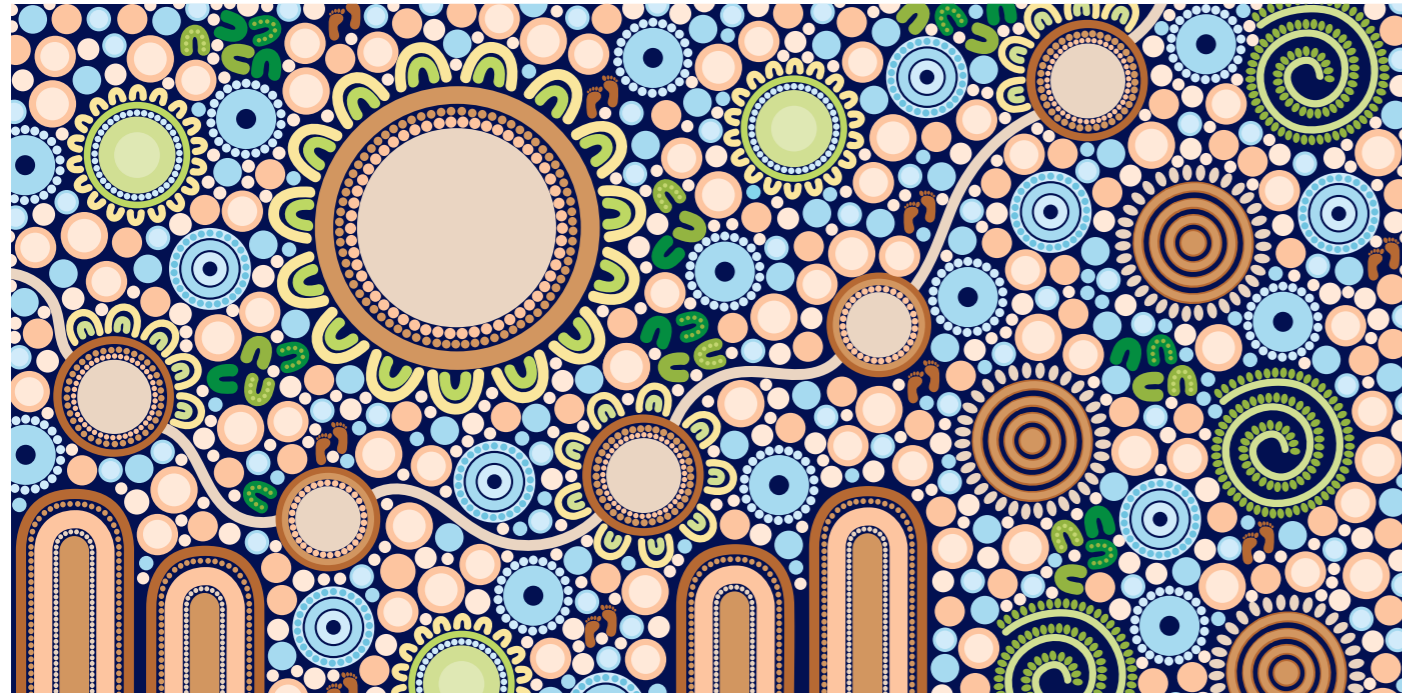
FY2024

Sustainability Report



Acknowledgment of Country

Squadron Energy acknowledges the Traditional Custodians of the Lands and Waters where we work and live. We pay our respects to Elders past and present, and acknowledge their ongoing cultural and spiritual connection to Country.



Artwork by Keira-Leigh Newman, 2024

CONFIDENTIALITY

Information in this report may not be reproduced or provided in any manner to any third party without the consent of Squadron Energy Services Pty Ltd.

© Copyright Squadron Energy Services 2024. This work and the information contained in it are the copyright of Squadron Energy Services Pty Ltd.

DISCLAIMER

This 2024 Sustainability Report is provided for general information only. The intention is to communicate environmental, social and governance goals, impacts and progress. All content and data include in this report was accurate at the time of publishing (October 2024).

Contents

00	Foreword	-----	6
01	Squadron Energy	-----	10
	About Squadron Energy	-----	12
02	Sustainability at Squadron	-----	14
	Our Sustainable Business Framework	-----	16
03	Developing Communities	-----	18
	Community benefit sharing and social initiatives	-----	20
	Regional economic development	-----	21
	Local employment	-----	23

Contents

04	Generation Resilience	-----	26	06	People Engagement	-----	52
	Development pipeline	-----	28		Health, Safety and Wellbeing	-----	54
	Supply reliability	-----	30		Employee engagement	-----	56
	Access to capital	-----	31		Diversity, equity, inclusion	-----	60
	Advocacy and engagement	-----	32	07	Business Integrity	-----	64
05	Working Responsibly	-----	34		Business conduct	-----	66
	Ecological impacts	-----	36		Risk management	-----	69
	Environmental stewardship	-----	43		Regulatory compliance	-----	71
	Community impacts	-----	46		Ethical supply chains	-----	74
	Cultural heritage	-----	48				

Foreword

Sustainability means more than just meeting today's needs - it's about shaping a resilient and thriving future for both people and the planet. As we navigate Australia's energy transition, the urgency of our purpose has never been clearer. We are proud to present Squadron Energy's Sustainability Report for the 2024 financial year, highlighting our progress against our new Sustainability Framework.

Our purpose is to improve the environment for current and future generations by leading Australia's transition to renewable energy. Our vision is to become Australia's leading renewable energy company.

Despite challenges like rising construction and financing costs, complex regulatory approvals, and a shifting political landscape, we remain focused on creating sustainable value and driving change. We aim to do this by reducing costs, enhancing energy output, engaging deeply with communities to share benefits, improving project quality, and accelerating delivery.

Sustainability for us means making a positive impact across our operations and value chain - benefitting the planet, our people, and the communities we serve. Through this we aim to demonstrate the far-reaching benefits of renewable energy for all Australians.

In this report, we outline our five Sustainability Pillars— Developing Communities, Generation Resilience,

Working Responsibly, People Engagement, and Business Integrity. These pillars guide our commitment to achieving both financial and operational excellence, while maintaining the highest standards of community engagement, safety and environmental stewardship.

Among the progress we've made against our five sustainability pillars over the last year, we're particularly proud of the positive impact we're making in the local communities where we work.

Developing Communities

We continue to make a positive impact in the local communities where we operate:

- Developing wireless, high-speed internet access in the Central West Orana Region of New South Wales through the *Squadron Link* project.
- Contributing over \$1 million to community benefit funds and sponsorships across Victoria, NSW and Queensland.
- Partnering with Dubbo Regional Council to invest in its *Advanced Wastewater Treatment Facility* to filter sewage water for renewable projects, strengthening the region's drought resilience (pending approvals in 2025).

Generation Resilience

Our projects are designed to strengthen Australia's renewable energy capacity and support the country's emissions reduction targets:

- Completing critical pre-construction work for the Uungula Wind Farm near Wellington, NSW, including safety upgrades to Twelve Mile Road and the Goolma Road intersection, benefitting the local community and facilitating the delivery of construction materials.
- Managing risks that could impact the generation and supply of electricity, including cyber security and security of critical infrastructure, through our compliance with the Australian Energy Sector Cyber Security Framework.

People Engagement

We have committed to supporting people in the regional communities in which we operate by:

- Providing two wind turbine technician traineeships to First Nations professionals through ARC Wind in Wellington, supporting future employment opportunities.
- Establishing offices in Dubbo and Wellington, that now employ 11 local Squadron employees.
- Creating more than 110 local jobs within the first six months of construction of our Uungula Wind Farm.

Working Responsibly

While we have made significant progress in minimising environmental impact, we've also faced challenges in our health and safety performance:

- As two wind farms moved into construction, the increase in high-risk hours worked led to a rise in our Total Recordable Injury Frequency Rate (TRIFR) from 7.64 to 10.44 over the past 12 months, where our employee TRIFR was 2.06 and contractor TRIFR was 13.29.
- We acknowledge that this safety performance does not meet our expectations. That is why we are developing and implementing an updated HSE management system and safety leadership program, to reduce injuries and improve accountabilities for HSE performance.
- In developing the Spicers Creek Wind Farm in the Central Orana REZ, 82 per cent of the proposed development footprint has been carefully placed on previously cleared land, at lower elevations, or in areas with less biodiversity.

Foreword

Business Integrity

Our commitment to integrity, which is one of our core values, guides our approach to sustainability. We continue to uphold strong governance practices across our operations, ensuring accountability and transparency in delivering our sustainability goals.

- Established a Health Safety Environment Sustainability Board Committee and an Audit Risk and Compliance Board Committee, setting a tone of commitment to business integrity from the top.
- Our approach to integrity is supported by 12 robust policies and procedures including our Anti-Bribery and Corruption and Money Laundering Policy, our Conflicts of Interest Policy and a Modern Slavery Policy.
- Clear, accessible channels for complaints and dispute resolution, and an independent Whistleblower Hotline for internal and external stakeholders.

The actions we take today will help shape the quality of life for future generations, preserve the environment, and influence the economic conditions of tomorrow. This report reflects our journey and steadfast commitment to building a better world through our sustainability efforts.

Looking ahead, we recognise there is more to accomplish. In FY25, we will refine our sustainability reporting indicators to more closely align with our strategic objectives, ensuring we remain on track to deliver our key goals. We will continue engaging with stakeholders to maximise benefits for generations to come.

Thank you for joining us on this journey.



Jason Willoughby

Chairman
Squadron Energy



Rob Wheals

Chief Executive Officer
Squadron Energy



Image: Clarke Creek Wind Farm



01

Squadron Energy

Squadron Energy (Squadron) is Australia's leading renewable energy company that develops, owns and operates renewable energy assets in Australia.

Image: Sapphire Wind Farm



About Squadron Energy

We are 100 percent Australian owned and with 1.1 gigawatts (GW) of renewable energy in operation and 900 MW under construction, we are the largest renewable energy developer in Australia.

Squadron is working to be the biggest single contributor to helping Australia meet its 2030 target of 82 per cent renewable energy.

With proven experience and expertise across the project lifecycle, we work with local communities and our corporate and industrial customers to lead the transition to Australia's clean energy future. To date, we have created 2,100 direct jobs and injected \$350 million into regional economies.

We are also developing a critical liquified natural gas import terminal to provide the gas required to firm renewable energy. During FY24, our wind farms generated enough electricity to power the equivalent of 490,000 Australian homes and avoided more than 1.8 million tonnes of greenhouse gas emissions.

Through power purchase and other offtake agreements we help corporate and government customers achieve their sustainability and net zero emissions goals.



Our values drive everything that we do

Humility

Frugality

Courage and Determination

Generating Ideas

Empowerment

Integrity

Enthusiasm

Safety

Family

Stretch Targets



02

Sustainability at Squadron

Our sustainability framework enables us to consider the broader and lasting impacts of our decisions, to focus on value creation and leaving a positive legacy.



Squadron’s Sustainable Business Framework

Our business value drivers



Squadron’s purpose is to improve the environment for current and future generations, by leading Australia’s transition to renewable energy. Our sustainability framework enables us to consider the broader and lasting impacts of our decisions, focus on value creation and leave a positive legacy.

The decisions we make impact our communities, our customers, our planet and our people. Our sustainability framework guides our decision making by ensuring we remember the critical role that all aspects of our business play in earning Squadron’s right to operate, which is essential for us to execute on our strategy.



03

Developing Communities

Strong relationships with local communities are essential for the success of our projects. We work closely with these communities to understand their priorities and identify ways we can share the value we create.

By minimising our impacts and delivering lasting benefits, we help create economic, employment and training opportunities in the regions where we operate.



Community benefit sharing and social initiatives

Our approach to community engagement is genuine and designed to last. Since we own our projects from development through to operations, we gain unique experience and build deep respect for people, communities and the environment.

Squadron is committed to ensuring a positive impact from our projects on local communities over the long term. We do this through opportunities such as co-investment, agreements with local councils, community sponsorships and grant initiatives, and other regional development initiatives (details below). Recognising that every community is different, we work with councils, local groups and residents to tailor benefits to make a lasting, positive impact.

Each project includes a community sponsorship program that provides funds or in-kind support to local initiatives, groups and events. These programs run throughout the project's lifecycle, often spanning decades in the case of wind farms.

We also enter into planning agreements with local councils to help fund public infrastructure, services, and amenities that benefit the community. In FY24, we contributed more than \$1 million to local communities through community benefit funds and sponsorships.

Key areas of investment included:

- Health and wellbeing
- Legacy infrastructure
- Schools & education
- Community connectivity
- Environment & resilience.

Squadron is also a signatory to the Clean Energy Council's Community Engagement Best Practice Charter for Renewable Energy Developments. This voluntary commitment ensures we uphold best practice in community engagement during the development and operation of our projects.

We work respectfully with each community, prioritising their local environmental and cultural values.



Regional economic development

We believe regional communities should be at the heart of our commitment to the renewable energy transition. Beyond our financial commitment, we also commit time and resources to the local communities where we work.

During FY24, our focus was on the Central West Orana (CWO) Renewable Energy Zone (REZ), which includes:

- Ungula Wind Farm (under construction)
- Spicers Creek Wind Farm (in development)
- Dubbo Firing Power Station (in development).

Squadron has personnel dedicated to Regional Economic Development and First Nations engagement with staff based in our Dubbo and Wellington offices. They work with local businesses, training and employment services, government agencies, First Nations groups and community leaders. Learn more about our approach to First Nations engagement in the [Cultural Heritage](#) section of this report.

Examples from FY24 include:

Squadron Link

Many rural landowners lack reliable mobile and internet access, so we are working on a fixed wireless internet service, which we call Squadron Link.

This service is initially aiming to provide a broadband internet service up to a 20km radius from the centre of Ungula Wind Farm, so that local landowners have internet access for essential services like telehealth, work-from-home capabilities, online education, and agricultural technology (Agtech) solutions.



Image: Squadron Link relay station

Workforce accommodation and legacy infrastructure

The demand for rental housing in the CWO REZ is high and temporary worker accommodation is limited. That’s why we are leasing land on the outskirts of Dubbo, NSW for worker accommodation. This will reduce

pressure on the local rental market during construction of Uungula Wind Farm, so that the local community benefits from both short-term economic activity and long-term infrastructure that reduces housing stress.

Recycled Water Agreement with Dubbo Regional Council

The CWO Region has faced significant recurring droughts, putting pressure on water resources and forcing communities to limit water use at home and in public spaces. To address this, we have partnered with Dubbo Regional Council to improve filtration at the local sewerage treatment plant, enabling a 19-kilometer pipeline built in 2021 to supply recycled water. An intended benefit of this project is to help preserve groundwater for use at home, while providing water for maintaining amenities like parks and public green spaces, ensuring they thrive even during periods of drought.



Image: (back) Dubbo Regional Council CEO Murray Wood, DRC Water and Sewer Client Services Officer Bina Mahadeb, DRC Infrastructure Director Luke Ryan, DRC Manager Strategy Water Supply and Sewer Chris Godfrey, Squadron Energy CEO Rob Wheals, Squadron Energy Regional Economic Development Facilitator Bart Sykes, (front) Squadron Energy Chairman Jason Willoughby and Dubbo Regional Council Mayor Mathew Dickerson.

Local employment

In FY24, we engaged the Regional Australia Institute to study the social and economic impacts of the renewable energy transition through to 2030. Their research showed that renewable energy projects will create 6,400 fulltime jobs across Australia by 2030, primarily in the construction, engineering and professional design industries. Another 7,600 jobs were forecast in industries such as transport and manufacturing. The growth in local population and employment is also expected to create another 5,700 jobs through increased regional consumption, leading to a net gain of almost 20,000 jobs.

We see Renewable Energy Zones as an opportunity to reverse the trend of local talent moving to coastal cities. By investing in local employment opportunities, we aim to create careers for both blue and white-collar workers in these zones. Importantly, it’s an opportunity for our future country generations to remain and thrive in the regions.

Our investment in regional and local jobs

During the construction phase of our five now-operational wind farms, more than 1,000 jobs were created, of which 599 jobs were provided to local contractors – accounting for more than half of all construction jobs.

Key examples of our FY24 job creation efforts include:



Offices in Dubbo and Wellington , NSW

We maintain a permanent long-term presence in the CWO REZ, employing 11 local staff across these two offices. This supports our engagement with local businesses and the broader community.



Image: Wellington trainee, Rikki Kent

First Nations traineeships

In partnership with Aurora ARC Wind, we offer training for First Nations peoples in the renewable energy sector. These roles provide valuable skills for both construction and operations, offering long-term career opportunities.

“I’ve already recommended it to two of my close friends. There’s a lot of physical activity, and you’re not doing the same thing every day. The variety keeps it really interesting! I’m now considering a sparky apprenticeship in the wind farm or continuing in service.” - Wellington trainee Rikki Kent.

Renewable Energy Awareness and Career Training (REACT)

We are working with Dubbo Regional Council and industry partners to scope a dual-use training and tourism facility that will help build local capacity while educating visitors

on renewable energy, and inspiring future generations to pursue career opportunities in our sector.

TAFE Micro-credentialling

We collaborated with TAFE NSW to create a digital Microskill course on the wind energy industry, providing a pathway for upskilling into renewable energy careers. Read more about this collaboration on the [TAFE NSW website](#).

Spicers Creek Wind Farm Awareness and Business Capability Uplift

We’re investing \$100,000 in a program that helps local and First Nations businesses prepare to compete for work on Spicers Creek Wind Farm. This includes tailored support, such as mentoring and contract management assistance.





04

Generation Resilience

Our technical capabilities, ability to access capital, and operational experience are core to maintaining and realising our development pipeline. By delivering projects we will continue to demonstrate the capability and potential for renewables to produce affordable, reliable and low emissions energy.



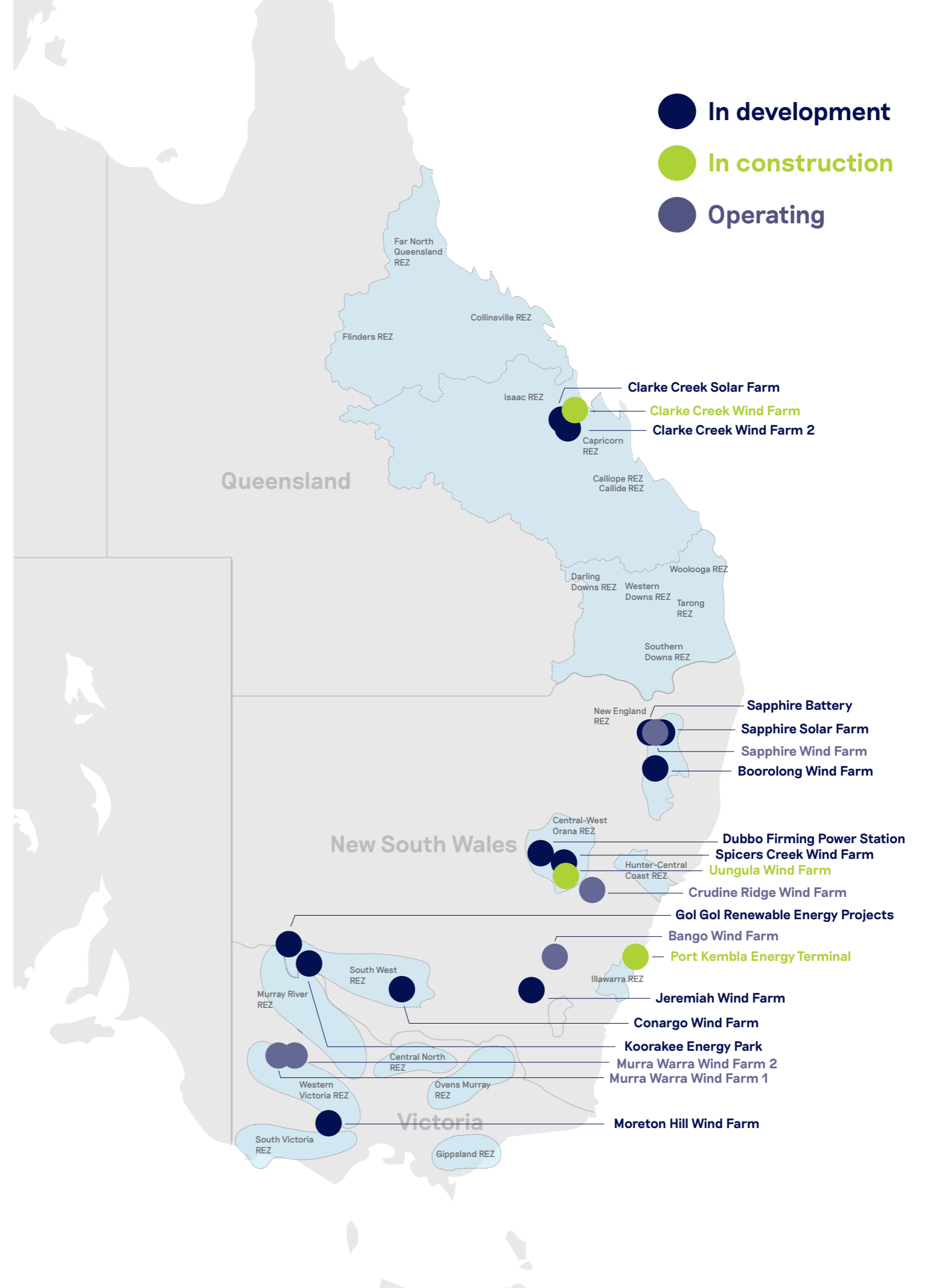
Image: Bango Wind Farm

Development pipeline

Squadron maintains and develops a large and diverse pipeline of renewable energy and firming projects at all stages of development.

At the end of FY24, we have 1.1GW of operating assets generating clean electricity, and 900MW under construction.

Squadron's development processes place particular focus on managing and mitigating environmental and social impacts. Learn more about this approach in the [Biodiversity](#) and [Community](#) sections of this report.



Supply reliability

Managing risks that could impact the generation and supply of electricity, including cyber security and security of critical infrastructure, is materially important to Squadron delivering on its purpose.

Squadron's five operating windfarms are defined as critical infrastructure assets under the *Security of Critical Infrastructure Act 2018* (Cth). Squadron has developed a comprehensive Critical Infrastructure Risk Management Program (CIRMP) that aligns with our risk framework.

The CIRMP defines the roles and responsibilities and the steps undertaken for identification and management of material risks associated with four defined hazard categories:

- cyber and information security
- personnel
- physical security and natural hazards, and
- supply chain hazards.

Operational risks, including those that relate to our CIRMP, are reviewed as part of the regular management of our assets.



Image: Sapphire Wind Farm

Access to capital

Squadron Energy is focused on enabling rapid decarbonisation by investing in renewable generation and firming assets.

We are committed to ensuring that sustainability-related risks that could affect our ability to access capital are managed and sustainability-related opportunities that could improve our access to capital are pursued.

Squadron companies¹ have agreed with their financiers a Green Financing Framework (Framework), which articulates how we intend to use our green loans to finance and/or refinance the applicable projects.

The Framework has been developed in line with the Green Loan Principles, a set of voluntary recommended guidelines used in green loans globally and defined by the Asia Pacific Loan Market Association, Loan Market Association, and Loan Syndications and Trading Association updated in February 2023.

The Framework is structured according to four key pillars:

1. Use of proceeds
2. Process for project evaluation and selection
3. Management of proceeds
4. Reporting.

To mitigate emerging risks, Squadron reviews the Framework's alignment to updated versions of the Green Loan Principles, as well as any regulatory or legislative developments which may impact the Framework.

Our commitment to sustainability, social licence and prudent governance as set out in our [Sustainability Framework](#) puts us in a strong position to advance our objective to lead Australia's transition to renewable energy.

¹ Squadron Breeze FinCo Pty Ltd; Squadron Breeze HoldCo Pty Ltd; Squadron Murra Warra 1 Pty Ltd; Squadron Murra Warra 2 Pty Ltd; Squadron Grassroots Pty Ltd



Image: Bango Wind Farm

Advocacy and engagement

We're committed to aiding policy makers to help shape and guide an efficient, effective transition to renewable energy and lifting industry standards.

We value public consultation highly and our engagement with policy makers is intended to promote transparency and support the best outcomes for Australian communities now and in future. Key areas of focus of our public consultations have been:

- Renewable Energy Zone scheme design and access framework
- associated community benefit requirements
- ensuring adequate environmental and planning controls for renewable energy projects
- pathways to support investment certainty and accelerate decarbonisation.

During FY24 we made multiple submissions to Government bodies and participated in more than 45 industry working groups, workshops and consultation events. For further details on our submissions, visit our [website](#).



Image: Sapphire Wind Farm



05

Working Responsibly

Supporting Australia's transition from coal to renewables comes with a responsibility to protect the environment and respect the communities where we operate. By demonstrating our commitment to these obligations, we aim to build community acceptance and meaningful engagement for delivering renewable energy.



Ecological impacts

We are committed to minimising ecological impacts across all our projects during design and development.

We manage the potential ecological impacts of our projects using the following leading practice control hierarchy:

Avoid – in the first instance, all efforts are made to avoid potential environmental, heritage, cultural and social impacts.

Minimise – where potential impacts cannot be avoided, design principles seek to minimise impacts, as far as feasibly practicable.

Mitigate – mitigation strategies are identified and implemented to manage the extent and severity of the remaining impacts.

Offset – environmental offsets are only used following all efforts to first avoid, minimise and mitigate impacts.



To uphold our commitment to reducing impacts throughout development, construction and operations of our wind farms, we have enhanced our internal processes for planning, design, assessment and project management. Our approach is dynamic, informed and responsive to increasing community expectations and regulations.

We adopt the following specific ecological management principles at various project stages:

Management principles	Design	Construction	Operation
Minimise vegetation clearing and land disturbance			N/A
Protect functional riparian zones			N/A
Use low-biodiversity value land			N/A
Protect historic and cultural heritage values			
Protect agricultural values			
Minimise direct and indirect impacts			
Adopt a flexible approach to design		N/A	N/A
Monitor birds and bats	N/A	N/A	
Deliver Biodiversity offsets			

Case study: Spicers Creek Wind Farm

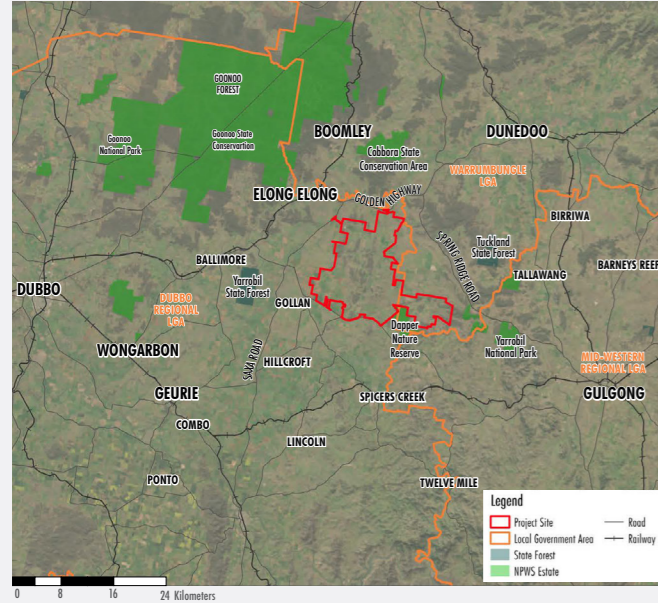


Image: Project location

Spicers Creek Wind farm is a wind generation project, which is currently under development. If the project proceeds, it aims to provide economic benefits to the Central West Orana Region, NSW.

The project is located approximately 25km north-west of Gulgong and 35km north-east of Wellington, within the Dubbo Regional and Warrumbungle Shire Council areas. The project is also located within the Central-West Orana Renewable Energy Zone (CWO REZ), one of five areas identified by the NSW Government to target for development of new renewable energy generation, transmission and storage projects.

Squadron’s planning for the project adopts a methodology to avoid or minimise possible environmental impacts. This design approach is central to the current proposal and has been adopted at all stages of design.

The evolution of the project design has incorporated steps to minimise material impacts, reflecting feedback from stakeholders and increasing understanding of the project site and its constraints.

To avoid impacts on native vegetation, the current wind farm design has focused on locating as much of the infrastructure and temporary construction areas within previously cleared land (known as ‘Category 1 – Exempt Land’) and/or vegetated areas of lower biodiversity value.

A total of 82 per cent of the current Development Footprint for the project is located within Category 1 – Exempt Land. The layout of the wind turbine generators has been offset from vegetated areas at high elevations and instead uses cleared areas at lower elevations where feasible.

The iterative design process has resulted in continued refinement of the project to reach the layout currently proposed, resulting in a reduction in environmental impacts. Since submission of the Environmental Impact Statement, changes have included refinement of the Development Footprint and Development Corridor to further avoid biodiversity impacts.

The Department of Planning, Housing and Infrastructure’s Assessment Report for Spicers Creek Wind Farm (July 2024) noted the following:

“The Department notes that the assessment of a wind farm of this size in this location has been comparatively straightforward to other wind farm projects given the project has been sited and designed to minimise potential impacts, including locating turbines and associated infrastructure within areas of relatively low biodiversity values, and reducing the amenity impacts to the landscape and surrounding non-associated receivers by implementing minimum setback distances from turbines in accordance with NSW government guidelines.”

“The Department considers that significant effort has been made to avoid and minimise biodiversity impacts as far as practicable through project design. This has been achieved through measures such as locating infrastructure within areas of non-native vegetation, adopting buffers for important habitat features and avoiding threatened species habitat, including pine donkey orchid habitat and substantial areas of high quality Box Gum Woodland. Squadron has committed to adopt further avoidance wherever practicable as part of the detailed design process.”



Image: Spicers Creek Wind Farm site

Operational bird and bat monitoring

The principal ecological impact from the operation of a wind farm is the risk of bird and bat strikes and the resulting potential impact on their populations. As such, in accordance with each project's State approvals (and in some cases, also Commonwealth approvals), we prepare and implement Bird and Bat Adaptive Management Plans (BBAMP).

The BBAMP identifies species at risk of strikes and at risk of moderate to high population impacts. It outlines various monitoring programs aimed at identifying suitable habitat areas within the wind farm site, assessing bird and bat use of the wind farm, and monitoring strike rates. The BBAMP also outlines mitigation and management measures that are implemented by the operator with the aim of avoiding and minimising the risk of strikes.

Monitoring activities are implemented by bird and bat specialists and are undertaken on a monthly or seasonal frequency depending on the presence and behaviour of target species.

As the BBAMP is an adaptive management plan, the type and frequency of monitoring and management measures are reviewed annually – based on the results of the previous 12-24 months of monitoring. This ensures these measures are appropriate for managing the risk of impact to target species.

In accordance with the recommendations of these reviews, we will continue to implement the monitoring schedules and mitigation measures as outlined in each Project's approved BBAMP.

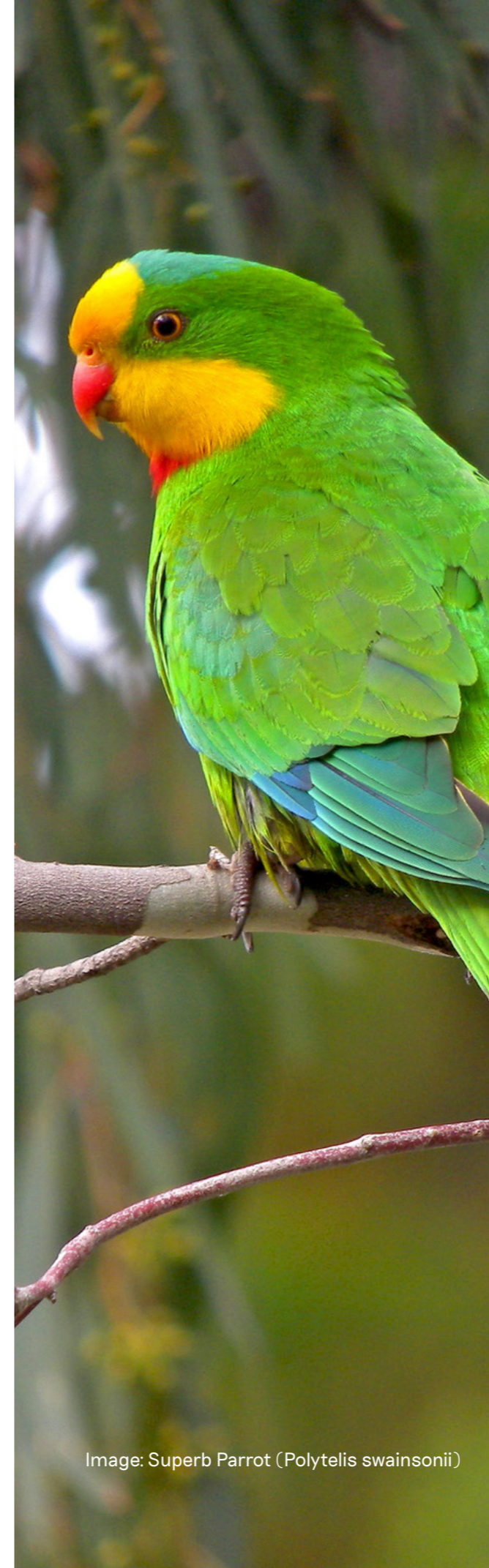


Image: Superb Parrot (Polytelis swainsonii)

Case study: Superb Parrot Conservation Research Project

Background and objectives

The stunning Superb Parrot (*Polytelis swainsonii*) is an open woodland bird species that occurs throughout the inland slopes and plains of inland NSW, including the Australian Capital Territory (ACT), and extending into northern Victoria. The species is currently listed as Vulnerable under Federal and State (NSW, ACT, Victorian) legislation.

Between 2019 – 2024, Bango Wind Farm provided a total of \$500,000 worth of funding towards a Superb Parrot Conservation Research Project, run jointly by the Australian National University and the ACT Government. The research project was designed to improve understanding of the local and regional movements of the Superb Parrot, and to improve knowledge on the breeding and conservation status of the species.

Activities undertaken

Over the five-year research project, key research activities included:

- Deploying GPS transmitters on wild Superb Parrots using a safe and ethical method, to track their local and long-range movement patterns.
- Surveying hundreds of trees across the Superb Parrot's range to identify breeding sites and locate suitable and active nesting hollows.
- Undertaking intensive monitoring of Superb Parrot nestlings to track their survival and fitness.

Results and positive impact

A total of 125 nesting events were recorded, and almost 300 nestlings monitored, providing the most widespread assessment of Superb Parrot reproductive output on record. As such, through our investment in the Superb Parrot Conservation Research Project, Squadron Energy has helped make a significant contribution to the understanding of Superb Parrot ecology in support of the objectives of the [Superb Parrot National Recovery Plan](#).

The research has provided valuable insights into the movement patterns of Superb Parrots between wintering and breeding habitats, and identification of critical landscape and resources within their extent of occurrence.

The research project has also contributed to a better understanding of nesting resources in the South-West Slopes of NSW Important Bird Area, where habitat conservation and restoration will be vital for national Superb Parrot recovery efforts.

More on Superb Parrot conservation at Bango Wind Farm

Bango Wind Farm has established the 'Golden Hollows' Biodiversity Stewardship Site (BSS), located in the South-West Slopes of NSW Important Bird Area.

The BSS will ensure the ongoing protection of existing suitable nesting habitat trees, and supplementary planting of native nest tree species such as Blakely's Red Gum. In 2019, Superb Parrots were recorded breeding on and adjacent to the BSS.



Image: Adult male Superb Parrot fitted with a transmitter, pre-release.

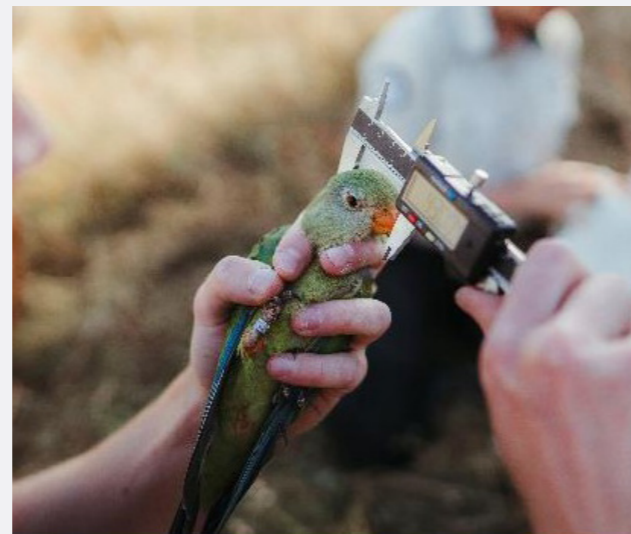


Image: Superb Parrot nestling being measured.

Environmental stewardship

Squadron's purpose is to improve the environment for current and future generations by leading Australia's transition to renewable energy. In FY24, we generated

more than 2,500 GWh renewable electricity from our five operational sites, which is equivalent to powering over 490,000 average Australian households.

Facility	Generation capacity (MW)	FY24 Renewable Energy Generation (GWh)	Expected FY25* Renewable Energy Generation (MWh)
Sapphire Wind Farm	270	693	768
Crudine Ridge Wind Farm	138	310	337
Bango Wind Farm	244	536	657
Murra Warra Wind Farm 1	226	481	475
Murra Warra Wind Farm 2	209	525	615
Total	1,087	2,545	2,851

* Data represents estimated, expected renewable energy net generation at point of connection in FY25, as at end Q1FY25 (i.e. 3 months of actual generation and 9 months of budgeted generation).

Climate Change

We want to help Australia transition to a zero-carbon economy. We are focused on enabling more rapid decarbonisation. We are operating and developing renewable generation assets and Australia's first energy terminal, and aim to develop firming assets such as batteries and peaking power stations. These firming assets will complement renewable power generation when solar or wind power generation is not available or sufficient.

We are working on these energy transition projects to provide a reliable and secure energy system in the short term, without creating a longer-term dependence on fossil fuels.

Each year, we report annually to the Clean Energy Regulator under the National Greenhouse and Energy Reporting Act 2007 (NGER Act).

Facility	Scope 1 GHG Emissions (tCO2-e)	Scope 2 GHG Emissions (Location Based) (tCO2-e)	TOTAL Scope 1 & 2 GHG EMISSIONS (tCO2-e)	Avoided Emissions (tCO2-e)
Sapphire Wind Farm	175	2,010	2,186	471,157
Crudine Ridge Wind Farm	85	408	494	210,894
Bango Wind Farm	89	1,568	1,657	364,538
Clarke Creek Wind Farm 1	13,216	-	13,216	-
Uungula Wind Farm	49	-	49	-
Port Kembla Energy Terminal	2,014	-	2,014	-
Murra Warra Wind Farm 1	150	638	788	379,486
Murra Warra Wind Farm 2	85	1,468	1,553	414,917
Offices	96	61	157	-
Total	15,959	6,153	22,113	1,840,992

Greenhouse gas emissions and avoided emissions from Squadron-owned sites during FY24.

- Note:
- Scope 1 emissions are those direct emissions owned or controlled by Squadron Energy.
 - Scope 2 emissions are indirect emissions from the generation of purchased electricity.
 - Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in Squadron's value chain, including both upstream and downstream emissions. Scope 3 emissions are in the process of being tracked and will be measured by financial year 2025.
 - Avoided emissions are calculated using NGER state-based emissions factors.
 - Total GHG emissions are rounded.

Scope 1 emissions in FY24 increased by 70% compared to FY23, largely due to the increase of construction activities at our Clarke Creek Wind Farm in Queensland.

Scope 2 emissions increased by around 43%, largely due to a decline in wind resource compared to FY23.

Environmental Management

We are committed to minimising environmental impacts and adhering to the principles of ecologically sustainable development to ensure the protection and preservation of the environment for current and future generations.

Effectively identifying and managing our environmental risks is an important part of Squadron's overall risk management approach and is a key aspect of maintaining

our social licence to operate. Squadron Energy maintains an environmental management system (EMS) certified to ISO14001, the internationally recognised standard for environmental management systems, which applies to Squadron's development, construction and operation of energy assets. The EMS sets out our approach to identifying, monitoring and managing environmental risks and compliance requirements.

Compliance

Squadron takes compliance with environmental laws and approvals seriously. Compliance at Squadron means maintaining a proactive culture within our business and in working with our contractors to enable awareness and understanding of our compliance obligations, and ensuring actions are taken to meet those obligations.

During the reporting period, four penalty infringement notices (PINs) were received by Squadron or its contractors - three relating to administrative non-compliances at our Clarke Creek Wind Farm, and one at our

Port Kembla Energy Terminal. None of these non-compliances for which a PIN was issued were classified as significant environmental incidents² or resulted in environmental harm.

No significant environmental incidents or non-compliances with State or Commonwealth approvals or licences occurred in FY24 at our five operational wind farms.

²Significant environmental incidents' correspond to risk consequence ratings of 'Major' or 'Severe', as defined in Squadron Energy's HSE Incident Escalation and Reporting Procedure.

Community impacts

We understand the importance of our role in regional communities where we develop and operate renewable energy projects, and take our obligations regarding community impacts seriously.

We carry out community and stakeholder engagement through our project teams with guidance from our Stakeholder Engagement Team and support from our First Nations Engagement Team.

We believe it is essential to build trusting relationships between our people, on the ground who are involved in the project daily, and the local stakeholders. This process starts with thorough stakeholder mapping and analysis to understand community needs and to begin forming relationships from the very start of the project. Our approach to engagement is also informed by the Public Participation Spectrum from the International Association of Public Participation, which helps us tailor our engagement to the level of impact in the community.

Our engagement includes:

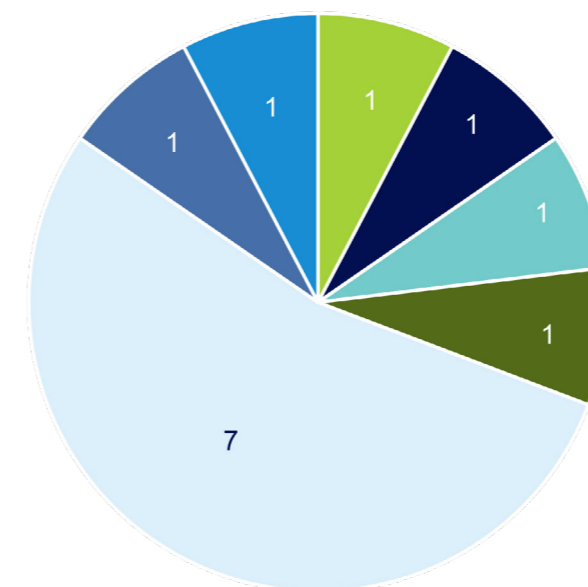
- seeking feedback from the local community on the proposed project and incorporating that feedback into project planning and design where appropriate
- keeping the community informed with clear, accurate and timely information about the project, its impacts and its benefits

- identifying key stakeholders for further engagement and offering various opportunities for meaningful engagement with all stakeholders
- understanding the potential social impacts of the project and taking steps to reduce or mitigate those impacts, and
- ensuring our project teams fully understand the local context, including any impacts the project may have or opportunities it could provide.

As a long-term owner and operator, Squadron Energy is dedicated to contributing positively to the communities where we work. We share the benefits of our projects by supporting communities over the long term.

In FY24, we worked closely with communities during the development, delivery and operation of our projects. We conducted community information sessions in local communities connected to the Moreton Hill, Gol Gol, Spicers Creek, Koorakee and Conargo wind farms, as well as four community briefings relating to the Central West Orana REZ. We participated in 12 community consultative committees related to Uungula, Crudine Ridge, Bango and Clarke Creek wind farms.

During the period, we received only 13 complaints, all of which were resolved within the timeframes set by our complaints



management procedure. Most complaints were related to traffic and access, as shown in the chart below:



We recognise that each community is unique. That's why we work with councils and local groups, and consult with the community, to tailor the benefits of each project and ensure a lasting positive contribution to each region. We aim to actively support local capacity building

across all our projects. Further details on this approach and the benefits we've achieved together with our communities are provided in the [Developing Communities](#) section of this report.

Cultural Heritage

At Squadron Energy, we aim to build respectful and positive partnerships with First Nations peoples.

Our 'Reflect' level Reconciliation Action Plan (RAP) outlines our approach to building meaningful relationships with First Nations communities, amplifying their voices, promoting shared growth, and ensuring our initiatives are culturally relevant and impactful.

Our RAP focuses on three key areas:

1. Strengthening engagement: Ensuring Aboriginal and Torres Strait Islander perspectives shape our decision-making.
2. Building understanding and respect: Continuously deepening our knowledge of, and respect for, First Nations cultures, histories, and connections

to land and waters. This involves acknowledging and protecting cultural heritage values in all areas of our operations.

3. Ensuring good governance: Maintaining transparency and accountability through robust governance of our RAP commitments.

We are committed to embedding reconciliation principles across our organisation. Our RAP Working Group, led by team members from various disciplines, drives this effort, with our CEO, Rob Wheals as our RAP champion. Learn more about our RAP on our [website](#).

Squadron First Nations Engagement Team

Squadron has invested in a dedicated First Nations Engagement (FNE) Team to ensure our engagements are culturally inclusive and meaningful. In FY24, we hired two key positions: Head of First Nations Engagement

and a First Nations Engagement Facilitator based in the Central-West Orana REZ, who leads engagement activities in this important area.

Case study: Celebrating connection to Country with Justin Toomey-White



Justin Toomey-White, Squadron Energy's First Nations Engagement Facilitator, is a proud Wiradjuri man from Wellington, NSW. In his role, Justin works closely with Traditional Custodians, ensures cultural heritage is respected in project development, and engages with schools and community groups to highlight career opportunities in the renewable energy sector.

Justin reflects on his deep connection to Wiradjuri Country, his passion for giving back to his community and how his role is focused on strengthening deeper ties with First Nations communities.

"There is such a range of opportunities for First Nations people in the renewable energy sector. I'm really focused on engaging and encouraging First Nations participation to ensure the entire community is part of our renewable journey."

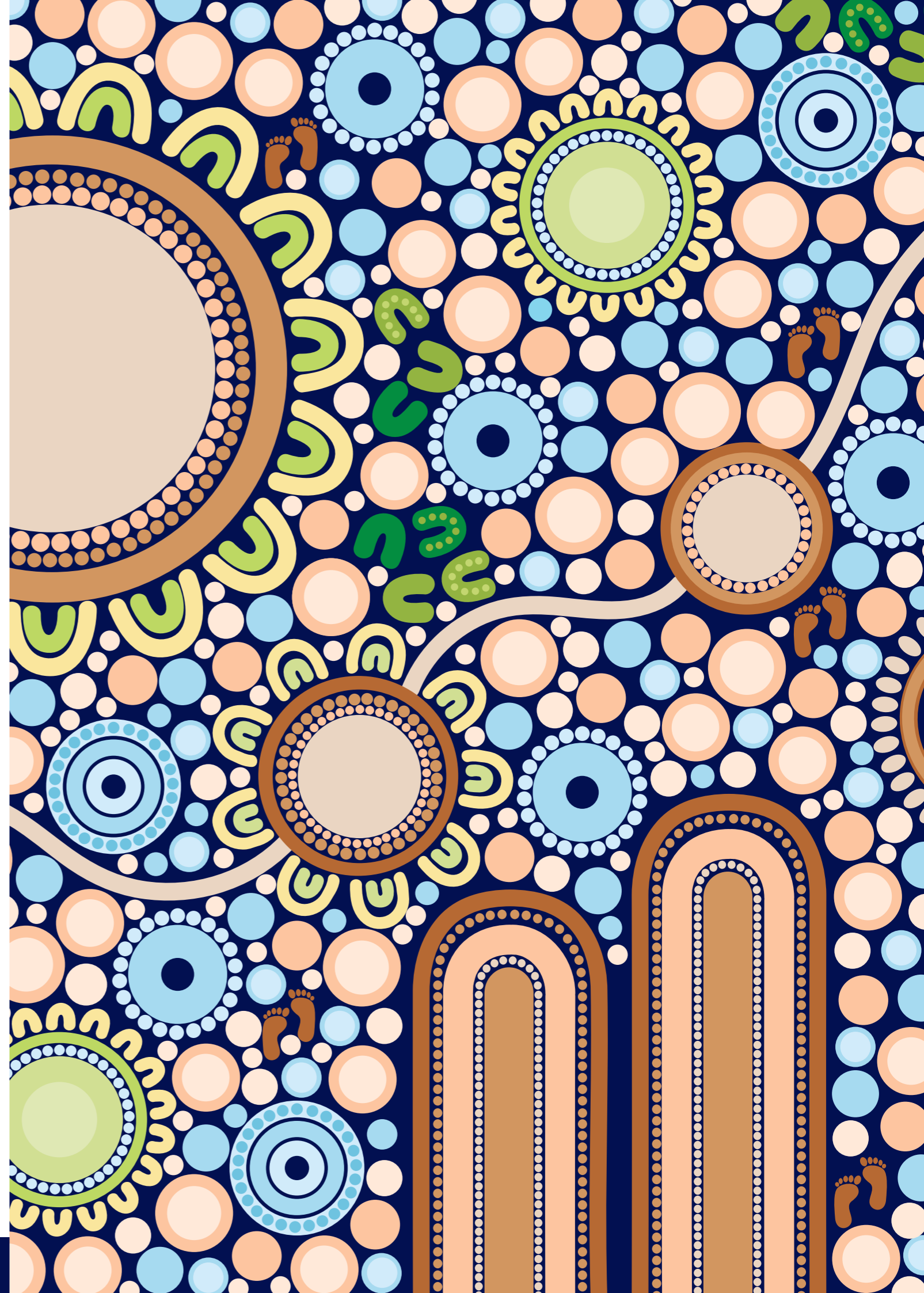
"To be able to work with all age groups and to be able to give back to these young kids and say you can be successful at any career path that you want is incredibly rewarding."

"To be able to work on Country and give back to a community that has helped shape the man I am today is very special to me."

Listen to Justin describe what his role at Squadron means to him [here](#).

We thank the following First Nations community groups who engaged with us during FY24:

Project / Asset	First Nations Group consulted
Boorolong Wind Farm	Newara Aboriginal Corporation
Clarke Creek 1 & 2 Wind Farm	Barada Kabalbarra Yetimarla Native Title Claimants
Conargo Wind Farm	Deniliquin Local Aboriginal Land Council, Yarkuwa Indigenous Knowledge Centre
Gol Gol Wind Farm	Dareton Local Aboriginal Land Council, Mutthi Mutthi Aboriginal Heritage Consultancy (Verna Pappin-Eade)
Koorakee Energy Park (KEP)	Balranald Local Aboriginal Land Council Maari Ma Aboriginal Health Centre - Balranald Dareton Local Aboriginal Land Council, Murray Valley Aboriginal Cooperative, Wilandra Lakes World Heritage Committee, Mutthi Mutthi Aboriginal Heritage Consultancy (Verna Pappin-Eade)
Spicers Creek Wind Farm	Wellington Aboriginal Action Panel CWO REZ Aboriginal Working Group, Wellington Local Aboriginal Land Council, Dubbo Regional Aboriginal Land Council
Uungula Wind Farm	Wellington Aboriginal Action Panel CWO REZ Aboriginal Working Group, Wellington Local Aboriginal Land Council, Dubbo Regional Aboriginal Land Council
Moreton Hill Wind Farm	Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC)





06

People Engagement

When we achieve our goals, it will be a direct result of our strong leadership, safety culture, and the skills and experience of our people. A strong employee value proposition is critical to attracting and retaining the best talent to grow our business, develop skills in renewables and enhance career pathways in the green energy transition.



Health, Safety and Wellbeing

At Squadron, our utmost priority is the health, safety, and wellbeing of our employees and those working on or affected by our projects.

We are fully committed to conducting our business in a manner that prevents harm to the communities in which we operate. We firmly believe that every individual has the right to a safe and healthy work environment, ensuring they return home safely and in good health at the end of each day.

We consider health and safety to be a shared responsibility, requiring ongoing dedication from all our employees, leaders, and contracting partners. Our values and Code of Conduct form the foundation of our actions and guide us in everything we do. Safety is not just a priority but a key value.

Our health and safety strategy covers four core areas:

- Risk management
- Leadership
- Competency and capability
- Effective systems to support these core strategic areas.

Squadron operates a Safety Management System certified to ISO 45001.

All new employees are required to undertake mandatory work health and safety compliance training, including a module on Squadron's expectations regarding safe driving. Additional training is provided according to role specific needs, including first aid and mental health training courses. During FY24, our people undertook a total of 1,229 hours of health and safety training.

During FY24 our focus on safety lead indicators included hazard observations, leader safety interactions, training completion and internal audits. As the year progressed, the completion of these activities decreased due to several factors, including increased turnover in health, safety and environmental and operational personnel.

Our Total Recordable Injury Frequency Rate rose from 7.64 in the previous 12 months to 10.44. Of this headline FY24 figure, our employee TRIFR was 2.06, while our contractor TRIFR was 13.29. This year-on-year change was largely due to an increase in additional higher-risk construction activities undertaken during FY24, with two wind farms under construction.

We have addressed this trend by developing and rolling out a schedule of lead indicator activities with accountability for roles at all levels of the organisation. We have also implemented an annual internal audit schedule to ensure that we're delivering on these activities. We expect this renewed focus on lead indicators will deliver a reduction to recordable injuries in the business over the next reporting period.

We will also continue to focus on a consistent approach to managing work, health and safety to assist with managing the wellbeing of our employees, communities, and customers.

As we move into FY25, we are evolving our systems and processes to enable improved management of overall health and safety risks within the business. We are focused on improving our communication and promotion of the key systems and risk management activities that will drive health and safety improvements. This includes an increase in focus on how we manage psychosocial risks in our business, which will include implementing a psychosocial management framework.



Image: Bango Wind Farm

Employee engagement

Our human capital is the most valuable asset we have.

To be successful in our purpose of leading Australia’s transition to renewable energy, we need to build a high performing team of engaged employees, united behind our Squadron purpose and vision. We recognise that building a stronger employee value proposition helps to attract and retain talent, which helps retain corporate knowledge skills and experience.

We approach employee engagement by promoting a supportive, empowered and values-led working culture, and showing our appreciation for our employees through our market-leading employee benefits.

Employee benefits and wellbeing initiatives

We continue to offer our people a wide range of initiatives to support their health and wellbeing.



Wellbeing leave (an extra week of leave if employees utilise four weeks of leave in a 12 month period)

Wellbeing activities organised and promoted throughout the year

Tellus Health Employee Assistance Program available to employees and their families at no cost

Physical health initiatives including annual flu vaccination program

Fitness wellbeing incentive where eligible employees can access \$250 towards wellbeing items each financial year



A generous employer paid parental leave policy

Salary packaging opportunities available to all employees

Online corporate clothing portal to ensure efficiency and ease of access to all employees

Generous phone allowance or corporate phone provided to all employees

Part of a larger group of Tattarang companies providing exclusive employee discounts



Annual performance reviews with a focus on professional and personal development

Leadership programs for executive and emerging leaders, and training opportunities

Offsite team building days and internal networking opportunities

Commitment to an agile and flexible workforce

Short Term Incentive scheme including the ability to earn a bonus

Employee survey

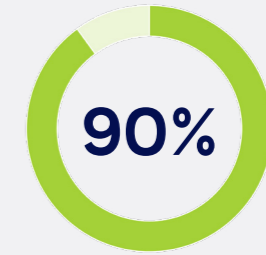
In November 2023, we conducted an employee pulse survey to gauge the overall sentiments, engagement levels and satisfaction of Squadron employees. The survey gave us the opportunity to capture real-time insights on various aspects of the workplace, allowing us to identify trends, address concerns, and make timely improvements to enhance the overall employee experience.

Our people engaged positively with the survey, with a response rate of 85%. Through the survey, our people told us that they were proud to tell others that they work at Squadron. Employees reported high levels of support and care from their line managers, including in accessing flexible working arrangements.

Internal communication was identified as a strength in our business, with our people reporting being well informed of news, initiatives, internal opportunities and company news. Our people expressed a strong sense of psychological safety in sharing thoughts and ideas with peers.

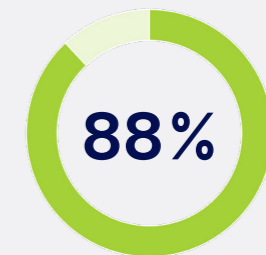
We also received constructive feedback. Our employees expressed a desire to learn more about our future direction as a company, and identified the importance of clarity in career progression as a key priority.

We appreciate our people’s feedback and are using these insights to inform our ongoing employee value proposition.



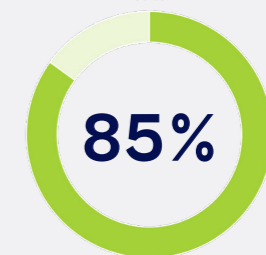
Agreed

I am proud to tell others I work at Squadron



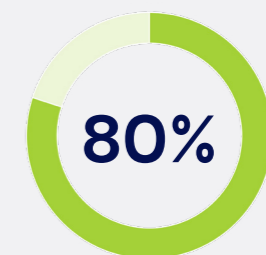
Agreed

My line manager demonstrates SQE’s core values



Agreed

I feel respected by my team and other teams I work with



Agreed

I feel comfortable sharing my thoughts and ideas with my peers

Employee retention

Employee retention is an enabling factor of organisational success. Reduced employee turnover helps lower costs associated with recruitment and training, which in turn enables us to provide more cost-effective, energy solutions to our customers. Squadron's total employee turnover rate in FY24 was 14 per cent, with voluntary turnover accounting for 8 per cent. This compares favourably against the average rate of 15 per cent across Australian workplaces during FY24 and reflects our positive work culture³. However, we know we have more to do to retain our talented employees. That's why in FY25 we are undertaking a review to help us understand key themes behind employees' decisions to leave our business and to inform our retention strategy.



Learning and development

Our people leaders' experiences and leadership journeys vary across our business. To best support their individual needs and those of their teams, Squadron has developed a partnership with the Australian Institute of Management and other speciality leadership providers, allowing our people leaders to obtain leadership training on an as-needs basis.

Throughout FY24, 40 per cent of our people leaders undertook voluntary leadership training. This support has led to leaders undertaking programs to develop their leadership foundations, further their understanding of leading teams and deepen their effectiveness as leaders. To continue this development and create one leadership voice, we are developing a Squadron Energy leadership program in FY25.

³According to the Australian HR Institute's Quarterly Australian Work Outlook - May 2024, which reported the 12-month average employee turnover rate to the end of June 2024 was 15%. <https://www.ahri.com.au/resources/hr-research/ahris-quarterly-australian-work-outlook-september-2024>, last accessed 4 September 2024.

Our people are also taking up voluntary learning and training opportunities, demonstrating motivation and empowerment to continually grow and develop their skills. During FY24, 60 per cent of our people signed up for voluntary learning and development opportunities.

We have recently invested in all-employee access to LinkedIn Learning to continue to expand the learning channels available to our people and allow them to develop anywhere, anytime.



Diversity, Equity & Inclusion

At Squadron, we are committed to a culture that embraces and fosters Diversity, Equity and Inclusion (DE&I).

Diversity encompasses the differences between people in how they identify in relation to their social identity (e.g., cultural background, disability, gender) and their professional identity (e.g., education, work experiences).

We ensure that our people are provided with equal opportunity and consider equitable approaches for those groups that may be disadvantaged. Inclusion at Squadron means that employees work together in an environment where diversity and difference is respected. We ensure that employees can bring their whole selves to work.

Squadron has a strong commitment to DE&I and the fundamental principle that all employees should be able to equally participate in our workforce, management, senior executive and the Board.

To create an inclusive workplace that celebrates diversity in all its forms, our focus areas are:

Delivering on our Reconciliation Action Plan (RAP)

We are playing our part in building a society where there is equity in health, wellbeing and employment outcomes for Aboriginal and/or Torres Strait Islander people. We

have formalised this commitment through our RAP. Read more about our First Nations engagement in the [Cultural Heritage](#) section of this report.

Supporting parents and carers

We ensure equal access to parental leave for employees of all gender identities and sexual orientations, so that everyone can fully participate at home and at work. Our approach to parental leave provides a generous paid scheme for both primary and secondary carers, and a flexible suite of leave and support options to enable employees to care for their families.

Delivering on gender equality

Gender is not a barrier to career opportunities and advancement at Squadron. We are inclusive of all gender identities throughout our recruitment processes. We believe that through gender-balanced, diverse leadership and talent pipelines, we can better represent the needs of our customers.

Supporting fair remuneration and the objectives of gender pay equity

At Squadron, we continually benchmark our roles against our industry peers and other industries to ensure we are remunerating fairly and ensuring gender pay equity. Our



first report required under the *Workplace Gender Equality Act 2012* (Cth) will be submitted by May 2025. We will report on our remuneration data in 2025.

Continually enhancing our recruitment and selection practices

We work to enhance our recruitment and selection practices to ensure we are eliminating bias (real or perceived) at all levels of the organisation (including external vacancies, restructures, and promotions) regardless of employment type (full time, part time, casual, or contractor). Specific practices we implement include training interviewers on what bias is and how to avoid it, standardising interview questions for the same role, implementing skills-based assessments, ensuring diverse interview panels, and drafting position descriptions with inclusive language.

Ensuring LGBTIQ+ Inclusion

We embrace LGBTIQ+ diversity and inclusion in our workplaces and celebrate events that are important to our diverse workforce.

Enabling access for people with disabilities

We aim to ensure our offices and sites are accessible for people with disabilities.

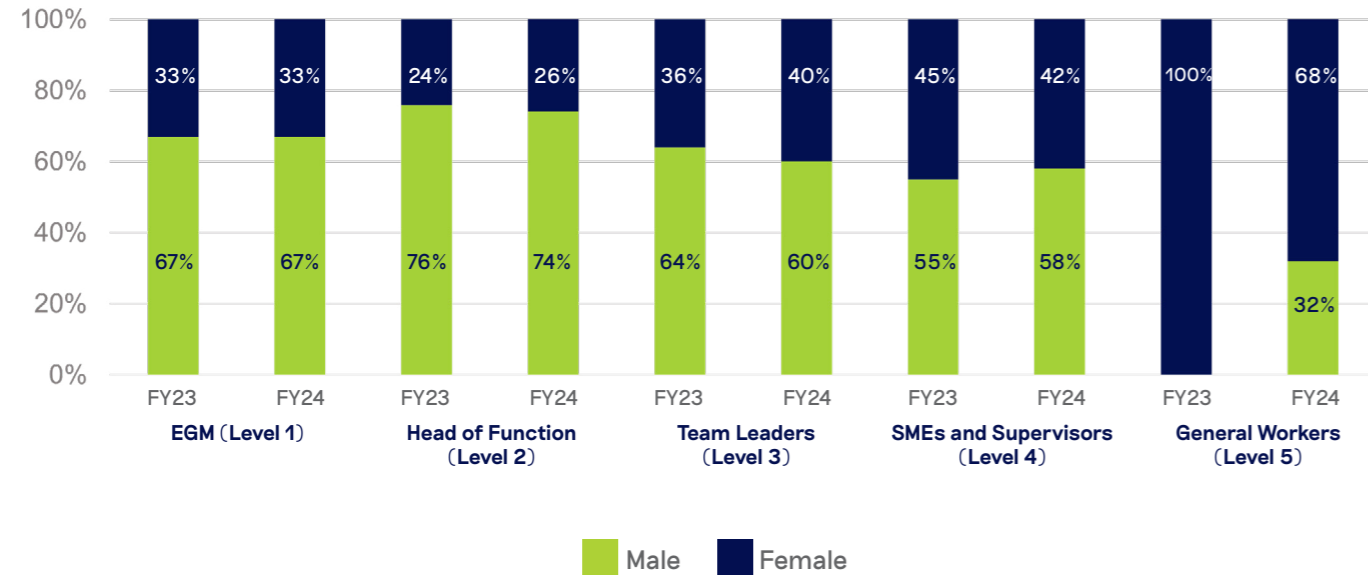
Use of accessible language

We aim to use plain English in our documents and communications to ensure our information is understood by everyone.

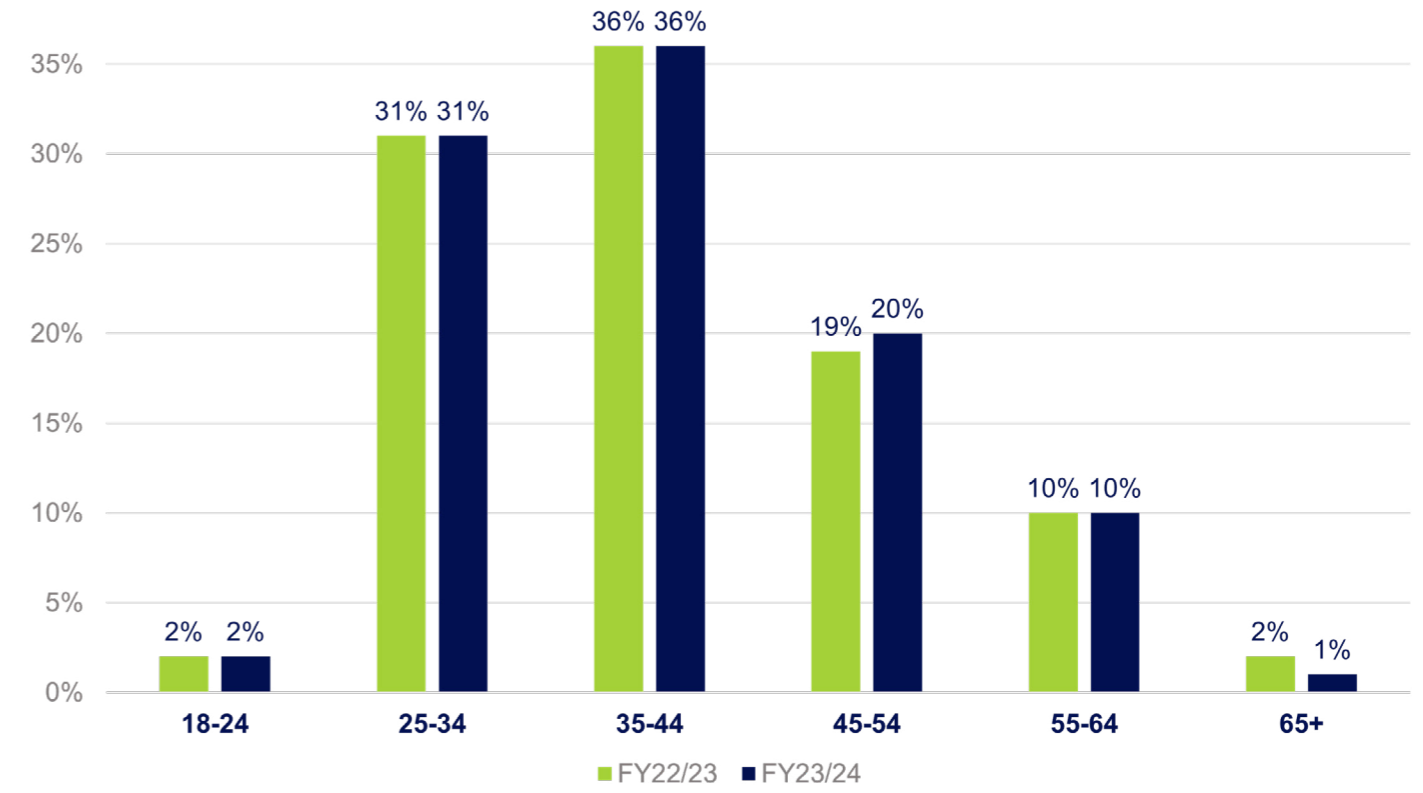
Establishing a Diversity, Equity and Inclusion Committee (DE&I Committee)

To drive our efforts and monitor our effectiveness, we will be establishing a DE&I Committee in FY25. The Committee will include diverse representation across the business.

Management and leadership gender composition



Age of employees



Employment by type

Employment type	FY22/23	FY23/24
Full-time	98%	96.54%
Part-time	2%	2.69%
Casual	0%	0.77%
Total	100%	100%





07

Business Integrity

Our stakeholders trust us to 'do what we say we're going to do' and to 'do the right thing'.

Through effectively managing risk and compliance we can demonstrate our integrity to customers, suppliers and regulators to position ourselves as partner of choice.



Business conduct

Squadron Energy is on a mission to improve the environment for current and future generations by leading Australia’s transition to renewable energy. Strong governance is essential to enabling this transformation, as it ensures that our actions are guided by our values and driven by transparent and well-informed decisions.

This commitment to robust governance not only safeguards our operations but also strengthens our ability to innovate and deliver on our goals with integrity and accountability.

Squadron Energy Board and Board Committees

Squadron Energy’s Board has adopted a principled approach to corporate governance, emphasising effective oversight, leadership, and accountability across the organisation. The Board redesigned its Corporate Governance committee framework to optimise decision making and reporting structures. The revised governance framework intends to clarify the scope, responsibilities and linkages between the Board, Board Committees, Management Committees, and operational and functional working groups.

There are two Board committees – the Audit Risk & Compliance Board Committee, and the Health, Safety, Environment & Sustainability Board Committee. At a management level, the various management committees include representatives from Squadron Energy’s Executive General Managers and relevant Senior Managers to provide relevant information to the Board, Board committees, or the CEO.

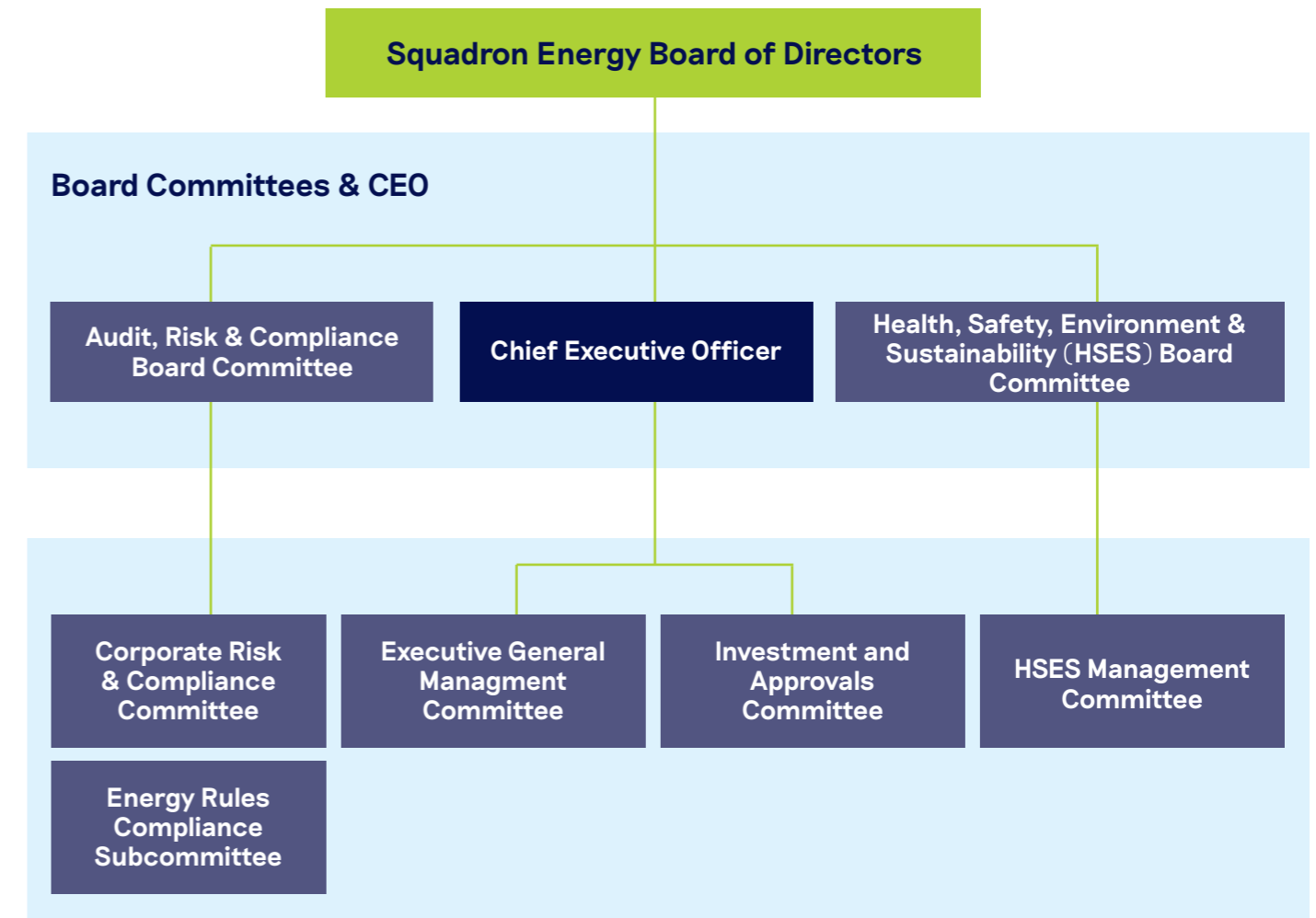


Figure 1: Committee structure in FY2024



Image: Sapphire Wind Farm

Integrity - Code of Conduct

Integrity is one of our core company values and is essential to our corporate governance. Our Code of Conduct (the Code) serves as the tool through which we translate our values into everyday actions and behaviours. The Code establishes the high standards to which we hold ourselves and one another accountable, outlining our commitment to:

- ethical business practices
- our people and culture
- our communities
- our environment.

All employees and individual contractors are required to complete a two-part training course on the Code within one week of commencing with Squadron Energy. The training requires confirmation that the employee has read and understood the Code, and an interactive module and quiz to test knowledge of the Code. During FY24, 90% of our employees had completed this training.



We provide a range of mechanisms to report instances that do not align with our integrity standards, such as breaches of our values, code of conduct or policies. These mechanisms include:

- encouraging employees to raise issues with their manager or a member of our People and Sustainability team in line with our Workplace Grievance Process
- encouraging community members to report via our community or site offices or via our website
- providing a Whistleblower Hotline for employees and external stakeholders.

Our Whistleblower Hotline provides an independent, confidential and anonymous mechanism for anyone, including employees, contractors, suppliers and members of the community, to raise concerns regarding potential illegal activity, or serious misconduct.

Risk management

Our approach to risk management

Squadron Energy maintains a comprehensive, integrated strategy for recognising and addressing risks throughout our business operations. This approach provides the Board, CEO and Executive General Management team with a unified and integrated perspective on risks and opportunities across the organisation.

This integrated risk management approach is designed to establish a consistent approach to identify, assess, manage and report risks that could impact our strategic objectives and operational efficiency. Risk updates are periodically reported to the Board.

The Squadron Energy Risk Management Framework consists of a Risk Management Policy and a Risk and Opportunity Management Process.

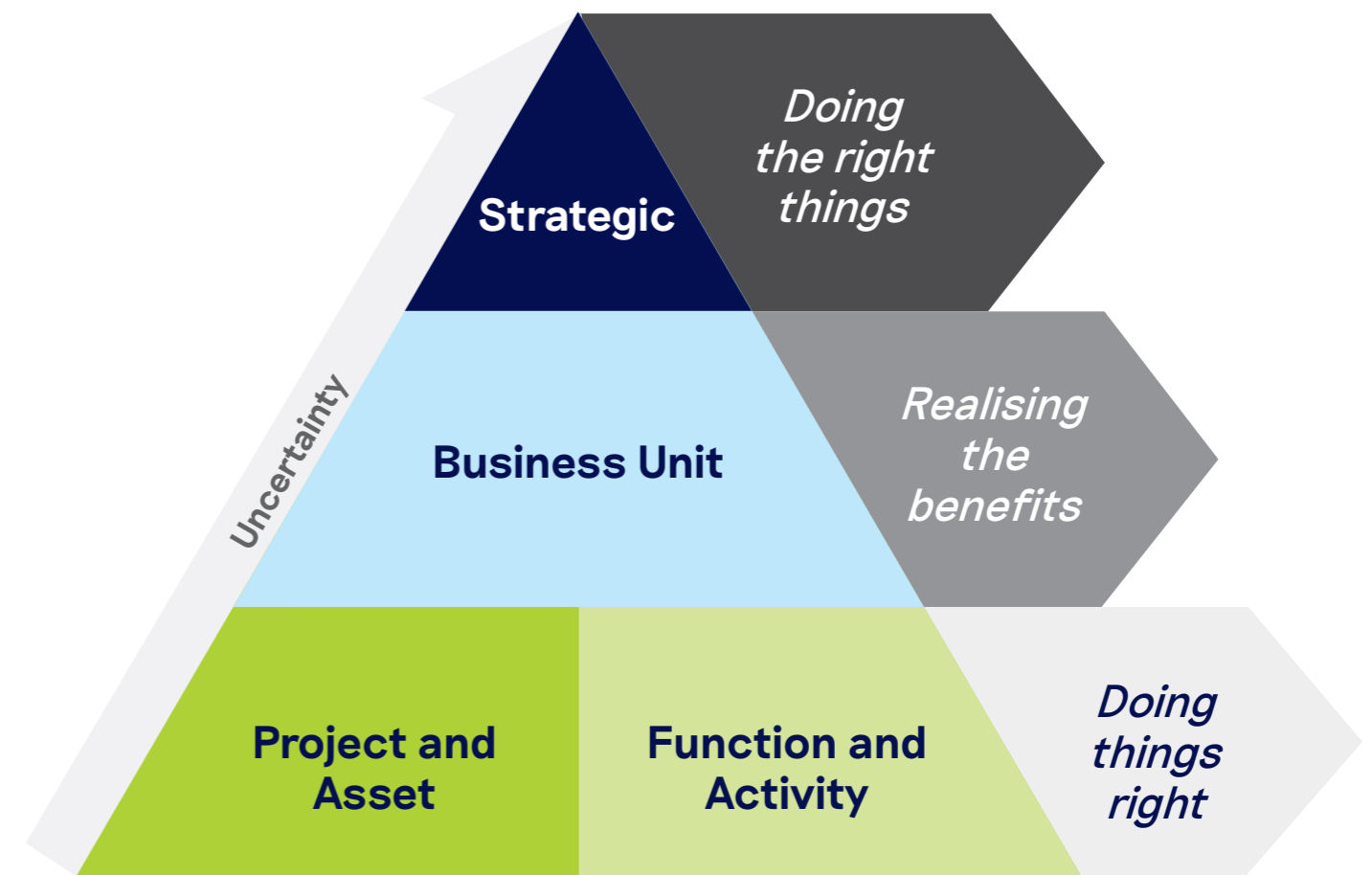


Figure 2: Risk Hierarchy / Levels of Risk

Risk-based approach to sustainability

The management of sustainability risks is a critical component of Squadron Energy’s operational strategy and long-term success.

As we drive Australia’s transition to renewable energy, it is essential that we proactively identify, assess, and mitigate risks that could affect the sustainability of our business, the environment, and the communities in which we operate. This approach aligns with our commitment to responsible business practices. We address potential environmental impacts at our development and operational sites, consider the effects of climate change on our business operations, ensure the health and safety (physical and psychological) of our workforce, and maintain positive relationships with the communities we serve.



Assurance

Our Internal Audit function plays a crucial role in ensuring the application and effectiveness of our systems and processes. Through audits, we identify opportunities for improvement and verify compliance with both regulatory requirements and our own internal standards to drive continual improvement.

Demonstrating our commitment to quality, consistency and continuously improving our governance practices, Squadron Energy is certified against the latest standards set by the International Standards Organisation (ISO) relating to our:

- **Quality Management System - ISO 9001:2015**
- **Environmental Management System - ISO 14001:2015**
- **Occupational Health and Safety Management system - ISO 45001:2018**

Regulatory compliance

Ensuring compliance with regulatory obligations

Squadron Energy is committed to complying with all applicable laws and regulations. We are implementing an enterprise-wide compliance framework that will establish an annual compliance cycle integrated with our existing risk management and assurance processes. The Squadron Energy Compliance Framework aligns with the

approach outlined in *ISO 37301 Compliance management systems*. The Framework is supported by appropriate tools that will enable us to proactively identify, analyse and evaluate our compliance obligations and the effectiveness of systems of internal control. Changes to legislation are also tracked via these tools.

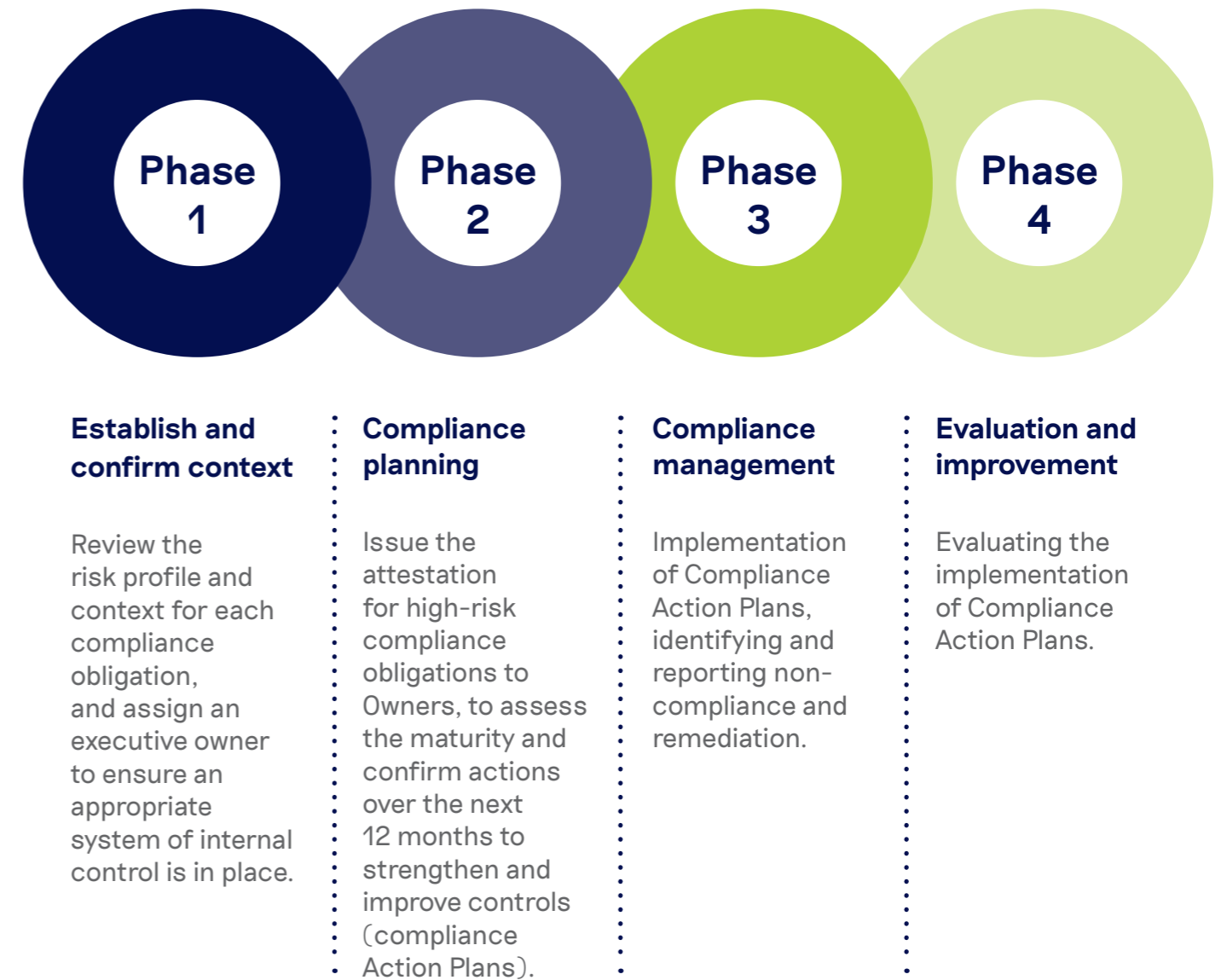


Figure 3: Annual Compliance Cycle Phases

Policies

Our core principles and values are documented in the Code, which is supported by a suite of corporate policies and processes, including:

- Anti-Bribery and Corruption and Anti-Money Laundering
- Compliance Management
- Conflicts of Interest
- Cyber Security
- Environmental Policy
- Human Rights and Modern Slavery
- Privacy
- Quality
- Risk Management
- Whistleblower Policy
- Workplace Behaviours
- Workplace Health and Safety.

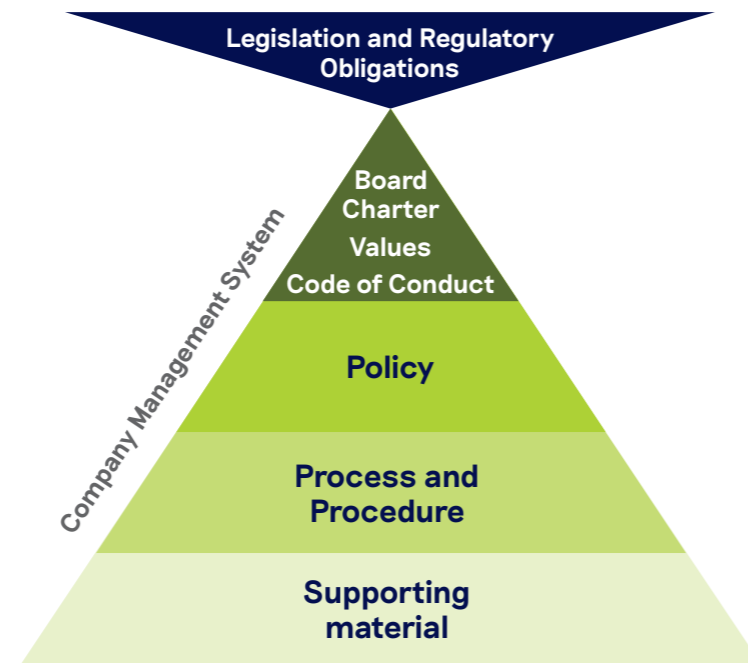


Image: Sapphire Wind Farm

Anti-bribery and corruption, and anti-money laundering

Squadron Energy is committed to doing business in an honest and ethical manner. We take a zero-tolerance approach to any form of bribery or corruption in our business or in those we do business with. We do not obtain or retain business through any unethical or illegal means and all contracts and payments, including material gifts and hospitality, are properly recorded.

Squadron Energy is also committed to conducting its business in accordance with our regulatory obligations relating to money laundering and terrorist financing. We have processes in place to prevent illicit activities within our operations, including training on our Anti-Bribery and Corruption, and Anti-Money Laundering Policy. Reporting mechanisms are in place to allow employees and third parties to confidentially report any suspected violations.

Privacy

Squadron Energy is committed to protecting the privacy of all personal information we hold, including data belonging to our employees, customers or partners. We work to ensure that we comply with the *Privacy Act 1988* (Cth) (Privacy Act), including the Australian Privacy Principles under the Privacy Act, and any other applicable privacy laws.

Squadron Energy will only collect, use, store and disclose personal information in accordance with our Privacy Policy. Squadron has a mandatory Privacy Training for all employees. During FY24, 95% of our people completed the privacy-related training course.

Competition Law

Squadron Energy takes its obligations under the *Competition and Consumer Act 2010* (Cth) and the Australian Consumer Law seriously. Squadron Energy has a Competition Law Policy and a detailed guide which together provide an overview of

relevant competition and consumer laws and outlines Squadron's expectations of its directors, employees and contractors. Competition law training has been conducted by key personnel in our business.

Ethical supply chains

Our suppliers

Squadron has more than 900 direct suppliers who provide us with products and services – from the plant and equipment that is core to our business, through to the support services that enable our broader business activities. Of our direct suppliers, 98 per cent are located in Australia but our supply chain network extends globally.

Responsible supply chain management is critical to managing financial and delivery risk and maintaining business continuity.

In addition, the practices, behaviours and approaches of our suppliers and contractors can impact our reputation. Beyond this, we believe we have a responsibility to use our leverage to influence better ethical practices in our supply chain. Our Supplier Code of Conduct sets out our expectations of our suppliers and contractors across health, safety, environmental, social and governance performance areas, to uphold our values and standards.

Modern slavery

Squadron conducts business in a way that respects the human rights of our employees, the communities in which we are active, and those working within our supply chains. In particular, Squadron Energy is committed to working to ensure that there is no modern slavery in our supply chain.

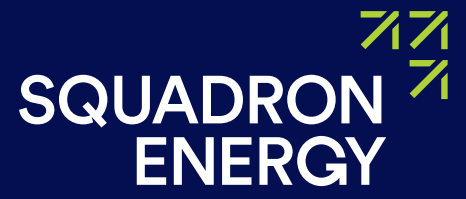
We are committed to complying with all applicable modern slavery laws and principles, including the *United Nation's Universal Declaration of Human Rights* and the *Modern Slavery Act 2018* (Cth), as well as working with our suppliers to do the same. This year we will publish our inaugural Modern Slavery Statement required under the *Modern Slavery Act 2018* (Cth).

We are continuing to strengthen our approach to modern slavery by further embedding our modern slavery risk management framework across the organisation.

Our Human Rights and Modern Slavery Policy sets out our commitment to ending modern slavery, underpinned by the Core Principles informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Core Conventions on Labour Standards and the United Nations Global Compact.



Image: Clarke Creek Wind Farm



Contact

info@squadronenergy.com

squadronenergy.com