

FY25 AUSGRID GROUP
MODERN SLAVERY
STATEMENT

Wired
for good



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ACKNOWLEDGMENT OF COUNTRY

Ausgrid Group acknowledges and pays respect to Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of this land, their unique ability to care for Country and deep spiritual connection to it. We honour Elders past, present and future, understanding their knowledge and wisdom ensures the continuation of culture and traditional practices.

We acknowledge the contributions of the Ausgrid Group’s First Nations employees for sharing their knowledge and experiences, and for their continued work in the organisation to move us towards our future aspirations.

Artwork designed by Charmaine Mumbulla, a proud Kurna and Narungga woman. The artwork explores the dynamic relationship of energy sources and pathways on Country for Aboriginal People – sun, lightning and fire.



Message from the Chairman and CEO

Ausgrid Group is committed to human and labour rights and the global eradication of modern slavery in all its forms.

Our FY25 Modern Slavery Statement (**Statement**) sets out the actions we have taken, and continue to take, to manage modern slavery risks within our operations and supply chain.

As Australia's largest electricity distributor, we recognise the critical role we play in enabling communities to decarbonise and electrify. Our purpose is making electricity accessible to all. We believe that respect for human rights is fundamental to building a fair, resilient and sustainable future.

The Global Slavery Index estimates that nearly 50 million people¹ are in modern slavery globally. The risk of harm to people from modern slavery exists across international supply chains and multiple industries including for goods and services we procure.

To help us to play our role to address this complex issue, we have policies and due diligence processes in place to assess and manage the risk of modern slavery across our operations and supply chain. We have made progress this year in strengthening our systems, deepening our supplier engagement, and enhancing our internal readiness to identify and respond to modern slavery risks.

During the year, we began integrating the Fair Supply modern slavery due diligence platform and embedded our supplier 'deep dives' program to enhance our understanding of modern slavery risk with key suppliers. We also developed a Modern Slavery High-Risk Protocol, redeveloped

our internal training and drafted a Modern Slavery Risk Management Framework to strengthen organisational capability. Additionally, we conducted a mock critical incident workshop to test our response readiness.

Collaboration with our peers, industry organisations and governments, both state and national, will also be critical to influence supply chains and address systemic modern slavery risks where they occur. We welcome the appointment of Australia's inaugural Federal Anti-Slavery Commissioner – a milestone that signals a more coordinated and ambitious national effort to address modern slavery.

Ausgrid Group is pleased to have contributed to the Commissioner's 2025-2028 Strategic Plan and looks forward to ongoing engagement to support systemic change. As we accelerate the clean energy transition, we remain steadfast in our commitment to uphold human rights and address the risks of modern slavery in our operations and supply chain.

Dr Helen Nugent AC
Chairman

Marc England
Chief Executive Officer



We have made progress this year in strengthening our systems, deepening our supplier engagement, and enhancing our internal readiness to identify and respond to modern slavery risks.

¹ Walk Free Global Slavery Index (GSI) www.walkfree.org

Reporting entities

This Statement is jointly made by the following reporting entities:

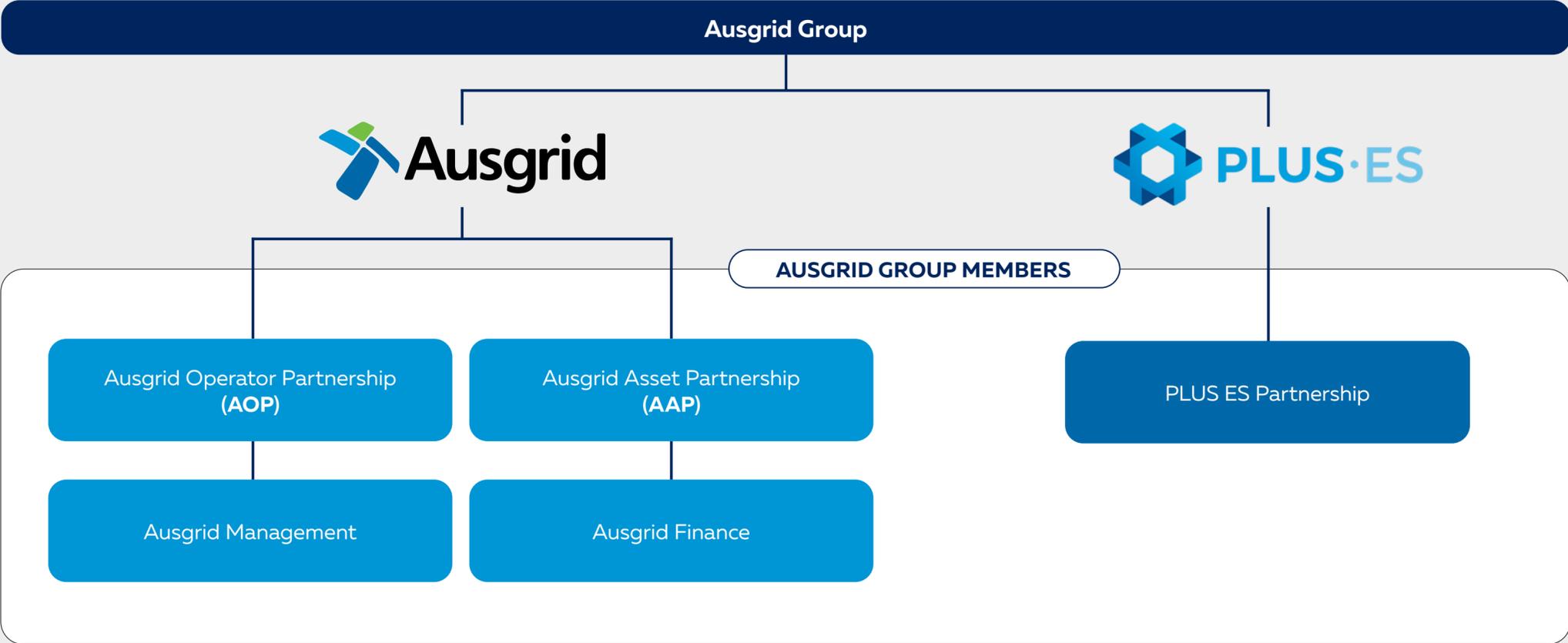
1. Ausgrid Operator Partnership (ABN 78 508 211 731) (**Ausgrid**) and its subsidiary, Ausgrid Management Pty Ltd (ACN 615 449 548) (**Ausgrid Management**);
2. Ausgrid Asset Partnership (ABN 48 622 605 040) (**Ausgrid Assets**) and its subsidiary, Ausgrid Finance Pty Ltd (ACN 615 343 005) (**Ausgrid Finance**); and
3. PLUS ES Partnership (ABN 30 179 420 673) (**PLUS ES**).

Together, these are referred to in this Statement as **Ausgrid Group** and each are an **Ausgrid Group Member**, pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) enacted on 1 January 2019.

This Statement is for the financial year 1 July 2024 to 30 June 2025 (the **reporting period**) and is approved and endorsed by the respective Boards of the Ausgrid Group Members, which are their principal governing bodies.

Each Ausgrid Group Member had a consolidated revenue of at least \$100 million during the reporting period and is classified as a reporting entity pursuant to the Act. This Statement has been prepared by addressing the mandatory criteria for content set out in the Act.

AUSGRID GROUP PUBLISHES A COMBINED STATEMENT WHICH INCLUDES THE FOLLOWING AUSGRID GROUP ENTITIES:



See [Appendix 2: List of reporting entities](#) on [page 27](#) for further information

Consultation and Board approval

During FY25, we consulted across each of the reporting entities, which met the requirements for reporting under the Act.

Ausgrid Group applied a cross-functional approach to preparing and drafting this Statement using input from across Ausgrid Group. The Statement was developed in consultation with the Procurement, Sustainability, Legal and Organisational Capability teams.

The Executive Leadership Team, consisting of the CEO and other Group Executives, operates commonly across the reporting entities within the Ausgrid Group and have reviewed the Statement during its development. The Statement has also been reviewed and approved by the respective Boards within the Ausgrid Group.

FY25 key achievements



Began Fair Supply modern slavery due diligence platform integration

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Developed a Modern Slavery High-Risk Protocol

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Embedded our modern slavery suppliers 'deep dives' program

[Page 20](#)



Conducted a mock modern slavery critical incidence workshop

[Page 22](#)



Redeveloped our internal modern slavery training

[Page 22](#)



Submitted a response to the Australian Anti-Slavery Commissioner's "Invitation for Input" on the 2025-2028 Strategic Plan

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Drafted a Modern Slavery Risk Management Framework

[Page 17](#)



About Ausgrid Group

Ausgrid Group is a group of partnerships and their subsidiaries (non-listed) that is jointly owned by IFM Investors (25.2%), APG Asset Management Group (16.8%), AustralianSuper (8.4%) and the State of New South Wales (NSW) (49.6%) (via the Electricity Retained Interest Corporation – Ausgrid or 'ERIC-A') under a long-term lease.

Ausgrid Group includes Ausgrid Asset Partnership and Ausgrid Operator Partnership (Ausgrid), and PLUS ES Partnership (PLUS ES), along with Aurora Property Partnership.

Our purpose

Making electricity accessible for all.

Our vision

Our vision is for our communities to have the power in a resilient, affordable and sustainable future.

Our values



Work safe,
live safe



Customer-focused



Commercially
minded



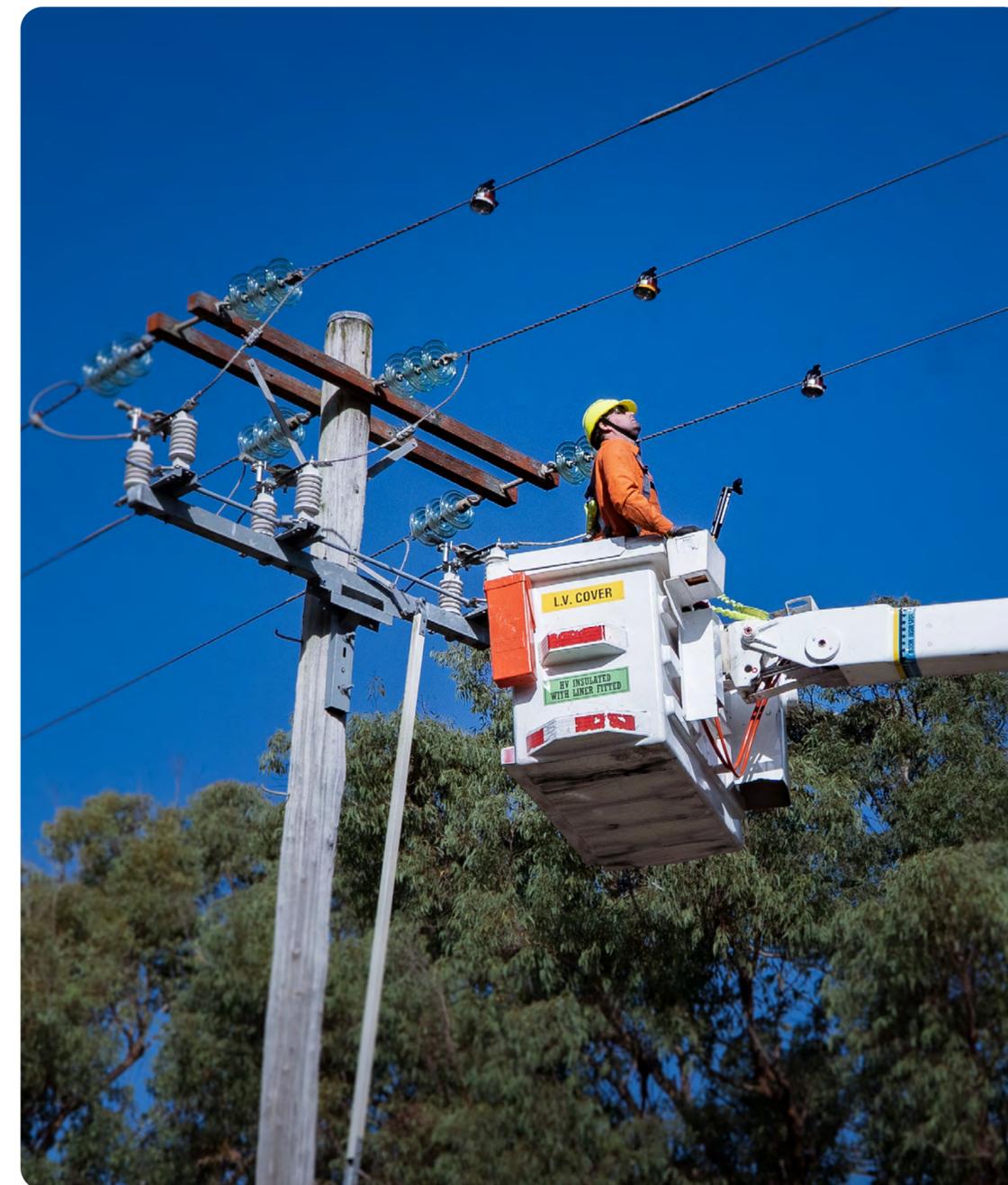
Collaborative



Honest and
accountable



Respect



About our operations

About Ausgrid

For over a century, Ausgrid and its predecessors have managed an extensive network of assets to deliver a reliable service for our communities. As the largest electricity distributor on Australia's east coast, Ausgrid supplies electricity to 1.8 million customers, including households, councils and businesses. We also support critical infrastructure and services like hospitals and schools.

Our network spans 22,275 square kilometres across Sydney, the Central Coast, and the Hunter Valley, comprising substations linked by high and low-voltage power lines, underground cables, tunnels and power poles. We perform a wide range of operations, from infrastructure construction and maintenance to customer connections, street lighting and telecommunications.

We are committed to a net zero future, so we are enabling the grid and our services to meet the community's growing electrification needs and make clean energy more accessible and affordable for all.

Ausgrid operates in New South Wales (NSW) in Australia. Our head office is in Sydney, NSW on Gadigal Land.

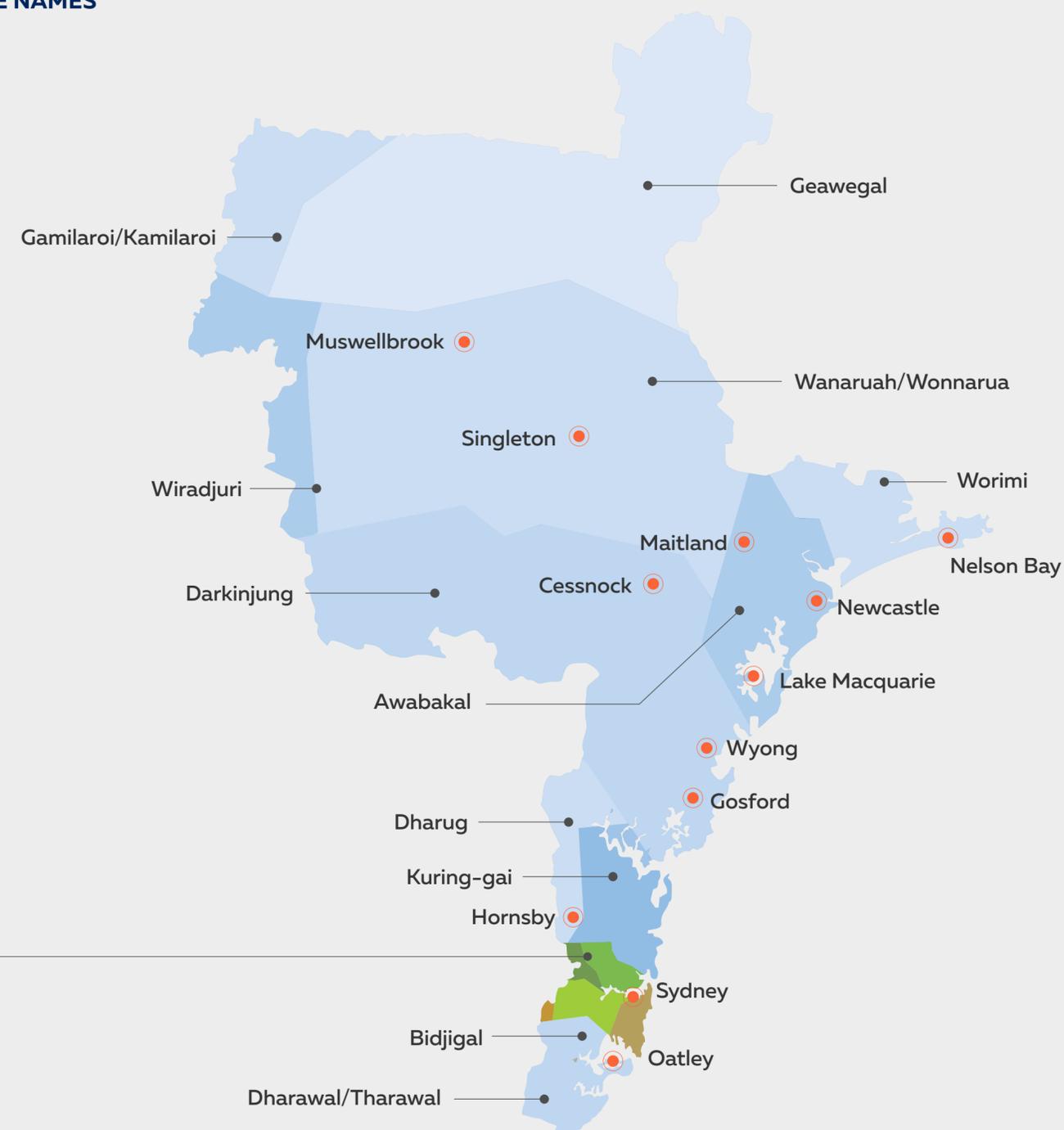
Our regulatory framework

Our network services in the National Electricity Market (NEM) are regulated by the Australian Energy Regulator (AER). Every five years, we submit a proposal to the AER outlining our plans (including expenditure and pricing) to serve our communities for the five years ahead.

The AER reviews and consults on our proposal to ensure it reflects the services our customers value at the lowest sustainable cost. This process is known as a 'Regulatory Reset'. The most recent Regulatory Reset covers the period 2024-29 and the [AER's final decision](#) was delivered in April 2024. It is publicly available on their website.

AUSGRID'S NETWORK AREA, WITH INDIGENOUS PLACE NAMES

● Depot locations



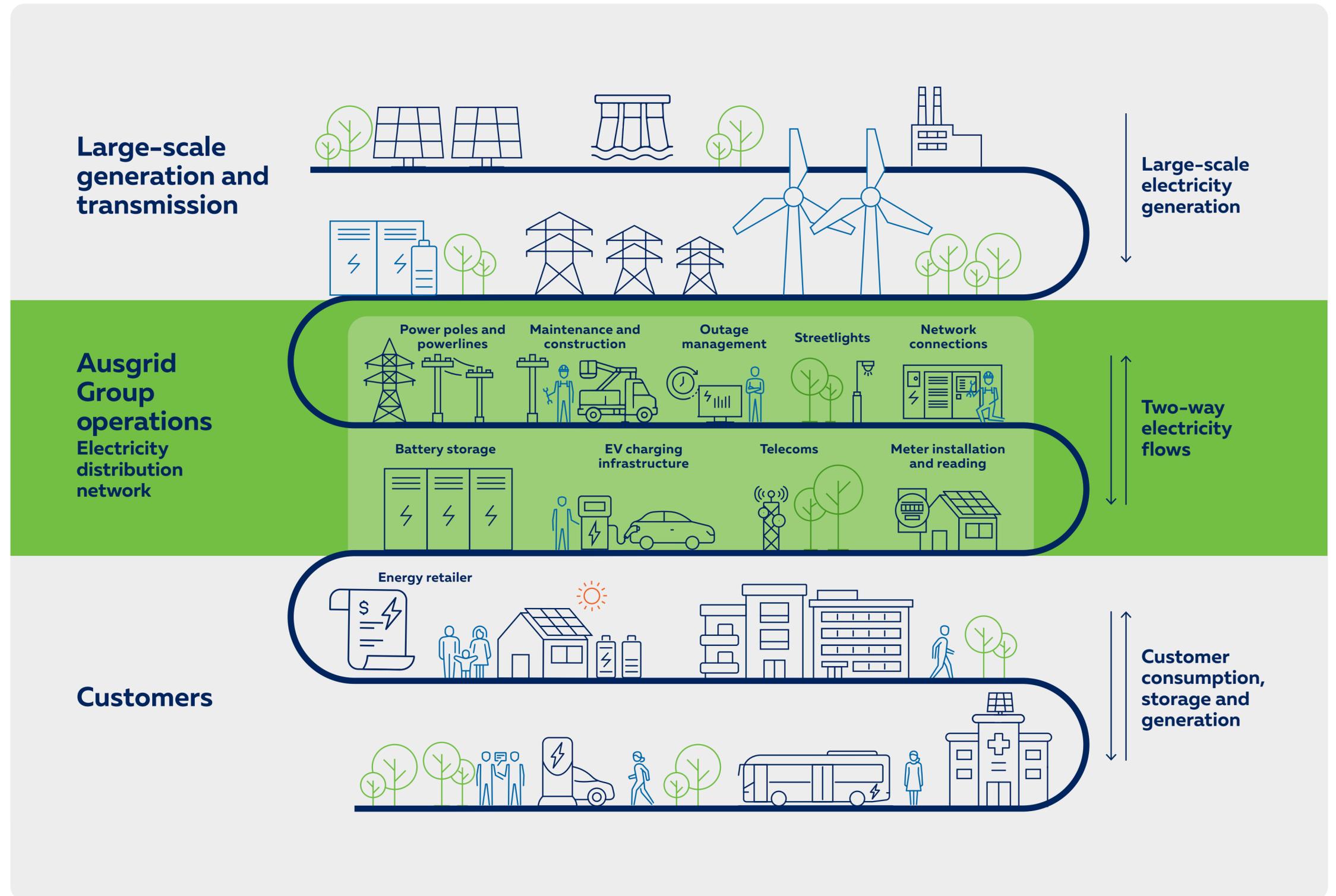
Ausgrid Group value chain

We are committed to working across the energy value chain to find faster, fairer and more affordable ways to deliver the energy transition.

Ausgrid is responsible for distributing electricity to 1.8 million customers in Sydney, the Central Coast, and the Hunter Valley. The electricity from large-scale electricity generation enters our network through the transmission network. This generation is increasingly from renewable sources such as wind and solar farms, hydroelectric dams, and grid-scale batteries, as well as from traditional sources such as coal plants and gas turbines. We then ensure it gets safely to our customers to power the economy and their homes and businesses. As the energy landscape changes, we have a key role in orchestrating and navigating this complex energy transition.

We partner with a range of companies to support and empower customers, including energy retailers. The retailers maintain the direct commercial relationships with customers and manage billing, including Ausgrid network costs. However, we also engage directly with customers to ensure they have a safe, reliable, and resilient supply of electricity, including the process to connect to our network and restoring services in the event of an outage.

We are also unlocking the ability for our customers to electrify and share the power they generate and store through their own customer energy resources, such as rooftop solar and batteries, back to the grid.



About PLUS ES

Launched in late 2017, PLUS ES helps businesses in NSW, Queensland, South Australia, Victoria, Australian Capital Territory and Tasmania to optimise energy consumption through advanced data delivery and end-to-end energy infrastructure solutions.

PLUS ES provides expertise and infrastructure services for contestable metering, grid connections, EV charging installation, large scale battery energy storage design and construction, and telecommunications industries in Australia.

PLUS ES is ring-fenced from the regulated Ausgrid distribution network business.¹

PLUS ES' head office is in Sydney, NSW on Gadigal Land.

For more information on Ausgrid Group and our strategy please see our [FY25 Business and Sustainability Review](#).

¹ Ring-fencing refers to the separation of the regulated and competitive business activities of an electricity distribution network service provider.



Metering Services

Provides advanced metering solutions to residential, embedded network, commercial, industrial, and high-voltage customers. It offers dynamic load management, sub-metering, and data insight services.



Energy Infrastructure

Provides services to design, build, own and operate electrical infrastructure including battery storage and electric vehicle charging.



Telco Infrastructure

Provides services to design, build, own and operate telecommunication infrastructure including telco towers, DWDM, and existing and new dark fibre connectivity to support network expansion.



Smart Cities

Delivering infrastructure and technology solutions for communities, building safer, greener and smarter communities.





Our workforce

In FY25, Ausgrid Group had 3,182 employees (644 female, 2,532 male and 6 other). We are proud that nearly two thirds of our workforce have been with our business for more than 10 years. As well as retaining top talent, we continued to build our workforce with 233 new starters this year, including 10 graduates and 50 apprentices.

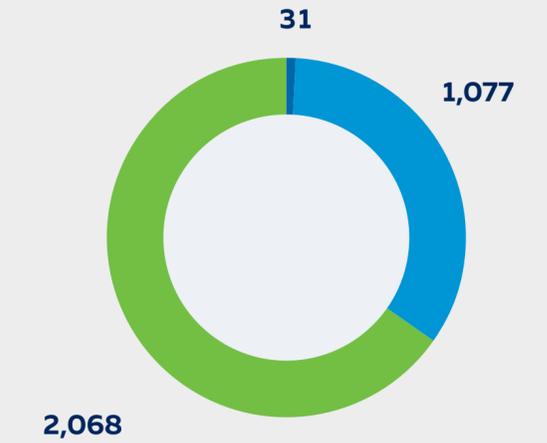
Our employees are both field-based (1,266) and office-based (1,916) and work across our operations in the locations shown on the right.

Respecting freedom of association

Ausgrid Group fully supports the right to freedom of association. In FY25, 89.5% of Ausgrid employees were employed under the Enterprise Agreement.

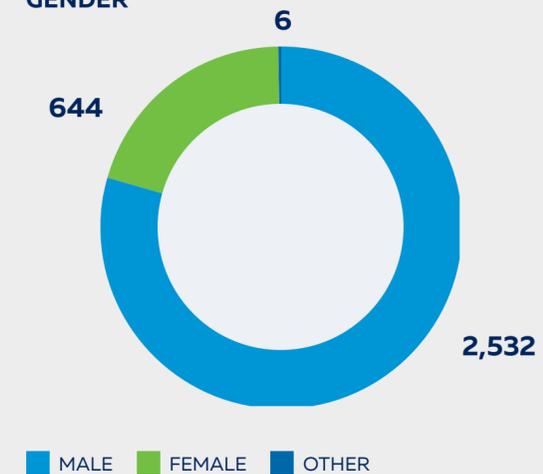
Protected industrial action took place in the second half of 2024 as employees and unions put forward claims for the new Enterprise Agreement. A resolution was reached in December 2024, when 82% of eligible employees voted to accept it and the Fair Work Commission ratified the new Agreement.

LOCATIONS



- HUNTER AND CENTRAL COAST, NSW
- SYDNEY, NSW
- OTHER LOCATIONS

GENDER



- MALE
- FEMALE
- OTHER

233
new starters

Including:

10
graduates

50
apprentices

Our supply chain

To support our significant operations, a global supply chain is utilised to provide the components and services required from domestic and international suppliers.

Ausgrid Group's international supply chain covers Europe, North and South America, Asia, and the Middle East. Many procured goods and services have complex supply chains containing multiple suppliers and manufacturers (including from overseas) providing the raw commodities, components, and services to produce the end product or service.

FY25 Ausgrid Group Procurement Footprint

Ausgrid Group

1,542
suppliers

\$1,020m
spent on goods and services

Ausgrid

1,447
suppliers

\$814m
spent on goods and services

PLUS ES

95
suppliers

\$206m
spent on goods and services

Key suppliers (suppliers with a current contract and spend greater than \$500,000)

138 suppliers

\$571m spent

29 categories of goods and services

19 countries

Our modern slavery governance

Ausgrid Group has robust governance in place to oversee our modern slavery program, drawing on input from key subject matter experts and relevant functional teams throughout the year.

There is a core Modern Slavery Working Group made up of members of the Procurement and Sustainability teams who have joint responsibility for implementing our Modern Slavery Roadmap.

Other Business Units and subject matter experts are engaged through the year on key modern slavery related activities when relevant to their roles and functions. The following diagram sets out our modern slavery governance.



Our approach to managing modern slavery risk

Ausgrid Group applies the Act’s definition of modern slavery. Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

Over the past six years, we have progressively strengthened our approach to managing modern slavery risks. Since the publication of our inaugural Modern Slavery Statement in FY20, we have established a strong foundation through the implementation of robust policies and procedures, targeted training, engagement with peers and suppliers, and the continuous enhancement of our approach to risk management.

We are committed to deepening our understanding, increasing our organisational maturity, and continuously improving our response to the risks of modern slavery in our operations and supply chain.

In particular, we recognise the complex challenges associated with addressing modern slavery risks within supply chains supporting the clean energy transition – a sector in which we play a pivotal role. We will continue to prioritise working collaboratively with government, industry peers, and key suppliers to better understand and mitigate these risks.

FY20 Commenced our modern slavery response

- External Partner Code of Conduct and Sustainable Procurement Policy published in an earlier reporting period
- Supplier risk assessments updated to address and manage modern slavery risks
- Legal Agreement Templates updated with provisions to comply with modern slavery legislation

FY21 Raised awareness and understanding of modern slavery

- Launched our online modern slavery training module for employees
- Updated our External Partner Code of Conduct to include our Whistleblower hotline details
- Improved governance with oversight from the Procurement Community of Practice
- Improved our supplier risk assessments with deeper analysis of country and industry risks

FY22 Put in place a strategic action plan

- Developed a three-year executive sponsored Modern Slavery Roadmap
- Published a Forced and Bonded Labour Position Statement
- Implemented a modern slavery due diligence tool

FY23 Focused on capacity building

- Appointed a dedicated Sustainability Officer to deliver our modern slavery program
- Established our Modern Slavery Working Group
- Conducted Supplier Deep Dive pilot

FY24 Strengthened our policies and processes

- Published a Human Rights Policy and shared it with our suppliers
- Published a Modern Slavery Remediation Guideline
- Published Cobalt Mining and Modern Slavery Position Statement
- Onboarded our Procurement Strategy and Risk team
- Undertook our Supplier Deep Dive program
- Launched an internal modern slavery awareness campaign

FY25 Advanced our commitment through collaboration and engagement

- Submitted a response to the Australian Anti-Slavery Commissioner’s “Invitation for Input” on the 2025–2028 Strategic Plan
- Joined the Clean Energy Council Modern Slavery Working Group
- Onboarded the Fair Supply modern slavery due diligence platform
- Developed a Modern Slavery Risk Management Framework for use by our Category Managers during supplier screening
- Developed a Modern Slavery High-Risk Protocol for procurement activities where a high risk of modern slavery has been identified
- Extended our Supplier Deep Dive Program to incorporate follow-up workshops addressing identified gap topics



Risks in our operations

The risk of modern slavery occurring within Ausgrid Group's direct workforce is considered very low. This is because all employees are engaged under either the Ausgrid Enterprise Agreement or individual employment contracts, which provide fair wages, working conditions, and legal protections.

Furthermore, employees have the freedom to associate with relevant unions, reinforcing their rights to representation and collective bargaining.

Ausgrid Group also engages workers through contracted service arrangements to provide various services. An assessment of these services highlighted four sectors which have an elevated level of modern slavery risk:

- Security
- Cleaning
- Gardening and plant maintenance
- Property maintenance

Workers in these industries are more likely to be vulnerable to the risk of modern slavery due to their employment and visa arrangements, language skills and the unskilled nature of their work. We have modern slavery specific training for this cohort of workers, which includes information on how to ask for help via our Whistleblower program.



CASE STUDY

Modern slavery collaboration workshops with our security contractor

In June 2025, our Sustainability and Procurement teams facilitated two modern slavery collaboration workshops in partnership with our contracted security provider.

These sessions were designed to enhance our collective understanding of modern slavery risks, share our learnings and build trust. The workshops were well attended from both organisations, with shared senior leadership support and active participation from representatives across Security, Legal, Sustainability, Compliance and Project teams.

The second workshop specifically focused on the practical implementation of remediation actions in the event of a reported incident. Ausgrid Group presented the methodology and research underpinning the development of our Modern Slavery Remediation Guideline, promoting a robust dialogue on challenges and best practice to appropriately remediate any harm.

Key outcomes included greater awareness of vulnerability indicators, improved understanding of the United Nations Guiding Principles on Business and Human Rights (UNGP's) Continuum of Involvement, strengthened trust, and a shared commitment to addressing modern slavery incidents.

Annual supply chain risk assessment

The complex nature of our supply chain means there is a risk that Ausgrid Group may be indirectly linked to modern slavery.

On an annual basis Ausgrid Group assesses our key suppliers (contracted suppliers with spend greater than \$500,000) for modern slavery risks using the Walk Free Global Slavery Index (GSI) which provides national estimates of modern slavery for 160 countries. The outcome of this assessment details the modern slavery risks by countries in which our key suppliers operate and which categories of spend (industry) are at greater risk due to the countries in which they are manufactured.

Supply chain risks by location

Using the Walk Free GSI we identified three categories (high, medium, low) of country risk across our key suppliers.

Ausgrid Group country risk for key suppliers

High risk

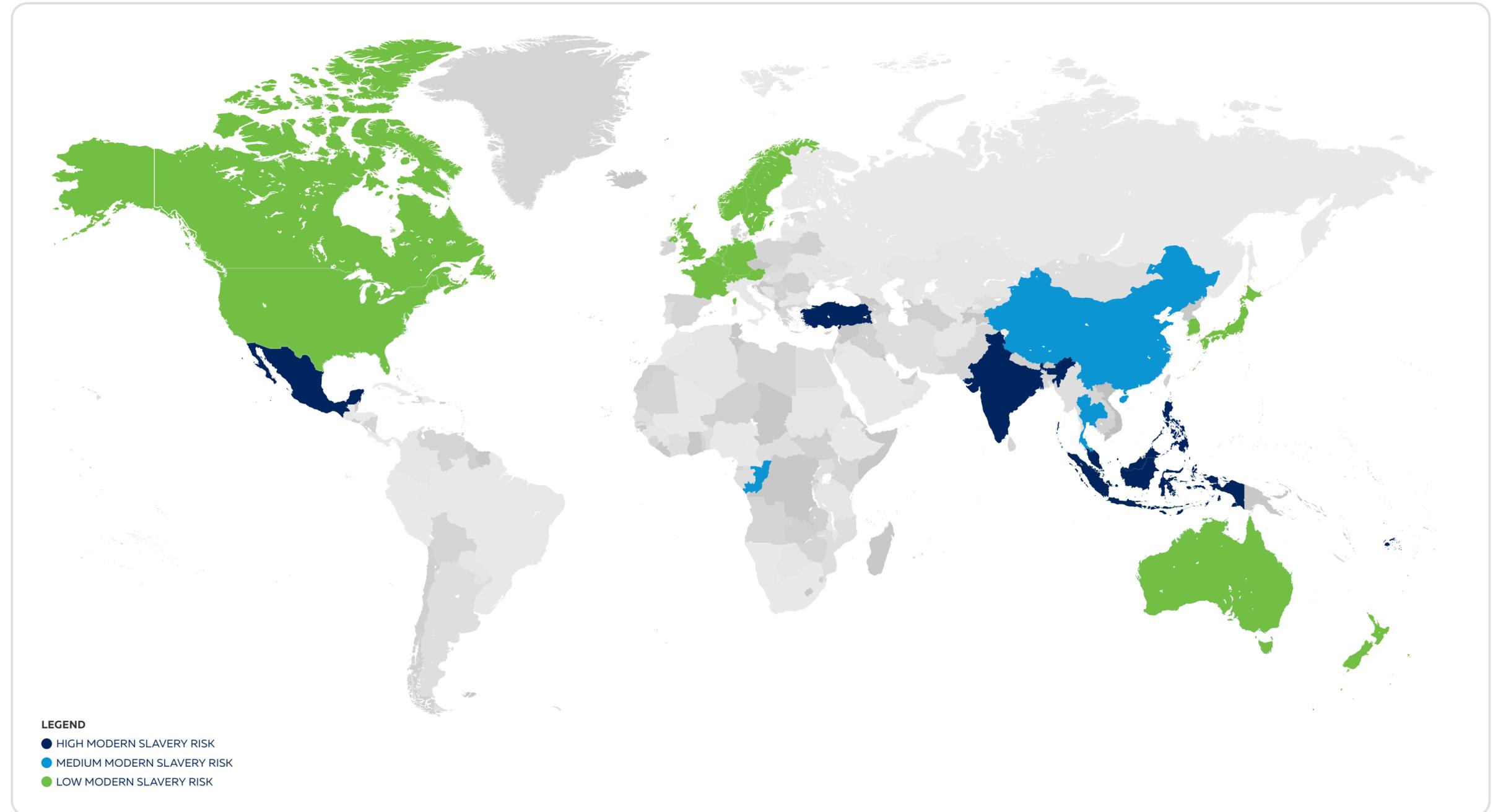
- Turkey
- India
- Philippines
- Indonesia
- Mexico
- Malaysia
- Fiji

Medium risk

- Thailand
- Democratic Republic of Congo
- China

Low risk

- South Korea
- United States of America
- France
- Singapore
- Canada
- United Kingdom
- Australia
- New Zealand
- Japan
- Germany
- Netherlands
- Sweden



Supply chain risks by spend category (industry)

The categories of goods or services in the table on the right have been identified as higher risk due to their country of origin and/or the international recognised modern slavery risks associated with those categories.

THE AUSGRID'S HIGHER RISK CATEGORIES ARE IDENTIFIED AS:



Electrical components and equipment – such as cables, switchgear, and control systems from across 10 countries including Turkey, Indonesia, Malaysia and Thailand.



Construction and engineering – such as purchased engineering consultancy, construction services, metering and telco services from across nine countries including China, India and Indonesia.



Research and consulting services – such as purchased professional services and training and development from across six countries including India and the United States of America.



Data processing and outsourced services – such as fleet management, business process outsourcing (BPO) and light detection and ranging (LiDAR) and photography services from across two countries including India.



Apparel retail – such as uniforms and clothing from across three countries including Indonesia.



IT consulting and other services – such as purchased IT and professional services and IT software from across six countries including India and Philippines.



Fleet¹ – such as passenger vehicles from across multiple countries including China, South Korea and Japan.



Electronic equipment and instruments – such as smart meters and related metering technology from across three countries including China and Malaysia.

¹ Fleet has been categorised as higher risk in addition to the categories identified through our annual risk assessment process due to academic, media and third-party reporting, for example, 'Driving force: automotive supply chains and forced labour in the Uyghur region', Sheffield Hallam University, Helena Kennedy Centre for International Justice.

Additional supply chain risk assessments

Throughout the year Ausgrid Group has undertaken additional risk assessments, as needed, in response to emerging risks or supplier engagements and assessments. These assessments reflect the complexity of our supply chain and the broad range and varying depth of modern slavery risk data available:

Supply chain risk assessment system

During FY25, we began to integrate Fair Supply's modern slavery due diligence platform (**Fair Supply platform**) into our risk management assessment processes, to enhance our visibility and management of modern slavery risks across our supply chain. The Fair Supply platform leverages industry economic data to assess risk across supplier industries and countries, enabling analysis of suppliers beyond tier one within our supply chain. It also allows Ausgrid Group to request our suppliers to complete modern slavery specific questionnaires.

Modern Slavery Risk Management framework

Drafted a new Modern Slavery Risk Management framework which builds on existing policies and procedures by introducing a more systematic and proactive approach to managing modern slavery risks. This framework will be implemented in FY26.

Supplier desktop analysis

We conducted detailed desktop analyses of six suppliers. This analysis used a broad range of publicly available data including academic papers and research, media reporting, supplier websites, and various international sanctions and compliance watchlists.

Additionally, Ausgrid Group commissioned Fair Supply to provide desktop due diligence assessments for procurement of goods or services that could have a higher risk of modern slavery. Insights from these reports guided procurement activities and shaped our approach to supplier deep dive engagements.

Tender ESG schedules

Ausgrid Group's tender assessment processes include an assessment of suppliers' modern slavery, social impact and sustainability practices and policies.

Assessing and mitigating higher risk products and services

Ausgrid Group's strategic goals to drive electrification and support the decarbonisation of the energy system will require different types of infrastructure, supply chains and contracted services. As we seek to play our role in accelerating the clean energy transition, such as by installing and operating battery energy storage systems or electrifying our fleet, we must also navigate heightened modern slavery risks embedded in global supply chains, especially in sectors linked to clean energy technologies.

For example, in order to address climate change and to progress the energy transition, governments are encouraging electric vehicle (EV) adoption, including by providing incentives. However, the supply chains used to manufacture EVs often have a high risk of modern slavery, and some EV manufacturers are not willing to engage meaningfully as part of due diligence efforts or to address the issue.

To determine the most appropriate response to high-risk procurement activities, Ausgrid Group engaged Pillar Two, a specialist human rights consultancy, to collaborate with key internal stakeholders across Procurement, Sustainability, Legal, Risk and Compliance, and Operations and developed a decision-making protocol (**Modern Slavery High Risk Protocol**) to ensure:

- internal and external expectations regarding modern slavery risks are appropriately addressed;
- mitigation measures, as well as the limitations of those controls, are identified and clearly documented; and
- procurement decisions carefully balance the extent to which a good or service is critical to strategic goals or operational requirements with modern slavery risks and available mitigation strategies.

This Modern Slavery High Risk Protocol will be implemented in FY26 for ongoing procurement activities assessed as strategically significant and as having a high risk of modern slavery



CASE STUDY

Addressing modern slavery risks in electric vehicle procurement

To help meet our decarbonisation goals, Ausgrid Group has set a goal to electrify more of its fleet of vans, utes, cars and trucks by 2029.

There are significant modern slavery risks in EV supply chains, particularly due to China's dominance in manufacturing and mineral processing. While these risks exist for manufacturers of vehicles with internal combustion engines as well, EVs require extensive mineral inputs – such as lithium, cobalt, aluminium, and steel – many of which are processed in China, a country which has widely documented allegations of forced labour, especially in the Xinjiang Uyghur Autonomous Region (XUAR)¹.

In FY25, we applied the Modern Slavery High Risk Protocol to procurement of EVs for our fleet, as a test case. The Modern Slavery High Risk Protocol evaluated the EV suppliers for a range of light vehicles across three dimensions: risk context and how critical the procurement is, our leverage with the supplier and mitigation opportunities.

Ausgrid Group's approach balances our commitment to emissions reduction with our responsibility to manage human rights risks. We will continue to assess the risks in the EV supply chain and to work with industry partners and other stakeholders to advocate for collective action to address this issue.

¹ Driving Force: Automotive Supply Chains and Uyghur Forced Labor (December 2022) published by the Sheffield Hallam University Helena Kennedy Centre for International Justice.

Modern slavery policy and process framework

This table outlines the key policies and processes that support our approach to identifying, managing, and mitigating modern slavery risks. By clearly linking each policy to its relevance and implementation, we demonstrate how modern slavery considerations are embedded across our governance and operational practices.

Policy	Relevance to modern slavery	How we implement this Policy
Human Rights Policy	Sets out Ausgrid's commitment to respecting and supporting human rights across our operations and supply chain; and expectations about how we conduct ourselves and make decisions to support this commitment.	<ul style="list-style-type: none"> This policy was published in 2023. It is available on our external Ausgrid websites and our internal employee intranets. The policy encourages employees and third parties to report any Human Rights concerns via our Whistleblower program.
Whistleblower Policy	Sets out Ausgrid's commitment to implement a whistleblower protection program to help detect corrupt, illegal, or other matters of misconduct (including relating to suspected or actual modern slavery instances).	<ul style="list-style-type: none"> This policy was refreshed in June 2024. It is available on our external Ausgrid websites and our internal employee intranets. Our whistleblower program is regularly communicated to our employees and third parties to encourage reporting and raise awareness.
External Partner Code of Conduct	Communicates Ausgrid's expectations to our external partners and their supply chains in providing goods and services. It explicitly requires them to identify and mitigate risks and eliminate any form of modern slavery.	<ul style="list-style-type: none"> All new suppliers are provided with this Code and are requested to provide it to their subcontractors. New supplier assessments require mandatory adherence to this Code. It is available on our external Ausgrid websites and our internal employee intranets.
Code of Conduct	Our Code of Conduct describes how all our workers are responsible for their own behaviour and are expected to conduct themselves including: <ul style="list-style-type: none"> Complying with the law (including the Criminal Code 1995 (Cth) and various international agreements which relate to modern slavery). Complying with Ausgrid's policies, procedures, rules, and guidelines. Maintaining a safe work environment. Reporting serious concerns (including relating to suspected or actual modern slavery instances). 	<ul style="list-style-type: none"> This policy was refreshed in February 2024. It is available on our external Ausgrid websites and our internal employee intranets. All employees must complete Code of Conduct training on an annual basis. Employee performance appraisals include assessment against criteria within this Code.
Sustainable Procurement Policy	Sets out Ausgrid's considerations and accountabilities for sustainable procurement of externally sourced goods and services in a way that has the most positive environmental, social and economic impacts possible over the entire life cycle.	<ul style="list-style-type: none"> Ausgrid's Sustainable Procurement Policy guides day-to-day procurement activities conducted across the organisation. The policy enables the sourcing and purchase of technically confirming goods and services, while achieving the best value for money, minimising risk and ensuring positive outcomes for the environment and the community.
Forced Labour and Debt Bondage Position Statement	Sets out Ausgrid's approach to addressing forced labour and debt bondage.	<ul style="list-style-type: none"> In 2024 this policy was sent to our key suppliers requesting they familiarise themselves and ensure their sub-contractors are made aware. It is available on our external Ausgrid websites and our internal employee intranets.
Cobalt and Modern Slavery Position Statement	Sets out Ausgrid's commitment to develop our capability to identify and mitigate against the risks of cobalt mining in our supply chain and remediate against the adverse impacts of this practice to the extent that doing so is within our control and influence.	<ul style="list-style-type: none"> It is available on our external Ausgrid websites and our internal employee intranets.
Ausgrid Modern Slavery Remediation Guideline	Sets out Ausgrid's remediation guidance when we identify or become aware of an actual incident (including claims) of modern slavery either in our business or supply chain and their operations.	<ul style="list-style-type: none"> This guideline was published in 2024. It is available on our internal employee intranets.

Governance and oversight

Strong governance, supported by robust policies and procedures, is important for managing modern slavery risk as it ensures accountability, sets clear expectations, and embeds consistent practices across our organisation and supply chain.

GOVERNANCE, POLICY OR PROCEDURE

Governance and oversight

Modern Slavery Policy and Process Framework

HOW THIS ADDRESSES MODERN SLAVERY RISKS

Our Modern Slavery Working Group meets monthly to assess our progress, ensures ownership of responsibilities, informs decision-making, and monitors risk mitigation efforts.

Our robust Human Rights Policy framework (see [page 18](#)) embeds human rights protections across all levels of Ausgrid Group and establishes clear expectations for ethical conduct, transparency, and accountability.

PROGRESS DURING FY25

The Modern Slavery Working Group with representatives from Sustainability and Procurement met monthly.

This year we tested our Modern Slavery Remediation Guideline by running a mock trial (see [page 22](#)).

EFFECTIVENESS MEASURES FOR FY26

Continue monthly meetings. Implement formal reporting mechanism(s) for key stakeholders and relevant Committees.

Engage a modern slavery facilitator to deliver a workshop grounded in real-life experiences and remediation case study.

Due diligence

Due diligence is critical to identify potential risks of modern slavery and implement controls to prevent and mitigate exploitation within the supply chain.

DUE DILIGENCE PROCESS

Supplier monitoring and evaluation

Modern slavery supplier deep dives

HOW THIS ADDRESSES MODERN SLAVERY RISKS

Throughout the year we completed ongoing supplier risk assessments as part of our tender review processes, implemented modern slavery contract clauses, and had ongoing supplier engagement.

Our supplier deep dives are a two-step process involving a desktop review of publicly available information on a supplier, followed by direct engagement with that supplier to discuss modern slavery challenges and share best practices. These collaborative conversations fostered mutual learning and, in some cases, led to recommendations for improving modern slavery outcomes.

PROGRESS DURING FY25

Developed a Modern Slavery High-Risk Protocol to determine the most appropriate response to high-risk procurement activities (see [page 17](#)).

Developed a new Modern Slavery Risk Management Framework.

We conducted five supplier deep dives with key suppliers.

Additionally, we had one follow up workshop with our security contractor (see [page 14](#)).

EFFECTIVENESS MEASURES FOR FY26

Operationalise the Modern Slavery High-Risk Protocol.

Operationalise the Modern Slavery Risk Management Framework.

Conduct five supplier deep dives.

Training

Our training on modern slavery is intended to equip employees with the knowledge to identify warning signs, understand their responsibilities, and take appropriate action to prevent and address potential issues.

TRAINING PROCESS

Training programs

HOW THIS ADDRESSES MODERN SLAVERY RISKS

We have three training programs which are relevant to our modern slavery program and help to strengthen employee modern slavery awareness, accountability and ability to identify and address modern slavery risks across our operations and supply chain.

PROGRESS DURING FY25

We redeveloped the Modern Slavery Introduction training module to ensure the content and messaging were tailored specifically to our organisational context.

(See below for further information).

EFFECTIVENESS MEASURES FOR FY26

Increase completion for the Modern Slavery Introduction training module to greater than 90%.

TRAINING

Modern Slavery Introduction training module

RELEVANCE TO MODERN SLAVERY

This training provides detailed information on what modern slavery is and how it applies to our supply chain and operations. It is compulsory for all new employees.

FY25 RATE OF COMPLETION

87% of all new employees.

Code of Conduct training

This training includes information on our Whistleblower program and must be completed annually by all employees.

98% of all new employees.

Procurement Awareness training

This training includes information on our External Code of Conduct and modern slavery obligations. It must be completed by all new employees who have procurement function responsibilities.

96% of new employees with procurement responsibilities.

Modern slavery introductory training

Ausgrid Group updated its Modern Slavery Introduction training to ensure it is more contextually relevant to our operations and workforce. The module, which is required for all new starters, illustrates the different forms of slavery including real-world case studies, and specific risks relevant to our operations and supply chain.

It illustrates the various forms of exploitation, outlines hidden indicators that may signal vulnerability, and details the appropriate reporting mechanisms, including Whistleblower channels. This training is essential to equipping all employees with the knowledge and tools to identify, prevent, and respond effectively to modern slavery risks within our operations and supply chain.



CASE STUDY

Modern slavery mock critical incident workshop

In December 2024, Ausgrid Group conducted a mock critical incident workshop to test the effectiveness of its Modern Slavery Remediation Guideline and build internal capability to respond to real-world incidents.

The workshop was attended by representatives from Procurement, Legal, Sustainability, Contract Delivery, Security, People, Property and Media teams, including senior stakeholders responsible for supplier relationships and compliance. The session was designed to simulate a real life scenario of an incidence of modern slavery and assess our readiness to respond in line with our legal obligations and ethical commitments.

The fictional case study centred on a migrant worker, who disclosed exploitative conditions while employed as a cleaning subcontractor of a cleaning services provider. Participants applied our Modern Slavery Remediation Guideline to assess the incident and develop a remediation plan across four key dimensions: complainant safety, legal obligations, supplier relationship, and effective and timely remediation. The workshop concluded with a debrief, consensus that the Modern Slavery Remediation Guideline was fit for purpose but required minor updates to improve clarity and usability and a commitment to repeat the exercise every two years.

Engagement and collaboration

It is important to work with industry peers, government and other stakeholders to have greater collective leverage so that we can have influence beyond own operations and supply chain.

Recognising that the landscape of modern slavery risks is dynamic and constantly evolving, we also seek out contemporary insights, emerging trends, and best practice approaches to inform our modern slavery program. This includes collaboration with industry bodies, engaging the services of modern slavery expert consultants and participation in sector-wide initiatives and workshops.

To the right are some of the engagements we undertook during FY25.

ENGAGEMENT PROCESS

Industry collaboration

Research and education

HOW THIS ADDRESSES MODERN SLAVERY RISKS

We actively look for opportunities to share insights, learn about best practices and understand complex supply chain challenges. Through this our aim is to improve transparency, strengthen due diligence processes, and influence systemic change across sectors

Throughout the year, we actively engaged with credible modern slavery research, media reporting, and industry forums to inform our analysis, risk assessments and decision making. This commitment to continuous learning ensures our activities are grounded in current data and aligned with evolving best practice standards. We conducted five supplier deep dives with key suppliers.

PROGRESS DURING FY25

Submitted a response to the Australian Anti-Slavery Commissioner’s “Invitation for Input” on the 2025–2028 Strategic Plan and participated in subsequent consultation sessions (see below on [page 24](#)).

Joined the Clean Energy Council Modern Slavery Working Group.

Engaged with industry peers and shared our learnings.

Regularly attended the OASC Anti-Slavery Forums and actively considered guidance published by the NSW Anti-Slavery Commissioner.

Read and maintained active awareness of new research and reports on modern slavery risks.

EFFECTIVENESS MEASURES FOR FY26

Work with the Clean Energy Council Modern Slavery Working Group to review the Office of the NSW Anti-Slavery Commissioner’s (OASC) proposed “Code of Practice on managing modern slavery risks in renewable energy value-chains.”

Continue to identify and collaborate with industry peers on shared modern slavery areas of concern.

Attend the OASC forums.

Ongoing review of modern slavery research and reports.



Response to the Australian Anti-Slavery Commissioner's "Invitation for Input" on the 2025–2028 Strategic Plan.

In April 2025, Ausgrid Group submitted a formal response to the Australian Anti-Slavery Commissioner's "Invitation for Input" on the 2025–2028 Strategic Plan. Our submission emphasised four key priorities:

- fostering cross-sector collaboration to address modern slavery;
- promoting compliance with the Act;
- supporting Australian entities in managing modern slavery risks across their operations and supply chains; and
- advancing research to drive continuous improvement.

These priorities reflect Ausgrid Group's own experience in managing a complex global supply chain and our ongoing efforts to strengthen modern slavery risk assessment and mitigation practices.

Ausgrid Group participated in the follow-up consultation sessions with the Australian Anti-Slavery Commissioner to discuss draft priorities for the 2025–2028 Strategic Plan. We welcome further engagement opportunities on the forthcoming 2025–2028 Strategic Plan as a significant resource for shaping the national approach to modern slavery.

Integrating External Expertise

Integrating external expertise into our risk assessments, remediation, and governance frameworks, demonstrates our commitment to maintaining a robust and responsive program that aligns with stakeholder expectations and legislative obligations under the Act.

Some of the modern slavery resources we used through the year are:

- **Walk Free Foundation:** Ausgrid Group applies the 2025 Global Slavery Index in our supply chain risk assessments.
- **United Nations (UN) Human Rights Council:** Ausgrid Group applies the United Nations Guiding Principles on Business and Human Rights (UNGPs) when developing our guidelines and policies.
- **OASC:** Ausgrid Group applies the OASC Inherent Risk Identification Tool (IRIT) ver 2.0 in our supply chain risk assessments and relies on the Guidance on Reasonable Steps, and associated publications, to provide best practice guidance in the continual improvement of our risk management practices.

Seeking assistance

If you have concerns about modern slavery or broader human rights issues relating to the Ausgrid Group's supply chain or operations, you can contact us using our Whistleblower hotlines and can choose to remain anonymous.

Individuals covered by the Whistleblower Policy will be protected against detriment or threats of detriment. Whistleblower disclosures must be made as set out below:

For Ausgrid Matters

Online 24/7 reporting at yourcall.com.au/report (enter "AUSGRID" as org. ID)

Call Your Call hotline number: 1800 607 206

Email ausgrid@yourcall.com.au

Mail Locked Mail Bag 7777, Malvern VIC 3144

For PLUS ES Matters

Online 24/7 reporting at yourcall.com.au/report (enter "PLUSES" as org. ID)

Call Your Call hotline number: 1800 607 197

Email pluses@yourcall.com.au

Mail Locked Mail Bag 7777, Malvern VIC 3144



Appendix 1: Mandatory criteria

The following table outlines how this statement addresses each of the mandatory reporting criteria under section 16 of the *Modern Slavery Act 2018* (Cth), providing a reference to the relevant sections within the document.

Modern Slavery Act Mandatory Criteria	FY25 Ausgrid Group Modern Slavery Statement	Page
a. Identify the reporting entity	Introduction	<u>2</u>
b. Describe the reporting entity's structure, operations, and supply chains	Our structure, operations, and supply chain	<u>6</u>
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	Our modern slavery risks	<u>13</u>
d. Describe the actions taken by the reporting entity, and any entities it owns or controls, to assess and address these risks, including due diligence and remediation processes	Our actions to address modern slavery risks	<u>18</u>
e. Describe how the reporting entity assesses the effectiveness of these actions	Our actions to address modern slavery risks	<u>18</u>
f. Describe the process of consultation with any entities the reporting entity owns or controls	Introduction	<u>2</u>
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant	Seeking Assistance Appendices	<u>24</u> <u>25-27</u>

Appendix 2: List of controlled entities

The below table identifies the entities that are reporting entities for the purposes of the *Modern Slavery Act 2018* (Cth).

Ausgrid and Ausgrid Assets Structure	PLUS ES Structure
<p>Ausgrid is a partnership carried on under that name by:</p> <ol style="list-style-type: none"> Blue Op Partner Pty Ltd (ACN 615 217 500) as trustee for Blue Op Partner Trust; ERIC Alpha Operator Corporation 1 Pty Ltd (ACN 612 975 096) as trustee for ERIC Alpha Operator Trust 1; ERIC Alpha Operator Corporation 2 Pty Ltd (ACN 612 975 121) as trustee for ERIC Alpha Operator Trust 2; ERIC Alpha Operator Corporation 3 Pty Ltd (ACN 612 975 185) as trustee for ERIC Alpha Operator Trust 3; and ERIC Alpha Operator Corporation 4 Pty Ltd (ACN 612 975 210) as trustee for ERIC Alpha Operator Trust 4. 	<p>PLUS ES Partnership (ABN 30 179 420 673), trading as PLUS ES, is a partnership carried on under that name by:</p> <ol style="list-style-type: none"> Blue PES Partner Pty Ltd (ACN 622 175 428) as trustee for the Blue PES Partner Trust; ERIC Alpha AUP Corporation 1 Pty Ltd (ACN 621 524 374) as trustee for ERIC Alpha AUP Trust 1; ERIC Alpha AUP Corporation 2 Pty Ltd (ACN 621 524 454) as trustee for ERIC Alpha AUP Trust 2; ERIC Alpha AUP Corporation 3 Pty Ltd (ACN 621 524 525) as trustee for ERIC Alpha AUP Trust 3; and ERIC Alpha AUP Corporation 4 Pty Ltd (ACN 621 524 605) as trustee for ERIC Alpha AUP Trust 4
<p>Ausgrid Assets is a partnership carried on under that name by:</p> <ol style="list-style-type: none"> Blue Asset Partner Pty Ltd (ACN 615 217 493) as trustee for Blue Asset Partner Trust; ERIC Alpha Asset Corporation 1 Pty Ltd (ACN 612 974 044) as trustee for ERIC Alpha Asset Trust 1; ERIC Alpha Asset Corporation 2 Pty Ltd (ACN 612 975 023) as trustee for ERIC Alpha Asset Trust 2; ERIC Alpha Asset Corporation 3 Pty Ltd (ACN 612 975 032) as trustee for ERIC Alpha Asset Trust 3; and ERIC Alpha Asset Corporation 4 Pty Ltd (ACN 612 975 078) as trustee for ERIC Alpha Asset Trust 4. 	
<p>Ausgrid Management is a subsidiary of Ausgrid, and Ausgrid Finance is a subsidiary of Ausgrid Assets. Ausgrid and Ausgrid Assets have effective control over their respective subsidiaries.</p>	
<p>Within the Ausgrid and Ausgrid Asset structures, the Ausgrid Members hold the following general responsibilities:</p>	
<ul style="list-style-type: none"> Ausgrid is the primary operating entity and is responsible for operating, maintaining, and building the electricity network and engaging with customers and suppliers for goods and services; Ausgrid Assets hold the electricity network assets on behalf of Ausgrid; Ausgrid Management is responsible for employing individuals who perform work on behalf of Ausgrid; and Ausgrid Finance is responsible for obtaining finance from external lenders on behalf of Ausgrid. 	
<p>A consortium comprising IFM Investors, AustralianSuper, and APG Asset Management holds a 50.4% partnership interest in Ausgrid, Ausgrid Assets and PLUS ES. The New South Wales (NSW) State Government, through various corporations established in accordance with the <i>Electricity Retained Interest Corporation Act 2015</i> (NSW), holds a 49.6% partnership interest in Ausgrid, Ausgrid Assets and PLUS ES.</p>	

Appendix 3: Other information about this Statement

For the purposes of the Act and this Statement, modern slavery means conduct which would constitute:

- a. an offence under Division 270 or 271 of the Criminal Code; or
- b. an offence under either of those Divisions if the conduct took place in Australia; or
- c. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Wired for good.

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