



# **Modern Slavery**

# **Statement**

## **Joint Statement**

Hydro Tasmania  
Entura  
Momentum Energy  
AETV

**FY2023/24**



# Chair's message

Hydro Tasmania prioritises the safety of our staff, communities and customers, both in Tasmania and around the world.

Ours is a complex business that works across many different sectors, from consulting and construction to power generation and retail. We seek to maintain high standards of corporate integrity across those activities.

In particular, we are committed to playing our part in combating modern slavery, in selecting the sources of our materials and the companies we engage with globally.

Over the last year, we have taken important steps to progress that commitment.

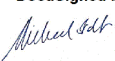
We have updated our sourcing and contracting procedures to manage modern slavery risks, developed a Supplier Code of Conduct that incorporates modern slavery provisions and expectations for Hydro Tasmania group suppliers, and collaborated with key industry groups.

We have also continued to improve Entura's Integrity Framework and sustainability screening, including through continual assessment of modern slavery risks in the renewable energy sector. We will continue to improve our understanding and mitigation of modern slavery.

Hydro Tasmania's board is proud to endorse this statement.

**Approval:** *This statement for Hydro-Electric Corporation was approved by the Board of Hydro- Electric Corporation on 4 December 2024.*

*This statement for AETV Pty Ltd and Momentum Energy Pty Ltd was approved by the Board of Hydro-Electric Corporation on 4 December 2024, as the parent entity of both of those wholly owned subsidiaries.*

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*Signed by Richard Bolt  
Chair - Hydro-Electric Corporation*

# Introduction

The term *modern slavery* is used to describe situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of 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.

This document satisfies Hydro Tasmania's reporting requirements under s14 of the *Modern Slavery Act 2018 (Cth)*. It provides an overview of Hydro Tasmania's approach to modern slavery, and the risks associated with its operations and supply chain for the financial year FY 2023/24.

## Who we are

Hydro-Electric Corporation, trading as Hydro Tasmania, was established under the *Hydro-Electric Corporation Act 1995 (Tas)*, is a Government Business Enterprise pursuant to the *Government Business Enterprises Act 1995 (Tas)* and is registered with ASIC as a registered Australian Body (ARBN 072 377148).

Hydro Tasmania, AETV Pty Ltd (AETV) and Momentum Energy Pty Ltd (Momentum Energy) are each deemed reporting entities under the *Modern Slavery Act 2018 (Cth)* and are included in this joint statement. In addition, Hydro Tasmania's power, water and renewable energy consulting arm, Entura is included in this joint statement.

**The reporting entities are referred to collectively in this statement as 'the Hydro Tasmania group'.**

The Hydro Tasmania executive team has ultimate responsibility for the reporting entities covered by this statement. This is because the boards of AETV and Momentum Energy are comprised of Hydro Tasmania Executives. The Hydro Tasmania Board has oversight of the whole Hydro Tasmania group.

For the purposes of this statement, the Hydro Tasmania group includes:

- Hydro-Electric Corporation (trading as Hydro Tasmania)
- Entura, a division of Hydro-Electric Corporation
- Momentum Energy Pty Ltd
- AETV Pty Ltd.

**Other wholly owned and controlled subsidiaries of Hydro-Electric Corporation not covered by this statement are:**

- Bell Bay Power Pty Ltd
- Bell Bay Three Pty Ltd
- Entura Hydro Tasmania India Pvt Ltd
- Heemskirk Holdings Pty Ltd
- Heemskirk Wind Farm Pty Ltd
- HT Wind Developments Pty Ltd
- HT Wind Operations Pty Ltd
- Hydro Tasmania Retail Pty Ltd
- Hydro Tasmania Consulting (Holding) Pty Ltd
- Hydro Tasmania Neusberg (Pty) Ltd
- Hydro Tasmania South Africa (Pty) Ltd
- RE Storage Project Holding Pty Ltd
- Tarraleah Village Holdings Pty Ltd
- Woolnorth Studland Bay Holdings Pty Ltd
- Lofty Ranges Power Pty Ltd.



# Preparation

The Hydro Tasmania group is a large employer in Tasmania, and between our reporting entities we have staff working in a broad range of disciplines including; engineering, scientific, project management, strategic planning, IT, financial, human resources, marketing, operational, corporate governance, retail call center and administrative staff.

To prepare this joint statement, Hydro Tasmania's Modern Slavery Working Group engaged with and consulted each of the reporting entities covered by this statement, to discuss specific suppliers and supply chain purchasing during the reporting period FY 2023/2024.

The Modern Slavery Statement is informed by Hydro Tasmania group's Code of Conduct, which recognises our obligation to comply with all legislation. In addition, our Sustainability Principles, Work Health and Safety Policy and Environmental Policy all work together to define the standard of ethical behaviour required across the business. They are supported by other internal procedures related to whistleblowing, fraud, corruption and risk management.









# Our operations and supply chains

**Hydro Tasmania is Australia's leading clean energy business and largest generator of renewable energy. The Hydro Tasmania group is made up of the four core businesses with 1,464 employees.**

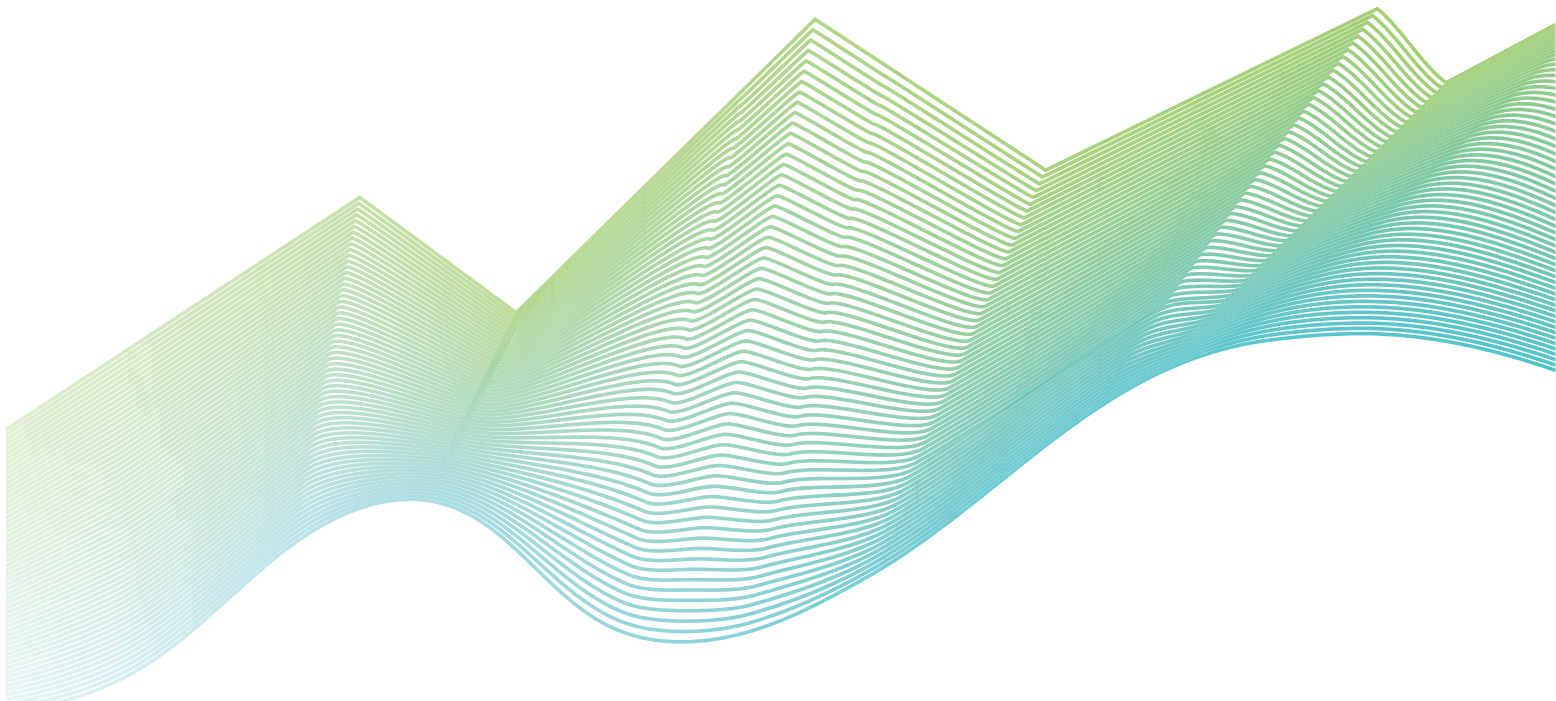
High-level summaries of business activities undertaken by each of these four entities are as follows. Except as noted, all employee figures are as of 30 June 2024.

- Hydro Tasmania (not including Entura) has 844 employees and is primarily involved in the generation of hydropower in Tasmania, and the trading of electricity and energy-related environmental products (such as renewable energy certificates) in Australia's National Electricity Market. Hydro Tasmania owns and manages 54 major dams and 30 operating hydropower stations and supplies electricity to two Bass Strait islands via hybrid power plants that combine diesel, solar and wind power generation. Hydro Tasmania is also engaged in new projects as part of its future energy vision – the proposed Tarraleah Redevelopment and Cethana Pumped Hydro projects. Most Hydro Tasmania employees work either at power stations across the state or at the head office in Hobart.
- Entura provides consultancy services nationally and internationally for renewable energy development, engineering, hydropower, water infrastructure, water management, project management, environmental

management and other relevant disciplines. Entura employs 265 technical professionals and administrative staff, including 25 employees based in its India office in New Delhi. A minority of consultants are situated in the Hydro Tasmania group's Melbourne and Adelaide offices.







- Momentum Energy is principally engaged in marketing and retailing energy and energy-related products and services to residential and business customers on mainland Australia (excluding Western Australia, ACT and Northern Territory) and the Bass Strait islands. Staff are mainly based in Tasmania and Victoria (Melbourne). Momentum Energy employs 330 personnel.
- AETV operates a gas generation power station in the Tamar Valley in northern Tasmania. The station was commissioned in 2009. It provides both base load and peaking generation via combined and open-cycle gas turbines. AETV employs 25 personnel.

All four businesses comprising the Hydro Tasmania group follow the same procurement policy and procedures via a single supply chain function called Business Services in Hobart, Tasmania. The Entura Indian office is an exception and conducts its own procurement according to its ISO9001-certified sourcing procedure aligned with the Hydro Tasmania group's processes.





## Hydro Tasmania group operations and supply chains

Hydro Tasmania	<b>Generation asset maintenance, upgrades and repairs</b> 	<ul style="list-style-type: none"> <li>• Operation and maintenance of generation equipment, including machinery in power stations and water conveyancing infrastructure</li> <li>• Feasibility studies for pumped hydro</li> <li>• Progressing works associated with Tarraleah Redevelopment and Cethana Pumped Hydro projects</li> <li>• Land care, waterway, and flora and fauna conservation</li> <li>• Testing and monitoring equipment</li> <li>• Electrical distribution on the Bass Strait islands</li> <li>• Equipment hire</li> </ul>
	<b>Energy generation</b> 	<ul style="list-style-type: none"> <li>• Hydro generation plant and equipment consumables</li> <li>• Diesel (Bass Strait islands)</li> <li>• Industrial consumables</li> <li>• Gas (AETV)</li> <li>• Wholesale energy trading</li> </ul>
Hydro Tasmania	<b>Corporate services</b> 	<ul style="list-style-type: none"> <li>• Personal protective clothing and equipment (PPE)</li> <li>• Legal services</li> <li>• Marketing and advertising</li> <li>• Office services and improvements, including cleaners and facility repair work</li> <li>• Office and asset-based labour hire</li> <li>• Travel, fleet purchases and maintenance</li> <li>• Freight and logistics</li> <li>• Security services</li> <li>• Stationery and office consumables</li> </ul>
	<b>Information technology</b> 	<ul style="list-style-type: none"> <li>• Hardware</li> <li>• Software and licensing</li> <li>• Consulting services including architecture and security</li> <li>• Telecommunication</li> </ul>
Entura	<b>Consulting</b> 	<ul style="list-style-type: none"> <li>• Professional and technical services throughout Australia and overseas</li> </ul>
Momentum Energy	<b>Retail customer service</b> 	<ul style="list-style-type: none"> <li>• Customer research services</li> <li>• Debt collection services</li> <li>• Bill printing and issuing</li> <li>• Call center software to manage workflow and customer accounts</li> </ul>



# Modern slavery risk overview

The Hydro Tasmania group's supply chain is broad. Consequently, the business's exposure to modern slavery risks is diverse. Hydro Tasmania sourced goods from 2 of the top 5 at risk industries as identified from the 2023 Walk Free Global Slavery Index in the reporting period, being electronics and garments. Modern slavery has the potential to be present in:

- Entura's subcontractor supply chains delivering goods and services overseas, particularly in countries considered high-risk in the Global Slavery Index;
- the procurement of corporate clothing and personal protection clothing and equipment;

- the sourcing of equipment, machinery, consumables and materials from overseas, particularly for energy generation where European suppliers may procure supplies from high-risk countries. This risk may increase as Hydro Tasmania embarks on planned large scale infrastructure projects;
- labour-hire sourcing within Australia (no labour hire occurs overseas); and
- IT hardware and software procurement.

Entura has a consulting office based in New Delhi. Apart from some smaller IT procurement, PPE, office consumables and office cleaning services, most suppliers to Entura's India office are technical and professional service providers, who present a lower modern slavery risk compared to other occupational and industry categories.

## Identifying and responding to modern slavery

During the 2023/24 reporting period, Hydro Tasmania continued to focus on improving our approach to identifying and responding to modern slavery risks. Key areas of work were:

### Hydro Tasmania Modern Slavery Working Group

To support identifying and responding to modern slavery risks, Hydro Tasmania's Modern Slavery Working Group continued to meet. This group has been operating for four years and meets regularly to improve process, keep abreast of industry modern slavery risks, report to management on risks and progress, and prepare the Modern Slavery Statement.

### Modern Slavery Training for employees

In the 2022/23 reporting period, Hydro Tasmania rolled out compulsory modern slavery awareness training to all staff and included the training as part of new employee induction processes. This has continued in the current 2023/24 reporting period with the training updated to ensure relevancy and reflect the latest data available. At the end of the reporting period 1308 people had completed the training with a completion rate of over 99%.

Within Entura, Integrity Framework training, which

includes modern slavery aspects, was completed for new starters and those needing the 2 yearly training refresh.

### Policy Development

Hydro Tasmania endorsed an updated Procurement and Contracts Procedure in May 2024. This procedure included additional guidance for staff to help avoid modern slavery in our supply chain.

### Identification and review of suppliers

Hydro Tasmania continues to engage with sustainability and supply chain consultants 'Informed 365' to assist in preliminary risk assessment, and to conduct future surveys and investigations of Hydro Tasmania group's supply chains. Informed 365's IT platform is used by other prominent members of the international energy industry through the Energy Procurement Supply Association (EPSA Consortium). The Informed 365 platform continues to be used by Business Services to manage supplier surveys and risk identification.

Of approximately 1500 total direct suppliers, 272 suppliers have been engaged through the platform, which is an increase of 200 from the previous reporting period. Of the 272, no high or very high-risk suppliers were identified with 45 medium risk identified, the remaining were either low or very low risk.



## Contract clauses

Hydro Tasmania group continues to include modern slavery clauses in its procurement contract templates to ensure suppliers do not engage in modern slavery and that modern slavery laws are complied with. These clauses have been reviewed and updated in 2023/24.

## Supplier Code of Conduct

In the previous reporting period, Hydro Tasmania committed to completing a Supplier Code of Conduct. The Supplier Code of Conduct was endorsed by the Hydro Tasmania executive team with a roll out and integration into Hydro Tasmania contract templates to commence in 2024/25.

## Large Scale Infrastructure Projects

Hydro Tasmania is currently working on a number of large-scale infrastructure projects, including the proposed Tarraleah redevelopment and Cethana pumped hydro projects and upgrades of West Coast hydropower stations. As per the previous reporting period, work continued on environmental, social and governance requirements for these major projects, including planning for modern slavery due diligence requirements as a part of any future procurement process.

## Entura's Integrity Framework and sustainability screening process

Entura's approach to modern slavery is defined by Entura's Integrity Framework and is guided by the Hydro Tasmania group's Code of Conduct, Sustainability Principles, Work Health and Safety Policy, and Environmental Policy. Entura's commitment to these policies is outlined in its publicly available Integrity Commitment Statement.

The Integrity Framework is part of Entura's ISO9001-certified quality management system. This framework supports sustainable and ethical decisions when considering the countries and contexts where Entura works, what projects Entura works on and with whom they choose to partner. Modern slavery commitments are incorporated into the Integrity Framework and are guided by the *United Nation's Guiding Principles on Business and Human Rights*.

The Integrity Framework requires the following when working with suppliers, partners and sub-consultants:

- considering the supply chains of partners, subcontractors and suppliers, and the likelihood of whether supply chains may involve human rights issues associated with forced, compulsory, trafficked or child labour;
- undertaking sustainability screening prior to the engagement of all new partners, subcontractors and suppliers with more than 10 employees;

- providing clients, suppliers and subcontractors access to the Integrity Commitment Statement to ensure they understand and comply with commitments;
- proactively raising concerns about issues that Entura employees see in the behaviour of suppliers, partners and sub-consultants; and
- where issues are identified and validated, updating and re-evaluating the relevant sustainability screening.

During the reporting period, 129 sustainability screenings were conducted of potential clients and/or projects. For more details of Entura's Integrity Framework see [www.entura.com.au/about/enturas-integrity-management](http://www.entura.com.au/about/enturas-integrity-management).

During the reporting period, Entura also supported clients to understand modern slavery risks associated with the renewables industry and how to manage this risk through due diligence and procurement.

## Collaboration with Industry

During the reporting period, Hydro Tasmania continued to collaborate with industry, including membership of the EPSA Consortium across the energy industry and the Clean Energy Council Risks of Modern Slavery Working Group. We will continue to be involved in group forums to support review of legislation, share knowledge and improve business practice.

## Responding to modern slavery

If modern slavery is identified as part of supplier investigations or other means such as public interest disclosure, the Hydro Tasmania group will respond by taking all appropriate actions in accordance with the guidance provided by the Australian Government's *Guidance for Reporting Entities*. This guidance includes not trying to resolve the situation independently to the potential detriment of victims, and to consider ending a supplier relationship only if the supplier refuses to address modern slavery and there is no real prospect of change. In most instances, we will collaborate with reputable international and local organisations that can provide pragmatic assistance appropriate to each location and cultural context.

## Modern Slavery Internal Audit

Hydro Tasmania commenced a self-initiated review of its modern slavery practices and reporting in June 2024. The scope of the internal audit is to review the effectiveness of the key processes and controls implemented by Hydro Tasmania to manage modern slavery risks, including reporting and related systems, and to conduct a gap analysis of the 2022/23 Modern Slavery Statement in alignment with the mandatory criteria of the Act. The review was finalised in September 2024.



# Assessing the effectiveness of modern slavery actions and future improvements

The Hydro Tasmania group is committed to identifying and responding to modern slavery risks as an exercise of continual improvement. Our risk assessment of suppliers, based on location, industry and expenditure, provides a solid foundation for further investigation, review and improvement.

Hydro Tasmania will continue to work on management approaches to combat modern slavery in our supply chains. This involves the following Key Areas of Action in FY2024/25:

- Implement due diligence measures to screen for supplier modern slavery risks during procurement processes.
- Continue to collaborate with key industry groups, including the Clean Energy Council and the EPSA consortium, to support a collaborative approach to reduce modern slavery risks.
- Continuously improve Entura's Integrity Framework and sustainability screening process, including continual assessment of modern slavery risks associated with the renewable energy industry.
- Hydro Tasmania's Modern Slavery Working Group will continue to focus on modern slavery risk effectiveness through its reporting on milestone achievements to the Executive during FY2024/25.
- Work through any recommendations from the Modern Slavery internal audit project that was completed in September 2024.
- Incorporate the Supplier Code of Conduct into procurement and contracting processes.







