

# **Modern Slavery Statement**

**2021**

# Modern Slavery Statement 2021



## MESSAGE FROM OUR BOARD CHAIR AND CEO

At ActewAGL we pride ourselves on conducting our business ethically and with integrity. Any form of modern slavery is unacceptable and we are committed to ensuring that modern slavery does not take place in any part of our business or supply chains. To do this we will continually review our procurement processes and maintain effective systems and controls to ensure we fulfill our obligation and responsibility to help eradicate modern slavery.

In producing our second Modern Slavery Statement, ActewAGL has taken significant steps to prevent, detect and respond to slavery and human trafficking within our business and throughout our supply chain. We recognise this is just the start and will continue to be a major focus for our organisation.

This Modern Slavery Statement was approved in November 2021 by the ActewAGL Joint Venture Board of Directors.



**Damien Nicks**  
Chair  
ActewAGL



**John Knox**  
Chief Executive Officer  
ActewAGL

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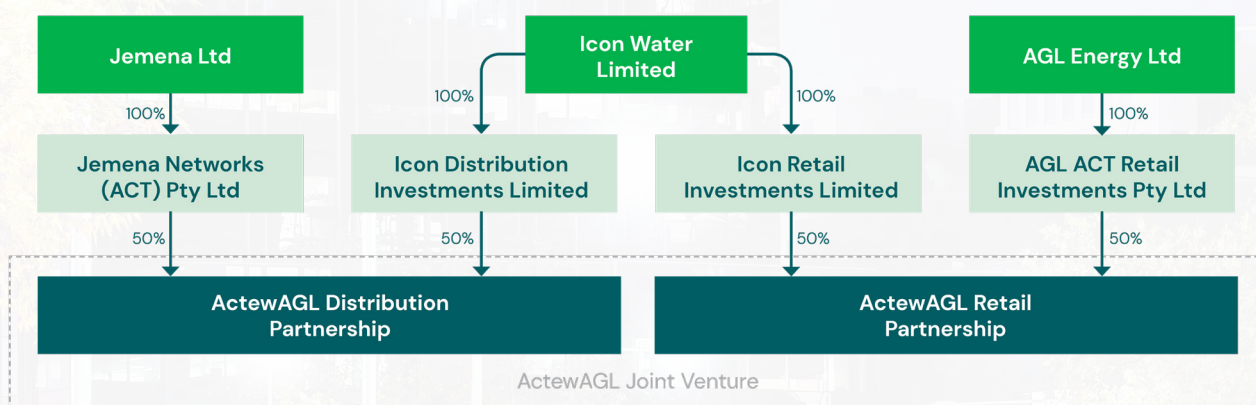
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## 1 Identifying the reporting entity

### ABOUT ACTEWAGL

ActewAGL was set up in October 2000 when the Australian Gas Light Company (AGL) and Icon Water Limited (formerly ACTEW Corporation), an ACT Government owned corporation, entered into Australia's first utility joint venture. Today ActewAGL is made up of two partnerships:

- ActewAGL Retail (ABN 46 221 314 841) is owned 50 percent each by Icon Water Limited and AGL Energy Ltd via subsidiary companies. ActewAGL Retail is an electricity and gas retailer within the ACT and parts of NSW.
- ActewAGL Distribution (ABN 76 670 568 688) is owned 50 percent each by Icon Water Limited and Jemena Ltd via subsidiary companies. On 1 January 2018, the part of ActewAGL Distribution that operates and maintains the ACT electricity and gas network changed its name to Evoenergy.



We employ 700 people in the Canberra region, with our offices located in the ACT. We recognise the decisions we make have a social and environmental impact on our business, customers and suppliers. We are committed to understanding and minimising the social and environmental consequences of our business operations.

## 2 Structure, Operations & Supply Chain

### OUR SUPPLY CHAIN

ActewAGL has a diverse supply chain with suppliers across many industries and services. Our purchased goods and services range from large electrical infrastructure, field services, corporate services, IT and supporting goods.

An external analysis of ActewAGL's Supply chain was conducted in FY20 to identify potential modern slavery risks.

The following were considered when undertaking this analysis:

- Geographic – suppliers country of operation and the prevalence of modern slavery
- Sector and industry – categories of goods and services purchased

The analysis found no high risk of modern slavery within our supply chain.

#### Key facts on our supply chain:



**520**  
suppliers



**\$265m**  
annual spend



**99%\***  
of spend with  
Australian-based  
suppliers



**1%**  
of spend with  
international  
suppliers

The 1% of international spend was in countries that have medium to low rankings in prevalence and vulnerability to modern slavery. Goods purchased by ActewAGL with the highest risk of modern slavery include apparel clothing and accessories (including safety equipment) and electronics.

#### Supplier Code of Conduct

All contracts ActewAGL have entered into since October 2019 include specific anti-slavery clauses.

To address existing vendors and contracts, a Supplier Code of Conduct was introduced in FY20 and requires ActewAGL's Suppliers, and their employees, agents, suppliers and sub-contractors to respect and adhere to ActewAGL's Code of Conduct when conducting business with ActewAGL.

We expect all of ActewAGL's Suppliers to comply with the Code and spirit of all laws and regulations that affect business conducted with ActewAGL. The ActewAGL Code of Conduct provides labour and safety standards in relation to compensation, working hours, freedom from harassment, security and working environment. All vendors with spend greater than \$50,000 have signed the Supplier Code of Conduct. All new vendors are required to sign the Supplier Code of Conduct as part of the onboarding process.

The Supplier Code of Conduct is available on [our website](#).

\* From analysis of Supplier master file which records the location of suppliers Registered office as opposed to the location of manufacture

## 3 Modern Slavery Risk

### OUR EMPLOYMENT PRACTICES

ActewAGL embraces the core areas outlined in the United Nations Global Compact of human rights, labor standards and the environment and anti-corruption.

Our major focus is on human rights, workplace health and safety, environmental management, materiality, supplier management and modern slavery. ActewAGL is committed to building a diverse workforce where employees' individual differences and attributes are respected and valued.

We are committed to our staff and ensuring their physical and mental health. We do not tolerate discrimination, unsafe work practices, fraudulent behaviour, and other inappropriate behaviour. ActewAGL requires employees to align their behaviour and work practices with our Code of Conduct and policies and procedures.

ActewAGL conducted a full review of our policies and procedures, incorporating changes to ensure Modern Slavery was addressed.

Our policies and procedures which assist in managing sustainability and human rights include the following:

#### Employee Code of Conduct

This Code demonstrates ActewAGL's commitment to employees and employees' commitment to ActewAGL. It provides guidelines to assist employees to make the right choices when it comes to our culture, customers, business and reputation. [The Code of Conduct](#) also ensures employees adhere to our relevant corporate policies and procedures, follow established protocols and comply with all relevant legislation, codes and standards covering ActewAGL's operations.

#### People Policy

Our People Policy provides direction and documents ActewAGL's commitment to our employees in establishing a safe, fair, respectful, diverse and flexible environment where people are proud and engaged.

This policy outlines that ActewAGL:

- is committed to the success of all our employees
- treats all people with respect, acts with integrity, honesty and openness
- makes employment decisions fairly
- values diversity, supports flexibility and promotes an inclusive workplace
- rewards in a fair and equitable manner
- investigates workplace complaints

# Modern Slavery Statement 2021



## Whistleblower Procedure

This procedure provides ActewAGL employees and non-employees an avenue to report suspected and actual workplace misconduct. It supports the disclosure and investigation of wrongful or illegal behaviour, including fraud and corruption, and modern slavery offences. It also provides protection to whistle blowers to encourage the disclosure of information related to the aforementioned wrongful or illegal behaviour.

A disclosure can be made by phoning **1800 233 285** or emailing [actewagl@deloittedigital.com](mailto:actewagl@deloittedigital.com)

## OUR COVID RESPONSE

The COVID-19 pandemic has impacted us all and challenged us to shift and adapt the way we work. This has included adapting to remote work where possible, but also supporting our frontline workers to continue to safely maintain and operate.

We implemented a range of initiatives to support our people and the community, including:

- keeping our frontline workers safe by incorporating safeguards into our practices such as providing appropriate personal protective equipment and maintaining social distancing
- providing employees with access to special leave for the purposes of caring for others, self isolation or vaccination
- providing financial support through our hardship program for customers who may have been financially impacted by COVID-19

## 4 Assessing & addressing Modern Slavery including due diligence & remediation

### MANAGING MODERN SLAVERY RISKS

As a result of an internal review of our policies and supply chain, initiatives were introduced to reduce the likelihood of modern slavery occurring in our supply chain. We are establishing working practices that enable us to monitor and reduce modern slavery risk within our business and supply chains.

#### Key actions we have undertaken include:

- Updated corporate policies and procedures to address modern slavery, including our People Policy and Whistleblower Procedure.
- Provided training on modern slavery to all employees. This training is mandatory and will be refreshed bi-annually. Last financial year, 94.1% of employees completed their training.
- Potential high-risk suppliers in our review were sent communication asking them to confirm their companies position on modern slavery and actions they are taking in their own supply chains.
- Inclusion of an Anti-slavery clauses in Supplier Contracts.
- Inclusion of modern slavery audits in our Internal Audit Program. Vendor contracts are reviewed to ensure adherence and any omissions are corrected immediately with the supplier.
- Supplier Code of Conduct introduced and must be agreed to by all new and existing suppliers of ActewAGL. Through this code, ActewAGL reserves the right to verify supplier's compliance with the Code. If it is found that a supplier does not comply, ActewAGL reserves the right to demand corrective measures or to terminate the business relationship. All vendors with annual spend greater than \$50,000 have signed the ActewAGL Supplier Code of Conduct.



## Actions taken to assess & address risks:

### Remediation

- All new or varied Supply contracts include Modern Slavery remediation and termination clauses.
- Should any examples of modern slavery be identified or reported, our priority is to support those in need by working to remediate the issue.

### Due Diligence

- As a result of COVID-19 and potential increase of modern slavery risk in the Personal Protection Equipment (PPE) supply chain we will undertake a deep dive assessment of PPE
- In collaboration with the Energy Procurement and Supply Association (EPSA) a deep dive of 80 suppliers was conducted requiring vendors to provide details of their:
  - Workforce composition
  - Supply chain
  - Business controls
  - Procurement processes
  - Employment processes
  - Whistle-blower program
- Data in the EPSA registry advised that none of the 80 vendors reviewed provided a High Risk of Modern Slavery
- We will continue to work through our supply base undertaking a deep dive to further review vendors and their suppliers
- Assessment process will be incorporated into the new supplier onboarding process

## 5 Assessing effectiveness

### ASSESSING OUR EFFECTIVENESS

To ensure our continued satisfaction of mitigating Modern Slavery risks, we will:



**Embed Modern Slavery e-learning** as part of our staff Induction process



Ensure all staff undertake **Modern Slavery refresher training** bi-annually



Provide **up-to-date factsheets and resources** in relation to Modern Slavery on our intranet



**Audit vendor contracts** on an annual basis as part of our Internal Audit Compliance Program

It is important to reflect on the work that has been done and regularly review our progress. We demonstrate the effectiveness of our actions by:

- maintaining a modern slavery working group with representatives from across the business to enable regular engagement and feedback between key areas
- continually reviewing and improving our approach and response to modern slavery risks
- tracking the actions taken to address modern slavery risks and measuring their impact
- providing updates to members of our Board through the Safety, Audit and Risk Committee.

## 6 Consultation and Collaboration

### CONSULTATION WITH OTHER ENTITIES

We consult with representatives from our Joint Venture entities, Evoenergy and ActewAGL Retail collaborating on our approach to the analysis of our risk profiles and undertook joint risk assessments on our tier one suppliers to identify our modern slavery risks.

We worked together to review employment conditions that focus on the rights and wellbeing of our employees, including the labour standards articulated through our respective enterprise agreements.

We agreed our proposed approaches to including modern slavery clauses in our procurement and contractual documentation to provide a consistent message to our supply chains. We also reviewed and updated our labour hire contract arrangements to ensure they embed modern slavery considerations.

### INDUSTRY COLLABORATION

#### Energy Procurement and Supply Association (EPSA)

We collaborate with our industry peers through the Energy Procurement and Supply Association to facilitate a joint industry approach to assessing our supply chains. This leads to a best practice approach to supply chain risk management and creates an alignment of values to which vendors must adhere.

#### Infrastructure industry Mental Health & Sustainable procurement initiative: Xmas tender blackout period

We have aligned our business and procurement activities with the Infrastructure industry's Mental Health and Sustainability initiative of implementing a Procurement process Blackout period. We will cease all live Procurements by 17 December 2021 with any new Procurements commencing on or after 5 January 2022.

This initiative gives everyone the opportunity at all levels of our industry a well-deserved, uninterrupted rest over the end-of-year holiday period enhancing the health and wellbeing of all. The end of year holiday period is an important time for families and friends to come together and for people to recharge. We are acutely aware of the ongoing impact that the pandemic together with the huge volume of industry projects is having on the wellbeing of our teams and people. Together with other large infrastructure organisations we have the power to provide a window for people across the industry to put aside work for this short period and recharge.

This break is also vital to making our industry an attractive and mentally healthy place for everyone to work within. People are our industry's most valuable asset, providing a break at year end is a must to maintain high levels of performance, productivity and retention.

## INFORMING THE COMMUNITY

Through our corporate website we publicly detail the standards of conduct and principles our staff are required to uphold. These set out the minimum requirements we expect in areas such as workplace policies and practices, health and safety, human rights, environmental protection and business integrity. We also encourage suppliers within our supply chain to embrace similar values by adhering to our Supplier Code of Conduct.

Our Modern Slavery Commitment is also promoted through our website together with Whistle-blower details.

## 7 Plans for future action

### TAKING ACTION

ActewAGL encourages anyone (including employees, agents, consultants, contractors or representatives) to report in good faith any concerns about potential violation of legal or regulatory requirements involving ActewAGL or any of its suppliers in its supply chain, especially in regards to the risks of modern slavery.

ActewAGL employees should feel confident that any reports of alleged violations or identification of modern slavery risks, will be dealt with on a confidential basis and in accordance with ActewAGL's Code of Conduct, People Policy and Whistleblower Procedure.

### OUR FUTURE COMMITMENT

ActewAGL recognises that eliminating modern slavery within our business and supply chain requires an ongoing commitment. Identifying and addressing modern slavery risks in our operations and supply chains requires sustained effort through continuous improvement. We expect our approach to continually evolve as we refine our processes and build capability within our business.

#### In 2021–22 we will focus on:

- continuing our education program and providing bi-annual refresher training to all employees.
- enhancing documentation to further improve modern slavery risk management assessment as part of our procurement processes
- incorporating our modern slavery risk assessment as part of the new supplier onboarding process
- continuing our deep dive to identify modern slavery risks through our end to end supply chain
- continual development and enhancement of our remediation process as a result of any experiences

***ActewAGL***