



Modern Slavery Statement

2023/2024

Connecting Queenslanders to a world-class energy future



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Message from the Board

Freedom from slavery is a fundamental human right.

Powerlink is committed to working to eliminate modern slavery in accordance with the Commonwealth Modern Slavery Act 2018 and in alignment with the UN Guiding Principles on Business and Human Rights.

In the financial year 2023/24, Powerlink prioritised continued education and training for our people on the risks of modern slavery in our operations and supply chains as well as implementing effective systems and controls to reduce the risk of modern slavery in our business arrangements.

We continue to work collaboratively with our suppliers and industry peers to identify, assess and address the risks of modern slavery within our supply chain.

This Statement outlines our actions to assess the risk of modern slavery in our operations and supply chain, as well as our continued efforts to raise the awareness of modern slavery.

The Powerlink Board as the principal governing body has formally endorsed this Statement and verify it to be true and correct. As per the requirement of the Act, a Director on the Board has approved the submission of this Statement for the period 1 July 2023 to 30 June 2024.



Kathy Hirschfeld AM
Chair



This Modern Slavery Statement (Statement) has been developed by Queensland Electricity Transmission Corporation Limited, ABN 82 078 849 233, trading as Powerlink Queensland (Powerlink) in accordance with the requirements of the *Commonwealth Modern Slavery Act 2018*. This Statement demonstrates the actions taken to assess and address modern slavery risks within Powerlink’s operations and supply chains for the reporting period July 2023 to June 2024. As the majority shareholder of Queensland Capacity Network Pty Ltd ABN 75 633 081 517 trading as QCN, and CopperString 2.0 Electricity Transmission Corporation Pty Ltd ABN 37 665 234 702 this Statement produced by Powerlink includes the activities of the subsidiaries QCN and CopperString 2.0.

Powerlink acknowledges the Traditional Owners and their custodianship of the lands and waters of Queensland and in particular, the lands on which we operate. We pay our respects to their ancestors, Elders and knowledge holders and recognise their deep history and ongoing connection to Country.



About this Statement

Modern slavery is a complex, global humanitarian issue that can only be tackled collectively and collaboratively by businesses, not for profit organisations, civil society and governments. At Powerlink Queensland, we are committed to playing our part and expanding our work to understand and address modern slavery risks that may arise in the course of our business.

This is Powerlink's fifth annual Statement since Australia's *Modern Slavery Act 2018* came into force. It explains the policies, systems and processes we adopt to assess our modern slavery risks, and eradicate or minimise those risks with mechanisms that keep all our people vigilant and accountable.

This includes:

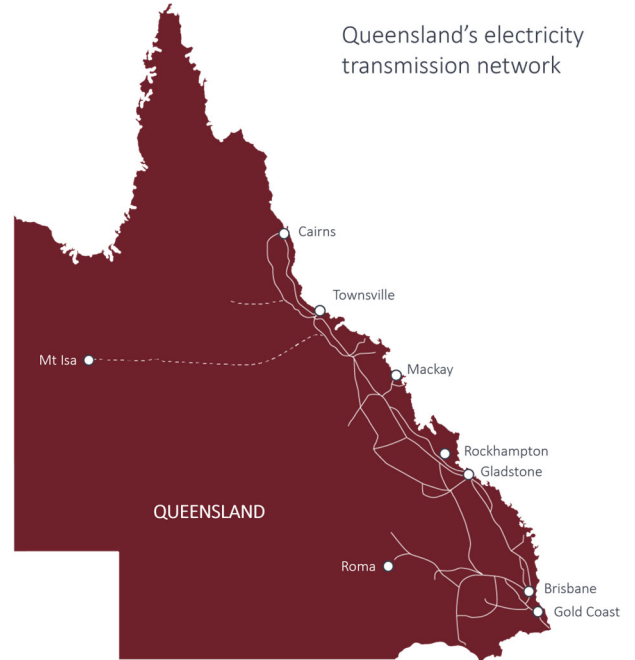
- improving the awareness of our staff in understanding and identifying these risks;
- embedding modern slavery risk considerations into our sourcing and contracting activities; and
- enhancing our partnerships with government and industry associations to further develop best practices in addressing risks of modern slavery.

We are committed to continuously improving our approach to identify, assess and mitigate modern slavery risks and remain focused on making a positive contribution within the communities where we operate.

Our business

Powerlink is a Government Owned Corporation (**GOC**) that owns, develops, operates and maintains the high voltage electricity transmission network in Queensland. Our network extends 1,700 kilometres (km) from Cairns to the New South Wales border and comprises 15,449 circuit km of transmission lines and 152 substations. Our purpose is **Connecting Queenslanders to a world-class energy future.**

We provide electricity to more than five million Queenslanders and 241,000 businesses. We are also responsible for connecting large-scale renewable energy developments, including wind and solar, and providing electricity to large industrial customers in the rail, mining and Liquefied Natural Gas sectors.



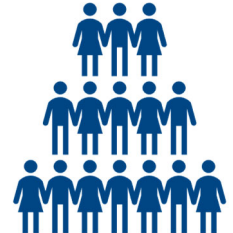
- **Queensland Government owned** – one of Australia's leading transmission network companies
- Link to the National Electricity Market via the **Queensland/NSW interconnector** transmission line
- Our network runs **1,700km** from north of Cairns to the New South Wales border
- **15,449** circuit kilometers of transmission lines and **152** substations
- We **own, develop, operate and maintain** the high voltage transmission network in Queensland
- We provide network **connections** to large-scale generators and major industrial customers
- South-East Queensland is about **60 percent of total State load**
- Provide electricity to more than **five million Queenslanders** and **241,000 businesses**

People

Powerlink employs approximately 1,725 workers, 1,566 of which are permanent employees. The remaining 159 workers are non-permanent employees and/or labour hire engaged in non-permanent roles. Many of our employees live and work locally in the communities where we operate.

Powerlink has a clearly understood and articulated Industrial Relations Strategy, consistently applied by our leaders that focuses on:

- relationship management;
- constructive workplace culture; and
- a safe, engaged, skilled workforce.

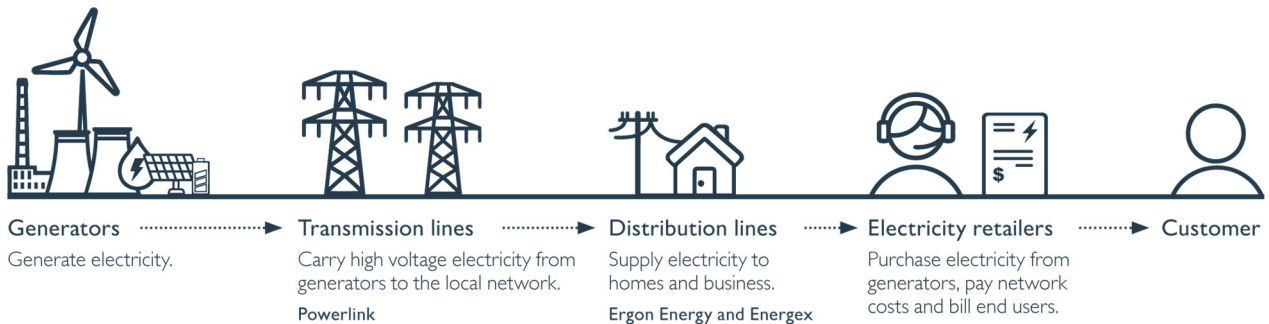


Operations

Powerlink's role in the electricity supply chain is to transport high voltage electricity from large generators through our transmission grid to the distribution networks owned by Energex and Ergon Energy (part of the Energy Queensland Group) and Essential Energy (in northern New South Wales) to supply customers.

We also transport electricity to large industrial customers such as rail companies, mines and mineral processing facilities, and to New South Wales via the Queensland/New South Wales Interconnector transmission line.

Electricity supply chain





Powerlink is playing a central role in the energy transition. We are a leading provider of electricity transmission services, delivering a safe, cost effective and reliable transmission network for Queenslanders. The majority of our network is regulated by the Australian Energy Regulator under the National Electricity Law and the National Electricity Rules.

CopperString 2032 Project

The CopperString 2032 project led by Powerlink, is the largest ever economic development project in North and Northwest Queensland and the largest ever major project for Powerlink.

The project initially involves building 840km of new electricity transmission line from just south of Townsville in the Burdekin region to Mount Isa that will connect Queensland’s North-West Minerals Province to the National Electricity Market for the first time in Australia’s history.

Developing CopperString 2032

Fast facts

CopperString 2032 connects

North West Minerals Province ↔ Flinders Renewable Energy Zone ↔ National Electricity Market

~840km of transmission
line from just south of Townsville in the Burdekin region to Mount Isa

~200km of additional
transmission line to connect new renewable generators

>800 direct jobs
supported during construction with outgoing jobs during operations and maintenance

Approximately
2,200
tower structures

Tower height approximately
80m

~75,000
tonnes of steel

~75,000
tonnes of concrete

Up to **six**
new substation sites

CONDUCTORS 18,600km OPGW 2,200km

KEY TOWNSHIPS

TOWNSVILLE | CHARTERS TOWERS | AYR | HOME HILL | PENTLAND
HUGHENDEN | RICHMOND | JULIA CREEK | CLONCURRY | MOUNT ISA

Subject to project finalisation

Powerlink's subsidiary

Queensland Capacity Network (QCN)

Powerlink is a majority shareholder of Queensland Capacity Network Pty Ltd (**QCN**), a telecommunications company, jointly owned by Powerlink and Energy Queensland. Its mission is to improve telecommunications connectivity across the whole of Queensland, through leveraging spare capacity on the government-owned fibre network and access to infrastructure to host telecommunications equipment.

QCN is a totally carrier diverse and geographically diverse fibre network spanning more than 13,000km stretching from the Gold Coast, west from Brisbane to Toowoomba and beyond, and north through regional townships up to Cairns.

With infrastructure of over 20,000 high voltage and telecommunications towers, QCN's extensive coverage offers improved wireless connectivity and coverage via high-capacity wholesale backhaul services to telecommunication service providers. This allows for the transmission of large volumes of voice, data, and video traffic.

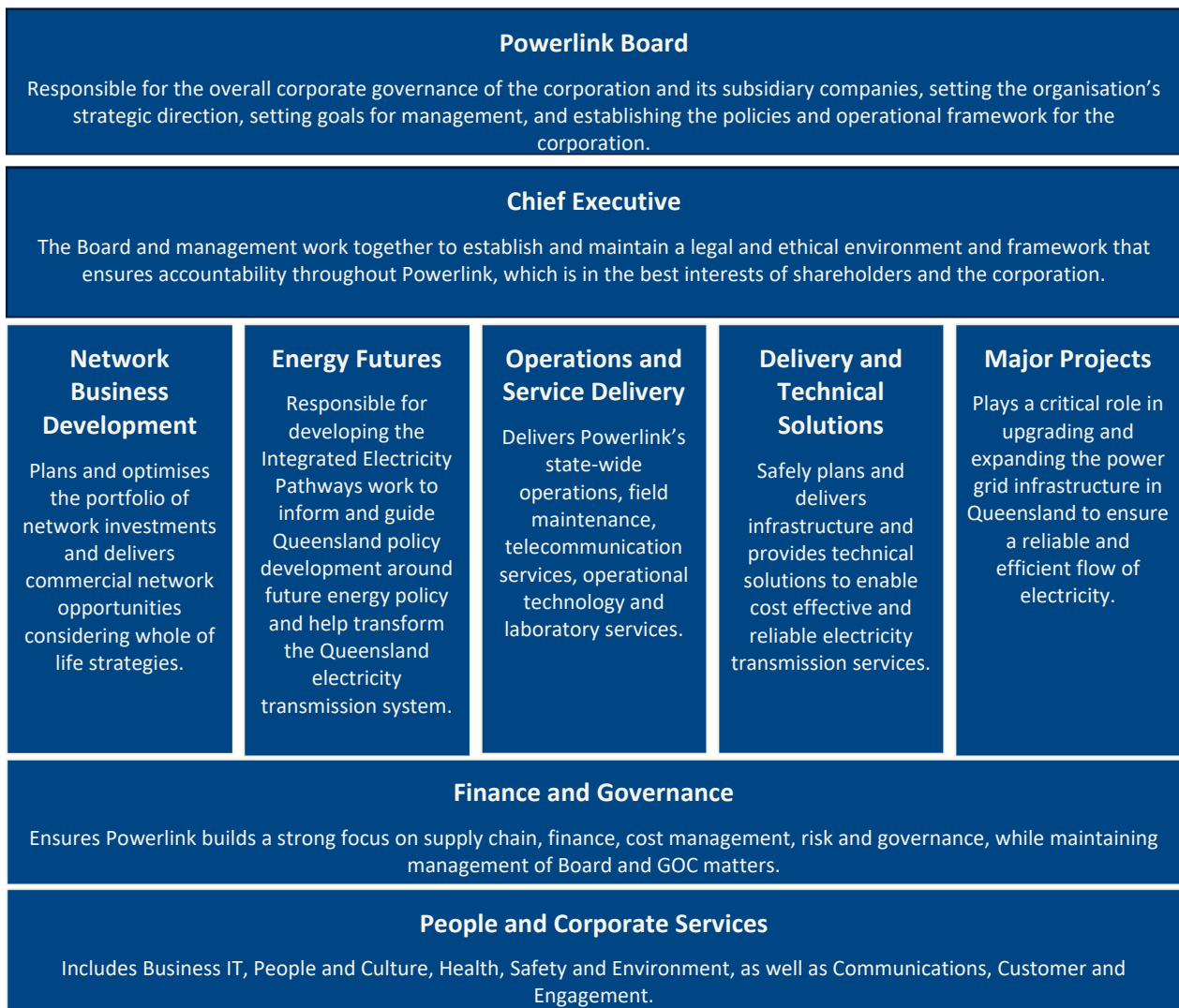


Structure

The Powerlink Board and Executive Team establish the overall corporate governance of Powerlink, as well as the strategic direction, policies and operational framework. The Board and management work together to establish and maintain a legal and ethical environment and framework that ensures accountability throughout Powerlink that is in the best interests of shareholders and the corporation.

Powerlink is structured into seven distinct business divisions, collectively assigned with the responsibility of providing end-to-end delivery of Powerlink’s key services, as follows:

- transmitting electricity from generators to distributors/customers;
- network operations, asset management, and asset maintenance; and
- installing and maintaining new network infrastructure.



Policy resources in relation to modern slavery

Powerlink has measures in place to identify and reduce the risk of modern slavery in its business operations and supply chains.

Code of Conduct

Powerlink's Code of Conduct (the **Code**) brings to life our values, culture, commitment to our customers and to the community. It sets out the standard of behaviour which is expected at Powerlink, to enable workers to deliver against Powerlink's Mission and Vision.

The Code also supports Powerlink's commitment to:

- accountability and transparency; and
- a diverse, inclusive workforce and working environment for our employees and other workers.

Induction training is undertaken by our workers at the commencement of employment which includes training on the Code. All Powerlink workers are required to undertake refresher awareness training on the Code at least every two years. Powerlink Leaders are responsible for ensuring that their teams understand the Code requirements and that Leaders are reinforcing the requirements of the Code.

Supplier Code of Conduct

Powerlink's Supplier Code of Conduct contains expectations of suppliers to act against human rights abuses in the supply chains and commit to high ethical standards.

Modern Slavery Policy

Powerlink has a Modern Slavery Policy (the **Policy**) committing to identifying and eliminating the risk of modern slavery, which applies to all employees, suppliers and contractors engaged by Powerlink.

The Policy defines the prevention, detection and reporting of modern slavery in any part of Powerlink's operations or supply chains as the responsibility of all those working for or engaged by Powerlink.

Where appropriate, and with the welfare and safety of workers as a priority, Powerlink gives support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own operations and supply chains.

If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains contravenes the Policy, staff are encouraged to raise it with their manager. Alternatively, they may choose to access the Whistle-blower hotline with any concerns.

Powerlink has internally published process maps providing clear guidance to employees for the procedures to follow for each of the following activities: End-to-end process for Managing Modern Slavery, Modern Slavery Incident and Customer Survey Response and Modern Slavery Supply Chain Risk Assessment.

Our supply chain

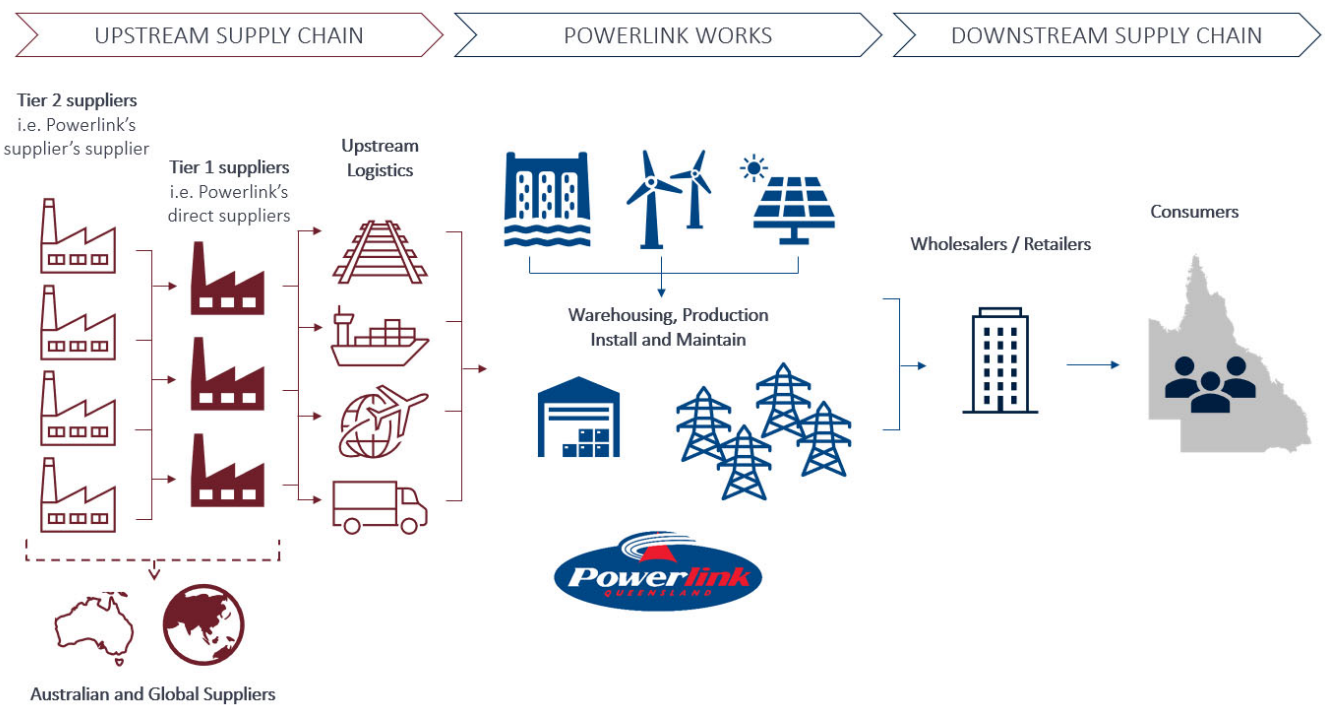
Powerlink’s business activities across Queensland are delivered directly by Powerlink without the use of agencies, distributors or franchising.

Powerlink procures goods and services required to meet the needs of the end-to-end high voltage transmission lifecycle. In delivering those procurement activities, Powerlink upholds the principles of the Queensland Procurement Policy.

The upstream portion of the supply chain includes Powerlink’s suppliers and the processes for managing those relationships.

The Powerlink works portion consists of the operational maintenance and construction activities required to transmit electricity from power generators to customers.

The downstream portion consists of the electricity distributors and retailers managing the direct linkage to end-use customers.



Powerlink has a strong industrial relations presence within its business and relevant unions are engaged regularly as part of applicable sourcing activities. There have been no identified issues with suppliers, trade unions, or other bodies representing workers, in relation to modern slavery risks in the execution of activities across Powerlink’s supply chain.

Financial year 2023/24 spend

During the 2023/24 reporting period, Powerlink’s expenditure was approximately \$1,091 million¹. This consisted of \$986 million on addressable spend, and the remaining \$105 million on non-addressable spend - Statutory, Property and Business expenses.

Powerlink engaged with 2,507 suppliers directly across eight product categories:

- Fleet and Logistics
- Indirect Goods and Services
- Network Maintenance
- Information and Communication Technology (ICT)
- Non Addressable
- Professional Services
- Network Materials
- Network Construction.

Expenditure was highest in the Network Construction category.

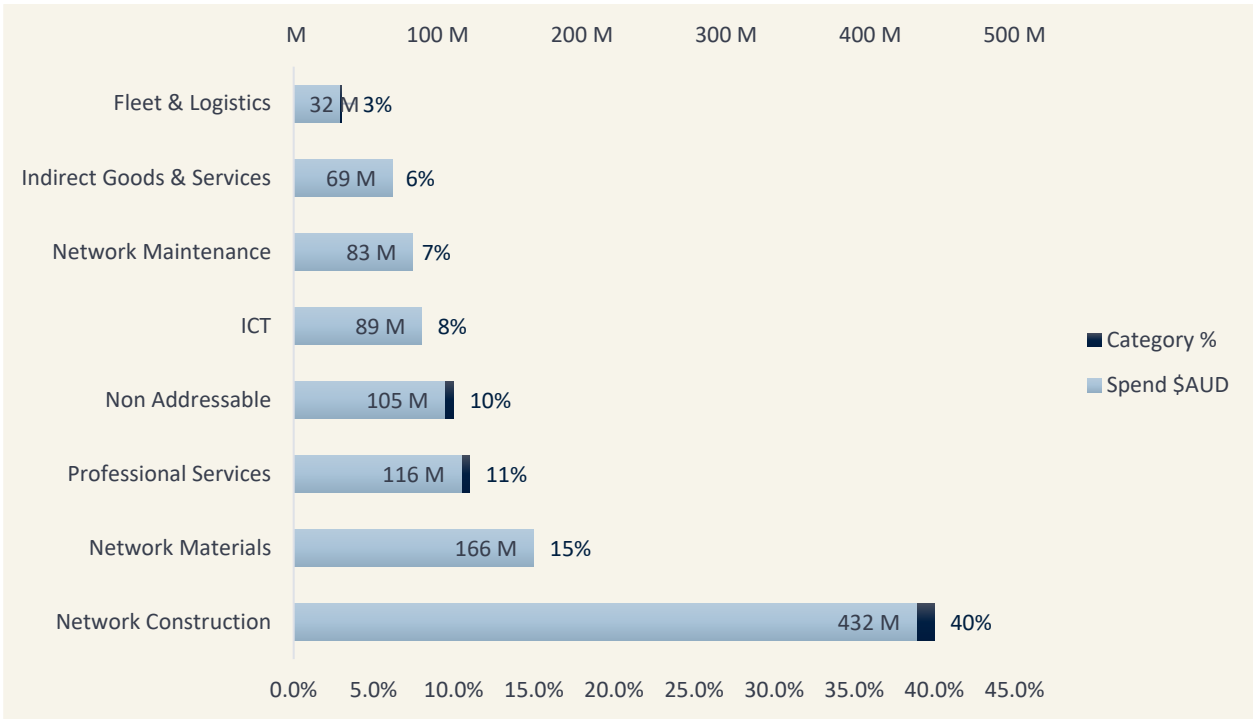


Table 1 Spend in FY2023/24 by category

¹ Values based on FY2023/24 invoiced spend only.

Suppliers by geographic location

Approximately **97 percent (2,444)** of Powerlink’s Tier 1 supplier base is located within Australia, however goods may have some or all components manufactured globally. The remaining **3 percent (63)** of Powerlink’s Tier 1 supplier base is located globally.

Of the Australian suppliers, 73 percent are based in Queensland.

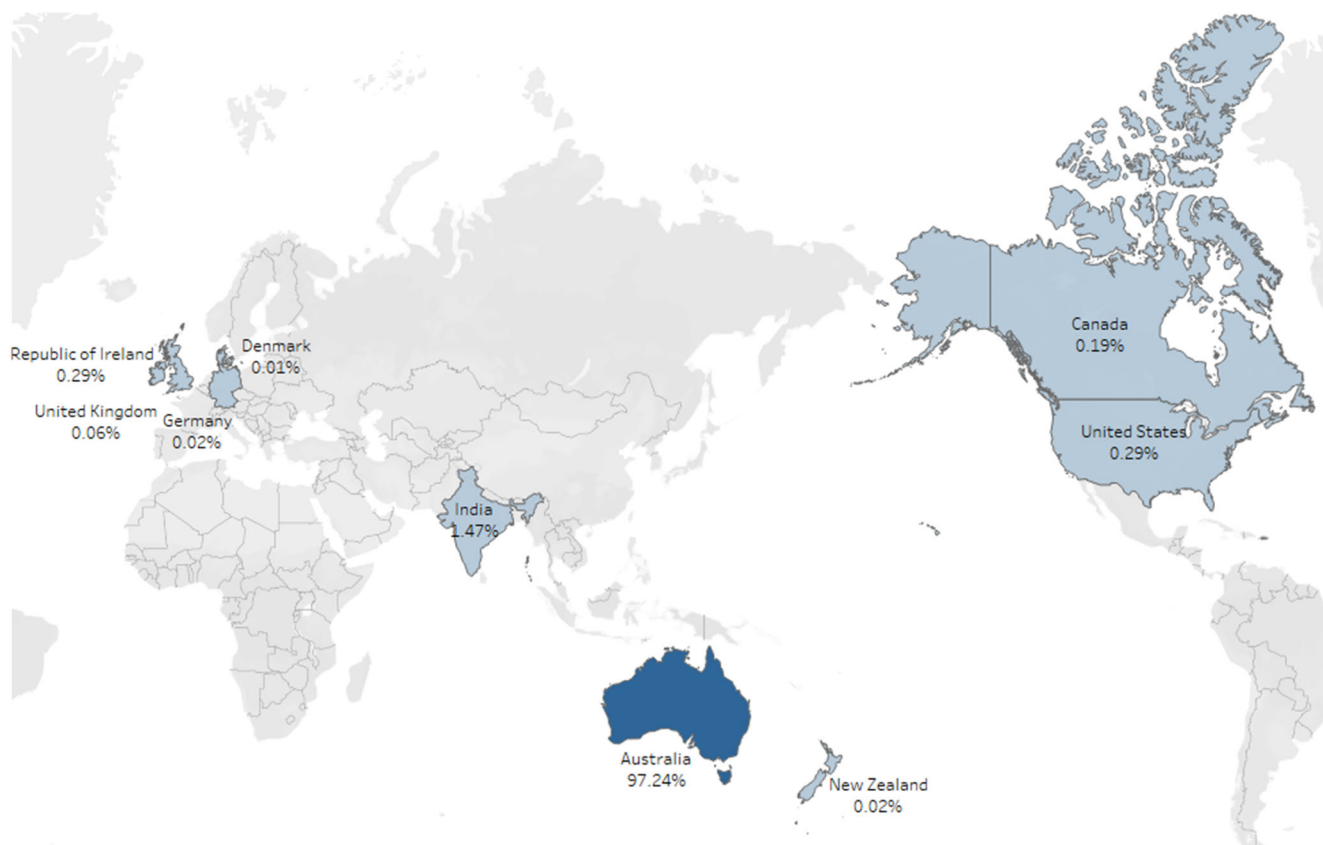


Figure 1 Spend percentages by country based on FY2023/24 invoiced spend only.

While Australia is recognised as a low-risk country from a modern slavery perspective, we acknowledge that we cannot be complacent given that modern slavery does occur in Australia. Moreover, where suppliers are located does not necessarily represent the country of origin of the goods and/or services supplied.

Modern slavery risks

Powerlink's risk of modern slavery is considered in two parts – the risks in our internal operations and the risks in our supply chains.

In our internal operations

The risk of modern slavery in Powerlink's internal operations is managed by the People and Culture division through the implementation of various policies and procedures reflecting legislative and regulatory requirements.

Powerlink ensures that all employees are afforded working conditions meeting or exceeding legislative requirements through Fair Work Commission approved, Enterprise Agreements. The Enterprise Agreements in place at Powerlink throughout the reporting period were the Working at Powerlink Union Collective Agreement 2020 (**WAPA**) and the Powerlink Managers Agreement 2021. During the year, we collaborated with our unions, employees and leaders to offer an increased range of benefits through our refreshed 2024 WAPA and Managers Agreement.

Powerlink engages contractors and labour hire workers when necessary. The risk of modern slavery in these engagements is mitigated using compliant suppliers engaged under a supplier panel, with strict industrial relations terms and conditions applied.

Powerlink has a number of policies and procedures including an Employee Code of Conduct, Employee Complaints Procedure and Complaints Management Framework (including external integrity/whistleblowing hotline) designed to protect the rights of staff.

Powerlink also has a clearly understood and articulated Industrial Relations Strategy, consistently applied by our leaders that focuses on:

- relationship management;
- constructive workplace culture; and
- a safe, engaged, skilled workforce.

Within Powerlink's business, the communities where we operate, and our supply chains – We care for our wellbeing and others. This is at the core of our values.

In our supply chain

External impacts

In the past few years, there has been a period of adjustment during which demand and supply has adapted to the unique circumstances brought on by COVID-19, geopolitical tensions, global inflation, and the boom in global renewable energy. As a result, there has been increased competition as manufacturing, supply, and logistics struggle to keep up with the increased demand for equipment and materials across numerous countries.

The impacts of these external factors on Powerlink's supply chains during the FY2023/24 reporting period include:

- increased prices and lead times for equipment and materials;
- increased freight prices;
- increased risk of quality issues with equipment and materials;
- reluctance of suppliers to commit to long-term pricing arrangements; and
- suppliers seeking reviews of commercial terms and pricing for existing contracts.

Powerlink regularly monitors changing global factors, and assesses the impacts on Powerlink's operations, implementing measures to mitigate these impacts.

The rising demand and prices for components and raw materials increases the potential for modern slavery risks in our suppliers' supply chains, particularly global suppliers.

To increase our resilience and mitigate the potential for increased risk of modern slavery in our supply chains, Powerlink has adopted a flexible and collaborative approach in engaging with our suppliers over existing arrangements, so as not to increase pricing and supply pressures on their operations and supply chains.

Taxonomy and country specific risks

Powerlink procures most of its goods and services directly from suppliers within Australia².

However, we are aware Network materials (our second largest procurement category) may have some components manufactured in the Asia-Pacific region, based on data captured in Factory audit and capability assessments conducted by the Powerlink Materials team.

It is estimated that in the Asia Pacific region, approximately 29.3 million people were living in modern slavery. This accounts for 59 percent of the global total.

When population size is considered, Asia and the Pacific had the third highest prevalence of modern slavery in the world, with 6.8 per thousand people in the region forced to work or marry. Among the five regions, Asia and the Pacific had the second highest prevalence of forced marriage (3.3 per thousand) and the third highest prevalence of forced labour (3.5 per thousand)³.

² Supplier's location is determined based on the country of location listed in Powerlink's ERP SAP.

³ Source: [Asia and the Pacific | Walk Free \(https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/\)](https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/)

Our actions to address modern slavery risks

LOOKING BACK - FY2023/24 deliverables

- Establish a centralised procurement governance and compliance role to provide support and advice to Powerlink and our suppliers in relation to our Modern Slavery Policy and response activities.
- Continue to monitor and report on Australian and Australia-based suppliers in the Powerlink supplier database regarding their completion of the supplier risk assessment.
- List, prioritise and work with our suppliers in each business area that have yet to complete the supplier risk assessment.
- Continue to monitor and update key performance indicators used in our third-party risk assessment platform, based on the compliance of our suppliers in minimising modern slavery risks within their respective supply chains.
- Investigate industry best practice in the application of procedures for:
 - monitoring compliance and breaches of modern slavery practices; and
 - development and implementation of corrective action plans.
- Identify tools and guidance materials in the support of Powerlink's response activities.

FY2023/24 highlights

We understand that effective action towards the eradication of modern slavery requires sustained and long-term effort. Our focus for the reporting period has been on enhancing our core capabilities for the identification of and response to modern slavery risks.

Details of the actions taken during the reporting period to assess and address the risks of modern slavery are encapsulated below.

Governance

Anti-Slavery Working Group

During the reporting period, we reinvigorated Powerlink's Anti-Slavery Working Group to align with Powerlink's refreshed business structure and model. We reviewed and updated the Terms of Reference for the group to align with best practice.

An annual plan of works was developed to establish cadence and timelines for various initiatives and actions in relation to our modern slavery program of works. This will allow us to effectively monitor and review our progress at regular intervals.

Resourcing

The establishment of a Procurement Assurance team in the reporting period, with new resources saw the creation of centralised procurement governance and a dedicated role to provide support and advice to Powerlink and its suppliers in relation to our modern slavery program of works.

Capability uplift

Education and awareness are a key defence against modern slavery. During the reporting period, we continued to raise awareness of our staff through a range of initiatives.

Training

As reported in previous statements, Powerlink has introduced a training module for its staff on modern slavery. We saw a significant increase in the number of new staff joining Powerlink during the reporting period to support our major projects and increased momentum in our non-regulated business. We ensured that new staff members undertook the training module resulting in 238 additional staff being trained during the reporting period.

Separately, we focused our efforts on generating ideas and discovering ways to improve and refine Powerlink's methodology in relation to assigning modern slavery training to new employees at the onboarding stage. This work will continue into FY2024/25 with the intended outcome being that staff with roles in the procurement life cycle undertake the training on commencement of their employment with Powerlink.

Other awareness raising initiatives

We marked the World Day Against Trafficking in Persons with an informative article published on our company intranet. The article received 233 views.

We published communication pieces on modern slavery including key information such as how to spot the signs of modern slavery, and where training and useful external resources can be located.

Supply chain risk assessment and due diligence

We recognise that developing an accurate understanding of our supply chain and where modern slavery risks lie is a challenging exercise. Insights from work done in previous years has helped us determine where to focus our efforts and resources besides providing insight into industry-wide challenges and systemic issues.

During FY2023/24, we commenced investigation and actions aimed at improving our ability to undertake supply chain due diligence and gain better visibility of our supply chain.

Risk assessment and due diligence

We approached risk assessment and due diligence as below:

- Created a priority list of suppliers for due diligence. This list included Powerlink suppliers with a spend of AUD\$1M and over, using spend data from July 2022 to February 2024. This list identified 147 suppliers. Spend with these identified suppliers constituted 90 percent of Powerlink's spend during the same period.
- Conducted due diligence on these suppliers using a combination of the following:
 - completed supplier assessment questionnaires where available;
 - published Modern Slavery Statement of suppliers where available;

- provision of information by suppliers in response to Powerlink's sourcing processes where relevant; and
 - desktop research of supplier profile and media alerts.
- Based on their inherent modern slavery risk rating (using country and category risk factors) for these suppliers and the due diligence conducted, none of the suppliers had a modern slavery risk rating of High.

Media monitoring

Media monitoring can play a crucial role in helping us track emerging trends and patterns related to modern slavery.

To supplement our due diligence efforts, we commenced discovery work on media monitoring with our Communications team. By analysing news articles and reports, we can identify suppliers, regions, industries, or practices with increased risk. This will also help us stay informed about current events and public discussions surrounding modern slavery and raise our awareness, which is a proactive measure that supports taking appropriate preventive actions.

Collaboration

Queensland Government Entities Community of Practice

We continued our participation in the Queensland Government Entities Modern Slavery Community of Practice (**CoP**) to share learnings and best practices and improve collaboration. We leverage the CoP as an opportunity to share knowledge, experiences and information related to modern slavery programs of work, develop our knowledge in this space, identify opportunities for shared resources and cost savings and find opportunities to reduce duplication of effort.

Energy Procurement Supply Association (EPSA)

Powerlink is a member of EPSA which is a not-for-profit association consisting of representatives from energy industry corporations from the Asia-Pacific region. The EPSA Modern Slavery sub-committee was formed to facilitate collaboration between EPSA member organisations and develop a standardised approach to supplier engagement on modern slavery.

During the reporting period, we continued to participate in EPSA meetings and remained engaged with the EPSA consortium on supplier resources and platform improvements. This included exploring potential options for including additional supply chain tiers in assessments, improvement of due diligence processes, refining our supplier assessment questionnaires and leveraging EPSA connections and knowledge to enhance Powerlink's response to modern slavery.

Effectiveness assessment

Powerlink recognises the importance of developing a clear reporting framework to measure the effectiveness of our approach to addressing modern slavery risks and to enable a program of continuous improvement.

We recognise there is much more for us to do in this space in terms of developing clear mechanisms to assess the effectiveness of our actions. We will prioritise this during future years.

More specifically, work planned for future years includes developing key performance indicators to measure the effectiveness of our actions. The metrics will include a mix of aspects in relation to our internal operations and supply chain, such as training participation, engagement feedback, supplier risk assessments and complaints received.

Consultation and engagement

The consultation process for this Statement was managed by Powerlink's cross-functional Anti-Slavery Working Group, and involved the following stakeholders:

- QCN (Powerlink subsidiary), CopperString 2.0 (Powerlink subsidiary)
- Operational, Infrastructure and Service Delivery units
- Legal and Risk units
- People and Culture units
- IT and Technology Solutions units
- Internal and External Communications units
- Supply Chain units

The remit of the Working Group is to develop, review and refine Powerlink's response to modern slavery as a continuing journey.

Where possible and permitted by law, Powerlink seeks to work in collaboration with industry-wide initiatives and peer organisations to share initiatives and information, scale impact, and promote a coordinated approach to managing modern slavery risks.

Our commitments going forward

With dedicated resourcing in place, we have the opportunity to build further on our modern slavery program. We have identified eight key pillars (focus areas) for FY2024/25. We believe the identification of essential pillars is an important step in implementing focused, effective and measurable key controls for ongoing modern slavery risk mitigation.

FY2024/25 focus areas

Pillar	FY2024/25 actions
Governance	Ongoing review and improvement of Powerlink frameworks, standards and procedures to increase their effectiveness in helping us manage Powerlink's modern slavery risks.
Capability uplift	Undertake dedicated training efforts within Powerlink aimed towards improving knowledge and awareness of modern slavery issues including refreshing Powerlink's existing modern slavery training module. Design and implement supplier engagement and awareness initiatives based on insights from supply chain risk assessment.
Supply chain risk assessment and due diligence	Formalise a strategy for modern slavery risk assessment of our supply chain and associated due diligence activities to guide our work in this space. Application of consistent and structured due diligence processes coupled with supplier engagement activities aligned to Powerlink's strategy for modern slavery risk assessment of its supply chain.
Remediation	Investigate industry best practice in the application of procedures for development and implementation of corrective action plans.
Collaboration	Continue our collaboration with industry peers to identify best-practice approaches to modern slavery due diligence in the supply chain and research ways to maximise our collective impact in this area.
Reporting	Establish reporting on measuring effectiveness of actions.

Compliance with mandatory criteria as outlined in the *Modern Slavery Act 2018 (Cth), s16(1)*

Mandatory Reporting Criteria	Section	Pages
Identify each reporting entity covered by the joint statement	About this Statement	3
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	Our business, Our supply chain	4-12
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	Modern slavery risks	13-14
Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Our actions to assess modern slavery risks, Our commitments going forward	15-19
Any other relevant information	Our commitments going forward	19

Contact us

Registered office	33 Harold St Virginia Queensland 4014 ABN 82 078 849 233
Postal address	PO Box 1193 Virginia Queensland 4014
Telephone	+61 7 3860 2111 (during business hours)
Email	pqenquiries@powerlink.com.au
Website	powerlink.com.au
Social	