

Hydrogen
 Arrow Dampier Bunbury
 Pipeline

Multinet
 Gas Networks
 Gas Networks

Modern Slavery Statement

2021

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This Statement is a joint Modern Slavery Statement for AGIG for the reporting period 1 January 2021 - 31 December 2021.

Acknowledgement of Country

AGIG acknowledges the Traditional Custodians of the lands upon which we live and operate, and we pay our respects to Elders past, present and emerging. We recognise Aboriginal and Torres Strait Islander people's historical and ongoing connection to land and waters, and we embrace the spirit of reconciliation.



A MESSAGE

FROM THE CEO

Welcome to our Modern Slavery Statement for 2021.

At AGIG, we are committed to playing a role in ensuring that human rights are respected within business operations and supply chains. This Statement provides an overview of how we address modern slavery risks in our business, workforce and extended supply chains.

Our Vision and Values guide everything we do as a business and safety is our key priority. We apply Zero Harm Principles to ensure that our people are safe at work, and this extends to sitebased operational staff, contractors and office-based staff. We apply the same philosophy to modern slavery risks that may occur in our business and supply chains. Modern slavery risk mitigation is an aspect of our overall commitment to ESG (environment, social and governance) best practice.

Over the last year, our approach to addressing modern slavery focused on increasing our staff's awareness of the issues and helping them to understand how they can reduce the risk of modern slavery, engaging with our suppliers to communicate our expectations and requirements, carrying out supply chain due diligence activities and engaging with a wide range of subject matter experts across various areas of our business to understand the key modern slavery risks our business might face. We remain committed to continuous improvement in this developing area, in alignment with our ESG goals and our vision of being Australia's leading gas infrastructure business.

My h C.

Craig de Laine Chief Executive Officer





OUR VISION

Our vision is to be the leading gas infrastructure business in Australia...



...aiming for top quality performance on our targets

OUR VALUES

They drive our culture: how we behave and how we make decisions

Trust

We act with integrity, we do the right thing, we are safe guardians of essential Australian infrastructure. We act in a safe and professional manner



 $\circ \circ$

We treat our customers and our colleagues the way we would want to be treated, and we embrace and respect diversity



Perform

We are accountable to our customers and stakeholders, we are transparent on our performance and we deliver results. We continuously improve by bringing fresh ideas and constructive challenge



One Team We communicate

well and support each

other, and we are united

behind our shared

vision



Introduction

This modern slavery statement (Statement) is prepared and submitted in compliance with the Modern Slavery Act 2018 (Cth) (the Act). In accordance with section 14 of the Act, this Statement is a joint statement covering the reporting period 1 January 2021 to 31 December 2021, submitted by Australian Gas Infrastructure Holdings Pty Ltd (AGIH) for the following reporting entities (as that term is defined in the Act) within the AGIG group of companies (AGIG):

- Australian Gas Infrastructure Holdings Pty Ltd ABN 22 120 456 573
- Australian Gas Networks Holdings Pty Limited ABN 24 169 818 026
- Australian Gas Networks Limited ABN 19 078 551 685
- Australian Gas Networks (VIC) Pty Ltd ABN 73 085 899 001
- Multinet Gas Distribution Partnership ABN 53 634 214 009
- DBNGP (WA) Transmission Pty Limited ABN 69 081 609 190

In this statement, unless expressly mentioned otherwise, references to AGIG, the Company, we, us and our, refer to the reporting entities collectively, their subsidiaries and controlled entities. This statement does not cover our non-controlled nor non-operated joint venture operations.

AGIG is opposed to modern slavery and will not knowingly conduct business with parties that engage in modern slavery or other unethical business practices. We apply the Act's definition of "modern slavery" in our internal policies, practices and resources and our external Sustainable Procurement Standard, to communicate to all stakeholders our expectations regarding modern slavery risks.



HIGHLIGHTS

- We did not receive any complaints or reports to our independent reporting hotline of modern slavery occurrences within our business or supply chains
- We completed all of the objectives referred to in our 2020 Modern Slavery Statement ("Future actions we intend to take"), including:
 - We updated our employee Code of Conduct to incorporate AGIG's zero tolerance for all forms of modern slavery and to encourage awareness and reporting of any instances where employees become aware of the possibility of modern slavery occurring.
 - We developed and implemented a supplier standard (Sustainable Procurement Policy) that applies to all suppliers and clearly states our expectations and zero tolerance of modern slavery.
 - We amended our procurement policy to expressly state our zero tolerance for modern slavery and require compliance with the Sustainable Procurement Policy and we updated our tender documentation to include modern slavery assessment as a consideration in contract award.
 - We widened the scope of our due diligence to include ten times more suppliers in our deep dive due diligence process.
 - We directly engaged with new suppliers in the tendering phase through self-assessment questionnaires.
 - We facilitated modern slavery awareness with staff and participated in industry working groups.
 - We delivered modern slavery training to 209 employees, including all legal, commercial and procurement personnel and the executive management team.





QUICK GUIDE

TO OUR STATEMENT

Requirement of the Act	Our Statement
Identify the reporting entity, section 16(1)(a)	Introduction page 5
Describe the reporting entity's structure, operations and supply chains, section 16(1) (b)	Our Vision and Values page 4 About AGIG page 8 Our corporate structure, Our workforce, Our supply chains, Our operations and Our role in the gas industry pages 9 - 12
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity that it owns or controls, section 16(1)(c)	The risks of modern slavery in our operations and supply chain pages 13 - 16
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risk, including due diligence and remediation processes, section 16(1)(d)	The actions we have taken to assess and address the risks page 6, 17 - 20
Describe how the reporting entity assesses the effectiveness of these actions, section 16(1)(e)	How we measure the effectiveness of actions taken page 21
Describe the process of consultation with any entities the reporting entity owns or controls and the entity giving the statement, section 16(1)(f)	Collaboration page 22
Other relevant information (including COVID-19), section 16(1)(g)	Impact of COVID-19 pandemic page 22
Details of approval by the relevant principal governing bodies, section 16(2)(b)	Sign-off l page 23



We are Australian Gas Infrastructure Group

One of Australia's largest gas infrastructure businesses

Our vision is to be the leading gas infrastructure business in Australia. We will achieve this by delivering for our customers, being a good employer and being sustainably cost efficient. We own and operate infrastructure that delivers gas to Australian homes, businesses and communities. We also deliver and store gas that supports the Australian economy - for power generators, mines and manufacturers. We have commissioned an Australian-first project in renewable hydrogen production in South Australia and are working towards delivering other renewable hydrogen projects across Australia.



Operates gas infrastructure (transmission pipelines and storage) in Western Australia and the Northern Territory.

Multinet Gas Networks

Operates gas distribution in Victoria.

Australian Gas Networks

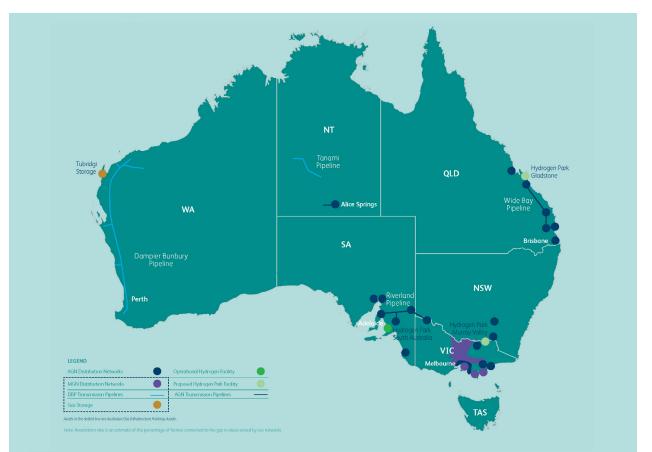
Operates gas infrastructure (distribution and transmission pipelines) in Victoria, South Australia, Queensland, New South Wales and the Northern Territory.

AGIG builds and operates infrastructure across the country.

AGIG 2021

OPERATIONS

ACROSS AUSTRALIA



South Australia

- 469,451 customers
- 31,219TJ delivered in 2021
- 90%+ penetration
- Distribution 8,295km
- Transmission 480km

New South Wales

- 61,968 customers
- 5,475TJ delivered in 2021
- 90%+ penetration
- Distribution 2,005km
- Transmission 84km

Northern Territory

- 1,165 customers
- 928TJ delivered in 2021
- Distribution 39km
- Transmission 601km

Victoria

- 1,444,696 customers
- 113,074TJ delivered in 2021
- 90%+ penetration
- Distribution 21,664 km
- Transmission 501km

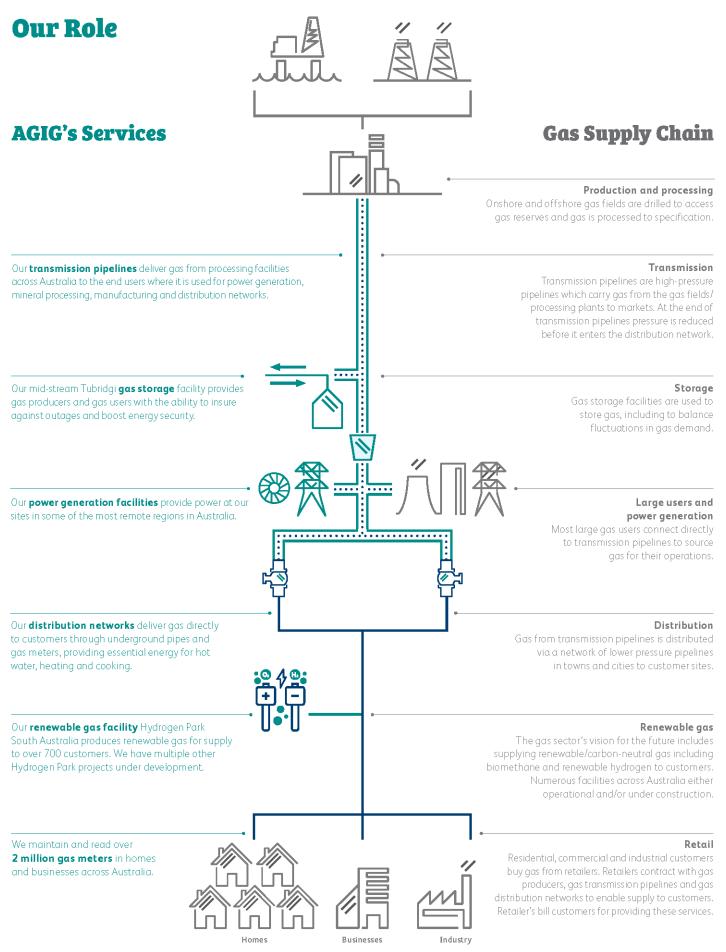
Queensland

- 108,966 customers
- 5,672TJ delivered in 2021
- 30%+ penetration
- Distribution 3,194km
- Transmission 314km

Western Australia

- 50 shippers
- Transmission 2,337km
- 60PJ gas storage





AGIG Services

Non-AGIG Services



Our Corporate Structure

The reporting entities are managed by a single executive management team, supervised by separate Boards of Directors.

AGIH and its subsidiaries are Australian incorporated private companies with registered offices in Perth and Adelaide. AGIH is ultimately owned by a consortium made up of CK Infrastructure Holdings Limited, CK Asset Holdings Limited and Power Asset Holdings Limited.

AGNH and its subsidiaries are Australian incorporated private companies with registered offices in Adelaide (with the exception of one non-operational subsidiary that is incorporated overseas). AGNH is ultimately owned by CK Infrastructure Holdings Limited, CK Hutchinson Holdings Limited and Power Asset Holdings Limited.

For further information on our executive management team, corporate structure or ownership, please see our website: <u>https://www.agig.com.au/</u>

CK Infrastructure Holdings Limited, CK Asset Holdings Limited and Power Asset Holdings Limited are offshore foreign entities that do not need to report under the Act. However, CK Infrastructure Holdings Limited submits a modern slavery and human trafficking statement under the UK Modern Slavery Act 2015. CK Infrastructure Holdings Limited also publishes a Modern Slavery and Human Trafficking Statement and a Sustainability Policy.

To review these policies please see:

modern_slavery_and_human_trafficking_
statement.pdf

https://www.cki.com.hk/english/sustainability/ sustainability_policy/index.htm



WORKFORCE

OUR PEOPLE

We employ approximately 382 employees across Australia (on full time and part-time bases). The average age of AGIG employees is 46 years and 31% of our employees are female. We do not employ any staff under the legal age for work in Australia. We also have more than 1,600 contractors working for our business.

SUPPLY CHAINS

Due to the nature of our operations and business, our supply chains are diverse, international and multi-tiered. We manage group procurement through a centralised procurement function and we manage our supplier base through collaboration between procurement, finance and asset management teams, working with legal advisors and contract owners.

On an annual basis, we contract directly with over a thousand suppliers. We require our direct suppliers to ensure that, in their supply chains, Australian suppliers are given full, fair and reasonable opportunity to supply goods or services that comprise part of or all of the goods and services delivered to us. For some of our projects we also have Australian Industry Participation Plans (AIPP) that we require our suppliers to consider and comply with. For example, our Hydrogen Park Murray Valley project AIPP is available on our supplier website, <u>here.</u>

As set out in this Statement, we have undertaken due diligence that analyses the risks of modern slavery arising in our top 500 suppliers (determined by value of our spend). See pages 13 - 16 for further information.







The risks of modern slavery in our operations and supply chain

To understand the risk of modern slavery arising in our operations and supply chains we have adopted a four step process:

- Used information from our procurement teams to identify our top suppliers by value of spend and critical suppliers based on product supplied, and used publicly available sources¹ to consider the regions, industries, goods and services that have the highest risks within our supply chain and operations;
- Adopted a risk-based approach to prioritise our due diligence activities, focusing our efforts on our top 500 suppliers by value and our key suppliers by product (based on the relative importance of the product supplied to our operations);
- Engaged an external consultant to perform supply chain mapping and a deep dive due diligence exercise, using our top 500 suppliers (by value) using proprietary technology to analyse ten tiers down the supply chain of each of those suppliers. We also engaged the same external consultant on an ad hoc basis throughout the year

to assist with due diligence on critical components.

• Used the results of the supply chain mapping and due diligence to understand our highest risks regions, products and suppliers and considered these risks in procurement decision making and briefings to our senior management team and executive.

https://www.walkfree.org/projects/business-and-investortoolkit/

https://www.responsiblesourcingtool.org/explorerisk https://www.transparency.org/en/cpi# https://knowthechain.org/



^{1.} Resources used include:

IN SUMMARY

Applying these four steps, we have identified the following risks of modern slavery practices in our operations and supply chains:

- At operational sites, owned and operated by AGIG, we have not identified any actual incidences of forced labour or servitude within the workforce comprised of our direct employees. Our governance framework, including the AGIG Equal **Employment Opportunity Policy and Zero** Harm Principles, Fraud and Corruption Prevention and Whistleblowing Policy, as well as our compliance with requirements of Australian law (particularly with regard to workplace health and safety and employment), minimise the risk of forced labour or servitude occurring. We have a strong culture of reporting workplace health and safety incidences. To date, no reports of incidences of modern slavery occurring on an AGIG operational site have been received.
- Our due diligence found that there is a risk of modern slavery occurring indirectly in our supply chains. This arises from the breadth and depth of our supply chains that extend internationally (particularly into South East Asia, a high risk region), across a number of industries (particularly the high risk manufacturing and construction industries) with multiple tiers.
- The modern slavery risk assessment undertaken uses a multi-regional inputoutput (MRIO) table developed by independent external consultants, Fair

Supply Analytics Pty Limited, to map the supply chain of the industries and countries for each item of spend. The MRIO table links 15,909 sectors across 190 countries and holds raw data drawn from the UN's System of National Accounts and COMTRADE databases, Eurostat, IDE/JETRO, and numerous national agencies. This process identifies the inputs required from different industries in different countries around the world to produce the demand represented by the first tier. The methodology used maps the supply chain up to 10 tiers of inputs.

- We set out below summaries of the findings of our due diligence. Note that none of the information contained in this Statement or obtained through due diligence confirms the existence, or nonexistence, of any actual incidence of modern slavery.
- Looking deeper, our due diligence finds that the highest risk of modern slavery in our supply chains occurs in the non-building construction industry, with the greatest risk region theoretically being Australia. These results are consistent with the results of due diligence we carried out in our 2020 Modern Slavery Statement, and indicative of the nature of our major suppliers being Australian companies, providing nonbuilding construction labour (e.g. gas services) to our Australian operations. Our due diligence also illustrates that the



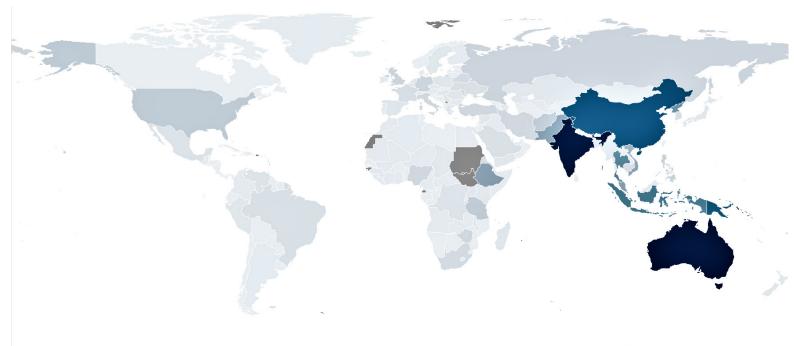
highest risk of modern slavery occurs within the second tier of our suppliers' supply chains. These results help us to prioritise further due diligence efforts with Australian suppliers, particularly in the non-building construction industry, and to focus our risk mitigation efforts on reaching tier 2 of our suppliers' supply chains.

RISKS

BY REGION

Our due diligence identified the countries with the highest risk of modern slavery, aggregated across the top 500 suppliers in our supply chain (based on the amount we spend with particular suppliers). The shaded countries indicate the top risks.

The five regions noted as having the greatest risk are: Australia, India, China, PNG and Indonesia.





The identification of the regions above as risk priority areas for the purpose of compliance with the Act does not confirm the existence or non-existence of modern slavery within the supply chains of suppliers or organisations carrying out business in those regions. However, identification of the regions as risk priority areas provides the basis for further due diligence we will undertake.



RISKS BY INDUSTRY

Our due diligence identified the following industries as the top 4 industries with the highest risk of modern slavery in their respective supply chains (based on the amounts that we spend with suppliers in the respective industries):

- Non-building construction and civil works
- Other services (software, IT, catering, cleaning, security, clothing supply and office stationery)
- Wholesale trade
- Metal products

RISKS BY TIER OF OUR SUPPLY CHAIN

Our due diligence identified the greatest risk of modern slavery occurs within Tier 2 of our supply chains. It by no means illustrates a known population but is rather an extrapolation to identify modern slavery risks for the purposes of compliance with section 16(1)(b) of the Act.

Note that the risks by region, tier and industry were assessed by independent external consultants, Fair Supply Analytics Pty Limited.

RISK FACTORS

In undertaking our desk-top analysis, we considered the following factors known to exacerbate modern slavery risk:

- Prolonged COVID-19 related supply chain risks and the impacts of COVID-19 on changes to working environments and inability to perform in person audits.
- Issues associated with region such as lack of regulation or enforcement agencies, poor track record on corruption and human rights, prevalence of criminal organisations, weak labour regulations and law.
- Issues associated with industry such as vulnerable workforces (low skilled, temporary jobs, poverty, migrants), long and complex supply chains, labour intensive industry.
- Issues associated with the supplier such as prevalence of labour issues or controversies (eg delayed payments, failure to meet labour regulations, discrimination of employees) and use of state sanctioned forced labour, high use of third party recruitment agencies.
- Issues associated with procurement practices such as cost cutting, tight deadlines, demand for cheaper goods and services.
- The ongoing international concern in relation to products that may be tainted by Uyghur forced labour within the autonomous Xinjiang region of China.





The actions we have taken to assess and address the risks

During this reporting period, the actions we have taken to assess and address the risks include:

- We focused our attention on educating staff, raising awareness, amending procurement practices and template contracts and engaging with our executive management team on modern slavery risks.
- We developed a bespoke training pack, specific to our business, and rolled this out to all legal, corporate services, procurement and commercial teams. This training was completed by 209 people.
- We reviewed our long term contracts with incumbent contractors to identify contracts that needed variations to include modern slavery clauses and we engaged with those incumbent suppliers to amend relevant contracts.
- We worked with external consultants FairSupply to perform deep dive analysis on various suppliers throughout the year, to ensure that adequate information was provided to the executive management team prior to making recommendations on preferred suppliers.
- We maintained the AGIG reporting hotline, which is a grievance mechanism for employees, contractors and suppliers to confidentially raise concerns about unethical conduct such as modern slavery. We encourage reporting to support a culture of honest and ethical behaviour, corporate compliance and good corporate governance. During the reporting period, zero reports of modern slavery concerns were reported to the grievance hotline.



AGIG 2021

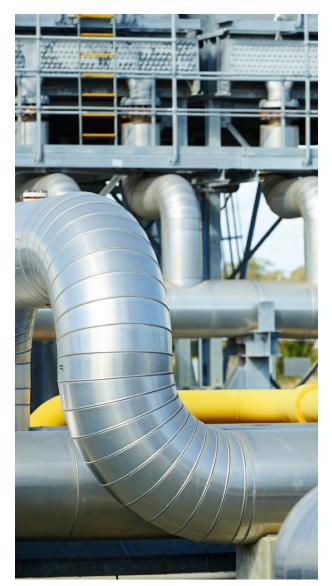
FUTURE ACTIONS

WE INTEND TO TAKE

The future actions we intend to take include:

- Facilitate greater one on one interactions with suppliers identified through our due diligence as higher risk to greater understand the risks and assess our ability to impact change;
- Embed our modern slavery due diligence within our ESG practices and integrate modern slavery reporting with ESG reporting;
- In March 2022 we established an Environmental, Social Governance (ESG) Committee. Going forward the ESG Committee will have oversight of the Modern Slavery risks and reporting and provide periodic updates to the Boards;
- Amend our procurement practices to capture modern slavery assessments in the initial request form to commence an invitation to tender, to provide our executive management team assurance that modern slavery assessment is consistently undertaken;
- Develop a strategic procurement approach for critical equipment and parts required for renewable gas projects that incorporates modern slavery criteria, to embed modern slavery due diligence within our corporate strategy and align with our vision and values;
- Continue to engage with suppliers through self-assessment questionnaires and revise our procurement practices to ensure suppliers respond to those questions prior to being on-boarded;

- Increase our collaboration with sister companies and industry working groups; and
- Continue to deliver and refresh modern slavery training to employees and consider providing this to high risk suppliers.







Australian Gas Infrastructure Group

Hydrogen is a sustainable, zero emission gas of the future.



Case Study: Renewable Gas

Our board endorsed low-carbon strategy is to target 10% (by volume) renewable gas in our distribution networks by 2030 and full decarbonisation of our distribution networks by 2040 as a stretch target and by no later than 2050.

Key to our low carbon strategy is the development of hydrogen projects and we are involved in multiple globally significant hydrogen production projects across Australia. We understand that the pace and demand for renewable energy technology required for the energy transition poses unique risks to human rights, exacerbated by the need to develop the hydrogen economy in the most cost effective way possible in order to bring the industry to scale. We set out below an explanation of the robust modern slavery due diligence we integrated into our hydrogen project procurement strategy in 2021.

As the lead developer on one of our hydrogen development projects, we ran a competitive tender for the supply of a crucial piece of equipment needed to produce hydrogen. After months of technical and commercial assessment, we shortlisted a number of suppliers. During the tender, each supplier was asked to respond to our business ethics questionnaire, which includes questions related to modern slavery. From these responses, our procurement team noted various modern slavery red flags that required further investigation, including: price differences between suppliers, locations of manufacturing, risks associated with state owned entities, and lack of supply chain transparency or gaps in information provided.

Our procurement team engaged an external consultant to run a detailed due diligence on shortlisted suppliers to help us better understand these risks and to identify potential strategies to address and mitigate those risks. These enquiries led to a deep engagement with suppliers to understand where components within the equipment being supplied were manufactured (particularly components such as electronics, microchips and power supply units) and to address the gaps in information provided by suppliers that was out of date or incomplete.



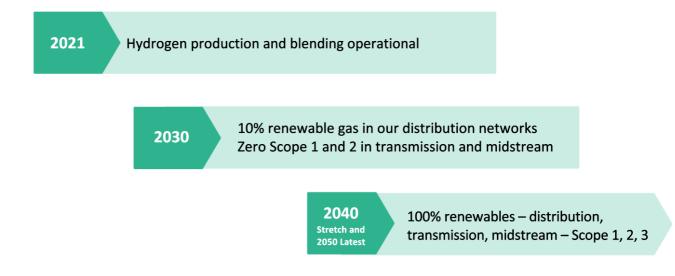
CASE STUDY RENEWABLE GAS

CONTINUED...

The results of the due diligence were analysed by the procurement, commercial and legal teams. These results were presented to our executive management team to provide guidance on the selection of tenderer.

Ultimately, the modern slavery due diligence was a determinative factor in our final supplier selection. The chosen supplier provided assurances on modern slavery risks that were highly valued. Not only did this exercise influence the selection of a supplier for this particular tender, lessons learnt will apply to other tenders we run and have triggered significant changes to our procurement practices to further prioritise modern slavery (and wider business ethics) analysis.

OUR LOW CARBON STRATEGY







How we measure the effectiveness of actions taken to assess and address the modern slavery risks

At AGIG, modern slavery issue have been previously overseen by the Risk and Compliance Committees, and going forward by our newly-established ESG committee. Any high risk issues are reported to executive management and Boards. In our first Modern Slavery Statement (2020), we committed to report on certain key metrics, in order to measure the effectiveness of our actions to assess and address modern slavery risks. We set out in the table below the results for these metrics for 2021.

Based on the results reported below, we consider that our actions taken to assess and address modern slavery risks have been effective, but as always there is more that can be done in this evolving area. We remain committed to continuous improvement and will report on these metrics in future modern slavery statements.

Reportable Metric	Result
The number of modern slavery grievances reported to our reporting hotline	0
The number of employees that completed modern slavery training	209
The number of suppliers we directly engaged with to vary existing contracts to include contractual requirements relating to modern slavery avoidance	14
The number of instances where contracts have been terminated due to modern slavery concerns	0
The number of instances where modern slavery concerns identified in the pre-contractual, procurement due diligence process were escalated to the executive management team prior to contract award	2



COLLABORATION

This Statement was prepared jointly by the reporting entities. The ESG Committees of the reporting entities has recommended the Statement and each of the relevant Boards has approved and provided sign-off (see page 23 of this Statement).

We also prioritise collaboration with our related entities and sister companies, in Australia and abroad, to share learnings and enhance collective effectiveness and impact. We facilitate and encourage collaboration with industry groups and we encouraged our staff to increase their awareness and understanding of the prevalence of modern slavery in their personal lives by hosting a modern slavery awareness morning tea with an external industry expert and by providing our staff information on how they could have a slavery free Easter and Christmas.

IMPACT OF COVID-19

OUR SUPPLY CHAINS AND WORKFORCE

The COVID-19 pandemic and lockdowns continued to exacerbate modern slavery risks globally. Our supply chains experienced disruptions and our operations faced challenges with lack of available personnel (particularly where international expertise was required but unavailable due to travel restrictions). Further, as we operate in a critical industry, we had personnel working through COVID lockdowns in accordance with state and federal government mandates.

Our focus on clear and timely communications with our employees, contractors and suppliers has been essential in managing the various challenges that COVID-19 has presented. We have managed to ensure the safety of staff on sites through implementation of social distancing protocols, increasing hygiene requirements and facilities and encouraging our staff and contractors to get vaccinated.

The COVID-19 pandemic continues to pose restrictions on our ability to carry out on-site audit activities in relation to facilities occupied by our suppliers (due to the health and safety risks this could pose and travel restrictions). In these circumstances, our process of desktop due diligence has been helpful to ensure we could adequately assess modern slavery risks.



SIGN OFF

This Statement was endorsed by the ESG Committee and approved by the Board of Australian Gas Infrastructure Holdings Pty Limited on 9 June 2022.

SIGNATURE OF DIRECTOR:

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This Statement was endorsed by the ESG Committee and approved by the Board of Australian Gas Networks Holdings Pty Limited on 9 June 2022.

SIGNATURE OF CHAIRMAN:





Hydrogen Dampier Bunbury
 Pipeline



