

Important information

Origin Energy Limited is an Australian company (ACN 000 051 696), registered in New South Wales.¹

We are a leading provider of energy to homes and businesses with interests across energy exploration, production, power generation and retailing. We have extensive operations across Australia. We have prepared this joint Modern Slavery Statement (Statement) in line with the requirements of the *Modern Slavery Act 2018* (Cth). It explains the actions we have taken to assess and address modern slavery risk exposures in our operations and supply chains during the financial year ending 30 June 2024 (FY24).²

We also hold a 27.5 per cent share in the incorporated joint venture Australia Pacific LNG Pty Limited (Australia Pacific LNG) and act as upstream operator, CSG marketing agent and corporate services provider to the joint venture. Origin's operations and supply chains as upstream operator CSG marketing agent and corporate services provider for Australia Pacific LNG are included in the scope of this Statement. The Reporting Entities (as defined by the Modern Slavery Act 2018 (Cth)) and covered by this Statement are listed in Appendix A.

Refer to our Annual Report and Sustainability Report for further details, including our list of controlled entities.

As at 30 June 2024, Origin had 5,615 employees and 282 external contractors, based in Australia, and one based in Vietnam. Origin also has a philanthropic foundation, the Origin Energy Foundation, which focuses on programs that use education to help break the cycle of disadvantage for young Australians.

This report may reference significant events occurring after 30 June 2024. Where this report contains forward-looking statements, including statements of current intention, statements of opinion, and predictions as to possible future events and future financial prospects, these statements are not statements of fact and there can be no certainty of outcome in relation to the matters to which the statements relate.

Forward-looking statements involve known and unknown risks, uncertainties, assumptions and other important factors that could cause the actual outcomes to be materially different from the events, or results expressed or implied by such statements, and the outcomes are not all within Origin's control. Statements about past performance are not necessarily indicative of future performance.

¹ In this statement a reference to 'Origin', 'Origin Energy', 'Group', 'Origin Group', 'Company', 'we', and 'our' is to Origin Energy Limited and the entities listed in Appendix A.

² As defined in the Modern Slavery Act 2018 (Cth) Guidance for Reporting Entities to include: trafficking in persons; slavery; servitude; forced labour; debt bondage; forced marriage; worst forms of child labour; and deceptive recruiting for labour or services.

Message from our CEO



I am pleased to bring you Origin's fifth Modern Slavery Statement.

Modern slavery is a global issue and a serious violation of an individual's dignity and human rights. It can include human trafficking, slavery, servitude, forced labour and debt bondage, which are serious crimes under Australian and international law.

We recognise the priority given in the United Nations Guiding Principles on Business and Human Rights to the protection of people from risk. Our plan focuses on building our understanding of risks and capabilities in managing them, improving our policies and processes, and enhancing engagement with our suppliers.

As one of Australia's leading energy companies with activities spanning retailing, power generation, renewables and storage development, and natural gas production, Origin is mindful of how our decisions can impact others.

Our ambition is to lead the energy transition through cleaner energy and customer solutions. We seek to proactively address risk within our operations and supply chains including from renewable technologies manufactured offshore, which may contain materials from exploitative practices.

To reduce that risk within our supply chain we worked closely with a small number of renewable suppliers in FY24 to better understand their supply chains, risk exposure and policies they have in place to monitor and actively address this issue.

In FY24, we:

- continued to analyse and review suppliers of goods and services to identify modern slavery risk factors;
- reviewed 300 suppliers with a higher inherent risk exposure to modern slavery type practices through the Informed365 platform; and
- assessed nearly 40,000 of Origin's purchase orders, to understand where blind spots in our materiality threshold could make us susceptible to modern slavery practices, particularly where we are making lower-value, high-volume purchases.

I present this statement of our activities as part of our broader commitment to work with governments, and our suppliers and stakeholders to address modern slavery.

Frank Calabria
Chief Executive Officer
August 2024

About Origin



Who we are

Since listing on the Australian Securities Exchange in 2000, Origin has grown to become one of the largest energy retailers in Australia. We are one of the country's most significant electricity generators and a major contributor to the domestic economy. At 30 June 2024, we had 5,616 employees as well as 282 contractors.

We have an important role to play in providing energy, including electricity, natural gas, solar and liquefied petroleum gas (LPG), to more than 4.7 million customer accounts and we work every day to make energy smarter, easier and more sustainable and affordable.

As a leading Australian energy company, we recognise we have an important role to play in the transition to a low-emissions future. Our ambition is to lead the energy transition through cleaner energy and customer solutions. Our long-term ambition is to achieve net zero Scope 1, 2 and 3 emissions by 2050.¹

As well as providing energy, we contribute to local, regional and national communities by paying taxes, providing jobs, purchasing from local suppliers and investing in local infrastructure. We support community initiatives and help to build community skills and employment opportunities through activities such as apprenticeship schemes.



Through our philanthropic foundation, the Origin Energy Foundation, we support programs that use education to help break the cycle of disadvantage and empower young Australians to reach their potential. Since the Foundation's inception in 2010, it has contributed more than \$40 million to the Australian community to meet these objectives.

For further information on how Origin contributes more broadly to our community, including the work of the Origin Energy Foundation, please see our 2024 Sustainability Report.



Our values

Our values help guide how we make decisions, balance priorities and work together.

 <p>Work as one team, one Origin</p>	 <p>Be the customer champion</p>	 <p>Care about our impact</p>	 <p>Being accountable</p>	 <p>Find a better way</p>
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¹ Aligned with our Climate Transition Action Plan

Our structure and operations



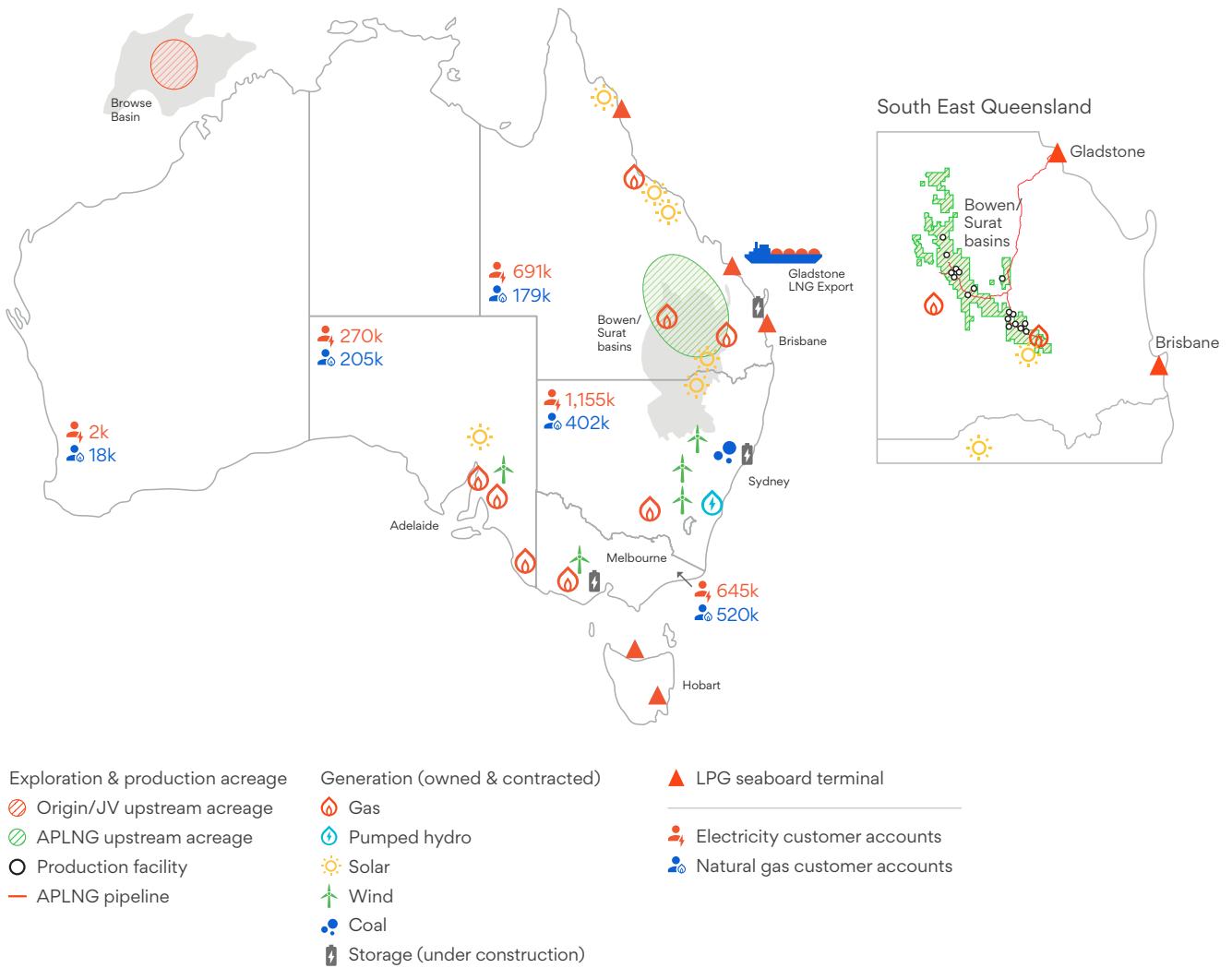
Origin has operations across Australia.

For the purposes of this Statement and in accordance with the *Modern Slavery Act 2018* (Cth), references to our operations include:

- Our direct operations^{1,2} and philanthropic activities, including our employees and external contractors who operate our business and the employment conditions under which they work.
- Our operations as upstream operator of our joint venture in Australia Pacific LNG.

Further detail regarding our workforce composition is available within our 2024 Sustainability Performance Data, including:

- Geographic distribution
- Employees by employment type/contract
- Gender diversity
- Collective Bargaining Agreement coverage
- Indigenous employees



¹ Contracted solar and contracted wind farms do not form part of Origin's direct operations.

² Our direct operations include recently acquired businesses. All acquisitions are subject to due diligence and risk-based evaluation, with an approach proportionate to their risk exposure.

Our governance



Everyone at Origin is required to act in accordance with the highest standards of personal safety and environmental performance, governance and business conduct.

The Origin Board is supported by its committees in the oversight of sustainability-related risks and opportunities. The Safety and Sustainability Committee supports and advises the Board on Origin's strategies and monitors performance of matters and commitments related to safety and sustainability. This includes health, safety and environment, climate change, human rights, communities, cultural heritage, social impact, compliance, assurance, learning and disclosures. The Board & Risk Committee has responsibility for strategic and emerging risks, including climate change risk. The Board Audit Committee has responsibility of the adequacy of Origin's reporting and internal controls.

Further information on our governance framework, including governance around climate-related risks and risk management, can be found in our Corporate Governance Statement, Safety and Sustainability Committee Charter, Audit Committee Charter & Risk Committee Charter and in our Management approaches.

Our corporate governance approach for modern slavery

Origin Board

Responsible for approval of annual Modern Slavery Statement disclosure

Safety & Sustainability Committee (CEO and non-executive Directors)

Oversight and responsibility for modern slavery governance and disclosures

Executive Leadership Team

Assigns responsibilities and monitors risks

Chief Financial Officer

Executive sponsor

Modern Slavery Working Group

Governing forum to manage delivery of key modern slavery activities and actions

Business Units

Responsible for identifying modern slavery risks and implementing required processes and controls

Origin has policies that set out expectations around conduct and how we manage risks and opportunities, including topics such as anti-bribery and corruption, diversity, and human rights. Key policies can be found at originenergy.com.au/governance.

The following policies and procedures relate to identifying, assessing and addressing modern slavery risks:

- Code of Conduct
- Risk Management Policy
- Anti-bribery & Corruption Policy
- Whistleblower Policy
- Procurement and Contract Management Directive
- Human Rights Policy
- Human Rights Remediation Guide
- Our Supplier Code
- Supplier self-assessment questionnaire (SAQ)
- Modern Slavery Risk Assessment (MSRA) Procedure
- Escalating a Concern Procedure
- Discrimination, Harassment and Bullying Policy
- Sexual Harassment and Sex Discrimination Directive
- Taking Leave Directive
- National Injury Management Return to Work Program Procedure
- Remuneration and Superannuation Directive
- Supply Chain Traceability (SCT) Tool
- Social Audit Protocol

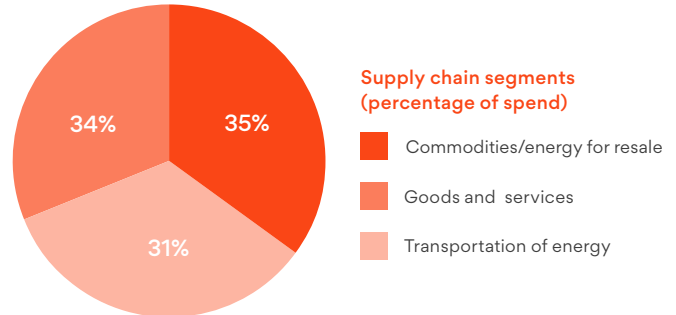
Our supply chain



Suppliers are important to all aspects of our business. They provide us with the goods and services we need that support us to deliver affordable, reliable and cleaner energy solutions to our customers.

Our supply chain is comprised of the procurement of goods and services, commodities and the transportation of energy. It encompasses around 3,900 direct suppliers with which we spent about \$10.5 billion in FY24.¹ Of these, around 3,200 suppliers are direct suppliers of goods and services.

- Our goods and services suppliers include a wide range of categories including, wellheads, drilling and power generation equipment, hardware, safety equipment, solar panels, home batteries, personal protective equipment/workwear, call centres, facilities maintenance and construction services.
- Our suppliers of commodities and energy include producers of coal, gas, LPG for resale and renewable energy.
- Transportation of energy to customers including shipping, pipelines, energy distribution and network fees.



While we have a global supply chain, 92 per cent of our direct spend is with organisations registered in Australia. We recognise the extended supply chains of our Australian registered suppliers may contain materials that potentially expose us to exploitative practices in offshore jurisdictions where they are typically manufactured.

Table 1: Inherent modern slavery risk of top 5 countries of direct goods and services suppliers

#	Sourcing countries	Prevalence ¹ (/1,000 people)	Vulnerability ¹ (%)	Supplier count (%)
1	Australia	1.6	7	94%
2	United States	3.3	25	3%
3	United Kingdom	1.8	14	1%
4	Singapore	2.1	24	<1%
5	Finland	1.4	5	<1%

¹ Global Slavery Index.

¹ Supply chain spend is approximate, annualised third-party spend, including commodity related transactions and excluding taxes, government charges, joint ventures, intercompany transfers and landowner compensation payments. It includes 100 per cent of our spend as upstream operator of Australia Pacific LNG.

Our approach



Our operations

Origin acknowledges the United Nations Guiding Principles to protect, respect and remedy human rights as well as the International Bill of Rights (including the Universal Declaration of Human Rights) and the eight fundamental Conventions of the International Labour Organisation (ILO), as reflected in our Human Rights Policy.

We respect fundamental human rights by conducting ourselves and our business with due care and in accordance with relevant laws and regulations.

In FY23, we undertook an internal assessment of our salient human rights issues, supported by an external human rights expert review, where labour rights including modern slavery was confirmed as a key focus. This assessment helped us prioritise areas of focus across our operations and supply chain in FY24.

Our supply chain

Our Supplier Code sets out our expectation that suppliers comply with all applicable laws. Suppliers must also demonstrate their respect for, and protection of, the fundamental human and labour rights of workers.

In relation to modern slavery, our Supplier Code requires that all workers have:

- freely chosen employment, with no deceptive recruiting practices, forced, bonded or involuntary labour;
- freedom from child labour, or harsh or inhumane treatment including torture, physical and psychological abuse, slavery, servitude, trafficking of persons or forced marriage; and
- freedom to move and associate, including collective bargaining, the right to join or form trade unions (unless prohibited by applicable legislation), and no requirement or pressure to surrender government issued identification, passports or work permits.

In FY23, we released our Social Audit Protocol outlining our expectations for our supplier sites' working conditions, and human and labour rights protections. In FY24, we applied our Social Audit Protocol with five prioritised suppliers, to help us determine how effectively our suppliers comply with our Supplier Code. For more information, refer to page 19.



Our risk management process

Our four-step methodology

Management of our human rights risks, including modern slavery, is underpinned by our Human Rights Policy and Risk Management Framework, with oversight from the Origin Board Audit Committee, Risk Committee and the Safety and Sustainability Committee. For further information on our Risk Management Framework, refer to our FY24 Operating and Financial Review.

In FY24, we continued to apply our four-step methodology to assess and address modern slavery risks in our operations and supply chain.

Four-step methodology	
1.	Assess modern slavery risk factors for our operations and supply chain
2.	Prioritise focus areas within our operations and supply chain for further due diligence
3.	Take action to address the risks of modern slavery practices
4.	Review the effectiveness of our actions

This methodology is outlined below:

1 Assess modern slavery risk factors for our operations and supply chain

Origin recognises the UN Guiding Principles Reporting Framework, which illustrates the importance of considering salient human rights risks. These are human rights at risk of the most severe and likely, actual or potential, negative impact through the company's activities and business relationships.

This concept of salience directs our Risk Appetite Statement and guides our Modern Slavery Working Group and our policies and procedures, like our MSRA Procedure, SCT Tool and Social Audit Protocol.

We also recognise the UN Guiding Principles on Business and Human Rights' continuum of involvement. We understand that our operations and supply chain could cause, contribute to or be directly linked to adverse impacts to people, such as modern slavery practices. Examples of possible scenarios outlined below:

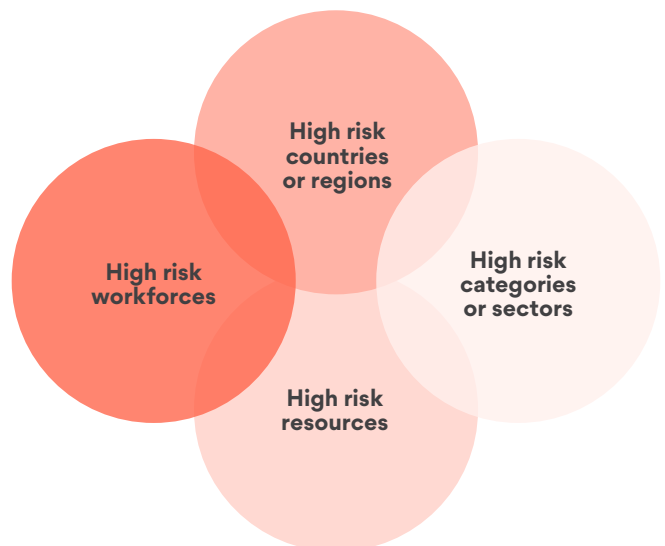
Continuum of involvement

Cause Risks that our operations may directly result in modern slavery practices	An example where Origin could cause modern slavery: Exploited labour is used as crew within shipping operations, where they are not free to leave the vessel.
Contribute Risks that our operations and/or actions in our supply chain may contribute to modern slavery; this includes acts or omissions that facilitate or incentivise modern slavery.	An example where Origin could contribute to modern slavery: A direct apparel supplier has set an unrealistic cost target and delivery timeframe that can only be met through exploited labour.
Directly linked Risks that our operations, products or services may be connected to modern slavery through the activities of another entity we have a business relationship with	An example where Origin could be directly linked to modern slavery: An indirect supplier in the extended supply chain is used to source electrical components assembled using child labour in hazardous conditions.

We have used the following modern slavery risk factors to inform our risk analysis:

- **High-risk countries of operation** - countries or regions reported to have a high prevalence of modern slavery and poorly legislated labour rights protections.
- **High-risk categories or sectors** - developing or delivering products or services that have been reported as involving labour exploitation.
- **Resources used in goods** - components used in goods that are reported to involve a high risk of labour exploitation.
- **Type of workforce and employment arrangements** - prevalence of unskilled, temporary or seasonal labour, and deceptive recruitment practices, which target vulnerable and marginalised individuals and groups.

We understand that multiple risk factors potentially influence the nature and extent of modern slavery practices, particularly when these factors intersect.



Intersecting risk

We understand that multiple risk factors potentially influence the nature and extent of modern slavery practices, particularly when these factors intersect.

Additional due diligence is undertaken to further assess our suppliers' controlled and uncontrolled issues.

Our priority risk profile

To assist us in identifying which suppliers to prioritise for increased assurance, we established a priority risk profile that considers the presence of intersecting modern slavery risk factors. This profile was developed in FY22 and is used to help us select the suppliers we engage using our SCT Tool.

2 Prioritise focus areas within our operations and supply chain for further due diligence

Our operations

Origin's operations have been assessed as having a low prevalence of modern slavery. However, we recognise modern slavery can occur in all countries, with an estimated 41,000 people living in modern slavery type conditions in Australia.¹

Our respect for fundamental human rights within our operations is acknowledged through our Human Rights Policy. We monitor ongoing alignment of our people-related directives as we continue to evolve our Human Rights Policy. We are also currently reviewing our policies and processes in the context of our salient human rights assessment.

We believe there is low risk of involvement in modern slavery relating to our workforce due to:

- our operations being based in a low-risk jurisdiction;
- our workforce profile (with low or no use of unskilled, temporary or seasonal labour);
- robust compliance processes that ensure strict adherence with all employment laws including:
 - wage compliance ensuring our employees are paid on time and in accordance with modern awards and enterprise agreements;
 - service-related entitlements including leave, termination and redundancy;
 - superannuation contributions;
 - harassment, bullying and discrimination laws including freedom of association;
 - requests for flexibility arrangements.
- strong labour rights protections within our human resources policies and procedures, enterprise agreements, training (includes topics such as timekeeping, harassment and discrimination including freedom of association, psychosocial safety), accessible grievance mechanisms (including an externally managed and anonymous whistleblowing hotline and internal reporting avenues) and risk management approach. Refer to our policies on page 7.

In FY24 we reviewed our modern slavery high-risk country list with reference to the updated 2023 Global Slavery Index and Sedex's methodology. Through our review, we did not identify any high risks associated with our current geographical operations. We continue to monitor this for changes and remain ready to undertake additional due diligence where appropriate.

We recognise that while external contractors engaged through a third party represent just five per cent of our total workforce, these external contractors can face increased inherent risk of modern slavery type practices. In FY21 we worked with our primary supplier of external contractors to assess their controls and found their processes to be mature and we continue to monitor any changes in our supply of external contractors.

Our supply chain

To better understand the potential modern slavery exposure in our supply chain we apply a variety of tools and reviews to continually assess:

- our supply chain spend;²
- our supplier SAQ results;
- our suppliers' risks and controls identified through our MSRA Procedure, SCT Tool and Social Audit Protocol;
- our suppliers' own modern slavery statements;
- business conduct data gathered through third party ESG tools and risk platforms;
- key government and non-government organisations' reporting on modern slavery trends and good practice; and
- updates of high-risk countries and categories.

In FY24, we continued to analyse and review our direct suppliers of goods and services to identify modern slavery risk factors. We applied the following principles to identify suppliers of goods and services with these risk factors, and to help inform our Modern Slavery Maturity Plan actions.

Our assessment principles include:

- **Cause vs contribute vs directly linked³** – Origin prioritises assessments in the following order:
 - instances where Origin is at risk of causing a modern slavery impact,
 - instances where Origin is at risk of contributing to a modern slavery impact,
 - instances where Origin may be directly linked to a modern slavery impact.
- **Direct vs extended supply chain** – risks that exist within Origin's supply chain where we have a direct commercial relationship are prioritised over relationships in the extended supply chain where we have less influence.
- **Location** – goods manufactured offshore in higher risk countries are prioritised over onshore manufacturing due the higher inherent risk to people working in modern slavery type practices. Onshore services known to be higher risk for modern slavery are prioritised over offshore services.
- **Materiality** – high-risk categories where the spend for the product or service is material to Origin, so we are more likely to have influence on our suppliers' supply chains.

¹ Global Slavery Index.

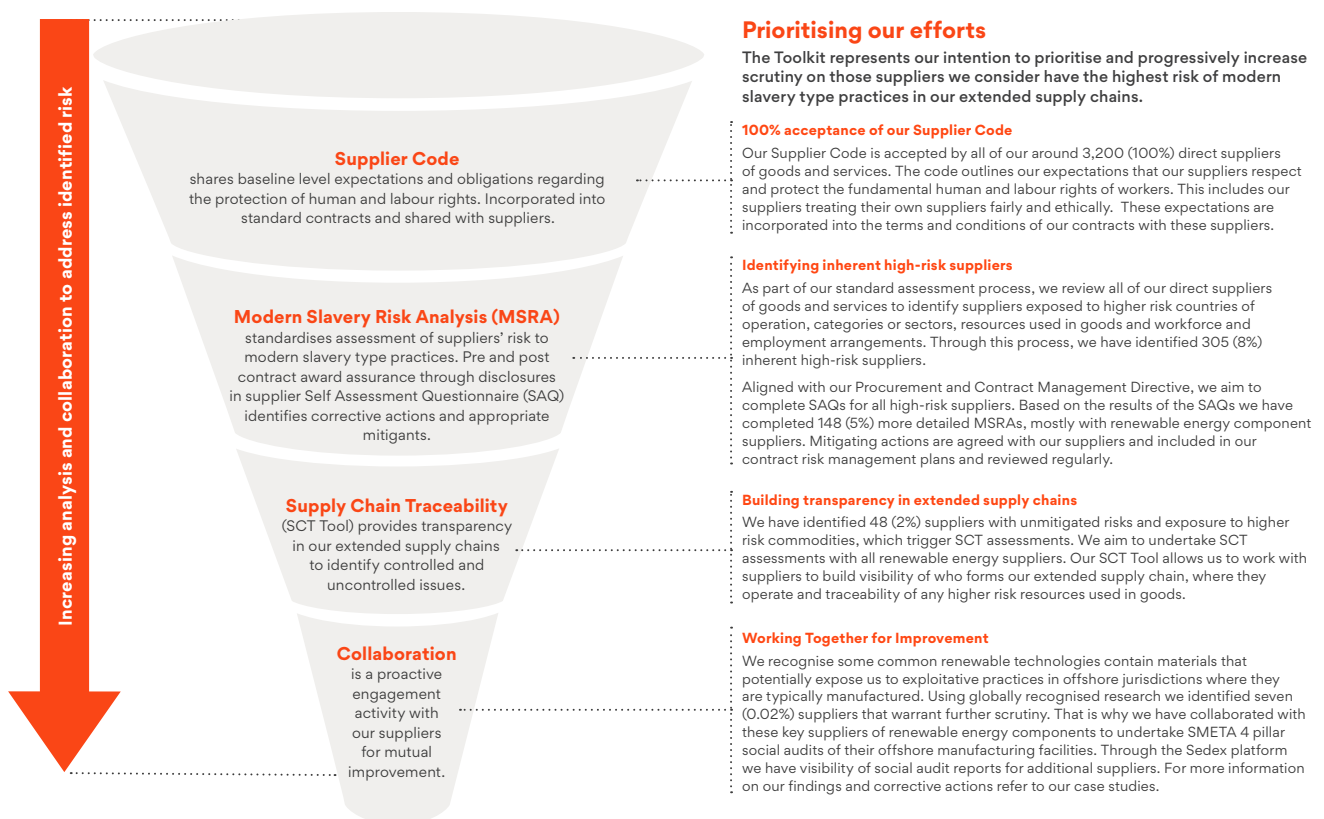
² Supply chain spend is approximate annualised third party spend excluding taxes, government charges, joint venture, intercompany transfers and landowner compensation payments.

³ Cause, contribute or directly linked in this statement are as defined in the UN Guiding Principles on Business and Human Rights.

Applying our Modern Slavery Risk Management Toolkit

Our Modern Slavery Risk Management Toolkit is designed to assess the inherent risk of modern slavery-type practices occurring within our supply chain. The Toolkit is an integrated set of tools that is applied through four stages. It provides a tiered framework for engaging with suppliers with higher inherent risk of modern slavery to determine how well they are managing the risks in their own operations and supply chain. Our toolkit allows us to perform increasingly deeper analysis at each stage, focusing our efforts on suppliers with the highest risk and where we can make the greatest positive impact in our supply chains. We aim to assess our highest risk suppliers every 3 years.

The below provides a snapshot of the four stages and our progress at each of the stages from FY22 to FY24.



Our supplier risk profiles

Through our FY24 assessments, we identified:

- **Inherent high-risk suppliers** - 305 suppliers were identified with one or more supplier risk factors, as shown in Table 2, which equates to approximately 8 per cent of our total direct suppliers. This is an increase of 34 suppliers from FY23, as we have updated our methodology in FY24 to include additional high-risk countries and materials.
- **Priority risk suppliers** - two suppliers were identified as having intersecting risk factors, which equates to less than 0.1 per cent of our total direct suppliers.

Table 2: Suppliers by risk profile grouping

Supplier Profile	Higher risk supplier profile	Number of suppliers ¹	Key high risk countries	Key categories	Modern slavery risk examples
Direct Manufacturing	Suppliers that manufacture goods in a country with higher risk of modern slavery practices	20	China, Pakistan, Russian Federation, Saudi Arabia, Vietnam	Drilling and exploration equipment, electrical equipment, renewable energy equipment	Forced labour
Indirect Manufacturing	Suppliers that distribute goods likely to be manufactured in a country with higher risk of modern slavery practices.	220	China, Vietnam	Mechanical equipment, electrical equipment, metering equipment	Forced labour
Onshore Services	Suppliers that rely on or provide a service in a category known to have a higher risk of modern slavery practices in Australia.	59	Australia	Construction, cleaning and janitorial, building maintenance and repair	Bonded labour
Offshore Services	Suppliers that rely on our supply services based in a country with higher risk of modern slavery practices.	9	China, Guinea, Papua New Guinea, Vietnam	Professional services (including IT service providers and call centres)	Deceptive recruitment practices
Commodities	Suppliers that provide goods that contain one or more commodities known to be high risk of modern slavery practices such as cobalt, lithium and polysilicon.	133	China, Democratic Republic of Congo	Emerging technology, electrical equipment, electric vehicles, and renewable energy equipment	Child labour

¹ Some suppliers appear in multiple profiles, there are 305 distinct suppliers across the 5 profiles

Supplier lifecycle management

We recognise that the components that make up goods and services and their supply chains may change and we work with suppliers to improve their ethical footprint. We acknowledge the potential to contribute to adverse impacts when pushing on price, quantity and order timeframes. A key part of our supplier relationship management is to continue to work with suppliers to assess, address and monitor risk.



We assess the supplier's modern slavery risk through the SAQ. Residual modern slavery risk for each supplier is identified and the resulting risk rating is lodged in our contract register.

Assess



We address modern slavery risks by developing a corrective action plan with our suppliers based on their assessed level of risk. The corrective action plan establishes risk management controls, which includes escalation to our ethical procurement team for specialist advice. These risks and controls are recorded in our contract register. If we are unable to agree on a control with a supplier, we flag this as a residual risk. We use our assessment and corrective action plan to decide if and how we work with a supplier to prevent and minimise modern slavery risk.

Address



Our contract owners monitor for modern slavery risks through ongoing supplier management. We review each supplier's progress against our agreed corrective action plan and lodge any updates in our contract register.

Monitor

3 Take action to address the risks of modern slavery practices

Each year, we aim to continuously build our understanding and capabilities; improve our policies and processes; and enhance our engagement with our suppliers to better identify, assess and address modern slavery risk within our own operations and supply chains.

Building our understanding and capabilities

During FY24, we improved our understanding of, and capability to manage, modern slavery risks by:

Training our team

Each year we work to equip our team members to identify, assess and address modern slavery type practices within our supply chains. In FY24 we continued to support our people across the business:

- Over 400 employees have now completed our tailored modern slavery risk management training module. The training was developed in FY23 to enhance due diligence carried out by procurement and wholesale trading team members before they award contracts;
- Our employees complete our Code of Conduct training, which includes baseline awareness of modern slavery type practices at induction;
- Over 170 employees completed contract management essentials training.

To better understand how well our team members could apply their learnings, we conducted a knowledge check of 50 participants who had completed the modern slavery risk management training module at least 30 days prior. Results demonstrated an 86 per cent retention rate of participants' ability to identify and take actions to assess and address modern slavery.

We delivered a bespoke modern slavery awareness session for our physical commodities trading team, which is responsible for sourcing materials for our energy generation portfolio, and the project investment team, which administers the Origin Investment Committee.

We supported our procurement team members to adopt our updated MSRA with specialist training sessions.

- **Executive engagement** - upskilling our Executive Leadership Team on the risks of modern slavery exposure that are deeper within the supply chains of renewable energy technologies, and looking for opportunities to mitigate them.
- **Collaborated with our peers** - we continued to engage with our industry peers to build collaborative approaches to global challenges facing the energy industry, through two key forums:
 - Human Rights Resources and Energy collaborative (HRREc), a group of Australian energy and resources companies that share learnings, and challenges and develop practical tools to identify and address modern slavery in supply chains; and
 - Clean Energy Council's (CEC) Risk of Modern Slavery Working Group, where we continue to support the CEC's Modern Slavery Pledge, which we signed in FY22.
- **Continued to review our Human Rights Policy** - to ensure ongoing effectiveness.
- **Explored opportunities to build knowledge and strengthen modern slavery risk management** - with representatives from key business functions. Our Modern Slavery Working Group met quarterly to share learnings and challenges and promote a whole-of-Origin approach in delivering against our modern slavery action plan. Key topics of discussion in FY24 included:
 - a presentation from one of our major customers with whom we have collaborated on ethical sourcing and due diligence.
 - a case study to showcase learnings from working with individual suppliers across multiple business units.
 - An update on modern slavery due diligence activities within our battery supply chains.
 - Updates from industry engagement activities and initiatives with CEC and HRREc,
 - Four sub-committees also met regularly to focus on specific actions in identifying, assessing and addressing risk to people as relevant to key business activities such as governance, procurement, commodities and shipping. The work of the Modern Slavery Working Group continues to report to Origin's Executive Leadership Team.
- **Improved our disclosure** - we met with a range of external stakeholders, such as Monash University, the Australian Council of Superannuation Investors and select industry leaders, to understand opportunities to improve our statement and undertake internal reviews.

Improving our policies and processes

We improved and simplified our existing processes and expanded the coverage of our practices to new areas of our operations and supply chain:

- **Sharing and improving** - we contributed to NSW Anti-slavery Commissioner's published modern slavery guidance and on a proposed Code of Practice to manage modern slavery risks in renewable energy value chains through HRREc and CEC working groups.
- **Simplified our MSRA procedure** - we worked with end users of our tools, such as procurement team members, to simplify when and how the procedures need to be initiated to identify and assess modern slavery risk as well as how to address the risk.
- **Boosted the use of our modern slavery risk assessment toolkit** - we integrated the toolkit into broader assessment frameworks. There is now a requirement to assess modern slavery risk within our renewable development pathway for Origin Investment Committee decision-making. We have also embedded the ethical procurement team within the due diligence team for acquisitions.
- **Improved labour rights assessments** - by utilising a preferred provider, and undertaking health and safety assessments, for the installation of solar panels in our Origin Zero business.
- **Engaged specialist consulting advice** - an external consultant helped us to improve our risk assessment processes and complete benchmark and gap analysis assessment of key suppliers.
- **Developed new tools** - to strengthen our modern slavery risk assessment toolkit, we developed two new tools:
 - Cause and Control Library to simplify analysis and assessment of a supplier's controls across 12 risk indicators by clearly defining expectations of supplier's controls and allow for consistent evaluation of maturity of these controls.
 - Product Scorecards to illustrate the commercial aspects, design and quality, technical specifications, human rights controls and environment and emissions criteria specifically for renewable energy products.
- **Undertook assurance activities** - to test the effectiveness of our modern slavery risk management framework through consistency of application, coverage and appropriateness (see case study on page 16).
- **Strengthened escalation pathways** - more than 50 assessments have been escalated to our ethical procurement team for specialist support.
- **Updated our high-risk country list** - with reference to the 2023 Global Slavery Index and Sedex's methodology, we refreshed our list of countries that pose a higher inherent risk to modern slavery type practices.
- **Reviewed our high-risk category and commodity lists** - with reference to Sedex's methodology, as well as other external guides, we continue to review the materials that make up goods we buy and that pose a higher inherent risk to modern slavery type practices deeper within our extended supply chains.
- **Assessed commodities purchases** - updates to our Know Your Counterparty procedure and onboarding documentation have improved transparency of counterparty modern slavery risk management.

Enhancing engagement with our suppliers

We continued to work with suppliers of solar panels, batteries, wind turbines and inverters to build our understanding of modern slavery risks and controls. In FY24, we worked closely with a small number of renewables suppliers to build visibility and traceability of our extended supply chains.

- **Maintained our screening of suppliers** - through our Modern Slavery Risk Management Toolkit we applied our MSRA Procedure, SCT Tool, Social Audit Protocol and new Cause and Control Library to build traceability of those within our supply chain, visibility of where they operate and assessment of the maturity of their controls across solar panel, battery, inverter and wind turbine manufacturers.
- **Applied our Social Audit Protocol** - we worked collaboratively with manufacturers of solar panels and battery storage equipment to undertake Sedex Members Ethical Trade Audit (SMETA) 4-pillar audits by members of the Association of Professional Social Compliance Auditors. These audits reviewed responsible business practices against standards set by the Ethical Trading Initiative Base Code, universal rights covering UNGPs, and local laws.
- **Undertook a periodic supplier review** - we assessed 300 suppliers with a higher inherent risk exposure to modern slavery type practices through our third-party SAQ platform and updated monitoring lists with ESG screening, due diligence and business conduct platforms.
- **Monitored and investigated concerns** - in April 2024, our third-party ESG business conduct tool alerted us to a mailing services supplier who was operating in Victoria without a child employment permit. During the period it operated without the required permit the supplier was not distributing Origin material in Victoria. Due to this alert, we communicated with the supplier in a timely manner to understand the circumstances of the breach and the steps they had taken to rectify the non-compliance. We were advised that they had obtained the required permit, ceased engaging children whilst the Victorian permit was sought and operated in a manner otherwise consistent with the child employment requirements. We applied our Human Rights Remediation Guide and consequently assessed the modern slavery risk as low.
- **Implemented Sedex** - we worked with 12 prioritised suppliers of solar panels and battery storage solutions to implement a new ESG risk management platform to manage supply chain risk and facilitate improvements through social audits.
- **Support our identified high-risk suppliers** - we followed through on identified improvement actions and overcome the challenges of obtaining supply chain transparency.
- **Built the capability and capacity of smaller suppliers of renewables** - we engaged with suppliers in a collaborative way to build their capability and capacity to identify and mitigate modern slavery risk exposure. This included tailored face-to-face sessions with assistance from third-party experts.
- **LPG shipping** - we engaged with our shipping counterparty on proposed changes to our due diligence approach.

4 Review the effectiveness of our actions

In FY24, we continued to mature the policies and procedures first developed in FY20, which previously focused on the identification and segmentation of suppliers by risk profile. We collaborated with suppliers, and organisations within the broader resources and energy industry to understand emerging trends and best practices to effectively manage our risks. In particular, we simplified our MSRA and prioritised building relationships, transparency and visibility in the extended supply chains of renewables manufacturers to deep dive on the risk. We regularly review and assess the effectiveness of our policies, codes, standards and procedures as part of our Risk Management Framework.

Developing and executing our assurance plan to test effectiveness

Effective implementation and accountability mechanisms are critical to the success of our modern slavery maturity plan. That's why we set clear goals and monitor progress and compliance of our processes. Working with our finance strategy, procurement risk and compliance teams, we developed an assurance plan to test our preventative, detective and corrective controls.

In FY24, we undertook a number of actions including:

- Refreshed our high-risk country list against Sedex database and the updated Global Slavery Index.
- Reviewed 300 suppliers with a higher inherent risk exposure to modern slavery type practices through our SAQ platform.
- Reviewed our procurement teams' compliance to our MSRA across over 250 sourcing activities.
- Assessed nearly 40,000 purchase orders for goods and services to better understand any connection between our materiality threshold and our exposure to modern slavery practices through lower value and higher volume purchases. We identified just 0.3 per cent of the purchases did not have modern slavery due diligence applied and we considered where we can have positive influence in their supply chain to be appropriate.
- Conducted a knowledge check of 50 participants selected from 350 Origin employees who had completed the MSRA training more than 30 days prior. Results illustrated an 86 per cent retention rate of participants' ability to identify and take appropriate actions to assess and address modern slavery.

Measuring our progress

We continue to monitor progress against the areas identified in our FY23 Modern Slavery Statement as our focus for FY24 and beyond.

	Our commitments in FY23	Our progress in FY24
Building our understanding and capabilities	Continuing to work closely with industry peers and suppliers to build our understanding of modern slavery risks across the breadth of the renewable energy industry.	Continuing to participate in the CEC's Risk of Modern Slavery Working Group, where we continue to support the CEC's Modern Slavery Pledge.
	Continuing to present regularly to the Executive and the Board to ensure the risks of modern slavery for Origin are well understood.	Provided a progress update on the ethical sourcing of renewable energy solutions.
	Continuing to build the capability and competency of all Origin employees to identify, assess and address modern slavery risks in our dealings with counterparties and suppliers.	100 per cent completion of modern slavery awareness training with traders responsible for purchasing physical commodities. Procurement and sourcing employees upskilled through simplified MSRA.
Improving our policies and processes	Reflect the outcomes from our salient human rights assessment in our policies and processes.	Continued to review our Human Rights Policy and broader policies and processes.
	Explore opportunities to strengthen our due diligence approach for both existing and prospective counterparties.	Implemented updates to our Know Your Counterparty procedure and onboarding documentation, to improve transparency of counterparty modern slavery risk management.
	Conduct further modern slavery due diligence for investment decisions and business relationships.	Embedded MSRA into Origin Investment Committee decision making process and in acquisition assessments.
Enhancing engagement with our suppliers	Improve labour rights assessments for site audits for solar installers.	Utilised a preferred provider for installing solar panels.
	Work with priority suppliers to implement the Sedex risk management platform.	Onboarded 12 suppliers across Origin Zero, Generation and Integrated Gas business units.
	Support identified high-risk suppliers to follow through on improvement actions identified and improve supply chain transparency.	Assist our suppliers to remediate 20 instances of non-conformances on the Sedex platform.
	Work with suppliers of renewable energy products to help create supply chains free from components and materials produced in high-risk geographies.	Built traceability and visibility of extended supply chain for solar panels, battery energy storage solutions, wind turbines and inverters.
	Collaborate with CEC and HRREc working groups to build our capability and develop industry approaches to managing modern slavery risks, including common supplier standards and processes where appropriate.	HRREc - Participated in roundtable with NSW Anti-Slavery Commissioner on the code of practice for renewables. CEC - Contributed to NSW Anti-slavery Commissioner Guidance on Reasonable Steps.

Our grievance mechanism

Origin utilises an external confidential grievance mechanism, the Origin ConcernLine.

Origin ConcernLine

In FY24, the Origin ConcernLine received four disclosures; none of which related to whistleblowers or to modern slavery.

Origin's Human Rights Policy sets out our commitment to remedy adverse human rights impacts, where appropriate, in line with the UN Guiding Principles on Business and Human Rights. Our Human Rights Remediation Guide supports this commitment through:

- requiring that all suspected human rights breaches are reported;
- allowing for human rights concerns to be reported through Origin ConcernLine;
- requiring the investigation of reported concerns and action, with consideration for the protection of affected persons;
- providing guidance on appropriate remediation; and
- requiring that prevention of further harm and actions to address root causes are considered.

Our assessments have not identified any confirmed modern slavery practices in our own operations or direct supply chain. As outlined in this Statement there is a high inherent risk of modern slavery type practices in relation to some products manufactured by renewable energy suppliers. Identifying these practices requires vigilance and we will continue to apply our Modern Slavery Risk Management toolkit and work with suppliers to develop deeper supply chain transparency.

Case study: Grid scale batteries and wind turbines



Origin is working to expand its portfolio of renewable energy assets and storage, and to better enable customers to reduce emissions. Origin has a suite of projects in various stages of development, and which cover energy types and locations across Australia.

Origin currently has 1.5 GW of committed owned and tolled battery energy storage systems with further development opportunities being progressed.

To build Origin's capability and pipeline of renewable developments in FY24 and help meet our ambition of 4-5 GW by 2030, Origin made several strategic acquisitions. These included the Warrane property for a potential wind farm development, in addition to the proposed Ruby Hills wind farm, Salisbury solar farm and the Yanco Delta wind farm developments. Yanco Delta is an advanced 1.5GW wind farm and battery project with its Development Approval secured, without local objections.

As one of the nation's largest electricity generators and operator in the National Energy Market for over two decades, Origin recognises the importance of engaging with communities, partnering with stakeholders and supply chains to ensure transparency, build trust and maintain long-lasting relationships. That's why we continue to engage with other key industry members, including manufacturers of renewable energy components, EPCs, and the CEC and HRREc to improve supply chain transparency. This all helps us address modern slavery risk in our renewable energy supply chains. We recognise the projects are significant and will be developed over a number of years.

Wind turbines

During initial tendering, we sought to understand potential suppliers' controls. As part of engaging with our supply chain, Origin's General Manager of Development and Construction attended operational and equipment manufacturers based in China, Europe and the USA. At the same time, we conducted research on the risks with suppliers' policies, procedures and tools, assessing them using our Cause and Control Library to establish their maturity.

Battery energy storage

We shortlisted a number of credible organisations that have the capability to contribute to grid-scale battery energy storage solutions. Our chosen supplier for the Eraring battery energy storage system provides a lithium iron phosphate battery, free from cobalt, and is a supporter of the *Global Battery Alliance's* Battery Passport pilot.¹ We conducted assessments of these battery manufacturers, and engineering, procurement and construction contractors to build visibility of our extended supply chains. We also worked with transmitters to assess balance of plant goods like transformers and assessed the policies and procedures of labour hire organisations, including opportunities to support First Nations businesses.



¹ www.globalbattery.org/battery-passport/

Case study: Working with suppliers of renewable energy to our customers



Our Origin Zero business aims to help accelerate large businesses to net zero through a range of products and services from four key categories: decarbonising grid energy, reducing emissions and energy costs at sites, electrification of assets and offsetting residual carbon emissions. We have previously acknowledged that the transition to renewable energy technologies may pose modern slavery challenges.

“One of the biggest issues for the sector, and therefore the global transition, remains its exposure to the risk of forced labour”¹ as documented by the UN Special Rapporteur on Contemporary Forms of Slavery.

In FY24, we worked with key suppliers across battery storage, wind turbines, solar panels and inverters by:

- connecting on Sedex;
- reviewing historical SMETA 4 pillar audits;
- undertaking new audits, in line with our Social Audit Protocol;
- resolving non-conformances identified through SMETA audits; and
- continuing to work with suppliers to build visibility and traceability of their supply chains.

The audit findings were summarised in SMETA Corrective Action Plan Reports, which highlighted non-conformance, observations and good examples. The audit process provided the opportunity to work with suppliers to identify and assess the risks to modern slavery early.

While 23 non-conformances were identified, none were considered to be modern slavery type practices. Twenty of these are now resolved through follow-up audit activity, confirmed through site tours, worker interviews and provision of evidence in follow-up audits. Following are some examples:

- One solar technology manufacturer based in China worked with their supplier to remedy an administrative discrepancy through the implementation of comprehensive timekeeping systems to ensure working hours are not excessive. They also required clear communication of emergency signage and evacuation routes to ensure working conditions are safe. A follow-up audit was undertaken, which identified one non-critical health and safety related non-conformance around adherence to the use of personal protective equipment.
- Two solar manufacturers based in China had overtime hours that exceeded local standards. These non-conformances remain open and we are continuing to work with the suppliers to resolve them.
- A battery energy storage system manufacturer based in China facilitated remediation of eight historical health and safety-related audit non-conformances outlined in its Corrective Action Plan. The audit also uncovered good practice examples of ISO 14001, ISO 5001, ISO 37001 and SA8000 accreditation.



Our approach to consultation, collaboration and approval



We see power in collaboration and co-ordination. Origin works with organisations that share the same view of modern slavery as a salient human rights issue. We believe its complexity requires a broader industry and community response.

Our key consultation and collaboration activities in FY24 included continuing to engage with:

- Human Rights Resources and Energy Collaborative (HRREc), established in 2019 by practitioners committed to respecting human rights in our respective businesses and addressing modern slavery risks in our operations and supply chains. It is a forum where practitioners can share learnings, and challenges, develop best practice and align industry responses for respecting human rights.
- Clean Energy Council (CEC), the peak body for the clean energy industry in Australia, with more than 1,000 members. The CEC works with Australia's leading renewable energy and energy storage businesses to support them in accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

In FY24, we continued to undertake a multi-stakeholder approach to share knowledge, build capacity, seek feedback and the develop best practices through:

- sharing insights and good practice with large corporations;
- contributing to NSW Anti-slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains;
- participating in the Anti-slavery forum, Fostering Responsible Commercial Conduct, hosted by Office of NSW Anti-slavery Commissioner;
- attending the Procurement Leaders Modern Slavery Round Table and Sedex member forums, and
- engaging with Monash University to improve the quality of our disclosure.

Our process to deliver the actions in this Statement was managed through four key mechanisms:

- **Our Modern Slavery Working Group** – Origin corporate functions provide oversight and support across all controlled entities, including the 12 Reporting Entities within the group (as outlined in Appendix A). Our Modern Slavery Working Group includes representatives with accountability across Origin to enable appropriate consultation between group entities and delivery of activities. Representation is reviewed annually and activities prioritised on the areas more highly exposed to risks of modern slavery practices.
- **Our largest joint venture** – Origin representatives regularly collaborate with representatives from Australia Pacific LNG to build understanding and capability, and enable alignment of the Statements published across joint venture parties. In FY24, we continued our participation in the collaboration forum between the operators of Australia Pacific LNG to enhance our understanding of practices across the joint venture.
- **Our Executive Leadership Team** – the team endorses our Modern Slavery Maturity Plan and monitors delivery and outcomes.
- **Our Safety and Sustainability Committee** – the committee monitors and minimises all related risks arising from our activities and operations.

Our Executive Leadership Team has also been involved in the approval of this Statement. The Statement was approved by the Board on 14 August 2024 and is signed by the Chief Executive Officer.

Looking ahead



Origin respects fundamental human rights. We conduct ourselves and our business with due care and in accordance with relevant laws and regulations. We continue to focus on building our understanding and capabilities, continually improving our policies and processes, and enhancing engagement with our suppliers.

As we pursue our ambition to lead the energy transition through cleaner energy and customer solutions, we are aware that modern slavery is a risk we will need to identify and manage in our operations and supply chains, and we are committed to continue exploring ways we can do that effectively. We believe that collaboration across industry and with key suppliers is vital to developing broader solutions, and we will continue to play a leading role in forums such as CEC and the HRREc.

Our key focus areas for FY25 and beyond are:

- continue to review our Know Your Counterparty process for commodities supply;
 - provide tailored modern slavery awareness training module for all trading team members responsible for purchasing physical commodities;
 - continue to improve supply chain transparency for renewables;
 - continue to review and improve our policies and procedures to maintain good practice; and
 - conduct further modern slavery due diligence for investment decisions, business relationships and strategy execution.
- assess evolving electric vehicles and hydrogen activities to identify potential modern slavery risk will be completed at the appropriate time;
 - continue to work with prioritised suppliers to implement the Sedex risk management platform to further enhance our screening, including completing social audits;
 - implement improvements to due diligence processes in LPG shipping;
 - continue to build capability of our suppliers by collaborating to identify and remediate modern slavery risks; and
 - refresh our Supplier Code to reflect any updates to our Human Rights Policy to ensure our suppliers meet our expectations.



Appendix A: Reporting entities covered by this statement

This joint Modern Slavery Statement covers the activities, operations and extended supply chains of Origin Energy Limited ABN 30 000 051 696 and all of our controlled entities for the period 1 July 2023 to 30 June 2024 (FY24). Refer to our Annual Report and Sustainability Report for further details including our list of controlled entities.

Reporting entities classified under the definition of the Commonwealth Modern Slavery Act 2018 listed below. Relevant Reporting Entities with Consolidated revenue >\$100m:

Entity	Registration
Origin Energy Limited	ABN 30 000 051 696
Origin Energy Holdings Pty Ltd	ABN 30 004 132 423
Origin Energy LPG Ltd	ABN 77 000 508 369
Origin Energy Retail Ltd	ABN 22 078 868 425
Origin Energy (Vic) Pty Ltd	ABN 11 086 013 283
Origin Energy Electricity Ltd	ABN 33 071 052 287
WINconnect Pty Ltd	ABN 71 112 175 710
Origin Energy LNG Portfolio Pty Ltd	ABN 88 610 626 750
OE JV Co Pty Ltd	ABN 38 095 483 195
Origin Energy Power Ltd	ABN 93 008 289 398
Origin Energy Eraring Pty Ltd	ABN 31 357 688 069
Sun Retail Pty Ltd	ABN 97 078 848 549

Appendix B: Addressing the mandatory reporting criteria

Australian Modern Slavery Act mandatory reporting criterion	Reference in this statement
Identify the reporting entity	Important information, About Origin, Reporting Entities Covered by this Statement (see page 2), (see page 4), (see page 21)
Describe the reporting entity's structure, operations and supply chains	Our structure and operations, Our supply chain (see page 5) - (see page 7)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Assess modern slavery risk factors for our operations and supply chain, Prioritise focus areas within our operations and supply chain for further due diligence (see page 9), (see page 10)
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address risks, including due diligence and remediation processes	Take action to address the risks of modern slavery practices, Our approach to consultation, collaboration and approval, Case Studies (see page 13), (see page 19), (see page 17), (see page 18)
Describe how the reporting entity assesses the effectiveness of such actions	Review the effectiveness of our actions (see page 15)
Describe the process of consultation with any entities the reporting entity owns or controls; and, for a reporting entity covered by a joint statement, the entity giving the statement	Our approach to consultation, collaboration and approval (see page 19)
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Reporting entities covered by this statement (see page 21)

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Where all good change starts

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