

# Modern Slavery Statement 2024

## Acknowledgement of Country

AGL recognises the First Nations people as the Traditional Custodians of the lands on which we work, and acknowledges those communities' continuing connections to their lands, waters and cultures. We pay our respects to their Elders, past and present.

Hallett Wind Farm, SA.

## About this Statement

This Modern Slavery Statement (**Statement**) is made pursuant to s16(1) of the Modern Slavery Act 2018 (Cth) (**Act**) and sets out the risks of modern slavery in AGL Energy Limited's (**AGL**) operations and supply chains, the actions taken to assess and address those risks during the financial year, and how we assess the effectiveness of those actions.

The Statement covers the financial year ending 30 June 2024 (**FY24**). It is submitted as a joint statement and applies to AGL, the AGL entities considered reporting entities under the Act (which are listed in Appendix A), and the owned and controlled subsidiaries of AGL (**AGL Subsidiaries**). A full list of AGL Subsidiaries is included in our FY24 Annual Report. The Statement also covers all brands which are part of the AGL Group, including:

- AGL
- Southern Phone Company
- Perth Energy
- Connect Now
- OVO Energy
- Energy360
- Sol Distribution

References to 'AGL', 'we', or 'our' throughout this Statement includes all AGL Entities and Subsidiaries covered by this Statement, unless otherwise specified.

## Board approval

This Statement was approved by the Board of Directors of AGL, which is the holding company of the AGL Group of Companies on 10 December 2024.



**Patricia McKenzie**  
Chair

## Forward Looking Statements

*The Statement contains a number of forward-looking statements in relation to AGL and the AGL Subsidiaries. This includes statements regarding AGL's intent, beliefs, goals, objectives, opinions, initiatives, commitments, or current expectations with respect to AGL's business and operations, and risk management practices in so far as they relate to our management of modern slavery risk.*

*Any forward-looking statements are based on the current expectations, best estimates and assumptions of AGL's management as at the date this Statement was approved by the AGL Board, but they may be affected by a range of factors which could cause actual results to differ materially including but not limited to financial, market, risk, regulatory and other relevant environments that will exist and affect AGL's business and operations in the future. These forward-looking statements are not guarantees or predictions of future performance, and are subject to known and unknown risks, uncertainties and may involve significant elements of subjective judgement and assumptions as to future events that may or may not be correct and be beyond AGL's control.*

*Except as required by applicable regulations or by law, AGL does not undertake any obligation to publicly update or review any forward-looking statements, whether because of new information or future events. Forward-looking statements speak only as of the date of this Statement. Past performance cannot be relied on as a guide to future performance. No representation or warranty, express or implied, is given as to the accuracy, completeness or correctness, likelihood of achievement or reasonableness of any forward-looking information contained in this Statement. AGL cautions against reliance on any forward-looking statements.*





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# CEO Message



I am pleased to present AGL's Modern Slavery Statement for FY24. At AGL, our purpose and company values drive our behaviours and our expectations of our people. As the largest private operator of electricity generation within the National Electricity Market, providing around 4.5 million<sup>1</sup> customer services, we recognise the important role we play in respecting and upholding human rights, and specifically in working towards the eradication of modern slavery.

## Continuous Improvement

Throughout FY24, we have continued to focus on further enhancing our ability to identify, assess and manage the risks of modern slavery within our operations and supply chains. This year, we have:

- expanded our social audits of high risk suppliers to gain a greater understanding of risks present within our supply chains, and to work collaboratively with our partners to mitigate these risks;
- further enhanced our understanding of high risk supply chains, including through a continued focus on increasing our understanding of risks across the extended supply chain within our solar panel installation related business; and
- built on ongoing training and awareness campaigns relating to the risks of modern slavery, through a series of internal and supplier training sessions and events, which in FY24 also included the involvement of a modern slavery survivor and human rights advocate.

To date, our assessments and broader actions have not identified any confirmed instances of modern slavery in our operations or supply chains. However, we acknowledge that in a complex and globally connected business, not all such instances may be readily identifiable.

I am proud of AGL's role as a leader in the transition to a lower emission, affordable and smart energy future through our strategy to connect our customers to a sustainable future and transition our energy portfolio.

As we continue to play a leading role in driving Australia's decarbonisation journey, our modern slavery-related risks will continue to evolve and increase in complexity; in turn, we are committed to continuing to invest in appropriate responses.

While we are pleased with the progress we have made in FY24, large numbers of people continue to live in modern slavery conditions both in Australia and across the globe. The eradication of modern slavery is a complex task that requires companies, communities, and governments to work together on collective solutions, and we are committed to doing our part both through AGL's operations and supply chains, and in collaboration with stakeholder groups including the Australian Government.

### Damien Nicks

Managing Director & CEO

## 1. Key Risks

AGL operates a complex business which includes operations across Australia and dealings with global supply chains that support our Australian operations. Summarised below are the modern slavery risks in our operations and supply chains that were identified, assessed, and managed during the FY24 reporting period.<sup>2</sup>



### Offshore Labour

AGL engages offshore labour for activities including labour hire, data processing and call centre support in geographies with comparatively higher inherent modern slavery risk.



### Cleaning, maintenance and security services

AGL procures these services across a wide variety of our corporate and operational sites. These categories of work have been assessed as relatively high risk due to factors including remote work locations, manual labour, on demand work and diminished visibility over subcontracting arrangements.



### Sourcing of electronic goods (e.g. laptops, modems, and mobiles)

AGL sources a wide range of electronic goods for use within our operations. Electronic goods are considered high risk for modern slavery due to associated sourcing and manufacturing processes.

1. Services to customers includes energy, telecommunications, and Netflix services. Number is as of 30 June 2024.

2. AGL's material modern-slavery related risks remained consistent in FY24 with those identified and reported in our FY23 Modern Slavery Statement.



### Acquisitions, investments and joint ventures

AGL regularly enters into acquisitions, investments and joint ventures where they align to our strategic objectives. Depending on their nature, these can impact on our broader modern slavery risk.



### Construction

AGL works with third-parties to construct grid scale renewable and firming generation to support the transition of AGL's energy portfolio. Construction can be associated with modern slavery risk due to the nature of renewable construction projects, including the raw materials used and the propensity for construction projects to leverage complex operations and supply chains.



### Carbon offsets

AGL purchases carbon offsets to offer carbon neutral products to our customers. Where these are purchased outside Australia, they may present a relatively higher modern slavery risk due to variations in governance requirements in some geographies.



### Solar supply chain

AGL installs solar panels for residential and business customers. The solar panel supply chain, including the procurement, transport and installation of solar panels, is considered a high risk industry for modern slavery.



### Power purchasing of renewable certificates

Power purchasing agreements used to source electricity for our customers typically involve renewable assets which can be associated with modern slavery risk, including forced labour practices and the sourcing of required materials that are higher risk for modern slavery.



### Engagement of labour via third-parties (including subcontracting)

AGL engages third-party recruitment firms to provide contingent labour in areas including administrative support and operational site maintenance support. AGL has comparatively less visibility over labour practices employed through these contracting arrangements.



### Sourcing of batteries

AGL sources batteries for a wide variety of uses, including for grid scale large energy storage infrastructure and for electronic equipment used throughout AGL. Batteries are considered high risk for modern slavery due to associated sourcing and manufacturing processes.



Risks in our operations








Risks in our supply chains

+ Further detail on our risk identification process and the risks themselves can be found in Section 6.2.

## 2. Summary of Key Actions

Throughout FY24, AGL continued to develop, embed and enhance a wide range of initiatives which have further improved our approach to identifying, assessing and addressing the risks of modern slavery within our operations and supply chains. Consistent with prior years, a survivor first approach remains fundamental to our overall modern slavery risk management. The key initiatives delivered in FY24 include:

 <b>Modern Slavery Speaker Event</b>	 <b>Modern Slavery Toolbox Talk</b>	 <b>Supplier Briefing Session</b>	 <b>Solar supply chain deep dive</b>	 <b>Expansion of social audit program</b>
<p>AGL hosted a modern slavery survivor and human rights advocate to speak to the business about his lived experience as a modern slave in Australia's agricultural industry, and his work as an advocate for survivors.</p>	<p>A modern slavery 'toolbox talk' was developed for our on site personnel which provides greater awareness of modern slavery to our operational staff, including how AGL manages the risk through our policies, processes and procedures.</p>	<p>AGL held its inaugural supplier training session attended by suppliers of our renewable energy products to discuss the importance of modern slavery risk management and our expectations for the proactive management of modern slavery risk in their operations and supply chains.</p>	<p>Recognising that the solar supply chain represents one of our most material modern slavery risk areas, and building on analysis conducted in FY23, AGL completed a deep-dive into our solar supply chain.</p>	<p>We expanded our existing social audit program, which involves a structured and on the ground assessment of key and high risk suppliers to gain greater insight into how they are managing their relevant modern slavery risks. In FY24, suppliers involved in the production of solar modules, batteries, inverters, solar related componentry and logistics continued to be a focus for social audits.</p>
<p>+ Read more on page 7</p>	<p>+ Read more on page 25</p>	<p>+ Read more on page 30</p>	<p>+ Read more on page 31</p>	<p>+ Read more on page 33</p>



Actions in our operations

Actions in our supply chains





# 3. From Survivor to Advocate

A journey of resilience: Moe Turaga, modern slavery survivor and human rights advocate shares his powerful story with AGL.

AGL had the privilege of hosting modern slavery survivor and human rights advocate, Moe Turaga, who spoke about his lived experience as a modern slave in Australia's agricultural industry and his work to advance the rights of modern slavery survivors. By sharing his story, he gave a voice to the 41,000 people who are estimated to be experiencing modern slavery in Australia<sup>1</sup>.

Moe's story is a powerful reminder for our people to live our values, fulfil our commitments set out in our Human Rights Policy and to follow our modern slavery risk management practices – such that those who work in our operations and supply chains do so freely, willingly and with dignity. Attendees were inspired by Moe's strength and resilience, with many reaching out to AGL's modern slavery subject matter experts (**SMEs**) to discuss proactive steps they can take to contribute to ending modern slavery in their everyday lives.

At the conclusion of Moe's presentation, AGL also announced a donation to the Sisters of Charity Foundation's Raise the Roof program. The program assists survivors of modern slavery and human trafficking to find a safe place to live.

"AGL's engagement with Mr Turaga is an important example of business leadership. Hearing directly from a modern slavery survivor creates a powerful moment of self-reflection about human rights within a business. It can catalyse and transform how everyone involved can contribute and be more accountable to ethical practices." Jenny Stanger, Executive Manager and Program Manager, Australian Catholic Anti-Slavery Network.



**Photo:** Moe Turaga, modern slavery survivor and human rights advocate.

"I share my story about the realities of modern slavery in Australia to help businesses see the human impact. My story isn't just about what happened to me – it's about what can be done to prevent it from happening to others. When businesses listen and take action, they have the power to make change in their organisation, their industry and the larger community." Moe Turaga, modern slavery survivor and human rights advocate.



**Photo:** From left to right: Moe Turaga, modern slavery survivor and human rights advocate, Damien Schulze, AGL's Group Compliance and Privacy Officer.

1. Global Slavery Index 2023

# 4. About AGL

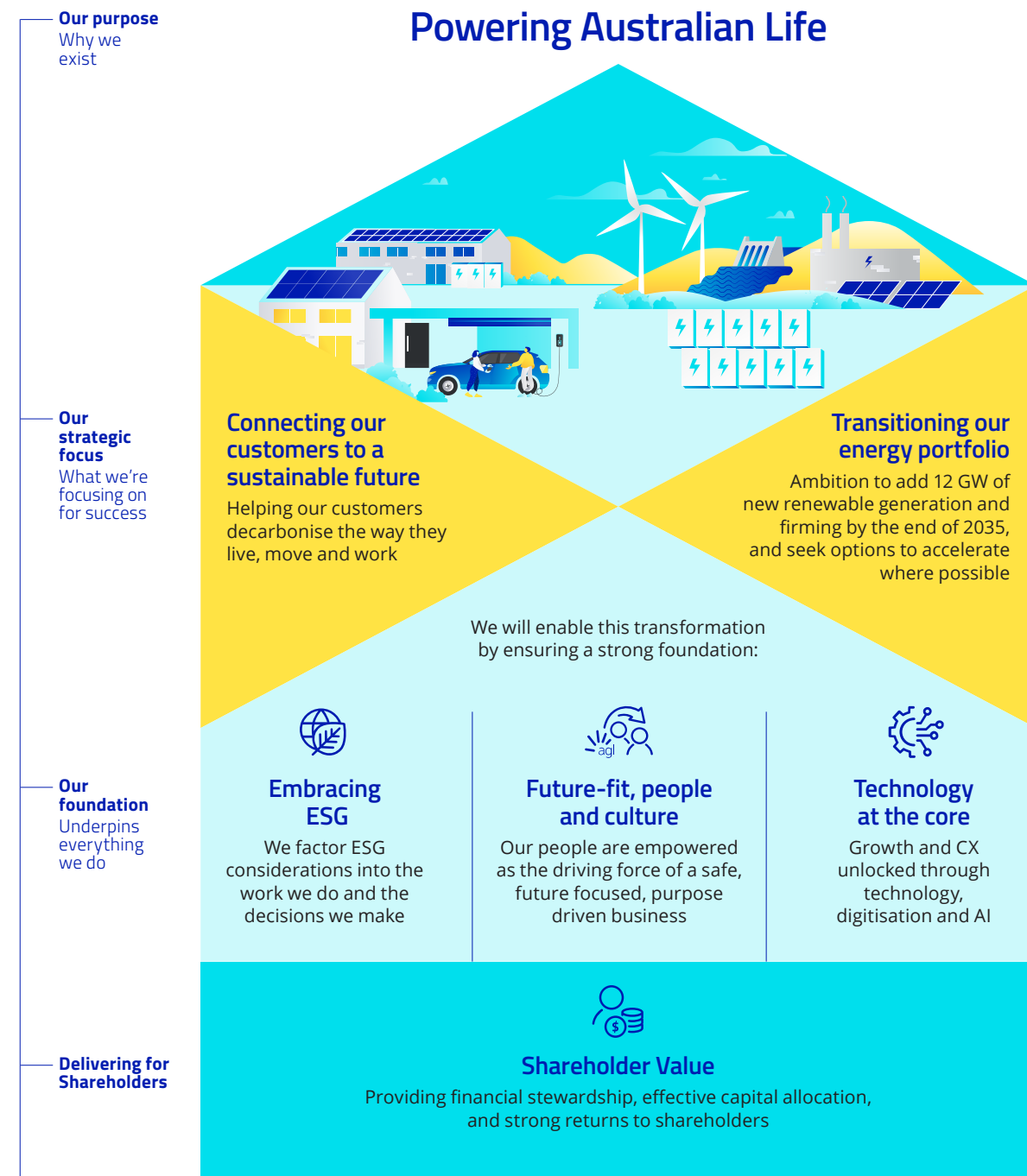
## 4.1 Who We Are

Proudly Australian for more than 185 years, AGL is an Australian company (ABN: 74 115 061 375), registered in New South Wales. AGL supplies energy and other essential services to residential, small, and large businesses and wholesale customers. AGL is committed to providing our customers simple, fair, and accessible essential services as they decarbonise and electrify the way they live, work and move.

AGL operates the largest electricity generation portfolio within the National Electricity Market of any ASX-listed company. Our portfolio comprises coal and gas fired generation, renewable energy sources such as wind, hydro and solar, batteries and other firming technology, and storage assets. We are building on our history as one of Australia's leading private investors in the construction of renewable energy projects and owner of the largest privately owned fleet of hydro assets in Australia, to now be a leader in the business of transition to a lower emission, affordable and smart energy future in line with the goals in our Climate Transition Action Plan (**CTAP**).

By focusing on our strategy to connect customers to a sustainable future and to transition our energy portfolio, we will continue to innovate in energy and other essential services to enhance the way Australians live, and to help preserve the world around us for future generations.

The diagram below provides an overview of our strategic focus and the foundational elements that underpin it.





## 4.2 Our Purpose and Values

AGL's purpose, **Powering Australian Life**, and company values, (**Bring on tomorrow; Can do. Will do;** and **Be safe. Be supportive**) reflect our commitment to provide reliable, sustainable, and affordable energy solutions for millions of homes and businesses as we play our role in Australia's energy transition. At an enterprise level, AGL's purpose provides our company, our directors and our employees and contractors with the foundations for actions and, together with our values, guides our thinking and decision-making so that we continue to perform and deliver for our customers, communities, and other stakeholders.

Our purpose and values are foundational to our approach to modern slavery risk management. AGL respects and upholds human rights within our operations and supply chains for the benefit of our people, the people we work with, our customers and the communities in which we operate and that are affected by our operations.

Our Purpose is centred on

# Powering Australian Life

At AGL, we believe energy  
makes life better.  
That's why we're passionate about  
powering the way Australians live,  
move and work.



### Bring on tomorrow.

Seize the opportunity. The work we do today impacts the Australia we leave for future generations. We don't have all the answers. But through continuous improvement and working together, we'll uncover opportunities that make history. For all of us. Bring it on.



### Can do. Will do.

Make things happen. We show up with a positive attitude. We're resilient, confident, and flexible in the way we work. Combine this with our expertise and insight, we always deliver. For ourselves, each other, and our customers.



### Be safe. Be supportive.

Be a good human. Upholding a safe environment at work is on all of us. So we back ourselves and we back each other. Creating a culture where everyone feels included, heard and safe, every day.

# 5. Our Structure, Operations and Supply Chain

## 5.1 Our Structure and Operating Segments

The principal activities of AGL throughout the FY24 reporting period remained consistent with the FY23 Statement, and comprised the operation of energy businesses and investments, including electricity generation and storage, gas storage, the sale of electricity and gas to residential, business and wholesale customers, and the retailing of broadband and mobile services.

### 5.1.1 Principal Activities

AGL manages its business in three key operating segments: Customer Markets, Integrated Energy and Investments which are summarised below:

- **Customer Markets** – comprises the Consumer and Large Business customer portfolios responsible for the retailing of electricity, gas, broadband/mobile/voice, solar and energy efficiency products, and services to residential, small and large business customers. Customer Markets sources its energy from Integrated Energy at transfer prices that reflect wholesale energy costs in each state, along with energy provided by rooftop solar. Customer Markets also includes sales, marketing, brand, AGL's customer contact and call centre operations, and AGL's electrification and innovation growth areas.
- **Integrated Energy** – operates AGL's power generation portfolio and other key assets, including coal, gas, wind and hydro generation facilities, grid-scale batteries, natural gas storage and production facilities, and development projects. Integrated Energy runs a large trading operation that manages price risk associated with procuring electricity and gas for AGL's customers, manages AGL's obligations in relation to renewable energy schemes, and controls the dispatch of AGL's owned and contracted generation assets, gas offtake agreements and associated portfolio of energy hedging products.
- **Investments** – comprises AGL interests in ActewAGL Retail Partnership, Tilt Renewables, OVO Energy Australia<sup>1</sup> and other investments.

The map on page 11 shows the energy assets which we operate or have an interest in as of 30 June 2024.

### 5.1.2 Subsidiaries and Acquisitions

As of 30 June 2024, AGL has two fully owned subsidiaries which do not fully operate within AGL's standard management processes, Energy 360 Pty Ltd (Energy360) and OVO Energy Pty Ltd (OVO).

Whilst both Energy360 and OVO maintain some processes outside of AGL's standard processes, AGL continues to maintain management oversight and control over both subsidiaries. The structure, operations, and supply chains of Energy360 and OVO are contained in [Appendix B](#).

1. AGL has 100% ownership since 3 April 2024.

4.5 million

total services to customers

4,356

number of employees (headcount)

4,197

number of employees (FTE)

40%

employees covered by Enterprise Agreement



Traditional Custodians of the lands on which we work are identified on the map in our Reconciliation Action Plan, available on our [website](#).

#### Legend

<span style="color: yellow;">●</span> Operated by AGL	<span style="color: blue;">⚡</span> Gas-fired	<span style="color: green;">☀️</span> Solar	<span style="color: blue;">💧</span> Gas production/import	<span style="color: blue;">ⓧ</span> Decommissioned
<span style="color: blue;">○</span> Under construction/commissioning	<span style="color: red;">⚡</span> Coal-fired	<span style="color: blue;">💧</span> Hydro	<span style="color: blue;">🗑️</span> Gas storage	
<span style="color: green;">●</span> Contracted use or interest	<span style="color: blue;">🌬️</span> Wind	<span style="color: blue;">🔋</span> Grid-scale battery	<span style="color: blue;">🏠</span> Mine	

<sup>Δ</sup> Assets owned by Tilt Renewables.

\* Projects funded / owned by other parties. Sunraysia Solar Plant 50% contracted generation to AGL.

Map reflects assets as at 14 August 2024. Generation assets operated or contracted by AGL which have an installed capacity of less than 50 MW are not shown on this map.

## 5. Our Structure, Operations and Supply Chain

### 5.2 Our Supply Chain

AGL has a large and diverse supply chain consisting of approximately 4,167 direct suppliers that enable us to supply goods and services to our customers and deliver on our strategic objectives. Over the course of FY24, AGL's procurement spend totalled approximately \$2.05 billion. Key categories of spend included operations and facilities construction, repair and maintenance (approximately 26%), IT and telecommunication services (approximately 17%), engineering services (approximately 7%), and contingent labour and professional services (approximately 6%).

In addition to AGL's procurement spend, we also source energy-related products for our customers and operations, which we refer to as our 'wholesale markets' supply chain. In FY24, AGL's spend on electricity, gas and other fuel, renewable certificates, and other contractual relationships with third parties to manage pricing risks totalled approximately \$1.5 billion.

#### 5.2.1 Wholesale Markets

In FY24, AGL's wholesale markets supply chain included the following key types of supply arrangements:

- electricity supplied to our Customer Markets business area predominantly purchased from the Australian Energy Market Operator (**AEMO**), which is a legislated body that manages the electricity and gas systems and markets across Australia. Various power generation companies, both domestic and foreign owned, supply the electricity procured by AEMO.
- gas and other fuel for generation, including coal, purchased from upstream producers or other wholesalers, with additional contracting of required transportation and transmission services to deliver to AGL's sites or customers.
- investments for the development of new renewable generation, which involve entering into long-term contracts, known as Power Purchase Agreements (**PPA**), for the offtake of electricity and renewable certificates from these projects.
- renewable certificates purchased from producers through standalone contracts or PPAs.
- certified carbon offsets, also known as carbon credits, purchased from projects that reduce, remove or capture emissions from the atmosphere. AGL procures these offsets to support AGL's Carbon Neutral program that is offered to our customers.

AGL also maintains contractual relationships with counterparties to manage price risk.

#### 5.2.2 AGL's International Procurement Spend

AGL recognises that the location of its suppliers plays a major role in driving the inherent risk of modern slavery in our supply chain. Approximately 9.9% of AGL's FY24 procurement spend was associated with international suppliers.

The map on pages 12-13 sets out the countries of AGL's international spend<sup>1</sup>, the number of direct suppliers<sup>2</sup>, the number of material suppliers and includes the geographic risk level for each country, which AGL uses as part of its sourcing due diligence process. Further detail on AGL's sourcing due diligence process is documented in [Section 6.3.2](#) of this Statement.

1. The supplier location in the map is predominantly based on billing address. We recognise that the supplier billing address will not always provide an accurate indication of the geographic risks relevant to a supplier, and as a result AGL will continue to analyse the locations our material and high-risk suppliers operate within, and therefore the geographic risks these present, across future reporting periods.

2. Direct Suppliers are AGL's Tier 1 suppliers with whom AGL has direct contracts.

4,000+  
suppliers

\$2.05B  
procurement  
spend

Canada



9



1.03%

IT services, IT  
software, Operation  
and maintenance

Ireland



5



1.50%

Marketing,  
IT software

UK



19



10.48%

Engineering  
professional services,  
IT software

USA



77



7.93%

Financial services,  
IT services,  
IT software,  
IT hardware,  
Financial services,  
Consumables,  
Professional  
services, Solar  
resale

France



1



0.0013%

Operation and  
maintenance

Switzerland



4



0.88%

IT software



**40.4%**  
of spend to  
material suppliers\*

**31**  
material suppliers\*

**22**  
total countries  
of supply

**90%**  
of spend made to  
Australian registered  
businesses



**Legend**

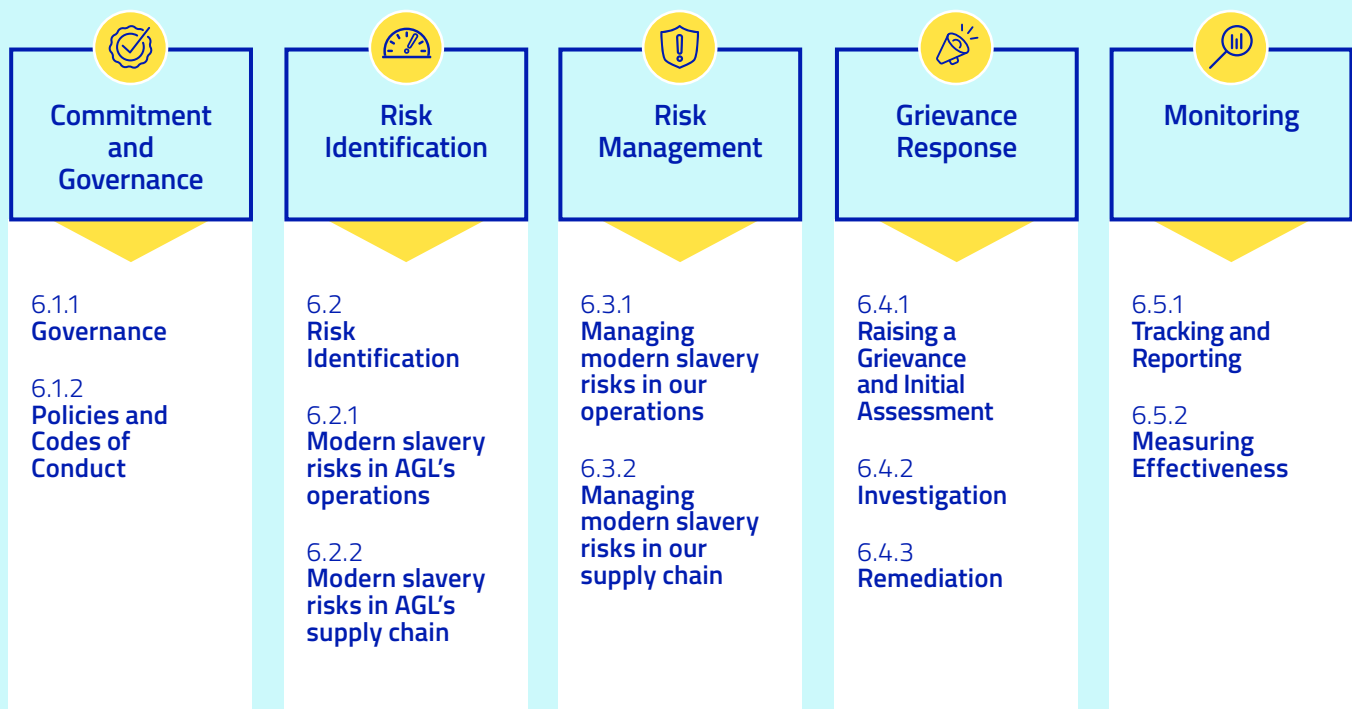
● Highest Risk    
 ● High Risk    
 ● Moderate to Low Risk    
 🧑 Number of Suppliers    
 🌐 % of International Spend

\* Material Suppliers are AGL's Tier 1 suppliers who are assessed as posing a very high or extreme inherent risk to AGL according to AGL's Fully Integrated Risk Management (FIRM) matrix. For example, they may provide strategically important products or services to AGL.

# 6. Managing Modern Slavery Risks

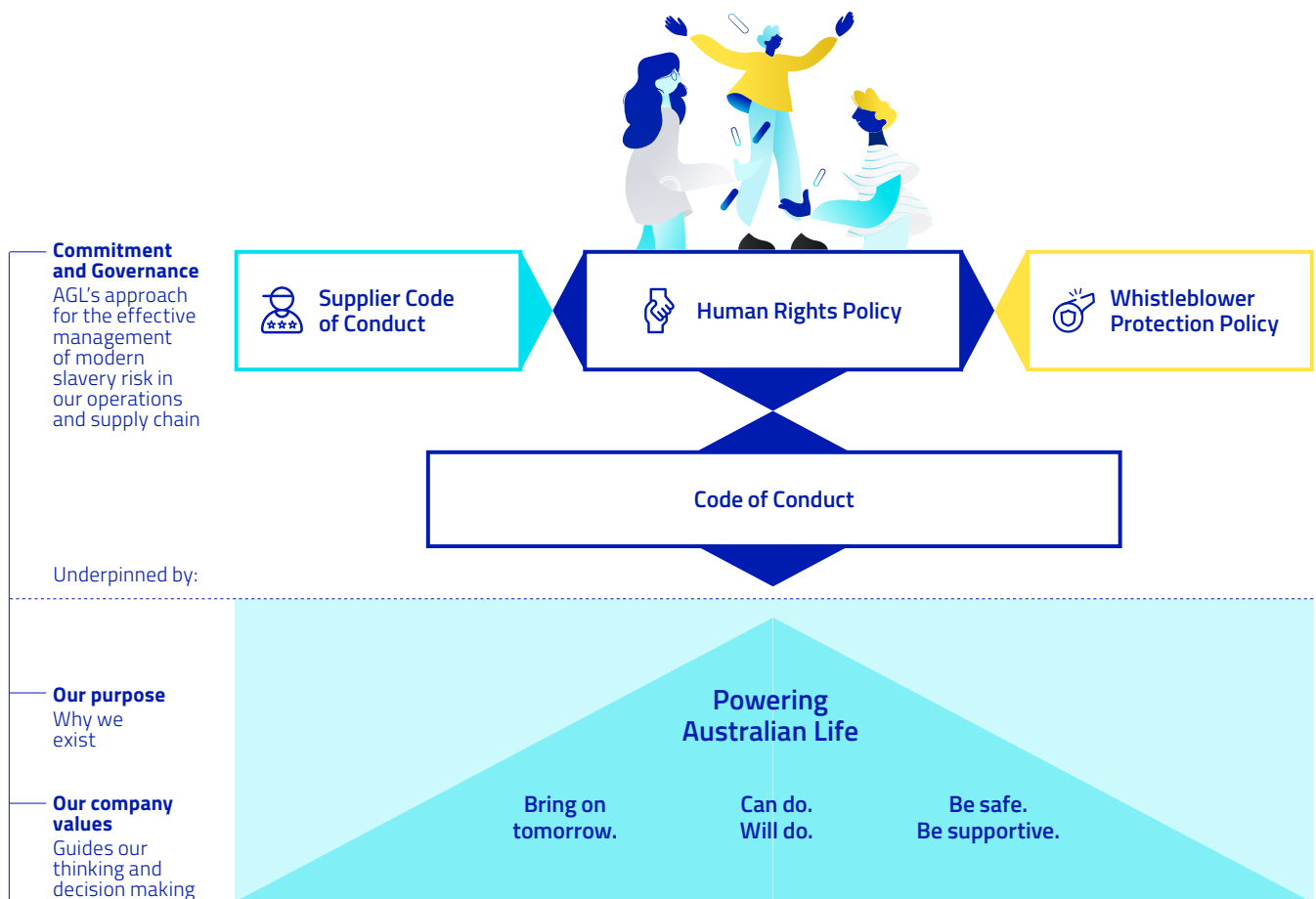
AGL's Modern Slavery Framework (**Framework**) describes the approach we take to manage our modern slavery risks and supports the development of prioritised improvements to the management of the risk in a coordinated and focused manner. As detailed in our FY23 Statement, the Framework is comprised of 5 elements and 12 sub-elements referenced in the diagram below. No changes were made to the Framework throughout FY24.

## AGL's Modern Slavery Framework





## 6.1 Commitment and Governance



The Commitment and Governance element sets out AGL's approach to setting an appropriate tone from the top for the effective management of modern slavery risk in our operations and supply chain.

The element, underpinned by our purpose and values described in [Section 4.2](#), is supported by the following policies:

- Code of Conduct;
- Human Rights Policy;
- Supplier Code of Conduct; and
- Whistleblower Protection Policy.

These policies prescribe a clear set of commitments, requirements and expectations that shape our thinking and behaviour relating to the management of human rights-related risks at AGL.

Complementing these policies, the Framework itself affirms AGL's commitment to the effective management of modern slavery risk and describes in more detail the specific governance activities undertaken and roles and responsibilities that have been defined relating to modern slavery risk management. The Framework has been developed considering the following key principles:

- **A consistent approach to modern slavery risk management:** effective governance ensures the organisation adopts a structured and consistent approach to identifying, managing and addressing modern slavery risks across the organisation.
- **Continuous improvement:** senior leaders across the organisation are committed to the continuous improvement of AGL's modern slavery risk management.
- **Meeting stakeholder expectations:** modern slavery risk management must be responsive and proactive to meet the evolving demands of our stakeholders (including investors, customers, shareholders and the broader community).

## 6. Managing Modern Slavery Risks

### 6.1.1 Governance

AGL has defined clear roles, responsibilities, and accountabilities for the management of modern slavery-related risks. Consistent with the FY23 reporting period, the following roles, responsibilities and accountabilities enabled the organisation to maintain proactive management of this risk.

AGL Board		
The AGL Board is ultimately responsible for the governance of AGL. The Board and relevant Board Committees receive regular updates on the progress made in relation to AGL's modern slavery risk management and related initiatives. The Board's governance role includes the approval of policies relevant to the management of modern slavery and responsibility for approving AGL's Modern Slavery Statement on an annual basis.		
Group Audit		
AGL's Internal Audit function (Group Audit) provides independent and objective assurance to AGL on the effectiveness of governance, risk management and internal controls, and periodically provides assurance over the management of AGL's modern slavery risks.		
Executive Team (ET)		Enterprise Leadership Team (ELT) (Direct reports to the ET)
Each member of AGL's ET is accountable for ensuring that their respective business area (and the business as a whole) has a sound system of risk management and internal control that aligns to AGL's Risk Management Policy. This includes risks relating to modern slavery, and the implementation of AGL's policies relating to modern slavery risk. Two members of AGL's ET (AGL's Chief Financial Officer and General Counsel & Company Secretary) are executive sponsors of AGL's modern slavery program.	The ELT are responsible for implementing modern slavery risk management practices and mitigations that are appropriate for the risks identified within their respective business area and that are aligned to AGL's Risk Management Policy and Risk Appetite. The ELT are further responsible for ensuring effective risk management practices are maintained within their area of responsibility.	
Group Risk Compliance and Insurance (GRCI)		
GRCI and its Modern Slavery SMEs have carriage of the AGL enterprise-wide risk management function and are responsible for supporting the business to manage risks and compliance obligations, including those associated with human rights and modern slavery. GRCI is responsible for AGL's Human Rights Policy, Modern Slavery Framework, administering AGL's Modern Slavery Working Group and overseeing AGL's modern slavery work program.		
Procurement	Business Unit	Modern Slavery Working Group (Working Group)
AGL's Procurement team is responsible for the design and effective implementation of AGL's Procurement Policy and processes associated with the identification of modern slavery risks in AGL's supply chain.	Business Unit teams are responsible for the day-to-day management of human rights and modern slavery risks associated with their business unit in accordance with AGL's risk management processes. In accordance with these processes, each Business Unit is responsible for identifying, assessing and monitoring modern slavery risks and their treatment via the implementation of appropriate processes and controls.	The Working Group is a cross-functional group of senior business stakeholders responsible for driving the implementation of AGL's agreed modern slavery risk management initiatives to adequately manage and continuously improve our modern slavery risk profile. Membership, roles and responsibilities and the modern slavery work plan are reviewed annually or more frequently as required.

Further detail on AGL's broader governance framework and risk management practices can be found in AGL's [Corporate Governance Statement 2024](#).





### 6.1.2 Policies and Codes of Conduct

Ethical behaviour is central to how we do business at AGL – it is central to our purpose and values and supported and upheld in our policies and Code of Conduct.

Throughout FY24, AGL continued to affirm our commitment to ethical behaviour and the prevention and eradication of modern slavery in our operations and supply chain through well-defined and established policies approved by AGL's Board. AGL's key policies remained consistent with those policies referenced in our FY23 Statement, and included the following:

Policies	Actions taken to Operationalise
<b>Code of Conduct</b>	
<p>Affirms AGL's commitment to playing an active role in combatting modern slavery in our operations and supply chains, and to continuously review and improve AGL's approach to addressing the risks of modern slavery.</p> <p>Requires the following from AGL people:</p> <ul style="list-style-type: none"> <li>• Act in a way that upholds and respects human rights – including taking steps to address modern slavery in our operations and supply chains.</li> <li>• Speak up if you suspect modern slavery or a breach of human rights in relation to AGL's operations and supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>• The Code of Conduct is included as part of AGL's Annual Compliance Training program, which is completed by all employees and key contractors as part of induction upon commencement of employment/engagement and on an annual basis.</li> <li>• Throughout FY24, AGL's Ethics Panel, which comprises our Chief People Officer, General Counsel &amp; Company Secretary and General Manager Group Audit, continued to oversee the administration of the Code of Conduct. The Ethics Panel is responsible for reviewing any concerns or alleged breaches (such as those which may indicate a potential instance of modern slavery) to identify any common causes, systemic issues or themes that require further investigation or action by management.</li> <li>• The Code is required to be reviewed at least every two years and is due to be reviewed again in June 2025.</li> </ul>
<b>Human Rights Policy</b>	
<ul style="list-style-type: none"> <li>• Sets out AGL's commitment to respect the dignity and human rights of AGL's employees, customers, suppliers and the communities in which we operate or who are affected by our operations.</li> <li>• Affirms AGL's commitment to operate in a manner consistent with the laws and jurisdictions in which our business operates, including those relating to human rights and modern slavery, and to operate to the highest standards of integrity, fairness, and ethical conduct.</li> <li>• This policy is guided and informed by internationally and domestically recognised human rights standards.</li> </ul>	<ul style="list-style-type: none"> <li>• This policy was updated and approved by the AGL Board in December 2022. It is reviewed every two years and will be reviewed in the first half of FY25.</li> <li>• This policy is included in AGL's Annual Compliance Training program.</li> </ul>
<b>Supplier Code of Conduct</b>	
<ul style="list-style-type: none"> <li>• Sets out the minimum Environmental, Social and Governance (ESG) standards of behaviour required from AGL suppliers, and explicitly defines AGL's expectations and requirements as they relate to human rights, labour practices and modern slavery.</li> <li>• AGL's Supplier Code of Conduct has been developed in alignment with the United Nations Global Compact principles and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.</li> </ul>	<ul style="list-style-type: none"> <li>• All AGL precedent contracts with suppliers require the supplier to read, understand and be compliant with AGL's Supplier Code of Conduct.</li> <li>• AGL precedent contracts also provide AGL with the right to issue a supplier with a questionnaire to assess the supplier's performance compared to the requirements set out in the Supplier Code of Conduct.</li> <li>• The Supplier Code of Conduct was updated in February 2024.</li> <li>• In instances where supplier contracts are used, AGL negotiates the provisions of the modern slavery clause with the supplier to ensure modern slavery risk is appropriately managed by the supplier.</li> </ul>

## 6. Managing Modern Slavery Risks

Policies	Actions taken to Operationalise
<b>Whistleblower Protection Policy</b> <ul style="list-style-type: none"> <li>Encourages people (both AGL and non-AGL) to raise potential misconduct, which is broadly defined and includes conduct associated with modern slavery or human rights violations (in addition to other categories of misconduct).</li> <li>Sets out the various ways concerns or grievances can be raised at AGL, and confirms that reports may be made via phone, email or letter and can be made anonymously and inside or outside of business hours.</li> <li>Confirms that “Your Call” (a service available 24 hours a day, 7 days a week) has been engaged by AGL to provide external, third-party whistleblower services.</li> <li>Specifies that the Board will receive, at least quarterly, a summary of disclosures made under this policy, which includes the number and type of issues raised, how matters are being investigated (if applicable), whether those disclosures have been substantiated and the outcome. Disclosers are not identified as part of this reporting.</li> </ul>	<ul style="list-style-type: none"> <li>The Ethics Panel continues to oversee the administration of this policy and reviews any reported concerns or alleged breaches to identify any common causes, issues or themes that require further investigation or action by management.</li> <li>This policy is included in the training material included in AGL’s Annual Compliance Training program.</li> <li>The policy is required to be reviewed at least every two years and is due to be reviewed again in June 2025.</li> <li>Initiatives to promote our Safe to Speak Up program during FY24 included:               <ul style="list-style-type: none"> <li>An article posted to our intranet site outlining what happens when a person makes a report under this policy.</li> <li>Printed posters for display at our sites were prepared for the purposes of promoting this policy to site personnel.</li> <li>The below image was published to digital screens across our corporate offices.</li> </ul> </li> </ul> <div>  <div> <p>Speak up with AGL’s Whistleblower Protection Policy</p> <p>Let’s create a <b>safe and supportive</b> workplace together</p> <p>🔍 Search AGL Safe to Speak Up on The Source</p>  </div> </div>



## 6.2 Risk Identification

In FY24, we continued to take steps aligned to our Risk Management Policy and standard risk practices to identify and assess the risks of modern slavery inherent in AGL's operations and supply chain.

As in previous periods, our risk identification process has been informed by modern slavery risk indicators. Drawn from a number of sources, including publications such as the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (May 2023) and advice from external human rights consultancies, AGL considers relevant risk indicators as part of the identification of material modern slavery risks across our business operations and supply chain. During FY24, management considered AGL's operations and supply chain to determine whether any new or changed modern slavery risk indicators should be used as part of the risk identification process. The risk indicators identified as part of the FY23 Statement (summarised below) remain the most relevant indicators for AGL.



### Vulnerable populations

Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of worker vulnerability, and risk of poor labour practices and exploitation are recognised to be higher in contexts where base skill labour is relied upon.



### High risk business models

Business models that rely on third parties for the provision of services – often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.



### High risk sectors or categories

Products and services regarded as having more significant inherent modern slavery risks including industries that rely heavily on low-skilled labour and/or involve menial and repetitive work, often performed at night-time or in remote locations.



### High risk geographies

Countries or regions which are known to have higher human rights (and modern slavery) risks. High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance.

Informed by the above key risk indicators, and consistent with the approach taken in FY23, AGL undertook the following key activities to review its modern slavery risk profile for FY24:

Activity	Overview
<b>Modern slavery risk assessment</b>	AGL's modern slavery SMEs collaborated with business unit risk teams to reassess the modern slavery risks across each business unit's value chain. In FY24, this process included the engagement of a third-party consultant to undertake a deep-dive into AGL's solar supply chain.
<b>Material changes to structure, operations and supply chain</b>	Material changes to AGL's structure, operations, and supply chains since the FY23 Statement were considered to determine if any change occurring throughout FY24 had an impact on our modern slavery risks. This analysis considered changes in product service offerings, internal restructures, changes to processes, and investments/acquisitions made throughout the year.
<b>Analysis of AGL's supply chain</b>	AGL engaged an independent third-party consultant to conduct data analytics to understand more fully the modern slavery risks inherent within our supply chain. Further details on this assessment can be found below.
<b>Review of external environment</b>	AGL's Modern Slavery SMEs reviewed the external environment for updates to modern slavery risk areas. This review included engagement with external stakeholders.
<b>Modern Slavery Working Group</b>	Input, support and feedback on the risks identified was sought from AGL's Modern Slavery Working Group.

### Data analytics – assessment of AGL's supply chain data

To further our understanding of the modern slavery risks inherent within our supply chain, AGL engaged an independent third-party consultant to conduct an inherent modern slavery risk assessment of direct suppliers used throughout the course of FY24.

The **objectives** of this assessment were to:

1. confirm the completeness of AGL's modern slavery risk profile by analysing our direct supply chain; and
2. obtain an increased understanding of the salient modern slavery risks which exist in our supply chain.

## 6. Managing Modern Slavery Risks

### Assessment methodology

The data analytics assessment involved the following key steps:

1. Spend data associated with direct suppliers for the period 1 July 2023 through to 31 March 2024 was extracted and analysed.
2. Extracted spend data was classified into its relevant geographic location<sup>1</sup> and industry classification codes<sup>2</sup>.
3. A proprietary supplier assessment methodology was applied to the spend data to assess the inherent modern slavery risk of each supplier. This assessment considered the supplier's industry, in addition to identified geographic and industry controversy risks across three modern slavery risk factors: forced labour, child labour and human trafficking. Each element (industry, geographic location, and industry controversy) was assigned a weighting to determine a cumulative risk score for each supplier (ranging from low to high risk).

### Overview and key insights into our modern slavery risk profile

The assessment of individual suppliers across 147 industries resulted in the following key findings:

- As was the case in FY23, most procurement spend (more than 92%) is attributable to suppliers with an inherent modern slavery risk of medium or lower.
- AGL's highest inherent risk of modern slavery within our supply chain remains with suppliers associated with the solar panel manufacturing industry. The data analysis identified that AGL suppliers within this industry operate across eight different countries, although those with the highest forced labour risk include China and the Philippines. The analysis also identified that suppliers within this sector have a very high inherent risk average across forced labour and human trafficking, with a low to medium inherent risk for child labour.
- A review of the outcomes of this assessment confirms that our risk profile captures the salient modern slavery risks that are material to our operations and supply chain.

#### Leveraging the United Nations Guiding Principles (UNGPs) to identify and manage our modern slavery risk exposure

AGL considers the UNGPs on Business and Human Rights to better understand the potential for our involvement in an adverse human rights impact, including modern slavery, and to determine appropriate next steps based on the level of any involvement that we may have. In accordance with the commitments set out in our Human Rights Policy and based on the principles set out in the UNGPs, we have a responsibility to:

1. avoid **causing or contributing** to adverse human rights impacts through our own activities, and address such impacts when they occur; and
2. seek to prevent or mitigate adverse human rights impacts that are **directly linked** to our operations, products, or services via our business relationships, even if we have not contributed to those impacts.

As was the case in FY23, AGL's risk assessment process confirms that it is more likely that AGL is directly linked to modern slavery (rather than causing or contributing to modern slavery practices through our operations and supply chain). The potential for direct linkage to modern slavery risks and practices is summarised in the tables in Sections [6.2.1](#) and [6.2.2](#).

#### CAUSE

A business may cause an adverse human rights impact if its actions directly result in modern slavery. For example, modern slavery is caused by a company when the company uses child labour to perform hazardous tasks.

#### CONTRIBUTE

A business may contribute to an adverse human rights impact if its actions are conducive to modern slavery (but do not directly cause the modern slavery). For example, requiring the manufacturing of goods in an unreasonable timeframe may result in worker exploitation, as a subcontractor may be pressured to exploit workers to meet these requirements.

#### DIRECTLY LINKED








A business may be directly linked to modern slavery through its business relationships, such as a supplier, even if it did not cause or contribute to the harm. For example, a company may purchase goods or services from a supplier that causes or contributes to modern slavery conditions.

1. In recognition of the overrepresentation of Australian suppliers within the procurement data set based on billing addresses, the independent consultant reviewed the suppliers' publicly available information and documents to manually adjust supplier country of origin for some high risk suppliers.  
2. Industry classification codes are the Global Industry Classification (GICS) and the Australian and New Zealand Standard Industrial Classification.



### 6.2.1 Modern Slavery Risks in AGL's Operations









Based on the risk identification process described above, AGL has identified the following material inherent modern slavery risks within our operations across FY24. The risk categories identified in FY24 remain consistent with those reported within our FY23 Statement, and the key mitigations implemented to address these risks are set out in [Section 6.3](#).

Operations	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis
<b>Offshore Labour</b>		
<p>AGL engages offshore labour through third-parties in geographies which are inherently more likely to face modern slavery risks (including labour hire services, data processing and call centre personnel).</p> <p>This includes AGL's outsourced technology support and call centre personnel who are located in India, South Africa and the Philippines, countries which are considered at higher geographic risk of modern slavery by third-party experts. Accordingly, workers may be at a relatively greater risk of being subject to forced labour or child labour. In addition, AGL has comparatively less visibility over practices employed through these arrangements outside Australia.</p>	 	<p><b>Directly Linked:</b> Illustrative risk scenario: unethical recruitment practices associated with offshore labour in AGL's call centres in India, South Africa or the Philippines may result in call centre personnel being charged recruitment fees and/or subject to debt bondage by their employer, exposing AGL's supplier's employees to modern slavery practices.</p> <p><b>Contribute:</b> Illustrative risk scenario: AGL pricing or purchasing practices may place pressure on suppliers to exploit their workers (e.g. requiring excessive overtime), resulting in AGL contributing to modern slavery practices.</p>
<b>Engagement of (onshore) labour via third parties (including subcontracting)</b>		
<p>AGL utilises third-party recruitment firms to engage on-shore contingent labour (e.g. to provide fixed-term administrative assistance). AGL also engages with third parties for the provision of labour services (such as maintenance and cleaning at our operational sites, or the installation of solar panels), who may subcontract aspects of the service delivery to other organisations, all of which may involve the use of migrant workers and involve low barriers to entry for labour hire providers. In these cases, AGL has comparatively less visibility over practices employed through these contracting arrangements. For example, workers may be engaged to work in remote areas, which significantly increases the complexity of required oversight by AGL as well as by regulators, unions, and third-party labour providers due to the remoteness of a site.</p>	 	<p><b>Directly Linked:</b> Illustrative risk scenario: AGL engages third-party suppliers to install solar panels in metro as well as remote regional areas, who may use and exploit migrant workers and thereby subject these workers to conditions of forced labour.</p> <p><b>Contribute:</b> Illustrative risk scenario: AGL pricing or engagement practices may place pressure on suppliers to exploit their workers (e.g. requiring excessive overtime), resulting in AGL contributing to modern slavery practices.</p>
<b>Acquisitions, Investments and Joint Ventures</b>		
<p>Depending on the sector, acquisitions, investments in, or partnerships with other organisations can expose AGL to high risk business models, vulnerable populations, or high-risk geographies.</p> <p>As we transition our energy portfolio, AGL has an ambition to add 12 GW of new renewable and firming generation to our portfolio by 2035 and will seek options to accelerate where possible. As part of the delivery of these ambitions, we expect to continue to actively consider acquisitions, investments and joint venture activity over time.</p>	  	<p><b>Directly Linked:</b> Illustrative risk scenario: AGL invests in a joint venture arrangement for the development of renewable energy. The venture has immature procurement practices which result in materials and products being sourced from manufacturers who are engaging in modern slavery practices.</p> <p><b>Contribute:</b> Illustrative risk scenario: the purchasing practices of the joint venture encourage or place undue pressure on suppliers to exploit their workers (e.g. through excessive overtime), resulting in modern slavery practices.</p>

## 6. Managing Modern Slavery Risks

### 6.2.2 Modern Slavery Risks in AGL's Supply Chain

AGL has also identified the following material inherent modern slavery risks within our supply chains across FY24. The risk categories identified in FY24 remain consistent with those reported within our FY23 Statement, and the key mitigations implemented to address these risks are set out in [Section 6.3](#).

Supply Chain	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis
<b>Solar Supply Chain</b>		
<p>AGL's procurement of solar-related products for the purposes of transitioning our energy portfolio or for supply and installation to our residential or commercial and industrial customers is considered high-risk for modern slavery due to risks present throughout the supply chain. Specifically, the manufacturing of solar panels and components and the polysilicon used in some solar products have been associated with the exploitation of Uyghur and Kazakh minorities in Xinjiang, China.</p> <p>Transportation services relied on for the procurement of solar-related products also present a high risk of modern slavery practices, which are most prevalent in the maritime industry due to constrained costs, a fragmented system of regulatory oversight and limitations on the effective enforcement of conditions onboard vessels.</p> <p>In addition, solar installations have been assessed to be an area of modern slavery risk in the construction sector due to the common practice of utilising migrant workers, complex and informal subcontracting, labour hire involving multiple sub-contracting arrangements, and low barriers to entry for labour hire providers. Where installations consist of large-scale solar installations in remote areas, the site's remoteness may significantly increase the complexity of required oversight by AGL as well as by regulators and unions. As a result, there are unique risks associated with these installations, which may heighten the risks associated with modern slavery.</p>	   	<p><b>Directly Linked:</b> Illustrative risk scenario: AGL sources solar modules or components that include components manufactured or transported using forced and/or child labour.</p> <p><b>Contribute:</b> Illustrative risk scenario: AGL's purchasing practices associated with the procurement of solar-related products place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in AGL's supply chain.</p>
<b>Sourcing of Batteries</b>		
<p>AGL sources batteries for a wide variety of uses, including for grid scale large energy storage infrastructure, home batteries for retail customers, and for electronic equipment used throughout AGL (such as in laptop computers).</p> <p>The procurement of batteries is considered high risk for modern slavery due to risks present throughout the supply chain. Both the sourcing of raw materials as well as battery manufacturing processes have high exposure to modern slavery risk.</p> <p>Specifically, key materials used in the manufacturing of batteries (including lithium and cobalt) may be sourced from regions associated with human rights abuses. It is estimated that between 15% and 30% of the cobalt used in lithium batteries is sourced from artisanal mines in the Democratic Republic of the Congo – where forced and child labour is common<sup>1</sup>.</p>	  	<p><b>Directly Linked:</b> Illustrative risk scenario: AGL sources lithium batteries which are identified to include components or materials manufactured or sourced from the use of forced and/or child labour.</p> <p><b>Contribute:</b> Illustrative risk scenario: AGL's purchasing practices associated with the procurement of batteries place undue pressure on suppliers to exploit their workers (e.g. due to pricing or other contract terms), resulting in modern slavery practices in AGL's supply chain.</p>
<b>Sourcing of Electronic Goods (e.g. laptops, modems, and mobiles)</b>		
<p>The electronics manufacturing industry is considered a high risk sector for modern slavery due to the low profit margins and tiered production systems typically associated with the industry. Manufacturing often takes place in less developed countries with relatively fewer legal and regulatory protections, hence there may be less oversight over labour rights. In addition, modern slavery risks are present within the supply chains of these products, particularly in the sourcing of raw materials from high risk geographies.</p>	  	<p><b>Directly Linked:</b> Illustrative risk scenario: AGL sources electronic goods such as modems and laptops for use in its corporate offices which include components or materials manufactured or sourced from the use of forced and/or child labour.</p> <p><b>Contribute:</b> Illustrative risk scenario: AGL's purchasing practices associated with the procurement of electronic goods place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in AGL's supply chain.</p>

1. Cockayne, Huerta and Burcu, 'The Energy of Freedom? Solar energy, modern slavery, and the Just Transition' pg. 5, 2022.

**Cleaning, Maintenance and Security Services**

AGL employs the services of cleaning, maintenance and security contractors for a range of services across our corporate and operational sites.

These categories of work have been assessed as relatively high risk due to factors including remote work locations, manual labour, on demand work and diminished visibility over subcontracting arrangements.

**Directly Linked:**

Illustrative risk scenario: AGL engages third parties for the provision of cleaning services across its sites. The third parties engage migrant workers on temporary visas who may be subject to recruitment fees, debt bondage and/or conditions associated with forced labour.

**Contribute:**

Illustrative risk scenario: AGL's purchasing practices associated with the procurement of cleaning, maintenance, and security services place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in AGL's supply chain.

**Power Purchasing of Renewable Certificates**

AGL enters into long term PPAs, committing to the purchase of energy supply from power generators. PPAs typically require AGL to support the development of renewable assets, which are considered higher risk for modern slavery due to forced labour practices associated with the sourcing of materials required for utility-scale renewable assets.

**Directly Linked:**

Illustrative risk scenario: AGL agrees to purchase electricity from a utility-scale solar farm that has immature procurement practices, who source solar panels manufactured with the use of forced labour.

**Construction**

AGL works with third parties to construct grid scale renewable generation, storage and firming assets to support the transition of AGL's energy portfolio.

As we transition our energy portfolio, AGL has an ambition to add 12 GW of new renewable and firming generation to our portfolio by 2035 and will seek options to accelerate where possible. As part of the delivery of these ambitions, we expect that construction activity will increase over time.

**Directly Linked:**

Illustrative risk scenario: AGL engages a principal contractor for the development of a grid-scale battery in regional Australia. The principal contractor engages sub-contractors to support the project who subject their employees to poor working conditions akin to forced labour or associated with debt bondage.

**Contribute:**

Illustrative risk scenario: AGL's commercial agreement with the principal contractor for the development of a grid-scale battery places undue pressure on the principal contractor to exploit their workers, resulting in modern slavery practices in AGL's supply chain.

**Carbon Offsets**

AGL purchases carbon offsets to offer carbon neutral products to our customers. The carbon offsets are sourced both domestically and internationally. Offsets from some international markets are perceived to have higher risk in relation to modern slavery compared to offsets sourced from within Australia. This is due to the relatively stricter laws and oversight in Australia compared to some overseas jurisdictions that have less governance over the activities engaged in to create the carbon offsets, and due to the variability of carbon standards in projects associated with carbon offsets.

**Directly Linked:**

Illustrative risk scenario: AGL purchases carbon offsets on the international market that are associated with overseas sustainability projects. Such projects subject vulnerable populations to the conditions of forced labour.

## 6. Managing Modern Slavery Risks



### 6.3 Risk Management

AGL is committed to ensuring that effective risk management practices are embedded into all business processes and operations to drive consistent, effective, and accountable actions in our business and decision-making processes. A strong risk management culture is critical to the success of AGL's strategic, operational, and commercial objectives. AGL maintains an enterprise-wide risk management framework, underpinned by our Risk Management Policy, which is aligned with the principles and requirements of the international standard for risk management (ISO 31000 – Risk Management). This culture and practise of risk management is reflected in our modern slavery risk management approach, resulting in the following initiatives and activities implemented throughout FY24 to manage modern slavery risk in our operations and supply chain. Further information on our risk management approach can be found in our [Corporate Governance Statement 2024](#).

#### 6.3.1 Managing Modern Slavery in our Operations

As noted in [Section 6.2.1](#), most of the risks identified in AGL's operations relate to the management of labour, including the risks of forced labour and child labour. The key initiatives undertaken to manage modern slavery risks in our operations are detailed below.

#### Training & Awareness

To embed an effective modern slavery risk management culture across our business, our people must have an awareness of our modern slavery risk profile and must be trained in the processes that have been developed and implemented to manage the risk. Throughout FY24 the following key events, training sessions and educational programs were delivered to build on the capability and skills that our people have for the effective management of the risk in their respective business units.

Description of Initiatives	Audience	Key Highlights
<b>Modern Slavery Training</b>		
AGL's Modern Slavery SMEs provided targeted training to AGL teams that requested training, or who were identified as requiring training, to ensure modern slavery risks in their business area were being appropriately identified, assessed, and managed.	Various sessions were held across the business which included participants from: <ul style="list-style-type: none"><li>• AGL's Electrification and Innovation team responsible for developing new AGL products and services.</li><li>• AGL's Strategic Procurement team, responsible for coordinating major procurement activities.</li><li>• AGL's Corporate Affairs team, responsible for broader ESG management and engaging with and managing stakeholder expectations.</li><li>• AGL's People and Culture team, responsible for building AGL's capability and developing the culture to support delivery of AGL's strategy.</li><li>• Numerous Project Procurement teams, who are responsible for co-ordinating sourcing activities for onsite projects.</li><li>• AGL's Customer Markets risk and compliance team, responsible for managing the risk and compliance management processes of our Customer Markets Business Area.</li><li>• AGL's Corporate Development team, responsible for securing future growth opportunities through acquisitions.</li><li>• AGL's Social Licence Council, which governs AGL's social licence program. The Council identifies risks and opportunities to AGL's social licence and makes recommendations as to how they should be addressed.</li></ul>	Training sessions were tailored for each team and where necessary addressed specific modern slavery-related risks relevant to the business area receiving the training. In addition to explaining AGL's modern slavery risk management practices, training sessions also canvassed modern slavery red flags and steps for their management.



Description of Initiatives	Audience	Key Highlights
<b>Toolbox Talk</b>		
A modern slavery toolbox talk and related posters were developed to provide site personnel with greater awareness of modern slavery risk and the processes and procedures that AGL employs to manage the risk.	More than 320 personnel engaged with the toolbox talk session across key operational sites.	Senior leadership at site engaged in the toolbox talk session embodying AGL's commitment to set the tone from the top when engaging in modern slavery risk management.
<b>Modern Slavery and Identifying Competition and Consumer Law Training</b>		
<p>Bespoke training was designed to address situations that may give rise to competition and consumer law risks when undertaking initiatives relating to modern slavery risk management.</p> <p>As a by-product of the training, AGL's 'Modern Slavery Compliance – guidelines for managing Competition and Consumer Law risks' were reviewed and updated.</p>	<p>The training was provided to key stakeholders involved with the management of modern slavery risk.</p> <p>More than 60 participants attended the training session.</p>	Feedback indicated that personnel found the session to be informative and instructive, providing greater confidence for participants engaging in modern slavery risk discussions with third-parties whilst managing AGL's obligations under the Competition and Consumer Act 2010 (Cth).
<b>AGL's Annual Compliance Training</b>		
AGL's Annual Compliance Training is designed to support the maintenance of AGL's proactive compliance culture. It supports AGL personnel to live our values by clearly outlining what is expected of all employees, including ensuring our behaviours are lawful, trustworthy, honest, inclusive, and respectful.	<p>All AGL personnel are required to complete AGL's Annual Compliance Training.</p> <p>In FY24, 3,571 personnel completed the training with an enterprise-wide completion rate of 98%.</p>	<p>From a modern slavery perspective, the training referenced key policies and expectations required of AGL personnel, including the following:</p> <ol style="list-style-type: none"> <li>1. <b>Code of Conduct</b> and the expectations of employees to act in a way that upholds and respects human rights.</li> <li>2. <b>Human Rights Policy</b> and AGL's commitment to respect and uphold human rights.</li> <li>3. <b>Whistleblower Protection Policy</b>, including how potential misconduct concerns can be raised by AGL personnel.</li> </ol>

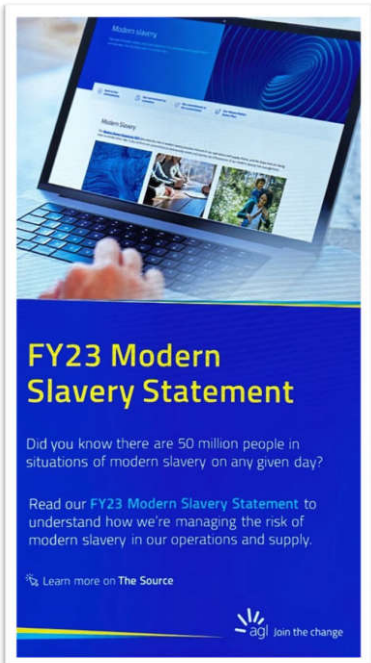
All formal training sessions with AGL personnel are recorded and uploaded to our Modern Slavery intranet site, ensuring that they are accessible and available for personnel to re-engage with at a later date. From time to time, and where necessary, AGL's modern slavery SMEs will circulate the recordings to business leaders with a request that they share the training with new team members as a means of inducting those team members into AGL's modern slavery risk management processes and practices.

## 6. Managing Modern Slavery Risks

### Communication & Awareness Campaigns

Complementing this formal training, across the FY24 reporting period, multiple communication and awareness campaigns were promoted and engaged in across the business to raise awareness of modern slavery and where information can be found on AGL's intranet site regarding the processes employed to manage the risk across our operations and supply chain. The table below describes the key communication and awareness initiatives across FY24.

Description of Initiative	Audience	Key Highlights
<b>International Day for the Abolition of Slavery</b>		
Affirming our support for the International Day for the Abolition of Slavery.	As was the case in FY23, AGL rolled out a communication campaign targeted to all AGL personnel and to our external stakeholders on LinkedIn.	We delivered the following engagement activities to affirm our support for the day: <ol style="list-style-type: none"><li>1. A message on digital screens across AGL's offices confirming AGL's support for the International Day for the Abolition of Slavery.</li><li>2. An intranet article outlining the role AGL has to play in the eradication of modern slavery.</li><li>3. A post on AGL's internal communication platform encouraging AGL personnel to read the article on our intranet site that explains what AGL is doing to eradicate modern slavery.</li><li>4. A LinkedIn post declaring AGL's support for the International Day for the Abolition of Slavery and how we remain committed to upholding human rights in all we do.</li></ol>
<b>Monash University's Modern Slavery Statement Disclosure Quality Report</b>		
Promoting our commitment to manage the risk of modern slavery in our operations and supply chain.	Promoting to our external audience the important work we are engaging in to manage modern slavery risk across our operations and supply chain and sharing the recognition received for work undertaken to manage the risk.	We believe that effective and transparent disclosure provides both significant value for our stakeholders, and supports the progressive improvement of modern slavery risk management across Australian businesses.  It is pleasing to have our efforts recognised in the Modern Slavery Statement Disclosure Quality report authored by Monash University in December 2023.

Description of Initiative	Audience	Key Highlights
<b>AGL's FY23 Modern Slavery Statement</b>		
Promoting the release of AGL's Statement.	<p>Consistent with our approach in FY23, this campaign was targeted to all AGL personnel, but also shared externally by AGL on LinkedIn.</p> <p>Below is the campaign message that was displayed across AGL's corporate sites to socialise AGL's FY23 Statement.</p> 	<p>As was the case for the FY22 Statement, AGL engaged in the following activities to promote our FY23 Statement:</p> <ol style="list-style-type: none"> <li>1. An article on AGL's intranet site communicating the release of the Statement.</li> <li>2. Messages on digital screens to promote the Statement.</li> <li>3. A message to AGL's ELT, informing them of AGL's updated Modern Slavery Statement.</li> <li>4. A post on AGL's internal social media platform by AGL's General Counsel &amp; Company Secretary promoting the Statement.</li> <li>5. A LinkedIn post by AGL (reposted by AGL executives) raising awareness of the released Statement.</li> </ol>

#### In conversation with Moe Turaga – modern slavery survivor and human rights advocate

As detailed on page 7, AGL hosted Moe Turaga, modern slavery survivor and human rights advocate to share his experience in Australia's agricultural industry and the work he does to advance the rights of modern slavery survivors.	<p>The event was a hybrid event held in person at AGL's Melbourne office with interstate and site personnel joining the session online.</p> <p>Approximately 230 AGL personnel attended the event.</p>	This event put a face to an issue that many within the wider community incorrectly perceive to exist beyond our shores. It reiterated the criticality of AGL's proactive steps to address the risk.
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#### Collaboration and Stakeholder Engagement

AGL recognises that the eradication of modern slavery is a complex undertaking that requires a collaborative response from governments, businesses, and the international community. AGL continued to work collaboratively in FY24 with broader stakeholder groups including:

Purpose of stakeholder engagement	Outcomes to address modern slavery
<b>Clean Energy Council's Risk of Modern Slavery Working Group (RMS Working Group)</b>	
<p>The RMS Working Group provides Clean Energy Council members with a forum to:</p> <ul style="list-style-type: none"> <li>• share actions and experiences in meeting the reporting requirements under the Act; and</li> <li>• discuss and collaborate on efforts to manage modern slavery risks within their supply chains.</li> </ul>	<p>During the reporting period AGL's Modern Slavery SMEs were participants in a special sub-group of the RMS Working Group to lead industry contributions to the development of a draft NSW Anti-slavery Code of Practice for the Renewables Value Chain. The Code is being developed in partnership between the Clean Energy Council and The Anti-Slavery Commissioner for New South Wales.</p>

## 6. Managing Modern Slavery Risks

### Purpose of stakeholder engagement

### Outcomes to address modern slavery

#### UN Global Compact Network Australia (UNGCA) – Modern Slavery Community of Practice (MSCoP)

The MSCoP is an interactive forum which meets quarterly, providing a forum for members to discuss the challenges and opportunities facing Australian businesses with respect to the identification, management, and communication of modern slavery risks.	As a member of the UNGCA, AGL gains further insight into the risks associated with modern slavery and the proactive steps that can be taken to manage those risks. Our engagement with UNGCA allows AGL to learn about how other members are managing their modern slavery risks, and share our initiatives with the broader group. These inputs are also shared with the Modern Slavery Working Group.
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#### Australian Council of Superannuation Investors (ACSI)

ACSI provides a voice on financially material ESG issues. ACSI members include Australian and international asset owners and institutional investors with more than \$1.9 trillion in funds under management.	In April 2024 AGL's Group Compliance and Privacy Officer was a panellist at the inaugural 2024 Modern Slavery Seminar – Unmasking Modern Slavery Practices presented by ACSI and Pillar Two. The seminar addressed the manifestations of modern slavery, its impacts and considered steps that investors and companies can take to address modern slavery. The panel discussion involving AGL considered the evolving expectations of stakeholders relating to modern slavery risk management disclosure.
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### Third-party recruitment

AGL operates in accordance with the labour laws of Australia. We protect labour rights by acknowledging our moral and legal obligation to ensure that all workers are treated fairly, both in our own organisation and within the organisations we do business with.

AGL has clear policies and standards that govern the recruitment of permanent employees through its internal recruitment function, with contingent labour sourced and paid by a contracted third-party recruitment firm via a third-party service agreement. AGL periodically reviews the third-party recruitment firm's modern slavery practices, and has confirmed that the firm has appropriate modern slavery processes and practices in place to manage its modern slavery risk. A further review of the firm's management practices is planned to be undertaken in FY25.

### Acquisition, investments and partnerships

Acquisitions, investments in or partnerships with other organisations can expose AGL to high-risk business models, vulnerable populations, high-risk geographies or new modern slavery risks that require new or changed responses. As part of our transaction due diligence processes, AGL formally assesses modern slavery risks associated with each potential transaction. In most cases, this assessment will include the review of a standard modern slavery-related questionnaire by AGL's Modern Slavery SMEs, in order to understand the risks, how these risks interact with AGL's existing risks and risk management plans, and to identify any immediate and longer-term actions that may be required where the transaction is successfully completed. Where an acquisition, investment or partnership is successfully completed, the transaction owner will develop, in consultation with AGL's Modern Slavery SMEs, appropriate risk management plans to address unique risks associated with the transaction.

#### 6.3.2 Managing Modern Slavery in our Supply Chain

As detailed in our FY23 Statement, AGL employs a risk-based approach to the engagement of its suppliers and has embedded a modern slavery risk assessment process into our sourcing processes. In previous years, our modern slavery risk management required a Sourcing Risk Checklist to be completed before the commencement of any sourcing activity. During FY24, changes were made to our Procurement Policy with the aim of focusing our detailed assessment work on suppliers with a higher inherent risk of modern slavery. A Sourcing Risk Checklist must now be completed in the following circumstances that support the risk-based approach taken for the management of modern slavery:

- The supplier is new to AGL.
- The sourcing activity is over \$300,000.
- The purchase involves any of the following categories:
  - Renewable energy products;
  - Electronic devices; and/or
- Purchasing any item or service which is likely to originate from a high-risk geography.

The diagram on page 29 summarises AGL's procurement Modern Slavery Risk Assessment Process. The risk-based process is used to determine if a third-party supplier has satisfactory modern slavery management practices in place. If the processes are deemed to be satisfactory, the supplier will be engaged for the provision of their goods and/or services. This approach operated throughout the FY24 reporting period.

## AGL's Modern Slavery Risk Assessment Process

### Step 1:

#### Sourcing Risk Checklist (SRC)

A SRC is required to be completed at the commencement of the sourcing activity where defined risk-based criteria are met. The SRC determines an inherent modern slavery risk rating for the procurement activity (before any potential suppliers are identified). Where the risk is assessed as elevated, the business must complete steps 2 to 5.

**If Modern Slavery Risk  
is Elevated**

### Step 2:

#### Modern Slavery Questionnaire (MSQ)

After receiving supplier quotations, responses to requests for tender etc., the business contract owner arranges for the shortlisted prospective supplier(s) to complete AGL's MSQ, which assesses the residual modern slavery risk for the supplier(s) (after consideration of the key controls and management strategies the supplier(s) has in place to address its modern slavery risk). It includes a series of questions that inform AGL how the supplier(s) identifies, assesses and manages its modern slavery risks.

### Step 3:

#### Reputational Background Check

A reputational background check on the supplier(s) is completed using a third-party platform that provides publicly available information on ESG claims or issues that relate to the supplier(s). Answers to the MSQ are compared to relevant findings in the reputational background check as part of the Modern Slavery Assessment.

### Step 4:

#### Modern Slavery Evaluation

AGL's Modern Slavery SME reviews the completed MSQ and reputational background check report(s).

On completion, the Modern Slavery SME provides the business contract owner with the outcome of the evaluation(s). These outcomes may include corrective actions that must be completed prior to or during the supplier's engagement or a recommendation not to onboard the supplier.

**On successful selection  
of a supplier**

### Step 5:

#### Negotiate Using Precedent Contracts and Contract Management

On the successful selection of a supplier, contract negotiations commence and, in most cases, the AGL precedent contract will be used for the procurement activity. The precedent contract references AGL's Supplier Code of Conduct and requires suppliers to familiarise themselves with the Code. The standard clause provides AGL with the right to issue the supplier with a questionnaire seeking information about the supplier's approach to business and performance of the contract compared to the Supplier Code of Conduct.

#### Non-compliance with AGL Supplier Code of Conduct

Should AGL identify any non-compliance with the AGL Supplier Code of Conduct, we may require the supplier to provide us with a corrective action plan.


#### Failure to comply with the plan

Should the supplier fail to comply with the plan, then AGL may choose to exit the supplier relationship. Details on when AGL may exit a supplier relationship are documented in Section 6.4.3 of this Statement.

## 6. Managing Modern Slavery Risks

### Supplier Management and Training

The business contract owner is responsible for the management and oversight of the performance of the supplier under the agreed contract. This includes ensuring that the supplier continues to operate in accordance with AGL's expectations, key contractual requirements are fulfilled, and includes oversight over the completion of any modern slavery specific corrective actions during the sourcing process. Depending on the outcomes of the risk assessment undertaken during the sourcing process, the business contract owner may also work with AGL's Modern Slavery SMEs to periodically update the risk assessment (e.g. to address any changes to geographic operations or to monitor external sources for any new relevant information).

Inaugural supplier briefing session		
Initiative	Audience	Key highlights
<p>AGL invited our suppliers of renewable energy products to an information session that included the following topics:</p> <ul style="list-style-type: none"> <li>the importance of modern slavery risk management;</li> <li>the steps AGL is taking to manage the risk; and</li> <li>AGL's expectations of our suppliers to ensure that they proactively manage their modern slavery risk in their operations and supply chain.</li> </ul>	<p>Training was targeted to suppliers of solar panels, batteries and inverters.</p> <p>Approximately 70 personnel from more than 25 supplier organisations from locations across Australia, China, Singapore, Austria, Germany and the United States of America attended the training session.</p> 	<p>Supplier feedback was positive with several suppliers requesting that a similar webinar be conducted in FY25, a request that will be honoured as part of our FY25 modern slavery management work program.</p>

### Due Diligence and management of wholesale markets' counterparties

Wholesale markets transactions follow a separate due diligence process due to the nature of the activities performed, the risks associated with the activities and the need to comply with specific relevant regulatory requirements.

As was the case in FY23, AGL takes a risk based approach to assessing any new counterparties involved in the physical supply of commodities, which may require the counterparty to complete an AGL 'Know Your Customer' questionnaire. In addition to the questionnaire, an end-to-end third-party due diligence screening and monitoring tool is used to assist with the identification and assessment of any modern slavery risks associated with the counterparty. Any high risks identified during the onboarding process are escalated to AGL's Modern Slavery SMEs to determine whether any corrective actions are required before proceeding with the engagement.

In FY24, AGL continued the ongoing monitoring of counterparties via a third-party due diligence system, which included monitoring counterparties for any human rights-related enforcement activity. The system continually monitors counterparties and provides alerts when the risk profile of a counterparty changes. The alerts are reviewed and where necessary, are discussed with the counterparty which may result in corrective actions (including exiting a supplier relationship (see [Section 6.4.3](#))) being put in place to address the issue. During FY24, no alerts were raised against counterparties which required remediation action to be taken.



### Case study – Managing modern slavery risk associated with major projects.

As we transition our energy portfolio, AGL will continue to engage in a variety of major construction projects that involve large numbers of suppliers with complex supply chains that introduce a high level of complexity for the effective management of modern slavery risk. To support the management of this risk, AGL made updates in FY23 to the standard modern slavery clause in our major project contract to require the major contractor to certify that the major contractor and its subcontractors have effective modern slavery risk management practices in place in their respective operations and supply chain.

The updated clause was first used in our major contract for constructing the Liddell Battery, which reached Financial Investment Decision in late 2023. In addition to complying with modern slavery laws and investigating and addressing allegations of modern slavery in its operations and supply chain, the clause requires the major contractor to provide AGL with written certification that the contractor:

- has complied with its modern slavery obligations under the contract;
- has, together with contractors directly engaged by it, effective modern slavery risk management practices in place to manage the risks of modern slavery in its operations and supply chains;
- is not aware of any modern slavery practices or modern slavery-related grievances in the operations and supply chains of its subcontractors; and
- no matters have arisen that have or may significantly affect the certification or the contractors ongoing compliance with its obligations under the contract with respect to modern slavery.

To the extent that contractor has identified an actual or potential risk of modern slavery in its operations and supply chains, the certification requires the contractor to describe the risk and how it will be managed and remediated.

The certification was provided prior to the contractor mobilising to the site and a re-certification is required on each anniversary of the contract's commencement date. AGL received the first certification on 20 May 2024 and will receive a further certification in May 2025.

### Modern Slavery Deep Dive and Social Audits

Complementing AGL's Modern Slavery Risk Assessment Process set out in [Section 6.3.2](#), AGL in certain situations will engage in supplier deep-dives and/or social audits to ensure we are partnering with suppliers that meet our expectations. These steps will generally be taken where our risk assessment process indicates that additional due diligence is needed to assess a supplier that has been flagged as a high or very high risk for modern slavery.

#### Supplier deep dives and social audits



Following a Modern Slavery Risk Assessment, a Modern Slavery Deep-Dive is triggered where a completed Modern Slavery Questionnaire indicates that additional information is required from the supplier. The deep-dive process assists with validating the supplier's response to the questionnaire and provides further information regarding the approach the supplier is taking to manage its modern slavery risk. In circumstances where the Modern Slavery Deep-Dive does not provide AGL with satisfactory information about the supplier's modern slavery risk management practices, or where greater assurance is required, AGL will also engage in a social audit of the supplier. Social audits help provide an 'on the ground' assessment of a supplier's practices and assists with the identification of red flags which may indicate that modern slavery-related practices exist.

In FY24, AGL conducted a deep-dive on our solar supply chain and continued to undertake social audits across this area of our business.

### Solar supply chain deep-dive

In addition to ongoing activities performed to identify and manage modern slavery risk within AGL's operations and supply chain, AGL conducts a number of targeted activities to gain a greater understanding of the modern slavery risk associated with both new and higher inherent risk suppliers.

One area that has been subject to increased scrutiny by AGL over recent periods due to its inherent modern slavery risk is AGL's solar panel-related supply chain and broader business operations (as further described in [Section 6.2.2](#)). AGL supplies and installs solar panels and related equipment to residential, commercial and industrial companies.

Renewables, and specifically solar panels, play a vital role in Australia's energy transition and are fundamental to AGL's strategic objective to help our customers decarbonise the way they live, move and work. However, as noted in our risk assessment, the solar panel industry is also associated with a relatively high risk of modern slavery, and the supply chains associated with solar panel manufacturing have become increasingly opaque over time.<sup>1</sup>

1. Over-Exposed Ughur Region Exposure Assessment for Solar Industry Sourcing Sheffield Hallam University November 2023.

## 6. Managing Modern Slavery Risks

Over previous periods, AGL has reported on steps taken to further understand the broader supply chain associated with the purchase and installation of solar panels and related products. This area has remained a focus in FY24, with additional targeted work performed throughout the reporting period.

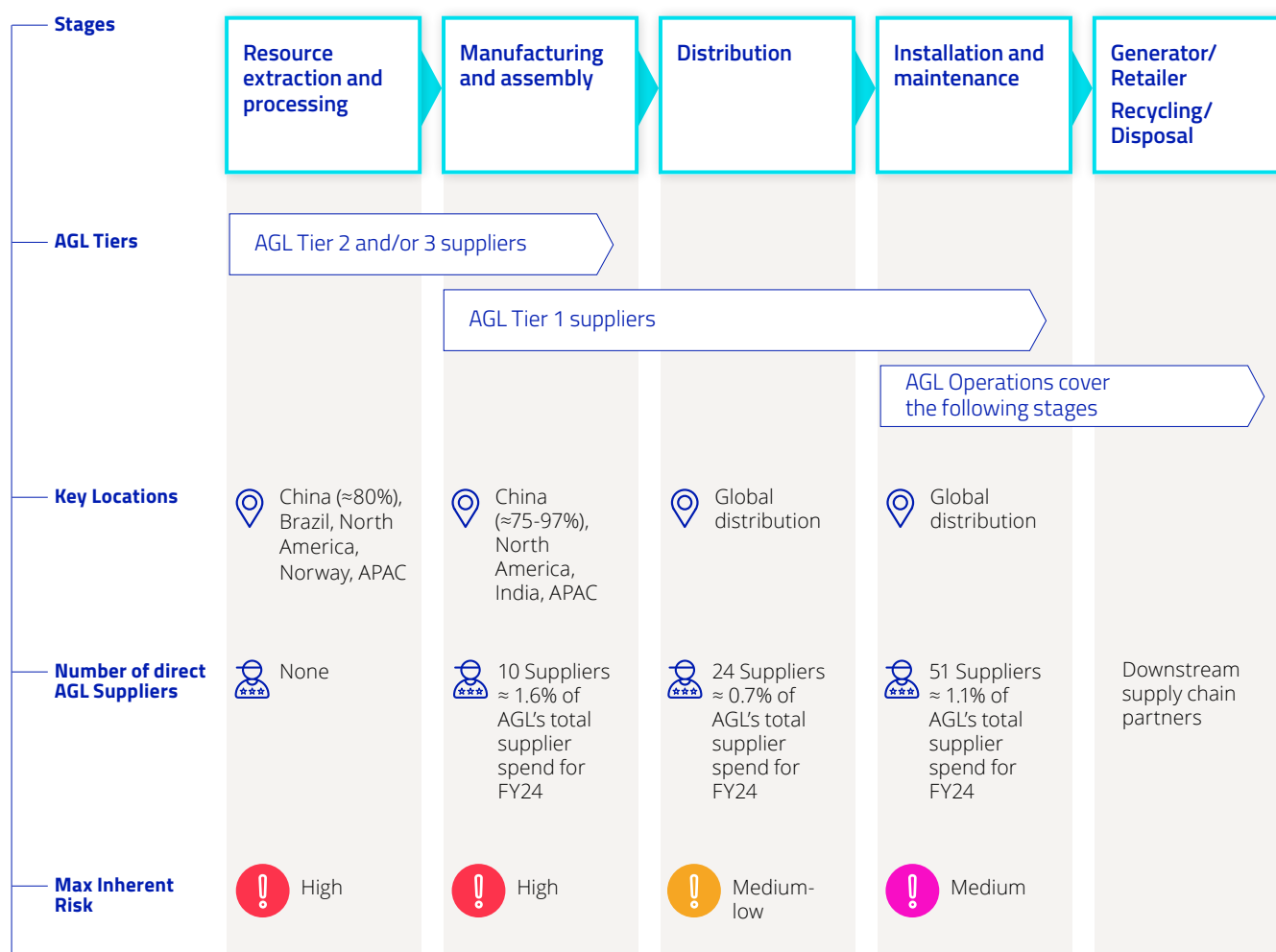
### Deep-dive methodology

Building on the activities undertaken in prior periods to assess our solar supply chain, AGL continued to analyse the extended supply chain in FY24 to further understand relevant modern slavery-related risks. As part of this work, an independent third-party was engaged to assess the risk exposure of five of AGL's critical solar panel suppliers located in regions identified as inherently high-risk. The assessment was comprised of the following steps:

1. Analysis of the end-to-end solar supply chain was conducted. This identified key stages in the solar value chain, AGL's direct and indirect relationships with suppliers within each of these stages, and assessed the inherent risk associated with each stage of the supply chain.
2. A sample of five of AGL's critical suppliers were examined in detail to obtain a greater understanding of the modern slavery-related risks resulting through their engagement. This included review of key supplier information, review of externally sourced data relating to each supplier (such as media reports and academic papers relating to the solar supply chain), and interviews with key representatives from each supplier.
3. For the sample of critical suppliers identified in step 2 above, 100 'tier 2 suppliers' (i.e., the suppliers of AGL's suppliers) were assessed for modern slavery risk through review of their sourcing locations, modern slavery risk management, and publicly available information relating to human rights and modern slavery-related allegations or findings.

The below diagram provides an overview of the solar supply chain and those areas that formed part of the independent third parties' assessment.

### Solar Supply Chain Modern Slavery Risk Assessment



## Key insights

The work performed provided AGL with a more detailed understanding of our broader solar-related supply chain, and the specific risks associated with tier 2 suppliers. The work also confirmed detailed risk assessments performed as part of supplier engagement and ongoing management. A number of recommendations were identified through the engagement relating to further collaboration with our supply chain to enhance modern slavery protections and continued analysis of tier 2 and tier 3 suppliers. These recommendations are being considered and prioritised by management and will form an input into our workplan for FY25.

## Social audits

Social audits complement our modern slavery risk management processes. Our social audit guidelines, developed in FY23, continue to provide guidance on the relevant factors to consider when engaging in a social audit, including how to select an appropriate social auditor, the social audit standards that should be used by the social auditor, and how AGL should respond when non-conformances are identified.

In our FY23 Statement we reported that we had commenced our social audit program with four social audits of solar module suppliers based in China. Our audit program was expanded in FY24 to include nine suppliers located in China involved in the production of solar modules, batteries, inverters, solar-related componentry, and logistics. These social audits comprised of nine SMETA-4 audits and five factory audits, all of which were completed by our third-party auditor. The audits identified a number of opportunities to enhance the processes, controls and practices of these suppliers, and specific to modern slavery risk management, included the identification of non-conformances relating to excessive work hours and the safe storage of hazardous materials in some cases. Where non-conformances were identified, remediation plans and timelines have been agreed between the auditor and the supplier.

Non-conformances identified and the related agreed actions are closely monitored by AGL and reviewed as part of our ongoing monthly engagement with the relevant supplier. Through engaging social auditors to identify both improvement opportunities and non-conformances, AGL obtains a greater level of assurance that suppliers are managing this risk and is able to proactively collaborate with the suppliers to deliver sustainable solutions that improve their ability to manage the risk of modern slavery.

Remediation plans implemented throughout FY24 with suppliers have focused on:

- the implementation of controls to reduce overtime hours to ensure working hours do not exceed statutory limits; and
- the adoption of practices to ensure workers receive at least one day off for every seven-day period.

All identified non-conformances are due to be closed out by the end of the second quarter of FY25.

## 6. Managing Modern Slavery Risks



### 6.4 Grievance Response

AGL applies a ‘survivor first’ approach when receiving, investigating, and responding to an allegation or confirmed instance of modern slavery.

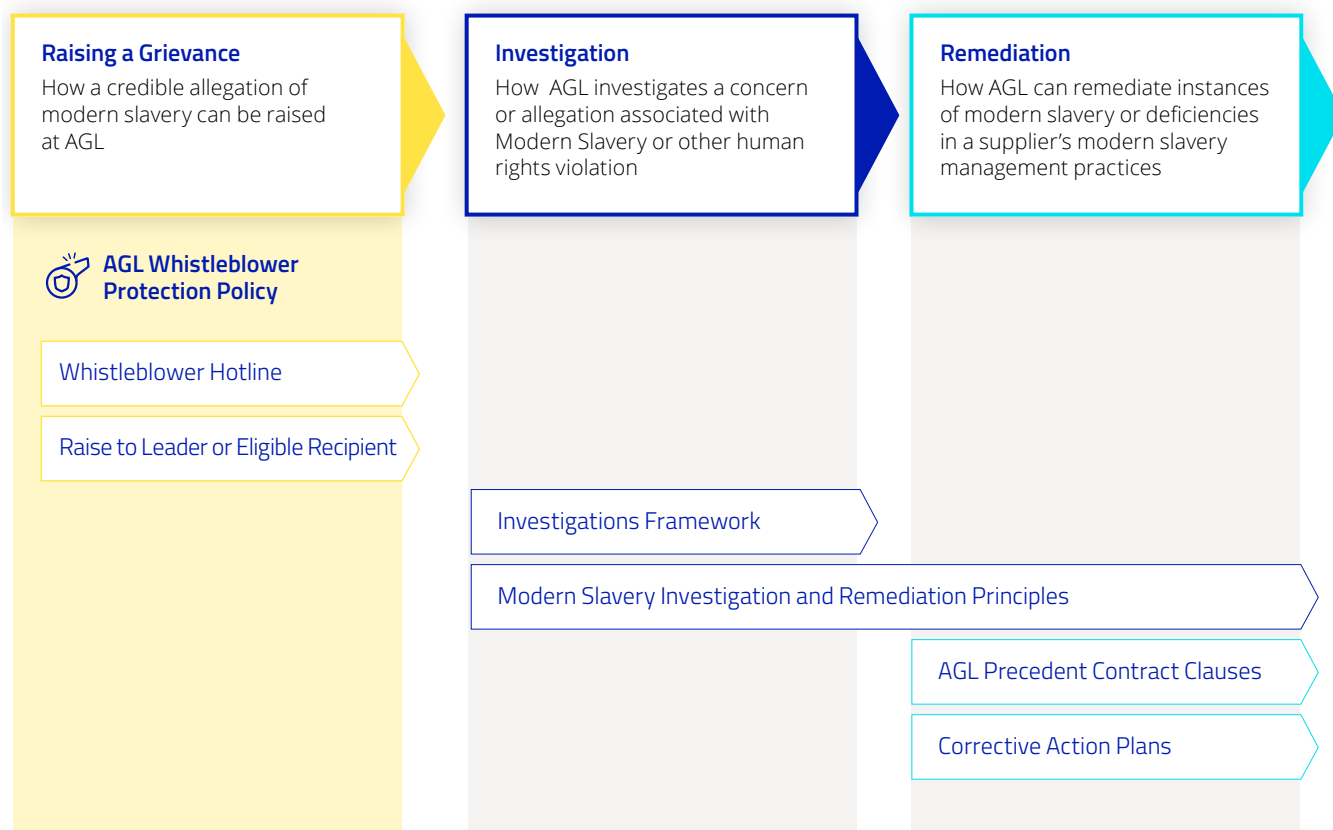
Embedding a survivor first approach	
During the assessment, investigation and remediation process, AGL adopts a survivor first approach in relation to any incident, concern, or allegation in alignment with the recommendations set out in the UNGPs.	
Assessment and investigation stage – a survivor first approach could include:	Remediation Stage – the approach could include:
<ol style="list-style-type: none"><li>1. Providing continuous and open communication with the discloser and / or survivor during the investigation such that they remain fully informed throughout the investigation process.</li><li>2. Ensuring details of the discloser and survivor remain confidential to protect them from further harm.</li><li>3. Communicate in a way which upholds AGL as a reliable and trusted entity that will support survivors of modern slavery.</li></ol>	<ol style="list-style-type: none"><li>1. Engaging with survivors in a transparent manner to ensure that there is fair and direct remediation which addresses their immediate needs.</li><li>2. Incorporating actions which address the needs of survivors which could include providing adequate access to legal and health services free from imbalances of power, language barriers, intimidation and trauma.</li><li>3. Incorporating actions and relevant controls into processes and systems to prevent the harm from occurring.</li></ol>

Our grievance response is governed by our Investigations Framework and is supported by our Modern Slavery Investigation and Remediation Principles (**Principles**). The Principles operate in circumstances where AGL becomes aware of a credible allegation of modern slavery relating to our business activities or relationships, including our supply chain. The Principles are comprised of three parts:

- **Part One – Investigation:** provides a decision tree to inform our immediate response to a concern or allegation associated with modern slavery, which will involve investigating the matter.
- **Part Two – Remediation:** explains the key principles that need to be considered when remediating an incident, a substantiated concern or an allegation associated with modern slavery.
- **Part Three – Exiting Supplier Relationships:** outlines the key principles that need to be considered when considering whether to exit a supplier relationship due to modern slavery as a last resort.

The Principles act as a guide only and are complementary to AGL’s existing policies and frameworks, including our Whistleblower Protection Policy and Human Rights Policy. The diagram on page 35 provides a summary of how the Principles interact with our existing processes and procedures that are responsive to an allegation of modern slavery.

## AGL's Modern Slavery Response



### 6.4.1 Raising a Grievance and Initial Assessment

The table below provides a summary of the various ways in which a grievance can be raised:

Raising a grievance or allegation relating to modern slavery or human rights violations	
Channel	Key call outs
<b>Code of Conduct</b>	AGL's Code of Conduct encourages employees to report to their immediate leader circumstances where the Code of Conduct has been breached (or where there is a reasonable suspicion of a breach). Where necessary, a matter can be reported directly to AGL's People & Culture team or to the responsible Executive Team member.
<b>Supplier Code of Conduct</b>	AGL suppliers are required to notify AGL of any actual or suspected breach of the Supplier Code of Conduct by the supplier or by their supply chain.  The Code requires suppliers to read, understand and comply with the requirements of AGL's Whistleblower Protection Policy and provide workers with access to the policy and to effective grievance procedures to ensure their workers and supply chain can submit a grievance without suffering any detriment.
<b>Whistleblower Protection Policy</b>	Current and past employees, officers, contractors, suppliers (including employees of suppliers) and their associates are able to make a report and express any concerns relating to AGL's activities and suspected violations of our policies, values and/or legal requirements via our Whistleblower Protection Policy.

Once a grievance is raised, senior management will conduct an initial assessment of the grievance to determine if it should be investigated. Where appropriate and possible, AGL may invite the discloser to provide AGL with further information about the grievance.

No modern slavery related grievances were reported throughout the reporting period.

### 6.4.2 Investigation

In FY24, AGL continued to leverage the AGL Investigation Framework, which sets out the minimum standards that must be followed for investigations conducted by AGL. Once sufficient information relating to an allegation of modern slavery has been obtained, AGL will tailor the investigation to address the substance of the allegation and in doing so will have regard to those matters set out in the Principles.

## 6. Managing Modern Slavery Risks

### 6.4.3 Remediation

Our approach to remediation will depend on the nature and extent of our involvement in the modern slavery incident based on the 'cause, contribute, directly linked' continuum of involvement set out in the UNGPs. The Principles set out that if AGL has reason to believe that modern slavery has or is occurring, AGL will take steps to identify the nature of its involvement in the modern slavery by considering whether AGL caused, contributed to, or is directly linked to the modern slavery harm.

The table below explains how we have adopted the UNGP's continuum of involvement approach when considering remediations steps to be taken when responding to an occurrence of modern slavery.

Involvement Level <sup>1</sup>	Cause	Contribute	Directly Linked
<b>Definitions of how AGL could be involved in modern slavery</b>	AGL's actions or omissions may directly result in modern slavery occurring. Due to the controls set out in this Statement, we do not consider we are at risk of causing modern slavery.	AGL's actions or omissions may facilitate or incentivise modern slavery. The controls set out in this Statement help to mitigate the risk we could contribute to modern slavery.	AGL's products or services could be connected to modern slavery through the activities of another entity in our value chain relating to those products or services. As set out in this Statement, AGL takes a range of steps to manage this risk.
<b>Principles for remediation</b>	<ul style="list-style-type: none"> <li>• Stop or prevent impact.</li> <li>• Provide for or cooperate in remediation.</li> <li>• Support victims where necessary.</li> </ul>	<ul style="list-style-type: none"> <li>• Stop or prevent contribution.</li> <li>• Use leverage to mitigate any remaining impact so far as possible.</li> <li>• Provide for or cooperate in remediation.</li> <li>• Decide whether to continue the business relationship.</li> </ul>	<ul style="list-style-type: none"> <li>• Build or use leverage to prevent and mitigate the impact.</li> <li>• Demonstrate ongoing effort to mitigate impacts.</li> <li>• Take a role in remediation where possible.</li> <li>• Decide whether to continue the business relationship.</li> </ul>
<b>Hypothetical example from the energy sector</b>	A development subcontractor constructing an energy asset exploits its workers, including confiscating their passports and restricting their freedom of movement.	An energy company disregards credible evidence that third party workers on its sites are being exploited by a supplier, including by being charged excessive recruitment fees.	An energy company sources renewable energy technology from a supplier and sets clear requirements for the responsible sourcing of key materials used in the technology. The supplier breaches these requirements by sourcing materials from a high risk sub-supplier, which is subsequently found to be using forced labour.

1. From the UN Guiding Principles



Depending on the nature of our involvement (cause, contribute or directly linked) and the details of the incident, we will either develop a remediation action plan or encourage the relevant supplier to establish a corrective action plan to ensure the supplier's ongoing compliance with AGL's Supplier Code of Conduct. The items set out in the table below inform the development of a Remediation Action Plan by AGL alone or where necessary, in collaboration with a supplier.

Items that inform the development of a remediation action plan	
Key items	Considerations
<b>Engagement with survivors or their representatives</b>	The response will consider how to engage with survivors. Should a representative be required, the representative should be a person by whom all survivors agree to be represented.
<b>Remediation Facilitator</b>	In some circumstances there may be scope to explore the appointment of a Remediation Facilitator. The appointment must be someone that all parties agree to (including survivors or their representatives).
<b>Immediate and long-term needs of survivors</b>	<p>The remediation plan is focused on engagement with survivors and/or their representatives to determine how to remediate the harm. Depending on the circumstances, the following matters are to be considered for inclusion in the plan:</p> <ul style="list-style-type: none"> <li>• Responding to specific immediate needs. For example, the provision of safe accommodation, meals, counselling, healthcare and in some instances legal and financial assistance as a matter of priority.</li> <li>• Managing further risks to the survivors.</li> <li>• Actions to return the survivors to the position they would have been in before the harm, if possible, and providing compensation for the harm done.</li> <li>• Consideration of the long-term needs of the survivor, such as healthcare, reintegration to the workforce and counselling.</li> <li>• Changes to prevent the harm from reoccurring, such as changes to the supplier's or customer's recruitment processes or implementation of enhanced due diligence checks.</li> </ul>
<b>Transparency and monitoring of the plan</b>	<p>Commitments made under the plan, either by AGL, a supplier or third parties should be monitored to help ensure the commitments are implemented in a timely manner.</p> <p>The plan should include requirements relating to the monitoring of key remediation actions, which may include follow up with survivors or their representative.</p> <p>Follow up audits with a supplier may be needed to verify how the supplier is progressing with closing out or remediating items set out under the plan.</p>

## Exiting a Supplier Relationship

Deciding to exit a supplier relationship is a complex decision that AGL will only take after considering all possible alternatives to remediate and prevent the re-occurrence of modern slavery practices or other human rights harm. Where we do decide to exit a supplier relationship due to modern slavery concerns, it is important that we take a responsible approach which may also necessitate remediating any modern slavery harm that has occurred. Situations that may warrant an exit include circumstances where we are directly linked to modern slavery and the relevant supplier is unwilling to improve its practices and remediate its impacts, and we have exhausted our options for building and using our leverage to change the supplier's practices.

If we need to consider an exit, we will consider the items set out in the table below which cover both the decision to exit and the need to manage any post-exit consequences.

Exiting a supplier relationship	
Key items for consideration	Assessment and application
<b>Exhaust our options to build and use leverage to change the supplier's practices</b>	<ul style="list-style-type: none"> <li>• We expect to see the supplier take immediate action and make clear commitments proportional to the actual or potential modern slavery harm we are concerned about.</li> <li>• Changes to a supplier's actions are formally agreed with the supplier and actions are tracked.</li> </ul>
<b>The potential for human rights impacts and the need for mitigation</b>	<ul style="list-style-type: none"> <li>• Consider credible assessments of the potential human rights harm (e.g. feedback from civil society groups or engagement with rightsholders).</li> <li>• Assess what actions are available to mitigate any potential human rights impacts.</li> </ul>
<b>Temporary disengagement with the supplier</b>	<ul style="list-style-type: none"> <li>• Consider if a temporary suspension of the supplier relationship will improve its modern slavery risk management practices.</li> </ul>
<b>The materiality of the supplier may warrant the continuation of the supplier relationship</b>	<ul style="list-style-type: none"> <li>• Where the supplier is a material supplier to AGL, reasons for the supplier's materiality are to be documented together with the steps taken to confirm the availability of alternate suppliers. Continue to engage the supplier to ensure they are taking proactive steps to address our concerns.</li> </ul>
<b>Communicate reasons for disengaging with a supplier</b>	<ul style="list-style-type: none"> <li>• Formally communicate with the supplier to advise our reasons for disengaging.</li> </ul>

## 6. Managing Modern Slavery Risks



### 6.5 Monitoring

Our approach to managing the risks associated with modern slavery and broader human rights constantly evolves as we learn from our experience, and the experiences of others, and as we refine our processes and engagement with our suppliers. In order to identify and prioritise improvement opportunities, we monitor the effectiveness of our existing modern slavery Framework and broader modern slavery risk management practices through a number of key activities, which are summarised below.

#### 6.5.1 Tracking & Reporting

The table below sets out the mechanisms used to monitor the progress made on initiatives to manage and mitigate our modern slavery-related risks:

Tracking and reporting mechanism	Key call out
<b>Board Audit &amp; Risk Management Committee (ARMC) Reporting</b>	GRCI regularly reports material risks and compliance matters to the ARMC, including reporting on AGL's modern slavery risk management practices, improvement initiatives and risks.  GRCI submits the Statement to the ARMC for its endorsement before it is considered and approved by the Board.
<b>Reporting</b>	On a regular basis AGL's Modern Slavery SMEs provide status reporting to the General Manager, GRCI and the Modern Slavery Working Group on the progress made on the modern slavery management improvement initiatives being implemented throughout the reporting period.
<b>Engagement between GRCI and business unit risk and compliance teams</b>	GRCI plays an ongoing role supporting the business with modern slavery improvement initiatives.
<b>Engagement with the Modern Slavery Working Group (MSWG)</b>	The MSWG regularly discusses the changing risk landscape associated with modern slavery and the associated initiatives in place to address modern slavery risks.
<b>Periodic updates to the Executive Sponsors</b>	The General Manager, GRCI provides regular updates to the Executive Sponsors of AGL's Modern Slavery Program, which includes a broad overview of progress made throughout the reporting period.

### 6.5.2 Measuring Effectiveness

To assist with monitoring the effectiveness of our modern slavery risk management activities, AGL has defined key indicators of effective modern slavery risk management that align to the elements and sub-elements of our modern slavery Framework, and which relate to actions and controls that an organisation should have in place to identify, assess, and manage its modern slavery risks.

The table below provides a summary of our performance against our key indicators.

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	How AGL measures effectiveness against this indicator	Assessment for FY24
<b>Commitment and Governance</b>	Roles, responsibilities and accountabilities for the management of modern slavery are clear, appropriately designed and effectively embedded to drive the management of modern slavery risk enterprise wide.	The roles, responsibilities and accountabilities associated with the management of risk, including modern slavery risks, are documented in AGL's Risk Management Policy and AGL's Human Rights Policy, which are reviewed every two years.	<p>Satisfactory – both AGL's Human Rights Policy and AGL's Risk Management Policy continued to be operational and successfully embedded throughout the reporting period. Both policies will be reviewed and updated where relevant in the first half of FY25, in alignment with defined review cycles.</p> <p>Training and awareness programs throughout the reporting period have supported personnel in having a clear understanding of the roles and responsibilities involved in AGL's modern slavery risk management process.</p> <p>Further details are provided in <a href="#">Section 6.1</a> of this Statement.</p>
	Continuous improvement is embedded into AGL's approach to the management of modern slavery risks.	AGL seeks periodic review of its modern slavery Framework by an independent party.	<p>Satisfactory – whilst no independent review of AGL's Framework was completed throughout the reporting period, AGL engaged third party subject matter experts in the area of human rights to discuss and advise on ongoing improvements to our modern slavery risk management practices and processes, and a number of improvements were implemented across FY24.</p> <p>Further details are provided in <a href="#">Section 6.3</a> of this Statement.</p>
	Policies associated with modern slavery risk management include a publicly available position regarding the organisation's approach to modern slavery management approved by senior management or the Board.	AGL policies relevant to the management of modern slavery are reviewed and approved by the AGL Board at least every two years. The review of policies includes an assessment of internal and external factors (such as industry trends) and internationally recognised standards, to ensure AGL's modern slavery position continues to meet stakeholder expectations and aligns with AGL's values.	<p>Satisfactory – the following Board approved policies (most recently updated in FY23) remained publicly available on AGL's website which articulate AGL's approach to modern slavery management:</p> <ul style="list-style-type: none"> <li>• Human Rights Policy,</li> <li>• Code of Conduct, and</li> <li>• Whistleblower Protection Policy.</li> </ul> <p>These policies will be reviewed and submitted to the Board for approval in FY25, in alignment with their defined review cycles.</p> <p>Further details are provided in <a href="#">Section 6.1.2</a> of this Statement.</p>

## 6. Managing Modern Slavery Risks

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	How AGL measures effectiveness against this indicator	Assessment for FY24
<b>Risk Identification</b>	The organisation has a formalised approach for identifying modern slavery risks which is appropriate for the organisation's context, operations and supply chains.	AGL's risk identification methodology and key risk indicators are regularly reviewed to validate that they remain fit for purpose and appropriate for AGL's context, operations and supply chains.	Satisfactory – during the reporting period AGL's key risk indicators were assessed as appropriate for its business context, operations and supply chains. AGL's Risk Management Standard, which sets out AGL's overall approach to risk management, was reviewed and updated during the reporting period.  AGL's Board considered AGL's enterprise risk management framework and concluded that the framework was designed and operating effectively.  Further details are provided in <a href="#">Section 6.2</a> of this Statement.
	The organisation can describe the risks of modern slavery within its operations.	AGL conducts an annual enterprise-wide review of its modern slavery risk profile to validate the modern slavery risks within its operations and update these as required.	Satisfactory – AGL conducted its annual enterprise-wide review of its modern slavery risk profile in FY24 and the modern slavery risks within its operations are set out in <a href="#">Section 6.2.1</a> of this Statement. Modern slavery risks associated with acquired entities that have not been fully integrated into AGL's overarching governance structure and their management are documented in <a href="#">Section 7</a> of this Statement.
	The organisation can describe the risks of modern slavery within its supply chains.	AGL regularly updates modern slavery risks within its supply chain and conducts an annual enterprise-wide review of its modern slavery risk profile to validate the modern slavery risks within its supply chains and update these as necessary.	Satisfactory – AGL conducted its annual enterprise-wide review of its modern slavery risk profile in FY24 and the modern slavery risks within its supply chain are set out in <a href="#">Section 6.2.2</a> of this Statement. Modern slavery risks associated with AGL's owned and controlled entities, and their management are documented in <a href="#">Section 7</a> of this Statement.
<b>Risk Management</b>	The organisation undertakes training and capacity building of relevant personnel within the organisation on salient modern slavery risks, key policies, and standards regarding human rights and the management of modern slavery risks.	<ul style="list-style-type: none"> <li>AGL's Modern Slavery SMEs are responsible for facilitating modern slavery training, and identifying key gaps in knowledge of relevant personnel, considering feedback from training previously delivered.</li> <li>The percentage of employees who have completed mandatory training on AGL's Code of Conduct, which includes training on AGL's Human Rights Policy and AGL's Whistleblower Protection Policy.</li> </ul>	Satisfactory – as documented in <a href="#">Section 6.3</a> of this Statement, AGL's Modern Slavery SMEs facilitated numerous training sessions which also included training delivered to high risk suppliers in our Sustainable Business Energy Solutions business unit with positive feedback received from attendees who attended the training sessions.  In FY24, 98% of the organisation completed compliance training on AGL's Code of Conduct which addresses modern slavery risk management.
	The organisation assesses suppliers for the risks of modern slavery prior to their engagement.	AGL performs a risk-based assessment of the modern slavery risks relevant to new suppliers.	Satisfactory – in FY24, AGL improved its procurement processes and continued to effectively assess and evaluate the modern slavery risks associated with suppliers.
	The organisation assesses and audits select suppliers to measure compliance with applicable regulations.	<ul style="list-style-type: none"> <li>Number of supplier audits completed over the period.</li> <li>AGL engages its third-party auditors to scope further audit opportunities over its high-risk suppliers.</li> </ul>	Satisfactory – during FY24, AGL conducted social audits, with nine suppliers subject to audit (compared to four in FY23). AGL will continue to progress its social audit program throughout FY25.

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	How AGL measures effectiveness against this indicator	Assessment for FY24
<b>Grievance Response</b>	A trusted and accessible grievance mechanism is available to all stakeholder groups (employees, customers and suppliers) for the raising of modern slavery-related concerns.	<ul style="list-style-type: none"> <li>AGL periodically reviews its grievance mechanism to assess its effectiveness.</li> <li>AGL's FY24 Listening Survey assessed whether employees feel safe to speak up if they have concerns.</li> </ul>	<p>Room for improvement – whilst AGL took steps in FY24 to improve the visibility of its Safe To Speak Up program by outlining the program on 'Our Commitments' section of the AGL website, more work can be done to promote the program to our suppliers and their workers. Further steps will be taken in FY25 to further its promotion.</p> <p>Results from AGL's FY24 Listening Survey identified a 4 percent point uplift in employees feeling safe to speak up<sup>1</sup>.</p>
	Remediation processes exist which include processes to investigate allegations of modern slavery and remediate instances of modern slavery.	AGL assesses the effectiveness of remediation processes against recognised standards and best practice, such as the criteria set out in the UNGPs.	<p>Room for improvement – AGL will continue to embed and promote our Modern Slavery Investigation and Remediation Principles across the business.</p> <p>Further details can be found in <a href="#">Section 6.4</a> of this Statement.</p>
<b>Monitoring</b>	Formal reporting over the organisation's response to modern slavery is of a form and frequency that is appropriate for the organisation and accessible to intended audiences.	AGL obtains feedback from independent third-party consultants on its Statement annually to identify improvement opportunities with our reporting.	Satisfactory – AGL received and actioned feedback from external third parties on its FY23 Statement.

1. Our FY23 Statement reported a 16 percent point uplift in employees feeling safe to speak up over our FY22 result in error. The uplift in FY23 as compared to FY22 was 12 percentage points.

# 7. Consultation

This Statement is submitted as a joint statement. It applies to all brands and legal entities which form part of the AGL Group.




The AGL Group operates with a single overarching governance structure that is supported by uniform systems and processes that allow a consistent risk management approach to be adopted for the management of operational and supply chain risks (including modern slavery risks) across all entities comprised within the AGL Group. This structure provides for and embeds ongoing consultation and engagement across the AGL Group allowing for extensive consultation as part of the development of this Statement.

A consultation process was undertaken as part of the development of this Statement with subsidiaries that operate independently or partially independent of AGL's Modern Slavery Framework and supporting processes. In FY24, this included consultation with Energy360 and OVO.

To support the consultation process, AGL's Modern Slavery SMEs took steps to revalidate the FY23 risk profile for both Energy360 and OVO.

## 7.1 Energy360's Modern Slavery Risks and Associated Management

As part of our consultation with Energy360 the following risks were revalidated as being applicable to Energy360 throughout the FY24 reporting period:

Modern Slavery Risks	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis
<b>Engaging Contractors and Sub-contractors</b>		
In certain circumstances, Energy360 engages contractors and sub-contractors to support the installation and maintenance of its biogas systems for customers. These are often in regional areas and therefore require the use of subcontracting to deliver on these services. Instances involving contracting and sub-contracting in regional areas limit Energy360's direct oversight of working conditions and may result in workers being subject to improper working conditions.	 	<p><b>Directly Linked:</b> Illustrative risk scenario: Energy360 may engage contractors or sub-contractors for the installation and maintenance of biogas systems in regional areas whose workers may be subject to working conditions of forced labour.</p> <p><b>Contribute:</b> Illustrative risk scenario: Energy360 pricing or purchasing practices may place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in their operations.</p>
<b>Sourcing of components</b>		
Energy360 is required to source specific components for their biogas systems, which include metal materials and minerals. The manufacturing and extraction of such materials have been associated with lower profit margins and tiered production systems, and are widely considered as high risk for modern slavery.		<p><b>Directly Linked:</b> Illustrative risk scenario: Energy360 sources components for biogas systems which include materials manufactured or sourced from the use of forced and/or child labour.</p> <p><b>Contribute:</b> Illustrative risk scenario: Energy360's purchasing practices associated with the procurement of products for biogas systems place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in Energy360's supply chain.</p>



### 7.1.1 Managing Energy360's Modern Slavery Risks





Through our consultation with Energy360 it was confirmed that the following management processes are in place to manage the risk of modern slavery in its operations and supply chain:

- Energy360's legal counsel is responsible for liaising with AGL's Modern Slavery SMEs to ensure Energy360 is adopting and applying effective modern slavery risk management practices.
- AGL's Human Rights Policy applies to Energy360 and affirms a commitment to respect the human rights of its employees, customers, and suppliers. In addition, AGL's Whistleblower Protection Policy applies to Energy360 enabling personnel to raise concerns relating to human rights violations or modern slavery.
- AGL's SRC is completed by Energy360 personnel to determine the inherent modern slavery risk associated with a procurement activity. As for AGL suppliers, an Energy360 supplier will be required to submit a MSQ in circumstances where the outcome of the SRC deems a sourcing activity to have an elevated modern slavery risk.
- As was the case in FY23, Energy360, throughout the reporting period, continued to operate its Quality, Safety and Environmental Management System (**QSEMS**) which outlines the health, safety and environmental practices and procedures that are required to be followed by Energy360. From a modern slavery management perspective, the QSEMS affirms Energy360 will provide all employees, sub-contractors, clients and visitors with a workplace that is safe and without risk to health and safety. This commitment extends to ensuring operations and activities do not place the local community at risk of injury, illness or damage. To achieve this commitment, the QSEMS confirms Energy360's preparedness to take appropriate actions to ensure compliance with legislative obligations and relevant standards, a requirement overseen and managed by senior management.
- As was the case in FY23, Energy360 contracts include clauses requiring compliance with AGL's Supplier Code of Conduct and relevant laws and regulations, including specific clauses associated with compliance with relevant modern slavery laws and regulations.

During the FY25 period, Energy360 will be fully integrated into AGL's operations and standard management processes. This will result in Energy360's modern slavery risk management practices being managed by AGL in accordance with our standard modern slavery risk management practices and processes.

## 7.2 OVO Modern Slavery Risks and Associated Management

As part of our consultation with OVO the following risks were revalidated as being applicable to OVO throughout the FY24 reporting period:

Modern Slavery Risks	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis
<b>Engaging Temporary Labour</b>		
In certain circumstances, OVO will engage temporary labour. While temporary labour will likely be in the form of call centre staff and on occasion professional services, such as accounting and legal services, a hybrid working model for administrative tasks may result in the use of improper labour practices.	 	<p><b>Directly Linked:</b> Illustrative risk scenario: OVO engages a third-party supplier to support its business operations. The third-party engages in poor or unethical labour practices.</p> <p><b>Contribute:</b> Illustrative risk scenario: pricing or purchasing practices place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in their operations.</p>
<b>Sourcing Electronic Goods</b>		
OVO is required to source electronic goods such as laptops and communication equipment. The electronics manufacturing industry is a high-risk industry for modern slavery due to low profit margins and tiered production systems typically associated with the industry. Manufacturing often takes place in less developed countries with minimal legal and regulatory protections, hence there may be less oversight over labour rights. In addition, modern slavery risks may be present within the supply chains of these products, particularly in the sourcing of raw materials from high-risk geographies.		<p><b>Directly Linked:</b> Illustrative risk scenario: OVO sources electronic goods such as modems and laptops which include components or materials manufactured in high-risk countries which involve the use of forced and/or child labour.</p>
<b>Renewable Certificates</b>		
The renewable energy industry has been assessed as high risk for modern slavery, specifically due to the risk of forced labour and/or debt bondage. These risks arise due to risks present throughout the supply chain, from the sourcing of raw materials through to the manufacturing of products.		<p><b>Directly Linked:</b> Illustrative risk scenario: OVO purchases renewable certificates to meet its renewable energy obligations. These renewable certificates have been generated by renewable energy sources associated with the use of forced labour.</p>

## 7. Consultation

### 7.2.1 Managing OVO's Modern Slavery Risks

As an outcome of our consultation with OVO, it was confirmed that OVO continue to operationalise the various management mechanisms that were reported as being in place in our FY23 Statement. These include:

- AGL's Human Rights Policy applies to OVO and affirms its commitment to respect the human rights of its employees, customers and suppliers. In addition, AGL's Whistleblower Protection Policy applies to OVO enabling personnel to raise concerns relating to human rights violations or modern slavery.
- senior management oversee its policies and standards, including policies associated with modern slavery management. In addition, OVO's Head of Legal & Compliance and the relevant employee for the business area undertakes due diligence at the time of engaging third parties to ensure OVO is not engaging in any conduct which is not aligned with applicable laws and its internal policies, including human rights laws.
- AGL's Code of Conduct affirms OVO's commitment to act in a way that preserves human rights, including taking steps to prevent modern slavery in OVO's operations and supply chains. Formal training on the Code of Conduct is completed annually by all OVO personnel. All new OVO personnel are required to undertake training on AGL's Code of Conduct.
- continuing to operationalise its Third-Party Management Policy, which outlines due diligence processes to be undertaken before entering a contract with a third-party vendor. This policy also requires that third parties notify OVO of any compliance breaches identified, including those relating to human rights law.

In FY25, OVO remains committed to managing its modern slavery risk in accordance with these mechanisms, with a view of uplifting those processes as required, and identifying any modern slavery risk areas across its operations and supply chain that require further investigation to ensure the risk is appropriately managed, and where necessary, mitigated by appropriate controls.

## 8. Looking Forward

AGL is proud of the progress made in FY24, and the processes that we have put in place to identify, assess and mitigate the risk of modern slavery within our operations and supply chains.

We are committed to continuing to review our processes across FY25 to further improve both the management of the risk, and the transparency of our risk management processes, with the involvement and assistance of our key stakeholders including our suppliers.

Throughout the course of the FY25 reporting period we will continue to take steps to assess our upstream supply chain, particularly in those areas where modern slavery risk is high.

The table below outlines key initiatives included within our FY25 Continuous Improvement Roadmap.

Focus Area	Details
<b>Governance and risk management</b>	<ul style="list-style-type: none"><li>• Review and where necessary update AGL's Modern Slavery Framework.</li><li>• Re-assess modern slavery risks across our business units with a focus on our high-risk business areas.</li></ul>
<b>Supply chain due diligence and supplier management activities</b>	<ul style="list-style-type: none"><li>• Enhance our understanding of the supply chains (and related risks) associated with our high-risk suppliers and those operating in high-risk areas.<ul style="list-style-type: none"><li>- Extend our supplier deep dive analysis across our supply chain.</li></ul></li><li>• Monitor actions to close out the recommendations identified from the third-party deep-dive of our solar supply chain.<ul style="list-style-type: none"><li>- Leverage consistent and/or recurring findings to collaborate with our suppliers on their improvement roadmaps.</li></ul></li></ul>
<b>Training, awareness and collaboration initiatives</b>	<ul style="list-style-type: none"><li>• Take action to further communicate AGL's grievance processes to our suppliers.</li><li>• Develop and implement modern slavery e-learning for AGL personnel.</li><li>• Continue to roll out training and awareness programs to our high-risk suppliers.</li><li>• Continue to work with external stakeholders to gain further awareness of those opportunities that allow collaboration on modern slavery risk management initiatives.</li><li>• Identify further opportunities to partner with modern slavery survivor advocates and support groups.</li></ul>

# 9. Appendices

## 9.1 Appendix A

The following AGL subsidiaries are reporting entities in their own right, having met the reporting threshold under the Act in FY24.

- AGL Electricity (VIC) Pty Ltd
  - Victorian Energy Pty Limited
  - AGL Sales Pty Limited
  - AGL South Australia Pty Limited
- SEGH Pty Ltd
  - Sustainable Business Energy Solutions Pty Ltd
- AGL Generation Holdco Pty Ltd
  - AGL Loy Yang Pty Ltd
  - AGL Loy Yang Partnership
  - AGL Hydro Partnership
  - AGL Macquarie Pty Limited
- AGL Retail Energy Limited
- AGL Wholesale Gas Limited
- Perth Energy Holdings Pty Ltd
  - Perth Energy Pty Ltd
- Southern Phone Company Limited

A full list of AGL subsidiaries is available in our FY24 Annual Report. This report is available on our [website](#).

## 9.2 Appendix B

The structure, operations and supply chains of Energy360 and OVO are summarised below.

### 9.2.1 Structure, Operations and Supply Chain – Energy360

The structure and operations of Energy 360 remains consistent with the FY23 reporting period. The Energy360 group of companies consists of Energy 360 Pty Ltd, Access Way SPV Pty Ltd (**Access Way**) and Carbon Green Pty Ltd (**Carbon Green**) and is comprised of 24 employees. Access Way and Carbon Green are wholly owned by Energy 360 Pty Ltd. Access Way was established to develop an anaerobic digestion plant in Queensland and is not currently trading. Carbon Green is also not currently trading.

Energy360's business operations consist of the design, engineering, manufacture, installation, commissioning and servicing of biogas flares and biogas delivery systems. It also designs and engineers fit for purpose technology for companies with an organic waste stream for the purpose of generating biogas that provides those companies with baseload energy. Energy360's supply chain included more than 280 suppliers with an addressable spend of approximately \$7 million in FY24. Energy360's main categories of suppliers include biogas equipment manufacturers and distributors, subcontractors, transport companies, steel (stainless and mild), electrical control panels and components. The majority of Energy360's suppliers are based in Australia, but it also utilises overseas suppliers, particularly German based companies, who supply fabricated equipment that requires specialist skills and expertise to manufacture.

### 9.2.2 Structure, Operations and Supply Chain – OVO

The structure and operations of OVO remains consistent with the FY23 reporting period, albeit that in FY24 AGL acquired the remaining 49% of OVO that it did not already own (resulting in OVO becoming 100% owned by AGL). As an energy retailer, OVO retails electricity to residential customers in New South Wales, Queensland, South Australia and Victoria. The OVO team who are all based in Melbourne, are focused on simplicity, ease of service and encouraging more renewable energy into the grid. OVO provides customer service and billing capabilities through billing platforms and a contact centre located in Melbourne. OVO also manages its wholesale market risk through hedging strategies which provide acceptable management of wholesale costs and prudential requirements.

In FY24 OVO's supply chain included more than 220 direct suppliers who provide a variety of goods and services with an addressable spend of more than \$110 million. Key categories of spend for the period included wholesale electricity expenses, network tariffs charged by distributors, labour charges, IT services (including software) and office expenses. The majority of OVO's addressable spend was to Australian-based suppliers (although some of these are subsidiaries of foreign owned entities).

OVO's supply chain also includes the procurement of energy and energy-related products for its customers and operations.

## 9.3 Appendix C

The following table outlines the sections in this Statement that specifically address our actions taken to comply with the mandatory content prescribed by the Act.

Section of the Modern Slavery Act	Mandatory reporting criteria	Section(s) in this Statement	Page Reference
S16(1)(a)	Identify the reporting entity	About this Statement	2
		Appendix A and B	46
S16(1)(b)	Describe the reporting entity's structure, operations and supply chains	Section 5.1	10
		Section 5.2	12
S16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 6.2.1	21
		Section 7.1	42
S16(1)(d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 6.3.1	24
		Section 6.3.2	28
		Section 7.1	42
		Section 7.2	43
S16(1)(e)	Describe how the reporting entity assesses the effectiveness of these actions	Section 6.5.2	39
S16(1)(f)	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe the consultation with the entity giving the statement)	Section 7.1	42
		Section 7.2	43
S16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 6.1	15
		Section 6.4	34
		Section 6.5	38
		Section 8	45



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