

Modern Slavery Statement

Statement for 2025



Contents

Foreword	3
Acknowledgement of Country	4
Criteria 1 – Identify the reporting entity	5
Criteria 2 – Structure, operations and supply chains	6
Criteria 3 – The risks of modern slavery practices in the operations and supply chains	19
Criteria 4 – Actions towards addressing the risk of modern slavery in our supply chain	22
Criteria 5 – Effectiveness assessment	24
Criteria 6 – Consultation	25
Criteria 7 – Other relevant information	26

Disclaimer

The information contained in this report is relevant and accurate to 31 December 2025. This report and the information contained in this report is for general information only and should not be taken read or relied upon as anything other than general information.

All references to SA Power Networks Group refer to our two key businesses:

- SA Power Networks, which manages the regulated electricity distribution network serving 1.7 million South Australians, and
- Enerven, a specialist service provider in the competitive energy and telecommunications sectors.

Foreword

SA Power Networks is committed to addressing modern slavery and promoting responsible business practices. This statement is our sixth consecutive and reflects the ongoing evolution and maturity of our Responsible Supply Chain approach, as well as our dedication to safeguarding human rights across our operations and supply chain.

As South Australia's sole electricity distributor, we play a critical role in supporting the state's transition to a net-zero future. Our people and suppliers are integral to this transition, and we remain focused on operating to the highest standards of respect, integrity, and collaboration. This means a continual focus on how we operate, and during the reporting period, we introduced an updated Code of Conduct, which sets the highest standards of ethical and professional behaviour, aligned with the updated values of SA Power Networks and Enerven.

Enerven, our unregulated business, continued to grow significantly through the delivery of critical renewable energy and infrastructure projects. This growth has expanded our national footprint and supplier base, reinforcing the importance of strong supplier due diligence, capability building and consistent expectations across a diverse value chain. We are committed to making an impact, and the targeted factory audits from our Enerven team is one way in which we have achieved this in 2025.

We remain focused on strengthening our Responsible Supply Chain, working closely with suppliers to identify, assess and manage modern slavery risks and to uphold human rights. We are mindful of the impacts of global events, supply chain disruption and the energy transition on vulnerable workers, and we are committed to partnering with suppliers who share our values and commitment to ethical practices.

We acknowledge the ongoing work of Australia's Anti-Slavery Commissioner throughout 2025 in strengthening national leadership, guidance and coordination in addressing modern slavery risks. The Commissioner's early focus on engagement with government, business and civil society has helped clarify expectations and promote more consistent and practical approaches to risk identification, reporting and continuous improvement. We welcome this progress and will continue to align our Responsible Supply Chain activities with emerging guidance, contributing to industry collaboration and broader efforts to address modern slavery across the energy sector and beyond.



Andrew Bills, CEO

A handwritten signature in black ink, appearing to read 'A Bills'.



Peter Tulloch, Chairman

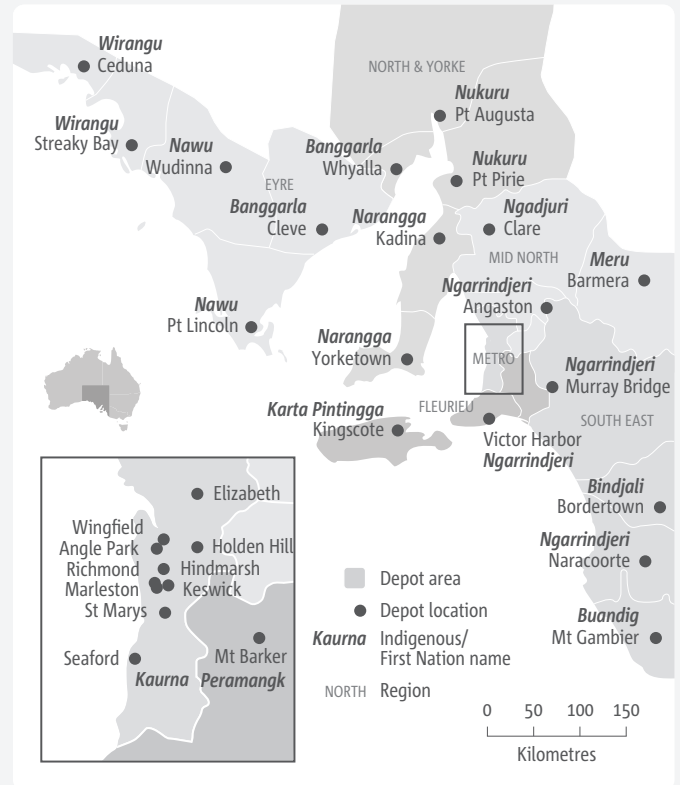
A handwritten signature in blue ink, appearing to read 'Peter Tulloch'.

Acknowledgement of Country

SA Power Networks and Enerven acknowledge the multiple Traditional Owners of the lands that host the South Australian electricity network and their connections to land, sea and community. We pay our respects to all First Nations peoples past and present, acknowledging their deep connection to Country, Culture and Community.

Language Statement

SA Power Networks and Enerven acknowledge the diversity of Aboriginal and Torres Strait Islander people living in South Australia. We have used the term First Nations Peoples to include all Aboriginal and Torres Strait Islander people living in South Australia.



This artwork by Presten Warren, entitled 'Empowering South Australia', will form the visual centrepiece for the very first SA Power Networks and Enerven Reconciliation Action Plan (RAP). which depicts the role SA Power Networks and Enerven have in the community and the reconciliation journey on which we are embarking.

Criteria 1 – Identify the reporting entity

Identification of the reporting entity

This statement has been prepared and published in accordance with the *Modern Slavery Act 2018 (Cth)* (the Act) for the calendar year ended 31 December 2025 (CY25).

It covers the activities of the reporting entity SA Power Networks (ABN 13 332 330 749) and entities owned and controlled by SA Power Networks:

- Utilities Management Pty Ltd (ABN 25 090 664 878)
- Enerven Energy Infrastructure Pty Ltd (ABN 31 621 124 909)
- Enerven Energy Solutions Pty Ltd (ABN 49 621 147 297)
- ETSA Utilities Finance Pty Ltd (ABN 78 091 701 825)
- ETSA FRC Pty Ltd (ABN 85 101 536 412)
- ETSA Ancillary Pty Ltd (ABN 87 101 536 421)

SA Power Networks (ABN 13 332 330 749) is a partnership comprising:

- CKI Utilities Development Ltd (ABN 65 090 718 880)
- PAI Utilities Development Ltd (ABN 82 090 718 951)
- Spark Infrastructure SA (No 1) Pty Ltd (ABN 54 091 142 380)
- Spark Infrastructure SA (No 2) Pty Ltd (ABN 19 091 143 038)
- Spark Infrastructure SA (No 3) Pty Ltd (ABN 50 091 142 362)

All references to our, we and us within this statement refer to SA Power Networks and the entities it controls.



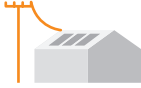







Criteria 2 – Structure, operations and supply chains

Organisational Profile

About the SA Power Networks Group

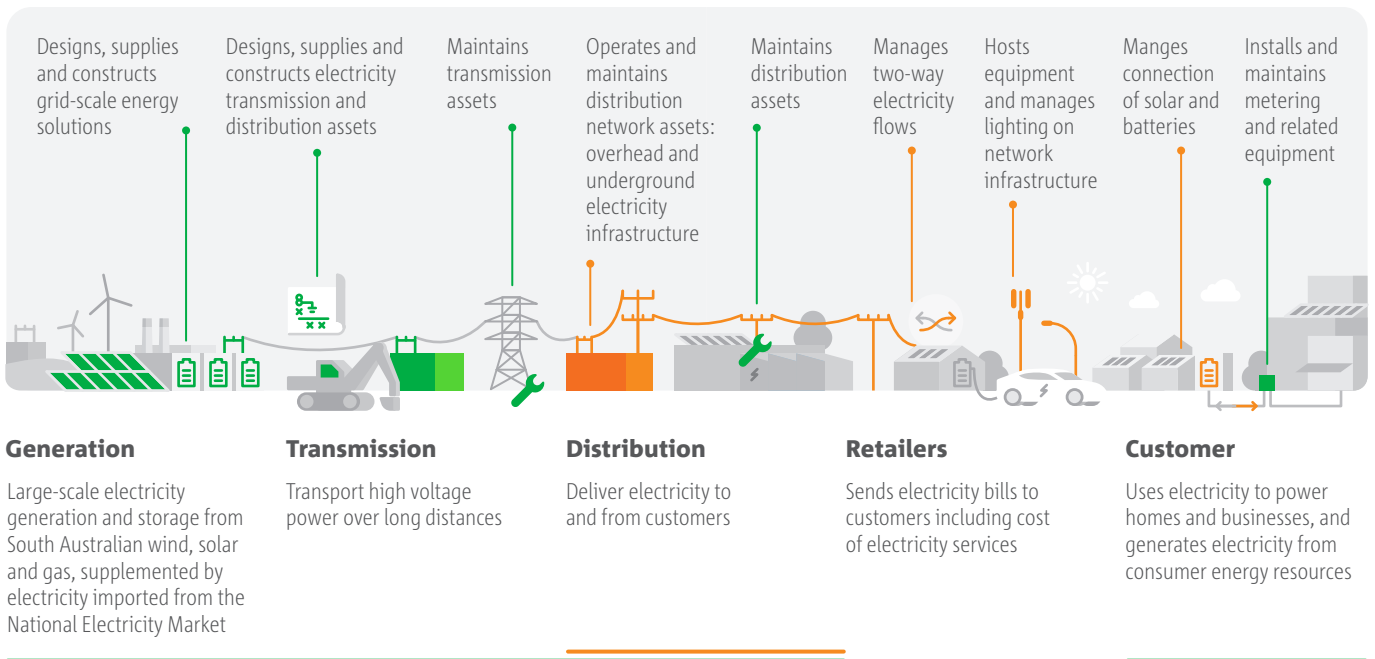
The SA Power Networks Group has two key businesses.

 <p>SA Power Networks manages the regulated electricity distribution network serving over 1.7 million South Australians.</p>			 <p>Enerven is a specialist service provider in the competitive energy and telecommunications sectors.</p>		
 <p>Distributes electricity to and from over 930,000 customers</p>	 <p>Network length of 90,000km, covering over 178,000km²</p>	 <p>415 zone substations 77,000 transformers</p>	 <p>Delivering over 230 projects across 3 states</p>	 <p>715 dedicated staff across 21 sites</p>	 <p>Appointed to design & construct Eraring BESS – set to be southern hemisphere’s largest battery</p>

SA Power Networks distributes electricity to and from over 930,000 South Australian homes and businesses, managing a network length around 90,000km. With many customers generating and storing their own electricity, SA Power Networks now manages a complex system of network infrastructure alongside bi-directional energy flows to and from consumer energy resources, like solar panels and batteries (CER).

Enerven specialises in the design, construction and maintenance of electrical, renewable, and telecommunications infrastructure across Australia. Enerven provides services from utility to residential scale, delivering large-scale renewable energy projects like solar farms and battery energy storage systems (BESS) down to installing public lighting, telecommunications infrastructure and customer metering.

South Australian electricity supply chain and SA Power Networks Group value chain



Operations

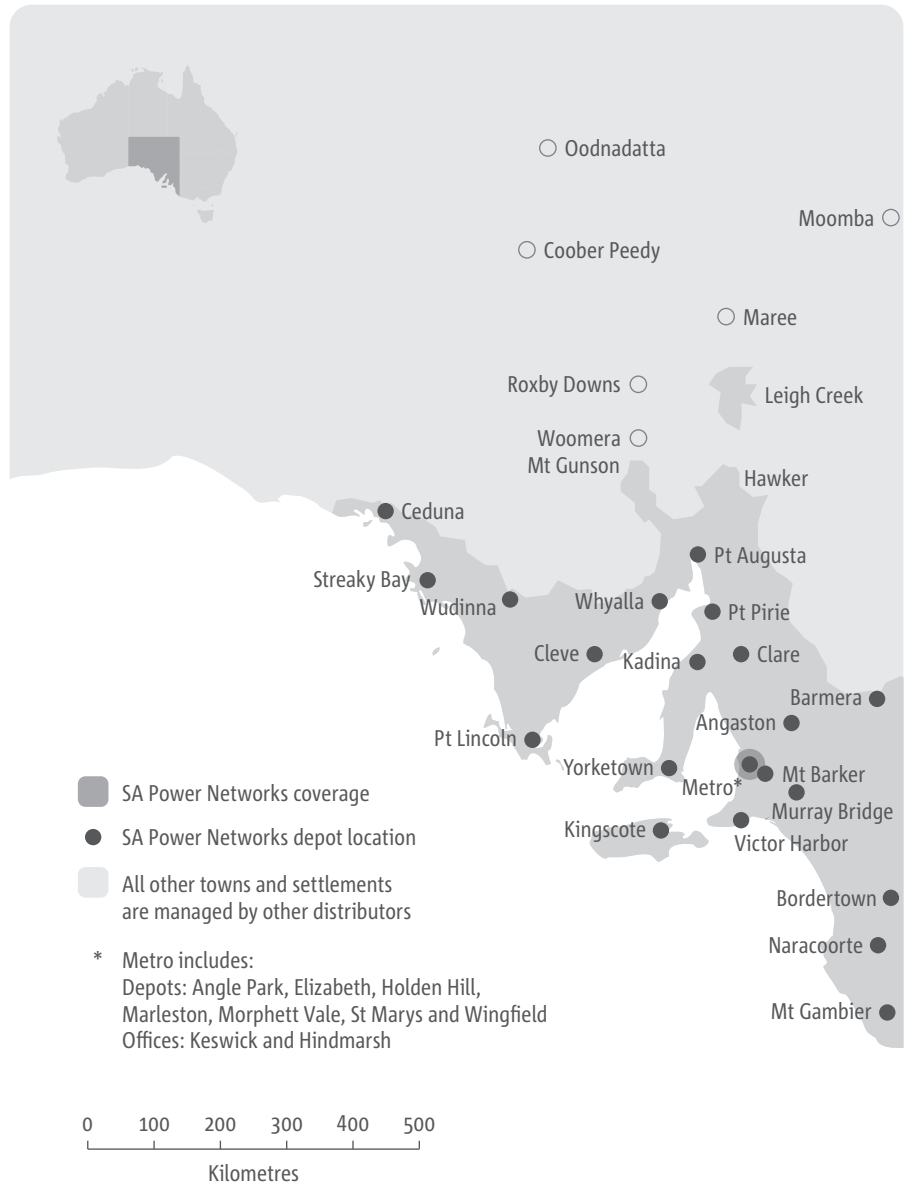
As our network continues to adapt to changing demand patterns and increasing levels of distributed energy resources, we rely on a growing range of technologies central to the energy transition, including solar panels, battery energy storage systems and electric vehicle (EV) charging equipment. These technologies and components frequently come from global supply chains that have documented modern slavery risks, particularly in relation to polysilicon production, battery minerals and electronic components. These emerging dependencies shape our procurement strategies and reinforce the need for deeper transparency across second- and third-tier suppliers. Our priority is to keep the lights on for the people of South Australia.

SA Power Networks operates the low-voltage distribution network throughout South Australia including powerlines, poles, meters, wires and substations.

The electricity distribution network in South Australia covers roughly 178,000km², with a network route length of 90,000km. We supply electricity to approximately 900,000 customers ranging from regional and metropolitan residential homes and businesses to industry precincts and isolated farms in rural areas.

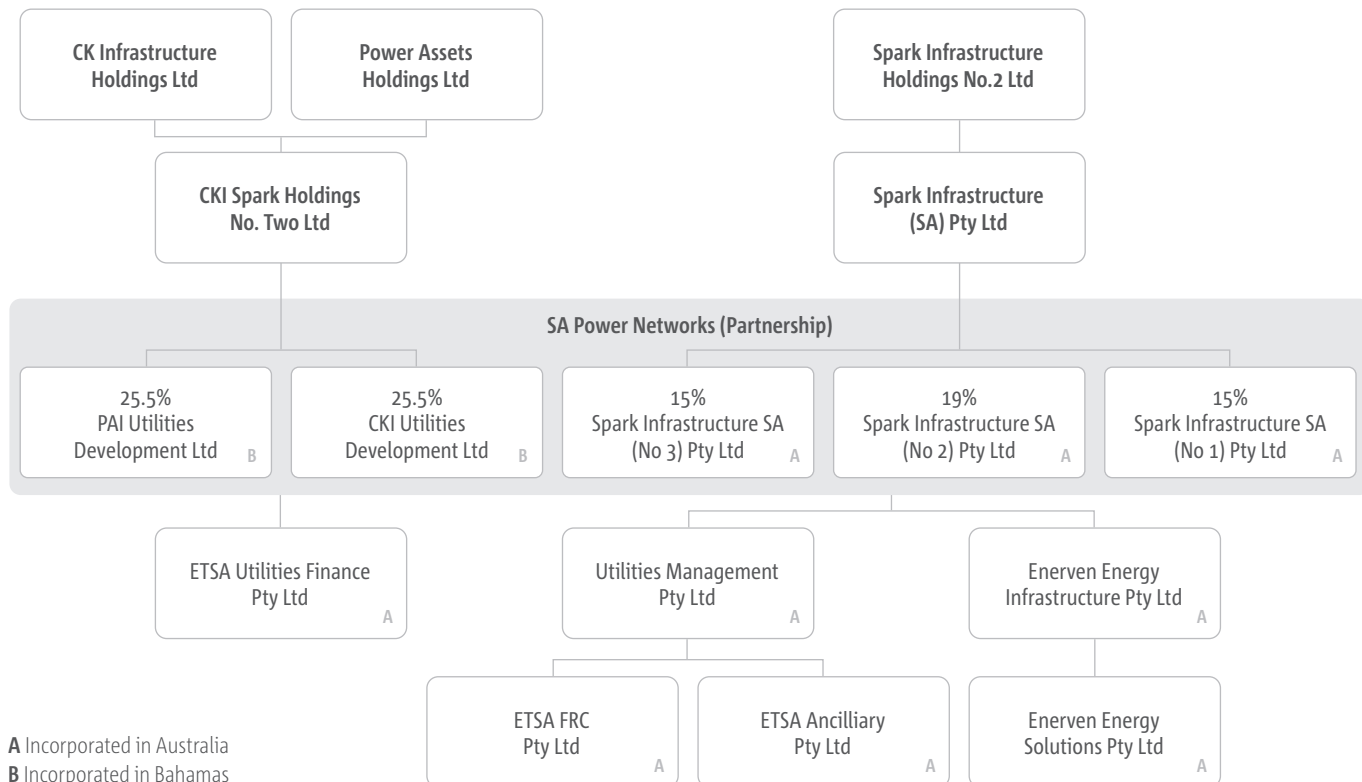
SA Power Networks provides the following services as part of its electrical infrastructure operations:

- Delivery of electricity to residential and commercial users
- Providing emergency response services in case of blackouts
- Repairing street lighting
- Meter reading
- Project management and construction and maintenance services for electrical infrastructure projects
- Research and development activities for emerging energy products and services.

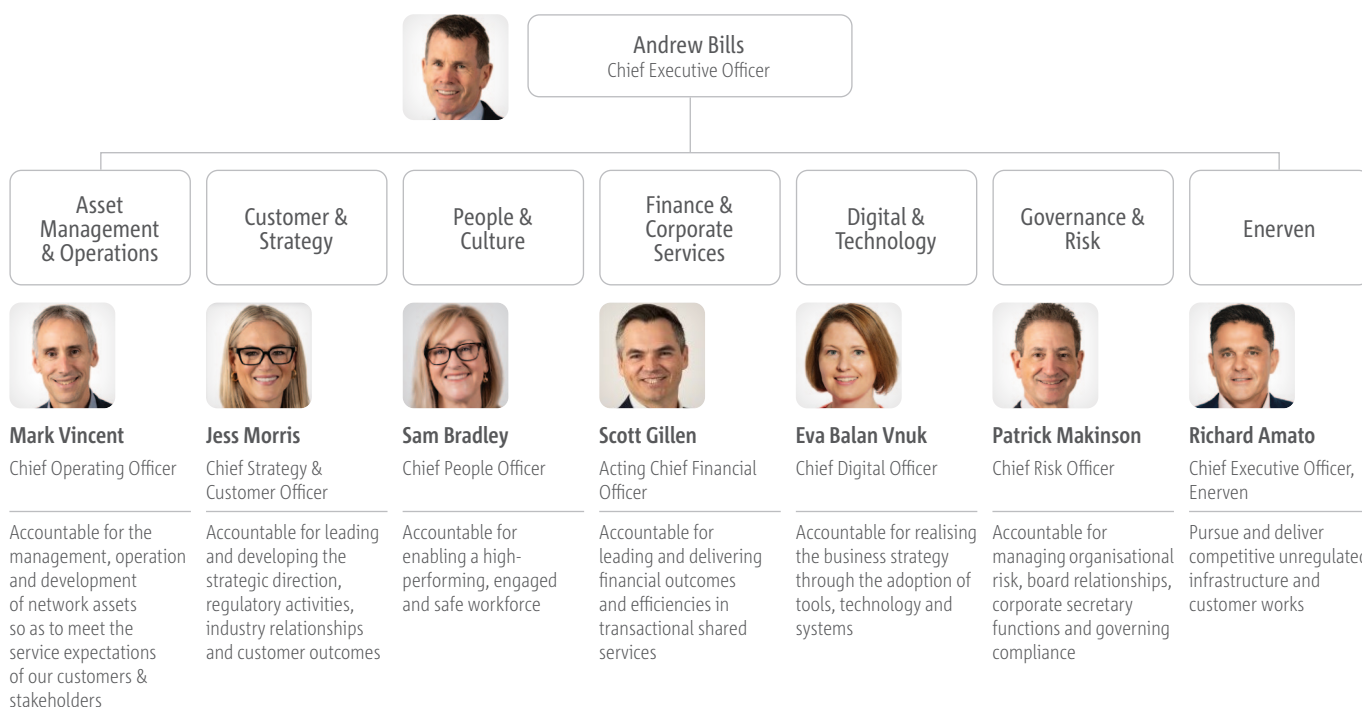


Structure, operations and supply chains

Our Corporate Structure



Organisational Structure



This diagram represents the organisational structure as at February 2026.

Our vision

Connecting South Australians to a better energy future, today.

Our focus

Evolve the core and enable the future

Our value and impact

Customer
Deliver great service to our customers and the community, continuously adapting to their evolving needs

Network
Provide a safe, reliable and resilient network that efficiently supports the decarbonised energy needs of our state

People
Enable an aligned, capable and connected workforce, focused on safely delivering the right outcomes for our customers

Our sustainability priorities

Connecting communities


Transforming energy


Conserving the environment


Enabling our workforce


Our commitments

Energy access and equity
Genuine engagement, respect and reconciliation
Social values

Support an efficient energy transition
Resilience and reliability

Emissions reduction
Circular economy
Nature and biodiversity

Inclusion and diversity
Talent and workforce planning
Health, safety and wellbeing

Integrated governance

Our contribution to the UN Sustainable Development Goals



Sustainable Transition

Progress towards a sustainable transition is at the heart of SA Power Networks Group’s vision: *Connecting South Australians to a better energy future, today.*

South Australia is leading the way in transforming the way it generates, stores and uses electricity. As the energy landscape shifts rapidly, SA Power Networks’ role has too. We’re now orchestrating a dynamic, customer-led energy system.

Beyond our commitment to deliver reliable and safe energy, we recognise our critical role in supporting the state’s decarbonisation agenda. Supporting our customers through this transition is now at the centre of how we’re driving progress on our sustainability commitments.

UN Sustainable Development goals reference the goals detailed on the United Nations Department of Economic and Social Affairs website: [The 17 Goals | Sustainable Development](#)



Structure, operations and supply chains

SA Power Networks Values

It is important that our organisational values align and support our vision. In 2025 we implemented new values which are embedded in our Code of Conduct and our performance management framework.

<p>we keep everyone safe</p> <p>Our first priority, always.</p>	<p>we collaborate collaborate collaborate collaborate collaborate collaborate collaborate collaborate collaborate collaborate</p> <p><i>with purpose</i></p> <p>Working together to achieve great outcomes.</p>	<p>we take the</p> <p>initiative</p> <p>Seeking and acting on opportunities or challenges.</p>	<p>we rise to the</p> <p>challenge challenge challenge challenge challenge challenge challenge challenge</p> <p>Stepping up to meet the needs of our community and teams.</p>
--	---	--	---

Enerven Values

Enerven operates with a set of core values that align closely with the overarching values of SA Power Networks and are underpinned by an unrelenting focus on safety and wellbeing.

Proactive

Collaborative

Dependable

Proactive – we bring people together to pursue possibility. We are quick, versatile and always seeking to make things better.

Collaborative – we always collaborate across our business and with our customers and partners to make the most of our extensive experience and expertise.

Dependable – we understand the significance of being dependable, we demand it of ourselves, our services and processes, and deliver on our promises.

Our people

SA Power Networks Group is one of the largest non-government employers in South Australia, with over 2900 people based throughout South Australia supporting the delivery of our operations.

Our goal is to build a safe and diverse workforce, ready and willing to embrace new capabilities.

As the energy transition accelerates, our people are working in a complex and rapidly changing environment. We are committed to support our people to be safe, well and connected – contributing to the energy transition in ways that are meaningful to them.

Inclusion and diversity

Build an inclusive workplace that better reflects the diversity of our community.

Our Inclusion and Diversity Strategy focuses on three pillars: Gender Equality, Reflecting Our Community, and

Respect. These objectives and workplace behaviours are reinforced by policies including our Code of Conduct, Fair Treatment Directive, HR and Ethics Policy, Health and Wellbeing Framework and Procedure, and inclusive guidelines on family and domestic violence and flexible working. Key activities in 2025 included and Empowered Women in Trades Day, Facilities in the Field Working Group and a Job Design Working Group.

SA Power Networks and Enerven are committed to fostering an inclusive workplace that reflects the diversity of our community. The Inclusion and Diversity (I&D) Committee, formed in 2017, is a volunteer advocacy group representing a broad range of perspectives across gender, culture, tenure, location, and roles. The Committee supports the delivery of our I&D Strategy, which focuses on Gender Equality, Reflecting Our Community, and Respect. It provides guidance on I&D initiatives, raises awareness of the benefits of an inclusive culture, and advises on opportunities to improve workplace practices.

Our inclusion objectives are reinforced through policies including the Code of Conduct, Fair Treatment Directive, HR and Ethics Policy, Health and Wellbeing Framework, and guidelines on family and domestic violence and flexible working. Key activities, such as Empowered Women in Trades Day and targeted working groups, to enable a workplace that is safe, respectful, and equitable, aligning with our broader commitment to ethical and responsible business practices across our supply chain.

Workforce statistics

2025 employees	Total	Women	Men	Other
Total	3131	700	2431	-
Full-time	2997	613	2384	-
Part-time	134	87	47	-
Executive Leadership Team	7	3	4	-

2025 Snapshot of our workforce



22.4%
of our workforce are women



25.7%
of new hires in 2025 were women



4.3% of our workforce are on part time agreements



64.9% women
36.1% men



33.3%
of senior leadership roles (L1–3) are held by women



51 graduates and cadets*
33.3% women **66.6%** men



14.1%
WGEA gender pay gap in FY24/25



217 apprentices*
15.7% women **84.3%** men



1.0%
of our workforce identify as First Nations



18.5%
of our workforce lives in regional SA



43
is our average age

Talent and workforce planning

Build a future-ready workforce that embraces new capabilities and collaborate to strengthen career pathways for South Australians.

Workforce development is critical to addressing skills shortages in the energy sector. The SA Power Networks Group supports a culture of continuous learning, development and performance that starts with our early careers programs and continues for all employees through ongoing training and performance cycles.

In 2025, SA Power Networks delivered 797 training classes, totalling 73,389 hours of facilitator delivered training. 31,452 online courses were completed through our online Learning Management System. We periodically review our curriculum for currency. This year we updated 105 courses, ensuring training is reflective of our current policies and work practices.

Health, Safety and Wellbeing

Our Safety Management System is accredited to ISO 45001, the International Standard for Occupational Health and Safety, and we regularly undertake system, facility and project safety audits and inspections. Our Contractor Management System (Site Pass) also enables us to mandate and monitor appropriate safety and environmental compliance standards across our large contractor base. Our safety incident management system (Enablon) is an integrated Risk, Environment, Health and Safety Management system that has facilitated improved event reporting, investigation and management.

As required by law, our focus on and approach to safety goes beyond our employees, encompassing our contractors and customers, with a key emphasis on safety related to bushfires, electric shocks and asset management practices that contribute to public safety. All contractors and other workers are required to meet stringent work, health and safety requirements and be trained or inducted prior to working on and around our infrastructure.

To support the safety of our customers and communities, we:

- Proactively address bushfire, electric shock, wires down and life support risks
- Maintain our assets to minimise risk of asset failure especially in the face of intense and prolonged summer heatwaves brought on by climate change
- Provide safety information that is relevant, timely and easily accessible via safety campaigns, social media, website updates and two-way communication with customers
- Maintain a timely response to community concerns raised through SA Power Networks' 24/7 faults and emergencies line.

SA Power Networks and Enerven continue to invest in their people by building capability, supporting wellbeing and fostering a strong safety culture. New organisational values, shaped by more than 180 employees, guide how work is performed, with a clear focus on keeping everyone safe. In 2025, this commitment was reinforced through the implementation of the Fatal Hazard Critical Controls program, ensuring employees understand the most significant safety risks and how harm can be prevented. Through shared values, adaptability and collaboration, the organisation is building a resilient, safety-focused culture to support the energy transition and a sustainable future.

Contractor safety remains a key priority. SA Power Networks and Enerven manage safety and environmental compliance across their contractor base through a robust contractor management system, Sitepass, which enables mandated and monitored compliance. Safety leadership is strengthened through regular engagement, including field assurance activities, contractor forums and ongoing communications. By collaborating with contractors to understand field-based risks, share lessons learned and continuously improve controls, the organisations promote a culture of shared responsibility that prioritises the safety of workers, contractors and the communities they serve.

Our safety performance in 2025

	Unit	2025 Targets	2025 Results
Work-related fatalities	#	0	0
Total reportable injury frequency rate (TRIFR)	Rate	≤9	9.6
SSIFR (Serious Safety Incident Frequency Rate)	#	<3	0.3
Workers covered by an OH&S system	%	100%	100%

Further detail on the sections 2025 can be found in our 2025 ESG Impact Statement.

Structure, operations and supply chains

Supply Chain Overview

Responsible Supply Chain at SA Power Networks

Responsible Supply Chain Approach

SA Power Networks and Enerven recognise that a responsible supply chain is essential to operating safely, ethically, and sustainably. It aligns with our organisational values, regulatory obligations, and commitment to respecting human rights while preventing modern slavery across our operations and supply networks.

In 2025, SA Power Networks continued to strengthen its Responsible Supply Chain framework, embedding clearer supplier expectations, improving internal awareness of modern slavery risks, and enhancing risk identification, assessment, and management processes. This targeted, risk-based approach focuses on high-risk categories such as Networks Materials, Digital & Technology, and Corporate Materials and Services, where supply chains are more complex. By engaging with suppliers, industry peers, and stakeholders, we aim to drive responsible practices, support supplier improvements, and contribute to broader efforts to address modern slavery.

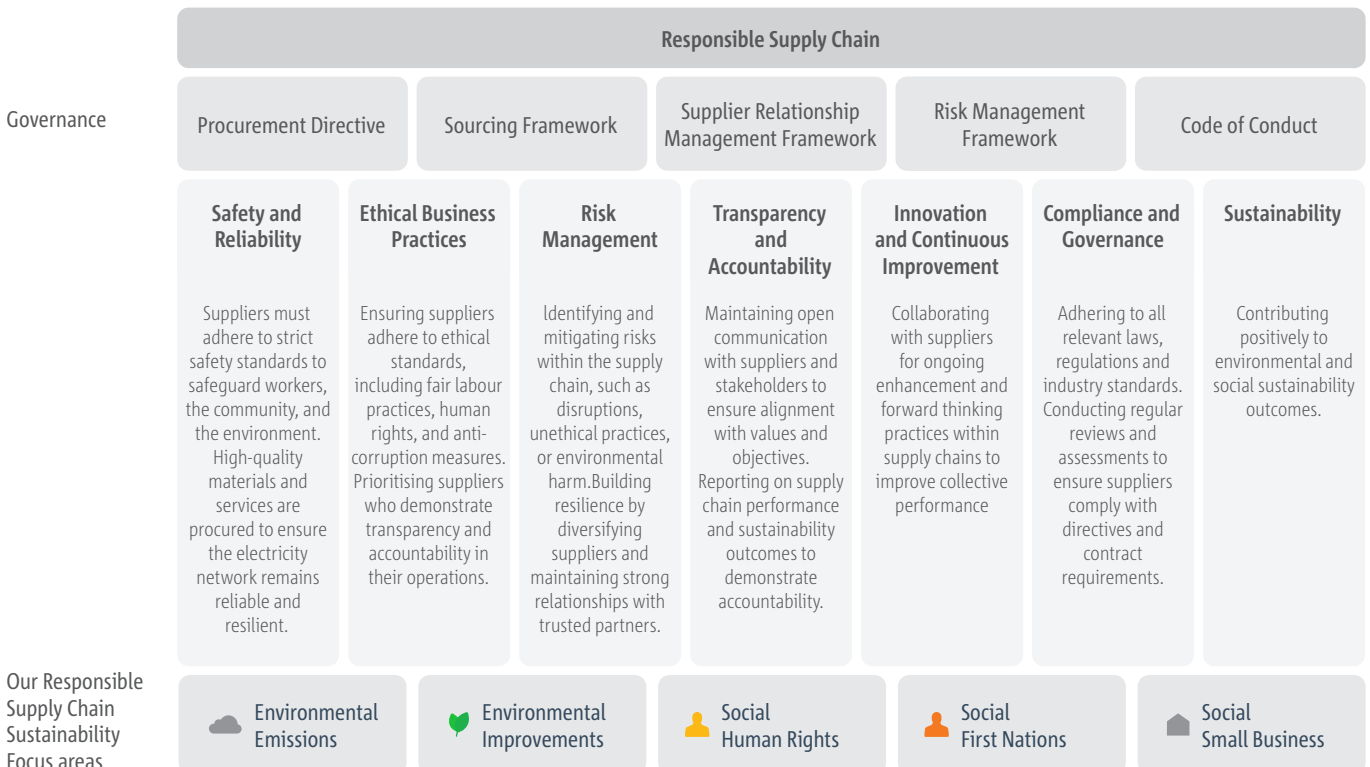
Enerven’s supply chain approach reflects its commitment to ethical business practices and human rights. With supply chains spanning materials, equipment, subcontracted services, and technical capabilities, Enerven applies a proportionate, risk-based approach to managing modern slavery risks, particularly in labour-intensive, subcontracting, and offshore manufacturing contexts. Actions are guided by Sustainable Procurement principles and aligned with SA Power Networks Group policies, embedding ethical conduct expectations, responsible labour practices, and supplier engagement into procurement governance and operations.

Both SA Power Networks and Enerven are committed to continuous improvement, leveraging supplier interactions, internal reviews, and industry collaboration to positively influence supply chain behaviour, support ethical working conditions, and contribute to broader efforts to prevent modern slavery while maintaining high standards of safety, quality, and service delivery.

Responsible Supply Chain Considerations

Our Responsible Supply Chain framework is continually evolving as we advance the integration of sustainability into our supply chain operations. We recognise the importance of balancing sustainability with other key supply chain considerations to create a comprehensive and integrated approach to responsible supply chain management for our organisation. This approach integrates reviewing the risks of modern slavery within our supply chain.

Responsible Supply Chain Framework



Our Supply Chains in 2025

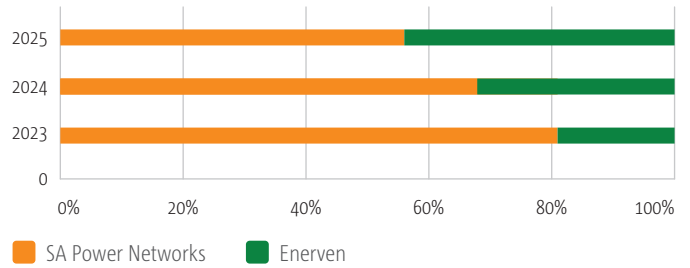
In 2025, SA Power Networks and Enerven engaged a total of 1,661 suppliers, representing an increase of 129 suppliers compared to 2024. Of our total supply chain expenditure, 98% was directed to entities located within Australia. We remain acutely aware that the risk of modern slavery exists deeper within our supply chain, and page 22 outlines the actions we undertook in 2025 to address these risks.

This Supply Chain Snapshot for the SA Power Networks Group highlights key metrics across the organisation.

It is important to note that the metrics regarding the location of our suppliers reflect the location of the organisations we engaged to provide goods or services. These metrics do not necessarily represent the country of origin of the goods or services supplied.

Comparison of supply chain (by expenditure)

The ongoing growth of Enerven is having a significant impact on our supply chain, with the proportion of expenditure attributed to Enerven steadily increasing. Enerven now accounts for 44% of our total supplier expenditure.



SA Power Networks Group 2025 Supply Chain Snapshot



1661

Total number of suppliers engaged in 2025



98%

Expenditure with entities located in Australia



42.6%

Expenditure with entities located in South Australia



36.3%

Expenditure with entities located in New South Wales



939

Number of Australian small businesses engaged in 2025



0.67%

Expenditure with First nations suppliers

SA Power Networks Supply Chain Summary

The supply chain for the regulated arm of our business, SA Power Networks, remains supported by a stable group of critical and strategic suppliers. These suppliers provide the

essential materials, services, and digital technologies that underpin our operations and projects. In 2025, we observed a significant increase in engagement with small businesses, rising from 616 in 2024 to 704 in 2025.



1251

Total number of suppliers engaged in 2025



97%

Expenditure with entities located in Australia



49%

Expenditure with entities located in South Australia



27%

Expenditure with entities located in New South Wales



704

Number of Australian small businesses engaged in 2024



0.02%

Expenditure with First Nations suppliers

	Services	Materials	Digital technology	Corporate materials and services	Miscellaneous / other
Suppliers engaged	198	159	160	666	56
Location of suppliers – first tier	Australia, New Zealand	Australia, Malaysia	Australia, Canada, Germany, Hong Kong, Ireland, New Zealand, United Kingdom, United States	Australia	Australia, Bahamas, Canada, Chile, India, Ireland, New Zealand, United Kingdom, United States
South Australian suppliers	163	67	37	480	34
New South Wales suppliers	9	38	56	72	13
Small business	149	81	80	368	24

Enerven Supply Chain Summary

Enerven engaged with 710 suppliers in 2025, an increase from 601 suppliers in 2024. During 2025 Enerven increased its engagement with First Nations entities.



710

Total number of suppliers engaged in 2025



99.75%

Expenditure with entities located in Australia



34%

Expenditure with entities located in South Australia



48%

Expenditure with entities located in New South Wales



389

Number of Australian small businesses engaged in 2024



1.49%

Expenditure with First Nations suppliers

	Services	Materials	Digital technology	Corporate materials and services	Miscellaneous / other
Suppliers engaged	227	118	10	333	22
Location of suppliers – first tier	Australia	Australia, New Zealand, South Korea	Australia	Australia	Australia, Chile, New Zealand, United States
South Australian suppliers	139	36	2	194	11
NSW suppliers	48	42	4 (QLD –4)	75	3
Small business	139	56	5	180	9



200

TYREC
DO NOT
STRAP ACROSS
FIN WALLS

TYREC
DO NOT
STRAP ACROSS
FIN WALLS



L.V. INSULATION

WARNING
PINCH POINT

L.V.

2085007

Criteria 3 – The risks of modern slavery practices in the operations and supply chains

SA Power Networks' response to this criterion remains consistent with previous Statements. Our Risk Appetite Statement, endorsed by the Board, sets out the organisation's overarching principles on risk taking, mitigation, and avoidance.

The Board maintains a zero-tolerance approach to any operations that may negatively impact sites of Indigenous or cultural significance, or that may result in a 'human cost'—including any form of modern slavery.

Risk of modern slavery in our operations

SA Power Networks and Enerven staff are all engaged under either an Enterprise Agreement (Utilities Management Pty Ltd Enterprise Agreement 2024) or an Individual Employment Agreement which govern the employment relationship.

These employment arrangements are then supported by a range of Directives and Codes which establish how we work.

- Code of Conduct (updated in 2025)
- Fair Treatment Directive
- HR and Ethics Policy
- Whistleblower Directive and Whistleblower Hotline
- Employee Assistance Programme
- Family and Domestic Violence Support Directive
- Respect at Work Directive

The culture of the organisation impacts how we work under the governing arrangements discussed above. During 2025 SA Power Networks and Enerven launched new values which embed the expectation of how we work.

As noted in previous statements, our operations, which are in our direct control have adequate measures, supported by a workplace culture which prevents modern slavery occurring.

Risk of modern slavery in our supply chain

Our approach to managing the risk of modern slavery within our supply chain continues to evolve, reflecting our increasing understanding of the risks and the areas requiring focused attention.

To mitigate the risk of modern slavery within our supply chains, we have established controls and expectations for our suppliers. In addition to contract arrangements with suppliers, this includes:

- The Code of Conduct
- Procurement Directive
- Evaluation Guidelines
- Sustainable Procurement Statement

The governing documents are supported by our ongoing engagement with the Energy Procurement and Supply Association consortium that used the Informed 365 tool for supplier risk assessments. Continued development and improvement in this tool improves visibility and accuracy of these risk assessments. These risk assessments are a valuable resource to inform our procurement and supplier management processes.

Every tender released to the market outlines our compliance requirements under the Act and sets clear expectations for suppliers to meet these standards. Tenderers must provide detailed information about their business practices in relation to modern slavery.

We continue to deepen our understanding of our second and third tier suppliers, with a particular focus on materials suppliers. Data gathered across these suppliers supports more informed conversations with our partners and complements the information obtained through self-assessment questionnaires.

The risks of modern slavery practices in the operations and supply chains

Supply Chain Category Risks



Materials category

Our materials suppliers continue to be Australian based (first tier), with a small number of suppliers located outside Australia. Considerable progress has been made through improved supply chain mapping, enabling better visibility of second- and third-tier manufacturing locations to support both supply chain management and modern slavery risk identification.

Our risk in this category continues to be the sourcing and manufacture of components overseas. The chart on page 23 outlines the geographic locations of key manufacturing facilities, allowing more informed conversations with suppliers through our procurement and supplier management processes, about their risk-management practices. We have introduced a scorecard process for several materials suppliers, which includes completion of the modern slavery self-assessment questionnaire.



Direct Services category

The Direct Services supply category primarily involves delivery of services which relates directly to the distribution network within South Australia or to delivery of projects across South Australia and New South Wales.

These services are predominantly provided by locally based, construction-focused suppliers. Australia, and South Australia in particular, has strong legislative protections and a well-established focus on workers' rights, reducing exposure to modern slavery risks compared to higher-risk regions. The South Australian construction industry operates within a robust regulatory framework, including labour laws governing wages, working conditions, and subcontracting arrangements, supported by union representation, licensing requirements, and regular workplace inspections. While these factors contribute to a lower overall risk profile, they do not eliminate the possibility of modern slavery occurring.

Residual modern slavery risk within this category is most likely to arise through subcontracting arrangements and the engagement of low-skilled labour. Ongoing supplier engagement and increased awareness of labour practices are key to managing this risk. Risk mitigation measures may include requiring suppliers to seek approval before engaging subcontractors and to provide transparency regarding the number and nature of subcontractors used.



Digital Technology category

The Digital Technology category consists of Australian-based first-tier suppliers, with other suppliers located in Canada, Hong Kong, Europe, New Zealand, the United States and the United Kingdom. Across the first-tier supply base, goods and services are sourced globally through complex supply chains. Consistent with previous years, the key risk relates to the manufacture of IT hardware, which is produced by large multinational organisations with extensive global operations.

Engagement with a wide range of IT suppliers during the year has enhanced understanding of their modern slavery frameworks and has allowed SA Power Networks to clearly communicate our expectations. We had two IT suppliers present to our Procurement and Shared Services Team on sustainability, including how they address the modern slavery risk in their supply chain.



Indirect Goods and Services Category

This category has the largest supplier base, with 850 suppliers providing goods and services ranging from waste management and recycling through to printing, fuel and travel services. With many suppliers the focus remains on those that have an elevated risk, including facilities services.



Other / Miscellaneous Category

This category comprises suppliers of assorted services which are not addressable from a procurement perspective (i.e. we do not facilitate procurement processes for the selection of these suppliers), including some utility and local and state government providers. Given the nature of these suppliers and services, the overall risk in this category remains low.

Enerven

Enerven is supporting the renewable energy transition, ensuring grid reliability and resilience through large-scale utility builds, maintenance services, and renewable infrastructure solutions that are vital for a sustainable and interconnected future.

As a major Australian installer and integrator of battery energy storage systems, substations, and electrical infrastructure, Enerven relies on complex global supply chains for critical equipment and components. The risks associated with solar and battery manufacturing particularly in regions such as China have direct implications for our obligations under the Act and our commitment to responsible procurement. These risks ranging from forced labour concerns in upstream raw material production to supply-chain capacity, and rapid consolidation reinforce the need for Enerven to undertake thorough due diligence and verify ethical practices across the supply chain. There is also acknowledgement of the work being undertaken by the Office of the Anti-Slavery Commissioner in relation to the Renewables Code of Practice Discussion Paper, which further highlight the risks within the industry.

Key Impacts and Obligations

1. Heightened Due Diligence Requirements

Parts of the solar and battery supply chain in China have been linked to modern slavery risks including forced labour, debt bondage, and poor labour conditions. Australian importers face increased expectations to undertake deeper and more frequent due diligence. This includes:

- Mapping suppliers beyond Tier 1 to identify higher-risk regions or manufacturing stages.
- Conducting detailed risk assessments for both established and prospective suppliers.

2. Increased Need for Transparency and Traceability

The complexity and geographic concentration of Chinese supply chains can limit visibility. For an importer, this raises the risk of inadvertently sourcing products that are linked to unethical labour practices. As a result, there is a need to:

- Obtain verifiable documentation on the origin of raw materials (e.g., polysilicon and lithium).
- Seek independent assurance where transparency is low.
- Require suppliers to demonstrate compliance with international labour standards.

3. Greater Reputational, Legal and Commercial Exposure

If modern slavery risks materialise in the imported supply chain, Australian entities may face:

- Non-compliance with the Act and associated regulatory scrutiny.
- Reputational damage among customers, business partners, and the wider community.
- Contractual and commercial consequences, including delays or cost increases if suppliers are later deemed unacceptable.

4. Ethical Procurement Expectations from Customers and Stakeholders

Utilities, government agencies, and large corporate clients increasingly require evidence of strong ethical sourcing. Importers must therefore:

- Demonstrate proactive measures to mitigate modern slavery risk.
- Provide documented assurance of supply-chain integrity.
- Show continuous improvement in practices such as audits, training, and supplier engagement

Enerven's Risk Response: Factory Audits
Recognising these risks and obligations, Enerven has strengthened its approach to ethical sourcing and modern slavery risk management.

To review and assure ourselves that Enerven's supply chain is free from unacceptable labour practices, Enerven commenced targeted factory audits in 2025, guided by the risks outlined in this Modern Slavery Statement. These audits focus on evaluating:

- Labour conditions and worker welfare
- Employment practices, including hiring, contracts, and grievance mechanisms
- Manufacturing site governance and management oversight
- Traceability of raw materials
- Alignment with SA Power Networks and Enerven Code of Conduct.

During 2025, Enerven conducted six factory audits across key Chinese manufacturing partners. These visits have improved understanding of on-the-ground conditions, strengthened supplier relationships, and enabled the identification and remediation of potential risks.

Enerven procurement team also must conduct the annual CIPS Ethics test covering Modern Slavery risks and are governed by the same governance framework that applies to SA Power Networks.

Criteria 4 – Actions towards addressing the risk of modern slavery in our supply chain

Key actions towards addressing the risk of modern slavery in our supply chain in 2025 can be seen below.

SA Power Networks continue to align our actions with the objectives of the Act while evolving and enhancing our approach to Responsible Supply Chain.

- 1 **Raising awareness** – Within Procurement, across the organisation and with our suppliers.
 - 2 **Identify, report and address the risks** – Self-assessment questionnaires, supply chain understanding and monitoring, engagement with suppliers.
- Due diligence. Our Enerven team conducted six targeted factory audits across key manufacturing partners.
 - We continued to evolve and enhance our approach to our Responsible Supply Chain ensuring the modern slavery was integrated as part of our integrated approach across our procurement and supplier management activities.
 - We continued to run bi-monthly “Sustainability in Procurement” with presentations from two IT suppliers sharing how they manage modern slavery risks.
 - Continued focus on improving our understanding of our second/third tier suppliers for our materials suppliers.

Due Diligence

To review and assure ourselves that Enerven’s supply chain is free from unacceptable labour practices, Enerven commenced targeted factory audits in 2025, guided by the risks outlined in its Modern Slavery Statement.

These audits focus on evaluating:

- Labour conditions and worker welfare
- Employment practices, including hiring, contracts, and grievance mechanisms
- Manufacturing site governance and management oversight
- Traceability of raw materials
- Alignment with SA Power Network and Enerven’s Supplier Code of Conduct

During 2025, Enerven conducted six factory audits across key Chinese manufacturing partners.

These visits have improved understanding of on-the-ground conditions, strengthened supplier relationships, and remediation of supply chain potential risks.

Sustainability in Procurement

Our bi-monthly Sustainability in Procurement sessions continue to play a vital role in raising awareness of modern slavery risks. Each category team presented the actions taken with their suppliers, as well as the outcomes achieved. These sessions highlighted examples of good practice within our supply chain, provided practical learnings for our teams, and strengthened our collective capability to engage more effectively with suppliers on modern slavery risks.

Key highlights included:

- A deep dive into how some of the major IT Original Equipment Manufacturers assess and manage modern slavery risks across their operations and supply chain.
- Insights from our Facilities supplier, outlining their approach to modern slavery risk identification and responsible sourcing.
- A guest session from Flinders University (Adelaide), led by Professor Marinella Marmo, who provided an in-depth overview of modern slavery, insights into global issues, and a spotlight on modern slavery in Australia, including practical actions organisations can take to support and address the risk.

These sessions provided valuable insights through shared experiences and continued to build internal knowledge on how modern slavery risks can be mitigated within our supply chain. Their impact was recognised externally, with SA Power Networks named a finalist in the CIPS Awards for Best Collaborative Teamwork Project.

Including Modern Slavery into Strategic Category Plans and Supplier Relationships

Each Procurement team develops Strategic Category Plans tailored to its specific area of responsibility. These plans play a key role in identifying supply chain risks, including those related to modern slavery. The plans are reviewed regularly throughout the year to provide a consistent and up-to-date assessment approach.

For suppliers identified as having a strategic relationship with SA Power Networks, supply chain risks are explored in greater depth through collaborative engagement. This process supports shared understanding and enables both parties to identify and implement appropriate risk-mitigation actions.

Raising awareness – CIPS Membership Human Rights Champion award

Our Procurement Team again completed the CIPS Ethical Procurement and Supply eLearning module to achieve the Human Rights Champion award. This is an important annual assessment for our team to maintain knowledge that is up to date, and new starters are also trained to the appropriate standard.



Identify, report and address the risk – supply chain mapping

SA Power Networks continue to develop robust systems including using Power BI to gather data to plot the location of our second and third tier suppliers, giving us better information on the origin of supply.

The Procurement teams also develop Quarterly Risk Insight reports that focus on global macro-economic factors that influence the existing supply base. These Insight Reports also outline the Modern Slavery risk rating relevant to the country of origin. The reports are shared on the

internal hub providing access to all key stakeholders.

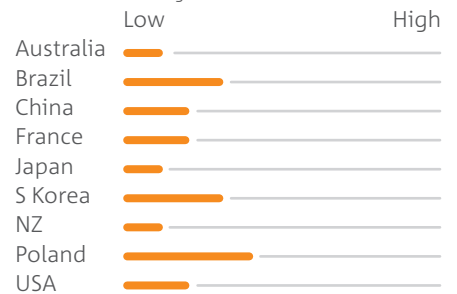
This essential information:

- Supports us to identify risks
- Improve the quality of conversations with our suppliers to manage the risk
- Improves the understanding of our wider organisation of the origin of goods/services supplied to us.

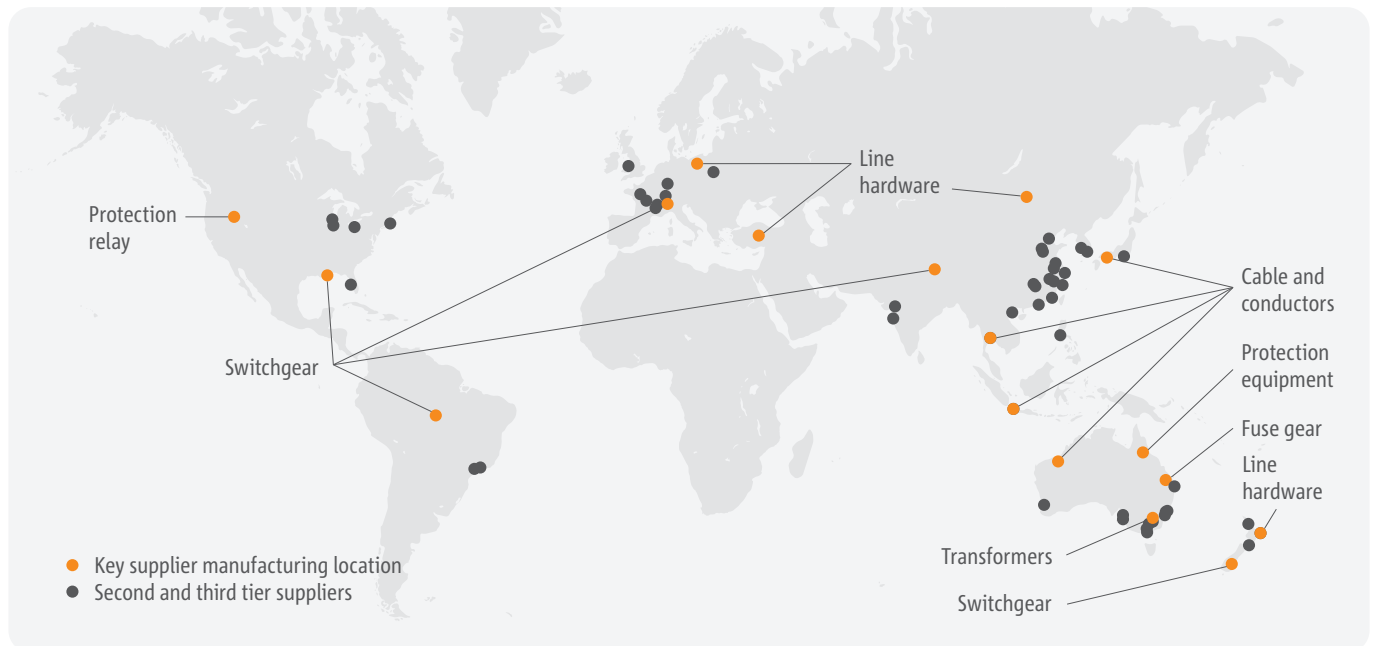
The map below depicts the various locations of our second and third tier suppliers for our materials.

Modern Slavery Risk Rating

Source: walkfree.org



Key supplier manufacturing locations and second- and third- tier supplier locations



Criteria 5 – Effectiveness assessment

The key actions outlined in SA Power Networks' 2025 Modern Slavery Statement that contributed to the effectiveness assessment of its actions are summarised below:

1. Due Diligence and Risk Mitigation

Factory Audits – Enerven conducted six targeted factory audits across key Chinese manufacturing partners in 2025. These audits evaluated labour conditions, worker welfare, employment practices, governance, traceability of raw materials, and alignment with SA Power Networks' Supplier Code of Conduct. These audits extensively addressed modern slavery risks with these suppliers.

Supply Chain Mapping – SA Power Networks used Power BI to map second- and third-tier suppliers, improving visibility of supply chain origins and enabling better risk identification and management.

Quarterly Risk Insight Reports – Procurement teams developed reports outlining global macroeconomic factors and modern slavery risk ratings for countries of origin, supporting informed supplier conversations and risk mitigation.

2. Raising Awareness

Sustainability in Procurement Sessions – Bi-monthly sessions were held to share insights and best practices on modern slavery risk management. Highlights included presentations from IT suppliers, facilities suppliers, and a guest session from Flinders University on modern slavery risks and practical actions.

Supplier Engagement – Regular discussions with suppliers included modern slavery self-assessment questionnaires as part of scorecard evaluations, fostering awareness and accountability.

CIPS Ethical Procurement Training – Procurement staff completed the CIPS Ethical Procurement and Supply eLearning module, achieving the Human Rights Champion award, ensuring ongoing awareness and training for staff involved in supplier selection.

3. Collaboration and Industry Engagement

Energy Procurement and Supply Association (EPSA) – SA Power Networks participated in EPSA's Modern Slavery Working Group, monthly Hot Topics discussions, and annual conferences, leveraging industry knowledge and subject matter expertise.

Memberships – Continued engagement with the Chartered Institute of Procurement and Supply (CIPS) and the World Commerce and Contracting Association (WCC) provided access to collaboration, learning opportunities, and best practices.

4. Integration into Procurement Processes

Strategic Category Plans – Procurement teams developed and regularly reviewed Strategic Category Plans to identify and address supply chain risks, including modern slavery.

Supplier Expectations – Clear compliance requirements under the Act were outlined in tenders, requiring suppliers to provide detailed information on their business practices related to modern slavery.

5. Internal Knowledge Sharing

Internal Communication – Supply chain information, including risk insights and supplier mapping data, was shared across the organisation to improve understanding and awareness of modern slavery risks.

Scorecard Process – Modern slavery self-assessment questionnaires were integrated into supplier evaluations to support compliance and accountability.

Effectiveness Assessment Outcomes

Reduced Modern Slavery Risk – Factory audits, supply chain mapping, and risk insight reports contributed to identifying and mitigating risks, particularly with high-risk suppliers.

Increased Awareness – Regular supplier engagement, training, and internal knowledge sharing improved awareness of modern slavery risks across the organisation and supply chain.

Recognition – SA Power Networks was named a finalist in the CIPS Awards for Best Collaborative Teamwork Project, highlighting the impact of its efforts in addressing modern slavery risks.

These actions demonstrate SA Power Networks' commitment to reducing modern slavery risks, increasing awareness, and fostering collaboration to support ethical practices across its operations and supply chains.

Criteria 6 – Consultation

Consultation was undertaken through our Sustainability Committee and at the Board level through consideration and approval of this statement by both the SA Power Networks and Enerven Boards.

The preparation and review of this Statement prior to Board consultation was supported by various teams throughout the organisation.



Energy Procurement and Supply Association (EPSA)

We are a member of EPSA which consists of supply chain and procurement managers from utility companies operating in the Asia Pacific region. SA Power Networks have two employees on the Management Committee

In 2025 EPSA:

- Continued monthly Hot Topics with Modern Slavery being one of the topics covered during the year.
- Continued collaboration opportunities through the annual conference.
- Continued the Modern Slavery Working Group. This group who meet regularly are mostly members of the consortium that use the Informed 365 tool for conducting supplier self-assessments. This consortium continues to facilitate access to subject matter experts and industry knowledge that is valuable.



Chartered Institute of Procurement and Supply (CIPS)

We continue to be a member of the Chartered Institute of Procurement and Supply which helps support our links to the procurement and supply chain community within Australia and New Zealand.



World Commerce and Contracting Association

In 2025, SA Power Networks continued our engagement and collaboration a member of the World Commerce and Contracting association (WCC).

Criteria 7 – **Other relevant information**

The SA Power Networks Group Modern Slavery Statement was approved by the Board of SA Power Networks on 25 February 2026 and the Board of Enerven on 5 February 2026.

The Statement has been signed by:

- Andrew Bills as the Chief Executive Officer of SA Power Networks and as a member of the Enerven Board.
- Peter Tulloch as the Chairman of the SA Power Networks Board.



1010145

1010134



-  [sapowernetworks](#)
-  [sapowernetworks](#)
-  [sa-power-networks](#)
-  [sapowernetworks](#)
-  [sa_powernetworks](#)

SA Power Networks
13 12 61
1 Anzac Highway, Keswick SA 5035
[sapowernetworks.com.au](#)

- [Enerven](#) 
- [EnervenAU](#) 
- [enerven](#) 
- [Enerven AU](#) 

Enerven
1300 334 523
1 Station Place, Hindmarsh SA 5007
[enerven.com.au](#)

