



synergy)

2021

MODERN SLAVERY
STATEMENT

About this Statement

This statement has been prepared by the Electricity Generation and Retail Corporation, trading as Synergy (ABN 58 673 830 106), at its registered office address of 219 St Georges Terrace, Perth Western Australia, to meet the requirements of the Modern Slavery Act 2018 (Cth).¹

The statement covers the financial year ending 30 June 2021 (Reporting Period).

This statement has been prepared collaboratively by Synergy's modern slavery working group. Synergy's wholly owned subsidiary, South West Solar Development Holdings Pty Ltd (ACN 152 749 936) (SWSDH) and its subsidiary Synergy Renewable Energy Developments Pty Ltd (ACN 152 752 719) (SynergyRED) have been consulted in relation to modern slavery risks in its operations and supply chains.²

The statement was approved by Synergy's board on 30 November 2021.³



Robert Cole
Chair

1 Mandatory criteria outlined in section 16(1)(a) of the *Modern Slavery Act 2018*

2 Mandatory criteria outlined in section 16(1)(f) of the *Modern Slavery Act 2018*

3 Approved in accordance with section 13(2)(c) of the *Modern Slavery Act 2018*



Synergy ABN 58 673 830 106
GPO Box F366, Perth WA 6841
www.synergy.net.au
E: vendor.support@synergy.net.au

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Acknowledgement of Country

We acknowledge the Traditional Owners of the Land on which we operate and their continuing connection to the land, water and community. We pay our respects to Aboriginal and Torres Strait Islander communities, their cultures and to Elders past and present.





A message from our CEO

It is with pleasure that I present Synergy’s second modern slavery statement.

The past year has been significant for our business and the Western Australian energy sector. Our new corporate strategy sets out how we will develop a sustainable ‘new’ Synergy that helps our customers navigate Western Australia’s evolving energy landscape.

While our strategy outlines what we want to achieve, our values will guide how we do it. We understand that our work on sustainability and social responsibility extends beyond our Western Australian border and our values of innovation, accountability, trust and collaboration must guide our actions and behaviours as we move forward on this next phase of our modern slavery journey.

In financial year 2019-20 we completed an initial modern slavery risk assessment, established both internal and external collaborative groups and got to work building our knowledge on the steps required to identify, assess and eliminate the risks of modern slavery related to our business.

During the financial year 2020-21 Synergy engaged externally with expert consultants to review our initial work and assist us in developing our two-year modern slavery action plan. This plan, which looks at strengthening our governance framework, training program and procurement processes, is a positive step forward in developing our maturity to address modern slavery.

This statement outlines our progress made over the 2020-21 financial year and looks ahead to discuss how we will continue to grow our knowledge and capability in managing modern slavery risks into the future.

Synergy is proud to release our second Modern Slavery statement.

Jason Waters
CEO

Key Achievements



01 Planning

Engaged expert consultants to review our progress
Two-year modern slavery strategy and action plan developed

02 Risk Assessment

Expanded supplier self-assessment questionnaire (SAQ) rollout
Developed SAQ assessment guidelines

03 Governance

Refreshed Code of Conduct to incorporate modern slavery commitments
Speak-up standard launched

04 Collaboration

Contribution to the Human Rights Resources and Energy Collaborative (HRREC)
Expanded internal working group membership

Synergy overview⁴

Legend

- South West Interconnected System (SWIS)
- Thermal power station
- Wind farm
- Gas turbine
- Battery

*Battery under construction



Synergy is proud to be Western Australia’s largest electricity generator and energy retailer. Our objective is to work together with our household and business customers towards an intelligent energy future of safe, reliable, low emission power at the lowest sustainable cost.

Established under the Electricity Corporations Act 2005 (WA), and owned by the State Government of Western Australia, Synergy’s board and management report to the Minister for Energy, the Hon Bill Johnston MLA.

Synergy is the largest integrated electricity generator and retailer in the South West Interconnected System (SWIS). Our diverse large-scale renewable and traditional thermal generation portfolio plays a critical role in supplying efficient energy to wholesale and retail customers.

Western Australia is undergoing an energy transformation, and Distributed Energy Resources (DER) are becoming an increasing part of our energy system. DER includes rooftop solar, battery storage, electric vehicle charging stations, virtual power plants (VPP), stand alone power systems, and micro grid systems.

As this evolution continues, Synergy is working adaptively with our partners, customers, and communities to unlock the exciting opportunities and benefits offered by DER.

Synergy’s purpose is clear – to work together with Western Australians towards their intelligent energy future.

⁴ Mandatory criteria outlined in section 16(1)(b) of the *Modern Slavery Act 2018*.

Our operations and supply chain⁵

Our Operations

Synergy is the sole retailer of electricity to residential households in the SWIS. We also supply energy to commercial and industrial customers in the contestable gas and electricity markets. We own and operate both thermal power stations and renewable electricity generation facilities from Coral Bay in the north, to Kalgoorlie in the east and to Esperance in the south.

Synergy's wholly owned subsidiary SWSDH and its subsidiary SynergyRED, provide development and asset management services for large scale renewable projects in Western Australia.

In the face of a changing energy landscape and guided by Synergy's corporate strategy, our focus is on a seamless and secure transition to the new energy future. We know that our customers' needs are changing rapidly, and we need to continuously evolve and adapt with them.

Synergy is moving away from a centralised generation and network model, to a future that increasingly incorporates DER and new technology options. Key elements of the DER roadmap and Western Australia's energy transformation strategy include the PowerBank community battery storage trials and VPPs. Our interest in Bright Energy Investments plays an important role in developing our large-scale renewable energy generation capacity. To date, this has supported construction of the 180MW Warradarge Wind Farm and the 30MW Stage Two expansion of the Greenough River Solar Farm in the mid-west. Planned construction of a 100MW/200MWh battery on part of the decommissioned Kwinana Power Station site (affectionately known as the "big battery"), is also underway. Western Australia's first big battery is a significant part of Synergy's contribution to the State Government Energy Transformation Strategy and DER Roadmap.

Our business is organised into three key areas, supported by our corporate shared services functions.



Retail

We are WA's biggest energy retailer, supplying our customers with electricity and gas. We have one million residential, business and industrial customers within the SWIS of Western Australia.

We provide 52 percent of electricity sold to household and business customers and 55 percent of the contestable gas load in the industrial and commercial market.



Energy Generation

Our assets include traditional thermal generation at Muja and Collie power stations, gas turbines at Kwinana, Pinjar, Kalgoorlie-Boulder and Mungarra and significant renewable energy capacity at wind and solar farms from Coral Bay to Esperance and in the Great Southern region.

The future will see us continue to adapt our operations and explore the innovative use of DER and renewable energy.



Wholesale

Synergy participates in the Wholesale Electricity Market in Western Australia, trading gas and wholesale electricity under ring fenced arrangements. The wholesale market continues to evolve with increases in large and small-scale renewables. This includes changes to load shape, decreased predictability and increased complexity. In anticipation of these ongoing shifts in the energy market, Synergy is proactively adapting its wholesale operations.



Sustainability

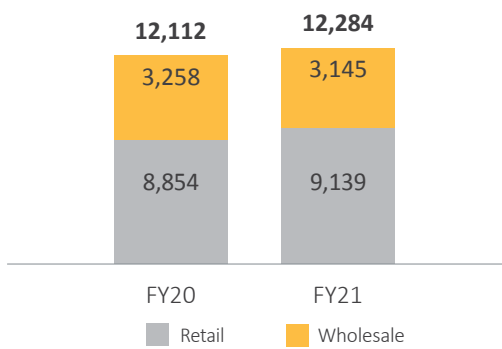
Underpinning all that we do, is our dedication to our people, their safety and development, the environment in which we operate, and sustainable operations and workplace practices.

⁵ Mandatory criteria outlined in section 16(1)(b) of the *Modern Slavery Act 2018*.

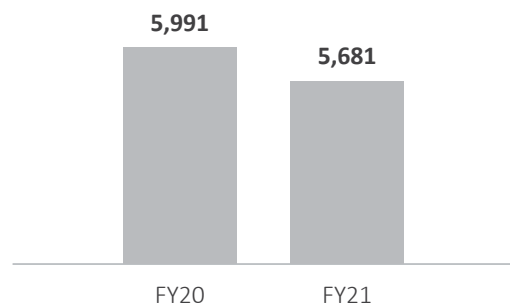


In financial year 2020-21 Synergy’s revenue was \$3.058 billion. Our total electricity sales reached 12,284 GWh and generation from Synergy’s plant was 5,681 GWh.

Electricity sales (GWh)*



Generation (GWh)*



Our Corporate Strategy

02

Quickly apply, scale and integrate energy solutions.

We will evolve our business and continuously be a step ahead in developing and providing energy solutions for our customers.



01

Anticipate and serve customer needs.

We will drive customer understanding at every level of our organisation and work together to develop personalised solutions.

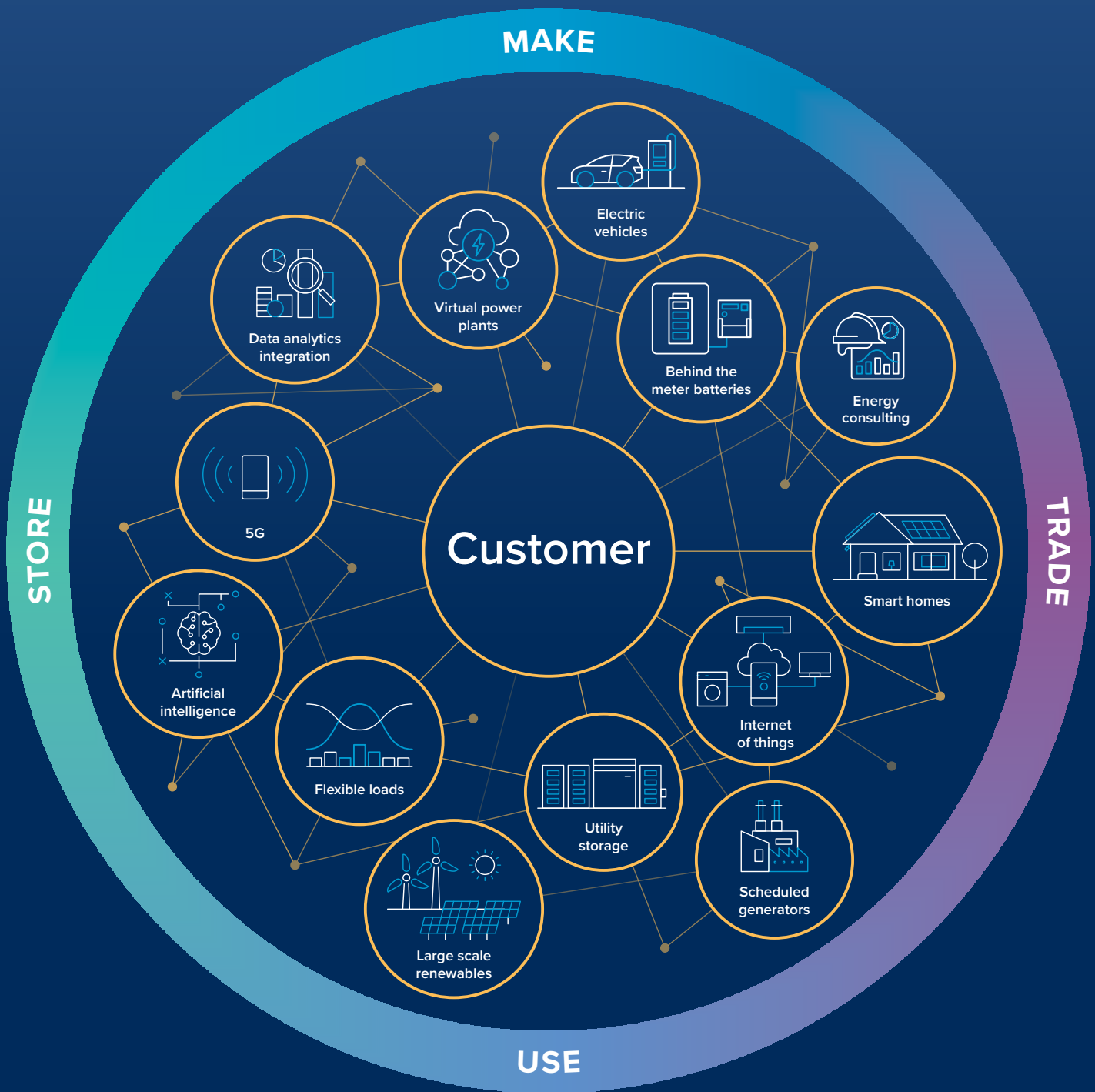
03

Be a proactive and adaptable organisation focused on value.

We will drive efficiencies, invest in data and analytics, leverage new technologies and be at the forefront advocating for market and regulatory reforms to drive value for our customers and our business.

The energy value chain is transitioning from a simple make and use system to a complex one, in which customers make, trade, store and use energy simultaneously. Our role is to connect and integrate solutions to meet the needs of all customers now and in the future.

Our corporate strategy ensures that we continually evolve and adapt to meet the changing market.





Our Culture and Values

Our progressive new corporate strategy is designed to shift our culture and the way we do business. Synergy has begun a purposeful transition to an adaptive culture with customers at its core. This cultural transition will add momentum to the execution of our corporate strategy and help us achieve our sustainability and social responsibility aspirations. Underpinning our purpose, new corporate strategy and cultural transition are four core values: innovation, accountability, collaboration, and trust.

Our people

Synergy employs people across a range of technical, operational, and professional roles within the Perth, Kwinana, and Collie regions of Western Australia.

Our people are the heart of Synergy. We embrace the unique experiences and perspectives that we all bring and focus on creating an environment where diverse and talented people thrive.

Synergy has a two year inclusion and diversity strategy that focuses on four pillars; creating an inclusive culture, implementing a reconciliation action plan, increasing woman in leadership and supporting employment for people with all abilities.

We have been raising awareness about diversity, inclusion and the importance of belonging. In 2020-21 our workforce was comprised of 937 employees supported by 134 contractors. We employed an additional 11 employees with disclosed disability and continued to build female representation in our workforce and leadership with women accounting for 41% of these roles. By prioritising diversity and inclusion, culture transformation, workforce engagement, continuous learning, health and wellbeing we continue to attract and retain people aligned to our purpose.

Our employees have a choice to work for Synergy and it's a choice we respect and value. The majority of our team's employment conditions are governed by one of three Enterprise Agreements. These Enterprise Agreements are negotiated with employee representatives, approved by the Fair Work Commission and published internally on our intranet. The working conditions of our employees and contractor personnel are underpinned by Australia's federal industrial relations framework and we have strong governance controls in place to ensure ongoing compliance with our obligations.

In 2020-21 we conducted employee engagement surveys for the fourth year in a row, using the Gallup platform. The results positively indicated that Synergy has sustained and improved engagement levels, strengthening our position as a top quartile organisation against the Australian benchmark, and as a second quartile organisation against the Gallup global benchmark.

Our Values



INNOVATION



ACCOUNTABILITY



COLLABORATION



TRUST

Our Supply Chain⁶

Synergy undertakes its sourcing activities through a centralised procurement function in Perth, Western Australia. Our team is guided by our corporate values and our framework of contract and procurement management policies, standards and procedures that encourage socially responsible sourcing and the use of locally based suppliers where possible.

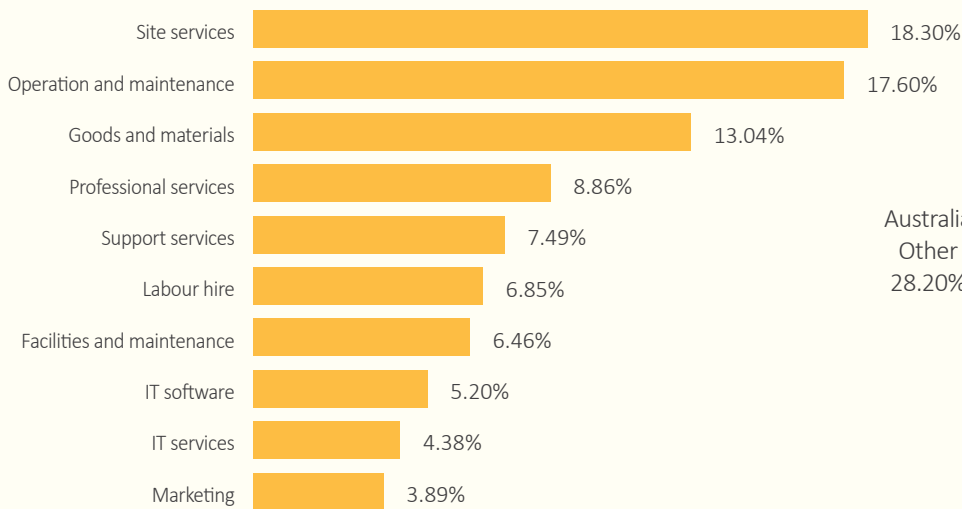
In financial year 2020-21 Synergy's overall expenditure was \$2.8 billion including energy, fuel, energy transportation, services and materials.

Our contestable procurement spend was approximately \$348 million⁷. The figures reported are based on spend with our direct suppliers and we understand this does not necessarily provide an indication of where products or raw materials are sourced from.

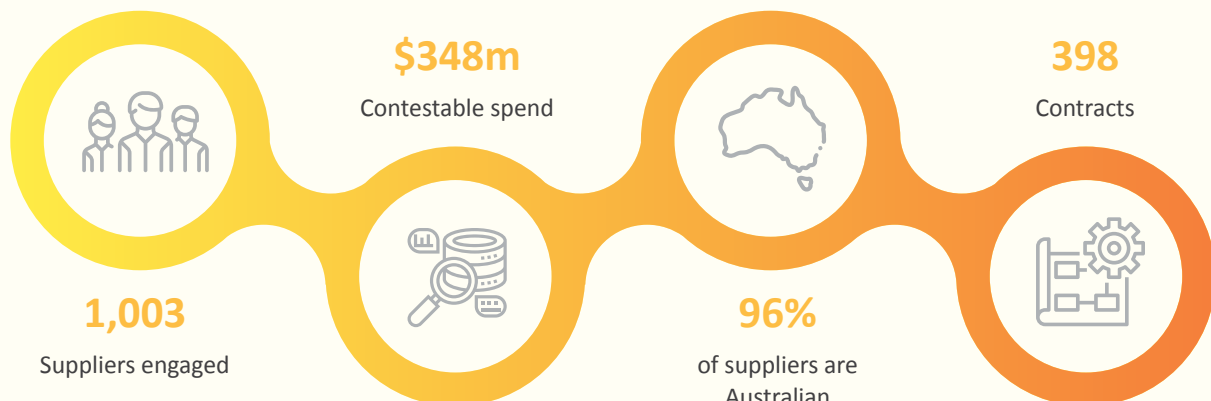
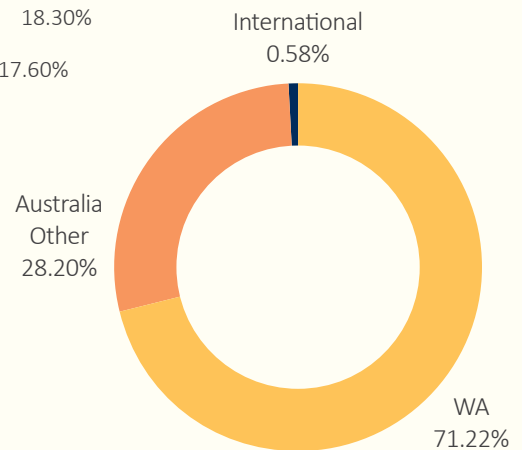
Synergy has 1,362 active suppliers and in financial year 2020-21 we directly engaged 1003 of those for procurement of materials and services to support our operations. Our "buying close to home" approach is effective, over 96 percent of Synergy's direct suppliers are Australian entities, and 71 percent (\$248 million) of our contestable spend was with Western Australian entities.

Most of Synergy's goods and services expenditure relates to the provision of operation and maintenance services for our generation assets. Synergy's contracting arrangements range from short term (<12 months) purchase orders through to longer term (> 5 years) contracts. Synergy has 398 active contracts, approximately 50 percent of which pre-date the introduction of the *Modern Slavery Act 2018* (Cth). We are reviewing these contracts to ensure that modern slavery risks are adequately addressed.

Top 10 Categories (Contestable spend)



Contestable spend by location



⁶ Mandatory criteria outlined in section 16(1)(b) of the *Modern Slavery Act 2018*.

⁷ Contestable Spend excludes purchase of energy, fuel, and energy transportation costs.



Modern slavery risks and actions⁸

We reject any form of exploitation in our operations and are committed to eradicating modern slavery risks directly or indirectly related to our business. It's our policy to conduct business in a manner that protects our people, our contractors and business partners, our customers, and the broader community.

We are not aware of any actual modern slavery during the Reporting Period however we accept that eradicating modern slavery is a long term ambition and that no sector or entity can claim to be free of modern slavery risks.

Identifying and assessing the risk

We have consulted with our subsidiaries with respect to their modern slavery risks and confirm they have reported no additional risks to those already identified.⁹ In the Reporting Period, Synergy's subsidiary, SynergyRED, updated its procurement policy to recognise the risk of modern slavery and its compliance with Synergy's own procurement standards and practices in respect to modern slavery.

Synergy's modern slavery risk identification process includes reviewing our workforce engagement practices as well as the risk associated with our supplier's location and industry type.

We reject any form of exploitation in our operations and are committed to eradicating modern slavery risks directly or indirectly related to our business.



⁸ Mandatory criteria outlined in section 16(1)(c) and 16(1)(d) of the *Modern Slavery Act 2018*

⁹ Mandatory criteria outlined in section 16(1)(f) of the *Modern Slavery Act 2018*

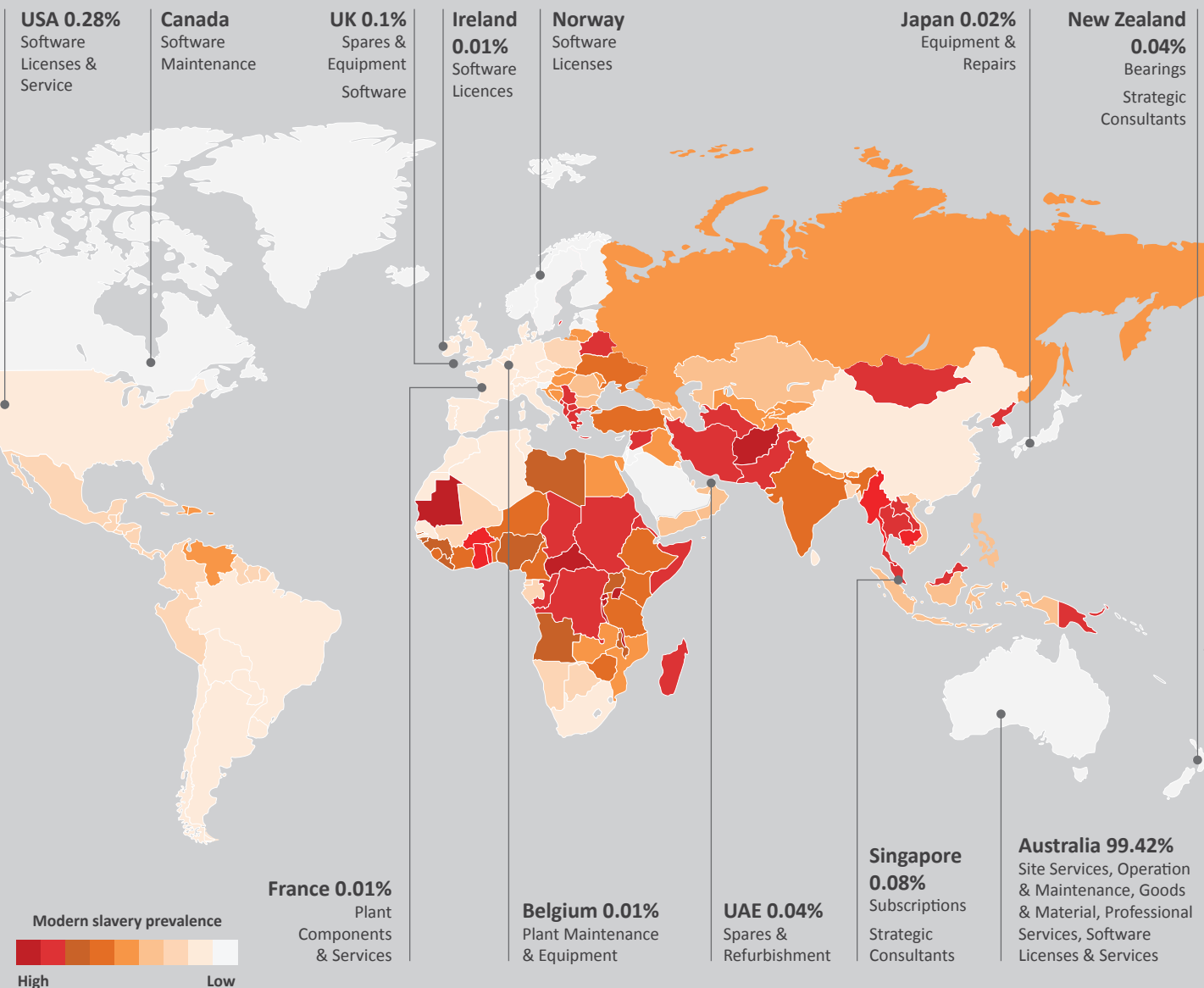
Using the Global Slavery Index¹⁰, Synergy has classified its operational and supply chain risks into the areas of country risks, industry/category risks and workforce risks.

Synergy is currently primarily assessing country risk based on the location of the direct suppliers being used for the procurement of goods and services. We are aware that additional modern slavery risks may be evident as we further explore the country of origin of products and raw materials. We are committed to continuing to explore and uncover risks, particularly within the levels below our direct suppliers, and within categories of elevated risks.

Country risks

Our review for this Reporting Period identified that our direct imported country risk remains low. In financial year 2020-21, 99 percent of Synergy’s spend, and over 96 percent of orders were with Australian entities. Where Australian suppliers are not available or feasible, Synergy occasionally procures from suppliers based in countries with higher modern slavery risks such as Singapore, Japan, the UAE and USA.

Country Map – Direct Supplier Location



10 Published by Walk Free Foundation www.walkfree.org/projects/the-global-slavery-index/

Industry and category risks

A desktop review of all suppliers and contestable spend in the Reporting Period, performed in collaboration with an expert external consultant,¹¹ identified that the industries and categories of highest risk in our supply chain have not changed substantially from the financial year 2019-20. They are:



Workforce risks

Synergy's modern slavery risk within our direct workforce engagement remains low. Our remuneration structures and conditions are predominately governed by collectively bargained enterprise agreements and underpinned by the Australia's federal industrial relations system. The prohibition of discrimination, equal opportunity and the working conditions of our employees and contractor personnel are further protected through the governance standards, policies and procedures outlined in Appendix 1.

We help our frontline people leaders understand our expectations and implement our policies in ways that respect human rights through training and support from human resource and employee relations professionals.

Use of temporary labour hire and subcontract labour is a key modern slavery risk area for many businesses in Australia including Synergy. In financial year 2020-21 Synergy established a new panel of contracts for the provision of labour hire services. All panel contracts include an obligation for the labour hire companies to comply with modern slavery laws, notify Synergy of any instance of modern slavery identified in their operations or supply chain (including subcontractors) and, should any risk be identified, to provide Synergy with access to audit and assistance to address the risk.

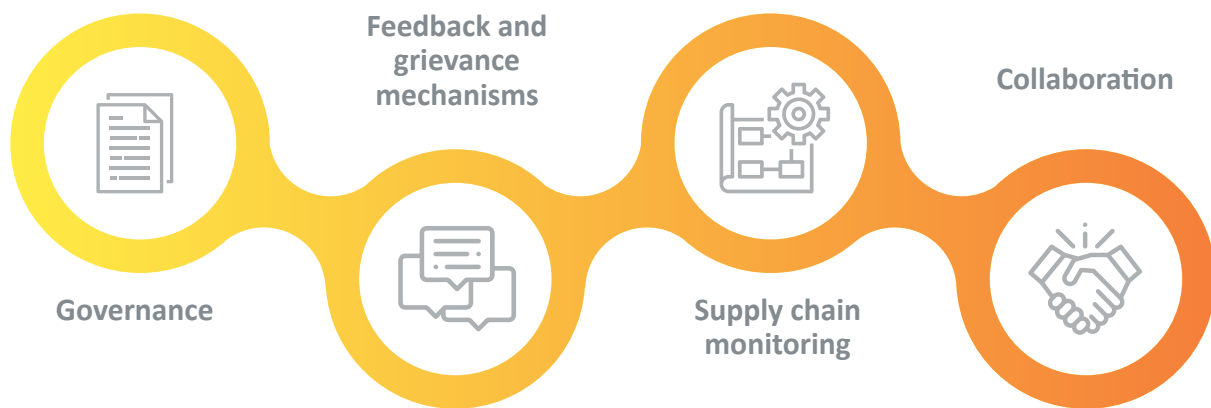
We are committed to providing and maintaining a work environment that supports and enhances the mental health and wellbeing of all our people.





Addressing the risk

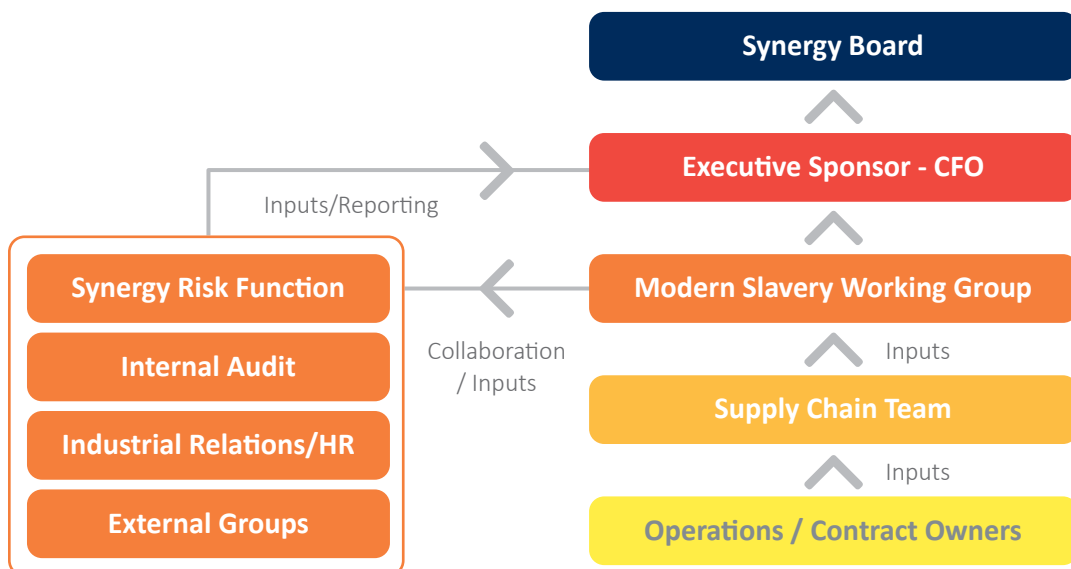
Synergy’s approach protects and promotes the wellbeing of our people and informs employees, contractors, suppliers and customers of how we do business. Building on the work undertaken last year, Synergy has acted to address modern slavery risks through four key pillars.



The governance documents in each pillar that contribute to Synergy’s identification, assessment and mitigation of modern slavery risks are detailed in Appendix 1.

Governance

To help improve our modern slavery governance processes, Synergy has expanded membership of its internal modern slavery working group and established a framework for accountability, escalation and audit of modern slavery risks.





Synergy’s Code of Conduct is a key document that sets out standards for appropriate ethical and professional behaviour for Synergy employees and contractors. Our values underscore our Code of Conduct and assist all of our people in behaving professionally and with integrity.

Our Code of Conduct is reviewed bi-annually to ensure that it continues to keep pace with the highest standards of respect, responsibility and integrity. In this year’s review, we were delighted to introduce our commitment to preventing slavery and human trafficking in our operations and in the operations of those that provide goods and services to Synergy. Our next review will consider more detail around our expectations of suppliers and their subcontractors with respect to sustainability, including human rights.

We are committed to preventing the occurrence of slavery and human trafficking in Synergy’s own operations and in the operations of those that provide goods and services to Synergy.

Feedback and grievance mechanisms

Misconduct is not tolerated at Synergy, and in promoting a culture of integrity and speaking up, Synergy has developed an Integrity Framework. The Framework supports our Code of Conduct and comprises standards, procedures and guidelines for whistleblowing, Public Interest Disclosure (PID), investigations and reporting.

Synergy’s new “Speak Up Standard” outlines several avenues and resources for people to raise their concerns about business conduct. People can raise concerns directly with a member of our people and culture team, a PID officer or through the confidential Synergy Stopline.

Supply Chain Monitoring

In financial year 2019-20 Synergy launched a Supplier Assessment Questionnaire (SAQ) to a pilot group of suppliers, in order to gain a better understanding of potential modern slavery risks within our supply chain. In the Reporting Period, we expanded the reach of the SAQ to all suppliers that operate in countries or industries with an elevated modern slavery risk. The SAQ formed part of the assessment process for key tenders such as the tender for the construction of the Kwinana “Big Battery” and the supply of solar panels for the social housing project.

We also developed a framework for assessing supplier responses to the SAQ including rating the questionnaires based on modern slavery risk and maturity.

We all have an obligation to act responsibly, respectfully and with integrity. Our code of conduct informs everyone of our company’s expectations, clearly sets out boundaries within our organisation and standards for interacting with each other as well as our customers, owners, suppliers and the general public.





Collaboration

Synergy is committed to educating our people to better understand modern slavery risks and building capability to act and remove these risks from our operations and supply chain.

We recognise that one of the most effective ways to build our internal capability, whilst driving meaningful change, is by joining with others in our industry. This helps to elevate awareness and to foster open and aligned messaging that articulates our collective expectations to suppliers and assists them to enact change.

Synergy is pleased to be an active participant in the Human Rights Resource and Energy Collaborative (HRREc). This group has met throughout the Reporting Period to share knowledge and collaborate on development of human rights due diligence, governance and remediation tools.



In addition to the HRREc, Synergy actively engages with other government trading entities to strengthen our relationships and to align, where appropriate, our approach to modern slavery within our shared supply networks.

We are currently investigating ways in which we can align our investigation of modern slavery risks in common supply categories.

Responding to COVID-19

There were no notable COVID-19 related modern slavery risks observed in our operations or supply chain for financial year 2020-21. However, border controls within Australia had minor impacts on our ability to engage in person with suppliers, industry collaborators and subject matter experts to perform reviews and training.

Our response to COVID-19 focused on maintaining safe delivery of reliable energy for Western Australia, keeping our team safe and informed and supporting our customers impacted by financial hardship due to the ongoing pandemic. Synergy, in collaboration with the State Government implemented the Helping Hands program, as rapid response to the widespread economic impacts of Covid 19. Many of our customers experienced unprecedented hardship during COVID-19 so it has been more important than ever to provide practical support to our community.

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The effectiveness of our actions¹²

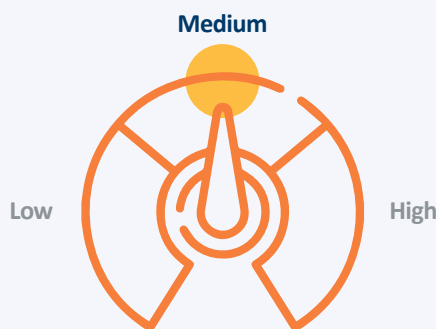
In order to assess the effectiveness of our actions to address modern slavery risks, Synergy engaged with an expert consultant to review Synergy’s current processes and procedures, assess our level of maturity in relation to modern slavery governance and develop an actionable two-year roadmap.



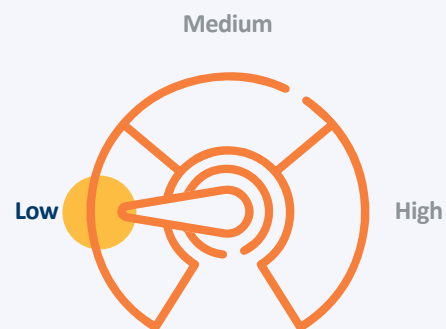
The assessment indicated that Synergy was operating at a medium level of maturity in comparison to its peers and that Synergy’s operational risk for modern slavery is low.

The two-year roadmap identified opportunities for improvement across three horizons, with a focus on (1) policies, standards and tools, (2) training & communication, (3) governance and reporting and (4) investigation and refinement.

Synergy’s modern slavery maturity



Synergy’s operational risk



Horizon One – Embedding Modern Slavery into BAU

12 Months

Short Term Recommendations

Focuses on developing strategies, and refining tools/resources for the implementation of the modern slavery practices as BAU.

Horizon Two – Integrating Modern Slavery with ESG

12 to 24 Months

Mid Term Recommendations

Align and integrate modern slavery and human rights within Synergy’s broader ESG agenda – communications between all levels of staff and suppliers to enact the move towards sustainable practices (which include modern slavery & human rights).

Horizon Three – Sustain & Improve

24 months and beyond

Long Term Recommendations

Sustain and provide ongoing improvements through performance monitoring, periodic training, consistent communication and identification of improvement opportunities.

¹² Mandatory criteria outlined in section 16(1)(e) of the *Modern Slavery Act 2018*

Looking forward

This is Synergy’s second modern slavery statement. As an organisation we are rapidly moving toward a new energy future, our strategy recognises that renewables and DER technology (rooftop solar panels, wind farms, battery storage, electric vehicle charging, virtual power plants, standalone power plants, micro grid systems, smart appliances and advanced metering) will become an increasing part of our energy system in the SWIS.

As a result, our operations and supply chain are also evolving, and our new emerging energy system must be delivered sustainably with the same level of dedication to people, safety, the environment, and the communities with whom we engage.

We will continue to work collaboratively with suppliers and industry partners to build our visibility and capability to monitor, assess and act on modern slavery risks.

As we mature, we will look towards the integration of modern slavery and human rights within Synergy’s broader environmental, social and corporate governance strategy as well as identifying and implementing improvement activities to build our capability and drive sustainable long-term outcomes.

Future Actions

02

Training and Communication

Training for the Board of Directors.
Development of a Training & Communication Plan.
Continue Training Rollout.

04

Investigation and Refinement

Risk Adjustment Approach.
Continuous Improvement.

01

Policies, Standards and Tools

Refined processes and templates.
Risk assessment and SAQ expansion.
Consider the use of technology to assist with risk identification.

03

Governance and Reporting

Consider linking modern slavery to broader ESG framework.
Extended Industry Collaboration.
Audit Strategy.



Appendix 1

Key governance documents that detail the approach, expectations and practices to protect human rights in our internal operations and mitigate modern slavery risks in our supply chain.

Operations (People) Governance	
	Purpose
Code of Conduct	Sets out standards for appropriate ethical and professional behaviour for Synergy staff and contractors.
Speaking Up Standard	Explains the channels for speaking up; how and to whom people can speak up; what happens when people speak up; and the protections given to people who speak up.
Public Interest and Whistle-blower Procedure	Contains processes for raising concerns about actual or suspected misconduct at work under the PID Act or as a whistle-blower.
Misconduct Reporting Procedure	Outlines the requirements for personnel who receive reports about actual or suspected misconduct.
Recruitment and Selection Standard	Defines the minimum mandatory performance requirements for sourcing activities associated with recruitment and selection of employees at Synergy.
Equal Opportunity Standard	Provides guidance to ensure that all employees and potential employees are treated consistently, equitably, and fairly.
Remuneration Standard	Outlines the key reward principles to remunerate employees fairly and equitably.
Non-Contractual Benefits Standard	Details the additional employee benefits provided to supplement contract remuneration packages.
Bullying, Discrimination and Sexual Harassment Standard	Explains Bullying, Discrimination and Sexual Harassment and provides guidance on what to do if the standard is breached.
Flexible Working Arrangements Standard	Sets out the core principles by which any flexible working arrangement at Synergy is to align, including the legislative provisions applicable to certain categories of employees.
Overtime Management Procedure	Provides the framework for consistent allocation, approval and management of overtime. Includes framework for the fatigue management procedure.
COVID- 19 Work Practices Procedure	Defines the steps required to manage absences or changed work practices associated with COVID-19.
Health and Safety Governance	
Health and Safety Policy	Outlines our commitment to the health and safety of our people.
Health and Safety Risk Management Procedure	Describes the process, procedure and tools for planning, undertaking and follow up action for H&S and process safety hazard and risk reviews.
Fatigue Management Procedure	Provides appropriate guidance, knowledge, and tools for the safe management of fatigue.
Contract and Procurement Governance	
Procurement Standard	Sets out the standards applicable to all employees in the conduct of activities for procurement of materials and services.
Procurement Procedure	This procedure provides guidance and instructions to support the execution of the procurement process by the procurement team.
Procure-it Contract Framework Procedure	Describes the requirements and steps to request, source, award, manage and complete a contract at Synergy.

Working with
Western Australians
towards our
**intelligent
energy future**





Forrest Centre
219 St Georges Terrace, Perth, WA 6000
GPO Box F366, Perth, WA 6841

synergy.net.au

For the Electricity Generation and Retail Corporation trading as Synergy
ABN 58 673 830 106