



Modern Slavery Statement 2020

Important Information

Origin Energy is an Australian company (ACN 000 051 696), registered in New South Wales.¹ We're a leading provider of energy to homes and businesses with interests across energy exploration, production, power generation and retailing. We have extensive operations across Australia, as well as wholly and partly owned subsidiaries in Papua New Guinea and the South Pacific. We have prepared this Modern Slavery Statement (Statement) in line with the requirements of the Australian *Modern Slavery Act 2018* (Cth). It explains the actions we have taken to assess and address modern slavery risk exposures in our operations and supply chains during the financial year ending 30 June 2020 (FY2020).²

We are also involved in a number of operated and non-operated joint ventures, the most material of which is Australia Pacific LNG, in which we hold a 37.5 per cent share and act as upstream operator. Origin's operations and supply chains as upstream operator, CSG marketing agent and corporate services provider for Australia Pacific LNG are included in the scope of this Statement.

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

At June 2020, Origin has over 5,200 employees, with approximately 240 based at our Australian regional locations and 400 at international operations, as well as almost 400 contingent workers.

In addition to Origin's energy business and interests, our subsidiaries include the Origin Foundation, a philanthropic foundation whose focus is to support programs that use education to help break the cycle of disadvantage for young Australians. We have not included this foundation within our assessment.

This report may reference significant events occurring after 30 June 2020. Where this report contains forward looking statements, including statements of current intention, statements of opinion and predictions as to possible future events, these statements are not statements of fact and there can be no certainty of outcome in relation to the matters to which the statements relate.

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

¹ In this statement a reference to 'Origin', 'Origin Energy', 'Group', 'Origin Group', 'Company', 'we', and 'our' is to Origin Energy Limited and its controlled entities and joint venture arrangements as outlined in our 2020 Annual Report.

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



Message from our CEO

I am pleased to present Origin's first Modern Slavery Statement.

Our purpose, *getting energy right for our customers, communities and planet*, demonstrates that we recognise the decisions we make within Origin can significantly affect the livelihoods of people and communities.

We recognise our responsibility and the opportunity to help eradicate modern slavery. We understand that this is key to running a sustainable business, as well as reflecting one of our core values: care about our impact.

We understand the importance of responsible procurement and ensuring that environmental, social and ethical considerations are taken into account when making procurement decisions. Together, our **Human Rights Policy** and responsible procurement approach, guide our management of modern slavery risks.

In FY2019 we began the assessment of modern slavery risks in our supply chains and introduced our **Supplier Code** and vendor Self-Assessment Questionnaire.

During FY2020, we expanded this approach and have built our understanding and enhanced our engagement with suppliers to identify and manage our modern slavery risks.

We have done this through consultation with experts and by increasing awareness of the risk of modern slavery across our business.

We recognise that our people, suppliers and participants in our supply chain can contribute to combatting modern slavery. Consequently, we have expanded our grievance mechanism, the Origin ConcernLine, to include reporting of modern slavery concerns.

To continue to improve, we have developed a Modern Slavery Maturity Plan with clear actions, accountabilities and timeframes.

We will complete these actions while continuing to remain up to date with industry and international best practice approaches through collaboration with suppliers, peers and advisors.

Any form of modern slavery is unacceptable, and I am proud of the work Origin has done and continues to do to assess and address the risk of modern slavery within our operations and supply chain.

A handwritten signature in black ink that reads "Frank Calabria".

Frank Calabria
Chief Executive Officer
August 2020

FY2020 Highlights



Built our understanding of modern slavery risk

- Rigorous four step methodology applied to assess, prioritise and address modern slavery risks
- Benchmark review completed
- Cross functional Modern Slavery Working Group formed to ensure a whole of Origin approach

Improved our policies and processes

- Modern Slavery Maturity Plan developed
- Human Rights expectations enshrined in Human Rights Policy and Supplier Code
- Grievance mechanisms improved
- Remediation guidance developed

Enhanced our engagement with suppliers

- Vendor Self-Assessment Questionnaire rollout expanded
- Piloted Supply Chain Traceability Tool

About Origin



Origin at a glance

ASX TOP
50

Leading integrated energy company

Listed on the Australian Securities Exchange in 2000



4.2 million customer accounts

Electricity, gas and LPG customers across Australia and the Pacific



5,200 employees

Inclusivity in the workplace, leading parental support



Five-pillar approach to decarbonisation

Australia's first science-based emissions targets, aligned with the Paris Agreement



Powering Australia

7,400 MW generation portfolio, including 1,400 MW owned and contracted renewables and storage



37.5% interest in Australia Pacific LNG

Exporting to Asia and supplying ~30% of Australian east coast gas demand



Supporting Australian communities

Over its 10 years, the Origin Energy Foundation has contributed more than \$27 million



Driving future energy innovation

Investing in new technology, start-ups and future fuels



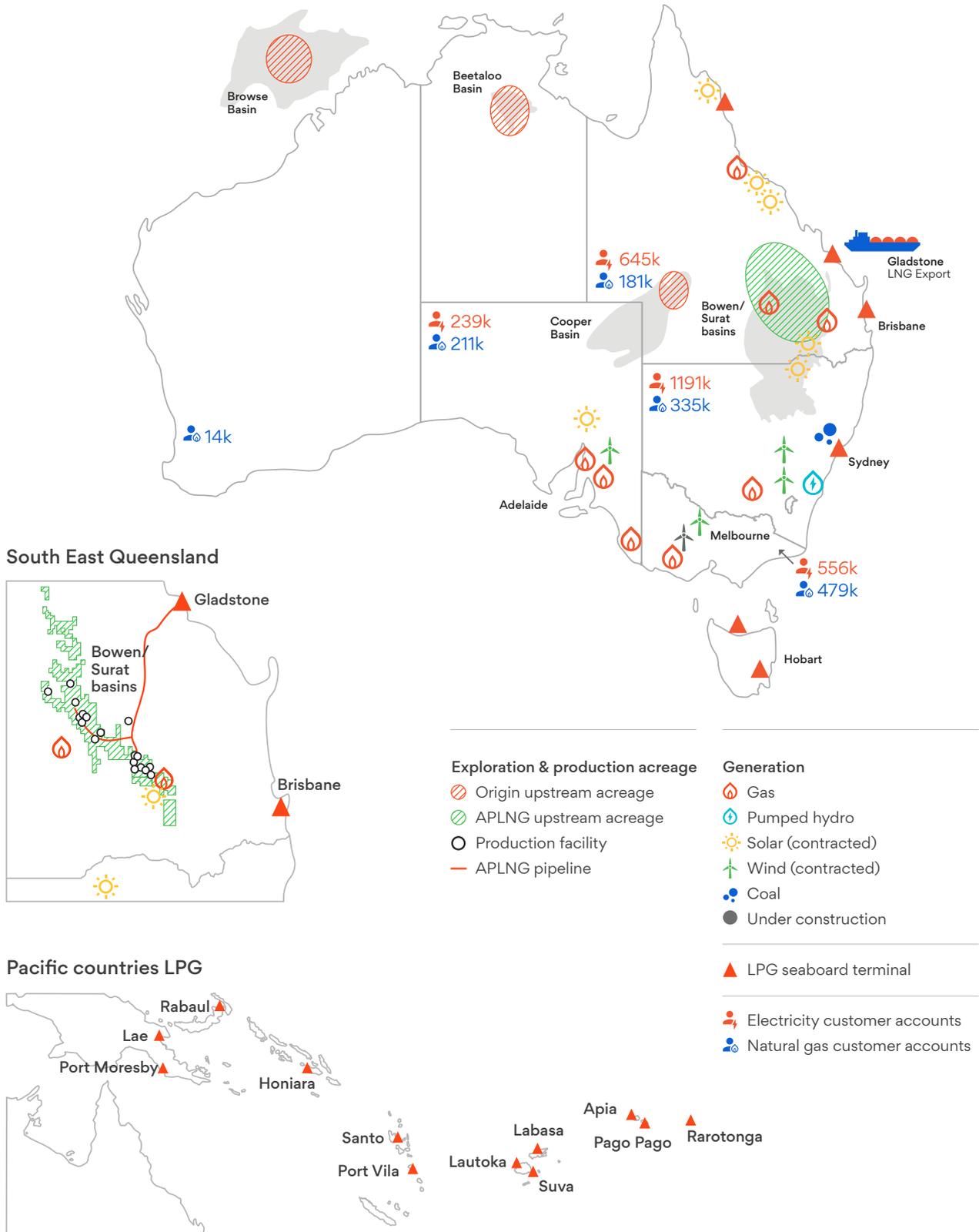
Exploration and development

77.5% interest in Beetaloo Basin exploration permits

Bringing
good energy
to everything
we say
and do.



Where we operate



Our approach and commitment towards human rights and addressing modern slavery

Our approach to human rights and modern slavery is enshrined in our Human Rights Policy. We protect and uphold fundamental human rights at all our operations and projects in line with our policy.

The policy applies to our directors, employees, contractors and visitors to our work sites. The policy reflects our commitment to respect human rights and address modern slavery by confirming that we:

- respect that all personnel have a right to fair pay and reasonable work conditions;
- respect the right of freedom of association with others;
- respect the right of freedom of movement; and
- reject any form of slavery in our operations and supply chain, including but not limited to forced, bonded, or child labour.

Additionally, our Supplier Code, launched in April 2019, sets out our expectation that suppliers comply with all applicable laws and demonstrate their respect for, and protection of, the fundamental human and labour rights of workers. In relation to modern slavery, our Supplier Code requires that all workers have:

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

Our Supplier Code is a key component of our overall approach to responsible procurement.

Responsible procurement journey to date

FY2018

- Commenced development of Supplier Code and Vendor Self-Assessment Questionnaire (SAQ)
- Became signatory to the Australian Supplier Payment Code

FY2019

- Released our Supplier Code
- Launched our Vendor Portal and invited over 500 key suppliers (55% of goods & services spend) to complete our SAQ
- Commenced engagement with our key suppliers about responsible procurement

FY2020

- Incorporated Supplier Code requirements into new contracts
- Established Modern Slavery Working Group
- Expanded SAQ coverage to over 690 key suppliers (62% of goods & services spend) to assess modern slavery risks
- Developed Modern Slavery Maturity Plan
- Updated Human Rights Policy

Our management of our modern slavery risks

Management of our human rights risks, including modern slavery, is underpinned by our Human Rights Policy and Risk Management Framework, with oversight from the Origin Board Risk Committee. For further information on our Risk Management Framework, refer to section 7 of the FY2020 Operating and Financial Review.

We have applied a rigorous four step methodology to manage modern slavery risks in our operations and supply chain:

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

These four steps are outlined further below.

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

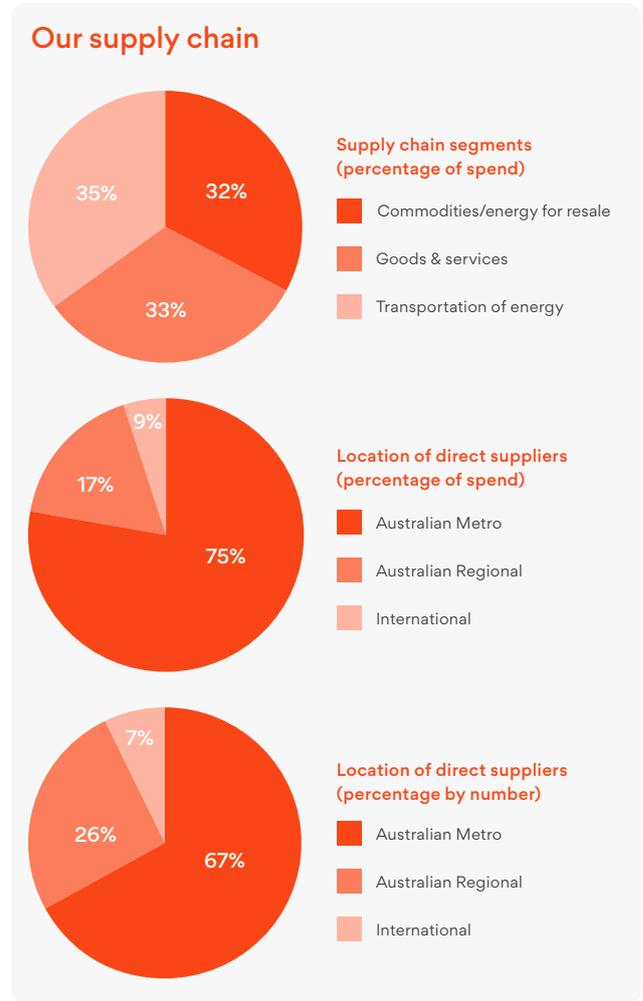
Origin understands that our business activities, could cause, contribute or be directly linked to modern slavery practices.³ For the purposes of this Statement and in accordance with the legislation, reference to our business activities includes:

Operations

- **Our direct operations of wholly/partly owned subsidiaries and philanthropic activities** – including the employees and contingent workers who operate our business and the employment conditions under which they work.⁴
- **Funding relationships/equity investments** – in start-up companies and new ventures.
- **Non-operated joint ventures** – where we are not directly making day-to-day operational decisions.

Supply Chain

- **Our suppliers of goods and services** – a wide range of categories including, but not limited to, wellheads, drilling and power generation equipment, IT hardware, safety equipment, solar panels, home batteries, personal protective equipment / work wear, call centres, facilities maintenance and construction services.
- **Our suppliers of commodities/energy** – including coal, gas, LPG for resale and renewable energy.
- **Transportation of energy/products to customers** – including shipping, pipelines and energy distribution.



A supply chain of almost 4,000 direct suppliers and approximately \$9 billion spend per annum.⁵

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

⁴ Philanthropic operations to be included in FY21 risk analysis.

⁵ Supply chain spend is approximate annualised third party spend excluding taxes, government charges, joint venture, intercompany transfers and landowner compensation payments.

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

- **Country of operation** – the vast majority of our operations and direct suppliers are located in Australia. However, some of our wholly/partly owned subsidiaries and supplier manufacturing locations operate in countries associated with a higher risk of modern slavery practices.⁶
- **Category of supplier service** – for example, we procure construction and facilities maintenance services which are industries with known domestic incidences of modern slavery.⁷
- **Resources used in goods** – for example, we procure electrical equipment containing metals and minerals that may be sourced from regions known to be more highly exposed to risks of modern slavery practices.
- **Type of workforce** – for example, contingent workers employed across parts of our operations or non-operated joint ventures, can be at increased risk of modern slavery.

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

Within our operations we identified that our wholly/partly owned subsidiaries operating in Papua New Guinea, Fiji and Solomon Islands have our highest potential exposure to modern slavery. As a result, this focus area has been prioritised for further due diligence activities in our Modern Slavery Maturity Plan actions for FY2021.

To better understand our potential modern slavery exposure in our supply chain we assessed our third-party spend (excluding taxes, royalties, land-owner compensation), vendor Self-Assessment Questionnaire (SAQ) results and RepRisk business conduct data.⁸ By applying the following principles to this assessment, a ranked list of supplier risk profile groupings has been identified and used to inform our Modern Slavery Maturity Plan actions for FY2021:

- **Contribute vs directly linked** – instances where Origin is at risk of contributing to modern slavery practices are prioritised over instances where Origin may be directly linked.
- **Direct vs extended supply chain** – risks that exist within Origin’s suppliers where we have a direct commercial relationship are prioritised over relationships in the extended supply chain.

- **Location** – goods manufactured offshore in higher risk countries prioritised over onshore manufacturing. Onshore services known to be higher risk for modern slavery are prioritised over offshore services.
- **Materiality** – high risk categories where the spend for the product/service is material to Origin.

Within our supply chain, we have identified and consider the following to be higher risk supplier profiles where modern slavery practices are more likely to occur:⁹

Supplier profile	Higher risk supplier profile
Direct Manufacturing	Suppliers that manufacture goods in a country with higher risk of modern slavery practices
Indirect Manufacturing	Suppliers that distribute goods likely to be manufactured in a country with higher risk of modern slavery practices
Onshore Services	Suppliers relying on or providing a service in a category known to have a higher risk of modern slavery practices in Australia
Offshore Services	Suppliers that rely on or supply services based in a country with higher risk of modern slavery practices
Commodities	Suppliers that provide goods that contain one or more commodities known to be high-risk of modern slavery practices

⁶ According to modern slavery related country vulnerability and risk indices, including the Global Slavery Index - [globallslaveryindex.org](https://www.globallslaveryindex.org). Geographic locations where we could be more highly exposed include, but are not limited to, Papua New Guinea, Fiji and Solomon Islands. Suppliers that manufacture in countries associated with a higher risk of modern slavery practices include, but are not limited to China, Saudi Arabia and Papua New Guinea.

⁷ According to <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>

⁸ RepRisk is a Web-based tool which provides insights on environmental and social issues that present financial and reputational risks to a company - <https://www.reprisk.com>

⁹ According to independent modern slavery related vulnerability and risk indices for country, industry, commodity and category of goods or services - including the Global Slavery Index - [globallslaveryindex.org](https://www.globallslaveryindex.org)

3. Take action to address the risks of modern slavery practices

During FY2020, we developed a three-year Modern Slavery Maturity Plan. The actions within the plan have been shaped by our assessment and prioritisation of our modern slavery risks. They are targeted at building our understanding and capabilities, improving our policies and processes, and enhancing engagement with our suppliers.

Key items completed in FY2020 are as follows:

Building our understanding and capabilities

We improved our understanding of, and capability to manage, modern slavery risks through:

- Engagement with industry peers and non-government organisations to understand leading practices and explore potential future opportunities for collaboration.
- Building management-level capability and engaging external advisors with experience in modern slavery compliance, supply chain risk management and human rights to train key management representatives.
- Assessing operations in high-risk countries. We commenced an internal review of human and labour rights related practices in our operations in high-risk countries, primarily where our LPG Pacific business operates.

Improving our policies and processes

We targeted the following improvements in our existing policies and processes:

- **Clear human rights expectations:** We reviewed and updated our Human Rights Policy to incorporate modern slavery related human rights and other human rights that are salient to our business activities. We continued the rollout of the Supplier Code to our goods and services suppliers and expanded the rollout to include our commodities counter parties.
- **Enhanced supply chain due diligence processes:** The Modern Slavery Risk Analysis (MSRA) Procedure has been developed to standardise our assessment of new suppliers. To increase the transparency of our supply chains we have developed and piloted a Supply Chain Traceability Tool (described in the case study on page 11);

- **Management and remediation of human rights incidents:** We updated and expanded our Incident Management Directive to include the need to explicitly identify human rights and modern slavery breaches. We developed guidance on remediation actions to support our people in meeting the commitments set out in our Human Rights Policy and other related policies.
- **Improved grievance mechanism:** We expanded the Origin ConcernLine to specifically reference human rights related concerns and consequently provide a primary grievance mechanism to support remediation processes.

Enhancing engagement with our suppliers

We set expectations with our suppliers and gathered further insight into our supply chain by:

- Continuing the rollout of our SAQ which has now been distributed to 690 key suppliers.
- Achieving >99 per cent acceptance of the Supplier Code from the suppliers that have completed the SAQ.
- Updating our standard contracts for goods and services to include obligations relating to the Supplier Code.

4. Review the effectiveness of our actions

During FY2020, we performed the following activities to assess the effectiveness in addressing the risk of modern slavery:

- We established a cross-functional Modern Slavery Working Group tasked with assessing and addressing risks of modern slavery practices across our operations and supply chain. Their work is reported to, and monitored by, Origin's Executive Leadership Team; and
- We commissioned a benchmark review of our responsible procurement practices, including a review of our Supplier Code and SAQ process. Recommendations for improvement have been included in our Modern Slavery Maturity Plan.

In addition to the above, we regularly review and assess the effectiveness of our policies, codes, standards and procedures as part of our Risk Management Framework.

Case Study – Increasing supply chain engagement and transparency



Our focus on regional and Indigenous procurement means that we engage a diverse range of suppliers to operate our business. We recognise that although 93 per cent of our direct suppliers are registered in Australia, often the source location of the goods, component parts and raw materials, is from overseas. To increase the transparency of these supply chains we have developed a Supply Chain Traceability (SCT) Tool. The SCT Tool is a standardised, systematic approach to mapping and analysing the supply chains of our suppliers.

We recently performed a pilot of the SCT Tool with one of our suppliers. We chose a workwear supplier for the pilot as this is one of our higher risk product categories.¹⁰ Piloting the SCT Tool required a combination of desktop research and supplier consultation to develop an understanding of the supplier’s supply chain structure, risks, controls and their processes and policies. Refer to the diagram for a summary of the supply chain tiers and controls identified through this activity.

As part of our ongoing assurance, we will continue to work with this supplier in FY2021 to:

- monitor the progress of the Tier 1 supplier’s supporting policy and procedure implementation; and
- monitor the progress of the Tier 2 wholesaler becoming a Better Cotton Initiative (BCI) member.

Enhanced engagement with our suppliers is helping us to develop a deeper understanding of the modern slavery risks in our supply chain. We have also gained insight into the level of support suppliers may need in assessing their risk to modern slavery type practices. We expect that the support required will vary depending on their organisational size, diversity of the goods and services they provide, and depth (number of tiers) of the supply chain.

Findings from the pilot are being used to improve the SCT Tool which will then be embedded into our supply chain due diligence processes.

As a result of this pilot, we were able to improve our understanding of the multiple tiers of the supply chain:

○ Tier 1

An Australian wholesaler with a responsible procurement policy in place

- Policies and procedures currently being drafted to further support responsible procurement
- Relies on Tier 2 international wholesaler to manage ethical sourcing of garments

○ Tier 2

An international wholesaler who is a member of Sedex, one of the world’s leading ethical trade service providers¹¹

- Responsible procurement assurance program in place with publicly reported results
- Currently joining the Better Cotton Initiative (BCI), a global not-for-profit and the largest cotton sustainability program in the world¹²

○ Tier 3

Clothing manufacturers (two brands) owned by Tier 2 international wholesaler and subject to the same responsible procurement assurance program

○ Tier 4

Fabric manufacturers subject to Sedex independent audits and bound to Tier 2 international wholesaler’s responsible procurement assurance program

○ Tier 5

Cotton growers and pickers are subject to Tier 2 supply chain processes and will be BCI approved in the future

¹⁰ Garments have been identified as one of the top five modern slavery risk categories for Australian imports, Walk Free Foundation Global Slavery Index 2018 https://downloads.globallslaveryindex.org/ephemeral/6_Importing-Risk-1593393518.pdf

¹¹ <https://www.sedex.com/>

¹² <https://bettercotton.org/>

Impacts of COVID-19 on our supply chain



In response to the COVID-19 pandemic, Origin has focused on safely maintaining energy supply and reassuring customers we will support those who have been financially affected.

To date there has been no material impact on Origin's energy supply operations, with customers continuing to receive reliable electricity, natural gas and LPG supply.

The majority of Origin's workforce has transitioned to working from home during the pandemic and only roles critical to maintaining energy supply remain at site, with appropriate safeguards in place.

We recognise that our suppliers may face commercial uncertainties due to the pandemic. To support our Australian small business suppliers, on 31 March 2020, we announced that for six months we will accelerate standard payment terms from 30 to 14 days from receipt of a valid tax invoice.

Timing of certain items planned for FY2020 in the Modern Slavery Maturity Plan and described in this statement were disrupted due to COVID-19 restrictions, however they were still completed during FY2020.

To manage potential supply disruption we analysed our supply base and identified 114 critical suppliers. Key risks identified included, factory shut-downs, reduced production capacity and logistics delays.

All actual or potential supply disruptions identified were assessed and appropriate mitigation measures put in place including, replanning work and ensuring sufficient alternative supply was available through sub-suppliers. During this time, we were able to substantially rely on existing critical suppliers and therefore not significantly increase modern slavery risk as a consequence of introducing new suppliers to our supply chain.

As part of our ongoing supplier due diligence work planned for FY2021, as outlined in the 'Looking ahead' section, we will continue to review how these disruptions may have increased the risk of modern slavery practices in our supply chain.

Please refer to our FY2020 Sustainability Report for more information regarding our response to Covid-19.

Looking ahead

We recognise that eradicating modern slavery requires dedication to make a positive difference to people's lives, in line with our purpose. Delivering on this undertaking will take a concerted effort by Origin, our suppliers, peers, supported through cross-industry collaborations.

Looking ahead, we plan to progress the following actions in FY2021 and beyond:

Building our understanding and capabilities

- Develop and deliver a broader training program for our people to increase their understanding and awareness of modern slavery risks in our operations and supply chain.
- Develop protocols relating to audits of suppliers where high exposure to the risks of modern slavery practices may exist, to enable deeper analysis and validation of supplier practices.
- Complete the review of human and labour rights practices in our operations in high-risk countries across the Pacific region.
- Expand our operations risk analysis to consider Origin's philanthropic activities.

Improving our processes

- Further embed supply chain due diligence processes to ensure modern slavery risks are considered, including implementation of our MSRA Procedure and improvements to the SCT Tool.
- Further updates to our grievance mechanism and remediation processes including our Human Rights Remediation Toolkit, Escalating a Concern Procedure and related **Whistleblower Policy** processes.
- Integrate our Supplier Code and SAQ process into our new ERP system.
- Continue to evolve our performance metrics to monitor the effectiveness of our actions.

Enhanced engagement with suppliers

- Engage with more suppliers in the highest risk profile groupings to more deeply assess exposure to modern slavery practices.
- Expand the rollout of our SCT Tool to targeted high-risk suppliers.
- Develop and rollout modern slavery and human rights training to selected suppliers.

Consultation and approval process

In performing the actions described throughout this Statement, consultation included engagement with:

- Origin's Modern Slavery Working Group, various levels of management and business unit representatives with oversight of suppliers and subsidiaries assessed as potentially more highly exposed to risks of modern slavery practices.
- Australia Pacific LNG representatives to outline Origin's supply chain due diligence approach and confirm alignment in preparing the Origin and Australia Pacific LNG Modern Slavery Statements for FY2020.
- Origin's Executive Leadership Team who have reviewed the outcomes of relevant assessments and endorsed the Modern Slavery Maturity Plan.

We expect to expand our consultation with other partly owned subsidiaries and joint venture partners in FY2021.

The Origin Board Risk Committee will retain oversight of our human rights and modern slavery risks through our Risk Management Framework.

Our Executive Leadership Team has also been involved in the compilation and endorsement of this Statement for approval by the Board. The Statement was approved by the Board and is signed by the Chief Executive Officer.

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