



Modern Slavery Statement 2022

This statement covers Essential Energy's ongoing commitment towards eradicating slavery from our supply chain and the communities we serve.

Reporting period: 2021-22

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Structure of this statement

Table 1 identifies the relevant headings in this Statement and how they align to Section 16 of the *Modern Slavery Act 2018* (Cth) (the Act) (Mandatory criteria for modern slavery statements).

> **Table 1. Alignment to Section 16 of the Modern Slavery Act**

Section within this document	Mandatory criteria requirements of Section 16 of the Act
About Essential Energy	(1) Identify the reporting entity; and (2) Describe the structure, operations and supply chains of the reporting entity; and (6) Describe the process of consultation with any entities that the reporting entity owns or controls.
Risk Assessment	(3) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.
Actions taken to assess and address risks of modern slavery practices	(4) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.
Assessing the effectiveness of actions	(5) Describe how the reporting entity assesses the effectiveness of such actions
Case studies	(7) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.
Future commitments	



Message from the Chair and Chief Executive Officer

This is the third Modern Slavery Statement produced by Essential Energy in compliance with the Modern Slavery Act 2018 (Cth) (the Act). It sets out the continuous improvement actions taken by Essential Energy to address modern slavery and human trafficking risks in our organisation and supply chain for the financial year ending 30 June 2022.

Essential Energy is committed to maintaining and improving systems and processes to avoid complicity in modern slavery or human rights violations related to our own operations, our supply chain, and our services. We understand that modern slavery can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, workplace abuse and human trafficking. In this statement, the terms 'modern slavery' and 'slavery and human trafficking' encompass these various forms of coerced labour. Essential Energy does not tolerate any forms of slavery and human trafficking in our business and supply chain.

We are committed to continuous improvement in our modern slavery risk management initiatives as we continue to build a deeper understanding of our supply chain and mitigate human rights and modern slavery risk areas. We are particularly proud of the work we are doing with our suppliers to identify and influence areas of risk within our supply chains. In this Statement we have outlined our progress during 2021-22 that demonstrates our ongoing commitment to improving the lives of people in the communities in which we operate.

This Statement was approved by the Board of Essential Energy on 13 December 2022.



Doug Halley
Chair



John Cleland
Chief Executive Officer



Acknowledgement of Country

Our depots and offices across regional New South Wales (NSW) are located on the country of 29 First Nations – from Wilyakali country on the plains of Far West NSW, to Ngarigo country in the high Snowy Mountains, Bundjalung country on the subtropical North Coast, and more First Nations across the diverse landscape that is regional, rural and remote NSW and parts of southern Queensland.

We acknowledge the Traditional Custodians of the lands on which our company is located and where we conduct our business, and we acknowledge all Aboriginal and Torres Strait Islander peoples across Australia. We pay our respects to ancestors and Elders, past, present and emerging. We are committed to honouring Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas, and their rich contribution to society.

About this statement

The submitting entity is Essential Energy which qualifies as a reporting entity under the *Modern Slavery Act 2018 (Cth)*. This Statement covers all entities within Essential Energy and reports on the state of operations, structure, governance framework and activities during the reporting period 30 June 2021 to 30 June 2022.

All dollar figures presented in this Statement are in Australian dollars unless otherwise indicated.

Summary of progress since last year

> **Table 2. Summary of our progress to address modern slavery during 2021-22**

Future commitment in 2020-21 Statement	Progress to 30 June 2022
Expanding our Assurance Program to reach more than 90 per cent of total supplier spend	Through a combination of third-party surveys and supplier self-assurance qualification surveys, we attained 94 per cent of addressable spend.
Monitoring employee awareness and education session completion rates	Over 2,400 employees have completed a Modern Slavery Awareness training module.
Monitoring supplier survey completion rates	293 suppliers have completed the survey, up from 220 suppliers in 2021.
Prioritising risk mitigation activities	A supply chain risk mapping review was conducted of 60 key Tier 1 suppliers with overseas supply chains. Updated standard purchase order terms and conditions so that every good or service procured has reference to modern slavery legislative obligations.
Continuing Energy Procurement Supply Association (EPSA) consortium engagement on future survey and platform improvements, including potential options for including additional supply chain tiers in assurance surveys	Participation continued during 2021-22.
Building modern slavery supplier assurance intelligence results into supplier relationship management processes for risk reduction.	Included in the supply chain risk mapping review (above), from which five key supplier engagements were conducted (refer to case studies in this statement).



About Essential Energy

Essential Energy is a State Owned Corporation established under the *Energy Services Corporations Act 1995* (NSW) and the *State Owned Corporations Act 1989* (NSW) to provide services critical to the economy and infrastructure for NSW. We operate and maintain one of Australia's largest electricity networks, across 95 per cent of NSW and parts of southern Queensland.

Serving more than 880,000 customers – homes, hospitals, schools, businesses and community services – Essential Energy is an economic enabler for regional, rural and remote communities. We aim to continuously improve safety performance for employees, contractors and the community, along with the reliability, security and cost efficiency of the network, and to reduce our environmental impact where efficient to do so. We also strive to maintain downward pressure on customers' network charges and deliver an acceptable return on capital employed.

Essential Energy is one of the largest employers in regional NSW, with approximately 3,100 employees based at depots and offices in 100 communities across the state.

In the Far West of NSW, Essential Energy (trading as Essential Water) delivers secure water supply to 10,500 customers in Broken Hill, Menindee, Silverton and Sunset Strip, as well as rural customers. Reliable sewerage services are provided to 9,600 customers in Broken Hill.

Essential Water is not a separate legal entity and Essential Energy does not own or control any other entities with which a joint statement or process of consultation would be conducted under Section 16 of the Act. For this statement Essential Energy identifies as being the principal governing body and reporting entity as per definitions in the Act.

Essential Energy spends approximately \$500 million annually across more than 2,000 direct suppliers. We procure a diverse range of goods and services to support our core business of operating and maintaining the network. Our key areas of expenditure are shown in Table 3.

> **Table 3. Key spend categories**

Expenditure category	Typical goods and services
Network services	<ul style="list-style-type: none">• Vegetation management services• Construction and civil works• Network inspection and maintenance• Meter reading• Plant and equipment hire.
Network equipment	<ul style="list-style-type: none">• Transformers and switchgear• Poles, cables and fittings• Streetlighting equipment.
Fleet and property	<ul style="list-style-type: none">• Commercial vehicles, parts and accessories• Fuel• Property maintenance services and equipment• Waste management services• Cleaning services.
Information communications and technology	<ul style="list-style-type: none">• IT software and services• IT hardware• Telecommunications services.
Corporate services and equipment	<ul style="list-style-type: none">• Labour services• Safety equipment and work wear• Stationery and corporate equipment.

Risk assessment

A baseline risk assessment of Essential Energy's operations was conducted in 2020 and has since been reviewed in 2021 and 2022. Essential Energy's operations are consistent with prior years and remain in Australia, largely within NSW. No areas of high risk have been identified in Essential Energy's direct operations.

Where goods and services are provided by other organisations rather than directly through Essential Energy's operations, these continue to be assessed and managed to minimise modern slavery risks.

We are continuing to refine our supply chain data as we conduct deeper dives into key suppliers and seek to understand their 'origins of manufacturing'. The reason for this is that our data indicates a very high percentage of our spend is with suppliers registered in Australia, above 90 per cent, but we recognise this does not tell the full story as many suppliers across both goods and services categories may be multinational subsidiaries that have secondary supply chains that extend offshore. Accordingly, we are continually improving data and investigating secondary (Tier 2) suppliers, which is outlined in the risk mapping assessment further in this statement.

Actions taken to assess and address risks of modern slavery practices

Essential Energy is now on its third rotation of our continuous improvement framework of actions for compliance with the Act. Foundations for our approach to modern slavery are outlined below, consistent with previous years:

Governance

Essential Energy is committed to high standards of corporate governance. Our board, executive and relevant committees provide the direction and leadership to implement appropriate levels of governance across our organisation consistent with Essential Energy's objectives. This includes ensuring that in dealing with suppliers, our decisions and actions are based on transparency, integrity, responsibility and performance, which promotes the long-term sustainability and ongoing success of our business.

In relation to our suppliers, all are required to comply with our Statement of Business Ethics and the policies and standards on ethical business practices, safety and the environment. Suppliers are expected to ensure that all employees and contractors engaged within their business are legally entitled to work and that no forms of slavery or human trafficking are evident in the manufacturing and/or provision of products and services to Essential Energy.

Modern slavery updates have been provided to the board, board committees and executives on an ongoing basis.

Policies and procedures

All relevant policies and procedures account for identifying and managing the risks associated with slavery and human trafficking. These documents include:

- > [Code of Conduct](#)
- > [Statement of Business Ethics](#)
- > Procurement Policy
- > Building a Respectful Workplace Procedure.

Our Code of Conduct outlines our corporate values and ethical principles and sets out the behaviours expected of all employees, contractors and suppliers. Our Statement of Business Ethics reflects our position on slavery and human trafficking.

Essential Energy's Code of Conduct and Statement of Business Ethics set out channels through which individuals can report wrongdoing regarding modern slavery or any other compliance concerns. Processes for investigating reported wrongdoing are also formalised and in place. Essential Energy has the industry leading product called 'Whispli'; a secure and confidential whistleblowing platform used by many of Australia's companies to enable their employees, contractors, suppliers, and the public to report misconduct or concerns they may have in relation to the operation of the company.

Essential Energy's Procurement Policy addresses commercial considerations, the mitigation of risk, compliance with regulatory requirements and guidelines and the requirement to act and be seen to act fairly, ethically, and responsibly. It clarifies our businesses objectives, values and goals for market engagement. All procurement procedures, forms and tools including market engagement templates clearly articulate our position.

Assurance and due diligence

Essential Energy's Standard Terms and Conditions of Purchase are clear regarding compliance requirements and governed for adherence accordingly.

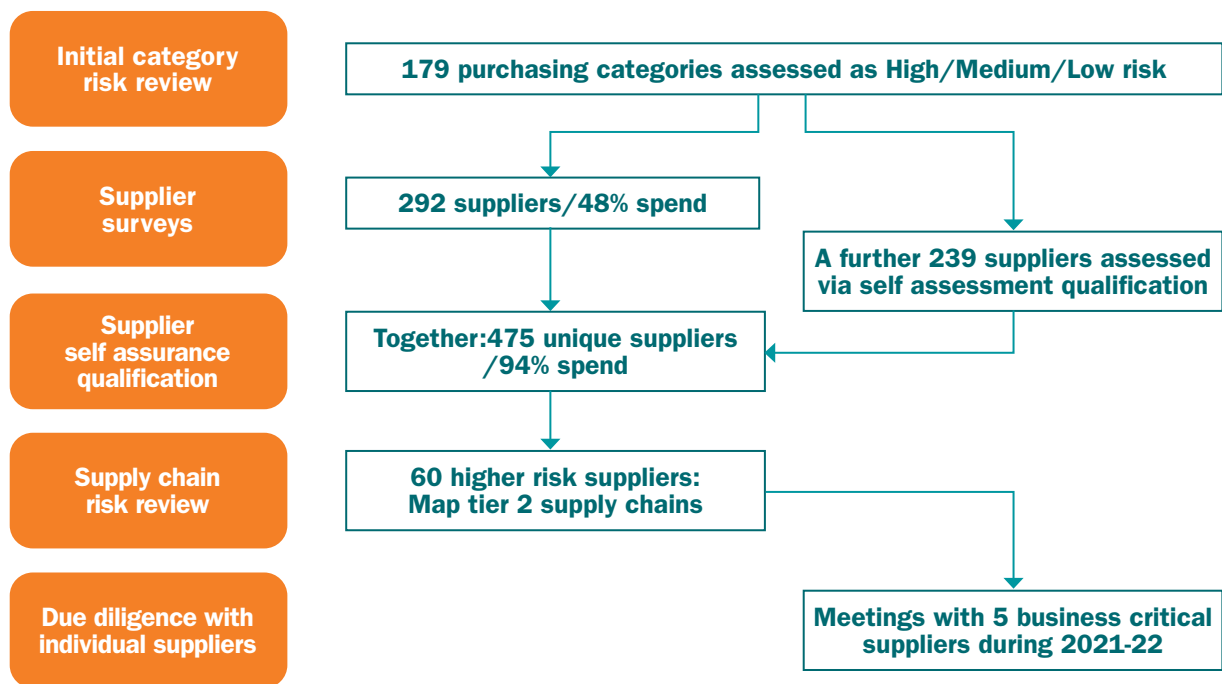
The supplier assurance survey created by the Energy Procurement Supply Association (EPSA) consortium and deployed through Informed 365 improves the visibility of risk in our supply chain. Survey completion rates are monitored, and follow-up communications are promoting an increase in survey activity. Ongoing due diligence will be facilitated by an annual refresh of surveys as well as periodic adjustments to cater for supplier churn. Existing supplier relationship channels will be engaged where appropriate for continuous improvement activities and effort shall be prioritised based on areas of risk identified in this statement.

In the event that a case of slavery or human trafficking is found to be occurring within our direct supply chain, we will engage directly with the supplier to remedy the issue. We are committed to working with our suppliers to understand and resolve issues, ensuring a balanced and pragmatic approach is adopted and decisions made are consistent with Essential Energy's values and ethics.

Mechanisms are in place for employees and third parties to report suspected or detected illegal activities or breaches of policy, including for non-conformance to our Code of Conduct and Statement of Business Ethics. This includes anonymous reporting options for employees and third parties to communicate any concerns of slavery or human trafficking. Reports received will be assessed for investigation and managed in a systematic, fair, timely and transparent manner. Reports received may also be referred by Essential Energy to law enforcement agencies such as the Australian Federal Police, or another relevant agency where appropriate based on the nature of the report.

Building on the foundations above, a summary of actions undertaken during 2021-22 to improve effectiveness to identify and address modern slavery risks within our operations and supply chain is illustrated in Figure 1 and described within sections for 'Continued industry collaboration', 'Supplier assurance qualification' and 'Key supply chain mapping'.

> **Figure 1: Supplier risk assessment and due diligence approach from 2020 to date:**



Continued industry collaboration

During 2021-22, Essential Energy continued its membership of the Energy Procurement Supply Association (EPSA) consortium for the additional benefit of synergistic industry-based risk assessment and assurance. EPSA use the software as a solution (SaaS) product provided by a vendor, Informed 365, through which the consortium's survey initiatives are launched. The survey developed by EPSA is designed to capture key information from suppliers which feeds into dashboard style risk metrics. Each consortium member is then able to use this information to trigger continuous improvement initiatives.

Supplier assurance qualification

A data driven approach to supplier assurance surveys was developed in 2020-21. Building on this, Essential Energy has extended assurance qualifications to more than 400 suppliers, which collectively represent almost 95 per cent of our addressable third party spend. This exceeded the target set from the Board last year of 90 per cent of addressable spend by June 2022. Modern slavery assurance qualifications have been captured in our Enterprise Resource Planning (ERP) system, as a robust repository for supplier qualifications which provides a baseline for ongoing tracking and updating as our supplier base changes over time.

Key supply chain mapping

Essential Energy undertook a 'risk-mapping' study of 60 of our Tier 1 suppliers within specific spend categories such as network equipment, IT hardware and corporate supplies and consumables. These suppliers were selected for review as they represent critical suppliers of equipment to our operations. While they are all located within Australia, their supply chains extend offshore, based on the risk assessment previously conducted of key categories in 2020-21.

This supplier study in 2021-22 concluded that there is no evidence of modern slavery related breaches or lawsuits in any of the targeted 60 suppliers within the public domain or secondary databases, and that no major critical events related to modern slavery were identified through a third-party supply chain risk assessment tool. Nevertheless, two out of 60 suppliers recorded adverse media appearances which were subsequently reviewed and determined as not requiring further action.

Follow up actions from the supply chain mapping study, to meet with several of the suppliers who participated, are outlined in the case studies within this statement.

Awareness and education

As part of our framework of actions to comply with the Act, modern slavery awareness and education modules have been developed for our employees and suppliers. The items covered by the modules include, but are not limited to:

- Background to the Act
- Information about what constitutes modern slavery and the forms it can take
- How modern slavery practices can impact our supply chain
- Examples of modern slavery
- What to do if slavery or human trafficking is suspected or detected.

To June 2022, over 2,400 employees have completed a Modern Slavery Awareness training module and this is now a standard for new employees joining Essential Energy.

The supplier module is located on the Essential Energy website.



Assessing the effectiveness of our actions

Our modern slavery risk management action plan and due diligence processes will continue to be reviewed regularly as part of our corporate sustainability and risk management reviews.

Whilst our maturity continues to grow in assessing our supply chain for risks, our year-on-year supplier surveys completed to date have not detected non-compliance to United Nations International Labour Organisation (ILO) Conventions or human rights breaches (including modern slavery). No grievances or issues relating to modern slavery were made via the self-reporting mechanisms, via our internal corruption hotline or ethics inbox during 2021-22.

The effectiveness of our actions is assessed by ongoing monitoring and analysis of our performance against our four key focus areas – see Figure 2, and indicators of effectiveness in Table 4.

> **Figure 2. Modern slavery key focus areas**



> **Table 4. Effectiveness indicators of our actions**

Focus Areas	Actions / Controls	Measures of Effectiveness
Modern slavery governance	<ul style="list-style-type: none"> • Communication of Supplier Self Assurance status to Sustainability Steering Committee and to the Board • Assessment of suppliers • Whistle-blower communication lines availability • Code of Conduct (employees) • Statement of Business Ethics (suppliers) • Modern Slavery Statement • Annual review of the improvement plan and key milestones. 	<ul style="list-style-type: none"> • Percentage of addressable spend with suppliers which have been assessed or completed self-assurance qualification • Number of high-risk potential supplier engagement meetings held • Number of human rights or modern slavery violations or incidents identified or reported • Number of Board engagements and awareness training sessions conducted • Modern Slavery Statement compliance obligations completed annually.
Training and awareness	<ul style="list-style-type: none"> • Rollout of Modern Slavery Awareness training as an online learning module for Essential Energy employees • Modern slavery information/expectations pack available on the Essential Energy website. 	<ul style="list-style-type: none"> • Number of employees trained on modern slavery requirements • Number of new employees trained on modern slavery and Code of Conduct as a part of the onboarding process.
Risk assessment and due diligence	<ul style="list-style-type: none"> • Spend analysis and risk by key products and services • Deep dive spend analysis by manufacturing country of origin • Identify and assess risks • Risk prioritisation by good/service/geography • Tier 2 supplier mapping. 	<ul style="list-style-type: none"> • Assessment of modern slavery risks amongst key suppliers • Number of highest risk suppliers invited to complete deep dive assessments • Risks analysed on the basis of geographic, demographic, business and entity parameters • Number of investigated cases of potential risks
Stakeholder engagement and collaboration – procurement and supply chain	<ul style="list-style-type: none"> • Engage with stakeholders through regular face-to-face meetings • Tier 1 supplier engagement. 	<ul style="list-style-type: none"> • Number of supplier engagement meetings held • Number of supplier contracts with modern slavery clauses • Number of potential human rights incidents or violations investigated • Number of corrective actions taken to address potential violations of modern slavery.

Case studies

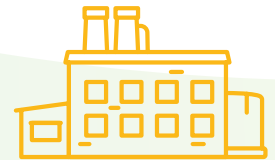
As outlined in the actions, a supply chain mapping study was performed during 2021-22 to identify Tier 2 suppliers and locations for key suppliers of network equipment, IT hardware and corporate supplies. The methodology was via questionnaires to identify Tier 2 suppliers within each category of spend. Supply chains of 48 suppliers were assessed, which identified Tier 2 suppliers across 43 countries. Five key suppliers were identified from this process as representing potential risk that warranted a deeper dive into their respective supply chains. The area of potential risk being that the sub-components may have been manufactured in locations within China that also had previously been listed as 'hot spots' for enslaved labour.

To address the potential risk, engagement meetings were conducted with five key suppliers of network transmission equipment that participated in the supply chain mapping. As each supplier had also been surveyed in the previous year via the EPSA self-assessment questionnaire, these meetings were an opportunity to follow up on progress. Meetings were held with relevant Essential Energy procurement, supply chain and contract managers with a purpose of:

- > sharing good practices and identifying opportunities for improvement
- > establishing what each supplier is doing to ensure their supply chains are free of modern slavery
- > identifying opportunities for improvement for both parties.

Highlights of these discussions are outlined in the below case studies.

1. Electrical switchgear manufacturer



As part of a multinational group, this supplier needs to comply with group policies on modern slavery. It has updated its corporate social responsibility guidelines and requested business partners to submit compliance forms annually. A human rights self-assessment questionnaire has been implemented on a global basis. Tier 1 and 2 suppliers to this organisation are in the process of completing self-assessment questionnaires, in accordance with group guidance. These are directed towards understanding and compliance within their supply chains.

A future action is to implement an online learning module of human rights policy for employees. The overall risk of modern slavery in the Australian entity is considered to be low, as most suppliers are based in Australia – working conditions at these sites are governed by Australian law and the Fair Work Commission. Established overseas suppliers in China, Japan and South Korea are also used. Factory audits of these suppliers are planned pending COVID-19 restrictions.

2. Cable producer



This supplier noted there is an increased focus on sustainability with their Australian operations over recent years and they are leveraging work completed by other regions with the group which includes overseas entities. Their current efforts are directed towards compliance with modern slavery legislation through their supply chain, both upstream and downstream. This has involved sending questionnaires to their suppliers and customers (distributors and wholesalers of their products) and preparing a register of those that have responded. A questionnaire has been incorporated into their new supplier onboarding processes. This includes using third party providers to assess supply chain risk and review of negative reports through public access information and the introduction of modern slavery legislation compliance requirements into their contract forms for new contracts. They believe there is a low risk of modern slavery in their supply chain as they have long standing relationships with mature and capital-intensive suppliers. As next steps, they are currently formulating a plan to introduce supplier audits as part of a regional initiative with other group operations, given there are a number of common suppliers.

3. Electrical technology provider



This global organisation has mature processes and policies for the management of modern slavery, including compliance with the Act. They have undertaken an assessment of their operations to better understand their supply chain, the potential risks, as well as the actions we've taken and are taking in support of the objectives of the Act. In acting responsibly to support economic, environmental and social progress they have expressed the same expectations of their customers and supply chain.

They perform risk assessments on their Tier 1 and 2 suppliers by internal staff. To date, they have not yet found any issues with modern slavery. All suppliers must comply with a business conduct guideline that is strictly enforced and monitored regularly. Accordingly, they believe their overall risk is low.

4. Electrical sensors and connections



This supplier performs the majority of manufacturing in-house, which is audited and monitored using internal controls. They perform assessments of all third-party vendors where they are required to provide an annual statement against modern slavery. In countries such as India and China, where they operate, local employees audit these statements. COVID-19 has posed some issues with auditing over the past two to three years and identifying what third party vendors are used for Essential Energy supplied products. An example of their audit documentation of an external third party that was done during a factory visit has been shared with Essential Energy. All suppliers are required to comply with their guide to supplier social responsibility. With regard to in-house training, all employees are required to attend annual global ethical training. Their self-analysis scores their risk as low, as a result of their auditing processes.

5. Electrical transformers



Before COVID-19, this supplier periodically audited key vendors to assess manufacturing and quality practices and identify risk, including for modern slavery. Since the onset of COVID-19, they have conducted desk-top audits and virtual plant inspections when onboarding new suppliers. Their vendor onboarding process includes confirmation from vendors that they comply with the Act and the requirements are included in their purchase order terms and conditions.

They use a third-party certifying agency to audit vendors in high-risk geographies. At this stage global multi-nationals are generally not audited, and compliance is accepted based on reputation. Periodic vendor audits are intended to re-commence during 2022, starting with high-risk vendors.

They consider the overall level of modern slavery risk in their supply chains as low as they now source components mainly from western Europe. They are considering third party service providers to enhance supplier risk questionnaires and supply chain risk alerts.

Future commitments

A roadmap of our progress to date with proposed plans for the next two years is summarised in Table 5.

> **Table 5. Progress to date and plans for the coming two years**

2019-20	2020-21	2021-22	2022-23	2023-24
<ul style="list-style-type: none"> • First Modern Slavery Statement submitted to the Australian Government, outlining progress in 2019-20 • Conducted risk assessment of supply chains • Updated policies and procedures for managing modern slavery risks • Included modern slavery information in Code of Conduct • Included modern slavery reference in Statement of Business Ethics • Included modern slavery references in Procurement Policy and Guidelines • Completed modern slavery awareness training for 183 key employees • Conducted a supplier survey covering 35% of total spend – no violations of human rights discovered • Annual review of modern slavery compliance performance. 	<ul style="list-style-type: none"> • Joined Energy Procurement Supply Association (EPSA) • Initiated supplier assurance surveys to 90% of our suppliers by spend • Published a Modern Slavery Awareness Pack for suppliers and posted on website • Expanded modern slavery awareness online training to include 1300 employees • Included anti-modern slavery clauses within supplier contracts in the ERP system • No human rights breaches were reported in our supply base during 2020-21 • Annual review of modern slavery compliance performance • Templates for purchase order terms amended to include compliance to modern slavery law. 	<ul style="list-style-type: none"> • Total of 615 suppliers engaged through the EPSA Informed365 supplier assurance survey • 94% of our supply base addressable spend assurance surveyed for modern slavery • 60 key suppliers subjected an independent assessment of their respective supply chains to assess 'origins of manufacturing' for higher risk countries • Five key material supplier relationship meetings conducted • Continued employee awareness and education. • No human rights breaches were reported in our supply base during 2021-22. • Annual review of modern slavery compliance performance. 	<ul style="list-style-type: none"> • Consider engagement of a third party vendor to monitor financial, environmental, social, governance, cyber-security and reputational risks of our top 250 suppliers • Review and maintain EPSA self assessment questionnaire response from 95% of addressable spend • Evaluate learnings from supplier engagement meetings and identifying potential actions for continuous improvement • Design a standard template for future supplier engagement meetings • Tabulate a category-wide risk matrix based on source location, approximate spend and potential forms of modern slavery • Compile case studies for due diligence and remediation (if applicable) in the process of identifying, preventing or mitigating adverse modern slavery practices within suppliers • Annual review of modern slavery compliance performance. 	<ul style="list-style-type: none"> • Design and implement a strategic framework for improving workplace practices to maintain a responsible and transparent supply chain • Design and implement a strategic framework for stakeholder engagement, to increase leverage with all stakeholders (employees and all business relationships within the supply chain) • Annual review of modern slavery compliance performance.

During 2022-23 we will focus on the following key activities:

- > Maintain supplier assessment qualifications so that 95 per cent or more of our addressable supplier spend is with suppliers that have responded to questionnaires to acknowledge their responsibilities in identifying, reporting and acting to eliminate modern slavery
- > Continue to monitor employee awareness and education session completion rates
- > Monitor supplier surveys and focus on high-risk flags
- > Prioritise risk mitigation activities
- > Continue EPSA consortium engagement on future survey and platform improvements, including potential options for including additional supply chain tiers in assurance surveys
- > Extend risk and adverse events/media monitoring for key/high risk suppliers
- > Continue targeted supplier interviews and meetings to share understandings, expectations and actions – both underway and proposed to address modern slavery in our supply chain.