

Modern Slavery Statement

2020

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MESSAGE FROM OUR CEO

At ActewAGL we pride ourselves on conducting our business ethically and with integrity. Any form of modern slavery is unacceptable and we are committed to ensuring that modern slavery does not take place in any part of our business or supply chains. To do this we will continually review our procurement processes and maintain effective systems and controls to ensure we fulfill our obligation and responsibility to help eradicate modern slavery.

In producing our first Modern Slavery Statement, ActewAGL has taken significant steps to prevent, detect and respond to slavery and human trafficking within our business and throughout our supply chain. We recognise this is just the start and will continue to be a major focus for our organisation.

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

John Knox
Chief Executive Officer, ActewAGL
February 2021



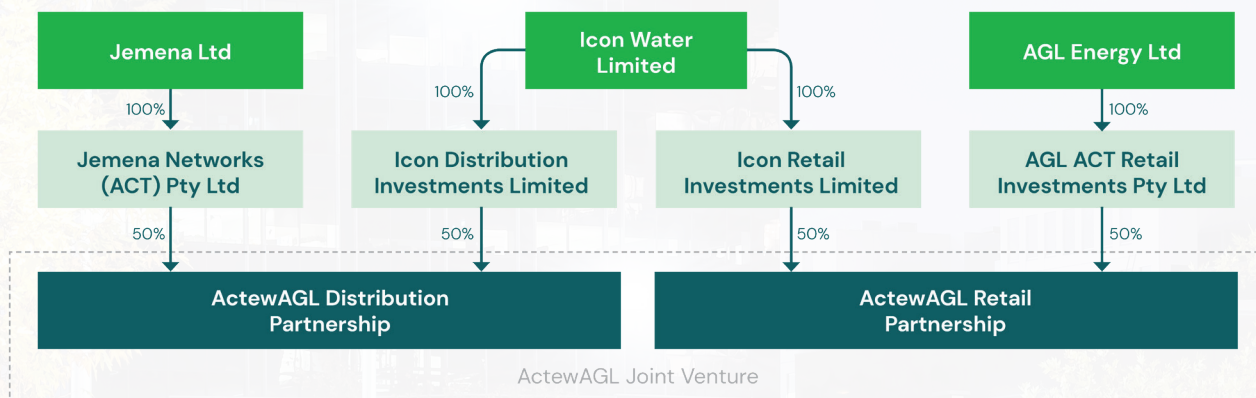
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ABOUT ACTEWAGL

ActewAGL was set up in October 2000 when the Australian Gas Light Company (AGL) and Icon Water Limited (formerly ACTEW Corporation), an ACT Government owned corporation, entered into Australia's first utility joint venture. Today ActewAGL is made up of two partnerships:

- ActewAGL Retail (ABN 46 221 314 841) is owned 50 percent each by Icon Water Limited and AGL Energy Ltd via subsidiary companies. ActewAGL Retail is an electricity and gas retailer within the ACT and parts of NSW.
- ActewAGL Distribution (ABN 76 670 568 688) is owned 50 percent each by Icon Water Limited and Jemena Ltd via subsidiary companies. On 1 January 2018, the part of ActewAGL Distribution that operates and maintains the ACT electricity and gas network changed its name to Evoenergy.



We employ 700 people in the Canberra region, with our offices located in the ACT. We recognise the decisions we make have a social and environmental impact on our business, customers and suppliers. We are committed to understanding and minimising the social and environmental consequences of our business operations.

OUR SUPPLY CHAIN

ActewAGL has a diverse supply chain with suppliers across many industries and services. Our purchased goods and services range from large electrical infrastructure, field services, corporate services, IT and supporting goods.

An external analysis of ActewAGL's Supply chain was conducted in FY20 to identify potential modern slavery risks.

The following were considered when undertaking this analysis:

- Geographic – suppliers country of operation and the prevalence of modern slavery
- Sector and industry – categories of goods and services purchased

The analysis found no high risk of modern slavery within our supply chain.

Key facts on our supply chain:



520
suppliers



\$265m
annual spend



99%*
of spend with
Australian-based
suppliers



1%
of spend with
international
suppliers

The 1% of international spend was in countries that have medium to low rankings in prevalence and vulnerability to modern slavery. Goods purchased by ActewAGL with the highest risk of modern slavery include apparel clothing and accessories (including safety equipment) and electronics.

Supplier Code of Conduct

All contracts ActewAGL have entered into since October 2019 include specific anti-slavery clauses.

To address existing vendors and contracts, a Supplier Code of Conduct was introduced in FY20 and requires ActewAGL's Suppliers, and their employees, agents, suppliers and sub-contractors to respect and adhere to ActewAGL's Code of Conduct when conducting business with ActewAGL.

We expect all of ActewAGL's Suppliers to comply with the Code and spirit of all laws and regulations that affect business conducted with ActewAGL. The ActewAGL Code of Conduct provides labour and safety standards in relation to compensation, working hours, freedom from harassment, security and working environment. All vendors with spend greater than \$50,000 have been issued the Supplier Code of Conduct.

The Supplier Code of Conduct is available on [our website](#).

* From analysis of Supplier master file which records the location of suppliers Registered office as opposed to the location of manufacture

OUR EMPLOYMENT PRACTICES

ActewAGL embraces the core areas outlined in the UN Global Compact of human rights, labor standards and the environment and anti-corruption.

Our major focus is on human rights, workplace health and safety, environmental management, materiality, supplier management and modern slavery. ActewAGL is committed to building a diverse workforce where employees' individual differences and attributes are respected and valued.

We are committed to our staff and ensuring their physical and mental health. We do not tolerate discrimination, unsafe work practices, fraudulent behaviour, and other inappropriate behaviour. ActewAGL requires employees to align their behaviour and work practices with our Code of Conduct and policies and procedures.

ActewAGL conducted a full review of our policies and procedures, incorporating changes to ensure Modern Slavery was addressed.

Our policies and procedures which assist in managing sustainability and human rights include the following:

Employee Code of Conduct

This Code demonstrates ActewAGL's commitment to employees and employees' commitment to ActewAGL. It provides guidelines to assist employees to make the right choices when it comes to our culture, customers, business and reputation. [The Code of Conduct](#) also ensures employees adhere to our relevant corporate policies and procedures, follow established protocols and comply with all relevant legislation, codes and standards covering ActewAGL's operations.

People Policy

Our People Policy provides direction and documents ActewAGL's commitment to our employees in establishing a safe, fair, respectful, diverse and flexible environment where people are proud and engaged.

This policy outlines that ActewAGL:

- is committed to the success of all our employees
- treats all people with respect, acts with integrity, honesty and openness
- makes employment decisions fairly
- values diversity, supports flexibility and promotes an inclusive workplace
- rewards in a fair and equitable manner
- investigates workplace complaints

Whistleblower Procedure

This procedure provides ActewAGL employees and non-employees an avenue to report suspected and actual workplace misconduct. It supports the disclosure and investigation of wrongful or illegal behaviour, including fraud and corruption, and modern slavery offences. It also provides protection to whistle blowers to encourage the disclosure of information related to the aforementioned wrongful or illegal behaviour.

A disclosure can be made by phoning **1800 233 285** or emailing actewagl@deloittedigital.com

MANAGING MODERN SLAVERY RISKS

As a result of an internal review of our policies and supply chain, initiatives were introduced to reduce the likelihood of modern slavery occurring in our supply chain. We are establishing working practices that enable us to monitor and reduce modern slavery risk within our business and supply chains.

Key actions we have undertaken in FY20 include:

- Updated corporate policies and procedures to address modern slavery, including our People Policy and Whistleblower Procedure.
- Provided training on modern slavery to all employees. This training is mandatory and will be refreshed bi-annually. Last financial year, 94.1% of employees completed their training.
- Potential high-risk suppliers in our review were sent communication asking them to confirm their companies position on modern slavery and actions they are taking in their own supply chains.
- Inclusion of an Anti-slavery clauses in Supplier Contracts.
- Inclusion of modern slavery audits in our Internal Audit Program. Vendor contracts are reviewed to ensure adherence and any omissions are corrected immediately with the supplier.
- Supplier Code of Conduct introduced and must be agreed to by all new and existing suppliers of ActewAGL. Through this code, ActewAGL reserves the right to verify supplier's compliance with the Code. If it is found that a supplier does not comply, ActewAGL reserves the right to demand corrective measures or to terminate the business relationship. All vendors with annual spend greater than \$50,000 have been issued the ActewAGL Supplier Code of Conduct.

ASSESSING OUR EFFECTIVENESS

To ensure our continued satisfaction of mitigating Modern Slavery risks, we will:



Embed **Modern Slavery e-learning** as part of our staff Induction process



Ensure all staff undertake **Modern Slavery refresher training** bi-annually



Provide **up-to-date factsheets and resources** in relation to Modern Slavery on our intranet



Audit vendor contracts on an annual basis as part of our Internal Audit Compliance Program

TAKING ACTION

ActewAGL encourages anyone (including employees, agents, consultants, contractors or representatives) to report in good faith any concerns about potential violation of legal or regulatory requirements involving ActewAGL or any of its suppliers in its supply chain, especially in regards to the risks of modern slavery.

ActewAGL employees should feel confident that any reports of alleged violations or identification of modern slavery risks, will be dealt with on a confidential basis and in accordance with ActewAGL's Code of Conduct, People Policy and Whistleblower Procedure.

OUR FUTURE COMMITMENT

ActewAGL recognises that eliminating modern slavery within our business and supply chain requires an ongoing commitment. In 2020–2021, we will continue to collaborate with internal and external stakeholders to address our modern slavery risks.

We will focus on:

- Engaging with employees and business partners to discuss modern slavery and related risks
- Continuing to work with our suppliers to ensure they are focused on modern slavery compliance and preventing it within their supply chains
- Continuing to audit our internal practices

ActewAGL