United Energy

Modern Slavery Statement 2024



Acknowledgement of Country

United Energy (UE) acknowledges and respects the Traditional Owners as the original custodians of the lands and waters that our network covers; lands First Peoples have occupied for tens of thousands of years.

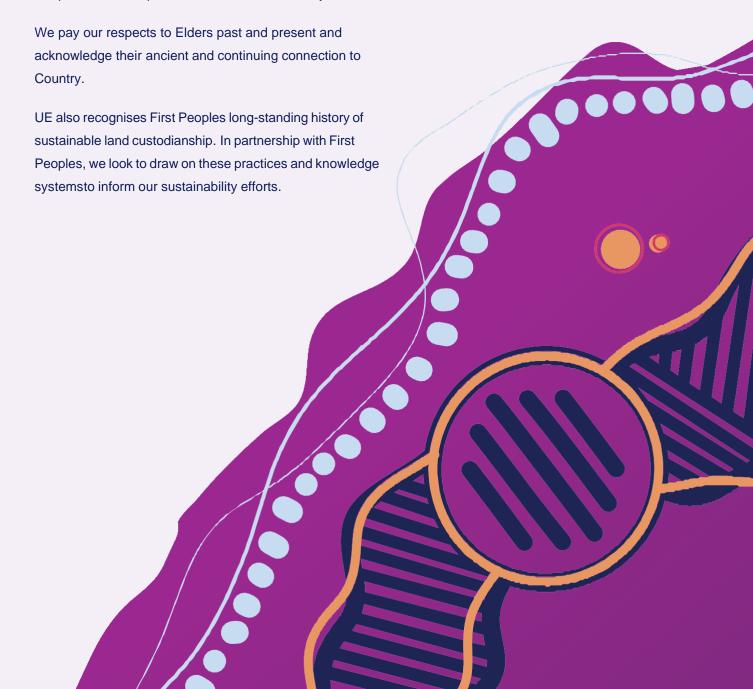


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Leadership message

This is the fifth Modern Slavery Statement from United Energy. It highlights our progress in 2024 towards upholding responsible business practices that integrate human rights considerations into our supply chain management and organisational decision-making.

Managing risk remains a core element of our vision of affordable, reliable and safe electricity supply, while also empowering customer choices and delivering for communities and the environment. The safety of our people and the communities we serve continues to underpin our policies, systems, and processes. We recognise that our responsibilities extend beyond our direct operations to include the third parties who supply us with goods and services essential to delivering energy to Victorians.

Our operations encompass a diverse range of activities, from maintaining poles and wires and managing vegetation and supporting customers in connecting clean energy technologies. This broad scope relies on the contributions of over 386 active suppliers, whose products and services enable us to fulfill our vision.

We are committed to selecting suppliers who align with our values and consider factors beyond price, including safety performance, labour practices, and community support. We will not tolerate any form of modern slavery in our business or knowingly engage with anyone who does. This commitment is reinforced through our corporate policies, procedures, and organisational culture.

Over the past year, we have strengthened our actions to address modern slavery risks. These include conducting risk assessments of our supply categories and suppliers, completed comprehensive modern slavery audits, establishing our Social & Sustainable Procurement Framework and expanding training for employees. In 2024, we continued to deliver targeted training to help employees understand modern slavery, recognise examples, and utilise reporting processes for potential instances.

In 2024, we deepened our focus on extended due diligence, examining not only our immediate suppliers but also their supply chains, through comprehensive audits of six of our strategic suppliers. We aim to extend this into 2025 and beyond, ensuring that our supply network aligns with societal expectations regarding modern slavery prevention.

We continue to foster a culture where employees feel confident speaking up when they encounter practices that do not align with societal expectations. Our Whistleblower Program remains a vital, anonymous avenue for employees, contractors, and suppliers to report inappropriate or illegal behaviour, including concerns related to modern slavery.

Looking ahead, we remain committed to minimising modern slavery risks. Guided by our Social & Sustainable Procurement Framework, we will work collaboratively with industry peers, enhance training programs, and conduct annual risk assessments of our operations and supply chains. This ongoing improvement is central to our efforts, and we look forward to sharing our progress in our future statements.

Peter Lowe

Tim Rourke

Chairman

Chief Executive Officer

1 About Us

United Energy Distribution Holdings Pty Ltd is the holding company for the United Energy group (United Energy, or UE), which owns and operates the United Energy electricity distribution network.

CK Infrastructure Holdings Ltd and related entities owns 66% of United Energy, with the balance owned by SGSP (Australia) Assets Pty Ltd.

1.1 Our business

United Energy (UE) is a regulated distribution network service provider that supplies electricity to Melbourne's east and southeast suburbs and the Mornington Peninsula.

Households represent 90 per cent of our customers, but we also support small, commercial and industrial businesses, including the peninsula's popular tourism industry.



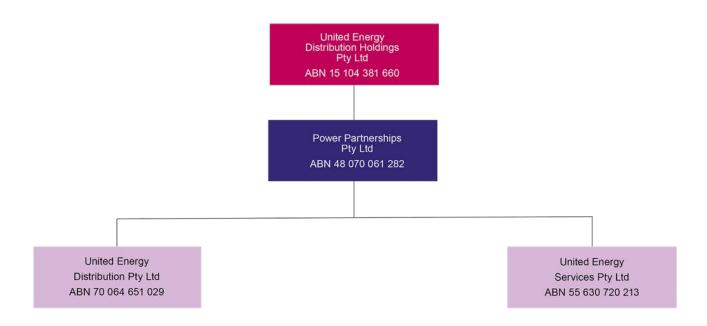


Our work is led by a team of skilled professionals that are based in our corporate offices in Glen Waverley and Melbourne CBD. Our people are responsible for network control, engineering and network management, while maintenance and fault response field services are delivered through a partnership with Zinfra, a national leader in the utility infrastructure sector.

Operational services are delivered from depots in Keysborough, Mornington and Glen Waverley.

1.2 Corporate Structure and reporting entities

This modern slavery statement has been prepared and published in accordance with the *Modern Slavery Act* 2018 (Cth) for the calendar year ended 31 December 2024. It is a joint statement made on behalf of, and approved by the Boards of the following reporting entities:



This statement covers the activities of these entities. All references to our, we and us within this statement refer to United Energy Distribution Holdings Pty Ltd and the entities it owns and controls.

1.3 Board management and structure

Our Board of Directors oversees our strategic direction and performance and provides support to our Executive Management Team. The Board consists of five directors: two independent directors including the Chair, two shareholder appointed directors and the Chief Executive Officer. The following committees have also been established to assist with the responsibilities of the Board:

- Audit and Risk Committee assists with financial reporting, maintaining an efficient system of
 internal control and promoting an ethical culture. Is also responsible for reviewing the risk profile of the
 business and oversight of risk management process, while ensuring appropriate procedures are in
 place to comply with legal obligations.
- **Environmental Social and Governance** assists the Board with oversight of Environmental, Social and Governance (ESG) and sustainability matters involving the United Energy group.
- **Remuneration Committee** reviews and makes recommendations on remuneration arrangements for our people.

United Energy is managed by an Executive Management Team (EMT), which is led by the Chief Executive Officer and consists of general managers and chief officers from each of our business units:

<u>Electricity Networks</u>: Our Electricity Networks business unit manages our network assets, including our control room. They also are accountable for planning and design of upgrades and augmentations to the electricity network.

<u>Service Delivery:</u> Service Delivery is responsible for project delivery and project management, management of UE's external field workforce, and delivery of the works program.

<u>Finance:</u> The Finance business unit is responsible for the financial management of United Energy covering financial control, regulatory reporting, strategic financial planning, treasury, and taxation. Finance also covers operational functions spanning revenue management, procurement, commercial property and facilities management, payroll, corporate risk and insurance.

<u>Corporate Services</u>: The Corporate Services business unit covers operational functions such as revenue management, procurement, commercial property and facilities management and payroll.

<u>People, Culture and Legal:</u> Our People, Culture and Legal business unit provides advice and services to support the achievement of our strategic objectives and living our values, including health, safety and environment; HR Operations and Recruitment; Legal; and Organisational Development.

<u>Corporate Affairs, Customer and Strategy:</u> Our Corporate Affairs, Customer and Strategy business unit is responsible for driving customer service improvement across the whole organisation and is the primary point of contact for our customers and electricity retailers. It is also responsible for delivering strategic initiatives, managing business improvements and process documentation, maintaining ISO certification, providing change management and internal audit services.

<u>Information Technology</u>: Our IT business unit is responsible for the strategy, planning and delivery of information technology.

<u>Regulation</u>: Our Regulation business unit has two areas of responsibility: Regulation (which includes the regulatory reset and compliance), and Regulatory Strategy and Pricing.

1.4 People

As of 31 December 2024, United Energy employed 308 people.

We also engage supplementary labour from contracted labour hire agencies on an asneeds basis.

Our people are located across three depots in Keysborough, Mornington and Glen Waverley and head office in Melbourne CBD.



1.5 Supply chains

We do not manufacture the products we use in our businesses. We buy them from suppliers, many of which purchase components from their own suppliers. We also buy services for the operation of our businesses.

With a total third-party expenditure of \$443.8 million for 2024, UE supply chains include the following:



Network Services \$245.2M

Vegetation Management P2P & Minor Civils Major Civils LSA & Resource Partners Traffic Management



Network Materials \$32M

Transformers Line Hardware AMI Meters Switchgear Cables Poles



Information Technology \$65.5M

IT Consultancy IT Services Hardware & Software Telecommunications



Fleet \$3.5M Fleet Services Vehicle - Heavy

Vehicle - Light



Property & Real Estate \$64.0M

Construction Amenities

Facilities Management Security



Corporate & Indirect \$33.6M

Recruitment & Consultancy Training Media & Marketing PPE Travel and Accommodation Legal Services

As of 31 December 2024, we have 386 active suppliers, with 96.11% (based on their direct engagement business locations) located in Australia. The small number based overseas are located in Canada, Hong Kong, United Kingdom, New Zealand, Europe, Asia (excluding China and Hong Kong) and the USA. Further detail is provided in Section 2 – Modern Slavery risk in our operations and supply chain.

The products we procure include energy infrastructure materials such as power cables, transformers, line hardware, poles, protective equipment and public lighting materials. We also source IT hardware, fleet resources and network-related consumables. Key services we engage in incorporate vegetation management, construction and maintenance, facilities management, traffic management, as well as IT and professional services.

To mitigate the risk of modern slavery within our supply chains, we have established rigorous measures. Our <u>Supplier Code of Conduct</u>, outlines the ethical expectations for all suppliers, emphasising a commitment to human rights and the prevention of exploitation. This code applies to all suppliers providing goods and service to UE.

Furthermore, our procurement processes reinforce these commitments. Every tender released to the market includes our stance on compliance with the Act and sets clear expectations for suppliers to align with these standards. Tenderers submitting offers must provide detailed information about their business practices and demonstrate how they adhere to our Supplier Code of Conduct, including modern slavery requirements.

Beyond compliance, we consider various non-price factors when selecting suppliers. These include safety performance, labour practices, alignment with our values, and contributions to the communities in which we operate.

1.6 Our progress since our last statement

This is our fifth modern slavery statement. We have continued to put a high focus on improving our understanding of modern slavery in our operations and supply chains and the associated risks.

In 2024, the Procurement Social & Governance team was established to strengthen ethical sourcing, sustainability, and governance practices within our procurement operations. This team plays a crucial role in ensuring compliance with human rights standards, including the Modern Slavery Act, environmental sustainability and corporate social responsibility across supply chains.

This year, we launched the **Social & Sustainable Procurement Framework**. The framework establishes principles and practices that promote social and sustainable procurement and purchasing activities for all goods, materials and services in line with the Procurement & Purchasing Policy. This includes labour and human rights expectations and minimum ethical, moral and corporate governance requirements of suppliers that we engage with. The framework has been established to guide Procurement and business stakeholders and will be further developed into 2025.

We conducted our Modern Slavery supplier self-assessments, to understand how our suppliers are addressing modern slavery obligations in their operations and supply chains and the challenges they currently face. An analysis of unexpected answers was completed with follow-up and clarification from all suppliers. Further information can be found in Section 3 - Our ongoing approach to assessing and addressing modern slavery.

In 2024, we focused on implementing a new 'source to contract' solution called Felix, which was designed to enhance supplier onboarding and compliance, streamline tendering processes and improve supplier performance management. By the end of the year, the system was successfully implemented across the UE business, meeting key milestones and aligning with our goals. Modern Slavery questions form part of the prequalification for prospective suppliers, identifying risks or gaps prior to tendering or engagement.

A critical part of our efforts in 2024 involved working with our Procurement Leaders to re-evaluate risk assessments across all supply categories to identify and mitigate potential modern slavery risks effectively. Additionally, for the first time, we conducted Supplier due diligence review with 6 of our strategic suppliers, representing approximately 10% of our strategic supplier base. This process included in-depth evaluations of their policies, practices, and supply chain management to identify vulnerabilities and ensure compliance with modern slavery legislation. The audits were conducted through detailed supplier questionnaires and documentation reviews, aiming to foster greater accountability regarding Modern Slavery risks with our key partners. Further details can be found in Section 3.2 – Supplier due diligence reviews.

All contracts continue to contain anti-slavery and human trafficking requirements. Under these contracts, suppliers must include in its contracts with direct subcontractors and suppliers, anti-slavery and human trafficking provisions that are at least equivalent to the head contract.

2 Modern slavery risks in our operations and supply chain

The risk of modern slavery within our operations is minimal. Our team members are directly employed under contracts or agreements that adhere to Australian employment laws and relevant industrial instruments. We actively monitor and address human rights concerns through various policies and procedures, including our Code of Conduct and Diversity, Equity and Inclusion Policy.

UE acknowledges that the most significant modern slavery risk lies within our external supply chains. In 2024, we once again conducted a modern slavery risk-mapping assessment, analysing our procurement activities across operations and supply chains. This assessment focused on supplier expenditure by industry and geographic location.

2.1 Industry Risk

Based on supplier industry and expenditure, our top key risk sectors continue to be classified as:

Cleaning Services



The cleaning industry is considered high-risk due to its reliance on low-skilled labour, which can make workers vulnerable to exploitation, including underpayment, excessive working hours, and poor working conditions. This sector often employs migrant workers and subcontractors, increasing the risk of hidden labour exploitation and modern slavery, particularly when companies use multi-tiered labour-hire arrangements.

Safety Equipment & workwear



This category includes the procurement of personal protective equipment (PPE), uniforms, high-visibility clothing, gloves, and other safety gear. Many of these products are sourced from countries with weaker labour laws, where workers in textile and garment manufacturing industries may face unsafe working conditions, low wages, and forced labour. The global supply chains for raw materials like cotton and synthetic fabrics may also involve exploitative labour practices.

Electrical Components and Equipment



This industry includes companies that supply electric cables and wires, electrical components, or equipment not classified in the Heavy Electrical Equipment sub-industry. The electronics industry typically has long international supply chains for its raw materials manufacture and product assembly.

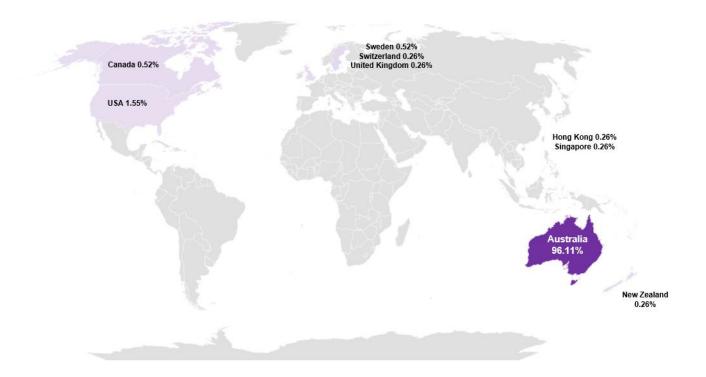
Human Resource and Employment Services



UE typically sources these services from Australian companies with local labour contracts. While these services are typically lower risk in Australia, the direct impact on people means this sector carries an inherent modern slavery risk. Suppliers in this industry provide business support services relating to human capital management, including employment agencies, training, payroll and benefit support services, retirement support services and temporary labour hire agencies.

2.2 Geographic risk

Some countries have higher risks of modern slavery than others. As over 96% of UE's suppliers are based in Australia (based on their direct engagement business locations), a nation with democratic governance, strong rule of law, minimal internal conflict and healthy economic development, the geographic modern slavery risks are reduced.



Region	% of Spend
Australia	96.11%
USA	1.55%
Europe	1.04%
Canada	0.52%
Hong Kong	0.26%
New Zealand	0.26%
Singapore	0.26%

3 Our ongoing approach to assessing and addressing modern slavery

3.1 Overview

UE has taken significant steps to understand and mitigate the risk of modern slavery within our supply chain. In 2024, we continued to build on our existing initiatives, reinforcing our commitment to ethical sourcing and supplier accountability. Below is a summary of our key actions:

- Policy Enhancements We conducted ongoing reviews of our policies and procedures, including our Procurement and Purchasing Policy, to ensure alignment with the latest modern slavery laws. This includes incorporating modern slavery risk considerations into supplier selection and tendering processes. In 2024, we launched the Social & Sustainable Procurement Framework, which was developed in conjunction with our existing policies and integrates principles of ethical and sustainable sourcing.
- **Supplier Risk Assessment** Throughout 2024, we performed in-depth risk assessments, focusing on geographic locations, industry sectors, and the nature of products and services sourced. These assessments, outlined in Section 2, help us identify and address potential risks within our supply chain.
- Supplier Modern Slavery Self-Assessment Following our third modern slavery supplier survey in 2023, we conducted our fourth supplier self-assessment in 2024. This initiative helps monitor suppliers' understanding and compliance with modern slavery requirements. The results showed strong adherence to legislation and an improved awareness of our expectations. Suppliers demonstrated increased visibility into their supply chains, strengthened policy and process documentation, and incorporated modern slavery measures into broader Environmental, Social & Governance (ESG) initiatives. This year, we expanded our assessment to include high- and medium-risk suppliers, covering over 85% of our procurement spend. Through this process, zero instances of modern slavery were reported or identified.
- **Training & Awareness** We delivered modern slavery training to our procurement team and other relevant employees, increasing awareness of modern slavery risks, our mitigation responsibilities, and reporting mechanisms. More than 70 employees successfully completed this training.
- Contract Terms & Compliance Since 2021, all procurement contracts and standard purchase
 orders have included anti-slavery and human trafficking clauses. These clauses require suppliers to
 notify us of any suspected or actual instances of modern slavery within their supply chains and extend
 the same obligations to their own suppliers. Contracts established before 2021 are reviewed during
 renewals or variations to ensure compliance. This process has remained a priority in 2024.
- **Encouraging Reporting & Transparency** We are committed to fostering an open and ethical working environment where employees, suppliers, and their families feel safe reporting concerns, including those related to modern slavery. We provide a secure, independent reporting mechanism that protects whistleblowers and ensures that any issues raised are addressed appropriately.

Through these initiatives, we continue to strengthen our approach to mitigating modern slavery risks, ensuring accountability and promoting ethical practices across our supply chain.

In addition to the above, the below initiatives were incorporated into our processes to assess and address modern slavery in our supply chains.

- Supplier Prequalification and Onboarding in 2024, UE's 'Source to Contract' solution was further
 established into procurement practice, including supplier pre-qualification and onboarding. Through
 the prequalification questionnaire, an initial check of modern slavery risk assessment and
 understanding is established, prior to engagement with the supplier. This allows our Procurement team
 to identify any gaps or issues from the onset.
- Due Diligence Reviews with Strategic Suppliers for the first time in 2024, UE conducted Modern Slavery due diligence reviews of selected strategic suppliers, identified in our high-risk industries or locations. The development of this program with our key partners ensures accountability and understanding of our secondary supply chains. The findings of these reviews are presented in the following section 3.2 - Supplier due diligence reviews.

3.2 Supplier Due diligence reviews

2024 marked the foundation year of our Supplier Due Diligence Reviews on Modern Slavery. This initiative was introduced to establish a structured approach to assessing modern slavery risks within our supply chain and to strengthen our commitment to ethical sourcing. The reviews were conducted with six strategic suppliers, representing 10% of our strategic supplier base, and served as a baseline for future assessments and continuous improvement.

Key Findings

The reviews focused on six key areas, providing valuable insights into suppliers' modern slavery risk management practices:

- Company Information & Supply Chain Structure: Suppliers operate across various countries, with differing levels of supply chain visibility. While some suppliers demonstrated robust oversight, others identified challenges in tracing their full supply chain.
- Policies & Procedures: Most suppliers had modern slavery policies in place and assigned responsibility to dedicated personnel. However, variations existed in how these policies were communicated and enforced across their supply chains. As expected, larger corporations have more mature process and policies.
- **Risk Assessments:** While several suppliers had conducted risk assessments, not all had formalised processes for regular updates, indicating an opportunity for improvement in ongoing risk monitoring.
- Training & Capacity Building: Modern slavery training was available for internal employees in most
 cases, but fewer suppliers extended training to their suppliers, highlighting a key area for further
 development.
- Reporting & Remediation: All suppliers had established internal reporting mechanisms for modern slavery concerns. Differences existed in the extent of monitoring and enforcement mechanisms applied to their own supply chains.
- **Public Reporting:** Suppliers subject to the Australian Modern Slavery Act 2018 were compliant with reporting requirements, with all having publicly available Modern Slavery Statements.

Next Steps & 2025 Rollout

As this was our foundation year, the findings from this initial review will be used to shape our future approach. Key next steps include:

Expanding Supplier Participation: In 2025, we will expand the due diligence reviews to cover a
larger proportion of our strategic and high-risk suppliers, improving visibility and accountability across
the supply chain.

• **Supplier Relationship Management (SRM):** Supplier responses will be continually reviewed through our SRM framework, ensuring compliance and driving improvements.

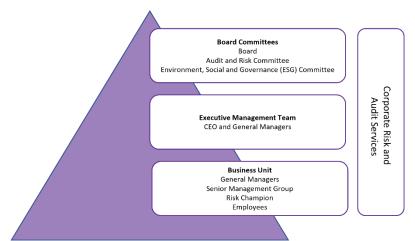
The 2024 review has laid the groundwork for a structured and proactive approach to modern slavery risk management. By building on this foundation in 2025, we will continue to strengthen our supply chain oversight and reinforce our commitment to ethical and responsible procurement practices.

3.3 Corporate Governance

United Energy's Board is responsible for the corporate governance and strategic direction of the United Energy group. Its responsibilities specific to the management of modern slavery include:

- Compliance with the Code of Conduct
- Ensuring that significant risks facing the Group have been identified and that appropriate and adequate control, monitoring, accountability and reporting mechanisms are in place.

UE has established Committees to assist the Board in the execution of its duties. The Risk Management and Compliance Committee oversees and makes recommendations to the Board on UE's risk profile and ensures appropriate policies and procedures are adopted.



The Committee also assists the Board with its responsibilities to oversee compliance statute and regulations.

3.4 Risk management

Risk management is embedded in our business operations, influencing our policies, systems, and processes, including strategic planning, performance management and corporate governance.

We adopt an Enterprise Risk Management approach, ensuring a structured and consistent process for identifying, assessing, and managing strategic, operational, and emerging risks. This approach includes assigning accountability, evaluating controls and the broader control environment and allocating appropriate resources to mitigate risks effectively.

Our formal Enterprise Risk Management Framework, aligned with the International Standard for Risk Management (AS/NZS ISO 31000:2018), undergoes six-monthly reviews to assess business risk exposures. The framework establishes clear structures for risk identification, analysis, monitoring, and reporting, with regular updates provided to the Board via the Risk Management and Compliance Committee.

The Executive Management Team (EMT) holds executive oversight of risk management across the business, with the Corporate Risk Team regularly presenting risk profiling insights to EMT members.

Recognising the importance of ethical and responsible business practices, we formally integrated the risk of modern slavery into our Enterprise Risk Framework in 2021, reinforcing our commitment to proactive risk management and compliance.

3.5 Operational due diligence

We continue to take a proactive approach to modern slavery due diligence internally by creating a positive culture where our people are comfortable speaking up and are aware of their rights. Our policies and procedures (listed below in Section 3.6 – Policies and procedures) provide guidance and clear information to our employees about their rights and responsibilities.

Leaders across our business are encouraged to be aware of and be vigilant around instances of modern slavery within our workforce. This includes both employees and contractors. We support and comply with Australia's strong workers' health and safety legislation which acts as a mitigating factor to modern slavery risks within our workforce.

3.6 Policies and procedures

In addition to our governance structure set out above, we maintain and implement a range of policies and procedures to mitigate modern slavery risks in our operations and supply chains. These include:

Document	Description
Health and Safety Policy	The health and safety of our employees, contractors, customers and the community is our highest priority. Supporting and complying with Australia's strong workers' health and safety legislation also acts as a mitigating factor to modern slavery risks within our workforce and supply chain.
Procurement and Purchasing Policy	provides direction on ensuring the procuring and purchasing of goods and services meet regulatory, business and governance requirements.
Supplier Code of Conduct	outlines ethical standards in behaviours that suppliers, as partners, will aim to meet when conducting business with United Energy.
Whistleblower Policy	aims to encourage reporting of wrongdoing that is of a legitimate concern by providing a convenient and safe reporting mechanism and protection for people who make a disclosure. This policy is for use by our employees or contractors and their families, our suppliers and their families.
Employee Handbook Code of Conduct	provides guidance to our employees on our company values, code of conduct, relationships with suppliers and reporting a concern.
Enterprise Risk Management Policy and framework	enables key stakeholders to understand and respond to the risks that may affect business objectives, effectiveness and efficiency.

3.7 Training

The Procurement Team, along with other key teams across the business, has participated in Modern Slavery Act training as part of our ongoing efforts to reinforce the risk of modern slavery in our operations and supply chains. The training, conducted in November & December 2024, provided employees with essential knowledge on the broader human rights agenda, focusing on the key human rights challenges within the energy services sector. It also included a detailed overview of UE's internal processes and relevant documents related to modern slavery, ensuring all participants understand the scope and responsibility in identifying and addressing risks within the supply chain.

More than 70 employees successfully completed this training, making it a significant part of our ongoing education and awareness initiatives. This training is not a one-time event—it will be regularly updated to align with any amendments or updates to the Modern Slavery Act, ensuring that the information provided remains current and relevant.

Additionally, the training will be made available annually to new starters within the Procurement Team and other departments involved in the supply chain and risk management. This ensures that new employees are equipped with the necessary knowledge and tools from the outset. Furthermore, it will also be available as refresher training for any employees wishing to revisit or update their understanding of modern slavery risks, our responsibilities, and the key processes involved in mitigating these risks. This ongoing, accessible training program ensures that all relevant team members remain well-informed and prepared to act against modern slavery in our supply chain.

4 Measuring our effectiveness

We remain deeply committed to measuring and improving the effectiveness of our modern slavery risk management efforts. Throughout 2024, we continued to prioritise risk identification and management processes, focusing on enhancing employee awareness and knowledge through ongoing training. Additionally, we conducted continuous reviews and updates of our policies and procedures to ensure they effectively support the management of modern slavery risks and remain compliant with the Modern Slavery Act.

Notably, in 2024, we had **no confirmed instances of modern slavery** raised for remediation within our supply chain. If an instance of modern slavery is identified within a specific supplier's operations or supply chain, we are committed to working closely with the supplier to address and remediate the issues. However, if we are unable to reach a satisfactory resolution, we will consider implementing alternative measures, including the potential termination of our relationship with the supplier.

Our Whistleblower Program provides a crucial and effective mechanism for reporting and escalating concerns related to modern slavery, whether from employees, suppliers, or their families. We are dedicated to fostering a safe and open environment where concerns can be reported without fear of retaliation or retribution. The program also allows for anonymous reporting to ensure that individuals can raise issues without any risk of harm.

5 Stakeholder engagement and consultation

The content of this statement applies to all entities owned and controlled by United Energy. As the directors of United Energy are also directors of each other reporting entity in the group, and the group is managed by a single executive management team, uses the same policies and processes, and shares many of the same suppliers, we have provided a single consolidated description of our actions to address modern slavery risks and this statement has been prepared on a 'whole of group' basis.

The working group that co-ordinated preparation of this statement included representatives from our procurement, sustainability, corporate affairs and legal teams and received input from each of our operating businesses, our risk team and our executive management team.

Consultation was undertaken at Board level through presentations to and feedback from the Environmental, Social and Governance (ESG) Committee and consideration and approval of this statement by the UE Board.

This statement was approved by the Board of each reporting entity on 28 May 2025.

6 Our plans for 2025 and beyond

The management of modern slavery risk in our supply chains in an ongoing program, and we endeavour to improve our understanding and visibility of this risk in all areas of our operation.

In 2025, we have plans to:

- **1.** Continue to develop the supplier due diligence reviews with our strategic suppliers in high- and medium- risk categories;
- 2. Continuous evaluation of our risk assessment for all categories of supply;
- **3.** Continue to grow the depth of our Self-Assessment questionnaire to understand what our suppliers are doing to reduce the risks of modern slavery in their business and supply chain;
- **4.** Partner with industry peers through Energy Procurement Supply Associated (EPSA) Modern Slavery Working Group and Clean Energy Council Risk of Modern Slavery Working Group;
- 5. Continue relevant team engagement and upskilling about modern slavery in our supply chain; and
- **6.** Provide Modern Slavery training for all new team members who join the procurement team as well as ensuring refresher training is available for the existing team.

