



**Modern
Slavery
Statement
2022**

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This Statement is a joint Modern Slavery Statement for AGIG for the reporting period 1 January 2022 - 31 December 2022.

Acknowledgement of Country

AGIG acknowledges the Traditional Custodians of the lands upon which we live and operate, and we pay our respects to Elders past, present and emerging. We recognise Aboriginal and Torres Strait Islander people's historical and ongoing connection to land and waters, and we embrace the spirit of reconciliation.



A MESSAGE

FROM THE CEO

Welcome to our Modern Slavery Statement for 2022.

At AGIG, our Vision and Values guide everything we do as a business, with safety of people a key priority. This extends to our role in ensuring that human rights are respected within our business operations and supply chains. This Modern Slavery Statement provides an overview of how we address modern slavery risk in our business, operations, workforce and supply chains.

Over the past year, our approach to addressing modern slavery has focused on embedding modern slavery checks into existing procurement practices, upskilling and enhancing our internal due diligence capabilities to reduce reliance on external service providers and including modern slavery reporting into our Environmental, Social and Governance (ESG) framework. We have also continued our efforts to raise employee and contractor awareness and provide training, and we have deepened our in-house knowledge and skills.

As always, we endeavour to implement sustainable procurement practices and we remain committed to continuous improvement in this area, in alignment with our ESG goals. We consider that addressing modern slavery risk is essential for us to achieve our vision of being Australia's leading gas infrastructure business.



Craig de Laine
Chief Executive Officer



OUR VISION

Our vision is to be the leading gas infrastructure business in Australia...



...aiming for top quality performance on our targets

OUR VALUES

They drive our culture:
how we behave and
how we make decisions





Introduction

This modern slavery statement (Statement) is prepared and submitted in compliance with the Modern Slavery Act 2018 (Cth) (the Act). In accordance with section 14 of the Act, this Statement is a joint statement covering the reporting period 1 January 2022 to 31 December 2022, submitted by Australian Gas Infrastructure Holdings Pty Ltd (AGIH) for the following reporting entities (as that term is defined in the Act) within the AGIG group of companies (AGIG):

- Australian Gas Infrastructure Holdings Pty Ltd ABN 22 120 456 573
- Australian Gas Networks Holdings Pty Limited ABN 24 169 818 026
- Australian Gas Networks Limited ABN 19 078 551 685
- Australian Gas Networks (VIC) Pty Ltd ABN 73 085 899 001
- Multinet Gas Distribution Partnership ABN 53 634 214 009
- DBNGP (WA) Transmission Pty Limited ABN 69 081 609 190

In this statement, unless expressly mentioned otherwise, references to AGIG, the Company, we, us and our, refer to the reporting entities collectively, their subsidiaries and controlled entities. This statement does not cover our non-controlled nor non-operated joint venture operations.

AGIG is opposed to modern slavery and will not knowingly conduct business with parties that engage in modern slavery or other unethical business practices. We apply the Act's definition of "modern slavery" in our internal policies, practices and resources and our external Sustainable Procurement Standard, to communicate to all stakeholders our expectations regarding modern slavery risks.

This Statement is our third Modern Slavery Statement. Our historical statements are available [on our website](#).

QUICK GUIDE

TO OUR STATEMENT

Requirement of the Act	Our Statement
Identify the reporting entity, section 16(1)(a)	Introduction page 5
Describe the reporting entity's structure, operations and supply chains, section 16(1)(b)	Our Vision and Values page 4 About AGIG page 8 Our corporate structure, Our workforce, Our supply chains, Our operations and Our role in the gas industry pages 9-12
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity that it owns or controls, section 16(1)(c)	The risks of modern slavery in our operations and supply chain pages 13 - 16
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes, section 16(1)(d)	The actions we have taken to assess and address the risks pages 17 - 20 Our approach to response and remediation page 18
Describe how the reporting entity assesses the effectiveness of these actions, section 16(1)(e)	How we measure the effectiveness of actions taken page 20
Describe the process of consultation with any entities the reporting entity owns or controls and the entity giving the statement, section 16(1)(f)	Collaboration page 21
Other relevant information (including COVID-19), section 16(1)(g)	Impact of COVID-19 pandemic page 21
Details of approval by the relevant principal governing bodies, section 16(2)(b)	Sign-off page 22

HIGHLIGHTS

FROM 2022

- We did not receive any complaints or reports to our independent reporting hotline of modern slavery occurrences within our business or supply chains
- We met the objectives referred to in our 2021 Modern Slavery Statement (“Future actions we intend to take”), including:
 - Embedding our modern slavery due diligence within our ESG practices and integrating modern slavery reporting with ESG reporting;
 - Empowering our ESG Committee with responsibility for oversight of modern slavery risks;
 - Enhancing our procurement practices to prioritise modern slavery risk assessment and ensuring modern slavery due diligence is undertaken prior to contract award, where appropriate;
 - Continuing to deliver modern slavery training to employees and providing ad hoc modern slavery risk awareness content;
 - Continuing to encourage awareness and reporting of any instances where employees become aware of the possibility of modern slavery occurring;
 - Directly engaging with new suppliers in the tendering phase through self-assessment questionnaires; and
 - Facilitating modern slavery awareness activities with staff and participating in industry working groups.



We are Australian Gas Infrastructure Group

One of Australia's largest gas infrastructure businesses

Our vision is to be the leading gas infrastructure business in Australia. We will achieve this by delivering for our customers, being a good employer and being sustainably cost efficient.

We own and operate infrastructure that delivers gas to Australian homes, businesses and communities. We also deliver and store gas that supports the Australian economy - for power generators, mines and manufacturers. We have commissioned an Australian-first project in renewable hydrogen production in South Australia and are working towards delivering other renewable hydrogen projects across Australia.



Dampier Bunbury Pipeline

Operates gas infrastructure (transmission pipelines and storage) in Western Australia and the Northern Territory.



Multinet Gas Networks

Operates gas distribution in Victoria.



Australian Gas Networks

Operates gas infrastructure (distribution and transmission pipelines) in Victoria, South Australia, Queensland, New South Wales and the Northern Territory.

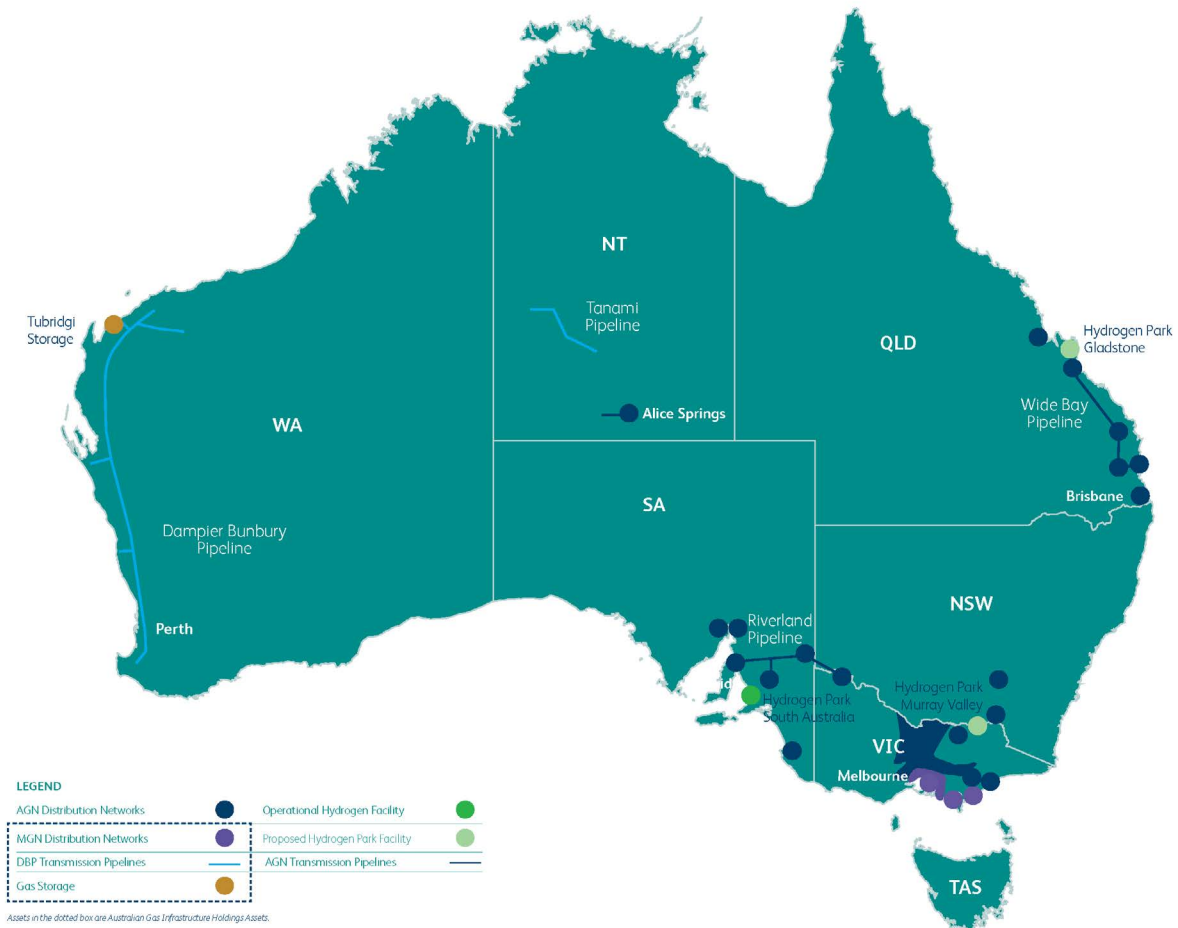
AGIG builds and operates infrastructure across the country.



OPERATIONS

ACROSS AUSTRALIA

Our Business



Northern Territory

- 1,166 customers
- 806TJ delivered in 2022
- Distribution 36km
- Transmission 601km

New South Wales

- 62,991 customers
- 5,634TJ delivered in 2022
- 90%+ penetration
- Distribution 2,119km
- Transmission 84km

Victoria

- 1,456,139 customers
- 110,199TJ delivered in 2022
- 90%+ penetration
- Distribution 22,110km
- Transmission 501km

Queensland

- 110,128 customers
- 6,011TJ delivered in 2022
- 30%+ penetration
- Distribution 3,234km
- Transmission 324km

South Australia

- 474,627 customers
- 30,195TJ delivered in 2022
- 90%+ penetration
- Distribution 8,348km
- Transmission 480km

Western Australia

- 455 shippers
- Transmission 2,337km
- 60PJ storage

Our Role

AGIG's Services

Our **transmission pipelines** deliver gas from processing facilities across Australia to the end users where it is used for power generation, mineral processing, manufacturing and distribution networks.

Our mid-stream Tubridgi **gas storage** facility provides gas producers and gas users with the ability to insure against outages and boost energy security.

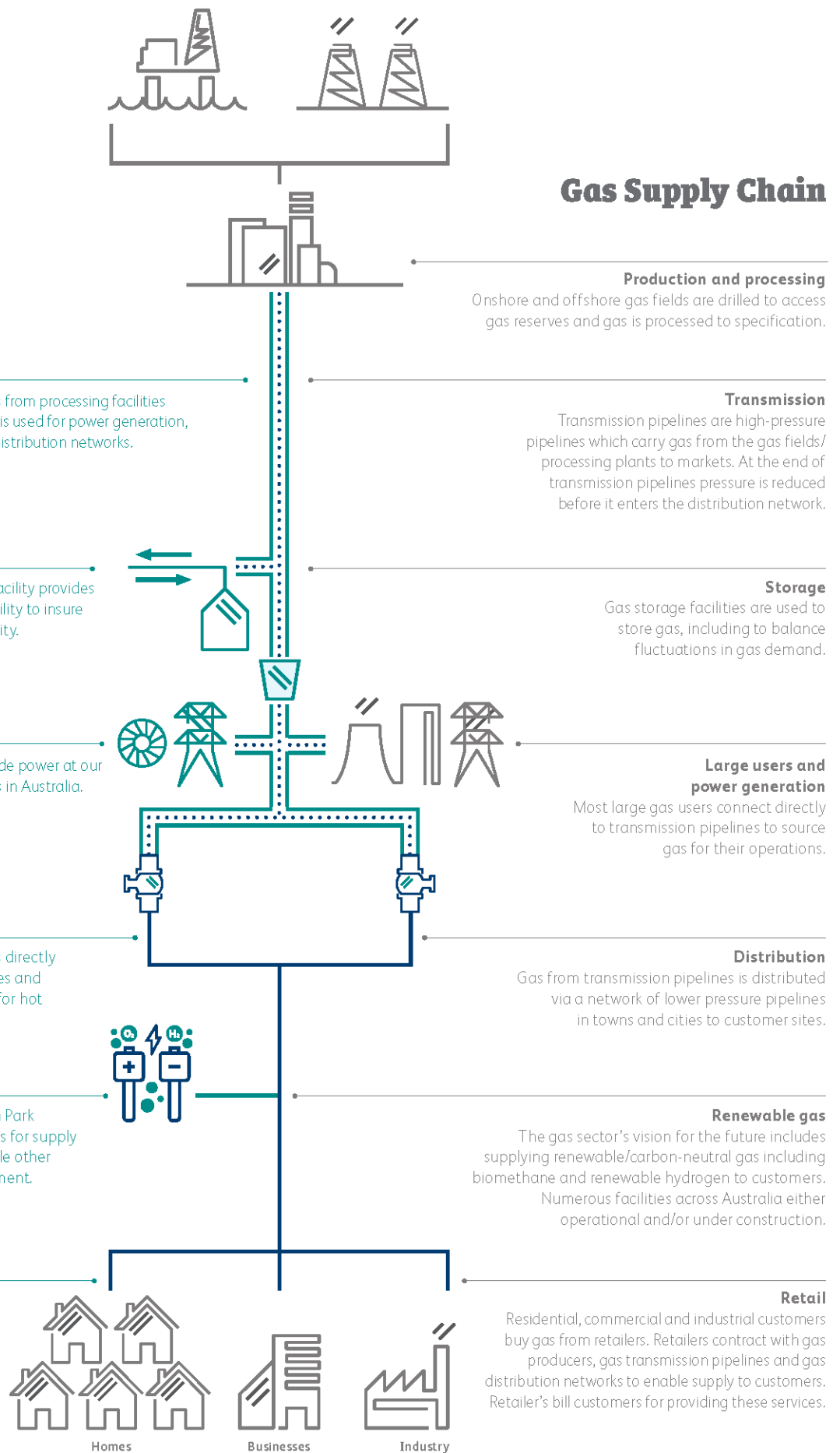
Our **power generation facilities** provide power at our sites in some of the most remote regions in Australia.

Our **distribution networks** deliver gas directly to customers through underground pipes and gas meters, providing essential energy for hot water, heating and cooking.

Our **renewable gas facility** Hydrogen Park South Australia produces renewable gas for supply to over 700 customers. We have multiple other Hydrogen Park projects under development.

We maintain and read over **2 million gas meters** in homes and businesses across Australia.

Gas Supply Chain



Production and processing

Onshore and offshore gas fields are drilled to access gas reserves and gas is processed to specification.

Transmission

Transmission pipelines are high-pressure pipelines which carry gas from the gas fields/processing plants to markets. At the end of transmission pipelines pressure is reduced before it enters the distribution network.

Storage

Gas storage facilities are used to store gas, including to balance fluctuations in gas demand.

Large users and power generation

Most large gas users connect directly to transmission pipelines to source gas for their operations.

Distribution

Gas from transmission pipelines is distributed via a network of lower pressure pipelines in towns and cities to customer sites.

Renewable gas

The gas sector's vision for the future includes supplying renewable/carbon-neutral gas including biomethane and renewable hydrogen to customers. Numerous facilities across Australia either operational and/or under construction.

Retail

Residential, commercial and industrial customers buy gas from retailers. Retailers contract with gas producers, gas transmission pipelines and gas distribution networks to enable supply to customers. Retailer's bill customers for providing these services.

Homes

Businesses

Industry

● AGIG Services

● Non-AGIG Services



Our Corporate Structure

The reporting entities are managed by a single executive management team, supervised by separate Boards of Directors.

AGIH and its subsidiaries are Australian incorporated private companies with registered offices in Perth and Adelaide. AGIH is ultimately owned by a consortium made up of CK Infrastructure Holdings Limited, CK Asset Holdings Limited and Power Asset Holdings Limited.

AGNH and its subsidiaries are Australian incorporated private companies with registered offices in Adelaide (with the exception of one non-operational subsidiary that is incorporated overseas). AGNH is ultimately owned by CK Infrastructure Holdings Limited, CK Hutchinson Holdings Limited and Power Asset Holdings Limited.

For further information on our executive management team, corporate structure or ownership, please see our website: <https://www.agig.com.au/>

CK Infrastructure Holdings Limited, CK Asset Holdings Limited and Power Asset Holdings Limited are offshore foreign entities that do not need to report under the Act. However, CK Infrastructure Holdings Limited submits a modern slavery and human trafficking statement under the UK Modern Slavery Act 2015. CK Infrastructure Holdings Limited also publishes a Modern Slavery and Human Trafficking Statement and a Sustainability Policy.

To review these policies please see:

[modern slavery and human trafficking statement.pdf](#)

https://www.cki.com.hk/english/sustainability/sustainability_policy/index.htm

WORKFORCE

OUR PEOPLE

We employ approximately 415 employees across Australia (on full time and part-time bases). The average age of AGIG employees is 46.5 years and 29% of our employees are female. We do not employ any staff under the legal age for work in Australia. We also have more than 1,600 contractors working for our business.

SUPPLY CHAINS

Due to the nature of our operations and business, our supply chains are diverse, international and multi-tiered. Procurement is undertaken in collaboration with subject matter experts in the procurement, finance, technical and asset management teams, working with legal advisors and contract owners as required.

On an annual basis, we contract directly with over a thousand suppliers. All of our suppliers are required to comply with our Sustainable Procurement Statement, [available here](#).

We endeavour to contract with Australian based suppliers where possible and we typically contract on AGIG standard contract terms. All of our standard procurement contracts contain contractual clauses that require our suppliers to ensure that modern slavery does not occur in their business, operations or supply chains.

Our purchase order terms and conditions are [available here](#).





The risks of modern slavery in our operations and supply chain

To understand the risk of modern slavery arising in our operations and supply chains we adopt a four step process:

1. We use a risk based framework to tender and procure goods and services, with varying steps taken to understand, assess and address modern slavery risks. This framework is illustrated in the image below.
2. This framework has been developed using publicly available guidance on performing due diligence as a sustainably cost efficient way of understanding the risks of modern slavery in our operations and supply chains.
3. We undertake year to year comparative analysis. In previous reporting periods we have relied on external consultants to undertake extensive due diligence for us on our top 500 suppliers using advanced supply chain mapping tools. Comparative analysis of annual spend data (a list of our top 500 suppliers by value) shows that our annual procurement spend is relatively consistent and stable. This analysis shows that the suppliers, industries and regions of manufacture that make up our supply chain are similar year to year.

Accordingly, our existing supply chain mapping remains relevant and helpful for us to understand the risks of modern slavery in our operations and supply chains.

4. We utilize external consultants on an ad hoc, as required basis. Over the course of 2022 we have engaged external consultants on an ad hoc basis to help us understand the risks of modern slavery posed by specific tenders. We have used consultants with expertise and access to global databases covering both modern slavery and global sanctions. This has been immensely useful for our procurement team and executive management team in guiding decision making. Whilst no reports of actual modern slavery have been identified, the understanding of risks associated with particular products and regions has greatly increased.

1. Resources used include:

<https://www.walkfree.org/projects/business-and-investor-toolkit/>

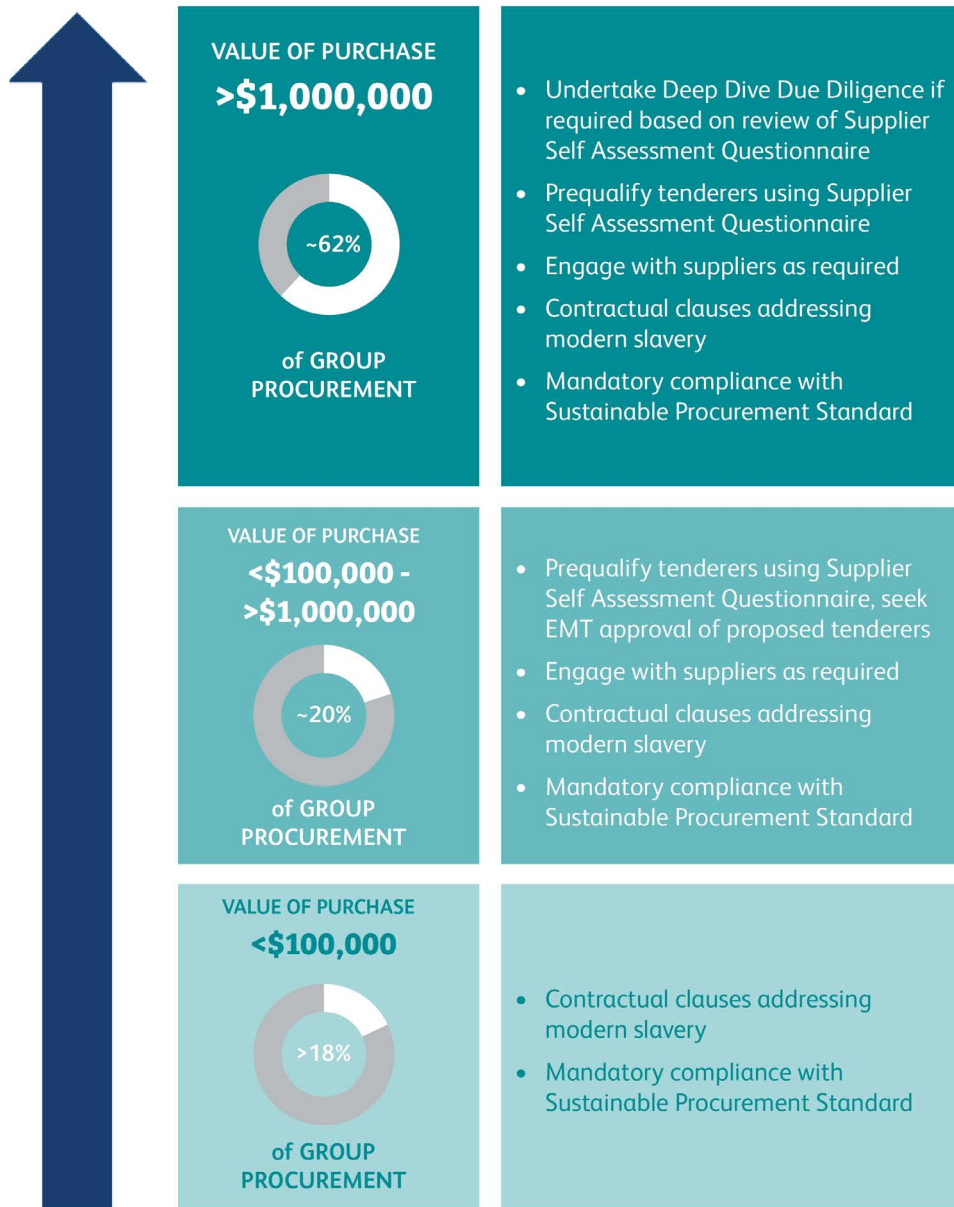
<https://www.responsiblesourcingtool.org/explorisk>

<https://www.transparency.org/en/cpi#>

<https://knowthechain.org/>

Our risk based approach to modern slavery

Modern Slavery Risk Management



IN SUMMARY

Applying these four steps, we have identified the following risks of modern slavery practices in our operations and supply chains:

- At operational sites, owned and operated by AGIG, we have not identified any actual incidences of forced labour or servitude within the workforce comprised of our direct employees. Our governance framework, including the AGIG Equal Employment Opportunity Policy and Zero Harm Principles, Fraud and Corruption Prevention and Whistleblowing Policy, as well as our compliance with requirements of Australian law (particularly with regard to workplace health and safety and employment), minimise the risk of forced labour or servitude occurring. We have a strong culture of reporting workplace health and safety incidences. To date, no reports of incidences of modern slavery occurring on an AGIG operational site have been received.
- Our due diligence found that there is a risk of modern slavery occurring indirectly in our supply chains. This arises from the breadth and depth of our supply chains that extend internationally, across a number of industries with multiple tiers.
- The regions and industries in our supply chain with the highest risk of modern slavery remain the same as reported in our last modern slavery statement. The highest risk regions include Australia (as this is where the largest proportion of our spend occurs), China, Indonesia and India. The highest risk industries include: Non-building construction and civil works; Other services (software, IT, catering, cleaning, security, clothing supply and office stationery); Wholesale trade; and metal products.
- We predominantly source goods and services, where possible, from Australia. However, it is often in the second or third tier of supply chains that the modern slavery risk is higher, as the raw materials or inputs used to produce goods that we procure, or to deliver services that we procure, are sourced from higher risk regions and generated in higher risk industries (for example, manufacturing in regions identified as higher risk).
- This year we have paid particular attention to relationships that our suppliers have with supplier partners, and their subcontractors, to ensure we are taking a broad approach to our modern slavery due diligence. We are aware of reports of Uyghur forced labour in China, pairing programs and districts associated with such programs and we consider the risks of such practices in the relationship partners or subcontractors of our suppliers prior to selection of supplier.
- Note that none of the information contained in this Statement or obtained through due diligence confirms the existence, or non- existence, of any actual incidence of modern slavery.

RISK FACTORS

In undertaking our assessment, we considered the following factors known to exacerbate modern slavery risk:

- Issues associated with region such as lack of regulation or enforcement agencies, poor track record on corruption and human rights, prevalence of criminal organisations, weak labour regulations and law.
- Issues associated with industry such as vulnerable workforces (low skilled, temporary jobs, poverty, migrants), long and complex supply chains, labour intensive industry.
- Issues associated with the supplier such as prevalence of labour issues or controversies (eg delayed payments, failure to meet labour regulations, discrimination of employees) and use of state sanctioned forced labour, high use of third party recruitment agencies.
- Issues associated with procurement practices such as cost cutting, tight deadlines, demand for cheaper goods and services.
- The ongoing international concern in relation to products that may be linked to Uyghur forced labour within the autonomous Xinjiang region.





The actions we have taken to assess and address the risks

During this reporting period, the actions we have taken to assess and address the risks include:

- We focused our attention on educating staff, raising awareness, amending procurement practices and engaging with our executive management team on modern slavery risks.
- We enhanced our internal framework for assessing and addressing modern slavery risk, to ensure we undertake due diligence in a sustainably cost efficient way.
- We continued to provide our bespoke training pack, specific to our business, to all legal, corporate services, procurement and commercial teams.
- We worked with external consultants FairSupply to perform extensive analysis on various suppliers throughout the year, to ensure that we were able to make sufficiently informed procurement decisions.
- We maintained the AGIG reporting hotline, which is a grievance mechanism for employees, contractors and suppliers to confidentially raise concerns about unethical conduct such as modern slavery. We encourage reporting to support a culture of honest and ethical behaviour, corporate compliance and good corporate governance. During the reporting period, zero reports of modern slavery concerns were reported to the grievance hotline.



Our approach to response and remediation

AGIG is developing its processes to respond and remediate modern slavery in its operations and supply chains based on the [“Modern Slavery Response and Remedy Framework”](#) prepared by Walk Free and Human Rights Resources and Energy Collaborative and the [“Effective Modern Slavery Grievance Mechanisms”](#) publication for business by Global Compact Network Australia.

If an instance of modern slavery is identified, AGIG’s approach will depend on the severity of the harm (or potential harm), and how AGIG is involved (i.e., whether AGIG has caused, contributed to or is directly linked to the harm, within the meaning of the UN Guiding Principles on Business and Human Rights). AGIG’s response and remediation approach is context specific and an appropriate response will be assessed on a case by case basis, depending on the relevant facts. AGIG considers that preventing harm to victims is of utmost importance and in responding to modern slavery, AGIG will endeavour to take actions that make good and prevent harm.

The range of actions that may be taken in the event an instance of modern slavery is identified could include: working with suppliers to improve practices and protect workers, developing corrective action plans, engaging with other relevant stakeholders (including local authorities if required) and in extreme cases where AGIG considers there is no appropriate alternative and workers will not be disadvantaged, may include terminating relationships.

FUTURE ACTIONS

WE INTEND TO TAKE

The future actions we intend to take include:

- Utilising an independent, external data base to conduct extensive supplier due diligence on a range of business ethics issues, including but not limited to modern slavery;
- Streamlining our procurement practices and processes to ensure consistency and best practice;
- Educating and empowering our internal procurement team to perform deeper risk assessments and engage with suppliers where modern slavery concerns arise;
- Increasing our awareness and efforts with staff to engage staff in meaningful discussion of modern slavery risks in areas outside of the workplace;
- Continuing to engage with suppliers through self-assessment questionnaires;
- Increasing our collaboration with sister companies and industry working groups; and
- Continuing to deliver and refresh modern slavery training.





How we measure the effectiveness of actions taken to assess and address the modern slavery risks

At AGIG, we established an ESG (environmental, social, governance) Committee in 2022. Modern slavery issues are overseen by the ESG Committee. For further information on our approach to ESG please view [our report](#).

In our previous modern slavery statements we reported on certain key metrics in order to measure the effectiveness of our actions and assess and address modern slavery risks. We set out in the table below the results for these metrics for 2022.

Based on the results reported below, we consider that our actions taken to assess and address modern slavery risks have been effective; however, as always, there is room for improvement. We remain committed to improvement in this evolving area and will continue to report on these metrics in future modern slavery statements.

Reportable Metric	Result
The number of modern slavery grievances reported to our reporting hotline	0
The number of employees that completed modern slavery training in 2022	67
The number of instances where contracts have been terminated due to modern slavery concerns	0

COLLABORATION

This Statement was prepared jointly by the reporting entities. The ESG Committee of the reporting entities has recommended the Statement and each of the relevant Boards has approved and provided sign-off (see page 23 of this Statement).

We also prioritise collaboration with our related entities and sister companies, in Australia and abroad, to share learnings and enhance collective effectiveness and impact.

We participated in an industry focus group on modern slavery remediation, contributing to research for projects led by the Australian

Human Rights Institute in collaboration with a consortium of academics and non-government organisations examining the effectiveness of the Act.

We facilitated and encouraged discussion of modern slavery affecting the tea industry, as an example of real life modern slavery issues. A presentation was provided to interested employees, assisting them to understand how their consumer choices can positively influence the lives of people working in relevant industries.

IMPACT OF COVID-19

OUR SUPPLY CHAINS AND WORKFORCE

The COVID-19 pandemic and lockdowns continued to exacerbate modern slavery risks globally. In the reporting period, our supply chains continued to experience disruptions and our operations faced challenges with supply chain delays contributing to project delays, lack of available personnel and in some states, for the first half of 2022, prevailing travel restrictions and office closures. However, our people embraced the challenges posed.

In late 2022 we were able to recommence limited international travel for work, meaning factory inspections and in person supplier visits could occur (where doing so did not expose our

staff to unacceptable COVID-19 risk).

This is another important step in our on-going relationships with key suppliers, and our ability to understand, identify and assess modern slavery risk.

The COVID-19 pandemic has also presented opportunities. As working from home was normalised through the pandemic, we have implemented a new working from home policy which allows our employees to work from home 50% of their time over a fortnight. This policy has been well received by employees and contributes to overall workplace satisfaction.

SIGN OFF

This Statement was endorsed by the ESG Committee and approved by the Board of Australian Gas Infrastructure Holdings Pty Limited on 8 June 2023.

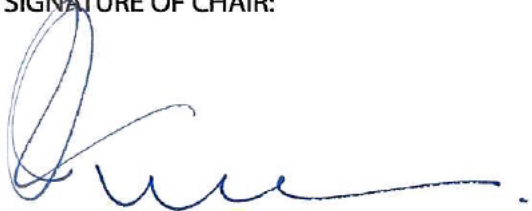
SIGNATURE OF DIRECTOR:



MR CRAIG DE LAINE

This Statement was endorsed by the ESG Committee and approved by the Board of Australian Gas Networks Holdings Pty Limited on 8 June 2023.

SIGNATURE OF CHAIR:



MR PETER TULLOCH

 **Australian Gas
Infrastructure Group**

 Hydrogen
Park

 Dampier Bunbury
Pipeline

 Multinet
Gas Networks

 Australian
Gas Networks