2023 Modern Slavery Statement





#### Important information

Origin Energy Limited is an Australian company (ACN 000 051 696), registered in New South Wales.<sup>1</sup>

We are a leading provider of energy to homes and businesses with interests across energy exploration, production, power generation and retailing. We have extensive operations across Australia, as well as wholly and partly owned subsidiaries in Papua New Guinea and the South Pacific. We have prepared this joint Modern Slavery Statement (Statement) in line with the requirements of the *Modern Slavery Act 2018* (Cth). It explains the actions we have taken to assess and address modern slavery risk exposures in our operations and supply chains during the financial year ending 30 June 2023 (FY2023).<sup>2</sup>

We also hold a 27.5 per cent share in the incorporated joint venture Australia Pacific LNG and act as upstream operator, CSG marketing agent and corporate services provider. Origin's operations and supply chains as upstream operator CSG marketing agent and corporate services provider for Australia Pacific LNG are included in the scope of this Statement ..The Reporting Entities (as defined by the *Modern Slavery Act 2018* (Cth) and covered by this Statement are listed in Appendix A.

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

At 30 June 2023, Origin had 5,630 employees with 369 based at international operations, as well as 270 contingent workers. Origin also has a philanthropic foundation, the Origin Energy Foundation, whose focus is to support programs that use education to help break the cycle of disadvantage for young Australians.

This report may reference significant events occurring after 30 June 2023. Where this report contains forward looking statements, including statements of current intention, statements of opinion and predictions as to possible future events and future financial prospects, these statements are not statements of fact and there can be no certainty of outcome in relation to the matters to which the statements relate.

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

In this statement a reference to 'Origin', 'Origin Energy', 'Group', 'Origin Group', 'Company', 'we', and 'our' is to Origin Energy Limited and the entities listed in Appendix A.
 As defined in the Modern Slavery Act 2018 (Cth) Guidance for Reporting Entities to include: trafficking in persons; slavery; servitude; forced labour; debt bondage; forced marriage; worst forms of child labour; and deceptive recruiting for labour or services.

# <sup>3</sup> Message from our CEO

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As one of Australia's leading energy companies with activities spanning retailing, power generation, renewables and storage development, and natural gas production, we are always mindful of how our decisions can impact others.

This is our fourth Modern Slavery Statement which recognises the UN Guiding Principles on Business and Human Rights, which prioritises the protection of people from risk. Our plan focuses on building our understanding and capabilities, improving our policies and processes, and enhancing engagement with our suppliers.

Energy sits at the core of Australia's decarbonisation story. To get to net zero emissions by 2050 our nation needs to significantly accelerate the build-out of renewables, storage, firming and transmission infrastructure.

We recognise some common renewable technologies contain materials that potentially expose us to exploitative practices in offshore jurisdictions where they are typically manufactured.

Therefore, we aim to work with suppliers and stakeholders who are committed to preventing, identifying and addressing risks to people that may exist in their supply chains. We will continue to build our understanding and capability and to strengthen how we identify and address risks and work collaboratively with our suppliers, customers and the Clean Energy Council and the Human Rights Resources & Energy collaborative to help improve the management of modern slavery risks.

This statement details our activities in FY2O23 and our progress to date.

We remain focused on assessing and addressing the risk of harm to people in our supply chain.

Kar Calabria

**Frank Calabria** Chief Executive Officer August 2023

## Our progress

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- Completed the first social audits of two battery manufacturers with Association of Professional Social Compliance Auditors
   (APSCA) certified auditors.
- Shared modern slavery awareness training with 20 selected local, regional and Indigenous suppliers to build their baseline awareness of modern slavery risk indicators and share our grievance mechanism for escalating concerns.

## About Origin

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#### Who we are

Since listing on the Australian Securities Exchange in 2000, Origin has grown to become one of the largest energy retailers in Australia, one of the country's most significant electricity generators and a major contributor to the domestic economy. At 30 June 2023, we had 5,630 employees with 369 based at international operations, as well as 270 contingent workers.

We have an important role to play in providing energy, including electricity, natural gas, solar and LPG, to more than 4.5 million customer accounts and we work every day to make energy more affordable, more sustainable, smarter and easier.

As a leading Australian energy company, we recognise we have an important role to play in the transition to a low-emissions future. Our ambition is to lead the energy transition through cleaner energy and customer solutions. Our long-term ambition is to be net zero Scope 1, 2 and 3 emissions by 2050.<sup>1</sup>

As well as providing energy, we contribute to local, regional and national communities by paying taxes, providing jobs, purchasing from local suppliers and investing in local infrastructure. We support community initiatives and help to build community skills and employment opportunities through activities such as apprenticeship schemes.

Through the Origin Energy Foundation, our philanthropic foundation, we support programs that use education to help break the cycle of disadvantage and empower young Australians to reach their potential. Since the Foundation's inception in 2010, it has contributed more than \$37 million to the Australian community to meet this objective.

For further information on how Origin contributes more broadly to our community, including the work of the Origin Energy Foundation, please see our 2023 Sustainability Report.



Our values help guide how we make decisions, balance priorities and work together.



• Gender diversity

## <sup>©</sup> Our structure and operations

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For the purposes of this Statement and in accordance with the Modern Slavery Act 2018 (Cth), reference to our operations includes:

- Our direct operations<sup>1</sup> and philanthropic activities, including our employees and contingent workers who operate our business and the employment conditions under which they work.
- Our operations as upstream operator of our joint ventures<sup>2</sup> in Australia Pacific LNG.

Further detail regarding our workforce composition is available within our 2023 Sustainability Performance Data, including:

• Geographic distribution

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- Employees by employment type/contract
- Collective Bargaining Agreement coverage
- Indigenous employees



<sup>1</sup> Contracted solar and contracted wind farms do not form part of Origin's direct operations.

<sup>2</sup> In September 2022, we announced our decision to divest our interest in the Beetaloo Basin, as well as our intention to exit our remaining upstream exploration permits (excluding our interests in Australia Pacific LNG). The sale of our interest in the Beetaloo Basin was completed in November 2022, and we have also entered into agreements to exit our interests in the Canning and Cooper-Eromanga Basins and LPG Pacific.

# Our governance ••••

Everyone at Origin is required to act in accordance with the highest standards of personal safety and environmental performance, governance and business conduct.

The Origin Board is supported by its committees in the oversight of sustainability-related risks and opportunities. The Safety and Sustainability Committee supports and advises the Board on Origin's strategies and performance related to safety and sustainability, including health, safety and environment, climate change and a just transition, human rights, communities, cultural heritage, social impact, compliance, assurance, and disclosures. The Board Risk Committee has responsibility for strategic and emerging sustainability-related risks, including climate change risk.

Further information on our governance framework, including governance around climate-related risks and risk management, can be found in our Corporate Governance Statement and in our Management approaches.

#### Origin Board

Responsible for approval of annual Modern Slavery Statement disclosure

Safety & Sustainability Committee (CEO and non-executive Directors)

Oversight and responsibility for modern slavery governance and disclosures

Executive Leadership Team Assigns responsibilities and monitors risks

#### **Chief Financial Officer**

Executive sponsor

#### Modern Slavery Working Group

Governing forum to manage delivery of key modern slavery activities and actions

#### **Business Units**

Responsible for identifying modern slavery risks and implementing required processes and controls

Origin has a number of policies that set out expectations around conduct and how we manage risks and opportunities, covering topics such as anti-bribery and corruption, diversity, and human rights. These can be found at originenergy.com.au/governance.

### Policies and procedures relevant to identifying, assessing and addressing modern slavery are below:

- Code of Conduct
- Risk Management Policy
- Anti-bribery & Corruption Policy
- Whistleblower Policy
- Procurement and Contract Management Directive
- Human Rights Policy
- Human Rights Remediation Guide
- Supplier self-assessment questionnaire (SAQ)
- Modern Slavery Risk Assessment (MSRA) Procedure
- Supply Chain Traceability (SCT) Tool
- Social Audit Protocol

## Our supply chain

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Our suppliers support our operations across our Energy Markets and Integrated Gas businesses, including our generation assets, gas exploration and production assets and our LPG business. Our suppliers are critical as we strive to deliver affordable, reliable and more sustainable energy solutions to our customers.

Our supply chain is comprised of the procurement of goods and services, commodities and the transportation of energy.

- Our suppliers of goods and services include a wide range of categories such as, but not limited to, wellheads, drilling and power generation equipment, hardware, safety equipment, solar panels, home batteries, personal protective equipment/workwear, call centres, facilities maintenance and construction services.
- Our suppliers of commodities/energy include producers of coal, gas, LPG for resale and renewable energy.
- Transportation of energy/products to customers include shipping, pipelines, energy distribution and network fees.

Whilst we have a global supply chain, 91 per cent<sup>1</sup> of our direct spend is with organisations registered in Australia.





#### Number of suppliers by region

Australia 3,521
North America 102
Europe 70
Asia 46
Oceania (excl Aust) 19

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

### ⊚ Our approach

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### Respecting human rights and actions to assess and address modern slavery

Origin acknowledges the applicability of the United Nations Guiding Principles to protect, respect and remedy human rights as well as the eight fundamental Conventions of the International Labour Organisation (ILO), as reflected in our Human Rights Policy.

As outlined in this policy, we acknowledge:

- the ILO Declaration on Fundamental Principles and Rights at Work (which contains the eight core conventions of the ILO, including freedom of association, the right to collective bargaining, the elimination of discrimination in respect of employment and occupation and the effective abolition of child labour);
- the ILO Indigenous and Tribal Peoples Convention 169 and the UN Declaration on the Rights of Indigenous Peoples; and
- the UN Guiding Principles on Business and Human Rights.

We respect fundamental human rights by conducting ourselves and our business with due care and in accordance with relevant laws and regulations.

In FY2023, we undertook an internal assessment of our salient human rights issues, supported by an external human rights expert review where modern slavery was confirmed as a key focus. This assessment will be used to assist in prioritising our areas for focus in FY2024 and beyond. Additionally, our Supplier Code sets out our expectation that suppliers comply with all applicable laws and demonstrate their respect for, and protection of, the fundamental human and labour rights of workers.

In relation to modern slavery, our Supplier Code requires that all workers have:

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

In FY2023, we developed and published our Social Audit Protocol to outline our expectations when assessing the working conditions and human and labour rights protections at supplier sites. Our Social Audit Protocol assists us in determining if our suppliers are complying with our Supplier Code.



## Our risk management process

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#### Our four-step methodology

Management of our human rights risks, including modern slavery, is underpinned by our Human Rights Policy and Risk Management Framework, with oversight from the Origin Board's Risk and Safety and Sustainability Committees. For further information on our Risk Management Framework, refer to our FY2023 Operating and Financial Review.

In FY2023, we continued to apply our four-step methodology to assess and address modern slavery risks in our operations and supply chain.

| Four-ste | p methodol | oqy |
|----------|------------|-----|
|          |            |     |

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

This methodology is outlined below:

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

Origin recognises the UN Guiding Principles Reporting Framework, which illustrates the importance of considering salient human rights risks. These are human rights at risk of the most severe and likely, actual or potential, negative impact through the company's activities and business relationships.

This concept of salience focuses the lens of risk on people which directs our Risk Appetite Statement and guides decisions and priorities of our Modern Slavery Working Group and our policies and procedures, like our MSRA Procedure, SCT Tool and Social Audit Protocol.

We also recognise the UN Guiding Principles on Business and Human Rights' continuum of involvement. We understand that our operations and supply chain could cause, contribute or be directly linked to adverse impacts to people, such as modern slavery practices, with examples of possible scenarios outlined below:

#### Cause

Risks that our operations may directly result in modern slavery practices

#### Contribute

Risks that our operations and/or actions in our supply chain may contribute to modern slavery, e.g. through acts or omissions that facilitate or incentivise modern slavery

#### **Directly linked**

Risks that our operations, products or services may be connected to modern slavery through the activities of another entity we have a business relationship with An example where Origin could cause modern slavery:

Exploited labour is used as crew within shipping operations, where they are not free to leave the vessel.

An example where Origin could contribute to modern slavery:

A direct apparel supplier has set an unrealistic cost target and delivery timeframe that can only be met through exploited labour.

An example where Origin could be directly linked to modern slavery:

An indirect supplier in the extended supply chain is used to source electrical components assembled using child labour in hazardous conditions.

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

- **High-risk countries of operation** countries or regions reported to have a high prevalence of modern slavery and poor legislated labour rights protections.
- **High-risk categories or sectors** development and delivery of product or services have been reported as involving labour exploitation.
- **Resources used in goods** components used in goods are reported to involve a high risk of labour exploitation.
- Type of workforce/employment arrangements prevalence of unskilled, temporary or seasonal labour and deceptive recruitment practices which target vulnerable and marginalised individuals and groups.

We understand that multiple risk factors potentially influence the nature and extent of modern slavery practices, particularly when these factors intersect.

#### **Our Priority Risk profile**

To assist us in identifying which suppliers to prioritise for increased assurance, we established a Priority Risk profile which considers the presence of intersecting modern slavery risk factors. This profile was developed in FY2022 and is used to help us select the suppliers we engage using our SCT Tool.

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

#### **Our operations**

We have previously identified that our wholly and partly owned subsidiaries operating in the Pacific Islands represented the highest potential exposure to modern slavery within our operations. In November 2022, we entered into an agreement to sell our LPG business in the Pacific, which includes our wholly-owned operations in Vanuatu, American Samoa, Samoa and Cook Islands, and joint-venture operations in Fiji, Papua New Guinea and the Solomon Islands. In light of this development, external assurance activities were paused pending completion of this sale agreement. However, we continued to apply Origin standards relating to modern slavery locally.

We also recognise that while contingent workers represent just under 5 per cent of our total workforce, these workers can face increased inherent risk of modern slavery type practices. That is in FY2021 we worked with our primary supplier of contingent labour to assess their controls and found their processes to be mature.

#### Our supply chain

To better understand the potential modern slavery exposure in our supply chain we apply a number of tools and reviews to continually assess:

- our supply chain spend;<sup>1</sup>
- our vendor SAQ results;
- our suppliers' risks and controls identified through our MSRA Procedure, SCT Tool and Social Audit Protocol;
- our suppliers' own modern slavery statements;
- business conduct data gathered through third party ESG tools and risk platforms; and
- by monitoring key government and non-government organisations reporting on modern slavery trends and good practice.

In FY2023, we continued to conduct analysis of our nearly 3,800 direct suppliers. We applied the following principles to identify suppliers of goods and services with these risk factors, and to help inform our Modern Slavery Maturity Plan actions.

Our assessment principles include:

- Contribute vs directly linked<sup>2</sup> instances where Origin is at risk of contributing to modern slavery practices are prioritised over instances where Origin may be directly linked.
- Direct vs extended supply chain risks that exist within Origin's supply chain where we have a direct commercial relationship are prioritised over relationships in the extended supply chain where we have less influence.
- **Location** goods manufactured offshore in higher risk countries are prioritised over onshore manufacturing due the higher inherent risk to people working in modern slavery type practices. Onshore services known to be higher risk for modern slavery are prioritised over offshore services.
- **Materiality** high-risk categories where the spend for the product/service is material to Origin and we are more likely to have influence to make a positive impact on the supply chain of our suppliers.

<sup>&</sup>lt;sup>1</sup> Supply chain spend is approximate annualised third party spend excluding taxes, government charges, joint venture, intercompany transfers and landowner compensation payments.

<sup>&</sup>lt;sup>2</sup> Cause, contribute or directly linked in this statement are as defined in the UN Guiding Principles for Business and Human Rights.

#### Applying our Modern Slavery Risk Management Toolkit

Our Modern Slavery Risk Management Toolkit is designed to assess the inherent risk of modern slavery type practices occurring within our supply chain. The Toolkit is an integrated set of tools which are applied through four stages to provide a tiered framework for engaging with suppliers with higher inherent risk to modern slavery to determine how well they are managing the risks in their own operations and supply chain. Our toolkit allows us to perform increasingly deeper analysis at each stage, focusing our efforts on suppliers with the highest risk.

The below provides a snapshot of the four stages and our progress in FY2023 at each of the stages.



#### **Our supplier risk profiles**

Through our assessments in FY2023 we identified:

- Inherent high-risk suppliers 271 suppliers were identified with one or more supplier risk factors, as shown in Table 1, no change from FY2022, which equates to 7% of our total direct suppliers.
- Priority Risk suppliers 3 suppliers were identified as having intersecting risk factors, which equates to less than 0.1% of our total direct suppliers.

#### Table 1: Suppliers by risk profile grouping

| Supplier profile          | Higher risk<br>supplier profile  | Number of suppliers <sup>1</sup> | Key high-<br>risk countries <sup>2</sup> | Key categories  | Modern slavery<br>risk examples    |
|---------------------------|--|----------------------------------|--|---|------------------------------------|
| Direct<br>Manufacturing   | Suppliers that<br>manufacture goods<br>in a country with<br>higher risk of modern<br>slavery practices.  | 33                               | China, Saudi Arabia                      | Drilling and exploration<br>equipment, electrical<br>equipment, renewable<br>energy equipment<br>(including solar panels<br>and batteries). | Forced labour                      |
| Indirect<br>Manufacturing | Suppliers that<br>distribute goods likely<br>to be manufactured<br>in a country with<br>higher risk of modern<br>slavery practices.  | 178                              | China, Vietnam                           | Information technology,<br>energy devices,<br>mechanical equipment.   | Unpaid labour                      |
| Onshore Services          | Suppliers relying on<br>or providing a service<br>in a category known<br>to have a higher risk<br>of modern slavery<br>practices in Australia.                                     | 44                               | Australia                                | Construction services,<br>facilities and site<br>management (including<br>cleaning, security and<br>camp management).                       | Bonded labour                      |
| Offshore Services         | Suppliers that rely on or<br>supply services based<br>in a country with<br>higher risk of modern<br>slavery practices.   | 10                               | China, Papua New<br>Guinea, Vietnam      | Professional services<br>(including IT service<br>providers and<br>call centres).   | Deceptive<br>recruitment practices |
| Commodities               | Suppliers that provide<br>goods that contain one<br>or more commodities<br>known to be high-<br>risk of modern<br>slavery practices such<br>as cobalt, lithium<br>and polysilicon. | 182                              | China, Democratic<br>Republic of Congo   | Emerging technology,<br>electrical equipment,<br>electric vehicles,<br>and renewable<br>energy equipment.                                   | Child labour                       |

1 Some suppliers appear in multiple profiles, there are 271 distinct suppliers across the 5 profiles.

2 According to modern slavery related country vulnerability and risk indices, including the Global Slavery Index - globalslavery index.org. Geographic locations where we could be more highly exposed in our own operations include, but are not limited to, Fiji and Solomon Islands. Suppliers that manufacture in countries associated with a higher risk of modern slavery practices include, but are not limited to, China and Saudi Arabia.



Direct manufacturing: China, Saudi Arabia

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- Indirect manufacturing: China, Vietnam
- Offshore services: China, Papua New Guinea, Vietnam

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

#### **Building our understanding and capabilities**

During FY2023, we improved our understanding of, and capability to manage, modern slavery risks by:

• **Executive engagement** - we continued to present the risks of modern slavery throughout our extended supply chain to the Executive Leadership Team. This included reviewing the risk inline with our Risk Appetite Statement and developing a further two-year Modern Slavery Maturity Plan outlining key deliverables across FY2023 and FY2024.

#### **Delivering our training strategy**

We recognise our team working with suppliers every day have the greatest opportunity to assess and address modern slavery within our supply chains. In FY2023, we continued to deliver our tiered modern slavery training strategy to upskill people across the business:

- 100 per cent of employees completed our Code of Conduct training, which includes baseline awareness of modern slavery type practices at induction.
- 110 employees completed our tailored modern slavery risk management training module. The training was developed in FY2023 to support procurement and wholesale trading team members undertake enhanced contract preaward due diligence by applying the tools and risk management platforms within our strengthened MSRA, including developing corrective action plans.
- 10 employees completed our modern slavery awareness training for contract owners; and
- 471 employees completed contract management essentials training.
- Improved modern slavery awareness across the business in addition to dedicated training, and to coincide with World Day Against Child Labour, we promoted ongoing employee awareness and vigilance through an internal communications campaign. We updated content on our intranet and knowledge management hub and Workplace communications channel with nearly 900 unique visitors across Origin.
- Understanding emerging trends and expectations with guidance from third parties, we undertook internal and an external gap analysis against a particular customer and suppliers to better understand emerging trends and expectations and continue to improve our policies and processes.

- **Collaborating with our peers** we continued to engage with our industry peers to pursue collaborative approaches to global challenges facing the energy industry through two key forums:
  - Human Rights Resources and Energy collaborative (HRREc), a group of Australian energy and resources companies that share learnings, challenges and develop practical tools to identify and address modern slavery in supply chains. See our Case Study, page 19; and
  - Clean Energy Council's (CEC) Risk of Modern Slavery Working Group where we continued to support the CEC's Modern Slavery Pledge, which we signed in FY2022.
- Building capability and prioritising our efforts through our Modern Slavery Working Group – with 27 representatives from teams across the business, including People & Culture, Energy Markets, Integrated Gas, LPG, Wholesale Trading, Origin Zero, Future Energy, Legal and Risk as well as Finance, Strategy and Procurement, the Modern Slavery Working Group met quarterly to share internal learnings, challenges and promote a wholeof-Origin approach in delivering against our modern slavery action plan.

Key topics of discussion in FY23 included:

- Understanding salient human rights and their identification within Origin
- Procurement case studies from application of our SCT Tool
- Modern slavery due diligence in battery supply chains
- Australian and international legislative updates
- Updates from our industry engagement activities and initiatives with CEC and HRREc

Four sub-committees also met regularly to focus on specific actions in identifying, assessing and addressing risk to people as relevant to key business activities such as procurement, commodities and shipping. The work of the Modern Slavery Working Group continues to be reported to and monitored by Origin's Executive Leadership Team.

• **Conducting a salient human rights assessment** - our Modern Slavery Working Group completed an assessment to identify Origin's salient human rights issues, one of which is modern slavery. This assessment has also been subject to an external third-party review.

#### Improving our policies and processes

We targeted improvements in our existing policies and processes, as well as developing new practices:

- Human Rights Policy we completed our update of our peoplerelated policies to improve their alignment with our Human Rights Policy.
- Priority Risk profile to assist us in identifying suppliers to prioritise for potential assurance, we established a 'Priority Risk' profile which considers the presence of intersecting modern slavery risk factors. This profile was used to help us select the suppliers we engaged in FY2023 using our SCT Tool.
- Engaged specialist consulting advice to undertake review of our salient human rights assessment, improve our risk assessment processes and complete benchmark and gap analysis assessment against key suppliers.
- Published our Social Audit Protocol we worked with HRREc to develop an industry aligned shared principles document and FAQ guide. This was utilised to develop our standalone Social Audit Protocol to set clear expectations with suppliers and counterparties.
- Strengthened our MSRA we integrated our SCT tool and Social Audit Protocol into our MSRA to increase our contract pre-award due diligence processes for suppliers with higher risk exposure to modern slavery type practices. We also mandated use of the MSRA in our Procurement Directive for purchases of renewable energy solutions.
- Maintained current screening for new suppliers through our Modern Slavery Risk Management Toolkit, including reviewing against Walkfree's 5th Global Slavery Index, published in May 2023.
- Continued to monitor our Priority Risk profile to ensure it continues to capture our highest risk suppliers.
- Improved our risk assessment Joined Sedex in June 2023, a leading ethical trade platform to manage supply chain risk and facilitate improvements through social audits.
- Improved screening of wholesale counterparties we updated our Know Your Counterparty risk screening tool to improve modern slavery risk identification, and increased the screening frequency for counterparties identified as posing a higher inherent risk of modern slavery within their own operations or extended supply chain.

#### Enhancing engagement with our suppliers

In FY2022, we acknowledged that the transition to renewable energy technologies may pose modern slavery challenges (see Case Study, Page 15 of FY2022 Modern Slavery Statement). In FY2023, we actively championed opportunities to work with suppliers of solar panels, batteries and inverters to build our understanding of modern slavery risks and controls (further detail in the case study on page 20) by:

- **Applying our MSRA** aligned with our Procurement strategy we continued to build visibility and traceability of our supply chain to tier 3 for Priority Risk suppliers. We commenced 21 assessments with direct and indirect suppliers of renewable energy technology. We aim to complete this for all Priority Risk suppliers by FY2026.
- Building relationships with third parties we developed relationships with five social auditors accredited by Association of Professional Social Compliance Auditors (APSCA) to facilitate independent social audits.
- Applying our Social Audit Protocol in line with our Social Audit Protocol, we undertook two SMETA 4-Pillar audits of battery suppliers; one within Australia and one based in Europe (see the case study on page 21).
- Supporting small business suppliers to help them meet Origin's Supplier Code requirements and better manage our shared supply chain risks. With a focus on capacity building, we developed specific modern slavery training for local, regional and Indigenous suppliers to build their awareness and understanding on the risks and indicators of modern slavery type practices. We shared this with a pilot group of 20 suppliers, of which 11 elected to voluntarily complete the training.

Within our LPG business, following Origin entering into an agreement to sell our LPG business in the Pacific, we have prepared for the consolidation of our LPG shipping counterparties to a single ship owner and single crewing agent (subject to completion of the sale agreement). We have commenced engagement with these counterparties to update existing agreements, to reflect proposed enhanced modern slavery due diligence activities including use of an industry crew welfare assessment.

#### 4 Review the effectiveness of our actions

In FY2023, we continued to mature the policies and procedures first developed in FY2020, previously focussing on the identification and segmentation of suppliers by risk profile. We actively collaborated with our suppliers and the broader resources and energy industry to understand emerging trends and best practices in effectively managing our risks. In particular, we strengthened our MSRA and prioritised our effort on building relationships, transparency and visibility in the extended supply chains of renewables manufacturers to deep dive on the risk. We regularly review and assess the effectiveness of our policies, codes, standards and procedures as part of our Risk Management Framework.

#### Measuring our progress

We continue to monitor progress against the areas identified in our FY2022 Modern Slavery Statement as our focus for FY2023 and beyond.

|  | What we said we would focus on   | What we did in FY23  |
|--|--|--|
| Building our understanding<br>and capabilities | <ul> <li>Continuing to build the capability and competency of<br/>our Procurement and Contract Management teams<br/>to identify, assess and address modern slavery risks in<br/>their dealings with our suppliers.</li> </ul>  | employees completed dedicated MSRA training.   |
|  | <ul> <li>Working closely with industry peers and suppliers<br/>to build our understanding of modern slavery risks<br/>across the breadth of the renewable energy industry.</li> </ul>  | • Worked with 21 suppliers to understand who forms their extended supply chains and where they operate   |
|  | • Returning to in-person engagement with our LPG<br>Pacific assets operating in inherently high-risk<br>countries to ensure adequate controls are in place.<br>Similarly, when COVID-19 travel restrictions allow,<br>schedule in-person engagement with our high-risk<br>international suppliers. | • External assurance activities with our LPG Pacific operations were paused pending the current sale process being completed. Within our supply chain, we completed our first international supplier social audit in Europe.   |
|  | <ul> <li>Commencing an internal assessment of our salient<br/>human rights issues to understand which rights<br/>are at risk of the most severe negative impact for<br/>our activities.</li> </ul>   | <ul> <li>Completed an internal assessment of our salient<br/>human rights issues, supported by external review.</li> </ul>   |
|  | <ul> <li>Continuing to present regularly to the Executive<br/>Leadership Team and the Board to ensure the risks<br/>of modern slavery for Origin are well-understood.</li> </ul>   | • Presented to the Executive and Safety and Sustainability Committees.   |
| Improving our policies<br>and processes        | <ul> <li>Reviewing our Human Rights Policy and<br/>Human Rights Remediation Guide to ensure<br/>ongoing effectiveness.</li> </ul>  | • We commenced a review of our Human<br>Rights Policy, and will continue to review our<br>Human Rights Remediation Guide as any adverse<br>impacts are identified. Our grievance mechanism,<br>ConcernLine, did not receive any modern slavery<br>related disclosures. |
|  | <ul> <li>Refreshing our Modern Slavery Risk Management<br/>Toolkit (including Our Supplier Code) to build on the<br/>learnings identified in the first two years of application.</li> </ul>  | <ul> <li>Refreshed our Modern Slavery Risk Management<br/>Toolkit by simplifying our MRSA, embedding Supply<br/>Chain Traceability into contract pre-award process<br/>and developed our Social Audit Protocol.</li> </ul>   |
|  | <ul> <li>Investigating opportunities to align due diligence of<br/>our shipping counterparties with industry initiatives.</li> </ul>   | <ul> <li>Prepared for the consolidation of our LPG shipping<br/>counterparties to a single ship owner and single<br/>crewing agent (subject to completion of the<br/>sale agreement).</li> </ul>   |

|  | What we said we would focus on   | What we did in FY23  |
|--|--|--|
| Enhancing engagement with<br>our suppliers | <ul> <li>Championing opportunities to partner with suppliers<br/>of renewable energy products to contribute to the<br/>creation of supply chains free from components and<br/>materials produced in high-risk geographies.</li> </ul>                          | • Worked with eight suppliers of solar panels as outlined in Case Study on page 20.  |
|  | <ul> <li>Providing further support to our small business<br/>suppliers, to help them meet Origin's requirements<br/>and better manage our shared supply chain risks.</li> </ul>  | • Shared dedicated modern slavery eLearning with 20 targeted small-medium enterprises.   |
|  | <ul> <li>Supporting our identified high-risk suppliers to<br/>follow through on improvement actions identified<br/>and overcome the challenges in obtaining supply<br/>chain transparency.</li> </ul>  | • Assisted battery supplier close 18 improvement actions following a social audit, as outlined in Case Study on page 21.   |
|  | <ul> <li>Actively collaborating with the CEC and HRREc<br/>working groups to build our capability and develop<br/>industry approaches to managing modern slavery<br/>risks including common supplier standards and<br/>processes where appropriate.</li> </ul> | • Participated in an industry consultation of the Modern<br>Slavery Act and proposed recommendations through<br>both CEC and HRREc groups, and utilised HRREc<br>guidance as basis for our own Social Audit Protocol, as<br>outlined in Case Study on page 19. |

#### **Consultation and collaboration**

Our key consultation and collaboration activities in FY2023 included:

- continuing to engage with our Australia Pacific LNG downstream operator to share insights into the shared and unique risk across the Australia Pacific LNG joint venture's operations;
- contributing to drafting and development of CEC's Addressing Modern Slavery in the Clean Energy Sector report in November 2022; and
- developing our Social Audit Protocol, aligned with HRREc's guidance, to develop industry approach to social audit practice.

Our assessments to date have not identified any modern slavery practices in our own operations or direct supply chain however, as outlined in this Statement there is a high likelihood of modern slavery issues in some products manufactured by renewable energy suppliers, further information is outlined in the Case Study on page 20. Identifying these practices requires vigilance and we will continue to apply our Modern Slavery Risk Management toolkit and work with suppliers, developing deeper supply chain transparency.

Through this ongoing review of our key activities, we have identified several key learnings that have informed our future priorities. These include:

- the importance of continuing to build the knowledge and capability of procurement and contract management staff to identify, assess and manage modern slavery risks;
- the benefit of mature third-party tools for semi-automated detection and management of these risks;
- continuing to seek external reviews to improve disclosure of risks and the steps we've taken to address them; and
- the importance of relationships with our direct suppliers, who share our values, to help us build visibility through our extended supply chain.

#### Our grievance mechanism

Origin utilises an external confidential grievance mechanism, the Origin ConcernLine.

#### **Origin ConcernLine**

In FY2023 the Origin ConcernLine received **9** disclosures; of these **0** related to whistleblowers and **0** related to modern slavery.

Origin's Human Rights Policy sets out our commitment to remedy adverse human rights impacts, where appropriate, in line with the UN Guiding Principles on Business and Human Rights. Our Human Rights Remediation Guide supports this commitment through:

- requiring the reporting of suspected human rights breaches;
- allows for human rights concerns to be reported through Origin ConcernLine;
- requires the investigation of reported concerns and action with consideration for the protection of affected persons;
- provides guidance on appropriate remediation; and
- requires that prevention of further harm and actions to address root causes are considered.

# Case Study - Collaborating with industry

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### Practitioner-led collaboration is important to Origin

We work with Human Rights Resources and Energy Collaborative (HRREc) and Clean Energy Council (CEC) to develop industry responses to tackle modern slavery. We share an appreciation that modern slavery is a salient human rights issue, whose complexity requires a broader industry and community response. For this reason, we see power in collaboration and coordination for meaningful action to take place through market signals.

#### Human Rights Resources and Energy Collaborative

HRREc was formed in 2019 by practitioners committed to respecting human rights in our respective businesses and, addressing modern slavery risks in our operations and supply chains. It is a forum where practitioners can share learnings, challenges, develop best practice and align industry responses for respecting human rights.

#### Key actions in FY2023 included:

- Development and launch (with the Walk Free Foundation) of a Modern Slavery Response and Remedy Framework, which is designed to provide practical guidance to assist companies with their response to modern slavery or related exploitation in their supply chains or operations.
- Development of guidance on social auditing in supply chains to promote a consistent, clear and effective approach for companies and suppliers in the industry and to use as training and awareness raising.
- Contributed to the submission to the Australian Government-led review of the Modern Slavery Act 2018 (Cth) in March 2023.

#### **Clean Energy Council**

CEC is the peak body for the clean energy industry in Australia, with more than 1,000 members. It works with Australia's leading renewable energy and energy storage businesses to support them in accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

#### Key actions in FY2023 included:

- Continued collaboration with peers in the Risk of Modern Slavery Working Group to develop an industry position and response.
- Contribution to the *Addressing Modern Slavery in the Clean Energy Sector* report, published in in November 2022.
- Contributed to the submission to the Australian Government-led review of the Modern Slavery Act 2018 (Cth) in March 2023.

# Case Study - Working with renewable energy suppliers

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#### Background

Origin is aware of growing reports of modern slavery risks in the production of renewable energy components, particularly in the manufacture of lithium-ion batteries, photovoltaic solar panels and, to some extent, wind turbines. These reports suggest risks that participants across the renewables value chains, from manufacturers and distributors, through to buyers, investors and professional services firms may rely on components made through forced labour or involving other forms of modern slavery.

In FY2021, we commissioned a report on these risks and in last year's Modern Slavery Statement we expanded on our findings and committed to deepen relationships with suppliers and build new levels of transparency throughout all tiers of the supply chain. We recognise the greatest risk to people exposed to modern slavery is likely to be embedded deep within the extended supply chain.

#### Further research on solar panels

In FY2023, we issued a request for information to eight suppliers of solar products to obtain traceability and visibility of their extended supply chain to assess exposure to modern slavery type practices for panels suitable across three specific markets:

- Residential and small-medium enterprise
- Commercial and industrial
- Grid-scale

We sought to understand suppliers' labour rights protections, including any social audits they had completed in last 12 months, how these suppliers meet the import obligations of other jurisdictions, as well as their technical and manufacturing capabilities. This engagement included meetings between the procurement team and the eight suppliers as well as members of Origin's Executive Leadership team and our existing major solar panel suppliers to discuss the information provided in detail.

Each of the eight manufacturers have different levels of vertical integration. Some share suppliers in their extended supply chains and cumulatively source components from manufacturers based in China, Malaysia, Thailand, Vietnam, Taiwan, Japan, United States, Mexico and Germany. Through this process we have gained visibility and traceability of which organisations form the extended supply chain down to the silicon level and in which countries they operate.

Simplified solar panel supply chain below.



#### Other renewable energy products

As Origin looks to accelerate the uptake of renewable and cleaner energy solutions, we conducted a comprehensive risk assessment of wind turbine technologies and the associated international supply chains. We identified that balsa wood sourced for the blades as well as rare earth elements can be exposed to modern slavery type practices in the extended supply chain of wind turbine manufacturers based Denmark, China, United States, India, Spain and Germany.

We also completed risk assessments of grid-scale battery providers to determine supply chain transparency and examine potential modern slavery risks.

In FY2023, we commenced 21 assessments with direct and indirect suppliers of renewable energy technology.

#### **Informed planning**

This research has provided valuable input into our proposed actions for FY2024, including engaging with short-listed suppliers who meet our values and provide renewable energy products demonstrably free from modern slavery type practices.

We will continue to engage with other key industry members, including manufacturers of renewable energy components, and the CEC and HRREc to further develop supply chain transparency to assist us in assessing and addressing modern slavery in our renewable energy supply chains.

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# Case Study - Working with suppliers to build capability

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In FY2023, we undertook our first two social audits in line with Origin's focus on working with suppliers of renewable energy products to contribute to the creation of supply chains free from components and materials produced in high-risk geographies. Our first social audits were of two battery manufacturers under our newly developed Social Audit Protocol.

#### Our approach to social audits

Social audits are performed whenever further supplier assurance is required. They may be initiated before or during the contract and at any of the stages in our Modern Slavery Risk Management Toolkit. We select suppliers to participate in a social audit where a variety of risk indicators intersect in a supplier's operations or within their supply chains.

#### Audit standards

Sedex Members Ethical Trade Audit (SMETA) 4-pillar audits were undertaken by members of the Association of Professional Social Compliance Auditors. These audits reviewed responsible business practices against standards set by the Ethical Trading Initiative Base Code, universal rights covering UNGPs, and local laws.

They also assessed management systems, responsible recruitment, entitlements to work, sub-contracting, environment, business ethics and organisation supplier codes. The scope of the audits covered all workers including direct employees and workers employed by service providers or other contractors.

The audit findings were summarised in SMETA Corrective Action Plan Reports with non-conformance, observations and good examples highlighted to provide overall balance.

#### Collaboration and improvement, rather than compliance

In one of the audits, 22 non-conformances were identified and although none were considered to be modern slavery type practices, the audit process provided the proactive opportunity to work with the supplier to identify and assess the risks to modern slavery early. The Australian-based organisation and Origin together sought to address these issues collaboratively. This reflects our approach to supplier relationship management with organisations who share Origin's values, such as this manufacturer, which was keen to learn and improve its operations.

With guidance from a leading sustainability firm, we worked with the supplier to successfully verify the remediation of 18 non-conformances in less than 90 days, which were confirmed through a further audit. The remaining four issues are in progress and on track to be resolved.

This was a valuable learning experience for both Origin and the battery manufacturer, building trust and strengthening our ongoing engagement in delivering renewable energy to our customers.

# Our consultation and approval process

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Our consultation process to deliver the actions in this Statement was managed through four key mechanisms:

- Our Modern Slavery Working Group: Origin corporate functions provide oversight and support across all controlled entities, including the 11 Reporting Entities within the group (as outlined in Appendix A). Our Modern Slavery Working Group includes representatives with accountability across Origin to enable appropriate consultation between group entities and delivery of activities. Representation is reviewed annually and activities prioritised on the areas more highly exposed to risks of modern slavery practices.
- Our largest joint venture: Origin representatives regularly collaborate with representatives from Australia Pacific LNG to build understanding and capability and enable alignment of the Statements published across joint venture parties. In 2023, we continued our participation in the collaboration forum between the operators of Australia Pacific LNG, to enhance our understanding of practices across the joint venture.

- **Our Executive Leadership Team**: Endorses our Modern Slavery Maturity Plan and monitors delivery and outcomes.
- Our Safety and Sustainability Committee: Reviews and has oversight of the internal audit outcomes and proposed improvement actions.

Our Executive Leadership Team has also been involved in the approval process of the compilation of this Statement and the Statement for approval by the Board. The Statement was approved by the Board on 16 August 2023 and is signed by the Chief Executive Officer.



## Looking ahead

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Origin respects fundamental human rights by conducting ourselves and our business with due care and in accordance with relevant laws and regulations. We continue to focus on building our understanding and capabilities, improving our policies and processes, and enhancing engagement with our suppliers.

We are aware that the transition to renewable energy increases the risk of modern slavery in our supply chain and we will continue to explore ways in which Origin can contribute to identifying and addressing modern slavery in global renewable energy supply chains. We believe that collaboration across industry and with key suppliers is key to developing broader solutions and we will continue to play a leading role in forums such as CEC and the HRREc.

Our key focus areas for FY2024 and beyond are outlined below:

#### 1. Building our understanding and capabilities

- Continuing to work closely with industry peers and suppliers to build our understanding of modern slavery risks across the breadth of the renewable energy industry.
- Continuing to present regularly to the Executive and the Board to
  ensure the risks of modern slavery for Origin are well-understood.
- Continuing to build the capability and competency of all Origin team members to identify, assess and address modern slavery risks in our dealings with counterparties and suppliers.

#### 2. Improving our policies and processes

- Reflecting the outcomes from our salient human rights assessment in our policies and processes.
- Exploring opportunities to strengthen our due diligence approach for both existing and prospective counterparties.
- Conducting further modern slavery due diligence for investment decisions and business relationships.
- Improving labour rights assessments for site audits for solar installers.

#### 3. Enhancing engagement with our suppliers

- Working with prioritised suppliers to implement the Sedex risk management platform.
- Supporting our identified high-risk suppliers to follow through on improvement actions identified and overcome the challenges in obtaining supply chain transparency.
- Working with suppliers of renewable energy products to contribute to the creation of supply chains free from components and materials produced in high-risk geographies.
- Actively collaborating with the CEC and HRREc working groups to build our capability and develop industry approaches to managing modern slavery risks including common supplier standards and processes where appropriate.

### Appendix A: Reporting entities covered by this statement

This joint Modern Slavery Statement covers the activities, operations and extended supply chains of Origin Energy Limited ABN 30 000 051 696 and all of our controlled entities for the period 1 July 2022 to 30 June 2023 (FY2023). Refer to our Annual Report and Sustainability Report for further details including our list of controlled entities.

Reporting entities classified under the definition of the Commonwealth Modern Slavery Act 2018 listed below. Relevant Reporting Entities with Consolidated revenue >\$100m:

| Entity                              | Registration       |
|-------------------------------------|--------------------|
| Origin Energy Limited               | ABN 30 000 051 696 |
| Origin Energy Holdings Pty Ltd      | ABN 30 004 132 423 |
| Origin Energy LPG Ltd               | ABN 77 000 508 369 |
| Origin Energy Retail Ltd            | ABN 22 078 868 425 |
| Origin Energy (Vic) Pty Ltd         | ABN 11 086 013 283 |
| Origin Energy Electricity Ltd       | ABN 33 071 052 287 |
| WINconnect Pty Ltd                  | ABN 71 112 175 710 |
| Origin Energy LNG Portfolio Pty Ltd | ABN 88 610 626 750 |
| Origin Energy Power Ltd             | ABN 93 008 289 398 |
| Origin Energy Eraring Pty Ltd       | ABN 31 357 688 069 |
| OE JV Co Pty Ltd                    | ABN 38 095 483 195 |

### Appendix B: Addressing the mandatory reporting criteria

| Australian Modern Slavery Act mandatory reporting criterion  | Reference in this statement   |
|--|---|
| Identify the reporting entity  | Important information, About<br>Origin, Reporting Entities Covered<br>by this Statement (see page 2),<br>(see page 5), (see page 24)  |
| Describe the reporting entity's<br>structure, operations and<br>supply chains  | Our structure and operations, Our<br>supply chain (see page 6) - (see<br>page 8)  |
| Describe the risks of modern<br>slavery practices in the operations<br>and supply chains of the reporting<br>entity and any entities it owns<br>or controls  | Assess modern slavery risk factors<br>for our operations and supply<br>chain, Prioritise focus areas within<br>our operations and supply chain<br>for further due diligence (see page<br>10), (see page 11) |
| Describe the actions taken by the<br>reporting entity and any entities<br>that the reporting entity owns or<br>controls to assess and address<br>risks, including due diligence and<br>remediation processes | Take action to address the risks<br>of modern slavery practices,<br>Consultation and Collaboration,<br>Case Studies (see page 15), (see<br>page 18), (see page 19), (see page<br>20), (see page 21)         |
| Describe how the reporting entity<br>assesses the effectiveness of<br>such actions   | Review the effectiveness of our actions (see page 17)   |
| Describe the process of<br>consultation with any entities the<br>reporting entity owns or controls;<br>and, for a reporting entity covered<br>by a joint statement, the entity<br>giving the statement       | Consultation and collaboration,<br>Our consultation and approval<br>process (see page 18), (see<br>page 22)   |
| Include any other information<br>that the reporting entity, or<br>the entity giving the statement,<br>considers relevant   | Reporting entities covered by this statement (see page 24)  |

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ΕY

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#### Where all good change starts

Further information about Origin's performance can be found on our website:

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