

# Modern Slavery Statement

## 2024

## MESSAGE FROM OUR CHAIR AND CHIEF EXECUTIVE OFFICER

We are proud to present ActewAGL's Modern Slavery Statement for 2024. This document reflects our ongoing commitment to understanding, identifying, and mitigating modern slavery risks within our business operations and supply chain.

As a key employer in our region and a vital part of the community, we hold ourselves to the highest ethical standards, meeting the expectations of our customers and the community. Modern slavery in any form is intolerable, and we are dedicated to taking all necessary measures to prevent it.

Over the past year, we have intensified our efforts to ensure a comprehensive framework for managing the risks and impacts of modern slavery. Our approach includes:

- **Raising awareness and building capability:** Educating and empowering our employees to recognize and address modern slavery risks.
- **Enhancing internal processes:** Continuously improving our procedures, including robust whistleblower protections, to ensure accountability and transparency.
- **Strengthening supplier engagement:** Collaborating closely with our suppliers to ensure they adhere to our ethical standards and align to our Supplier Code of Conduct.

Key advancements in the past twelve months include:

- **Collaborative industry efforts:** Partnering with industry peers to refine the risk assessment tool, enhancing visibility into vendor supply chains.
- **Rigorous supplier onboarding:** Requiring all new suppliers to complete a modern slavery risk assessment, regardless of their size.
- **Expanded vendor assessments:** Increasing the number of existing suppliers undergoing modern slavery risk assessments. Over 500 suppliers have now completed these assessments, providing detailed insights into their supply chains and ensuring that modern slavery risks are properly identified and managed.

Despite our progress, we recognise that modern slavery remains a global issue affecting millions. Its eradication demands ongoing commitment and vigilance. We will continue to invest in our people and processes, working collaboratively with our suppliers to effectively identify and address modern slavery risks across all facets of our business.

This Modern Slavery Statement was approved in November 2024 by the ActewAGL Joint Venture Board.



**Carol Lilley**  
Chair  
ActewAGL



**John Knox**  
Chief Executive Officer  
ActewAGL



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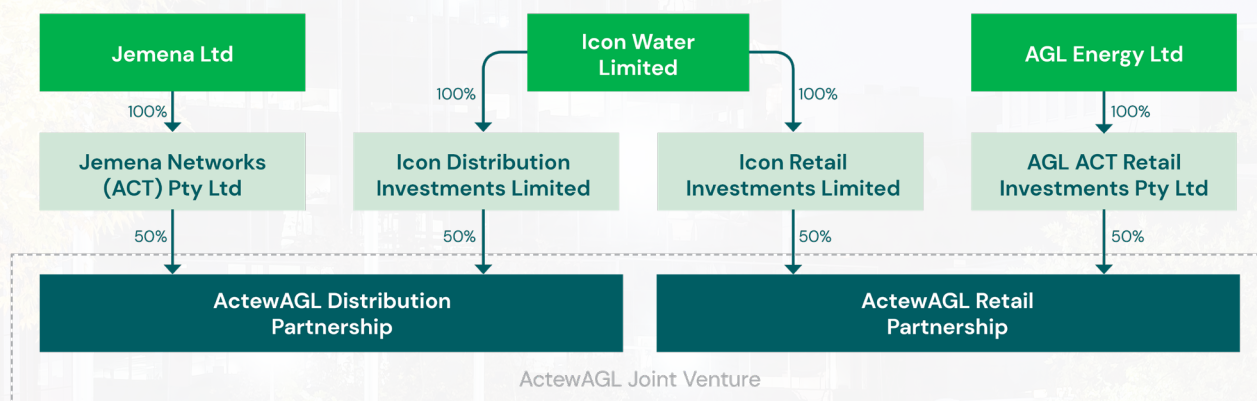
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## 1 Identifying the reporting entity

### ABOUT ACTEWAGL

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

- ActewAGL Retail (ABN 46 221 314 841) is owned 50 percent each by Icon Water Limited and AGL Energy Ltd via subsidiary companies.
- ActewAGL Distribution (ABN 76 670 568 688) is owned 50 percent each by Icon Water Limited and Jemena Ltd via subsidiary companies.



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

## 2 Structure, Operations & Supply Chain

### OUR STRUCTURE AND OPERATIONS

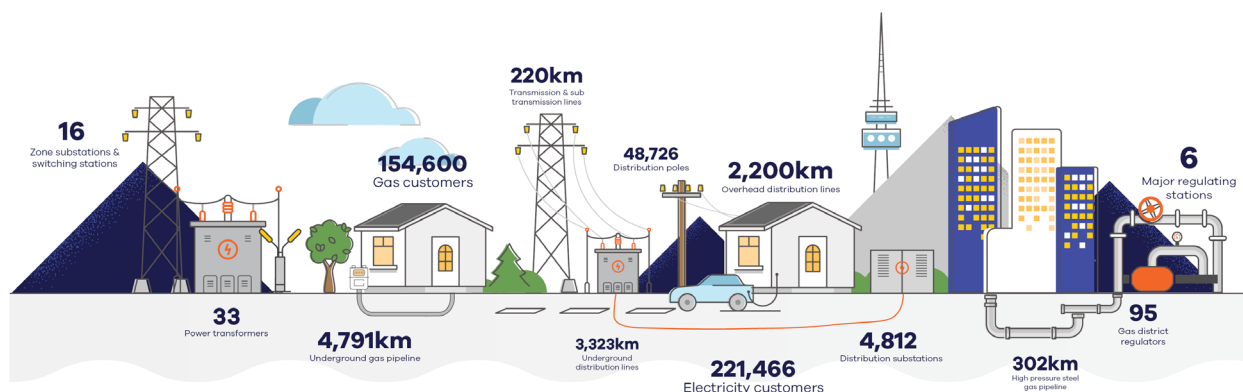
The ActewAGL Joint Venture consists of three main businesses being Evoenergy, ActewAGL Retail and ActewAGL Corporate that includes finance, people, legal, technology and economic regulation.

#### Evoenergy

Evoenergy is part of the ActewAGL Distribution partnership which owns and operates the electricity network in the ACT and gas networks in the ACT and surrounding regions, distributing energy to local residential and business customers. As the ACT's electricity and gas distributor we have a wealth of knowledge and experience in electricity and gas network infrastructure. In total, we own and operate 5,500 kilometres of electricity network supplying over 200,000 electricity customers and around 5,000 kilometres of gas mains supplying over 150,000 gas customers.

Evoenergy is a major employer in the Canberra region, we employ over 300 local electricians, engineers, and specialists to operate and manage our energy networks. On the gas side of our business, we work with our contractor Zinfra, to maintain our gas infrastructure across the ACT, Queanbeyan, Jerrabomberra, Bungendore and Nowra.

We're excited about the future of the energy sector in the ACT and we're looking forward to working with the ACT Government, industry, stakeholders and the community to achieve net zero greenhouse gas emissions in the energy sector through electrification. We recognise this journey will require changes to our networks, ensuring we meet customers' changing energy needs and expectations with the impacts to affordability, reliability and safety in mind.



## ActewAGL Retail

ActewAGL Retail is a local electricity and gas retailer, providing energy to the Canberra region and nearby centres in the south-east NSW region including Queanbeyan, Goulburn, Nowra and the South Coast.

As a major employer in the ACT, our complete operations are delivered from the heart of Canberra.

ActewAGL Retail has provided energy to the people of Canberra and the region for more than 100 years. We are a local energy retailer and we live in the community we serve. This gives us a unique ability to stay connected to our customers and community. Our history and position also means we have a responsibility to our community and this responsibility is something we take very seriously.

## OUR SUPPLY CHAIN

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

Risk assessments of our supply chain have been conducted to identify potential modern slavery risks.

The following were considered when undertaking this analysis:

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

To date, all ActewAGL vendors with an annual spend greater than \$100,000 have completed risk assessments using the Energy Procurement and Supply Associations' (EPSA) Modern Slavery Risk assessment tool. Further, all vendors undertake a risk assessment as part of the new supplier onboarding process irrespective of spend. Modern Slavery Risk Assessments are reviewed annually. The analysis found no high risk of modern slavery within our supply chain.

### Key facts on our supply chain:

ActewAGL's supply chain comprises more than 800 suppliers with an annual spend of \$850m. The majority of the spend (99%) was paid to Australian-based suppliers, noting some of these are subsidiaries of foreign owned entities.

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



## 3 Modern Slavery Risk

### OUR EMPLOYMENT PRACTICES

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

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

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

ActewAGL regularly reviews all policies and procedures, continually enhancing and incorporating new developments to ensure they reflect modern practices and emerging trends.

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

#### Employee Code of Conduct

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

#### People Policy

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

This policy outlines that ActewAGL:

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

## Whistleblower Procedure

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

A disclosure can be made by phoning **1800 233 285** or emailing [actewagl@deloittedigital.com](mailto:actewagl@deloittedigital.com)

## KEY SUPPLY CHAIN RISKS

The following table outlines key risk categories in the Supply Chain:

Product or Service	Type of Risk
Cleaning, Maintenance and Security Services	Nature of sub-contract work limits visibility of contractors' practices (wages, working hours, on-demand work, manual labour)
Clothing and Personal Protective Equipment (PPE)	Lack of transparency in manufacturing and labour processes
Information Technology Services	Limited visibility of offshore labour practices
Electronic Goods	Limited visibility in offshore labour practices, low cost country sourcing, raw materials sourced from high-risk geographies
Equipment and materials	Visibility of labour practices and raw material sourcing

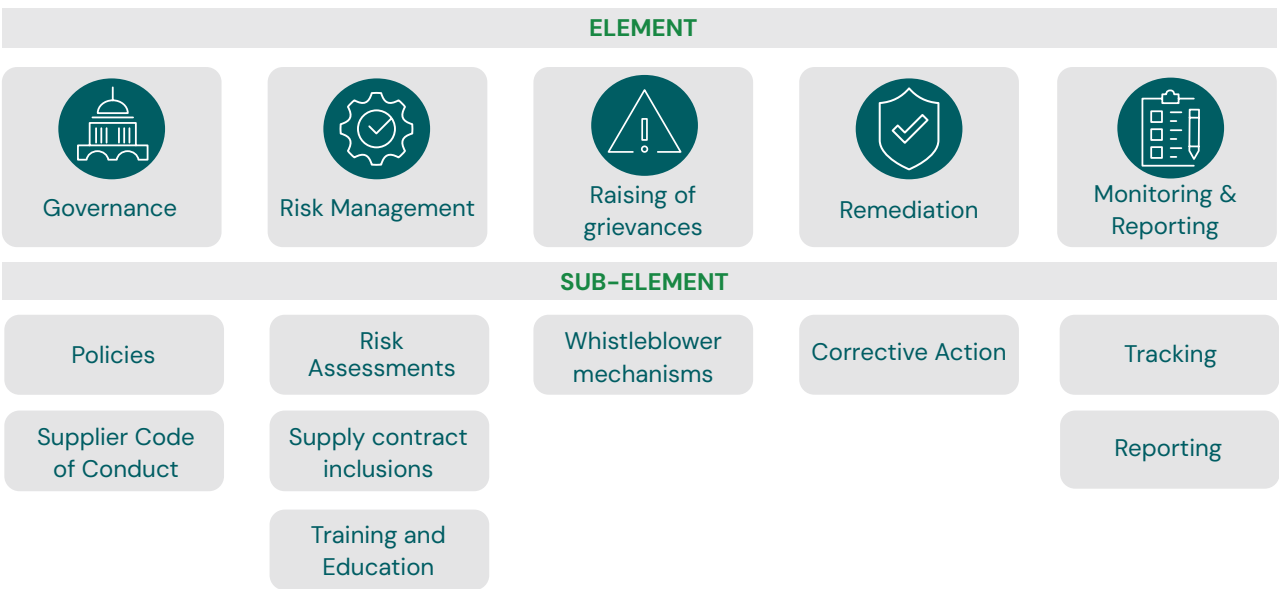
These risks are monitored and mitigated by the Modern Slavery Framework.



## 4 Assessing & addressing Modern Slavery including due diligence & remediation

### MANAGING MODERN SLAVERY RISKS

ActewAGL has introduced initiatives to reduce the likelihood of modern slavery occurring in our supply chain. We have established a framework and work practices that enable us to monitor and reduce modern slavery risk within our business and supply chains. This year, we continued to enhance these practices and further risk assess our supply chain.



### Our Modern Slavery Framework:

Elements of our Modern Slavery framework include:

#### Policies and Procedures:

- Corporate policies and procedures updated to address modern slavery, including our People Policy and Whistleblower procedures.

#### Training and Education:

- Modern slavery training provided to all employees. This training is mandatory and is refreshed biennial. It is also incorporated as part of the new employee induction process.
- The training provides a clear understanding of what modern slavery is and what to do if concerns are identified.

#### Supply Contracts:

- Inclusion of anti-slavery clauses in all new or varied Supplier Contracts. This includes ActewAGL direct labour hire arrangements.

## Supplier Code of Conduct:

- Supplier Code of Conduct developed and agreed by new and existing suppliers of ActewAGL. Through this code, ActewAGL reserves the right to verify supplier's compliance with the Code. If it is found that a supplier does not comply, ActewAGL reserves the right to demand corrective measures or to terminate the business relationship.

## Modern Slavery Risk Assessment:

- A Risk Assessment tool was developed in collaboration with members of the Energy Procurement and Supply Association (EPSA). This ensures a consistent industry approach to assessment and best practice through collective development and enhancement.
- The Modern Slavery Risk Assessment tool is revised annually to reflect changes to Country and Industry risks as published by Bureau Veritas. The nature of modern slavery is dynamic, influenced by a multitude of factors. Bureau Veritas's methodology considers broader societal, political, and environmental aspects, offering a holistic view of risks such as:
  - Geopolitical Shifts: Changes in government policies or political stability can significantly impact industry operations and regulatory environments.
  - Economic Fluctuations: Variations in the economic landscape, such as recessions or economic booms, can affect labour markets and financial stability, altering risk assessments.
  - Environmental Changes: Issues like climate extremes, flooding, and other environmental challenges can impact operations and worker safety, necessitating updates in risk evaluations.
- Suppliers internal policies are also considered as part of the assessment.
- Where a Risk Assessment identifies improvement opportunities, these are communicated to the supplier for action.

## Actions taken to assess & address risks:

### Risk Assessment:

- All suppliers with an annual spend greater than \$100,000 have completed a Modern Slavery Risk Assessment.
- All prospective suppliers to ActewAGL must complete a Modern Slavery Risk assessment prior to being on-boarded.
- Assessments are reviewed annually or validated to ensure a complying Modern Slavery Statement.
- Where improvement opportunities are identified, these are communicated to the supplier for action.

### Process Enhancement:

- Risk Assessments are part of the mandatory evaluation criteria in the ActewAGL Request for Proposal process.
- Modern Slavery Risk Assessments and agreement to the Supplier Code of Conduct are mandatory requirements for supplying to ActewAGL and are incorporated into the onboarding of new vendors.



## Training and Education:

- New employees undertook Modern Slavery and Whistleblower training, as well as Bullying and Harassment training as part of their induction program.
- Existing employees also undertake refresher training in Modern Slavery, Whistleblower as well as Bullying and Harassment biennially.

## Contractual Engagement:

- All new or varied supply contracts include clauses specific to Modern Slavery.

## Supplier Payment Times Reporting:

- Consolidated systems and processes to effectively identify small businesses within the supply chain and report on payment times as part of our commitment to good practice in procuring goods and services. This helps small business enhance their cash liquidity, ability to operate, pay employees and invest in their business.
- Our payment performance is reported to the Payment Times Reporting Scheme.

## Remediation:

- All new or varied Supply contracts include Modern Slavery remediation and termination clauses
- Should any examples of modern slavery be identified or reported, our priority is to support those in need by working to remediate the issue or terminate supply.
- As a preventative measure, Risk Assessments are now incorporated as part of the new supplier on-boarding process while also included in our Request for Proposal evaluation processes.

## Due Diligence:

- In collaboration with the Energy Procurement and Supply Association (EPSA) and Informed 365, risk assessments of major suppliers were conducted requiring vendors to provide details of their:
  - Workforce composition
  - Supply chain
  - Business controls
  - Procurement processes
  - Employment processes
  - Whistle-blower program
- To date over 500 ActewAGL vendors have completed modern slavery risk assessments using the Energy Procurement and Supply Associations' (EPSA) and Informed 365 Modern Slavery Risk assessment tool.

## Case Study 1 – Risk Identified:

In 2022 our Modern Slavery processes flagged a potential risk in relation to some imported Personal Protective Equipment (PPE) items produced within Tier 3 of the supply chain. We acted swiftly with our vendors to source alternate products ensuring ongoing protection and safety of staff. The Tier 2 vendor responsible for engaging the end producer is no longer approved for supply to ActewAGL.

## Case Study 2 – Reducing potential risk through supplier due diligence and risk assessments:

In the past 12 months, ActewAGL revised or undertook more than 250 Modern Slavery risk assessments. The purpose of refreshing Modern Slavery risk assessments regularly ensures the ever-changing country and industry sector risks are monitored.

Suppliers across all categories of spend are reviewed. ActewAGL is committed to continuing to work with our supplier network to engage, identify, assess and mitigate risks posed within the supply-chain

Risk-based reports and improvement recommendations, along with Corrective Action plans have been issued to vendors as required prior to new suppliers being approved for onboarding.

The review process successfully identified the example outlined above in Case Study 1.

## 5 Assessing effectiveness

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



**Modern Slavery education and collaboration**



**Continuously review and improve**



**Take action**



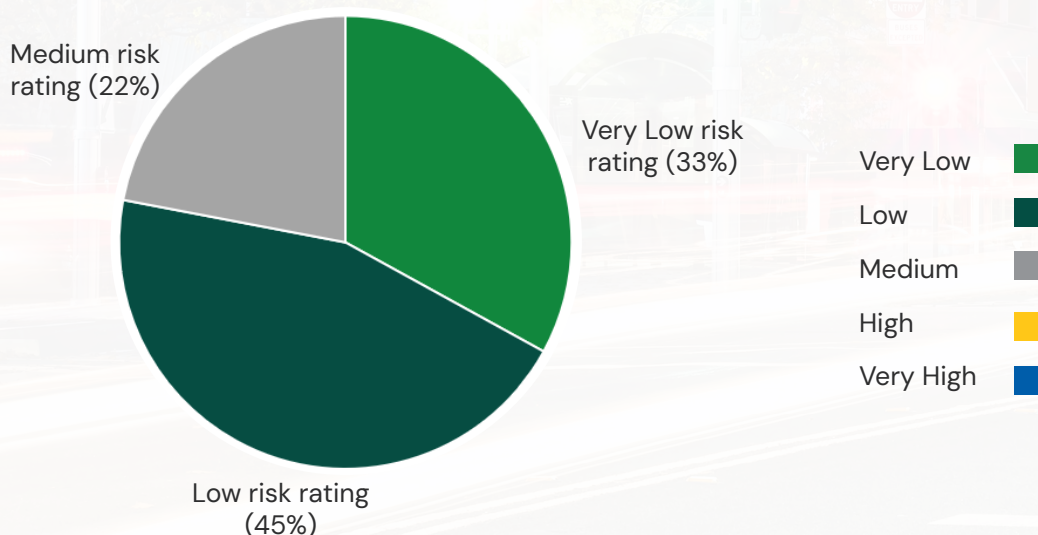
**Report**

It is important to reflect on the work that has been done and regularly review our progress. We demonstrate the effectiveness of our actions by:

- A regular education program
- Procurement representatives interacting across the business and externally with industry peers to enable regular engagement and feedback between key areas
- Continually reviewing and improving our approach and response to modern slavery risks ensuring we add from our learning and experience
- Tracking the actions taken to address modern slavery risks and measuring their impact
- Providing updates to members of our Board through the Safety, Audit and Risk Committee.

### Modern Slavery Risk Rating

Of 500 vendors assessed, none received a risk rating of high or very high.



## 6 Consultation and Collaboration

### CONSULTATION WITH OTHER ENTITIES

We consult with representatives across the ActewAGL Joint Venture, collaborating on our approach to the analysis of our risk profiles and undertake risk assessments of large suppliers to identify our modern slavery risks.

We work together to review employment conditions that focus on the rights and wellbeing of our employees, including the labour standards articulated through our respective enterprise agreements.

We standardise our practices to include modern slavery in the evaluation of market proposals, and specific obligations on our contracted suppliers, to ensure a consistent message to our supply chains.

### INDUSTRY COLLABORATION

#### Energy Procurement and Supply Association (EPSA)

We collaborate with our industry peers through the Energy Procurement and Supply Association to facilitate a joint industry approach to assessing our supply chains. This leads to a best practice approach to supply chain risk management and creates an alignment of values to which vendors must adhere.

The work carried out by EPSA has enhanced the energy industry Informed 365 Modern Slavery risk assessment platform and developed reporting functionality and dashboarding of supplier risk summaries together with industry standardisation of risk ratings and definitions.

The risk assessment tool is revised annually to incorporate recent findings as published by Bureau Veritas.

### INFORMING THE COMMUNITY

Through our corporate website we publicly detail the standards of conduct and principles our staff are required to uphold. These set out the minimum requirements we expect in areas such as workplace policies and practices, health and safety, human rights, environmental protection and business integrity. We also encourage suppliers within our supply chain to embrace similar values by adhering to our Supplier Code of Conduct.

Our Modern Slavery Commitment is also promoted through the ActewAGL Joint Venture website together with Whistle-blower details.



## 7 Plans for future action

### TAKING ACTION

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

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

### OUR FUTURE COMMITMENT

ActewAGL recognises that eliminating modern slavery within our business and supply chain requires an ongoing commitment. Identifying and addressing modern slavery risks in our operations and supply chains requires sustained effort through continuous improvement. We expect our approach to continually evolve as we refine our processes and build capability within our business.

#### We will:

- continue our education program and providing biennial refresher training to all employees.
- continue to work through our vendor base by undertaking risk assessments of new or growing suppliers.
- continue to incorporate modern slavery clauses in all new or varied contracts.
- continue our collaboration with the Energy Procurement and Supply Association.
- undertake annual review of those supplier Risk assessments.
- enhance our remediation processes as a result of any poor experiences.
- continue to ensure modern slavery risk assessments and Supplier Code of Conducts are completed when onboarding new suppliers.

***ActewAGL***

**Joint  
Venture**