

Modern Slavery Statement

Statement for 2021



Contents

Foreword	3
1 About us	4
2 Structure, operations and supply chains	8
3 Modern slavery risks in our operations and supply chain	14
4 Our approach to assessing and addressing modern slavery	18
5 Measuring our effectiveness	22
6 Consultation	23
7 Next steps	24

Disclaimer

This report has been prepared for the sole purpose of the Modern Slavery Act 2018 (Cth).

Whilst care was taken in the preparation of the information in this document, and it is provided in good faith, SA Power Networks accepts no responsibility or liability for any loss or damage that may be incurred by any person acting in reliance on this information or assumptions drawn from it.

SA Power Networks advises that anyone proposing to use the information in this document should verify its reliability, accuracy and completeness before committing to any course of action. SA Power Networks makes no warranties or representations as to the document's reliability, accuracy and completeness and SA Power Networks specifically disclaims any liability or responsibility for any errors or omissions.

Foreword

Chairman's Statement



2021 has continued to be a year of uncertainty for South Australians as the effect of the COVID-19 pandemic caused ongoing disruption. As an essential service provider, SA Power Networks is committed to providing ongoing community support and customer service throughout the various state lockdowns, as well as providing a safe environment for our workforce. We are committed to applying the same human-centred approach we bring to our workforce, customers and community to our broader operations and supply chain. The Board of SA Power Networks will continue to support efforts to help eliminate modern slavery and collaborate within our industry group to identify and address areas of risk.

Since our first statement last year we have refreshed our industry risk management platform Informed 365, begun issuing Supplier Assessment Questionnaires (SAQs) to our higher risk suppliers, provided upskilling and training on modern slavery to our entire Procurement team and have anti-modern slavery contract clauses in approximately 75% of our

active supplier contracts. While we are proud of these achievements, we acknowledge that there are still many improvements to be made. Our focus for the future is to embed a standardised operating procedure for modern slavery management to address end-to-end modern slavery risk with our suppliers, including tendering, onboarding, contract management and governance. We are also committed to improving our modern slavery reporting and transparency and will be focused on creating clear KPI's to track our progress.

We are committed to improving our performance and leveraging our industry relationships via the Energy Procurement and Supply Association (EPSA) to address the human rights impacts within our industry.



Peter Tulloch, Chairman

This statement was approved by the SA Power Networks and Enerven Boards on 08/03/2022.

CEO's Statement



SA Power Networks is proud to be rated Australia's most productive electricity distributor, and we are excited by the change and innovation required to ensure we transition South Australia's electricity grid to integrate renewable energy sources.

This Statement outlines our steps to combat the risks of modern slavery in our operations and supply chains.

SA Power Networks' vision is to 'lead the transformation of energy services for a sustainable future'. Our commitment to a sustainable future extends beyond our immediate workforce, customers and the communities we serve. We are also committed to doing what's right to minimise the likelihood that our sourcing and procurement of goods and services throughout our supply chain isn't marred by modern slavery.

In this second year of reporting, we have extended and deepened supplier engagement and assessment, further integrated how we minimise the risks of modern slavery into our business processes and continued to work with industry peers on joint initiatives.

Looking ahead, we will focus on continuous improvement in mitigating the risks of modern slavery across our operations and supply chain, as we deliver on our company purpose.



Rob Stobbe, CEO

1 About us

Identification of the reporting entity

This statement has been prepared and published in accordance with the Modern Slavery Act 2018 (Cth) (The Act) for the calendar year ended 31 December 2021 (CY21). It covers the activities of the reporting entity SA Power Networks (ABN 13 332 330 749) and entities owned and controlled by SA Power Networks:

- Utilities Management Pty Ltd (ABN 25 090 664 878)
- Enerven Energy Infrastructure Pty Ltd (ABN 31 621 124 909)
- Enerven Energy Solutions Pty Ltd (ABN 49 621 147 297)
- ETSA Utilities Finance Pty Ltd (ABN 78 091 701 825)
- ETSA FRC Pty Ltd (ABN 85 101 536 412)
- ETSA Ancillary Pty Ltd (ABN 87 101 536 421).

All references to our, we and us within this statement refer to SA Power Networks and the entities it controls.



Who we are



SA Power Networks

SA Power Networks is the licensed Distribution Network Service Provider (DNSP) for South Australia. We perform the essential role of planning, building, operating and maintaining the South Australian electricity distribution network and ensuring that it continues to be able to meet the needs of South Australians. Our goal is to provide electricity distribution in a safe, reliable, efficient and prudent manner.

We are responsible for supplying electricity to 1.7 million South Australians, incorporating 900,000 homes and businesses across a geographical area of 178,000 sq km. Our role is to manage the network in a way that ensures safe and reliable delivery of electricity to all customers. Our responsibilities include:

- Maintaining the network to ensure safe, reliable supply
- Restoring power if there is an outage
- Connecting power for new customers
- Upgrading the network to meet changing demand due to localised growth
- Shaping the network for the future to ensure it's able to support the needs of customers who are changing the way they source and use energy
- Maintaining street lights on behalf of councils and government
- Meter data reading and maintenance of meters not owned or managed by retailers.



Enerven

Enerven is a wholly-owned subsidiary of SA Power Networks Group. Enerven is focused on providing innovative solutions to our customers' energy requirements such as servicing new government and business customers with integrated renewable energy solutions across a range of terrains and geographies.

We are entering an era of significant change within the energy sector, with South Australia leading the charge as one of the most decentralised electricity systems in the world. Our distribution network will need to adapt to align with the South Australian target of reaching net-100% renewable generation in the grid. We aim to accelerate our efforts to adapt to a dramatically different network structure to accommodate the anticipated rise in household solar and electric vehicles. The key services that Enerven provides include:

- Substation and transmission network construction and maintenance
- Embedded Networks and private electricity network construction and management
- Electrical and Technical services, including metering
- National Association of Testing Authorities (NATA) accredited calibration laboratory
- Material sales and supply chain management
- Engineering services, including LiDAR and drone services
- Lighting solutions, including public and private lighting construction, including smart lighting
- Renewable energy project construction, integration, and maintenance, such as solar PV and Battery Storage
- Communication network solutions, including 5G.

About us

Our progress to date

Last year our focus was implementing the foundations of our risk assessment and mitigation framework to begin to understand our modern slavery impact. In 2021, we focused on further developing the structures to support supplier compliance with our modern slavery policies and contractual clauses, maintaining certification standards and establishing our modern slavery due diligence process. Following our progress last year, we have undertaken the following actions:



Our plan for the future

Having integrated the Informed 365 risk assessment framework, which we plan to refresh annually, our future focus is enhancing procedures in response to the insights from the risk assessment framework. This will include the following actions, categorised as short, medium and long-term goals.

Short term (within 2022)



Implement standardised modern slavery and human rights due diligence procedures across the business to ensure that clear procedures and accountability are part of SA Power Networks and Enerven’s modern slavery risk management framework.



Develop a process for responding to sudden human rights risks including a business-wide approach to remediation. An example includes our response to growing concern within the solar industry.



Improve modern slavery awareness by making our internal education programs available to more of our team members.

Medium term (within 2–3 years)



Explore further options for grievance and remediation pathways available for our key suppliers, providing them with the opportunity to report on instances of modern slavery.



Define standardised modern slavery management standard operating procedures (SOPs) that address end-to-end risk assessment, risk management and supplier engagement.



Introduce modern slavery KPI targets, quantitative metrics and indicators for assessing the effectiveness of our modern slavery framework and due diligence approach to enable regular monitoring and reporting to the Executive Leadership Team.

Short to medium term



Drive a greater supplier response rate to the Informed 365 digital SAQ assessment program for suppliers in highest risk industries.



Increase supplier engagement to focus on gaining transparency over highest risk tier 2 and tier 3 supply chains.



Supplier engagement through sharing our experiences and working with EPSCA members to explore development of initiatives to improve supplier compliance to the Act.



Due diligence deep dives in our supply chains, leveraging insights from supplier self-assessment questionnaires to assess our suppliers’ policies, procedures and education programs.

Long term (3–4 years and beyond)



Explore options for a responsible procurement multi-stakeholder initiative via partnership with a 3rd party audit provider.

2 Structure, operations and supply chains

Structure

SA Power Networks is a partnership which is 51% owned by Cheung Kong Infrastructure Holdings Limited and Power Assets Holdings Limited, which form part of the Cheung Kong group of companies based in Hong Kong. The remaining 49% of the partnership is owned by Spark Infrastructure group.

Up until 22 December 2021, the Spark Infrastructure Group was a publicly listed infrastructure fund trading on the Australian Stock Exchange (ASX: SKI). On 22 December 2021, a private company, Pika Bidco Pty Ltd (ACN 652 787 258) (“Pika Bidco”), acquired 100% of the issued securities in the Spark Infrastructure Group.

Pika Bidco is indirectly owned by funds and/or investment vehicles managed and/or advised by:

- Kohlberg Kravis Roberts & Co. L.P. and/or its affiliates
- Ontario Teachers’ Pension Plan Board and
- Public Sector Pension Investment Board.

While the acquisition by Pika Bidco did not cause a change to the direct shareholding of Spark Infrastructure SA (No. 1) Pty Ltd, Spark Infrastructure SA (No. 2) Pty Ltd or Spark Infrastructure SA (No. 3) Pty Ltd, it did result in a change to the upstream ownership of these entities. Pika Bidco now indirectly owns the remaining 49% of the partnership which owns SA Power Networks.

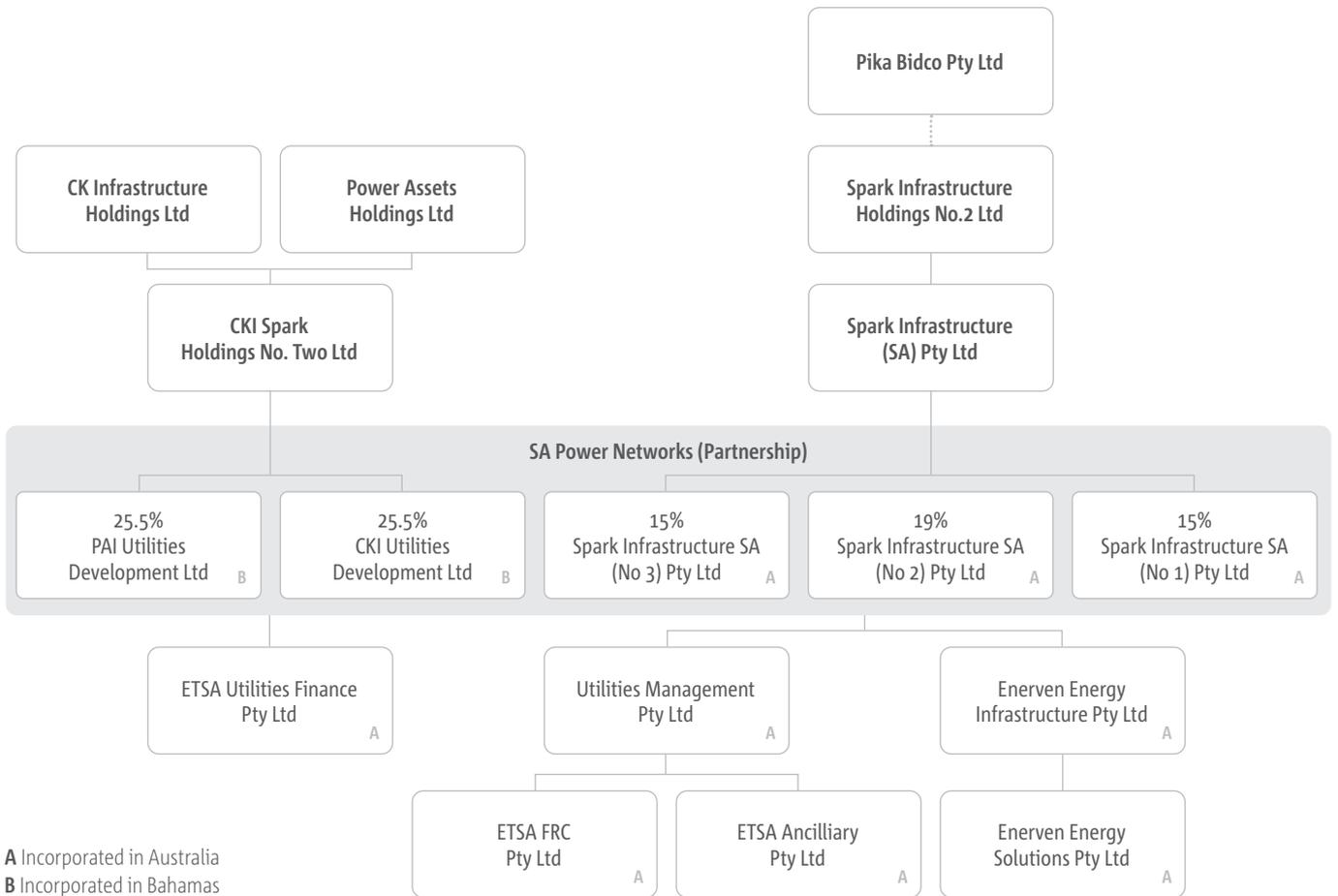
As outlined in the organisational and ownership structure below, SA Power Networks Group owns several entities – all of which are covered by this statement.

- Enerven designs, develops, delivers, and manages safe and sustainable power systems and multi-utility networks for owners of major infrastructure.
- SA Power Networks Group employees hold formal contracts with Utilities Management and are utilised by both SA Power Networks and Enerven.
- The ETSA entities are holding entities without active business operations or supply chains and so exposure to modern slavery risks are limited in scope.

SA Power Networks currently employs approximately 2,200 employees directly and Enerven employs roughly 420. The majority of our workforce across both SA Power Networks and Enerven (approximately 90%) are employed directly with supplementary labour (casual) engaged to support. The breakdown of supplementary labour is discussed further below.

Our Board of Directors oversees our strategic direction and performance and provides support to the Executive Leadership Team. Modern slavery compliance is currently reported periodically to the Risk Management and Compliance Committee who incorporate the findings into a report for the Board. The following committees have also been established to assist with the responsibilities of the Board:

- **Audit Committee** – assists with financial reporting, maintaining an efficient system of internal control and promoting an ethical culture.
- **Risk Management and Compliance Committee** – responsible for reviewing the risk profile of the business and oversight of risk management process, while ensuring appropriate procedures are in place to comply with legal obligations.
- **Remuneration Committee** – reviews and makes recommendations on remuneration arrangements for managers and staff.



Structure, operations and supply chains

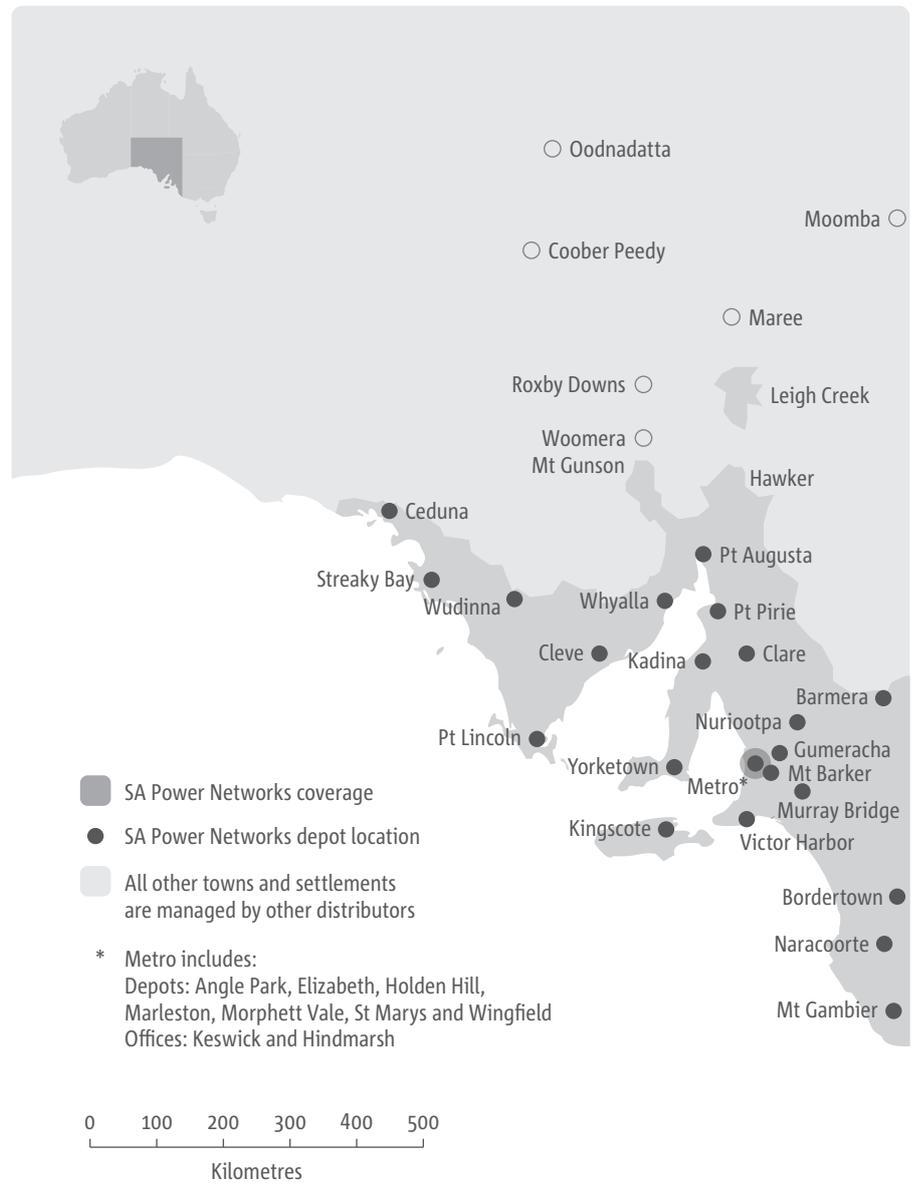
Operations

SA Power Networks operates the low-voltage distribution network throughout South Australia including powerlines, poles, meters, wires and substations.

The electricity distribution network in South Australia covers roughly 178,000 sq km, with a network route length of 89,000km. We supply electricity to approximately 900,000 customers ranging from regional and metropolitan residential homes and businesses to industry precincts and isolated farms in rural areas.

SA Power Networks provides the following services as part of its electrical infrastructure operations:

- Delivery of electricity to residential and commercial users
- Providing emergency response services in case of blackouts
- Repairing street lighting
- Meter reading
- Project management and construction and maintenance services for electrical infrastructure projects
- Research and development activities for emerging energy products and services.



Operationally, SA Power Networks operates across nine departments and Enerven operates as its own business entity (supported by Shared Services functions).



100 **50**
FTE Casual
67% 33%

Customer & Community

Our Customer & Community team are responsible for the delivery of reliable and safe power supply for our residential and business customers. The casuals that are included within this business function are typically employed to administrate our call centre and billing to customers.



1000 **50**
FTE Casual
95% 5%

Field Services

Our Field Services team is responsible for providing infrastructure services to the distribution network including operations, the delivery of capital projects and network upgrades, maintenance and supply restoration. The casuals that are included within this business function are typically employed to support operational activity and administration support and scheduling of operational work.



70 **5**
FTE Casual
93% 7%

Finance Services

Our Finance Services team is responsible for the management of our investment, financing and costing decision making.



30 **0**
FTE Casual
100% 0%

Governance & Regulation

Our Governance & Regulation team is responsible for risk management, regulatory compliance and provide broad consultative advice across the business at SA Power Networks.



120 **5**
FTE Casual
96% 4%

Innovation & Technology

Our Innovation & Technology team is responsible for all aspects of Information Technology and driving a culture of Innovation across the organisation.



340 **40**
FTE Casual
89% 11%

Network Management

Our Network Management team is responsible for network engineering, network control and asset management for the South Australian electricity distribution network. This includes our implementation of our Future Network Strategy including new technologies such as renewable generation sources and new customer equipment such as in-home battery storage and electric vehicles. The casuals that are included within this business function are typically employed to support network engineering.



120 **10**
FTE Casual
92% 8%

People & Culture

Our People & Culture team provides support services to the business, including human relations, learning and development, occupational health and safety and environmental services.



45 **5**
FTE Casual
90% 10%

Strategy & Transformation

Our Strategy & Transformation team is responsible for the development of SA Power Networks' strategy to deal with the opportunities arising from customers' continued take-up of distributed energy resources, and the increasing challenges and risks posed by South Australia's ageing network infrastructure.



420 **25**
FTE Casual
94% 6%

Enerven

Enerven provides electrical and telecommunication infrastructure across the National Market. This includes the design, development, delivery, and management of safe and sustainable power systems and multi-utility networks for owners of major infrastructure. The casuals that are included within this business function are typically employed to support operational activity and administration support of operational work.



2245 **190**
FTE Casual
92% 8%

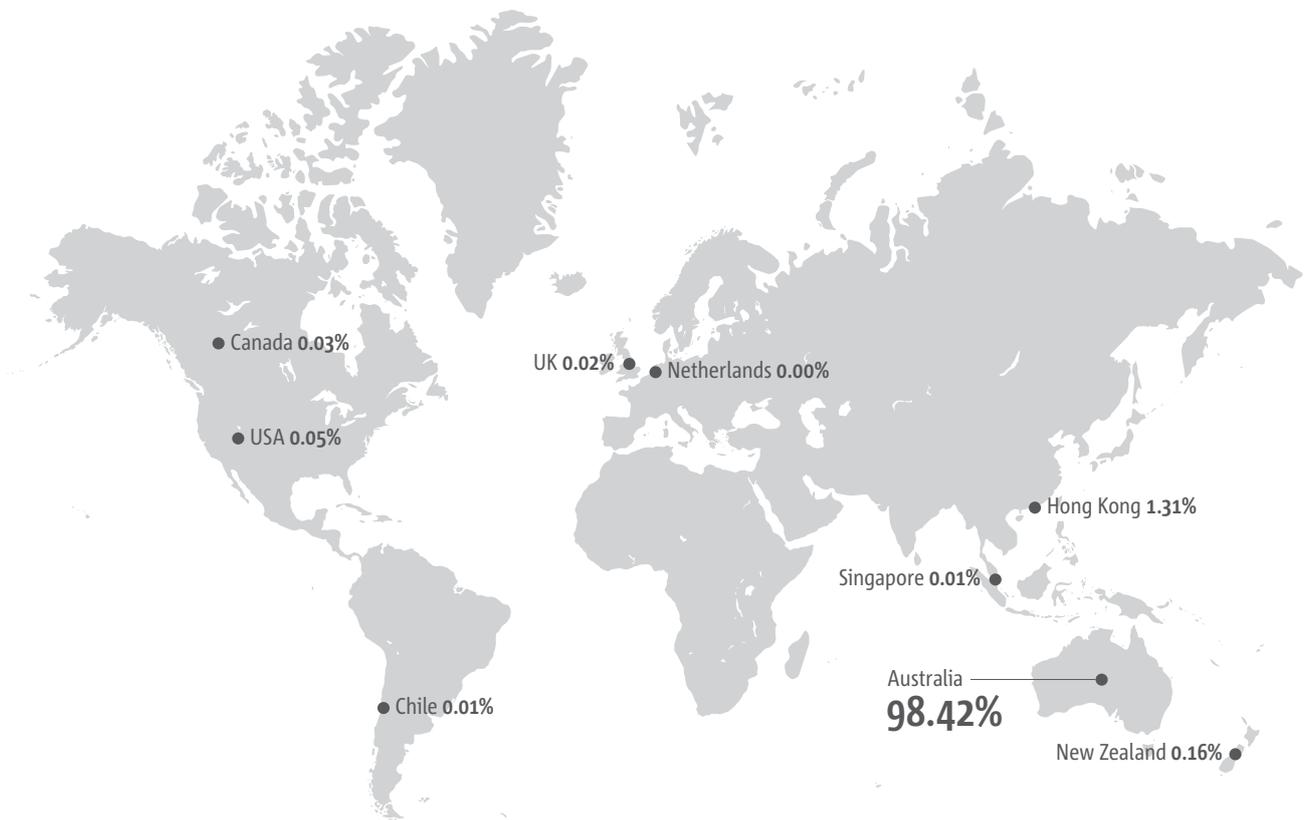
Total SA Power Networks Group



2 **0**
FTE Casual
100% 0%

SA Power Networks CEO (and EA)

FTE Full Time Employees (approx.)
Casual Casual Labour Full Time Employees (approx.)
% % Permanent and Casual Employees (approx.)



Supply chains

Consistent with our first statement, we strive to maintain long term ongoing supplier relationships to encourage a greater level of transparency. As at 31 December 2021, we have approximately 600 active formal contracts with just over 1,300 suppliers. The vast majority of our tier 1 supplier base is made up of Australian based domestic suppliers with over 98% of our expenditure in 2021 with Australian suppliers.

The results of our Informed 365 risk assessment tool confirm that none of our international suppliers are rated above a medium risk. In the instances that we do source products or services from overseas, the suppliers that we engage with directly typically operate within low risk industries. Alternatively, the country that we source from is rated as either low or very low, therefore reducing the risk inherent within the industry. In the future, we aim to gain further insight into our tier 2 and tier 3 supply chain for greater transparency and to be able to identify our exposure to risks deeper within the chain.

In 2021 our focus industries based on their heightened modern slavery risk and expenditure were:



Construction & engineering

Significant services include asset inspection, construction and maintenance, solar services and ICT



Energy & electrical equipment

Includes energy infrastructure materials such as power cables, transformers, line hardware, protective equipment, public lighting materials, solar panels, inverters, PV mounting equipment



Human resource & employment services

Includes the hiring and management of our casual workforce, such as facilities management, traffic management and professional services



Solar

Includes solar panels, batteries and inverters

Country	Industry	Informed 365 industry risk rating	Informed 365 country risk rating
Canada	Software	Low	Low
Chile	Research & consulting services	Low	Medium
Hong Kong	Software	Low	Medium
Netherlands	Diversified support services	High	Very low
New Zealand	Electrical components & equipment	High	Very low
Singapore	Human resource & employment services	High	Low
UK	IT services	Low	Low
USA	Diversified support services	High	Low



3 Modern slavery risks in our operations and supply chain

Informed 365 Modern Slavery Risk Index Summary

SA Power Networks has undertaken a modern slavery risk assessment using Informed 365 software in collaboration with peers through the Energy Procurement Supply Association (EPSA). Informed 365's modern slavery risk ratings calculation adheres with the United Nations Environment Programme guidelines for Social Life Cycle Assessment (LCA).

Each procurement category was screened for five social risk categories:

- Labour Rights & Decent Work
- Health & Safety
- Human Rights
- Governance
- Community Infrastructure.

The output of the Informed 365 risk assessment tool is a risk likelihood score that evaluates our suppliers as either low, medium, high or very high rating of risk likelihood based on their industry and geographic location.



Risk breakdown by spend

Our 2021 risk assessment was completed again in December 2021 and was conducted over 1,317 suppliers. Overall, none of our suppliers were assessed as having a risk greater than Medium. These results represent a decrease from last year's results over a similar number of suppliers. Given the high percentage of suppliers (98%) that are based in Australia, the variance in risk rating was mostly based on the industry risk that our suppliers operated in. Industries that were rated medium risk and accounted for a large amount of our annual spend included:

Industry	% of spend in 2021
Construction & engineering	24.43%
Electrical equipment	6.81%
Diversified support services	4.34%
Human resources & employment services	3%
Trucking	1.5%

Risk	Number of suppliers assessed	% of spend in 2021	Movement compared to 2020
High	0	0%	↓ 0.08% decrease
Medium	801	48.19%	↓ 7.31% decrease
Low	513	51.74%	↑ 7.41% increase
Very Low	3	0.07%	↑ 0.01% increase
Total	1317		

Survey response

In addition to providing an inherent risk assessment based on supplier industry and geography, the Informed 365 platform also sends and records supplier responses to an SAQ. The SAQ is intended to provide additional information on our supplier's governance and policy structure as well as their business and sourcing practices and provides a risk score based on their response. Given that the Informed 365 platform is operated on behalf of EPSA, supplier responses are shared among participating members. In future, we aim to create a standard operating procedure (SOP) whereby the results of the Informed 365 inherent risk assessment will prompt our procurement team to send and monitor the response from suppliers in industries of highest risk.

The Informed 365 risk assessment provides a supplier risk score based on an assessment of inherent country and industry risk. The SAQ assessment differs from the inherent risk assessment, in that the SAQ provides a supplier specific risk evaluation (low, medium, or moderate risk). These results are considered in tandem to assess the overall individual supplier risk based on the response to the SAQ. We have currently received questionnaire responses from 56 of our suppliers. We will continue to track and report on this metric as we continue to build our supply chain visibility over our supplier base.



Survey risk	Survey responses received	Movement
Low	56	24
Medium		4
Moderate		28

Industry risk

Based on the outcome of the Informed 365 risk assessment, our procurement team has interpreted the following industries to be of greatest risk of modern slavery. The procurement team has conducted research over these industries to understand the types of modern slavery risks that are present. The team aims to leverage the Informed 365 supplier SAQ to gain a further understanding of the governance structures and supply chain transparency to more effectively manage our risk exposure in these industries.

Construction & engineering

The Construction & Engineering sector in Australia has been linked to known cases of exploitation including human trafficking, deceptive recruitment practices, debt bondage and forced labour. The industry has a reliance on temporary migrant workers who are particularly vulnerable to deception in relation to work contracts, lack of compliance with employment standards and reduced capacity for redress in instances of threats or abuse. Additionally, the value chain for construction materials such as cement, textiles, rubber, timber, and iron are often traced back to countries such as China, Brazil, India and North Korea which all have significant risk of modern slavery practices.



Electrical equipment

The Informed 365 risk assessment tool considers the electrical equipment industry to be at high risk of modern slavery. This is based upon the long international supply chain for raw materials, as well as the reported instances of labour exploitation of migrant workers in the electronics manufacturing industry, particularly in China and Malaysia. All our electrical equipment suppliers are either based in Australia, the UK or New Zealand. As such the tier 1 supplier risk rating has been reduced to medium. An ongoing lack of supply chain transparency and limited leverage will restrict SA Power Networks' ability to address the modern slavery risks, however we will endeavour to collaborate with our suppliers to gain visibility over high risk products.



Human resource & employment services

Human resource and employment services are considered a high risk for modern slavery in Australia, but only in certain sectors, mostly due to exploitative labour hire arrangements. Highly vulnerable workers are common in labour hire arrangements in Australia, particularly migrant workers, and research indicates that despite recent regulatory efforts to address labour hire issues, they are still prevalent. Further, this has been exacerbated by COVID-19 as migrant workers with limited employment protection are more desperate for casual work, making them vulnerable to exploitation. SA Power Networks and Enerven only engages with Australian based HR & Employment services suppliers, and all our casual staff are covered under a single enterprise bargaining agreement. This agreement ensures that casuals are afforded consistent employment protections, such as pay parity.



Solar

A risk that has emerged in 2021 was the link between Uyghur forced labour in parts of China related to the production of raw materials such as polysilicon and the manufacturing of solar panels. Given reports that the Uyghur region accounts for approximately 45% of the world's solar-grade polysilicon supply, it is likely that most solar products will be impacted by modern slavery practices. This has prompted us to review our supplier relationships with providers of solar panels and equipment, and will be a focus area in 2022.



Modern slavery risks in our operations and supply chain

Geographic risk

As mentioned above, roughly 98% of SA Power Networks’ and Enerven’s suppliers are based in Australia, which has been ranked as having low risk of governance issues, a low percentage of inequality and disenfranchised groups and minimal effects as a result of conflicts. The only countries with a risk rating of Medium included Chile and Hong Kong. In both those countries the services that we procure (research and consulting services and software services) are considered low risk.

Country	% Spend in 2021	Informed 365 Risk rating
Australia	98.42%	Very Low
Canada	0.03%	Low
Chile	0.01%	Medium
Hong Kong	1.31%	Medium
Netherlands	0.00%	Very Low
New Zealand	0.16%	Very Low
Singapore	0.01%	Low
UK	0.02%	Low
USA	0.05%	Low

Case study: Solar supply chains

According to a report published in May last year titled *In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains* the solar module supply chain is heavily impacted by forced labour that occurs against the indigenous Uyghur and Kazakh citizens in China. Millions of Uyghur citizens have been placed into “surplus labour” and “labour transfer” programs, and there is significant evidence that these programmes amount to the forcible transfer of populations and enslavement. The report alleges that roughly 90 Chinese and international solar energy companies – including from the UK, Germany, the US and Australia – have supply chains that are linked to this forced labour. This highlights a very real need to gain a better picture of tier 2 and 3 supply chains, particularly in the solar industry to ensure that we continue to source products from companies that share SA Power Networks’ and Enerven’s commitment to uphold human rights.





TEM 18.340

SA Power Networks

MAN

SB57KR

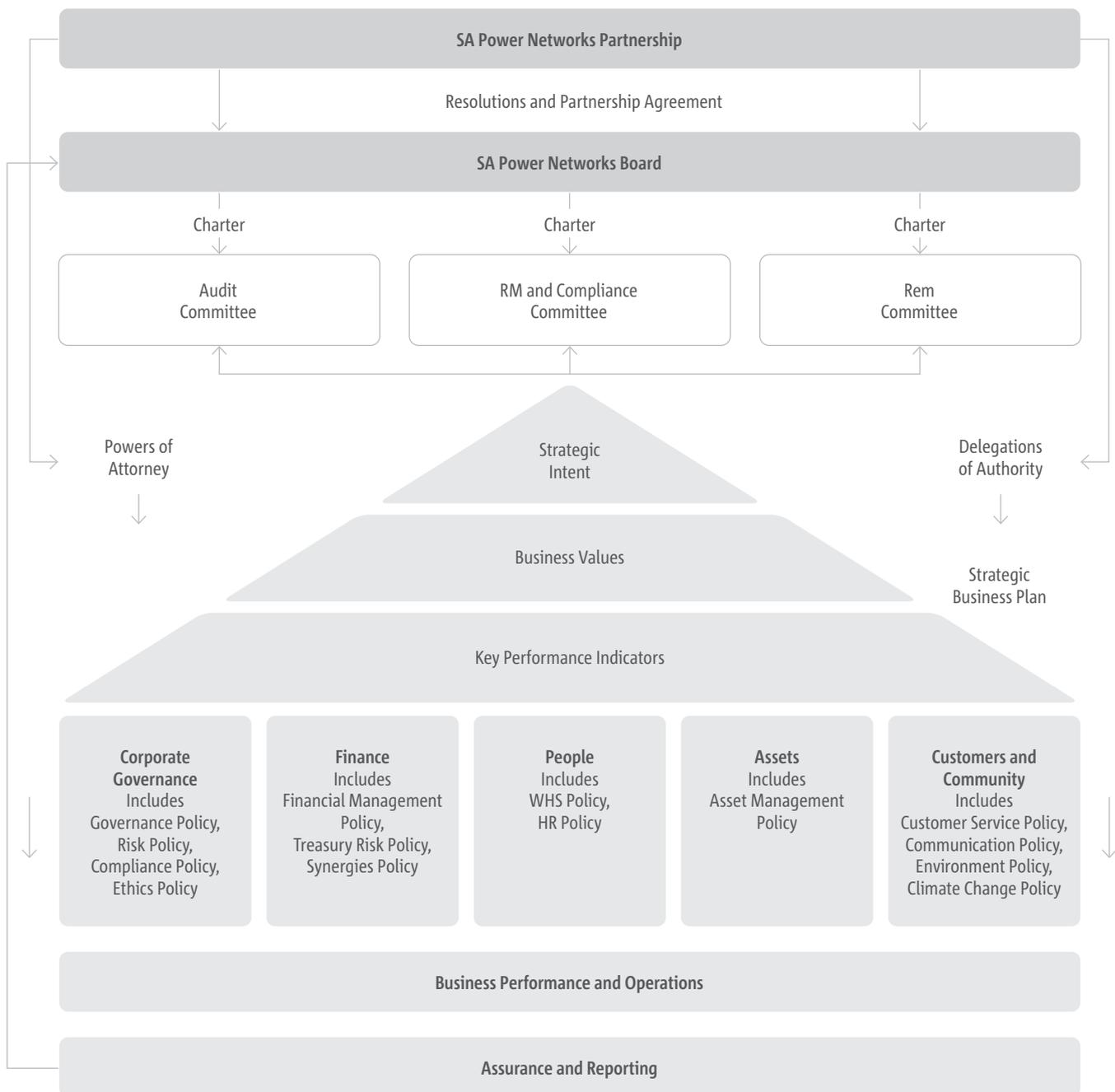
G M EQUIPMENT PTY LTD

4 Our approach to assessing and addressing modern slavery

Governance

Our company-wide governance framework acts to minimise against modern slavery risk in our operations and supply chain. Under our Board, sits our Risk Management and Compliance Committee, which has specific direction from the Board to consider modern slavery risks as they apply to our business and supply networks.

The Board are presented with a legal compliance report, prepared by the procurement team and the Risk Management and Compliance Committee twice a year, which includes a report on our compliance with the Modern Slavery Act 2018. This is expressed in writing through our policies (which are detailed in the Policies and procedures section below) around ethics and human rights and in our operational culture through a strong tone from the top.



Enterprise Risk management

SA Power Networks and Enerven utilise risk management principles in all aspects of the business and recognise that significant risk can arise from any of the organisation's functional groups and work streams, including strategic planning activities. Risk management is embedded in the risk identification, analysis, evaluation, treatment, monitoring and reporting activities of the business. We incorporated risks related to modern slavery into our risk management process in 2021.

SA Power Networks and Enerven utilise a suite of tools that deal with the assessment of risk in a consistent manner across many business functions. Matrices used for the assessment of consequence, likelihood, control effectiveness and management response have been developed for qualitative analysis in many areas, additional techniques are used for more complex assessments. For risk profiling sessions the scoring of risk and opportunity can be reported in a consistent manner by using the matrices developed for qualitative analysis.

Due diligence

SA Power Networks and Enerven are proud of our sustainable procurement practices and partner with like-minded suppliers who share the same commitment to:

- Comply with local, national and international environmental standards, laws and regulations
- Ensure transparency, confidentiality and fairness at all stages of the procurement process
- Declare any identified conflicts of interest that may arise
- Not engage in acts of bribery and corruption
- Support the development of local and small business
- Demonstrate corporate social responsibility by reviewing its supply chains including, modern slavery; and labour conditions, health and safety, diversity and inclusion and environmental impact.

We employ a Sourcing Framework (SF) and a Supplier Management Framework (SMF) as our due diligence mechanism in the source to contract and ongoing supplier management processes that provide both practical guidance and a core structure for those undertaking sourcing and supplier relationship activities for goods and/or services provided to SA Power Networks and Enerven. Within this guideline we provide detail over higher risk categories and our sustainable procurement tender response questionnaire. Supporting the SF are the Evaluation Guidelines which provide the following:

- Confirmation of the preferred evaluation process
- A consistent weighted criteria method for tender assessments
- Clear responsibilities of behaviours expected of SA Power Networks and Enerven representatives involved in the tender evaluation process
- Post evaluation activities

Additionally, we conduct an annual risk assessment over our supply chain using the newly implemented Informed 365 risk assessment framework. We aim to use the insights from this risk assessment to identify high risk geographies or high risk industries for modern slavery to direct our efforts for supplier management. By utilising the SAQ we gain insight into our supplier's sourcing practices and governance structure which will inform any remediation that needs to be performed. These insights are shared across the EPSA to allow for industry collaboration to address industry wide issues as they emerge.

Policies and procedures

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

- HR and Ethics Policy: sets out ethical expectations for all staff members and human relations within SA Power Networks and Enerven.
- Discrimination, Bullying and Harassment Guideline: provides guidance to SA Power Networks' and Enerven's employees and management regarding their responsibility to provide a workplace free from discrimination, bullying and harassment.
- Fair Treatment Guidelines: sets our guidance to ensure a work environment that allows all employees to work to their full potential and to promote a work environment which is free from unlawful discrimination, harassment and other unlawful acts.
- Equal Opportunity, Fair Treatment and Diversity Directive: provides direction to SA Power Networks' and Enerven's employees and management regarding equal opportunity, fair treatment and encouragement of diversity in employment at SA Power Networks and Enerven.
- Code of Conduct: provides expectations of employees regarding integrity, the fair treatment of others, safety, conflicts of interest, drugs and alcohol, corporate gifts, lawfulness, confidentiality, media comments, environmental sustainability and out of hours conduct.
- Contractor Compliance: is monitored through the insertion of a modern slavery clause in our contracts and in our compliance with a Chartered Institute of Procurement and Supply (CIPS) certifications (Ethical Procurement and Supply Certification and the Procurement Excellence Programme).

Grievance handling and remediation

SA Power Networks and Enerven employees act ethically in compliance with the Code of Conduct, as well as relevant State and Federal legislation. In instances where an employee notices a breach of the Code of Conduct they are encouraged to use our independent Whistleblower's Line to anonymously report any misconduct or unethical behaviour. The Whistleblower's line is operated by an external provider, which supports employees with assistance and anonymity. SA Power Networks and Enerven ensures that all individuals who disclose information about illegal or improper conduct occurring within SA Power Networks and Enerven will be protected in accordance with legal requirements.

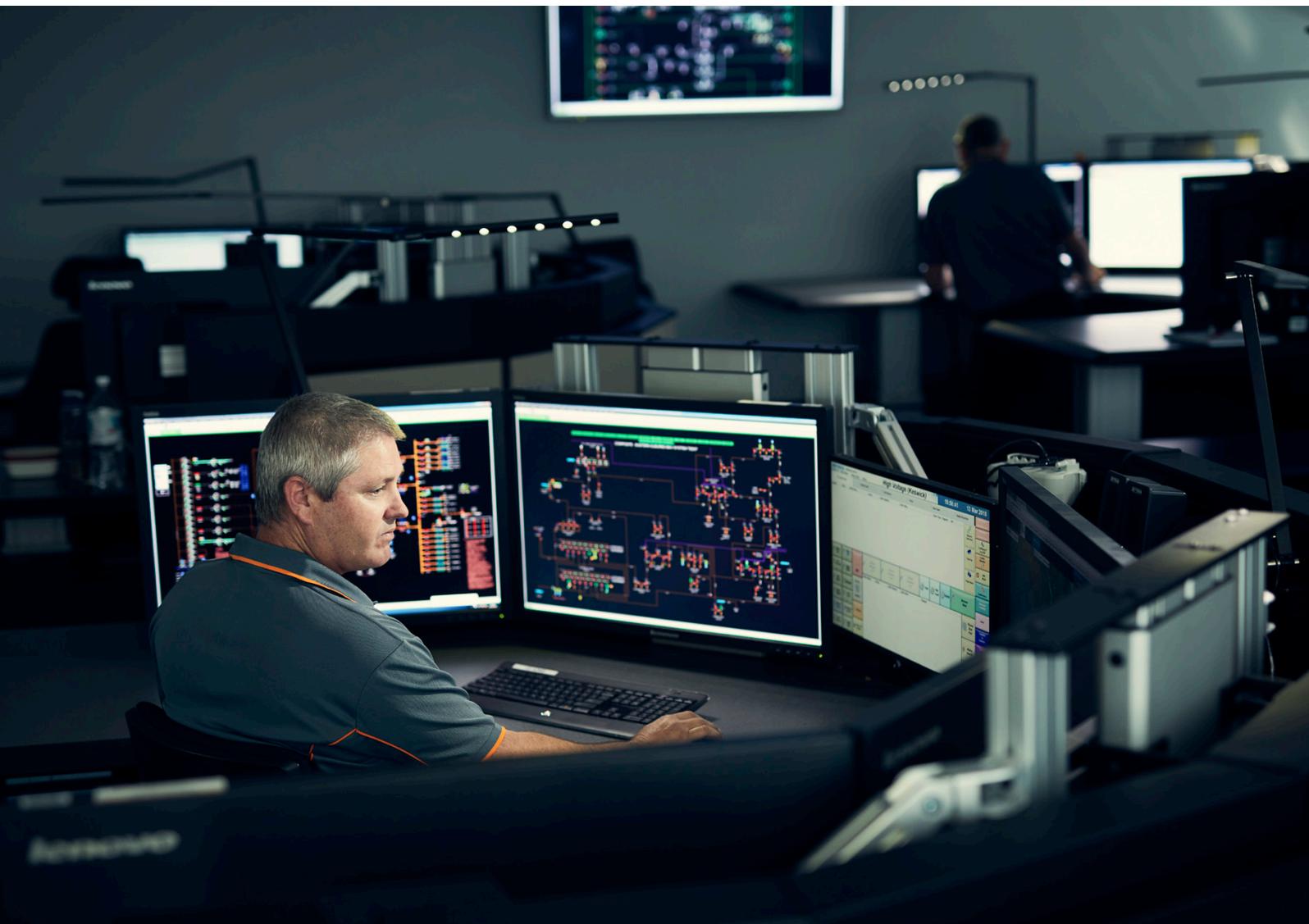
Our approach to assessing and addressing modern slavery

Training

In 2021 a modern slavery training module was created for awareness and to ensure our employees all play their part to achieve our objectives in addressing modern slavery risks in our business. Initially this training has been rolled out to the whole of our procurement function. Next year we will aim to broaden the scope of the training to include internal stakeholders that are likely to be relied on to identify, assess or remediate modern slavery exposure within SA Power Networks and Enerven.

Industry engagement

The Energy Procurement Supply Association (EPSA) is an Asia-Pacific not-for-profit association composed of energy industry procurement and supply professionals. We are continuing to engage with the EPSA to leverage industry collaboration to better identify modern slavery risks within our industry. In 2021 the EPSA members continued to implement the Informed 365 system, which acts as a single repository of our modern slavery-related data, in addition to provision of supplier modern slavery risk-rating capabilities. The tool also provides support for the remediation and reporting needs of participating organisations. There will be ongoing benefits for members and suppliers resulting from standardised industry SAQ requests, and work continues on developing the digital tool functionality.





5 Measuring our effectiveness

Review of performance against last year's commitments

Our goal in 2021 was to build our capacity to measure and evaluate the effectiveness of our actions to address the risks posed by modern slavery. As such we have gotten underway with our modern slavery risk management framework and due diligence processes led by our supplier risk assessment, supplier self assessment questionnaire and procurement contract clauses. We are committed to enhancing our modern slavery risk management framework, and acknowledge that there are still areas of improvement for us to focus on in the coming years. We have built upon our commitments for 2022 and will continue to review and report against our performance against those commitments.

Commitment	Status as at 2021	Remarks
Undertake external modern slavery training once every 3 years to stay abreast of requirements, best practice and areas for improvement	Ongoing	External training was completed in 2020
Maintain CIPS Standard and Ethical Procurement certification	Completed	Certification has been achieved for a 5th year
Conduct an annual modern slavery risk assessment of our operations and supply chains	Completed	Informed 365 inherent risk assessment completed
Develop a process for regular monitoring of human rights risks including actions when found including a company-wide approach to remediation	In Progress	Monitoring subscriptions have been purchased
Facilitate company-wide e-learning modern slavery awareness training on an annual basis	In Progress	Completed for the procurement team and to be rolled out broader in 2022
Continuation of adding the Anti-Slavery contract cause to our existing formal contracts	In Progress	Approximately 75% of supplier contracts include modern slavery clauses
Standardise modern slavery and human rights due diligence procedures across the business	In Progress	
Scoping exercise to consider an external third-party review of high-risk suppliers, with a focus on supplier compliance	Not started	

Responding to COVID-19

To date, the pandemic has had minimal impact on our ability to implement our Modern Slavery Program, however we are aware of the additional strain that it places on groups that are already vulnerable to exploitation.

As a business, we are well-versed in emergency response and have robust business continuity plans in place. COVID-19 has continued to have a profound disruption to both domestic and international supply chains through changed demand, forced border closures and changed production conditions.

Additionally, there has been a risk to the safety of our employees, customers and community as the rate of COVID-19 cases increased. We have undertaken significant work to ensure we continue to safely operate in South Australia during the coronavirus pandemic. We are committed to ensuring the wellbeing of our people and our customers as well as maintaining the electricity supply and critical services to the people of South Australia.

6 Consultation

In developing this statement, we consulted with all entities owned or controlled by SA Power Networks Group (as set out in Section 1: Identify the reporting entity). Consultation was undertaken at the Board level through consideration and approval of the statement by both the SA Power Networks' and Enerven's Boards. Throughout the year the executive group is made aware of legal compliance updates which includes our ongoing compliance with the Modern Slavery Act 2018.

In addition to SA Power Networks' and Enerven internal consultation, we also engage in industry consultation via the ESPA. The ESPA meet on a regular basis to discuss trends within our industry, gather insights from expert speakers and review case studies. SA Power Networks will continue to contribute to the ESPA and use the industry group as a means to shed light on pressing human rights impacts as they emerge.



7 Next steps

We acknowledge that there are improvements to be made to our modern slavery management and due diligence for both SA Power Networks and Enerven. While we are proud of our efforts this year in implementing the Informed 365 risk assessment platform and our industry engagement via EPSA, our focus in the future will be on incorporating findings from the risk assessment into a standardised annual operating procedure to address our modern slavery risk. Additionally, we will focus on creating a list of modern slavery KPIs to improve our ability to monitor and report on our performance.

Commitments and further improvements in FY22

- Create standardised modern slavery and human rights due diligence procedures across the business to ensure that clear procedures and accountability are part of SA Power Networks' and Enerven's modern slavery risk management framework.
- Develop a process for responding to sudden human rights risks including a company-wide approach to remediation. An example includes our response to growing concern within the Solar industry.
- Improve modern slavery awareness by making our internal education programs available to more of our team members.
- Drive a greater supplier response rate to the Informed 365 digital SAQ assessment program for suppliers in highest risk industries.
- Increase supplier engagement to focus on gaining transparency over highest risk tier 2 and tier 3 supply chains.
- Improve supplier engagement through sharing our experiences and working with EPSA members to explore opportunities to develop initiatives to improve supplier compliance to the Act.
- Perform due diligence deep dives in our supply chains, leveraging insights from supplier self-assessment questionnaires to assess our suppliers' policies, procedures and education programs.

Minimum Reporting Criteria	Page
1. Identify the reporting entity	4
2. Describe the structure, operations and supply chains of the reporting entity	8
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	14
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	18
5. Describe how the reporting entity assesses the effectiveness of such actions	22
6. Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	23
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	24

-  [sapowernetworks](#)
-  [sapowernetworks](#)
-  [sa-power-networks](#)
-  [sapowernetworks](#)
-  [sa_powernetworks](#)

SA Power Networks
) 13 12 61
 1 Anzac Highway, Keswick SA 5035
[sapowernetworks.com.au](#)

- Enerven 
- EnervenAU 
- enerven 
- Enerven AU 

Enerven
 1300 334 523)
 1 Station Place, Hindmarsh SA 5007
[enerven.com.au](#)

