

Modern Slavery Statement 2023-2024



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This statement outlines the steps taken by Western Power to mitigate the risk of modern slavery and human rights breaches in our business and supply chain in accordance with the *Modern Slavery Act 2018 (Cth)* for the financial year ending 30 June 2024.

Electricity Networks Corporation trading as Western Power (Western Power) is a Western Australian statutory corporation formed pursuant to the *Electricity Corporations Act 2005 (WA)*.

Western Power has a Board predominately comprised of independent directors and is accountable to the Western Australian Minister for Energy. Western Power does not own or control any other entities.

This Statement was approved by Western Power’s Board on 2 October 2024 and is signed by the Board Chair, Denise Goldsworthy.

Message from the CEO

As we progress the journey towards a clean energy future, it is vitally important that we continue to be an organisation underpinned by good governance and ethical and social responsibility standards.

We are committed to adhering to our Modern Slavery Statement, including improving our assessment of risks and increasing our collaboration with our suppliers to address where our operations or procurement practices can be improved.

This due diligence is vital to ensure our activities align with our values and strategy, and is a key focus for us as a business, essential service provider, and major enabler of decarbonisation in Western Australia.

Sam Barbaro



About Western Power

Western Power is a Western Australian State Government owned corporation responsible for building, maintaining and operating an electricity network that connects our 2.3 million customers in the southwest corner of WA to deliver an essential service to our community.

Our extensive transmission and distribution network, and the people behind it, seamlessly connect our homes, businesses and essential community infrastructure to an increasingly renewable energy mix. Western Power’s strategy is driven by an ambitious and forward-focused vision:

It acknowledges the collective effort in this exciting and challenging phase of WA’s energy transition towards decarbonisation. It includes our approach to addressing, managing and remedying instances where Western Power is at risk of perpetuating modern slavery, and reducing harm to individuals as we maintain, enhance and expand a network that enables industry and the State to achieve its decarbonisation goals.

Working together to power a cleaner energy future.



Western Power's modern slavery program

Western Power's modern slavery program employs a risk-based approach to assess, raise awareness, and drive actions to prevent and respond to modern slavery. This program consists of the following:

Setting expectations of suppliers

All suppliers, irrespective of risk level are required to adhere to Western Power's Supplier Code of Conduct which sets the minimum expectations of our suppliers, and they must attest compliance before commencing work with us and annually after that. Our supplier-facing website calls out modern slavery as a key focus, and the Ethical Supply Chain Guide increases awareness and provides more information on practical steps suppliers should take to eliminate modern slavery. This information includes how to raise concerns either directly to Western Power or through our anonymous whistle-blower hotline.

Due diligence

In the earliest stages of a procurement process our Risk Based Procurement Tool provides a practical method for our procurement team to categorise the ongoing risks posed by suppliers and identifies if further due diligence activities are required. The risk screening approach is built around the four key considerations that provide an overall risk rating:

- vulnerable populations
- high-risk business models
- high-risk sectors
- high-risk geographies.

When determining the appropriate controls to put in place with each supplier, we prioritise enhanced due diligence activities on suppliers by assessing the four factors listed above.

This includes evaluating Western Power's involvement to modern slavery (either passively or actively) and the level of influence Western Power has over our suppliers' practices.

For suppliers and procurement events that are identified as medium risk, controls are integrated into tender events and contract management practices to appropriately mitigate that risk level, including understanding a supplier's risk mitigation measures. Suppliers identified to be high risk have heightened due diligence activities such as desktop or physical audits, enhanced contract management and ongoing monitoring throughout the life of the contract.

This year procurement events for batteries, information and communications services, personal protective equipment and the construction of transmission network have included modern slavery due diligence.



Supplier Self-Assessment Questionnaire

Our Supplier Self-Assessment Questionnaire (SAQ) is a valuable tool to raise awareness of modern slavery with our suppliers and helps us gain a better understanding of their supply chains and risk mitigation activities. The SAQ is incorporated in our contract lifecycle management software and can be used during procurement events or ongoing supplier relationship activities to assess, monitor and improve our supplier's maturity in their approach to modern slavery.

Response and action guide

A Response Action Plan has been developed to follow the SAQ and sets out the recommended actions to be taken based on the overall risk a supplier presents. It is used in instances where suppliers are not meeting our minimum requirements and provides resources that our teams can use to communicate our expectations to suppliers and actions the supplier should take to rectify the identified issues.

Modern slavery training

Western Power team members involved in purchasing goods or services undertake awareness training which includes guidance on identifying modern slavery risks and remediation. Targeted training to our Category and Sourcing Specialists to confirm our commitments when conducting procurement and supplier relationship management processes is provided annually.



Modern slavery clauses in contracts

The risk screening approach determines the appropriate level of modern slavery provisions each supplier contract must contain. These include but are not limited to:

- an obligation to take reasonable steps to ensure personnel and supply chain participants do not engage in activity that would contravene human rights law
- adequate and reasonable policies, controls and procedures designated to prevent, detect, assess, manage and remedy modern slavery in operations and supply chains
- requirement that any arrangements entered with subcontractors include provisions that are at least as strong as Western Power’s own terms
- an obligation to notify us as soon as practicable after becoming aware of any actual or suspected activity.

Working with others

We are committed and pleased to participate in the Human Rights Resource and Energy Collaborative initiative, a consortium of resource and energy companies dedicated to sharing knowledge and insights common to our industries. This year, we have collaborated on renewable energy and the procurement of solar panels and batteries. The exchange of knowledge regarding supply chains, associated risks, and the approaches of other members has been invaluable as we strive to enhance the visibility and traceability of components, particularly in our Stand-alone Power Systems.



Modern slavery risks facing Western Power

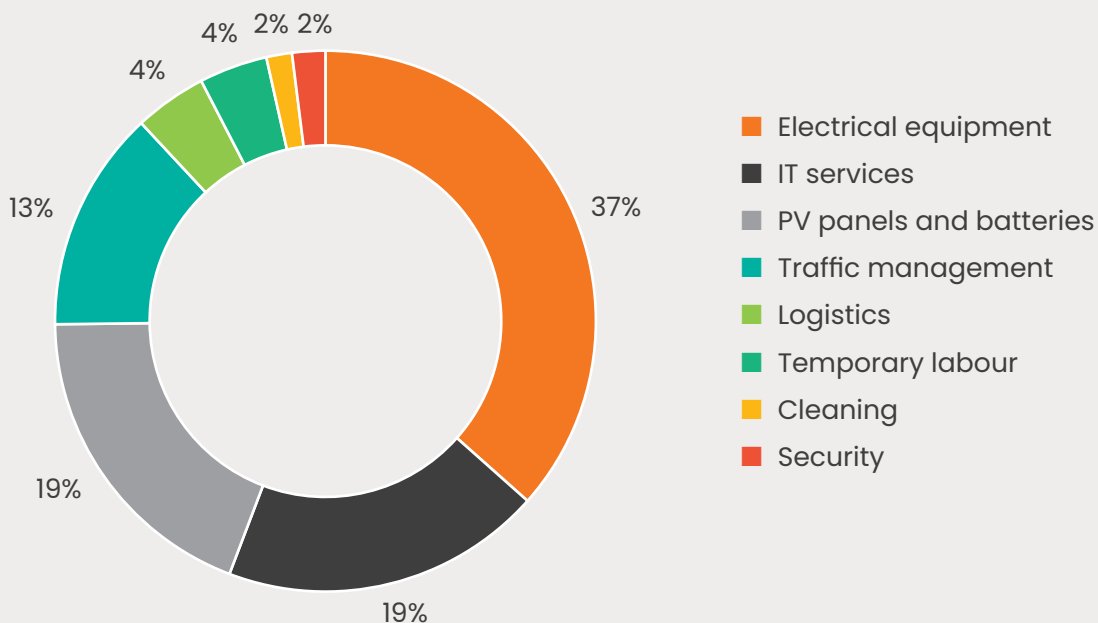
Since our last statement, we have not been made aware of any actual or suspected human rights breaches, either through our whistle-blower processes, our interactions with suppliers or through any other means.

Our suppliers

Currently, Western Power engages with approximately 2,486 active suppliers and manages 398 contracts through a centralised procurement function. Our commitment to 'buy local' ensures that 96 per cent of our suppliers are Australian businesses, and the risk of modern slavery within our direct supplier network remains low. However, we acknowledge that some of our local suppliers operate complex supply chains, which may elevate the risk of our purchasing decisions impacting modern slavery.

Our risk assessment for external spending during the 2024 financial year reveals that approximately 14 per cent of our spending with direct suppliers carries an inherently higher risk of modern slavery in their operations and supply chains. Figure 1 provides a breakdown of this spend by category, highlighting significant portions allocated to electrical equipment (such as cables, meters, and switchgear), IT services, photovoltaic (PV) panels, batteries, and traffic management.

Figure 1 – Category spend by highest risk rating



Our operations

Western Power employs most of our workforce through direct employment contracts, covering permanent, fixed-term, and casual positions across various technical, operational, and professional roles. Our employees work at our Head Office in Perth, metro and regional depots, and operational sites in Western Australia. All workplace agreements adhere to Australian employment law principles and Commonwealth legislation within the Fair Work Framework.

Additionally, we maintain a contingent workforce of approximately two per cent, sourced through labour hire agreements.

While this arrangement provides flexibility, it also presents heightened operational risk due to the absence of direct employment contracts between Western Power and these workers. Regular reviews of these arrangements are conducted by Western Power in order to mitigate this risk.

Our comprehensive policies cover employment screening, conditions, and workplace behaviour, applying universally to all Western Power employees. Through induction and mandatory training, we ensure that all employees understand our expectations and values, and know how to raise concerns if needed.



Effectiveness

Our modern slavery roadmap guides our strategic initiatives over a three-year period (2023–2025). We’ve made significant progress while reassessing the timing and relevance of certain activities to optimise our impact ensuring our efforts remain focused and effective in combating modern slavery. Our achievements to date are marked below:



Communication and awareness

- ✓ conduct tailored training for relevant personnel
- ✓ explore supplier engagement and partnership opportunities



Supply chain due diligence

- ✓ move beyond inherent risk
- ✓ enhance the supplier due diligence approach
- ✓ conduct a review of the grievance mechanism



Governance

- ✓ establish a formal governance structure
- ✓ strengthen how modern slavery is considered within the Risk function
- establish a schedule of periodic reviews of the existing program to assess effectiveness



Operational due diligence

- conduct organisation-wide operational due diligence over employee workforce
- conduct due diligence with a focus on employment arrangements with migrant workers and recruitment/labour hire services
- integrate operational due diligence into the modern slavery framework

Western Power is committed to combating modern slavery in our operations and supply chain. Our roadmap details a transparent approach to disclosing our activities and their associated risks. We pledge to actively collaborate with stakeholders to assess, manage, and remedy modern slavery issues, ensuring ongoing improvement in our practices.



For additional information or questions, please lodge your query via our website my.westernpower.com.au/contact-us/

If you'd like to let us know about a suspected wrongdoing, please contact Western Power directly on either 13 10 87 (General) or 1300 304 550 (STOPline).

This information is available in alternative formats if requested.

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