

Message from the Chair and CEO

The 2022/23 financial year (FY23) marked Horizon Power's fourth reporting cycle pursuant to the *Modern Slavery Act 2018* (Cth), a year in which we made strides in our internal approach to mitigating modern slavery risks in our operations and supply chains.

With support and directional guidance from our Board, our people helped deliver several key changes during FY 2022/23, highlighted below and explained in further detail in our Modern Slavery Statement (**Statement**):

- Developed a human rights framework to recalibrate how we assess and manage the risks of modern slavery.
- Collaborated with external subject matter experts to conduct a policy gap analysis to identify human rights gaps.
- · Updated our Supplier Code of Conduct.
- · Developed our Human Rights Policy.
- Engaged a new third-party due diligence platform and shared a customised modern slavery questionnaire with our suppliers, conducting an analysis of the results.
- Identified suppliers requiring deeper due diligence and commenced further engagement.
- Became an active member of the Human Rights Resources and Energy Collaborative (HRREC).

We remain firmly committed to assessing the risk of harm to people via the UN Guiding Principles on Business and Human Rights (UNGPs) by considering how we may cause, contribute to or be directly linked to adverse human rights impacts. The UNGPs will inform our response to the impacts, where identified.

As articulated in our Human Rights Policy, we pledge to:

- Recognise our responsibility, under the UNGPs, to respect human rights in all areas of our operations.
- Respect, at a minimum, internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
- Support the 10 principles of the United Nations
 Global Compact which relate to human rights, labour,
 environment and anti-corruption; additionally, we
 support the international agenda to abolish human
 trafficking, slavery, forced and child labour.

This Statement is a culmination of the work of our Procurement and Supply Chain and Legal teams, along with our Executive Management team, for the financial year ended 30 June 2023. This Statement has been approved by the Board of Horizon Power, the responsible governing body for the enterprise, on 15 December 2023. We are pleased to sign this on behalf of Regional Power Corporation, trading as Horizon Power.



Samantha Tough
Chair



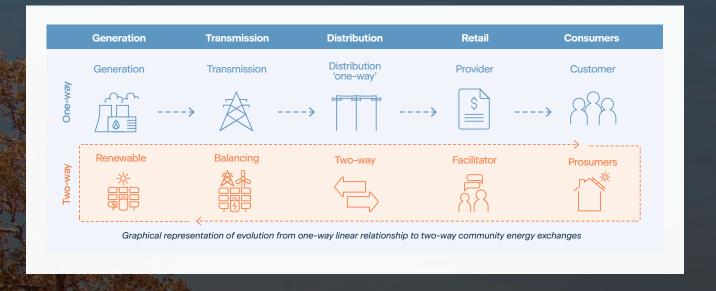
Stephanie Unwin
Chief Executive Officer

About Horizon Power

Regional Power Corporation, trading as Horizon Power (ABN 57 955 011 697), is a Government Trading Enterprise (GTE) and Western Australia's regional and remote energy provider, powered by an engaged local workforce working hard to ensure our customers receive safe and reliable power. Our vision is to deliver cleaner energy solutions for regional growth and vibrant communities.

As a vertically integrated utility, we operate across the full energy supply chain with generation, transmission, distribution and retail services. The future of energy is rapidly evolving and we

are partnering with customers to transition from a one-way linear relationship toward two-way community energy exchanges between renewables, households, businesses, electric vehicles (EVs), smart appliances and the Internet of Things (IoT).



Our service area is vast and covers approximately 2.3 million square kilometres. Horizon Power operates in the Pilbara, Kimberley, Gascoyne, Mid West and the southern region of Western Australia which includes the Southern Goldfields, Esperance, Hopetoun and Norsemen. We have regional depots based in Karratha, Broome, Kununurra, Carnarvon, Esperance and Port Hedland, with administrative support delivered from Perth.

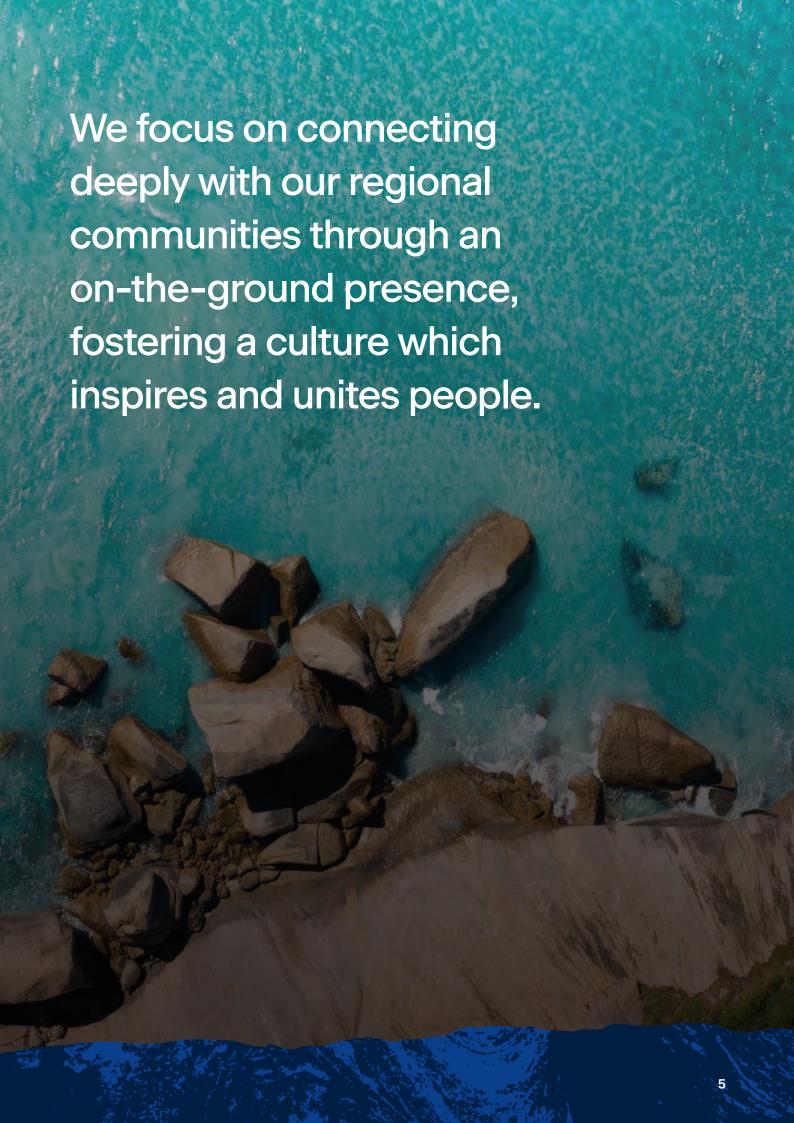
Horizon Power operates 38 systems delivering power to 46,662 residential, business and pre-payment customer accounts. Our service area includes the North West Interconnected System (NWIS) in the Pilbara; the connected network covering three interconnected systems in Kununurra, Wyndham and Lake Argyle; and 34 microgrids tailored to meet the unique needs of some of the most isolated and remote communities in the world.

This year, we also began assuming responsibility for the delivery of power to 117 remote Aboriginal communities, formerly under the responsibility of the Department of Communities.

We focus on connecting deeply with our regional communities through an on-the-ground presence, fostering a culture which inspires and unites people, demonstrating a commitment to Aboriginal peoples and protecting our shared environment.

Service areas and supply type





Our structure, operations and supply chain

Structure

Horizon Power operated under the Electricity Corporations Act 2005 (WA) (Act) up until 30 June 2023. The Government Trading Enterprises Act 2023 (WA) (GTE Act) came into effect from 1 July 2023 whereupon some of Horizon Power's enabling legislation is now the GTE Act. Horizon Power is governed by a Board of Directors accountable to the Minister for Energy, the Hon. Reece Whitby MLA. The Board is responsible to the Minister for Energy for the performance of the organisation and delegates the day-to-day management of Horizon Power to the Chief Executive Officer and executive management team.

Horizon Power does not own or control any other entities.

Operations

During FY23, Horizon Power employed approximately 562 people throughout regional WA, and its capital, Perth, with 525 people employed on a full-time equivalent basis. Horizon Power did not have any casual staff during FY23.

Horizon Power's employees perform a variety of roles, including Power Workers, Crew Leaders, Mechanical Fitters, Apprentices, Customer Service, Engineers, Legal, Procurement, Remote Communities Engagement, Compliance, Information Technology and Digital Transformation, Data Scientists, Finance and Accounting, Human Resources and Business Development. All roles are performed in Western Australia.

Fifty-seven of our direct employees were covered by our CEPU Wages Employees Enterprise Agreement and 471 were covered by our ASU Salaried Enterprise Agreement. To protect the privacy of our employees, we do not collect information regarding whether our employees are members of unions.

However, all employees have the freedom to join, or not join, unions related to their employment at Horizon Power.

Interests in joint arrangements

In March 2023, Horizon Power entered into a new joint venture with West Australian Alternative Energy (WAAE) with Green to Go Pty Ltd, the original owners of WAAE. WAAE is now jointly (50/50) owned by Green to Go Pty Ltd and Horizon Power. WAAE is a specialist renewable energy company which designs, installs and commissions solar and battery energy systems.

Through WAAE, we hope to:

- Support the delivery of Horizon Power's pipeline of solar photovoltaic (PV) and battery energy storage systems (BESS);
- Support Horizon Power in developing a standardised approach to integrating solar PV and BESS across our service areas;
- Trial innovation and optimisation of solar PV and BESS; and
- Build capability and reduce costs by managing supply chain logistics.

We retain 50% interest in
Boundary Power Pty Ltd, our
joint venture with Ampcontrol
Limited. Through Boundary Power,
we are commercialising design
and development expertise,
and developing both modular
and bespoke standalone power
system solutions for customers in
WA and across the country.

Supply Chains

Horizon Power aims to create opportunities for local suppliers in our regional areas by procuring local products and services where possible. We work closely with small businesses and community groups, including Regional Service Providers and local contractors, to create opportunities for economic development and investment in regional towns. Sourcing local goods and services also provides us with the benefit of better insight into our modern slavery risk and the ability to make real and positive change, should any modern slavery be identified in these areas.

Horizon Power has a supply chain of approximately 1,800 direct suppliers, predominately based in Australia. Horizon Power procures and sources a wide range of products and services, including consultancy, construction, electrical works, finance and commercial, health, safety and environmental, IT hardware and software, advertising, corporate staff

training, hospitality and function venues, printing and stationery, insurance, record management, utilities, fleet, forklifts, fuel, mail/courier services, logistics, transport/warehousing, civil maintenance and capital works, traffic management, vegetation management, BESS, cables, major equipment, solar equipment, electrical consumables, tools and equipment, cleaning, security and fire services, office furniture, property repairs and maintenance, safety/PPE/uniforms and temporary labour.

Although the bulk of our direct suppliers are based in Australia, many are likely to rely on global supply chains in the provision of goods or services to us. We recognise that some countries with a higher prevalence of, and vulnerability to, modern slavery, are likely to be sources for raw materials and components that make their way into finished products sold by our direct suppliers.

We continued to engage with suppliers through a variety of methods this report period, ranging from one-off transactional purchase orders to strategic operational and ongoing contracts and high value one-off project spends. We continue to operate a centre-led procurement model based on our Procurement & Contract Management Policy, in alignment with our internal procurement policies, strategies, guidelines and any applicable government legislation. Our Social Procurement and Policy Manager further supports our business in our commitment to Horizon Power's approach to modern slavery. The procurement team reports to the Chief Financial Officer.

Geo-political tensions continue to contribute to supply chain constraints and challenges. We understand that these conditions have the potential to worsen the situation for those already affected by modern slavery conditions in regions impacted by conflict.

Modern slavery risks in our operations and supply chains

The term 'risk' in this context is used to refer to the risk of harm to people within our operations and our supply chains.

For the reasons described in this Statement, we consider it unlikely that Horizon Power has caused or contributed to modern slavery within our direct employment of workers in our operations. The policies, controls, training and oversight that we have in place to protect the rights and entitlements of our employees mean that there is very low risk of labour exploitation, which on the continuum of seriousness, can end with slavery at the most serious end, followed by servitude, forced labour and debt bondage.

The salient modern slavery risks exist in our supply chain, and those of our joint ventures, as we move ahead in our decarbonisation journey, supporting our commitment to reduce greenhouse gas emissions. The complex supply chains supporting the central technology we rely on to achieve the above goal has been linked to forced labour and the worst forms of child labour. As noted in the Clean Energy Council's paper 'Addressing Modern Slavery in the Clean Energy Sector':

In recent years, media and non-government organisations have published detailed allegations of forced labour within the global solar supply chain.
 The reported risks are linked to the Xinjiang Uyghur Autonomous Region (Xinjiang) of China, the origin of approximately 40-45% of the world's solar-grade polysilicon – a key component of the world's solar modules. Approximately 2.6 million Uyghur and Kazakh citizens are alleged to be subjected to 'surplus labour' programs and there are concerns that many workers in these programs are unable to refuse such work or are ultimately unable to leave these jobs.

- Independent audits of the sites involved have, however, been impossible to obtain. In the absence of independent audits, the available evidence shows that there remains a significant risk that any solar cell manufactured in Xinjiang, or incorporating polysilicon manufactured in the region, is implicated in forced labour.
- The high proportion of global polysilicon manufactured in Xinjiang means the risk of forced labour entering the supply chains of Australia's solar energy industry is significant.
- Lithium-ion batteries now account for over 50% of global cobalt consumption.
- The modern slavery concerns surrounding cobalt primarily rest with small-scale mining in the Democratic Republic of the Congo (DRC), in which approximately 250,000 people, including at least 35,000 children, work in artisanal mines, many of whom could be assessed as subject to forced labour or modern slavery.

Modern slavery risks in our broader supply chain are described in this Statement under the section describing our due diligence process.

Our actions to assess and address risks

Measures in relation to our workforce

As noted earlier in this Statement, the majority of our employees are covered by either the CEPU Wages Employees Enterprise Agreement or the ASU Salaried Enterprise Agreement. The ASU Salaried Enterprise Agreement was approved by the Fair Work Commission on 20 December 2022 and came into operation from 27 December 2022. The CEPU Wages Employees Enterprise Agreement operated during FY23. These agreements contain the rights, conditions and entitlements of workers and include matters such as rates of pay, leave entitlements, hours of work, classification structures and dispute settlement procedures among other things. Enterprise agreements are one of the key mitigating measures, along with the following additional measures:

- In accordance with the WA Government State
 Wages Policy, the 2022 Korn Ferry benchmarked
 salaries were increased by 3.0%. During FY23, the
 new rates were utilised for internal movement and
 new candidates.
- Horizon Power did not employ workers under the age of 18.
- Visa Entitlement Verification Online system (VEVO) checks were conducted to ensure that candidates have Australian working rights. During FY23, we had one Temporary Visa (408) holder working in a customer service officer role.
- Workers living in accommodation arranged by Horizon Power were housed in premises that met regulatory requirements and workers were free to enter and exit premises freely.
- Horizon Power's Senior Manager People & Capability team monitors any excessive working hours and accrual of excessive leave balances.
- All employees have the freedom to join, or not join, unions related to their employment at Horizon Power.

Measures in relation to our joint ventures

Horizon Power works with and encourages our joint venture partners to adopt systems which will assist them in assessing and managing modern slavery risks in their operations and supply chains. For example, WAAE's modern slavery policy sets out the following:

'West Australian Alternative Energy recognises the ongoing modern slavery issue within our industry and is committed to sustaining ethical business practices and standards to combat this human rights issue.

To ensure the ethical sourcing of products, WAAE asks each supplier that sources materials from known areas where modern slavery may be in place to provide us with a detailed modern slavery statement. This document will pertain information regarding how the supplier sources their materials and the audit processes they place on these sources. WAAE will then evaluate if this supplier has in place adequate procedures to manage modern slavery before they become a preferred supplier.'



Policy framework and governance

During FY23, we engaged external subject matter experts to better understand the measures that are required to mitigate modern slavery risks in our operations and supply chains. As a result, Horizon Power chose to adopt a human rights approach, within which modern slavery is a significant subset.

From this starting point, we conducted a policy gap analysis to identify potential human rights gaps in our operations and our procurement processes. We were then able to take steps to eliminate those gaps by updating the relevant policies and procedures.

Additionally, we developed our Human Rights Policy and updated our Supplier Code of Conduct during FY23. The Supplier Code of Conduct defines our minimum standards of conduct and expectations of our suppliers and their supply chains. It links to our Human Rights Policy and our commitment to respect human rights. Our suppliers are obliged to comply with the following:

- Ensure workers have freely chosen employment, with no forced, bonded or indentured labour.
- Avoid unreasonably restricting workers' freedom to move into, out of or at working facilities.
- Ensure that workers under the age of 18 do not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.
- Do not permit harassment, abuse, corporal punishment or inhumane treatment of its workers.
- Permit freedom to move and associate, including collective bargaining and seek representation in accordance with local laws.
- Offer fair and transparent terms and conditions of employment including fair remuneration that provides for an adequate standard of living, working hours and working conditions.

- Ensure measures are taken to be aware of, preserve and protect registered and potential heritage sites in our service areas.
- Notify us if they, or their subcontractors or suppliers, have been convicted, had a notice served upon them, or an order made against them for infringement of modern slavery laws anywhere in the world.
- Have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.
- Ensure that their operations or supply chains do not adversely impact local communities, including human rights and land rights, with specific consideration to Indigenous communities' rights to free, prior and informed consent.
- Provide stakeholders and workers access to a grievance mechanism to raise concerns confidentially without fear of retaliation.

During FY23, we began updating our template agreements to require compliance with our Supplier Code of Conduct.



Supplier due diligence

During FY23, we began using the Modern Slavery Questionnaire (MSQ) via the Ethixbase360 platform as part of our supplier accreditation and on-boarding process. The Ethixbase360 modern slavery questionnaire provides Horizon Power with an informed and structured impact assessment, an essential tool to help identify our supply chain priorities. With the support of our external subject matter experts, the results of the MSQ were analysed and the suppliers requiring further due diligence were identified.

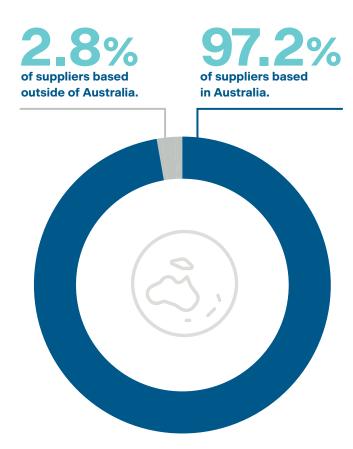
The MSQ contains questions designed to assess the modern slavery risks in a supplier's business. The responses to the questions are weighted based on data analytics driven by global indices on modern slavery and human rights risks, including the:

- · World Bank Governance Indicators
- Global Slavery Index
- US Department of State Trafficking in Persons Report
- US Department of Labor List of Goods Procured by Child Labor or Forced Labor
- Transparency International's Corruption Perception Index.

The risk scoring of the MSQ focuses on:

- Jurisdiction of the supplier's headquarters and operations
- Industry of the supplier
- Products which are linked to higher risks of modern slavery
- Workforce demographics to understand the use of potentially vulnerable categories of workers
- Controls to mitigate, assess and address risks

Risk ratings of low, medium or high are determined by weighting each question to enable risks to be accurately captured. As shown below, suppliers that completed the MSQ were predominately based in Australia, in alignment with Horizon Power's commitment to local procurement.



However, direct suppliers to Horizon Power operate in many different countries, as shown on the map below:



By using the MSQ, we identified suppliers that were exposed to higher modern slavery risks, such as those involved in:

- · fabricated metal product manufacturing;
- · structural metal product manufacturing;
- · industrial machine manufacturing;
- · construction;
- motor vehicle and transport equipment rental and hiring;
- electrical wiring, lighting, cable and solar equipment wholesalers.

The combination of a supplier operating in a higher risk industry with components sourced from higher risk countries tended to result in red flags, further heightened in the absence of controls and policies to mitigate human rights risks or the absence of human rights impact assessments. We also identified two suppliers that disclosed potential supply chain linkages to Xinjiang.

The results and recommendations arising from the MSQ provide the foundation for Horizon Power to undertake further engagement with higher risk suppliers and the integration, tracking and communication stages of due diligence as per the UNGPs.

Remediation

The concept of 'remedy' is drawn from the UNGPs which describe the responsibility to remedy adverse human rights impacts. The UNGPs provide that:

"Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes." The UNGPs also state that when an entity is directly linked to adverse impacts via a business relationship, it should seek to use its leverage to encourage remediation by those that cause/contribute to those adverse impacts.

Our approach to remediation is set out below:

DEGREE OF INVOLVEMENT				
CAUSE	CONTRIBUTE	DIRECTLY LINKED		
An entity may cause modern slavery if its operations directly result in modern slavery practices.	An entity may contribute to modern slavery if, through its actions or omissions, it facilitates or incentivises modern slavery practices.	An entity may be directly linked to modern slavery via a business relationship, where it does not cause or contribute to the modern slavery risk.		
Example: Using forced or exploited labour. Given the workforce profile of Horizon Power, it is unlikely that Horizon Power will be in a situation where it causes modern slavery through its recruitment of employees.	Example: This may include setting unrealistic cost restraints on a third party that can only be met by that third party using forced or exploited labour.	Example: Horizon Power's supplier is an entity that has modern slavery in its operations or supply chain.		
PREVENTION AND MITIGATION				
Cease or prevent the impact.	Cease or prevent contribution and use leverage to mitigate impact.	Seek to prevent and mitigate the impact. Appropriate steps may depend on leverage, availability of alternate vendors, significance of contractual relationship, severity and consequence of termination.		
REMEDIATION MEASURES				
Provide for or cooperate in remediation.	Provide for or cooperate in remediation.	Take a role in remediation, including using leverage to encourage remediation by entities that caused or contributed to the impact.		

Measuring effectiveness

In our 2022 Modern Slavery Statement, we established goals to be achieved during FY23 as a measure to demonstrate year-on-year improvement on our ability to assess, mitigate and prevent modern slavery risks in our operations and supply chains.

We have tracked our progress as described in the table below and identified new goals for FY24, with detail on how we aim to measure effectiveness moving forward.

FY23 GOAL	FY23 PROGRESS
Review and improve the response rate of suppliers to the self-assessment questionnaire; analyse results to best target our future strategies.	We deployed the Ethixbase360 platform which has automated reminder notifications. We worked with external subject matter experts to target follow-up correspondence with non-responders and also to review the results of the MSQ to inform our next steps.
Expand staff education.	Our Social Procurement and Policy team delivered knowledge sharing and updates on our human rights framework to key stakeholder teams and key sourcing officers.
Enable suppliers agreement with and adoption of our Supplier Code of Conduct.	We identified limited areas within the Code that require further refinement to align with best practice. During FY24, the Supplier Code of Conduct was updated and underwent an approval process.
Honour our commitment to the Clean Energy Council's Pledge against Modern Slavery.	In accordance with the pledge, we are adopting a Human Rights Framework to embed our commitment to respect human rights across our business and supply chains.
Actively participate in relevant working groups such as the Clean Energy Council's Risks of Modern Slavery Working Group.	We continued to participate in the working group meetings held throughout the year.
Collaborate with relevant industry bodies to share ideas and strategies and identify what other organisations are doing in this space.	This year, we joined and became an active member of the Human Rights and Energy Collaborative (HRREC) to facilitate the exchange of ideas and best practice.
Continue to map our growing supply chain.	The Ethixbase360 platform has supported our efforts to map our supply chain.
Consult with impacted suppliers to develop and implement audit and remediation plans, where required.	Following the results of the FY23 MSQ, our external subject matter experts analysed the data and identified higher risk suppliers requiring further due diligence and engagement. We will continue these discussions with suppliers during FY24.
Investigate and implement measures that can be adopted during the supplier on-boarding process to identify modern slavery risks.	The deployment of the Ethixbase360 platform has enabled us to embed the assessment of modern slavery risks at on-boarding.
Implement modern slavery reporting into our procurement information and supply management software to enable surveying and monitoring of a broader category of suppliers.	While not integrated into our procurement information and supply management software, the Ethixbase360 dashboard provides information to enable real time monitoring of the risk landscape based on the MSQ responses.

Looking forward

Our key goals for the next reporting period are set out below, along with how we will aim to measure the effectiveness of the measures we have sought to implement. This may occur over subsequent reporting periods and potentially evolve over time as we continue to refine our approach and seek to align to best practice.

FY24 GOAL	MEASURE OF EFFECTIVENESS
Operationalise the Supplier Code of Conduct and MSQ within our procurement processes.	The majority of our suppliers accepting our Supplier Code of Conduct and completing the MSQ upon request.
Finalise template agreements with human rights clauses.	 The majority of our agreements being signed with appropriate human rights clauses. Our employees understand the criticality of including human rights clauses, especially in higher risk contexts.
Develop a remediation methodology.	 Equipping our employees with an understanding of what remediation entails and the different processes that may be considered if and when instances of adverse human rights impacts, including modern slavery, are found in our operations or supply chains.
Engage with our joint venture partners in relation to the measures they have in place to assess and address modern slavery risks.	 Increased awareness of the modern slavery risks in high-risk supply chains. The introduction of adequate procedures to assess, mitigate and prevent modern slavery risks.
Roll out the MSQ to FY24 suppliers and assess and compare the results against FY23 to identify any changes and trends.	 No increase in the average MSQ risk rating. Increased completion rate.
Further engagement with selected suppliers arising from the FY23 MSQ.	 Open dialogue with selected suppliers regarding the potential issues identified during the MSQ process. Identifying suppliers with irremediability and assess Horizon Power's ongoing procurement from the suppliers in this category. Collaborating with suppliers to increase awareness and capabilities to assess and address modern slavery risks, e.g., via shared training.
Roll out business-wide modern slavery training.	A high completion rate and increased awareness of modern slavery within all parts of our business.

Other information

We are an active member of the Energy Procurement Supply Association (EPSA), an Asia Pacific not-for-profit association of energy industry procurement and supply professionals.

In the reporting period, we also became an active member of the Human Rights and Energy Collaborative (HRREC). The HRREC is a group of Australian energy and resources companies that work together to address modern slavery risks and broader human rights issues in our operations and supply chains.

In November 2021, and updated in June 2023, the State Government released the Supporting Continuous Improvement in ESG Outcomes for WA, outlining the State's commitment to contributing to the objectives of the UNSDGs. As a Western Australian Government Trading Enterprise, we recognise the importance of supporting our State Government's

contribution to the UNSDGs. The UNSDGs provide a universal framework used to shape strategies to address challenging global sustainability issues. While Horizon Power supports all 17 UNSDGs, we identified a list of key priorities which have the greatest potential to make real and meaningful contribution to our sustainability goals. The priorities are grouped into themes which reinforce and support our corporate strategy. The priorities were identified by internal stakeholders from across key areas of the business, helping to inform the foundation of our sustainability framework.



SUSTAINABLE GALS





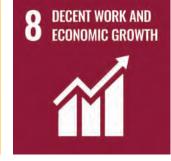






























Modern Slavery Act 2018 (Cth)

Statement Annexure

MANDATORY CRITERIA	HEADING AND PAGE NUMBER/S
Identify the reporting entity.	Message from the Chair, Page 2
Describe the reporting entity's structure, operations and supply chains.	About Horizon Power, Page 3 Our structure, operations and supply chain, Pages 6-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Modern slavery risks in our operations and supply chains, Page 8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our actions to assess and address the risks, Pages 9-13
Describe how the reporting entity assesses the effectiveness of these actions.	Measuring effectiveness, Pages 14-15
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	N/A - Horizon Power does not own or control any other entity.
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Other information, Pages 16-17



