



Modern Slavery Statement 2025



Acknowledgement of Country

In the spirit of reconciliation, Transgrid Group acknowledges the Traditional Custodians of the lands where we work, the lands we travel through and the places in which we live. We pay respects to the people and the Elders past, present and emerging, and celebrate the diversity of Aboriginal and Torres Strait Islander peoples and their ongoing cultures and connections to the lands and waters of NSW and the ACT.

Front cover: Christian Johane – Substations Technician
Amy Longmuir – Substation Technician Apprentice
Murrumbidgee River, Riverina NSW
Artwork: Yura. Gili. Nanga. the indigenous interpretation of Power.
People. Possibilities.



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Message from the CEO



Brett Redman

Chief Executive Officer
Transgrid Group

The energy that runs the homes and businesses in New South Wales and ACT is shifting, and Transgrid is a key part of Australia's energy transition. As NSW moves from about 40% renewables today to about 90% in 2035, the scale and speed of our work will intensify. With this rapid growth comes greater responsibility. A larger program of delivering projects and procurement increases the risk of modern slavery, particularly in construction and manufacturing of network equipment, where global supply chains are complex. Managing these risks is part of responsibly building the future grid.

Transgrid is committed to identifying, preventing and addressing modern slavery risks in line with the United Nations Guiding Principles on Business and Human Rights. Our risk is relatively low compared to other industries, but we continue to strengthen supplier relationships, embed more robust processes and ensure risks are managed early and transparently.

Our approach reflects our core values: Safety, Achievement, Integrity and Service. Guided by these, we build strong partnerships with suppliers so risks are identified and addressed together. Delivering the energy transition with our partners is not only about building infrastructure, it's also about protecting people and strengthening trust.

This Modern Slavery Statement 2024-25 outlines the progress we have made. We remain committed to transparency and annual reporting as we move through the deep transition of renewable energy and into the new transitioned era in 2035 and beyond.

This Statement has been approved by the Boards of Directors of NSW Electricity Networks Operations Pty Limited and NSW Electricity Networks Assets Pty Limited in their capacity as the principal governing bodies of Transgrid Group.

Reporting Criteria 1: Reporting Entity

This joint statement has been prepared in relation to the mandatory reporting requirements of the Modern Slavery Act 2018 (the Act) for the period 1 July 2024 to 30 June 2025. It covers NSW Electricity Networks Operations Pty Limited (ACN 609 169 959) and NSW Electricity Networks Assets Pty Limited (ACN 609 169 922) (together referred to as we, us, our or Transgrid), which are the entities in the Transgrid Group of companies which met the Act's reporting criteria.



Sam Isaac Martin – Transmission Line Apprentice

Reporting Criteria 2:

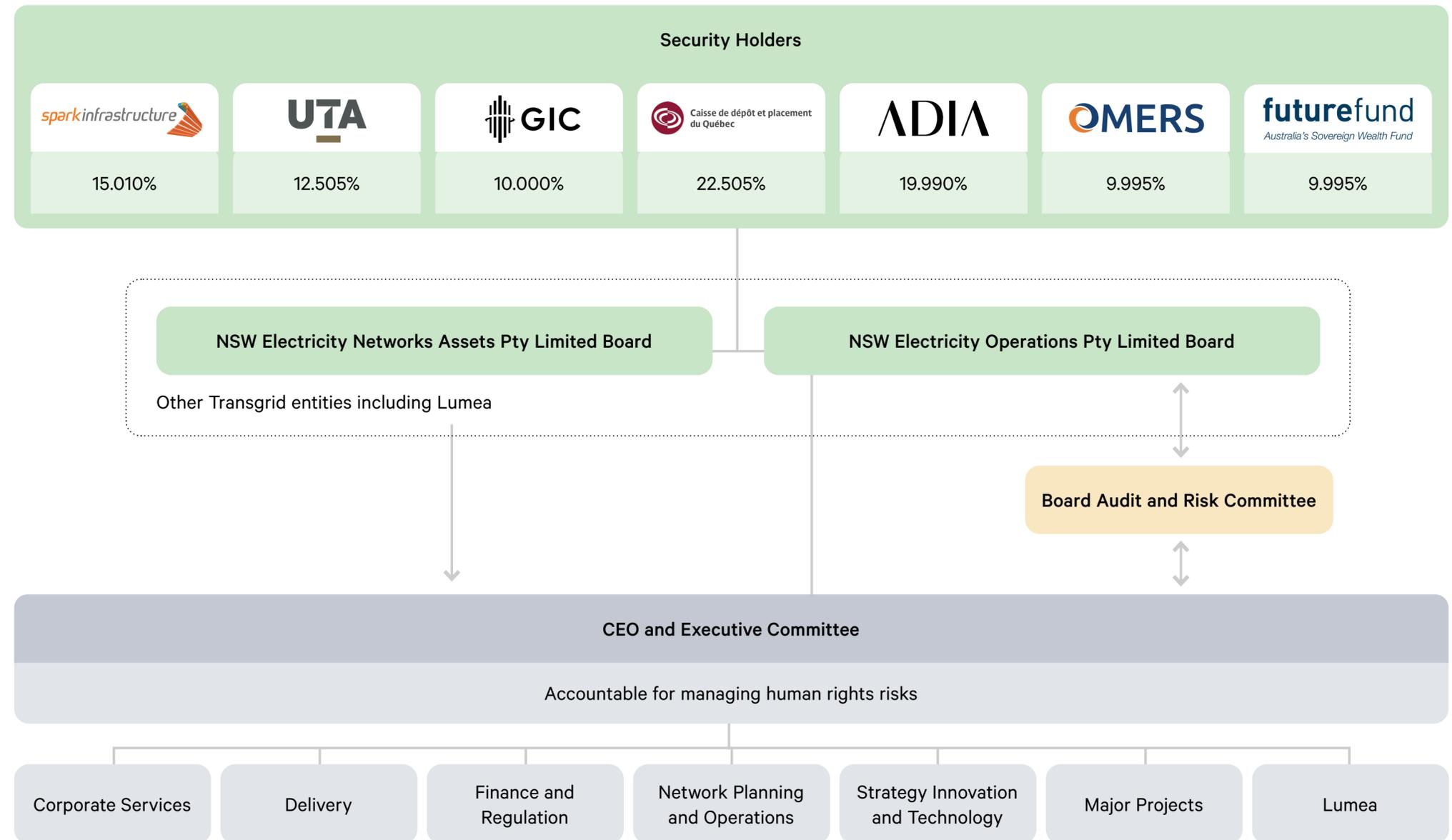
Structure, operations and supply chain

Transgrid builds and maintains the largest electricity network in Australia, providing the backbone of the National Electricity Market while supporting the transition to a renewable energy future. The Transgrid Group consists of Transgrid and Lumea. Transgrid is headquartered in Sydney, with an office in Melbourne and depots in Western Sydney, Newcastle, Orange, Tamworth, Wagga Wagga and Yass.

The ownership structure of Transgrid Group is depicted to the right.

In FY25, the Transgrid Group's operations continued without significant change from previous years.

Graph 1 Transgrid Group's ownership structure



131
substations and
switching stations



13,570 km
high-voltage transmission lines
and underground cables



1,994
total employees



85%
on an Enterprise Agreement

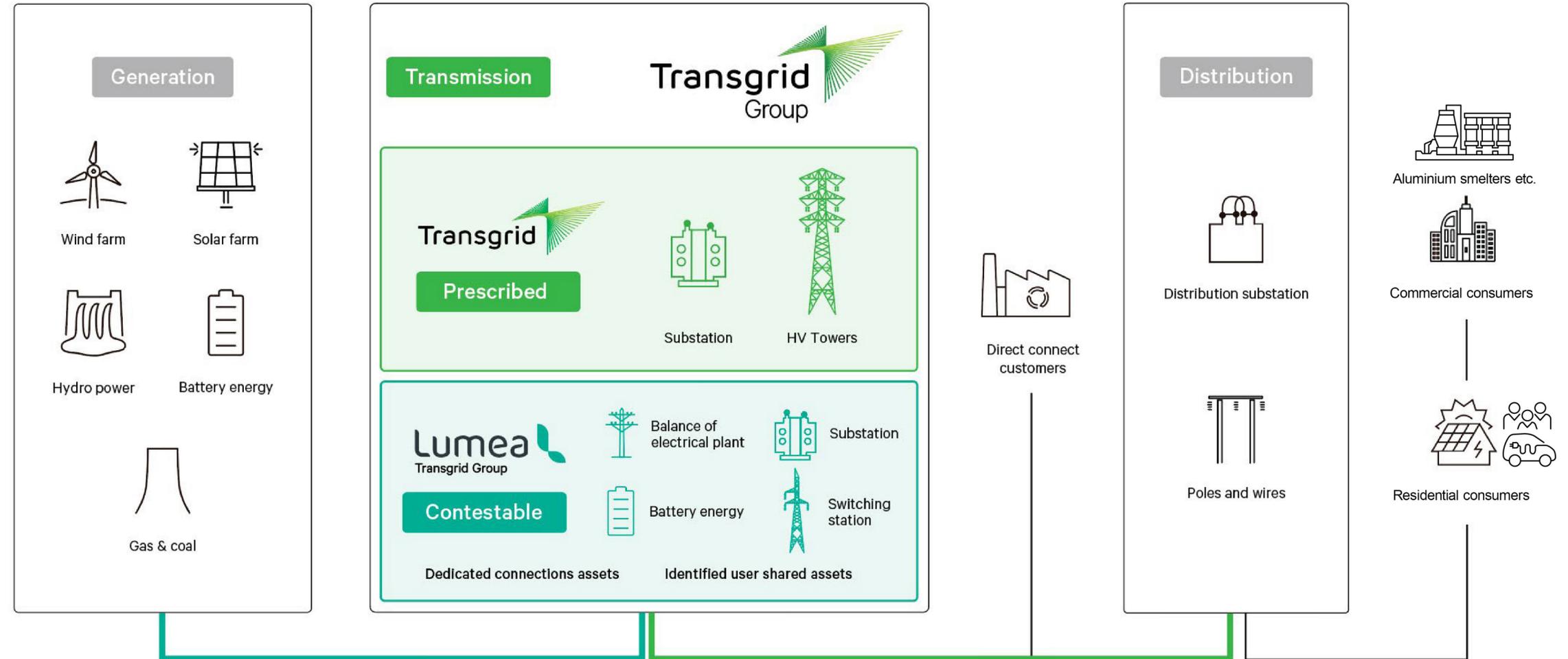
Transgrid

Transgrid’s network transports electricity from multiple generation sources, including wind, solar, hydro, gas and coal power plants, to large directly connected industrial customers and the distribution networks that deliver it to more than three million homes and businesses. As a major transmission network service provider, Transgrid is building the significantly expanded grid infrastructure needed to support a renewable-based energy system. Major projects, including EnergyConnect, HumeLink, VNI West, Hunter Transmission Project, and Sydney Ring, are essential to getting renewable energy to market. We are also working closely with EnergyCo to plan, develop and deliver Renewable Energy Zones and their transmission connections in NSW.

Lumea

Lumea is a leading connector of renewables to the National Electricity Market, providing customers with new transmission and connection infrastructure as well as portfolio and asset management services. Its independent ‘fibre in the sky’ Optical Ground Wire network benefits from being built atop Transgrid’s transmission infrastructure, providing assurances on physical as well as cyber security. Lumea owns and operates a network of transmission and communications towers available for co-location across NSW and the ACT, offering data services backhaul for high-speed connectivity.

Graph 2 – Transgrid Group and Lumea operations



1. Prescribed services are those that only Transgrid as primary Transmission Network Service Provider can provide in NSW and the ACT
2. Non-prescribed business includes all negotiated or contestable transmission or energy services.

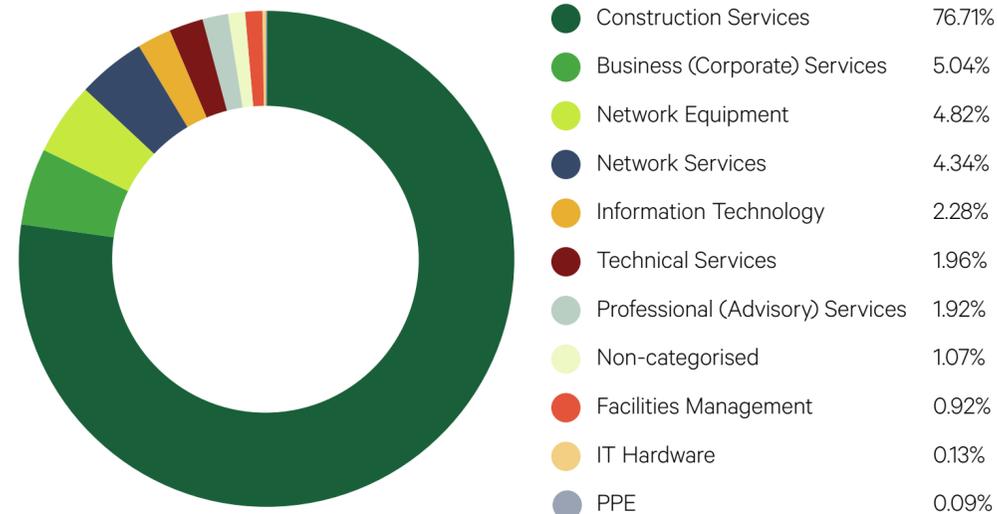
2.1. Our supply chain

Transgrid is undergoing a period of rapid growth to support Australia’s energy transition. As we deliver major projects across NSW and the ACT — including EnergyConnect, HumeLink and VNI West — our procurement activity has increased significantly. This includes greater demand for construction services, raw materials, network equipment, and support services such as IT and recruitment. As a result, the scale and complexity of our supply chain has grown with corresponding potential exposure to the risk of modern slavery.

In FY25, Transgrid spent approximately \$2.5 billion (a 66% increase compared to FY24) across more than 1,800 active suppliers, with less than \$15m with non-Australian-based suppliers.

Construction remains our largest procurement category driven by major projects, followed by Corporate Services and Network Equipment.

Graph 3 – Transgrid Group expenditure by category



Amy Longmuir – Substation Technician Apprentice
Taylor Madden – Substation Technician

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Reporting Criteria 3:

Risks of modern slavery in Transgrid’s operations and supply chain

3.1. Risks in our operations

Safe and reliable operations remain Transgrid’s highest priority. While our workforce grew from 1,756 in FY24 to 1,994 in FY25, the risk of modern slavery within our directly employed workforce is considered low. All direct employees are based in Australia, and about 85% are covered by the Transgrid Workplace Determination 2025 which is approved by the Fair Work Commission. The remaining employees are on individual employment contracts underpinned by Australian workplace laws, providing a strong framework for fair and safe working conditions.

While our directly employed workforce is well-protected, we acknowledge that there is always potential for some workers to be vulnerable due to their employment arrangements, immigration status, job type, or limited awareness of their rights.

In addition to direct employees, Transgrid also accesses workers via short-term labour hire. These workers are not Transgrid employees but are considered part of our operations. Many of the controls that protect these workers—such as supplier due diligence and contract terms—are managed through Transgrid’s procurement team.

In FY25, Transgrid had 88 short-term labour workers of which 71% were white-collar highly skilled professionals, which typically lowers their vulnerability. We are also mindful that job type alone does not eliminate risk and Transgrid continues to assess risk factors such as labour-hire agency practices. In FY26, we will conduct an overall review of short-term labour contracts and seek further assurance of the employment conditions of labour-hire agency workers.

3.2. Risks in our supply chain

This year Transgrid maintained the same risk-based approach to identify potential high-risk areas of modern slavery in its supply chain. We continue to assess risks against the following criteria:

- vulnerable populations
- high-risk geographies
- high-risk industries
- complex supply chain.

As a result, our key focus remains on the following categories:

Graph 4 – Potential high-risk categories



Network equipment

Transformers, static volt-ampere reactive (VAR) compensators, synchronous condensers, capacity banks and HV components are primarily sourced from Asia



Personal Protective Equipment (PPE)

We have identified garments that have been manufactured offshore



Electronics

Hardware components and services are primarily manufactured and provided by organisations with support services based in developing countries



Construction labour

Employment practice visibility can be limited when Tier 2 or Tier 3 companies subcontract low-skilled or unskilled labour for construction projects

We also look at our potential exposure to modern slavery from three angles. This helps us understand various aspects of these risks and guides our response:



Causing modern slavery practices:

directly engaging in exploitative practices in business operations



Contributing to modern slavery practices:

indirectly facilitating, incentivising or contributing to modern slavery



Directly linked to modern slavery practices:

risks that a company’s supply chain may be connected to modern slavery through supplier relationships

The table below outlines our priority potential risk areas, highlighting potential areas of exposure as opposed to confirmed instances of risk.

Risk category	Key risk factors	Our relationship to risk
Construction	<ul style="list-style-type: none"> • Use of low-skilled or migrant labour: who may face vulnerability. • Reliance on third-party providers: subcontracted arrangements may reduce oversight of employment conditions. • Complex multi-tiered supply chains: potential to reduce transparency and increased risk of sourcing from high-risk countries. • Limited access to grievance mechanisms: workers may not have clear and safe communication channels through which to report concerns. 	<p>Contribute or directly linked</p> <p>Potential exposure to modern slavery risk through engagement of contractors; some may rely on labour hire or source materials from high-risk countries.</p>
Network Equipment	<ul style="list-style-type: none"> • Complex multi-tiered supply chains often reduce visibility, with the potential for components to be sourced from high-risk countries. • Contractors' use of high-risk raw materials: inputs such as copper have potential for links to forced labour in global supply chains. 	<p>Directly linked</p> <p>Potential for direct links through suppliers using raw materials and components sourced from high-risk countries where we may not have visibility across all tiers of the manufacturing process.</p>
PPE	<ul style="list-style-type: none"> • Complex multi-tiered supply chains often reduce visibility, with potential for manufacturing facilities located in countries with weak labour protection. • Competitive pressure can drive suppliers to cut corners on standards. 	<p>Directly linked</p> <p>Potential for direct link through suppliers sourcing of raw materials and manufacturing in high-risk countries, where visibility across the full supply chain is limited.</p>
Electronics	<ul style="list-style-type: none"> • Complex multi-tiered supply chains have potential to reduce visibility, with manufacturing facilities often located in countries with weak labour protection. • High-risk raw materials, inputs such as cobalt and lithium have potential links to modern slavery. 	<p>Directly linked</p> <p>Potential for direct link through electronics suppliers' use of raw materials mined in high-risk regions and where complex multi-tier manufacturing processes reduce visibility.</p>



Sam Isaac Martin
– Transmission Line Apprentice

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Actions taken to address risks, including due diligence and remediation

FY25 highlights



Governance

Transgrid has embedded modern slavery risk due diligence and protections in its procurement policy, processes and framework.



Capability

Detailed modern slavery training has been rolled out to Transgrid's procurement team.



Continuous improvement roadmap

Transgrid has developed a three-year modern slavery roadmap as part of continuous improvement.

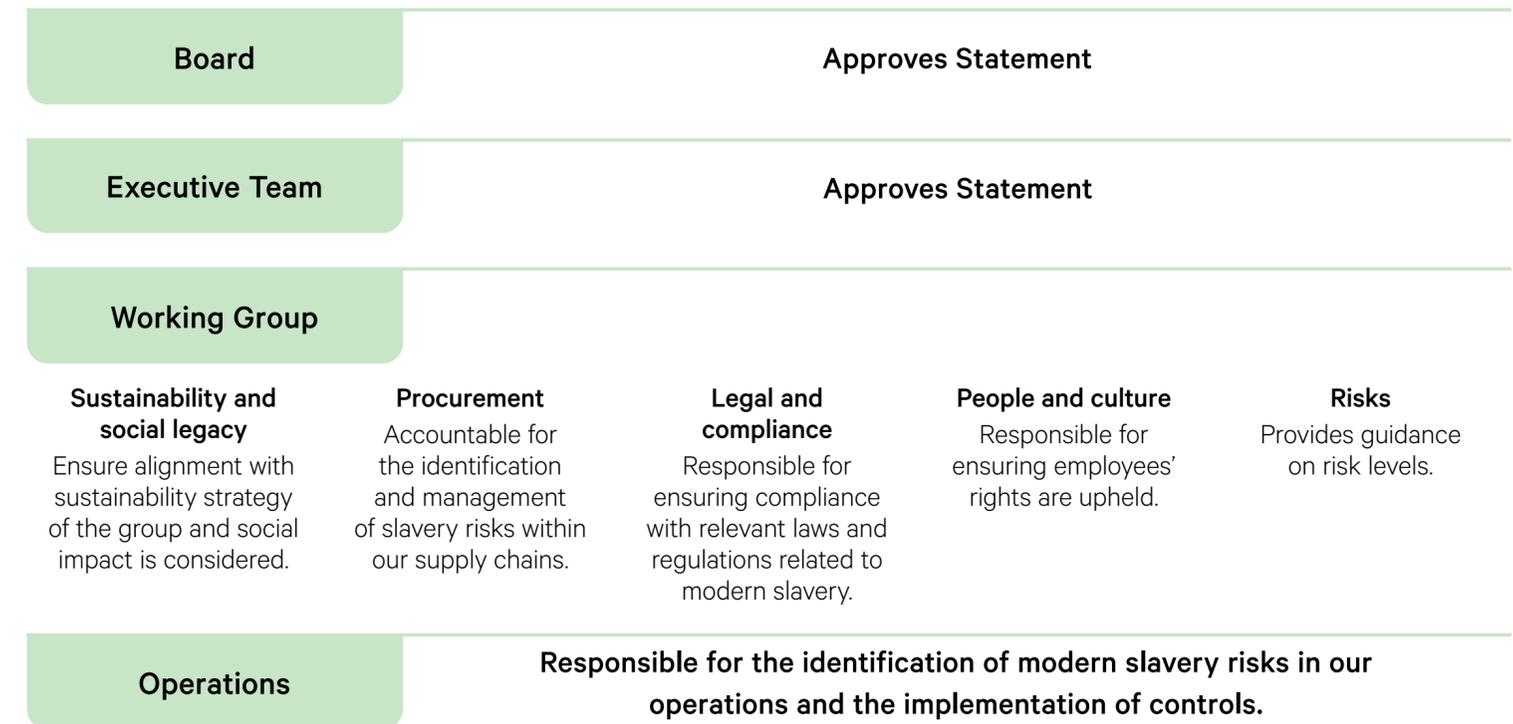


Grievance mechanism

Transgrid has updated its grievance policy to clearly apply to suppliers and contractors, along with clear and specific references to modern slavery.

4.1. Our governance

Our approach to managing modern slavery risks starts with a governance framework combined with our team's clear understanding of the role they play in managing modern slavery risks. Accountability for modern slavery risks starts with the Board, then our Executive and is cascaded down through our management team. Our cross-disciplinary working group plays a key role in modern slavery monitoring by bringing together expertise from across the business to support risk identification, guide mitigation efforts and ensure consistent implementation of our modern slavery roadmap.



4.2. Our policies

The second pillar of our modern slavery risk management approach is ensuring we implement and maintain meaningful, effective policies. These policies establish consistent, clear standards for employees and suppliers, and provide a clear framework for identifying, managing, and responding to modern slavery risks. Our key policies related to modern slavery are outlined below.

Policy / procedure	Relevance to modern slavery
Procurement Policy	Outlines overarching principles for ethical sourcing and defines our commitment to reducing the risk of modern slavery in our supply chain.
Procurement Procedure	Implements the Procurement Policy by setting out how we assess supply chain risks, conduct due diligence, prioritise ethically aligned suppliers, and respond to identified modern slavery risks.
Business Ethics Guide and Code of Ethics and Conduct	Sets the standard for the integrity we require of our employees, contractors, suppliers and business partners. This is how we maintain trust.
Whistleblower Policy	Facilitates the reporting of potential modern slavery incidents, encouraging employees to disclose information without fear of retaliation.
Risk Management Framework	Provides a consistent, efficient and effective way to manage risk – supported by the Three Lines Model for clear accountability.
Grievance Management and Investigation Procedure	Provides clear guidance on how to raise and resolve concerns and workplace grievances around modern slavery.
Induction Procedure	Outlines the responsibilities of managers, team leaders, and new Transgrid employees and short-term labour hire to enable a smooth and safe transition into the workplace and to ensure organisational compliance with legislation.
Talent Acquisition Recruitment	Sets the overarching principles for ethical recruitment.
Visa Management Procedure	Defines and safeguards the rights of Transgrid's employees, contributing to the prevention of modern slavery by ensuring fair and lawful treatment.
Health and Safety Policy	Sets out our top priority: safety comes first – always. This policy reflects our commitment to zero harm, for our people, visitors, delivery partners and the public, and to continuous improvement.

4.3. Supply chain due diligence

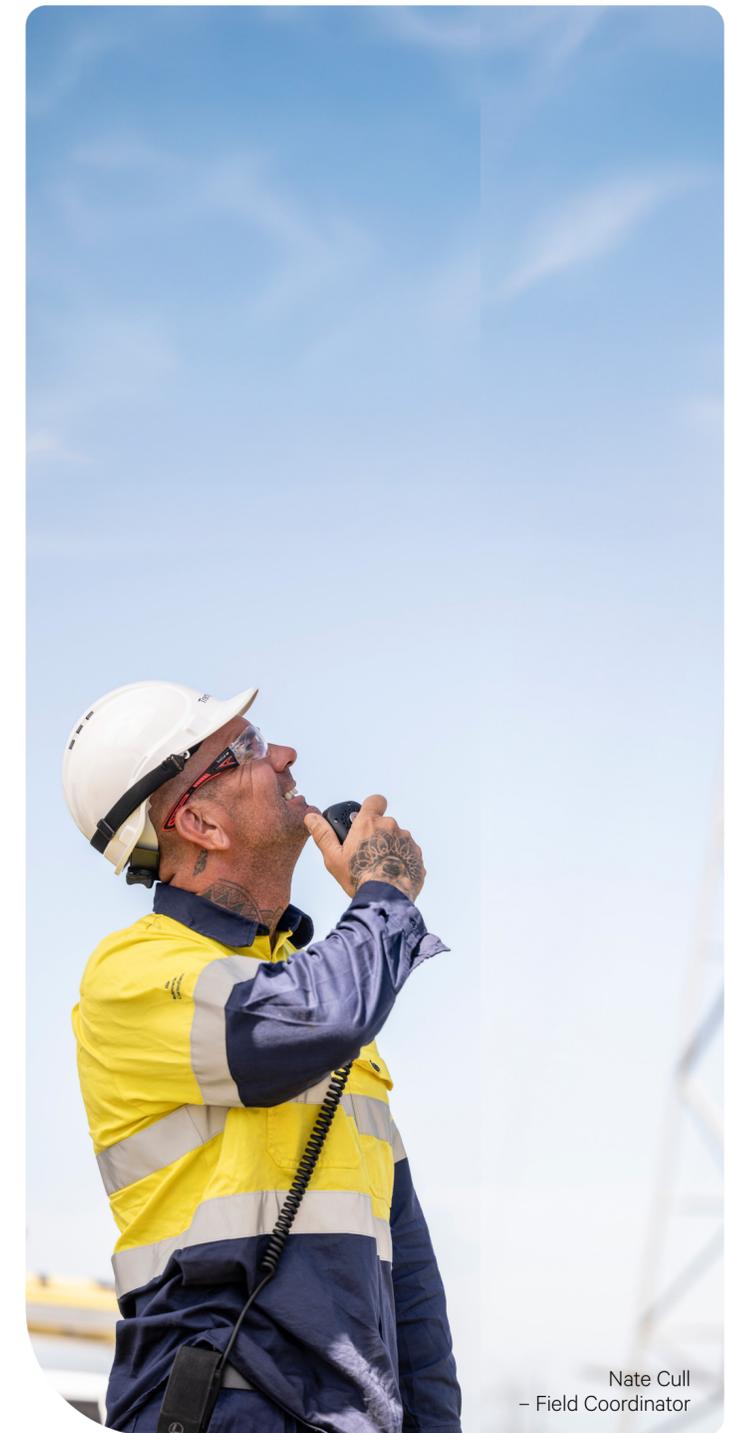
We continue to evolve our due diligence process, which is designed to be both preventive and responsive. We assess modern slavery risks during sourcing activities and monitor suppliers over time, particularly those in our priority risk areas, through annual Self-Assessment Questionnaires (SAQs). This approach helps provide visibility over supplier practices and our ability to respond to emerging risks.

4.3.1. Preventive due diligence: how we monitor our suppliers

We have strengthened our preventive due diligence by rolling out annual SAQs to suppliers in our high-risk areas. We assess suppliers' responses through a detailed review. If any gaps are identified, we engage directly with suppliers to address the findings and co-develop action plans to resolve the issues.

4.3.2. Responsive due diligence: how we assess modern slavery risks in tenders

In FY25, we embedded modern slavery due diligence into our sourcing activities. A pre-screening allows us to identify any high-risk tenders that require a due diligence process through SAQs. Suppliers' responses to the SAQ form part of the tender evaluation, with appropriate weighting. This enables us to identify risks early, reward suppliers that align with our ethical standards, and embed mitigation measures directly into contract terms.



Nate Cull
– Field Coordinator

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4.4. Responsible Recruitment

Recruitment at Transgrid actively supports our commitment to ethical employment practices by embedding risk mitigation strategies throughout the process.

All employees receive written contracts, with about 85% of our direct workforce covered by a Workplace Determination, which outlines their employment conditions, rights and wages. This structured framework supports fair and equitable employment.

We are committed to protecting the human rights of both our employees and contractors, supported by a comprehensive suite of policies and procedures that ensure fair working conditions (see section 4.2). As part of the recruitment process, we conduct identity and right-to-work checks on all new hires. We do not charge recruitment fees under any circumstances.

During onboarding, we ensure all employees complete Modern Slavery awareness training which includes guidance on how to confidentially raise concerns.

At times we engage third-party labour suppliers to support us in sourcing candidates for permanent roles, or to provide temporary workers for short-term fixed assignments. In FY25, we identified that some contracts with our third-party labour suppliers' contracts will be due for renewal in FY26 which provides an opportunity to:

- Update our contractual terms on ethical recruitment and modern slavery;

- Further assure visibility over labour practices and employment conditions; and
- Ensure our recruitment practices are cascaded down to our labour hire suppliers.

4.5. Building capability

Effective risk management relies on well-trained staff across all levels of the organisation. In FY25, Transgrid conducted a review of training and experience and developed a targeted training program to build capability where it matters most.

The program includes:

- Modern Slavery awareness training for all new staff as part of online onboarding.
- Tailored online training for all existing and new procurement staff.

In the coming financial years, we will continue to provide ongoing learning for teams with exposure to potential modern slavery risks, particularly in procurement, and conduct periodical reviews of the content and target audience.

4.6. External collaboration

External collaboration is a key component of our modern slavery strategy, allowing us to stay in touch with evolving industry practices and contribute to the development of more ethical practices in the industry.

Transgrid is a member of the Energy Procurement Supply Association, an industry consortium to facilitate benchmarking and identify industry practices.

Through our partnership with Fair Supply, we have begun to equip our procurement team with solid tools to access supplier-specific modern slavery data. As we integrate these new tools into our ways of working, they will further support decision-making and strengthen the continuous improvement of our modern slavery risk-management processes.

4.7. Grievance mechanism

In FY25, Transgrid has reviewed its grievance mechanism and introduced changes as part of continuous improvement. These include the update of our Grievance Mechanism Policy to explicitly apply to suppliers and include clear references to modern slavery. We have also launched the 'Speak Up' hotline which is a safe, external, independent, and confidential channel for employees, contractors, and suppliers to report concerns, including concerns about modern slavery.

Next year, our efforts will focus on incrementally extending the reach of our grievance mechanism to potential vulnerable workers in our supply chain, ensuring they are aware of their rights and have clear ways to raise concerns.

Reporting Criteria 5:

How the reporting entities assess the effectiveness of these actions

Transgrid is committed to defining and monitoring metrics that help us evaluate the effectiveness of our modern slavery efforts, as outlined in Reporting Criteria 7. The table below details our progress against our past commitments to date and planned efforts to build on each area.

Area	Commitment	Progress
Strategy	Include modern slavery in strategic supplier meetings	In progress The delivery of this item is part of the implementation of our revised Supplier Management Framework.
	Develop modern slavery roadmap	Completed Roadmap to 2028 developed with the Modern Slavery Working Group.
Governance	Embed modern slavery process into overarching procurement process	In progress Embedded into procurement policy and sourcing framework.
	Review effectiveness of grievance mechanism	Completed Changes as part of continuous improvement introduced in updated policy (section 4.7), with three-year roadmap to extend the reach of our grievance mechanism to vulnerable workers in our supply chain.
Capability Building	Implement training requirement	Completed Customised e-learning modules developed for procurement and recruitment teams and awareness training included in onboarding process for all new starters.



Taylor Madden – Substation Technician
Trent Gillespie – Field Coordinator Substation

Reporting Criteria 6:

Process of Consultation

This Statement has been prepared by subject matter experts and overseen by our Modern Slavery Working Group, which engaged with Transgrid's key stakeholders on the reporting requirements under the Modern Slavery Act 2018 (Cth). Throughout the reporting period, the Group consulted Legal, Compliance, Risk, Business Resilience & Protective Security, Corporate & Stakeholder Affairs, Sustainability, People & Culture, Community & Policy and Procurement. Transgrid consulted its Owned and Controlled Entities in developing this Statement.



Joseph Arrowsmith – Substations Technician
Rod Pömfrett – Substation Technician

Reporting Criteria 7: Other Information

At Transgrid, we acknowledge that addressing modern slavery is an ongoing journey. Guided by evolving industry practices, we have identified a range of activities contributing to greater transparency, protecting vulnerable workers and sustaining an ethical and responsible business. We have planned to implement the activities below from FY26.

Area	Future actions
Policy and governance	<ul style="list-style-type: none"> Review the Modern Slavery Working Group structure to ensure clear roles and accountabilities. Develop goals for FY26 and KPIs to track progress and effectiveness. Establish a remedy mechanism for addressing modern slavery incidents. Develop an employee listening strategy.
Data and systems	<ul style="list-style-type: none"> Improve data accuracy and system integration. Develop smart reporting dashboards
Supplier engagement	<ul style="list-style-type: none"> Segment suppliers based on risks. Embed modern slavery in Supplier Management framework. Collaborate with key suppliers to assess risks beyond Tier 1. Work with key construction suppliers to improve access to grievance mechanism. Review of our labour hire contracts to include modern slavery risk mitigation requirements.
Capability	<ul style="list-style-type: none"> Continuous learning for procurement team. Roll out modern slavery training for our recruitment team. Create a modern slavery resource hub on the intranet. Appoint modern slavery champions. Identify third-party auditors and ensure readiness for on-the-ground due diligence.



Rod Pomfrett – Substation Technician

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Contact details

We welcome your feedback

General contact details

Find out more at:

Telephone: 1800 222 537

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You can send a letter to:

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Reply paid 12628 A'Beckett Street, Victoria 8006

Whistleblower details

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