

Modern Slavery Statement

Ausgrid Group FY24



Introduction

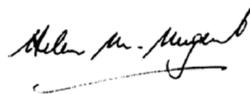
Board approval

This Modern Slavery Statement (**Statement**) is jointly made by the following reporting entities:

1. Ausgrid Operator Partnership (ABN 78 508 211 731) (**Ausgrid**) and its subsidiary, Ausgrid Management Pty Ltd (ACN 615 449 548) (**Ausgrid Management**);
2. Ausgrid Asset Partnership (ABN 48 622 605 040) (**Ausgrid Assets**) and its subsidiary, Ausgrid Finance Pty Ltd (ACN 615 343 005) (**Ausgrid Finance**); and
3. PLUS ES Partnership (ABN 30 179 420 673) (**PLUS ES**),

(together, the **Ausgrid Group** and each an **Ausgrid Group Member**), pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) enacted on 1 January 2019.

This Statement is for the financial year 1 July 2023 to 30 June 2024 (the **reporting period**) and is approved and endorsed by the respective Boards of the Ausgrid Group Members, which are their principal governing bodies.



Dr Helen Nugent AC
Chairman

9 December 2024

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Acknowledgement of Country

The Ausgrid Group acknowledges and pays respect to Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of this land, and for their unique ability to care for Country and deep spiritual connection to it. We honour Elders past, present and future, understanding their knowledge and wisdom ensures continuation of culture and traditional practices.

We acknowledge the contributions of the Ausgrid Group's First Nations employees for sharing their knowledge and experiences, and for their continued work within the organisation to move us towards our future aspirations.

As set out in our **Reconciliation Action Plan**, we want to lead and foster a workforce and approach to our operations that embraces the learnings, voices, cultures, and histories of these Traditional Owners into our organisation.

Artwork designed by Charmaine Mumbulla, a proud Kaurna and Narungga woman. The artwork explores the dynamic relationship of energy sources and pathways on Country for Aboriginal People – sun, lightning, and fire.



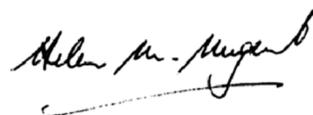
Message from the Chairman and CEO

This 2024 Modern Slavery Statement reflects the Ausgrid Group's ongoing commitment to Human Rights.

We are pleased to share Ausgrid Group's 2024 Modern Slavery Statement. Protecting human rights is a priority issue for the Ausgrid Group. This year, we made good progress in the delivery of our Modern Slavery Roadmap addressing the modern slavery risks associated with our operations and supply chains.

In the last 12 months, we implemented our Human Rights Policy, developed and published our Cobalt Mining and Modern Slavery Position Statement and also delivered our Modern Slavery Remediation Guideline. We rolled out a Modern Slavery Awareness campaign specifically addressing vulnerable workers in our contracted services. We continued to review and update our due diligence approach within our supplier selection processes and successfully trialled Modern Slavery Supplier Deep Dives, to share learnings and reaffirm our expectations with key suppliers. Ausgrid Group's approach to addressing modern slavery continues to evolve and grow.

We understand that our investors, employees, customers, and the community in which we operate expect us to act responsibly while delivering our essential services. We are committed to taking action to ensure that we address and mitigate modern slavery risk in our supply chains and operations.



Dr Helen Nugent AC
Chairman



Marc England
CEO



FY24 KEY ACHIEVEMENTS



Published Ausgrid Group Human Rights Policy

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Completed Modern Slavery Supplier Deep Dive trial

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Published Ausgrid Group Cobalt Mining and Modern Slavery Position Statement

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Delivered Modern Slavery Awareness campaign

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Published Ausgrid Group Modern Slavery Remediation Guideline

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Onboarded new Procurement Strategy and Risk Team

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About this Modern Slavery Statement

The Ausgrid Group is committed to human and labour rights and the global eradication of modern slavery in all its forms.

This Statement records the actions we have taken, and continue to take, to manage modern slavery risks, and how we measure the effectiveness of these actions in eliminating the risk of modern slavery in connection with our business and supply chain.

Mandatory criteria

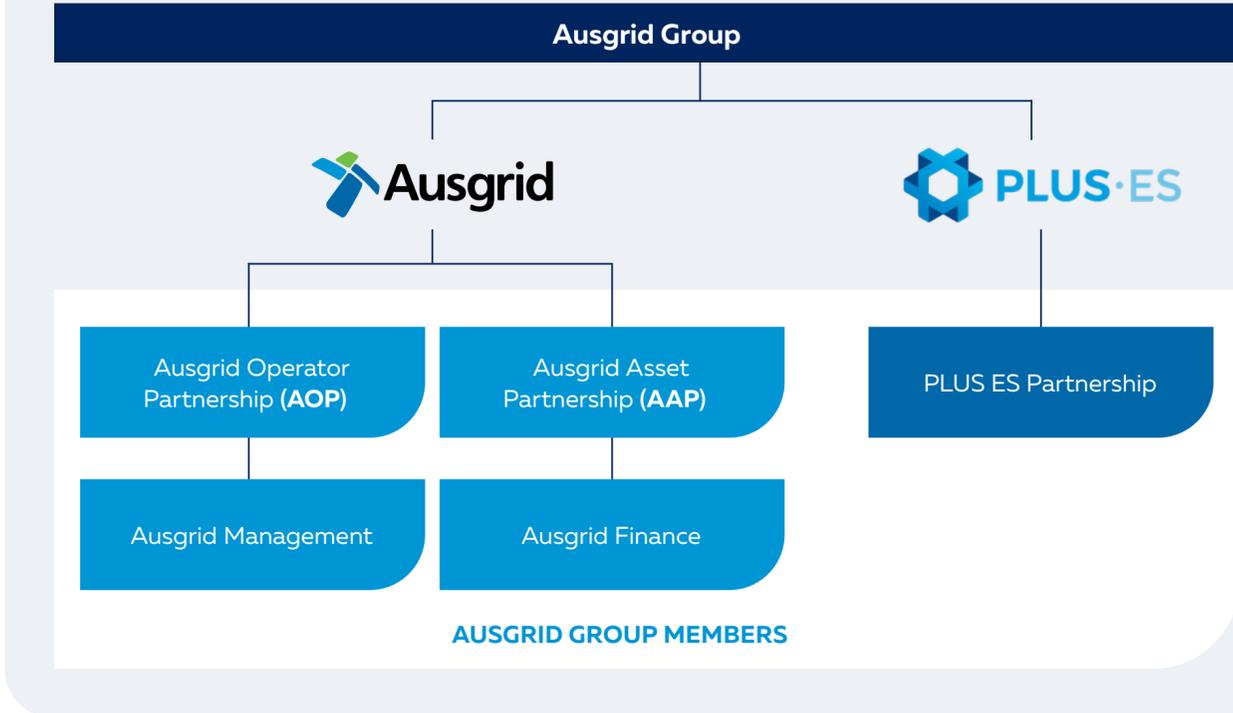
Each Ausgrid Group Member had a consolidated revenue of at least \$100 million during the reporting period and is classified as a reporting entity pursuant to the Act. This Statement has been prepared by addressing the mandatory criteria for content set out in the Act.

The Ausgrid Group applies the Act’s definition of modern slavery. Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include; human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.

MODERN SLAVERY ACT MANDATORY CRITERIA	FY24 AUSGRID GROUP MODERN SLAVERY STATEMENT	PAGE
a Identify the reporting entity	Introduction	1
b Describe the reporting entity’s structure, operations, and supply chains	About this Modern Slavery Statement	3
	About Ausgrid Group	5
c Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	Ausgrid Group operations and risks	11
	Ausgrid Group supply chain risks	14
d 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	Actions taken to actively manage our risks	15
e Describe how the reporting entity assesses the effectiveness of these actions	Measuring effectiveness	21
f Describe the process of consultation with any entities the reporting entity owns or controls	Modern Slavery governance and consultation	4
g Any other information that the reporting entity, or the entity giving the statement, considers relevant	Measuring effectiveness	21
	Seeking assistance	22

SCOPE OF STATEMENT

The Ausgrid Group publishes a combined Modern Slavery Statement (**Statement**) which includes each of the Ausgrid Group entities referred to below:



About this Modern Slavery Statement (continued)

Modern Slavery governance and consultation

The Ausgrid Group applied a cross-functional approach to preparing and drafting this Statement using input from Ausgrid, Ausgrid Assets and PLUS ES stakeholders, including feedback from Procurement, Legal, Sustainability, Organisational Capability and the Executive Leadership Team.

Throughout the year senior stakeholders have provided input and approvals for several key modern slavery related policies, campaigns and guidelines. This collaborative approach has proven very helpful in ensuring the effectiveness of these activities. The following diagram depicts the key aspects of Ausgrid Group's modern slavery governance.

AUSGRID GROUP'S MODERN SLAVERY GOVERNANCE



About Ausgrid Group



OUR PURPOSE, OUR VISION, OUR VALUES

Our purpose

Making electricity accessible for all.

Our vision

Our vision is for our communities to have the power in a resilient, affordable, and sustainable future.

Our values

- Work safe, live safe
- Customer-focused
- Commercially minded
- Collaborative
- Honest and accountable
- Respect

United Nations Sustainable Development Goals (UN SDGs)

The UN SDGs are a core element of Ausgrid Group's sustainability approach. SDG 8: Decent work and economic growth and SDG 10: Reduced inequalities are the two human rights aligned sustainable development goals. In FY24, the Ausgrid Group developed 2030 goals, targets and metrics for our six aligned UN SDGs to show how our business supports these international ambitions. From FY25, we will begin reporting on our progress.

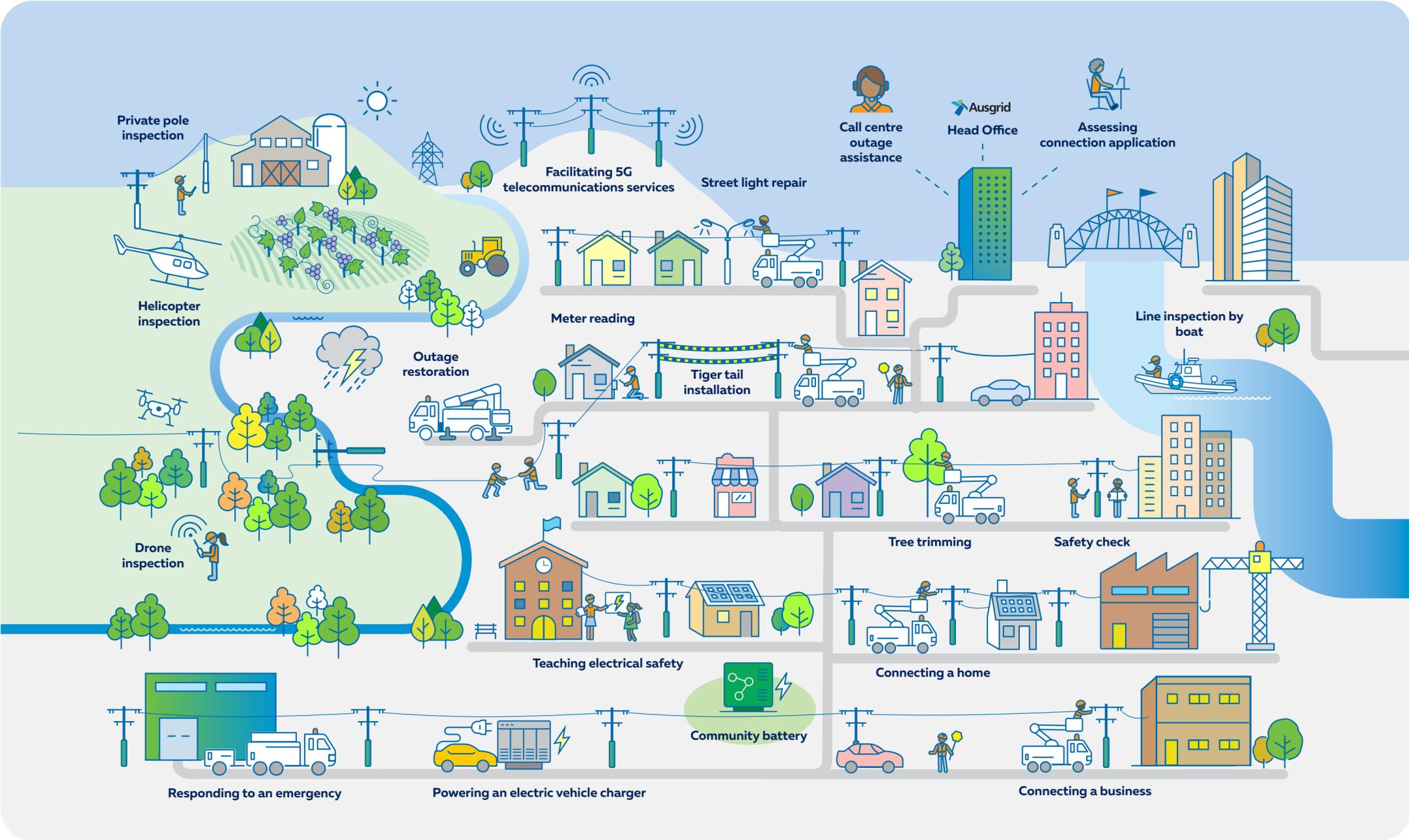
More information about the UN SDGs can be found in our [FY24 Sustainability Report](#).



About Ausgrid Group (continued)

Ausgrid Group's role in the community

This diagram shows some of the wide range of services we provide to our community.



About Ausgrid Group (continued)



Ausgrid

Ausgrid and Ausgrid assets structure

Ausgrid is a partnership carried on under that name by:

- a. Blue Op Partner Pty Ltd (ACN 615 217 500) as trustee for Blue Op Partner Trust;
- b. ERIC Alpha Operator Corporation 1 Pty Ltd (ACN 612 975 096) as trustee for ERIC Alpha Operator Trust 1;
- c. ERIC Alpha Operator Corporation 2 Pty Ltd (ACN 612 975 121) as trustee for ERIC Alpha Operator Trust 2;
- d. ERIC Alpha Operator Corporation 3 Pty Ltd (ACN 612 975 185) as trustee for ERIC Alpha Operator Trust 3; and
- e. ERIC Alpha Operator Corporation 4 Pty Ltd (ACN 612 975 210) as trustee for ERIC Alpha Operator Trust 4.

Ausgrid Assets is a partnership carried on under that name by:

- a. Blue Asset Partner Pty Ltd (ACN 615 217 493) as trustee for Blue Asset Partner Trust;
- b. ERIC Alpha Asset Corporation 1 Pty Ltd (ACN 612 974 044) as trustee for ERIC Alpha Asset Trust 1;
- c. ERIC Alpha Asset Corporation 2 Pty Ltd (ACN 612 975 023) as trustee for ERIC Alpha Asset Trust 2;
- d. ERIC Alpha Asset Corporation 3 Pty Ltd (ACN 612 975 032) as trustee for ERIC Alpha Asset Trust 3; and
- e. ERIC Alpha Asset Corporation 4 Pty Ltd (ACN 612 975 078) as trustee for ERIC Alpha Asset Trust 4.

A consortium comprising IFM Investors, AustralianSuper, and APG Asset Management holds a 50.4% partnership interest in Ausgrid and Ausgrid Assets. The New South Wales (NSW) State Government, through various corporations established in accordance with the Electricity Retained Interest Corporation Act 2015 (NSW), holds a 49.6% partnership interest in Ausgrid and Ausgrid Assets.

Ausgrid Management is a subsidiary of Ausgrid, and Ausgrid Finance is a subsidiary of Ausgrid Assets. Ausgrid and Ausgrid Assets have effective control over their respective subsidiaries.

Within the Ausgrid and Ausgrid asset structures, the Ausgrid Group members hold the following general responsibilities:

- Ausgrid is the primary operating entity and is responsible for operating, maintaining, and building the electricity network and engaging with customers and suppliers for goods and services;
- Ausgrid Assets hold the electricity network assets on behalf of Ausgrid;
- Ausgrid Management is responsible for employing individuals who perform work on behalf of Ausgrid; and
- Ausgrid Finance is responsible for obtaining finance from external lenders on behalf of Ausgrid.



About Ausgrid Group (continued)

Over four million Australians from diverse demographics rely on us daily.

Ausgrid operations

- For over a century, our people have overseen a network of assets that connects communities and empowers customers' lives. We are the largest electricity distributor on Australia's east coast, providing electricity to 1.8 million customers – that means over four million Australians from diverse demographics rely on us daily. These customers encompass households, councils, and businesses. We service critical infrastructure within our network footprint, including schools and hospitals.
- The Ausgrid network comprises substations connected through high and low-voltage power lines, underground cables, tunnels, and power poles, spanning 22,275 square kilometres throughout Sydney, the Central Coast and the Hunter Valley.
- Our people manage diverse operations including infrastructure construction and maintenance, customer connections, street lighting and telecommunications.
- Ausgrid believes it has a key role to play in facilitating the transition to net zero, ensuring the network is ready for further electrification and a future where renewables play an even more significant role in the power mix.
- The Ausgrid head office is in Sydney, NSW.

MAP OF AUSGRID'S NETWORK AREA, WITH INDIGENOUS PLACE NAMES

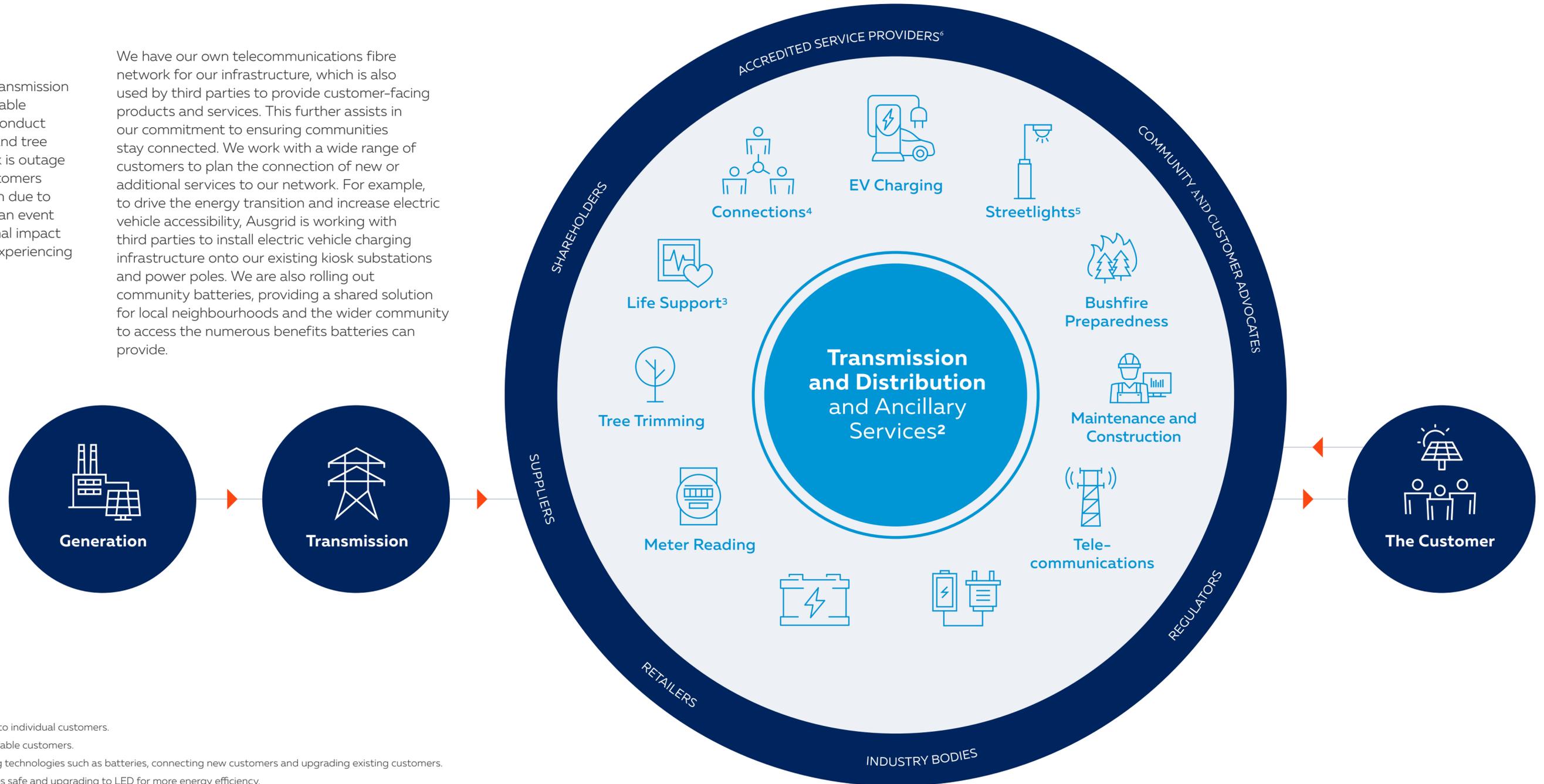


About Ausgrid Group (continued)

Ausgrid value chain

Ausgrid's core business is electricity transmission and distribution. To provide a safe, reliable and resilient network, we continually conduct maintenance, bushfire preparedness and tree trimming. An integral part of this work is outage management and supporting our customers when experiencing a service disruption due to critical maintenance or responding to an event like a storm. We strive to have a minimal impact on our customers, particularly those experiencing vulnerabilities.

We have our own telecommunications fibre network for our infrastructure, which is also used by third parties to provide customer-facing products and services. This further assists in our commitment to ensuring communities stay connected. We work with a wide range of customers to plan the connection of new or additional services to our network. For example, to drive the energy transition and increase electric vehicle accessibility, Ausgrid is working with third parties to install electric vehicle charging infrastructure onto our existing kiosk substations and power poles. We are also rolling out community batteries, providing a shared solution for local neighbourhoods and the wider community to access the numerous benefits batteries can provide.



KEY

- Ausgrid
- Third party

1 Ancillary Services. Non-routine services provided to individual customers.
 2 Life Support. Keeping the power on for our vulnerable customers.
 3 Connections. These include solar panels, emerging technologies such as batteries, connecting new customers and upgrading existing customers.
 4 Streetlights. Maintenance to keep our communities safe and upgrading to LED for more energy efficiency.
 5 Accredited Service Providers. Third parties authorised to work on or near our network on behalf of customers.

About Ausgrid Group (continued)



About PLUS ES

PLUS ES structure

Our structure PLUS ES Partnership (ABN 30 179 420 673), trading as PLUS ES, is a partnership carried on under that name by:

- a. Blue PES Partner Pty Ltd (ACN 622 175 428) as trustee for the Blue PES Partner Trust;
- b. ERIC Alpha AUP Corporation 1 Pty Ltd (ACN 621 524 374) as trustee for ERIC Alpha AUP Trust 1;
- c. ERIC Alpha AUP Corporation 2 Pty Ltd (ACN 621 524 454) as trustee for ERIC Alpha AUP Trust 2;
- d. ERIC Alpha AUP Corporation 3 Pty Ltd (ACN 621 524 525) as trustee for ERIC Alpha AUP Trust 3; and
- e. ERIC Alpha AUP Corporation 4 Pty Ltd (ACN 621 524 605) as trustee for ERIC Alpha AUP Trust 4.

A consortium comprising IFM Investors, AustralianSuper and APG Asset Management Group holds a 50.4% partnership interest in PLUS ES. The NSW State Government, through various corporations established in accordance with the Electricity Retained Interest Corporation Act 2015 (NSW), holds a 49.6% partnership interest in PLUS ES.

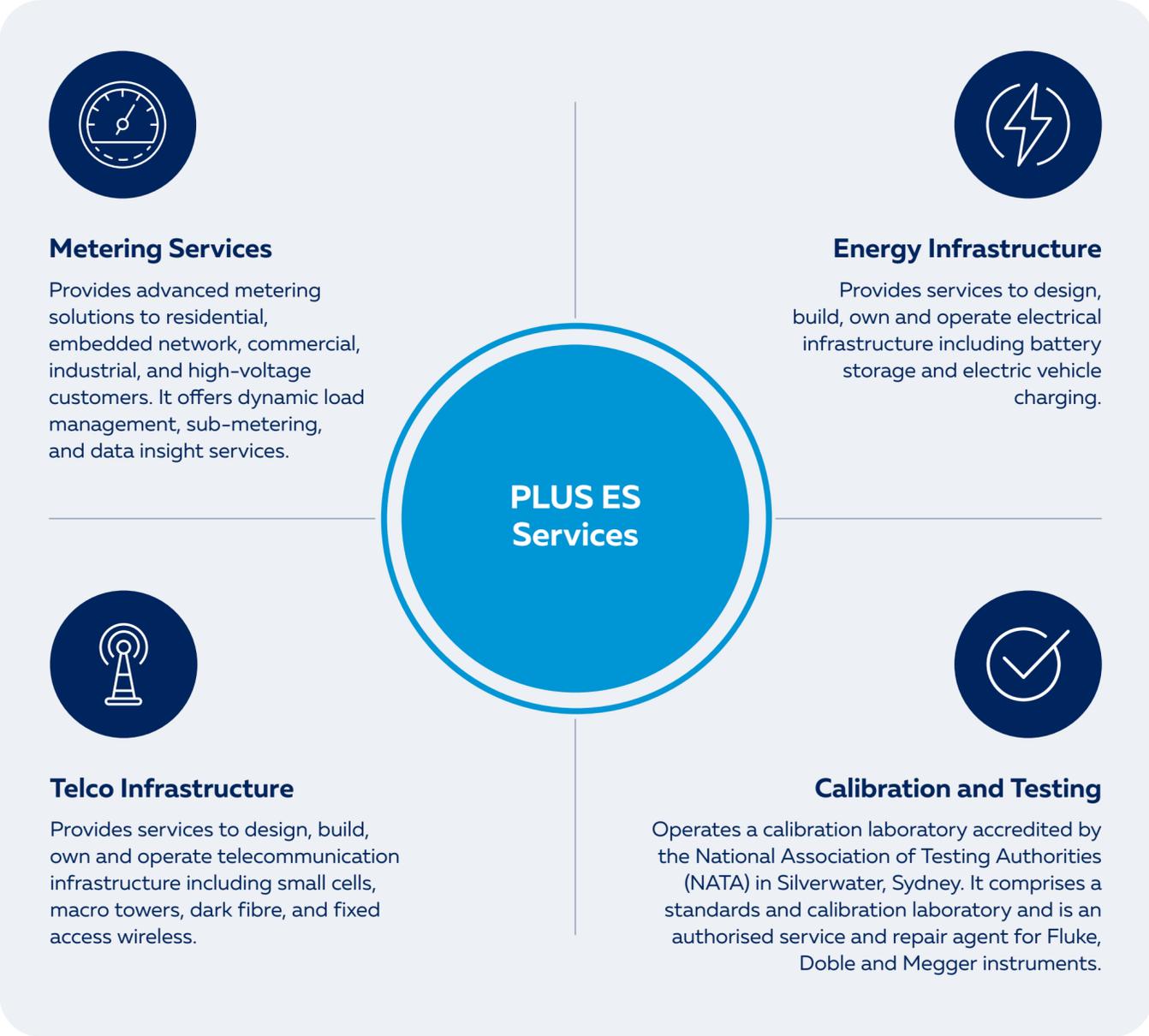
As at 31 July 2024, PLUS ES employs (via its subsidiary, PLUS ES Management 1 Pty Ltd) 72 people on individual contracts. PLUS ES employees are based in New South Wales, Queensland and Victoria, Australia and its head office is in Sydney.

PLUS ES operations

Launched in late 2017, PLUS ES helps businesses in NSW, Queensland, South Australia, Victoria and Tasmania to optimise energy consumption through advanced data delivery and end-to-end energy infrastructure solutions. PLUS ES provides expertise and delivers infrastructure services for contestable metering, telecommunications and energy industries in Australia.

The PLUS ES head office is in Sydney, NSW.

PLUS ES is ring-fenced from the regulated Ausgrid distribution network business.¹



¹ Ring-fencing refers to the separation of the regulated and competitive business activities of an electricity network service provider.

Ausgrid Group operations and risks

AUSGRID GROUP WORKFORCE BREAKDOWN

In FY24 Ausgrid Group had 3,039 employees

566
female

2,457
male

6
other

We are proud that

69%
of our workforce have been with our business for more than 10 years

As well as retaining top talent, we continued to build our workforce with

282
new starters this year, including 19 graduates and 53 apprentices

Our employees are both

field-based
1,239

office-based
1,800

and work across our operations in the following locations:

- Hunter/Central Coast, NSW (1,043)
- Sydney, NSW (1,989)
- other locations (7)

Ausgrid Group employees are free to associate with the unions that represent their sector.

91.6%
of our employees are on the Ausgrid Enterprise Agreement

8.4%
are on individual employment contracts

Contracted services

The risk of modern slavery occurring within the Ausgrid Group workforce is very low. However, the Ausgrid Group does engage workers via contracted service arrangements to provide various services. An assessment of these services highlighted four sectors which have an elevated level of modern slavery risk:

- Security;
- Cleaning;
- Gardening and plant maintenance; and
- Property maintenance.

Workers in these industries are more likely to be vulnerable to the risk of modern slavery due to their employment and visa arrangements, language skills and the unskilled nature of their work. This year the Ausgrid Group implemented several risk mitigation activities with a specific focus to address the modern slavery risk for these workers (see section "Actions to actively manage our risks" for further information).

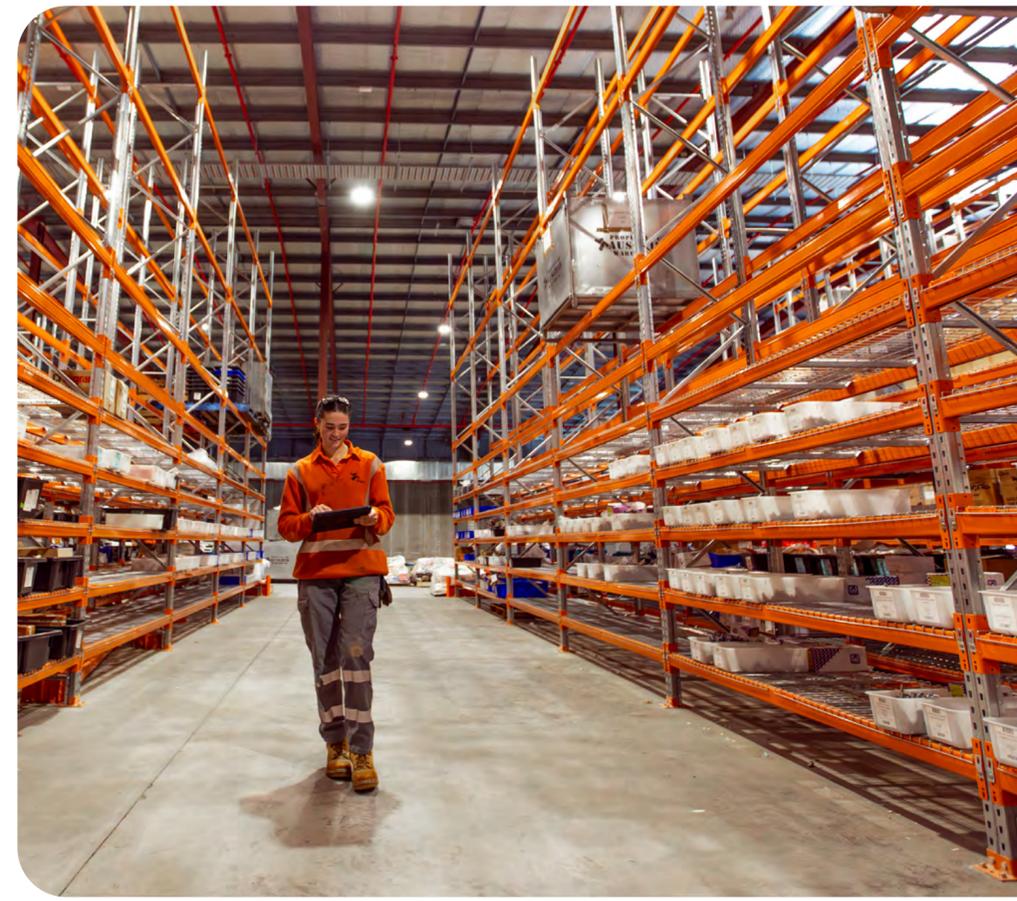


Ausgrid Group supply chain

About Ausgrid Group supply chain key statistics

To support the Ausgrid Group's significant operations, a global supply chain is utilised to provide the components and services required from domestic and international suppliers. The Ausgrid Group's international supply chain covers Europe, North and South America, Asia, and the Middle East. Many procured goods and services have complex supply chains containing multiple suppliers and manufacturers (including from overseas) providing the raw commodities, components, and services to produce the end product or service.

FY24 AUSGRID GROUP PROCUREMENT FOOTPRINT



Ausgrid Group Supply Chain (continued)

Ausgrid Group supply chain map

Ausgrid Group key suppliers of goods and services

The Ausgrid Group modern slavery risk assessment identified three categories (high, medium, low) of country risk across our key suppliers. This analysis will inform our FY25 Modern Slavery Deep Dives with a particular focus on any manufacturing or operations which occur within the high and medium risk locations.

Highest risk

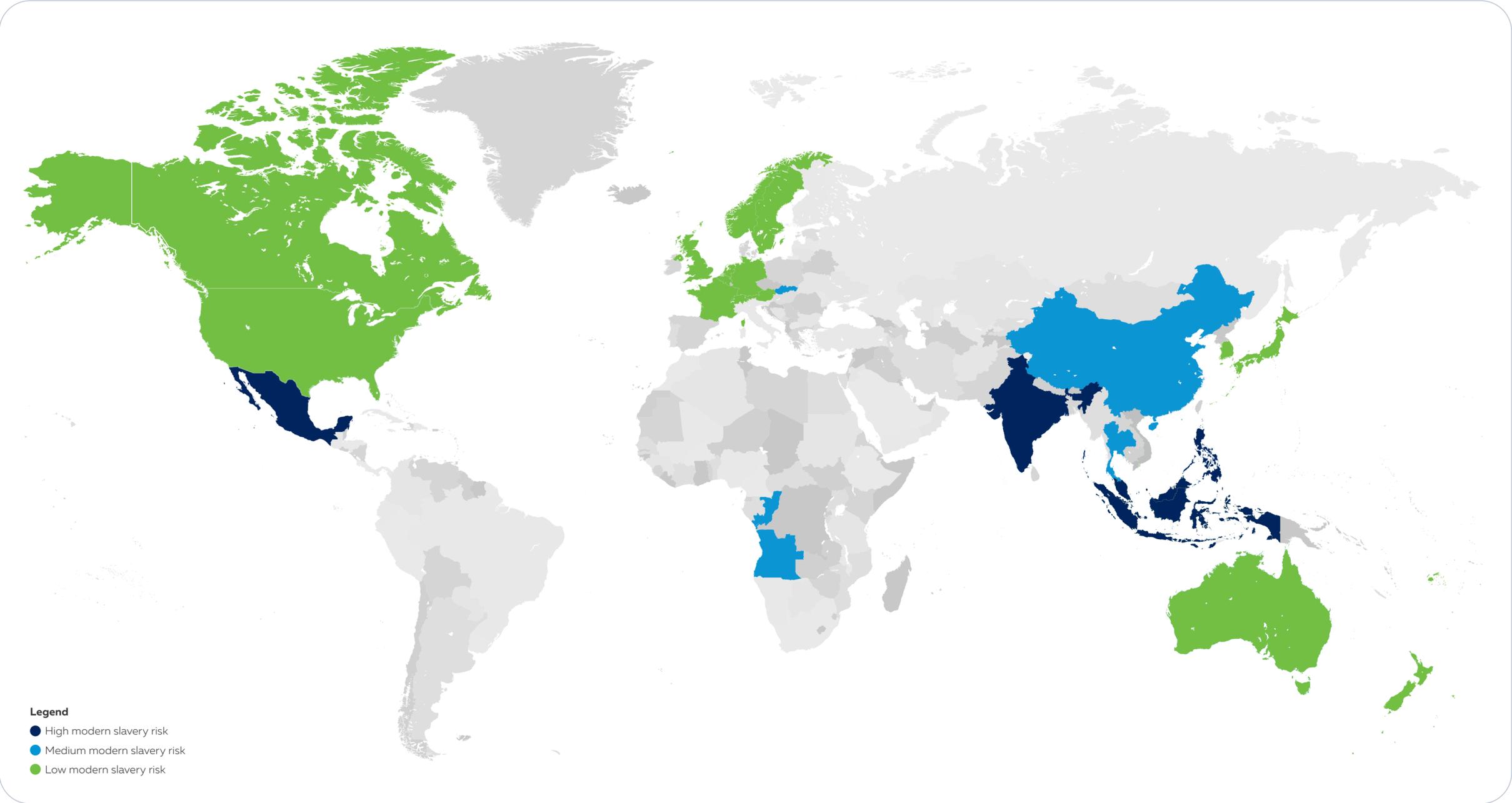
- India
- Philippines
- Indonesia
- Mexico
- Malaysia

Medium risk

- Thailand
- Democratic Republic of the Congo
- Slovakia
- Angola
- China

Low risk

- South Korea
- United States of America
- France
- Singapore
- Austria
- United Kingdom
- Canada
- Australia
- New Zealand
- Japan
- Belgium
- Germany
- Netherlands
- Sweden
- Switzerland
- Norway
- Fiji



Ausgrid Group supply chain risks

Risk assessment methodology

This year the Ausgrid Group applied a three-step risk assessment process:

1. Categorized our key supplier spend using the Global Industry Classification Standard (**GICS**) taxonomy and assessed these industries for modern slavery risk applying the Edge Consulting Modern Slavery Industry rating;
2. Identified countries from which our key suppliers operated and applied the Walk Free Modern Slavery Country Risk rating; and
3. Calculated the total modern slavery risk for each spend category by combining both country and industry risk.

Ausgrid Group supply chain risks

The complex nature of the Ausgrid Group's supply chain means there is a risk that it may be indirectly linked to modern slavery practices. As outlined in the Ausgrid Group Supply Chain section of this Statement, the Ausgrid Group procures 28 categories of goods and services from its key suppliers. It has assessed these categories to determine their level of risk for modern slavery practices. The Ausgrid Group's risk-based assessment identified seven of these 28 categories as 'higher risk'. These are higher risk due to their country of origin and/or the internationally recognised modern slavery risks associated with these categories of goods or services. Identifying these higher-risk areas allows the Ausgrid Group to prioritise and focus its efforts on those areas with the most significant potential for the existence of modern slavery.

THE AUSGRID GROUP'S HIGHER RISK CATEGORIES ARE IDENTIFIED AS:

	Cable & satellite – purchased underground and overhead cables, fittings and accessories from across 13 countries including China, Indonesia, Malaysia, and Thailand.		Construction & engineering – purchased engineering consultancy, construction services, metering and telco services from across 10 countries including China, India and Indonesia.		Data processing & outsourced services – purchased fleet, Business Process Outsourcing (BPO) and Light Detection and Ranging (LiDAR) & Photography services from across 3 countries including India.
	Industrial machinery & supplies & components – purchased equipment hire, industrial and electrical consumables, and switchgear sourced from across 7 countries including China, India, and Malaysia.		IT consulting & other services – purchased IT and Professional services and IT software from across 11 countries including India and the Philippines.		Research & consulting services – purchased professional services and training and development from across 6 countries including India.
			Wireless telecommunication services – purchased mobile services and metering hardware from across 6 countries including the Philippines.		

Actions to actively manage our risks: Policies and procedures

The Ausgrid Group manages its modern slavery risks through a range of policies and procedures. The following policies support our modern slavery governance and provide a platform for continual improvement and engagement with our supply chain, employees and external partners:

POLICY	RELEVANCE TO MODERN SLAVERY	HOW THIS POLICY CONTINUED TO BE IMPLEMENTED DURING THE REPORTING PERIOD
Sustainable Procurement Policy	<p>Sets out the Ausgrid Group’s considerations and accountabilities for sustainable procurement of externally sourced goods and services in a way that has the most positive environmental, social and economic impacts possible over the entire life cycle.</p> <p>At the Ausgrid Group, sustainable procurement balances consideration of the following key criteria within any purchasing decision that is made; including:</p> <ul style="list-style-type: none"> • Social and ethical implications; • The environmental impact of the growth, manufacture and transport of the product or service; • The application of good governance; and • The cost and economic impact of the purchase. <p>To combat the adverse social impacts that result from modern slavery, the policy requires the Ausgrid Group to favour suppliers who support responsible labour practices that contribute to the development of a safe, fair and inclusive workplace including suppliers that comply with the UN Global Compact Principles, including:</p> <ul style="list-style-type: none"> • Freedom of association and the effective recognition of the right to collective bargaining; • Elimination of all forms of forced and compulsory labour; • Effective abolition of child labour; and • Elimination of discrimination in respect of employment and occupation. 	<ul style="list-style-type: none"> • Ausgrid’s Sustainable Procurement Policy guides day-to-day procurement activities conducted across the organisation. • The policy enables the sourcing and purchase of technically conforming goods and services, while achieving the best value for money, minimising risk and ensuring positive outcomes for the environment and the community.
External Partner Code of Conduct	<p>Communicates the Ausgrid Group’s expectations to our external partners and their supply chains in providing goods and services. It explicitly requires them to identify and mitigate risks and eliminate any forms of modern slavery.</p>	<ul style="list-style-type: none"> • All new suppliers are provided with this Code and are requested to provide it to their sub-contractors. • New supplier assessments require mandatory adherence to this Code.
Code of Conduct	<p>Our Code of Conduct describes how all our workers are responsible for their own behaviour and are expected to conduct themselves including:</p> <ul style="list-style-type: none"> • Complying with the law (in this case the Criminal Code 1995 (Cth) and various international agreements which relate to modern slavery); • Complying with the Ausgrid Group’s policies, procedures, rules, and guidelines; • Maintaining a safe work environment; and • Reporting serious concerns (in this case concerns relating to suspected or actual modern slavery instances). 	<ul style="list-style-type: none"> • This policy was refreshed in February 2024. • All employees must complete Code of Conduct training on an annual basis. • Employee performance appraisals include assessment against criteria within this Code.
Forced Labour and Debt Bondage Position Statement	<p>Sets out the Ausgrid Group’s approach to addressing forced labour and debt bondage.</p>	<ul style="list-style-type: none"> • This year this policy was sent to our key suppliers requesting they familiarise themselves and ensure their sub-contractors are made aware.
Whistleblower Policy	<p>Sets out the Ausgrid Group’s commitment to implement a whistleblower protection program to help detect corrupt, illegal, or other matters of misconduct. In this case concerns relating to suspected or actual modern slavery instances.</p>	<ul style="list-style-type: none"> • This policy was refreshed in June 2024. • A whistleblower awareness campaign specific to modern slavery was (and continues) to be rolled out across our operations.

FY24 HIGHLIGHTS

Human Rights Policy

The Ausgrid Group published a Human Rights Policy which outlines Ausgrid’s commitment to respecting and supporting human rights across our operations and supply chain, and our expectations about how we conduct ourselves and make decisions to support this commitment. The policy applies to all employees, business partners, consultants, contractors, suppliers, and any person undertaking work for the Ausgrid Group. This policy was sent to our key suppliers requesting they familiarise themselves and ensure their sub-contractors are made aware. It was also communicated across the Ausgrid Group.

Cobalt Mining and Modern Slavery Position Statement

The Ausgrid Group published a Cobalt Mining and Modern Slavery Position Statement which sets out Ausgrid Group’s approach to the procurement of goods containing cobalt, specifically batteries. The adverse impacts of cobalt mining are an issue of concern to us. The Ausgrid Group uses Li-ion batteries in technology (portable electronic equipment), fleet (electric vehicles) and the network (community and pole mounted batteries). This policy was published in June 2024 both internally and externally. The Ausgrid Group will monitor battery technology development for cobalt free options. The ongoing development of Ausgrid’s battery program will be based on cobalt free chemistries. Additionally, we will include our battery suppliers in our FY25 Deep Dive program.

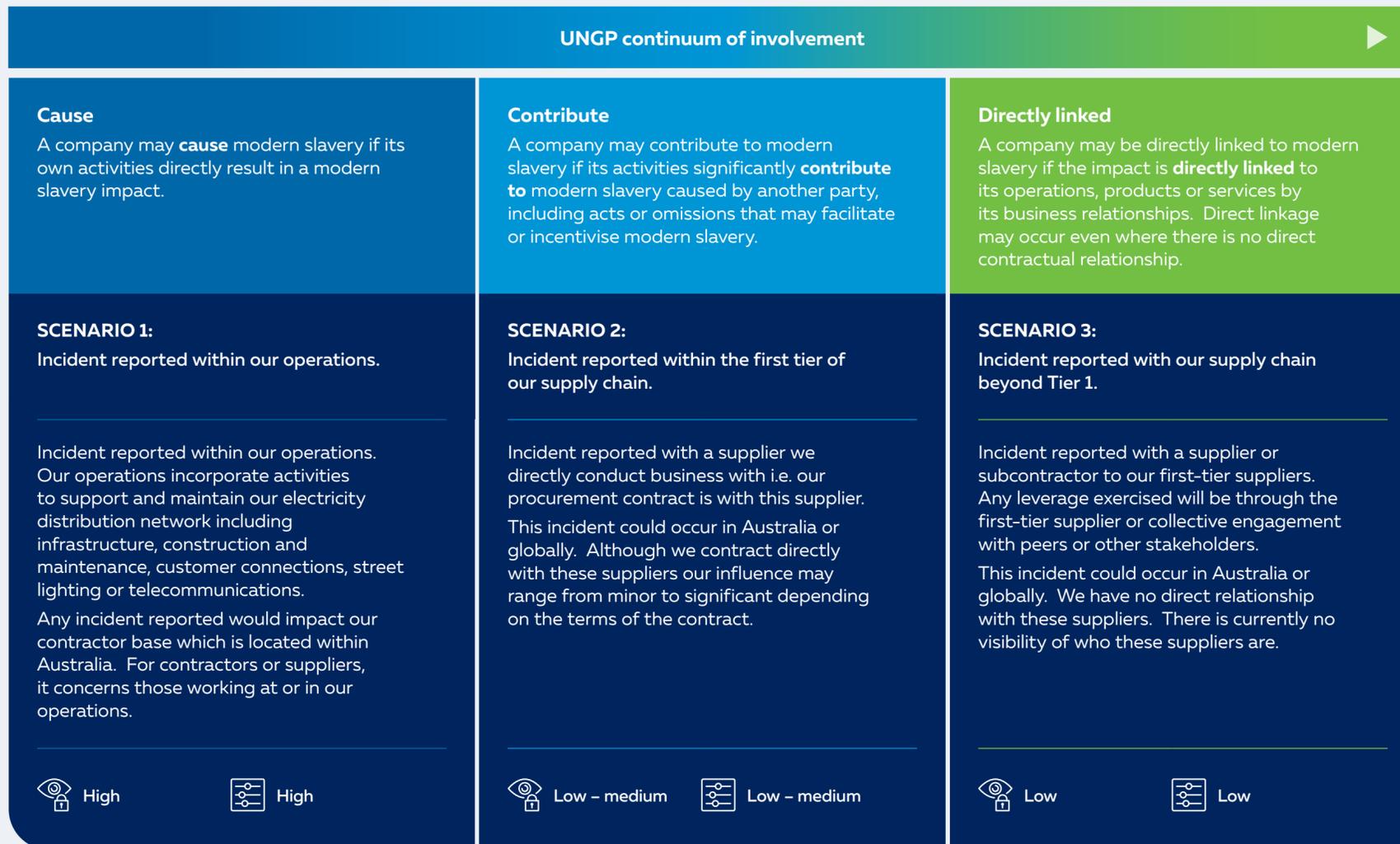
Ausgrid Group Modern Slavery Remediation Guideline

The Ausgrid Group Modern Slavery Remediation Guideline (**Guideline**) will ensure remediation for an individual (the **Complainant**) when we identify or become aware of an actual incident (including claims) of modern slavery in our business, supply chain and/or their operations. This guideline is to be used by any employee responding to an incident or claim of modern slavery and is based on three scenarios:

1. Incident reported within our operations;
2. Incident reported within the first tier of our supply chain; and
3. Incident reported with our supply chain beyond Tier 1.

The scenarios align with the United Nations Guiding Principles (**UNGP**) continuum of involvement. Each scenario has a different pathway to resolution. This diagram illustrates three scenarios mapped against the UNGP continuum of involvement. It demonstrates the sliding scale nature of Ausgrid Group’s influence and control depending on the degree to which we directly or indirectly cause an incident.

The Guideline applies a key principle **that complainant safety is the priority**. Attention to the physical and psychological safety of the complainant is to be factored into all actions undertaken. Modern slavery is a complex and sensitive issue. How we respond will depend on a range of factors and circumstances however complainant safety and their desired outcome will be central to all actions taken and decisions made.



Visibility and access
 Influence and control

Actions to actively manage our risks: Due diligence

The Ausgrid Group manages modern slavery risk in accordance with our Risk Management Framework. We believe effective risk management generates trust and respect from our key stakeholders and customers by encouraging a culture of education, awareness and continual improvement.

In addressing modern slavery risk within our supply chain, we conducted risk-based assessments to identify our priority risk areas which informed our mitigation approach and next steps for improvement. We proactively engaged with our suppliers and business partners, collaborated with our industry peers, and actively investigated areas of concern.

DUE DILIGENCE PROCESS	RELEVANCE TO MODERN SLAVERY	
Enterprise Risk Assessment	The Ausgrid Group develops and maintains Enterprise, Group and Functional risk profiles through a review of its strategic priorities (top-down) and an aggregation of functional, operational, project and hazard-based risks (bottom-up). Modern slavery has been identified as a key Ausgrid Group risk relating to procurement and its supply chain.	HOW THIS PROCESS CONTINUED TO BE IMPLEMENTED DURING THE REPORTING PERIOD Enterprise, Group and Functional risk profiles are reviewed quarterly by Executive Leadership Team risk sponsors and the Ausgrid Group's Audit, Risk & Compliance team, with a particular focus on any material changes to risk ratings and progress against agreed risk treatment plans.
Industry Collaboration	Modern slavery briefings led by industry experts provide modern slavery knowledge on local and international best practice and proposed legislative changes.	This year the Ausgrid Group attended briefings by the Australian Attorney Generals Department, Pillar Two and Better Sydney.
Supplier Tender Assessment	The Ausgrid Group's procurement processes ensure the selection of capable and reliable suppliers that meet the requirements of our specifications. These specifications include the supplier's ability to manage business and modern slavery risk, e.g. do suppliers have an Employee Code of Conduct, Ethical Sourcing or Modern Slavery policy / process and Employee Grievance policy / process. When tendering, these requirements are articulated through Respondent Schedules, the responses to which form part of the tender evaluation.	All new suppliers operating in industries or geographic locations deemed high risk were assessed against modern slavery tender criteria.

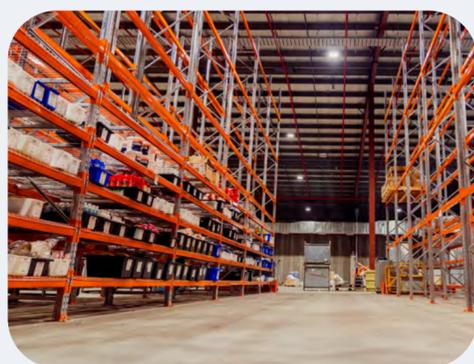


Actions to actively manage our risks: Due diligence (continued)

FY24 HIGHLIGHTS

Procurement Strategy and Risk Team

This year Ausgrid enhanced its procurement and supply chain risk management with the onboarding of a team dedicated to the expansion of our procurement and supply chain management systems, policies, processes and data. This accelerated supply chain management activity will support the delivery of the Modern Slavery Roadmap.



Modern Slavery Supplier Deep Dives

To understand our supply chain modern slavery risk in more detail we trialled Modern Slavery Supplier Deep Dives (Deep Dives). The Deep Dives were a two-step process. First, a supplier desktop risk assessment was conducted reviewing the publicly available information on the supplier’s modern slavery activities. Secondly, we met with the supplier to discuss the shared challenge of addressing modern slavery risk. These conversations were collaborative and friendly, providing a platform to describe our modern slavery risk management activities – both planned and completed – in a far more personal way. Likewise, the Ausgrid Group was able to actively listen and learn from the experiences of its supply partners. In some cases, recommendations were made to improve modern slavery outcomes. Based on the success of these four Deep Dives Ausgrid will expand this activity in FY25.

Modern slavery whistleblower poster campaign

The modern slavery risk assessment of our workforce identified several categories of contracted services workers as being at risk of modern slavery. To address this risk, posters communicating the Ausgrid Whistleblower phone number were hung in high traffic areas such as break rooms and cleaning storerooms. These posters included foreign language translations so culturally, and linguistically diverse workers can understand the messaging. Ausgrid will continue this engagement campaign in FY25 to reinforce the messaging for this workforce.

Modern Slavery is real and exists in Australia.



In Australia human trafficking, forced labour, servitude and debt bondage are illegal.

Help is available.

If you are being exploited or witness someone else being exploited at work call the **Ausgrid Whistleblower service on 1800 607 206 (free call).**

- Arabic** العبودية الحديثة تحدث في أستراليا إذا تعرضت أنت أو أي شخص تعرفه للاستغلال، فالمساعدة متاحة اتصل بالرقم 1800 607 206.
- Hindi** ऑस्ट्रेलिया में आधुनिक गुलामी प्रचलित है. अगर आपका या आपके किसी जान-पहचान वाले का शोषण हो रहा है, तो सहायता उपलब्ध है। 1800 607 206 पर फोन करें या.
- Tagalog** Ang makabagong pang-aalipin ay nangyayari sa Australya. Kung ikaw o isang taong kilala mo ay sinasamantala, may tulong na makukuha. Tumawag sa 1800 607 206.
- Chinese** 澳大利亚存在现代奴隶行为。如果你身边存在劳动力剥削现象，可以致电1800 607 206寻求帮助。
- Indonesian** Perbudakan modern bisa terjadi di Australia. Apabila Anda mengalami eksploitasi atau mengetahui orang yang dieksploitasi, bantuan tersedia. Silakan hubungi 1800 607 206.
- Malay** Perhambaan moden berlaku di Australia. Jika anda atau seseorang yang anda kenali sedang dieksploitasi, bantuan boleh didapati. Hubungi 1800 607 206.

Case study

If a modern slavery incident is reported within our operations

The below outlines the Ausgrid Group Modern Slavery Remediation Guideline process if someone reports a modern slavery incident has occurred with a contract service worker within our operations.

Step 1

Assess the report

Confirm the grievance is a Modern Slavery issue.

Step 2

Conduct an initial risk assessment

Conduct an initial risk and safety assessment considering the Complainant's vulnerabilities.

Identify the Complainant's employer and what Ausgrid Group's relationship is with that employer.

If appropriate, advise that supplier of the reported incident and request a Supplier Representative work with us to address the concern.

Step 3

Establish an investigative team

Establish working group of specialists from the following:

- Sustainability Team;
- Procurement Team;
- People Team;
- Legal Team;
- Head of Security;
- Internal Risk and Compliance Team;
- Local experts; and/or
- Supplier Representative(s) where appropriate and available.

Step 4

Preliminary investigation

Capture evidence about the incident, using an independent organisation where necessary and possible.

Identify if there are additional victims of modern slavery because of this situation.

Identify if this is a one-off incident versus systemic issue.

Ascertain what remediation the Complainant is looking for.

Investigate what relevant third-party remediation services or other recognised remediation authorities are available and could be useful.

Step 5

Remediation Plan

Agree a Remediation Plan for the Complainant

Where appropriate the supplier will have ownership and responsibility in implementing the Remediation Plan.

At all times the Complainant's circumstances and wishes must be taken into consideration.

Step 6

Supplier Improvement Plan

Work in partnership with the supplier to:

- Identify and understand the circumstances which created the adverse impacts;
- Identify solutions to eliminate the adverse impacts reoccurring; and
- Implement the agreed solutions.

These actions will be documented in a Supplier Improvement Plan, which will be agreed by both us and the supplier.

Delivery of a Remediation Plan will be included in the Supplier Improvement Plan.

Step 7

Monitor and measure

To the extent possible and as appropriate, provide ongoing monitoring and support to the Complainant. The investigative team will identify the most appropriate person to be responsible for this.

Ensure our point of contact remains available to the Complainant until the Remediation Plan outcomes have been delivered

Complainant is provided access to appropriate support as needed and as possible at all stages of the process.

Actions to actively manage our risks: Continuous improvement and training

The Ausgrid Group's focus is to improve our management of modern slavery risks, implement these into our business practices, provide relevant information and raise awareness with our employees and external partners. The Ausgrid Group provides several training modules that educate our people on our obligations to manage modern slavery risks:



TRAINING	RELEVANCE TO MODERN SLAVERY	FY24 RATE OF COMPLETION
Modern Slavery Introduction training module	This 30-minute training provides detailed information on what modern slavery is and how it applies to our supply chain and operations. It is compulsory to all new employees.	85%
Code of Conduct training	This training includes information on our Whistleblower program and must be completed annually by all employees.	98 %
Procurement Awareness training	This training includes information on our External Code of Conduct and modern slavery obligations. It must be completed by all new employees who have procurement function responsibilities.	98 %

FY24 HIGHLIGHTS

Training and awareness programs

To ensure our most at risk workers (those employed via contracted service arrangements providing services such as cleaning) understand modern slavery and their rights, the compulsory onboarding training all contractors must undertake prior to working on site has been updated. This training module now includes information on what modern slavery is, what it looks like and who to call to report any concerns (the Ausgrid Group's Whistleblower program). Additionally a simple three-minute animation was produced to explain what modern slavery is, what it might look like in a work context and who to call to report any concerns. This animation was (and will continue to be) used across the business to raise awareness of modern slavery with our workers and suppliers and encourage them to report any concerns.

Procurement Town Hall modern slavery briefing

This year the Ausgrid Group procurement function centralised under the Ausgrid Group Head of Procurement. To commemorate the team forming a Town Hall was conducted with modern slavery as a key agenda item. This session emphasised the important role procurement plays in managing modern slavery risks and was an opportunity to refresh our knowledge as a team.

Measuring effectiveness

The Ausgrid Group is committed to measuring the effectiveness of our modern slavery risk mitigation actions. We measure the effectiveness of our modern slavery response based on the following:

Internal engagement and feedback

A key indicator of effectiveness is the frequency, quality and depth of collaboration within the Ausgrid Group on the topic of modern slavery. This year engagement across the Ausgrid Group was evidenced through inter-departmental collaboration to develop policies and procedures, multi-stakeholder review of modern slavery clauses in contracts and tenders, modern slavery risk review of our operations, and the development of various training programs with the support of organisational capability and the communications team. These engagements increased the organisational knowledge of modern slavery and elevated the profile of modern slavery as an issue to be proactively considered and addressed.

External engagement

A key indicator of effectiveness is Ausgrid's knowledge currency. This year the Ausgrid Group attended several modern slavery briefings led by industry experts, for example the Australian Attorney Generals Department, Pillar Two and Better Sydney. Attendance at these briefings ensure we are up to date on local and international best practice, understand proposed legislative changes and engage with our peers.

Review of procedure and processes

A key indicator of effectiveness is the currency of our procedures and processes. This year the Whistleblower Policy and Employee Code of Conduct were updated and republished.

Delivery of Modern Slavery Roadmap

A key indicator of effectiveness is Ausgrid Group's commitment to deliver on its Modern Slavery Roadmap. This year a dedicated working group has delivered the Human Rights Policy, Modern Slavery Remediation Guideline, Cobalt Mining and Modern Slavery Position Statement and Modern Slavery Awareness training. We are committed to continue delivering on our Modern Slavery Roadmap commitments.

Training compliance

A key indicator of effectiveness is the number of employees completing mandatory training. The Ausgrid Group have an overall 95% compliance across all its modern slavery related training.

Supplier engagement

A key indicator of effectiveness is the quality of the responses we receive from our external partners on how they are managing modern slavery risks, self-reporting of any identified or suspected modern slavery issue and the quality of such reporting.

Other information about this Statement

For the purposes of the Act and this Statement, modern slavery means conduct which would constitute:

- a. an offence under Division 270 or 271 of the Criminal Code; or
- b. an offence under either of those Divisions if the conduct took place in Australia; or
- c. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Seeking assistance

If you have concerns about modern slavery or broader human rights issues relating to Ausgrid Group's supply chain or operations, you can contact us using our Whistleblower hotlines and can choose to remain anonymous.

Individuals covered by the Whistleblower Policy will be protected against detriment or threats of detriment. Whistleblower disclosures must be made as set out below:

For Ausgrid matters

24/7 reporting at www.yourcall.com.au/report (enter "AUSGRID" as org. ID)

Your Call hotline number: **1800 607 206**

Email: ausgrid@yourcall.com.au

Mail: Locked Mail Bag 7777, Malvern VIC 3144

For PLUS ES matters

24/7 reporting at www.yourcall.com.au/report (enter "PLUSES" as org. ID)

Your Call hotline number: **1800 607 197**

Email: pluses@yourcall.com.au

Mail: Locked Mail Bag 7777, Malvern VIC 3144





www.ausgrid.com.au

General enquiries 13 13 65
(9.00am to 4.30pm Monday to Friday)

enquiries@ausgrid.com.au

GPO Box 4009
Sydney NSW 2001
Australia

ABN: 78 508 211 731



www.pluses.com.au

General enquiries 1300 760 626
(8.00am to 5.00pm Monday to Friday)

info@plusES.com.au

Level 14, 24 Campbell Street
Sydney NSW 2000
Australia

ABN: 30 179 420 673

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