Modern Slavery Statement

Statement for 2023



ENERVEN

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Disclaimer

The information contained in this report is relevant and accurate to 31 December 2023. This report and the information contained in this report is for general information only and should not be taken read or relied upon as anything other than general information. All references to SA Power Networks Group refers to our two key businesses:

- SA Power Networks, which manages the regulated electricity distribution network serving 1.7 million South Australians, and
- Enerven, a specialist service provider in the competitive energy and telecommunications sectors.

Foreword

This is the SA Power Networks Group's fourth Modern Slavery Statement – it is an important statement of our 2023 progress on our commitment to responsible business practices which consider the impact to human rights in our organisational decision making.

These business practices have seen the integration of Responsible Supply Chain commitments in our Sustainability Strategy including, recognising the importance of understanding human rights risks in our supplier engagements.

With turbulence in global supply chains, we are conscious of the extent of our influence and the challenges in balancing our objectives in meeting the needs of our customers and community and meeting our anti-slavery objectives.

The State Government has committed to capitalising on the global green energy transition, and the Federal Government, through the Department of Climate Change, Energy, the Environment and Water, has expanded the Capacity Investment Scheme for clean energy projects to meet the pledged 82% renewable energy target and firm the energy grid. Achieving

a just energy transition, which nurtures human rights, is a national issue, and collaboration is essential. We must all do our bit.

SA Power Networks Group's Strategic Direction sets out our long-term ambitions for 2035, with our vision being to "Lead the transformation of energy services for a sustainable future". As we take a leading role in supporting the community towards decarbonisation and its multitude of social and economic benefits, our Responsible Supply Chain is a supporting pillar.

We are committed to working with suppliers who share our commitment and collaborating with industry to share good practice knowledge and practices which ensure a just and fair energy transition.



Andrew Bills, CEO



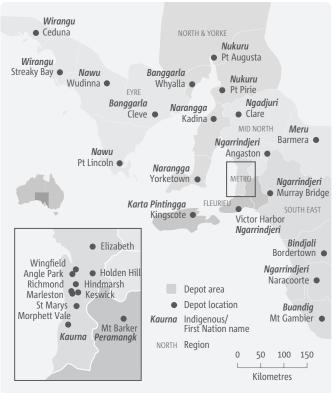
Peter Tulloch, Chairman

Acknowledgement of Country

In the spirit of reconciliation, SA Power Networks and Enerven acknowledge the multiple Traditional Owners of the lands that host the South Australian electricity network and their connections to land, sea and community. We would also like to pay our respects to Elders past and present and acknowledge that these are living cultures.



The visual centrepiece of our first Reconciliation Action Plan is *Empowering South Australia*, by Presten Warren, an artist and proud Wirangu/Dieri/Kokatha/Mirning man.



Criteria 1 – Identify the reporting entity

Identification of the reporting entity

This statement has been prepared and published in accordance with the *Modern Slavery Act 2018 (Cth)* (The Act) for the calendar year ended 31 December 2023 (CY23).

It covers the activities of the reporting entity SA Power Networks (ABN 13 332 330 749) and entities owned and controlled by SA Power Networks:

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

SA Power Networks (ABN 13 332 330 749) is a partnership comprising:

- CKI Utilities Development Ltd (ABN 65 090 718 880)
- PAI Utilities Development Ltd (ABN 82 090 718 951)
- Spark Infrastructure SA (No 1) Pty Ltd (ABN 54 091 142 380)
- Spark Infrastructure SA (No 2) Pty Ltd (ABN 19 091 143 038)
- Spark Infrastructure SA (No 3) Pty Ltd (ABN 50 091 142 362)

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



Criteria 2 – Structure, operations and supply chains

Organisational Profile

The SA Power Networks Group has two key businesses – SA Power Networks, which manages the regulated electricity distribution network serving South Australia, and Enerven, a specialist service provider in the competitive energy and telecommunications sectors.







ENERVEN

SA Power Networks – Regulated business

SA Power Networks' core business is safe, reliable and efficient electricity delivery, but our network also plays a vital role as South Australia transitions to a distributed and decarbonised energy system. A network that once served only to supply energy generated by large, centralised fossil-fuelled generators, now hosts more than half of the State's generation capacity, with much of it owned by customers. Managing the distribution network now involves not just managing supply for 900,000 customers with their diverse energy demand needs, but also managing their desire to contribute cheap and green energy into the grid from hundreds of thousands of consumer energy resources (CER) such as solar panels, batteries and electric vehicles. Over the longer term, our network will enable broader decarbonisation through electrification of transport and potentially other end-use applications currently powered by hydrocarbons.

Enerven – Unregulated business

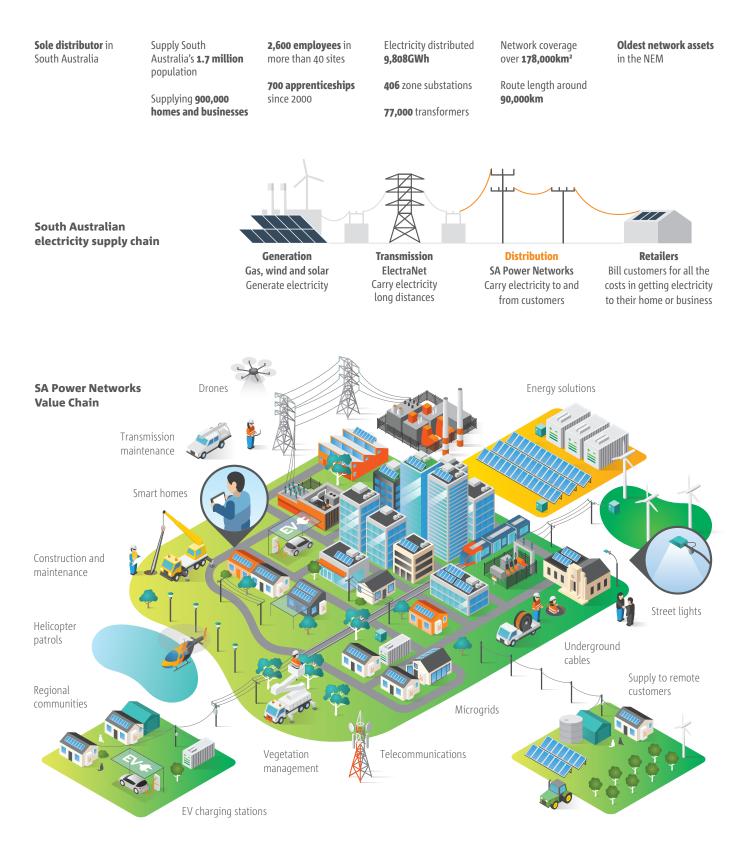
Enerven specialises in the design, construction and maintenance of electrical, renewable, and telecommunications infrastructure. Enerven provides a range of services to utility, industrial and commercial enterprises, with experience in renewable energy technologies including solar farms, battery energy storage systems (BESS), smart lighting, Virtual Power Plants (VPP), embedded networks and microgrids.

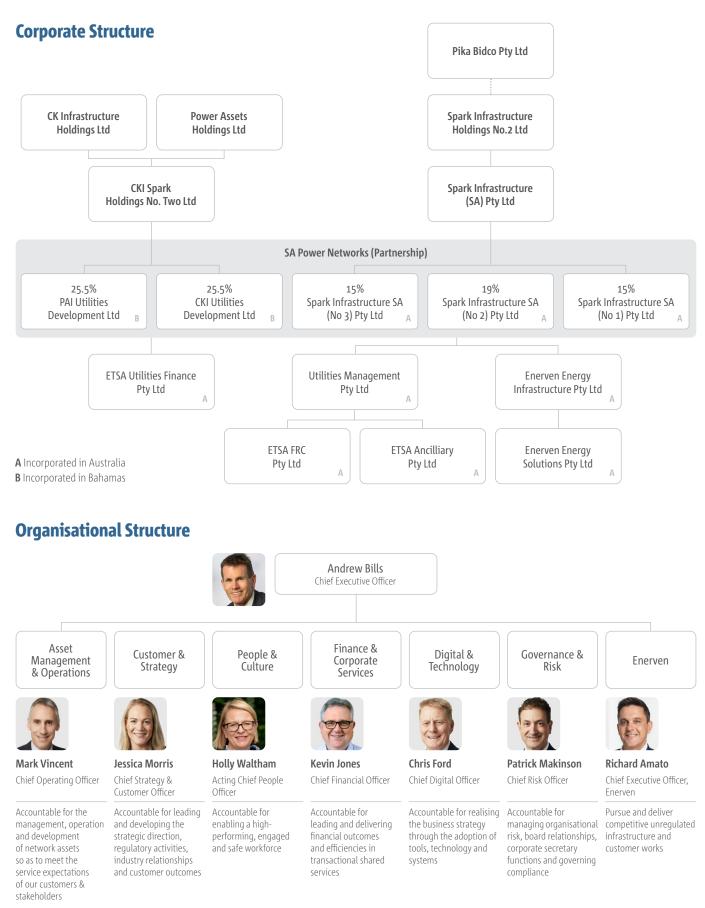
The key services provided by Enerven include:

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

Structure, operations and supply chains

About the SA Power Networks Group





This diagram represents the organisational structure as at February 2024.

Structure, operations and supply chains

Operations

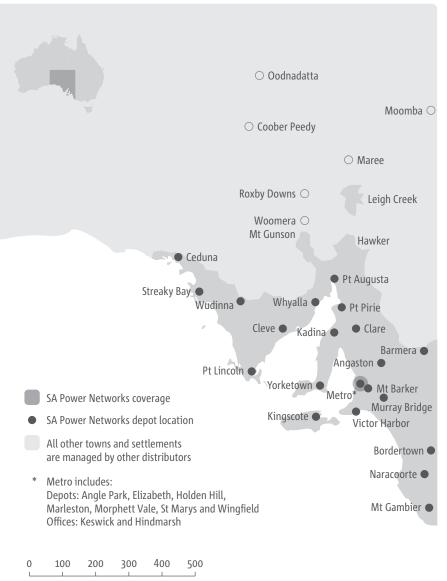
Our priority is to keep the lights on for the people of South Australia.

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

The electricity distribution network in South Australia covers roughly 178,000 sq km, with a network route length of 90,000km. We supply electricity to approximately 900,000 customers ranging from regional and metropolitan residential homes and businesses to industry precincts and isolated farms in rural areas.

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

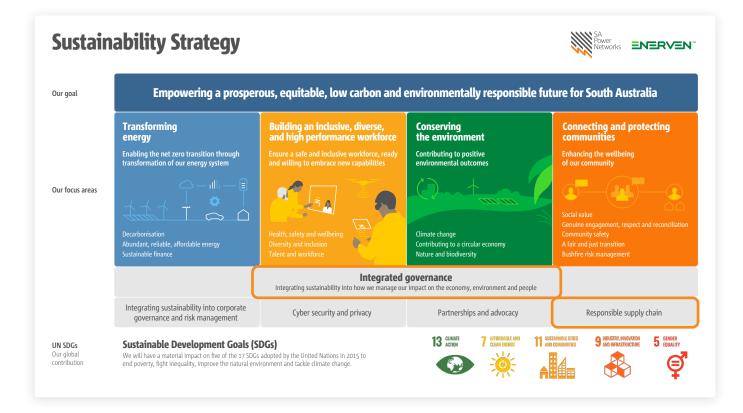
- Delivery of electricity to residential and commercial users
- Providing emergency response services in case of blackouts
- Repairing street lighting
- Meter reading
- Project management and construction and maintenance services for electrical infrastructure projects
- Research and development activities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



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Sustainability Strategy

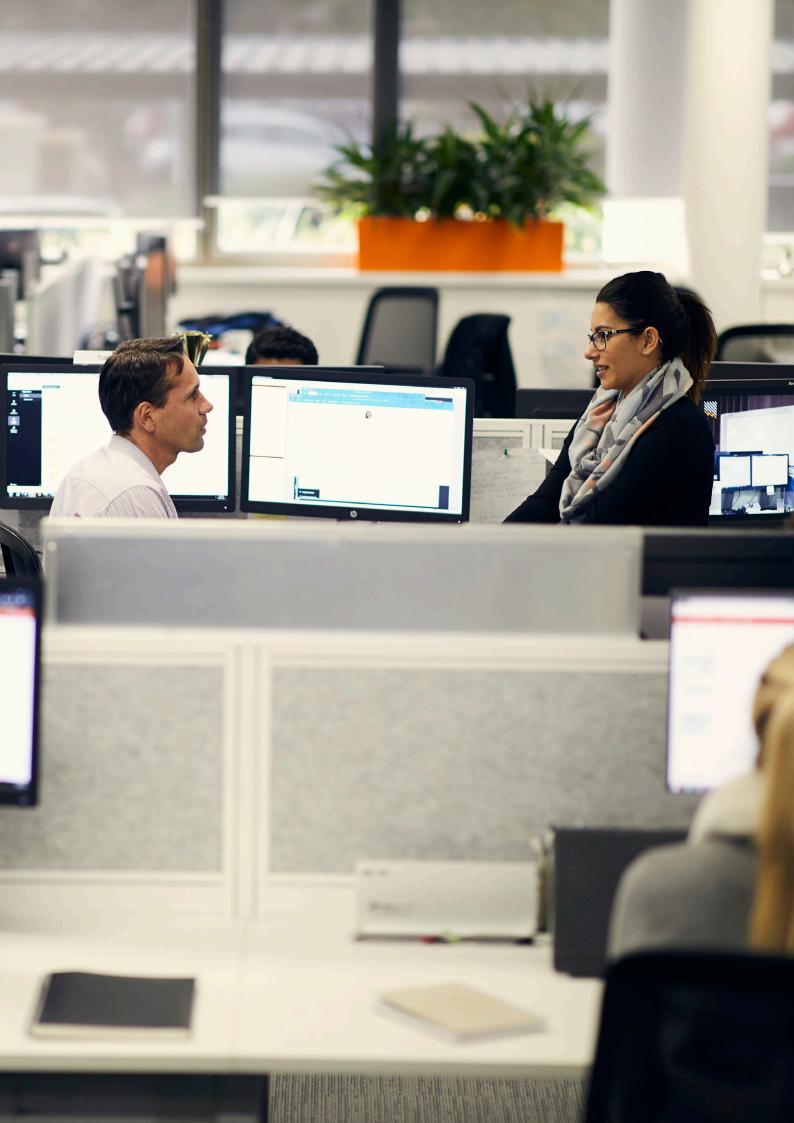
The SA Power Networks Group's Strategic Direction sets out our long-term ambitions through to 2035, with our vision "Leading the transformation of energy services for a sustainable future" reflecting our unique opportunity to support State decarbonisation and prosperity.



The Responsible Supply Chain pillar of our strategy recognises the importance of our supply chain in achieving our sustainability goal.

To help support our Responsible Supply Chain, the SA Power Networks Group:

- Integrates sustainability into procurement decision making and work with suppliers who share our sustainability commitments,
- Seek to influence sustainability in the supply chain through collaboration with peers.
- Continually assess the human rights risk to people in our supply chain.



Our people

SA Power Networks Group is one of the largest non-government employers in South Australia, with over 2,600 people based throughout South Australia supporting the delivery of our operations.

Culture and engagement

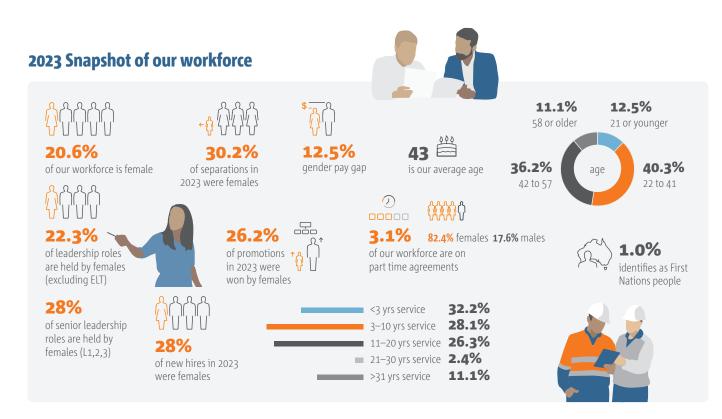
A positive and effective company culture is an integral part of a business's success. The SA Power Networks Group has long prided itself on a great culture, with our people – who are critical to our success – living our purpose and values. We want to ensure that our people are safe, connected, engaged, supported and contributing in ways that are meaningful to them and aligned to our goals.

Over recent years, our people have been through quite challenging times, from providing an essential service throughout the disruption of the COVID-19 pandemic, responding to unprecedented severe storms and the Rover Murray flooding event, and taking on an increasing workload resulting from the rapid energy transition. Concerns about burn-out and disaffection featured in our 2023 Culture and Engagement Survey. The flipside of this was the very strong feedback that SA Power Networks and Enerven are great businesses to work for, and our people want to build on the positives.

In recognition of this, in 2023, we launched a new era of employee engagement, with an invigorated program of initiatives, including a new Employee Value Proposition, an enhanced employee induction process, a new Culture and Engagement Survey regime, improved and more frequent communications – including Town Hall forums – to and from the Executive Leadership Team, and the re-commencement of our Making a Difference Awards after a COVID-19induced hiatus. This program of work will be ongoing and will grow, as we know that creating better engagement and improving organisational culture is something that takes time.

Another important employee engagement process occurred during 2023 as the SA Power Networks Group undertook negotiations for a new Enterprise Agreement (EA). Feedback (via a post implementation review and the Culture and Engagement Survey) on key elements of the previous EA process were predominantly negative, so a new approach – in consultation with employees and Unions – was developed. The 2023 EA negotiation undertaken was a consolidated and conciliated process, involving a dedicated Negotiation Team, enhanced communications, daily meetings with the Single Bargaining Unit, and supported by an Independent Conciliator.

As a result, an in-principle agreement was reached within 2 weeks of consolidated bargaining, and accepted via a vote in December. One of the aims of the refreshed process was to change the way we engage with Unions, and a commitment to ongoing, open and transparent engagement. This more positive and constructive relationship with the Unions is set to continue in the form of a newly established Union Engagement Group.



Structure, operations and supply chains

Workforce statistics

Total Employees as at	1	1	凸
31/12/2023:	Full time FTE	Part Time FTE	Casual FTE
Percentage of those staff covered by the Enterprise Agreement	91.2%	2.9%	1.0%
Percentage of those staff covered by an individual contract	4.7%	0.2%	0%
Number of staff who have visa restrictions	9	0	0
Percentage of employees receiving regular performance and career development reviews	100%	100%	100%
Average hours worked per week	38.48	25.92	23.61

Safety

The goal of our Safety Strategy (2021–25) is "No serious safety incidents or harm to ourselves or others". To achieve this we continuously:

- Focus on health and wellbeing
- Pursue operational excellence
- Strive to eliminate fatal risks
- Hold ourselves and each other accountable
- Assure community safety

Our safety performance in 2023

	Unit	2023	2023 target
Work-related fatalities	#	0	0
Total reportable injury frequency rate (TRIFR)	Rate	7.7	8.0
Fatal risk event	#	2	0
Workers covered by an occupational health and safety system	%	100%	100%

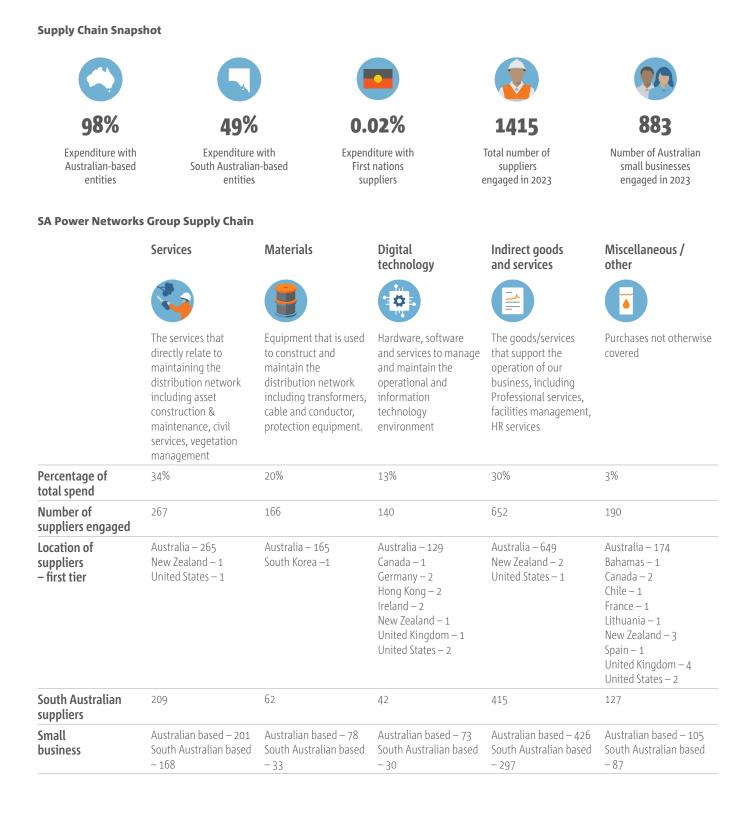
Contractor safety

Our focus on and approach to safety goes beyond our employees, encompassing our contractors and the broader community. We utilise a dedicated Contractor Management System – Sitepass – which enables us to mandate and monitor appropriate safety and environmental compliance standards across our large contractor base. SA Power Networks and Enerven have demonstrated safety leadership in South Australia by hold regular Contractor Safety Forums bringing together our leaders, contractors, health and safety experts and regulators to hear about the latest developments in safety and share experiences about working in the electricity maintenance and construction industry.

The forums conducted in 2023 provided the opportunity to share experiences on the theme of safety in higher risk workplaces, learn about the latest initiatives on mental health and wellbeing, and network with others.

Supply chains

Across the major categories of supply chain engagement, SA Power Networks has a relatively stable group of strategic suppliers who provide the materials, services and digital technology that supports our operations and projects. As a reflection of our business needs, 80% of our services suppliers are located in South Australia and the suppliers who deliver services on-site are subject to SA Power Networks safety requirements.





Criteria 3 – The risks of modern slavery practices in the operations and supply chains

The SA Power Networks Group has zero tolerance to operations that impact sites of Australian Aboriginal and European cultural significance, or those which may come at a "human cost" (eq. slavery).

Risk of modern slavery in our operations

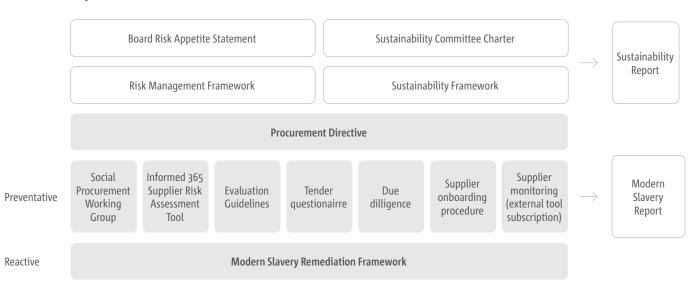
The operation of our business is underpinned by a range of policies, directives, guidelines and codes, which establish the rules designed to protect our employees and suppliers as well as establish the instructions for expected behaviours. The policies, directives and codes which manage the risk of modern slavery in our operations include:

- Code of Conduct
- Fair Treatment Directive
- HR and Ethics Policy
- Whistleblower Directive
- Family and Domestic Violence Support Directive

We consider that our operations, which are in our direct control, have adequate measures in place to manage modern slavery occurring.

Risk of modern slavery in our supply chain

Modern slavery in our supply chain is more challenging to mitigate and manage than it is in our operations. We take a broad approach which seeks to educate and inform ourselves and our suppliers, work collaboratively with other procurement and supply chain professionals to learn and share good practice, perform diligence, and establish legal requirements in our contract arrangements.



Modern Slavery Governance Framework

The risks of modern slavery practices in the operations and supply chains

Supply chain

Approach to managing the risk of modern slavery in our supply chain



2023 updates

Responsible supply chain is one of the commitments and goals set out in the Integrated Governance pillar of the SA Power Networks Group's Sustainability Strategy (see diagram on page 9), which aims to integrate sustainability into how we manage our impact on the economy, environment and people.

Sustainability initiatives such as the reduction of greenhouse gas emissions and environmentally friendly products can have unintended consequences if not balanced and managed carefully, therefore we need to maintain an appropriate balance and awareness of potential adverse outcomes while pursing our initiatives.

SA Power Network's infrastructure for the distribution networks is based in South Australia, requiring all materials to be delivered to and in the State. With the continued growth of our unregulated business, Enerven, supply chain capability (and risk) continues to be extended with delivery now required in other states, specifically New South Wales.



In 2023, the total number of suppliers engaged by SA Power Networks increased from 1342 in 2022 to 1415, with the largest increase being in our indirects category, where we saw an increase of 64 suppliers engaged.

Self-Assessment Questionnaires

SA Power Networks Group continued as a member of the Energy Procurement and Supply Associations' (EPSA) consortium that uses the Informed 365 tool for our suppliers to complete the self-assessment questionnaire.

Self-assessment questionnaires are a valuable tool in the due diligence process, which are best used to complement and inform conversations with our suppliers. With a large supplier base, our ability to have effective conversations with all suppliers is limited, therefore the questionnaires play an important role in risk identification.

That said, in 2023, we continued the rollout of self-assessment questionnaires, with an increase from 142 to 228 completed questionnaires. In collaboration with the EPSA consortium we have discussed the opportunity to improve the questionnaire, and to consider the questions that are most pertinent to small business.

Supply chain – Category risks



Materials category

As in 2022, our materials suppliers are predominantly Australian based (first tier), with one single supplier being based outside of Australia. In 2023 we increased the suppliers in this category who responded to the self-assessment questionnaire by 5.

Our risk in this category continues to be the sourcing and manufacture of components from overseas. During 2023, we continued to gather information on our second-tier suppliers to improve transparency of our supply chain. As part of our collaboration with EPSA we are also discussing the inclusion of second tier suppliers in the Informed 365 tool to support the understanding of the risk to human rights further down in the supply chain.

Many of the organisations in this category are reporting entities who comply with the Act as well as being suppliers to customers across the globe who also have similar human rights expectations and requirements.



Direct Services category

As with 2022, our Direct Services Category mostly requires delivery of services within South Australia with 78% of our direct services suppliers based in the State. However with the expansion of Enerven's interstate operations, there has been a small increase (8) in the number of services suppliers based in New South Wales.

Given the nature of the services, the location of the organisations, and people providing the services and the qualifcations they require, the overall risk in this category remains relatively low.



Digital Technology category

Our Digital Technology Category consists predominantly of Australian-based first tier suppliers with a small number of suppliers based in other countries as shown on page 13.

As with previous years the key risk in this category relates to the manufacture of IT hardware which is done by organisations who are widely used across both Australia and internationally.



Indirect goods and services

As with 2022, our Indirect category of spend contains the largest number of suppliers with an increase of 67 suppliers engaged in the last year. A significant portion of this increase is attributable to the growth in Enerven work interstate.

Small business are account for 49% of the number of suppliers in this category and we consider our overall risk to be relaitvely low.

Our facilities management supplier is in this category and we outlined the due diligence activities with this supplier in our 2022 report. This is a good example where the ongoing conversations with our suppliers provide us the most benefit in terms of understanding how they operate and any risks that exist.



Other/miscellaneous

This category includes suppliers who provide a range of miscellaneous services, including some utility and government services. This group consists of South Australian organisations (67%) and the overall risk is considered low.



Criteria 4 – Actions towards addressing the risk of modern slavery in our supply chain

Progress in 2023

Actions towards addressing the risk of modern slavery in our supply chain

In our 2021 report, the SA Power Networks Group committed to a number of actions across the short, medium and long term. Our second Statement, for 2022, detailed outcomes achieved against each of the actions and highlighted items that had not yet commenced.

In 2023, we have considered the activities that best meet the objectives of the Act, increasing awareness and identify, reporting and addressing the risk.

The actions we have taken during 2023, and will progress in 2024, are aligned with the objectives of the Act. These actions fall into two key categories:

- 1 **Raising awareness** Within the Procurement function, across the wider organisaton and with our suppliers.
- 2 Identify, report and address the risks Self assessment questionnaires, supply chain understanding and monitoring, engagement with suppliers. This includes gathering information and assessing appropriate tools to improve the transparency of second tier suppliers.

Enerven engaging with our suppliers – Case study 1

Self- assessment questionnaires are a valuable part of the due diligence process. However, the best form of understanding how our suppliers operate is through regular engagement and discussion.

During 2023, a delegation from Enerven, including our Procurement Representative travelled to China to engage collaboratively with potential suppliers for a renewables project.

One of the potential suppliers provided an example of a full traceability report for products and while on-site the team was able to view the automated manufacturing facility and discuss the annual assessment process conducted by a third party.

Having these discussions in person, and at the supplier's facilities, provides valuable insight to how our suppliers operate in practice.

Raising awareness – Case study 1: Incorporating modern slavery in regular conversations

SA Power Networks holds monthly *Insight* sessions where a topic of interest is presented and discussed with all members of staff who elect to attend.

During 2023, Sustainability was highlighted with Responsible Supply Chain a topic of the presentation focussing on:

- Integrating sustainability into procurement decision making and working with suppliers who share our sustainability commitments.
- Influencing sustainability in the supply market through our collaboration.
- Continually assessing the human rights risks to people in our supply chain, compounded by global influences.

This was another important opportunity to raise of risks of modern slavery with all attendees which resulted in constructive discussion.

Raising awareness – Case study 2: CIPS Corporate Ethical Procurement & Supply achievement

As a member of the Chartered Institute of Procurement and Supply (CIPS), our Procurement Team complete the CIPS Ethical Procurement and Supply eLearning module on an annual basis.



This eLearning contains three modules, including environmental procurement, fraud bribery and corruption and human rights, with up-to-date training modules provided.

An assessment test is undertaken in each module and all procurement staff completed the three modules. Staff are required to successfully pass each test and upon completion of the Human Rights assessment staff obtain a Human Rights Champion award.

Criteria 5 – Effectiveness assessment

The SA Power Networks Group has considered how our actions, described in section 4 have contributed to increasing awareness and reducing modern slavery risks.

Objective	Assessment
Increased awareness	 Modern Slavery included as a topic in a Whole of Business 'Insight' session on Sustainability which increased awareness with all staff who attended and who have subsequently viewed the recording. Incorporating Responsible Supply Chain (which includes human rights) as a key pillar of our Sustainability Strategy and our Sustainability Report. Incorporation of modern slavery as a topic of discussion in supplier meetings and supplier evaluations. This is ongoing and raised awareness to all supplier staff and our staff who attend these meetings. Completion of the CIPS Ethical Procurement and Supply eLearning moule by Procurement staff. This training and assessment provides ongoing awareness to our staff involved in facilitating the selection of suppliers.
Reduced modern slavery risk	 Increased the number of suppliers who have completed the Modern Slavery Self-assessment questionnaire both raises the awareness of suppliers and assists us in understanding where the risks exist. Further data gathering on the location of our second-tier suppliers provides improved transparency of our supply chain which, in turn, improves our ability to identify where the risks exist.

Criteria 6 – Consultation

Consultation was undertaken at the Board level through consideration and approval of this statement by both the SA Power Networks and Enerven Boards.

The preparation and review of this Statement prior to Board consultation was supported by various teams throughout the organisation.



Energy Procurement and Supply Association (EPSA)

The SA Power Networks Group is a member of EPSA which consists of supply chain and procurement managers from utility companes operating in the Asia Pacific region. Our Manager of Strategic Procurement for Materials and Services is a management committee member.

During 2023, EPSA:

- Hosted the New South Wales Anti-Slavery Commissioner for a presentation and discussion on Modern Slavery and Renewable Energy – Risks and Opportunities.
- Hosted its annual conference on the topic of sustainability, and specifically "Procurement's role in delivering ESG objectives".
- Produced a video, intending to raise awareness, of how procurement has a key role to play in achieving ESG objectives, including those relating to modern slavery.
- The EPSA Modern Slavery Working Group amended the format of its regular meetings so that industry experts could provide regular updates. This has been particularly beneficial to ensure we have regular updates on research, benchmarking, reports and activity progress both within Australia and beyond. This forum supports our understanding of modern slavery and actions being taken at an international, national and local level.



Chartered Institute of Procurement and Supply (CIPS)

The SA Power Networks Group is a member of the Chartered Institute of Procurement and Supply which helps support our links to the procurement and supply chain community within Australia and New Zealand.

Spotlight on Consultation providing the opportunity to learn

Collaboration is imperative to our modern slavery approach. Learning from others – suppliers, industry bodies, government groups, research, is the best way to determine what works and what doesn't.

Following our feedbck to the Review of the Modern Slavery Act in 2022, we received an invitation to attend the Attorney General's Modern Slavery Conference in July 2023. This conference provided the opportunity to hear from a wide range of speakers, who shared their knowledge and lived experience. Key learnings from this conference includes the importance of the "worker voice", particularly with regards to remediation, and the importance of changing the focus from the risk of modern slavery in our supply chain to focus on the risk our actions may have on people's human rights.

Spotlight on leaning and collaboration – ESG in Procurement

During September, our Head of Procurement and Shared Services attended the ESG Procurement Conference in Sydney.

The opportunity to collaborate and consult with peers on the broader topic of ESG, while learning how other companies approach ethical procurement and address the risk of modern slavery allowed learnings to be brought back to the team.

Conferences and learning opportunities such as this demonstrate the willingness of companies to make a difference, individually and collectively.

Criteria 7 – Other relevant information

The SA Power Networks Group Modern Slavery Statement was approved by the Board of SA Power Networks on 27 February 2024, and the Board of Enerven on 27 February 2024.

The Statement has been signed by:

Andrew Bills as the Chief Executive Officer of SA Power Networks and as a member of the Enerven Board.

Peter Tulloch as the Chairman of the SA Power Networks Board.







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



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

