# **Modern Slavery Statement**

2023



# Australian Modern Slavery Act 2018 reporting criteria

|    |  | Page/s         |
|----|--|----------------|
| a) | Identify the reporting entity  | 4              |
| b) | Describe the structure, operations and supply chains of the reporting entity   | 5 - 6, 7 & 9   |
| c) | Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls  | 7, 9 - 11      |
| d) | Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes             | 7 - 8, 11 - 13 |
| e) | Describe how the reporting entity assesses the effectiveness of such actions   | 14 - 15        |
| f) | Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement | 18             |
| g) | Include any other information that the reporting entity, or the entity giving the statement, considers relevant  | 16 - 18        |



# **Message from the Managing Director**



I'm pleased to release EnergyAustralia's 2023 Modern Slavery Statement. This is EnergyAustralia's fourth Modern Slavery Statement and it sets out our commitment to prevent modern slavery.

At EnergyAustralia our purpose is to lead and accelerate the clean energy transformation for all. As we transition to Net-Zero, we do so with the knowledge that it will present risks of modern slavery.

We have a zero tolerance for the human rights abuse that is modern slavery. Every day, we focus on how we can identify, prevent and play an active role in eradicating these practices and support those who are impacted.

We have stringent processes in place that are regularly reviewed to identify where risks of modern slavery exist within our business. But we know that on an international scale our influence is often limited when working with multinational suppliers, many of which have complex supply chains.

Addressing modern slavery involves working collaboratively with our suppliers along with industry stakeholders and Government, to understand where risks are, and where we need to make changes.

The very nature of modern slavery is that it is deceptive and hidden, but eradicating it is critical, and we as a business will always work to operate ethically.

Mark Collette

Managing Director, EnergyAustralia



# **About this Statement**

# i. Reporting Entity

This Modern Slavery Statement is made under the *Modern Slavery Act 2018 (Cth)* (the Act) by EnergyAustralia Holdings Limited (EAH) (ABN 57 101 876 135) on its own behalf and on behalf of the following controlled subsidiary companies, which meets the reporting entity criteria of the Act:

- EnergyAustralia Pty Ltd (99 086 014 968)
- EnergyAustralia Yallourn Pty Ltd (47 065 325 224)
- EnergyAustralia NSW Pty Ltd (75 163 935 635)
- EnergyAustralia Tallawarra Pty Ltd (69 081 074 142)
- EnergyAustralia Investments Pty Ltd (27 113 121 592)
- EnergyAustralia AusPower Pty Ltd (83 073 060 054)

As of 31 December 2023, the EnergyAustralia Holdings Limited Group comprised of 37 controlled subsidiaries and 3 Joint Venture entities. Together, EnergyAustralia Holdings Limited and its controlled subsidiary companies are referred to as EnergyAustralia. EnergyAustralia is a wholly owned subsidiary of CLP Holdings Ltd (CLP).

The Boards of EnergyAustralia's reporting subsidiary companies and the Board of EnergyAustralia Holdings Limited have reviewed this Modern Slavery Statement. This Statement has been approved by the Board of EnergyAustralia Holdings Limited on behalf of all reporting entities and it is signed by the Managing Director and Chair. This Statement has been prepared to meet the mandatory reporting criteria set out under the Act.

# **About EnergyAustralia**





### i. Our structure

As one of Australia's largest energy retailer and generators, we have 1.6 million customers or 2.44 million accounts, across the eastern seaboard, from Southern Queensland, down to New South Wales, Australian Capital Territory, Victoria and South Australia.

### **CLP**

EnergyAustralia is a wholly owned subsidiary of Hong Kong listed CLP Holdings (CLP) and one of Australia's largest integrated energy businesses. CLP was founded in 1901 in Hong Kong and entered Australia in 2001 by acquiring a majority interest in Yallourn Energy. In 2011, CLP completed the acquisition of energy retailer EnergyAustralia. CLP has a strong focus on governance and ethical business practices.

### Retail

As an energy retailer as well as a generator, we buy and generate electricity and purchase natural gas on behalf of our customers. We provide billing and account management services for our customers, as well as offer innovative energy products and services behind the meter.

### Generation

As at 31 December 2023 we operated a portfolio with a total energy generation of ~5,000MW. We own and operate or control energy generation facilities across southern and eastern Australia, in coal, gas, solar, wind and renewables firming.

One of our biggest energy generation assets is Mount Piper Power Station. Located in the Hunter region of New South Wales, its 1400 MW coal-fired generators meet the energy needs of just over a million homes each year.

At the other end of the scale is the gas-fired Hallett power station. Located in South Australia it steps in when energy demand is high and has a total capacity of 235MW.

We announced in 2023 that we are targeting an expansion of our renewable portfolio (with partners) to include up to 3GW of renewable energy committed or operational by 2030, with a focus on large-scale wind-generation assets. We articulated this target in our inaugural <u>Climate Transition Action Plan</u>.

### Workforce

Our people are our greatest asset. As at 31 December 2023 we employed 2193 people across our generating sites, head office in Docklands, Victoria, and our Geelong contact centre. We are committed to having a diverse and inclusive workforce, this includes gender, sexual orientation, gender identity,



age, disability, marital or family status, ethnicity, nationality, cultural backgrounds, perspectives, and other areas of difference. Women make up almost 40% of our workforce, and women represent 60% of our Executive Leadership Team.

We remain focused on delivering our <u>Reconciliation Action Plan (RAP)</u>; supporting parents through our leading parental leave policy; and continue to work to gender equality and inclusion of LGBTQI+ people. Our EA Way behaviours represent the core of who we are when we are at our best and the way we work together to achieve our strategy and Purpose to "lead and accelerate the energy transformation for all". Our EA Way behaviours are Be Purposeful, Be Bold and Move Fast, Make a Difference, and Play More Together.

### ii. Governance

All EnergyAustralia entities operate under a common set of governance policies, including a Modern Slavery Policy which outlines EnergyAustralia's stance on modern slavery and how risks of modern slavery within our operations and supply chain are to be identified, assessed and addressed. Our Modern Slavery Policy is supported by other policies, processes and systems described in this Statement.

The Board of EnergyAustralia Holdings Limited has oversight of our compliance with legal and regulatory matters.

As part of its governance structure, EnergyAustralia has an Audit and Risk Committee which functions to review the effectiveness of our risk management systems for both financial and non-financial risks and internal controls, and the systems and procedures for compliance with applicable legal and regulatory requirements.

The Executive Sustainability Committee supports the Board Sustainability Committee and meets monthly. Sustainability at EnergyAustralia means how we conduct business sustainably through a commitment to making a positive impact on health, safety, employee wellbeing, the environment, climate change and the net zero transition, the community and cultural heritage. Our approach to Modern Slavery is part of this important commitment. The Executive Sustainability Committee is accountable for the performance of the business in relation to Sustainability.

The Executive Sustainability Committee's charter includes reviewing the effectiveness of our programs based on our continuous improvement ambitions, as well as providing recommendations, information, and reports to assist the Board Sustainability Committee fulfil its responsibilities.

In turn, the Board Sustainability Committee will assist the Board and management in the oversight and review of EnergyAustralia's objectives to be a sustainable organisation. They will review and monitor key sustainability policies, strategies and programs, including those related to Modern Slavery.



# **About our operations**

### i. Overview

EnergyAustralia employs nearly 2,200 people all based in Australia. Most of our workforce are engaged directly via employment contracts and/or enterprise agreements on a permanent, fixed/maximum term or casual basis. Our employment contracts, enterprise agreements and workplace policies are regularly reviewed to ensure compliance with workplace laws, including the *Fair Work Act 2009 (Cth)* and National Employment Standards.

All forms of modern slavery and related behaviour are forbidden under EnergyAustralia's Code of Conduct, Workplace Behaviour Policy and Modern Slavery Policy. We also have a comprehensive Work Health and Safety (WHS) policy and site-specific WHS procedures regarding working conditions. Our employees and extended workforce undertake mandatory annual training in relation to the Code of Conduct. All policies are reviewed and updated at least every 2 years.

# ii. Risks of modern slavery

An internal audit focusing on EnergyAustralia's hiring policies and practices was completed in 2022 with no significant risks of modern slavery in our operations identified. Audits are undertaken every 4 years. We acknowledge that while no current significant risks were found in that assessment, this does not guarantee that instances of modern slavery cannot occur. As such, we continually monitor risks and review internal policies and practices to ensure compliance.

### iii. Actions taken to address modern slavery risks

EnergyAustralia has several mechanisms in place to capture employee concerns and grievances, including those relating to modern slavery. These are communicated to all employees on commencement as part of induction processes and then regularly to people via the company intranet, direct emails and annual online training and include:

- Grievance policy and procedures
- Whistleblowing program
- Anonymous Employee Engagement Survey
- Code of Conduct
- **Integrum** our Incident Management system to report any health and safety hazards, near misses and incidents.

Registers are maintained to record any allegations or breaches related to policy and compliance by the People and Culture, Group Internal Audit, Legal and Governance and HSSE functions.



There were zero modern slavery breaches reported in 2023. In the instance that an allegation of modern slavery was made in our operations, it would be reviewed and comprehensively investigated by a senior member of EnergyAustralia's People and Culture team and Group Internal Audit. Any breach of our policies or procedures could result in measures such as individual disciplinary action, corrective operational changes, or a review of compliance controls.

### Effectiveness of grievance mechanisms iv.

During 2023, of the mechanisms we have in place to raise a grievance, complaint or concern, the following were reported:

- Grievance policy of the 214 cases that were managed by the People and Culture team, 11 were formal Grievances. Other themes include under performance, poor conduct/behaviour, and injury and illness management. Zero were related to Modern Slavery.
- Whistleblower program Group Internal Audit (GIA) investigated 5 complaints. 3 were via the Whistleblower hotline, 2 were raised directly with GIA. Zero were related to Modern Slavery.
- Employee Engagement Survey 2 surveys were conducted in 2023. Comments were received from the majority of our employees. Comments were predominately related to career development and company performance. Zero were related to Modern Slavery.
- Integrum 1042 safety hazards, near misses or incidents were investigated in 2023. Zero were related to Modern Slavery.



# About our supply chain

### i. Overview

As of 31 December 2023, EnergyAustralia had 2,587 active suppliers, 1471 (57 per cent) of which are classified as Australian small businesses. 95 per cent of our suppliers are registered with an Australian address, including several multinational suppliers with Australian headquarters, and these suppliers represented 98.2 per cent of our expenditure in 2023. In 2023, EnergyAustralia's total spend with suppliers was \$921 million for goods and services, and \$1.158 billion for spend for fuel (coal and gas) for a total of ~\$2.1 billion.

Many of our suppliers have supply chains that are outside Australia. We rely on supplier Self-Assessment Questionnaires to report about their own operations and supply chains. We use this information in conjunction with human rights reports, media articles and our risk framework to assess the risk of modern slavery in our supply chain (see below).

### ii. Risks of modern slavery

According to the Global Slavery Index 2023, Australia imports an estimated \$USD 17b of products with a high risk of modern slavery. These products include electronics, solar panels, clothing and textiles, products that EnergyAustralia obtains from our suppliers through global supply chains. It is possible that EnergyAustralia could be directly linked to modern slavery if any of the goods that are imported to Australia and purchased by us were produced, transported and provided using modern slavery at any point in the supply chain. We recognise that the risk of modern slavery is more likely to be higher in the lower tiers of our supply chain, where we have less visibility and influence. We work with our large and multi-national suppliers to increase our understanding of their complex supply chains, and to understand how they utilise their influence to reduce the risks of modern slavery.

Our Risk Assessment Framework considers risk factors based on registered supplier location and the commodity they provide. These factors enable us to determine a risk rating. We use independent data from the US Bureau of International Labour Affairs' List of Goods Produced with Child Labour or Forced Labour, and from Walk Free's Global Slavery Index to determine the risk of the commodities we purchase. In 2023 we refreshed our Risk Assessment Framework with additional information provided by Sheffield Hallam University regarding forced labour in China.

The commodities we consume that are high risk based on these sources are:

| Commodity                            |   |
|--------------------------------------|---|
|                                      | There are multiple allegations of modern slavery risks in the |
| Solar collection devices & batteries | global solar supply chain, particularly in relation to        |
|                                      | polysilicon production, connected to the Xinjiang Uyghur      |



| Autonomous Region (XUAR), as well as current and historical risks associated with cobalt (a raw material in the manufacturing of batteries) being sourced through child and forced labour in artisanal mines in DR Congo.  Our assessment of risk for these commodities is based, in part, on the US Customs and Border Protection (CBP)  Department's US Uyghur Forced Labor Protection Act which |
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| manufacturing of batteries) being sourced through child and forced labour in artisanal mines in DR Congo.  Our assessment of risk for these commodities is based, in part, on the US Customs and Border Protection (CBP)  Department's US Uyghur Forced Labor Protection Act which   |
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| prohibits import of goods to the US produced in Xinjiang   |
| including several polysilicon (a major component of solar  |
| panels) and solar panel manufacturers, and the Sheffield   |
| Hallam University's "Over-Exposed" report, further   |
| highlighting modern slavery risks in the solar supply chain.   |
| The electronic manufacturing industry has had numerous   |
| lectronic Goods (including allegations of modern slavery through all levels of the   |
| <b>computers, communication</b> supply chains of componentry including in the sourcing of  |
| evices, electronic hardware and raw materials from high-risk geographies. The industry is at   |
| quipment, office machines and risk of forced labour and human trafficking including the  |
| omestic appliances) use of migrant labour particularly in countries where  |
| electronics are predominantly produced.  |
| The clothing and footwear manufacturing industries are   |
| high risk industries for modern slavery. Multiple  |
| allegations, both current and historical, have been made in  |
| <b>lothing and Footwear</b> relation to the manufacture of clothing and footwear, in   |
| multiple countries. Reports also claim that cotton from  |
| XUAR is produced by forced labour and laundered through  |
| other countries to hide its point of origin.   |
| Security and Cleaning Services are considered a high risk of   |
| modern slavery in Australia due the prevalence of sub-   |
| contracting arrangements in the industry and high rates of   |
| migrant labour.  |
| The Australian latex and nitrile glove industry have reported  |
| on forced labour found in their factories and supply chains  |
| and the US CBP has blocked import of gloves from certain   |
| manufacturers based in Malaysia after finding evidence of  |
| forced labour.   |
| Forced labour in the electronics good industries means that  |
| vehicles purchased or leased have a risk of modern slavery   |

In 2023, we had 4 suppliers who were registered in three potential high-risk geographic locations for modern slavery: India, China, and the Philippines. EnergyAustralia also has out-sourced call-centres and



back of house services in the Philippines and India. We monitor these services in accordance with our policies, processes and frameworks.

### **Case Study**

EnergyAustralia was invited to bid in a solar photovoltaic panel tender for another Australian-based company. The tender specifications called for solar panels from a particular manufacturer that were considered at a higher risk of modern slavery from externally available information. We raised our concerns with the company and declined to bid on the project.

Existing suppliers who are assessed as high risk are required to complete our Modern Slavery Survey and their responses are reviewed in accordance with our Risk Assessment Framework (see below). New suppliers are assessed in line with our onboarding process (see page 13).

### iii. Assessing modern slavery risks

We contribute information to CLP Group's annual <u>Sustainability Report</u> through surveying critical suppliers with a Responsible Procurement (RePPS) questionnaire, regarding their Environment, Sustainability and Governance (ESG) practices. Critical suppliers are defined as those who currently hold or will hold a contract with a total value of \$1 million or more or those who we have spent over \$1 million with in the previous 12 months. This questionnaire is now identical to our Modern Slavery Survey. We have included these questionnaires in our assessment of modern slavery risk in our supply chain in 2023.

EnergyAustralia's Modern Slavery Survey and RePPS questionnaire asks a range of questions relating to suppliers' knowledge of their supply chain; organisational policies, including modern slavery; countries from which the products or services were sourced from; country in which they are headquartered; awareness of allegations of modern slavery in their operations, industry or supply chain; organisational size; knowledge of migrant workers in their supply chain; source of raw materials; and whether they screen suppliers in their supply chain for modern slavery risks. It also covers other ESG elements.

In 2023, we asked 79 suppliers to respond to our Modern Slavery Survey and 88 suppliers to respond to our RePPS questionnaire (which is voluntary). This represents, in total, ~33% of our 2023 spend. By 31 December 2023, we had received responses from 52 (66%) of the suppliers we sent our Modern Slavery survey to, and responses from 49 (56%) of the suppliers we sent the RePPS questionnaire to. We also received two (2%) refusals from suppliers to complete the RePPS questionnaire.

Of the suppliers who have not responded to our Modern Slavery Survey, five of these suppliers have also failed to respond in prior years and we have implemented controls to ensure that no future orders can be placed with them. This action is only taken after multiple attempts to follow up with the supplier to understand what processes or policies they may or may not have in place to address modern slavery. EnergyAustralia welcomes working with suppliers to address any policy or process gaps they may have



and ending our relationship with a supplier is a last resort. We will continue to follow up the suppliers who have not responded to our survey request, with oversight through our Executive Sustainability Committee.

Of the suppliers who completed our modern slavery surveys, 9 of these suppliers did not have any formal policies in place specifically relating to modern slavery risk. We continued our approach to consider the size of the supplier's business in managing supplier governance. For Australian small business suppliers with fewer than 20 employees, we asked the suppliers to confirm that they abide by our Supplier Code of Conduct. For suppliers with over 20 employees, we asked the suppliers to confirm that they abide by our Supplier Code of Conduct and to create relevant policies and/or processes over the next 12 months, advising suppliers to contact their local Chamber of Commerce or other Industry association for policy templates. We will follow up with these suppliers in 2024 and 2025.

In 2023, we continued surveying Tier 2 suppliers for our merchandise supplier, a small business without the capacity to survey their own suppliers. Overall, Tier 2 responsiveness was positive and the Tier 2 supplier's responses were shared with our merchandise supplier, including if we had any concerns about their supplier responses. We have also undertaken a deep dive into the supply chains of our solar panel suppliers using publicly available information, as well as holding discussions with our solar suppliers.

For the purchase of international carbon offset certificates, EnergyAustralia sources reports from Ndevr Environmental for major purchases which, in part, examines the human rights risk of projects. These reports guide EnergyAustralia whether to purchase from the carbon offset project based on the risks of modern slavery in the supply chain or ownership of the project.

### Policies and contractual terms iv.

EnergyAustralia has a publicly available Supplier Code of Conduct which details the behaviours we expect from our suppliers. These include paying wages and benefits in accordance with the law; workers not exceeding local work hour limits or 60 hours per week; and prohibiting the use of forced labour or child and underage labour.

Our <u>Purchase Order terms</u> and contract precedents require suppliers to confirm that they consider the risks of modern slavery in their operations and supply chain and will notify us of any suspected or actual instances of modern slavery within their operations and supply chain.

### Case Study

During 2023 one of our contracted suppliers approached us to let us know, in line with their contractual obligations, that they had received an allegation of forced labour at one of their suppliers. They had completed an audit of their supplier and determined that there was no forced labour at their supplier, but when they looked at the overall ownership structure of the company there were concerns that other subsidiaries of the parent company may be engaged in forced labour. Our



supplier informed us that they had, out of an abundance of caution and on their own, ceased ordering from their supplier and would maintain a relationship with their supplier until the warranties for the products they had sourced had ended.

### Working with EnergyAustralia for the first time ٧.

New suppliers of EnergyAustralia are required to complete our onboarding questionnaire which includes questions relating to modern slavery, including whether they have their own working practices and safeguards in place to evaluate and select their own suppliers and subcontractors relating to these same issues. Where suppliers indicate that they do not have their own similar policies or working practices, we ask them to confirm that they commit to EnergyAustralia's Supplier Code of Conduct.

In 2023 we revised our approach to market documentation (RFx) templates to consider multiple areas of risk, including modern slavery. RFx templates were updated to cover all procurement managed market approaches and include seeking information and evidence from suppliers regarding their governance policies.

### vi. Investigating allegations of modern slavery

EnergyAustralia actively monitors various sources for relevant information that can help inform our understanding of risks. We are aware of allegations of modern slavery at an industry level (such as in the manufacturing of solar panels, and nitrile and latex gloves) and in some of our suppliers' supply chains. We work with our suppliers to understand their supply chains, what actions they have taken to address or remediate issues and confirm that their own governance policies and processes act to mitigate risks of modern slavery. Only as a last resort would we terminate a relationship with a supplier. We also work with industry and other stakeholders including government, as we seek to help mitigate the risk of modern slavery practices occurring in the supply chains of goods and services.



# **Assessing effectiveness**

An effective response to modern slavery is one where our policies, processes and other actions identify the modern slavery risks in our supply chain including any emerging risks, where we mitigate those risks, and where we respond appropriately to any instances of modern slavery.

We acknowledge that the hidden nature of modern slavery can make it difficult to accurately determine the full impact of our actions and initiatives. We remain committed to continuous improvement in our approach to assessing the risks of modern slavery in our operations and supply chain.

| Focus Objective     |  | Actions  | 2023 Output   | Outcome  |  |
|---------------------|--|--|---|--|--|
| Risk identification | Identifying modern slavery<br>risks in EnergyAustralia's<br>supply chain | Monitoring supplier risk<br>through media alerts<br>and third-party risk<br>services   | Expanded media alerts<br>beyond keywords to<br>high risk and critical<br>suppliers  | Increased supply chain transparency  |  |
|                     | Identifying modern slavery risk in EnergyAustralia's operations          | <ul> <li>Issuing and assessing self-assessment questionnaires to suppliers</li> <li>Maintaining our grievance and whistleblowing programs, review of half yearly engagement survey results and comments</li> </ul> | <ul> <li>167 self-assessment<br/>questionnaires<br/>requested</li> <li>Grievance and<br/>whistleblowing<br/>programs maintained,<br/>review of engagement<br/>survey results and<br/>comments undertaken</li> </ul> | <ul> <li>Increased         understanding of         potential supply chain         and operational risks</li> <li>Clarity of how seriously         EnergyAustralia takes         any conduct that is         unlawful, improper or in         breach of our policies         and how to report and         seek support</li> </ul> |  |



| Engagement | Continuing engaging with our people, suppliers, customers, investors, regulators, industry, and civil society   | • | Active participation in industry and civil society forums Information sharing with strategic suppliers and commercial and industrial customers about Modern Slavery risk | Attended briefings with, or met: Fair Supply; Walk Free Foundation; Attorney General's Department and United Nations Global Compact Australia.  Met with commercial customers, peer organisations and suppliers regarding Modern Slavery | • | Building capacity and new industry norms  Collaborative approach to modern slavery risk assessment, and mitigation and remediation activities where required |
|------------|---|---|--|--|---|--|
| Education  | Increasing awareness and understanding of modern slavery risks throughout EnergyAustralia Ensure that mandatory Code of Conduct Training is completed by staff and relevant contractors | • | Develop bespoke Modern Slavery learning module  Monitor completion of training and ensure completion   | <ul> <li>Face to face sessions delivered across energy generation sites, corporate business units and Procurement</li> <li>98% of our employees completed their Core Compliance modules by the due date, across the company</li> </ul>   | • | Awareness of modern<br>slavery risks and<br>obligations across our<br>Operations and Supply<br>Chain   |
| Oversight  | Embed ownership of<br>modern slavery risk and<br>processes in the Board and<br>Executive Sustainability<br>Committees   | • | Modern slavery is a recurring agenda item  | Ongoing  | • | Senior oversight of<br>modern slavery risk<br>across operations and<br>supply chain  |



# Looking ahead

Our work to identify and mitigate modern slavery risks in our business is an ongoing process. Our efforts to date have set a strong foundation for continued improvement. Building on what we've learned so far, EnergyAustralia will continue to refine its approach with best practice advice.

Our priorities for 2024 are:

- Ensuring our People and Culture team maintain their current training and awareness of modern slavery risks and practices in our Operations
- Implementation of a companywide Regulatory Compliance Uplift Plan to achieve best practice in prevention, detection and response to regulatory compliance
- Focus sessions on our EA Way behaviours which reinforce speaking up and taking action if you see something that's not right
- Key to creating a speak up culture is having simple and easy to find tools for reporting hazards, concerns and complaints. We are launching an improved, simple reporting process which will go live with the launch of a Psychosocial Hazards Training Module in Q1 2024
- Discuss tier 2 suppliers with our strategic suppliers to understand Modern Slavery risk in our Supply Chain
- Determine steps required to align to the UN Guiding Principles
- Implementation of our Supply Chain Risk Management framework, including consideration of
- Continue working with suppliers who have not yet completed our Modern Slavery Survey
- Ensuring our Procurement team maintains their current training and awareness of modern slavery risks and practices in our supply chain
- Creation of an online Supply Chain focussed Modern Slavery training package, available to all
- Continuing collaboration with other organisations to share knowledge and improve processes

Against our priorities for 2023, we have made the following progress:

| Improvement initiative  | Progress  |
|---|---|
| Continued improvements to our internal processes such as reviewing our supplier surveys and policies in line with best practice | Ongoing  Supplier surveys were issued through a user-friendly platform so that suppliers could respond to our surveys easier, or sent out in Word version if requested by suppliers.  EnergyAustralia's governance processes include at least two-yearly review of all policy and process documents |



| Ensuring our Procurement teams maintain their current training and awareness of modern slavery risks and practices, both globally and within our business  | Ongoing  EnergyAustralia completed training for the Procurement team and developed training material to be delivered across all of EnergyAustralia. News, alerts and research were shared with the relevant Procurement teams for their action. |
|--|---|
| Continuing collaboration with other organisations to share knowledge and improve processes, including how to tackle issues of modern slavery if identified | Ongoing  EnergyAustralia has held discussion with multiple companies in 2023 regarding supplier risk, including modern slavery risk. We have also participated in forums and briefings on modern slavery with other Australian organisations.   |
| Inclusion of Modern Slavery in a broader EnergyAustralia Sustainability Framework including communication and training opportunities                       | Ongoing  The Sustainability Working Group has representation from multiple Business Units and provides points of contact across the organisation for communication, training and other focussed activities.                                     |
| Collaboration across the CLP<br>Group on Supply Chain Risk   | Ongoing  EnergyAustralia has continued to participate in CLP Group projects regarding Sustainability, Responsible Procurement and the finalisation of the Supply Chain Risk Management Framework.   |
| Review of risk management<br>tools within EnergyAustralia, to<br>examine how best to track<br>supply chain risks   | Ongoing  A range of tools have been investigated and companies shortlisted.   |
| Continued work with suppliers who have not yet completed our Modern Slavery Survey   | Ongoing  We have continued discussions with suppliers who have not completed our Modern Slavery Survey to continue to build a fuller picture of our risk profile.   |
| Ensuring our People and Culture team maintain their current training and awareness of modern slavery risks and practices                                   | Ongoing  We continue to conduct training and awareness through regular policy reviews, face to face and online training, employment law forums and updates.   |



Continuing our culture of speaking up and taking action if you see something that's not right

### **Ongoing**

In addition to our formal policy training, our EnergyAustralia behaviours encourage everyone to "Be courageous, communicate honestly and openly", and "Do the right thing for each other, our stakeholders, communities and environment".

# Consultation

With the exception of Echo Group, which is in the process of integrating into EnergyAustralia, all other EnergyAustralia entities share a common set of governance policies. Work undertaken by our Procurement, People and Culture and Risk Assessment teams outlined in this Statement included engagement with our senior leadership and Executive Leadership Team and each reporting entity covered by the statement and the entities we own or control.

EnergyAustralia is aware of the limitations of buying power that we have as a company, and as part of an industry, with some large multinational or foreign government owned companies. We remain committed to working with industry bodies, Australian government agencies and bodies, and NGOs to be aware of specific and broader allegations of modern slavery and to work collectively in reducing modern slavery risk. To this point EnergyAustralia met with several customers, suppliers, other companies, government and NGOs during 2023 in order to share information, learn from each other, and increase understanding on modern slavery risks, actions, reporting frameworks, and strategies.

# **Approval**

The Executive Leadership Team of the EnergyAustralia Group has also been involved in the review and endorsement of this Statement. This Statement was approved on 29 April 2024 by the board of EnergyAustralia Holdings Limited, the holding entity of the EnergyAustralia Group, after consultation with the Board Sustainability Committee.

**Managing Director, EnergyAustralia** 

Jane McAloon

Chair of the Board, EnergyAustralia



At EnergyAustralia, we recognise the Aboriginal and Torres Strait Islander peoples as the Traditional Owners of the land on which we operate and the communities we serve. Our goal is to build working relationships with Aboriginal and Torres Strait Islander peoples, communities and businesses. Through reconciliation we live our behaviours of being purposeful and making a difference.

# **EnergyAustralia Pty Ltd**

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# **EnergyAustralia Whistleblowing information**

You can submit a report in a number of ways:

- 1. In writing or verbally to Head of Group Internal Audit on (03) 9060-0000 at Level 19/697 Collins St
- 2. Contacting the anonymous externally hosted channel 'Fair Call' via
  - Phone: 1800 500 965. This free call number is available 24 hours, 7 days a week.
  - Email: faircall@kpmg.com.au
  - Web: <a href="http://faircall.kpmg.com.au">http://faircall.kpmg.com.au</a>. Whistleblowers may complete and submit a form online. This method does not permit two-way communication unless the whistleblower provides contact details.
  - Post: FairCall Manager, PO Box H67, Australia Square 1213, Sydney
  - **Fax**: (02) 9335 7466