

Modern Slavery Statement 2023



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Foreword

Victoria Power Networks depends on our team of over 2,300 employees and contractors to deliver reliable, affordable, safe and flexible electricity to customers.

Managing risk is integral to what we do. The safety of our people and the community we serve underpin our policies, systems and processes. We understand that our responsibility extends beyond our business, to the third parties supplying us goods and services so we can deliver our services.

Our operations vary from maintaining poles and wires, inspecting and cutting vegetation, building large-scale solar farms or supporting customers to connect clean energy technology. We rely on at least 1,475 active suppliers to deliver the products and materials we need to deliver our services.

We work hard to choose the right suppliers and consider a range of non-price factors including safety performance, labour practices and values alignment and supporting the communities in which we operate. We will not tolerate any form of modern slavery in our business, or knowingly conduct business with anyone who does. This is backed by our corporate policies, procedures and culture.

We continue to take actions to evaluate our supply chains, including risk assessments of our supply categories and suppliers and updating policies to consider modern slavery risks. In 2023, we provided training for relevant employees about modern slavery, its meaning, how to identify examples and what processes are in place to report any instances that may arise. We have also started to dig deeper into our supply chains through extended due diligence reviews to ensure not only our suppliers, but also their suppliers are meeting societal expectations when it comes to modern slavery commitments.

We continue to be proud of our work to encourage our employees to speak up if they uncover activities or behaviours that don't meet societal expectations. Everyone should feel safe to report inappropriate or illegal behaviour, including possible modern slavery examples, and our Whistleblower Program continues to provide an anonymous channel for all employees, contractors and suppliers to do so.

Following our roadmap, we continue to work with our peers to further minimise modern slavery risks, improve training, and conduct annual risk assessments of our operations and supply chains. This ongoing and continual improvement will be a key focus of addressing potential modern slavery issues and we look forward to reporting on our progress.

Peter Tulloch

Chairman

Tim Rourke

Chief Executive Officer

1. About us

1.1 Who we are

Victoria Power Networks (VPN)

Victoria Power Networks Pty Ltd is the holding company for the VPN group, which owns and operates the CitiPower and Powercor electricity distribution networks and the Beon energy solutions business.

Our ownership is divided between CK Infrastructure, Power Assets Holdings and Spark Infrastructure.

CK Infrastructure and Power Assets Holdings, which are listed on the Hong Kong Stock Exchange and members of the CK Group, hold a 51 per cent stake in VPN. The CK Group operates in over 50 countries with about 310,000 employees.

Spark Infrastructure, an entity owned by funds managed or advised by Kohlberg Kravis Roberts & Co. L.P. and/or its affiliates, Ontario Teachers' Pension Plan Board and Public Sector Pension Investment Board, owns the remaining 49 per cent of VPN. Spark Infrastructure invests in essential energy infrastructure.

1.2 Our businesses

CitiPower and Powercor electricity distribution networks

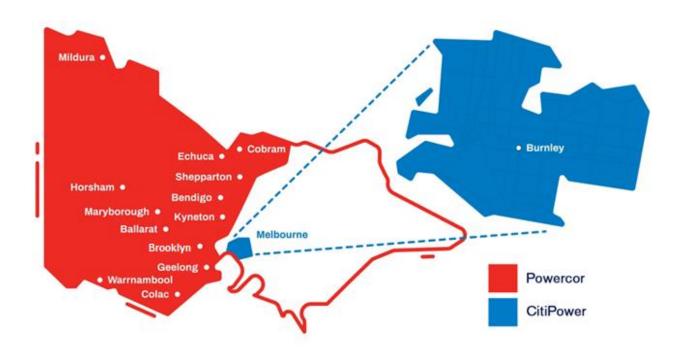
Our networks distribute electricity to more than 1.2million homes and businesses across Melbourne's CBD, western suburbs of Melbourne and through central and western Victoria to the South Australian and New South Wales borders.

In the CitiPower network, electricity is distributed in the region via a network comprising over 4,500 kilometres of wires, supported by more than 57,000 poles and associated infrastructure. The Powercor network comprises over 77,000 kilometres of wires, supported by more than 600,000 poles and associated infrastructure.

Our purpose as Distribution System Operators is to ensure all forms of distributed energy resources – such as solar, batteries, smart appliances and electric vehicles – are integrated efficiently and flexibly in a system that benefits customers.

Our networks play a critical role in supporting Victoria's clean energy transition. More than 1800MW of solar, wind and other renewable generation is connected to our network, which is home to four of Victoria's Renewable Energy Zones, while more than 21 per cent of Powercor's customers are benefitting from rooftop solar. We are at the forefront of finding innovative ways to support Victoria's energy transition through projects and trials investigating community batteries, smart charging for electric vehicles, and microgrids and other community energy projects.

Both networks are considered among the most efficient and reliable across the National Electricity Market.



Fast Facts	
CITIPOWER	POWERCOR
349,689 customer connections	920,608 customer connections
57,491 poles	602,760 poles
4,595 kms of powerlines	77,438 kms of powerlines
51% underground	11% underground
157km2 region	145,651km2 region

Beon Energy Solutions

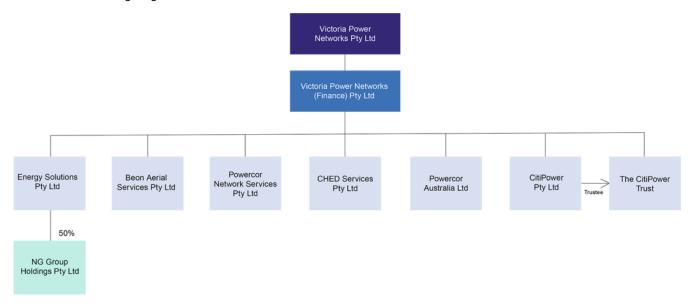
Beon Energy Solutions is a leader in the deployment of large-scale renewable energy and infrastructure projects, with extensive expertise in design, construction and maintenance. This includes an enviable track record of partnering with clients to reduce costs and project timelines, managing project risk and complexity, leading to faster commissioning without compromising safety and quality.

We have a significant focus on the deployment of renewable generation and supporting the delivery of Australia's energy transition. This experience includes the construction or connection of nearly 2 GW of renewable generation assets and the on-going operations & maintenance activities of numerous solar farms.

Beon's clients include some of the largest electricity utilities, infrastructure and renewable developers, commercial and industrial companies and transport network operators across Australia.

1.3 Corporate structure and reporting entities

The entities owned or controlled by VPN, all of which are Australian entities that are headquartered in Melbourne, are shown in the following diagram:



This modern slavery statement has been prepared and published in accordance with the *Modern Slavery Act* 2018 (Cth) for the calendar year ended 31 December 2023. It is a joint statement made on behalf of each of the following reporting entities:

- Victoria Power Networks Pty Ltd (ABN 37 116 940 820)
- Victoria Power Networks (Finance) Pty Ltd (ABN 68 101 392 161)
- CitiPower Pty Ltd (ABN 76 064 651 056)
- The CitiPower Trust (ABN 75 569 155 798)
- Power Network Services Pty Ltd (ABN 94 123 230 240)
- Powercor Australia Ltd (ABN 89 064 651 109).
- CHED Services Pty Ltd (ABN 14 112 304 622)
- Energy Solutions Pty Ltd (ABN 32 610 914 059)

This statement covers the activities of the reporting entities, along with the activities of entities owned or controlled by VPN. The non-reporting entities are:

- Beon Aerial Services Pty Ltd (ABN 39 639 114 257)
- NG Group Holdings Pty Ltd (ABN 24 607 658 293)

NG Group Holdings Pty Ltd is a joint venture that is 50% owned by the VPN group and 50% owned by unrelated third parties. All other members of the VPN group are 100% owned. The VPN group is currently considered to have control of the NG Holdings joint venture for the purpose of AASB 10 due to the financial support it has provided. The VPN group does not have day-to-day management control of the NG Holdings joint venture.

All references to our, we and us within this statement refer to Victoria Power Networks Pty Ltd and the entities it owns and controls.

1.4 Activities undertaken by each entity

Victoria Power Networks Pty Ltd is the holding company for the group.

Victoria Power Networks (Finance) Pty Ltd engages in corporate financing and financial risk management activities for the VPN group. This includes entering financing arrangements with entities outside the VPN group and providing financing arrangements to members of the VPN group.

The CitiPower Trust owns the CitiPower electricity distribution network, which is operated by CitiPower Pty Ltd as trustee of The CitiPower Trust.

Powercor Australia Ltd owns and operates the Powercor electricity distribution network.

Energy Solutions Pty Ltd, trading as Beon, conducts the Beon Energy Solutions business.

Power Network Services Pty Ltd provides electricity network services to CitiPower and Powercor, including in relation to customer projects, network development, asset maintenance and replacement and mobile generation.

CHED Services primarily provides corporate, strategic and IT shared services to CitiPower, Powercor and other entities in the VPN group. It also provides similar services to other utilities, such as United Energy and SA Power Networks.

Beon Aerial Services Pty Ltd has been established to create an internal capability to conduct airborne LiDAR surveys of electricity distribution networks.

NG Distribution Holdings Pty Ltd is the holding company for the Next Generation Electrical group, which provides engineering, procurement and construction services to deliver renewable energy solutions, such as solar farms, commercial rooftop solar and microgrids.

1.5 Board and management structure

The VPN Board of Directors oversees our strategic direction and performance and provides support to our Executive Management Team. The following committees have also been established to assist with the responsibilities of the Board:

- Audit Committee assists with financial reporting, maintaining an efficient system of internal control and promoting an ethical culture.
- Environmental Social and Governance assists the Board with oversight of Environmental, Social and Governance (ESG) and sustainability matters involving the VPN group.
- Risk Management and Compliance Committee responsible for reviewing the risk profile of the business and
 oversight of the risk management process, while ensuring appropriate procedures are in place to comply with
 legal obligations.
- Remuneration Committee reviews and makes recommendations on remuneration arrangements for our people.

The NG Holdings joint venture has a separate board that consists of directors appointed by each of the shareholders. The VPN group appoints two of the four directors, including the Chair. NG Holdings is managed by its management team, which does not include VPN representatives or employees.

VPN is managed by an executive management team, which is led by the Chief Executive Officer and consists of general managers and chief officers from each of our business units:

<u>Electricity Networks</u>: Our Electricity Networks business unit manages our network assets, including our control room. They also are accountable for planning and design of upgrades and augmentations to the electricity network.

<u>Network Services</u>: Our Network Services business unit is comprised of major projects, maintenance, field services, design, customer programs and delivery management.

Beon Energy Solutions: Beon is a leader is the deployment of large-scale renewable energy and infrastructure projects, with extensive expertise in design, construction and maintenance.

<u>Finance:</u> The Finance business unit is responsible for the financial management of VPN covering financial control, regulatory reporting, strategic financial planning, treasury, taxation and corporate risk and insurance.

<u>Corporate Services</u>: The Corporate Services business unit covers operational functions such as revenue management, procurement, commercial property and facilities management and payroll.

<u>People, Culture and Legal:</u> Our People, Culture and Legal business unit provides advice and services to support the achievement of our strategic objectives and living our values, including health, safety and environment; HR Operations and Recruitment; Legal; and Organisational Development.

<u>Corporate Affairs, Customer and Strategy:</u> Our Corporate Affairs, Customer and Strategy business unit is responsible for driving customer service improvement across the whole organisation and is the primary point of contact for our customers and electricity retailers. It is also responsible for delivering strategic initiatives (including Beon Aerial Services), managing business improvements and process documentation, maintaining ISO certification, providing change management and internal audit services.

<u>Information Technology</u>: Our IT business unit is responsible for the strategy, planning and delivery of information technology.

<u>Regulation</u>: Our Regulation business unit has two areas of responsibility: Regulation (which includes the regulatory reset and compliance), and Regulatory Strategy and Pricing.

1.6 People

As of 1st April 2024, our businesses employed 2,319 people:

CitiPower and Powercor 2,124Beon 149NG Holdings 46

We also engage supplementary labour from contracted labour hire agencies on an as-needs basis.

The number of employees working in each business unit is as follows:

Organisational Unit	Total Headcount excluding Supplementary Labour
VPN CEO and EA	2
Electricity Networks	109
Network Services	1393
Beon Energy Solutions	149
Finance	33
People, Culture and Legal	73
Corporate Affairs, Customer and Strategy	280
Information Technology	132
Corporate Services	81
Regulation	21
NG Holdings (joint venture)	46

Our people are located at 14 depots across central and Western Victoria, our Bendigo-based customer contact centre and our CBD headquarters, and in separate premises for Beon and NG Holdings.

1.7 Supply chains

We do not manufacture the products we use in our businesses. We buy them from suppliers, many of which purchase components from their own suppliers. We also buy services.

As of 31 December 2023, we have approximately 1,475 active suppliers, with 97.08% (based on their direct engagement business locations) located in Australia. The majority are in Victoria. The small number based overseas are located in Canada, China, Hong Kong, United Kingdom, New Zealand, Europe, Asia (excluding China and Hong Kong) and the USA.

The products we buy range from energy infrastructure materials (power cables, transformers, line hardware, poles, protective equipment, public lighting materials, solar panels, inverters, PV mounting equipment) to IT hardware, fleet and network associated consumables. Significant services include asset inspection, construction and maintenance, facilities management, solar services, traffic management, and IT and professional services.

We have measures in place to identify and reduce the risk of modern slavery in our supply chains. Our Supplier Code of Conduct is available via our website and contains requirements/expectations of suppliers to act against human rights abuses in the supply chains and commit to high ethical standards. The Supplier Code of Conduct applies to all suppliers engaged to provide goods or services.

In addition, tenders released to the market include a description of our position regarding the intent to comply with the Act and also detail the expectations of our supply chains to comply with the Act. Each tender requires tenderers who submit an offer to provide relevant information regarding their business practices, and how these support meeting our Supplier Code of Conduct including Modern Slavery requirements.

In addition to the above, when choosing the right suppliers, we take into account a range of non-price factors including safety performance, labour practices and values alignment, and supporting the communities in which we operate.

1.8 Our Progress since our last statement

This is our fourth modern slavery statement. We have continued to put a high focus on improving our knowledge of modern slavery and the associated risks within our supply chains.

We continue to abide by our **Sustainable Procurement Statement**, developed to ensure our suppliers are aware of our expectations and their requirements when it comes to delivering their goods and services. This includes labour and human rights expectations and minimum ethical, moral and corporate governance.

In 2023, we conducted our third supplier survey to understand how our suppliers are performing in relation to modern slavery obligations and the challenges they face. The survey response results have continued to improve since our first survey was released in 2021. We expect this is due to our suppliers' increased awareness of their modern slavery obligations. We have also seen an increase in the number of suppliers who have developed relevant internal processes and procedures to minimise and mitigate modern slavery risks in their own businesses.

We have also continued our ongoing collaboration with our energy industry peers to identify and address common challenges, as well as being an active participant in the Energy Procurement Supply Association (EPSA) group meetings. In addition, we have completed a review and subsequently reinforced our tendering schedules relating to Modern Slavery, to ensure tenderers provide sufficient information in their responses to allow us to make informed decisions regarding their internal processes. In 2023, we developed and conducted a modern slavery training program for relevant team members to raise the awareness of the risk of modern slavery across the relevant parts of the business. This program provided an opportunity for people to understand the process with regards to reporting suspected risks to the procurement of goods and services within the business. This program will be available for new team members joining the organisation as well as refresher training over the coming years for those who have already completed the training program.

Each year we also review and analyse our supply chain by category and the inherent risks to formulate a plan to control and/or mitigate the risks as best we can. All contracts also continue to contain anti-slavery and human trafficking requirements. Under these contracts, suppliers must include in its contracts with direct subcontractors and suppliers, anti-slavery and human trafficking provisions that are at least equivalent to the head contract.

2.Modern slavery risks in our operations and supply chain

VPN recognises that the greatest modern slavery risk exists from our external supply chains.

Again in 2023, we conducted a modern slavery risk-mapping assessment. The analysis was undertaken on our operational and supply chain procurement activities focusing on supplier expenditure by sector, risk and geography.

2.1 Industry risk

Based on supplier industry and expenditure, our top three key risk sectors continue to be classified as construction, electrical equipment and employment services – each of which has a unique risk profile.

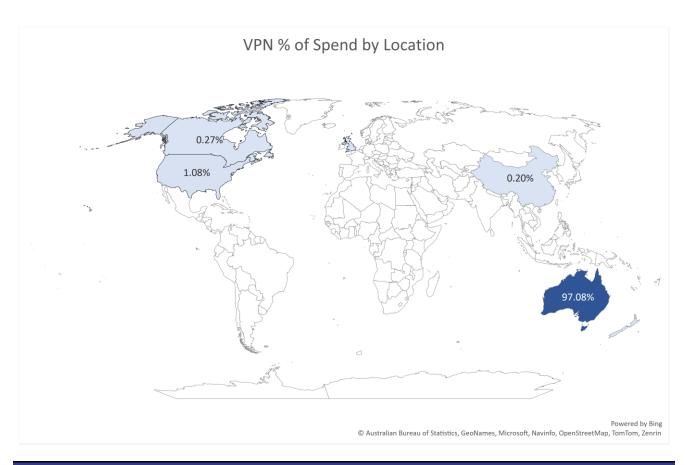
Construction and Engineering: The construction sector, which includes civil engineering companies and large-scale contractors, is characterised by large and complex international supply chains as well as local and overseas manual labour. This sector sources goods and materials which originates in countries or geographic regions with the potential of weaker working conditions and regulations.

Electrical Components and Equipment: This industry includes companies that supply electric cables and wires, electrical components, or equipment not classified in the Heavy Electrical Equipment sub-industry. Similar to construction, the electronics industry typically has long international supply chains for its raw materials manufacture and product assembly.

Human Resource and Employment Services: VPN typically sources these services from Australian companies with local labour contracts. While these services are typically lower risk in Australia, the direct impact on people means this sector carries an inherent modern slavery risk. Suppliers in this industry provide business support services relating to human capital management, including employment agencies, training, payroll and benefit support services, retirement support services and temporary labour hire agencies.

2.2 Geographic risk

Some countries have higher risks of modern slavery than others. As over 97% of VPN's suppliers are based in Australia (based on their direct engagement business locations), a nation with democratic governance, strong rule of law, minimal internal conflict and healthy economic development, the geographic modern slavery risks are reduced.



Country	% of Spend
Australia	97.08%
USA	1.08%
Europe	0.54%
New Zealand	0.41%
Canada	0.27%
China & Hong Kong	0.20%
United Kingdom	0.14%
Asia (excluding China & Hong Kong)	0.014%
Other	0.266%

3. Our ongoing approach to assessing and addressing modern slavery

3.1 Overview

VPN has undertaken various steps to understand and address the risk of modern slavery within our supply chain. We continue to focus our efforts on programs which will provide a foundation for further initiatives and deliver longer-term outcomes. These include:

- **Policy** Continued review of existing policies and procedures, including our Procurement and Purchasing Policy, to ensure the most up to date requirements associated with Modern Slavery laws are included for the consideration of modern slavery risks, particularly when tendering and selecting suppliers. We have also included principles of sustainable sourcing and procurement.
- Contract terms In October 2019, we amended all procurement contracts and standard purchase order terms to
 include anti-slavery and human trafficking clauses and have included these terms in all applicable standard form
 contracts entered since 2021. These clauses require our suppliers to tell us as soon as they become aware of
 any actual or suspected slavery or human trafficking in their supply chain, and to require the same of their
 suppliers. In addition, any contracts entered into before this date are reviewed at the time of contract variance, to
 ensure that anti-slavery and human trafficking clauses are added into the contract variation. This process has
 continued throughout 2023.
- Supplier risk assessment During 2023 we conducted detailed risk assessments with a particular focus on geographic location, industry sectors and the products and services supplied to us (refer section 2 for the details).
- Supplier modern slavery self-assessment Following our second modern slavery supplier survey in 2022, we undertook our third supplier survey to assess each supplier's understanding and compliance with modern slavery requirements. The survey results demonstrated a strong compliance with modern slavery legislation and continued improvement in understanding and awareness of our supplier requirements on themselves and their supply chains. The latest results show that suppliers continue to increase their visibility of the risks in their supply chains and implement measures to further improve their behaviours and processes. We have increased the supplier target audience, by including high and medium risk suppliers which represent over 85% of our supply chain spend.
- Training Delivered modern slavery training to our procurement team and other relevant team members to raise
 awareness and knowledge of modern slavery risks, our responsibility to mitigate those risks and report on our
 progress as well as how to address these concerns if identified. In excess of 500 employees have successfully
 completed this training.
- Encouraging reporting We are committed to creating and maintaining an open and honest working environment where people employed by us or our suppliers, and their families, can raise concerns about suspected law breaches, our policies and procedures, as well as our Code of Conduct. This includes raising concerns about modern slavery. We encourage reporting of wrongdoing by providing a convenient, safe and independent reporting mechanism, and protection for people who make a disclosure.

VPN continues to work on a new 'source to contract' solution to ensure it meets our requirements in driving greater supplier compliance and improving our ability to review and manage supplier performance. The solution, called Felix, will also assist with regards to our tendering processes and supplier pre-qualification. The system is on track to being implemented within the VPN business by the end of 2024.

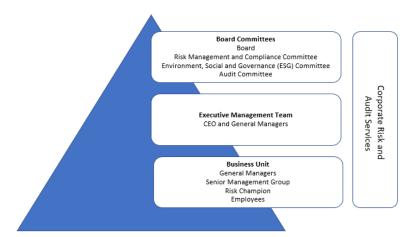
3.2 Corporate Governance

The **VPN Board** has overall responsibilities for the corporate governance and strategic direction of the VPN Group. Its responsibilities specific to the management of modern slavery include:

- Compliance with the Code of Conduct;
- Ensuring that significant risks facing the Group have been identified and that appropriate and adequate control, monitoring, accountability and reporting mechanisms are in place.

VPN has established a number of **Committees** to assist the Board in the execution of its duties. The Risk Management and Compliance Committee oversees and makes recommendations to the Board on VPN's risk profile and ensures appropriate policies and procedures are adopted.

The Committee also assists the Board with its responsibilities to oversee compliance statute and regulations.



3.3 Risk management

Risk management is an integral part of our business. It is reflected in policies, systems and processes, including in our strategic planning process, performance management and overall governance.

The business uses an "Enterprise Risk Management" approach to provide a comprehensive and consistent process to manage and report on business risk exposures through identification of strategic, operational and emerging risk, determining accountability for those risks, assessment of controls and the control environment and ensuring that there are adequate resources to manage the risks.

The business has a formal Enterprise Risk Management Framework that is consistent with the International Standard for Risk Management (AS/NZS ISO 31000:2018) and includes six-monthly reviews of business risk exposures.

The framework ensures structures are in place to facilitate effective risk identification, analysis, monitoring and reporting. Regular reporting to the Board via the Risk Management and Compliance Committee is also a key component of the framework.

The Executive Management Team (EMT) has executive oversight of risk management throughout the business. The Corporate Risk Team present to the EMT members on a regular basis on the results of the risk profiling.

The risk of modern slavery was formally incorporated into our Enterprise Risk Framework in 2021.

3.4 Operational due diligence

We continue to take a proactive approach to modern slavery due diligence internally by creating a positive culture where our people are comfortable speaking up and are aware of their rights. Our policies and procedures (listed below) provide guidance and clear information to our employees about their rights and responsibilities.

Leaders across our business are encouraged to be aware of and be vigilant around instances of modern slavery within our workforce. This includes both employees and contractors. We support and comply with Australia's strong workers' health and safety legislation which acts as a mitigating factor to modern slavery risks within our workforce.

3.5 Policies and procedures

In addition to our governance structure set out above, we maintain and implement a range of policies and procedures to mitigate modern slavery risks in our operations and supply chains. These include our:

Health and Safety Policy - the health and safety of our employees, contractors, customers and the community is our highest priority. Supporting and complying with Australia's strong workers' health and safety legislation also acts as a mitigating factor to modern slavery risks within our workforce and supply chain.

Procurement and Purchasing Policy - provides direction on ensuring the procuring and purchasing of goods and services meet regulatory, business and governance requirements.

Supplier Code of Conduct – outlines ethical standards in behaviours that suppliers, as partners, will aim to meet when conducting business with CitiPower and Powercor.

Whistleblower Policy - aims to encourage reporting of wrongdoing that is of a legitimate concern by providing a convenient and safe reporting mechanism and protection for people who make a disclosure. This policy is for use by our employees or contractors and their families, our suppliers and their families.

Employee Handbook Code of Conduct - provides guidance to our employees on our company values, code of conduct, relationships with suppliers, and reporting a concern.

Enterprise Risk Management Policy and framework - enables key stakeholders to understand and respond to the risks that may affect business objectives, effectiveness, and efficiency.

Supplier compliance - administered through the insertion of an anti-modern slavery clause in our contracts and purchase order standard terms.

3.6 Training

The CitiPower and Powercor procurement team and other relevant team members throughout the business, have undertaken Modern Slavery Act training to reinforce the key objectives of the modern slavery risk management framework. The training was conducted in November 2023 and included the broader human rights agenda, taking into account, key human rights issues within the energy services sector and an overview of VPN process and documents. In excess of 500 employees have successfully completed this training. This training will continue to be updated to reflect ongoing amendments to the Act. It will also be available on an annual basis for any new starters within the Procurement Team and other related teams throughout the business. It will also be available as refresher training for any team members wishing to receive a refresh of the information provided.

Our objective with regards to this training, now and into the future, is to encourage sustainable procurement and responsible sourcing practices of network materials, so they are fit-for-purpose and have a low environmental impact when manufactured and in use in our networks.

4. Measuring our effectiveness

We continue to be committed to measuring the effectiveness of our modern slavery risk management.

Throughout 2023, we continued to focus our attention on risk identification and management processes, continuing to build employee awareness and knowledge through training. We also continued to review and revise our relevant policies and procedures to ensure they support our management of modern slavery risks and are in line with the requirements of the Modern Slavery Act.

Throughout 2023, we had no confirmed cases of modern slavery instances raised for remediation in our supply chain. In the event we identify an instance of modern slavery within a specific supplier's operations or supply chain, we will work with that supplier to remediate the issues and risks identified in our assessment. When we can't achieve a satisfactory resolution, we will implement other measures, including terminating our relationship with the supplier.

Our Whistleblower Program provides an effective mechanism for reporting and escalating any issues of concern to employees of us or our suppliers, or their families, and we are committed to maintaining an environment where legitimate concerns can be reported without fear of retaliatory action or retribution, and anonymously if required.

5.Stakeholder engagement and consultation

The content of this statement applies to all entities owned and controlled by Victoria Power Networks Pty Ltd. As the directors of Victoria Power Networks Pty Ltd are also directors of each other reporting entity in the group, and the group is managed by a single executive management team, uses the same policies and processes, and shares many of the same suppliers, we have provided a single consolidated description of our actions to address modern slavery risks and this statement has been prepared on a 'whole of group' basis.

The working group that co-ordinated preparation of this statement included representatives from our procurement, sustainability, corporate affairs and legal teams and received input from each of our operating businesses, our risk team and our executive management team.

Consultation was undertaken at Board level through presentations to and feedback from the Environmental, Social and Governance (ESG) Committee and consideration and approval of this statement by the VPN Board.

This statement was approved by the Board of each reporting entity (or in the case of The CitiPower Trust, the board of its trustee) on 4 June 2024.

6.Additional information

In 2021 and 2022 we had a significant task of increasing our knowledge of modern slavery and improving our visibility of supply chain risks. In 2023, we undertook and implemented the following activities:

- 1. Deployed training with the relevant groups across the company resulting in a raised awareness regarding modern slavery and what to do and how to identify a modern slavery event.
- 2. Conducted our third modern slavery supplier survey across suppliers in our higher risk areas.; and
- 3. Re-evaluated our risk assessments for all categories of supply.

In 2024, we have plans to:

- 1. Continue to work on a new 'source to contract' solution to ensure it meets VPN's requirements in driving greater supplier compliance and improving our ability to review and manage supplier performance. The solution called Felix will also assist with regards to our tendering processes and supplier pre-qualification. The system is on track to being implemented within the VPN business by the end of 2024.
- 2. Continue relevant team engagement and upskilling about modern slavery in our supply chain.
- 3. Provide Modern Slavery training for all new team members who join the procurement team as well as ensuring refresher training is available for the existing team.
- 4. Continually look to re-evaluate our risk assessments for all categories of supply.
- 5. Complete a comprehensive Modern Slavery Audit on 5-7 of our Strategic suppliers' base approx. 10%.
- 6. Survey our suppliers on what they are doing to reduce the risks of modern slavery in their business and supply chain.

