



SGSPAA GROUP

Modern Slavery Statement

2025



About this Statement

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (“the Act”) by the reporting entity SGSP (Australia) Assets Pty Ltd (ABN: 60 126 327 624) (“SGSPAA”) and its 38 wholly owned subsidiaries (collectively, “our Group”) for the year ended 31 December 2024. Our Group’s registered office is Level 16, 567 Collins Street, Melbourne, Victoria. SGSPAA makes this single joint statement on behalf of all reporting entities in our Group¹. All subsidiaries are incorporated in Australia and 100 per cent of their share capital and units issued are owned by our Group, a list of which can be found in SGSPAA’s Financial Report for the year ended 31 December 2024². This statement outlines the actions our Group has taken to assess and address modern slavery risk. It has been prepared with consultation and engagement across our Group as a whole.

Our Group holds a 50 per cent interest in the ActewAGL Distribution Partnership (ABN 76 670 568 688), primarily operating as “Evoenergy”, and a 34 per cent interest in United Energy Distribution Holdings Pty Ltd (ABN 15 104 381 660). These entities are not controlled by our Group and therefore are not covered by this statement.

This statement was approved by the board of SGSPAA on 5 June 2025.

For more information about this report contact Corporate_Affairs@jemena.com.au.

For more information about our Group visit www.jemena.com.au.

What is Modern Slavery?

The term modern slavery is used to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine or deprive them of their freedom. This can include one or more instances of trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour³.

This statement describes the risks of modern slavery in our operations and supply chains and the actions we have taken to identify and address those risks.

¹ Other Group reporting entities: Jemena Eastern Gas Pipeline Holdings Pty Ltd (ABN: 96 083 051 905), Jemena Electricity Networks (Vic) Ltd (ABN: 82 064 651 083), Jemena Gas Networks (NSW) Ltd (ABN: 87 003 004 322), Jemena Gas Pipelines Holdings Pty Ltd (ABN: 72 127 203 650), Jemena Limited (ABN: 95 052 167 405) and Zinfra Pty Ltd (ABN: 98 156 517 305).

² Source: [SGSPAA Financial Report for the Year Ended 2024](#)

³ Source: [Commonwealth Modern Slavery Act 2018 - Guidance for reporting entities](#)



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Message from our Chairman and Managing Director

Over 2024, our Group has strived to embed modern slavery considerations into everyday processes. Our participation in a global economy means the need for strong, resilient and ethical supply chains has never been greater. Coupled with evolving stakeholder expectations and the increasing spotlight on environmental, social, and governance (ESG) standards, assessing and addressing modern slavery remains a focus area for our Group.

Over the past year, our efforts have shifted from foundational awareness-building to maturing our program across the business, including working with our Tier 1 suppliers to better understand their own supply chains and potential risks.

As part of our Modern Slavery Action Plan, we completed a targeted audit of a supplier operating in a high-risk industry, discussed on page 11 of this statement. This was conducted using a collaborative, solutions-oriented approach, with the goal of identifying and remediating potential issues, in particular when using components and goods sourced offshore. This audit has informed our broader supplier engagement strategy and improved our audit methodology moving forward.

We have now completed year one of a multi-year partnership with Fair Supply, a leading platform in supply chain risk analysis. This partnership has enabled us to conduct deeper, data-driven analysis of our supply chain exposure across categories and geographies. We are beginning to identify trends that will help us better anticipate, mitigate and monitor risks, and we will continue using this intelligence to guide our actions.

Our involvement with the Energy Procurement Supply Association (EPSA) remains a valuable part of helping us to understand and mitigate modern slavery risk, while also allowing us to exchange knowledge and coordinate responses to shared risks across the energy sector.

In anticipation of proposed changes to the Act released in a response by the Australian Government in December 2024, we are proactively reviewing our Modern Slavery Program to ensure continued compliance with the Act. We are also supporting our suppliers – many of whom are on their own modern slavery compliance journey – by providing practical resources, training and guidance to strengthen their awareness and capacity.

Through these initiatives, we continue to build a culture that values human rights, transparency and accountability, within our business and throughout our supply chain.

Welcome to our Modern Slavery Statement 2025, which outlines our approach, achievements and ongoing commitment to tackling modern slavery risks across our operations and our supply chains.



Jiang Longhua
Chairman

A stylized handwritten signature in black ink.



David Gillespie
Managing Director

A stylized handwritten signature in black ink.

Our Structure and Operations

Our Vision

Creating sustainable energy solutions with communities

We're Owned By ⁴



Our Brands Are:



with additional interests in ActewAGL (EvoEnergy), United Energy and other minority investments

Our Operations

- We are a leading energy infrastructure group with a portfolio of assets valued at \$12.9 billion.
- Under the Jemena brand, we own and operate some of Australia's most significant gas distribution and transmission assets. We supply gas to over 1.5 million homes and businesses across Sydney and parts of New South Wales through our distribution network. Our gas transmission pipes connect major gas supply hubs powering industries across the nation. Additionally, we manage the electricity distribution network that serves more than 370,000 customers in Melbourne's north-west.
- Through our engineering, design, construction, commissioning, maintenance and emergency response services company, Zinfra, we are shaping the future of Australia's energy system by partnering with leading energy companies nationwide.
- With a workforce of 3,274 employees spread across Australia—including Sydney, Melbourne, Brisbane, Tasmania, Western Australia, Tennant Creek in the Northern Territory and Mount Isa in Queensland—we are committed to delivering reliable energy solutions. Our Group holds equity interests in ActewAGL (Evoenergy) and United Energy and is backed by our shareholders, Singapore Power and State Grid Corporation of China.

Our Scale in 2024

\$330
million net profit after tax

\$256
million total tax paid*

\$557
million capital expenditure

\$987
million operational maintenance and capital improvements

\$676
million in employee benefits

*total tax paid for CY 2023. 2024 income tax return to be lodged in July 2025

⁴ SGSP (Australia) Assets Pty Ltd (SGSPAA), trading as Jemena is 60% owned by State Grid Corporation of China and 40% by Singapore Power.

Our Locations and People

Zinfra & Jemena

Jemena employees	1,034
Zinfra employees	2,240

Female, Male
and Not Disclosed

Male	2,559
Female	710
Not specified	5

Full-time, Part-time
and Casual

Full-time	3,184
Part-time	81
Casual	9

Permanent
and Temporary

Permanent	3,021
Temporary	253

Gas/Electricity

1 ActewAGL Distribution Partnership (50%)

Gas

- 2 Atlas Gas Pipeline
- 3 Atlas Gas Processing Facility
- 4 Colongra Gas Transmission and Storage Pipeline
- 5 Darling Downs Pipelines
- 6 Eastern Gas Pipeline
- 7 Jemena Gas Network
- 8 Northern Gas Pipeline
- 9 Phillip Creek Compressor Station
- 10 Mount Isa Compressor Station
- 11 Queensland Gas Pipeline
- 12 Roma North Gas Processing Facility
- 13 VicHub

Electricity

- 14 Regulated Electricity Network
- 15 United Energy Distribution (34% Group ownership)

Renewable Gas Demonstration Projects

- 16 Western Sydney Hydrogen Hub
- 17 Malabar Biomethane Injection Plant

Zinfra Operations

- 18 Zinfra Operational Locations



Our Governance and Policy Framework

A robust governance and policy framework underpins our Group’s efforts to prevent and minimise modern slavery risks within our operations. These outline how we manage our people, as well as the actions and behaviour expected of them when dealing with and appointing suppliers. The framework reflects our values –

We Care, Think Like a Customer, Better Together, Be Accountable and Find a Better Way.

This suite of policies and procedures is regularly under review to ensure the effectiveness of this process. They are kept up to date and reviewed to align with any identified improvements or regulation changes, and are also accessible to all of our contractors and suppliers, based on the pathway through which we engage them, to ensure we are working together to identify, assess and address modern slavery risks. This review forms part of our Group’s strategic planning and risk management processes, in which modern slavery is expressly included at an enterprise level. It builds a strong link to Environmental, Social and Governance (“ESG”), strategy and risk management, which guides our Group in continuous improvement and due diligence beyond governance and policy.



We care

We value safety and wellbeing for ourselves, our community and environment



Think like a customer

Our actions consider our customers, community, and other stakeholders



Better together

We value the diversity of our people, working together to achieve great outcomes



Be accountable

We accept responsibility to deliver our commitments



Find a better way

We find improved and innovative ways to work

Code of Conduct

Our Group Code of Conduct explains the standard of behaviour expected to be upheld at all times and is in keeping with our values and relevant laws and regulations. The Code applies to all employees, contractors and suppliers across our Group and is a demonstration of our commitment to caring for the people both in our operations and across our supply chains. Training in our Code of Conduct is mandatory for all our people.

Whistleblower Policy

Our Group is committed to a culture of corporate compliance, good corporate governance, and ethical behaviour. Our Whistleblower Policy protects people who wish to raise concerns about actual, suspected, or anticipated unlawful or unethical behaviour relating to our Group.

Procurement & Contract Management Policy

Our Group is committed to delivering maximum sustainable value through our supplier relationships. As guided by our Procurement & Contract Management Policy, the core purchasing principle that underpins our practices is to conduct procurement activities with the highest integrity, in line with our Group’s Code of Conduct. The policy is in line with our commitment to tackling modern slavery risks throughout our supply chains.

Payment Times Reporting Scheme

Our Group actively identifies small businesses in our supply chain, and reports on the associated payment times to ensure we are committed to good practice in procuring goods and services. Results are submitted to the Regulator as required under the Payment Times Reporting Scheme, intended to help small businesses’ cash liquidity and ability to operate.

Group Environment, Social and Governance (ESG) Plan

Our Group’s ESG Plan provides a way to communicate our commitments and planned actions to improve environmental, social and governance outcomes as we work towards a more sustainable future, and maintaining our culture of acting lawfully, ethically and responsibly. The plan identifies our Modern Slavery Action Plan as a critical ESG program for our Group to detail how we are tracking modern slavery risk across our operations and supply chains.

Our Journey and Consultation across our Group

The Modern Slavery Working Group is comprised of members from across the Enterprise Procurement, Corporate Affairs and Legal teams, with a key focus on developing and delivering our Modern Slavery Program. The Enterprise Procurement team monitors and tracks the activities, including progress updates to our leadership team and the wider enterprise.

In 2024, the following key deliverables were undertaken to advance awareness, and ensure our people recognise the roles and responsibilities in identifying, assessing and addressing modern slavery risk:

- 1. Completed year one of a multi-year partnership with Fair Supply, cross-collaborating with our Group’s Environment and Sustainability team to enhance our supply chain risk profile visibility.
- 2. Continued embedding the Modern Slavery Action Plan within the broader Group ESG Plan.
- 3. Delivered targeted modern slavery education through e-learning modules, procurement in focus sessions, and training materials for all employees and people leaders across our Group.
- 4. Connected to our operations and employees through toolbox talks and fields audits.

2020
Identify



2021
Develop



2022
Engage



2023
Expand



2024
Evaluate



2025
Evolve



Our Supply Chain

In 2024, our Group continued to apply established due diligence practices to identify, assess and address modern slavery risk within our supply chains. Given the highly regulated nature of our business, and Australia's low country risk, the assessment of our internal operations remains at low risk.

A key focus was to expand our supply chain visibility and the extensive tiers we engage. After completing year one of a multi-year partnership with Fair Supply, we have increased the transparency of our supply chain risk profile. This traceability drives our due diligence activities with the ability to assess and address modern slavery risk throughout the extensive tiers of suppliers we engage. This mapping exercise will continue in 2025 to maintain insight into our supply chain profile and risk visibility.

The result has been the evolution of our key supply chain risk categories and understanding the supply chain profile across the diverse mix of industries, countries and tiers we engage:

Geographical view of our supply chain: Active Tier 1 suppliers in 2024

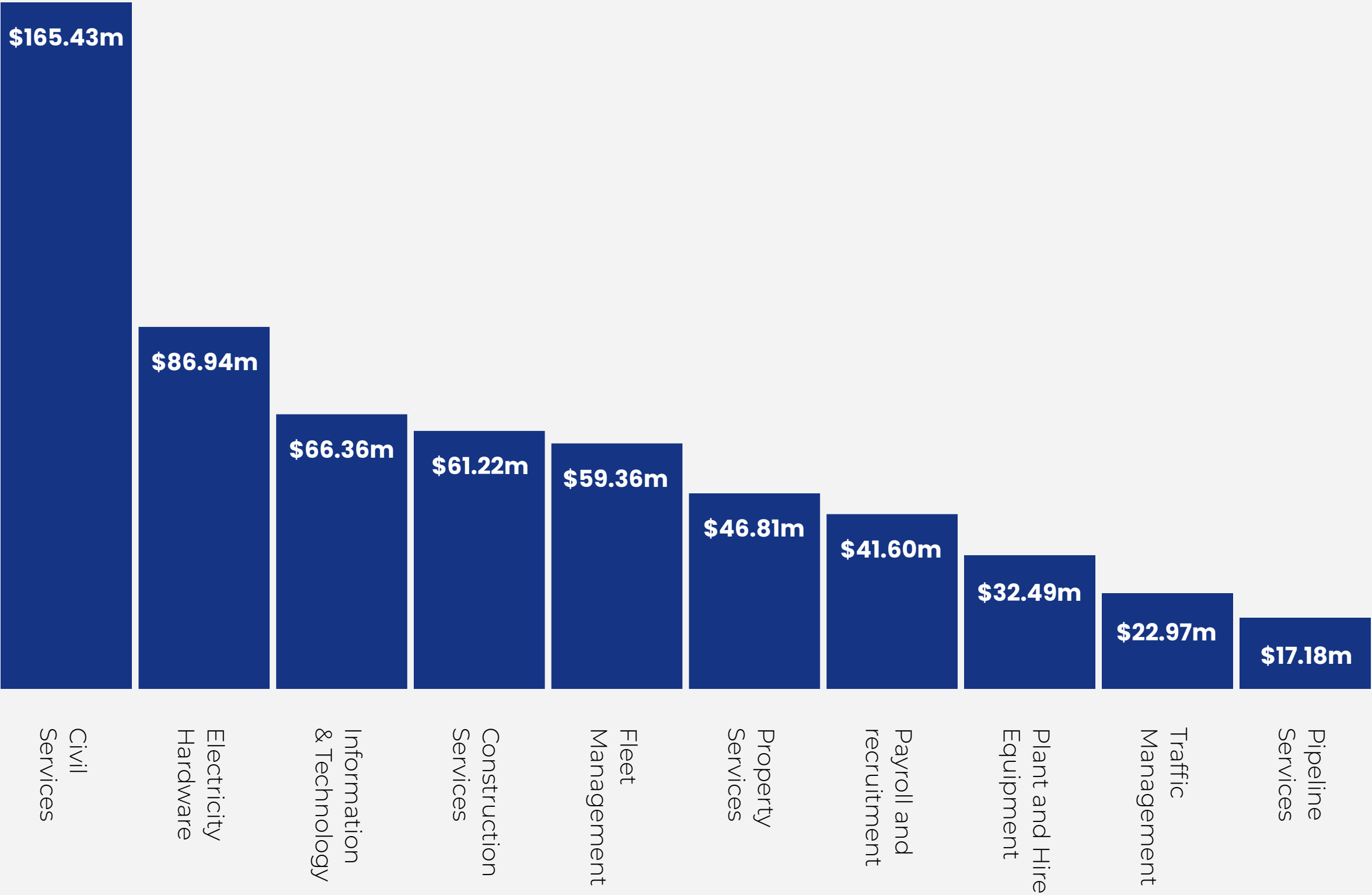


Key Risk Categories

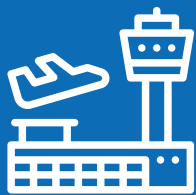
Through engagement with over 3,900 active suppliers, our Group has identified several top spend categories in 2024. These categories are classified across the following range of business streams:

- Asset Maintenance and Services
- Corporate and Professional Services
- Digital and Technology
- Equipment and Materials

Below are the Top 10 spend categories for our Group in 2024:



A key activity in our 2024 action plan was to re-evaluate our key risk categories to consider the extensive tiers of suppliers we engage:

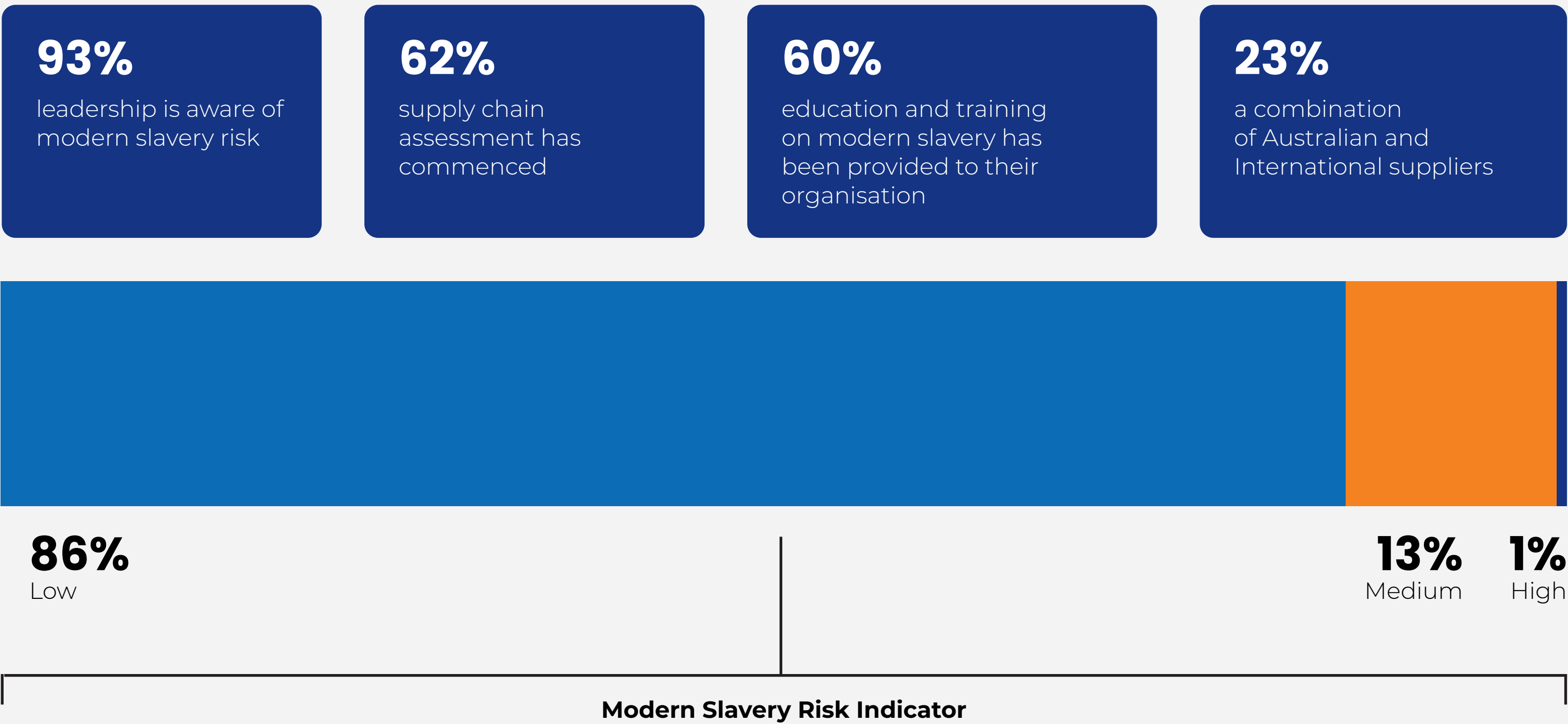
Construction Services 	Travel & Accommodation 
Oil & Petroleum 	Professional Services 
Civil Services 	Property Services 
Safety Equipment & Workwear 	Information & Technology 
Electricity Hardware 	Logistics 

Supply Chain Risk Profile

Our Group has continued to partner with Informed 365 to issue Supplier Assessment Questionnaires (“SAQ”) to routinely capture supplier information and keep us apprised of emerging modern slavery risks. The platform, in concert with the Energy Procurement Supply Association (EPSA), has driven our collaboration with energy sector peers, upholding visibility and promptly detecting instances of modern slavery across our supply chain.

To date, a total of 1,005 SAQs and 1,872 sanction checks have been completed across our active supplier base (over 3,900 Tier 1 Suppliers). These responses measure how our suppliers are progressing and provide insights into their Modern Slavery Programs and supply chains.

In 2024, our suppliers said:



Weaving best practice

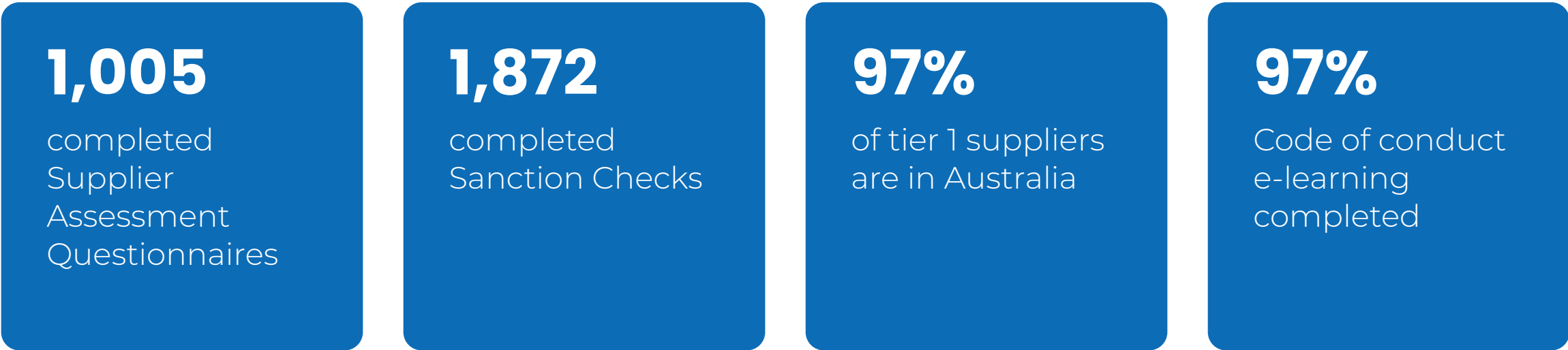
A key focus of our Modern Slavery Program was to strengthen the connection with our operations. The Safety Equipment & Workwear category emerged as a focal point for our Group in 2024, and a deep dive into the modern slavery journey of a supplier in this category was planned. We committed to physically assessing a supplier relationship, focusing on their capability to identify, assess and address modern slavery risks.

We recently appointed Stewart & Heaton as our Personal Protective Equipment (PPE) supplier, forging a strong partnership to grow together, educate ourselves and share insights. A key aim was to assess the key operational locations for Stewart and Heaton and review the conditions and environments. After working groups were established for both parties, we engaged industry to develop our practices and identify areas of focus for the audit.

Following a thorough review of the key field locations, we were comfortable that the observed operational practices were in line with Stewart & Heaton’s governance and policy framework. Stewart & Heaton also demonstrated a robust suite of procedures to manage modern slavery risk throughout their services and across the suppliers they engage. In addition, the collaboration was another successful outcome and provided us with valuable considerations to embed within our own Action Plan.

The learnings from this audit will inform our Modern Slavery Physical Audit Program to continue rolling out the process to additional supply chain categories.

Our Actions to Assess and Address Risk



Working with the Energy Procurement Supply Association

Our continued engagement with the Energy Procurement Supply Association (“EPSA”) has allowed our Group to share and evolve our modern slavery journey. Working closely with energy industry peers means we understand emerging risks and address the growing domain of modern slavery as an industry.

Our work with EPSA targeted the redevelopment of our long-form SAQ, following feedback from our suppliers. While the questionnaire generated valuable insights, our suppliers highlighted the detail required to complete specific sections. This review took place across all areas of the questionnaire, reducing the time-taken to complete questionnaires and improving supplier engagement. As a result, a streamlined SAQ within the Informed 365 platform was delivered.

Modern Slavery Working Group and Action Plan

In 2024, our Modern Slavery Working Group informed the key targeted initiatives that drove processes, communication and innovation in our Modern Slavery Program.

The Working Group includes representatives from across the business and continues to be supported by our Managing Director and Executive Leadership Team.

The Modern Slavery Action Plan’s progress has been tracked alongside our Group’s ESG strategy, culminating in the delivery of our annual Modern Slavery Statement.

Appointment of Governance and Sustainability Manager

A key initiative identified through the Modern Slavery Action Plan is the appointment of a Governance and Sustainability Manager. This role coordinates ESG Programs across Procurement, and ensures tackling modern slavery risks is at the forefront of our journey.

Modern Slavery Actions and Next Steps

Our Group’s Modern Slavery Action Plan outlines activities underpinned by our six key phases - Commit, Assess, Adapt, Address, Track and Communicate.

ACTION	WHAT WE COMMITTED TO	WHAT WE COMPLETED IN 2024	NEXT STEPS IN 2025
Commit 	• Fully implement Fair Supply ESG risk management and compliance platform for Modern Slavery, Emissions and Scope 3 reporting. • Complete supply chain mapping including industry tiering to level 10 to identify risks. • Enhance our capability, influence and focus with a dedicated Responsible Sourcing Manager.	• Implemented the Fair Supply platform across the 2022, 2023 and 2024 calendar years to analyse modern slavery risk across multiple reporting periods. • Delivered full supply chain mapping and industry tiering to level 10 across Modern Slavery, Biodiversity and Scope 3 reporting. • Appointed a Governance and Sustainability Manager to coordinate and drive the Modern Slavery Program across the enterprise.	• Update supply chain mapping information with 2025 spend information for Modern Slavery, Biodiversity and Scope 3 modules. • Analyse mapping results and incorpoprate key findings into future procurement activities.
Address 	• Review the <u>30 recommendations from the 2023 Modern Slavery Act review</u>. • Review our supplier onboarding practises including screening and pre-engagement assessment.	• Hosted a “Procurement in Focus” session for our Group to share updates on modern slavery process and updated procurement resources. • Updated our Group Procurement and Contract Management Policy to capture ESG and commit to delivering economic and social benefits through supplier relationships.	• Continue to review and update our supplier onboarding practices. • Update training and focus sessions schedule to uplift business awareness and knowledge.
Assess 	• Engage with the EPSA consortium and industry experts to gain risk insights and best practice methods to address modern slavery. • Focus on supplier relationship management and collaborating with suppliers to inform, support and guide on modern slavery. • Assess supply chain tier risk report produced by Fair Supply to provide industry focus areas.	• Collaborated with the EPSA consortium to continue developing best practice methods around the SAQ process to better support businesses in completing the questionnaire, and reducing the time investment required. • Performed a modern slavery physical audit with a high risk industry supplier to explore gaps and opportunities in their modern slavery program. • Reviewed high risk industries and identified new focus areas through Fair Supply, based on yearly spend analysis and supply chain mapping.	• Develop a modern slavery physical audit program for our Group’s key suppliers. • Target 2 high risk industry suppliers in 2025 for the modern slavery physical audit program. • Continue engaging the EPSA consortium and industry experts to leverage key relationships and mature our Modern Slavery Program.

ACTION	WHAT WE COMMITTED TO	WHAT WE COMPLETED IN 2024	NEXT STEPS IN 2025
Track 	- Continue the review and implement of our Group ESG Plan including our procurement activities. - Continue SAQ and sanction checking practises as part of our supplier due diligence regime.	- Continued embedding the Modern Slavery Program into our Group ESG Plan to ensure our Action Plan is recognised across the enterprise in addressing environmental, social and governance targets. - Completed 255 SAQs and sanction checks in 2024 across our active supplier base. - Developed a dashboard to monitor the progress and tracking of the Modern Slavery Program in real time.	- Maintain SAQ and sanction checking practices as an integral part of our supplier due diligence process. - Enhance our Group's modern slavery dashboard with new reporting analytics to support communication to the business on Action Plan progress and increase visibility. - Report on the progress of our Modern Slavery Program for our Group ESG Plan.
Adapt 	- Monitor the outcome of the 2023 Modern Slavery review and update our program to incorporate any improvements and/or new legislative requirements. - Evaluate our supplier segmentation process utilising the Global Slavery Index and Edge Impact's Modern Slavery industry risk ratings.	- Observed the results of the Modern Slavery Act review, and identified future optimisations for our Modern Slavery Program to better address any potential modifications to the Act. - Reviewed and updated our modern slavery eLearning training package to capture developments in our Modern Slavery Program, and continue raising awareness across our Group.	- Leverage Fair Supply results as part of our supplier segmentation process to support the identification of modern slavery risk. - Continue to support small business in their understanding of modern slavery and supply chain risks.
Communicate 	- Revamp our internal modern slavery intranet pages including resources and content. - Refresh our Group's training schedule and incorporate program updates to ensure our employees are informed on the latest requirements and activities.	- Implemented updates to our internal modern slavery intranet page, introducing better resources for market engagement activities and supplier relationship management. - Developed and submitted our Group's 2024 Modern Slavery Statement. - Published an external training module for suppliers and contractors to share information and ways of working collaboratively to address modern slavery risks in their supply chain.	- Update our Group's Modern Slavery Action Plan and education materials in light of the 2023 Modern Slavery review recommendations. - Continue to identify partnerships across our Group for the Modern Slavery Program.

Program Effectiveness

ACTION	DESCRIPTION	OUTCOME
Modern Slavery Working Group	Meeting with the Modern Slavery Working Group to coordinate the delivery of several Action Plan initiatives, ensuring we meet out reporting commitments, and address any perceived, suspected or apparent instances of modern slavery.	Our Group published key resources and updated existing documentation to maintain awareness of Modern Slavery risk in operations and supply chain.
Our Industry	- Engagement with industry bodies and peers, particularly EPSA, to collaborate and communicate learnings and insights in relation to modern slavery risk. - Attending events hosted by WorldCC, Procurious, The Faculty, EPSA and PASA matured our knowledge-base of best practice methodologies and provided an opportunity to share our journey and maturity.	Industry engagement led to opportunities to grow our understanding modern slavery risk and identifying any opportunities for improvement.
Internal Processes	- Providing progress updates of our Modern Slavery Program to our Group’s leadership team. - Information captured in Informed 365 through our updated SAQs, together with sanction checking, has supported us in understanding if we are exposed to any emerging risks. - Supply Chain mapping through Fair Supply provided visibility of the many tiers that our supplier base presents.	- We improved our tracking and monitoring of our program, allowing for greater visibility of our progress. - A combination of processes allowing our Group to continue our connection to suppliers via the SAQ, while exploring the lower levels of our modern slavery risk through supply chain mapping.
Our Suppliers	Open and consistent communication with key suppliers has improved our understanding of their wider supply chains and the risks they may perceive.	- We organised and delivered a modern slavery physical audit with a key supplier, which is a step towards developing our Group’s Modern Slavery Audit Program. - Our Group also developed and published an external modern slavery training pack to continue refining our ways of working with suppliers.
Assessment of our program of work	Routine reviews of our key modern slavery activities have supported us to remain aware of emerging risks, and make changes as required.	Our Group has prepared our Modern Slavery Program to adapt all reviewed Modern Slavery Legislative changes, and has identified imminent opportunities for improvement.
External Reporting	Developing key reporting metrics to benchmark responses, sanctions and supply chain mapping to identify gaps and opportunities for improvement.	We continued to deliver our due diligence activities, leveraging our mix of modern slavery tools and processes to mature our program.

