

Energy Queensland Group Modern Slavery Statement

2024 - 2025



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Energy Queensland acknowledges the traditional custodians of the land on which we live and work, and recognise their continuing connection to land, waters, and community. We would also like to pay our respects to Elders past and present for they hold the memories, the traditions, the culture and hopes of First Nations people. We also acknowledge that the lands and waters beneath the poles and wires that stretch across the communities where we live and work, was and always will be traditional Aboriginal and/or Torres Strait Islander land.

About this Statement

This Modern Slavery Statement has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

This is the sixth joint Modern Slavery Statement made by Energy Queensland Limited and its wholly owned subsidiaries Energex Limited, Ergon Energy Corporation Limited, Ergon Energy Queensland Pty Ltd and Yurika Pty Ltd (the EQL Group).

As the EQL Group use the same policies and processes, operate in the same sector, and share many suppliers, this Statement provides a consolidated description of the actions taken to assess and address the risk of modern slavery in the operations and supply chains of the EQL Group for the financial year ending 30 June 2025.

This, and our earlier Modern Slavery Statements, can be found on the Modern Slavery Register at <https://modernslaveryregister.gov.au>

Our structure, operations, and supply chain

Energy Queensland is Australia's largest, wholly Government-owned electricity company, comprising Energex and Ergon Energy Network, Ergon Energy Retail and Yurika (as shown in **Figure 1**).

The EQL Group was created in 2016, from a predecessor history of over 100 plus years of experience in electricity retailing, distribution, transmission and generation.

Our shareholding Ministers, on behalf of the Queensland community, are the Treasurer, Minister for Energy and Minister for Home Ownership, and the Minister for Finance, Trade, Employment and Training.

We have a unifying vision, purpose, and set of values that guide everything we do. Our vision helps us to understand where we are heading, our purpose is what we do, and our values are how we do it.

Figure 1: EQL Group of companies



Structure and operations

Energy Queensland operates predominantly in Queensland as the parent company of the EQL Group. We provide administrative, corporate and management functions to each of the EQL Group entities and their subsidiaries.

Our electricity distribution businesses, Ergon Energy Network and Energex deliver electricity across Queensland. We supply more than five million Queenslanders through more than 200,000 kilometres of electricity networks, and 33 isolated systems.

Our retailer, Ergon Energy Retail, sells this electricity to its 752,000 customers throughout regional Queensland, with generation, energy trading and retailing capabilities. Our customer numbers make us the fourth largest retailer in the National Electricity Market.

Yurika provides integrated solutions in energy and infrastructure, energy supplies, metering, telecommunications, and digital services to connect its customers to a sustainable energy future.

We energise Queensland communities from Tweed River to Torres Strait and from Brisbane across to Birdsville, and through Yurika's services, to a growing national footprint. Our core service area is shown in **Figure 2**.

We have more than 9,700 employees across Queensland, and in other Australian markets that we're operating in. Approximately half of our employees reside and work in regional areas.

We employ a diverse range of people in operational, technical and professional roles. The majority are engaged through direct employment on permanent or fixed term contracts.

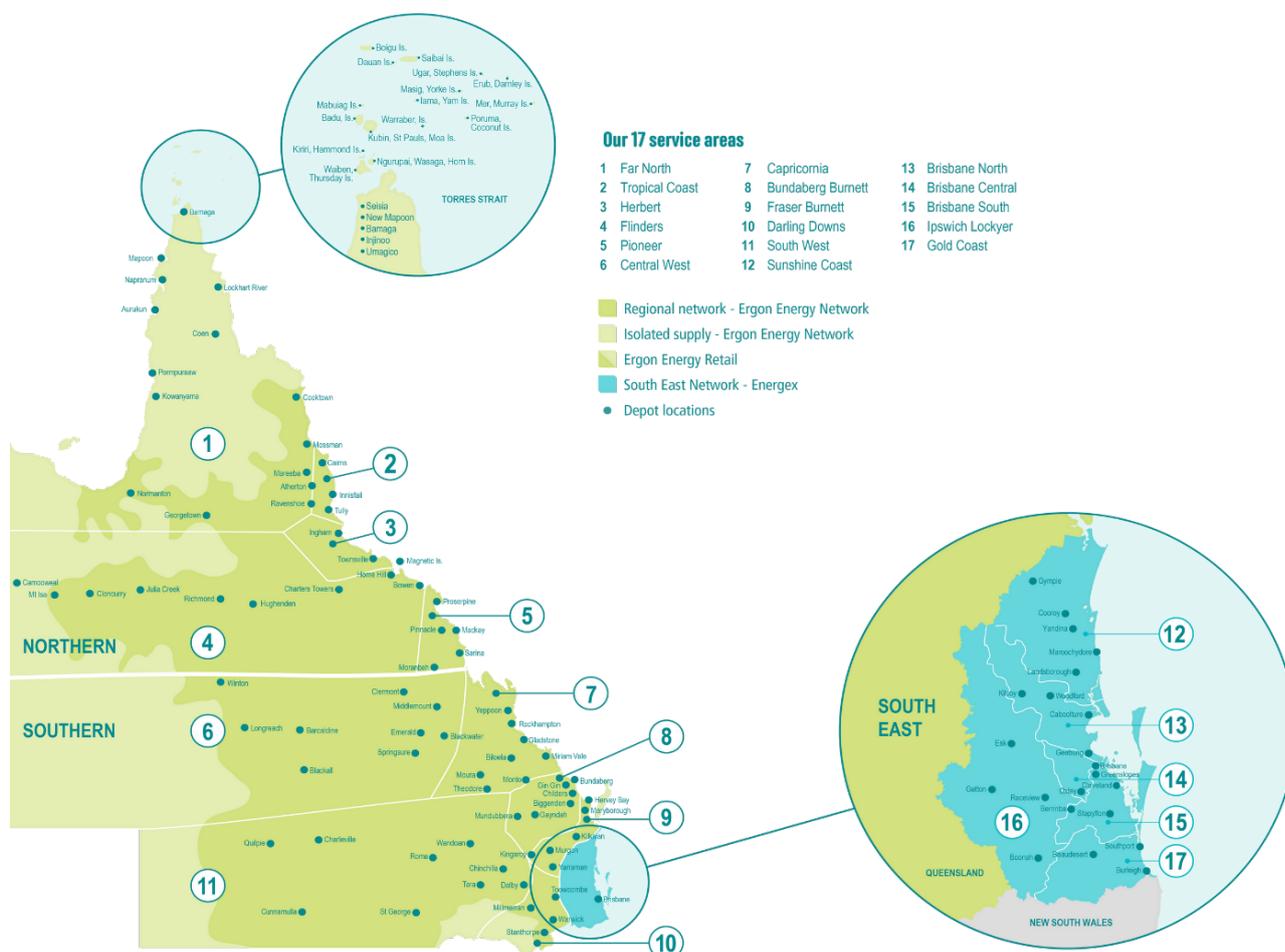


Figure 2: EQL core service areas

Investments

Energy Queensland holds a minority investment in Queensland Capacity Network Pty Ltd ACN 633 081 517 (trading as QCN), a communications company set up for the purpose of enabling faster and more reliable internet services in regional Queensland.

Ergon Energy Retail holds an interest in EnergyOS Pty Ltd ACN 164 557 448, a software company that delivers energy management and portfolio services.

Supply Chain

Procurement of goods, materials and services is governed by robust policies, procedures and processes that apply to all employees and contractors working for or on behalf of the EQL Group.

While EQL has a global supply chain with suppliers in Europe, the UK, North America, New Zealand, China, and Southeast Asia, we are committed to supporting local, state and national businesses in alignment with the requirements of the Queensland Procurement Policy.

Assessing the risk of modern slavery in our operations and supply chain

Operational risk assessment

EQL operates within a highly regulated industry and, as a Government Owned Corporation, is subject to additional oversight and community expectations.

We continue to assess the risk of modern slavery in our operations. As in previous years, this assessment considers a range of criteria, including:

- Sector and industry risks - recognising that certain sectors may inherently carry higher risks due to their characteristics, products, and processes.
- Product and services risks - evaluating the potential risks associated with how products and services are produced, provided, or used.
- Geographic risks – acknowledging that some countries present higher modern slavery risks due to factors such as poor governance, weak rule of law, conflict, migration flows, and socio-economic conditions.

During the 2025 financial year reporting period, dedicated workshops were also undertaken within business areas and across EQL’s subsidiary companies where the potential exposure to modern slavery risks is considered more likely.

These sessions, delivered in collaboration with subject matter experts, enabled more targeted and meaningful evaluations while also embedding modern slavery awareness among key stakeholders.

Based on our operating context and insights gained through the 2025 workshops, the EQL Group continues to assess the risk of modern slavery practices in our operations as low.

Further to this, EQL’s commitment to ethical and responsible decision-making is supported by our Integrity Framework, which includes robust policies, training, guidelines, and internal support networks. Our recruitment, resourcing, and governance frameworks also provide strong safeguards against modern slavery risks for our employees. These protections are supported by our People Strategy 2024–2032, which focuses on empowering and enhancing our workforce to deliver the best outcomes for our customers and communities.

Supply chain risk assessment

EQL employs a dual-survey approach tailored to supplier size and capacity to assess and manage modern slavery risks across our supply chain.

Small suppliers (businesses with less than 20 employees) are engaged through a bespoke questionnaire developed by EQL during this reporting period. This is a targeted survey designed to encourage participation. 320 suppliers were requested to complete the survey during the reporting period with a 39% completion rate.

Large suppliers are invited to complete a modern slavery self-assessment questionnaire via the Informed 365 platform. During this reporting period, 235 suppliers were invited to register through this method with a 48% completion rate.

Larger suppliers are also required to review their survey annually via the Informed 365 platform annually. Since its introduction in 2020, a total of 2,473 surveys have been completed, with 20% of suppliers having submitted a response within the most recent 12-month period.

Survey responses indicate that suppliers are actively taking steps to reduce the risk of modern slavery in their operations and supply chains by including contractual obligations in supplier agreements, providing training to their employees and supply chain mapping. Our data reflects 59% of EQL suppliers have stated in their survey

response that they have mapped out at least one tier 1 supplier (an 8% increase on the prior period) and a further 18% indicate they plan to do so within the next 12 months.

These survey completion rates across both engagement methods reflect EQL's continued commitment to improving supplier participation and awareness of modern slavery risks, particularly among small and regionally based vendors. They also highlight the varying levels of engagement across supplier types and reinforce the importance of a tailored approach that considers the capacity and context of businesses within our supply chain.

Additionally, as a member of the Energy Procurement Supply Association (EPSA), EQL works closely with other members to strengthen supplier engagement and share insights. This collaborative approach expands our reach and enhances visibility across shared vendor networks, contributing to the total engagement figure of 1,444 suppliers.

Due Diligence

We continue to mitigate the risks through our procurement and contract management policies, procedures, and processes. For example, the EQL Group:

- only use licensed agencies on either the Queensland Government Contingent Resource Panel or our own panel of vetted contractors and suppliers;
- utilise robust engagement and contract terms;
- use Informed 365 to assess individual suppliers; and
- engages proactively with small business suppliers to build their awareness and understanding of modern slavery risks within their operations and supply chains, including through tailored guidance, capacity-building initiatives, and access to self-assessment tools.

Further details in relation to the actions we have taken to mitigate the risk of modern slavery are outlined below.

Queensland Government's Framework

As a Government Owned Corporation, Energy Queensland Limited complies with the Queensland Procurement Policy 2023, which affirms a strong commitment to eliminating modern slavery in government supply chains. This is operationalised through the Ethical Supplier Threshold, Ethical Supplier Mandate, and the Queensland Government Supplier Code of Conduct 2023.

All suppliers must confirm, as part of the registration process, their commitment to comply with the Queensland Government Supplier Code of Conduct when providing goods or services to EQL and its subsidiaries. In line with the Code, suppliers are expected to take reasonable steps to prevent, identify, and address any instances of human rights exploitation, including modern slavery, within their operations and supply chains. This includes implementing appropriate policies and practices, conducting supply chain risk assessments, and ensuring that their business activities, and those of their suppliers do not contribute to or benefit from exploitative practices.

Tendering

All tenderers for our procurement activities are required to answer modern slavery questions that allow us to assess the risk of modern slavery in their operations and supply chain. Those tendering on goods and materials contracts are required to provide details about their supply chain, including the primary and secondary locations of where they will obtain materials they propose to supply to us. This information is collated into a mapping register to provide an overall view of the supply chain to enable more informed tendering decisions.

Contract clauses

All contract templates, including those for our subsidiaries, include modern slavery clauses. These clauses are regularly reviewed to ensure the requirements in regards to our suppliers assessing their own supply chains and informing EQL of any potential instances of modern slavery are fit for purpose.

The contract may also enable us to request information about a supplier's compliance with the modern slavery contract clauses and to undertake due diligence on their supply chain.

Collaboration and engagement with industry

Energy Queensland continues to be an active member of the Modern Slavery Community of Practice (CoP). The CoP is comprised of Queensland Government Owned Corporations, statutory bodies, and budget sector agencies.

This ongoing collaboration provides a forum to share knowledge, expertise and resources (such as training and awareness materials) amongst members. The CoP is an integral source of information and input into the Queensland Government's Modern Slavery Framework and Roadmap.

As a member of the EPSA, we continue to meet with Informed 365 and other members to discuss platform performance and improvements, as well as local and global developments in the fight against modern slavery. Guest speakers are regularly invited to share their knowledge, skills and experience in combating modern slavery.

Training and awareness

EQL offers general awareness modules (adapted from content shared by the Australian Border Force) to all EQL Group staff to support awareness around identifying, assessing, and managing modern slavery risks.

Tailored training is provided to our procurement team members, given the nature of their role requires a greater understanding of modern slavery practices and risk indicators.

Employment

We are committed to paying people equitably and fairly, with robust policies supported by our HR & Pay platform. The majority of staff members are permanent with a small number operating on a contingent arrangement.

Labour hire arrangements recognise market hourly rates which are applied on all labour hire engagements, and is aligned to the whole-of-Queensland Government arrangement, which is prescribed under the Queensland Government's Temporary and Contracted Workers Preferred Supplier Panel.

Enterprise Bargaining Agreements containing terms and conditions of employment are in place covering the majority of EQL employees.

Industrial Relations

The EQL Industrial Relations team work closely with the trade unions on monitoring the rates that are paid to contracting companies for core work and ensuring equivalency to pay levels of permanent employees. The 2024 EBA committed to modernise the classification structure for EQL positions, which includes minimum salaries paid for different occupational groups covered by EQL's Enterprise Agreements. This review and changes are currently in progress via consultative working groups.

Integrity Line and modern slavery investigation process

EQL utilises an Integrity Line (administered externally by Deloitte) for reporting whistle blower issues and any concerns that the EQL Group may be involved in modern slavery practices. The Integrity Line is promoted through internal communication channels in addition to being publicly available on our websites. No reports related to instances of modern slavery were received via the Integrity Line during the reporting period.

Assessing the effectiveness of our actions

EQL continues to monitor the effectiveness of our actions to address modern slavery risks in our operations and supply chain. We have grouped our actions into five core focus areas:

1. supplier engagement and assurance;
2. training and awareness;
3. collaboration;
4. procurement and purchasing processes; and
5. robust integrity and reporting avenues.

We have developed measures of effectiveness against each of these focus areas as detailed in **Table 1**. We continue to evolve our actions and effectiveness measures over each reporting period.

Table 1. EQL's Assessment of Actions Taken:

Focus Area	Objective	Measure of Effectiveness
Supplier engagement and assurance	<ul style="list-style-type: none"> • Increase supplier awareness of modern slavery practices • Encourage suppliers to review their operations and supply chain for human rights and modern slavery practices • Assurance over supplier's self-assessments 	<ul style="list-style-type: none"> • Suppliers on Informed 365 are required to review and update their Self Assessment Questionnaire responses on an annual basis. • Process to review supplier's self-assessments and verify documentation. • Process for engaging with and investigating any supplier with a risk rating of medium, high, or very high. • EQL's small supplier survey was implemented this year with 320 surveys sent and a 39% completion rate. • 48% survey completion rate for large suppliers surveyed via Informed 365.
Training and awareness	<ul style="list-style-type: none"> • Promote awareness of modern slavery practices and support our people to identify signs of modern slavery and how to respond 	<ul style="list-style-type: none"> • Modern Slavery awareness training made available to all staff on EQL's internal learning platform. The awareness training is non-mandatory and on a self-serve basis. • All procurement team members complete the training upon joining the team and refresher training is completed on an annual basis • Periodic review of training materials and resources
Collaboration	<ul style="list-style-type: none"> • Sharing of knowledge and learnings with energy and other utility organisations • Collaborating on activities to support the eradication of modern slavery 	<ul style="list-style-type: none"> • Engagement at monthly EPSA Modern Slavery meetings and Queensland Government Entities' Modern Slavery Community of Practice • Reporting improvements made to the EPSA Modern Slavery Risk platform on Informed 365

Procurement and purchasing processes	<ul style="list-style-type: none"> • Support the identification, assessment, and actions to address modern slavery risks 	<ul style="list-style-type: none"> • Modern slavery risks are considered, identified and mitigated through the procurement process • 100% of contracts include modern slavery clauses
Robust integrity and reporting avenues	<ul style="list-style-type: none"> • Provide employees and third parties with a process to report actual or suspected instances of modern slavery practices in our operations or supply chain • Modern Slavery Investigation Process to allow assessment of incidents raised 	<ul style="list-style-type: none"> • Reports relating to modern slavery made to our 24/7 Integrity Line. No reports were made in the reporting period. • Employee awareness of reporting process • Periodic review of the Modern Slavery Investigation Process

Consultation and Approval

Energy Queensland and its wholly owned subsidiaries Energex Limited, Ergon Energy Corporation Limited, Ergon Energy Queensland Pty Ltd and Yurika Pty Ltd Limited are each reporting entities under the *Modern Slavery Act 2018* (Cth).

To prepare this joint statement, we actively engaged and consulted with each reporting entity in the EQL Group. The Executive Leadership Team that is shared across the EQL Group was involved in the review and the endorsement of this Statement for approval by the Energy Queensland Board of Directors.

This statement was approved pursuant to the *Modern Slavery Act 2018* (Cth) by the Board of Energy Queensland Limited as the parent entity on 24 November 2025.



Chair