



# Modern Slavery Statement

ElectraNet Pty Limited

1 July 2021 - 30 June 2022

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## REPORTING CRITERIA 1

# Reporting Entity

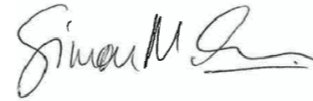
This Modern Slavery Statement is jointly made by:

ElectraNet Pty Limited (ACN 094 482 416) and ElectraNet Transmission Investments Pty Ltd (ACN 119 027 262) pursuant to the Modern Slavery Act 2018 (Cth) for the year ended 30 June 2022.

This Statement was approved by the Board of the ElectraNet Group on 23 November 2022.



**Gordon Jardine**  
Independent Director and Chairman



**Simon Emms**  
Chief Executive ElectraNet

### Reporting Entity

This Modern Slavery Statement is submitted by the ElectraNet Group, comprising ElectraNet Pty Limited ACN 094 482 416 and its subsidiary ElectraNet Transmission Investments Pty Limited, ACN 119 027 262.

### Street Address

ElectraNet Pty Ltd  
52-55 East Terrace  
Adelaide, South Australia 5000

### Postal Address

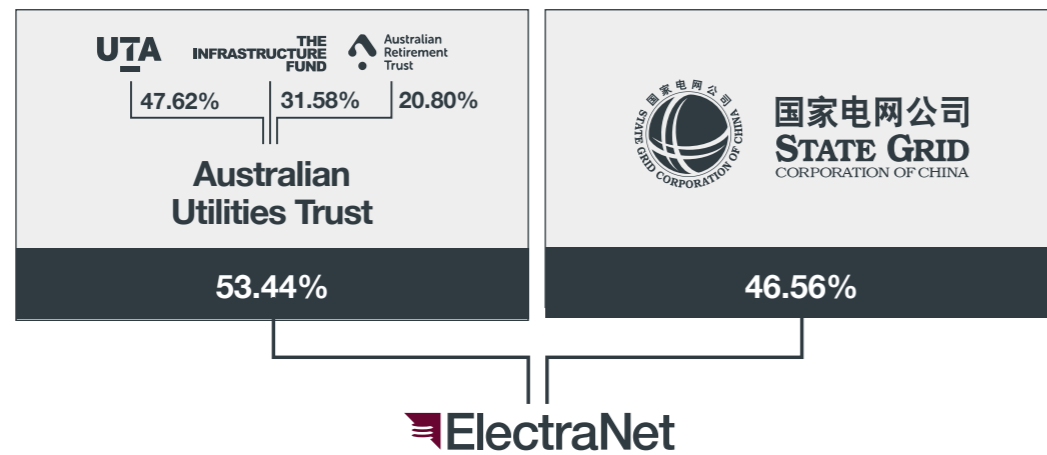
ElectraNet Pty Ltd  
PO Box 7096  
Hutt Street Post Office  
Adelaide, South Australia

## REPORTING CRITERIA 2

# Structure, Operations and Supply Chains

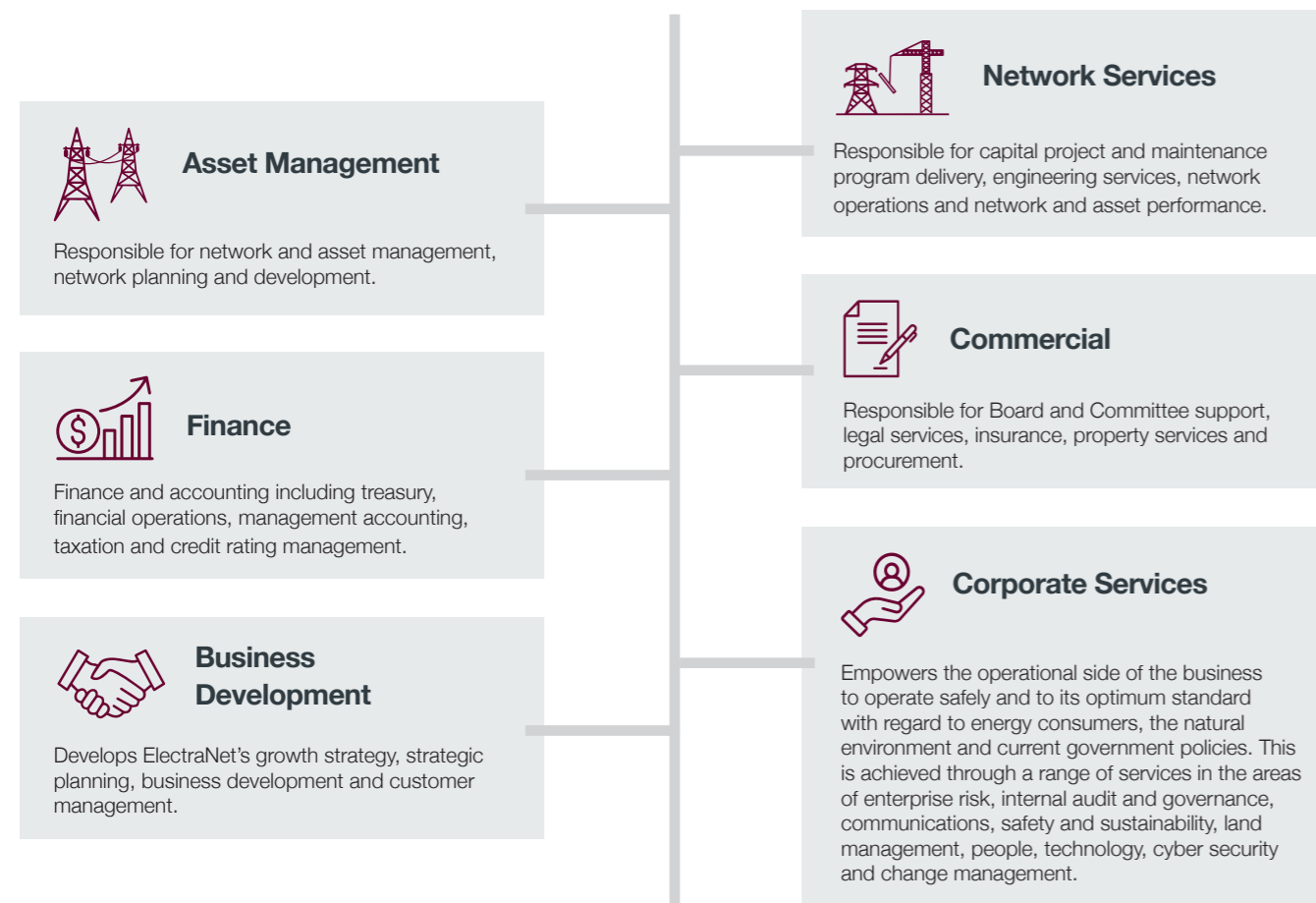
### Entity Structure

ElectraNet is a private company and operates under the governance of the ElectraNet Board of Directors, and an independent Chairman. ElectraNet Pty Limited has a fully owned subsidiary, ElectraNet Transmission Investments Pty Limited, together referred to as ElectraNet for the purpose of this Statement. The ownership structure of ElectraNet is depicted in this diagram.



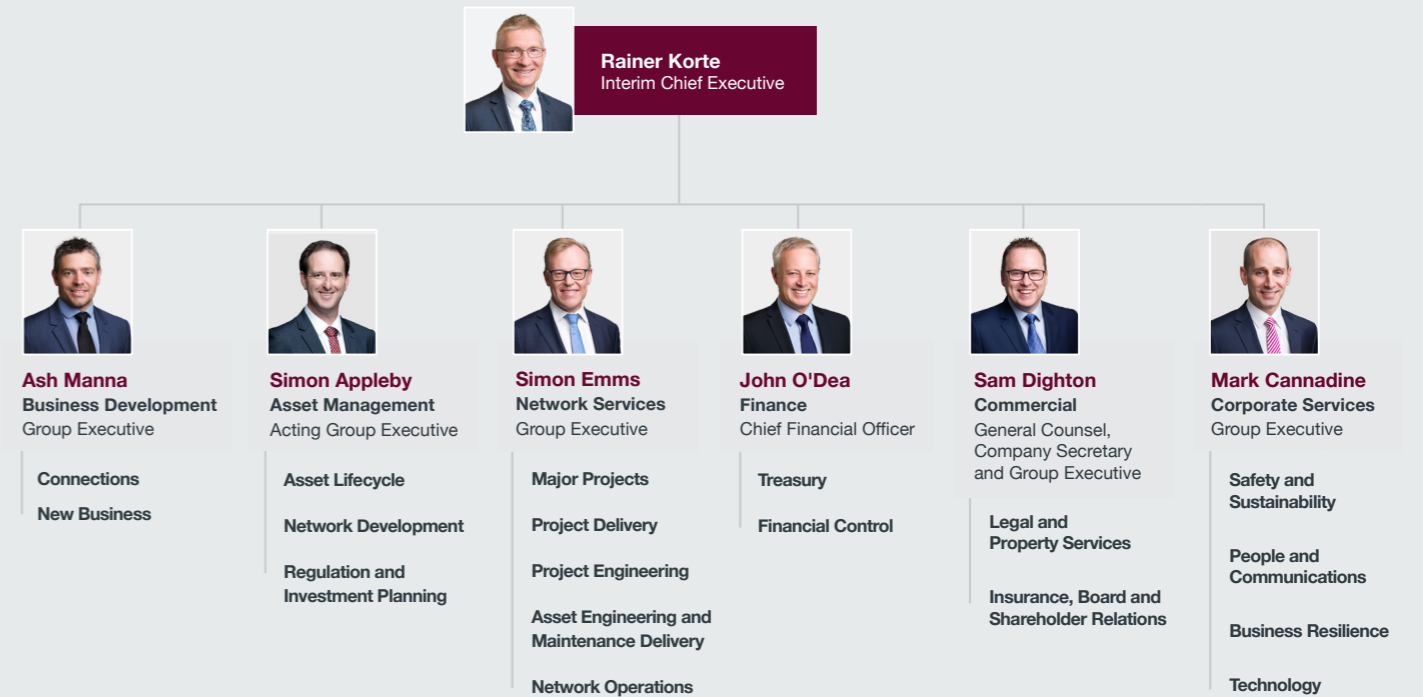
### Organisational Structure

ElectraNet has six divisions which work together to ensure continued improvement and the delivery of value for customers and shareholders.



As at 30 June 2022

### Corporate Structure



As at 30 June 2022

**ElectraNet powers people's lives by delivering safe, affordable, and reliable solutions to power homes, businesses, and the economy.**

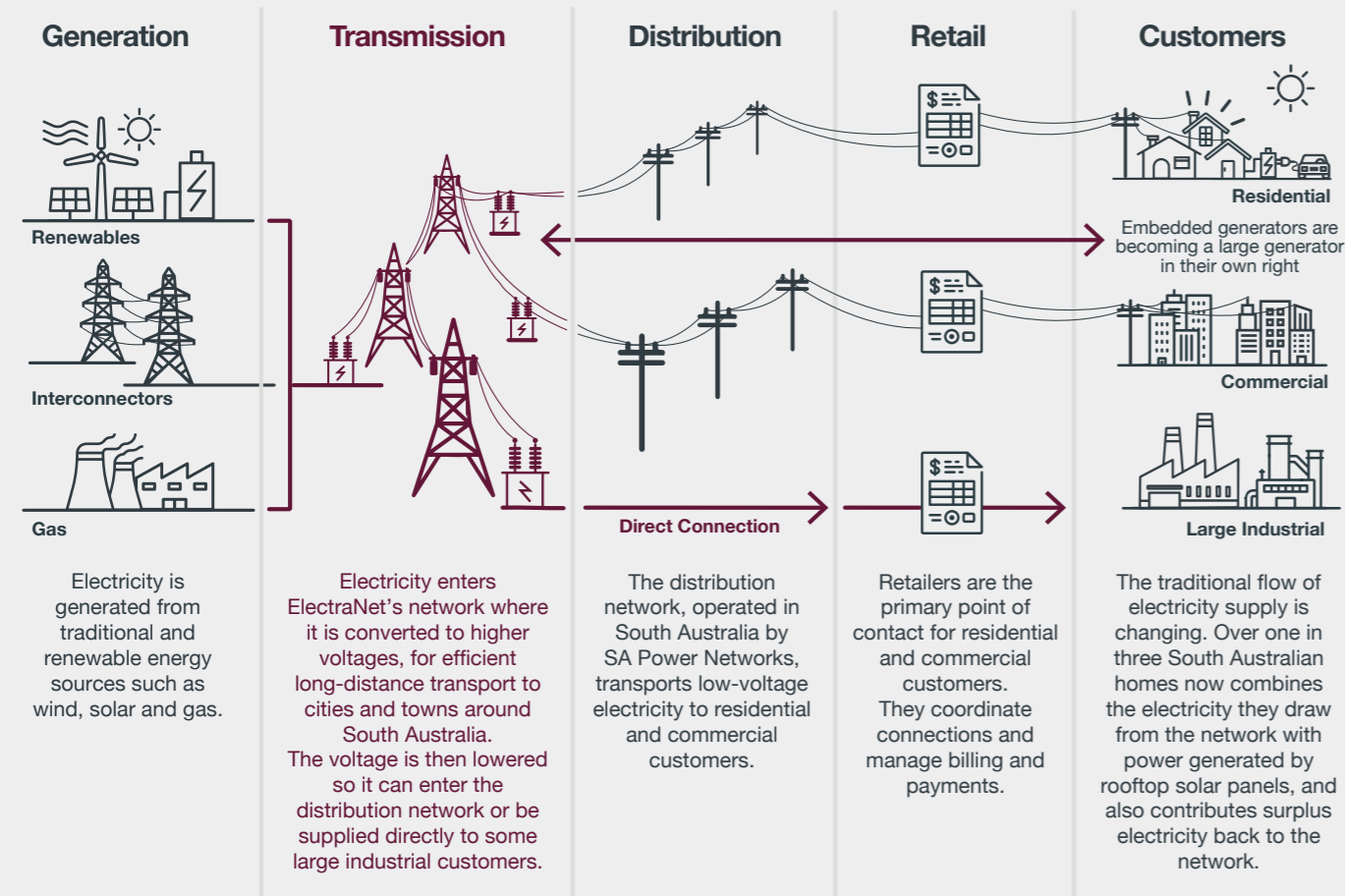
As the owner and operator of South Australia's electricity transmission network, ElectraNet plays a vital role in providing affordable and reliable power supply to the homes, businesses, and communities of South Australia.

The transmission network transports energy from local and distant generation sources to where it is needed to serve electricity customers. It also provides system services such as system strength and inertia to support the growth in renewable energy. Increasingly the network is supporting the two-way flow of power from distributed sources such as rooftop solar PV to local and distant customers.

The National Electricity Objective is to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity with respect to:

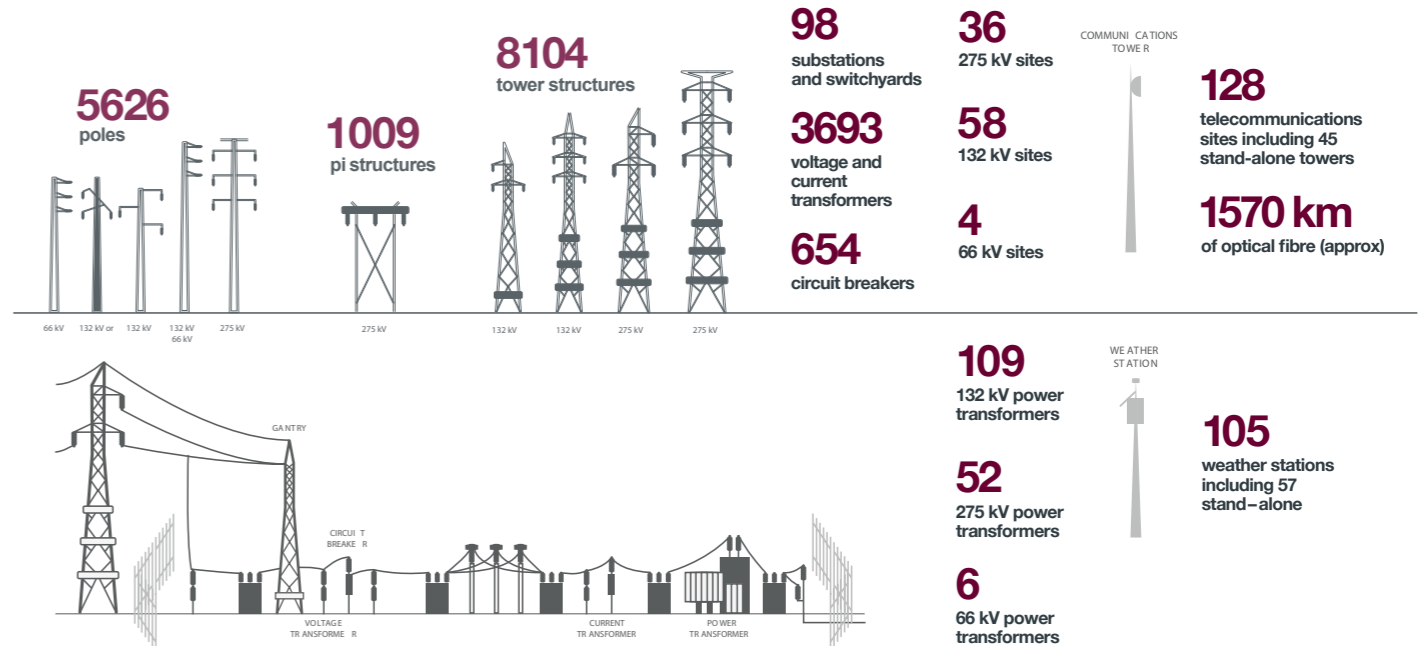
- price, quality, safety and reliability and security of supply of electricity
- the reliability, safety, and security of the national electricity system.

**The role of ElectraNet**



**ElectraNet has over 5,949 circuit kilometers of transmission lines, supported by 14,739 structures, including 27 kilometers of underground transmission cable.**

**Our Assets**



South Australia's High Voltage electricity network is owned and operated by ElectraNet. The planning, operating and maintaining of the network is managed by ElectraNet's workforce of approximately 380 employees. This workforce is located in South Australia working from corporate offices, warehouse operations and at numerous asset locations throughout the State.

With the continuing impact of COVID-19 during 2021/22, ElectraNet has further developed flexible working arrangements including working from home and remote access as part of day to day business activities and interactions. ElectraNet's safety culture includes proactive identification of work health and safety risks. Staff are encouraged to report any observation, regardless of the level of risk it poses.

To support the operation and maintenance of the high voltage transmission network, ElectraNet has a significant supplier base that provide a range of goods and services to support the efficient delivery of electricity to South Australian customers.

This supplier base is underpinned by select construction and maintenance service suppliers who perform the majority of network augmentation services undertaken by ElectraNet suppliers.

ElectraNet has strict Work Health and Safety procedures and policies that must be followed. This includes audits and observations of work being undertaken to ensure that the safety risks to any person are minimised. The safety of ElectraNet's staff, suppliers and community is our number one priority.



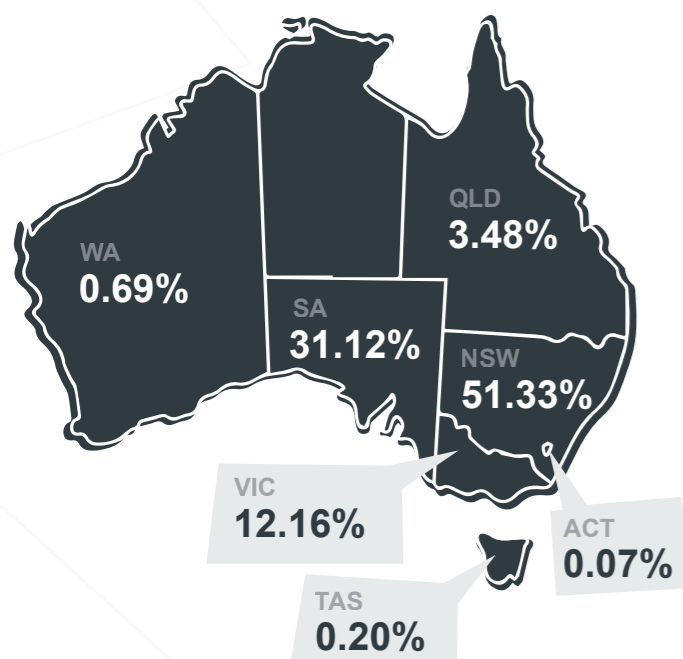
## REPORTING CRITERIA 3

# Risks of modern slavery in operations and supply chain

ElectraNet has considered the following factors when assessing the risk of modern slavery in operations and supply chain.

### Factor 1. Location of suppliers

1. In 2021/22, **99.05%** of ElectraNet's expenditure was with Australian based organisations. This is broken down as follows:



2. The remaining **0.95%** of ElectraNet's expenditure in the reporting period was with organisations based in Canada, Hong Kong, Malaysia, the Netherlands, New Zealand, Singapore, South Africa, South Korea, United Kingdom, United States of America and Ireland.

### Factor 2. Nature of purchases

In the 2021/22 financial year, ElectraNet's expenditure was categorized as follows:

1. Direct goods including plant and equipment, consumables and IT hardware – **9.49%**.
2. Services including construction and maintenance services, professional services, legal services, facilities services and supplementary labour – **90.51%**.

ElectraNet purchases a range of specialist plant and equipment to expand and maintain our transmission network. This plant and equipment has precise technical requirements that can only be sourced from a number of expert suppliers who manufacture the equipment required. These expert suppliers generally require staff with specialist skills rather than unskilled staff.

All factories that are used for the manufacture of this plant and equipment are subject to a factory pre-qualification which includes observations on technical procedures as well as worker health and safety.

For our construction suppliers, ElectraNet monitors and has corporate performance targets for safety of workers on projects.

### Factor 3. Number of suppliers who have submitted a Modern Slavery Statement

Using the Modern Slavery Register ElectraNet reviewed the number of suppliers that had submitted a Statement. Of the suppliers engaged in this period, **80** have submitted a Modern Slavery Statement. These suppliers account for **70%** of ElectraNet's supply chain expenditure during the period.

#### Risk statement

ElectraNet maintains a level of assurance so that the risk of modern slavery in our supply chain is minimised.

This is based on:

- The very high use of Australian based suppliers
- The nature of ElectraNet's operations requiring specialist skills which are less vulnerable to modern slavery
- The number of suppliers, accounting for **70%** of ElectraNet's supply chain, who submitted a Modern Slavery Statement

## REPORTING CRITERIA 4

# Actions taken to address risks, including due diligence and remediation

In ElectraNet's Statement for 2021/22 the following actions were identified:

### 1 Continue assessment of suppliers through the modern slavery pre-qualification questionnaire.

To address this action ElectraNet continued pre-qualification of suppliers with 76 suppliers undertaking the assessment during the Reporting Period.

### 3 Review of the factory pre-qualification observation questionnaire.

To address this action ElectraNet reviewed the factory pre-qualification checklist and has not taken further action at this time.

The current observations include:

- Typical audit undertaken by original equipment manufacturer addressing modern day slavery risks in the supply chain. As an example for an equipment supplier in Japan, ElectraNet incorporated the Japanese Ministry of Health Labour & Welfare audit as part of a typical factory assessment.
- Occupational Health and Safety certification
- Worker Outlook
- Management process for non-original parts/components from suppliers
- Promotion of Respectful workplace behaviours/Formalised Code of Conduct

In addition to the above planned actions, ElectraNet:

- In November 2021 a materiality assessment on sustainability issues, including modern slavery was completed by Ernst & Young;
- Utilises fit-for-purpose risk management system (Predict!) and regularly produce and review a Safety & Sustainability Risk Register;
- Continued rollout of new contract templates containing Modern Slavery clauses with specific focus on suppliers of plant and equipment;
- 2022 ISO 45001 scheduled 5th Dec.

### 2 Industry collaboration in the Management of Modern Day Slavery risk.

To address this action ElectraNet subscribed to the Informed 365 Modern Slavery Platform as part of a consortium with other members of the Energy Procurement and Supply Association.

This tool:

- Allows suppliers to answer just one supplier questionnaire with responses being available to nominated consortium members
- Quarterly meeting with industry participants to benchmark and leverage common supply chains
- Provides a risk level based on geography and industry for each supplier
- Provides a risk level based on responses provided to the supplier questionnaire

### 4 Improve knowledge and awareness of modern slavery risks across ElectraNet's business.

To address this action ElectraNet:

- Publish Modern Slavery updates on our staff internet site
- Second annual training session undertaken with a plan to deliver the training ongoing
- Implementation of statutory declaration process to ensure workers along the supply chain are paid in accordance with lawful obligations

REPORTING CRITERIA 5

# How the reporting entity assesses the effectiveness of these actions

ElectraNet's effectiveness is measured through:



**Awareness across our stakeholders, including staff, the Executive Management Team and ElectraNet Board.**

This has occurred through:

- The consultation and approval process of the annual Statement
- Internal communications and training, including the Whistleblower Policy
- ElectraNet staff participation in procurement processes
- Benchmarking and leverage of common industry supply chains



**Assessing compliance by suppliers with the legislation.**

This has occurred through:

- 80 suppliers submitting their Modern Slavery Statements



**Awareness of suppliers, not only our high-spend suppliers through:**

- Modern Slavery provisions in contracts, including Purchase Orders
- Modern Slavery questions in tender documents
- Modern Slavery questionnaire in pre-qualification procedure



REPORTING CRITERIA 6

# Process of consultation

The content of this statement applies to both ElectraNet Pty Limited and ElectraNet Transmission Investments Pty Ltd. Representatives across both reporting entities were consulted in the preparation and review of this statement.

ElectraNet has engaged with internal and external stakeholders throughout the Reporting Period on the topic of Modern Slavery.



## Other information

ElectraNet will continually improve the understanding and certainty of risk in our supply chain through:

**1** Continuation of our pre-qualification programme

**2** Continuation of establishing contemporary contracts that contain Modern Slavery clauses

**3** Engagement with peers and industry to continue to develop understanding of risks

**4** Continual review of relevant policies and procedures to identify areas for improvement

**5** Ongoing evaluation process for plant and equipment suppliers

**6** Ongoing discussions and identification of training opportunities with internal and external stakeholders

**7** Develop Modern Day slavery working group to raise awareness, identify risks and mitigations

**8** Review new vendor onboarding process and include modern slavery questionnaire as a requirement

**9** Ongoing Board engagement to discuss modern slavery risk



