

FY2023 MODERN SLAVERY STATEMENT

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About this Statement

This Modern Slavery Statement (**Statement**) is made pursuant to section of the *Modern Slavery Act 2018* (Cth) (the **Act**). This Statement is provided by Pika HoldCo Pty Ltd (ABN 56 652 787 150) (**Pika HoldCo**), on behalf of Spark Infrastructure Group, and covers the following entities:

- Pika HoldCo Pty Ltd (ABN 56 652 787 150)
- Pika BidCo Pty Ltd (ABN 67 652 787 258)

Spark Infrastructure:

- Spark Infrastructure Trust (ABN 30 664 665 564)
- Spark Infrastructure RE Pty Limited (ABN 36 114 940 984)
- Spark Infrastructure Holdings No. 1 Limited (ABN 14 116 940 786)
- Spark Infrastructure Holdings No. 2 Limited (ABN 16 116 940 795)
- Spark Infrastructure Holdings No. 3 Limited (ABN 62 117 034 492)
- Spark Infrastructure Holdings No. 4 Pty Limited (ABN 66 116 823 548)
- Spark Infrastructure Holdings No. 5 Pty Limited (ABN 23 151 150 275)
- Spark Infrastructure (Victoria) Pty Limited (ABN 18 116 940 740)
- Spark Infrastructure (SA) Pty Limited (ABN 80 116 940 688)
- Spark Infrastructure SA (No1) Pty Limited (ABN 54 091 142 380)
- Spark Infrastructure SA (No2) Pty Limited (ABN 19 091 143 038)
- Spark Infrastructure SA (No3) Pty Limited (ABN 50 091 142 362)
- Spark Infrastructure Electricity Assets Pty Limited (ACN 609 164 570) (ACN only)
- Spark Infrastructure Electricity Assets Trust (ABN 95 674 223 769)
- Spark Infrastructure Electricity Operations Pty Limited (ACN 609 164 598) (ACN only)
- Spark Infrastructure Electricity Operations Trust (ABN 48 311 370 213)

Spark Renewables:

- Spark Renewables Pty Limited (ABN 90 632 860 023)
- Renewables ServiceCo Pty Limited (ABN 96 667 788 669)
- Bomen SF Holdco Pty Ltd (ACN 631 229 331) (ACN only)
- Bomen SF Hold Trust (ABN 23 832 721 903)
- Bomen Solar Farm Pty Ltd (ABN 40 620 832 108)
- Bomen SF Trust (ABN 67 363 258 504)
- Bomen SF Finco Pty Ltd (ABN 46 631 229 359)
- Dinawan Energy Hub Pty Ltd (ABN 83 646 054 524)
- Dinawan Energy Hub Trust (ABN 86 873 457 480)
- Mates Gully Solar Farm Pty Limited (ABN 72 640 967 755)
- Mallee Wind Pty Ltd (ABN 12 636 566 713)
- Yorke Peninsula Wind Farm Project Pty Ltd (ABN 15 138 965 901)
- Wattle Creek Energy Hub Pty Ltd (ABN 28 664 148 958)
- Wattle Creek Energy Hub Trust (ABN 88 172 296 913)

Spark Infrastructure Group sold the Spark Renewables subsidiaries on 29 September 2023. As the Statement focuses on activities completed in the calendar year reporting period ending 31 December 2023 (**FY2023**), we have taken the Spark Renewables entities into consideration while preparing the Statement as Spark Infrastructure owned Spark Renewables for three quarters of the year.

Spark Infrastructure and Spark Renewables, together the “Spark Infrastructure Group”, should be considered separate entities from an operational perspective. However, the overarching governance structure for both entities, including back-office finance functions and most policies and procedures, was managed by Spark Infrastructure Group’s corporate office. Going forward, Spark Infrastructure and Spark Renewables will be publishing two separate Modern Slavery Statements.

Spark Infrastructure Trust is owned by Pika BidCo Pty Ltd (**Pika BidCo**), which is directly owned by Pika HoldCo. Both Pika BidCo and Pika HoldCo are companies owned by funds and/or investment vehicles managed and/or advised by Kohlberg Kravis Roberts & Co. L.P. and/or its affiliates, Ontario Teachers’ Pension Plan Board and Public Sector Pension Investment Board.

This Statement was approved by the Spark Infrastructure Board on 26 June 2024.



Laura Reed, Chair
Director (Chair), Spark Infrastructure

Overview of Spark Infrastructure Group (Spark Infrastructure)

Spark Infrastructure is a long-term investor in electricity infrastructure assets within Australia. Its investment portfolio companies help deliver electricity to over 5.5 million homes and businesses and are also heavily involved in supporting the transition in Australia's electricity system to one that is increasingly reliant on renewable energy.

As of 31 December 2023, Spark Infrastructure's investment portfolio companies comprised of electricity transmission networks (Transgrid) and distribution networks (SA Power Networks & Victoria Power Networks). Spark Infrastructure owned renewable energy generation assets (Spark Renewables) until 29 September 2023.

Spark Renewables (100% ownership until 29 September 2023)

Spark Renewables is a leading renewable energy developer and long-term owner of renewable energy projects, with an operational solar farm (100MW Bomen Solar Farm in NSW) and a large portfolio (of ~7.1 GW) of development assets including wind, solar, storage and green hydrogen projects. Spark Infrastructure sold Spark Renewables on 29 September 2023 to Tenaga Nasional Berhad.

Victoria Power Networks (49% ownership)

CitiPower and Powercor (together known as Victoria Power Networks), distribute electricity to over 1.2m customers across Melbourne and western Victoria to the South Australian and New South Wales borders. In the CitiPower network, electricity is distributed 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.

Beon Energy Solutions, a wholly owned subsidiary of Victoria Power Networks, is a leader in the deployment of large-scale renewable energy and infrastructure projects, with extensive expertise in design, construction and maintenance.

SA Power Networks (49% ownership)

SA Power Networks is the sole operator of South Australia's electricity distribution network, supplying electricity to over 900,000 residential and commercial customers across the state. Its network covers more than 178,000km², with over 650,000 poles and more than 90,000km of powerlines.

Enerven, a wholly owned subsidiary of SA Power Networks, focuses on providing integrated renewable energy solutions and telecommunications projects.

Transgrid (15.01% ownership)

Transgrid is the largest high-voltage electricity transmission network in the National Electricity Market (NEM), connecting generators, distributors and major users in NSW and the ACT. Its network consists of more than 13,248km of power lines and 126 substations and switching stations.

Lumea, a wholly owned subsidiary of Transgrid, provides integrated energy management and large-scale energy storage solutions to wholesale, Government and emergency services customers.

Although Spark Infrastructure's investment portfolio companies are not considered part of its operations or supply chain, it has engaged with its investment portfolio companies on modern slavery throughout the year. Summaries of the investment portfolio companies' modern slavery statements are set out below on pages 13-17.

Update on Spark Infrastructures' previously identified key priorities for FY2023

Below is an update on the key priorities for FY2023 identified by Spark Infrastructure to enhance its understanding and management of modern slavery risks in its operations and supply chain:

- **Improve engagement levels with its supply chain**

To refine Spark Infrastructure's understanding of its supply chain, Spark Infrastructure's Modern Slavery Questionnaire, which is sent out annually to majority of its suppliers, was further enhanced in FY2023 by including questions on sourcing of goods and services from jurisdictions considered to be 'high risk' for human trafficking, forced or compulsory labour, slavery or servitude. The updated Modern Slavery Questionnaire was sent to approximately 50 of Spark Infrastructure's suppliers, who represented 94% of Spark Infrastructure's total spend during the financial year. The responses of the suppliers were reviewed and assessed to identify potential risks and to understand the risk mitigation strategies of the suppliers.

- **Update policies and procedures**

Spark Infrastructure's Procurement Policy was replaced by the Supplier Management Policy (**Policy**) in FY2023, which outlines the technical and operational expectations from Spark Infrastructure's suppliers and requires a Supplier Register to be maintained which details the important terms/contract clauses between Spark Infrastructure and its suppliers. The Policy also sets out an approval procedure by Spark Infrastructure's Management for onboarding a new supplier. A 'supplier questionnaire' is required to be sent to prospective suppliers under the Policy, which covers questions on the supplier's compliance with modern slavery laws and the policies and procedures the supplier has in place to identify and mitigate modern slavery risks in its supply and value chains. The responses provided by the prospective supplier in the questionnaire are thoroughly reviewed and assessed for potential risks and to understand the risk mitigation strategies of the suppliers before onboarding.

- **Strengthen contractual arrangements**

As several of Spark Renewables' major projects approached the construction stage, it had obtained preliminary advice on the contractual management of modern slavery risk in its supply chains.

- **Employee training**

During FY2023, external subject matter experts were engaged to provide mandatory training for all Spark Infrastructure (including Spark Renewables) employees. The training focused on understanding the prevalence of modern slavery in modern supply chains, how to identify scenarios which may promote higher risks of modern slavery and actions that could be undertaken should those scenarios arise. The training session was conducted to ensure modern slavery risks remain significant to Spark Infrastructure's employees and that best practices are routinely communicated throughout the organisation.

- **Leverage industry relationships and experience**

In FY2022, Spark Renewables committed to a Pledge Against Modern Slavery (developed by the Clean Energy Council (**CEC**)) as part of an industry-wide response to addressing modern slavery risks. The pledge commits Spark Renewables to practices designed to ensure its supply chain is free of adverse human rights impacts, including modern slavery, and makes sure its corporate responsibility is to respect human rights. Spark Infrastructure's ESG team continues to attend numerous educational seminars to better understand how to identify modern slavery and supply chains risks and how to mitigate these risks in practice. The team also participated in CEC's Risks of Modern Slavery Working Group, which is in the process of co-developing an industry code of practice for the renewables sector and reviewing the Act. Participation ensures Spark Infrastructure remains at the forefront of supply chain management practices within the industry and can work towards collective engagement with upstream industry providers.

Looking forward

Spark Infrastructure recognises that the management of modern slavery risks is a process requiring continual refinement. It has identified the following items as the key priorities looking forward:

- **Continue to improve engagement levels with its supply chain**
Ongoing refinement of its approach to supplier engagement, including enhancement of its understanding of its supply chain beyond the first tier and comparing responses received from suppliers to Spark Infrastructure's Modern Slavery Questionnaire to previous years to help identify potential emerging risks and the risk mitigation strategies the suppliers have in place.
- **Audit policies and procedures**
Continue to review current policies and procedures to ensure they meet best practices.
- **Strengthen contractual arrangements**
Embed anti-slavery and supply chain management clauses in any new supply contract, along with ensuring consistency with the Act, which may include warranties, auditing, and termination rights, requiring the supplier to report any instances of modern slavery in its operations or supply chains. The supplier will also be required to provide all reasonable information to Spark Infrastructure regarding its compliance with modern slavery laws.
- **Governance**
Evaluate whether to develop a Supplier Code of Conduct and/or Modern Slavery Policy which may be provided to suppliers so that they are aware of Spark Infrastructure's expectations and requirements when it comes to delivering goods and services to Spark Infrastructure. This includes labour and human rights expectations and minimum ethical, moral and corporate governance.
- **Employee training**
Ongoing mandatory Modern Slavery training sessions to all Spark Infrastructure employees will continue to be conducted to increase awareness and to ensure that management of modern slavery risks remains significant to all employees. Training on procurement of suppliers in accordance with Spark Infrastructure's Supplier Management Policy will also be conducted.

Governance Overview and Supply Chain Management

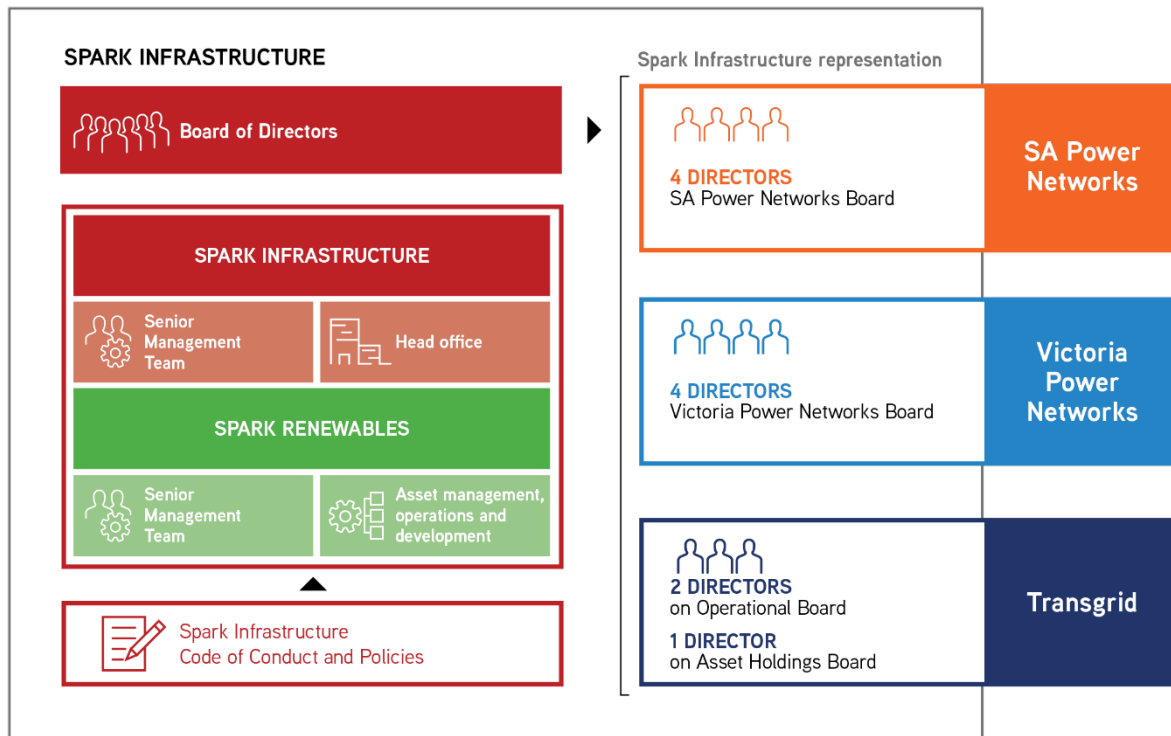
Spark Infrastructure's Governance Structure until 29 September 2023

Spark Infrastructure's corporate governance structure consisted of a Board of Directors, various Board Committees (including the Audit, Risk and Compliance committee), the Spark Infrastructure Management and the Spark Renewables Management.

Key roles and responsibilities regarding the assessment and management of modern slavery risks included:

- Spark Infrastructure Board of Directors – Ultimate oversight of compliance with modern slavery regulations;
- Management – Responsibility for day-to-day management of modern slavery risks in direct operations and supply chain; and
- General Counsel and Company Secretary – Responsibility for privacy and whistleblowing grievances.

Additionally, Spark Infrastructure has representation on the Boards and Committees – including Audit, Risk Management and Compliance, and Sustainability/ESG – of its investment portfolio companies. Its role on the Boards is to actively engage with the investment portfolio companies to drive continued performance and explore growth opportunities. Risk management is a critical component, which involves appropriately managing all supply-chain related risks including modern slavery.



Spark Infrastructure's Governance Structure after the sale of Spark Renewables (29 September 2023)

For the last three months of the reporting period, following the sale of Spark Renewables, Spark Infrastructure's corporate governance structure remained the same as above except that:

- the Spark Renewables Management is no longer a part of Spark Infrastructure's governance structure;
- the Spark Renewables employees and contractors are no longer engaged by Spark Infrastructure;
- the Spark Renewables asset management, operations and development functions are no longer a part of Spark Infrastructure's business;
- Spark Infrastructure's policies and procedures no longer apply to Spark Renewables' employees and business operations; and
- the Spark Infrastructure Board of Directors no longer have oversight of the Spark Renewables entities.

The key roles and responsibilities regarding the assessment and management of modern slavery risks also remain the same as before the sale of Spark Renewables. Spark Infrastructure continues to have representation on the Boards and Committees – including Audit, Risk Management and Compliance, and Sustainability/ESG – of its investment portfolio companies.

The governance structure depicted in the image above remains current except that Spark Renewables is no longer a part of the Spark Infrastructure Group.

Direct Operations

Until 29 September 2023, Spark Infrastructure's direct workforce comprised 18 employees and several contractors across white-collar roles such as asset management, asset operations, project development, finance, legal, and other corporate functions. Its direct workforce was engaged under individual employment agreements, that paid above the Australian minimum wage. These employees worked out of Spark Infrastructure's head office in Sydney's CBD, and the Spark Renewable team worked out of their office based in Manly (NSW).

At the close of FY2023, after the sale of Spark Renewables, Spark Infrastructure's direct workforce comprised of 10 employees and 1 contractor. All of Spark Infrastructure's employees were engaged under individual employment agreements, that paid above the Australian minimum wage. These employees worked out of Spark Infrastructure's head office in Sydney's CBD.

Spark Infrastructure's supply chain

Spark Infrastructure engaged approximately 142 suppliers in FY2023. Its 15 largest suppliers (who are all Australia-based) accounted for almost 87% of its total supplier spend.

Spark Infrastructure's suppliers can be considered in two main categories:

- Corporate – this includes suppliers engaged to support head office tasks such as information technology, audit, legal, and other corporate services, inclusive of transaction-related services. Corporate spending accounted for ~69% of Spark Infrastructure's total spend in FY2023. This mainly relates to the procurement of legal, financial and advisory services and transaction costs related to the sale of Spark Renewables.
- Spark Renewables – this included suppliers involved in the operations of Bomen Solar Farm and development of other renewable opportunities. Spark Renewables spending accounted for 31% of Spark Infrastructure Group's total spend, and related to the ongoing operation, maintenance and management of Bomen Solar Farm, legal costs, grid connection costs and costs associated with developing Spark Renewables' pipeline of new opportunities.

Approximately 99% of Spark Infrastructure's direct suppliers (by expenditure) are based in Australia, which has a low-risk rating, with one supplier based in New Zealand. In FY2023, Spark Infrastructure Group did not directly engage any suppliers from high-risk countries (as defined by the Global Slavery Index).

Notwithstanding this, Spark Infrastructure recognises that the highest risks of modern slavery are most likely to occur further down its supply chain (tier two and beyond) particularly in connection with the Spark Renewables category of suppliers. Given the sale of Spark Renewables on 29 September 2023, Spark Infrastructure considers that its risks of modern slavery in its supply chain (tier two and beyond) has reduced significantly.

Modern Slavery Risks in Spark Infrastructure's Supply Chain

Employees within Spark Infrastructure's corporate operations are skilled white-collar professionals operating exclusively in Australia, and therefore have very low levels of industry risk and geographic risk associated with modern slavery.

Although its corporate office is small, Spark Infrastructure recognises there are risks relating to the supply of IT equipment, where some components may be indirectly sourced from high-risk regions, including those with poor labour practices.

Operations relating to Spark Renewables were a higher risk than Spark Infrastructure's corporate office given the expanded scope of its procurement activity and reliance on components that are often imported from jurisdictions with higher prevalence of modern slavery. In FY2023, Spark Renewables did not undertake any construction or significant procurement exercises, which naturally lowered the associated risks of modern slavery, however there were activities involving installing wind and solar resource monitoring equipment on prospecting sites.

Prior to the sale of Spark Renewables on 29 September 2023, the products within the supply chain that had the highest levels of modern slavery risks for the Spark Infrastructure were:

Known supply chain risks	Modern Slavery Risk
Solar Panels and related components	Much of the manufacturing of solar panel parts occurs in China, which is considered a higher-risk nation. In particular, the industry has faced concerns about the mining, purification and transformation of the polysilicon used in solar panel production.
Operational Equipment	Electricity infrastructure materials and components such as capacitor bank, communications board, etc. used within the industry often have long supply chains that extend into countries with relatively weak or opaque commitments to human rights, including China, India, Vietnam and Thailand.
Personal Protective Equipment	The Global Slavery Index identifies apparel and clothing accessories as one of Australia’s largest importing risks, citing China, Vietnam, India and Thailand (among others) as the prominent sources.
Office IT Equipment	The production of laptops, computers and phones is considered at risk for modern slavery practices. Many components are manufactured in high-risk countries, including China and Malaysia which are the primary suppliers to Australia.

After the sale of Spark Renewables, Spark Infrastructure’s modern slavery risks in its supply chain have significantly reduced. Apart from procuring Office IT equipment, which continues to present a high level of modern slavery risk, Spark Infrastructure has not and will not be purchasing equipment which has components manufactured in high-risk countries, including China and Malaysia. The suppliers engaged are to support the Spark Infrastructure head office tasks such as information technology, audit, legal, and other corporate services, inclusive of transaction-related services and are largely based in Australia.

Managing Modern Slavery Risks in Spark Infrastructure’s Supply Chain

Spark Infrastructure maintains and implements a range of policies and procedures which help mitigate modern slavery risks in its operations and supply chain.

These include:

- **Code of Conduct** – Outlines the way employees are expected to conduct themselves to uphold the integrity and values of Spark Infrastructure, including procurement practices, equal opportunity and anti-discrimination, Occupational Health and Safety, bribery and corruption, community contribution and environment.
- **Speak Up (Whistleblower) Policy** – Provides framework for anyone with information about potential misconduct to report the information. This can be done anonymously if required.
- **Risk Management Policy** – Describes the risk framework under which Spark Infrastructure operates. This includes risks associated with supply chain management.
- **Supplier Management Policy** – Details the technical and operational expectations from Spark Infrastructure’s suppliers and requires a Supplier Register to be maintained which details the important terms/contract clauses between Spark Infrastructure and its suppliers.

These policies apply to all employees of Spark Infrastructure and applied to the employees of Spark Renewables until 29 September 2023. They are regularly reviewed and updated to ensure effectiveness and appropriateness for prevailing circumstances.

Minimising Modern Slavery Risks in Spark Infrastructure's supply chain

Spark Infrastructure implements the following procedures to understand modern slavery risks and to minimise the likelihood of modern slavery occurring in its supply chain:

- **Prospective supplier due diligence** – Spark Infrastructure's Supplier Management Policy outlines the technical and operational expectations from Spark Infrastructure's suppliers and requires a Supplier Register to be maintained which details the important terms/contract clauses between Spark Infrastructure and its suppliers. The Policy also sets out an approval procedure by Spark Infrastructure's Management for onboarding a new supplier. A 'supplier questionnaire' is required to be sent to prospective suppliers under the Policy, which covers questions on the supplier's compliance with modern slavery laws and the policies and procedures the supplier has in place to identify and mitigate modern slavery risks in its supply and value chains. The responses provided by the prospective supplier in the questionnaire are thoroughly reviewed and assessed for any modern slavery risks that may need to be mitigated before onboarding the supplier.
- **Ongoing supplier due diligence** – Spark Infrastructure regularly reviews the performance and compliance of its suppliers and requires certain suppliers to complete a modern slavery questionnaire, designed to understand supplier awareness and management of modern slavery risks based on the processes and systems they have in place. In FY2023, questionnaires were sent to suppliers who represented 94% of total procurement expenditure.
- **Training** – Spark Infrastructure has engaged an external provider to conduct training on modern slavery for all employees of the Spark Infrastructure and to assist in the preparation of training materials for future training sessions.
- **Reporting** – Spark Infrastructure requires regular reporting from current suppliers as to their compliance with laws and regulations, the appropriate functioning of processes and systems, stakeholder engagement and complaints, and training provided to employees, among other factors.

Remediation

If a supplier is found to be violating human rights or modern slavery laws, Spark Infrastructure will carefully consider a range of remediation options available to it, noting that the most appropriate remediation action(s) will vary on a case-by-case basis. These actions include direct engagement with suppliers or impacted rights holders to rectify issues, exploring opportunities for cross-industry collaboration to impact industry change, inviting the involvement of legal or regulatory authorities, and/or contract termination. When determining the appropriate course of action, Spark Infrastructure's focus will always remain on mitigating the risk to those experiencing the possible impacts of modern slavery and using its leverage to foster continuous improvement.

Spark Infrastructure's Speak Up (Whistleblower) Policy is a key component of its approach to identifying and remediating instances of modern slavery present in its operations and supply chains. The Speak Up Policy encourages anyone with information about potential misconduct, which includes concerns over modern slavery, to report the information to specific individuals named in the Policy. The Speak Up Policy clearly identifies its applicability to current and past employees, directors, consultants, contractors, suppliers and associates. Individuals who provide information to Spark Infrastructure in accordance with the Speak Up Policy can do so anonymously. Spark Infrastructure is committed to upholding the legal protections afforded to individuals who report potential misconduct and making sure such individuals are treated fairly and do not suffer detriment. The Spark Infrastructure Board receives a summary of reports made under the Speak Up Policy.

There were no confirmed instances of modern slavery within Spark Infrastructure's operations or supply chain brought to the Board's attention in FY2023. There were also no instances of modern slavery identified in the operations and supply chains of its investment portfolio companies in FY2023.

External advisory services

To ensure Spark Infrastructure continues to promote best practices, it has engaged BWD, an advisory firm specialising in business sustainability strategy, to perform a full review of the Statement.

Assessing Effectiveness

Spark Infrastructure is committed to regular evaluation of its modern slavery approach and acting to continuously improve its practices over time. It implements a range of activities designed to understand the effectiveness of its modern slavery risk management, such as:

- Review policies and procedures regularly to ensure they are kept in line with industry best practice and any evolving regulatory requirements;
- Review of supplier responses to due diligence activities and supplier questionnaires to identify potential risks and to understand the risk mitigation strategies the supplier has in place along with assessing if the processes of the supplier adequately address the risks, including comparing responses to previous years to help identify potential emerging risks;
- Complete yearly review of its risk profile, led by the Audit, Risk and Compliance Committee;
- Engage industry experts to review and recommend improvements to its modern slavery and supply chain management practices; and
- Review investment portfolio companies' modern slavery risks, mitigation actions and modern slavery statements both informally and formally via Board representation.

Given the nature of Spark Infrastructure's current operations and supply chain and that Spark Infrastructure no longer owns Spark Renewables, the above measures are considered appropriate and commensurate to the existing potential levels of risks of modern slavery within the supply chain. Any potential risks identified by Spark Infrastructure in its supply chain will be notified to its Board in a timely manner for addressing.

Spark Renewables (until 29 September 2023)

In FY2023, Spark Renewables continued to build on its commitment to mitigating modern slavery risks in its supply chain. In addition to its operational asset Bomen Solar Farm, Spark Renewables has a development portfolio comprising early-stage batteries, and wind and solar farms.

Spark Renewables' Operations and Supply chain

Spark Renewables employed 8 employees and several contractors, who were all professionally qualified and based in Australia. Within Spark Renewables, protections against modern slavery are operationalised through Spark Infrastructure's Speak Up (Whistleblower) Policy (which is available for anonymous reporting of any unethical conduct), Risk Management Policy and Procurement (incl External Service Providers) Policy.

Spark Renewables directly engaged a total of 110 suppliers until 29 September 2023, out of which 109 suppliers were based in Australia, a country with a low geographic risk rating. The 5 largest suppliers accounted for 50% of total spend and were all based in Australia. Where possible, Spark Renewables includes provisions in contracts requiring local counterparties to investigate and prioritise local procurement opportunities.

The largest supplier until 29 September 2023 (18% of spend) was EMM Consulting Pty Limited, followed by Umwelt (Australia) Pty Limited (11% of total spend). The other services supplied by third parties (e.g. stakeholder engagement and project planning advisory, and asset management) present low risks of modern slavery, being professional services delivered in Australia.

Procurement of electrical hardware at the operating asset, Bomen Solar Farm, is largely limited to replacement parts or upgrades. In FY2023, Spark Renewables procured only limited capital equipment related to operational office equipment and pre-construction development and prospecting works. As these were low-spend capital procurements from Australian suppliers, they present low risk of modern slavery. There was no procurement in FY2023 of any equipment required for the construction of energy generation or storage projects.

A total of 34 suppliers representing 65% of Spark Renewables' total procurement spend received questionnaires in FY2023. All suppliers demonstrated their strong position on modern slavery risk management within their own supply chains, with robust policies, processes and training in place.

Victoria Power Networks



In FY2023, Victoria Power Networks (comprising of CitiPower, Powercor and Beon) (**VPN**) continued to focus its attention on risk identification, management processes, building employee awareness and knowledge through training. VPN also continued to review and revise its relevant policies and procedures to ensure they supports its management of modern slavery risks and are in line with the requirements of the Act.

Throughout FY2023, VPN had no confirmed cases of modern slavery instances raised for remediation in its supply chain. VPN's Whistleblower Program provides an effective mechanism for reporting and escalating any issues of concern to its employees or its suppliers, or their families.

Key VPN risk management measures in FY2023

1. VPN has a formal Enterprise Risk Management Framework in place 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;
2. The procurement team and other relevant team members have undertaken Modern Slavery Act training to reinforce the key objectives of the modern slavery risk management framework. The training included the broader human rights agenda, taking into account, key human rights issues within the energy services sector and an overview of VPN's process and documents. Over 500 employees of VPN have successfully completed this training;
3. Continued to abide by its Sustainable Procurement Statement, developed to ensure VPN's suppliers are aware of VPN's 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;
4. Conducted a supplier survey to understand how its suppliers are performing in relation to modern slavery obligations and the challenges they face;
5. Continued ongoing collaboration with VPN's 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;
6. Reviewed and analysed its supply chain by category and the inherent risks to formulate a plan to control and/or mitigate the risks as best as it can; and
7. Continued to ensure all applicable contracts contained anti-slavery and human trafficking provisions.

Operations and Supply chain

VPN maintains and implements a range of policies and procedures to mitigate modern slavery risks in its operations and supply chains, which include its Health and Safety Policy, Procurement and Purchasing Policy, Supplier Code of Conduct, Whistleblower Policy, Employee Handbook Code of Conduct, Enterprise Risk Management Policy and framework and ongoing Supplier compliance.

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

The products VPN buys 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.

VPN has measures in place to identify and reduce the risk of modern slavery in its supply chains. VPN’s Supplier Code of Conduct 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 VPN’s position regarding the intent to comply with the Act and also detail the expectations of its 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 VPN’s Supplier Code of Conduct including Modern Slavery requirements.

When choosing the right suppliers, VPN takes into account a range of non-price factors including safety performance, labour practices and values alignment, and supporting the communities in which it operates.

VPN’s modern slavery risks

In FY2023, VPN once again conducted a modern slavery risk-mapping assessment. The analysis was undertaken on VPN’s operational and supply chain procurement activities focusing on supplier expenditure by sector, risk and geography. Based on supplier industry and expenditure, VPN’s top three key risk sectors continue to be classified as construction, electrical equipment and employment services – each of which has a unique risk profile.

At-risk sectors	Why is this sector at risk of modern slavery?
Construction and Engineering	<ul style="list-style-type: none"> • Sector characterised by large and complex international supply chains as well as local and overseas manual labour. • Sector sources goods and materials from countries or geographic regions with the potential of weaker working conditions and regulations.
Electrical Components and Equipment	<ul style="list-style-type: none"> • Like construction, the electronics industry typically has long international supply chains for its raw materials manufacture and product assembly.
Human Resources and Employment Services	<ul style="list-style-type: none"> • 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.

In future

In 2024, VPN plan 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 its ability to review and manage supplier performance. The solution called Felix will also assist with regards to VPN’s 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 VPN’s 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 VPN’s risk assessments for all categories of supply.
5. Complete a comprehensive Modern Slavery Audit on 5-7 of VPN’s Strategic suppliers’ base – approx. 10%.
6. Survey VPN’s suppliers on what they are doing to reduce the risks of modern slavery in their business and supply chain.

For more details on VPN’s approach to modern slavery, including how it assesses the effectiveness of its actions, please see its most recent Modern Slavery Statement which would be available via the [Online Register](#) for Modern Slavery Statements.

SA Power Networks



In FY2023, SA Power Networks (including Enerven) (**SAPN**) focused its efforts on actions which align with the objectives of the Act. This included (i) continuing to raise awareness within the Procurement function, across the wider organisation and with its suppliers; and (ii) identifying, reporting and addressing the risks via self-assessment questionnaires, supply chain understanding and monitoring and engagement with suppliers.

Key SAPN risk management measures in FY2023
<ol style="list-style-type: none"> 1. Engaged with various industry bodies – including The Energy Procurement and Supply Association (EPSA) and Chartered Institute of Procurement and Supply (CIPS) – to contribute towards broader industry solutions to the mitigation of modern slavery risks in the supply chain of regional utility companies. 2. Modern Slavery was included as a topic in a Whole of Business ‘Insight’ session on Sustainability which increased awareness with all staff who attended and who have subsequently viewed the recording. 3. Incorporated Responsible Supply Chain (which includes human rights) as a key pillar of SAPN’s Sustainability Strategy and SAPN’s Sustainability Report. 4. Incorporated modern slavery as a topic of discussion in supplier meetings and supplier evaluations. This is ongoing and raised awareness to all supplier staff and SAPN’s staff who attend these meetings. 5. Completion of the CIPS Ethical Procurement and Supply eLearning module by Procurement staff. This training and assessment provides ongoing awareness to SAPN’s staff involved in facilitating the selection of suppliers. 6. Increased the number of suppliers who have completed the Modern Slavery Self-assessment questionnaire both raises the awareness of suppliers and assists SAPN in understanding where the risks exist. 7. Further data gathering on the location of SAPN’s second-tier suppliers provides improved transparency of SAPN’s supply chain which, in turn, improves SAPN’s ability to identify where the risks exist.

Operations and Supply chain

SAPN employs approximately 2600 employees. This workforce is supplemented by casual employees engaged under Enterprise Agreements, equivalent to 1.0% of these figures. The policies, directives and codes which prevent the risk of modern slavery in SAPN's operations include:

- Code of Conduct;
- Fair Treatment Directive;
- HR and Ethics Policy;
- Whistleblower Directive; and
- Family and Domestic Violence Support Directive.

Within SAPN's supply chain, the vast majority of SAPN's suppliers (98% by expenditure) are based within Australia, a country with a very low risk rating. SAPN procures equipment and services that may be impacted by modern slavery risks. Energy infrastructure materials such as transformers, cables and conductor, protective equipment, as well as other products are associated with long construction and electrical components supply chains. SAPN also purchases direct services, such as asset construction & maintenance, civil services and vegetation management and indirect goods and services including professional services, facilities management and HR services. Hardware, software and services to manage and maintain the operational and information technology environment are also purchased by SAPN.

SAPN's modern slavery risks

Materials Category – Suppliers of materials are predominantly Australian based (first tier), with one single supplier being based outside of Australia. The source of the materials being manufactured is both Australia and overseas. The key risk in this category relates to materials being manufactured and components being sourced from overseas.

Direct Services Category – Direct Services category mostly requires delivery of services within South Australia, supporting SAPN's assets and projects. 78% of the suppliers in this category are South Australian based. Given the nature of the services and the location of the organisations and people providing the services, the overall risk related to this category is relatively low.

Digital Technology Category – This category consists predominantly of Australian based first tier suppliers, with a small number of suppliers based in other countries. The key concern in this category relates to the manufacture of IT hardware which is done by organisations who are widely used across both Australia and internationally.

Indirect goods and services – This category contains the largest number of suppliers with Australian small business representing 49% of the supply chain, based on number of suppliers. The inherent risk in facilities management services has been recognised with due diligence activity undertaken in 2022.

Other/miscellaneous services - This category includes suppliers who provide a range of miscellaneous services, including some utility and government services. This group consists of South Australian organisations (67%) and the overall risk is considered low.

In future

The actions SAPN has taken during FY2023 will further progress in 2024 with focus on increasing awareness and reducing modern slavery risks.

For more detail on SAPN's approach to modern slavery, including how it assesses the effectiveness of its actions, please see its most recent Modern Slavery Statement available [here](#).

Transgrid



During its 2023 financial year (1 July 2022 – 30 June 2023) (**FY2023**), Transgrid (comprising of NSW Electricity Networks Operations Pty Limited and NSW Electricity Networks Assets Pty Limited) continued to build on its commitments by further embedding modern slavery initiatives across its operation and supply chain by:

- improving its Risk Assessments by conducting a deep dive into suppliers with spend of \$250,000 and over;
- exploring additional platforms that provide predictive visibility within supply chains of up to 10 tiers;
- continuing inhouse internal training to raise awareness; and
- adopting a continuous improvement focus with internal and external stakeholders and having a dedicated resource within the business to support both.

Key Transgrid risk management measures in FY2023

1. Transgrid's Modern Slavery Working Group reviewed Transgrid's grievance mechanism and took steps to ensure the business is aware of how to identify suspicious activity and how to report it. A modern slavery reporting protocol was developed and rolled out to the business;
2. Through the risk management platform (Informed 365), Transgrid audited its active suppliers with spend of greater or equal to \$250,000, to analyse supplier compliance relating to registering and completing the Self Assessment Questionnaire (SAQ). It's top 165 suppliers with a spend of \$250,000 and greater represent 79% of its total spend during the financial year;
3. Transgrid's Social Procurement Analyst has been responsible for reviewing, assessing and scoring the SAQs and working alongside Supply Chain Sourcing and Procurement Business Partners in managing any identified potential Modern Slavery risks. The Social Procurement Analyst also advises on modern slavery contract negotiations;
4. Developed a holistic Human Rights Due Diligence Framework to help prevent and manage human rights risk, including modern slavery, and to encourage engagement, negotiation and collaboration to prevent them;
5. Developed and introduced a Modern Slavery Reporting Protocol to the business, improving how Transgrid reports any suspected modern slavery within its supply chains both domestically and internationally;
6. Continued its sector collaboration with the Energy Procurement Suppliers Association at regular meetings; and
7. Continued inhouse internal training to raise awareness on modern slavery risks.

Operations and Supply chain

Transgrid has a diverse workforce of more than 1,500 full-time equivalent employees, all based within Australia and engaged on individual contracts. Their skillsets range from engineers and power workers to professionals. 81% of its employees are protected by Transgrid's Enterprise Agreement, which is renegotiated periodically. Transgrid representatives meet regularly

with employee representatives and their union representatives to consult on changes within the business that have an effect on employees.

Transgrid has a suite of comprehensive employment policies and procedures in place, to identify, prevent, mitigate and remedy actual or potential adverse human rights impacts. Its Enterprise Agreement includes a Dispute Resolution Procedure, and a procedure on Consultation Regarding Workplace Change.

Policies and procedures include:

- Anti-discrimination, Harassment and Bullying Policy
- Fatigue Management Procedure
- Grievance Management Procedure
- Whistleblower Policy
- Our Business Ethics

As such, Transgrid considers the modern slavery risks in its workforce to be low.

Within Transgrid’s operations, its employment practices minimises the risk of modern slavery. These practices and commitments are underpinned by its Modern Slavery Policy, Code of Ethics and Conduct, recruitment and workplace grievance policies and practices, and its health and safety policies.

With all operations based in Australia, Transgrid’s greatest exposure to modern slavery exists in its supply chain. Transgrid is taking a robust, phased approach to improving transparency across its direct and extended supply chain. As an electricity transmission company, Transgrid needs to procure a wide range of products and services. Its direct supply chain primarily consists of construction, network equipment, facilities management, advisory and corporate services companies. These entities are largely headquartered in Australia.

Transgrid’s modern slavery risks

Transgrid identifies and mitigates modern slavery risk using an internally developed supplier risk matrix scoring system. Its assessment indicated four high/moderate risk categories as follows:

High and moderate supply chain risks	Why is this sector at risk of modern slavery?
Network equipment	Transformers, static var compensators, synchronous condensers, capacitor banks and HV components are primarily sourced from Asia, where international organisations report a high risk of labour exploitation in some countries.
Personal Protective Equipment	Garments manufactured offshore have been identified as one of the biggest modern slavery risks being imported into Australia.
Electronics	Hardware components and services are primarily manufactured and provided by organisations with support services based in developing countries.
Construction labour	Employment practice visibility can be limited when Tier 2 or Tier 3 companies subcontract low-skilled or unskilled labour for construction projects.

In future

Transgrid’s Modern Slavery Roadmap includes a variety of risk assessment and risk mitigation actions which are designed to reduce the potential impacts of modern slavery within its supply chain. This is supported by actions to increase the capability of its business, and the industry more broadly, to assess and address modern slavery.

Transgrid’s modern slavery goals for the coming year include introducing:

- Rules for monitoring improvements or termination with suppliers;

- A remediation guideline, including assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how the impacts are addressed;
- A modern slavery risk register;
- The newly developed supplier grievance mechanism;
- Modern slavery elements into Transgrid's tenders; and
- Embed modern slavery mitigation within Transgrid's procurement and supplier on boarding processes.

For more detail on Transgrid's approach to modern slavery, including how it assesses the effectiveness of its actions, and various case studies and deep dives, please see its most recent Modern Slavery Statement available [here](#).