

FY22 Modern Slavery Statement

For Financial Year ending 31 December 2022

Reporting Entity

This statement is submitted under section 13 of the Modern Slavery Act 2018 (Cth) for the PSPIB Power Trust ABN 64 990 011 273 (the "Trust"). This Statement has been prepared by the Trustee, Perpetual Corporate Trust Limited ACN 000 341 533, and approved by the board of directors of the Trustee on 29 June 2023.



Richard McCarthy

Director

Perpetual Corporate Trust Limited

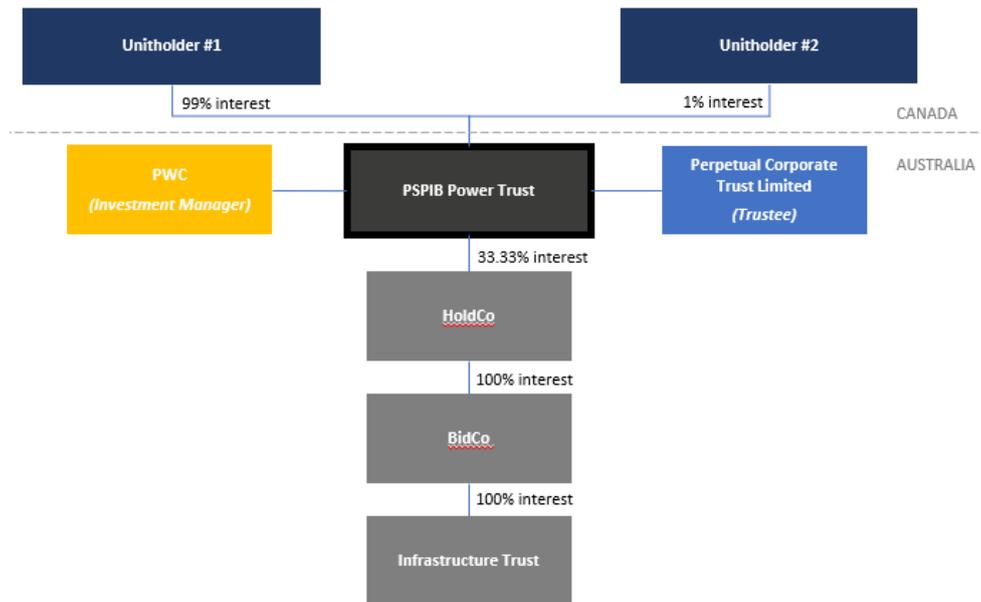
Consultation

This statement was developed in consultation with the Investment Manager, PricewaterhouseCoopers Securities Ltd. The Trust was established to invest in the Spark Infrastructure Trust, which owns and manages a portfolio of electricity infrastructure.

Structure, Operations and Supply Chain

Structure

PSPIB Power Trust is domiciled in Australia and has been in operation since 2021. PSPIB Power Trust holds shares in a holding company, which wholly owns a bid company that ultimately invests in an infrastructure trust. PSPIB Power Trust owns no real property and has no employees.



Operations

The primary operation of the Trust is the investment in Spark Infrastructure Trust which is an Australian Investment Fund with a portfolio of electricity infrastructure in Australia. Perpetual Limited’s division Perpetual Corporate Trust is trustee this Trust.

Perpetual Corporate Trust (PCT)

Perpetual Corporate Trust Ltd is an entity that is controlled by Perpetual Limited and covered in Perpetual’s modern slavery statement. PCT provides a broad range of fiduciary, agency and digital products to the debt capital markets and managed funds industries both domestically and internationally. Debt Market Services includes trustee, document custodian, agency, trust management, accounting, standby servicing, and reporting solutions. Perpetual Digital provides data services, industry roundtables, and our new Perpetual Intelligence platform-as-a-service products supporting the banking and financial services industry. Managed Funds Services provides services including independent responsible entity, wholesale trustee, custodian, investment management and accounting.

Investments

The Trust’s Assets under Management was a total of \$1.496 billion. The trust is an investment vehicle to ultimately invest in the Spark Infrastructure Group. The major asset classes were electricity infrastructure. The account domicile was only in Australia.

Supply chain

The Trust’s supply chain consists of two direct service providers. These service providers are all located in Australia.

Procurement categories for service providers are:

- Investment Management Services
- Professional services, including an accountant and tax agent

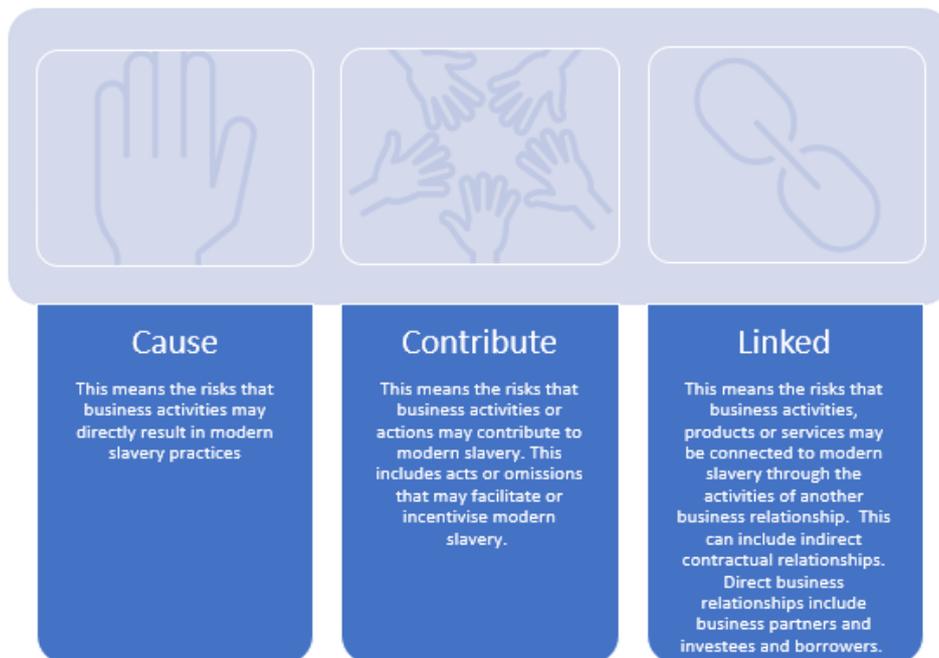
Modern Slavery Risks

The Trustee understands that modern slavery risk can occur in operations and supply chains. The Trustee considers risk assessment a critical process to identifying the inherent risk of modern slavery across the Trust. As Trustee, we conduct an annual risk assessment on all trusts that meet the Modern Slavery Act reporting threshold. The risk assessment is done separately to Perpetual Group's corporate modern slavery risk assessment and is in addition to routine due diligence activities undertaken for management of the Trust.

Defining modern slavery risks

Modern slavery is serious exploitation that undermines a person's freedom. In a situation where modern slavery occurs, a person cannot refuse or leave due to threats, violence, coercion, abuse of power, or deception¹. Modern slavery occurs in a variety of forms, there are eight types including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour².

Modern slavery risk means the potential for the Trust to cause, contribute to, or be directly linked to modern slavery through their operation or supply chain. This means looking at risks to people rather than risk to the company (such as reputational or financial damage), although often these risks are connected. The Trust recognises that COVID-19, conflict and climate change has exacerbated modern slavery risks for people in vulnerable situations³.



Risk assessment methodology

It is possible that Perpetual, as Trustee, may be linked to modern slavery via the investments and suppliers within the Trust. In FY22, the Trustee collected information on the Trust's supply chain and operations to include in a modern slavery risk assessment. Specifically, the Trustee investigated the investment trust and service providers that we have a direct relationship with. The investment trust and service providers were then assessed for inherent modern slavery risks and an inherent risk profile was determined for each entity. Inherent risk is the level of risk before any actions are taken to manage the risk's impact or likelihood.

¹ International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, 13.

² As defined in the Australian Modern Slavery Act 2018 (Cth)

³ International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), 2022. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage

Risk Assessment Results

Investments

The Trust’s investment footprint is concentrated as all of its assets are held in an underlying infrastructure fund. The FY22 risk assessment conducted by the Trustee revealed that this investment sector is considered to have higher inherent risk, as it is a part of the infrastructure industry. The below information summarises the risks in this industry. The approach to due diligence and assessment is informed by this risk profile.

Spark comprises the following electricity infrastructure assets which are heavily regulated by the Australian Energy Regulator (AER). The AER regulates the electricity networks by setting the maximum amount of revenue network businesses can earn. Network businesses will submit proposals to the AER on their required revenues every 5 years which are reviewed and determined by the AER based on factors such as projected demand for electricity, age of infrastructure, operating and financial costs, network reliability and safety standards. The decisions generally apply for 5 years, and network businesses adjust their prices annually during the 5 year period.

Asset	Interest	Asset type	Overview
SA Power Networks (SAPN)	49%	Regulated	<ul style="list-style-type: none"> South Australia’s sole electricity distributor which build, maintain and upgrade the poles, wires and substations that deliver power to around 900,000 homes and businesses.
Victoria Power Networks (VPN)	49%	Regulated	<ul style="list-style-type: none"> CitiPower and Powercor own and operate two of Australia’s largest electricity networks, supplying power to over 1.1 million Victorian households. Powercor services the western suburbs of Melbourne, while CitiPower services Melbourne’s inner suburbs and central business district. Both Powercor and CitiPower are known as VPN.
TransGrid (TG)	15%	Regulated	<ul style="list-style-type: none"> Operates and manages the high voltage electricity transmission network in NSW and the ACT, connecting generators, distributors and major end users.
Bomen Solar Farm (Bomen)	100%	Unregulated	<ul style="list-style-type: none"> 100MW Bomen Solar Farm in Wagga Wagga NSW, which generates and sells electricity and large-scale generation certificates (LGC).

Investment Sector

Inherent Risk Profile

Utilities

Companies in the utilities sector may be exposed to modern slavery risks through: the use of energy sources with links to labour exploitation, including state-imposed forced labour; use of offshore and subcontracted services, such as call centres and IT support, in regions with poor labour protections; and the use of utility machinery and infrastructure, such as wind turbines, with links to forced labour and child labour in the mining of raw materials and production.

Energy

Companies in the energy sector may be exposed to modern slavery risks through: a complex network of subcontractors and remote work on offshore rigs and supply vessels, limiting oversight of working conditions; sourcing of raw materials from high-risk regions; reliance on a migrant/subcontracted workforce excluded from unionisation and compelled to work through retention of identity documents, recruitment-related debt, and deportation threats; holding of crews on shipping vessels for extended periods; and use of child labour in coal mining in select countries.

Supply Chain

The Trustee’s FY22 risk assessment did not identify any high-risk service providers. The Trustee’s FY22 risk assessment identified that all components of the Trust’s supply chain are low risk. This is because, all service providers are professional services who operate in Australia.

Sector/Product

Inherent Risk Profile

Professional Services

There is low inherent risk of modern slavery risk in professional service providers located in Australia as these services providers tend to attract a higher skill level.

Actions to Address Modern Slavery Risks

It is impracticable for the Trust to address modern slavery risks in parts of its operations or supply chains in the same way that a company would. That is because the Trust has limited operations and supply chains, and has limited control over its investments. For example, the Trust does not make management decisions with respect to the Spark Infrastructure Trust or the operations of the underlying electricity infrastructure assets.

The Trust's approach to addressing modern slavery risks is as follows. Perpetual has a process for all trusts to follow for modern slavery reporting. This process includes:

- Engaging with investment managers to ensure they are aware of the modern slavery reporting obligations and seeking their input to Modern Slavery Statements;
- Training for the Trust's Client Managers conducted by our Sustainability and Modern Slavery Manager; and
- Utilising a risk assessment tool to conduct a fit-for-purpose risk assessment of service providers that the Trust directly engages with.

As a trust within the PSPIB's PwC Investment portfolio, the Trust is subject to the following group-wide modern slavery, and broader ESG, policies and controls.

The Investment Manager, PwC Australia, has submitted a Modern Slavery Statement ("PwC Statement"), as required under the Australian Modern Slavery Act 2018, since FY20. The PwC Statement outlines how PwC identifies, assesses and addresses modern slavery risks to people in their operations and supply chains.

PwC has prepared a 2022 Transparency Report and in FY22, PwC continued to take their ethical responsibilities seriously, and review and strengthen their approach to human rights issues across their operations and supply chains.

- Globally, PwC has been a signatory to the United Nations Global Compact since 2002 and prepares the UN Global Compact Communication on Progress on a global basis.
- PwC has set an expectation for the same level of integrity and business conduct from their suppliers as from their own people, as outlined in their Global Third-Party Code of Conduct. This includes expectations that their suppliers shall not engage in or support human trafficking or modern slavery, including forced, bonded or involuntary labour.
- PwC expects its suppliers to maintain working conditions that meet internationally declared human rights and standards.
- PwC's collaborative procurement practices enable them to be fair, responsible and sensitive to the needs of their stakeholders while encouraging suppliers to manage their own environmental performance.

Due Diligence

Risk assessment

The Trustee's annual risk assessment was conducted to assess the Trust's inherent modern slavery risks. The results of the risk assessment are used to prevent, identify and address modern slavery risks that may exist within the Trust's supply chain.

Investments

PSPIB Power Trust holds units a property trust, which is managed by Spark Infrastructure. Modern slavery risk is assessed and managed at the asset level by the asset manager, i.e. Spark Infrastructure. As required by law in Australia, Spark Infrastructure issues an annual Modern Slavery Statement and has established Modern Slavery Frameworks which set the organisation's approaches to modern slavery. The FY21 annual statement can be found [here](#), and covers all aspects of property development and management including the asset management supply chain, development supply chain and operation and corporate supply chains.

Supply Chain

The FY22 risk assessment did not identify any high-risk service providers.

The Trust also engages with suppliers and other entities on modern slavery by requesting Modern Slavery provisions be included in service provider agreements

Remediation

As a Trustee, Perpetual may be linked to modern slavery through our business relationships with other entities via their own investments and supply chains. It is unlikely that Perpetual in its role as Trustee will cause or contribute to modern slavery, however we could be linked to modern slavery via business relationship further down the investment or supply chain of the entities for which we are the Trustee. This could include the electrical infrastructure that is the core business purpose of the entity or even electrical goods like laptops and mobile phones that the professional services who support this Trust use. This is why we engage with the Investment Managers to understand their approach to managing modern slavery in their respective entities.

Perpetual Group's remediation approach is outlined in our Modern Slavery Framework. Should an incident of modern slavery occur in a Trust which we have 'caused or contributed' to, we would engage with the Investment Manager and act in accordance with our remediation principles.

The purpose of remediation is to ensure Perpetual takes reasonable steps to:

- Address the underlying root causes driving the modern slavery if possible;
- Prevent the modern slavery impact from re-occurring by collaborating, supporting remediation and monitoring the implementation of remedial measures taken by another party; and
- Ensure compliance with national and international labour and human rights standards.

Our remediation process has been approved by Perpetual's Executive Committee and has been captured in our Modern Slavery Framework. The process details specific steps that we will take if Perpetual has 'caused or contributed' to modern slavery.

Our approach to remediation is led by a set of guiding principles. These include ensuring that our actions are in the best interest of the suspected victim or victims and responding in a way that is appropriate to the circumstances of the situation.

The principles also articulate that we will take steps to prevent further harm to achieve the best possible outcome for the victim or victims and consider whether there is any action that Perpetual can take that may address the underlying structural factors that have contributed to the exploitation.

Our Modern Slavery Framework, including the remediation process, is available to our employees on our intranet.

Grievance mechanism

Modern slavery is a form of reportable misconduct under Perpetual's Whistleblower Policy. Through this mechanism, employees can report any concerns to a Whistleblower Protection Officer within Perpetual or anonymously through our third-party whistle-blower hotline. Training on how to access and report through this mechanism are provided in our employee-wide modern slavery training program.

Measuring the Effectiveness of Actions

Outlined below is the key progress made by the Trustee on behalf of the Trust in FY22 and the actions for FY23.

FY22 progress:

- Mapped the Trust's supply chain to identify the different sectors our service providers are from
- Conducted annual risk assessment to determine inherent modern slavery risks
- Reviewed and updated our process for assessing and reporting on modern slavery in Trusts
- Engaged with the Attorney General's Department to seek feedback on our Modern Slavery Statements for Trusts

Actions for FY23

- Monitor emerging global trends in modern slavery and include anything relevant for the FY23 risk assessment
- Commitment to have trust statement reporting process reviewed annually internally
- Review and update modern slavery training for Trust Managers
- Develop SMEs within the Trust team to improve engagement and reporting

Appendix

Appendix 1: Australian Modern Slavery Act – Mandatory Reporting Criteria

The following table describes the location of each mandatory reporting criteria within the FY22 Modern Slavery Statement.

Mandatory Reporting Criteria	Location in Statement
Identify the reporting entity	Reporting Entity, Page 1
Describe the reporting entity's structure, operations, and supply chains	Structure, Operations and Supply Chain, Page 1-2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks, Page 3-4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions to Address Modern Slavery Risks, Page 5-6
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring the Effectiveness of Actions, Page 7
Describe the process of consultation and any entities the reporting entity owns or controls	Consultation, Page 1