



SGSPAA GROUP 2023 MODERN SLAVERY STATEMENT



ABOUT THIS STATEMENT

This statement has been prepared in accordance with the Australian Modern Slavery Act 2018 (Cth) ('the Act') by the reporting entity SGSP (Australia) Assets Pty Ltd (ABN: 60 126 327 62) ("SGSPAA", "the Company") and its 38 subsidiaries (collectively "our Group") for the year ended 31 December 2022. The Company's registered office is Level 16, 567 Collins Street, Melbourne, Victoria. SGSPAA makes this single joint statement on behalf of all reporting entities in the Group. All subsidiaries are incorporated in Australia and 100 percent of their share capital and units issued are owned by the Group, a list of which can be found in SGSPAA's Financial Report for the year ended 31 December 2022. This statement outlines the actions the Group has taken to assess and address modern slavery risk. It has been prepared with consultation and engagement across the Group as a whole.

Our Group holds a 50 per cent interest in the ActewAGL Distribution Partnership, primarily operating as "Evoenergy", and a 34 per cent interest in United Energy Distribution Holdings Pty Ltd. These entities are not controlled by the Group and therefore are not covered by this statement. This statement was approved by the board of SGSPAA on 7 June 2023.

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

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

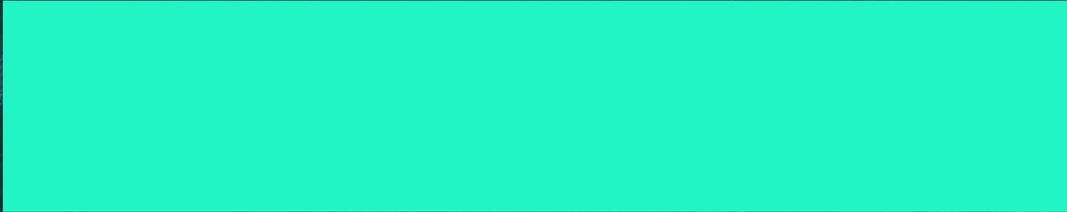
WHAT IS MODERN SLAVERY?

Modern slavery is an umbrella term for situations in which a person is forcibly or subtly controlled by an individual or a group for the purpose of exploitation. Examples include: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and illegal forms of child labour¹.

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

¹ Source: Commonwealth Modern Slavery Act 2018 - Guidance for reporting entities (homeaffairs.gov.au)

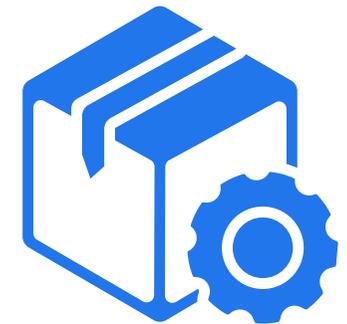
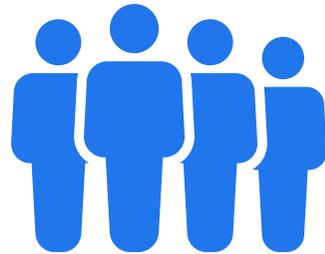
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BRINGING ENERGY TO LIFE

OUR VISION

Creating sustainable energy solutions with communities.



Part of the Australian energy landscape

We operate some of the country's most important energy assets and have a detailed understanding of the Australian energy market and policy environment.

Supporting local communities

We seek to be an active member of communities in which we operate. We are committed to working with local groups to leave a positive legacy, particularly to help address disadvantage.

Transitioning to a low-carbon future

We're advancing efforts to transition to a low-carbon future, while continuing to deliver reliable energy to Australian homes and businesses.

Tackling modern slavery

We're advancing efforts to tackle modern slavery risk exposure across our supply chain and operations while providing broad leadership across the energy sector.

MESSAGE FROM OUR CHAIRMAN AND MANAGING DIRECTOR

In 2022, against a backdrop of cost-of-living pressures, inflation, and turmoil in the international energy market, together with ongoing impacts on supply chains following the COVID-19 Pandemic, our Group has continued to focus on implementing our strategy to tackle the risk of modern slavery.

With the complexity of modern, global supply chains, and businesses' imperative to reduce costs, the risk that vulnerable people may be exploited to provide goods and services remains.

Our analysis shows the risks to our business have remained fairly consistent year-on-year – when we purchase equipment, materials and services which require an offshore workforce at some stage in the supply chain, we have decreased visibility of labour practices.

To mitigate against this, our Group has continued to focus on communicating our modern slavery position and risk management processes to both our people and the companies from which we procure goods and services.

In 2022, 428 of our suppliers completed our modern slavery questionnaire, which details their supply chains to provide assurance that modern slavery risks are being appropriately

identified and managed. This is in tandem with efforts to rationalise the number of suppliers we use across the business, which in part, is intended to better manage our modern slavery risk.

We have also continued to improve our monitoring of international and Australian information, including information shared by our energy industry partners through the Energy Procurement Supply Association.

We enhanced our ability to capture and share this information more effectively across our business and the wider energy sector through the Informed 365 digital platform, and improved our training for our staff, together with the systems they use. We also updated and strengthened our Group Code of Conduct in November 2022, with more guidance for our people about a number of matters, including our expectations for how they procure and contract goods and services.

These steps have further embedded an understanding of modern slavery and associated issues across our business and with our suppliers.

Welcome to our Modern Slavery Statement 2023, which provides an overview of this important work.



Jiang Longhua
Chairman

A handwritten signature in black ink, appearing to read 'Jiang Longhua'.



Frank Tudor
Group Managing Director

A handwritten signature in black ink, appearing to read 'Frank Tudor'.

ABOUT US

We are a \$12.4 billion energy infrastructure company which – under our Jemena brand – owns and operates some of Australia’s most significant electricity and gas distribution and transmission assets.

We deliver gas directly to more than 1.5 million homes and businesses in New South Wales and electricity to over 370,000 customers in Victoria. Our extensive network of natural gas transmission pipelines connects gas from major points of supply to urban and regional centres where it is used to power our nation’s industries and produce many of the products we use every day.

Through our engineering management and construction company, Zinfra, we are helping to construct the energy system of the future, by partnering with leading energy companies across the country.

We employ more than 2,800 people who are located across Australia in places like Sydney, Melbourne, Brisbane, Tennant Creek in the Northern Territory, and Mount Isa in Queensland. Our Group has equity interests in ActewAGL (EvoEnergy) and United Energy, and is backed by our shareholders Singapore Power and State Grid Corporation of China.

WE'RE OWNED BY

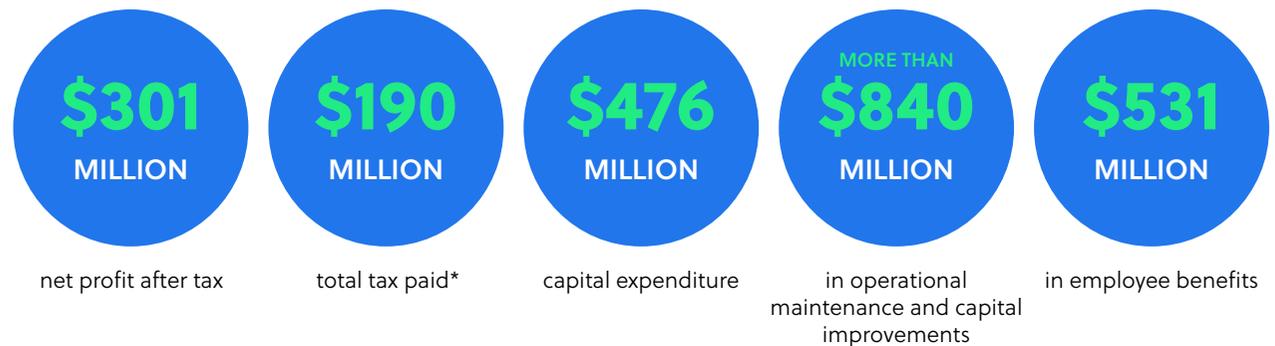


OUR BRANDS CONSIST OF



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

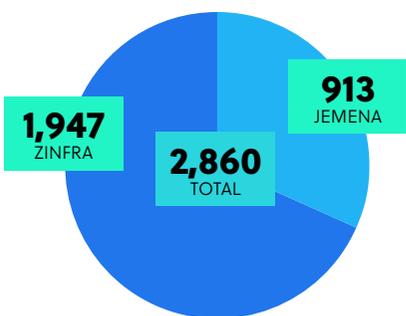
SCALE OF OUR GROUP



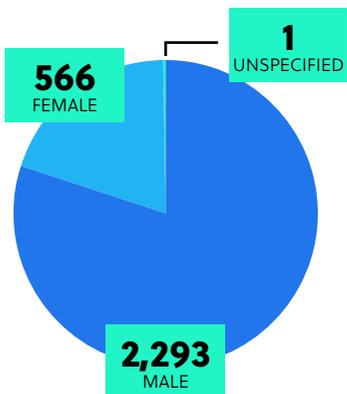
*Total tax paid for CY2021. 2022 income tax return to be lodged in July 2023

EMPLOYEE AND CONTRACTOR WORKFORCE BREAKDOWN

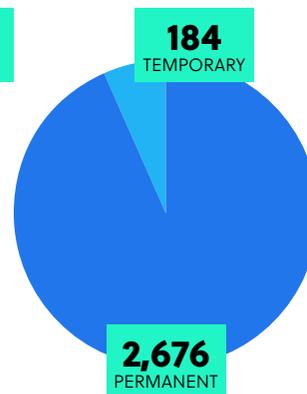
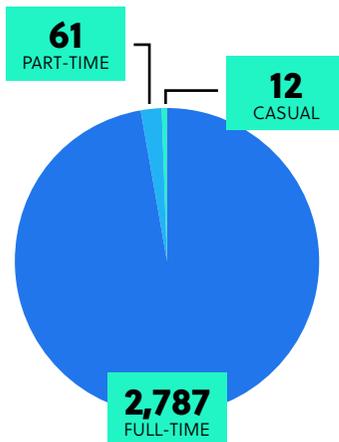
Overall



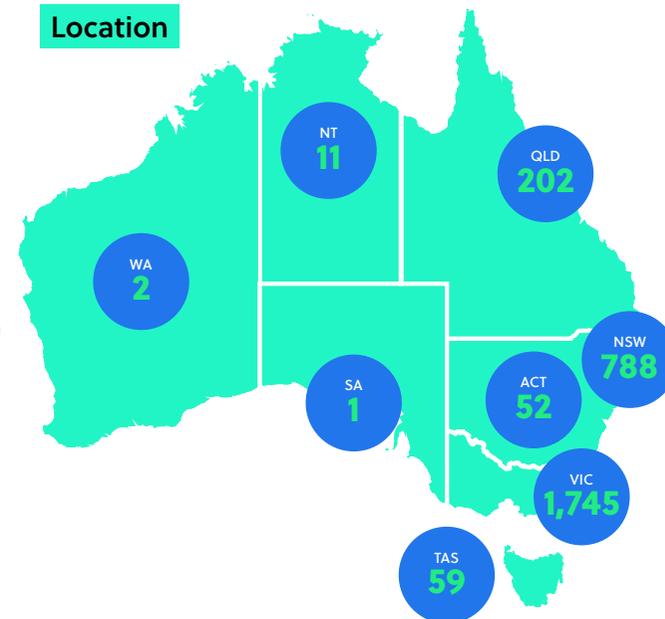
Gender



Work type



Location



	VIC	NSW	QLD	TAS	ACT	NT	WA	SA	TOTAL
NOT SPECIFIED		1							1
FEMALE	345	184	20	4	11		1	1	566
MALE	1,400	604	181	55	41	11	1		2,293
TOTAL	1,745	788	202	59	52	11	2	1	2,860

	VIC	NSW	QLD	TAS	ACT	NT	WA	SA	TOTAL
TEMPORARY	106	65	8	5					184
PERMANENT	1,639	723	194	54	52	11	2	1	2,676
TOTAL	1,745	788	202	59	52	11	2	1	2,860

OUR LOCATIONS

Gas/Electricity

- 1 ActewAGL Distribution Partnership (50%)

Gas

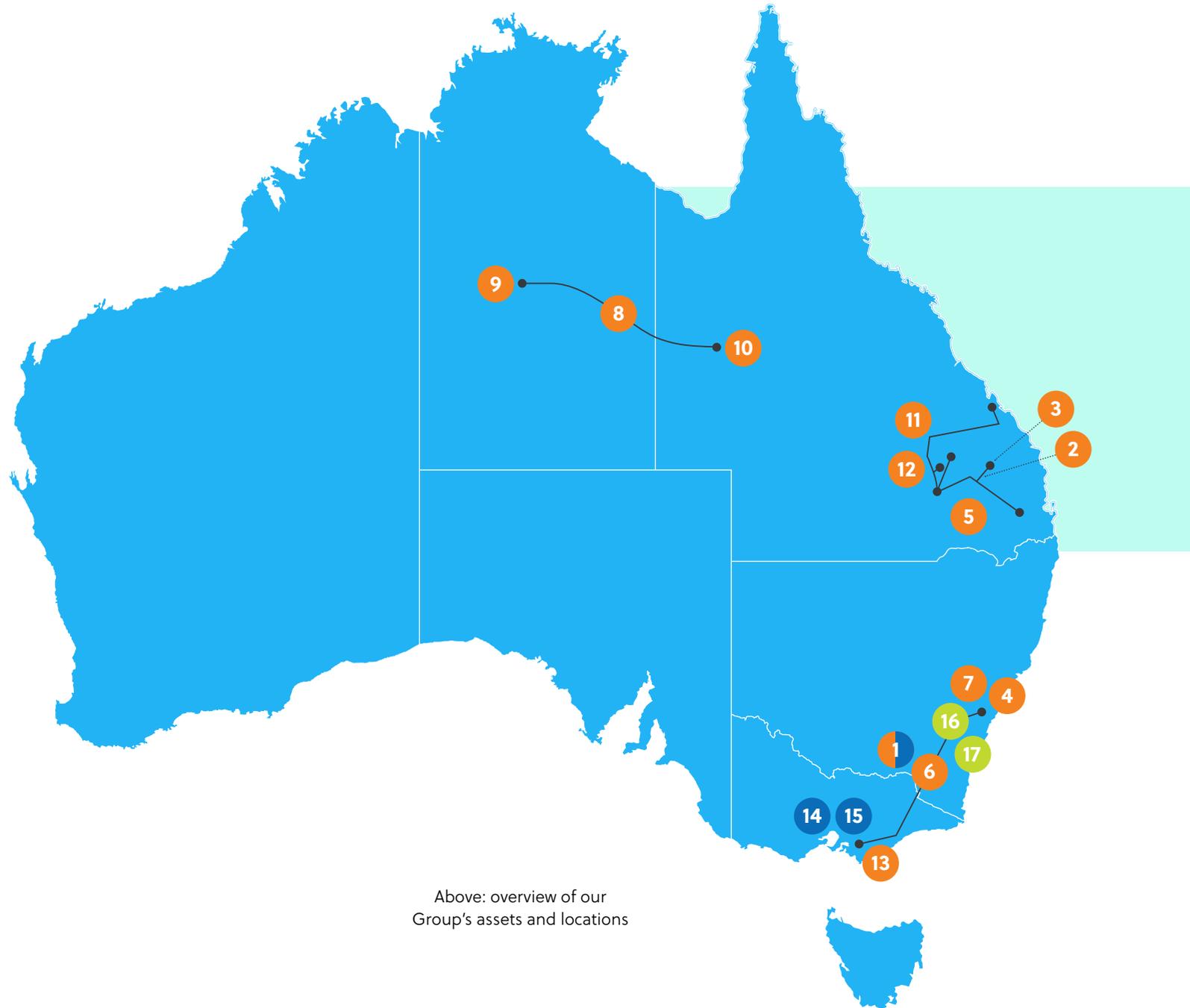
- 2 Atlas Gas Pipeline
- 3 Atlas Gas Processing Facility
- 4 Colongra Gas Transmission and Storage Pipeline
- 5 Darling Downs Pipelines
- 6 Eastern Gas Pipeline
- 7 Jemena Gas Network
- 8 Northern Gas Pipeline
- 9 Phillip Creek Compressor Station
- 10 Mount Isa Compressor Station
- 11 Queensland Gas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

Electricity

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

Renewable Gas Demonstration Projects

- 16 Western Sydney Green Hydrogen Hub
- 17 Malabar Biomethane project (under construction)



Above: overview of our Group's assets and locations

OUR GOVERNANCE AND POLICY FRAMEWORK

A robust governance and policy framework underpins our Group's efforts to tackle modern slavery risks within our operations. These outline how we manage our people, as well as the actions and behaviour expected of them when dealing with and appointing suppliers. The framework reflects our values: *We Care, Think Like a Customer, Better Together, Be Accountable and Find a Better Way.*



We care

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



Think like a customer

Our actions consider our customers, community, and other stakeholders



Better together

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



Be accountable

We accept responsibility to deliver our commitments



Find a better way

We find improved and innovative ways to work

CODE OF CONDUCT

Our Group Code of Conduct was updated in November 2022. It clearly explains the standard of behaviour our people are expected to uphold at all times. The updated Code of Conduct links to our values and all relevant laws and regulations. The Code applies to employees across our Group, as well as our suppliers, and ensures we continue to uphold the loyalty and trust of our stakeholders – our customers, clients, government representatives, suppliers and fellow team members included – and serve our community for a long time to come. It commits us both to caring for the people in our operations and across our supply chains. Our people receive annual mandatory Code of Conduct training.

WHISTLEBLOWER POLICY

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

A copy of our Group's Whistleblower Policy is available on request or via our Group entities' websites.

PROCUREMENT AND CONTRACTING POLICY

Our Procurement Policy commits us to taking a fair and commercially sound approach to our dealings with suppliers. In 2022, we commenced integrating our Procurement Policy into our Contracting Policy so we have a single policy that expressly addresses our commitment to mitigating modern slavery risks across our supply chains.

REMUNERATION

Our Group reward standard aims to maintain fair and equitable rates for all employees based on their performance and in comparison with competitive rates in the market. We aim to encourage, recognise and reward strong performance, and provide a remuneration framework that is scalable, flexible and consistent. Remuneration is reviewed for all roles at least annually.

PAYMENT TIMES REPORTING SCHEME

In 2021 the Group put in place systems and processes to effectively identify small businesses within its supply chain and report on payment times, as part of our commitment to good practice in procuring goods and services. In 2022, the group has continued to monitor and track payment times and submit the results as required under the Payment Times Reporting Scheme. This regime is intended to help small businesses enhance cash liquidity, ability to operate, pay staff and invest in their business.

OUR SUPPLY CHAINS

TABLE 1.0: TOP SPEND CATEGORIES 2022

SUPPLY CHAIN CATEGORY	SPEND CATEGORY	DESCRIPTION
Asset maintenance services 	Traffic management services	Traffic management services provided during the maintenance and repair of infrastructure.
	Field services	On-call standby and routine maintenance services, management of minor construction activities and emergency response services to metropolitan and country areas.
	Metering services	Meter-reading services for metered networks.
	Easement (vegetation) maintenance	Vegetation and easement-related services to networks.
Asset-related services 	Aerial photography	Aerial surveillance services to networks and pipelines.
	Gas pipeline services	Miscellaneous services to gas assets including liquid coating, erosion repair, permit issuer, secondary standby and site surveying.
Digital 	IT services	Professional services and support, cloud services, and data services.
Corporate services 	Cleaning services	Commercial cleaning of all facilities.
	Safety equipment and workwear	PPE clothing, wet weather gear and boots, facial protection, alcohol and drug testing.
	Human Resources, contractors and temporary field labour	Recruitment, learning and development.
	Security services and equipment	Static and manned security.
	Logistics	Warehousing and transport.

SUPPLY CHAIN CATEGORY	SPEND CATEGORY	DESCRIPTION
Professional services 	Engineering and design services	Asset-related engineering and design services.
	Equipment and materials	
	Meters and parts supply	Electricity and gas meters, modems, software.
	Line hardware	Clamps, lugs, links, brackets, insulators and crossarms.
	Cables	Power cables, fiber optic cables, conductors, cable covers and electrical cables.
	Switchgear	Switchgear and circuit breakers.
	Transformers and substations	Distribution transformers, power transformers and kiosk substations for electricity networks.
	Poles	Timber, concrete, steel and transmission towers.
	Rotating equipment	Compressors and pumps.
	Valves	Valves and actuators.
	Pipes, fittings and hoses	Gaskets and seals, pipe, tube and fittings.

RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Our Group has continued its commitment to understanding and addressing modern slavery risks within our supply chains and our organisation. In 2022, as we continued to review our business operations, we found:

1. Within our internal operations the risk of modern slavery is still considered low given the highly regulated nature of our business, and given our operations are solely in Australia (which at a country level has a low inherent risk of modern slavery) and our robust labour practice controls.
2. Our greatest area for modern slavery risk relates to our suppliers and broader supply chains. We have continued to engage with our suppliers through our Informed 365 platform to better understand the risks.

Capturing and sharing information with Informed 365

In conjunction with the Energy Procurement Supply Association (EPSA) consortium, we partnered with Informed 365 to launch a pilot digital platform in 2021 to capture supplier information and potential Modern Slavery risk. The program was aimed at developing and implementing a standardised supplier self-assessment questionnaire. This allows us to screen suppliers for modern slavery risks and streamline supplier engagement across our supply chains, resulting in reduced time and effort for all parties. Following the success of the pilot, the Informed 365 digital platform was formally launched in 2022, and the EPSA consortium has worked throughout the year to enhance the platform.

The categories of goods and services that the energy industry typically procures that pose the highest risks to human rights are outlined in Table 2.0 Key Supply Chain Risk Categories (on the following page).

Factors that continue to contribute to higher human rights risks in these supply categories include:

- increased risk of modern slavery in certain industries or countries
- visibility and oversight of supplier labour practices
- supplier capability and transparency
- likelihood of unskilled, temporary and child labour.



KEY SUPPLY CHAIN RISK CATEGORIES

TABLE 2.0: KEY SUPPLY CHAIN RISK CATEGORIES⁴

SUPPLY CHAIN CATEGORY	TYPE	DESCRIPTION OF KEY RISK AREAS
Corporate services 	Cleaning services	Low visibility over labour practices given service happens after hours.
	Safety equipment & workwear	Low visibility over contractors' practices (wages, working hours) can exacerbate threat.
	Human resources, contractors & temp field labour	Potential lack of labour practices and transparency of manufacturing processes.
	Security services & equipment	PPE clothing, wet weather gear and boots, facial protection, gloves, alcohol and drug testing.
	Logistics	Temporary nature and skill levels present risks.
Digital 	IT services	Patrolling and guards are usually outsourced - temporary nature of work and low-skilled nature of work means higher risk.
Asset maintenance services 	Traffic management	Risks associated with international logistics and labour practices.
Equipment and materials 	Meters, parts supply	Raw materials extraction and labour practices visibility.
	Line hardware	
	Cables	
	Switchgear	

⁴ Adapted from Energy Procurement Supply Association, Respecting Human Rights in our Supply Chains, 2019: https://epsaonline.net/media/uploads/white_papers/EP_SA_Respecting_Human_Rights_in_our_Supply_Chain.pdf

OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

CONTINUING OUR WORK WITH THE ENERGY PROCUREMENT SUPPLY ASSOCIATION

Our partnership with the Energy Procurement Supply Association (EPSA) continues to be critical to our efforts to address modern slavery risks. Working with our peers across the energy industry who face similar challenges means we can share information about emerging issues.

Throughout 2022, EPSA members, including our Group, met monthly to continue to enhance the Informed 365 platform and address the likelihood and consequences of modern slavery risks across any shared industry supply chain categories identified using the joint white paper: *Respecting Human Rights in Our Supply Chains (2019)*.

The work carried out by EPSA has led to the following Informed 365 platform outcomes:

- enhanced reporting functionality and a dashboard of supplier risk summaries
- standardisation of risk ratings and definitions
- development of instructional user training videos for the platform
- enhancements to support multiple languages.

OUR MODERN SLAVERY WORKING GROUP AND ACTION PLAN

Our Group's response to modern slavery risks continues to be led by our Modern Slavery Working Group, which has representatives from our Group's Procurement, Legal, Human Resources and Corporate Affairs teams, together with other business units. Its work has received support and endorsement from our Managing Director and Executive Leadership Team.

In 2022, the working group has continued to lead the implementation of our Modern Slavery Action Plan, and its six key phases – Commit, Assess, Adapt, Address, Track and Communicate.

Key achievements in implementing this plan included:

- members of the Modern Slavery Working Group have delivered a series of enhancement activities that has led to strengthening our governance
- continuing to expand our Modern Slavery Action Plan and delivering activities
- increased supplier completion of modern slavery questionnaires
- continued training on modern slavery awareness and issues
- formalised our modern slavery response into our Group Environmental, Social and Governance (ESG) Plan, with a clear connection to our corporate strategy.



OUR WORKING GROUP ACTIONS

Throughout 2022, our group has continued modern slavery work and has delivered a series of governance, supplier engagements, system enhancements and group awareness and training activities.

 Commit	 Address	 Assess	 Track	 Adapt	 Communicate
<ul style="list-style-type: none"> Delivered actions against our modern slavery work program. With the launch of our Group's new risk assessment and management tool we have enhanced our process to capture supply chain and operational modern slavery risks. Engaged with industry and suppliers through performance meetings to review ongoing modern slavery progress, raise awareness and provide training to suppliers and monitor progress. 	<ul style="list-style-type: none"> Continued our partnership with EPSA, to deliver enhancements to the Informed 365 platform in relation to our supplier assessment questionnaire (SAQ). We have now over 428 completed SAQ's from our suppliers which provide insights to their modern slavery risks and mitigation practices. Monitored government and digital information hubs relating to sanctions and modern slavery risks. Worked with industry peers and external bodies, including World Commerce and Contracting, the Procurement Supply Association and EPSA, to grow our industry insights, best practice and knowledge sharing as well as training. Developed our standardised and clear remediation plan that takes into account various scenarios to understand and assess, on a case-by-case basis, our ability to influence the supplier, the issues identified and the nature of the supplier. 	<ul style="list-style-type: none"> Worked with the EPSA consortium to enhance the Informed 365 digital platform and continued to capture supplier information and potential modern slavery risks. Continued to monitor digital channels for sanctions and reported incidents. Commenced development of a new Group Procurement and Contract Management Procedure that includes modern slavery risk and mitigation requirements. 	<ul style="list-style-type: none"> Delivered system enhancement to our supplier onboarding platform to include modern slavery declaration. Updated market request for information through our eProcure tender platform to relevant modern slavery information and requests. Updated the Group's modern slavery response register to respond to modern slavery assessments when engaged by the market. Continued to leverage the EPSA heatmap that outlines high risk and high influence industry supply chains. 	<ul style="list-style-type: none"> Updated supplier contracts and purchase order terms and conditions to enhance our modern slavery requirements and obligations. Monitored and delivered our vendor rationalisation program in order to reduce the number of suppliers we engage an to better understand our supply chain and mitigate modern slavery risks. Enhanced our systems to easily identify suppliers that have completed modern slavery questionnaire. 	<ul style="list-style-type: none"> Continued to conduct modern slavery awareness and training session to all people leaders across our Group in addition to targeted training to relevant employees. Connected our modern slavery program and our Group Environmental, Social and Governance (ESG) Plan. Developed and submitted the Group's modern slavery statement.

ASSESSMENT OF EFFECTIVENESS OF OUR ACTIONS

ACTION	DESCRIPTION
Modern Slavery Working Group	Regular meetings of our Modern Slavery Working Group to monitor progress against our action plan whilst assessing any perceived or real risks identified.
Collaboration with industry peers	<p>Collaboration with our industry peers to assess the effectiveness of our actions through discussion, knowledge sharing, and comparison with other practices within the energy industry.</p> <p>Engaging with external bodies such as World Commerce & Contracting, Energy Procurement Supply Association and Procurement and Supply Australasia for training, knowledge sharing and Industry insights.</p>
Internal reporting	<p>Reporting of our progress against our action plan to our Group's leadership team.</p> <p>Capturing supplier Modern Slavery information via the Informed 365 platform and set indicators against supplier records to ensure updated data capture.</p> <p>Reporting against supply chain and operational risks through our formal risk management process ensuring formal assessment of mitigation strategies where and when risks are identified.</p>
Collaboration with our suppliers	Collaborate with key suppliers to enable our understanding of supply chains risk continues to mature.
Assessment of our program of work	Continuous review of our program to ensure we identify key growth areas to factor into our progress.
External reporting channels	Monitoring for sanctions and other reported issues via various digital channels to see if our process is missing any significant risks and applying our learnings. Also, our group is exploring new digital technologies that have emerged to support our supply chain review.

CASE STUDY



PARTNERING TO PROVIDE WORK OPPORTUNITIES FOR AT-RISK COMMUNITIES

Groups at risk of modern slavery and associated labour hire practices include refugees, people who are seeking asylum and recent migrants. As part of our Group's broader commitment to diversity and inclusion, in 2022 we partnered with non-profit social enterprise Career Seekers, who aim to provide students from refugee backgrounds the opportunity to complete paid, professional cadetships and internships to accelerate their journey towards employment.

This gives students the chance to experience first-hand working in an Australian business. It also provides an opportunity to develop a network in their field, find mentors and secure professional referees – very important for securing employment once they graduate.

The first Career Seeker cadet supported by our Group was Monash University banking and finance student, Khatimah Jafari, who was born in Afghanistan.

Khatimah completed her cadetship in her university holidays. It provided her practical work experience in her field of study, industry exposure and networking opportunities all of which were extremely valuable as she continues to navigate a pathway to successfully completing her degree and securing permanent employment.

OTHER INFORMATION

CONSULTATION ACROSS OUR GROUP

Senior leadership across our Group continues to be engaged and consulted in the ongoing management of our modern slavery approach.

To ensure our people are familiar with our approach to addressing modern slavery risks we continue to:

1. Conduct awareness and training session for all people leaders across our group to increase awareness of modern slavery risks and enable the identification operational and supply chain risks.
2. Strengthen our governance and policy framework, with a refresh of our Code of Conduct to ensure modern slavery related obligations are effectively managed as part of our mitigation approach.
3. Enhance various systems used to capture supplier and modern slavery information whilst also reviewing our processes across our Group to support the identification, mitigation and reporting of modern slavery risks.
4. Deliver targeted team training across to raise awareness of this important issue.

GLOBAL CONTEXT AND IMPACTS

The flow-on effects from the COVID-19 Pandemic continued to be felt across global supply chains, with conflict in Ukraine leading to further disruptions. Like many organisations, we observed logistics provider capacity issues, inflation, shipping delays and increased freight costs.

As a Group, our focus was to continue to engage with our suppliers in order to better understand the impact of these global events on our supply chain risks. We have now had more than 428 suppliers complete our modern slavery questionnaire providing us with additional insights and knowledge about supply chain risks.



NEXT STEPS

Throughout 2022, we have continued to deliver a series of governance, training and mitigation activities as part of our modern slavery program. This in mind, we are well aware of the work ahead to reduce the risk of modern slavery across our supply chains and operations.

Looking ahead to the remainder of 2023, we seek to further enhance our modern slavery program, refine our practices and continue to raise awareness of modern slavery risks within our organisation and across the energy industry.

In 2023, our focus is on the following activities and remains in line with the six key phases of our action plan:



Commit

- Develop and launch digitised Code of Conduct training through our HR system.
- Launch a Code of Conduct Toolbox Talk user guide primarily for our operational teams.



Address

- Develop and launch our modern slavery eLearning training module designed to raise awareness across the group.
- Review our supplier onboarding practises and explore technologies that can further support this activity. This includes existing supplier induction processes.



Assess

- Engage and learn from modern slavery experts both in Australia and internationally.
- Continue to engage with our suppliers to provide support and guidance regarding modern slavery risks.



Track

- Review our modern slavery program to ensure the mitigation of risks, connection to our Group Environmental, Social and Governance (ESG) Plan and corporate strategy.
- Deliver our vendor rationalisation program in order to reduce the number of suppliers we engage to better understand our supply chain and mitigate modern slavery risks.



Adapt

- Ongoing monitoring and assessment of supplier base including supply channels to identify suppliers at risk or who have been sanctioned.
- Continue to engage our peers, suppliers and industry and implement learnings into our plans.



Communicate

- Launch our new Group Procurement and Contract Management Procedure that includes modern slavery risk and mitigation requirements.
- Enhancement of our internal audit regime across operations.

