

# Modern Slavery Statement 2023



united energy

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with safety



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## Foreword

United Energy depends on our team of 293 employees and 375 suppliers to deliver reliable, affordable, safe, and flexible electricity to customers.

Managing risk is integral to what we do. The safety of our people and the community we serve underpin our policies, systems and processes. We understand our responsibility extends beyond our business, to the third parties supplying us goods and services so we can deliver our services.

Our operations vary from maintaining poles and wires, inspecting and cutting vegetation, building large-scale solar farms or supporting customers connect clean energy technology. We rely on at least 375 active suppliers to deliver the products and materials we need to deliver our services.

We work hard to choose the right suppliers and consider a range of non-price factors including safety performance, labour practices and values alignment and supporting the communities in which we operate. We will not tolerate any form of modern slavery in our business, or knowingly conduct business with anyone who does. This is backed up by our culture, policies and procedures that support these behaviors.

We continue to take actions to evaluate our supply chains, including risk assessments of our supply categories and suppliers and updating policies to consider modern slavery risks. In 2023, we provided training for relevant employees about modern slavery; it's meaning, how to identify examples and what processes are in place to report any instances that may arise. We have also commenced to dig deeper into our supply chains through extended due diligence reviews to ensure not only our suppliers, but also their suppliers are meeting societies expectations, when it comes to modern slavery commitments.

We continue to be proud of our work to encourage our employees to speak up if they uncover activities or behaviour's that don't meet societies expectations. Everyone should feel safe to report inappropriate or illegal behaviour, including possible modern slavery examples, and our Whistleblower Program continues to provide an anonymous channel for all employees, contractors and suppliers to do so.

Following our roadmap, we continue to work with our peers to further minimise modern slavery risks, improve training, and conduct annual risk assessments of our operations and supply chains. This ongoing and continued improvement will be a key focus of addressing potential modern slavery issues and we look forward to reporting on our progress.

Peter Lowe  
Chairman

Tim Rourke  
Chief Executive Officer



# 1. About us

## 1.1. Who we are

United Energy Distribution Holdings Pty Ltd is the holding company for the United Energy group (United Energy, or UE), which owns and operates the United Energy electricity distribution network.

A CK Infrastructure-led consortium owns 66 per cent of United Energy with the balance owned by SGSP (Australia) Assets Pty Ltd, also known as Jemena.

## 1.2. Our business

We distribute electricity to more than 715,000 customers across east and southeast Melbourne and the Mornington Peninsula. Ninety per cent of our customers are residential. Our network is made up of more than 13,400 kilometres of wires, almost 204,000 poles and associated infrastructure. Electricity is received via 78 sub transmission lines at 47 zone stations, where it is transformed from sub transmission voltages to distribution voltages.

Our purpose as a Distribution System Operator is to ensure all forms of distributed energy resources – such as solar, batteries, smart appliances and electric vehicles – are integrated efficiently and flexibly in a system that benefits customers.



### Fast facts

715,652 customer connections

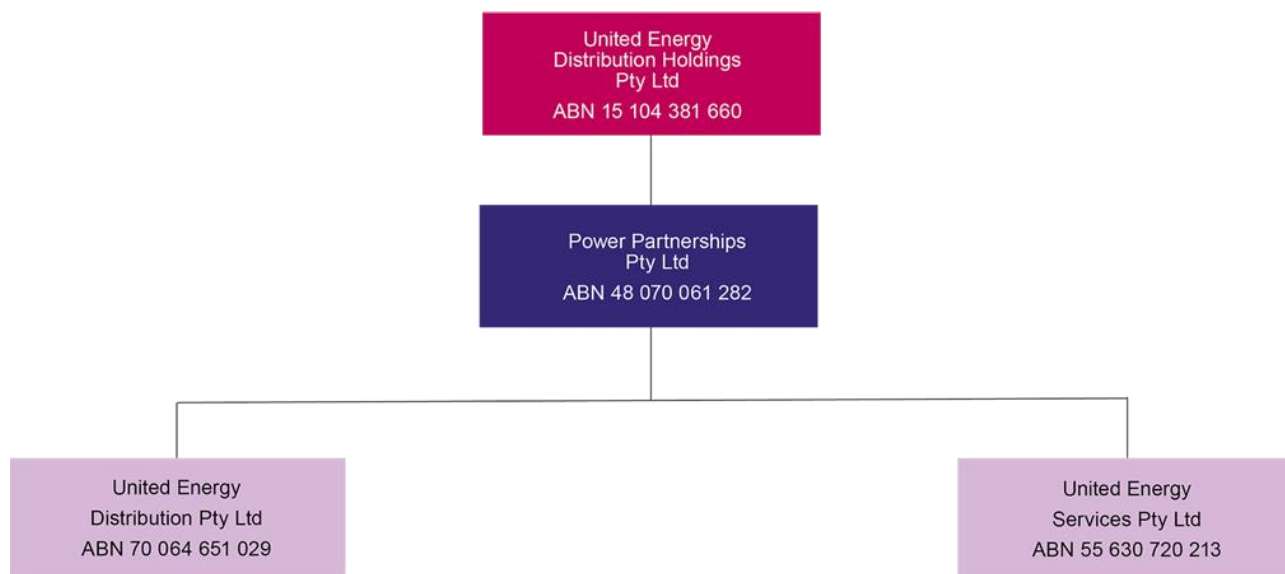
13,495km Network length  
(Powerlines)

Over 200,000 poles and associated  
infrastructure



### 1.3. Corporate structure and reporting entities

This modern slavery statement has been prepared and published in accordance with the *Modern Slavery Act 2018* (Cth) for the calendar year ended 31 December 2023. It is a joint statement made on behalf of, and approved by the Boards of the following reporting entities:



This statement covers the activities of these entities and all entities owned or controlled by them that are not themselves reporting entities that are headquartered in Melbourne.

All references to our, we and us within this statement refer to United Energy Distribution Holdings Pty Ltd and the entities it owns and controls.

### 1.4. Board and management structure

Our Board of Directors oversees our strategic direction and performance and provides support to our Executive Management Team. The Board consists of five directors: two independent directors including the Chair, two shareholder appointed directors and the Chief Executive Officer. The following committees have also been established to assist with the responsibilities of the Board:

- **Audit and Risk Committee** – assists with financial reporting, maintaining an efficient system of internal control and promoting an ethical culture. Is also responsible for reviewing the risk profile of the business and oversight of risk management process, while ensuring appropriate procedures are in place to comply with legal obligations.
- **Environmental Social and Governance** - assists the Board with oversight of Environmental, Social and Governance (ESG) and sustainability matters involving the United Energy group.
- **Remuneration Committee** – reviews and makes recommendations on remuneration arrangements for our people.



United Energy is managed by an executive management team, which is led by the Chief Executive Officer and consists of general managers and chief officers from each of our business units:

**Electricity Networks:** Our Electricity Networks business unit manages our network assets, including our control room. They also are accountable for planning and design of upgrades and augmentations to the electricity network.

**Service Delivery:** Service Delivery is responsible for project delivery and project management, management of UE's external field workforce, and delivery of the works program.

**Finance:** The Finance business unit is responsible for the financial management of United Energy covering financial control, regulatory reporting, strategic financial planning, treasury, and taxation. Finance also covers operational functions spanning revenue management, procurement, commercial property and facilities management, payroll, corporate risk and insurance.

**Corporate Services:** The Corporate Services business unit covers operational functions such as revenue management, procurement, commercial property and facilities management and payroll

**People, Culture and Legal:** Our People, Culture and Legal business unit provides advice and services to support the achievement of our strategic objectives and living our values, including health, safety and environment; HR Operations and Recruitment; Legal; and Organisational Development.

**Corporate Affairs, Customer and Strategy:** Our Corporate Affairs, Customer and Strategy business unit is responsible for driving customer service improvement across the whole organisation and is the primary point of contact for our customers and electricity retailers. It is also responsible for delivering strategic initiatives (including Beon Aerial Services), managing business improvements and process documentation, maintaining ISO certification, providing change management and internal audit services.

**Information Technology:** Our IT business unit is responsible for the strategy, planning and delivery of information technology.

**Regulation:** Our Regulation business unit has two areas of responsibility: Regulation (which includes the regulatory reset and compliance), and Regulatory Strategy and Pricing.



## 1.5. People

As of April 2024, United Energy employed 293 people. We also use shared services from the Victorian Power Networks group and engage supplementary labour from contracted labour hire agencies on an as needs basis.

The number of employees working in each business unit is as follows:

Organisational Unit	Total Headcount excl Supplementary Labour
Information Technology	37
Service Delivery	108
People, Culture and Legal	12
Corporate Affairs, Customer and Strategy	23
Finance	13
Regulation	3
Corporate Services	28
Electricity Networks	69

## 1.6. Supply chains

We do not manufacture the products we use in our businesses. We buy them from suppliers, many which purchase components from their own suppliers. We also buy services.

As of December 2023, we have approximately 375 active suppliers, with 96% (based on their direct engagement business locations) based in Australia. The majority are in Victoria. The small number based overseas are located in Hong Kong, China, USA, New Zealand, Asia (excluding China and Hong Kong) and Europe.

The products we buy range from energy infrastructure materials (power cables, transformers, line hardware, poles, protective equipment, public lighting materials, inverters, PV mounting equipment) to IT hardware, fleet and network associated consumables. Significant services include asset inspection, construction and maintenance, facilities management, traffic management, and IT and professional services.

We have measures in place to identify and reduce the risk of modern slavery in our supply chains. Our Supplier Code of Conduct is available via our website and 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 our position regarding the intent to comply with the Act and also detail the expectations of our 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 our Supplier Code of Conduct including Modern Slavery requirements

In addition to the above, when choosing the right suppliers, we take into account a range of non-price factors including safety performance, labour practices and values alignment, and supporting the communities in which we operate.





## 1.7. Our Progress since our last statement

This is our fourth modern slavery statement. We have continued to put a high focus on improving our knowledge of modern slavery and the associated risks within our supply chains.

We continue to abide by our **Sustainable Procurement Statement**, developed to ensure our suppliers are aware of our 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.

In 2023, we conducted our third supplier survey to understand how our suppliers are performing in relation to modern slavery obligations and the challenges they face. The survey response results have continued to improve since our first survey was released in 2021. We expect this is due to our suppliers' increased awareness of their modern slavery obligations. We have also seen an increase in the number of suppliers who have developed relevant internal processes and procedures to minimise and mitigate modern slavery risks in their own businesses.

We have also continued our ongoing collaboration with our 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. In addition, we have completed a review and subsequently reinforced our tendering schedules relating to Modern Slavery, to ensure tenderers provide sufficient information in their responses to allow us to make informed decisions regarding their internal processes. In 2023, we developed and conducted a modern slavery training program for relevant team members to raise the awareness of the risk of modern slavery across the relevant parts of the business. This program provided an opportunity for people to understand the process with regards to reporting suspected risks to the procurement of goods and services within the business. This program will be available for new team members joining the organisation as well as refresher training over the coming years for those who have already completed the training program.

Each year we also review and analyse our supply chain by category and the inherent risks to formulate a plan to control and/or mitigate the risks as best we can. All contracts also continue to contain anti-slavery and human trafficking requirements. Under these contracts, suppliers must include in its contracts with direct subcontractors and suppliers, anti-slavery and human trafficking provisions that are at least equivalent to the head contract.



## 2. Modern slavery risks in our operations and supply chain

United Energy recognises that the greatest modern slavery risk exists from our external supply chains.

Again in 2023, we conducted a modern slavery risk-mapping assessment. The analysis was undertaken on our operational and supply chain procurement activities focusing on supplier expenditure by sector, risk and geography.

### 2.1. Industry risk

Based on supplier industry and expenditure, our top three key risk sectors continue to be classified as construction, electrical equipment, and employment services – each of which has a unique risk profile.

**Construction and Engineering:** The construction sector, which includes civil engineering companies and large-scale contractors, is characterised by large and complex international supply chains as well as local and overseas manual labour. This sector sources goods and materials which originates in countries or geographic regions with the potential of weaker working conditions and regulations.

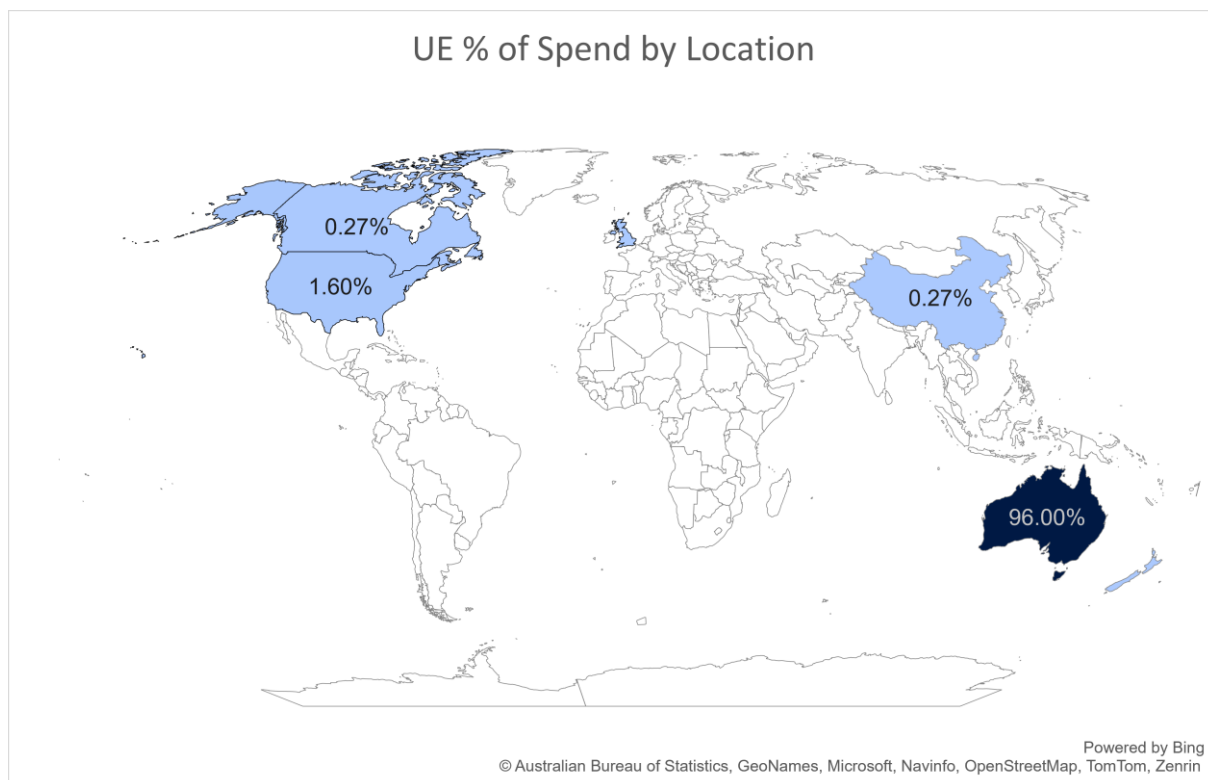
**Electrical Components and Equipment:** This industry includes companies that supply electric cables and wires, electrical components, or equipment not classified in the Heavy Electrical Equipment sub-industry. Similar to construction, the electronics industry typically has long international supply chains for its raw materials manufacture and product assembly.

**Human Resource and Employment Services:** United Energy 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. Suppliers in this industry provide business support services relating to human capital management, including employment agencies, training, payroll and benefit support services, retirement support services and temporary labour hire agencies.

### 2.2. Geographic risk

As 96% of United Energy's suppliers are based in Australia, a nation with democratic governance, strong rule of law, minimal internal conflict and healthy economic development, the geographic modern slavery risks are low.

Country	% of Spend
Australia	96.00%
USA	1.6%
Europe	1.33%
China/Hong Kong	0.27%
Canada	0.27%
New Zealand	0.27%
Asia (excluding China/Hong Kong)	0.27%
Other	0.26%



## 3. Our approach to assessing and addressing modern slavery

### 3.1. Overview

United Energy has undertaken various steps to understand and address the risk of modern slavery within our supply chain. We continue to focus our efforts on programs which will provide a foundation for further initiatives and deliver longer-term outcomes. These include:

- **Policy** – Continued review of existing policies and procedures, including our Procurement and Purchasing Policy, to ensure the most up to date requirements associated with Modern Slavery laws are included for the consideration of modern slavery risks, particularly when tendering and selecting suppliers. We have also included principles of sustainable sourcing and procurement.
- **Contract terms** - In October 2019, we amended all procurement contracts and standard purchase order terms to include anti-slavery and human trafficking clauses and have included those terms in all standard form contracts entered in 2022. These clauses require our suppliers to tell us as soon as they become aware of any actual or suspected slavery or human trafficking in their supply chain, and to require the same of their suppliers. In addition, any contracts entered before this date are reviewed at the time of contract variance, to ensure that anti-slavery and human trafficking clauses are added into the contract variation. This process has continued throughout 2023.



- **Supplier risk assessment** – During 2023 we conducted detailed risk assessments with a particular focus on geographic location, industry sectors and the products and services supplied to us (refer section 2 for the details).
- **Supplier modern slavery self-assessment** – Following our second modern slavery supplier survey in 2022 we undertook our third supplier survey to assess each supplier’s understanding and compliance with modern slavery requirements. The survey results demonstrated a strong compliance with modern slavery legislation and continued improvement in understanding and awareness of our suppliers’ requirements on themselves and their supply chains. The latest results show that suppliers continue to increase their visibility of the risks in their supply chains and implement measures to further improve their behaviours and processes. We have increased the supplier target audience, by including high and medium risk suppliers which represent over 85% of our supply chain spend.
- **Training** - Delivered modern slavery training to our procurement team and other relevant team members to raise awareness and knowledge of modern slavery risks, our responsibility to mitigate those risks and report on our progress as well as how to address these concerns if identified. In excess of 60 staff members have now completed this training.
- **Encouraging reporting** - We are committed to creating and maintaining an open and honest working environment where people employed by us or our suppliers, and their families, can raise concerns about suspected law breaches, our policies and procedures, including our Code of Conduct. This includes raising concerns about modern slavery. We encourage reporting of wrongdoing by providing a convenient, safe and independent reporting mechanism, and protection for people who make a disclosure.

UE continues to work on a new 'source to contract' solution to ensure it meets our requirements in driving greater supplier compliance and improving our ability to review and manage supplier performance. The solution, called Felix, will also assist with regards to our tendering processes and supplier pre-qualification. The system is on track to being implemented within the VPN business by the end of 2024.



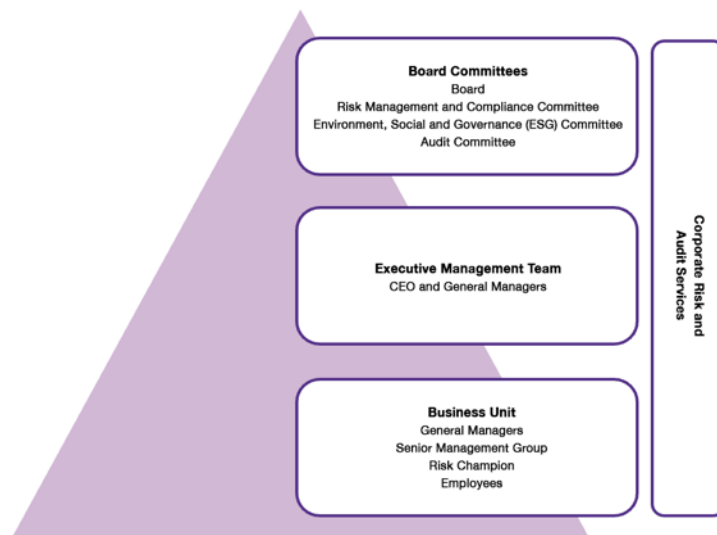
### 3.2. Corporate Governance

United Energy’s **Board** is responsible for the corporate governance and strategic direction of the United Energy group. Its responsibilities specific to the management of modern slavery include:

- Compliance with the Code of Conduct;
- Ensuring that significant risks facing the Group have been identified and that appropriate and adequate control, monitoring, accountability, and reporting mechanisms are in place.

United Energy has established a number of **Committees** to assist the Board in the execution of its duties. The Audit and Risk Committee oversees and makes recommendations to the Board on United Energy’s risk profile and ensures appropriate policies and procedures are adopted. The Committee also assists the Board with its responsibilities to oversee compliance statute and regulations.

The Audit and Risk Committee has specific direction from the Board to consider modern slavery risks as they apply to our business and supply networks.



### 3.3. Risk management

Risk management is an integral part of our business. It is reflected in policies, systems and processes, including in our strategic planning process, performance management and overall governance.

The business uses an “Enterprise Risk Management” approach to provide a comprehensive and consistent process to manage and report on business risk exposures through identification of strategic, operational and emerging risk, determining accountability for those risks, assessment of controls and the control environment and ensuring that there are adequate resources to manage the risks.

The business has a formal Enterprise Risk Management Framework 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. Regular reporting to the Board via the Risk Management and Compliance Committee is also a key component of the framework.

The Executive Management Team (EMT) has executive oversight of risk management throughout the business. The Corporate Risk Team present to the EMT members on a regular basis on the results of the risk profiling.

The risk of modern slavery was formally incorporated into our Enterprise Risk Framework in 2021.

### 3.4. Operational due diligence

We continue to take a proactive approach to modern slavery due diligence internally by creating a positive culture where our people are comfortable speaking up and are aware of their rights. Our policies and procedures (listed below) provide guidance and clear information to our employees about their rights and responsibilities.



Leaders across our business are encouraged to be aware of, and be vigilant around, instances of modern slavery within our workforce. This includes both employees and contractors. We support and comply with Australia's strong workers' health and safety legislation, which acts as a mitigating factor to modern slavery risks within our workforce.

### 3.5. Policies and procedures

In addition to our governance structure set out above, we maintain and implement a range of policies and procedures to mitigate modern slavery risks in our operations and supply chains. These include our:

**Health and Safety Policy** - the health and safety of our employees, contractors, customers and the community is our highest priority. Supporting and complying with Australia's strong workers' health and safety legislation also acts as a mitigating factor to modern slavery risks within our workforce and supply chain.

**Procurement and Purchasing Policy** - provides direction on ensuring the procuring and purchasing of goods and services meet regulatory, business and governance requirements.

**Supplier Code of Conduct** – outlines ethical standards in behaviours that suppliers, as partners, will aim to meet when conducting business with United Energy.

**Whistleblower Policy** - aims to encourage reporting of wrongdoing that is of a legitimate concern by providing a convenient and safe reporting mechanism and protection for people who make a disclosure. This policy is for use by our employees or contractors and their families, our suppliers and their families.

**Employee Handbook Code of Conduct** - provides guidance to our employees on our company values, code of conduct, relationships with suppliers, and reporting a concern.

**Enterprise Risk Management Policy and framework** - enables key stakeholders to understand and respond to the risks that may affect business objectives, effectiveness and efficiency.

**Supplier compliance** - administered through the insertion of an anti-modern slavery clause in our contracts and purchase order standard terms.

### 3.6. Training

The United Energy procurement team and other relevant team members throughout the business have undertaken Modern Slavery Act training to reinforce the key objectives of the modern slavery risk management framework. The training was conducted in November 2023 and included the broader human rights agenda, taking into account key human rights issues within the energy services sector and an overview of United Energy's process and documents. In excess of 60 employees have successfully completed this training. This training will continue to be updated to reflect ongoing amendments to the Act. It will also be available on an annual basis for any new starters within the Procurement Team and other related teams throughout the business. It will also be available as refresher training for any team members wishing to receive a refresh of the information provided.

Our objective with regards to this training, now and into the future, is to encourage sustainable procurement of network materials that are fit -for-purpose and have a low environmental impact when manufactured and in use in our networks.



## 4. Measuring our effectiveness

We continue to be committed to measuring the effectiveness of our modern slavery risk management.

Throughout 2023, we continued to focus our attention on risk identification and management processes, continuing to build employee awareness and knowledge through training. We also continued to review and revise our relevant policies and procedures to ensure they support our management of modern slavery risks and are inline with the requirements of the Modern Slavery Act

Throughout 2023, we again had no confirmed cases of modern slavery instances raised for remediation in our supply chain. In the event we identify an instance of modern slavery within a specific supplier's operations or supply chain, we will work with that supplier to remediate the issues and risks identified in our assessment. When we can't achieve a satisfactory resolution, we will implement other measures, including terminating our relationship with the supplier.

Our Whistleblower Program provides an effective mechanism for reporting and escalating any issues of concern to employees of us or our suppliers, or their families, and we are committed to maintaining an environment where legitimate concerns can be reported without fear of retaliatory action or retribution, and anonymously if required.

## 5. Stakeholder engagement and consultation

The content of this statement applies to all entities owned and controlled by United Energy. Internal and external subject matter experts across all business units were involved in preparing and reviewing this statement. As the directors of each reporting entity are the same, and the group is managed by a single executive management team, uses the same policies and processes and shares the same suppliers, we have provided a single consolidated description of our actions to address modern slavery risks and this statement has been prepared on a 'whole of group' basis.

The working group that co-ordinated preparation of this statement included representatives from our procurement, sustainability, corporate affairs and legal teams and received input from our business, our risk team and our executive management team.

Consultation was undertaken at Board level through presentations to and feedback from the Environmental, Social and Governance (ESG) Committee and consideration and approval of this statement by the UE Board.

This statement was approved by the Board of each reporting entity on 4 June 2024.



## 6. Additional information

In 2021 and 2022 we had a significant task of increasing our knowledge of modern slavery and improving our visibility of supply chain risks. In 2023, we undertook and implemented the following activities:

1. Deployed training with the relevant groups across the company resulting in a raised awareness regarding modern slavery and what to do and how to identify a modern slavery event. In excess of 60 staff members have completed this training.
2. Conducted our third modern slavery supplier survey across suppliers in our higher risk areas; and
3. Re-evaluated our risk assessments for all categories of supply.

In 2024, we have plans to:

1. Continue to work on a new 'source to contract' solution to ensure it meets UE's requirements in driving greater supplier compliance and improving our ability to review and manage supplier performance. The solution called Felix will also assist with regards to our tendering processes and vendor supplier pre-qualification. The system is on track to being implemented within the UE business by the end of 2024.
2. Continue relevant team engagement and upskilling about modern slavery in our 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 our risk assessments for all categories of supply.
5. Complete a comprehensive Modern Slavery Audit on 5-7 of our Strategic suppliers' base – approx..10%.
6. Survey our suppliers on what they are doing to support modern slavery in their business and supply chain.

### 6.1. Company information

#### United Energy

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#### Whistle-blower Hotline

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Email: [speak-upanonymous@stoline.com.au](mailto:speak-upanonymous@stoline.com.au)