



Modern Slavery Statement 2025



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Reporting Period: 1 July 2024 to 30 June 2025

Western Power is committed to conducting business ethically and responsibly. We recognise our responsibility to ensure that our business practices contribute to the prevention and elimination of modern slavery. This statement outlines our ongoing efforts to identify, assess, and address modern slavery risks in accordance with the *Modern Slavery Act 2018 (Cth)*.

Electricity Networks Corporation trading as Western Power (Western Power) is a Western Australian statutory corporation established under the *Electricity Corporations Act 2005 (WA)*.

Western Power has a Board entirely comprised of independent directors and is accountable to the Western Australian Minister for Energy. Western Power does not own or control any other entities.

This Statement was approved by Western Power's Board on 14 November 2025 and is signed by the Board Chair, Denise Goldsworthy.



About Western Power

Western Power is a Western Australian State Government owned corporation that builds, maintains and operates the electricity distribution network in the southwest corner of Western Australia (WA). Our network connects 2.3 million customers and spans approximately 255,000 square kilometres – powering the lives of the WA community.

Our vision is to work together to power a cleaner energy future for the customers and communities covered by our network area.

We are committed to delivering safe, reliable, affordable and increasingly renewable electricity supply.

This vision extends to our approach to human rights, including our commitment to preventing modern slavery and reducing harm as we expand our network that plays a vital role in WA achieving its decarbonisation goals.



Actions taken to assess and address modern slavery risks

Western Power's modern slavery program employs a risk-based approach to assess, raise awareness and drive action to prevent and respond to modern slavery. It consists of the following pillars.

Awareness

All suppliers must attest compliance with our **Supplier Code of Conduct** before commencing work and annually thereafter. The Code explicitly addresses our expectations around modern slavery including:

- Prohibition of forced, bonded, or child labour
- Requirements for fair wages and working conditions
- Obligation to identify and address risks and take appropriate measures to remedy.

Our external website identifies modern slavery as a key focus area, providing information on reporting concerns directly to Western Power or through our anonymous whistleblower hotline. Our **Ethical Supply Chain Guide** increases awareness and provides practical steps suppliers should take to meet our expectations and operate in a manner consistent with the United Nations' Guiding Principles on Business and Human Rights.

All Western Power staff who are involved in procurement decision making are required to complete mandatory training addressing modern slavery considerations in purchasing activities. Our Modern Slavery Procedure detailing minimum tendering requirements provides guidance to our teams.

Due diligence

Our Risk-Based Procurement Tool provides a practical method for our procurement teams to evaluate supplier and industry risks through four key criteria addressing:

- Vulnerable populations
- High-risk business models
- High-risk sectors
- High-risk geographies.

The risk ratings determine the appropriate due diligence levels in the form of evaluation criteria and contract management practices, requiring suppliers to demonstrate their commitment to ethical labour practices.

High risk suppliers are then subjected to enhanced measures including desktop or physical audits, enhanced contract management protocols and ongoing monitoring throughout the contract lifecycle.

The risk screening approach also determines the appropriate level of modern slavery provisions each supplier contract must contain. These include but are not limited to:

- obligations to take reasonable steps to ensure personnel and supply chain participants comply with human rights law
- requirements for adequate and reasonable policies, controls and procedures to prevent, detect, and remedy modern slavery
- mandated inclusion of equivalent provisions in subcontractor arrangements
- an obligation to notify us as soon as practicable after becoming aware of any actual or suspected activity which does not align with these provisions.

Developed collaboratively with other Western Australian energy and resource companies, our Self-Assessment Questionnaire (SAQ) raises supplier awareness while providing insights into their supply chains and risk mitigation activities. The SAQ is integrated into our contract lifecycle management system and can be used during procurement events and ongoing supplier relationship management.

Remedy

Our Response Action Plan follows SAQ assessments, providing recommended actions based on supplier risk profiles. The plan is used where suppliers are not meeting our minimum requirements and provides resources for communicating expectations and supporting supplier remediation efforts.

Should actual modern slavery instances be identified, we will implement **Walk Free's Response and Remedy Framework**, which Western Power was privileged to help develop. This framework provides guidance for responding to modern slavery incidents and cooperating in worker remediation.

Industry collaboration

We actively participate in the Human Rights Resource and Energy Collaborative initiative, a consortium of resource and energy companies sharing knowledge, insights and best practices.

Through this group we had the privilege of meeting the newly appointed Anti-Slavery Commissioner, Chris Evans for a valuable conversation around how the group can work with the Commissioner's office to further expand awareness and collaboration across industry.

We also engaged with other Government Trading Enterprise utilities in a peer learning session to share approaches and strengthen collective capability in training around modern slavery. Participation in these groups represents our commitment to remaining open to learning and continuously improving how we address modern slavery.



Modern slavery risks facing Western Power

Western Power has not been made aware of any actual or suspected modern slavery incidents during the reporting period through our whistleblower processes, supplier interactions, or other reporting mechanisms. We recognise that the potential for modern slavery exists within our operations and supply chains, requiring ongoing vigilance and systematic risk management.

Our operations

Our direct operations present a relatively low modern slavery risk. We employ more than 98 per cent of our workforce through direct employment contracts, covering permanent, fixed-term, and casual positions across technical, operational, and professional roles. Our employees work from our Perth offices, metropolitan and regional depots, and operational sites in WA.

We maintain a contingent workforce of approximately two per cent of total staff, sourced through labour hire agreements. These arrangements present a heightened operational risk due to the absence of direct employment contracts between Western Power and these workers.

All workplace agreements comply with Australian workplace laws and regulations and are supported by comprehensive employment policies and procedures. Through induction and mandatory training, we ensure that employees understand our expectations and values and know how to raise concerns through appropriate channels.

Our supply chain

Western Power maintains approximately 1,850 active suppliers and manages 397 contracts through a centralised procurement function. In support of local economic development, 96 per cent of our suppliers are Australian businesses. Australia remains a lower risk jurisdiction. While the risk of modern slavery within our direct supplier network remains relatively low, many suppliers operate complex multi-tier supply chains.

Analysis of financial year 2025 expenditure indicates that approximately 26 per cent of our spend with direct suppliers carries an inherently higher modern slavery risk. Figure 1 provides a breakdown of key high-risk categories that include:

- **Electrical equipment (cables, meters, transformers, switchgear):** High risk due to manufacturing locations and supply chain complexity
- **Information technology services:** Risk associated with global supply chains and manufacturing
- **Photovoltaic panels and batteries:** Emerging technology sectors with complex mineral supply chains.

Figure 2 provides an overview of our analysis of material sourcing locations, with the percentage spent referenced against Walk Free’s Global Slavery Index, which indicates exposure to countries with elevated modern slavery prevalence. Materials represents approximately 20% of Western Power’s total spend.

Figure 1 – Key high-risk spend categories

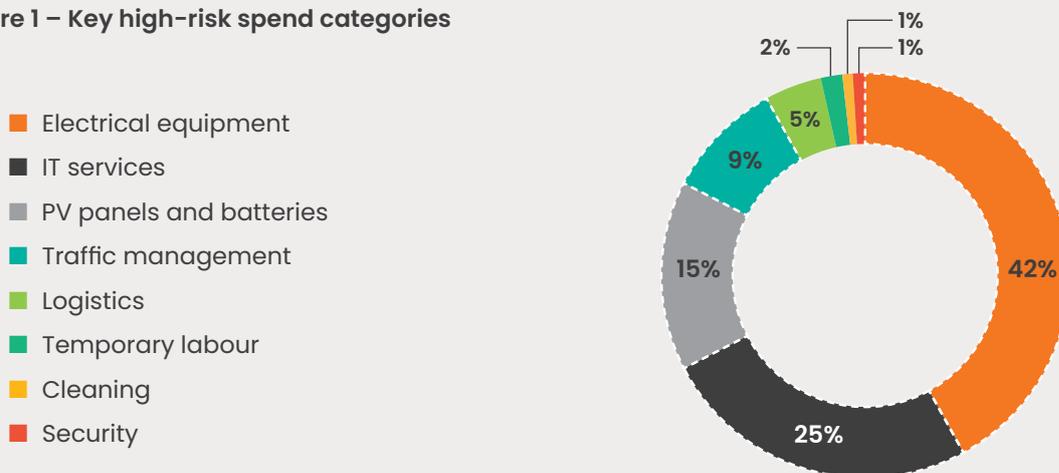
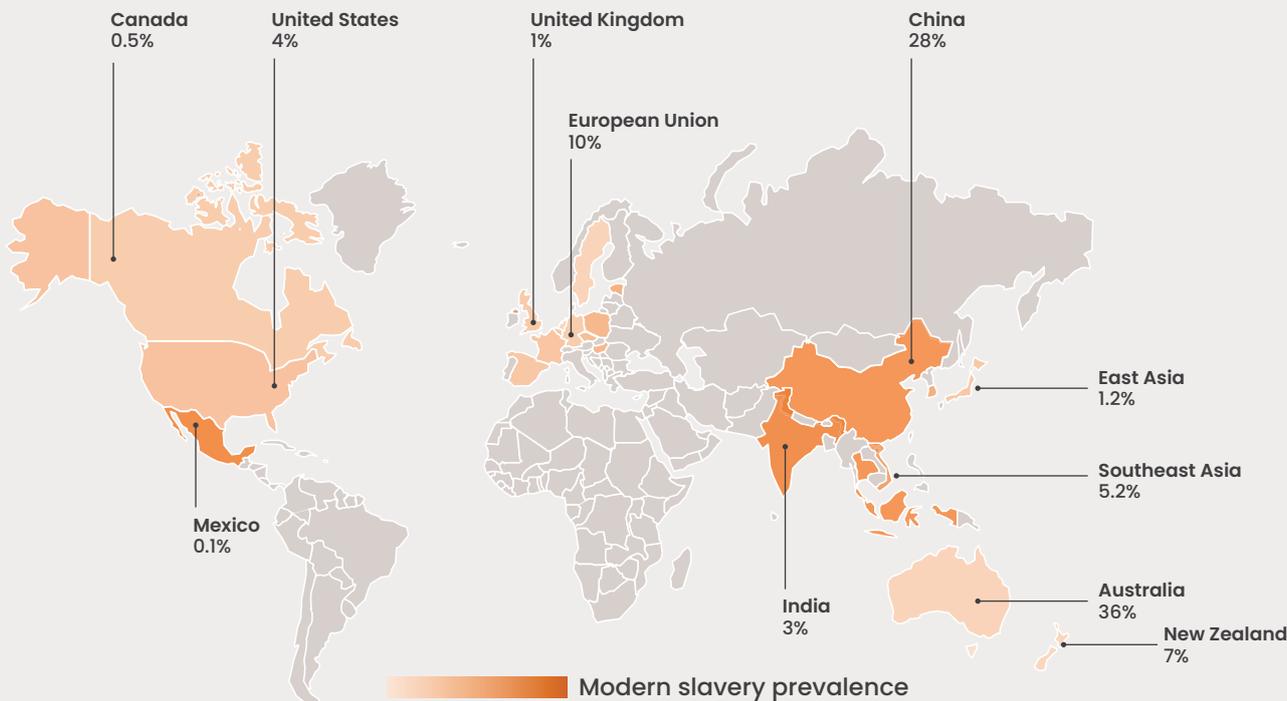


Figure 2 – 2025 materials spend by country



*Includes tier-n suppliers in Western Power’s materials supply chain.

Effectiveness

This statement concludes the three-year modern slavery roadmap that Western Power put into place to guide our strategic initiatives from 2023–2025. We have achieved significant progress in developing our modern slavery response capability, and acknowledge that we still have areas of improvement that we are committed to achieve.

Key achievements over the roadmap period:

- All active suppliers have attested compliance with our Supplier Code of Conduct
- 94% of supply chain expenditure assessed and categorised for modern slavery risk
- 96% local supplier base reducing geographic risk exposure
- Implemented and improved our supplier due diligence approach
- Zero confirmed modern slavery incidents reported through our systems
- Collaborative tools developed with industry peers and civil society organisations.

Our review of the program at the end of the roadmap period as we move into a monitor and maintain position has established the following ongoing commitments:

- Annual reviews of modern slavery risk assessment processes to ensure effectiveness and fitness-for-purpose
- Continue collaboration with utilities, government agencies and the HRREC group
- A commitment to supporting suppliers in developing their own modern slavery prevention capabilities
- Integration of emerging best practices and regulatory guidance. We will continue to look for opportunities to enhance our modern slavery position across the business.

Consultation and governance

This statement was developed through comprehensive consultation involving:

- Executive leadership team oversight
- Key business unit representative engagement
- Procurement and supply chain team expertise
- Legal guidance
- Board review and approval.

The statement reflects organisation-wide input and our commitment to continuous improvement in modern slavery risk management.



Our ongoing commitment

We recognise that eliminating modern slavery requires sustained effort and collaboration across industries. Western Power is committed to maintaining the highest standards of ethical business conduct.

We remain committed to continuous improvement of due diligence processes and risk management, as well as transparent reporting on progress, our activities and their associated risks. We pledge to actively collaborate in industry and community initiatives to assess, manage, and remedy modern slavery issues, ensuring ongoing improvement in our practices.





For additional information or questions, please lodge your query via our website my.westernpower.com.au/contact-us/

If you'd like to let us know about a suspected wrongdoing, please contact Western Power directly on either 13 10 87 (General) or 1300 304 550 (STOPline).

This information is available in alternative formats if requested.

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