

# Energy Queensland Group Modern Slavery Statement

2022 - 2023



## About this Statement

This Modern Slavery Statement has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

This is the fourth joint Modern Slavery Statement made by Energy Queensland Limited and its wholly owned subsidiaries Energex Limited, Ergon Energy Corporation Limited, Ergon Energy Queensland Pty Ltd and Yurika Pty Ltd (EQL Group).

As the EQL Group use the same policies and processes, operate in the same sector, and share many suppliers, this Statement provides a consolidated description of the actions taken to assess and address the risk of modern slavery in the operations and supply chains of the EQL Group for the financial year ending 30 June 2023.

This, and earlier Modern Slavery Statements, can be found on the Modern Slavery Register at <https://modernslaveryregister.gov.au>

Energy Queensland acknowledges the Traditional Custodians of the land on which we live and work, and recognises their continuing connection to land, waters, and community. We pay respect to Elders past and present.

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## Our structure, operations, and supply chain

### Structure and operations

Energy Queensland is Australia's largest, wholly Queensland government-owned electricity company. We operate predominantly in Queensland as the parent company of the EQL Group. We provide administrative, corporate and management functions to each of the EQL Group entities shown in **Figure 1** and their subsidiaries.



**Figure 1:** EQL Group of companies

Our 'poles and wires' businesses, Ergon Energy Network and Energex, deliver electricity across Queensland. We supply more than five million Queenslanders through more than 210,000 kilometres of electricity networks, and 33 isolated systems.

Our retailer, Ergon Energy Retail, sells this electricity to its 766,000 customers throughout regional Queensland, with generation, energy trading and retailing capabilities. Ergon Energy Retail's customer numbers make it the fourth largest retailer in the National Electricity Market.

Yurika provides integrated solutions in energy and infrastructure, energy supplies, metering, telecommunications, and digital services to

connect its customers to a sustainable energy future. Yurika has two subsidiaries: Yurika Metering, which provides contestable metering services across the National Electricity Market; and Yurika Telecoms, which provides telecommunications services principally in Queensland.

We energise Queensland communities from Tweed River to Torres Strait and from Brisbane across to Birdsville, and through Yurika's services, to a growing national footprint. Our core service area is shown in **Figure 2**.

We have more than 8,600 employees across Queensland, and in the other Australian markets that we're operating in. Approximately half of our employees reside and work in regional areas.

We employ a diverse range of people in operational, technical, and professional roles. The majority are engaged through direct employment on permanent or fixed term contracts.

### Investments

Energy Queensland has a minority shareholding in Redback Technologies Holdings Pty Ltd ACN 634 626 538, a Brisbane based clean-tech company that manufactures smart solar storage and network management solutions.

Energy Queensland also holds a minority investment in Queensland Capacity Network Pty Ltd ACN 633 081 517 (trading as QCN Fibre), a communications company set up for the purpose of enabling faster and more reliable internet services in regional Queensland.

Ergon Energy Retail holds an interest in EnergyOS Pty Ltd ACN 164 557 448, a software company that delivers energy management and portfolio services.

# Energy Queensland: A snapshot

Source: Energy Queensland Annual Report 2022–23



**8,200**  
employees



**210,000km**  
powerlines (overhead and underground)



**5** customer contact centres



**3** network control centres

**500+** graduates and apprentices



**1.7 million**  
power poles



**34** power stations (including network-connected Barcolana)



**43** large-scale solar energy connections



**2.3 million**  
connected customers

**766,000**  
retail customers



**\$29.2 billion**  
asset base



**800,000**  
solar energy systems connected

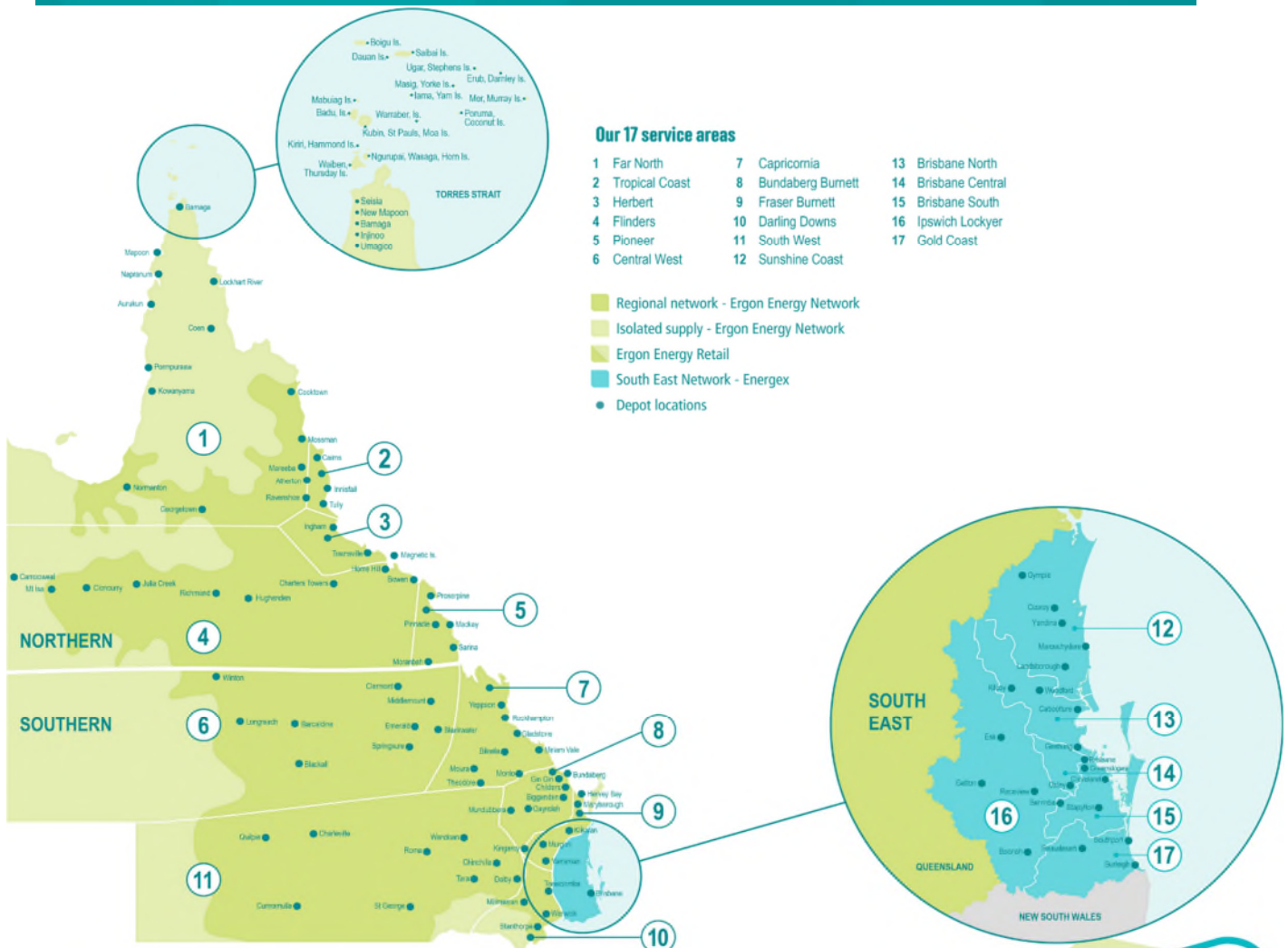


Figure 2: Core service area of the EQL Group

## Supply chain

The EQL Group utilises global and domestic suppliers to procure goods, materials and services for our operations.

Our suppliers are based in Europe, the UK, USA, New Zealand, Canada, China and Southeast Asia, as well as across many States within Australia. In alignment with the Queensland Procurement Policy we encourage procuring from small to medium enterprises within Queensland to support local businesses.

Procurement of any goods, materials or services is governed by robust policies, procedures and processes that apply to all employees and contractors working for or on behalf of the EQL Group.

## Actions taken to assess the risk of modern slavery in our operations and supply chain

### Operational risk assessment

As with previous years, we assessed the risk of modern slavery in our operations by considering:

- Sector and industry risks - Certain sectors and industries may have high modern slavery risks because of their characteristics, products, and processes.
- Product and services risks - Certain products and services may have high modern slavery risks because of the way they are produced, provided, or used.
- Geographic risks - Some countries may have higher risks of modern slavery, due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.
- Entity risks - Some entities may have modern slavery risks because they have poor governance structures, a record of treating

workers poorly or a track record of human rights violations.

We have assessed the risk of modern slavery practices in our operations as low. As detailed in our previous statements, the EQL Group operate in a highly regulated electricity industry. In addition, as a Government Owned Corporation, we are subject to additional regulations, scrutiny, and community expectations.

We are committed to ethical and responsible decision making and have in place an Integrity Framework that supports this via policies and guidelines, as well as internal networks and support.

Our recruitment, resourcing and governance framework continues to mitigate the risk of modern slavery for our employees.

We continue to use labour hire arrangements and have identified that this may give rise to the risk of us causing, contributing, or being directly linked to modern slavery.

The increased focus on renewables as part of the Queensland Energy and Jobs Plan has been identified as an area that may increase the risk of exposure to modern slavery. These risks will be assessed in conjunction with the potential impacts to the supply chains as the program of work is developed.

### Supply chain risk assessment

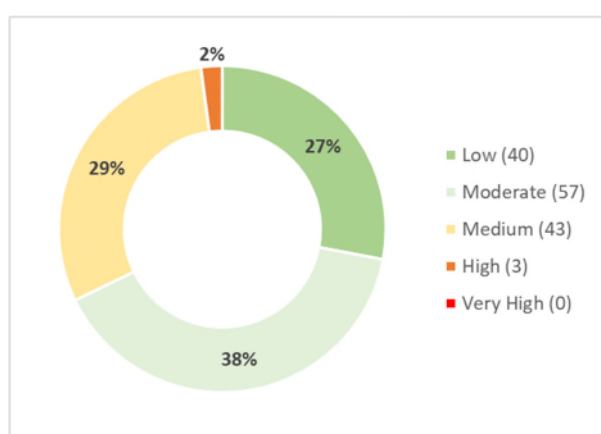
We utilise the Informed 365 platform to assess the risk of modern slavery in our supply chain. Our suppliers are invited to complete the Modern Slavery Self-Assessment Questionnaire on the platform. Once completed, a supplier's response is analysed against pre-determined question weightings to provide an overall modern slavery risk score.

Over the past 12 months, we have broadened the scope to include smaller suppliers based on their geographic location on our supply mapping

register. This has allowed us to invite suppliers from locations that are at a higher risk based on the Global Slavery Index.

To date, 249 suppliers have been invited to complete the modern slavery questionnaire on the platform, an increase of 84 from last year with a 65% participation rate. The risk assessment of the supplier responses received are shown in

**Figure 3.**



**Figure 3:** EQL Group Supplier Risk Profile from Informed 365 as at 02/08/2023 (n=149)

During the reporting period, Informed 365 assessed three of our suppliers as being a high risk. Each of these instances were investigated and it was identified that these are services businesses considered micro in size (0-5 employees). Informed 365 assessed the risk as high due to a lack of formal documentation (such as a whistle blower policy) and specific modern slavery training for their staff. This is not unusual for small owner-operated businesses and given these businesses do not use labour hire or sub-contract to third parties, and we considered the risk to be mitigated.

One of our future actions is to support our small suppliers to ensure that they are aware of and contribute to our efforts to identify modern slavery in the supply chains of all suppliers, regardless of size. The Procurement and Supply group are currently working with Informed 365 to create self-

assessment questionnaires tailored to smaller businesses to bridge this gap.

## Actions taken to address the risks

We mitigate the risks through our procurement and contract management policies, procedures, and processes. For example, the EQL Group:

- only use licensed agencies on either the Queensland Government Contingent Resource Panel or our own panel of vetted contractors and suppliers;
- utilise robust engagement and contract terms;
- conduct regular reviews of labour hire rates and wages to ensure they meet or exceed legislative requirements; and
- use Informed 365 to assess individual suppliers.

Further details in relation to the actions we have taken to mitigate the risk of modern slavery are outlined below.

### Queensland Government's Framework

As a government owned corporation, Energy Queensland is bound by the Queensland Procurement Policy which sets a clear commitment to eliminating modern slavery in government supply chains through its Ethical Supplier Mandate, Ethical Supplier Threshold, and the Supplier Code of Conduct.

When registering to become a supplier to the EQL Group, businesses must complete a supplier registration form where they are required to acknowledge that they will comply with the Queensland Government's Supplier Code of Conduct when supplying us goods or services.

Under the Queensland Government's Supplier Code of Conduct, suppliers are required to act against human rights exploitation in their supply chain and to address modern slavery risks.

### ***Tender questions***

All tenderers for our procurement activities are required to answer modern slavery questions that allow us to assess the risk of modern slavery in their operations and supply chain. Those tendering on goods and materials contracts are required to provide details about their supply chain, including the primary and secondary locations of where they will obtain materials they propose to supply to us. This information is collated into a mapping database to provide an overall view of the supply chain to enable more informed tendering decisions.

### ***Contract clauses***

Our commitment to identifying and remediating modern slavery in our supply chain is reflected through specific clauses in our contracts.

Depending on the nature of the contract and the associated risk profile, suitable template clauses will be included in our contracts. For example, the contract may require the supplier to have adequate and reasonable policies, controls, procedures, and training in place designed to detect, assess, manage, and remedy modern slavery in its operations and supply chains.

The contract may also enable us to request information about a supplier's compliance with the modern slavery contract clauses and to undertake due diligence on their supply chain.

All contract templates, including those for subsidiaries, have been updated to include modern slavery clauses.

### ***Informed 365 assessments***

While we prioritise modern slavery assessments of suppliers with a higher risk of modern slavery (based on industry or geographic location), we have sought to expand our assessment across our entire supply chain, including small and medium sized suppliers during this reporting period.

Responses indicate our suppliers are becoming more aware of modern slavery and they are taking steps to understand how they can improve their own identification and remediation processes.

50% of respondents said they have mapped out at least tier 1 suppliers and 18% indicated that they planned to do so within 12 months. Steps being taken by suppliers to reduce the risk of modern slavery include embedding contractual obligations in supplier agreements, seeking alternative supply sources and audits of their suppliers' approach to addressing modern slavery.

In the next reporting period, we will continue to encourage our suppliers who are yet to complete the survey to do so.

### ***Collaboration and engagement with industry***

Energy Queensland continues to be an active member of the Modern Slavery Community of Practice (CoP). The CoP is comprised of Queensland government owned corporations, statutory bodies, and budget sector agencies.

This ongoing collaboration provides a forum to share knowledge and expertise and identify opportunities to share information and resources (such as training and awareness materials). The CoP is an integral source of information and input into the Queensland Government's Modern Slavery Framework and Roadmap.

As a member of the Energy Procurement Supply Association (EPSA), we meet regularly with Informed 365 to discuss improvements to the functionality of the platform. Improvements were made to the supplier registration process to support the supplier experience. Reporting from the platform has been improved with the addition of custom reporting functionality and the layout of the information has been streamlined to make it easier to view our overall performance.

### ***Training and awareness***

The training materials offered by the Australian Border Force were adapted and implemented



during the reporting period. These general training modules are available to all EQL Group staff to support awareness around identifying, assessing, and managing modern slavery risks.

Tailored training is provided to our procurement team, given the nature of their role requires a greater understanding of modern slavery practices and risk indicators.

During the reporting period, periodic internal communication channels were utilised to promote awareness of Modern Slavery and support our people to identify signs of modern slavery and know how to respond.

***Integrity Line and modern slavery investigation process***

Our externally administered Integrity Line enables our people and third parties to report, in addition to any whistle-blower issues, any concerns that

the EQL Group may be involved in modern slavery practices. The Integrity Line continues to be promoted through internal communication channels in addition to being publicly available on our websites. No reports related to instances of modern slavery were received via the Integrity Line during the reporting period.

***Benchmarking the maturity of our modern slavery practices***

A benchmarking exercise was undertaken to measure EQL’s current maturity against best practice tools provided by organisations such as Walk Free Foundation. This exercise allowed us to identify a number of activities to incorporate into our action plan for the coming year.

## Assessing the effectiveness of our actions

**Table 1.** EQL’s Assessment of Actions Taken:

Activity	Objective	Measure of Effectiveness
Supplier engagement and assurance	<ul style="list-style-type: none"> <li>• Increase supplier awareness of modern slavery practices</li> <li>• Encourage suppliers to review their operations and supply chain for human rights and modern slavery practices</li> <li>• Assurance over supplier’s self-assessments</li> </ul>	<ul style="list-style-type: none"> <li>• An additional 42 self-assessment questionnaires were completed in this period taking the total number to 149</li> <li>• Process established to prompt suppliers to review their SAQ responses every 2 years</li> <li>• Process established to review supplier’s self-assessments and verify documentation</li> <li>• Process for engaging with and investigating any supplier with a risk rating of medium, high, or very high.</li> </ul>

**Table 1** continued

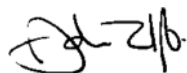
<p>Training and awareness</p>	<p>Promote awareness of modern slavery practices and support our people to identify signs of modern slavery and how to respond</p>	<ul style="list-style-type: none"> <li>• Modern Slavery awareness training made available to all staff on our internal learning platform</li> <li>• Delivery of training to new procurement team members and refresher training (where relevant) completed during reporting period.</li> <li>• Periodic review of training materials and resources</li> <li>• Utilising internal communication channels to raise awareness of modern slavery practices and the resources available (such as training and procurement processes)</li> </ul>
<p>Collaboration</p>	<ul style="list-style-type: none"> <li>• Sharing of knowledge and learnings with energy and other utility organisations</li> <li>• Collaborating on activities to support the eradication of modern slavery</li> </ul>	<ul style="list-style-type: none"> <li>• Engagement levels at monthly EPSA Modern Slavery meetings and Queensland Government Entities' Modern Slavery Community of Practice</li> <li>• Improvements made to the EPSA Modern Slavery Risk platform on Informed 365 including improved reporting visualisation, and Geographic/Industry risk ratings</li> </ul>
<p>Procurement and purchasing processes</p>	<ul style="list-style-type: none"> <li>• Support the identification, assessment, and actions to address modern slavery risks</li> </ul>	<ul style="list-style-type: none"> <li>• Suppliers registering with Informed 365 and completing the modern slavery self-assessment questionnaire</li> <li>• Modern slavery risks are considered, identified and risks mitigated through the procurement process</li> <li>• Assess supplier's completion of self-assessment questionnaire when renewing contracts</li> </ul>
<p>Reporting of instances of modern slavery</p>	<ul style="list-style-type: none"> <li>• Provide employees and third parties with a process to report actual or suspected instances of modern slavery practices in our operations or supply chain</li> <li>• Modern Slavery Investigation Process to allow assessment of incidents raised</li> </ul>	<ul style="list-style-type: none"> <li>• Reports relating to modern slavery made to our 24/7 Integrity Line</li> <li>• Employee awareness of reporting process</li> <li>• Periodic review of the Modern Slavery Investigation Process</li> </ul>

## Consultation and Approval

Energy Queensland and its wholly owned subsidiaries Energex Limited, Ergon Energy Corporation Limited, Ergon Energy Queensland Pty Ltd and Yurika Pty Ltd Limited are each reporting entities under the *Modern Slavery Act 2018* (Cth).

To prepare this joint statement, we actively engaged and consulted with each reporting entity in the EQL Group. The Executive Leadership Team that is shared across the EQL Group was involved in the review and the endorsement of this Statement for approval by the Energy Queensland Board of Directors.

This statement was approved pursuant to the *Modern Slavery Act 2018* (Cth) by the Board of Energy Queensland Limited as the parent entity on 22 November 2023.

A handwritten signature in black ink, appearing to read "S. Zeljko".

**Sarah Zeljko**

Chair

## Corporate Directory

### **Energy Queensland Limited**

ABN 96 612 535 583  
420 Flinders Street  
Townsville Queensland 4810

### **Energex Limited**

ABN 40 078 849 055  
26 Reddacliff Street  
Newstead Queensland 4006

### **Ergon Energy Corporation Limited**

Trading as Ergon Energy Network  
ABN 50 087 646 062  
420 Flinders Street  
Townsville Queensland 4810

### **Ergon Energy Queensland Pty Ltd**

Trading as Ergon Energy Retail  
ABN 11 121 177 802  
420 Flinders Street  
Townsville Queensland 4810

### **Yurika Pty Limited**

ABN 19 100 214 131  
26 Reddacliff Street  
Newstead Queensland 4006

### **Metering Dynamics Pty Ltd**

Trading as Yurika Metering  
ABN 58 087 082 764  
26 Reddacliff Street  
Newstead Queensland 4006

### **Ergon Energy Telecommunications Pty Ltd**

Trading as Yurika Telecoms  
ABN 34 106 459 465  
420 Flinders Street  
Townsville Queensland 4810