

Modern Slavery Statement

Statement for 2020



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Reporting entity

This statement has been prepared and published in accordance with the *Modern Slavery Act 2018 (Cth)* (The Act) for the calendar year ended 31 December 2020 (CY20). It covers the activities of the reporting entity SA Power Networks (ABN 13 332 330 749) and entities owned and controlled by SA Power Networks. SA Power Networks is a partnership of corporations (“partner entities”):

- Spark Infrastructure SA (No. 1) Pty Ltd (ABN 54091142380)
- Spark Infrastructure SA (No. 2) Pty Ltd (ABN 19091143038)
- Spark Infrastructure SA (No. 3) Pty Ltd (ABN 50091142362), each incorporated in Australia; and
- CKI Utilities Development Limited (ABN 65090718880)
- PAI Utilities Development Limited (ABN 82090718951), each incorporated in The Bahamas.

The entities owned and controlled by SA Power Networks are:

- Utilities Management Pty Ltd (ABN 25 090 664 878)
- Enerven Energy Infrastructure Pty Ltd (ABN 31 621 124 909)
- Enerven Energy Solutions Pty Ltd (ABN 49 621 147 297)
- ETSA Utilities Finance Pty Ltd (ABN 78 091 701 825)
- ETSA FRC Pty Ltd (ABN 85 101 536 412)
- ETSA Ancillary Pty Ltd (ABN 87 101 536 421)

All references to our, we and us within this statement refer to SA Power Networks and the entities it owns and controls.

Foreword

Chairman's Statement



The past year has been a testing one for the people of South Australia and for our own people, as we have responded to the onset of the COVID-19 pandemic as well as a summer of devastating bushfires. The responses that we've all had to make have served to reinforce the human element of our business.

We are a people-centred business – whether this be our customers for whom we strive to keep the lights on, our workers who ensure that the electricity distribution network continues to supply South Australians, or our suppliers who, through their network across the globe, help us to keep our business running. We are committed to ensuring that human rights are respected and protected across our entire supply chain and operations.

While this is our first publicly reported Modern Slavery Statement, our commitment to minimising the risk of human rights violations in our operations and supply chains is not a new endeavour.

To date, we have taken a human-centred and collaborative approach in our actions to address modern slavery risks in our supply chain and operations. This has involved upskilling our procurement people on addressing supply chain modern slavery risks through external training, imposing obligations on our suppliers in their contracts to take efforts in eliminating modern slavery and developing a standardised industry approach to modern slavery through the development of a supplier questionnaire and risk management framework in collaboration with the Energy Procurement Supply Association (EPSA).

We look forward to monitoring and evaluating our performance over time and continuing to strengthen protections against the possibility of worker exploitation across our operations and supply chains.

A handwritten signature in blue ink, appearing to read 'Peter Tulloch', on a light blue background.

Peter Tulloch, Chairman

This statement was approved by the SA Power Networks and Enerven Boards on 9/3/2021.

CEO's Statement



This document marks our first formal Modern Slavery Statement and provides an overview of how we mitigate and address modern slavery risks in our workforce and extended supply chains, so we can play our part in upholding human rights and healthy labour practices throughout our operations.

Our values and commitment to 'doing what's right' drives how we engage our people, suppliers and communities. This top-level commitment is at the core of our business and frames our modern slavery action plan to reduce the risk of human rights violations with suppliers we engage with and our people.

We have practised what we preach on ethical procurement for many years with 2020 marking our fourth year of Ethical Procurement Supply certification by the Chartered Institute of Procurement and Supply (CIPS).

Our focus this year has centred around implementing a supplier risk assessment framework, amending procurement contracts to include robust anti-modern slavery provisions; up-skilling our people on key modern slavery issues; engaging with peers through the Energy Procurement and Supply Association (EPSA) on developing a standardised questionnaire; and whitepapers on sustainable procurement and human rights in the supply chain.

There is still more that can be done as this statement sets out, particularly regarding standardising supplier due diligence, evaluating performance and developing systems for non-compliance. We are deeply committed to expanding the work we have done thus far to safeguard people's rights throughout our extended supply chains and operations.

A handwritten signature in black ink, appearing to read 'Rob Stobbe', on a white background.

Rob Stobbe, CEO



1 About us

Who we are



SA Power Networks

SA Power Networks is the licenced Distribution Network Service Provider (DNSP) for South Australia.

We plan, build, operate and maintain South Australia's electricity distribution network which supplies power to approximately 900,000 local households and businesses. This includes:

- Operating a 24-hour faults and emergencies hotline.
- Maintaining street lighting for local councils and government.
- Taking readings of traditional SA Power Networks electricity meters.

We value our unique role in ensuring the South Australian electricity distribution network supports the needs and development of South Australia and its communities. SA Power Networks has proudly served South Australians for more than 70 years, initially as part of the Electricity Trust of South Australia, and then as a stand-alone distribution business established in the late 1990s when the electricity supply industry was transformed by a new regulatory framework.



Enerven

Enerven delivers integrated energy solutions to government and business customers across a range of terrains and geographies in South Australia and remote parts of the Northern Territory.

The key services we provide to customers across the energy and telecommunications industries include:

- Substation and transmission network construction and maintenance.
- Embedded Networks and private electricity network construction and management.
- Electrical and technical services, including metering.
- National Association of Testing Authorities (NATA) accredited calibration laboratory.
- Material sales and supply chain management.
- Engineering services, including LiDAR and drone services.
- Lighting Solutions, including public and private lighting construction, including smart lighting.
- Renewable energy project construction, integration, and maintenance, such as Solar PV and Battery Storage.
- Communication Network Solutions, including 5G.

Working together with innovators, partners, and customers, we are helping to change the way Australians connect with, generate, and use energy and data. By connecting ideas, people, and technology, we are constantly learning, adapting, and designing solutions that are safer, more sustainable, and more cost-effective.

About us

Our progress to date

We have already started to take strong action to identify and mitigate the risks of modern slavery in our operations and supply chain. These actions include:



Implementation of the *Informed 365* system to risk assess our supply base and issue a Modern Slavery Self-Assessment Questionnaire to our suppliers.



Undertaking externally facilitated modern slavery training with our procurement people to raise awareness and knowledge of The Act as well as possible actions to undertake.



Amending procurement contracts to include an anti-modern slavery clause.



Obtaining global Chartered Institute of Procurement and Supply (CIPS) Standard Certification and Ethical Procurement Supply Certification for the past four years.



Collaborating with peers through the Energy Procurement Supply Association (EPISA) to release whitepapers on sustainable procurement and respecting human rights in our supply chain.



Developing and releasing publicly available sustainable procurement statements for SA Power Networks and Enerven which split considerations into environmental, labour, community and business ethics.

Our plan for the future

SA Power Networks is committed to take actions to identify, assess and address modern slavery risks in our operations and supply chains. As part of this, we have set out the following roadmap to achieve this commitment through tangible, targeted and measured actions:



Undertake a program of regular modern slavery training across our workforce to maintain awareness and best practice.



Maintain CIPS Standard and Ethical Procurement certification.



Conduct an annual modern slavery risk assessment of our operations and supply chains.



Continue to add anti-modern slavery obligations into our supplier contracts.



Develop a process for regular monitoring of modern slavery risks including actions when found such as a company-wide approach to remediation.



Conduct a scoping exercise to consider an external third-party review of high-risk suppliers, with a focus on supplier compliance.



Continue to benchmark best practice, working with other energy businesses through EPSA.



Standardise modern slavery due diligence procedures across the business.



2 Structure, operations and supply chains

Structure

SA Power Networks is 51% owned by CK Infrastructure Holdings Limited and Power Assets Holdings Limited – both part of the Cheung Kong Group of Companies – and 49% owned by Spark Infrastructure (SA) Pty Limited.

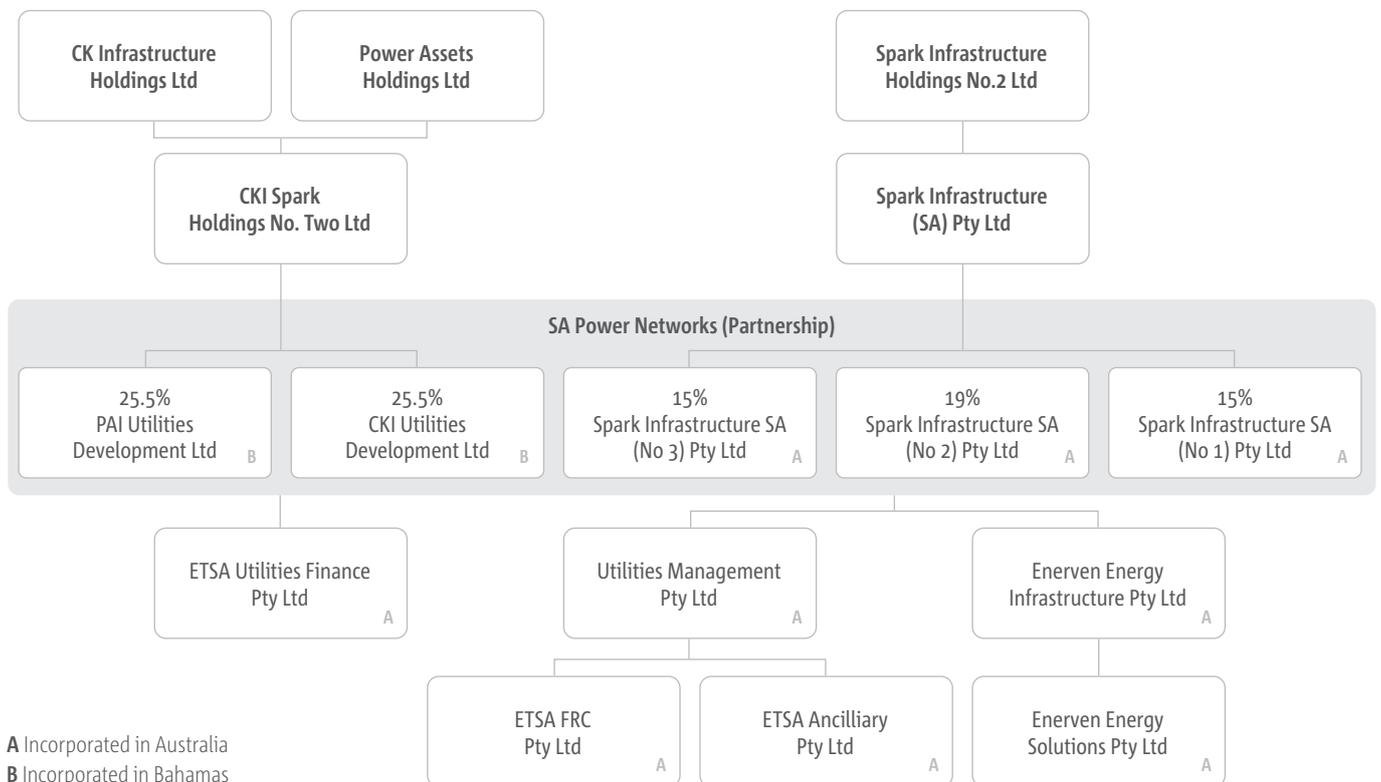
As outlined in the organisational and ownership structure below, SA Power Networks owns and controls several entities – all of which are covered by this statement.

- The group’s employees (both SA Power Networks and Enerven) hold formal contracts with Utilities Management Pty Ltd.
- The ETSA entities are entities without active business operations or supply chains and therefore exposure to modern slavery risks is considered low.

SA Power Networks employs approximately 1,750 people, while Enerven employs around 500 personnel. Both entities engage supplementary labour from contracted labour hire agencies on an as needs basis.

Our Board of Directors oversees our strategic direction and performance and provides support to our Executive Management Group. The following committees have also been established to assist with the responsibilities of the Board:

- **Audit Committee** – assists with financial reporting, maintaining an efficient system of internal control and promoting an ethical culture.
- **Risk Management and Compliance Committee** – 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.
- **Remuneration Committee** – reviews and makes recommendations on remuneration arrangements for our people.



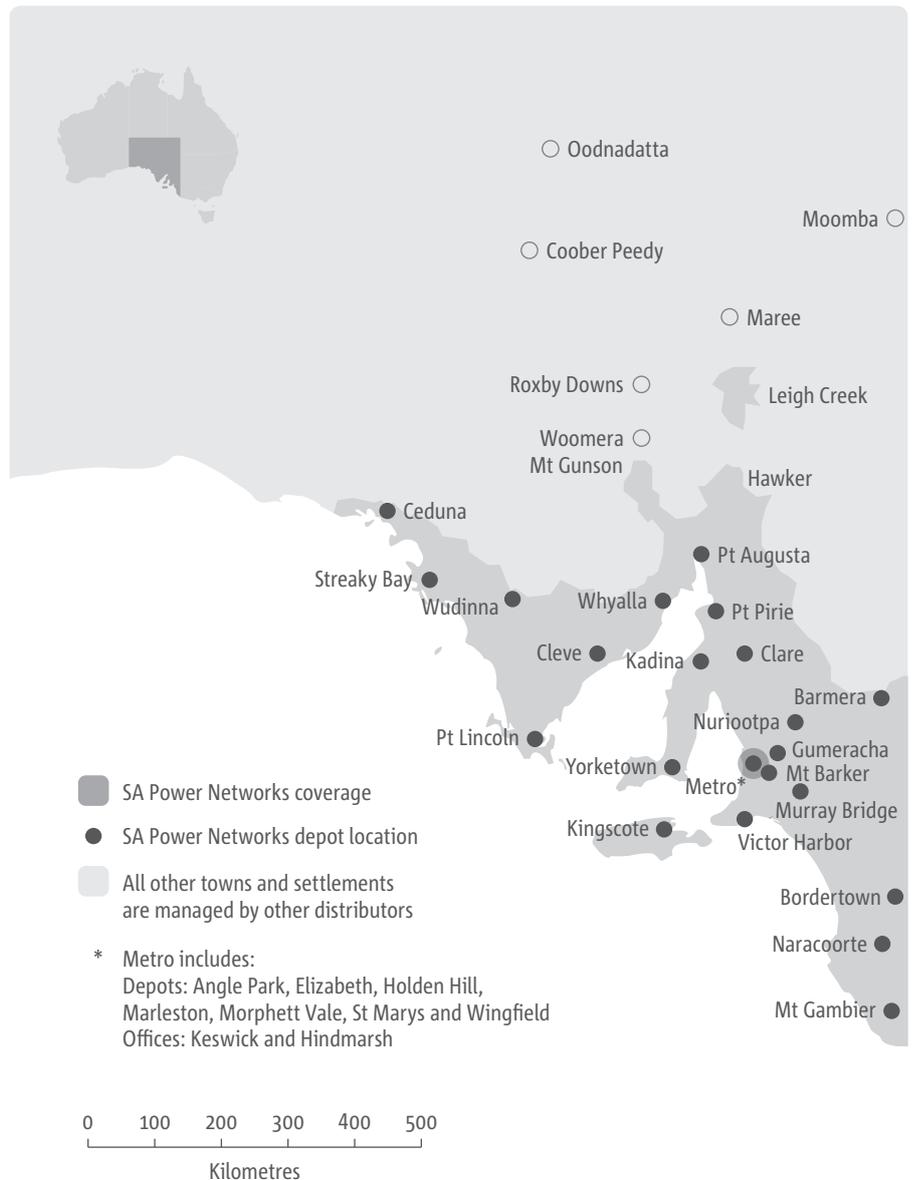
Operations

SA Power Networks operates the low-voltage distribution network throughout South Australia including powerlines, poles, meters, wires and substations. The electricity distribution network in South Australia covers more than 178,000km².

We supply electricity to approximately 900,000 customers ranging from isolated farms in rural areas to regional and metropolitan residential homes, businesses, industry precincts and city centres.

SA Power Networks undertakes the following activities as part of its electrical infrastructure operations:

- Delivery of electricity to residential and commercial users.
- Providing emergency response services in case of blackouts.
- Repairing street lighting.
- Reading SA Power Networks' electricity meters.
- Project management and construction and maintenance services for electrical infrastructure projects.
- Research and development activities for emerging energy products and services.



Structure, operations and supply chains

Operationally, SA Power Networks operates across nine business functions and Enerven operates as its own business entity (supported by Shared Services functions within the SA Power Networks group). The nine business functions are:


59%
direct
employees

Customer and Community

Our Customer and Community team assures that our commitments to our customers and the community in which we operate are upheld. This includes the delivery of reliable and safe power supply for our residential and business customers and our approach to genuine engagement with our stakeholders.


92%
direct
employees

Field Services

Our Field Services team is responsible for infrastructure services to the distribution network including operations, the delivery of capital projects and network upgrades, maintenance and supply restoration.


99%
direct
employees

Finance

Our Finance team is responsible for the management of our procurement, investment, financing and costing decision making.


100%
direct
employees

Governance and Regulation

Our Governance and Regulation team is responsible for risk management, regulatory compliance and providing broad consultative advice across the business at SA Power Networks.


97%
direct
employees

Innovation and Technology

Our Innovation and Technology team is responsible for all aspects of information technology and driving a culture of innovation across the organisation.


84%
direct
employees

Network Management

Our Network Management team is responsible for network engineering, network control and the asset management of the South Australian electricity distribution network. This includes our Future Network Strategy, detailing how we enable customers with new technologies such as renewable generation sources and equipment (for example, in-home battery storage and electric vehicles).


97%
direct
employees

People and Culture

Our People and Culture team provides support services to the business, including human relations, learning and development, occupational health and safety, fleet and facilities management, and environmental services.


100%
direct
employees

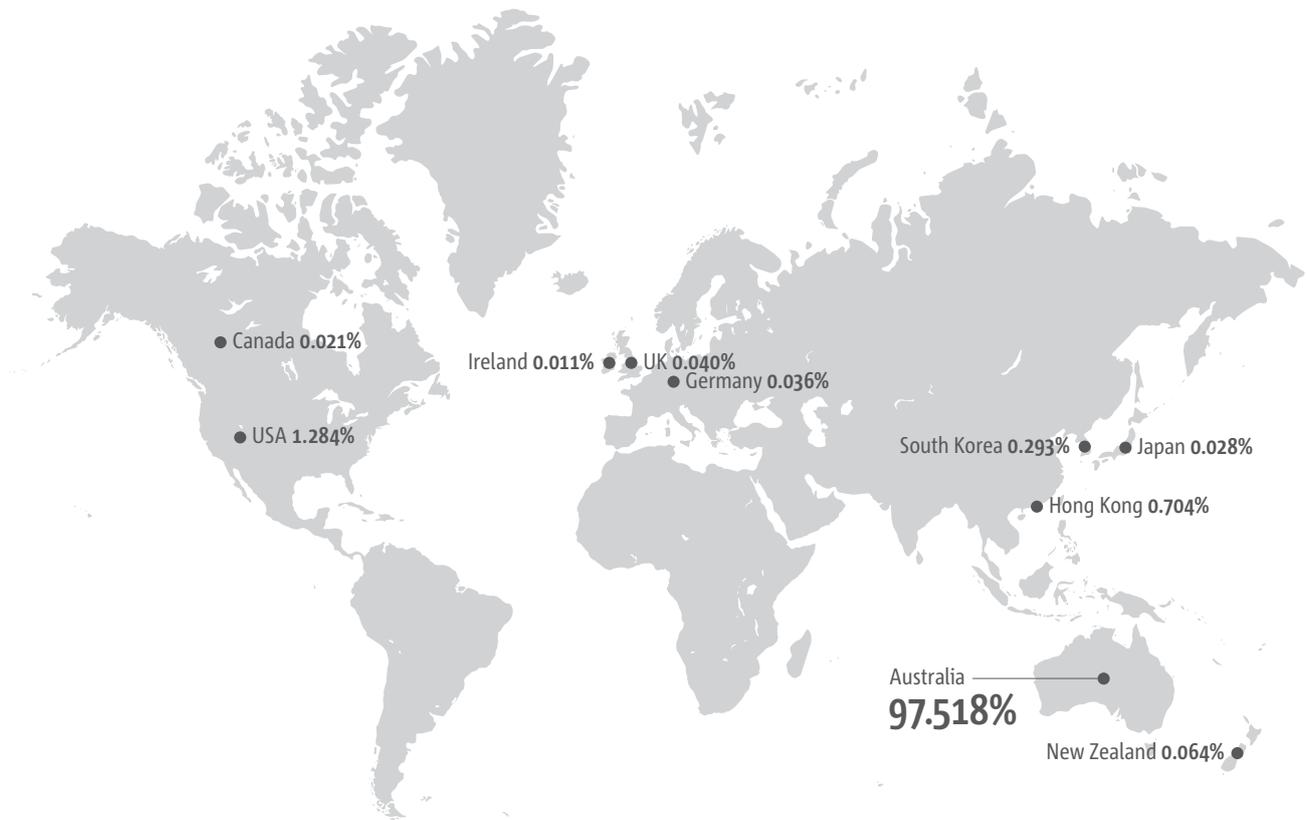
Strategy and Transformation

Our Strategy and Transformation team is responsible for the development of SA Power Networks' strategic plan, to manage the opportunities arising from customers' continued take-up of distributed energy resources, and the increasing challenges and risks posed by South Australia's ageing network infrastructure.


92%
direct
employees

Enerven

Enerven provides electrical and telecommunication infrastructure across the National Market. This includes the design, development, delivery, and management of safe and sustainable power systems and multi-utility networks for owners of major infrastructure.



Supply chains

We strive to engage in long-term stable relationships with our suppliers where possible. As at 31 December 2020, we have approximately 700 active formal procurement contracts across approximately 600 suppliers. SA Power Networks also engages suppliers for low value ad-hoc purchases under our general terms and conditions; approximately 1,400 suppliers are in our system for these purposes. Our supply base is actively monitored, and available suppliers maintained in our enterprise resource planning system to fulfil our business requirements under a governed process.

Of this approximate 2,000 suppliers, 98% (based on their direct engagement business locations) are based in Australia with a small number based overseas in Canada, Germany, UK, Hong Kong, Ireland, Japan, New Zealand, South Korea and the USA. Our Australian vendors are predominantly based in South Australia (68%), New South Wales (12%) and Victoria (13%).

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

3 Modern slavery risks in our operations and supply chain

SA Power Networks recognises that our main area of modern slavery risk comes from our external supply chains.

In the current reporting period, we conducted a high-level risk mapping exercise utilising Informed 365, based on analysis of our major operational and supply chain procurement activities focusing on supplier expenditure by sector and geography. The outcomes of this assessment have been summarised into these two key areas, and a final Informed 365 Slavery Risk Index (ISRI), as outlined on page 13.

Modern slavery and human rights risks are identified, assessed, and managed across SA Power Networks as a whole.

Industry risk

Based on supplier industry and expenditure, our top three key risk sectors¹ can be classified as construction, electrical equipment and employment services – each of which has a unique risk profile.



Construction & Engineering

The construction sector is characterised by large and complex international supply chains as well as large amounts of manual labour which create inherent modern slavery risks; the industry includes civil engineering companies and large-scale contractors. The largest risk source is from raw materials originating in countries or geographic regions with weaker working conditions and regulations. There is also inherently higher risk in the shipping of international construction materials to South Australia such as sub-minimum wages, poor living and working conditions and exploited labour practices.



Electrical Components & Equipment

This industry includes companies that produce 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 – much of which may occur under poorer working conditions, economies and governance structures.



Human Resource & Employment Services

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.

¹ In 1999, the Global Industry Classification Standard (GICS) was developed by MSCI in collaboration with S&P Dow Jones Indices to provide an efficient, detailed and flexible tool for use in the investment process. Its universal approach to industry classification aims to improve transparency and efficiency in the investment process. The GICS is designed with four levels of classifications that includes 11 Sectors, 24 Industry Groups, 69 Industries, and 158 Sub-Industries.

Geographic risk

As 98% of SA Power Networks' tier one 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 relatively low.

Further information on the prevalence of modern slavery within our tier one supplier countries (based on 2020 expenditure) according to the Walk Free 2018 Global Slavery Index Map, is referenced in the table below:

Tier 1 supplier country	Population	Prevalence Index Rank	Government Response Rating (A-D)	Est. Number Living in Modern Slavery	Est. Proportion Living in Modern Slavery	Vulnerability to Modern Slavery
Australia	23,799,556	163/167	BBB	15,000	0.65/1000	4.27/100
United States	319,929,162	158/167	BBB*	403,000	1.26/1000	15.88/100
New Zealand	4,614,532	164/167	BB	3,000	0.64/1000	1.91/100
Canada	35,949,709	166/167	BB	17,000	0.48/1000	10.20/100
Great Britain	65,397,080	132/167	BBB	136,000	2.08/1000	11.13/100
Hong Kong	7,245,701	156/167	CC	10,000	1.4/1000	24.68/100
Germany	81,707,789	134/167	BB	167,000	2.04/1000	10.44/100
South Korea	50,593,662	137/167	CC	99,000	1.95/1000	29.83/100
Ireland	4,700,107	147/167	BB	8,000	1.67/1000	10.35/100
Japan	127,974,958	167/167	CCC	37,000	0.29/1000	13.81/100

*This country could not score above a BBB as it received a negative rating for policies that hinder their response to modern slavery.

Informed 365 Slavery Risk Index Summary

Considering the supply industry and geographical risk profiling during the reporting period, we can summarise our ISRI profile. With possible ratings of Very Low, Low, Medium, High and Very High, our supply base risk profile did not exceed a Medium rating.



Sample of Medium rated supply industries engaged by SA Power Networks:



Construction & Engineering



Electrical Components & Equipment



Human Resource & Employment Services



Heavy Electrical Equipment



Trucking



Steel

Automotive Retail



Software

4 Our approach to assessing and addressing modern slavery

SA Power Networks has undertaken a modern slavery risk assessment using Informed 365 software in collaboration with peers through the EPSA.

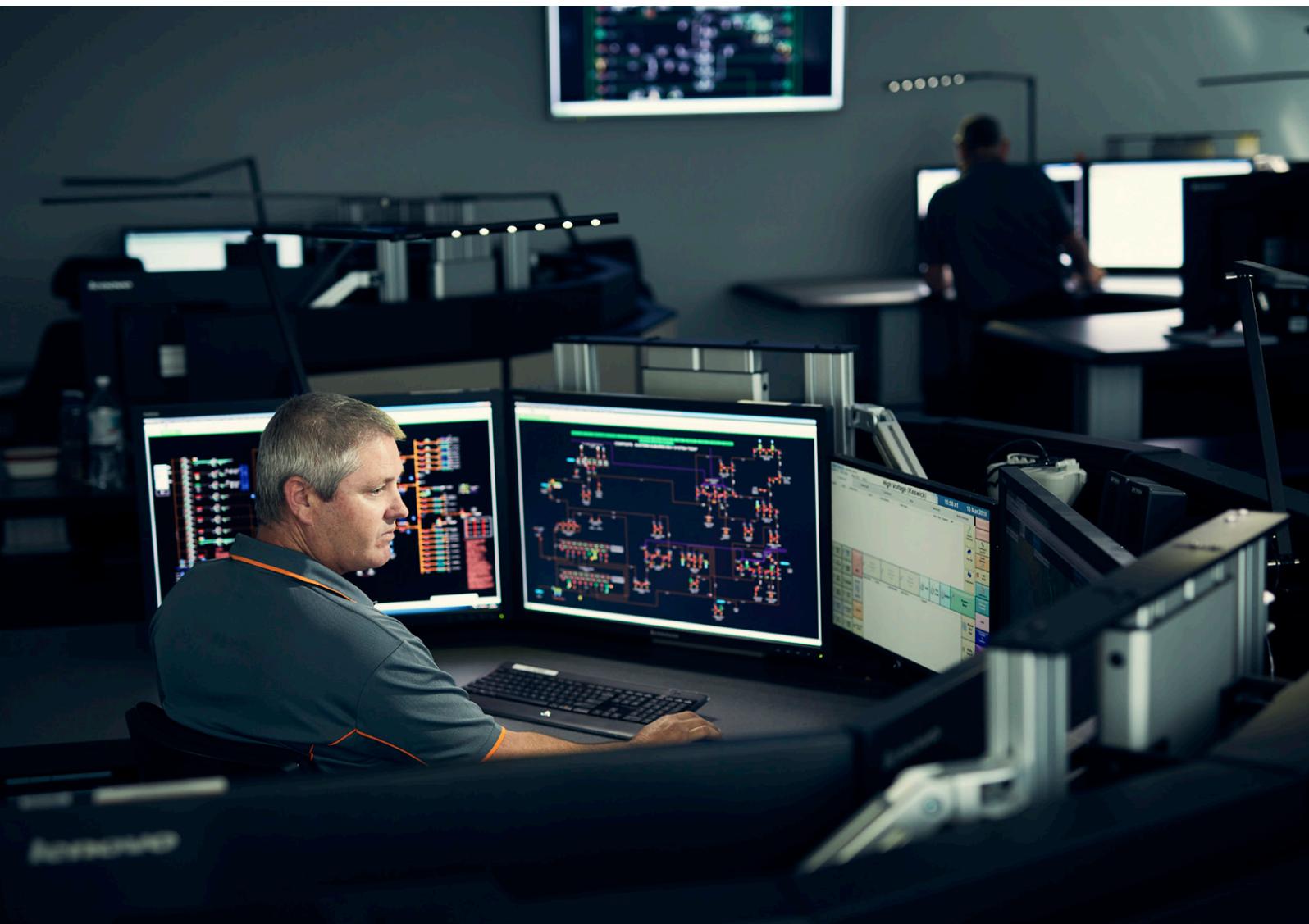
As part of Informed 365's Supply Chain Management, each supplier is allocated a risk rating based on a country and industry risk rating matrix (refer to previous section).

The modern slavery risk rating calculation adheres with the United Nations Environment Programme guidelines for Social Life Cycle Assessment (LCA). The LCA is an ISO standardised framework for the assessment of social and environmental impacts of goods, services, and organisations. Each procurement category was screened for five social risk categories:

- Labour Rights & Decent Work
- Health & Safety
- Human Rights
- Governance
- Community Infrastructure

We note this was not operational for the whole of 2020, though will be for the 2021 reporting period and subsequent years. This is an ongoing process that will happen in real time as suppliers are entered into the system rather than only being considered at a point in time.

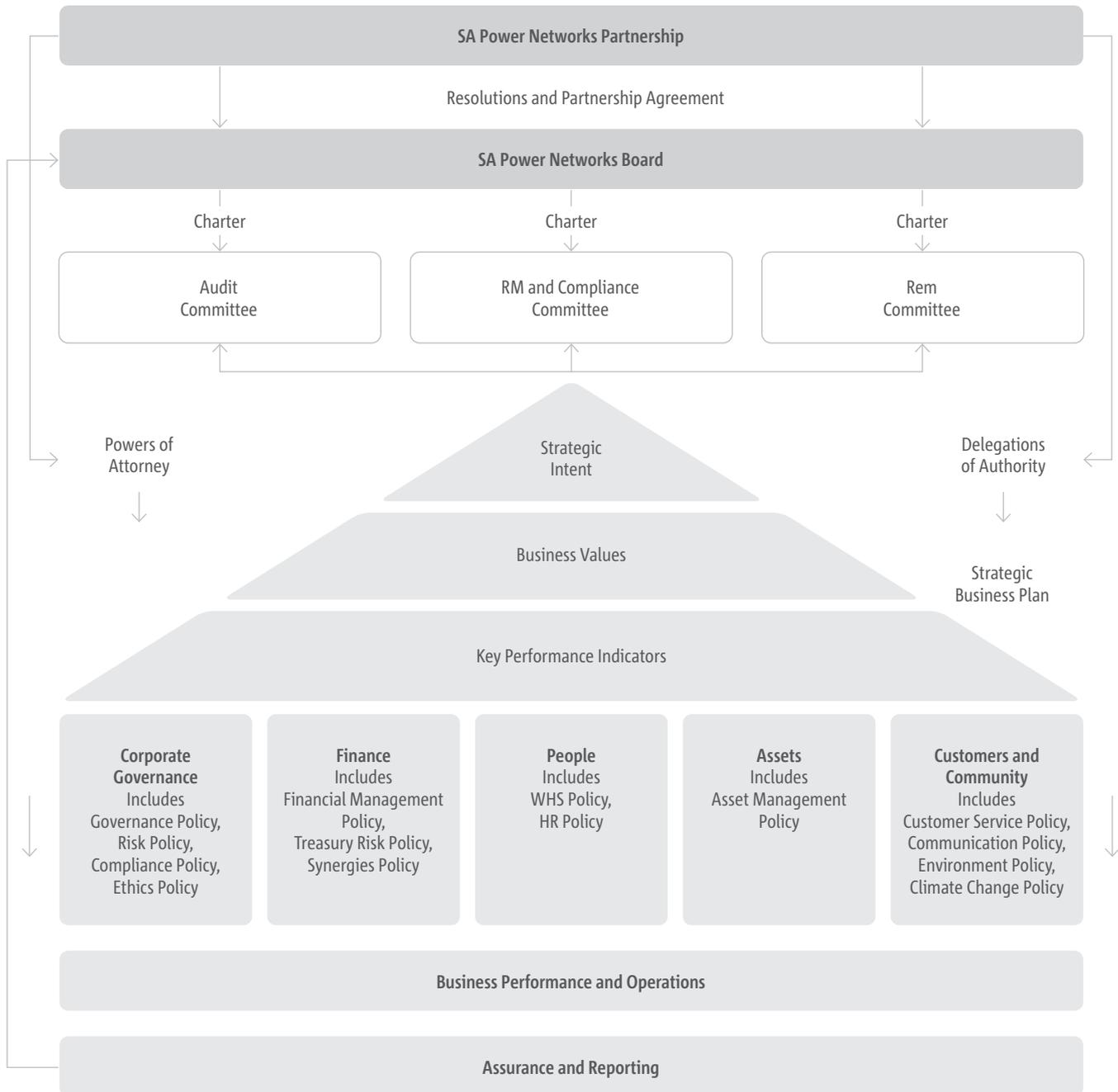
This risk assessment exercise has allowed us to begin a process of assessing and addressing modern slavery risks across our operations and supply chains. Beyond this, our current approach to managing modern slavery is incorporated into our company-wide governance structures, policies and procedures, training, industry engagement and remediation processes. However, we recognise that more can be done so we have committed to further formalise our approach to modern slavery risk identification, management and due diligence in 2021.



Operational and supply chain due diligence

Governance

Our company-wide governance framework acts to mitigate against modern slavery risk in our operations and supply chain. Under our Board, sits our Risk Management and Compliance Committee, which has specific direction from the Board to consider modern slavery risks as they apply to our business and supply networks. This is expressed in writing through our policies around ethics and human rights and in our operational culture through a strong tone from the top.



Our approach to assessing and addressing modern slavery

Risk management

SA Power Networks utilises risk management principles in all aspects of the business and recognises that significant risk can arise from any of the organisation's functional groups and work streams, including in strategic planning activities. Risk management is embedded in the risk identification, analysis, evaluation, treatment, monitoring and reporting activities of the business. We aim to incorporate risks related to modern slavery into our risk management process in 2021 though note it is not currently incorporated into our Enterprise Risk Management (ERM) framework.

SA Power Networks utilises a suite of tools that deal with the assessment of risk in a consistent manner across business functions. Matrices used for the assessment of consequence, likelihood, control effectiveness and management response have been developed for qualitative analysis in many areas, additional techniques are used for more complex assessments. For risk profiling sessions the scoring of risk and opportunity can be reported in a consistent manner by using the matrices developed for qualitative analysis. Modern slavery will be incorporated into these tools in the coming year.

Due diligence

Supply chain due diligence

SA Power Networks is proud of our sustainable procurement practices and partner with like-minded suppliers who share the same commitment to:

- Comply with local, national and international environmental standards, laws and regulations.
- Ensure transparency, confidentiality and fairness at all stages of the procurement process.
- Declare any identified conflicts of interest that may arise.
- Not engage in acts of bribery and corruption.
- Support the development of local and small business.
- Demonstrate corporate social responsibility by reviewing its supply chains including, modern slavery and labour conditions, health and safety, diversity and inclusion and environmental impact.

We employ a Strategic Sourcing Framework (SSF) as our due diligence mechanism in the procurement source to contract process that provides both practical guidance and a core structure for those undertaking sourcing activities for goods and/or services provided to SA Power Networks. Within this guideline we provide detail over higher risk categories and our sustainable procurement tender response questionnaire. Supporting the SSF are the Evaluation Guidelines which outline the following:

- Confirmation of the preferred evaluation process.
- A consistent weighted criteria methodology for tender assessments.
- Clear responsibilities of behaviours expected of SA Power Networks representatives involved in the tender evaluation process.
- Post evaluation activities.

Operational due diligence

We take a proactive approach to modern slavery due diligence in our internal operations by creating a positive culture where our people are comfortable speaking up and are aware of their rights. We do this through a strong positive tone set by executive management and document this through our relevant policies and procedures (listed below) which all of our people have access to. Leaders across our business are encouraged to be aware of and be vigilant around the risk of modern slavery within our workforce – 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.

Policies and procedures

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

- **HR and Ethics Policy:** sets out ethical expectations for all people within SA Power Networks.
- **Discrimination, Bullying and Harassment Guideline:** provides guidance to SA Power Networks' people regarding their responsibility to provide a workplace free from discrimination, bullying and harassment.
- **Fair Treatment Guideline:** sets out guidance to ensure a work environment that allows all of our people to work to their full potential and to promote a work environment which is free from unlawful discrimination, harassment and other unlawful acts.
- **Equal Opportunity, Fair Treatment and Diversity Directive:** provides direction to SA Power Networks' people regarding equal opportunity, fair treatment and encouragement of diversity in employment at SA Power Networks.
- **Code of Conduct:** provides expectations of our people regarding integrity, the fair treatment of others, safety, conflicts of interest, drugs and alcohol, corporate gifts, lawfulness, confidentiality, media comments, environmental sustainability and out of hours conduct; and is supported by a mandatory eLearning module for our people.
- **Supplier Compliance:** administered through the insertion of an anti-modern slavery clause in our contracts and in our compliance with CIPS certifications (Ethical Procurement and Supply Certification and the Procurement Excellence Programme).

Training

SA Power Networks' procurement people have undertaken externally developed Modern Slavery Act training by Ernst & Young to strengthen our modern slavery risk management framework relating to our supply chains. The training was conducted in November 2020 and included the broader human rights agenda including key human rights issues within the energy services sector and provided an overview of SA Power Networks process and documents in place.

In addition to this, our procurement people undertake the CIPS Ethical Procurement and Supply online eLearning annually which awards corporate certification to SA Power Networks.



Industry engagement

We actively engage in external procurement certification (through CIPS) and benchmarking with our peers through the EPSA. We are currently engaged with the EPSA to standardise and streamline modern slavery risk identification including the development of a supplier questionnaire. Recently, we have contributed towards the EPSA's release of two whitepapers covering sustainable procurement and respecting human rights in our supply chain.

From a certification perspective, we have been CIPS Standard certified for the past 4 years signalling that we have:

- Effective governance for supply assurance and compliance.
- Gained greater influence over spend.
- Demonstrated the value procurement brings.
- Built credibility, visibility and confidence in procurement.
- Consistency in organisation-wide procurement activities.

As stated within our publicly available sustainable procurement statement:

SA Power Networks employees, contractors and suppliers are expected to comply with and promote the principles outlined in this Statement and ISO20400 Sustainable Procurement.

When the sustainable procurement statement was published in October 2018, it was issued to all of our suppliers. The statement is currently issued to all new suppliers when onboarded with us, and within this statement we address modern slavery:

SA Power Networks does not support any form of modern slavery within its workforce or supply chain. Suppliers, direct or indirect, involved in human trafficking, forced or child labour, slavery or the deceptive recruitment of labour, are required to cease their supply immediately to SA Power Networks and will be reported to the required authorities under law. Suppliers will be asked to provide detailed supply chain information on their goods and services and to declare any identified or perceived labour concerns to SA Power Networks.

Remediation

Our external supply chain

It is noted that there were no modern slavery risks raised for remediation in our supply chain in 2020. Remediation for issues of concern in our contractual relations are addressed on a case-by-case basis through our modern slavery and relevant dispute resolution contract clauses.

In the event that we do 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. Where a satisfactory resolution cannot be achieved, alternative measures will be implemented, which may result in the termination of the supplier's relationship with SA Power Networks.

Our operations

We have a four-stage grievance mechanism set out in our Utilities Management Pty Ltd Enterprise Agreement 2018 that is available to employees for certain concerns. These four steps are:

- 1 The employee and their leader will meet to identify and define the matter causing concern. The employee and leader will discuss the matter in a genuine attempt to resolve the issue. If the matter remains unresolved, then
- 2 The problem is to be described in writing by the leader and referred to the manager for resolution. If required, additional parties may be identified and brought into discussions to assist in achieving a resolution. If the matter remains unresolved, then
- 3 Utilities Management and the employee and their representatives (if requested) will make a further attempt to resolve the issue. If the matter remains unresolved, then
- 4 Any of the parties may refer the matter to the Fair Work Commission for conciliation and/or arbitration, or where the parties agree, to an alternative independent mediator.

5 Measuring our effectiveness

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

As part of this process, we conduct a review of our relevant policies and procedures annually to ensure they support us measuring and assessing the effectiveness of our modern slavery risks. Additionally, we have in place a legal compliance system that includes reporting to the Board Audit Committee twice a year for review. The legal compliance system contains a specific section on modern slavery that addresses our compliance to the relevant legislation.

In the current year, we have placed a focus on the establishment of risk identification and management processes but in future periods we aim to further build on our capacity to measure and evaluate the effectiveness of our actions to address the risks posed by modern slavery. Moving forward we are aiming to develop a comprehensive modern slavery risk management framework and due diligence processes which include opportunities to measure the effectiveness of our practices in collaboration with our peers through the EPSA.

Responding to COVID-19

COVID-19 has increased economic and social uncertainty, with profound disruption to supply chains through changed demand, forced border closures and changed production conditions. We acknowledge that the effects of COVID-19 have disproportionately impacted society's most vulnerable and potentially heightened the risks of modern slavery, particularly where our products originate in developing countries. We have taken a human centred approach that balances the ability to keep the lights on with keeping our communities, our people and broader supply chain workers safe. This has involved maintaining our supplier relationships through open communication and collaborating with our people, peers and peak bodies with respect to the risks of modern slavery.



6 Stakeholder engagement and consultation

The content of this statement applies to all entities owned and controlled by SA Power Networks. Internal and external subject matter experts (across all reporting entities and business units) were involved in preparing and reviewing this statement.

More broadly we have been active in our consultation and collaboration with the EPSA on standardising our modern slavery approach as an industry. This has included contributing to EPSA whitepapers on sustainable procurement and respecting human rights in our supply chain, as well as the development of a modern slavery supplier questionnaire. As a member, we engage with other EPSA member organisations monthly as a minimum and have two procurement people who sit on the EPSA Management Committee.

Consultation was undertaken at Board level through consideration and approval of this statement by both the SA Power Networks and Enerven Boards.



7 Additional information

We acknowledge that this is the beginning of a committed journey in which we shall continue to minimise the risk of modern slavery in our operations and supply chains.

We have already undertaken substantial action as detailed in this statement, though recognise there is always more that can be done. A large focus for future action will involve monitoring and evaluating our performance over time and we look forward to delivering this progress in future modern slavery statements alongside our roadmap.

Roadmap of future commitments

- Undertake a program of regular modern slavery training across our workforce to maintain awareness and best practice.
- Maintain CIPS Standard and Ethical Procurement certifications.
- Conduct an annual modern slavery risk assessment of our operations and supply chains.
- Develop a process for regular monitoring of modern slavery risks including actions when found such as a company-wide approach to remediation.
- Continue to add anti-modern slavery obligations to our supplier contracts.
- Conduct a scoping exercise to consider an external third-party review of high-risk suppliers, with a focus on supplier compliance.
- Continue to benchmark best practice, working with other energy businesses through EPSA.
- Standardise modern slavery due diligence procedures across the business.

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