

Modern Slavery Statement

FY2022



Introduction

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of this land and we pay our respect to their Elders past, present and future.

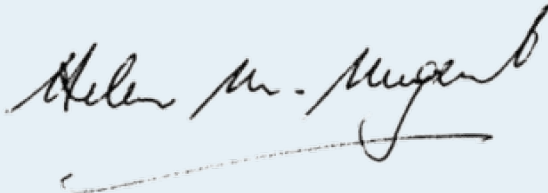
BOARD APPROVAL

This Modern Slavery Statement (**Statement**) is jointly made by:

- 1. PLUS ES Partnership (ABN 30 179 420 673) (**PLUS ES**)
- 2. PLUS ES Management 1 Pty Ltd (ABN 33 622 269 907) (PEM 1);
- 3. PLUS ES Management 2 Pty Ltd (ABN 39 622 269 934) (PEM 2); and
- 4. Active Stream Pty Ltd (ABN 32 603 459 267) (Active Stream),

(together, the PLUS ES Group (**PLUS ES**), pursuant to the Modern Slavery Act 2018 (Cth) (the **Act**) enacted on 1 January 2019.

This Statement is for the financial year 1 July 2021 to 30 June 2022 (the **reporting period**), and is approved and endorsed by our Board, which is the principal governing body of PLUS ES.



Dr Helen Nugent AC
Chairman PLUS ES
6 December 2022

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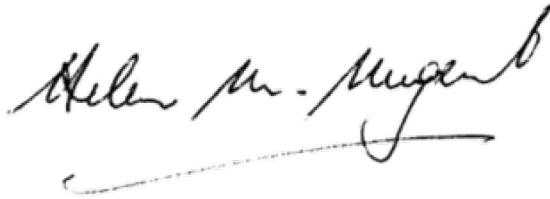
Chairman of the Board message

This Statement outlines how PLUS ES is managing its modern slavery risks in our operations and supply chains.

Human rights are an important issue, and organisations such as PLUS ES have a critical role in ensuring that the goods and services we buy do not support or contribute to any negative impact. The PLUS ES Group commits to respecting the human rights of our employees, the communities we operate within, and those we indirectly engage with through our supply chain.

The Board considers the measures highlighted in this document, combined with PLUS ES's strong values, ethics and proactive engagement with our business partners, are helping to reduce modern slavery risks.

The Board of PLUS ES has approved and endorsed PLUS ES's Statement as required by the Act.



Dr Helen Nugent AC
Chairman PLUS ES



CEO message

The leadership team of the PLUS ES Group oppose the use of modern slavery practices.

We recognise the importance of human rights and the need to provide protections to those who support our organisation through the goods and services we procure.

The measures detailed in this document provide a strong framework for reducing the risk of modern slavery practices in our supply chains and operations.

In fulfilling our purpose to 'connect communities and empower lives', we ensure that our own workforce can work in a safe and healthy environment, have freedom of association, and are remunerated fairly.

Through our newly developed Modern Slavery Roadmap, we will continue to harness opportunities to identify and mitigate modern slavery risks in the areas that we can control and influence.



Richard Gross
CEO PLUS ES



About this Modern Slavery Statement

PLUS ES is committed to human and labour rights and to the global eradication of modern slavery in all its forms.

PLUS ES is a reporting entity pursuant to the Act.

This Statement excludes PLUS ES's affiliates Ausgrid, Ausgrid Asset Partnership, Ausgrid Management Pty Ltd and Ausgrid Finance Pty Ltd, which have jointly submitted their own Modern Slavery Statement. This Statement has been prepared by addressing the mandatory criteria for content set out in the Act.

In general terms, modern slavery captures situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom and includes the following categories of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

We welcome the measures implemented by the Act and are pleased to communicate our ongoing and developing response to tackling this serious and important issue in this Statement.

This Statement records our areas of risk, the actions we have taken and are taking, and how we measure the effectiveness of these actions in eliminating the risk of modern slavery in connection with our business and supply chain.

We will continue to work with our business partners to raise awareness of this issue, communicate our expectations and take actions to eliminate modern slavery risks in our business.

Our Purpose

Connecting communities, empowering lives

Our Vision

Our vision is for customers to have a resilient, affordable, and net-zero future

Our Values

- Work safe, live safe
- Customer-focused
- Commercially minded
- Agile
- Collaborative
- Honest and accountable
- One Team
- Respect

About PLUS ES

Our structure

- PLUS ES Partnership (ABN 30 179 420 673), trading as PLUS ES, is a partnership carried on under that name by:
- a. Blue PES Partner Pty Ltd (ACN 622 175 428) as trustee for the Blue PES Partner Trust;
 - b. ERIC Alpha AUP Corporation 1 Pty Ltd (ACN 621 524 374) as trustee for ERIC Alpha AUP Trust 1;
 - c. ERIC Alpha AUP Corporation 2 Pty Ltd (ACN 621 524 454) as trustee for ERIC Alpha AUP Trust 2;
 - d. ERIC Alpha AUP Corporation 3 Pty Ltd (ACN 621 524 525) as trustee for ERIC Alpha AUP Trust 3; and
 - e. ERIC Alpha AUP Corporation 4 Pty Ltd (ACN 621 524 605) as trustee for ERIC Alpha AUP Trust 4.

A consortium comprising IFM Investors, AustralianSuper and APG Asset Management holds a 50.4% partnership interest in PLUS ES. The New South Wales (NSW) State Government, through entities established in accordance with the Electricity Retained Interest Corporation Act 2015 (NSW), holds a 49.6% partnership interest.

PLUS ES directly and through its subsidiaries has 286 employees who are all based in New South Wales, Queensland and Victoria, Australia. Our head office is located in Sydney.

74% of our staff working under the PLUS ES brand (excluding labour hire and contractors) are covered by an enterprise agreement and our employees are free to associate with the unions that represent their sector.

More details about the group structure of PLUS ES are set out at the end of this Statement.

Our operations

PLUS ES is dedicated to helping Australian businesses optimise their energy consumption through advanced data delivery and end-to-end energy infrastructure solutions.

We are a one-stop shop and the go-to-experts in the end-to-end delivery of contestable metering and infrastructure services.

PLUS ES was launched in late 2017. As a separate legal entity, PLUS ES is an independent affiliate of the broader Ausgrid Group and is ring-fenced from the regulated Ausgrid network (electricity distribution) business.

In response to the Australian Energy Regulator’s (AER) Ring-fencing Guideline – Electricity Distribution dated October 2017, which required electricity networks to separate regulated distribution services from other services that they provide, the former Ausgrid TCA Metering and Infrastructure Services team were transferred to the new entity PLUS ES

In late 2017, PLUS ES also acquired the metering services company Active Stream Pty Ltd.

The amalgamation of these businesses mean that PLUS ES is a strong market participant which combines 20+ years of experience from these entities.

We offer a range of services across Australia in the following areas:

Metering and Data

We provide metering services for large and small markets and are a registered Metering Coordinator, Meter Provider and Meter Data Provider. In December 2017, we acquired Active Stream and combined it with our metering business that had been ring-fenced from Ausgrid.

Telco Infrastructure

We provide services in building, owning and/or operating telecommunications infrastructure including end-to-end wireless and cable networks.

Elec. Infrastructure

We provide services in building, owning and/or operating high voltage infrastructure, from design, construction and commissioning, to ongoing maintenance and support.

Testing & Calibration

We have a calibration laboratory at Silverwater in Sydney, that is a state-of-the-art facility that holds NATA accreditation and is an authorised service and repair agent for Fluke and Doble instruments.

Embedded Networks

We provide complete turnkey solutions from meter installation and set-up, to ongoing meter data management

Our supply chain

PLUS ES engages its affiliate, Ausgrid, as its procurement service provider and benefits from the governance, policies, procedures and expertise it has in providing the goods and services PLUS ES needs. This excludes procurement activities relating to electricity services.

The diverse nature of our business means that we need to access an extensive global supply chain to provide the range of components and services we need from domestic and international suppliers. Our international supply chain is mostly limited to goods and services from Asia.

Many of the goods and services that we procure have complex supply chains containing multiple suppliers and manufacturers (including from overseas) providing the raw commodities, components and services to produce the end-product or service.

Our high spend critical categories are:

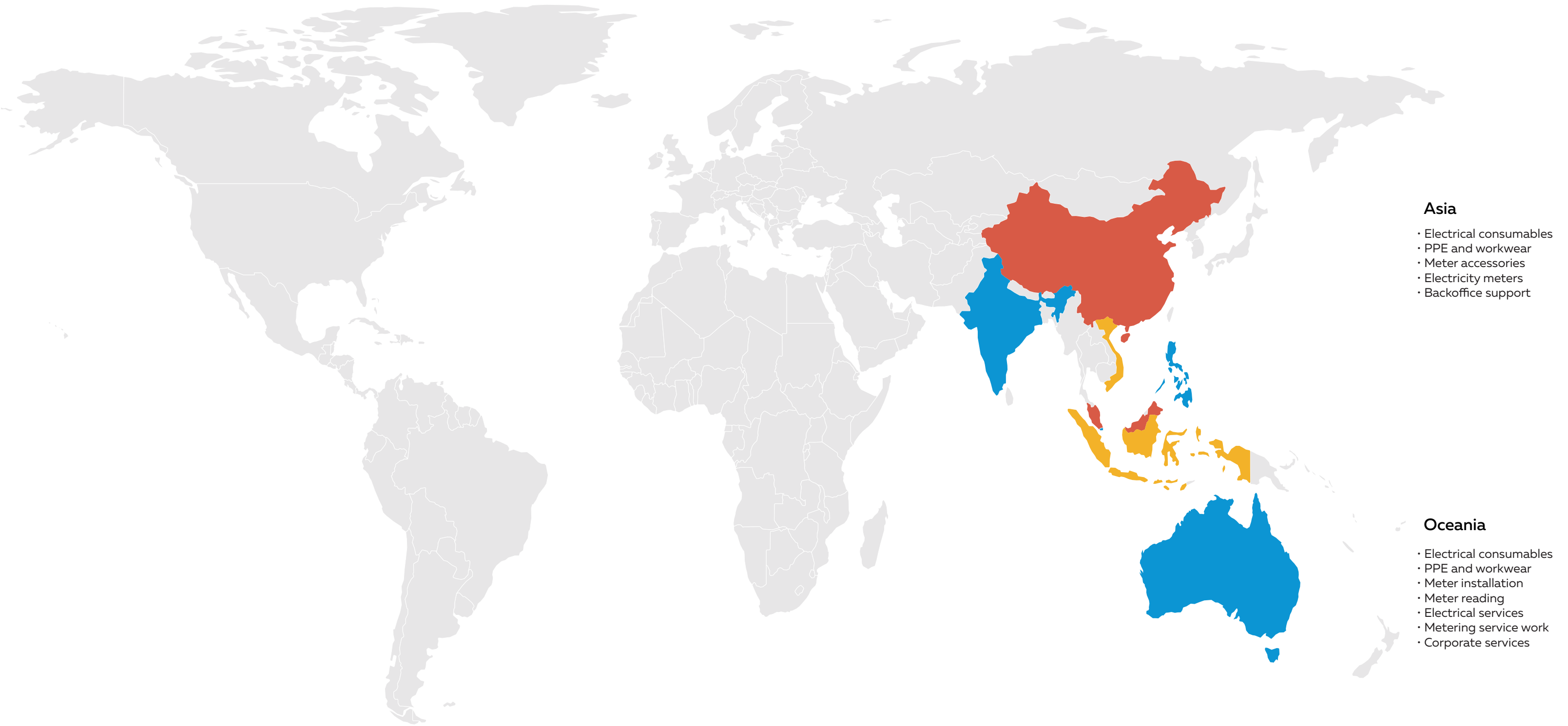
- Electrical consumables
- Personal protective equipment (PPE) and workwear
- Meter accessories
- Electricity meters
- Meter installation
- Backoffice support
- Meter reading
- Electrical services
- Metering services work
- Corporate services



We work collaboratively with our affiliate Ausgrid and leverage its procurement governance, policies, procedures and expertise to mitigate modern slavery risks in our supply chain.

Our supply chain

PLUS ES suppliers of goods and services



KEY

- Primary and secondary
- Primary
- Secondary

NOTES

This map shows countries where PLUS ES has contracts to source goods and services. Countries marked as secondary suppliers are those that provide goods and services to PLUS ES contracted suppliers.

These secondary suppliers are a sample of suppliers and service providers based on our initial supply chain mapping. We will continue to engage with our primary suppliers to strengthen our supply chain mapping to improve our supply chain visibility.

Our supply chain risks

The complex nature of our supply chain means that there are risks that PLUS ES may be linked to modern slavery practices.

As outlined in 'Our Supply Chain' on page 5, PLUS ES has 10 categories of goods and services that it procures. We assessed each of these categories to determine their level of risk for modern slavery practices.

From our risk-based assessment we identified four of these 10 categories as higher risk and one as high risk. These are higher and high risk due either to their country of origin and/ or as a result of the internationally recognised modern slavery risks associated with the category of goods or services.

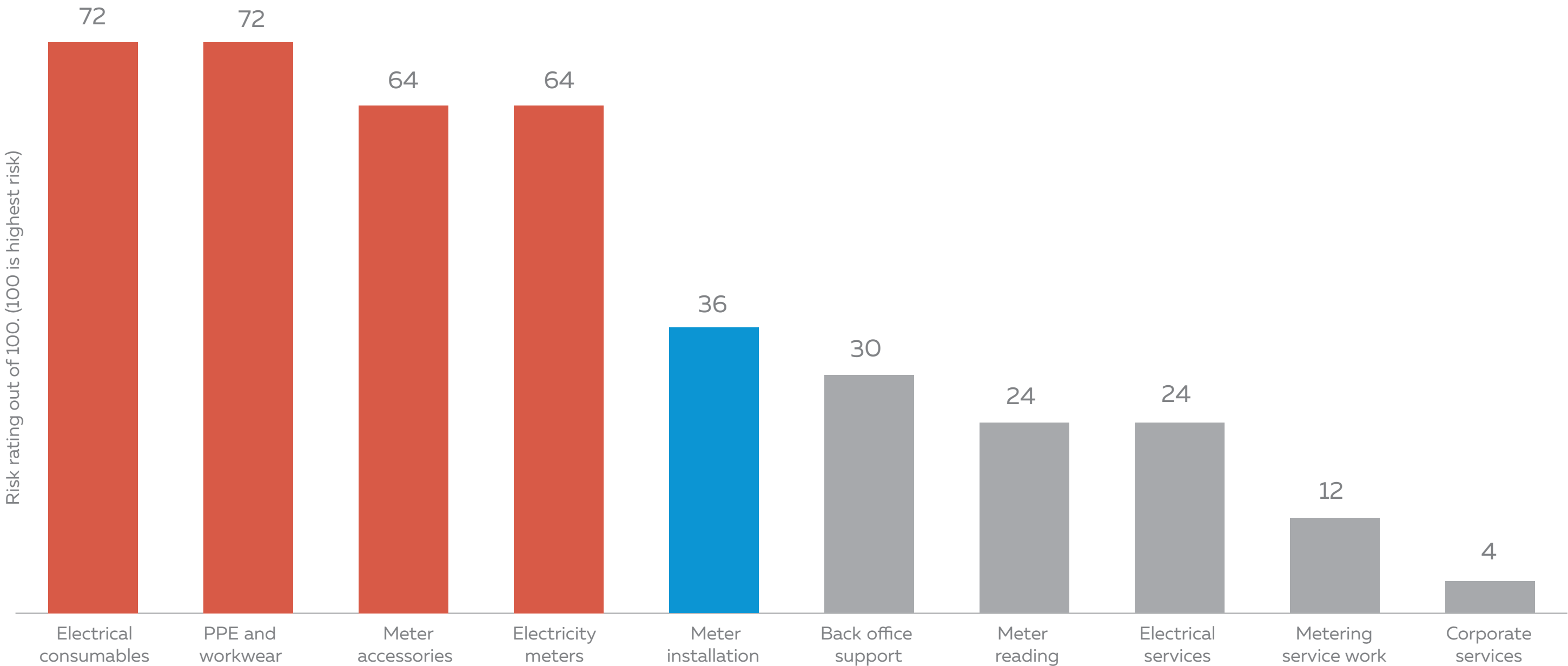
Sources used to inform our assessment include the: Global Slavery Index; Responsible Investment Association Australasia; and Minderoo Foundation.

Identifying our higher risk areas allows us to prioritise and focus our efforts on those areas with the greatest potential for the existence of modern slavery.

Our higher risk categories are identified as: electrical consumables, PPE and workwear, meter accessories and electricity meters. Meter installation is high risk.

COVID-19 has had a direct impact on global supply chains and operations. This has resulted in greater worker vulnerability and increased the risk of modern slavery in the delivery of goods and services to PLUS ES. PLUS ES has taken additional measures to work with its suppliers to understand the potential impact of COVID-19 on the security of supply of goods and services and worker health and safety. See next page for further details.

PLUS ES risk score of categories



Actions to actively manage our risks



We understand that modern slavery can be an invisible risk with its presence either not fully understood by all stakeholders or it occurring at arm's length in our business transactions.

We believe that to tackle modern slavery risks, we need to actively manage these in multiple ways to increase awareness and have meaningful protections.

Our approach is to target actions across the following areas:

- Policies and procedures**
Having frameworks, policies and procedures across the Ausgrid Group that communicate our intent, expectations and assist in managing our modern slavery risks.
These frameworks, policies and procedures will continue to evolve to capture our progression and developing maturity.
- Due diligence**
Conducting regular risk-based assessments to identify our risk areas to inform our mitigation approach and next steps for improvement.
Proactively engaging with our suppliers and business partners, collaborating with our industry peers, and actively investigating areas of concern.

Continuous improvement and training

Identifying ways we can improve our management of modern slavery risks, implementing these into our business practices, and providing relevant information and awareness to our employees and external partners.

Conflict and shortages

The last 12 months has seen supply chains continuing to be constrained. The impacts of COVID-19 have continued and have been compounded by product shortages of raw materials, increasing lead times and the disruption of logistics.

The emergence of Geo-political tensions in Europe and escalating cost in international sea freight has seen PLUS ES maintain consistent open dialogue with its supply partners to proactively assess its ongoing supply chain risk.

COVID-19

To manage COVID-19 impacts on our operations and to protect the health and safety of our employees and suppliers, we took a range of measures over FY21 and FY22:

- Ensuring that our suppliers can continue to provide essential goods and services to PLUS ES during the COVID-19 pandemic to support our operations.
- Implementing COVID safe plans with our suppliers and understanding measures they have in place to protect their workforce from COVID-19.
- Executing additional stringent procedures to provide workers with a safe environment and minimise the risk of infection.



CASE STUDY

Split workforce

With COVID-19 cases increasing in NSW and the emergence of Local Government Area lockdowns, suppliers resorted to implementing business continuity plans.

PLUS ES worked closely with suppliers in providing a priority forecast for goods and services, to minimise any additional burden on suppliers. This allowed suppliers to implement plans for their workforce to continue providing services and goods in their restricted areas. This ensured the safety of their employees from COVID-19 and ensured their workforce was not subject to unreasonable working demands.

Policies and procedures

We believe we have solid foundations for managing modern slavery. Our policies and procedures provide us with a platform for continual improvement and engagement with our supply chain.

Sustainable Procurement Policy

In recent years we have been working to make our organisation more sustainable. With procurement having such a large environmental, social and governance impact, we have developed our own Sustainable Procurement Policy that includes our commitments and considerations on social issues such as the responsible labour practices of our suppliers.

Procurement procedures

Our process for assessing tenders is mature and follows a rigorous process. We provide clear information on our requirements and expectations for our external partners. Our assessments are made on the cost and quality of suppliers' goods and services and on other important metrics such as health and safety, environmental and social performance, and how they address and manage modern slavery risks.

To demonstrate that our suppliers have awareness of modern slavery risks, and are taking action to address these risks, we require suppliers to:

- agree to be bound by our External Partner Code of Conduct which explicitly requires them to identify and mitigate risks, and eliminate any forms of modern slavery;
- comply with our policies and procedures which address modern slavery; and
- respond to surveys regarding modern slavery as part of our tender processes.

External Partner Code of Conduct

Our External Partner Code of Conduct communicates our expectations of our external partners and their supply chains in providing goods and services to PLUS ES. It outlines our expectations, encourages positive behaviours, and seeks to mitigate negative practices that impact on social, environmental, governance and economic performance (collectively referred to as the 'Four Pillars').

In particular, the social pillar sets out our expectations for our external partners to drive the most positive social impact, and mitigate negative social impacts, to provide the best

outcomes for our communities. This includes specific requirements in relation to human rights, labour rights, health and safety, inclusiveness, and supply chain diversity.

As part of our engagement with our suppliers, we require them to be familiar with our External Partner Code of Conduct so they can undertake actions that are consistent with the outlined expectations. Our contracts with suppliers typically compel them to comply with our External Partner Code of Conduct.



Extract of External Partner Code of Conduct

Human Rights

PLUS ES recognises that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings. External partners will comply with the International Bill of Human Rights and other international standards to ensure all human rights are upheld throughout their operations and supply chain. External partners will seek to identify risks, mitigate risks and eliminate any forms of modern slavery including human trafficking, involuntary servitude, forced labour, bonded labour, forced marriage or the worst forms of child labour in their operations and supply chain.

Labour Rights

External partners will comply with all applicable laws related to wages, employment conditions, working hours and legally mandated benefits. External partners will allow employees the freedom to associate, to collectively bargain and to be represented by a union.

Policies and procedures

UN SDG 8 Decent work and economic growth

We have aligned our organisation with five of the 17 UN Sustainable Development Goals (**SDGs**) that are most important to our customers and relevant to our business SDG 5 Gender equity; SDG 7 Affordable and clean energy; SDG 8 Decent work and economic growth; SDG 11 Sustainable cities and communities; and SDG 13 Climate action. SDG 8 Decent work and economic growth, addresses the health and safety of our workforce and communities, and the need to eradicate forced labour and end modern slavery.

By aligning with these SDGs, including by way of the steps set out in this Statement, we are striving to do our part to promote and contribute to the achievement of these global goals and make the world a better place.

It is our intent to further link our business activities and goals to these SDGs so we can better communicate our performance and alignment with these in future years.

Contract Templates

Each of our standard legally approved template agreements that form the basis of our contractual relationships with our suppliers, contain a requirement that the counterparty comply with any relevant domestic or foreign statutes, regulations, rules, or instruments.



FORCED LABOUR and DEBT BONDAGE

POSITION STATEMENT – MODERN SLAVERY

Overview

PLUS ES is committed to human and labour rights and the global eradication of modern slavery in all its forms. This Statement outlines our approach to addressing forced labour and debt bondage.

PLUS ES applies the *Commonwealth Modern Slavery Act 2018* definition of modern slavery, which includes forced labour and debt bondage.

Forced labour occurs when individuals are compelled against their will to provide work or service through the use of force, fraud, or coercion.

Debt bondage is where labour services are provided as a means of repayment for a loan and any of: (1) the debt is manifestly excessive; (2) the reasonable value of the services is not applied toward repaying the debt; or (3) the length and nature of the services are not respectively limited and defined.

PLUS ES supports the *UN Guiding Principles on Business and Human Rights* and these guide our response to modern slavery.

Our concerns in our supply chain

Forced labour and debt bondage is an issue of concern to PLUS ES.

We take steps to mitigate and monitor the risk that forced labour or debt bondage is used by organisations with which PLUS ES directly partners. However, we are also concerned with organisations further down our supply chain where we have less control and influence.

Our concern for forced labour and debt bondage in our supply chain is exacerbated by the economic and labour shocks attributed to the COVID -19 pandemic, climate change, and armed conflict.

PLUS ES commits to developing its capability to identify and mitigate any risks of forced labour or debt bondage in our operations and services, as well as our supply chain, and remediate this practice to the extent that doing so is within our control and influence.

Our Actions

PLUS ES publishes an annual Modern Slavery Statement that sets out our values, risk areas, actions undertaken, and how we measure effectiveness in identifying and mitigating modern slavery risks (including forced labour and debt bondage) in connection with our business and supply chain.

Ourworkforce

PLUS ES supports actions to provide: healthy, safe workplaces; the rights of association; freedom to move employment; fair and equitable pay; and not to discriminate on gender, religion, or sexual orientation.

Ourapproach

To tackle modern slavery risks, our approach is to target actions across the following areas:

- Policies and procedures that put obligations on us and our suppliers such as our Code of Conduct, Sustainable Procurement Policy and External Partner Code of Conduct
- Due diligence through regular risk-based assessment to identify our risk areas and inform our mitigation approach. We also actively engage with our suppliers, business partners, and industry peers, and investigate areas of concern.
- Continuous improvement and training to further develop our response.

PLUS ES supports five of the United Nations Sustainable Development Goals (SDGs) that best align with our business operations. One of these is UN SDG 8 – Decent Work and Economic Growth, which has a specific target for modern slavery, Target 8.7.

UN SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Our commitments

We are committed to:

- Not directly partnering with or supporting new suppliers that use forced labour or debt bondage. In the event we discover that one of our existing suppliers uses forced labour or debt bondage, to actively engage in remediation including referrals of victims to support systems, to the extent that doing so is within our control and influence.
- Taking measures to identify and mitigate the risk of forced labour and debt bondage in our business operations, and through dealings with third parties.
- Assigning appropriate governance to oversee this Statement and its implementation.
- Adhering to all relevant legislation and adopting suitable practices in accordance with relevant international labour and human rights standards to safeguard workers against forced labour and debt bondage.

Document Owner: CFO
Approved By: CEO

Page 1 of 1
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Version: 1
Approval Date: June 2022

Our latest [human rights related policy](#) addresses our concerns on Forced Labour and Debt Bondage.



Forced Labour and Debt Bondage Position Statement

As part of our commitment to human and labour rights and the global eradication of modern slavery in all its forms, PLUS ES published a Forced Labour and Debt Bondage Position Statement in FY22 to address our concerns on these issues.

This Statement outlines our concerns in our supply chain and details our actions and commitments to identify and mitigate risks of forced labour and debt bondage in our operations and services, as well as our supply chain, and remediate this practice to the extent that doing so is within our control and influence. Our intent with this Statement is to communicate to our suppliers our position on these practices, to assist in mitigating these risks. It is in response to our concern with organisations further down our supply chain where we have less control and influence.

We are committed to developing our capability to identify and mitigate any risks of forced labour or debt bondage in our operations and services, as well as our supply chain, and remediate this practice to the extent that doing so is within our control and influence.

Due diligence

Risk-based assessment

PLUS ES has conducted a risk-based assessment of its modern slavery risks to identify its higher risk, high risk and lower risk categories of goods and services it procures internationally and domestically. Our risk-based assessment reviewed the risks associated with the industries and countries from which those goods or services are procured.

To help inform our risk-based assessment, we surveyed our suppliers in our four higher risk categories of: electrical consumables, PPE and workwear, meter accessories and electricity meters and our high risk area of meter installation. The purpose of our survey was to assess:

- the improvements of our suppliers in their modern slavery processes, such as the development of a Modern Slavery Statement or applicable industry code of conduct;
- if they had experienced any modern slavery incidents in their organisation or supply chain; and
- if they or their supply chain, to their knowledge, use bonded labour (recruitment fees), Uygher labour, or source lithium from the Democratic Republic of Congo.

This information allows us to prioritise our efforts to first address higher and high risk areas and help give us greater knowledge and awareness of the actions of our suppliers.

Where appropriate, we will also take actions in respect of our lower risk areas, although it is our intent due to the size of our procurement activities to primarily focus on our higher and high risk areas in the coming year.

We will regularly review our risk-based assessment to maintain our awareness of any changes in our operations that may affect our risks.

Industry collaboration

A key element of our modern slavery approach is to engage with our suppliers to communicate our expectations and requirements.

As PLUS ES shares its procurement activities with its affiliate, Ausgrid, we adopt equivalent governance practices and use many of the same suppliers that are unique to Ausgrid. This valuable corporate arrangement and engagement within the industry has allowed the sharing of learnings to build capacity in managing modern slavery risks.

PLUS ES benefits from Ausgrid's membership of the Energy Procurement Supply Association (EPSA) for DNSPs where they have been collaborating to standardise questions on modern slavery to our common suppliers. This common approach assists in improving the shared industry understanding and management of risk areas.

Supplier engagement

Working with our industry peers does not abrogate our own responsibilities in managing this important issue. When any of our goods or services are procured via a tendering process, we require the tendering organisation to complete a modern slavery survey to assist us in assessing their eligibility.

Modern slavery is a complex issue and we wish to encourage honest reporting by our supply chain partners. If modern slavery is identified in our external partner's business or supply chain, our approach is to encourage efforts for them to have this addressed before any other action is taken by us. Where modern slavery is in their supply chain, we ask that they work with their subcontractors and suppliers to rectify the issue and retain employment for those affected.

With modern slavery recognised as being endemic in the lower parts of supply chains, we wish to encourage open dialogue about its existence and efforts to change behaviour for the better, rather than create an environment where information may be withheld.

Through our surveys, External Partner Code of Conduct, Sustainable Procurement Policy,

and our alignment with UN SDG 8 – Decent work and economic growth, we are sending clear signals on how we believe our external partners and employees should ethically conduct their business.

CASE STUDY

Introducing new subcontractors

To ensure security of supply of goods during COVID-19, suppliers onboarded additional subcontractors to provide raw materials.

PLUS ES worked closely with its suppliers to ensure subcontractors adhered to Modern Slavery requirements. As part of the approval process, documentation was requested demonstrating alignment to PLUS ES's External Partner Code of Conduct and policies relating to Modern Slavery.

Continuous improvement and training

We are committed to continuous improvement in all areas of our business including our modern slavery response. In FY22 we continued our improvements through the following actions:

- developing and publishing our Position Statement on Forced Labour and Debt Bondage, to highlight our concern and awareness on this practice and outline our efforts to mitigate this risk;
- engaged third party expertise to assist with the completion and analysis of supplier risk assessment questionnaires;
- rolling out our internal online training for modern slavery to the Executive Leadership Team, senior managers and all contract managers in the business;
- commencing discussions with strategic suppliers to understand what activities they are carrying out to meet modern slavery obligations; and
- developing a three-year modern slavery improvement roadmap.

Our Modern Slavery Roadmap

This year we partnered with KPMG Banarra, specialists in human rights and social impact management, to develop a three-year roadmap and implementation plan to improve our maturity in relation to modern slavery risk management.

Improvement actions were developed across five areas of focus as set out below:

1. Human rights and related policies

- Develop and implement a Human Rights Policy, risk appetite framework and leadership ambition
- Update related policies, procedures and training on a regular review cycle

2. Risk assessment and monitoring

- Enhance risk identification and assessment processes, including undertaking third party audits on operations and supply chains
- Develop and adopt a standard template for supplier performance improvement plans

3. Accountabilities and capabilities

- Review performance of relevant employees in relation to their accountabilities and responsibilities for modern slavery risk management
- Provide regular training to improve general awareness of modern slavery
- Review training assessments to determine if training is meeting outcomes
- Communicate updates to key policies and risk management processes to key contracted suppliers

- Engage with suppliers based on the outcomes of the updated risk assessment process
- Review outcomes of performance improvement plans

4. Communication and collaboration

- Develop internal reporting templates
- Provide tailored communication to employees
- Review internal reporting process to ensure efficacy in meeting stakeholders information needs
- Incorporate modern slavery management process into modern slavery statements and sustainability reporting
- Benchmark external reporting against industry best practice
- Maintain membership and share learnings with industry associations
- Collaborate to develop solutions to sector-wide issues

5. Grievance and remediation

- Develop and implement grievance response guidelines
- Review efficacy of grievance mechanisms and remediation by identifying and engaging with impacted stakeholders.



Online training

Our focus with training is to raise awareness and understanding and translate this into actions that our employees can take.

We made sure we used case studies of examples of modern slavery in Australia to highlight that it can occur in any country. Our training covers: human rights issue of modern slavery; supply chains in businesses and how they can contribute to eliminating modern slavery; modern slavery issues for our business; how it applies at PLUS ES; and our employee obligations and responsibilities.

Measuring effectiveness and other information

Measuring effectiveness

We are committed to continuous improvement and measuring the effectiveness of our risk mitigation actions.

We measure the effectiveness of our modern slavery response based on the following:

- the quality of the responses we receive from our external partners on how they are managing modern slavery;
- the number of reported incidents;
- self-reporting from our external partners of an identified or suspect modern slavery issue; and
- the quality of such reporting.

Actions that we plan to commence to measure effectiveness include:

- at least annually, reviewing the actions we have taken to check their effectiveness;
- reviewing our existing higher risk suppliers to ascertain if any circumstances have changed; and
- measure our progress against our three-year Modern Slavery Roadmap.

Other consultation

PLUS ES consulted with members of Ausgrid’s Procurement team in the preparation of this Statement.

Other information about this Statement

For the purposes of the Act and this Statement, modern slavery means conduct which would constitute:

- (a) an offence under Division 270 or 271 of the Criminal Code; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Procurement Community of Practice

PLUS ES, in conjunction with its affiliate Ausgrid, has developed a Procurement Community of Practice (**PCoP**) group. The PCoP consists of Executive General Managers, Heads of Procurement, the Sustainability Manager and Procurement Leaders. The PCoP, amongst other responsibilities, review and manage organisational impacts and risks as they relate to Procurement, including modern slavery risks.



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