



Modern Slavery

Statement

Joint Statement

Hydro Tasmania
Entura
Momentum Energy
AETV

FY2022/23

Chairman's message

Hydro Tasmania is a values-driven organisation that puts people at the heart of everything we do. That means our staff, our customers, and our communities. It also means the people at each link of our supply chains.

We may be headquartered in Tasmania, but our supply chains are complex and far reaching. We interact with other companies and countries across the globe, as we generate and sell energy, and provide expert consulting services.

We have a responsibility to ensure the highest standards of fairness and ethical conduct are not just observed within our own business, but the businesses that supply and service our work.

According to the Walk Free Foundation, there are an estimated 49.6 million victims of modern slavery globally, and \$US468 billion worth of at-risk goods were imported by G20 countries. We take our responsibility to these people very seriously.

We will continue to raise our understanding of the issues; train our staff to identify and minimise risks; and improve the processes through which we engage with other businesses. And we will continue to operate according to the high standards of corporate integrity that are expected of Australia's largest generator of renewable energy.

Hydro Tasmania's board is proud to endorse this statement.

Approval: This statement for Hydro-Electric Corporation was approved by the Board of Hydro-Electric Corporation on 8 December 2023.

This statement for AETV Pty Ltd and Momentum Energy Pty Ltd was approved by the Board of Hydro-Electric Corporation on 8 December 2023, as the parent entity of both of those wholly owned subsidiaries.

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Helen Galloway

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15 December 2023 | 9:00 AM AEDT

Date

*Signed by Helen Galloway
Acting Chair - Hydro-Electric Corporation*

Introduction

The term *modern slavery* is used to describe situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them from their freedom. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.

This document satisfies Hydro Tasmania's reporting requirements under s14 of the *Modern Slavery Act 2018* (Cth). It provides an overview of Hydro Tasmania's approach to modern slavery, and the risks associated with its operations and supply chain for the financial year FY2022/23.

Who we are

Hydro-Electric Corporation, trading as Hydro Tasmania, is a corporation established under the *Hydro-Electric Corporation Act 1995* (Tas), a government business enterprise under the *Government Business Enterprises Act 1995* (Tas) and is registered with ASIC as a registered Australian Body (ARBN 072 377 148).

Hydro Tasmania, AETV Pty Ltd (AETV) and Momentum Energy Pty Ltd (Momentum Energy) are each deemed reporting entities under the *Modern Slavery Act 2018* (Cth) and are included in this joint statement. In addition, Hydro Tasmania's power, water and renewable energy consulting arm, Entura is included in this joint statement.

The reporting entities are referred to collectively in this statement as 'the Hydro Tasmania group'.

As the directors of AETV and Momentum Energy are also senior executives of Hydro Tasmania, a single executive team has ultimate management responsibility for all four entities covered in this statement. Likewise, the Board of Hydro Tasmania has oversight over the entirety of the Hydro Tasmania group.

For the purposes of this statement, the Hydro Tasmania group includes:

- Hydro-Electric Corporation (trading as Hydro Tasmania)
- Entura, a division of Hydro-Electric Corporation
- Momentum Energy Pty Ltd
- AETV Pty Ltd.

Other wholly owned and controlled subsidiaries of Hydro-Electric Corporation not covered by this statement are:

- Bell Bay Power Pty Ltd
- Bell Bay Three Pty Ltd
- Cathedral Rocks Construction and Management Pty Ltd
- Entura Hydro Tasmania India Pvt Ltd
- Heemskirk Holdings Pty Ltd
- Heemskirk Wind Farm Pty Ltd
- HT Wind Developments Pty Ltd
- Hydro Tasmania Retail Pty Ltd
- HT Wind Operations Pty Ltd
- Hydro Tasmania Consulting (Holding) Pty Ltd
- Hydro Tasmania Neusberg Pty Ltd
- Hydro Tasmania South Africa (Pty Ltd)
- Lofty Ranges Power Pty Ltd
- RE Storage Project Holding Pty Ltd
- Woolnorth Bluff Point Holdings Pty Ltd
- Woolnorth Studland Bay Holdings Pty Ltd.



Preparation

The Hydro Tasmania group is a large employer in Tasmania, and between our reporting entities we have staff working in a broad range of disciplines including; engineering, scientific, project management, strategic planning, IT, financial, human resources, marketing, operational, corporate governance, retail call centre and administrative staff.

To prepare this joint statement, Hydro Tasmania's Modern Slavery Working Group engaged with and consulted each of the reporting entities covered by this statement and consulted the entities we own or control, to discuss specific suppliers and supply chain purchasing during the reporting period FY2022/23.

The Modern Slavery Statement is informed by Hydro Tasmania group's Code of Conduct, which recognises our obligation to comply with all legislation. In addition, our Sustainability Principles, Work Health and Safety Policy and Environmental Policy all work together to define the standard of ethical behaviour required across the business. They are supported by other internal procedures related to whistleblowing, fraud, corruption and risk management.

Our operations and supply chains

Hydro Tasmania is Australia's leading clean energy business and largest generator of renewable energy. The Hydro Tasmania group is made up of the four core businesses with 1286 employees.

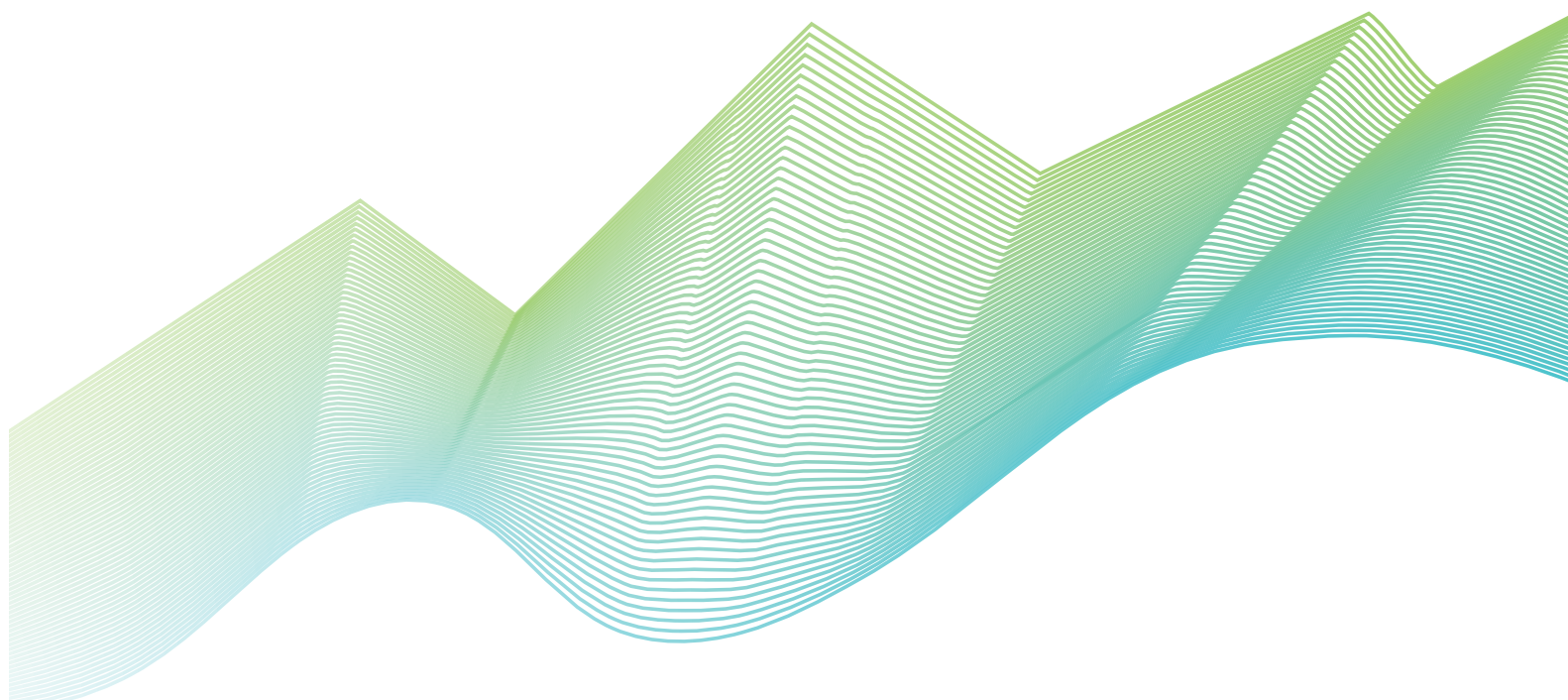
High-level summaries of business activities undertaken by each of these four entities are as follows. Except as noted, all employee figures are as of 30 June 2023.

- Hydro Tasmania (not including Entura) has 722 employees and is primarily involved in the generation of hydropower in Tasmania, and the trading of electricity and energy-related environmental products (such as renewable energy certificates) in Australia's National Electricity Market. Hydro Tasmania owns and manages 54 major dams and 30 operating hydropower stations and supplies electricity to two Bass Strait islands via hybrid power plants that combine diesel, solar and wind power generation. Hydro Tasmania is also engaged in a range of projects as part of its *Battery of the Nation* initiative. Most Hydro Tasmania employees work either at power stations across the state or at the head office in Hobart.
- Entura provides consultancy services nationally and internationally for renewable energy development, engineering, hydropower, water infrastructure, water







management, project management, environmental management and other relevant disciplines. Entura employs 210 technical professionals and administrative staff, including 28 employees based in its India office in New Delhi. A minority of consultants are situated in the Hydro Tasmania group's Melbourne and Adelaide offices.

- Momentum Energy is principally engaged in marketing and retailing energy and energy-related products and services to residential and business customers on mainland Australia (excluding Western Australia and Northern Territory) and the Bass Strait islands. Staff are mainly based in Tasmania and Victoria (Melbourne). Momentum Energy employs 332 personnel.
- AETV operates a gas generation power station in the Tamar Valley in northern Tasmania. The station was commissioned in 2009. It provides both base load and peaking generation via combined and open-cycle gas turbines. AETV employs 22 personnel.

All four businesses comprising the Hydro Tasmania group follow the same procurement policy and procedures via a single supply chain function called Business Services in Hobart, Tasmania. The Entura Indian office is an exception and conducts its own procurement according to its ISO9001-certified sourcing procedure aligned with the Hydro Tasmania group's processes.



Hydro Tasmania group operations and supply chains

Hydro Tasmania	Generation asset maintenance, upgrades and repairs 	<ul style="list-style-type: none"> • Operation and maintenance of generation equipment, including machinery in power stations and water conveyancing infrastructure • Feasibility studies for pumped hydro • Progressing works associated with Battery of the Nation • Land care, waterway, and flora and fauna conservation • Testing and monitoring equipment • Electrical distribution on the Bass Strait islands • Equipment hire
	Energy generation 	<ul style="list-style-type: none"> • Hydro generation plant and equipment consumables • Diesel (Bass Strait islands) • Industrial consumables • Gas (AETV) • Wholesale energy trading
Hydro Tasmania	Corporate services 	<ul style="list-style-type: none"> • Personal protective clothing and equipment (PPE) • Legal services • Marketing and advertising • Office services and improvements, including cleaners and facility repair work • Office and asset-based labour hire • Travel, fleet purchases and maintenance • Freight and logistics • Security services • Stationery and office consumables
	Information technology 	<ul style="list-style-type: none"> • Hardware • Software and licensing • Consulting services including architecture and security • Telecommunication
Entura	Consulting 	<ul style="list-style-type: none"> • Professional and technical services throughout Australia and overseas
Momentum Energy	Retail customer service 	<ul style="list-style-type: none"> • Customer research services • Debt collection services • Bill printing and issuing • Call centre software to manage workflow and customer accounts

Modern slavery risk overview

The Hydro Tasmania group's supply chain is broad. Consequently, the business's exposure to modern slavery risks is diverse. Modern slavery has the potential to be present in: Hydro Tasmania sources good from 3 of the top 5 at risk industries as identified from the 2023 Walk Free Global Slavery Index being electronics, garments and solar panels.

Modern slavery has the potential to be present in:

- Entura's subcontractor supply chains delivering goods and services overseas, particularly in countries considered high-risk in the Global Slavery Index;
- procurement and sourcing of solar panels;
- the procurement of corporate clothing and personal protection clothing and equipment;

- the sourcing of equipment, machinery, consumables and materials from overseas, particularly for energy generation where European suppliers may procure supplies from high-risk countries. This risk may increase as Hydro Tasmania embarks on planned large scale infrastructure projects;
- labour-hire sourcing within Australia (no labour hire occurs overseas); and
- IT hardware and software procurement.

Entura has a consulting office based in New Delhi. Apart from some smaller IT procurement, PPE, office consumables and office cleaning services, most suppliers to Entura's India office are technical and professional service providers, who present a lower modern slavery risk compared to other occupational and industry categories.

Identifying and responding to modern slavery

During the reporting period, Hydro Tasmania continued to focus on improving our approach to identifying and responding to modern slavery risks. Key areas of work were:

Hydro Tasmania Modern Slavery Working Group

To support identifying and responding to modern slavery risks, Hydro Tasmania's Modern Slavery Working Group continued to meet. This group has been operating for three years and meets regularly to improve process, keep abreast of industry modern slavery risks, report to management on risks and progress, and prepare the Modern Slavery Statement.

Modern Slavery Training for employees

In the reporting period Hydro Tasmania rolled out compulsory Modern Slavery awareness training to all staff and included the training as part of new employee induction processes. At the end of the reporting period 1202 people had completed the training.

Within Entura, Integrity Framework training, which includes modern slavery aspects, was completed for new starters.

Policy Development

Hydro Tasmania endorsed a new Procurement Policy in February 2023. This policy includes a commitment to

combat modern slavery in our supply chain by working with our suppliers, responding to modern slavery risks and committing to continual improvement.

Along with this Hydro Tasmania also signed the Clean Energy Council's *Pledge Against Modern Slavery* alongside other members of the renewable energy industry.

Procurement of Solar Panels

Over the last 12 months Hydro Tasmania has installed over 500 solar panels to help reduce carbon emissions from diesel generation. Part of the tender process for this procurement was requesting tenderers provide a statement addressing the *Modern Slavery Act* (2018) as part of the assessment process. This was supported by a desktop due diligence of the top two preferred tenderers before contract signing.

Identification and review of suppliers

Hydro Tasmania continues to engage with sustainability and supply chain consultants 'Informed 365' to assist in preliminary risk assessment, and to conduct future surveys and investigations of the Hydro Tasmania group's supply chains. Informed 365's IT platform is used by other prominent members of the international energy industry through the Energy Procurement Supply Association (EPSA Consortium). The Informed 365 platform continues to be used by Business Services to manage supplier surveys and risk identification.

To identify modern slavery risks Hydro Tasmania initially identified a range of suppliers of goods and services for a targeted review. Suppliers included were:

- all Australian-based suppliers or providers of goods and services of AU\$1 million or more;
- all overseas suppliers with which the Hydro Tasmania group spent AU\$1 million or more, excluding sole-trading professional consultants; and
- any overseas supplier located in or that delivered services or goods from countries that have a high rating on the Global Slavery Index.

Contract clauses

Hydro Tasmania group continues to include modern slavery clauses in its procurement contract templates to ensure suppliers do not engage in modern slavery and that modern slavery laws are complied with.

Supplier Code of Conduct

In the previous reporting period, Hydro Tasmania committed to commence developing a Supplier Code of Conduct. Initial work commenced in 2022 to determine scope and approach. Further work will be conducted during the next reporting period.

Large Scale Infrastructure Projects

Hydro Tasmania is currently working on a number of large scale infrastructure projects, including Battery of the Nation and upgrades of West Coast hydropower stations. During the reporting period, work on environmental, social and governance requirements was conducted for Battery of the Nation, including planning for modern slavery due diligence requirements as a part of any future procurement process. Sustainability screening was also conducted as a part of due diligence on three major potential turbine manufacturers for the main inlet valve replacement project to evaluate risks, including modern slavery.

Entura's Integrity Framework and sustainability screening process

Entura's approach to modern slavery is defined by Entura's Integrity Framework and is guided by the Hydro Tasmania group's Code of Conduct, Sustainability Principles, Work Health and Safety Policy, and Environmental Policy. Entura's commitment to these policies is outlined in its publicly available Integrity Commitment Statement.

The Integrity Framework is part of Entura's ISO9001-certified quality management system. This framework supports sustainable and ethical decisions when considering the countries and contexts where Entura works, what projects Entura works on and with whom they choose to partner. Modern slavery commitments are incorporated into the Integrity Framework and are guided by the *United Nation's Guiding Principles on Business and Human Rights*.

Integrity Framework requires the following when working with suppliers, partners and sub-consultants:

- considering the supply chains of partners, subcontractors and suppliers, and the likelihood of whether supply chains may involve human rights issues associated with forced, compulsory, trafficked or child labour
- undertaking sustainability screening prior to the engagement of all new partners, subcontractors and suppliers with more than 10 employees
- providing clients, suppliers and subcontractors access to the Integrity Commitment Statement to ensure they understand and comply with commitments
- proactively raising concerns about issues that Entura employees see in the behaviour of suppliers, partners and sub-consultants
- where issues are identified and validated, updating and re-evaluating the relevant sustainability screening.

During the reporting period, 130 sustainability screenings were conducted of potential clients and/or projects. For more details of Entura's Integrity Framework see www.entura.com.au/about/enturas-integrity-management.

During the reporting period, Entura also supported clients to understand modern slavery risks associated with the renewables industry and how to manage this risk through due diligence and procurement.

Collaboration with industry

During the reporting period, Hydro Tasmania continued to collaborate with industry, including membership of the EPSA Consortium across the energy industry and the Clean Energy Council Risks of Modern Slavery Working Group. We will continue to be involved in group forums to support review of legislation, share knowledge and improve business practice.

Additionally, through the EPSA consortium and the Clean Energy Council, Hydro Tasmania participated in discussions and submissions to the review of the *Modern Slavery Act 2018* (Cth).

Responding to modern slavery

If modern slavery is identified as part of supplier investigations or other means such as public interest disclosure, the Hydro Tasmania group will respond by taking all appropriate actions in accordance with the guidance provided by the Australian Government's *Guidance for Reporting Entities*. This guidance includes not trying to resolve the situation independently to the potential detriment of victims, and to consider ending a supplier relationship only if the supplier refuses to address modern slavery and there is no real prospect of change. In most instances, we will collaborate with reputable international and local organisations that can provide pragmatic assistance appropriate to each location and cultural context.

Assessing the effectiveness of Modern Slavery actions and future improvements

The Hydro Tasmania group is committed to identifying and responding to modern slavery risks as an exercise of continual improvement. Our risk assessment of suppliers, based on location, industry and expenditure, provides a solid footing for further investigation, review and improvement.

Hydro Tasmania will continue to work on management approaches to combat modern slavery in our supply chains. This involves the following:

Key areas of action in 2023-24 and beyond

Timeframe	Area of action
2023-24	Implement due diligence measures to screen for supplier modern slavery risks during procurement processes.
	Finalise the update of the Sourcing and Contracts procedures to ensure modern slavery risks are considered and managed.
	Continue to collaborate with key industry groups, including the Clean Energy Council and the EPSA consortium, to support a collaborative approach to reduce modern slavery risks.
	Develop a Supplier Code of Conduct that will incorporate specific modern slavery provisions and expectations for Hydro suppliers.
	Continuously improve Entura's Integrity Framework and sustainability screening process, including continual assessment of modern slavery risks associated with the renewable energy industry.
	The Modern Slavery Working Group will continue to focus on modern slavery risk effectiveness through its reporting on milestone achievements to the Executive during FY2023-24.



