



Modern Slavery Statement

2024/2025



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OUTLINED IN THE MODERN SLAVERY ACT 2018 (CTH),
S16(1)22**

Message from the Board

Modern slavery is an ongoing global challenge affecting millions of people around the world, including in Australia.

Powerlink remains committed to working collaboratively with our suppliers and industry peers to reduce the risk of modern slavery within our business operations and supply chains.

In the financial year 2024/25, we enhanced our response to modern slavery by implementing a Modern Slavery Strategy, refreshing policies and frameworks, updating training and resources and advancing our approach to supply chain risk assessment.

This Statement outlines our commitment in practice, to identify, assess and address the risk of modern slavery in our business, as well as our continued efforts to raise awareness of modern slavery.

The Powerlink Board as the principal governing body has formally endorsed this Statement and verify it to be true and correct. As per the requirement of the Act, a Director on the Board has approved the submission of this Statement for the period 1 July 2024 to 30 June 2025.



Craig Doyle
Chair



This Modern Slavery Statement (Statement) has been developed by Queensland Electricity Transmission Corporation Limited, ABN 82 078 849 233, trading as Powerlink Queensland (Powerlink) in accordance with the requirements of the *Commonwealth Modern Slavery Act 2018* and in alignment with the *United Nations Guiding Principles on Business and Human Rights*. This Statement demonstrates the actions taken to assess and address modern slavery risks within Powerlink’s operations and supply chains for the reporting period July 2024 to June 2025. As the majority shareholder of Queensland Capacity Network Pty Ltd ABN 75 633 081 517 trading as QCN, this Statement produced by Powerlink includes the activities of the subsidiary QCN.

Powerlink acknowledges the Traditional Owners and their custodianship of the lands and waters of Queensland and in particular, the lands on which we operate. We pay our respects to their ancestors, Elders and knowledge holders and recognise their deep history and ongoing connection to Country.



About this Statement

Modern slavery is an ongoing global challenge affecting millions of people around the world, including in Australia. At Powerlink Queensland, we are dedicated to enhancing our awareness of modern slavery risks and establishing robust controls to proactively prevent and manage potential risks within our supply chains and operations.

This is Powerlink's sixth annual Statement since the implementation of Australia's *Modern Slavery Act 2018*. It details how we apply our commitment in practice to identify, assess and manage modern slavery risks through measures that keep our people informed and accountable.

During the financial year 2024/25, we took considered action to address modern slavery risks through several targeted initiatives including:

- Introducing a Modern Slavery Strategy to strengthen our response and prevention efforts;
- Upgrading training programs and frameworks to better equip staff in identifying and responding to modern slavery risks;
- Enhancing procurement processes by integrating modern slavery considerations into each stage of supplier engagement;
- Fostering closer collaboration with industry partners to share expertise and refine our risk management approach; and
- Implementing ongoing enhancements to operational procedures to efficiently address and manage modern slavery risks throughout our organisation and supply chains.

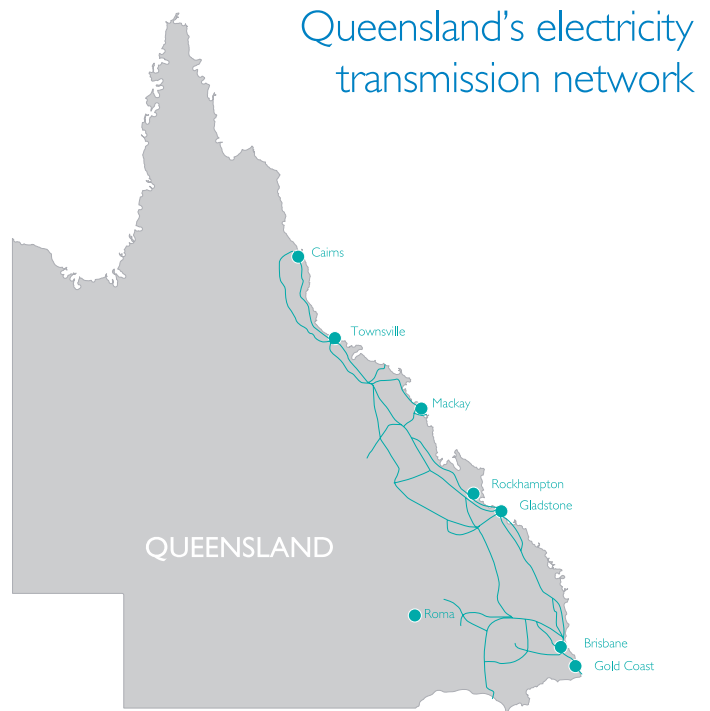
We remain committed to human rights and the prevention of modern slavery, upholding transparency and accountability in all areas of our business activities and ensuring we maintain a working environment where people feel safe and respected.

Our business

Powerlink is a leading Australian provider of high voltage electricity transmission network services, combining innovation with insight to deliver safe, cost effective and reliable solutions.

We are a Government Owned Corporation (GOC) that owns, develops, operates and maintains the high voltage electricity transmission network in Queensland. Our transmission network extends 1,700 kilometres (km) from Cairns to the New South Wales border and comprises 15,559 circuit km of transmission lines and 154 substations.

Our purpose is to **connect Queenslanders to a world-class energy future**, providing electricity to more than five million Queenslanders and 241,000 businesses.



People

Powerlink employs approximately 1,996 workers, 1,837 of which are permanent employees. The remaining 159 workers are non-permanent employees and/or labour hire engaged in non-permanent roles. Many of our employees live and work locally in the communities where we operate.

Powerlink has a clearly understood and articulated Industrial Relations Strategy, consistently applied by our leaders that focuses on:

- relationship management;
- constructive workplace culture; and
- a safe, engaged, skilled workforce.



Operations

As a Transmission Network Service Provider (TNSP), we link to the National Electricity Market (NEM) via the Queensland to New South Wales Interconnector (QNI) transmission line. Most of Powerlink's network is regulated by the Australian Energy Regulator (AER) under the National Electricity Law and the National Electricity Rules (NER).

As well as connecting large generators to end-use customers through the distribution networks owned by [Energex](#) and [Ergon Energy](#) (part of the Energy Queensland Group) and [Essential Energy](#) (in northern New South Wales), we also directly provide electricity to large industrial customers such as rail companies, mines and mineral processing facilities.

Powerlink's network serves as the platform for the provision of energy services while maintaining a sharp focus on safety, affordability and reliability of supply for our customers.

WHAT IS ELECTRICITY TRANSMISSION?

GENERATION / STORAGE

Generate or store electricity



TRANSMISSION NETWORK

Transports electricity over long distance

Substation
Converts electricity
to higher voltage

Substation
Converts electricity
to lower voltage

DISTRIBUTION

Transports electricity to its final destination

Large industrial

Homes and businesses

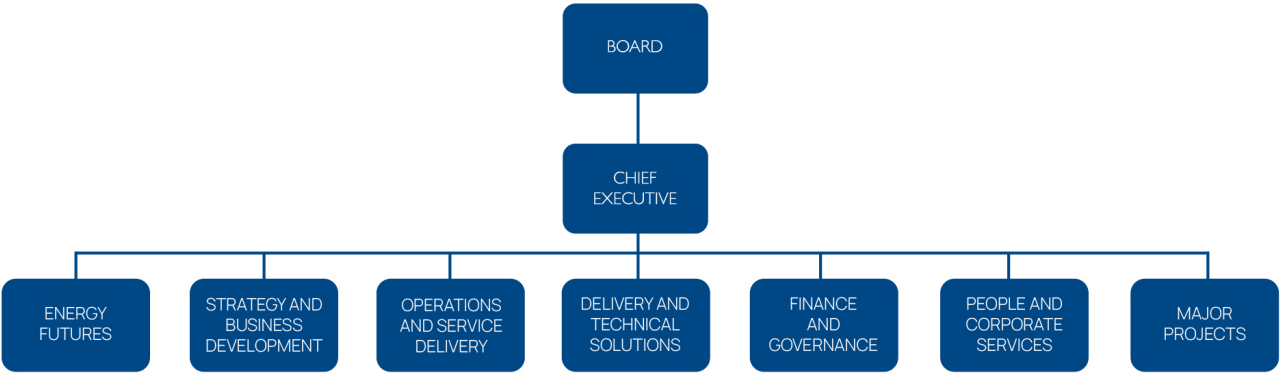


Business structure

The Powerlink Board and Executive Team establish the overall corporate governance of Powerlink, as well as the strategic direction, policies and operational framework. The Board and management work together to establish and maintain a legal and ethical environment and framework that ensures accountability throughout Powerlink that is in the best interests of shareholders and the corporation.

Powerlink is structured into seven distinct business divisions¹, collectively assigned with the responsibility of providing end-to-end delivery of Powerlink’s key services:

- transmitting electricity from generators to distributors/customers;
- network operations, asset management, and asset maintenance; and
- installing and maintaining new network infrastructure.



¹As at 30 June 2025

Powerlink's subsidiaries

Queensland Capacity Network (QCN)

Powerlink is a majority shareholder of Queensland Capacity Network Pty Ltd (QCN), a telecommunications company, jointly owned by Powerlink and Energy Queensland. Its mission is to improve telecommunications connectivity across the whole of Queensland, through leveraging spare capacity on the government-owned fibre network and access to infrastructure to host telecommunications equipment.

QCN is a totally carrier diverse and geographically diverse fibre network spanning more than 13,000km stretching from the Gold Coast, west from Brisbane to Toowoomba and beyond, and north through regional townships up to Cairns.

With infrastructure of over 20,000 high voltage and telecommunications towers, QCN's extensive coverage offers improved wireless connectivity and coverage via high-capacity wholesale backhaul services to telecommunication service providers. This allows for the transmission of large volumes of voice, data, and video traffic.



Other subsidiaries

The following Powerlink subsidiaries were dormant or non-operational during the reporting period:

- CopperString 2.0 Electricity Transmission Corporation
- Powerlink Transmission Services Pty Ltd
- Harold Street Holdings Pty Ltd

Policy resources in relation to modern slavery

Powerlink has measures in place to identify and reduce the risk of modern slavery in its business operations and supply chains.

Code of Conduct

Powerlink's Code of Conduct (the Code) brings to life our values, culture, and commitment to our customers and the community. It sets out the standard of behaviour which is expected at Powerlink, to enable workers to deliver against Powerlink's Purpose and Values.

The Code also supports Powerlink's commitment to:

- accountability and transparency; and
- a diverse, inclusive workforce and working environment for our employees and other workers.

Induction training is undertaken by our workers at the commencement of employment which includes training on the Code. All Powerlink workers are required to undertake refresher awareness training on the Code at least every two years. Powerlink leaders are responsible for ensuring that their teams understand the Code requirements and that leaders are reinforcing the requirements of the Code.

Supplier Code of Conduct

Powerlink's [Supplier Code of Conduct](#) contains expectations of suppliers to act against human rights abuses in the supply chains and commit to high ethical standards.

Modern Slavery Policy

Powerlink has a Modern Slavery Policy (the Policy) committing to identifying and eliminating the risk of modern slavery, which applies to all employees, suppliers and contractors engaged by Powerlink.

The Policy defines the prevention, detection and reporting of modern slavery in any part of Powerlink's operations or supply chains as the responsibility of all those working for or engaged by Powerlink.

Where appropriate, and with the welfare and safety of workers as a priority, Powerlink gives support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own operations and supply chains.

If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains contravenes the Policy, staff are encouraged to raise it with their manager. Alternatively, they may choose to access the whistleblower hotline with any concerns.

Powerlink has internally published process maps providing guidance to employees for the procedures to follow for each of the following activities: End-to-end process for Managing Modern Slavery, Modern Slavery Incident and Customer Survey Response and Modern Slavery Supply Chain Risk Assessment.

Our supply chain

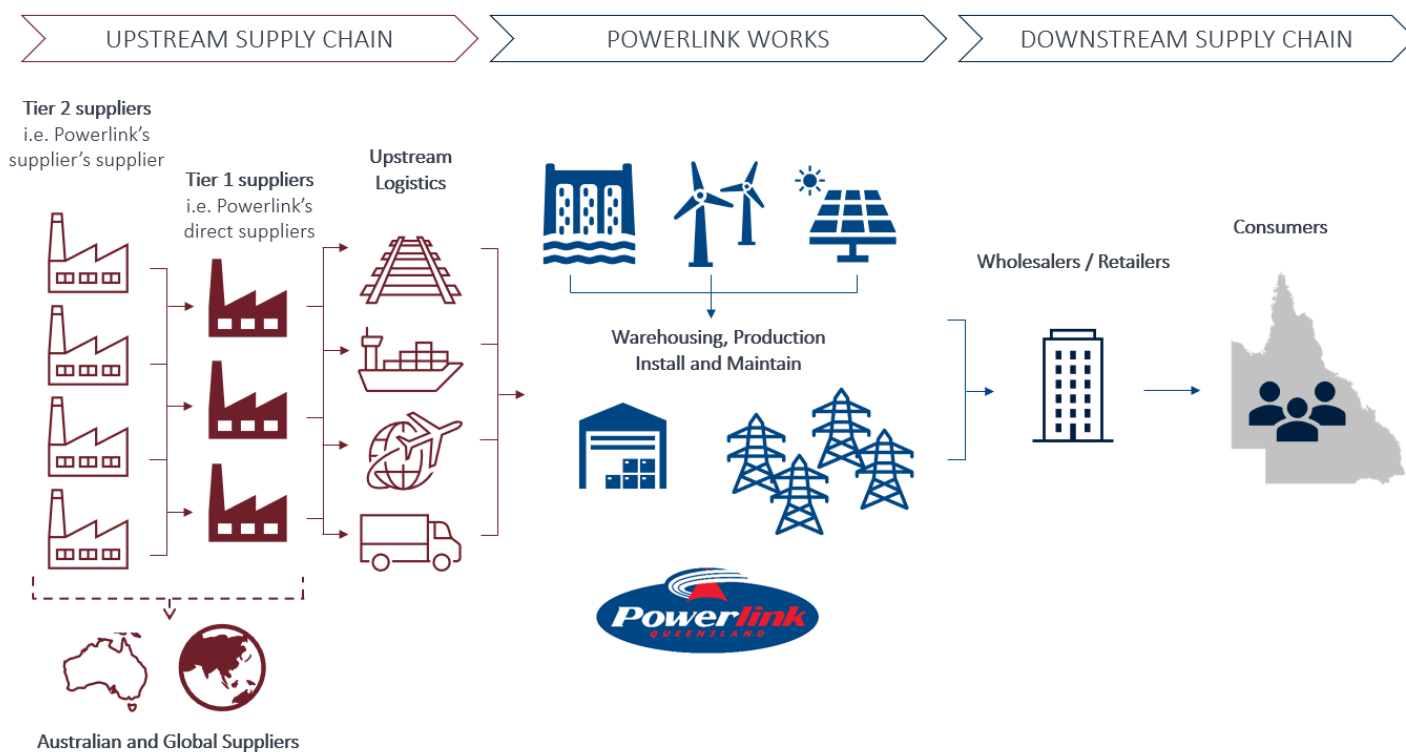
Powerlink's business activities across Queensland are delivered directly by Powerlink without the use of agencies, distributors or franchising.

Powerlink procures goods and services required to meet the needs of the end-to-end high voltage transmission lifecycle. In delivering these procurement activities, Powerlink supports the principles of the Queensland Procurement Policy to maximise the benefits that can be delivered through ethically, environmentally and socially responsible procurement. Powerlink requires its suppliers to comply with the Powerlink [Supplier Code of Conduct](#).

The upstream portion of Powerlink's supply chain includes direct goods and services transactions with Tier 1 suppliers and the processes for managing those relationships.

The Powerlink works portion consists of the operational maintenance and construction activities required to transmit electricity from power generators to customers.

The downstream portion consists of the electricity distributors and retailers managing the direct linkage to end-use customers.



Powerlink maintains robust industrial relations throughout its operations, regularly engaging relevant unions as part of applicable sourcing activities.

Financial year 2024/25 spend

During the 2024/25 reporting period, Powerlink engaged with 1,972 suppliers directly across seven product categories:

- Fleet and Logistics
- Indirect Goods and Services
- Network Maintenance
- Information and Communication Technology (ICT)
- Professional Services
- Network Materials
- Network Construction

Expenditure was highest in the Network Construction category.

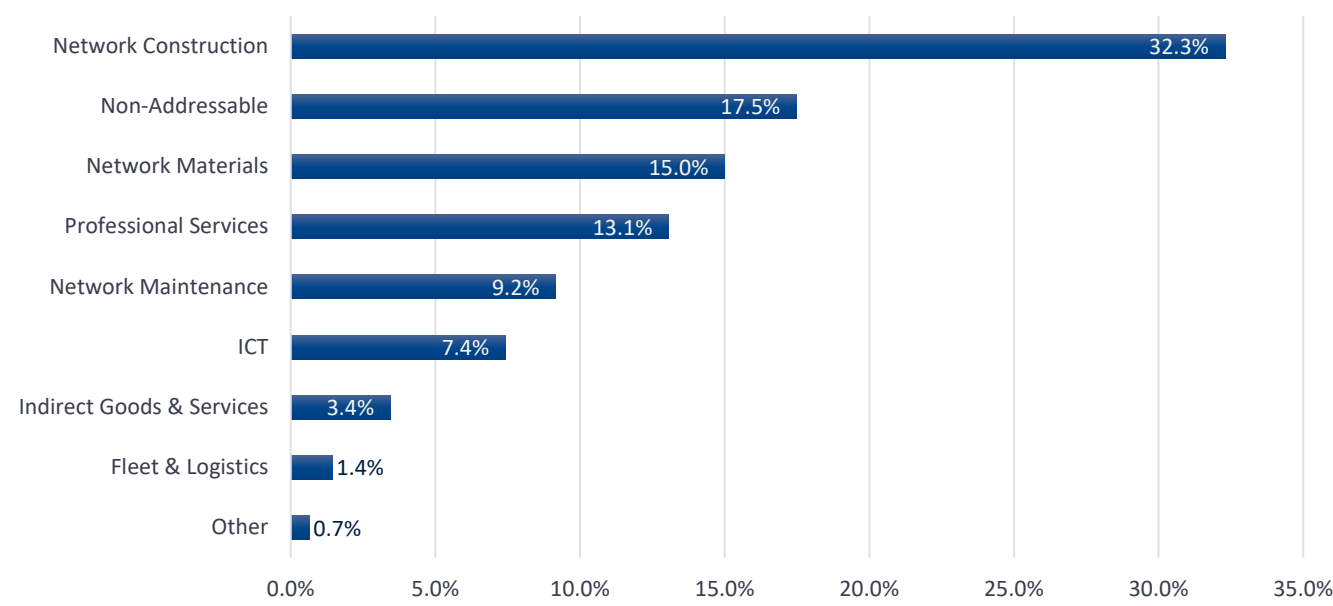


Figure 1 Spend percentage in FY2024/25 by category.

FY2024/25 spend and suppliers by geographic location

Powerlink procured goods and services from 15 countries in FY2024/25². Almost **99 percent** of Powerlink's FY2024/25 spend was procured through Tier 1 suppliers located within Australia, however goods may have some or all components manufactured globally. The remaining **1 percent** of Powerlink's FY2024/25 spend was procured through Tier 1 suppliers located globally. Of the Australian suppliers, **75 percent** were based in Queensland.

The below map shows FY2024/25 invoiced spend by geographic location of suppliers, as a percentage.

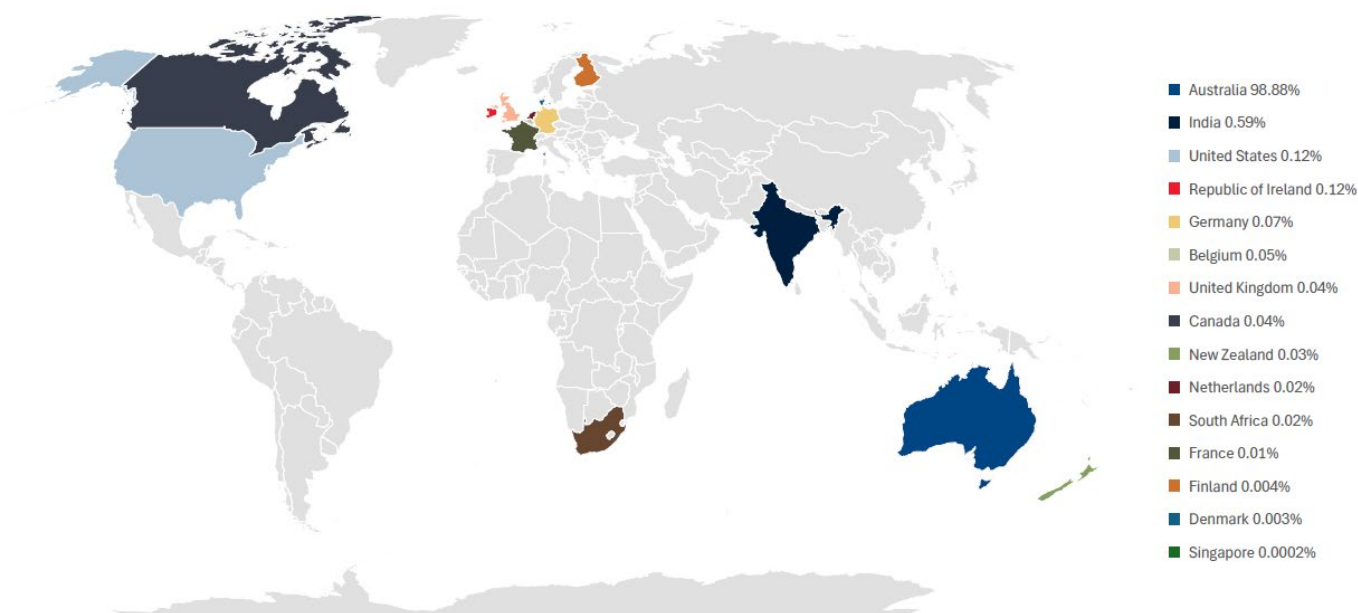


Figure 2 Spend percentages by geographic location of supplier, based on FY2024/25 invoiced spend only.

Although Australia is generally considered a low-risk country with respect to modern slavery, we recognise the importance of remaining vigilant as instances of modern slavery can still occur domestically. Additionally, the geographic location of our suppliers may not always reflect the actual country of origin for the goods and/or services provided.

² A Powerlink supplier's location is based on the country of location listed against their ERP SAP vendor record.

Modern slavery risks

Powerlink evaluates its exposure to modern slavery by assessing both the risks present within our internal operations and those associated with our supply chains.

In our internal operations

The risk of modern slavery in Powerlink's internal operations is managed by the Corporate Services division through the implementation of policies and procedures reflecting legislative and regulatory requirements.

Powerlink ensures that all employees are afforded working conditions meeting or exceeding legislative requirements through Fair Work Commission approved, Enterprise Agreements. The Enterprise Agreements in place at Powerlink throughout the reporting period were the Powerlink Managers Agreement 2024 and the Working at Powerlink Union Collective Agreement 2024 (WAPA).

Powerlink engages contractors and labour hire workers when necessary. The risk of modern slavery in these engagements is mitigated using compliant suppliers engaged under a supplier panel, with strict industrial relations terms and conditions applied.

Powerlink has several policies and procedures designed to protect the rights of staff. These include an Employee Code of Conduct, Employee Complaints Procedure and Complaints Management Framework (including an external integrity/whistleblowing hotline).

In our supply chain

External impacts

During the FY2024/25 reporting period, Powerlink's supply chain was affected by several external factors:

- Geopolitical instability and shifting trade policies disrupted access to critical components and materials, particularly from high-risk regions.
- Weather-related events such as floods and heatwaves impacted logistics and supplier operations, increasing lead times and delivery uncertainty.
- Global inflation and cost volatility continued to drive up prices for equipment, materials, and freight.
- The global boom in renewable energy infrastructure intensified competition for transmission components and construction services.
- Suppliers showed reluctance to commit to long-term pricing arrangements and sought reviews of existing commercial terms.

Powerlink continues to adopt a flexible and collaborative approach with suppliers, maintaining open dialogue to avoid undue pressure and mitigate risk. We continue to monitor global trends and adjust our procurement strategies to safeguard ethical sourcing and supply chain resilience.

Taxonomy and country specific risks

Powerlink's modern slavery risk assessment considers both country-level and industry-specific (taxonomy) risks across our supply chain. While certain sectors and regions are known to carry elevated risks—particularly those involving low-skilled labour, outsourced services, or raw material extraction—our Tier 1 supplier base is predominantly domestic, with the majority of spend occurring within Australia. This reduces the direct exposure to high-risk jurisdictions.

Powerlink sources most goods and services from Tier 1 Australian suppliers. However, **Network materials**—our second largest procurement category—may include components manufactured in high-risk countries.

Based on due diligence undertaken during the reporting period, Powerlink's top 10 spend and high-risk suppliers have established policies and processes in place to identify and manage modern slavery risks within their operations and supply chains. These suppliers are also subject to corporate and legislative reporting obligations under the *Modern Slavery Act 2018*, as well as the suppliers' internal governance frameworks, to support the effective management of modern slavery risks across their supply chains.

Visibility beyond Tier 1 with our suppliers remains limited, and we acknowledge that deeper tiers may involve suppliers operating in higher-risk geographies or industries. One of the most significant challenges in addressing modern slavery risks lies in the limited visibility of second and third-tier suppliers. While Tier 1 suppliers are generally well understood and monitored, gaining insight into the practices and sourcing of sub-tier suppliers is complex. This complexity makes it difficult to accurately assess the true extent of modern slavery risk exposure deeper within the supply chain. We recognise this as a critical area for improvement and are exploring ways to enhance traceability and engagement beyond our immediate suppliers.

Our actions to address modern slavery risks

LOOKING BACK - FY2024/25 deliverables

Pillar	FY2024/25 actions
Governance	Ongoing review and improvement of Powerlink frameworks, standards and procedures to increase their effectiveness in helping us manage Powerlink's modern slavery risks.
Capability uplift	Undertake dedicated training efforts within Powerlink aimed towards improving knowledge and awareness of modern slavery issues including refreshing Powerlink's existing modern slavery training module. Design and implement supplier engagement and awareness initiatives based on insights from supply chain risk assessment.
Supply chain risk assessment and due diligence	Formalise a strategy for modern slavery risk assessment of our supply chain and associated due diligence activities to guide our work in this space. Application of consistent and structured due diligence processes coupled with supplier engagement activities aligned to Powerlink's strategy for modern slavery risk assessment of its supply chain.
Remediation	Investigate industry best practice in the application of procedures for development and implementation of corrective action plans.
Collaboration	Continue our collaboration with industry peers to identify best-practice approaches to modern slavery due diligence in the supply chain and research ways to maximise our collective impact in this area.
Reporting	Establish reporting on measuring effectiveness of actions.

FY2024/25 highlights

Effective action aimed at eradicating modern slavery involves ongoing and long-term initiatives. During the reporting period, we prioritised strengthening our core capabilities in identifying, assessing and addressing modern slavery risks.

Details of the actions taken during the reporting period are provided below.

Governance

Anti-Slavery Working Group

During the reporting period, Powerlink's Anti-Slavery Working Group maintained its quarterly schedule for the modern slavery program of works.

In FY2024/25, the Anti-Slavery Working Group continued to play a central role in driving our modern slavery response. Key activities included reviewing supplier risk profiles, participating in desktop due diligence activities, providing feedback on internal training materials, and coordinating cross-functional engagement to improve awareness and accountability. The group also began scoping initiatives to enhance supply chain transparency beyond Tier 1, recognising the need for deeper visibility into potential risk areas.

Ongoing review and improvement of Powerlink frameworks, standards and procedures

Powerlink's Request for Quote, and Invitation to Tender templates were updated to align with changing business requirements and to comply with the *Modern Slavery Act 2018* as well as related risk mitigation measures. Internal consultations informed revisions to due diligence procedures and supplier engagement protocols incorporating recent risk assessments.

Capability uplift

Education and awareness remain essential components in the fight against modern slavery. Throughout the reporting period, Powerlink maintained its commitment to enhancing staff awareness by implementing a variety of targeted initiatives.

Training

As reported in previous statements, Powerlink has an existing training module for staff on modern slavery.

In FY2024/25, our Learning Management System (LMS) training module on modern slavery was refreshed to ensure content remained current, relevant, and aligned with evolving best practices. As part of this process, staff in procurement-related roles who had not yet completed the training were identified. The updated module will be rolled out to those staff during FY2025/26.

339 staff completed the training during the reporting period, reinforcing our commitment to awareness and capability-building. Additionally, we presented on modern slavery risks and mitigation strategies at various industry forums, further contributing to sector-wide dialogue and collaboration.

Other awareness raising initiatives

A business-wide survey on Modern Slavery awareness received strong participation across all divisions and identified key improvement areas. These insights informed the development of key performance indicators to measure the effectiveness of our training participation and engagement feedback.

To mark the International Day for the Abolition of Slavery, during November 2024 we hosted a dedicated webinar at Powerlink featuring a guest speaker with expertise in human rights and ethical sourcing. The session aimed to deepen staff understanding of modern slavery issues and encourage meaningful dialogue. In conjunction with the event, we released updated educational resources and posts across internal channels to support ongoing awareness and engagement. This initiative reflects our commitment to fostering a culture of learning and accountability in addressing modern slavery risks.

To strengthen our commitment to addressing modern slavery risks, we have enhanced our resources by adding dedicated content to our intranet Procurement Knowledgebase page. This initiative aims to raise awareness among our teams, providing practical guidance and tools to identify, prevent, and manage modern slavery risks across our procurement activities.

Supply chain risk assessment and due diligence

Identifying and addressing the risks of modern slavery within our supply chain presents significant challenges. Modern slavery often operates in hidden and informal networks, frequently involving multiple tiers of suppliers. Factors such as unclear business practices, limited visibility over subcontractors, and the vulnerability of at-risk populations further complicate detection and prevention efforts. These complexities require ongoing vigilance and a comprehensive approach to ensure that robust safeguards are implemented and maintained across all aspects of our business operations.

Modern Slavery Strategy

In FY2024/25, we enhanced supply chain visibility by adopting a Modern Slavery Strategy to provide formal structure and mechanism around preventing, detecting, and addressing risks across our supply chain. Our goal is to uphold ethical standards and human rights through active engagement, strong governance, and ongoing improvement. The strategy adopted the 6 key pillars (focus areas) we identified in our 2023/2024 Modern Slavery Statement, and the below actions.

- **Governance:** Strengthen oversight through leadership commitment and clear responsibilities.
- **Supply Chain Risk Assessment and Due Diligence:** Regularly assess and manage risks in operations and supply chains.
- **Collaboration:** Collaborate with suppliers to improve transparency and ethical practices.
- **Capability Uplift:** Build internal capability through targeted education and resources.
- **Remediation and Support:** Establish pathways for reporting and addressing modern slavery concerns.
- **Monitoring and Reporting:** Track progress and report transparently through the Modern Slavery Statement.

Risk assessment and due diligence

During FY2024/25, a comprehensive supply chain risk assessment and due diligence process was undertaken to identify and address potential modern slavery risks. This involved analysing both domestic and international suppliers to determine areas of elevated risk and implement appropriate mitigation strategies.

We approached the risk assessment and due diligence as follows:

- A targeted list of suppliers was compiled, including all suppliers with spend exceeding \$500,000 between July 2022 and February 2024, as well as all international suppliers regardless of spend.
- Of a total active vendor base of 2,752 vendors, 1,583 suppliers —representing 96% of total expenditure—were assessed using the Informed365 Modern Slavery Risk tool. Powerlink utilises the Informed365 Modern Slavery Risk tool to assess and categorise supplier risk profiles, supporting our commitment to robust supply chain due diligence and effective modern slavery risk management.
- These suppliers were then categorised based on inherent risk ratings derived from country and industry risk factors.

Table 1 summarises the inherent modern slavery risk ratings for these suppliers—assessed using country and category risk factors—and outlines the due diligence measures undertaken.

Modern slavery risk profile	Count of suppliers	Due diligence	Outcomes
Very low risk	7	No action taken	N/A
Low risk	884	No action taken	N/A
Medium risk	670	Combination of the following initiatives and/or tools based on relevance: <ul style="list-style-type: none"> • Supplier assessment questionnaires • Suppliers published Modern Slavery Statements 	Distribution of anti-slavery resources to suppliers to raise awareness and either or a combination of the following actions: <ul style="list-style-type: none"> • Direct engagement through one-on-one meetings
Critical risk (High or Very High risk or Top 10 by spend)	22	<ul style="list-style-type: none"> • Information provided by suppliers during sourcing processes • Desktop research of supplier profiles and media alerts • Supplier Site Audits 	<ul style="list-style-type: none"> • Suppliers identified as critical will be reviewed on a quarterly basis with their corresponding procurement representative and scope owner, to monitor risk mitigation progress and ensure ongoing accountability
Total	1583		

Table 1 Modern slavery risk ratings for Powerlink suppliers

Supplier engagement

During the reporting period, we actively engaged with our delivery partners to raise awareness and promote shared responsibility in addressing modern slavery risks. This included targeted communications to reinforce expectations and share relevant resources. We also presented to key suppliers at the Powerlink Delivery Partner Forum, where we outlined the steps we are taking to mitigate modern slavery risks across our operations and supply chain. The session was well received, with positive feedback from attendees and strengthened relationships with our delivery partners as a result.

Media monitoring

Media monitoring continues to play an essential role in identifying trends and patterns in modern slavery.

To support our due diligence processes, we continued monitoring the media through alerts and other mechanisms. Through analysis of news articles and reports, we can identify suppliers, regions, industries, or practices that may present increased risks or areas to watch out for. This approach also helps us remain informed about current events and public discussions related to modern slavery, which contributes to taking precautionary steps as needed.

Additional due diligence initiatives

As part of our ongoing efforts to strengthen modern slavery risk management, we explored additional mechanisms to identify potential high-risk suppliers. This included considering a review of the U.S. Department of Homeland Security's UFLPA Entity List against our supplier base as a potential discovery exercise. While we recognise the need to assess the reliability and applicability of such external sources, this approach could provide an additional layer of due diligence to help identify cases requiring deeper investigation.

Remediation

We developed a guide to support our approach to modern slavery remediation. The guide outlines industry best practices for developing and implementing Corrective Action Plans with suppliers, focusing on ethical, transparent, and victim-centred remediation.

The principles outlined in the guide include:

- Do no harm: Avoid punitive disengagement from suppliers.
- Engagement over exclusion: Support supplier improvement through training and dialogue.
- Accountability and transparency: Define roles, document progress, and report outcomes.
- Root cause analysis: Address systemic issues like recruitment fees or excessive overtime.
- Stakeholder engagement: Involve affected workers, unions, and civil society.
- Monitoring and reporting: Use independent audits and feedback loops to assess effectiveness.

Where a supplier fails to adhere to their agreed improvement plan or is identified as a repeat offender in relation to modern slavery risks, Powerlink follows the escalation procedures outlined in its processes for modern slavery supply chain risk assessment, modern slavery incident response and managing unco-

operative suppliers. These processes outline escalation, corrective action, monitoring, and (if necessary) disengagement from suppliers who do not comply. This approach aligns with Queensland Government procurement protocols and the requirements of the Modern Slavery Act 2018 (Cth).

Reporting

Insights from the staff awareness survey and supply chain risk assessments guided the development of key performance indicators (KPIs) to measure the effectiveness of training participation, engagement, and ongoing review of key suppliers. The work completed is covered in the Effectiveness Assessment section of this Statement.

This work aligns with Powerlink's commitment to formalising due diligence strategies and enhancing supplier engagement initiatives.

Collaboration

Sustainability collaboration

Throughout the reporting period, we actively collaborated with other government-owned energy corporations and industry partners to address complex sustainability challenges, including modern slavery risks. This has assisted to share knowledge, align approaches, and explore joint initiatives. These forums focused on reducing the impact of ESG compliance on our supply base, leveraging economies of scale for supply chain verification and data sharing, and developing consistent sustainability practices. Our engagement included discussions on modern slavery assessments, supplier engagement strategies, and the integration of social performance frameworks. By working together, we are strengthening our collective ability to identify and mitigate modern slavery risks across the energy sector, while fostering innovation and continuous improvement in our sustainability practices.

Energy Procurement Supply Association (EPSA)

Powerlink is a member of EPSA which is a not-for-profit association consisting of representatives from energy industry corporations from the Asia-Pacific region. The EPSA Modern Slavery sub-committee was formed to facilitate collaboration between EPSA member organisations and develop a standardised approach to supplier engagement on modern slavery.

During the reporting period, we continued to participate in EPSA meetings and remained engaged with the EPSA consortium on supplier resources and platform improvements. This included exploring potential options for including additional supply chain tiers in assessments, improvement of due diligence processes, refining our supplier assessment questionnaires and leveraging EPSA connections and knowledge to enhance Powerlink's response to modern slavery.

Effectiveness assessment

To ensure the effectiveness of our modern slavery risk mitigation activities, we have established a structured reporting and review framework guided by insights from staff awareness surveys and supply chain risk assessments.

Key performance indicators (KPIs) have been developed to monitor training participation, staff engagement, and the ongoing review of key suppliers.

Our approach includes the below indicators:

- half-yearly reviews of employee assignments to the modern slavery training module
- quarterly monitoring of staff completion rates
- an annual staff awareness survey.
- review and update of our critical supplier list and associated actions on a half-yearly basis
- weekly media monitoring to identify emerging trends and risks
- number of complaints received in relation to modern slavery.

This cadence enables us to continuously assess and enhance the effectiveness of our modern slavery response. During FY2025/26, we intend to refine the above measures and commence formal reporting on some or all of these indicators.

Consultation and engagement

The consultation process for this Statement was managed by Powerlink's cross-functional Anti-Slavery Working Group, and involved the following stakeholders:

- QCN (Powerlink subsidiary); and
- Internal divisions of Powerlink where relevant.

The remit of the Anti-Slavery Working Group is to develop, review and refine Powerlink's response to modern slavery as a continuing journey.

Where possible and permitted by law, Powerlink seeks to work in collaboration with industry-wide initiatives and peer organisations to share initiatives and information, scale impact, and promote a coordinated approach to managing modern slavery risks.

Powerlink welcomes the appointment of Australia's inaugural Anti-Slavery Commissioner and supports the consultation to strengthen the *Modern Slavery Act 2018*, ensuring greater transparency and accountability across supply chains.

Our commitments going forward

With a clear framework now in place, we have the opportunity to build further on our modern slavery program. As per our six key pillars, below are the key focus areas for FY2025/26. The actions in these pillars are essential steps to ongoing modern slavery risk mitigation.

FY2025/26 focus areas

Pillar	FY2025/26 actions
Governance	Ongoing review and improvement of Powerlink frameworks, standards and procedures to increase their effectiveness in helping us manage Powerlink's modern slavery risks.
Capability uplift	Design a Modern Slavery fact sheet for suppliers and external partners.
Supply chain risk assessment and due diligence	<ul style="list-style-type: none"> Develop and implement a Supply chain due diligence strategy for Critical suppliers. Develop a case study in partnership with a Powerlink Tier 1 supplier to explore the practical challenges and issues associated with obtaining Tier 2 supply chain reporting, with the aim of identifying opportunities to improve transparency and visibility across the supply chain. Leverage the capabilities of our new Source-to-Contract system to strengthen modern slavery due diligence within our procurement processes. Develop a procurement desktop risk assessment tool for Modern Slavery.
Remediation	Monitor for any complaints or reported concerns , and if required utilise the paper "Industry best practices for developing and implementing Corrective Action Plans with suppliers" to develop a fit for purpose corrective action plan.
Collaboration	Continue our collaboration with industry peers to identify best-practice approaches to modern slavery due diligence in the supply chain and research ways to maximise our collective impact in this area.
Reporting	Establish reporting on measuring effectiveness of actions via identified key performance indicators

Compliance with mandatory criteria as outlined in the *Modern Slavery Act 2018 (Cth)*, s16(1)

Mandatory reporting criteria	Section	Pages
Identify each reporting entity covered by the joint statement	About this Statement	3
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	Our business, Our supply chain	4-11
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	Modern slavery risks	12-13
Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Our actions to assess modern slavery risks, Our commitments going forward	14-21
Any other relevant information	Our commitments going forward	21

Contact us

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