

Modern Slavery Statement 2025



Acknowledgements

AGL recognises the First Nations People as the Traditional Custodians of the lands on which we work, and acknowledges those communities' continuing connections to their lands, waters and cultures. We pay our respects to their Elders, past and present.

We acknowledge the victims and survivors of modern slavery crimes.

We also acknowledge and thank everyone who works to combat modern slavery, including people with lived experience.

Help and Support

For anyone experiencing, or at risk of modern slavery, you can seek help as follows:

- If you have immediate concerns for your safety, the safety of another person, or there is an emergency, call Triple Zero (000).
- You can contact the Australian Federal Police (AFP) on 131 237 or go to the AFP website at www.afp.gov.au.

Certain eligible people, including current and past employees, business partners and associates of AGL, as well as these people's relatives and dependents, can report any modern slavery-related issues relating to AGL's activities via our [Whistleblower Protection Policy](#) (a full list of those eligible to report through this mechanism is contained within the Policy).

You can make a report via our whistleblower services hotline by simply scanning the QR code and following the website link.



Approach to reporting

This Modern Slavery Statement (Statement) is provided by AGL Energy Limited (AGL) in accordance with s16(1) of the Australian Modern Slavery Act 2018 (Cth) (Act) and sets out the risks of modern slavery in AGL's operations and supply chains, the actions taken to assess and address those risks during the financial year, and how we assess the effectiveness of those actions.

The Statement is made for the period 1 July 2024 to 30 June 2025 (referred to as the reporting period, this year, financial year or FY25). It is submitted as a joint statement and applies to AGL, the AGL entities considered reporting entities under the Act (which are listed in [Appendix D](#) and the owned and controlled subsidiaries of AGL (AGL Subsidiaries). A full list of AGL Subsidiaries is included in our [FY25 Annual Report](#). The Statement also covers all brands which are part of the AGL Group, including:

- AGL
- Connect Now
- Energy360
- Everyt
- OVO Energy
- Perth Energy
- Sol Distribution
- Southern Phone Company

References to 'AGL', 'we', or 'our' throughout this Statement includes all AGL Entities and Subsidiaries covered by this Statement, unless otherwise specified.

Engaging and consulting with entities to prepare this Statement

The AGL Group operates a single overarching governance structure supported by uniform systems and processes that allow a consistent risk management approach to be adopted for the management of operational and supply chain risks (including modern slavery risks) across the significant majority of entities comprised within the AGL Group. This structure provides for and embeds ongoing consultation and engagement across the AGL Group, including for the development of this Statement.

In limited circumstances, AGL maintains subsidiaries that operate fully or partially independently of AGL's governance structure and supporting processes. In these circumstances, a consultation process is undertaken as part of the development of this Statement to ensure all material modern slavery risks are identified, analysed and disclosed. Further details on this consultation process are included in Section 5 of this Statement.

Board approval

This Statement was approved by the Board of Directors of AGL, which is the holding company of the AGL Subsidiaries, on 9 December 2025. The Statement has been signed by the Chair and the Managing Director and CEO of AGL.



Miles George
Chair

Forward-looking Statements

This Statement includes information about AGL's modern slavery risk management for the period 1 July 2024 to 30 June 2025. Any forward-looking statements are based on AGL's current expectations, best estimates and assumptions as at the date of preparation, many of which are beyond AGL's control. These forward-looking statements are not guarantees or predictions of future performance, and involve known and unknown risks, which may cause actual results to differ materially from those expressed in the report.

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CEO Message

I am pleased to present AGL's Modern Slavery Statement for FY25. At AGL, we respect the dignity and human rights of all people and are committed to taking action to address modern slavery.

As Australia's largest private electricity generation operator, delivering over 4.6 million customer services, we understand the positive impact we can have on our communities, and the important role we play in identifying and eliminating modern slavery both locally and across the globe.

Since the release of our inaugural Modern Slavery Statement in 2020, AGL and our partners have made material improvements in our understanding of and approach to the management of the risks of modern slavery in our operations and supply chains. We've continued this improvement focus across FY25, including:

- Further expanding our social audits of higher risk suppliers;
- Building on our employee and supplier training and awareness programs; and
- Implementing an ESG Decision Making Framework which embeds environmental, social and governance considerations, including modern slavery risk, into the work we do and the decisions we make.

While we're proud of the progress we've made, we recognise modern slavery continues to impact too many people both in Australia and around the globe. It's a complex global issue that demands proactive and sustained action. To bring about change and to put an end to the conditions that allow modern slavery to exist, strong partnerships are needed with survivors, our business partners, governments and communities. AGL is committed to ongoing collaboration - working with industry peers, government bodies, and civil society to share knowledge and promote best practices.

We believe treating modern slavery as a risk to people, not just to business, is essential to driving meaningful and lasting change.



Damien Nicks
Managing Director & CEO



About AGL

Who we are

Proudly Australian for more than 187 years, AGL is an Australian company (ABN: 74 115 061 375), registered in New South Wales. AGL supplies energy and other essential services to residential, small and large businesses and wholesale customers. AGL is committed to providing our customers with simple and accessible essential services as they decarbonise and electrify the way they live, move and work.

AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market (NEM), comprising coal and gas-fired generation, renewable energy sources such as wind, hydro and solar, and batteries and other firming and storage technology. We are building on our history as one of Australia's leading private investors in renewable energy to be a leader in the transition to a lower emissions and smart energy future in line with the goals of our [Climate Transition Action Plan](#).

The diagram on page 5 presents a high-level overview of our strategic focus, along with the foundational elements that support and enable its delivery. Further detail on AGL's structure, operations and supply chain can be found in [Appendix A](#).

Our purpose and values

The world is changing and at AGL we're looking to the future. AGL's purpose, **Powering Australian life**, and company values (**Bring on tomorrow; Can do. Will do; and Be safe. Be supportive**) reflect our commitment to provide reliable, sustainable and affordable energy solutions for millions of homes and businesses as we play our role in Australia's energy transition. At an enterprise level, AGL's purpose provides our company, our Directors and our employees and contractors with the foundations for action and, together with our values, guides our thinking and decision-making so that we continue to perform and deliver for our customers, communities and other stakeholders.

Our purpose
Why we exist

Our purpose is centred on Powering Australian Life

At AGL, we believe energy makes life better. That's why we're passionate about powering the way Australians live, move and work



Bring on tomorrow.

Seize the opportunity. The work we do today impacts the Australia we leave for future generations. We don't have all the answers. But through continuous improvement and working together, we'll uncover opportunities that make history. For all of us. Bring it on.



Can do. Will do.

Make things happen. We show up with a positive attitude. We're resilient, confident, and flexible in the way we work. Combine this with our expertise and insight, we always deliver. For ourselves, each other, and our customers.



Be safe. Be supportive.

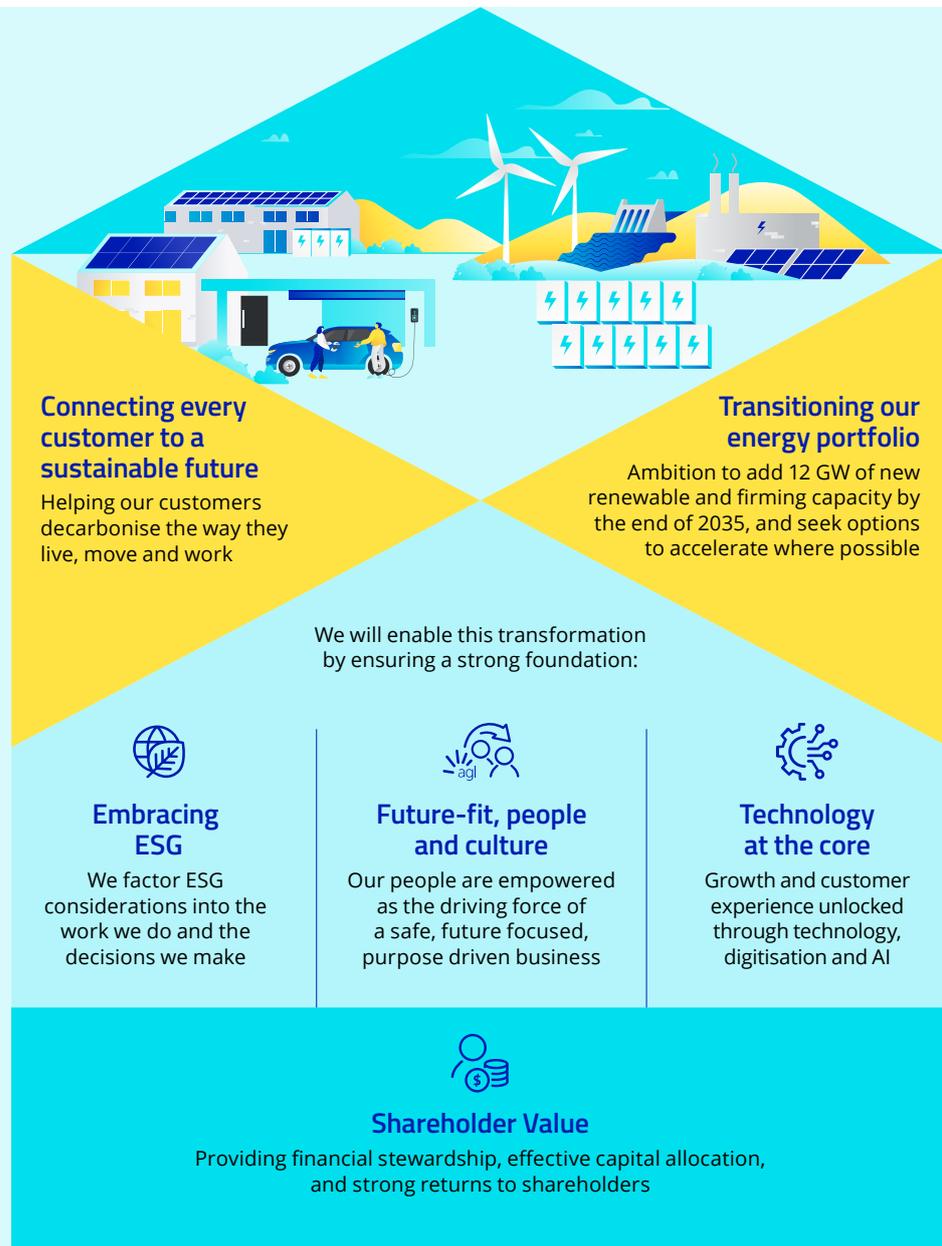
Be a good human. Upholding a safe environment at work is on all of us. So we back ourselves and we back each other. Creating a culture where everyone feels included, heard and safe, every day.

Our values
Guides our thinking and decision making

Our strategic focus
What we're focusing on for success

Our foundation
Underpins everything we do

Delivering for Shareholders



1. A Summary of AGL's Key Modern Slavery Risks

AGL operates a complex business which includes operations across Australia and a local and global supply chain that provides support to our Australian operations.

A summary of the key modern slavery risks inherent in AGL's operations and supply chains is set out below. While the risks identified remain consistent with those identified through our FY24 Modern Slavery Statement, we continue to take steps to better understand our material modern slavery-related risks, and to refine the measures in place to effectively manage these risks. The below risks are discussed in further detail in Section 3 of this Statement.

Risks in our Operations

Offshore labour

AGL engages offshore labour for activities such as call centre support in geographies with comparatively higher inherent modern slavery risk.

Engagement of on-shore labour via third parties (including subcontracting)

AGL engages third-party recruitment firms to provide contingent labour across various locations in Australia, for services including administrative support and operational site maintenance support. In some instances, AGL has comparatively less visibility over labour practices employed through these contracting arrangements.

Acquisitions, investments and joint ventures

AGL opportunistically enters into acquisitions, investments and joint ventures where they align to our strategic objectives. Depending on their nature, these can impact our broader modern slavery risk.

Risks in our Supply Chain

<p>Solar supply chain</p> <p>AGL supplies and installs solar panels for residential and business customers. The solar panel supply chain, including the procurement, transport and installation of solar panels, is considered high risk of modern slavery.</p>	<p>Sourcing of batteries</p> <p>AGL sources batteries for a wide variety of uses. Batteries are considered high risk for modern slavery due to the sourcing, transportation and manufacturing processes used.</p>	<p>Sourcing of electronic goods (e.g. laptops, modems, and mobiles)</p> <p>AGL sources a wide range of electronic goods for use within our operations and for our customers. Electronic goods are considered high risk for modern slavery due to associated sourcing, transportation and manufacturing processes.</p>
<p>Cleaning, maintenance and security services</p> <p>AGL procures these services across our corporate and operational sites. These categories of work have been assessed as high risk of modern slavery due to factors including remote work locations, manual labour, on demand work and diminished visibility over subcontracting arrangements.</p>	<p>Power purchasing of renewable certificates</p> <p>Power purchasing agreements used to source electricity for our customers typically involve renewable assets which can be associated with modern slavery risk, including forced labour practices and the sourcing of required materials that are higher risk for modern slavery.</p>	<p>Construction</p> <p>AGL works with third parties to construct grid scale renewable and firming generation to support the transition of AGL's energy portfolio. Construction can be associated with modern slavery risk due to the nature of renewable construction projects, including the raw materials used and the propensity for construction projects to leverage complex operations and supply chains.</p>
<p>Carbon offsets</p> <p>AGL purchases carbon offsets to offer carbon neutral products to our customers. Where these are purchased outside of Australia, they may present a comparatively higher modern slavery risk due to variations in governance requirements in some geographies.</p>		



1. A Summary of AGL's Key Modern Slavery Risks

1.1 AGL's International Spend

This page sets out the countries of AGL's international spend¹, the number of Direct Suppliers², the number of First Tier Suppliers³, and includes the geographic risk level for each country. Further detail on AGL's international spend can be found in Appendix A.

5,175

Number of Direct suppliers

\$2.59B

Procurement spend

35.4%

Percentage of spend to First Tier suppliers

16

Number of First Tier suppliers

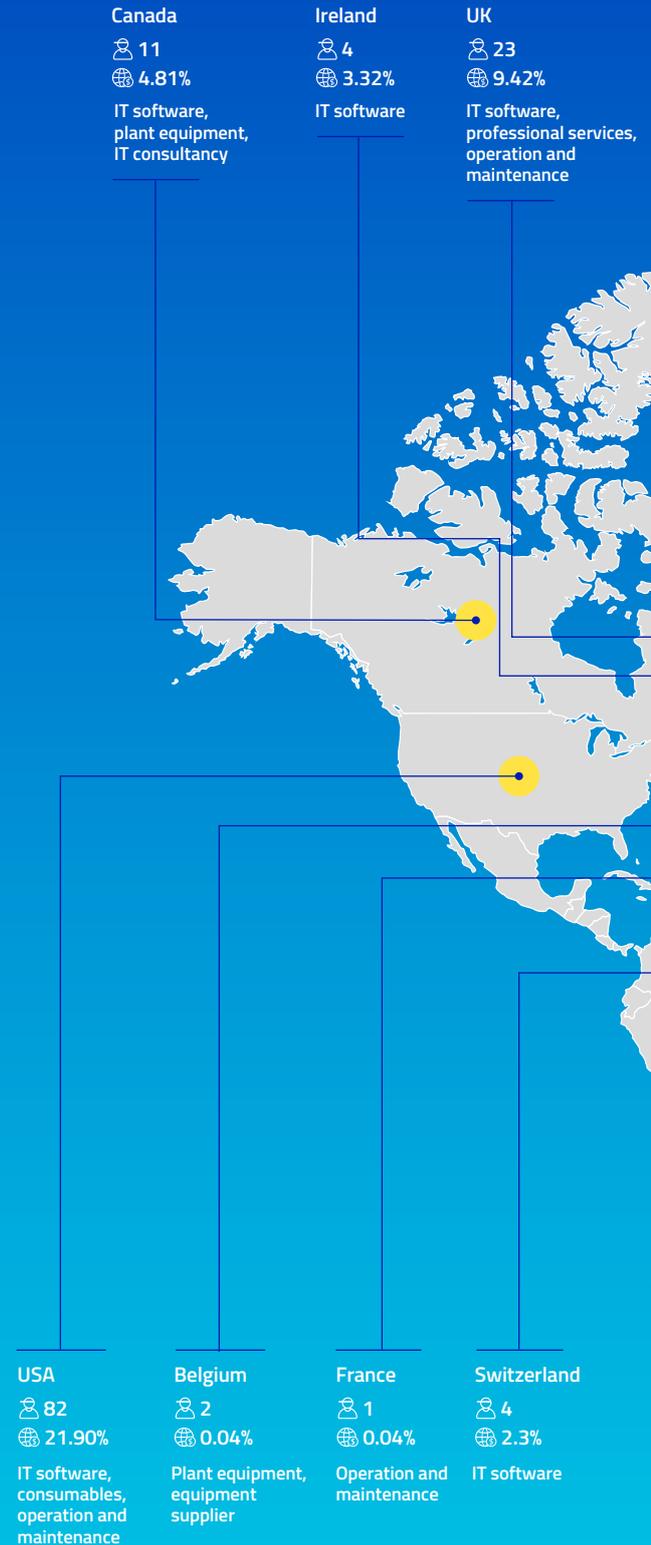
26

Total countries of supply

97%

Percentage of spend made to Australian businesses

1. The supplier location in the map is predominantly based on billing address. We recognise that the supplier billing address will not always provide an accurate indication of the geographic risks relevant to a supplier, and as a result AGL will continue to analyse the locations our material and high-risk suppliers operate within, and therefore the geographic risks these present, across future reporting periods.
2. Direct Suppliers are suppliers with whom AGL has direct contracts.
3. First Tier Suppliers are AGL's direct suppliers who are identified as most important to AGL based on risk, value and criticality to our operations.





Legend

- Highest risk
- High risk
- Moderate to low risk
- Number of suppliers
- % of international spend

2. A Summary of Continuous Improvement Initiatives

Since the release of our inaugural Statement in 2020, AGL and our partners have made material improvements in our understanding and approach to managing the risks of modern slavery in our operations and supply chains. We have continued this improvement focus across FY25, making the following further enhancements to our modern slavery risk management.

ESG Decision Making Framework	Awareness and Training	Accessibility of Grievance Mechanism	Advancing our Social Audit Program
<p>AGL has embedded a new ESG Decision Making Framework which requires the formal consideration of ESG factors, including modern slavery risk, in all key decision making bodies and processes.</p> <p>+ Read more on page 18</p>	<p>AGL invited suppliers in the renewables sector to a Supplier Briefing Session, which enabled AGL to highlight and reinforce the importance of proactive risk management and our expectations relating to modern slavery management.</p> <p>For the second year, AGL engaged a modern slavery and human rights advocate to speak to his lived experience and build further awareness across the organisation. In FY25, we invited him to share his story at one of our operational sites.</p> <p>+ Read more on page 28 and 35</p>	<p>AGL has improved the accessibility of our grievance mechanism, including publicising a QR Code which can be used to easily record a complaint. This QR Code was also shared with suppliers through the Supplier Briefing session.</p> <p>+ Read more on page 51</p>	<p>AGL has increased and extended its Social Audit program which in FY25 included Tier 2 suppliers within our renewables supply chain.</p> <p>+ Read more on page 34</p>

Looking forward to FY26 and beyond

While we are proud of the progress we have made, we recognise that effective management of this complex area requires ongoing and continuous improvement. Looking ahead, we are committed to continually evaluating and improving the effectiveness of our modern slavery risk management practices and working with a broad range of stakeholders to increase awareness, and advocate for better global solutions.

3. AGL's Key Modern Slavery Risks

AGL applies its enterprise risk management approach, which is aligned to the international standard for risk management (ISO 31000 – Risk Management), to the identification, analysis and management of modern slavery risks.

As in previous periods, our risk identification process has also been informed by modern slavery risk indicators. Drawn from a number of sources, including publications such as the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (May 2023) and advice from external human rights consultancies, AGL considers relevant risk indicators as part of the identification of material modern slavery risks across our business operations and supply chain.

During FY25, management considered changes to AGL's business to determine whether any new risk indicators were relevant. Following this review, the indicators reported in our FY24 Statement (summarised below) were found to remain the most relevant for AGL.

AGL's Relevant Modern Slavery Risk Indicators

 <p>Vulnerable populations</p>	 <p>High risk business models</p>	 <p>High risk sectors or categories</p>	 <p>High risk geographies</p>
<p>Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations.</p>	<p>Business models that rely on third parties for the provision of services – often labour hire.</p>	<p>Products and services regarded by independent bodies as having heightened inherent modern slavery risk.</p>	<p>Countries or regions which are known to have higher human rights (and modern slavery) risks.</p>

Informed by these key risk indicators, and consistent with the approach taken in FY24, AGL undertook the following key activities to review its modern slavery risk profile for FY25:

<p>Modern slavery risk assessment</p> 	<p>Material changes to structure, operations and supply chain</p> 	<p>Analysis of AGL's supply chain</p> 	<p>Review of external environment</p> 	<p>Modern Slavery Working Group</p> 
<p>AGL's Modern Slavery Subject Matter Experts (SMEs) collaborated with business unit risk teams to reassess the modern slavery risks across each business unit's value chain. In FY25, this process included the engagement of a third party consultant to provide specialist input.</p>	<p>Material changes to AGL's structure, operations, and supply chains since the FY24 Statement were considered to determine if any change occurring throughout FY25 had an impact on our modern slavery risks. This analysis considered changes in product service offerings, internal restructures, changes to processes, and investments/ acquisitions made throughout the year.</p>	<p>AGL engaged an independent third-party consultant to conduct data analytics to understand more fully the modern slavery risks inherent within our supply chain. Further details on this assessment can be in Appendix B.</p>	<p>AGL's Modern Slavery SMEs reviewed the external environment for updates to modern slavery risk areas. This review included engagement with external stakeholders.</p>	<p>Input, support and feedback on the risks identified was sought from AGL's Modern Slavery Working Group.</p>

Through the application of AGL's enterprise risk management approach, and consideration of the identified modern slavery risk indicators, the modern slavery risks related to our operations and supply chains were identified and are documented in Section [3.1](#) and Section [3.2](#).

3. AGL's Key Modern Slavery Risks

3.1 Modern slavery risks in our operations

Across FY25, three material modern slavery risks were identified to be inherent within AGL's operations. These risk areas, which are also consistent with those risk areas disclosed in our FY24 Statement, are set out below. The key risk mitigations implemented to address these risks are set out in Section [4.2.1](#).

Operations	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis ¹ - Illustrative Risk Scenarios
Offshore Labour		
<p>AGL engages offshore labour through third parties in geographies which have been assessed to have comparatively higher inherent risk of modern slavery practices.</p> <p>These engagements include outsourced technology support and call centre services using workers located in India, South Africa and the Philippines - countries which are considered at higher geographic risk of modern slavery by third-party experts. These workers may therefore be at a comparatively greater risk of being subject to forced labour or child labour than workers employed in lower risk geographies. In addition, AGL has comparatively less visibility over practices employed through these arrangements outside Australia.</p>	 	<p>Directly Linked: Offshore organisations contracted by AGL may engage in modern slavery practices, such as charging workers recruitment fees, requiring excessive overtime or subjecting workers to debt bondage.</p> <p>Contribute: AGL's contract terms, such as pricing or output requirements, may place undue pressure on offshore suppliers, resulting in these suppliers exploiting their workers to meet AGL's requirements.</p>
Engagement of On-shore Labour via Third Parties (including Subcontracting)		
<p>AGL utilises third-party recruitment firms to engage on-shore contingent labour (e.g. to provide fixed-term administrative assistance). AGL also engages with third parties for the provision of labour services (such as maintenance and cleaning at our operational sites, or the installation of solar panels), who may subcontract aspects of the service delivery to other organisations. These engagements may also involve the use of migrant workers, and often involve low barriers to entry. In these cases, AGL has comparatively less visibility over practices employed through these contracting arrangements. In some cases, workers may also be engaged to work in remote areas, which significantly increases the complexity of required oversight by AGL as well as by regulators, unions, and third-party labour providers.</p>	 	<p>Directly Linked: AGL engages third-party suppliers to install solar panels in metropolitan as well as remote regional areas, who may use and exploit migrant workers and thereby subject these workers to conditions of forced labour.</p> <p>Contribute: AGL uses leverage to demand that a supplier delivers goods within an unrealistic timeframe, and in turn, the supplier uses exploitive practices on its workers (such as demanding excessive overtime) to meet AGL's requirements.</p>
Acquisitions, Investments and Joint Ventures		
<p>Depending on the sector, acquisitions, investments in or partnerships with other organisations can expose AGL to high-risk business models, vulnerable populations, high-risk geographies, or reduce AGL's understanding of its modern slavery risk profile.</p> <p>As we continue to progress our multi-decade strategy to progressively decarbonise our asset portfolio, and connect every customer to a sustainable future, we expect to continue to actively consider acquisitions, investments and joint venture activity over time.</p>	  	<p>Directly Linked: AGL invests in, but does not have control over, an organisation that is developing renewable energy assets. The organisation has immature procurement practices which result in materials and products being sourced from manufacturers who are engaging in modern slavery practices.</p> <p>Contribute: AGL invests in a Joint Venture to develop energy assets. AGL identifies that the Joint Venture has immature procurement processes and fails to take steps to address these process weaknesses. This leads to materials and products being sourced from manufacturers who are engaging in modern slavery practices.</p>

1. The 'cause, contribute or directly linked' framework is explained in more detail in [Appendix C](#) of this Statement.

3.2 Modern slavery risks in our supply chain

Across FY25, seven material modern slavery risks were identified to be inherent within AGL's supply chains. These risk areas, which are also consistent with those risk areas disclosed through our FY24 Statement, are set out below. The key risk mitigations implemented to address these risks are set out in Section [4.2.2](#).

Supply Chain	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis - Illustrative Risk Scenarios
<p>Solar Supply Chain</p> <p>AGL procures solar-related products and services for the purposes of transitioning our energy portfolio, and for the supply and installation of solar panels to our residential and commercial & industrial customers. Solar related products and services are considered inherently higher risk for modern slavery, due to a number of material risks present throughout the supply chain.</p> <p>Specifically, the manufacturing of solar panels and related components, and the polysilicon used in some solar products, have been associated with the exploitation of workers in the Xinjiang Uyghur Autonomous Region in China¹.</p> <p>Transportation services relied on for the procurement of solar-related products also present an inherently higher risk of modern slavery practices, in particular within the maritime industry due to constrained costs, a fragmented system of regulatory oversight and limitations on the effective enforcement of conditions onboard vessels.</p> <p>Solar installations have also been assessed to be an area of modern slavery risk due to the common practice of utilising migrant workers, complex and informal subcontracting, labour hire involving multiple sub-contracting arrangements, and low barriers to entry for labour hire providers. Where solar installations occur in remote areas, the site's remoteness increases the complexity of required oversight by AGL as well as by regulators and unions. Accordingly, there are unique risks associated with these installations, which may heighten the risks associated with modern slavery.</p>	   	<p>Directly Linked: AGL procures solar modules or components that are sourced, manufactured, or transported using forced and/or child labour.</p> <p>Contribute: AGL receives but does not act on a complaint from a worker of its solar panel provider that they have been subject to excessive working hours to complete an order for AGL.</p>
<p>Sourcing of Batteries</p> <p>AGL sources batteries for a wide variety of uses, including for grid scale large energy storage infrastructure, community batteries, home batteries for retail customers, and for electronic equipment used throughout AGL (such as in laptop computers).</p> <p>The procurement of batteries is considered inherently higher risk for modern slavery due to risks present throughout the supply chain.</p> <p>Specifically, key materials used in the manufacturing of batteries (including lithium and cobalt) may be sourced from regions associated with human rights abuses. It is estimated that between 15% and 30% of the cobalt used in lithium batteries, in which solar energy is stored, is sourced from artisanal mines in the Democratic Republic of the Congo – where forced and child labour is common².</p> <p>Transportation services relied on for battery retailing also present an inherently high risk of modern slavery practices, in particular within the maritime industry due to constrained costs, a fragmented system of regulatory oversight and limitations on the effective enforcement of conditions onboard vessels.</p>	  	<p>Directly Linked: AGL sources lithium batteries which are subsequently identified to include components or materials manufactured or sourced from the use of forced and/or child labour.</p> <p>Contribute: AGL's purchasing practices associated with the procurement of batteries (such as unrealistic cost or volume requirements) place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in AGL's supply chain.</p>

3. AGL's Key Modern Slavery Risks

Supply Chain	Key Risk Indicators	Cause, Contribute or Directly Linked Analysis - Illustrative Risk Scenarios
Sourcing of Electronic Goods		
<p>AGL procures electronic goods, such as laptops, modems and mobile phones for use in its business operations.</p> <p>The electronics manufacturing industry is considered a high-risk sector for modern slavery due to low profit margins and tiered production systems typically associated with the industry. Manufacturing often takes place in less developed countries with relatively fewer legal and regulatory protections, hence there may be less oversight over labour rights. In addition, modern slavery risks are also present within the supply chains of these products, particularly in the sourcing of raw materials from high-risk geographies.</p>	  	<p>Directly Linked: AGL sources electronic goods such as modems and laptops for use in its corporate offices, which include components or materials manufactured or sourced from the use of forced and/or child labour.</p> <p>Contribute: AGL uses its leverage and shifts its procurement of electronic goods to a manufacturer that produces this equipment significantly cheaper than its previous supplier. The supplier uses exploitative practices with its workers (such as demanding excessive overtime) to meet AGL's requirements.</p>
Cleaning, Maintenance and Security Services		
<p>AGL employs the services of cleaning, maintenance and security contractors for a range of services across our corporate and operational sites.</p> <p>These categories of work have been independently assessed as comparatively higher-risk due to factors including remote work locations, manual labour, on-demand work and diminished visibility over subcontracting arrangements.</p>	  	<p>Directly Linked: AGL engages third parties for the provision of cleaning services across its sites. The third parties engage migrant workers on temporary visas who are subject to recruitment fees, debt bondage and/or conditions associated with forced labour.</p> <p>Contribute: AGL tender arrangements require cleaning, maintenance and security services to be provided at a discounted price point resulting in suppliers facing undue pressure to engage in practices that exploit their workers to meet the requirements of the tender.</p>
Power Purchasing Agreements		
<p>AGL enters into long term Power Purchasing Agreements (PPAs), committing to the purchase of energy supply from power generators such as wind farms or solar plants. PPAs typically require AGL to support the development of these renewable assets, which are considered higher risk for modern slavery due to forced labour practices associated with the sourcing and transport of materials required for utility-scale renewable assets.</p>		<p>Directly Linked: AGL enters a PPA with a utility-scale solar farm that, due to its immature procurement practices, purchases solar panels that are manufactured with the use of forced labour.</p>

Supply Chain

Key Risk Indicators

Cause, Contribute or Directly Linked Analysis - Illustrative Risk Scenarios

Supply Chain		
Construction		
<p>AGL works with third parties to construct grid scale renewable generation, storage and firming assets to support the transition of AGL's energy portfolio.</p> <p>As we transition our energy portfolio, AGL has an ambition to add 12 GW of new renewable and firming generation to our portfolio by 2035, and will seek options to accelerate where possible. As part of the delivery of these ambitions, we expect that construction activity will increase over time.</p>	   	<p>Directly Linked: AGL engages a principal contractor for the development of a grid-scale battery in regional Australia. The principal contractor engages sub-contractors to support the project without appropriate screening and monitoring, who subject their employees to poor working conditions akin to forced labour or associated with debt bondage.</p> <p>Contribute: AGL's commercial agreement with the principal contractor for the development of a grid-scale battery places undue pressure on the principal contractor to exploit their workers, resulting in modern slavery practices in AGL's supply chain.</p>
Carbon Offsets		
<p>AGL purchases carbon offsets to offer carbon neutral products to our customers. The carbon offsets are sourced both domestically and internationally. Offsets from some international markets are perceived to have higher risk in relation to modern slavery compared to offsets sourced from within Australia. This is due to the relatively stricter laws and oversight in Australia compared to some overseas jurisdictions that have comparatively less governance over the activities engaged in to create the carbon offsets, and due to the variability of carbon standards in projects associated with carbon offsets.</p>	  	<p>Directly Linked: AGL purchases carbon offsets on the international market that are associated with overseas sustainability projects. Such projects subject vulnerable populations to the conditions of forced labour.</p>

1. Cockayne, Huerta and Burcu, 'The Energy of Freedom?' Solar energy, modern slavery and the Just Transition.
2. Cockayne, Huerta and Burcu, 'The Energy of Freedom? Solar energy, modern slavery, and the Just Transition' pg. 5, 2022.

4. Managing our Modern Slavery Risks

AGL’s Modern Slavery Framework (Framework) outlines the methodology we apply to identify, analyse and manage modern slavery risks in a structured and consistent manner. The Framework also guides AGL’s approach to the identification, investigation and remediation of modern slavery grievances, and the development of prioritised and coordinated improvements to our modern slavery risk management processes over time.

During the reporting period, the Framework was reviewed to ensure it continued to support AGL’s modern slavery risk management practices. While this review found that the Framework remained fit for purpose, minor administrative updates were made to some aspects of the Framework, which are set out in the relevant sections below.

The Framework includes five core elements and eight supporting sub-elements, as summarised in the diagram below. Further detail relating to each sub-element can be found within the relevant report section reference set out below.

AGL’s Modern Slavery Framework

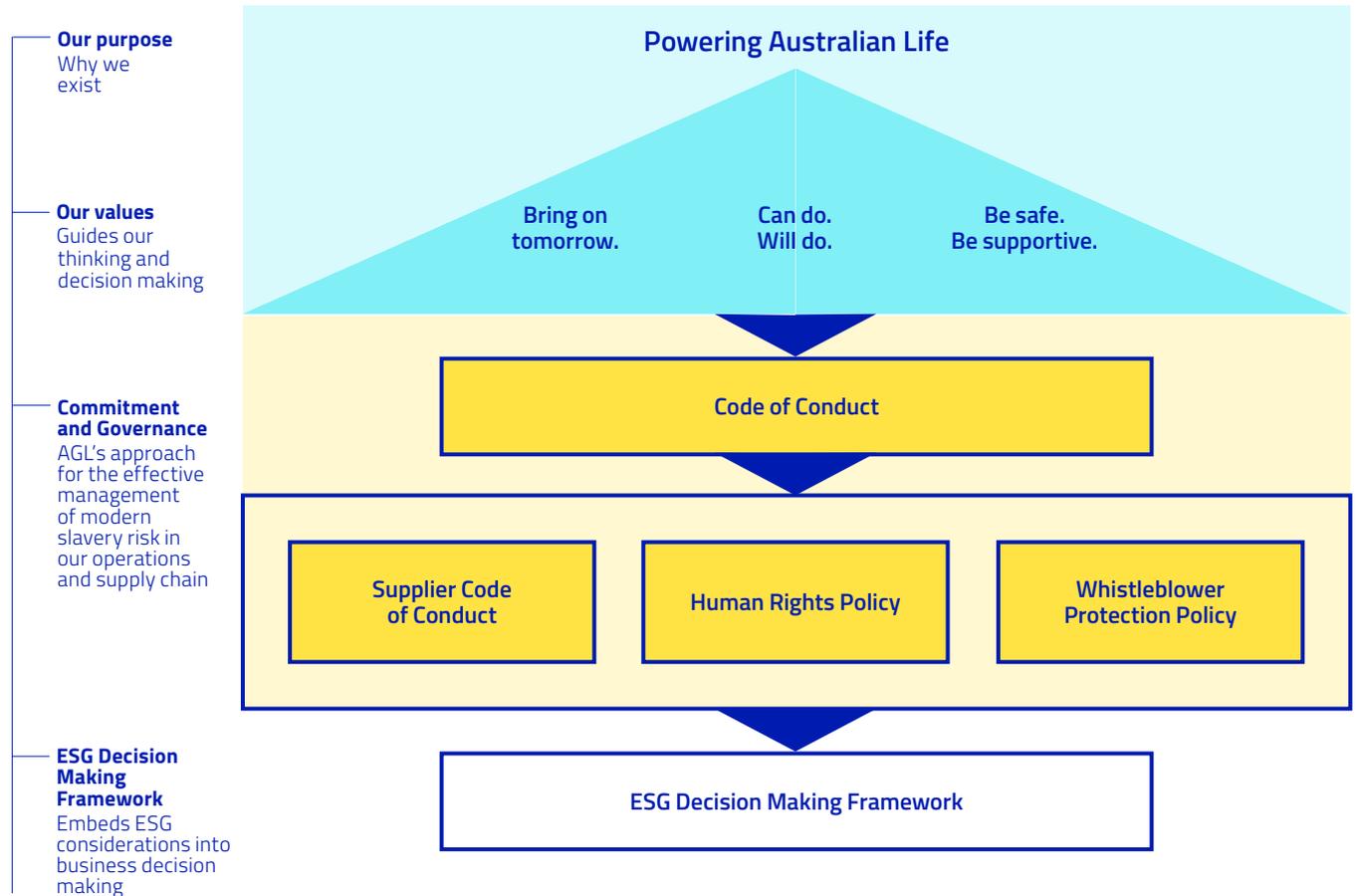




4.1 Commitment and Governance

The Commitment and Governance element sets out AGL’s approach to setting an appropriate tone from the top for the effective management of modern slavery risk in our operations and supply chain. The element, underpinned by our purpose and values described in the [About AGL](#) section, is supported by the following policies:

- AGL’s Code of Conduct;
- AGL’s Human Rights Policy;
- AGL’s Supplier Code of Conduct; and
- AGL’s Whistleblower Protection Policy.



These policies, which are further described in [Section 4.1.2](#) below, prescribe a clear set of commitments, requirements and expectations that shape our thinking and behaviour relating to the management of human rights-related risks at AGL. Complementing these policies, the Framework itself affirms AGL’s commitment to the effective management of modern slavery risk and describes in more detail the specific governance activities undertaken and roles and responsibilities that have been defined relating to modern slavery risk management. The Framework and AGL’s approach to modern slavery risk management has been developed considering the following key principles:

- **A consistent approach to modern slavery risk management:** effective governance ensures the organisation adopts a structured and consistent approach to identifying, managing and addressing modern slavery risks across the organisation.
- **Continuous improvement:** senior leaders across the organisation are committed to the continuous improvement of AGL’s modern slavery risk management.
- **Meeting stakeholder expectations:** modern slavery risk management must be responsive and proactive to meet the evolving demands of our stakeholders (including investors, customers, shareholders and the broader community).

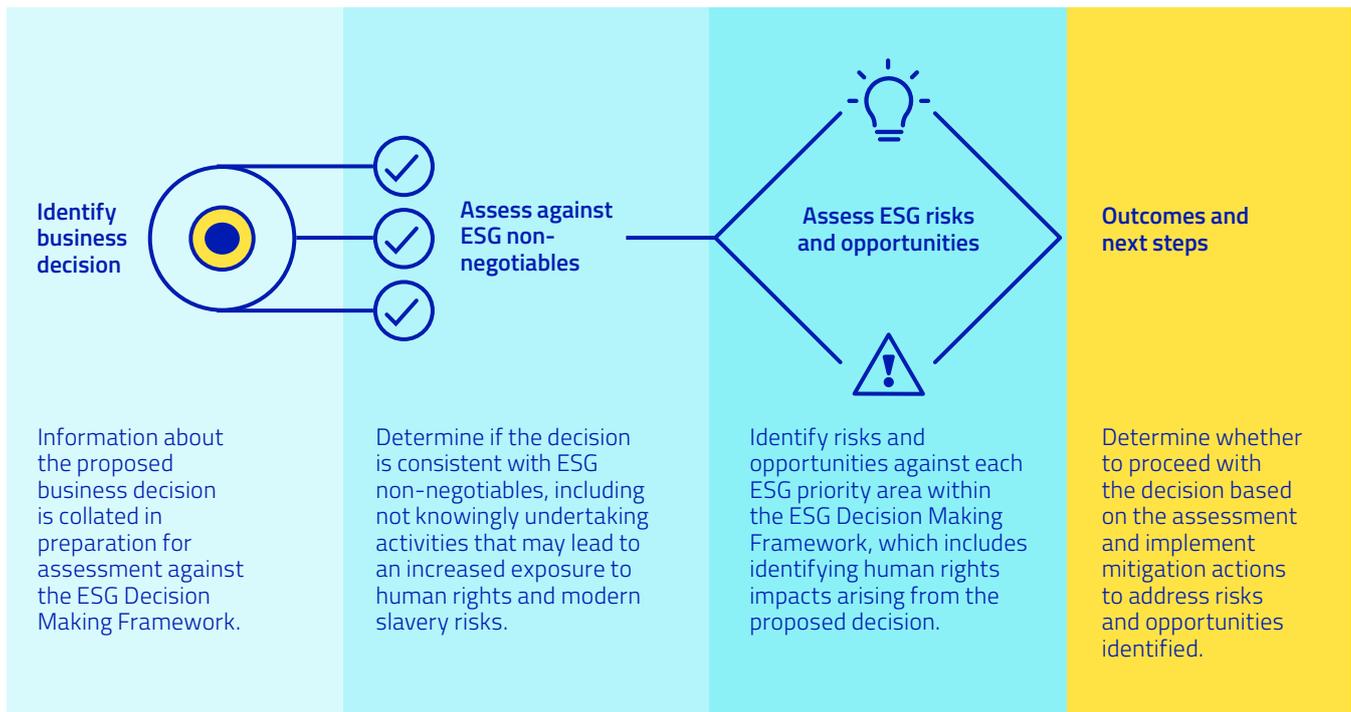
4. Managing our Modern Slavery Risks

ESG Decision Making Framework

One of the key foundations of our business is 'Embracing ESG' in recognition that the appropriate management of ESG risks and opportunities helps us to safeguard our business, access future opportunities, unlock strategic value and create competitive advantage.

During the reporting period, the AGL Board approved an ESG Decision Making Framework, which further embeds ESG considerations into business decision making. This framework supports an enterprise-wide and consistent approach to the way ESG issues are considered in business decision making which aligns with AGL's purpose, values and policies.

The ESG Decision Making Framework is formally embedded in key governance forums such as Director and Executive decision making bodies, and also acts as a set of guiding principles to support broader consideration of ESG issues in strategic decisions. It requires the consideration of a broad range of ESG factors linked to AGL's ESG priority areas, and includes a number of ESG 'non-negotiables' – including that AGL will not knowingly undertake activities that may lead to an increased exposure to human rights and modern slavery risks. At an operational level, decision makers are required to consider whether any human rights impacts could arise from the business decision, which allows for human rights risks to be flagged, considered and addressed as a key step in the decision-making process.



4.1.1 Governance

AGL has well established roles, responsibilities, and accountabilities for the management of our modern slavery-related risks. Consistent with the FY24 reporting period, the following roles, responsibilities and accountabilities enabled the organisation to maintain proactive management of this risk throughout the reporting period.

AGL Board		
<p>The AGL Board is ultimately responsible for the governance of AGL. The Board and relevant Board Committees receive regular updates on the progress made in relation to AGL's modern slavery risk management and related initiatives. The Board's governance role includes the approval of policies relevant to the management of modern slavery and responsibility for approving AGL's Modern Slavery Statement on an annual basis.</p>		
Group Audit		
<p>AGL's Internal Audit function (Group Audit) provides independent and objective assurance to AGL on the effectiveness of governance, risk management and internal controls, and periodically provides assurance over the management of AGL's modern slavery risks.</p>		
Executive Team (ET)	Enterprise Leadership Team (ELT) (Direct reports to the ET)	
<p>Each member of AGL's ET is accountable for ensuring that their respective business area (and the business as a whole) has a sound system of risk management and internal control that aligns to AGL's Risk Management Policy. This includes risks relating to modern slavery, and the implementation of AGL's policies relating to modern slavery risk. Two members of AGL's ET (AGL's Chief Financial Officer and General Counsel & Company Secretary) are executive sponsors of AGL's modern slavery program.</p>	<p>The ELT are responsible for implementing modern slavery risk management practices and mitigations that are appropriate for the risks identified within their respective business area and that are aligned to AGL's Risk Management Policy and Risk Appetite. The ELT are further responsible for ensuring effective risk management practices are maintained within their area of responsibility.</p>	
Group Risk Compliance and Insurance (GRCI)		
<p>GRCI and its SMEs have carriage of the AGL enterprise-wide risk management function and are responsible for supporting the business to manage risks and compliance obligations, including those associated with human rights and modern slavery. GRCI is responsible for AGL's Human Rights Policy, Modern Slavery Framework, administering AGL's Modern Slavery Working Group and overseeing AGL's modern slavery work program.</p>		
Procurement	Business Unit	Modern Slavery Working Group (MSWG)
<p>AGL's Procurement team is responsible for the design and effective implementation of AGL's Procurement Policy and processes associated with the identification of modern slavery risks in AGL's supply chain.</p>	<p>Business Unit teams are responsible for the day-to-day management of human rights and modern slavery risks associated with their business unit in accordance with AGL's risk management processes. Each Business Unit is responsible for identifying, assessing and monitoring modern slavery risks and their treatment via the implementation of appropriate processes and controls.</p>	<p>The MSWG is a cross-functional group of senior business stakeholders responsible for driving the implementation of AGL's agreed modern slavery risk management initiatives to adequately manage and continuously improve our modern slavery risk profile. Membership, roles and responsibilities and the modern slavery work plan are reviewed annually or more frequently as required.</p>

Further detail on AGL's broader governance framework and risk management practices can be found in [AGL's Corporate Governance Statement 2025](#).

4. Managing our Modern Slavery Risks

4.1.2 Policies and Codes of Conduct

Ethical behaviour is central to how we do business at AGL - it is central to our purpose and values and is supported and upheld through our policies and Code of Conduct.

Throughout FY25, AGL continued to affirm our commitment to ethical behaviour and the prevention and eradication of modern slavery in our operations and supply chain via well-defined and established policies approved by AGL's Board. AGL's key policies remained consistent with those policies referenced in our FY24 Statement, and included the following:

Policies (Review Date)	Actions taken to operationalise
<p>AGL's Code of Conduct (May 2025)</p> <p>Affirms AGL's commitment to:</p> <ul style="list-style-type: none"> • play an active role in combatting modern slavery in our operations and supply chains, and to continuously review and improve AGL's approach to addressing the risks of modern slavery. • act in a manner that upholds and respects human rights – including taking steps to address modern slavery in AGL's operations and supply chains. <p>The Code requires AGL people to speak up if they suspect modern slavery or a breach of human rights in relation to AGL's operations and supply chains.</p>	<ul style="list-style-type: none"> • The Code of Conduct is included as part of AGL's Annual Compliance Training program, which is completed by all employees and key contractors as part of induction upon commencement of employment/engagement, and refreshed on an annual basis. • Throughout FY25, AGL's Ethics Panel, which comprises AGL's Chief People Officer, General Counsel & Company Secretary and General Manager Group Audit, continued to oversee the administration of the Code of Conduct. The Ethics Panel is responsible for: <ul style="list-style-type: none"> - reviewing the effectiveness of the Code and recommending any changes to the Audit & Risk Management Committee (ARMC) for endorsement and approval by the AGL Board. - putting in place procedures for the effective dissemination of, and compliance with, the Code; and - reviewing periodic reports on compliance with the Code, including any reported concerns or alleged breaches (such as those which may indicate a potential instance of modern slavery), to identify any common root causes, systemic issues or themes that require further investigation or action by management. • The Code is required to be reviewed at least every two years and is scheduled to be reviewed in May 2027.

AGL's Whistleblower Protection Policy (May 2025)

- Encourages people (both AGL and non-AGL) to raise potential misconduct, which is broadly defined and includes conduct associated with modern slavery and human rights violations (in addition to other categories of misconduct).
- Sets out the various ways concerns or grievances can be raised at AGL, (via phone, email or letter, and can be made anonymously and inside or outside of business hours).
- Notes that "Your Call" (a service available 24 hours a day, 7 days a week) has been engaged by AGL to provide external, third-party whistleblower services.
- Specifies that the Board will receive, at least quarterly, a summary of disclosures made under the policy, which includes the number and type of issues raised, how matters are being investigated (if applicable), whether those disclosures have been substantiated and the outcome. Disclosers are not identified as part of this reporting.

- The Ethics Panel continues to oversee the administration of this policy and reviews any reported concerns or alleged breaches to identify common root causes, systemic issues or themes that require further investigation or action by management.
- The policy is included in AGL's Annual Compliance Training program.
- The policy is publicly accessible on the AGL website and is supported by a dedicated [Safe to Speak Up page](#).
- Initiatives to promote our Safe to Speak Up program during FY25 included:
 - the promotion of the policy to our material suppliers, who were also encouraged to share the policy with relevant personnel and suppliers to ensure relevant stakeholders understand how to speak up about modern slavery related risks and issues that relate to AGL.
 - an article posted to our intranet site titled 'Speaking up matters: Understanding our Whistleblower Protection Policy'.
 - printed posters at our sites and corporate offices to promote the policy to our people.
 - An information and insights session was held with AGL people to present a recent high profile court case relating to whistleblowing, and to discuss how our policy is operationalised and protects whistleblowers.
 - The below image was published to digital screens across our corporate offices to promote and support our Safe to Speak Up culture.



- The policy is required to be reviewed at least every two years.

4. Managing our Modern Slavery Risks

Policies (Review Date)	Actions taken to operationalise
AGL's Human Rights Policy (December 2024)	
<ul style="list-style-type: none"> • Sets out AGL's commitment to respect the dignity and human rights of our employees, customers, suppliers and the communities in which we operate or who are affected by our operations. • Affirms AGL's commitment to: <ul style="list-style-type: none"> - uphold internationally and domestically recognised human rights standards, including those set out in the International Bill of Rights¹ and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. - conduct our business in a manner consistent with the UN Guiding Principles on Business and Human Rights and the UN Global Compact's 10 Principles. • Recognises that AGL must undertake ongoing due diligence to assess the human rights context of our activities, including the impacts we may cause and those we may contribute to or be directly linked to, and that we must adapt and improve our response in line with any changes to the risk landscape. 	<ul style="list-style-type: none"> • The policy is: <ul style="list-style-type: none"> - a key governance document in our Modern Slavery Framework. - reviewed every two 2 years and is scheduled to be reviewed in December 2026. - an external facing policy on AGL's website.
AGL's Supplier Code of Conduct (February 2024)	
<ul style="list-style-type: none"> • Sets out the minimum ESG standards of behaviour required from AGL suppliers, and explicitly defines AGL's expectations and requirements as they relate to human rights, labour practices and modern slavery. • AGL's Supplier Code of Conduct has been developed in alignment with the United Nations Global Compact principles and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work. 	<ul style="list-style-type: none"> • AGL's precedent contracts require the supplier to read, understand and be compliant with AGL's Supplier Code of Conduct. • AGL precedent contracts also provide AGL with the right to issue a supplier with a questionnaire to assess the supplier's performance compared to the requirements set out in the Supplier Code of Conduct. • In instances where supplier contracts are used, AGL negotiates the provisions of the modern slavery clause with the supplier to ensure modern slavery risk is appropriately managed by the supplier. • The Supplier Code of Conduct is an externally facing document available on the AGL website.

1. The International Bill of Human Rights includes the Universal Declaration of Human Rights, the International Covenant on Economic Social and Cultural Rights and the International Covenant on Civil and Political Rights.



4.2 Risk Management

4.2.1 Managing Modern Slavery in our Operations

As in prior years, most of the risks identified in AGL's operations relate to the management of labour. The key initiatives undertaken to manage modern slavery risks in our operations are detailed below.

Training our people

To embed an effective modern slavery risk management culture across our business, our people must have an awareness of our modern slavery risk profile and must be trained in the processes that have been developed and implemented to manage the risk. Throughout FY25 the following key events, training sessions and educational programs were delivered to build on the capability and skills of our people for the effective management of the risk in their respective business units.

Description of Initiative	Audience	Key Highlights
Business Unit Targeted Modern Slavery Training		
AGL's Modern Slavery SMEs provided targeted training to AGL teams, to ensure modern slavery risks in their respective business areas were being appropriately identified, assessed, and managed.	Various sessions were held across the business.	Training sessions were tailored for each team and where necessary addressed specific modern slavery-related risks relevant to the business area receiving the training. In addition to explaining AGL's modern slavery risk management practices, training sessions also canvassed modern slavery red flags and steps for their management.
Modern Slavery and Identifying Competition and Consumer Law Training		
Bespoke training was designed to address situations that may give rise to competition and consumer law risks when undertaking initiatives relating to modern slavery risk management. As a by-product of the training, AGL's 'Modern Slavery Compliance – guidelines for managing competition and consumer law risks' were reviewed and updated.	The training was provided to key stakeholders involved with the management of modern slavery risk. More than 85 participants attended the training session.	AGL actively engages in dialogue with third parties to share and strengthen our modern slavery risk management practices. We want our personnel to feel empowered to participate in these conversations without hesitation or concern about breaching competition laws. The training supports this ambition by allowing personnel to have a more in-depth understanding of how they can engage in these conversations while proactively managing AGL's important obligations under the <i>Competition and Consumer Act 2010 (Cth)</i> .
Annual Compliance Training		
AGL's Annual Compliance Training is designed to support the maintenance of AGL's proactive compliance culture. It supports AGL personnel to live our values by clearly outlining what is expected of all employees, including ensuring our behaviours are lawful, trustworthy, honest, inclusive, and respectful.	All AGL personnel are required to complete AGL's Annual Compliance Training. In FY25, 4010 personnel completed the training with an enterprise-wide completion rate of over 98%.	Specific to modern slavery risk management, the training referenced key policies and expectations required of AGL personnel.

4. Managing our Modern Slavery Risks

Raising awareness

Complementing this formal training, across the FY25 reporting period, multiple communication and awareness campaigns were promoted and engaged in across the business to raise awareness of modern slavery. The table below describes the key communication and awareness initiatives conducted across FY25.

Description of Initiative	Audience	Key Highlights
International Day for the Abolition of Slavery		
<p>Affirming our support for the International Day for the Abolition of Slavery.</p>	<p>As was the case in FY24, AGL launched a communication campaign targeted to all AGL personnel and to our external stakeholders on LinkedIn.</p> 	<p>We delivered the following engagement activities to affirm our support for the day:</p> <ol style="list-style-type: none"> 1. A message on digital screens across AGL's offices confirming our support for the International Day for the Abolition of Slavery. 2. An intranet article promoting our Statement and outlining: <ul style="list-style-type: none"> - the modern slavery risks across our operations and supply chain; - what AGL is doing to address these risks; - what our people can do to uphold and respect human rights. 3. A LinkedIn post recognising the important role AGL plays in respecting and upholding human rights, and our commitment to work towards the eradication of slavery.

Description of Initiative

Audience

Key Highlights

AGL's FY24 Statement

Promoting the release of AGL's FY24 Statement.

The campaign was targeted to all AGL personnel, but also shared externally on LinkedIn.

Below is the campaign message that was displayed across AGL's corporate sites to socialise AGL's FY24 Statement.



To promote our FY24 Statement, AGL engaged in the following activities:

1. An article on AGL's intranet site communicating the release of the Statement and key actions taken throughout the reporting period to improve our ability to manage the risk.
2. Messages on digital screens to promote the Statement's release, encouraging personnel to read the Statement.
3. A post on AGL's internal social media platform promoting the Statement.
4. A LinkedIn post by AGL raising awareness of the released Statement.

AGL's Whistleblower Protection Policy

Promoting our Whistleblower Protection Policy



On a quarterly basis AGL engages in a communication campaign to promote our Whistleblower Protection Policy to our personnel. Messages are shared to our digital screens to promote our Safe to Speak Up culture.

AGL recognised as a Fairtrade Supporting Workplace

In our FY23 Statement, we highlighted the panel discussion we hosted to build awareness about the risks of modern slavery across global supply chains, including our own. Our panellists included Senthil Nathan, CEO of Fairtrade ANZ, who shared insights into the impactful work Fairtrade does to empower disadvantaged artisans, workers, and farmers—particularly in developing countries—to build sustainable livelihoods.

Through the Fairtrade certification program, consumers can be confident that certified products are produced under fair working conditions and are free from child and forced labour.

Since that panel discussion, AGL has continued to engage with Fairtrade and during the reporting period achieved Fairtrade Supporting Workplace status, which underscores our commitment to ethical sourcing and human rights across our operations and supply chain.

By purchasing Fairtrade-certified products for our offices, we embed ethical procurement practices into the management of our operations, and actively promote equitable trade practices and safe working conditions.

Collaboration and Stakeholder Engagement

As outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs), business enterprises should engage in meaningful consultation with potentially affected groups and other relevant stakeholders when gauging their human rights risks. AGL proactively engages with third parties to understand our modern slavery risks and the corrective actions needed to manage these risks. During the period, AGL has:

- Engaged third party consultants who specialise in the area of human rights to provide input into the actions AGL can take to drive continuous improvement in our modern slavery risk management program;
- Engaged with Australia's Anti-Slavery Commissioner Mr Chris Evans, where AGL's Directors received a briefing about his role and provided insights as business stakeholders;
- For the second year, engaged with modern slavery survivor and human rights advocate, Moe Turaga, to share his lived experience and views on modern slavery risk management practices; and,
- Continued our long-standing engagement with the various stakeholder groups throughout the reporting period.

Australian Anti-Slavery Commissioner

AGL invited the Australian Anti-Slavery Commissioner, Mr Chris Evans to meet with our Directors for the purpose of receiving a briefing about his role, current focus areas and expectations relating to future modern slavery related regulatory reform.

AGL's Directors also used this opportunity to provide the Commissioner with some perspectives from a business stakeholder on both the positive progress prompted by modern slavery reporting requirements, and some of the challenges faced by corporations in addressing modern slavery risk – for example, in obtaining a comprehensive understanding of modern slavery risk present throughout the supply chain of many products purchased.

AGL is committed to proactively participating in the announced consultation process that is being led by the Attorney-General's Department for the purposes of strengthening the Act, and is committed to supporting the Commissioner on modern slavery risk management initiatives led by his office.

Purpose of stakeholder engagement**Outcomes to address modern slavery****Clean Energy Council's Risk of Modern Slavery Working Group (RMS Working Group)**

<p>The RMS Working Group provides Clean Energy Council members with a forum to:</p> <ul style="list-style-type: none"> • share actions and experiences in meeting the reporting requirements under the Act; and • discuss and collaborate on efforts to manage modern slavery risks within their supply chains. 	<p>As was the case in FY24, our Modern Slavery SMEs continued to participate in a special sub-group of the RMS Working Group to lead industry contributions into the development of a draft NSW Anti-slavery Code of Practice for the Renewables Value Chain.</p> <p>The Code is being developed in partnership between the Clean Energy Council and the New South Wales Anti-Slavery Commissioner.</p>
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UN Global Compact Network Australia (UNGCNA)

<p>The UN Global Compact is the world's largest corporate sustainability initiative. The UNGCNA is the Australian, business-led network of the UN Global Compact.</p> <p>The UNGCNA mobilises Australia's leading businesses to create a sustainable future and finds opportunities to impact our world for good.</p>	<p>As a member of the UNGCNA, AGL gains further insight into the risks associated with modern slavery and the proactive steps that can be taken to manage those risks. Our engagement with UNGCNA allows AGL to learn how other members are managing their modern slavery risks, and share our initiatives with the broader group. These inputs are also shared with the AGL Modern Slavery Working Group.</p> <p>Modern Slavery Community of Practice (MSCoP)</p> <p>The MSCoP is an interactive peer learning forum that supports members to discuss the challenges and opportunities facing Australian businesses with respect to the identification, management and communication of modern slavery risks. AGL's Modern Slavery SMEs participate in the MSCoP.</p> <p>The UN Global Compact Business & Human Rights Accelerator</p> <p>The UN Global Compact Business & Human Rights Accelerator is a six-month program designed to help companies move from commitment to action on human rights and labour rights by establishing an ongoing human rights due diligence process.</p> <p>As participants in the accelerator course, AGL's Modern Slavery SMEs gained valuable insights into contemporary developments in human rights. This included the opportunity to engage in expert-led training and peer-to-peer learning. The program provides the latest information on international standards, existing and emerging legislation and assists with the creation of a dynamic human rights network.</p>
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Australian Council of Superannuation Investors (ACSI)

<p>ACSI exists to provide a strong voice on financially material ESG issues. ACSI members include Australian and international asset owners and institutional investors with more than \$1.9 trillion in funds under management.</p>	<p>Throughout the reporting period, AGL engaged in discussions with ACSI to discuss modern slavery-related matters, enhancing AGL's understanding of the actions investors expect corporates to take and the disclosures investors are seeking in their proactive management of modern slavery risks.</p>
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Engaging with Survivors

AGL recognises the fundamental importance of taking a survivor first approach to our modern slavery risk management. Prioritising survivors also closely aligns with our Be Safe. Be Supportive value.

In FY24, we first invited survivor advocate Moe Turaga to share his lived experience of slavery in Australia's agricultural sector. His story heightened awareness of modern slavery's human toll and was positively received by the AGL audience, prompting a return engagement at our Loy Yang A Power Station in May 2025.

At Loy Yang, Moe addressed personnel from our operational and corporate sites, tracing his journey from enslavement to advocacy and supporting exploited workers here in Australia.

"We'd work over 60 hours a week, seven days, I never saw a pay cheque or contract," Moe said.

His story revealed the plight of some 50 million people, and gave a voice and a face to those experiencing modern slavery. His visit also reinforced the importance for our active participation in modern slavery risk management processes to protect people engaged in global supply chains and our local operations from exploitation.

AGL is proud to champion survivor leadership and empower advocates like Moe Turaga to defend the rights of those trapped in modern slavery conditions and prevent future abuses.

As a further sign of our commitment to assist survivors of modern slavery, AGL again made a donation to the Sisters of Charity Foundation to help modern slavery survivors, who partner with The Salvation Army to provide transitional housing assistance for survivors of modern slavery and human trafficking in Australia.

Third party recruitment

AGL operates in accordance with the labour laws of Australia. We uphold labour rights and recognise our moral and legal responsibility to ensure fair treatment of all workers—both within our organisation and across our business relationships. AGL has clear policies and standards that govern the recruitment of permanent employees through its internal recruitment function.

When sourcing labour with the assistance of third-party recruitment firms, AGL requires that the firms comply with AGL's policies. For example, contingent labour is sourced and paid for by a contracted third-party recruitment firm via a third-party service agreement. AGL closely monitors the performance of this third party provider, and periodically reviews their relevant modern slavery practices to ensure they comply with both the law and AGL's policies and standards. A detailed review of AGL's most material contingent labour provider is planned to be conducted in FY26.

Acquisition, investments and partnerships controls

Acquisitions, investments in, or partnerships with other organisations can expose AGL to modern slavery risks, including high-risk business models, vulnerable populations, high-risk geographies, supply chain vulnerabilities or novel modern slavery risks that require new or changed responses.

As part of transaction due diligence processes, our Modern Slavery SMEs are engaged to assist with the assessment of a potential transaction's modern slavery risks. As was the case in FY24, our SMEs throughout the reporting period reviewed and advised on third party responses to our standard modern slavery questionnaire or assessed answers to modern slavery questions tailored to the transactions they were engaged on. The assessment process informed the business stakeholder of the modern slavery risks associated with the transaction, and assisted with the identification of any immediate and longer-term actions the business may need to take in instances where the transaction is successfully completed.

Where an acquisition, investment or partnership is successfully completed, the transaction owner, in consultation with AGL's Modern Slavery SMEs, develops appropriate risk management plans to address the modern slavery risks that are specific to the transaction.

Joint Ventures and the Management of Modern Slavery Risk

Our Modern Slavery SMEs were engaged to undertake due diligence for a joint venture project in a regional area. This due diligence also provided AGL with the opportunity to engage in constructive discussions with the joint venture manager about AGL's expectations for the effective management of modern slavery risk across the joint venture project. The discussions focused on:

1. Ensuring the joint venture had the capability to put in place measures to identify, assess, and address modern slavery risks, particularly within its operations and supply chain.
2. Implementing an accessible grievance mechanism for all workers involved, including those hired through subcontractors—especially important given the regional location and the vulnerability of some workers.
3. Requiring subcontractors to operate under contracts that include a modern slavery clause requiring the proactive management of modern slavery risks across their operations and supply chain.

This engagement helped build a broader understanding of modern slavery risks within the joint venture's operations and supply chain, and helped inform the actions needed to manage those risks effectively.

4.2.2 Managing Modern Slavery Risks in our Supply Chain

AGL assesses the risks associated with engaging all new suppliers, and has embedded a modern slavery risk assessment into our sourcing processes. The table below outlines the criteria that will trigger the completion of our Sourcing Risk Checklist (SRC) before the commencement of sourcing activity. From a modern slavery risk management perspective, the SRC process directs our assessment to those suppliers who have a higher inherent risk of modern slavery.

Sourcing Risk Checklist Criteria

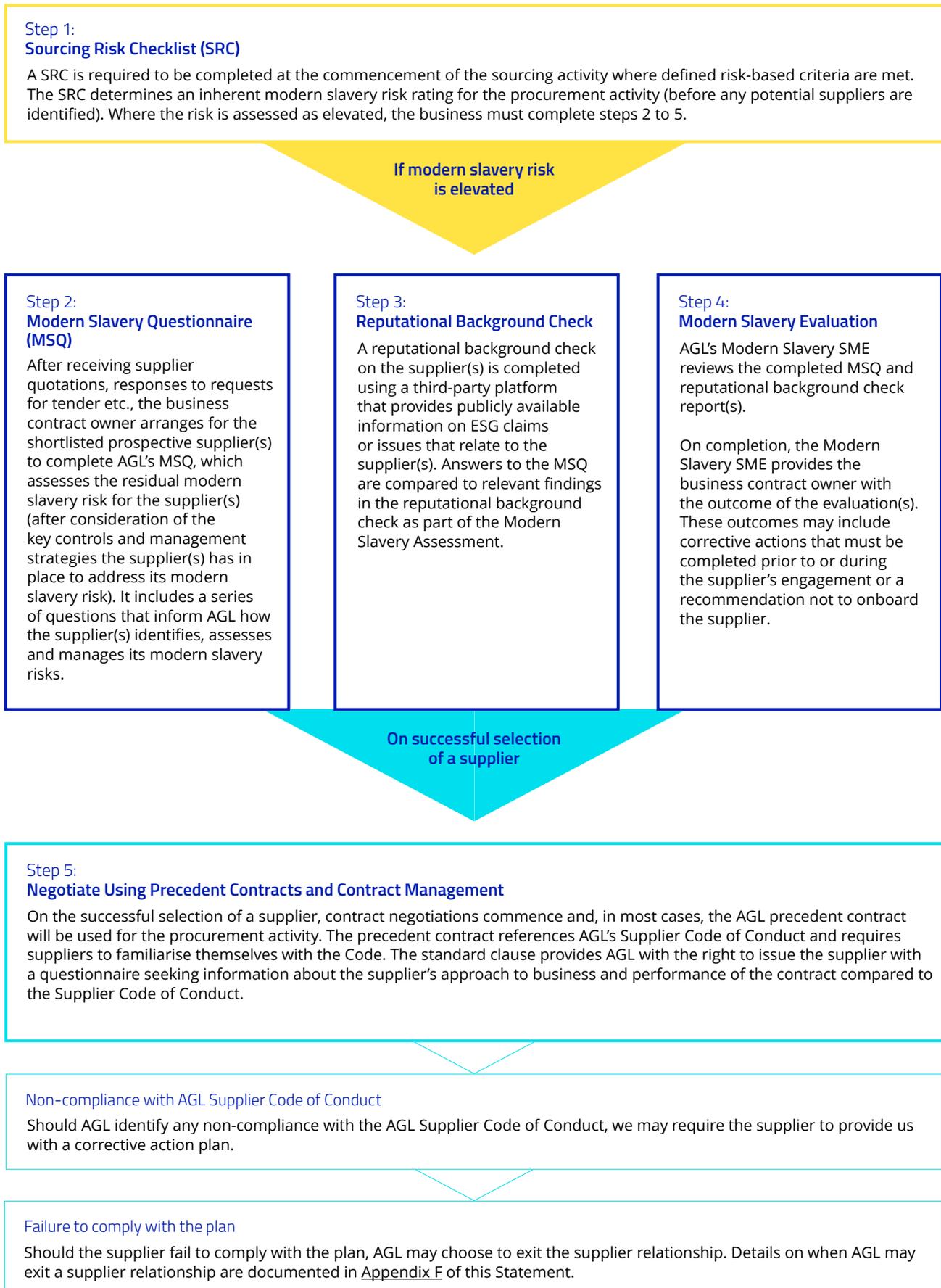
A SRC must be completed if any of the following circumstances apply:

- The supplier is new to AGL.
- The sourcing activity is over \$300,000.
- The purchase involves any of the following categories:
 - Renewable energy products;
 - Electronic devices; and/or
- The purchasing of any item which is likely to originate from a high-risk geography, high-risk sector or category, or where the purchase involves high-risk business models or vulnerable population groups.

The diagram on page 30 summarises AGL's supply chain Modern Slavery Risk Assessment Process. The risk-based process is used to determine if a third-party supplier has satisfactory modern slavery management practices in place. If the processes are deemed to be satisfactory, the supplier will be engaged for the provision of their goods and/or services.

4. Managing our Modern Slavery Risks

AGL's Modern Slavery Risk Assessment Process



During the reporting period, a new Contract Management Framework (CMF) was piloted in preparation for roll out in FY26. The CMF introduces a new, standardised approach to the management of executed contracts, which aims to reduce risk and improve oversight. From a risk management perspective the CMF ensures the business can adopt a consistent, governed and tailored contract administration approach that can flex to meet the requirements of the business or the risk profile of the supplier. The CMF provides additional guidance and assistance to AGL contract owners in the management of identified modern slavery risks.

Due diligence and management of wholesale markets counterparties

Wholesale markets transactions follow a separate due diligence process due to the nature of the activities performed, the risks associated with the activities and the need to comply with specific regulatory requirements.

Key risk management measures for counterparties and outcomes	
Risk based counterparty assessments	A risk-based approach is employed to assess new counterparties involved in the physical supply of commodities. Risks include money laundering and fraud risk, credit risk, physical risks associated with the supply and modern slavery risks.
Screening	An end-to-end due diligence tool is used to assist with the identification and assessment of any modern slavery risks associated with the counterparty.
Escalation	Any high risks identified during the onboarding process are escalated to AGL's Modern Slavery SMEs to determine whether any corrective actions are required before proceeding with the engagement of the counterparty.
Ongoing monitoring	Counterparties are continuously monitored for human rights-related enforcement activity. The due diligence system provides alerts when the risk profile of the counterparty changes. Alerts are reviewed, and where necessary, raised with the counterparty which may result in agreeing corrective actions with the counterparty or exiting the supplier relationship (see Appendix F).
FY25 outcome	No alerts required remediation action during the reporting period.

Our Modern Slavery Risk Assessment Process in Practice

AGL considered a partnership arrangement with a renewable energy products and services company (Partner) who at the time held an exclusive import and distribution agreement with a manufacturer within the renewable sector. As part of our due diligence, it was discovered that human rights allegations had been made against the manufacturer. On recognising this human rights risk and noting that AGL would be directly linked to the risk should the transaction proceed, AGL requested information from our prospective Partner for the purposes of completing a risk assessment and to determine what controls were needed to prevent, and where necessary, address the risk of modern slavery.

The due diligence assessment uncovered that whilst the prospective Partner had documented governance processes in place to manage modern slavery risks in their supply chains, those processes were immature and were not fully operationalised, leading AGL to conclude that those processes were not yet capable of addressing the risk.

After undertaking further consultation with the prospective Partner, AGL was unable to satisfy itself that the Partner would be capable of managing the risk via its commercial dealings with the manufacturer. AGL further resolved that the Partner would be unable to discharge its contractual obligations under its arrangements with AGL in so far as they related to identifying, addressing and remediating the risk of modern slavery in its supply chain. It was concluded that AGL would not proceed with the partnership arrangement.

While we were unable to proceed on this occasion, AGL is committed to continuing its engagement with suppliers within this industry, working to ensure manufacturers understand the importance of identifying and eliminating exploitative practices that are often associated with the industry.

4. Managing our Modern Slavery Risks

Modern Slavery Deep Dive and Social Audits

AGL's modern slavery risk assessment process includes enhanced due diligence measures—including supplier deep dives and/or social audits—in situations of heightened supplier risk. These are the most comprehensive components of our modern slavery risk management process and are employed where a supplier is considered to be high risk following the Modern Slavery Questionnaire (MSQ) review process, or where it has been determined that further information from a supplier is necessary to clarify and assess how the supplier is managing their modern slavery risks.

Throughout the reporting period, our deep dives and social audit processes were structured as outlined in the table below:

As part of the risk assessment process for new procurement activities

The contract owner undertaking the sourcing activity determines (in consultation with our Modern Slavery SME) that it is necessary to conduct a deep dive to further assess a supplier's modern slavery management practices to determine if the supplier is satisfactorily managing its modern slavery risks.

For existing suppliers

In addition to new sourcing activities, business contract owners may also undertake deep dives and/or a social audit at any stage of an existing supplier relationship.

For example, in situations where:

- based on the risk profile of a supplier the contract owner determines that a supplier's modern slavery risk management practices should be subject to further assessment, utilising the deep dive or social audit assessment process.
- an AGL customer requests that AGL undertake additional due diligence over a specific supply of goods.
- information relevant to the supplier's modern slavery practices (such as new publications) emerge that require further investigation.

Deep dive process

Our deep dive process involves the following steps:

1. **Review previous social audit reports** – if available, review previous social audit reports associated with the supplier's modern slavery management to identify any areas of current concern relating to modern slavery or broader labour rights issues that may need to be followed up with the supplier. This includes reviewing whether actions agreed as part of social audits previously undertaken have been closed out within an appropriate period of time.
2. **Document review** – conduct a further review of documents relating to actions taken by the supplier to assess and manage modern slavery risks. Documents may include evidence supporting actions taken to address their risks of modern slavery. The supplier's response to the MSQ will also identify relevant documents for review, which may focus on any areas of the supplier's response identified through the MSQ as potentially inconsistent with AGL's expectations.
3. **Interviews** – where necessary, conduct interview(s) with the supplier's key decision makers to better understand their actions to assess and address modern slavery risks and discuss next steps.
4. **Agree corrective action(s)** – based on the document review and interview process, assess if the supplier has appropriate modern slavery risk management practices in place, and determine if corrective actions need to be agreed with the supplier to ensure they are managing the risks in a manner that meets AGL's risk management requirements and expectations.

Deep dive outcomes

Following completion of the deep dive there are three potential outcomes:

Outcome A

The supplier is assessed as having appropriate modern slavery risk practices in place which are aligned to the risk. The engagement can proceed subject to ongoing contract monitoring processes, including monitoring requirements specific to modern slavery risk management.

Outcome B

If the supplier lacks appropriate modern slavery risk practices to manage the risk, but the gaps can be addressed:

- the contract owner works with the supplier to agree on relevant corrective actions.
- the contract owner, monitors progress of the corrective actions across the lifecycle of the engagement.
- if the supplier declines, the process escalates to Option C.

Outcome C

If the supplier lacks appropriate modern slavery risk practices and this cannot be addressed through corrective actions:

- the contract owner, in consultation with our Modern Slavery SME, decides if the engagement is to proceed (or if the engagement should be terminated in instances where the supplier has already been engaged). See [Appendix E](#).

Social audit process

The social audit process is undertaken in consultation with our Modern Slavery SMEs and involves the following steps (which may need to be repeated in instances where a follow up audit is required):

1. **Engage independent social auditor** – in engaging a credible third-party audit firm, we will consider the scope of the audit, the audit standard the supplier will be assessed against, relevant experience required to complete the audit, geographic location, the category of supplier and site type.
2. **Arrange and conduct audit** – on completion of the on-site inspection, an audit report will be prepared by the auditor and where applicable, the report will identify any non-conformances that require action by the supplier.
3. **Agree corrective actions** – once the audit report has been reviewed, corrective actions will be agreed with the supplier which address any identified non-conformances. The contract owner is responsible for ensuring that regular checkpoints are agreed with the supplier over the lifecycle of the contract for the purposes of monitoring the implementation of corrective actions.

Social audit outcomes

Following completion of the social audit there are two potential outcomes:

Outcome A

The audit finds no critical non-conformances in the supplier's modern slavery risk management. Some minor corrective actions may be required or recommended in the audit report. Corrective actions are agreed with the supplier.

Outcome B

The audit identifies material non-conformances in the supplier's risk management practices, or actual instances of modern slavery. The contract owner assesses, in conjunction with our Modern Slavery SME, whether to proceed with the supplier engagement or if the engagement should end. If the engagement proceeds, any corrective actions to address the non-conformances are agreed with the supplier in consideration of the recommendations set out in the audit report.

4. Managing our Modern Slavery Risks

Summary of FY25 Social Audit Program

43

Social audits conducted in FY25

14

Social audits conducted in FY24

74%

of audit program on Tier 2 Suppliers

100%

of audit program conducted overseas

241

non-conformances identified in FY25

119

non-conformances closed in FY25

Top 3 categories of non-conformances

Safe working conditions

60%

Excessive working hours

24%

Living/legal wages

8%

Note: all figures above are based on audit reports available at the time of drafting this Statement.

Social audits in FY25

During the reporting period, 43 social audits were conducted (compared with 14 in FY24). These were comprised of initial audits — undertaken for the first time over a supplier and where necessary, the supplier's site) — and follow-up audits, conducted to assess if non-conformances have been addressed.

In previous years, our audit program has focused on direct (tier 1) suppliers within the renewable energy supply chain. Recognising the opacity of these supply chains and our limited visibility beyond direct suppliers, approximately 74% of social audits completed in FY25 were conducted over tier 2 suppliers (the suppliers of our direct suppliers). These tier 2 suppliers are involved in services including the production of solar modules, batteries, inverters, and other solar-related components, which are considered higher risk from a social compliance perspective.

The audits revealed several opportunities for suppliers to strengthen their processes, controls, and practices. Across the reporting period, a total of 241 non-conformances were identified, with the key non-conformances being comprised of the following issues:

- 144 non-conformances related to safe and hygienic working conditions (60%);
- 58 non-conformances related to excessive working hours (24%); and,
- 19 non-conformances related to living/legal wages (8%).

Where non-conformances were identified, remediation plans and timelines were agreed upon between the auditor and supplier management. The status of these remediation efforts is periodically reviewed and discussed as part of our ongoing engagement with each supplier.

Supplier management and training

The business contract owner is responsible for managing and overseeing supplier performance under the agreed contract. This accountability ensures that suppliers continue to operate in alignment with AGL's expectations, as outlined in AGL's Supplier Code of Conduct and embedded contractual obligations including those related to modern slavery risk management. Where relevant, the business contract owner is also responsible for overseeing the implementation of any modern slavery-specific corrective actions identified during the sourcing process. Additionally, if a risk assessment conducted during sourcing indicates the need, the business contract owner may collaborate with AGL's Modern Slavery SMEs to periodically review and update the supplier's risk profile.

Our supplier management processes for suppliers in the renewables sector are also complemented by our Supplier Briefing Session. Following on from the success of our inaugural briefing session undertaken in FY24 and honouring supplier requests for the session to be run in FY25, we again invited suppliers to our renewable business to a Modern Slavery Briefing session. This approach ensured that suppliers in the renewables sector are not only aware of our expectations but are also equipped to meet them, reducing the risk of modern slavery and enhancing overall contract governance. Through this training and broader interaction, we are also able to learn from each other to continuously improve modern slavery risk management practices over time.

Modern Slavery Session		
Content	Audience	Key highlights
<p>Part One: How modern slavery is relevant to AGL and suppliers to our renewables program.</p> <p>Part Two: Managing modern slavery risks in the renewables sector.</p>	<p>As was the case in FY24, training was targeted to suppliers of solar panels, batteries and inverters.</p> <p>Approximately 40 personnel from more than 17 supplier organisations attended, with a particular focus on newly onboarded suppliers.</p>	<p>An opportunity to reinforce our proactive risk management strategy, with emphasis given to the following key items:</p> <ul style="list-style-type: none"> • highlighting expectations in our Supplier Code of Conduct in so far as they relate to human rights and modern slavery management. • modern slavery risk indicators and red flags. • principles for managing modern slavery risks. • a deep dive into the implementation of effective grievance mechanisms (see summary of discussion in the diagram below).

Why are effective grievance mechanisms important?



Identify issues before they escalate and create further harm.



Identify trends and recurring and / or systemic issues.



Help to mitigate legal and reputational risks.



Build trust and strengthen relationships with external stakeholders.

What do effective grievance mechanisms look like in practice?

Legitimate

Accessible

Predictable

Equitable

Transparent

Rights-compatible

Source of continuous learning

Based on engagement and dialogue

What do we expect our suppliers to do?



Provide workers with access to AGL's Whistleblower Protection Policy



Establish an effective grievance procedure to ensure their workers and supply chain can submit a grievance without suffering any prejudice or retaliation and without fear of disciplinary action, dismissal or discrimination

4. Managing our Modern Slavery Risks



4.3 AGL's modern slavery grievance response

AGL employs a 'survivor first' approach when receiving, investigating, and responding to an allegation or confirmed instance of modern slavery. This means the safety, dignity, and wellbeing of individuals who may have experienced modern slavery are prioritised. As an organisation, we are committed to ensuring that the actions we take—from the initial receipt of an allegation through to its investigation and resolution—are guided by principles that centre on the survivor's needs, rights, and voice.

By embedding these principles into our response framework, AGL demonstrates a deep commitment to ethical, compassionate, and survivor-centred practices in addressing modern slavery.

In FY25 our grievance response process was governed by our Investigations Framework, and supported by our Modern Slavery Investigation and Remediation Principles which operate in circumstances where AGL becomes aware of a credible allegation of modern slavery relating to our business activities or relationships, including our supply chain. The table below provides guidance on relevant key steps with a further explanation of their application set out in [Appendix E](#):

Modern Slavery Investigation and Remediation Principles	
Key Steps	Explanation
Investigation	The decision tree set out in Appendix E is employed to inform our immediate response to a concern or allegation associated with modern slavery. It provides a clear decision framework to investigate a modern slavery allegation. This includes guidance on key investigative actions that may be taken, as well as whether to engage in law enforcement.
Remediation	The key items that need to be considered when remediating an incident, a substantiated concern or an allegation associated with modern slavery. Remediating an incident may require the development of a remediation plan which in turn will require engagement with survivors (where possible) to ensure their specific needs are met (e.g. via the provision of safe accommodation or access to legal assistance).
Exiting Supplier Relationships	Key considerations when evaluating whether to exit a supplier relationship due to modern slavery concerns.



4.4 Monitoring

Our approach to managing the risks associated with modern slavery and broader human rights constantly evolves as we learn from our experience and the experiences of others, and as we refine our processes and engagement with our suppliers. To identify and prioritise improvement opportunities, we monitor the effectiveness of our existing modern slavery framework and broader modern slavery risk management practices through a number of key activities, which are summarised below.

4.4.1 Tracking and reporting

The table below sets out the mechanisms used to monitor the progress made on initiatives to manage and mitigate our modern slavery-related risks:

Tracking and reporting mechanism	Key call out
Board Audit & Risk Management Committee (ARMC) Reporting	<p>Management regularly reports material risks and compliance matters to the ARMC, including reporting on AGL's modern slavery risk management practices, improvement initiatives and risks.</p> <p>Management submits a draft of the Statement to the ARMC for its endorsement before it is considered and approved by the Board.</p> <p>A standalone modern slavery update paper was submitted to the ARMC during the reporting period to appraise and update the Committee on our modern slavery risk management processes and to summarise the role and objectives of the new Commonwealth Anti-Slavery Commissioner.</p>
Business Reporting	On a regular basis AGL's Modern Slavery SMEs provide status reporting to key leadership and the Modern Slavery Working Group on the progress made on the modern slavery management improvement initiatives being implemented throughout the reporting period.
Engagement with Business Unit Risk and Compliance Teams	Modern Slavery SMEs play an ongoing role supporting the business with modern slavery improvement initiatives, including training and awareness programs.
Engagement with the Modern Slavery Working Group	The Modern Slavery Working Group regularly discusses the changing risk landscape associated with modern slavery, and the associated initiatives in place to address modern slavery risks.
Periodic Updates to the Executive Sponsors	Management provides regular updates to the Executive Sponsors of AGL's Modern Slavery Program, which includes a broad overview of progress made throughout the reporting period.

4.4.2 Measuring Effectiveness

To support the monitoring of our modern slavery management activities, AGL has defined key indicators aligned to the elements and sub-elements of our modern slavery framework. These indicators reflect the actions and controls an organisation should have in place to effectively identify, assess, and address modern slavery risks across its operations and supply chain.

The table below provides a summary of our performance throughout FY25 against our key indicators, with further detail available in [Appendix G](#).

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	Assessment for FY25
Commitment and Governance	Roles, responsibilities and accountabilities for the management of modern slavery are clear, appropriately designed and effectively embedded to drive the management of modern slavery risk enterprise wide.	Satisfactory
	Continuous improvement is embedded into the organisation's approach to the management of modern slavery risks.	Satisfactory
	A public position is available regarding the organisation's approach to modern slavery management, approved by senior management or the Board.	Satisfactory
Risk Identification	The organisation has a formalised approach for identifying modern slavery risks which is appropriate for the organisation's context, operations and supply chains.	Satisfactory
	The organisation can describe the risks of modern slavery within its operations.	Satisfactory
	The organisation can describe the risks of modern slavery within its supply chains.	Satisfactory
Risk Management	The organisation undertakes training and capacity building of relevant personnel within the organisation on salient modern slavery risks, key policies, and standards regarding human rights and the management of modern slavery risks.	Satisfactory
	The organisation assesses modern slavery-related risks of prospective suppliers and business partners prior to engagement.	Satisfactory
	The organisation assesses and audits select suppliers to measure compliance with applicable regulations or more fully understand relevant modern slavery related risks.	Satisfactory
Grievance Response	A trusted and accessible grievance mechanism is available to all stakeholder groups (including employees, customers and suppliers) which enables the raising of modern slavery-related concerns.	Satisfactory* (previously required improvement)
	Remediation processes exist which include processes to investigate allegations of modern slavery and remediate instances of modern slavery.	Satisfactory
Monitoring	Formal reporting over the organisation's response to modern slavery is of a form and frequency that is appropriate for the organisation and accessible to intended audiences.	Satisfactory

* During the reporting period, we took steps to enhance the accessibility of our grievance mechanism. These steps are summarised in the grievance section of the table under the heading *Performance Against Modern Slavery Indicators* in [Appendix G](#).

5. Consultation

As noted in the *Engaging and consulting with entities to prepare this statement* section, this Statement is submitted as a joint statement. It applies to all brands and legal entities which form part of the AGL Group.

AGL's overarching governance structure, supported by uniform systems and processes, allows for a consistent risk management approach to be adopted across all entities within the AGL Group. This embeds an ongoing consultation approach with reporting entities throughout the development of this Statement.

Where AGL subsidiaries operate independently or partially independently of AGL's Modern Slavery Framework and associated risk management processes, a consultation process is undertaken as part of the development of this Statement with those entities. In FY25, this included consultation with OVO Energy Australia (OVO) and Evertly Pty Ltd (Evertly).

In FY24, AGL also reported on the modern slavery management risk of Energy360. Energy360 has now been fully integrated into AGL's operations, and as a result separate consultation with Energy360 is no longer relevant.

5.1 Evertly modern slavery risks and associated management

As a newly acquired entity during the FY25 reporting period without having completed a modern slavery risk assessment previously, AGL's Modern Slavery SMEs undertook a modern slavery risk identification and assessment exercise in collaboration with Evertly to better understand and articulate the modern slavery risks present within the business' operations and supply chain. This exercise aimed to evaluate existing processes and practices for managing these risks, and leveraged AGL's established risk indicators referenced in Section 3.

The assessment identified the following modern slavery risks applicable to Evertly throughout the FY25 reporting period:

Modern Slavery Risks	Key Risk Indicators	Cause, Contribute or Directly linked analysis ¹ - Illustrative Risk Scenarios
<p>Engaging labour via third parties</p> <p>Evertly engages third parties for the installation of Electric Vehicle (EV) chargers, who may subcontract parts of their service delivery. Such labour models have comparatively reduced visibility and oversight of workers, who could be subject to improper or poor labour practices.</p>	 	<p>Directly Linked: Evertly engages a third-party supplier to install EV chargers. The third-party engages in poor or unethical labour practices.</p> <p>Contribute: Evertly uses leverage to demand that a third-party EV installer delivers their services within an unrealistic timeframe, resulting in subcontractors working excessive hours to meet delivery timelines.</p>
<p>Sourcing EV chargers and other electronic goods</p> <p>Evertly sources commercial EV chargers which are typically produced overseas. The electronic manufacturing industry is considered a high-risk industry for modern slavery due to low profit margins and tiered production systems typically associated with the industry.</p> <p>Manufacturing often takes place in less developed countries with minimal legal and regulatory protections, and as a result there may be less oversight over labour rights. In addition, modern slavery risks may be present within the supply chains of these products, particularly in the sourcing of raw materials from high-risk geographies.</p>	 	<p>Directly Linked: Evertly sources EV chargers with components or materials manufactured by third party suppliers involved in high-risk sectors or categories or in high-risk countries which may directly link Evertly to forced and/or child labour.</p>

1. The 'cause, contribute or directly linked' framework is explained in more detail in [Appendix C](#) of this Statement.

In the lead up to 30 June 2025, Evertly was actively engaged in the process of integrating its operational processes and procedures into AGL's broader systems and frameworks. This integration aimed to align governance, risk management, and compliance practices – including those related to modern slavery risk identification and mitigation – with AGL's established processes and standards. This work will continue in the first quarter of FY26.

Steps taken to manage the risks of modern slavery present within Evertly's operations and supply chain are detailed below:

- Following the acquisition of Evertly, all AGL policies have been adopted by Evertly, including AGL's Human Rights Policy, AGL's Whistleblower Protection Policy and AGL's Code of Conduct. Prior to the acquisition, Evertly affirmed its commitment to respecting and upholding human rights within Evertly's own Human Rights and Modern Slavery Policy.
- Following the acquisition of Evertly, all employees participated in AGL's compliance training, which references key policies and expectations required of personnel relating to modern slavery risk management.

- Every Management assessed the modern slavery risks associated with their suppliers of EV chargers by reviewing documentation relating to their modern slavery risk management practices.

In FY26, Every will be fully integrated into AGL's operations and supply chains and will therefore be subject to AGL's modern slavery risk management practices and processes.

5.2 OVO modern slavery risks and associated management

As part of our consultation with OVO the following risks were revalidated as being applicable to OVO throughout the FY25 reporting period:

Modern Slavery Risks	Key Risk Indicators	Cause, Contribute or Directly linked analysis ¹ - Illustrative Risk Scenarios
Engaging Temporary Labour		
In certain circumstances, OVO will engage temporary labour. Temporary labour may be in the form of call centre staff and on occasion professional services, such as accounting and legal services. A hybrid working model for administrative tasks may result in the use of improper labour practices.	 	<p>Directly Linked: OVO engages a third-party supplier to support its business operations. The third-party engages in poor or unethical labour practices.</p> <p>Contribute: OVO employ pricing or purchasing practices that place undue pressure on suppliers to exploit their workers, resulting in modern slavery practices in their operations.</p>
Sourcing Electronic Goods		
OVO sources electronic goods such as laptops and communication equipment for use by its workforce. The electronics manufacturing industry is a high-risk industry for modern slavery due to low profit margins and tiered production systems typically associated with the industry. Manufacturing often takes place in less developed countries with minimal legal and regulatory protections, hence there may be less oversight over labour rights. In addition, modern slavery risks may be present within the supply chains of these products, particularly in the sourcing of raw materials from high-risk geographies.	  	<p>Directly Linked: OVO sources electronic goods such as modems and laptops which include components or materials manufactured in high-risk countries which involve the use of forced and/or child labour.</p>
Renewable Certificates		
OVO purchases renewable certificates to meet its renewable energy obligations. The renewable energy industry has been assessed as high risk for modern slavery, specifically due to the risk of forced labour and/or debt bondage. These risks arise due to risks present throughout the supply chain, from the sourcing of raw materials through to manufacturing of products.		<p>Directly Linked: OVO purchases renewable certificates from third parties that engage in poor or unethical labour practices.</p>

1. The 'cause, contribute or directly linked' framework is explained in more detail in [Appendix C](#) of this Statement.

As an outcome of our consultation with OVO, it was confirmed that OVO continue to operationalise the various management mechanisms that were reported as being in place in our FY24 Statement. These include:

- AGL's Human Rights Policy applies to OVO and affirms its commitment to respect the human rights of its employees, customers and suppliers. In addition, AGL's Whistleblower Protection Policy applies to OVO enabling personnel to raise concerns relating to human rights violations or modern slavery.
- Senior management oversee its policies and standards, including policies associated with modern slavery management. In addition, OVO's Head of Legal & Compliance, with support from key business stakeholders, undertakes due diligence at the time of engaging third parties to ensure OVO is not engaging in any conduct which is not aligned with applicable laws and its internal policies, including human rights laws and AGL's Human Rights Policy.
- AGL's Code of Conduct affirms OVO's commitment to act in a way that preserves human rights, including taking steps to prevent modern slavery in OVO's operations and supply chains. Formal training on the Code of Conduct is completed annually by all OVO personnel. All new OVO personnel are required to undertake training on AGL's Code of Conduct.
- Continuing to operationalise its Third-Party Management Policy, which outlines due diligence processes to be undertaken before entering a contract with a third-party vendor. This policy also requires that third parties notify OVO of any compliance breaches identified, including those relating to human rights law.

As we progress into FY26, OVO remains committed to managing its modern slavery risk in accordance with these mechanisms, with the view of identifying any modern slavery risk areas across its operations and supply chain that require further investigation to ensure this risk is appropriately managed, and where necessary, mitigated by appropriate controls.

Appendices

Appendix A: Our Structure, Operations and Supply Chains

Our structure and Operating Segments

The principal activities of AGL throughout the reporting period remained consistent with our FY24 Statement, and comprised the operation of energy businesses and investments, including electricity generation and storage, gas storage, the sale of electricity and gas to residential businesses and wholesale customers, and the retailing of broadband and mobile services. Further detail on AGL's structure and operations can be found within the Annual Report and on AGL's website.

Operating segments

AGL manages its business in three key operating segments:

- **Customer Markets** comprises the Consumer and Large Business customer portfolios responsible for the retailing of electricity, gas, broadband/mobile/voice, solar and energy efficiency products and services to residential, small and large business customers. Customer Markets sources its energy from Integrated Energy at transfer prices that reflect wholesale energy costs in each state, along with energy provided by rooftop solar. Customer Markets also includes sales, marketing, brand, AGL's customer contact and call centre operations, and AGL's electrification and innovation growth areas.
- **Integrated Energy** operates AGL's power generation portfolio and other key assets, including coal, gas, wind and hydro generation facilities, grid-scale batteries, natural gas storage facilities, and development projects. Integrated Energy runs a large trading operation that manages price risk associated with procuring electricity and gas for AGL's customers, manages AGL's obligations in relation to renewable energy schemes, and controls the dispatch of AGL's owned and contracted generation assets, gas offtake agreements and associated portfolio of energy hedging products.
- **Investments** comprises AGL's interests in the ActewAGL Retail Partnership, Tilt Renewables and other investments.

Subsidiaries and Acquisitions

As of 30 June 2025, AGL has two fully owned subsidiaries which do not fully operate within AGL's standard management processes, OVO Energy Pty Ltd and Every Pty Ltd.

Whilst both maintain some processes outside of AGL's standard processes, AGL continues to maintain management oversight and control over both subsidiaries. The structure, operations and supply chains for OVO and Every are contained in [Appendix E](#).

4.56 million

total services to customers

4,483

number of employees (headcount)

4,434

number of employees (FTE)

37%

of employees covered by Enterprise Agreement



Legend

- Operated by AGL
- Under construction/commissioning
- Contracted use or interest
- Gas-fired
- Coal-fired
- Wind
- Solar
- Hydro
- Grid-scale battery
- Gas storage
- Mine
- Decommissioned

^Δ Assets owned by Tilt Renewables.
^{*} Projects funded / owned by other parties. Sunraysia Solar Plant 50% contracted generation to AGL.
 Map reflects assets as at 14 August 2024. Generation assets operated or contracted by AGL which have an installed capacity of less than 50 MW are not shown on this map.

Appendices

Our Supply Chain

AGL has a large and diverse supply chain consisting of over 5000 suppliers that enable the supply of goods and services to our customers and the delivery of our strategic objectives. Over the course of FY25, AGL's procurement spend totalled approximately \$2.59 billion. Key categories of spend included operations and facilities construction, repair and maintenance (approximately 30%), IT and telecommunication services (approximately 13%), engineering services (approximately 4%), and contingent labour and professional services (approximately 2%).

Wholesale markets

In addition to AGL's procurement spend, we also source energy-related products for our customers and operations, which we refer to as our 'wholesale markets' supply chain. In FY25, AGL's spend on electricity, gas and other fuel, renewable certificates, and other contractual relationships with third parties to manage pricing risks totalled approximately \$1.5 billion.

In FY25, AGL's wholesale markets supply chain included the following key types of supply arrangements:

- electricity supplied to our domestic and commercial customers predominantly purchased from the Australian Energy Market Operator (AEMO). AEMO is a legislated body that manages the electricity and gas systems and markets across Australia.
- gas and other fuel for generation, including coal, purchased from upstream producers or other wholesalers, with additional contracting of required transportation and transmission services to deliver to AGL's generation sites or customers.
- investments for the development of new renewable generation, which involve entering long-term contracts, known as Power Purchase Agreements (PPA), for the offtake of electricity and renewable certificates from these projects.
- renewable certificates purchased from producers through standalone contracts or PPAs.
- certified carbon offsets, also known as carbon credits, purchased from projects that reduce, remove or capture emissions from the atmosphere. AGL procures these offsets to support AGL's Carbon Neutral program that is offered to our customers.

AGL maintains these contractual relationships with counterparties to manage price risk.

International procurement spend

AGL recognises that the location of our suppliers plays a major role in driving the inherent risk of modern slavery in our supply chain. Approximately 3% of AGL's FY25 procurement spend was associated with international suppliers. The map in Section [1.1](#) provides further details on AGL's international spend.

Appendix B: Data Analytics and Assessment of AGL's Supply Chain

AGL engaged an independent third-party consultant to conduct an inherent modern slavery risk assessment of direct suppliers used throughout the course of the reporting period to further our understanding of the modern slavery risks inherent within our supply chain.

The objectives of this assessment were to:

1. confirm the completeness of AGL's modern slavery risk profile by analysing our direct supply chain; and
2. obtain an increased understanding of the salient risks which exist in our supply chain.

Assessment methodology

The data analytics involved the following key steps:

1. Spend data associated with direct suppliers for the period 1 July 2024 through to 31 March 2025 was extracted and analysed.
2. Each supplier was assigned a geographic location¹ (using supplier country) and an industry code².
3. A proprietary supplier assessment methodology was applied to the spend data to assess the inherent modern slavery risk of each supplier. This assessment considered the supplier's industry, in addition to identified geographic and industry controversy risks across three modern slavery risk factors: forced labour, child labour and human trafficking. Each element (industry, geographic location, and industry controversy) was assigned a weighting to determine a cumulative risk score for each supplier (ranging from low to high risk).

Overview and key insight into our modern slavery risk profile

The assessment of individual suppliers across 116 industries resulted in the following key findings:

- As was the case in FY24, most procurement spend (more than 89%) is attributed to suppliers with an inherent modern slavery risk of medium or lower.
- AGL's highest inherent risk of modern slavery within our supply chain remains with suppliers associated with the solar panel manufacturing industry. The data analysis identified that AGL suppliers within this industry operate across five different countries, although those with the highest forced labour risk include China, Vietnam and Thailand. The analysis also found that suppliers in this sector are exposed to a high inherent risk of forced labour, a medium to high inherent risk of human trafficking, and a low to medium inherent risk of child labour.
- A review of the outcomes of this assessment confirms that our risk profile captures the salient modern slavery risks that are material to our operations and supply chain.

Appendix C: Leveraging the United Nations Guiding Principles (UNGPs) to identify and manage our modern slavery risk exposure

AGL considers the UNGPs on Business and Human Rights to better understand the potential for our involvement in an adverse human rights impact, including modern slavery, and to determine appropriate next steps based on the level of any involvement that we may have.

In accordance with the commitments set out in our Human Rights Policy and based on the principles set out in the UNGPs, we have a responsibility to:

1. avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur; and
2. seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products, or services via our business relationships, even if we have not contributed to those impacts.

As was the case in FY24, AGL's risk assessment process confirms that it is more likely that AGL is directly linked to modern slavery (rather than causing or contributing to modern slavery practices through our operations and supply chain). AGL's potential for direct linkage to modern slavery risks and practices is summarised in the tables in Sections [3.1](#) and [3.2](#).

CAUSE – a business may cause an adverse human rights impact if its actions directly result in modern slavery. For example, modern slavery is caused by a company when the company uses child labour to perform hazardous tasks.

CONTRIBUTE – a business may contribute to an adverse human rights impact if its actions are conducive to modern slavery (but do not directly cause the modern slavery). For example, requiring the manufacturing of goods in an unreasonable timeframe may result in worker exploitation, as a subcontractor may be pressured to exploit workers to meet these requirements.

DIRECTLY LINKED – a business may be directly linked to modern slavery through its business relationships, such as a supplier, even if it did not cause or contribute to the harm. For example, a company may purchase goods or services from a supplier that causes or contributes to modern slavery conditions.

1. It is likely that Australia is overrepresented in AGL's procurement data based on local supplier billing addresses (e.g. country data is primarily based on direct billing addresses and may not capture a supplier's operations and product manufacture of origin). This was manually adjusted for select solar suppliers based on the solar deep dive investigative work undertaken in the previous reporting period.

2. Industry classification codes are the Global Industry Classification (GICS) and the Australian and New Zealand Standard Industrial Classification.

Appendices

Appendix D: Reporting Entities

The following AGL subsidiaries are reporting entities in their own right, having met the reporting threshold under the Act in FY25:

- AGL Electricity (VIC) Pty Ltd
- OVO Energy Pty Ltd
- Victorian Energy Pty Limited
- AGL Sales Pty Limited
- AGL South Australia Pty Limited
- SEGH Pty Ltd
- Sustainable Business Energy Solutions Pty Ltd
- AGL Generation Holdco Pty Ltd
- AGL Loy Yang Pty Ltd
- AGL Loy Yang Partnership
- AGL Hydro Partnership
- AGL Macquarie Pty Limited
- AGL Retail Energy Limited
- AGL Wholesale Gas Limited
- Perth Energy Holdings Pty Ltd
- Perth Energy Pty Ltd
- Southern Phone Company Limited

Appendix E: OVO and Evertly Structure, Operations and Supply Chains

The structure, operations and supply chain of OVO and Evertly are summarised below.

Structure, Operations and Supply Chain – OVO

OVO continues to retail electricity to residential customers in New South Wales, Queensland, South Australia and Victoria, and as at 30 June 2025, OVO has 16 employees who are all based in Melbourne.

Since becoming a fully owned subsidiary in FY24, OVO has further integrated its business operations into AGL, leveraging AGL's existing operational infrastructure and supply partnerships where possible.

This has resulted in the following changes to OVO's operations and supply chains during the FY25 reporting period:

- OVO's contact centre and operational staff are employed directly by AGL and operate under AGL's policies and procedures. This ensures consistent application of our standards, including those relating to labour rights, compliance and ethical conduct.
- OVO no longer participates in the wholesale electricity market and instead receives a transfer price from AGL to service OVO's customers.
- In leveraging AGL's supplier partnerships, engagement with direct suppliers decreased from 120 in FY24 to 109 in FY25. Despite this reduction, addressable spend increased to \$188 million—representing a 70% increase compared to the previous reporting period which has been driven by customer growth.

These operational and supply chain changes have resulted in reduced risk and changes to OVO's key categories of spend. For the FY25 period, key categories of expenditure included network tariffs charged by distributors, labour charges and IT services (including software) compared to wholesale electricity expenses, network tariffs, labour charges, and IT services (including software) in FY24. The majority of OVO's addressable spend was to Australian-based suppliers (although some of these are subsidiaries of foreign owned entities). OVO's supply chain also includes the procurement of energy and energy-related products for its customers and operations.

Structure, operations and supply chain - Evertly

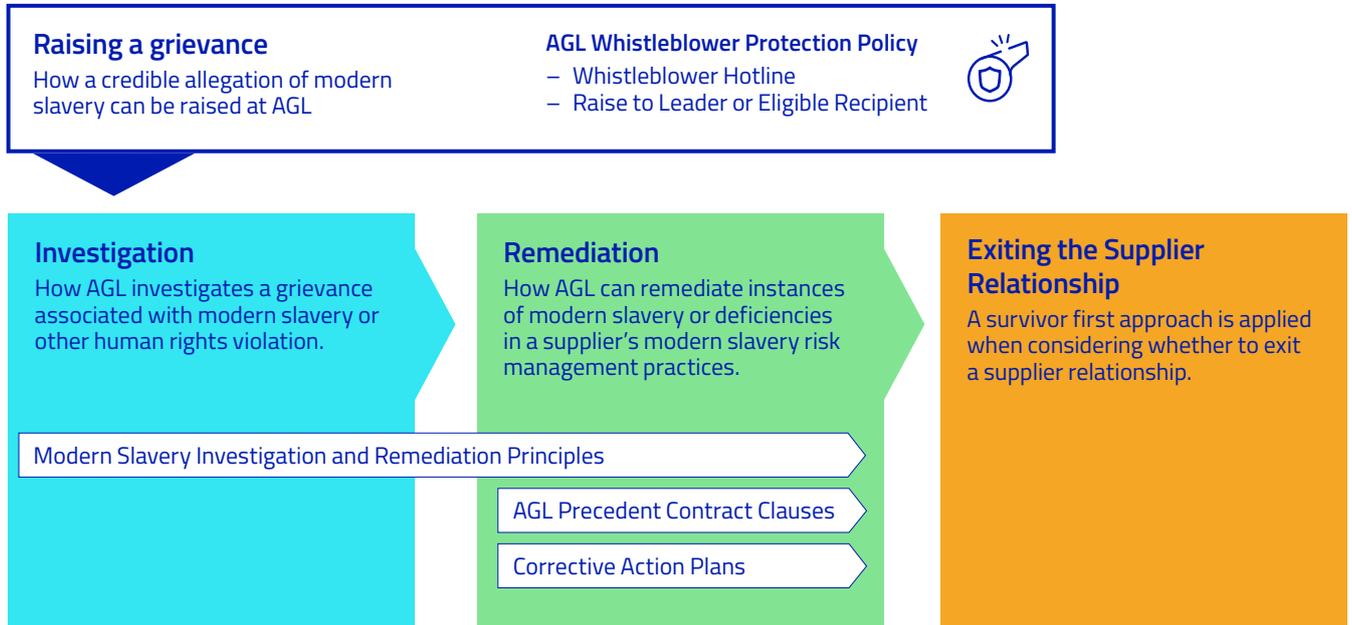
In FY25, AGL acquired 100% of Australian company Evertly Pty Ltd, a provider of end-to-end EV charging solutions for residential and commercial applications.

Evertly primarily operates as an EV software platform provider that delivers comprehensive, full-service charging and energy management solutions for electric vehicles. The platform offers energy management, charging and installation services to commercial clients including property groups, fleet operators, public parking providers, and landlords.

Evertly services customers across Australia, with its team based in Sydney. In FY25, Evertly's supply chain included five direct suppliers who provide Evertly with commercial EV charges and services for the installation of EV charges. Procurement spend during the FY25 period totalled over \$275,000, of which approximately \$52,000 was spent after joining AGL in January 2025. All software development is conducted in-house by Evertly employees.

Appendix F: Modern Slavery Investigation and Remediation Principles

AGL's Modern Slavery Investigation and Remediation Principles act as a guide only and are complementary to AGL's existing policies and frameworks, including our Whistleblower Protection Policy and Human Rights Policy. The diagram below provides a summary of how the Principles interact with our existing processes and procedures that are responsive to an allegation of modern slavery.



Investigation

The decision tree in the diagram below is used to guide AGL's response to investigating a concern or allegation associated with modern slavery. The decision tree is supported by our remediation process, inclusive of those matters that need to be considered if we need to exit a supplier relationship.

If an AGL business unit becomes aware of a modern slavery concern or allegation*, the matter will be escalated to Group Risk Compliance and Insurance (GRCI).

The business unit in consultation with GRCI will conduct an initial assessment to determine next steps:

Conducting an Initial Assessment

When AGL becomes aware of a concern or allegation, an initial assessment will be undertaken to determine if the matter will need to be investigated. The following items are considered when undertaking the initial assessment:

- Determine if any immediate steps need to be taken to address any immediate harm to those involved;
- Resolve if there is a requirement to keep the discloser's identity protected and assess what steps need to be undertaken to ensure confidentiality is maintained (e.g. consider the relevant application of AGL's Whistleblower Protection Policy); and,
- Invite the discloser to provide AGL with further information if it is safe and appropriate to do so.

The initial assessment may result in any of the three possible outcomes being applied:

No further action required. The concern or allegation (such as a media report) does not relate to AGL's operations or supply chain or does not include sufficient information to warrant an investigation.

Further action to monitor the supplier required but the concern or allegation does not reach the threshold for modern slavery (for example, cleaning workers are allegedly accidentally underpaid). After further monitoring the allegation may be reclassified.

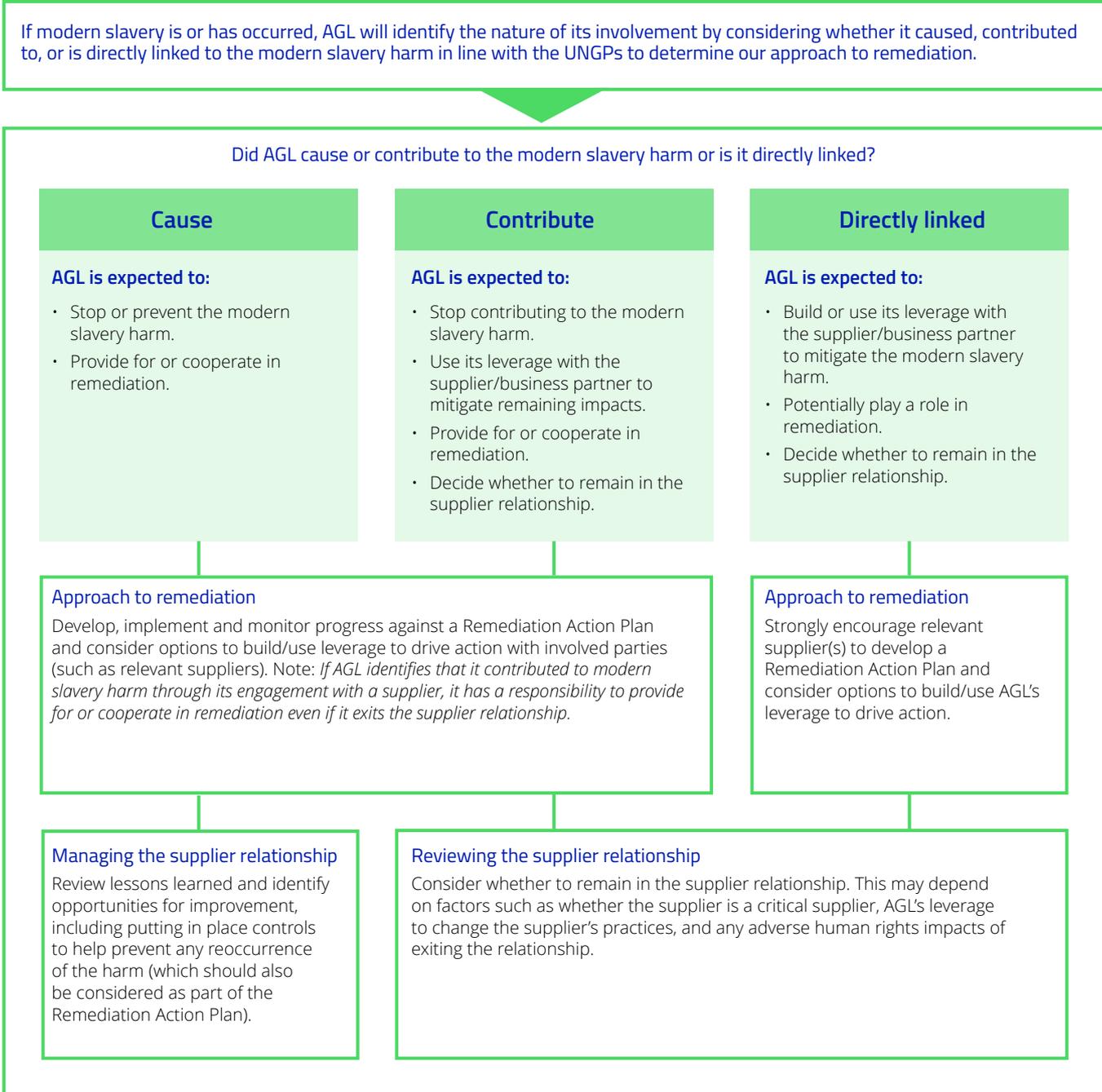
Investigation required. The allegation reaches the threshold for modern slavery and relates to AGL's operations or supply chains.

* If the allegation constitutes a protected disclosure under AGL's Whistleblower Protection Policy, the requirements of the Whistleblower Protection Policy will be adhered to.

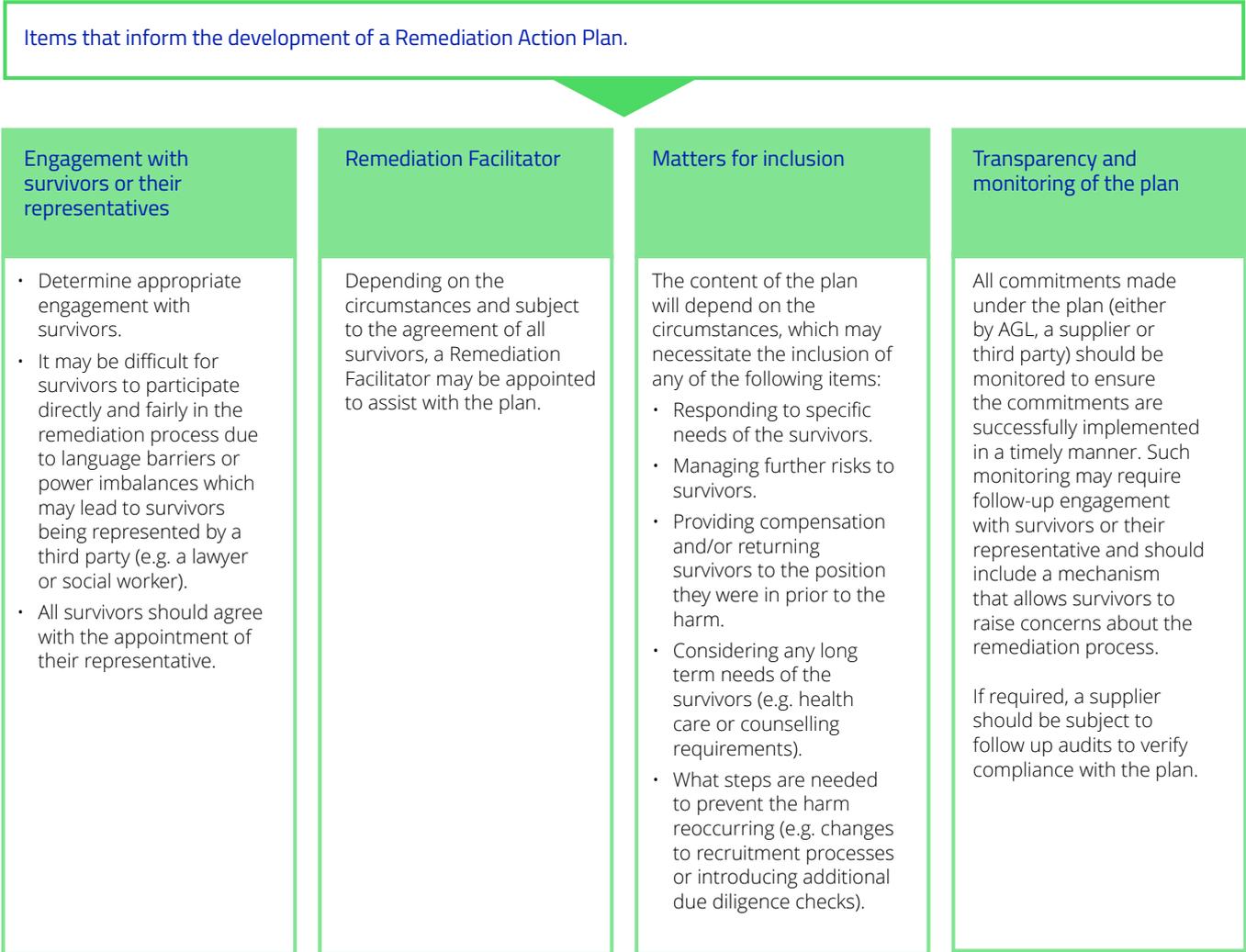
Appendices

Remediation

As outlined in our FY24 Statement, our approach to remediation depends on the nature and extent of our involvement in the modern slavery incident based on the 'cause, contribute, directly linked' continuum of involvement set out in the UNGPs. The diagram below provides guidance on the remedial steps that will be taken if AGL is involved in a modern slavery incident.



The items set out in the diagram below inform AGL's development of a Remediation Action Plan in its sole capacity or in collaboration with a supplier and/or relevant third party.



Appendices

Exiting a Supplier Relationship

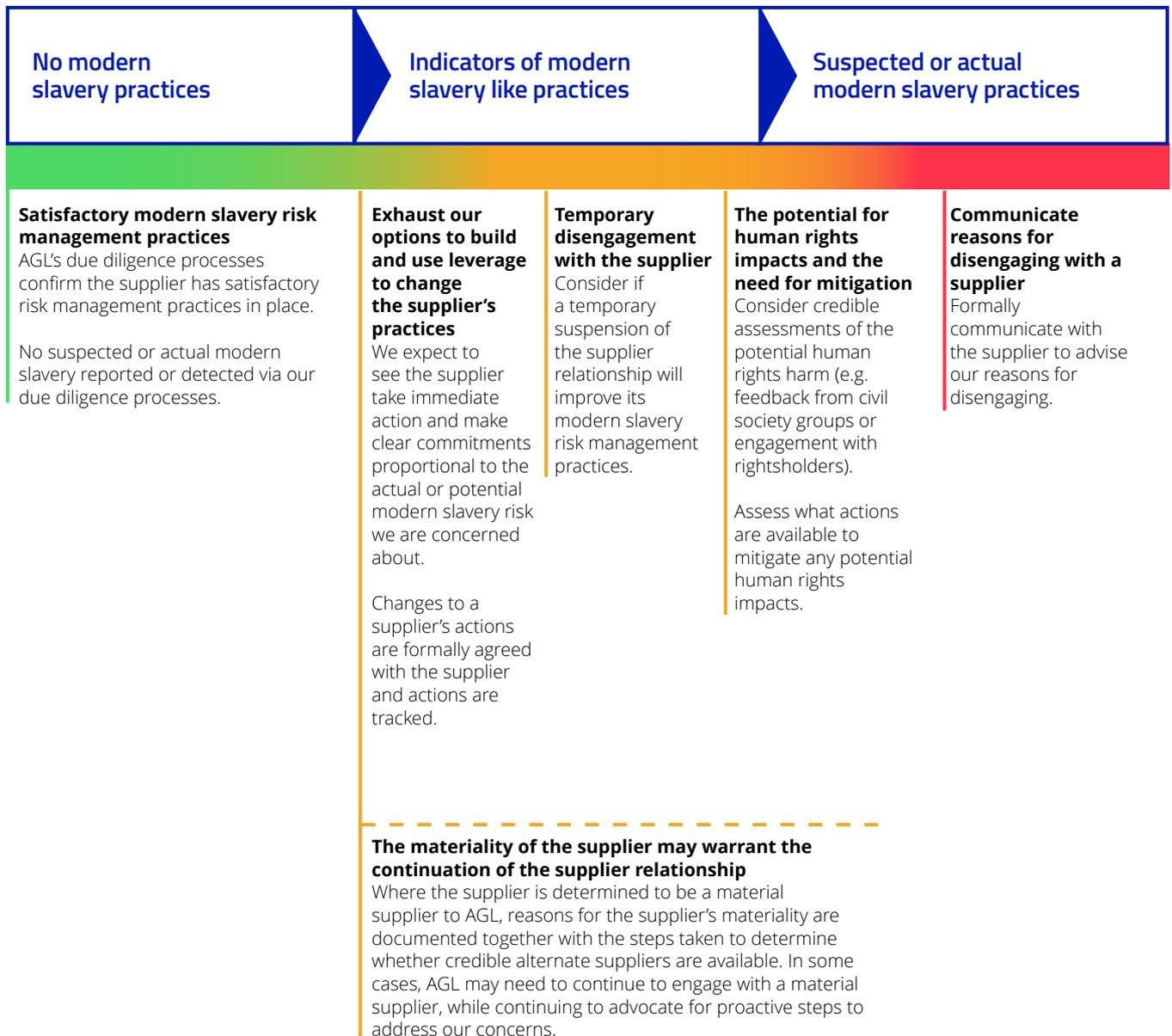
Deciding to exit a supplier relationship is a significant and complex decision that we will only make after all reasonable efforts to remediate and prevent the recurrence of modern slavery or other human rights harms have been thoroughly explored.

Where a decision is made to disengage from a supplier due to modern slavery concerns, AGL is committed to doing so in a responsible manner. This may include taking steps to remediate any harm caused in line with our remediation approach.

Situations that may warrant exiting a supplier relationship include instances where:

- There is a direct link between AGL and modern slavery practices through a supplier, and the supplier is unwilling to take meaningful action to improve its practices or remediate its impacts.
- All feasible options to build and use leverage to influence the supplier's behaviour have been exhausted.

If an exit is being considered, AGL will assess the factors outlined in the diagram below. These considerations address both the decision to exit and the need to manage any consequences that may arise post-exit.



Appendix G: Performance against Modern Slavery Indicators

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	How AGL measures effectiveness against this indicator	Assessment for FY25
Commitment and Governance	Roles, responsibilities and accountabilities for the management of modern slavery are clear, appropriately designed and effectively embedded to drive the management of modern slavery risk enterprise wide.	The roles, responsibilities and accountabilities associated with the management of risk, including modern slavery risks, are documented in AGL's Board and ARMC Charters (which are reviewed annually), and AGL's Risk Management Policy and Human Rights Policy, (which are reviewed every two years).	<p>Satisfactory – AGL's Board and ARMC Charters, and Human Rights Policy and Risk Management Policy, continued to be operational and successfully embedded throughout the reporting period. The Charters and policies were reviewed and updated throughout the reporting period, in alignment with our standard review cycles.</p> <p>Training and awareness programs conducted throughout the reporting period have supported personnel in having a clear understanding of the roles and responsibilities involved in AGL's modern slavery risk management process.</p> <p>Further details are provided in Section 4.1 of this Statement.</p>
	Continuous improvement is embedded into the organisation's approach to the management of modern slavery risks.	AGL seeks periodic review of its Modern Slavery Framework by an independent party, including benchmarking of AGL's processes against better practice and peers.	<p>Satisfactory – whilst no formal review of AGL's Framework was completed in the reporting period, AGL engaged with third-party subject matter experts to test our existing approaches and provide advice in the area of human rights relating to enterprise program initiatives; development of training and awareness material; international modern slavery management trends and practices; proposed amendments to the Modern Slavery Act; and updates to our Human Rights Policy.</p>
	A public position is available regarding the organisation's approach to modern slavery management, approved by senior management or the Board.	AGL policies relevant to the management of modern slavery are reviewed and approved by the AGL Board at least every two years. The review of policies includes an assessment of internal and external factors (such as industry trends) and internationally recognised standards, to ensure AGL's modern slavery position continues to meet stakeholder expectations and aligns with AGL's values.	<p>Satisfactory – the following Board approved policies which articulate AGL's approach to modern slavery management (most recently updated in FY25) remained publicly available on AGL's website:</p> <ul style="list-style-type: none"> • AGL's Human Rights Policy, • AGL's Code of Conduct, and • AGL's Whistleblower Protection Policy. <p>These policies will be subject to a further review by FY27.</p> <p>Further details are provided in Section 4.1.2 of this Statement.</p>
Risk Identification	The organisation has a formalised approach for identifying modern slavery risks which is appropriate for the organisation's context, operations and supply chains.	AGL's risk identification methodology and key risk indicators are regularly reviewed to validate that they remain fit for purpose and appropriate for AGL's context, operations and supply chains.	<p>Satisfactory – during the reporting period, AGL's key indicators were assessed and determined to remain appropriate for its business context, operations and supply chains.</p> <p>AGL's Board considered AGL's enterprise risk management framework and concluded that the framework was designed and operating effectively.</p> <p>GRCI initiated a modern slavery risk assessment process in collaboration with key business units to support the documentation and update of potential causes and consequences associated with their modern slavery risks.</p> <p>Further details are provided in Section 3 of this Statement.</p>

Appendices

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	How AGL measures effectiveness against this indicator	Assessment for FY25
Risk Identification (continued)	The organisation can describe the risks of modern slavery within its operations.	AGL conducts an annual enterprise-wide review of its modern slavery risk profile to validate the modern slavery risks within its operations, and update these as required. AGL reviews publicly available publications which inform the evolution of its modern slavery risk analysis over time.	Satisfactory – AGL conducted a review of its modern slavery risk profile in FY25. The material modern slavery risks identified within its operations are set out in Section 3.1 of this Statement. Modern slavery risks associated with AGL's owned and controlled entities, and their management, are documented in Section 5 of this Statement.
	The organisation can describe the risks of modern slavery within its supply chains.	AGL regularly reviews its supply chain for modern slavery-related risks, and conducts an annual enterprise-wide review of its modern slavery risk profile to validate the modern slavery risks identified within its supply chains, and updates these as necessary. AGL reviews publicly available publications which inform the evolution of its modern slavery risk analysis over time.	Satisfactory – AGL conducted its annual review of its modern slavery risk profile in FY25 and the modern slavery risks identified within its supply chain are set out in Section 3.2 of this Statement. Modern slavery risks associated with AGL's owned and controlled entities, and their management are documented in Section 5 of this Statement.
Risk Management	The organisation undertakes training and capacity building of relevant personnel within the organisation on salient modern slavery risks, key policies, and standards regarding human rights and the management of modern slavery risks.	<ul style="list-style-type: none"> AGL's Modern Slavery SMEs facilitate modern slavery training, and identify key gaps in knowledge of relevant personnel, considering feedback from training previously delivered. AGL monitors the percentage of employees who have completed mandatory training on AGL's Code of Conduct. The training references an expectation that our personnel are to speak up if they suspect modern slavery or a breach of human rights in relation to our operations and supply chains. The training outlines that this can be done via the process outlined in AGL's Whistleblower Protection Policy. 	Satisfactory – as documented in Section 4.2.1 of this Statement, AGL's Modern Slavery SMEs facilitated training sessions, including the Modern Slavery Supplier Briefing Session, to high-risk suppliers. In FY25, over 98% of the organisation completed compliance training on AGL's Code of Conduct which addresses modern slavery risk management.
	The organisation assesses modern slavery-related risks of prospective suppliers and business partners prior to engagement.	AGL performs a risk-based assessment of the modern slavery risks relevant to prospective and new suppliers.	Satisfactory – in FY25, AGL made further enhancements to its procurement processes, which included the implementation of a Contract Management Framework, which is summarised in Section 4.2.2 of this Statement.
	The organisation assesses and audits select suppliers to measure compliance with applicable regulations or more fully understand relevant modern slavery related risks.	<ul style="list-style-type: none"> AGL monitors the number of supplier audits completed. AGL monitors the completion of corrective actions arising from audits performed. AGL engages its third-party auditors to scope further audit opportunities over its high-risk suppliers. 	Satisfactory – During FY25, AGL conducted 43 supplier social audits, (compared to 14 in FY24). AGL will continue to expand its targeted social audit program throughout FY26.

Element of AGL's Modern Slavery Framework	Indicator of effective modern slavery management	How AGL measures effectiveness against this indicator	Assessment for FY25
Grievance Response	A trusted and accessible grievance mechanism is available to all stakeholder groups (including employees, customers and suppliers) which enables the raising of modern slavery-related concerns.	<ul style="list-style-type: none"> AGL periodically reviews its grievance mechanism to assess its effectiveness. AGL's FY25 Listening Survey assessed whether employees feel safe to speak up if they have concerns. 	<p>Satisfactory – In FY24 the status for this indicator was 'room for improvement'.</p> <p>Throughout the reporting period steps were taken to improve the accessibility of our grievance mechanism:</p> <ul style="list-style-type: none"> Accessibility of our external third-party whistleblower services was improved with the development and socialisation of a QR Code (see below). A person can scan the code and follow the prompts for the purposes of making a complaint. The QR code was included in our Supplier Briefing training, which incorporated a dedicated section for the promotion of our grievance mechanism. Work commenced on updates to our contract precedents to provide improved promotion and accessibility to our grievance mechanism. <p>Our Whistleblower Protection Policy was updated, which now includes the QR Code.</p> <div data-bbox="1013 1003 1241 1234" style="text-align: center;">  </div> <p>Results from AGL's FY25 Listening Survey identified a further uplift in employees feeling safe to speak up.</p>
	Remediation processes exist which include processes to investigate allegations of modern slavery and remediate instances of modern slavery.	AGL assesses the effectiveness of remediation processes against recognised standards and best practice, such as the criteria set out in the UNGPs.	<p>Satisfactory – Our Modern Slavery Remediation Principles are available on our Modern Slavery intranet site.</p> <p>Further details can be found in Appendix F of this Statement.</p>
Monitoring	Formal reporting over the organisation's response to modern slavery is of a form and frequency that is appropriate for the organisation and accessible to intended audiences.	AGL obtains feedback from independent third-party consultants on its Statement annually to identify improvement opportunities with our reporting.	<p>Satisfactory – AGL received feedback from external third parties on its FY24 Statement.</p>

Appendices

Appendix H: Mandatory Reporting Criteria

This Statement meets the mandatory reporting requirements set out under the Act. The table below outlines the sections in this Statement that specifically address the criteria contained within the Act.

Section of the Act	Mandatory reporting criteria	Section(s) in this Statement	Page Reference
16(1)(a)	Identify the reporting entity	Approach to Reporting	2
		Appendix D	44
16(1)(b)	Describe the reporting entity's structure, operations and supply chains	Appendix A	40
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3.1	12
		Section 3.2	13
		Section 5.1	38
		Section 5.2	39
16(1)(d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 4.2.1	23
		Section 4.2.2	29
		Section 5.1	38
		Section 5.2	39
16(1)(e)	Describe how the reporting entity assesses the effectiveness of these actions	Appendix G	49
16(1)(f)	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe the consultation with the entity giving the statement)	Section 5	38
16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 2	10
		Section 4.1	17
		Section 4.3	36
		Section 4.4	36



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