

Specialists in Metering Intelligence



MODERN SLAVERY STATEMENT





THIS STATEMENT
ADDRESSES THE PERIOD
FROM JULY 1, 2020, TO
MARCH 31, 2021.

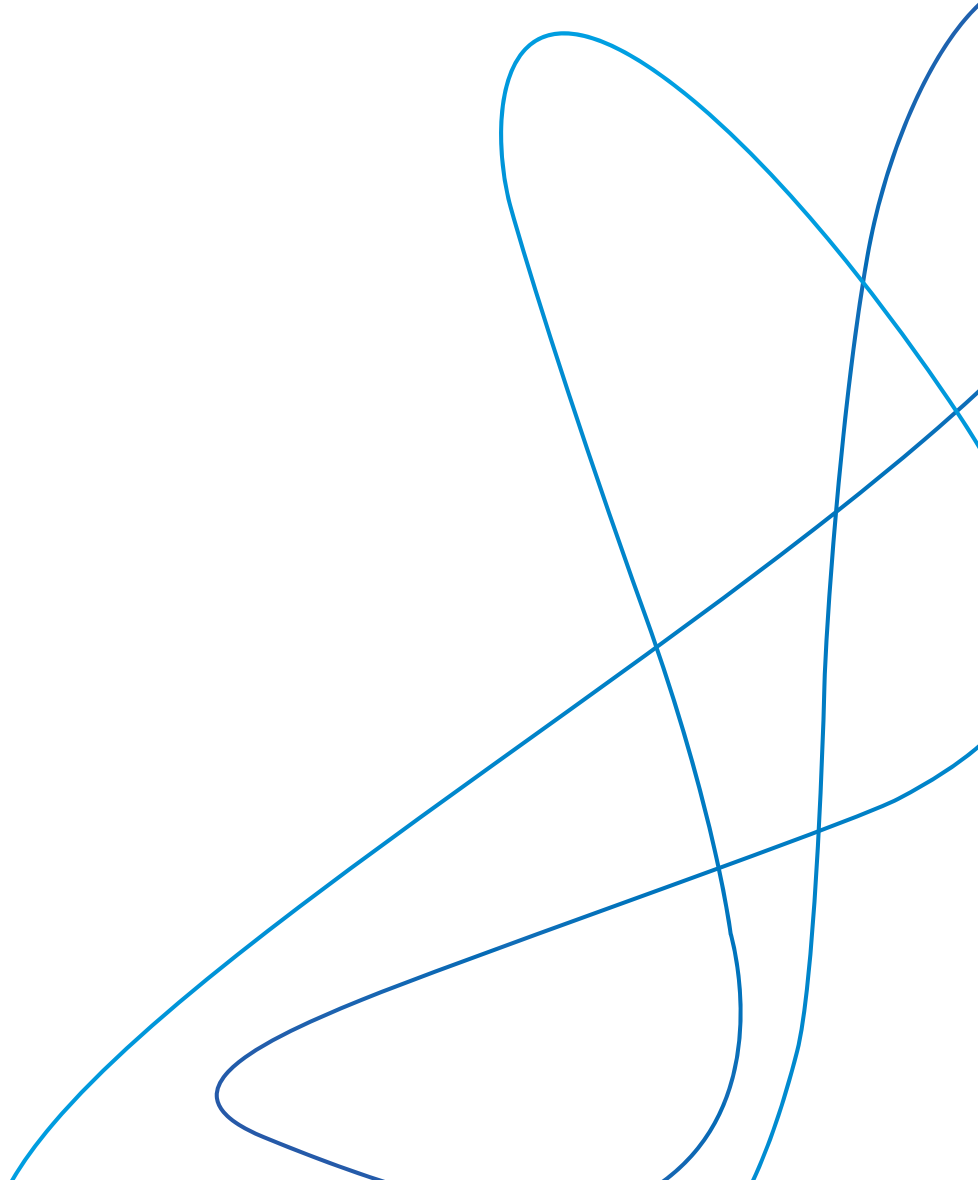
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INTRODUCTION

Modern slavery is one of the most complex and important human rights challenges of our time. According to the International Labour Organization (ILO), the term modern slavery covers a set of legal concepts, including forced labour, debt bondage, slavery of children and human trafficking. It is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.

At Intellihub, we do not tolerate modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

This statement sets out the actions that Intellihub has taken to understand all potential modern slavery risks related to our business.

Over the last year, we have strengthened our efforts to identify and prevent the risk of modern slavery. We enhanced our supply chain risk identification methods and took steps to encourage partners to develop best practices in combating forced labour. We expanded modern slavery training programs to raise awareness throughout our own operations, explored technology solutions. This statement assesses our risk, outlines our efforts, and sets commitments for the coming year.

THE INTELLIHUB BUSINESS

OUR BUSINESS

Intellihub has 311 workers. This makes out 282 permanent and 20 temporary contracted employees in Australia and New Zealand.

We provide services, such as asset management, installation, financing and the day to day operations of smart meters. Intellihub continues to develop and maintain partnerships on a global scale to provide grid visibility and value through data insight, empowering the delivery of customer-centric results.

We have operations and supply chains spanning the globe, and we are committed to improving the working conditions of people who are connected to our business and recognise the need to monitor for conditions that put workers at risk of modern slavery.

OUR POLICIES

Through our policies we communicate our values and expectations, setting a high bar for ourselves and our partners and making clear that we do not tolerate modern slavery. Some of the policies we enforce that enforce our stance against modern slavery are:

- Employee code of conduct
- Whistle blowing policy
- Procurement policy
- Modern slavery policy

GOVERNANCE

We are committed to embedding human rights considerations into decision-making, our policies and governance framework. Members of executive leadership formally approve Intellihub policies, including those listed previously. Executive leaders review social responsibility goals owned by each of our business teams on a quarterly basis to drive improvement. Review includes performance against these goals, such as supply chain audit and assessment results.

OUR SUPPLY CHAIN STANDARDS

Intellihub's Supply Chain Standards detail the requirements and expectations for suppliers in our supply chain. Our Supply Chain Standards focus on preventing situations that can put workers at risk of forced labour. They require that all work must be voluntary and workers must be free to leave work and terminate their employment or other work status with reasonable notice. Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of work.



ASSESSING OUR RISK

INDUSTRY OF OPERATIONS

Intellihub's biggest categories of spend include:

- The purchase of equipment and services for our customers (primarily business customers) either when Intellihub is acting as a equipment leasing service or a provider of managed services. This includes items such as metering devices, data services and support.
- Goods and services sold to Intellihub for the purposes of maintaining and providing data from metering devices.
- Goods and services sold to Intellihub to enable our IT environment, increased service offerings and compliance obligations.
- The remainder is spent on a range of services such as marketing, corporate services, content rights, electricity, travel, freight and courier, office supplies, and leasing.

AREA OF OPERATIONS

Understanding our modern slavery risks is critical to targeting our actions and partnerships to prevent and address the issue. We analyse risk in our business by engaging in research, mapping our supply chain against existing human rights indices, analysing internally-conducted audit results, and partnering with key stakeholders. We have embarked in supply chain mapping and thus far can confirm tier one operations in Australia, New Zealand, United Kingdom, United states and India.

OUR APPROACH TO RISK

We understand that our supply chain presents a need for efforts to assess and address modern slavery risk. We evaluate these risks using our teams and internal and external data. While modern slavery can be found in all countries, some suppliers operate in countries associated with a higher risk for modern slavery, for example, countries with large populations of migrant workers, weak labour law enforcement, countries where charging workers recruitment fees is common practice, or countries where modern slavery prevalence has been well documented. Doing business in these countries necessitates additional due diligence to help ensure workers are safe.

Our relationships with our suppliers and monitoring of their practices for modern slavery indicators also allow us to better understand modern slavery risk in our supply chain. We look for site-specific modern slavery indicators that can point to heightened risk, including the presence of workers who are part of vulnerable populations, a supplier's failure to deliver on a promised term of employment, restriction of worker movement, a supplier's retention of identity documents, debt bondage indicators such as charging recruitment fees, and excessive overtime requirements. This information informs our efforts to respond to those risks.



OUR PROGRESS

THE PROGRESS WE MADE IN OUR OPERATIONS

Intellihub launched a modern slavery employee training program across the whole business. As a best practice, we are working to educate and empower our employees on the ground to recognise the signs of modern slavery and know how to effectively respond if confronted with a suspected modern slavery issue. To raise awareness and reflect the importance to employees, we have put posters in all seven Intellihub offices' communal staff areas.

Intellihub has proposed a modern slavery educational course, by the University of Technology in Sydney, to all employees to take during their work hours.

Further to this, Intellihub has included a section in our code of conduct to modern slavery and has initiated a whistle blowing procedure.

THE PROGRESS WE MADE IN OUR SUPPLY CHAIN

We have engaged in robust due diligence processes of Intellihub suppliers. We recognise the challenges suppliers face when working to meet our Supply Chain Standards and work closely with them to ensure best practices. We prioritise mechanisms that drive continuous improvement and are committed to working with our suppliers to remedy issues found and put systems in place to prevent issues in the future. We increased due diligence of Intellihub suppliers by requesting a modern slavery clause insertion in all new supplier and customer contracts and issued a letter of due diligence to be acknowledged and signed by all suppliers. If we have reason to suspect that suppliers do not meet our Supply Chain Standards, we may request that the supplier demonstrate that its policies align with Intellihub's Supply Chain Standards, show processes for assessing risks, engage in unannounced audits, or verify where the products are made.

CASE STUDY

Responding to findings of illegal student labour in one of our supplier's supply chain, we engaged our supplier to assess their labour practices and the validation criteria they have used to select their suppliers. The assessment revealed evidence of practices in our suppliers' supply chain, resembling forced labour in their Taipei City manufacturing plant in Taiwan. There has been publicly reported that employed students were working nights and/or overtime and in some cases to perform work unrelated to their major. The report included that the manufacturer has dismissed the manager looking over the student labour program and is working on corrective actions. While the supplier asserted such practices were common in Taiwan, we took the view that it was not acceptable and in breach of our Code of Conduct. We wrote to the supplier and asked them to detail the corrective activity their manufacturer has undertaken and requested to see contracts and time sheets for all employees. The supplier agreed to this request. A follow-up audit will be conducted to ensure the changes we requested had been implemented.

OUR PLANS FOR THE FUTURE

Intellihub is proud of the significant progress we have made to date to advance human rights throughout our business, including actions to prevent and address modern slavery risks.

We will further measure our effectiveness by assessing our progress against the categories of commitments we have made.

Intellihub will be focussing on the following commitments in the following year:

Regularly review and improve our due diligence effort

- Supplier onboarding process
- Procurement policy
- Purchasing process
- Employee code of conduct

Roll out new Business Essentials and training on modern slavery

- New employee training on modern slavery
- Supplier Code of Conduct
- Modern slavery information pack for suppliers

Governance and accountability

- Statement and policy availability to employees, customers, suppliers and overall public

APPROVAL AND SIGNATURE

Multiple internal stakeholders were consulted during the drafting of this Statement and were given the opportunity to review and provide feedback at several stages of the process.

This statement was approved by the Intellihub Board of Directors and covers all activities undertaken by Intellihub's entities.

Intellihub Group CEO

Adrian Clark



30 June 2021

This statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018 and section 54(1) of the Modern Slavery Act (UK) 2015, where relevant.

It constitutes the statement of Intellihub Pty Ltd, Intellihub Ltd and Intellihub Ventures Pty Ltd. for the reporting period 1 July 2020 to 31 March 2021.

