

Western Power and Ethical Supply Chains

Partnering to operate ethical supply chains

From human rights related legislation like the *Modern Slavery Act (2018)* to maintaining social licence to operate and morally doing the right thing, there are many reasons why human rights is an important part of the procurement agenda. Western Power has a responsibility to uphold the highest integrity in human rights. We have an opportunity to work alongside our suppliers to identify and address modern slavery risks within our operations, our procurement practices and our shared supply chains.

This document supports our Supplier Code of Conduct and outlines Western Power's expectations in operating in an ethical and transparent manner. It also provides practical advice towards improving our mitigation of modern slavery risks. We encourage you to share this guide within your organisation and with your suppliers.

1. Western Power

Western Power builds, maintains and operates the electricity network in the South West corner of Western Australia. The Western Power network forms the vast majority of the South West Interconnected Network (SWIN), which together with electricity generators, comprises the South West Interconnected System (SWIS). We service 2.3 million customers across the state from residential and commercial to local and state government agencies and authorities. Our vast transmission and distribution network connects Western Australians to a wide range of both traditional and renewable energy sources.

We are committed to respecting human rights.

- We operate in a manner consistent with the United Nations (UN) [Guiding Principles on Business and Human Rights](#)
- Together with the Energy Procurement and Supply Association we co-developed the guide [Respecting Human Rights in Our Supply Chains](#) to address the moral and business challenges facing the energy business
- In 2020 we published our first [Modern Slavery Statement](#) under the *Modern Slavery Act (2018)* outlining our achievements to date and setting our pathway forward.

2. Awareness of modern slavery

Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. It is a hidden crime that affects every country in the world.

Modern slavery is an umbrella term and encompasses:

- human trafficking
- slavery and slavery-like practices



- forced labour
- debt bondage
- the worst forms of child labour
- forced marriage

The International Labour Organisation and Walk Free estimate that in 2016 40.3 million people were victims of modern slavery. Females account for 71% and children account for 25% of modern slavery victims.

For more information we recommend starting with the Walk Free Foundation's [What Business Needs to Know](#).

3. Grievances

Western Power encourages all suppliers, contractors and employees to take active responsibility in ensuring all business is conducted legally, ethically and safely. Suppliers and their employees, contractors, the general public and all Western Power employees are encouraged to contact Western Power directly or use our third-party hotline (STOPLine) to raise concerns about modern slavery, as well as fraudulent behaviour, safety concerns and unfair practices.

To contact Western Power visit our website at <https://westernpower.com.au/contact-us>. To make a confidential submission please call STOPLine on 1300 304 550.

Western Power expects all suppliers to inform us if they become aware of modern slavery in their operations or supply chains.

4. Conduct, corrective action and remedy

Western Power is working through a program to update its policies, procedures and systems to ensure we respect human rights while conducting our business activities. We have partnered with other organisations with the same values and goals and leveraged information from various sources.

At Western Power we select our suppliers carefully. We have high standards to meet our goals of sourcing ethically and responsibly. Set out below are Western Power's *minimum expectations* for our suppliers with links to external resources¹ that can be used to raise ethical and social performance. We encourage you to share these with your suppliers to improve our shared supply chains.

4.1 Codes of conduct and company policies

A human rights policy documents and sets out your expectations for your entire organisation. A supplier code of conduct communicates your values and expectations to your suppliers. Information on developing a human rights policy and supplier code of conduct and some best of class examples can be found through [Walk Free](#).

At a minimum Western Power expects your company to have a policy in place that:

- prohibits child labour ([International Labour Standards on Child labour](#))

¹ External resources are provided as a potential reference only. They are not intended to be exclusive, may not be comprehensive nor applicable in all circumstances.

- prohibits slave, forced or compulsory labour in all its forms
- includes contractual requirements on recruitment agencies and related operators to not charge any fees to workers for the purpose of recruitment or placement, and to not withhold identification documents
- recognises and respects the rights of all workers by complying with all applicable laws related to wages, employment conditions, working hours and legally mandated benefits along with freedom of association
- ensures all accommodation and communal services provided to workers in connection with their employment or engagement are clean and sanitary and meet the basic needs of the workers.

This policy should be communicated and enforced with your own employees, suppliers and subcontractors. Your process for selection of your suppliers and subcontractors should include a review of compliance with regards to human rights standards and you should consider placing contractual requirements on your suppliers and subcontractors to meet the same expectations.

4.2 Conduct supplier self-assessments

Supplier engagement is key in tackling the shared risks we face in our supply chains. Working together to identify and understand the risks of modern slavery is a critical step toward addressing the issue. We require our suppliers to complete a self-assessment of their business and supply chain allowing us to get a better picture of the risks we all face. The self-assessment questionnaire helps us to raise awareness of the issue, identify modern slavery risks, foster collaborative efforts between us and our suppliers to address those risks and helps us to improve the transparency of our very complex modern supply chains.

An example of the questionnaire is provided in the appendix. We encourage you to modify and use this with your suppliers to help identify risks you may face.

4.3 Establish a grievance mechanism

A grievance mechanism allows employees, contractors, suppliers and the public to raise concerns where they have been adversely affected by business activities. Establishing a grievance mechanism can improve the identification of risks, enable proactive efforts for mitigation and facilitate better community engagement.

For information on developing an effective grievance mechanism see [Compliance Advisor Ombudsman – Grievance Mechanism Toolkit](#).

4.4 More information

Western Power understands that it will continue to face modern slavery risks and our efforts to mitigate these risks will continue to evolve. This document outlines Western Power's minimum expectations our suppliers should be taking to address and mitigate the shared risks we face. To learn more and to continue improving our efforts the following resources may be helpful.

Walk Free Foundation's excellent [Business Toolkit](#)

The UN's [Corporate Responsibility to Respect Human Rights – An Interpretive Guide](#)

The Australian Border Force's [Modern Slavery Resources](#)

Appendix 1. Self-assessment questionnaire

An example of a self-assessment questionnaire can be found [here](#). This questionnaire can be modified and sent to your suppliers to help identify modern slavery risks that exist in your supply chains.

Understanding the risks of Modern Slavery in Supply Chains Self Assessment Questionnaire (SAQ)

Part A - Organisation's Details

- 1 Trading Name:
- 2 Company Legal Name:
- 3 ABN/ACN:
- 4 Company Address:
- 5 Related Entities Details:
(as defined by Australian Accounting Standards)
- 6 Under the Modern Slavery Act (2018) are you currently required to submit a report?
- 7 If yes, when is the first report due
- 8 Nature of business:
- 9 Are you aware of any modern slavery practices in your workplace or in the workplaces of any of your suppliers, either now or in the recent past?
- 10 Has your company (or any key employees) been named or involved in any administrative, regulatory, or criminal investigations involving modern slavery practices, even if resolved in favour of the supplier or employee?
- 11 If yes to either of the above please elaborate on remediation efforts your company undertook:

Part B – Workforce Composition

- 12 Would you describe the size of the trading company listed above as:
- 13 Would you describe your workforce as (please select most appropriate):
- 14 What is the percentage of your total workforce who are sponsored overseas employees on Temporary Skill Shortage Visa (457 or 482 visas):