

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by Newgen Power Kwinana Pty Ltd (ACN 116 827 546) (NPK) to address modern slavery risks in its business and supply chains over the financial year ending 30th June 2020.

Background and Organisation Structure

NPK is an Australian Company founded in 2005 and is the owner and operator of the Kwinana power station located 35 kilometres south of Perth, Western Australia.

The Kwinana power station is a 327 MW combined-cycle, gas-fired power station capable of supplying approximately 10% of the electricity in the South West Interconnected System (SWIS) in WA.

NPK is jointly owned by Energy Infrastructure Trust (which is managed by Infrastructure Capital Group (ICG)) and Sumitomo Corporation.

ICG is a specialist, independent infrastructure fund management firm investing and managing Australian infrastructure assets since 2001.

Sumitomo Corporation is one of the world's leading fully integrated trading and investing companies based in Tokyo, Japan and has accumulated knowledge and experience from all over the world in many business fields, from commodity trading, industry products distribution, mineral resources investments, infrastructure construction, operation and management.

NPK's direct workforce is made up of approximately 36 professionally qualified and skilled employees all with legal rights to work in Australia.

There are around 26 employees based at the Kwinana power station who are responsible for the day to day operations of the power station and regular maintenance and monitoring to ensure the station maintains its high efficiency power generation. These employees work across multiple business disciplines such as Engineering, Operations & Maintenance.

There are additional employees who work from the NPK head office in Perth CBD to provide support services such as Trading, Commercial, Finance & Accounting, Human Resources and IT.

Supply Chains

NPK supply chains are predominantly based in low risk countries and include the purchase of products and services needed for day-to-day business operations including personal protective equipment, IT infrastructure, staff training, equipment hire, external advisory services and travel.

All suppliers are expected to operate in a responsible, ethical, transparent manner and in compliance with applicable laws and regulations.

NPK's internal Finance & Accounting department also have various measures in place to minimise risks involved in the purchasing of products and services.

Even with the expectation that NPK's supply chain operates in a responsible, ethical, transparent manner and in compliance with applicable laws and regulations, it is recognised that every entity has modern slavery risks in its operations and supply chains, and that NPK may be directly linked to modern slavery practices through the activities of other entities who NPK has business relations with.

For example, textiles and electronics are recognised as high risk industries globally. Although NPK purchases these products from trusted organisations within Australia, in depth details regarding the level of due diligence exercised by suppliers in initial acquisition of products is unknown.

Covid 19 impacted the operations of NPK by diverting the attention of senior management responsible for due diligence to establish Covid Safe plans whilst maintaining the secure operation of the Power Plant. That impacted NPK's ability to issue a Modern Slavery Statement 6 months after the end of NPK's reporting period. The Modern Slavery implementation activities were resumed as soon as possible once operational workload permitted. Supplier checks are now complete and Covid 19 did not impact the level of risk of Modern Slavery in NPK's supply chains.

Proactive Steps

NPK is committed to taking proactive steps in further identifying, assessing and mitigating risks related to modern slavery in our supply chains and improving knowledge and transparency overall.

In identifying, assessing, controlling and reviewing risks related to modern slavery, NPK:

- Incorporated 'Modern Slavery' into the Risk, Audit & Compliance to ensure frequent review of internal actions to assess and address risks, including due diligence and remediation processes.
- Incorporated 'Modern Slavery' into existing risk management and compliance processes for continuous consideration and management.
- Developed a Modern Slavery Policy for employees, contractors, visitors and third-party representatives to increase overall business awareness and compliance.
- Initiated review of existing policies and procedures, and where applicable, revised documents to address Modern Slavery.
- Initiated a supply chain risk assessment to identify potential high risk suppliers.
- Reviewed contracts to add a Modern Slavery clause in new contracts and contracts up for renewal, when appropriate.
- Circulated information to employees to equip them with the knowledge required for identifying modern slavery warning signs and raising any concerns within the business or supply chains.

Ongoing Commitment

To assess the effectiveness of actions taken by NPK to help combat modern slavery, NPK:

- Has incorporated 'Modern Slavery' into the Risk, Audit & Compliance Committee meetings held twice per year to regularly review actions taken to mitigate modern slavery risks within the NPK business and supply chains.
- Will conduct an annual internal audit to determine if mitigation measures have been consistently actioned by relevant business disciplines (i.e. review new supplier engagement processes / documentation and ensure frequent review of preferred supplier list).
- Will track actions taken each year to address modern slavery and report the impact of each action.

NPK has taken on a continuous improvement approach towards Modern Slavery and in ensuring that its awareness and contribution improves in quality and impact every year

This statement was approved by NPK's principal governing body on the 12th of February 2021.



Andrew Sutherland
Chief Executive Officer
8th of March 2021