Modern Slavery Statement FY2022 Bluewaters Power Group



This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by Bluewaters Power 1 Pty Ltd (93 106 034 879), Bluewaters Power 2 Pty Ltd (57 122 896 968), and Bluewaters Power Services Pty Ltd (29 603 887 387) (Bluewaters'), the reporting entities, to address modern slavery risks in our business and supply chains over the financial year ending 31st March 2022. Bluewaters' does not own or control any other entity.

Background and Organisation Structure

Bluewaters' was founded in 2003 and manages the Bluewaters power station located 4.5 kilometres north east of Collie, Western Australia.

Bluewaters Power 1 and Bluewaters Power 2 are power generating assets sharing the same geographical location, which are operated by one group of employees contracted by Bluewaters Power Services (the Operator).

The Bluewaters Power station consists of two 217MW units and runs on sub-bituminous coal, supplied under long-term contracts from the coal mining town of Collie. As the newest coal-fired power station in Western Australia, Bluewaters is an efficient unit with low emissions of this type of generator. Bluewaters supplies over 15% of the electricity in South West Interconnect System WA.

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

There are approximately 55 employees based at the Bluewaters Power station who are responsible for the day to day operations of the power station, 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 and Outage.

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

Supply Chains

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

Bluewaters' risk of Modern Slavery in its operation is considered low based on the highly technical nature of its industry.

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

Bluewaters' incorporated a Modern Slavery clause in its Terms and Conditions to ensure Suppliers commit to mitigating Modern Slavery risks in their operations.

Bluewaters' 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 Bluewaters' 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 Bluewaters' may be directly linked to modern slavery practices through the activities of other entities who Bluewaters' have business relations with.

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COVID-19 did not adversely impact the operations of Bluewaters' or its suppliers'.

Proactive Steps

Bluewaters' 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.

As both assets are operated by Bluewaters Power Services, all standards pertaining to Modern Slavery apply to all Bluewaters' entities.

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

- Maintains Modern Slavery Rules for employees, contractors and third-party representatives in increasing overall business awareness and compliance.
- Completed a review of existing policies and procedures, and where applicable, revised documents to address modern slavery.
- Assessed new Suppliers through initial desktop due diligence followed by due diligence questionnaires when more information was required. The due diligence is based on the geographical location of the suppliers, their activity and where practicable, the potential source of the products supplied to Bluewaters'. No new suppliers qualified for a due diligence questionnaire during the reporting period.
- Completed an internal audit of the Modern Slavery processes which found instances of the Supplier checks not being carried out in a timely manner. Process modification based on the audit outcome have been implemented
- Incorporated user feedback in the Supplier Checklist.
- Circulated information to employees to help equip them with the knowledge required for identifying modern slavery warning signs / red flags and how to raise any concerns within the business or supply chains.

Effectiveness

No remediation processes were required to be taken during the reporting period.

Bluewaters' has taken on a continuous improvement approach towards Modern Slavery and In ensuring that its awareness and contribution improve in quality and impact every year by tracking actions and their outcome and undertaking regular internal governance assurance processes.

The awareness of Modern Slavery has increased within Bluewaters' thanks to the completion of a Modern Slavery Awareness training issued to all employees.

The Supplier checklist and Questionnaire were improved based on Employees' suggestions.

2022-2023 Commitment

To help combat modern slavery, Bluewaters':

- Will assess new Suppliers against Modern Slavery risks prior to on boarding through desktop due diligence and Supplier questionnaire where applicable.
- Will review Modern Slavery processes and potential risks as part of the Risk, Audit & Compliance Committee (RACC) meetings held twice per year.
- 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).
- Will track actions taken each year to address modern slavery and report the impact of each action.
- Will continue raising awareness of Modern Slavery and internal protocols to mitigate risks amongst all employees with the annual completion of an online based Modern Slavery Awareness Training module.

This statement was approved by the Board of Bluewaters' in their capacity as the principal governing body of Bluewaters' on 01/08/2022



This statement was approved by the Board of Bluewaters' in their capacity as the principal governing body of Bluewaters' on 01/08/2022

This statement is signed by Andrew Sutherland in his role as the Chief Executive Officer of Bluewaters'.

Andrew Sutherland

Chief Executive Officer of Bluewaters'

01/08/2022