

# Flow Power

Modern Slavery Statement FY20/21

# Important Information

## Background

This statement is made on behalf of Kin Power Group Pty Ltd and its wholly owned subsidiaries, including Progressive Green Pty Ltd trading as Flow Power. References to “we”, “us”, “our” or “the company” are references to each of those entities. This statement sets out the steps that we have taken to ensure that modern slavery and human trafficking is not taking place within our operation or our supply chains. This statement is made pursuant to sections 13 to 16 of the Australian Modern Slavery Act 2018 with respect to the financial year ending 30 June 2021. This is our second year as a reporting entity under the Act.

This report may reference significant events occurring after 30 June 2021. Where this report contains forward looking statements, including statements of current intention, statements of opinion and predictions as to possible future events, these statements are not statements of fact and there can be no certainty of outcomes in relation to the matters to which the statements relate.

## About our business and operations

Kin Power Group Pty Ltd is an Australian company (ACN 623 522 467) and is the parent entity of Flow Power and Utilacor.

Flow Power is a specialist energy retail business providing innovating solutions for purchasing electricity from the wholesale market, generation solutions, green power as well as providing consulting and advice to approved commercial and industrial customers.

Utilacor is mainly an energy management business with 20 years' experience as a trusted authority and energy advisor to a broad range of customers to achieve their energy management goals.

We have over 80 employees across our offices in Melbourne, Sydney, Adelaide, and Brisbane. We also conduct part of our billing operations in India.

In addition to Flow Power's electricity retail and energy management business, we also have recently acquired a controlling interest in iEnergytech Pty Ltd (ACN 131 588 755) who supply solar photovoltaic solutions.

## Message from our CEO

I am pleased to present Flow Power's Modern Slavery Statement in 2021.

We recognise modern slavery is a global problem and are putting our resources into helping to eradicate it.

We understand the importance of responsible procurement in the nature of our business and are committed to ensuring that environmental, social, and ethical considerations are considered when making procurement decisions. We are committed to building upon the ongoing and evolving process to review and assess our actions to identify and address modern slavery risks in our operations and supply chains.

In FY2021, we continued to develop our internal Modern Slavery Framework with a focus on procurement activities and increasing the wider business's understanding of modern slavery risks through modern slavery training. We have also joined the Clean Energy Council's Risks of Modern Slavery Working Group to ensure our actions and consistent with our industry's actions and contribute to long-term action goals.

Any form of modern slavery is unacceptable, and I am proud of the work Flow Power has done and will continue to do to assess and address the risk of modern slavery within our operations and supply chain.



Matthew van der Linden

Chief Executive Officer and Founder

23 December 2021

# Our approach

## Our structure and operations

Our operations as a specialist energy retail business providing innovative electricity solutions involve

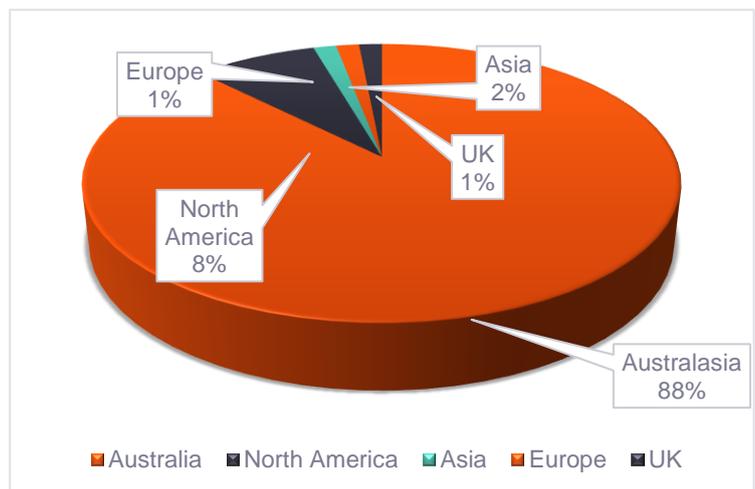
- + Energy and Client Solutions which comprises of our commercial and industrial customer portfolio and is responsible to electricity retailing.
- + Projects which is responsible for establishing our solar and wind farm projects which are currently all at different stages of completion.
- + Engineering which is responsible for assisting customers achieve their energy management goals.
- + Investments which currently comprise Flow Power's interests in iEnergytech.

Other relevant functions also include our People and Culture team and our Legal and Procurement teams.

## Supply chain

Our supply chain includes the following sectors:

- + Energy distributors
- + Generation projects
- + Development and IT solutions
- + Hardware
- + Professional services e.g. marketing, consultancy services, legal services
- + Cleaning services



Our major suppliers comprise of energy distributors and expenditure for our solar and wind farm projects.

The pie chart above shows the percentage of our total spend for 20/21 by supplier location. While we have a global supply chain, 88 per cent of our spend is concentrated in Australia (Australasia).

# Our highlights

## 2019-2020

- + Developed our policies and processes for wider business to align with UN Guiding Principles on Business and Human Rights
  - Human Rights Policy: enshrines our commitment to protect and uphold fundamental human rights.
  - Supplier Code of Conduct: sets our expectation that suppliers comply with all applicable laws and demonstrate their respect for the fundamental human and labour rights of workers.
  - Whistleblowing Policy and Program: established an internal and external reporting mechanism to encourage people to raise concerns as soon as possible and feel safe doing so.
- + Assessed modern slavery risk of major suppliers through Self Assessment Questionnaires to gain deeper insight into their labour practices.

## 2020-2021

- + Developed Responsible Sourcing Policy and Process to assess modern slavery risk during procurement activities
- + Engaged in extensive dialogue with suppliers in high risk profile groupings to deeply assess modern slavery risk
- + Joined the Clean Energy Council Risks of Modern Slavery Working Group to collaboratively address modern slavery issues and concerns in the energy industry
- + Implemented compulsory modern slavery training for relevant staff (senior team, employees with contract administration and/or procurement activities)

# Risks of modern slavery within supply chain

We assessed modern slavery risks in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing or directly linked to modern slavery practices.

We found areas of vulnerability in our supply chain included polysilicon components in solar panels for our solar farm projects and hardware components for our proprietary device technology. We have conducted due diligence and engaged in extensive dialogue with the relevant suppliers to seek to minimise the risks in these areas of vulnerability.

Our risk assessments consider of a number of potential risk factors of modern slavery in our supply chains, including geographic risks from where we source materials, risks from the type of products or services we procure, the sectors or industry risks and the supply chain model of the supplier entity.

We also acknowledge that we lack visibility in certain overseas markets and this carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our group's goods and services.

# Our management of our modern slavery risks

Management of our human rights risks, including modern slavery, is underpinned by our Human Rights Policy and Risk Management Framework, with oversight from the Board of Kin Power Group.

## Actions undertaken to address modern slavery risks

Further developed our internal Modern Slavery Framework

- + Developed and implemented our Responsible Sourcing Process to assist the business in assessing suppliers for modern slavery risk when making procurement decisions
- + Became a SEDEX member – using their platform and tools to gain better insight into supply chains
- + Included modern slavery clauses in our procurement contract templates

Building our understanding of modern slavery in the wider business

- + Rolled out an internal modern slavery online training module to relevant staff (i.e. senior employees, employees with contract administration or procurement responsibilities)

Enhanced consultation with stakeholders

- + Joined the Clean Energy Council Risks of Modern Slavery Working Group to gain more insight on addressing and assessing modern slavery risks in the energy industry through short-term and long-term actions.

# Reviewing the effectiveness of our actions

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to build upon.

We have put in place a process to regularly review and assess the effectiveness of our policies, codes, standards, and procedures as part of our Risk Management Framework with the oversight of the Executive Leadership Team.

Our approach includes tracking actions we have taken such as tracking the number of modern slavery modules delivered to staff; setting up a process to provide for regular engagement and feedback between key areas of our business especially between the legal teams and procurement teams.

This includes setting ourselves our annual goals and commitments so we can look back and assess the effectiveness of our approach and inform our path forward.

## Looking ahead

We recognise that eradicating modern slavery requires dedication to make a positive difference to people's lives, in line with our purpose. Delivering on this undertaking will take a concerted effort by Flow Power, our suppliers, peers, supported through cross-industry collaborations.

Looking ahead we plan to progress the following actions in FY2022 and beyond:

### 2021-2022

Further building upon our understanding of our own suppliers

- + Focus on large-scale audit of business to assess modern slavery risk for existing suppliers
- + Continue to engage with more suppliers in the highest risk profile groupings to deeply assess exposure to modern slavery practices.

Consistent review of our Modern Slavery Framework

- + Periodically review to assess for gaps within our internal Modern Slavery Framework and develop improvements according to best practice

Active participation in the Clean Energy Council's Risks of Modern Slavery Working Group

- + Contribute to tangible improvements and actions collaboratively with the working group seek to address modern slavery issues specific to the energy industry

### Consultation and approval process

In order to prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control.

In performing the actions described throughout this Statement, consultation included engagement with

- + various levels of management and business unit representatives.
- + Flow Power's Executive Leadership Team who has reviewed the outcomes of relevant assessments

The Flow Power Risk & Compliance Committee will retain oversight of our human rights and modern slavery risks through our Risk Management Framework.

Our Executive Leadership Team has also been involved in the compilation and endorsement of this Statement for approval by the Board. This Statement was approved by the Board of Kin Power Group in their capacity as principal governing body on 13 December 2021 and is signed by the Chief Executive Officer.

# Directory

## Registered Office

Ground Floor, 109 Burwood Road  
Hawthorn VIC 3125

PO Box 6074  
Hawthorn VIC 3125

T: 1300 08 06 08

[www.flowpower.com.au](http://www.flowpower.com.au)

[go@flowpower.com.au](mailto:go@flowpower.com.au)

## Secretary

Jonathan Mitchell

## Auditor

Grant Thornton

## Whistleblower Line

Stopline – Flow Power’s Independent  
Whistleblower Service

**Phone:** 1300 30 45 50 (in Australia)  
+61 3 9811 3275 (from outside of  
Australia – note that this is a  
reverse-charges line)

**Fax:** Flow Power, C/- Stopline +61 3  
9882 4480

**Email** [flowpower@stopline.com.au](mailto:flowpower@stopline.com.au)

**Online:** <https://flowpower.stoplinereport.com>

**Mail:** Flow Power, C/- Stopline  
Locked Bag 8  
Hawthorn Vic 3122