

This joint statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by NewGen Kwinana Holdings Pty Ltd (ABN 68 116 576 955) and its subsidiaries NewGen Power Kwinana Partnership (ABN 24 808 796 430), EIT Kwinana Partner Pty Ltd (ABN 84 115 348 171), Summit Kwinana Power Pty Ltd (ABN 77 116 803 779) and NewGen Power Kwinana Pty Ltd as agent of the NewGen Power Kwinana Partnership (ABN 52 116 827 546 ) (the Reporting Entities) to address modern slavery risks in its business and supply chains over the financial year ending 30th June 2022.

Only one of the entities listed above undertakes operations, being NewGen Power Kwinana Pty Ltd (NPK), therefore consultation was not required with the other entities as they do not have any physical operations or assets.

### **Background and Organisation Structure**

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

The NewGen 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 NewGen 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 such as Australia and New Zealand and include the purchase of products and services needed for day-to-day business operations including personal protective equipment, IT infrastructure, employees training, equipment hire, external advisory services and travel.

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

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

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

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.

COVID-19 did not adversely impact the operations of NPK or its Suppliers.

### **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, reviewing risks related to modern slavery NPK:

- Maintains Modern Slavery Rules for employees, contractors, visitors and third-party representatives to increase 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 NPK. Two Supplier questionnaires were sent in the reporting period.
- Completed an internal audit of the Modern Slavery processes which found instances of the Supplier check not being carried out in a timely manner. Process modifications based on the audit outcome have been implemented.
- Incorporated user feedback in the Supplier Checklist.
- 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.

### **Effectiveness**

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

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

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

The Supplier checklist was improved based on Employees' suggestions.

### **2022-2023 Commitment**

To help combat the risk of modern slavery, NPK:

- 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 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.
- 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 NewGen Kwinana Holdings Pty Ltd in their capacity as the parent entity on 29/07/2022.

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



Andrew Sutherland  
Chief Executive Officer of NPK  
19/08/2022

