



**Newcastle Coal**  
INFRASTRUCTURE GROUP

# Modern Slavery Statement

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**Year ended 30 June 2025**



DOCUMENT NO: COMM.APRV.03.01

NEXT REVIEW DATE: 03-09-2026

REVIEW FREQUENCY: 1 years

DOCUMENT OWNER: John Kite

DOCUMENT APPROVER: Chief Executive Officer

# NCIG MODERN SLAVERY STATEMENT

## (for the year ended 30 June 2025)

## INTRODUCTION

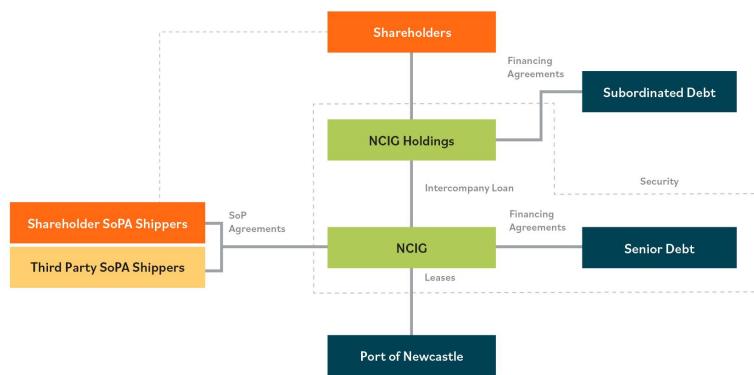
This is the Newcastle Coal Infrastructure Group Pty Ltd (**NCIG, our or we**) Modern Slavery Statement for the year 1 July 2024 to 30 June 2025 (**Reporting Period**) (**FY25**), which responds to the requirements of the Modern Slavery Act 2018 (Cth) (**Act**). It describes our structure, our operations, our supply chain, the risks of modern slavery in our supply chain and operations, and the actions we have taken to address those risks during this Reporting Period, based on the steps laid out in NCIG's previous Modern Slavery Statement for the year ending 30 June 2024. It also provides details of our assessment, governance and risk management processes and sets out future identified actions. This Statement was approved by NCIG's Board of Directors on 3 September 2025.

## ABOUT US

NCIG respects universal human rights and manages the risks of modern slavery in our own operations and in our supply chain where feasible. We work hard to provide a healthy, safe and sustainable workplace and will not tolerate any instances of modern slavery. We expect the same high standards from all our contractors, suppliers and other business partners, and are committed to continuously improving transparency in our business, and to managing the risk of modern slavery in our supply chain.

## OUR STRUCTURE

NCIG, which is a wholly owned subsidiary of NCIG Holdings Pty Ltd and the reporting entity in accordance with the Act, owns and operates the Newcastle Coal Infrastructure Group export terminal. It is the sole business of NCIG. NCIG does not own or control any other entities. The corporate structure of the NCIG group and its key contractual arrangements, including Ship or Pay Agreements (SoP), are depicted in the diagram below.



NCIG Holdings Pty Ltd is a privately held corporation owned and governed by a shareholder group that is solely comprised of coal producing companies and exporters in the Hunter Valley Region, specifically including BHP, Yankuang Group Co (Yancoal), Whitehaven Coal, Banpu Public Company Limited, and Peabody Energy Corporation. All shareholders are affiliates of shippers that have long-term capacity contracts at the terminal for the majority of our terminal's capacity. NCIG Holdings Pty Ltd is a holding company and does not conduct any operations.

## OUR OPERATIONS



### What We Do

NCIG is an integral part of Australia's coal supply chain and generates strong economic benefits for the Hunter Region and for New South Wales. Our facilities operate 24/7 and include rail, coal storage, ship loading and associated infrastructure, ensuring reliability and continuity of coal supply from Newcastle, Lake Macquarie, the Hunter Valley, Gloucester, Gunnedah Basin and Western Coalfields to the world export market.

NCIG is one of three coal export terminals in the Port of Newcastle, the largest coal export port in the world based on throughput. Our export terminal has an approved capacity of 79 million tonnes per annum (Mtpa) and in FY25 we loaded 48.8 million tonnes (Mt) of coal.

Our export logistics service is flexible, agile and considerate of our customers' needs, and we work closely with them to safely transport coal from rail to ship. As part of our approach to sustainably manage our business, we also promote and provide innovation, economic stimulus, ecological enhancement and community support.

### Our Workforce

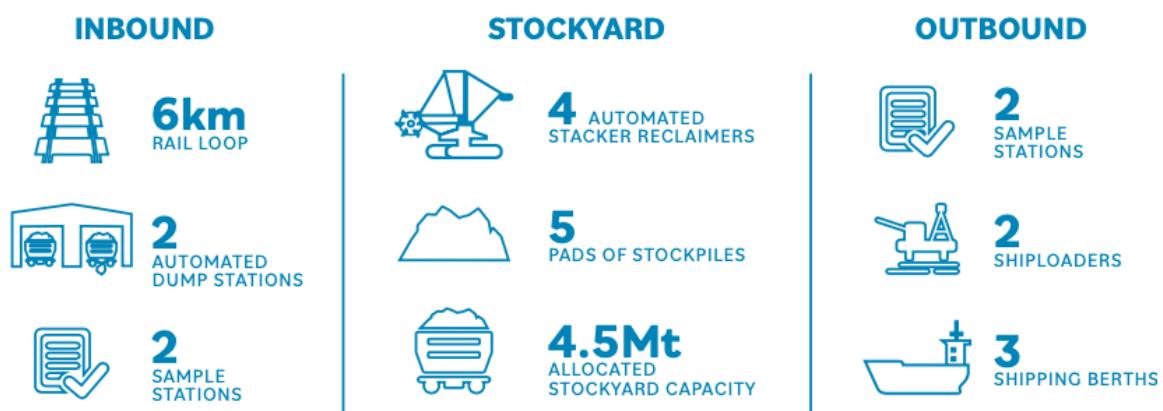
NCIG has operated one of Australia's major coal export terminals on Kooragang Island within the Port of Newcastle since 2010. We have a lean and highly productive workforce of 117 employees, which is supplemented by contract labour to support our operations and maintenance activities. Of our employees, NCIG's Technicians are covered by the Coal Export Terminal (CET) Operations Workplace Agreement, which includes labour related standards as is approved by the Fair Work Commission.

The daily operation of NCIG relies on the critical role played by several key local contractors across maintenance, engineering, human resources and other specialist disciplines. Although we recognise that there are risks associated with contracted labour, NCIG sources from local and preferred contracting companies that undergo due diligence and regular audits.

## Our Infrastructure Assets

Our primary infrastructure is located across three operational and geographical areas being:

- Inbound – privately owned rail track, comprising of two 6km loops and additional track, two automated dump stations (coal unloading stations), an inbound sample plant and associated conveyor infrastructure
- Stockyard – consisting of five 1km long stockpads, four stacker reclaimers and associated conveyor infrastructure
- Outbound – three shipping berths, two shiploaders, an outbound sample plant and associated conveyor infrastructure.



More information about what we do and how we work can be obtained on our website at [www.ncig.com.au](http://www.ncig.com.au)

## OUR SUPPLY CHAIN



In FY25 our procurement expenditure on goods and services was \$48.9 million. This figure excludes other operating expenditure on categories such as major utilities (water, electricity) taxes, licences, fees, interest, land lease and other government charges. We recognise that this represents opportunities for us to promote

social and economic value creation, and to contribute to the potential for development of social and environmental innovation. We are a member of a global supply chain and acknowledge that we are potentially exposed to Modern Slavery risks. Our suppliers in higher risk industries include those in heavy plant, rubber, IT equipment, bulk materials and personal protective equipment (PPE).

### Local Supplier Focus

As part of our sustainability strategy, we aim to source as much as possible from local businesses with many of our critical supply partners based in Newcastle and the broader Hunter Region. Our definition of local procurement is the purchase of goods and services from businesses that have a local office in the Local Government Areas of Newcastle, Port Stephens, Lake Macquarie, Maitland, Dungog, Muswellbrook, Upper Hunter, Singleton, Cessnock and Central Coast. Our pre-tender identification process considers local businesses favourably, and we give preference to local suppliers where feasible and within criteria boundaries. With a largely local and Australian supplier base, and a commitment to fair employment conditions for employees, NCIG's exposure to direct Modern slavery risk is considered to be low.

Through our focus on local procurement, in FY25 our total local spend was \$41.7 million, which is 85% of our total procurement expenditure. The total amount spent within the rest of Australia was \$7.2 million, bringing total spend in Australia to \$48.9 million (99.8% of total expenditure). Only 0.2% of procurement expenditure was spent with suppliers incorporated outside Australia, and according to the [Global Slavery Index](#), risk in these countries of spend is considered either low (United Kingdom, Netherlands, Austria and United States), or moderate (China)<sup>1</sup>.

### FY25 ECONOMIC SPEND



*The above excludes major utilities (water, electricity) taxes, licences, fees, interest, land lease, and other government charges.*

## IDENTIFYING OUR MODERN SLAVERY RISKS

NCIG is aware that exposure to modern slavery could exist in our Operations and Supply Chain. We take a targeted risk-based approach to identifying modern slavery risks and acknowledge that there are several types of risk to consider, including: products and services risk, sector and industry risk, geographic risk and supply chain model risk. We aim to identify our risks primarily through our policies and procedures, risk assessment

<sup>1</sup> Ranked by prevalence. The Global Slavery Index, 2023.

and management, due diligence, sustainability strategy and training, which are regularly reviewed, improved upon and updated.

The vast majority of our supply chain is locally based and accordingly low risk. There is increased risk associated with international entities within the supply chain of our suppliers who may engage in modern slavery to minimise production costs.

Our larger modern slavery risks relate to maintenance of our asset base, including supply of products such as heavy plant, IT equipment and rubber, where those products are manufactured overseas. Where possible, NCIG chooses to partner with suppliers that manufacture in countries such as the Netherlands and Austria, which have comparatively lower modern slavery risk levels, while still maintaining oversight through ongoing due diligence. Another higher risk area is the supply of personal protective equipment (PPE), where competitive market pressures can drive suppliers to lower-cost, higher-risk production. NCIG prioritises our modern slavery control efforts towards these identified higher-risk areas to ensure ethical and responsible sourcing.

NCIG is cognisant of other risks that we may be exposed to with respect to our customers' operations and being part of an international supply chain. We are committed to better understanding these risks over time.

In FY25, we did not become aware of any instances in our operations or supply chain that were in breach of our Modern Slavery policies or procedures. As we refine our approach to modern slavery, specifically continually improving upon our due diligence practices on suppliers and customers in our future reporting periods we also commit to further engaging with our key suppliers for transparency to increase our understanding of the primary modern slavery risks existing in our supply chains.

We continue to be alert and aware of additional modern slavery risks which may arise in the future.

## MANAGING AND ADDRESSING OUR MODERN SLAVERY RISKS

NCIG is committed to acting ethically and with integrity in all of our business dealings and relationships. This includes implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our business and taking appropriate steps to reduce and mitigate the impacts of modern slavery within our global supply chain.

In FY25, NCIG continued to implement key control mechanisms to identify any risks which may contribute, cause or be directly linked to modern slavery practices, and mitigate, monitor and manage these identified risks within NCIG's business and supply chain operations.

### GOVERNANCE STRUCTURE

NCIG's governance structure includes a constituted Board of Directors representing each of our shareholder companies, and an independent Chair. The Board is consulted on, and ratifies, strategic decisions by the business, including our vision, mission, values and risk management. Our risk to modern slavery is also overseen by the Board's Audit and Risk Committee.

The executive level of the business is accountable for implementing the strategic direction across the business via collaboration between Business Planning, Operational Capability, Assets and Infrastructure, Commercial, Sustainability, Customer Assurance, and People & Culture teams.

## Commitment to Continuous Improvement

Our governance framework is supported by a guiding principle of continuous improvement. It is important that we continuously assess our business risks and opportunities beyond our day-to-day terminal operations, including ways we can further reduce our exposure to modern slavery risks and opportunities to establish management procedures and mechanism to better identify and address any exposure to modern slavery practices within our supply chain.

## POLICIES AND PROCEDURES

### Policies

NCIG's Modern Slavery Policy defines modern slavery and the behaviours that could amount to modern slavery, and mandates employee and contractor behaviours and commitments with respect to the management and mitigation of modern slavery, real or potential, across the organisation. Our Modern Slavery Policy, Anti-Corruption Policy, Whistle-blower Policy and Code of Conduct Policy all provide support for our employees and contractors with respect to the identification of potential modern slavery risks across our business and supply chain. Our Code of Conduct and Whistle-blower policies also facilitate confidential and anonymous reporting of any concerns that staff or external parties may have regarding modern slavery risks within our operation and across the supply chain, along with protections and investigation processes when a report has been made.

These policies are regularly communicated to all employees of NCIG, can be accessed on NCIG's intranet, and continues to be reviewed and updated on a regular basis to align with modern slavery practices and risks as they evolve.

### Procurement Policy and Procedure

Modern slavery criteria and requirements are incorporated in all procurement templates and conditions of tender. A detailed questionnaire (Tender Schedule 11) is required to be completed by respondents addressing how modern slavery is managed across their business. Respondents are also requested to provide supporting documentation regarding their Modern Slavery policies and procedures. This allows NCIG to assess their commitment to mitigating modern slavery and reducing NCIG's exposure to potential modern slavery risks before contracts and relationships with suppliers are formed. These conditions and requests for information have a two-fold effect, namely they:

- highlight to potential contractors NCIG's commitment to the management and mitigation of modern slavery within our business; and
- provide NCIG with the opportunity to review the commitment and maturity of potential contractors to the mitigation and management of modern slavery. NCIG's procurement process continues to require all tenderers to understand this commitment and to provide NCIG with relevant documentation and information through a detailed survey, to be submitted during procurement processes for NCIG's consideration and evaluation.

NCIG's standard supplier contracts and terms and conditions have provisions to address modern slavery, and all new contracts entered into with NCIG contain these provisions. The provisions highlight NCIG's commitment to mitigating modern slavery risks within our business and requires confirmation from respondents that these provisions are acknowledged and can be complied with. NCIG regularly reviews and updates our procurement processes, including all procurement templates and conditions of tender, detailed questionnaire, procurement procedures, standard supplier contracts and terms and conditions, to ensure they continue to assist in the mitigation of any potential modern slavery risks before contracting with potential contractors and suppliers.

In FY25, we had Nil potential contractors and suppliers who did not adhere with the detailed questionnaire or provide the required supporting documentation, resulting in NCIG rejecting their tender and procurement application.

## Sustainable Procurement Target

NCIG's Sustainability Strategy describes our future direction and ambitions towards optimising sustainable operations. It demonstrates how we incorporate environmental, social and governance (ESG) considerations across our operations, and how we mitigate and manage our risks. As part of this strategy, we established a formal target to have at least 70% of total annual expenditure being spent locally. This contributes to our commitment and goal to support the prosperity of Newcastle and the Hunter Region and give preference to local businesses where feasible and within criteria boundaries.

In FY25, we met this formal target having 85% of NCIG's total annual expenditure spent in the Local Government Areas.



## RISK ASSESSMENT AND MANAGEMENT

Our risk management processes help us systematically identify and assess foreseeable risks, including those related to our operations, customers and supply chain. These processes include, but are not limited to our:

- Corporate Risk Assessment – a review process that includes external stakeholder interviews, and an externally facilitated annual assessment workshop that identifies material business risks and mitigation strategies. In FY25, this was presented to the Board Audit and Risk Committee for ongoing tolerance of material risk, together with consideration of associated Risk Control Action Plans.
- Broad-Brush Risk Assessment (BBRA) – facilitated by external consultants every three years and includes risk identification, descriptions, analysis, ratings and treatment plans. The most recent BBRA concluded in February 2023, and approved actions were identified and incorporated. NCIG's next BBRA facilitated by external consultants is scheduled for February 2026.
- Corporate Risk Register – prioritises our risks based on their risk profile and level of severity as identified during the enterprise-wide business risk assessment and is regularly reported to the Board. In FY25, modern slavery risks ranked relatively low in severity in comparison to other corporate risks identified within NCIG.
- Risk control action plans – address key business risks, which are reported to the NCIG Audit and Risk Committee and outline next steps in addressing, controlling and mitigating these key risks.
- Project Approval Management Plans – developed as part of our licence approval process, they describe our risk assessment procedures by topic and include risk management activities.

- Risk Assessment Training Module – a risk assessment module is integrated into our internal training processes to assist with the identification of risks by NCIG employees.

## DUE DILIGENCE AND EFFECTIVENESS

A staged approach to supplier due diligence process continues to be a focus point for NCIG. This Reporting Period, to improve upon our due diligence processes and mechanisms, we reviewed and undertook due diligence on all new and current suppliers and business partners through supplier engagement questionnaires in addition to the procurement procedures.

The FSMR project (new ERP system implementation) adopted in previous reporting periods continues to provide the opportunity for NCIG to advance its procurement reporting, by enabling better classification of suppliers and their sectors, supporting more efficient classification of high-risk suppliers.

NCIG takes the following steps to monitor and mitigate modern slavery risk:

- 85% of our spend is with local suppliers, which operate under strong labour laws
- NCIG personnel visit potential manufacturing facilities to verify work conditions prior to engagement
- Where not possible to visit facilities, reference checks are performed with third parties or QA inspectors engaged to visit facilities.

NCIG is committed to notify any contracting parties of any confirmed instances of modern slavery and any actions required by that contracting party to remedy the issues. There were no instances of modern slavery during the FY25 Reporting Period.

## TRAINING

In addition to providing modern slavery training to key personnel, NCIG has implemented a new induction module for new hires and contractors to raise awareness and set expectations on identification and reporting of suspected modern slavery within NCIG's operations. NCIG is committed to providing relevant staff and contractors with training in recognition of potential risks, actions that should be taken when a risk (real or potential) is identified, and the expectations of our suppliers and contractors in managing and mitigating modern slavery risks. Our training program is delivered to relevant staff and contractors, is reviewed on a regular basis and continues to be updated to ensure the training remains effective.

## STAKEHOLDER CONSULTATION AND ENGAGEMENT

NCIG is committed to consulting and engaging with our key stakeholders seeking opportunities to collaborate to manage modern slavery risks. We recognise that stakeholder consultation and engagement is an effective measure in the identification, management and mitigation of modern slavery. Our key stakeholders extend beyond our personnel, contractors and suppliers to customers, it also includes industry peers, the local community in which we operate and associated government entities.

We communicate with our key stakeholders, which allows us to develop trusting relationships through transparent reporting of performance and the sharing of information about our approach. One example is our Sustainability Report, in which we report our sustainability performance aligned to our Sustainability Strategy and in accordance with the Global Reporting Initiative Standards. Each reporting period we endeavour to reach out to a broad group of stakeholders to gain different perspectives and build upon our objectives to identify and mitigate real and potential modern slavery risks and practices

## ACTIONS UNDERTAKEN IN FY25

NCIG recognises that managing and mitigating our modern slavery risks requires continuous effort. Several actions were performed during the Reporting Period (FY25). The actions were:

- **NCIG Modern Slavery Working Group** – The group has met regularly during the year to monitor progress of identified actions for FY25. Our commitment to reduce and mitigate modern slavery risk has been noted in our Sustainability Report and issued to all employees and contractors. Meetings have been organised with stakeholders to discuss risks and drive awareness.
- **Policies and procedures** – In FY25, the procurement team has worked closely with stakeholders to evaluate the supply of manufactured items, specifically from overseas, to consider country risk and supplier risk. Checks were performed including manufacturing facility visits and reference checks. NCIG reviewed 7 key policies and procedures and considered reference to modern slavery risks where appropriate. As part of this process, the Modern Slavery Policy was reviewed and updated to reflect current best practices and legislative requirements.
- **Due diligence** – Further due diligence was performed on high-risk suppliers identified in FY24. These suppliers were asked to outline their measures to identify, prevent and address the risk of modern slavery in their supply chain. Evaluation of their responses and discussions with local management has not identified any areas of concern. When assessing suppliers through the RFQ process, NCIG applied a higher evaluation weighting to those based in countries identified as low risk under the Global Slavery Index. This approach supports our commitment to reducing modern slavery risks by actively favouring sourcing from jurisdictions with stronger protections and lower prevalence of exploitative practices.
- **Training** – Skills-based competency training for new hires, specifically on modern slavery risk identification continued to be delivered in this Reporting Period. Awareness training information on modern slavery was also added to our Level 1 General Induction training for new employees and contractors. In FY25, a total of 673 either new or re-induced contractors representing 137 companies successfully completed the NCIG Level 1 General Site Induction training, as well as 44 NCIG staff.
- **Stakeholder consultation** – NCIG has engaged with our customers, Port of Newcastle, Mission to Seafarers, and Port Waratah Coal Services to discuss modern slavery and how we can collaborate to minimise risks. We continue to support community organisations, including Mission to Seafarers, in their work to promote the wellbeing of seafarers, offer support, and deliver a range of vital services that make a real difference to life at sea.

# ACTIONS IDENTIFIED FOR FY26

NCIG recognises that managing and mitigating our modern slavery risks requires continuous effort. Actions identified for FY26 include:

- **Policies and procedures**
  - Ongoing review of any policies or procedures due to expire within the reporting period will be undertaken.
  - Conduct a review of contract templates to ensure best practice and related provisions are current and robust.
- **Due diligence**
  - We will continue to regularly assess suppliers based on factors like country risk, industry risk, and supplier size, using tools like the Global Slavery Index and similar benchmarks to inform assessments.
  - Improving our supplier onboarding form to include sector and country of manufacture data collection.
- **Training and awareness**
  - Continue to engage with employees and contractors highlighting our expectations and their responsibilities in relation to modern slavery. Develop and distribute internal communications to support staff in identifying and mitigating modern slavery risks.
- **Stakeholder consultation**
  - Engage with industry bodies, community organisations, and relevant stakeholders to share knowledge and best practice.
  - Explore additional industry and key stakeholder groups to engage with, collaborate and build upon due diligence and modern slavery risk assessment practices.

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

NCIG recognises the importance of regularly assessing the effectiveness of the actions we take to mitigate the risk of modern slavery occurring in our operations and supply chain.

The primary ways we are able to assess the effectiveness of our actions are:

- a) Through our grievance mechanisms – we did not receive any reports regarding instances of modern slavery or other human rights abuses within our operations or supply chain during the Reporting Period.
- b) Risk identification process – our Corporate Risk Register prioritises risks, including modern slavery, based on their risk profile and level of severity as identified during our annual risk assessment. Supplier profiles will be enhanced to include additional risk categories (sector and country risk), which will further enhance our procurement due diligence processes.
- c) Commercial and procurement processes – our contractual terms are recognised and accepted by our suppliers and contractors.

NCIG will continue to look to ways to improve our assessments and review of the actions we are taking to adhere to our modern slavery commitments. Whilst additional mechanisms and improvements are to be established in future reporting periods, NCIG is satisfied that the current controls and procedures implemented around modern slavery have been effective in mitigating and decreasing the potential of modern slavery practices and risks within NCIG's supply chain and business operations.

## CONSULTATION AND APPROVAL

NCIG does not own or control any other entity and therefore further consultation is not required.

NCIG acknowledges both its legal and moral obligations in ensuring human rights remain upheld and modern slavery risks within supply chains are mitigated. We aim to further strengthen our actions in addressing modern slavery risks for future reporting periods.

This Modern Slavery Statement was approved by the Board of Directors of NCIG on 3 September 2025 and the signatory is a Director and responsible member of NCIG and is authorised to sign this Modern Slavery statement by the Board of Directors of NCIG.



Signed (Director)

Stephen Cantwell

Name



# Newcastle Coal

INFRASTRUCTURE GROUP

COAL EXPORT TERMINAL  
30 RAVEN STREET  
KOORAGANG ISLAND NSW 2304

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**P** 02 4920 3900  
**E** [enquiries@ncig.com.au](mailto:enquiries@ncig.com.au)

**M** Locked Bag 6003, Hunter Region Mail Centre NSW 2310

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