

About this Statement

This joint statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by Bluewaters Power 1 Pty Ltd (ABN 93 106 034 879) (**Bluewaters Power 1**), Bluewaters Power 2 Pty Ltd (ABN 57 122 896 968) (Bluewaters Power 2), and Bluewaters Power Services Pty Ltd (ABN 29 603 887 387) (Bluewaters Power Services) (together **Bluewaters**), the reporting entities, to address modern slavery risks in our business and supply chains over the financial year ending 31st March 2024. This statement has been prepared in accordance with s16 of the Act.

Consultation

Bluewaters does not own or control any other entity.

This statement is made following consultation with each reporting entity and has been reviewed and approved by each Board.

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.

Risk of Modern Slavery in Bluewaters' Operations

Bluewaters' direct workforce consists of professionally qualified and skilled employees 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.

Additionally, a team of support employees, based at the Bluewaters head office in Perth, assists in various capacities including Finance & Accounting, People & Culture, Governance and IT.

Bluewaters' risk of modern slavery in its operation is considered low, due to the highly technical nature of its industry and its location (Australia).

Risk of Modern Slavery in Bluewaters' Supply Chains

Bluewaters' direct suppliers are predominantly based in low risk countries and include the supply 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.

While not directly involved in high-risk activities, Bluewaters assessed all direct suppliers as part of its modern slavery processes. New suppliers are assessed based on their location, activity and where possible, the raw materials they use. Suppliers of uniforms and electronic Goods were identified as potential areas of (indirect) vulnerability.

Bluewaters' suppliers are expected to operate in a responsible, ethical, transparent manner and in compliance with applicable laws and regulations as set out in the Purchase / Service Order General Terms and Conditions.

Governance and Effectiveness

Bluewaters is committed to proactively manage modern slavery risk in its supply chains and improve overall knowledge and transparency.

In pursuit of these objectives, Bluewaters completed a targeted audit of second tier suppliers of its Electronic Goods and Uniform suppliers. Whilst 100% of Bluewaters' first tier Electronic Goods and Uniform Suppliers are based in Australia, their suppliers are more widely spread. Only one of the identified second tier suppliers is located in a high-risk country. This supplier has policies and processes in place to minimize their involvement in modern slavery.

The low response rate (39%) highlighted challenges encountered when going beyond first tier suppliers.

However, in respect of responses that were received, none raised concerns or trigger remedial action.

Further, 61.5% of the identified second tier suppliers publish Modern Slavery Statements or have a Modern Slavery Policy indicating a good level of awareness and management of the modern slavery risks posed by their First Tier Suppliers (Bluewaters' Third Tier).

Bluewaters conducted an internal audit of its modern slavery processes, marking the third consecutive audit without significant findings. Bluewaters will continue to monitor compliance and conduct internal audits biennially.

Bluewaters' Modern Slavery Rule aligns with the Environmental, Social & Governance (ESG) Policy. The Risk, Audit and Compliance Committee (RACC) has oversight of modern slavery risk through periodic internal audits of processes and the incorporation of a modern slavery clause in Bluewaters' Standard Terms and Conditions.

To ensure all employees have an awareness of modern slavery, our reporting obligations and what modern slavery practices look like, all employees complete a Modern Slavery Awareness Training module upon commencement and complete a yearly refresher. The course covers the Australian Modern Slavery Act, reporting obligations and case studies.

2024-2025 Commitment

To help combat modern slavery within its operations and supply chain, Bluewaters will:

- Continue to assess new suppliers against modern slavery risks prior to on boarding.
- Review modern slavery processes and potential risks as part of the RACC.
- Track actions taken each year to address modern slavery and report the impact of each action.
- Continue raising awareness of modern slavery and internal protocols amongst all employees, with the annual completion of an online based Modern Slavery Awareness Training module.

Mandatory Reporting Criteria Compliance Mapping

Mandatory Reporting Criteria	Section(s) in this Statement
S16(1)(a) Identify the reporting entity	About this Statement
S16(1)(b) Describe the reporting entity’s structure, operations and supply chains	Background and Organisation Structure Risk of Modern Slavery in Bluewaters’ Operations Risk of Modern Slavery in Bluewaters’ Supply Chains
S16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risk of Modern Slavery in Bluewaters’ Operations Risk of Modern Slavery in Bluewaters’ Supply Chains
S16(1)(d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Governance and Effectiveness
S16(1)(e) Describe how the reporting entity assesses the effectiveness of these actions	Governance and Effectiveness
S16(1)(f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation
S16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	FY 2024-2025 Commitment

This statement was approved by the Board of Bluewaters in their capacity as the principal governing body of Bluewaters on 29/08/2024

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



Andrew Sutherland
Chief Executive Officer of Bluewaters
02/09/2024