

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by Newgen Power Kwinana Pty Ltd (ACN 116 827 546) (NPK) to address modern slavery risks in its business and supply chains over the financial year ending 30th June 2021. NPK does not own or control any other entity.

Background and Organisation Structure

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

The 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 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, staff 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'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.

Covid19 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:

- Reviewed 'Modern Slavery' actions and potential risks during the Risk, Audit & Compliance Committee meetings held twice per year.
- Maintains a Modern Slavery Policy 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.
- Carried out a supply chain risk assessment to identify potential high risk suppliers in existing Suppliers, through initial desktop due diligence followed by due diligence questionnaires when more information was required. It allowed NPK to downgrade the risk of Modern Slavery posed by an existing Supplier from high to low.
- Assessed new Suppliers through initial desktop due diligence followed by due diligence questionnaires when more information was required.
- Incorporated user feedback in the Supplier Checklist and Supplier Questionnaire.
- Reviewed contracts to add a Modern Slavery clause in new contracts and contracts up for renewal, when appropriate.
- 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

NPK 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.

The awareness of Modern Slavery has increased within NPK thanks to presentations to employees as part of communication meetings. The Supplier checklist and Questionnaire were improved based on Employees' suggestions.

The RACC reviewed the Modern Slavery processes to assess its effectiveness.

2021-2022 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 implement an Online Learning module on Modern Slavery and internal protocols to mitigate risks to be completed annually by all employees to increase consultation and awareness.

This statement was approved by NPK's principal governing body on 25/10/2021.



Andrew Sutherland
Chief Executive Officer
28/10/2021