

# InterGen Australia Modern Slavery Statement

For the period of 2020

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## Introduction

At InterGen, our vision is a world with stable, dependable energy for all. Our core values drive the behaviour that everyone across InterGen embraces, namely safety, integrity, teamwork, community and entrepreneurship. Through those values, we are committed to conducting our business with the highest ethical and legal standards. This includes ensuring that there is no modern slavery or human trafficking in any part of our business and being dedicated to excluding modern slavery and human trafficking from our supply chains.

This joint modern slavery statement has been prepared in accordance with the Commonwealth *Modern Slavery Act 2018* (the Act) on behalf of the InterGen Australia group.

"InterGen Australia" is comprised of its Australian parent company, OzGen Holdings Australia Pty Ltd and all subsidiary entities over which it exercises control. InterGen Australia is owned 50/50 by two overseas investors: InterGen NV and China Huaneng Group. This structure means control does not vest in either shareholder. Our corporate office is located in Brisbane, Queensland. A list of the reporting entities covered by this joint modern slavery statement is contained in the section below headed *Consultation and Approval*.

# **Structure, Operations & Supply Chain**

InterGen Australia is a privately-held power generation and development business in Australia, providing electricity and related services primarily through the National Electricity Market.

InterGen Australia has majority ownership of and operates the Millmerran Power Plant, and holds an ownership interest in the Callide C Power Plant<sup>1</sup> (operated by CS Energy), both in Queensland, Australia. Our commodity trading teams sell our electricity and related services to utilities, system operators and others in the market.

InterGen Australia's financial year is the same as the calendar year, meaning that our first reporting year under the *Modern Slavery Act 2018* is 1 Jan 2020 – 31 Dec 2020.

#### Our assets

InterGen Australia's power plants are located in Queensland as shown in Figure 1.

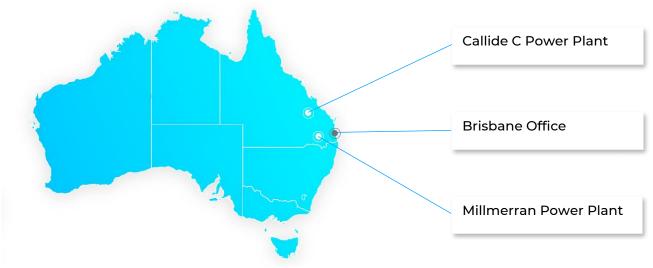


Figure 1

<sup>&</sup>lt;sup>1</sup> The Callide C project is a 50/50 joint venture between InterGen Australia and CS Energy. Callide C is operated by CS Energy who provide operations and maintenance services to the Callide C joint venture.



#### **Callide C Power Plant (Callide C)**

Callide C is a coal fired power plant which has been operational for approximately 19 Years. Located at Biloela, Queensland Callide C has a capacity of 840 MW.

#### **Millmerran Power Plant (Millmerran)**

Millmerran is a coal fire power plant located at Millmerran, Queensland. Millmerran has been operational for approximately 17 years and has a capacity of 850MW with an approximate annual output of 6,300 GWh.

#### **Our supply chain**

We employ approximately 133 people and also rely on a number of contractors and suppliers to support our business operations.

Our most frequently used direct suppliers include 180+ suppliers and an approximate spend of \$500+M during 2020.



Figure 2

During the reporting year we worked with suppliers across a diverse range of goods and services.

Refer to Figure 2 for a summary of our vendor categories

The majority of our supplier spend was for business services, engineering, mining and maintenance.

Our suppliers are located in more than 9 different countries around the world including Australia, Papua New Guinea, the Philippines, the UK, Singapore and Canada.

Our most frequently used suppliers are predominantly located in Australia.

Refer to Figure 3 for a summary of our supplier locations

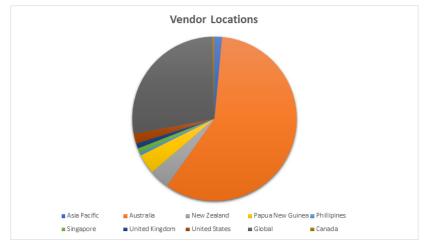


Figure 3



# **Risk of Modern Slavery**

Prior to and during the reporting period InterGen Australia assessed our supply chain to maintain a base level understanding of our overall modern slavery risk exposure. Our approach focused on our most frequently used supply chains and included ongoing assessment of the modern slavery risk associated with 180+ suppliers.

### **Risk assessment methodology**

Our risk assessment process determined an initial risk rating for each supplier based on an aggregate risk score. The risk score was calculated taking into consideration the vendor category (industry / sector), good/services provided, vendor geographical location and the vendor's governance processes.

To assist in the development of our risk assessment methodology and our interpretation of modern slavery risk we drew on both our knowledge of our supply chain and industry guidance information such as the *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities* and *Global Slavery Index*.

#### **Risk assessment outcomes**

The outcomes of our initial risk assessment, combined with supply chain and operational factors such as the quantum and regularity of expenditure and viability of alternative arrangements, was used to inform our risk mitigation steps.

Our supplier engagement program was prioritised for suppliers that were assessed to have a higher risk of modern slavery. Program actions included:

- engaging directly with these suppliers to obtain further information on their supply chains, modern slavery risks, governance processes and actions taken by the supplier to reduce the risk of modern slavery; and
- requiring (if considered relevant) additional modern slavery commitments at tender evaluation or end of contract.

# **Actions Taken to Address Modern Slavery Risk**

## Our ethics and governance standards

InterGen Australia's ethics and governance framework ensures we achieve high ethical and conduct standards, compliance with the law and our core values of integrity and corporate social responsibility:

- Our code of conduct explains our approach to business ethics, our values and our standards of business conduct, including specific statements on our relationship with suppliers and strong approach to modern slavery.
- Our compliance and conduct policies and supporting procedures provide for openness, fairness and accountability and include risk and compliance management and our tools to detect unethical, illegal, corrupt or other undesirable conduct (such tools including our whistle-blower protection program and independent Integrity Helpline).
- We maintain ongoing training and induction requirements for all staff to complete our Code of Conduct curriculum and any other mandatory training assigned on an annual basis.



#### **Procurement framework**

Prior to the reporting period InterGen Australia reviewed its procurement practices and determined areas for improvement. A new policy and procedure applicable to all procurement activity across InterGen Australia was introduced, taking effect during the reporting period. Such procurement activity included supplier selection, engagement and payment.

A key objective of our updated procurement framework is to ensure procurement of all goods and services is conducted in an honest, competitive, fair and transparent manner that demonstrates compliance with legislation (including the *Modern Slavery Act 2018*) and other industry standards.

Our procurement framework requires our people to source goods and services in a socially and ethically responsible manner, with specific reference to identifying and addressing modern slavery risk within supply chains.

Roll out of the new policy and procedure, including a refresher of our commitment to address modern slavery risk, commenced during the reporting period and will continue through 2021.

#### Other actions

In preparation for and/or during the reporting period we:

- Undertook supply chain mapping and modern slavery risk assessment.
- Introduced a new procurement policy and procedure, including the establishment of a steering committee to oversee the procurement framework rollout and actions to ensure compliance with the Modern Slavery Act 2018.
- Reviewed and updated our code of conduct.
- Commenced a supplier engagement process following our initial risk assessment including:
  - writing to relevant suppliers regarding their supply chain and modern slavery risk;
     and
  - o designing and implementing a specific modern slavery questionnaire process.
- Reviewed training requirements and sourced additional specific modern slavery training material.

#### **Future actions**

InterGen Australia intends to undertake the following actions during 2021:

- Continuation of supply chain mapping, modern slavery risk assessment and supplier engagement process commenced during 2020.
- The continued implementation and training of our new procurement policy and procedure.
- The rollout of modern slavery training to all InterGen Australia staff.
- A review and update of standard procurement contracts to incorporate specific prohibition against modern slavery and provisions regarding compliance with the Act.

## **Effectiveness of Actions**

InterGen Australia monitors the effectiveness of our compliance regime with the aim of taking relevant steps to address any instances of modern slavery.

The following indicators are used to assess the effectiveness of our modern slavery actions:

number and type of entries on disclosure registers;



- number and type of complaints received;
- number and type of compliance breaches;
- number of supplier engagements completed as part of modern slavery risk assessment processes;
- instances of taking appropriate action following any modern slavery concerns identified in the course of risk assessment or due diligence in respect of our suppliers; and
- completion of mandatory compliance training.

# **Consultation and Approval**

InterGen Australia, including the reporting entities listed below and their controlled subsidiary entities, operate under the same governance frameworks and share the same senior management.

The senior management team of InterGen Australia have been kept informed of the Modern Slavery Act 2018 requirements and the risks and actions as set out in this statement.

The following reporting entities are covered by this joint statement:

Entity name	ACN	
OzGen Holdings Australia Pty Ltd	128 655 096	
Queensland Power Company Pty Ltd	087 295 583	
IG Power (Callide) Ltd	082 413 885	

OzGen Holdings Australia Pty Ltd is the Australian parent company for the InterGen Australia group. Its wholly-owned subsidiary Queensland Power Company Pty Ltd is the majority owner of the Millmerran Power project, and its wholly-owned subsidiary IG Power (Callide) Ltd is 50% owner of the Callide C power project. No other subsidiaries of OzGen Holdings Australia Pty Ltd had a consolidated revenue over \$100M in 2020. As the Callide C power project is operated by the co-owner's parent, CS Energy, there is some reliance by IG Power (Callide) Ltd on CS Energy's actions in addressing modern slavery. CS Energy is wholly owned by the Qld government.

This statement was approved by the board of OzGen Holdings Australia Pty Ltd on 30 June 2021 after consultation with the InterGen Australia Risk Management Committee.

Signed

Managing Director/CEO, InterGen Australia Director, OzGen Holdings Australia Pty Ltd

Director, Queensland Power Company Pty Ltd

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An InterGen – China Huaneng Group Joint Venture