
1 Purpose of Statement

This modern slavery statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) on behalf of the following:

- CECEP Wind Power Australia Holding Pty Ltd (ABN 19 611 615 402) (**CECWPA**); and
- White Rock Wind Farm Pty Ltd (ABN 45 153 592 173) (**WRWF**) (together the **Reporting Entities**).

Both CECWPA and WRWF are Australian proprietary limited companies incorporated under the *Corporations Act 2001* (Cth) and registered with ASIC.

CECWPA and WRWF became reporting entities for the purposes of the Act during the period 1 January 2022 to 31 December 2022 (**Reporting Period**). This Statement is the first modern slavery statement of the Reporting Entities for the purposes of the Act.

Pursuant to section 14 of the Act, this joint Statement describes the steps taken by the Reporting Entities to assess and address modern slavery risks across their operations and supply chains over the Reporting Period.

In the Reporting Period, and as part of preparing this Statement, the Reporting Entities have:

- Monitored whether they would become reporting entities for the purposes of the Act;
- Taken steps to improve their understanding of the obligations applicable to reporting entities under the Act;
- Briefed senior management on modern slavery risks, the Australian modern slavery regime, and reporting obligations;
- Conducted a high level review of the Reporting Entities' supply chains;
- Engaged with key service providers in relation to their modern slavery policies and procedures; and
- Reviewed the modern slavery statements of their two main operation and maintenance service providers, as part of assessing the modern slavery risks in their tier 1 supply chains.

2 Our commitment

We are committed to identifying, assessing and addressing modern slavery risks in our operations and supply chains.

We will continue to review and improve our policies and practices to work towards meeting this commitment.

3 Corporate structure, operations and supply chains

3.1 Corporate structure

CECWPA is a wholly-owned subsidiary of CECEP Wind-Power Corporation Co., Ltd, a company publicly listed on the Shanghai Stock Exchange.

WRWF is 75% owned by CECWPA and 25% owned by White Rock Wind Farm New (Holding) Pty Ltd (ACN 626 531 904), which is a wholly-owned subsidiary of Goldwind International Holdings (HK) Limited, a company incorporated in Hong Kong, which is itself a wholly owned subsidiary of Xinjiang Goldwind Science & Technology Co., Ltd, a publicly listed company on the Shenzhen and Hong Kong stock exchange.

CECWPA and WRWF do not own or control any other companies or corporate entities.

Figure 1 below sets out the corporate structure of the Reporting Entities, together with their registered addresses.

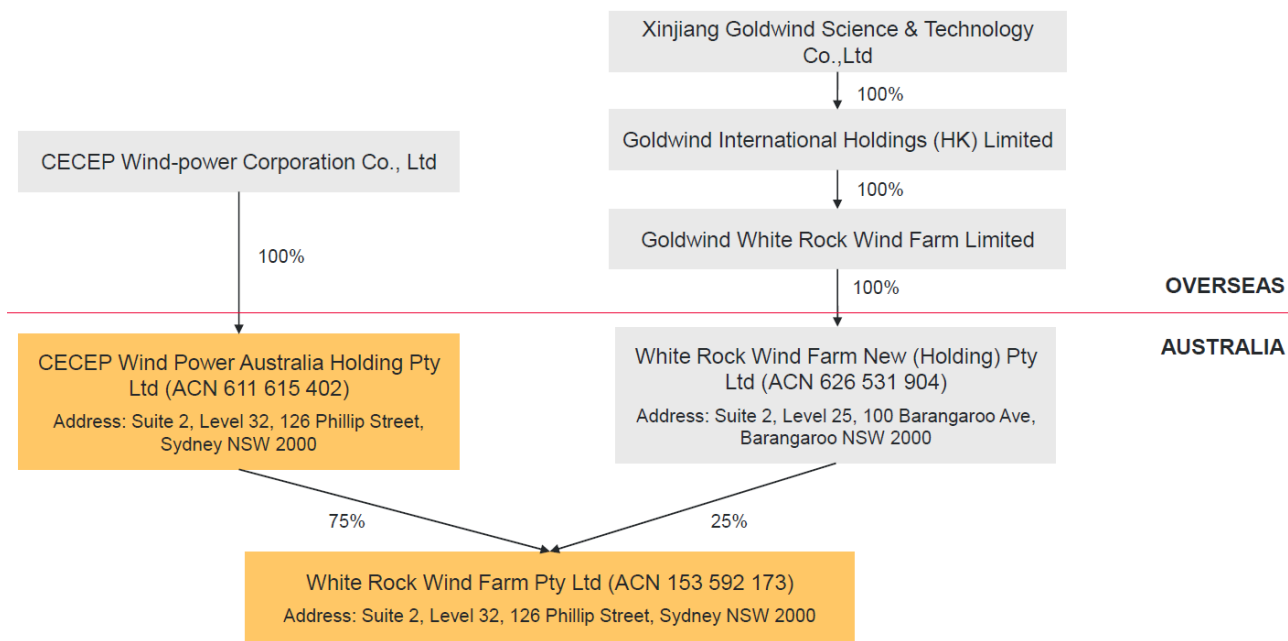


Figure 1: Corporate structure of the Reporting Entities

3.2 Operations

The Reporting Entities own and manage one wind farm in the New England Tablelands region of New South Wales, the White Rock Wind Farm Project (**WRWF Project**).

The New South Wales Government has approved construction and operation of up to 119 wind turbines at the WRWF Project, which is being constructed in stages. The total nameplate capacity of the WRWF Project is 175MW, which consisted of 70x2.5MW wind turbines. The WRWF Project is connected to the electricity transmission network through a site substation and 132KV transmission line (totalling 7.8 km).

Stage One of the WRWF Project was completed and operational in 2017. Stage Two of the WRWF Project will consist of up to 48 additional turbines, producing up to 216 MW of renewable electricity. Planning for the construction of Stage Two is currently underway.

The products of the Reporting Entities include:

- Electricity generated through wind turbines at the WRWF Project and exported to the network through a 132KV transmission line; and
- As a large renewable generator, the WRWF Project is eligible to receive Large-Scale Generator Certificates (**LGC**) from the Clean Energy Regulator. LGCs can be sold or

transferred to companies with liabilities under the Renewable Energy Target or to companies that wish to voluntarily surrender LGCs.¹

The production process of electricity through a wind farm is illustrated in Figure 2 below.

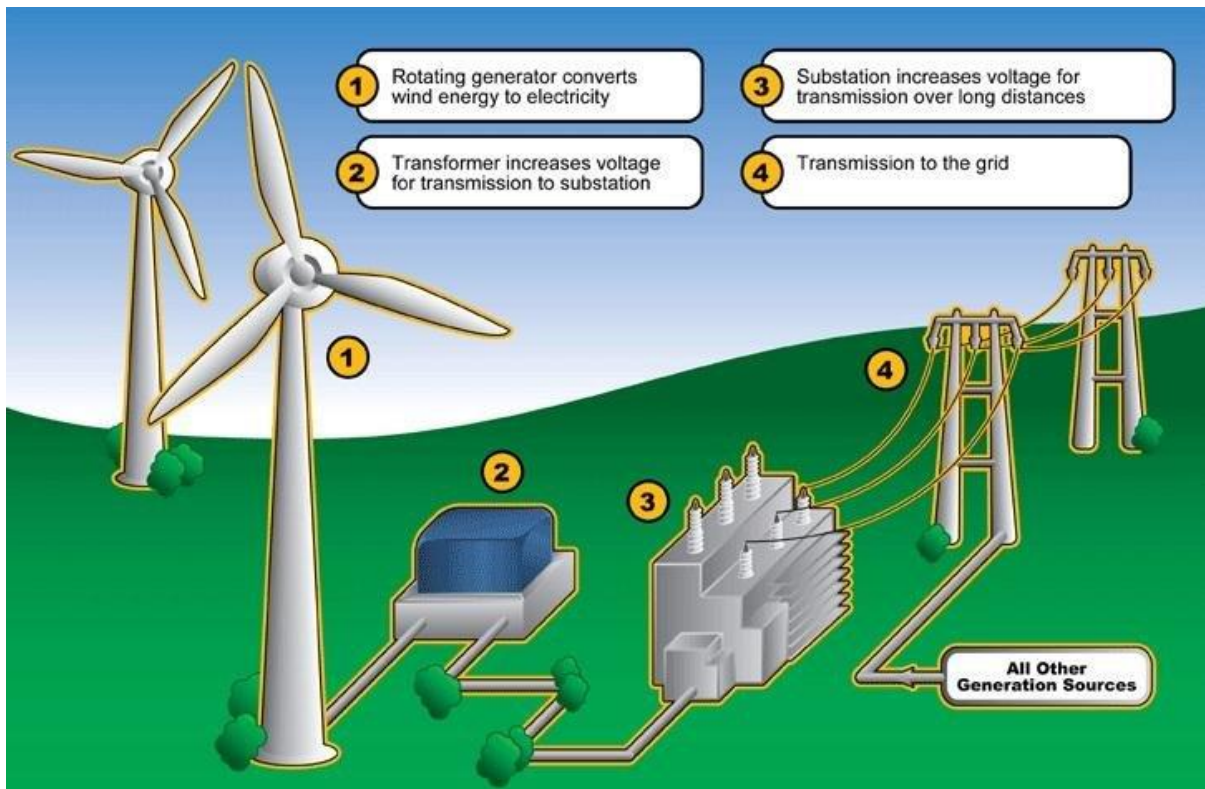


Figure 2: Wind farm production process²

The Reporting Entities carry out the following business activities within the renewable energy sector in Australia:

- Development: the investment, acquisition and development of renewable energy projects, including wind farms and battery storage; and
- Asset services: the management of project development, sales and trading, land management, approvals and compliance, and local community engagement.

The Reporting Entities provide those services through the following functional departments:

- Development team;
- Sale and trading;
- Asset management; and
- Corporate services.

As at 31 December 2022, CECWPA directly employed seven permanent employees and engaged one part-time contractor in New South Wales, Australia.

The staff of CECWPA manage WRWF. WRWF does not employ any staff. All CECWPA employees were engaged in accordance with applicable Australian labour laws.

¹ See Australian Government, Clean Energy Regulator, 'Large-scale generation certificates' (2 August 2022) available here: <<https://www.cleanenergyregulator.gov.au/RET/Scheme-participants-and-industry/Power-stations/Large-scale-generation-certificates>>.

² Data source: Vila-Brunet et al, *Electricity Generation Sustainability Index User's Guide*, (ResearchGate, 2011) available here: <https://www.researchgate.net/figure/Wind-Energy-electricity-process-flow-diagram-Solar_fig11_312589188>.

3.3 Supply chains

The Reporting Entities aim to establish relationships with local communities and support local projects. We therefore aim to utilise local suppliers and service providers wherever possible. These objectives are delivered through internal procurement policies and the Reporting Entities encourage their service providers to do the same where practicable.

During the Reporting Period, the Reporting Entities did not directly procure any goods or services from overseas suppliers.

The Reporting Entities' main categories of supplier relationships for the Reporting Period are described in the below table:

Supplier category	Supplier location
<p>1. Outsourced operation and maintenance services</p> <p>These services were primarily provided by two Australian companies, that are each engaged by WRWF on long-term operation and maintenance service agreements (O&M Suppliers).</p> <p>The first O&M Supplier provided wind farm operation and maintenance services for the WRWF Project, and provided all spare parts for wind turbine components and other major electrical plant and equipment. This O&M Supplier also provided personnel to operate the site office of the WRWF Project and managed all site purchases, including consumables for the wind farm.</p> <p>The second O&M Supplier provided operating and maintenance services for the WRWF Project substation and transmission lines. It also provided all spare parts and consumables for the operation and maintenance of the transmission line and substation.</p>	Australia
<p>2. Procurement of goods</p> <p>The Reporting Entities procured the following categories of goods during the Reporting Period:</p> <ul style="list-style-type: none"> • Office equipment and stationery; • IT hardware; and • Personal protective equipment and clothing. <p>The Reporting Entities typically source such goods locally in Australia whenever practicable.</p>	Australia
<p>3. Procurement of services</p> <p>The Reporting Entities procured the following categories of services during the Reporting Period:</p> <ul style="list-style-type: none"> • Auditing; • Compliance; • Engineering consulting; • Finance; and • Legal. 	Australia

The Reporting Entities aim to engage reputable and well-known service providers.	
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4 Risks of modern slavery

Based on our current business operations model, consultation with our O&M Supplier for the WRWF Project, review of our O&M Suppliers' modern slavery statements, and assessments undertaken to prepare this Statement, we are not aware of any modern slavery instances within our direct operations or supply chain during the Reporting Period.

While to our knowledge we have not caused or contributed to modern slavery practices, we acknowledge that there are modern slavery risks inherent to all businesses. The Reporting Entities recognise that there is a risk of being directly linked or exposed to modern slavery practices.

As a result of a high-level review of the Reporting Entities' supply chains, we have identified that our highest modern slavery risks are likely to be within our indirect supply chain (i.e. beyond tier 1) rather than in our own operations. We describe these risks in further detail below.

4.1 Risks in operations

Category	Risk indicators
<p>Office facilities</p> <p>Includes cleaning, security, hospitality, waste and maintenance services engaged by the Reporting Entities at their site and corporate office in Sydney.</p>	<p>We understand that the cleaning, security, hospitality, waste and maintenance sectors are higher risk sectors in which employees and contractors are typically more vulnerable to exploitation and modern slavery practices. In particular, these sectors are more likely to be informal, unregulated, rely on base-skilled workers, migrant labour, and utilise labour hire arrangements where there is less visibility over working conditions and labour practices.³</p> <p>The Reporting Entities address certain of these risks by directly engaging reputable Australia-based service providers.</p>

4.2 Risks in supply chains

Category	Risk indicators
<p>Operation and maintenance services</p> <p>Includes outsourced services for the operation and maintenance of the WRWF Project site, substation and transmission lines.</p>	<p>Our O&M Suppliers manage all WRWF Project site office cleaning, security, hospitality and waste services.</p> <p>The risks of modern slavery practices are similar to the risks outlined in 4.1 above.</p>

³ For example, see Walk Free Foundation and University of Nottingham, *Modern Slavery – What Business Needs to Know*, available at: < https://cdn.walkfree.org/content/uploads/2020/10/06154702/M1170847-Toolkit-Primer_DIGITAL.pdf >.

<p>Spare parts and consumables</p> <p>Includes the provision of spare parts and consumables for the operation, maintenance and repair of wind turbines, substations, and transmission lines.</p>	<p>We note that there are reported sector, product and jurisdiction specific modern slavery risks inherent to the production of wind turbine components.⁴</p> <p>We have reviewed the modern slavery statements of our O&M Suppliers and note that:</p> <ul style="list-style-type: none"> • one of our O&M Suppliers identifies that its indirect supply chain (i.e. beyond tier 1 suppliers) is prone to higher modern slavery risks, particularly in the construction, raw materials, and logistics and transport sectors; and • one of our O&M Suppliers likely procures major wind turbine components from its parent company which has manufacturing centres throughout China, including the Xinjiang region. The Reporting Entities acknowledge that this region is widely reported as a higher risk geography that is associated with modern slavery risks,⁵ which is exacerbated by limitations such as the lack of visibility into facilities and working practices in this region. <p>The Reporting Entities acknowledge these inherent risks of modern slavery in our indirect supply chains, and are committed to working towards further engagement with our O&M Suppliers to better understand and manage these risks. We have reviewed the modern slavery statements of our O&M Suppliers, which outline that they carried out extensive assessments of their respective operations and supply chains to mitigate the risks of modern slavery. On this basis, we understand that our O&M Suppliers are actively managing modern slavery risks in their operations and supply chains.</p>
<p>Personal protective equipment (PPE)</p> <p>Includes standard protective equipment and products such as masks, gloves, and test kits for COVID-19.</p>	<p>We note that certain PPE products are considered higher risk due to widely reported concerns about the manufacturing by forced labour and other forms of modern slavery, including in higher risk jurisdictions.⁶ The Reporting Entities acknowledge their limited leverage and visibility into the practices of relevant PPE manufacturers due to long and complex global supply chains, as well as the small volume of PPE procured by the Reporting Entities.</p>
<p>Office supplies and IT hardware</p> <p>Includes office equipment, laptops, monitors, keyboards, etc.</p>	<p>We note that the Global Slavery Index 2023 identifies electronics (specifically laptops, computers and mobile phones) as a higher risk category of products, due to reported forced labour and debt bondage in the electronics manufacturing industry, which is centralised in higher risk jurisdictions such as Malaysia and</p>

⁴ See Clean Energy Council, 'Addressing Modern Slavery in the Clean Energy Sector' (2022), available at: <<https://assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf>>.

⁵ For example, see Walk Free Foundation, *Global Slavery Index 2023* (2023) p.55, available at: <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>; BBC News, *US ban on imports from China's Xinjiang region takes effect* (21 June 2022), available at: <<https://www.bbc.com/news/business-61754796>>.

⁶ For example, see BBC News, *NHS to ban products of slavery after PPE concerns* (21 April 2022), available at: <<https://www.bbc.com/news/health-61183965>>.

	<p>China.⁷ We note that index also identifies electronics as the highest value at-risk products imported into Australia.⁸</p> <p>The Reporting Entities source office suppliers and IT hardware (including laptops and mobile phones) from multiple suppliers and typically directly from local Australian companies who are specialised in these areas. The Reporting Entities acknowledge their limited leverage and visibility into the practices of electronics manufacturers overseas, given the long and complex supply chains involved and comparatively low value procurement of electronics.</p>
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5 Actions taken to assess and address modern slavery risks

Actions taken by the Reporting Entities in the Reporting Period to assess and address their modern slavery risks, and in the preparation of this Statement, include:

- Monitoring whether they would become reporting entities for the purposes of the Act;
- Taking steps to improve their understanding of the obligations applicable to reporting entities under the Act;
- Briefing senior management on modern slavery risks, the Australian modern slavery regime, and reporting obligations;
- Conducting a high level review of the Reporting Entities' supply chains;
- Engaging with key service providers in relation to their modern slavery policies and procedures; and
- Reviewing the modern slavery statements of their two main operation and maintenance service providers, as part of assessing the modern slavery risks in their tier 1 supply chains.

The Reporting Entities continue to develop and review their processes to identify and manage modern slavery risks within their operations and supply chains, including in relation to due diligence and remediation. Further actions that the Reporting Entities may take as they continue to develop their response to modern slavery risks include:

- Further engagement with our O&M Suppliers to better understand the modern slavery risks in our extended supply chains, with a view to developing a collaborative and transparent approach to our modern slavery controls;
- Periodically reviewing the Reporting Entities' internal policies and procedures to ensure that they are addressing modern slavery risks in accordance with our expectations;
- Providing training to our employees on modern slavery risks and how to identify and report any modern slavery incidents; and
- Continuing to be member of the Clean Energy Council and other relevant forums.

⁷ See Walk Free Foundation, *Global Slavery Index 2023* (2023) p.147, available at: <<https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>>.

⁸ See Walk Free Foundation, *Global Slavery Index 2023* (2023) p.154, available at: <<https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>>.

6 Assessment of effectiveness

In this Reporting Period the Reporting Entities focussed on better understanding the modern slavery risks in their operations and supply chains, including by reference to their O&M Suppliers.

The Reporting Entities acknowledge that their processes to assess and address modern slavery risks in their operations and supply chain will continue to develop over time, which will extend to their frameworks to assess the effectiveness of actions taken.

At this stage, the Reporting Entities have commenced and will continue to develop annual goals, which will provide a framework to assess effectiveness at the end of the year. Those goals may include the following:

- Specific engagement with our O&M Suppliers on the topic of modern slavery risks; and
- Periodic review of our internal policies and procedures, to ensure they adequately respond to modern slavery risks relevant to our sector.

7 Process of consultation

This joint statement was prepared in consultation with both of the Reporting Entities. The Reporting Entities do not control any other entities in Australia.

This Statement was prepared by the employees of CECWPA, who manage WRWF. As described above, WRWF has no employees and is 75% owned by CECWPA.

8 Approval and signatures

This Statement was approved on 25th June 2023 by the Board of CECWPA as the controlling parent company of WRWF, being the principal governing body of CECWPA as defined in the *Modern Slavery Act 2018* (Cth).

Signed:



Name: Ying Yang

Role: General Manager CECEP WPH Australai Pty Ltd

Date: 26/06/2023

9 Disclaimer

The purpose of the statement is to provide general information only, which is current as at the date of publication.

10 Index

This Statement addresses the seven mandatory reporting criteria under the Act. The below table indicates where each criterion is addressed in this Statement.

Mandatory criterion	Page number
Identify the reporting entity.	1
Describe the reporting entity's structure, operations and supply chains.	2-4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	5-6
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.	7
Describe how the reporting entity assesses the effectiveness of these actions.	8
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	8