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## About this Statement

This joint statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) (**Act**) and sets out the actions taken by NewGen Kwinana Holdings Pty Ltd (ABN 68 116 576 955) and its subsidiaries EIT Kwinana Partner Pty Ltd (ABN 84 115 348 171) and Summit Kwinana Power Pty Ltd (ABN 77 116 803 779) as partners of the NewGen Power Kwinana Partnership (ABN 24 808 796 430) and NewGen Power Kwinana Pty Ltd (ABN 52 116 827 546 ) as agent of the NewGen Power Kwinana Partnership (the **Reporting Entities**) to address modern slavery risks in its business and supply chains over the financial year ending 30th June 2024.

This statement has been prepared in accordance with s16 of the Act.

## Consultation

Only one of the entities listed above undertakes operations, being NewGen Power Kwinana Pty Ltd (**NPK**), therefore consultation was not required with the other entities, as they do not have any physical operations or assets.

## Background and Organisation Structure

NPK is an Australian Company founded in 2005 and is the 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 Foresight Group and Sumitomo Corporation.

The Foresight Group is a leading listed infrastructure and private equity investment manager. Foresight uses its insight, expertise and guidance to actively manage assets, create flexible and innovative investment solutions for some of the largest institutional investors, and make complex investment products available to all.

Sumitomo Corporation is one of the world's leading fully integrated trading and investing companies based in Tokyo 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.

## Risk of Modern Slavery in NPK's Operations

NPK's direct workforce consists of professionally qualified and skilled employees with legal rights to work in Australia.

At the Kwinana power station, there are 26 employees responsible for the day-to-day operations, regular maintenance and monitoring of the power station to ensure it maintains its high-efficiency power generation. These employees work across multiple business disciplines including engineering, operations and maintenance.

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

NPK's 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 NPK's Supply Chains**

NPK's direct suppliers are based in Australia, or other 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, NPK 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.

NPK's 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**

NPK is committed to proactively identify, assess, and mitigate risks related to modern slavery in its supply chains and improve overall knowledge and transparency.

In pursuit of these objectives, NPK has completed a targeted audit of second tier suppliers of its Electronic Goods and Uniform suppliers. Whilst 100% of NPK's first tier Electronic Goods and Uniform Suppliers are based in Australia, their suppliers are more widely spread.

The low response rate (40%) highlighted the challenges encountered when going beyond first tier suppliers. However, in respect of responses that were received, none raised concerns or trigger remedial action. Further, 93% of the identified second tier suppliers publish Modern Slavery Statements or have a Modern Slavery policy indicating a high level of awareness and management of the modern slavery risks posed by their First Tier Suppliers (NPK's' Third Tier).

NPK conducted an internal audit of its modern slavery processes with no significant findings.

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

## **FY 2024-2025 Commitment**

To help combat the risk of modern slavery within its operations and supply chain, NPK 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;
- Conduct an annual internal audit to determine if mitigation measures have been consistently actioned by relevant business disciplines;
- Track actions taken 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 completion of 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 NPK's Operations Risk of Modern Slavery in NPK's 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 NPK's Operations Risk of Modern Slavery in NPK's 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 NewGen Kwinana Holdings Pty Ltd in their capacity as the parent entity on 28/08/2024.

This statement is signed by Andrew Sutherland in his role as the director of NewGen Kwinana Holdings Pty Ltd.



Andrew Sutherland  
 Director  
 NewGen Kwinana Holdings Pty Ltd  
 02/09/2024