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**InterGen**

# **InterGen Australia Modern Slavery Statement**

For the period of 2021

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## Introduction

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

As InterGen Australia's financial year is the same as the calendar year this statement covers the period of 1 January 2021 to 31 December 2021 (CY21).

InterGen Australia is a uniquely independent energy company. Today, we own and operate power stations in Australia that provide secure, flexible and affordable energy supplies to consumers. With well-established and experienced commodity trading teams in Brisbane, we sell our electricity and related services to utilities, system operators and others in these markets.

Our goal is to support the journey to a stable, dependable energy future. One where all our customers, stakeholders, and the wider community trusts us to deliver the flexible electricity solutions that everyone will rely on in a low carbon world. Our growth strategy supports developments that span the transitional generation mix, combining highly flexible assets with emerging, innovative technologies in low carbon sphere.

We are committed to conducting our business with the highest ethical and legal standards, including ensuring that there is no modern slavery or human trafficking in any part of our business.

During the reporting period, InterGen Australia has continued to deepen our understanding of modern slavery risks and strengthen our approach to prevent and exclude modern slavery and human trafficking from our supply chains.

## Structure, Operations & Supply Chain

### Our structure

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" 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*.

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.

### Our values

At InterGen, our vision is a world with stable, dependable energy for all. Our core values drive the behaviour that everyone across InterGen embraces. Our values are an integral part of all company policies and procedures developed at the corporate, regional and plant levels, describing how we operate on a day-to-day basis.

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<sup>1</sup> The Callide C project is a 50/50 joint venture between InterGen Australia and CS Energy. For 2021 it falls below the consolidated revenue threshold of \$100M. Callide C is operated by CS Energy who provide operations and maintenance services to the Callide C joint venture.

Safety @ Heart	Safety is at the heart of everything we do. Everyone that works with InterGen should go home safe at the end of every day. We owe it to ourselves, our families, friends, and our communities, to ensure that safety and wellbeing are our top priorities. As a business we're famous for it and no one wants that to change.
Team players by nature	Everything we achieve is the result of an incredible effort from the wide variety of different people, each bringing their own unique skills, experience and perspectives. We're sociable and we build lasting bonds, we depend on each other to succeed, and working together always makes us stronger.
Entrepreneurs in spirit	<p>We are committed to the growth of our business and we know that we have to adapt an astute entrepreneurial mindset to make this happen.</p> <p>As a business we thrive on lively, engaged intelligence and the dynamism to approach every scenario with a commercially ambitious outlook.</p>
Integrity always	Doing the right thing isn't a question of choice, it's out instinct. In all we do we strive to be open and honest, treating others as we ourselves always wish to be treated.
Community Counts	We're fundamentally connected to each other and the world around us. From national grids and global climate to the everyday world of streets and homes, our connections to the communities we are all part of give meaning to what we do.

## Our operations

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

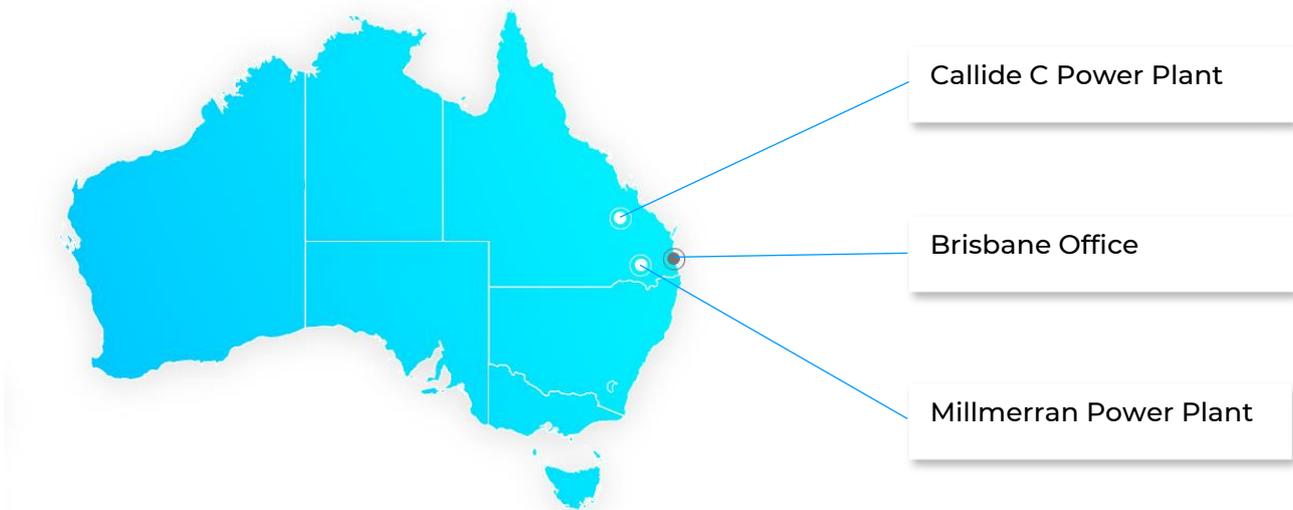


Figure 1

### Callide C Power Plant (Callide C)

Callide C is a coal fired power plant which has been operational for approximately 20 Years. Located at Biloela, Queensland Callide C has a capacity of 840MW.

### Millmerran Power Plant (Millmerran)

Millmerran is a coal fired power plant located at Millmerran, Queensland. Millmerran has been operational for approximately 18 years and has a capacity of 850MW with an approximate annual output of 6,300 GWh.

We currently employ approximately 128 people and also rely on a number of contractors and suppliers to support our business operations.

### Our supply chain

InterGen relies on its suppliers to help us deliver flexible electricity solutions to the market. It is expected that our suppliers comply with InterGen’s standards and expectations on modern slavery.

During CY21, InterGen Australia spent more than \$273 million on goods and services with more than 630 suppliers.

InterGen’s supply chain is made up of approximately 20 supplier categories, with our larger supplier categories being, mining, resources and energy, financial services, professional services and manufacturing and engineering.

A summary of InterGen Australia’s CY21 supply chain is provided in Figure 2 below.

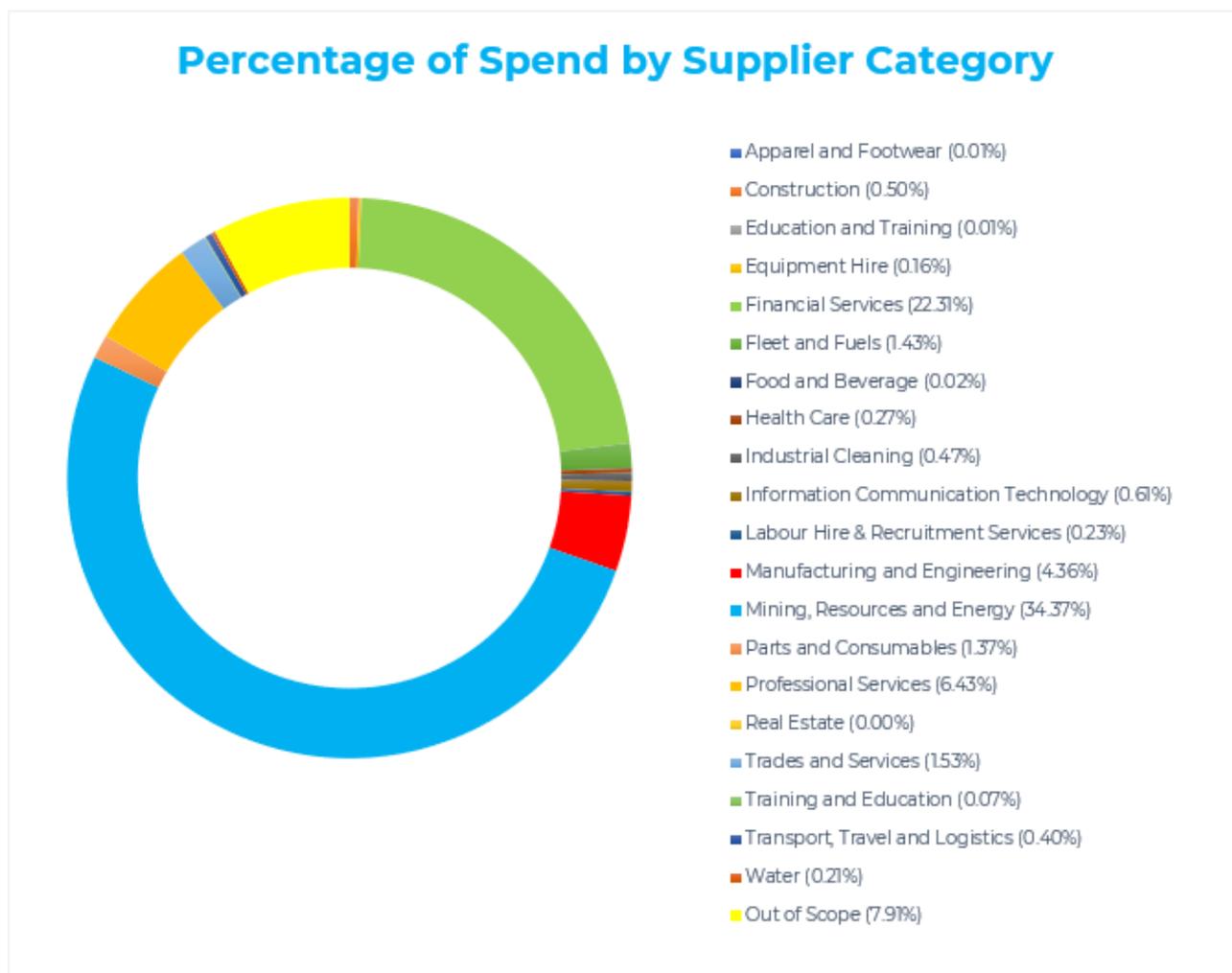
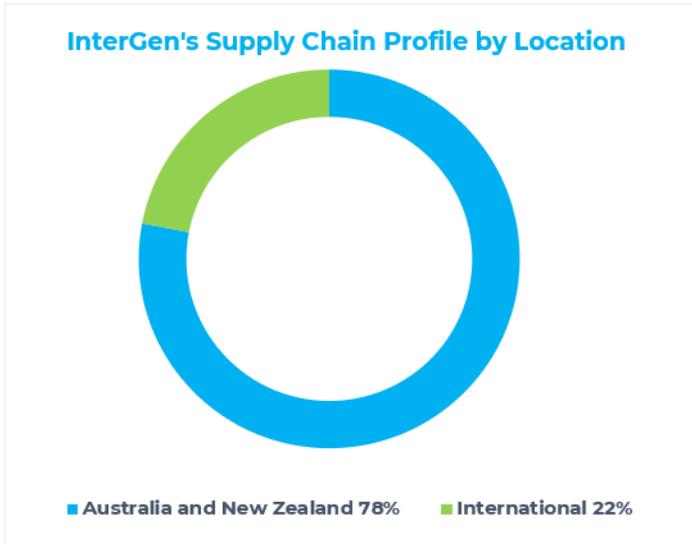


Figure 2

During the reporting year, our most frequently used suppliers were predominantly located in Australia and New Zealand.



Of the 630 suppliers sourced in CY21, 78% were located within Australia and New Zealand and 22% were located internationally, with our supply chain reaching to:

- China
- Germany
- Hong Kong
- India
- Malaysia
- Singapore
- United States; and
- Canada

Refer to Figure 3 for a summary of our supplier locations

Figure 3

Of the \$273 million spent in CY22, approximately \$184m was spent within Australia and New Zealand and approximately \$89m was spent internationally.

The International costs largely related to Financial Services and Mining, Resources and Energy industries.

Refer to Figure 4 for a summary of our supplier spend by location

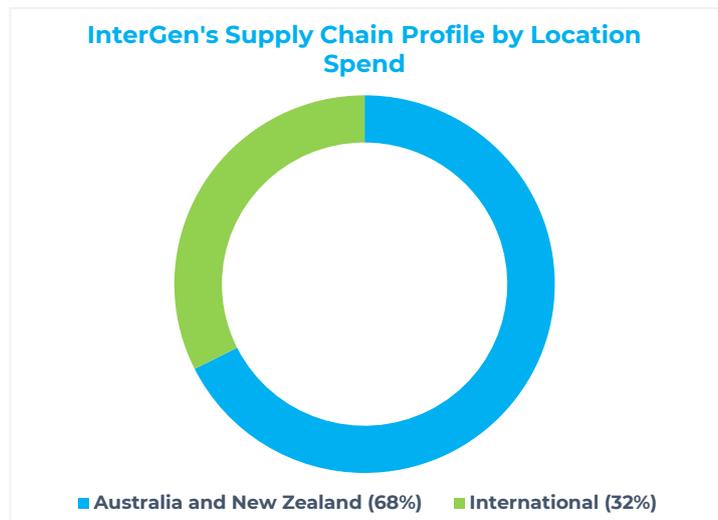


Figure 4

## Risk of Modern Slavery

InterGen Australia has implemented a risk assessment process to determine a risk rating for each supplier based on an aggregate risk score. The risk scores are calculated taking into consideration the vendor category (industry / sector), good/services provided, vendor geographical location and the vendor's governance processes. Our risk assessment process also

considers industry guidance information such as the *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities* and *Global Slavery Index*.

Our risk assessment process has identified that InterGen Australia's supply chain included suppliers within:

- Higher risk categories including construction, financial services, food & beverage, health care and mining, resources, & energy; and
- Higher risk locations including China, Hong Kong, Malaysia and Singapore.

Over 100 of these suppliers have provided a modern slavery statement outlining they have modern slavery training and risk assessment processes in place to manage modern slavery risks within their supply chain. The remaining suppliers in these categories and locations will be engaged further during CY22 to determine the appropriate supplier risk. The results of further supplier engagement, along with other findings from our assessment process, will be used to inform our ongoing monitoring and improvement actions.

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

### **Governance and ethics**

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.
- InterGen has implemented a procurement policy and procedure for the purpose of providing parameters for the procurement of goods and services and the creation of contractual arrangements with suppliers. These documents ensure that InterGen Australia's procurement activities are in line with our business plan through efficient control to manage risks and standard procurement arrangements.

### **Other actions**

During the reporting period we continued to strengthen our approach to prevent and exclude modern slavery through business initiatives such as:

- Implementing specific modern slavery training material, which now forms part of our compliance training curriculum and will continue to be rolled out across our business. At the time of preparing this statement our modern slavery training roll out has commenced and has a completion rate of ~98%.

- Establishing modern slavery governance through updates to the InterGen Australia Risk, Compliance and Audit management committee and monthly procurement reporting including monitoring of modern slavery risks and actions.
- The modern slavery risk assessment of an additional 450 suppliers and ongoing supplier engagement to determine the risks of modern slavery within their supply chains.
- The development and implementation of supplier prequalification methods to determine the risk rating of each supplier prior to commencing any procurement activity.

## Ongoing actions

InterGen Australia has either commenced or identified the following ongoing actions that will continue to be monitored and progressed during the CY22 reporting period:

- A review of our current modern slavery workflows and monitoring to further establish and embed our modern slavery operating model.
- A review, update and roll out of standard procurement contracts to incorporate specific prohibition against modern slavery and provisions regarding compliance with the Act.
- A review of our modern slavery risk assessment methodology and risk data collected to identify any improvements to our risk management approach and any suppliers that may require a targeted review or follow up.
- Develop and deliver further targeted training to our procurement staff.

## 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 current indicators are used to assess the effectiveness of our modern slavery actions:

- number and type of entries on disclosure registers | There were no entries on disclosure registers in respect of modern slavery in CY21;
- number and type of complaints received | There were no complaints raised in respect of modern slavery in CY21;
- number and type of compliance breaches | There were no compliance breaches recorded in respect of modern slavery in CY21;
- number of supplier engagements completed as part of modern slavery risk assessment processes | Over 60 suppliers were engaged in CY21, InterGen will continue to engage with suppliers in CY22.
- 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 | There were no modern slavery concerns raised by suppliers.
- completion of mandatory compliance training | Our compliance training procedure and training delivery system were updated for the ongoing implementation of specific modern slavery training (eLearning) material.

## 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

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. No other subsidiaries of OzGen Holdings Australia Pty Ltd had a consolidated revenue over \$100M in 2021..

This statement was approved by the board of OzGen Holdings Australia Pty Ltd on 30 June 2022 after consultation with the InterGen Australia Risk, Compliance and Audit Management Committee.

Signed



Brent Gunther

Managing Director/CEO, InterGen Australia  
 Director, OzGen Holdings Australia Pty Ltd  
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An InterGen – China Huaneng Group Joint Venture