

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by Bluewaters Power 1 Pty Ltd, Bluewaters Power 2 Pty Ltd, and Bluewaters Power Services Pty Ltd (Bluewaters') to address modern slavery risks in our business and supply chains over the financial year ending 31<sup>st</sup> March 2021. Bluewaters' does not own or control any other entity.

### **Background and Organisation Structure**

Bluewaters was founded in 2003 and manages the Bluewaters power station located 4.5 kilometres north east of Collie, Western Australia.

Bluewaters Power 1 and Bluewaters Power 2 are power generating assets sharing the same geographical location, which are operated by one group of employees contracted by Bluewaters Power Services (the Operator).

The Bluewaters Power power station consists of two 217MW units and runs on sub-bituminous coal, supplied under long-term contracts from the coal mining town of Collie. As the newest coal-fired power station in Western Australia, Bluewaters is an efficient unit with low emissions of this type of generator. Bluewaters supplies over 15% of the electricity in South West Interconnect System WA.

Bluewaters' direct workforce is made up of professionally qualified and skilled employees all with legal rights to work in Australia.

There are approximately 55 employees based at the Bluewaters Power station who are responsible for the day to day operations of the power station, 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 and Outage.

There are additional employees who work from the Bluewaters Power head office in Perth CBD to provide support services such as Finance & Accounting, Human Resources and IT.

### **Supply Chains**

Bluewaters' supply chains are predominantly based in low risk countries such as Australia 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.

Bluewaters' risk of Modern Slavery in its operation is considered low based on the highly technical nature of its industry.

All Bluewaters' suppliers are expected to operate in a responsible, ethical, transparent manner and in compliance with applicable laws and regulations.

Bluewaters incorporated a Modern Slavery clause in its Terms and Conditions to ensure Suppliers commit to mitigating Modern Slavery Risks in their operations.

Bluewaters' 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 Bluewaters' 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 Bluewaters' may be directly linked to modern slavery practices through the activities of other entities who we have business relations with.

Covid 19 did not adversely impact Bluewaters or its suppliers' operation.

### Proactive Steps

Bluewaters' 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.

As both assets are operated by Bluewaters Power Services, all standards pertaining to Modern Slavery apply to all Bluewaters entities.

In identifying, assessing, controlling and reviewing risks related to modern slavery, Bluewaters';

- Reviewed 'Modern Slavery' actions and potential risks during the Risk, Audit & Compliance Committee meetings held twice per year.
- Incorporated user feedback in the Supplier Checklist and Supplier Questionnaire.
- Maintains a Modern Slavery Policy for employees, contractors and third-party representatives in increasing 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 Bluewaters 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.
- Circulated information to employees to help equip them with the knowledge required for identifying modern slavery warning signs / red flags and how to raise any concerns within the business or supply chains.

### Effectiveness

Bluewaters Power 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 Bluewaters 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 their effectiveness.

### 2021-2022 Commitment

To help combat modern slavery, Bluewaters Power:

- 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.

This statement was approved by the Board of Bluewaters' on 16/09/2021

A handwritten signature in blue ink, appearing to read "A. Sutherland".

Andrew Sutherland  
Chief Executive Officer  
17/09/2021

