



**Newcastle Coal**  
INFRASTRUCTURE GROUP

# Modern Slavery

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## Policy



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# TABLE OF CONTENTS

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- 1. OVERVIEW..... 2
- 2. PURPOSE AND OBJECTIVE..... 2
- 3. SCOPE..... 2
- 4. MODERN SLAVERY RISKS ..... 2
- 5. ACTIONS WE TAKE..... 3
- 6. RAISING CONCERNS ABOUT MODERN SLAVERY PRACTICES ..... 3
- 7. COMPLIANCE WITH THIS POLICY ..... 4
- 8. BREACHES OF THIS POLICY..... 4
- 9. ROLES AND RESPONSIBILITIES UNDER THIS POLICY ..... 4
- 10. DEFINITIONS..... 5
- 11. REFERENCES..... 5
- 12. REVISION HISTORY ..... 5

## 1. OVERVIEW

Modern slavery involves the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is defined in the Modern Slavery Laws and encompasses a number of forms such as slavery, servitude, the worst forms of child labour, forced and compulsory labour, forced marriage, debt bondage, deceptive recruitment for labour or services and human trafficking.

Modern slavery (as per the Modern Slavery Laws) also extends to business conduct involving exercising control or direction over, providing finance for, or entering a commercial transaction involving slavery or an act of slave trading.

Modern slavery is a globally acknowledged issue and key focus of international organisations such as the United Nations.

## 2. PURPOSE AND OBJECTIVE

The purpose of this Policy is to outline how NCIG will fulfill its legal and ethical obligations in compliance with Modern Slavery Laws. This Policy aims to create awareness of modern slavery within NCIG.

NCIG is committed to acting honestly, ethically and with integrity in our business dealings including compliance with Modern Slavery Laws and pursuing consistency with global guidelines and standards. We are also committed to the implementation and enforcement of effective controls and systems, aiming to ensure modern slavery does not exist within our practices or global supply chains. NCIG strives to ensure that all employees and Associates have a healthy and safe workplace with no instances of modern slavery within the workplace.

## 3. SCOPE

The necessary entities and operational teams of NCIG have been consulted whilst preparing this Policy.

This Policy applies to all persons working for NCIG or on behalf of NCIG in any capacity, including all Employees, Contractors, directors, officers, any agency or seconded workers, interns, volunteers, third-party representatives, business partners and external consultants (collectively, **Associates**).

## 4. MODERN SLAVERY RISKS

The primary modern slavery risks NCIG face involve complex international supply chains. Such complex supply chains involving the procurement of goods and services for NCIG, such as:

- heavy plant;
- oils, solvents and chemicals;
- IT equipment;
- rubber and materials; and
- uniforms and personal protective equipment.

NCIG has lodged Modern Slavery Statements with the Australian Government Attorney General Department's Modern Slavery Register every financial year since 2019. Our Modern Slavery Statements outline our primary modern slavery risks, the actions we take to mitigate modern slavery risks, and how we will continue to address modern slavery within NCIG's operations and supply chains.

## 5. ACTIONS WE TAKE

To achieve our objective, we:

- seek to eliminate any direct involvement in any form of modern slavery in our own operations through our workplace health and safety policies and procedures. This includes:
  - monitoring our internal controls and procedures to identify risks of modern slavery practices in our operations; and
  - providing appropriate training materials and programs for our Employees;
- do not tolerate any instances of modern slavery practices in our workplace;
- prepare and submit our annual Modern Slavery Statement under the Modern Slavery Laws;
- have a range of policies and procedures implemented which assist with addressing modern slavery risks. NCIG have established a strong suite of corporate governance, operating procedures and policies, which are reviewed and updated, regularly and as necessary, by the Board.
- implement and continue to monitor the effectiveness of the following systems and controls to identify, reduce and mitigate the impacts of modern slavery within our supply chains:
  - expecting high standards and encouraging transparency from all of our Contractors, suppliers and other business partners;
  - consulting with our suppliers, Contractors and business partners to identify risks of modern slavery practices in our supply chains;
  - assessing and addressing any risks of modern slavery practices, including through supplier risk assessments, questionnaires and due diligence in our contractual relations and procurements processes;
  - risk management processes, including but not limited to corporate risk assessments, corporate risk registers and risk control action plans;
  - including modern slavery provisions in supplier contracts and terms and conditions;
  - modern slavery training for key personnel; and
  - stakeholder consultation and engagement.

## 6. RAISING CONCERNS ABOUT MODERN SLAVERY PRACTICES

NCIG has implemented a new induction module for new employees to raise awareness and set expectations on identification and reporting of suspected Modern Slavery within NCIG's operations.

Any person who believes or suspects that there has been or there is a potential for modern slavery in any part of our business or supply chains, and any person who believes or suspects there is a conflict with, or breach of this Policy should raise their concerns as soon as possible with their direct manager.

NCIG is committed to maintaining an open working environment in which Employees and other persons are encouraged to report instances of improper conduct without fear of intimidation or reprisal, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions of modern slavery in the business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising such concern. If an Employee or Associate believes that they have been treated in this manner, they should raise such concerns in accordance with NCIG's Whistleblower Policy.

If you are unsure if a particular action or treatment of workers or their working conditions may constitute a form of modern slavery, raise your concerns with your direct manager, or in accordance with the NCIG Whistle-blower Policy (which specifically deals with the protection of the whistle-blower).

Refer to the NCIG Whistle-blower Policy for further information.

In the event of an emergency and if someone is in immediate danger, please contact Triple Zero (000).

## 7. COMPLIANCE WITH THIS POLICY

All Employees and Associates must read, understand and comply with this Policy.

It is the responsibility of all to prevent, detect and report any modern slavery practices in any part of NCIG's business or supply chains.

## 8. BREACHES OF THIS POLICY

NCIG takes its responsibilities under the Modern Slavery laws seriously. Any Employee or Associate who breaches this Policy may be subject to further action under NCIG's Code of Conduct or Managing Performance Policies.

We may terminate our relationship with any individual and/or organisations working on our behalf if they breach this Policy. In all circumstances, we will first endeavour to engage in remedial action and processes before resorting to such measures. The particular circumstance will dictate the remedial action we are required to undertake.

We are committed to continuous improvement of this Policy and our practices in identifying and reducing modern slavery risks within NCIG's operations and supply chain. We encourage and seek feedback, comments, queries and suggestions in relation to this Policy, addressed to the Commercial Manager in accordance with the responsibilities below.

## 9. ROLES AND RESPONSIBILITIES UNDER THIS POLICY

ROLE	RESPONSIBILITIES
Board	To be aware of this Policy and approve the annual Modern Slavery Statement, ensuring it complies with all disclosure obligations under the Modern Slavery Laws.
Chief Executive Officer (CEO)	To approve this Modern Slavery Policy
Chief Financial Officer (CFO)	Overall responsibility for ensuring this Policy and Modern Slavery Statements comply with our legal and ethical obligations, and that all people under NCIG's control comply with it.
Commercial Manager (CM)	Primary and day-to-day responsibility for implementing this Policy, training, monitoring the use and effectiveness of the objectives of the Policy, and dealing with any queries about it. Such responsibilities include but are not limited to: <ul style="list-style-type: none"><li>• implementing and developing appropriate training programs and materials for all Employees and Associates.</li><li>• preparing modern slavery statements annually for NCIG; and</li><li>• monitoring, consulting and auditing internal controls and procedures in identifying modern slavery risks.</li></ul>
Executive Leadership Team	Allocate adequate resources to ensure the effective implementation of this Policy.
All Employees and Contractors	To understand and comply with this Policy. Participate in training as required.

## 10. DEFINITIONS

TERM	DEFINITION
Associates	has the meaning given to the term in this Policy.
Contractor	means an individual, a company or other entity which is engaged to provide materials and/or labour to perform a service for NCIG, including any employee of a subcontractor to such individual, company or other entity.
Employee	means any person who is employed by, acts for, or represents NCIG, including officers, directors, employees (fixed-term, permanent or temporary), Contractors, consultants and secondees wherever located.
Modern Slavery Laws	means the Modern Slavery Act 2018 (Cth).
Modern Slavery Statement	means our statement, submitted to the Australian Government's modern slavery register, on modern slavery practices within our operations and supply chain, in line with the reporting requirements of the Modern Slavery Laws.
NCIG, we, our, us	means Newcastle Coal Infrastructure Group Pty Ltd ACN 111 228 221.
Policy	means this document.

## 11. REFERENCES

- NCIG Code of Conduct Policy – PCUL.POL.05.02
- Whistle-blower Policy – COMM.POL.01.10

## 12. REVISION HISTORY

DATE	REVISION NO.	DESCRIPTION OF CHANGE	PERSONS INVOLVED
29/09/2020	2	Issued for feedback	MS, VdS, LR, SL, NJ
21/10/2020	3	Issued for review	MS
06/11/2020	4	Issued for CEO review	MS, JK, VdS
24/11/2020	5	Issued for Review	MS, JK, AJ, McR
25/11/2020	6	Issued for Board approval	
28/10/2022	7	Review	Laura Nelson, Dan Alcantara, Barry Arens, Wade Covey
07/11/2022	8	Legal Review	Michael Rochester (McCullough Robertson)
07/11/2022	9	Final review by Modern Slavery Working Group	Daniel Alcantara, Barry Arens, Wade Covey, Nathan Juchau, Laura Nelson
11/11/2022	10	Issued for acting CEO approval	John Kite, approved
14/08/2025	11	Legal and internal review	McCullough Robertson Laura Nelson Daniel Alcantara
3/9/2025	12	Issued for Board approval	