



**Newcastle Coal**  
INFRASTRUCTURE GROUP

# Modern Slavery

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## Policy



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## **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, child labour, forced and compulsory labour, forced marriage, debt bondage, deceptive recruitment and human trafficking.

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.

NCIG is committed to acting ethically and with integrity in our business dealings including compliance with Modern Slavery Laws and pursuing consistency with global guidelines and standards

## **3. 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;
- 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 and due diligence in our contractual relations and procurements processes.

## **4. RAISING CONCERNS ABOUT MODERN SLAVERY PRACTICES**

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 should raise their concerns as soon as possible with their 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.

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 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.

## **5. BREACHES OF THIS POLICY**

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

## 6. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES
Board	To be aware of this Policy and approve the annual Modern Slavery Statement
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.
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.
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.

## 7. DEFINITIONS

TERM	DEFINITION
Modern Slavery Laws	means the Modern Slavery Act 2018 (Cth).
NCIG, we, our, us	means Newcastle Coal Infrastructure Group Pty Ltd ACN 111 228 221.

## 8. REFERENCES

- NCIG Code of Conduct Policy – HR.POL.08
- HR Managing Performance Policy – HR.03
- Whistle-blower Policy – COMM.POL.003

## 9. 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