

# Modern Slavery Statement

YEAR ENDED 30 JUNE 2021





## Introduction

Port of Brisbane has zero tolerance for any form of modern slavery or human trafficking in its operations and supply chains. Port of Brisbane supports the objectives of the *Modern Slavery Act 2018 (Cth)* and is committed to tackling the risks of modern slavery in our business and our supply chains.

Port of Brisbane recognises that modern slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. Port of Brisbane recognises the importance of assessing and addressing modern slavery risks and is committed to improving responsible business practices.

## Reporting entity

This Modern Slavery Statement is made on a joint basis by:

1. Port of Brisbane Pty Ltd
2. APH Top Co Pty Ltd
3. QPH Finance Co Pty Limited
4. QPH Property Co Pty Limited as trustee for the QPH Property Trust
5. QPH Hold Co 2 Pty Limited as trustee for the QPH Hold Trust
6. QPH Hold Co Pty Ltd
7. QPH Port Acquisition Co Pty Ltd,

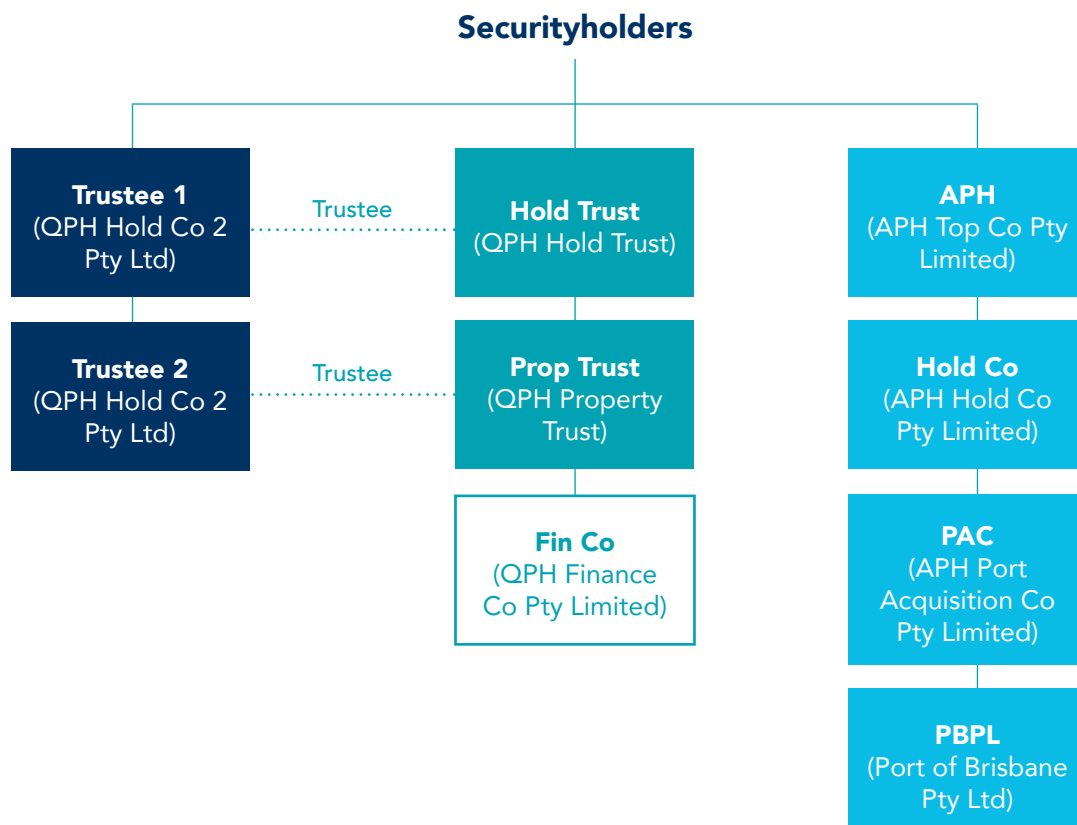
together, (the "Port of Brisbane"), in accordance with our obligations under the *Modern Slavery Act 2018 (Cth)*.

This Modern Slavery Statement is in respect of the twelve month reporting period from 1 July 2020 to 30 June 2021. The companies and trusts above are all part of the same stapled group, each company has the same board of directors and they follow the same policies and procedures. APH Top Co Pty Ltd, QPH Hold Co Pty Ltd and QPH Port Acquisition Co Pty Ltd are voluntarily reporting as these entities do not meet the required financial threshold.

## Our structure, operations and supply chain

### STRUCTURE

A structure chart showing the Port of Brisbane group entities is set out below.



## Operations

Port of Brisbane is Queensland's premier port and logistics hub. It is the third largest and one of the most diverse multi-cargo ports in the country, providing critical export and import links to world markets. On average, approximately \$50 billion in international trade is handled annually through the Port of Brisbane, which includes around 50% of Queensland's agricultural exports and 95% of its motor vehicles and containers. Port of Brisbane also delivered the Brisbane International Cruise Terminal, a world-class cruise facility that will support the long-term growth of Brisbane and Queensland's cruise tourism industry once cruising can safely resume in Queensland.

Port of Brisbane Pty Ltd is the Port Manager of the Port of Brisbane under 99-year leases from the Queensland Government. The services and operations provided by Port of Brisbane are summarised in the diagram opposite.

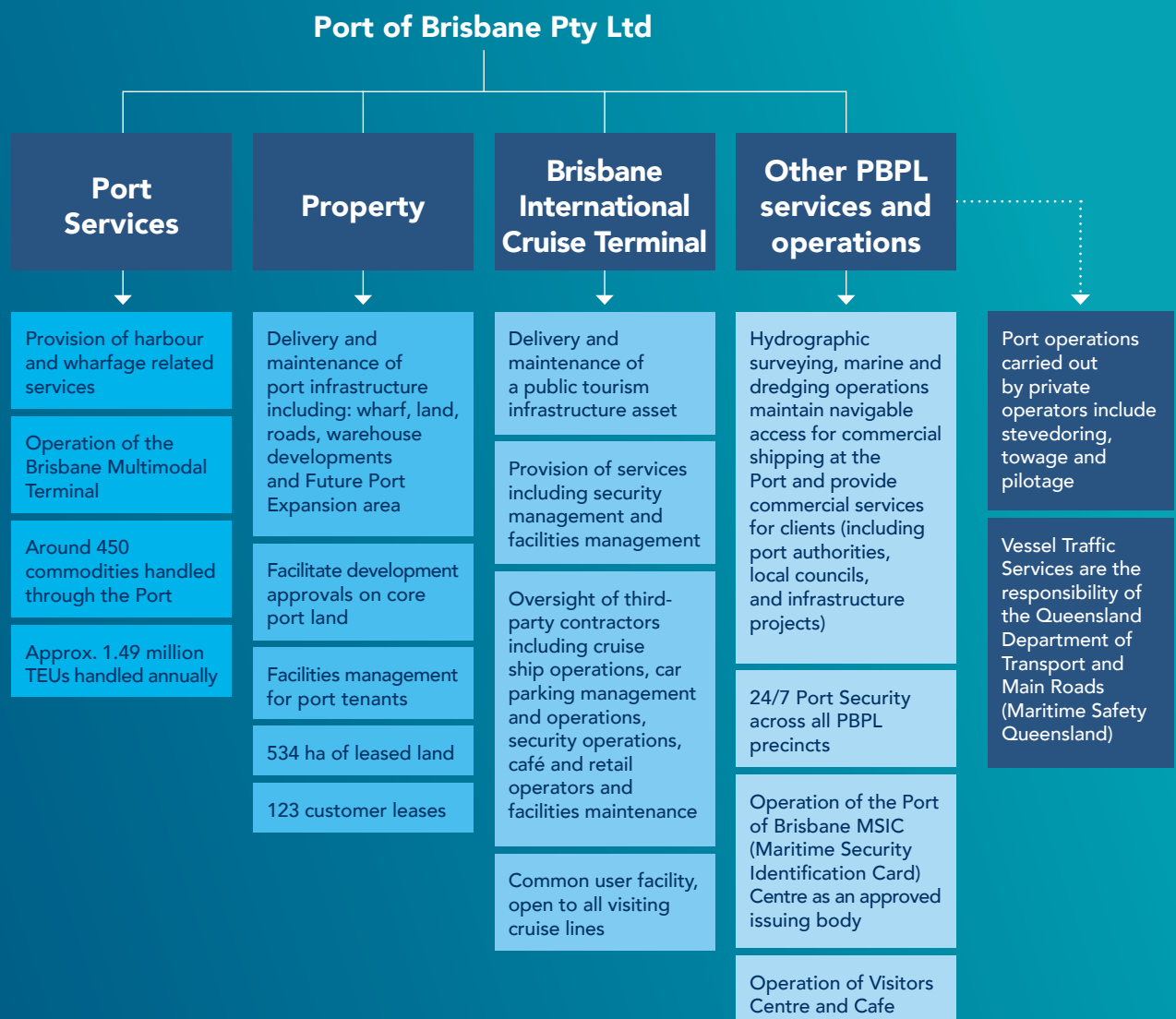
### OUR SERVICES AND OPERATIONS



PBPL leases and manages Brisbane core port land for port-related purposes. The development of this land is managed in accordance with the development codes of the *Brisbane Port Land Use Plan 2020* and the assessment protocols defined in the *Transport Infrastructure Act 1994* and the *Planning Act 2016*. This area of the business engages design and construction, property advisory, leasing, facilities management, and maintenance services suppliers.

## SUPPLY CHAINS

During the reporting period, Port of Brisbane engaged directly with 820 suppliers in varying geographical markets and industries. Of those suppliers, 98% are located in Australia, with the remaining based in Canada, Germany, France, United Kingdom, Ireland, Japan, Netherlands, Singapore, and United States of America. Port of Brisbane's major categories of procurement include construction and engineering services, facilities, repairs and maintenance, marine services, technology, advisory and consultancy, and dredge vessel maintenance and refit.



# Identifying the risk of modern slavery practices

## OPERATIONS

Port of Brisbane prioritises the health, safety and wellbeing of all employees and contractors and promotes diversity and inclusiveness. As at 30 June 2021, Port of Brisbane's workforce comprised 185 direct employees. In total, 48% of our employees are covered by collective bargaining agreements, underpinned by the *Fair Work Act*, National Employment Standards, and relevant awards. The remaining employees are engaged under individual contracts. We acknowledge that vessel crews are considered to be at higher risk of modern slavery due to the prevalence of poor working conditions and practices attributed to slavery. However, the prevalence of modern slavery practices within our marine operations is addressed by robust governance practices.

Similarly, we recognise the risk of contractors and their associated supply chains. We reviewed our *Supplier Engagement Policy* during the reporting period and plan to update this as our Modern Slavery approach develops.

The recruitment function is centralised and has a strong governance approach involving police and rights to work checks as well as maritime security requirements. To mitigate modern slavery risk further and protect our employees, we have a *Code of Conduct, Diversity and Inclusion Policy* and *Whistleblower Policy*. Based on Port of Brisbane's workforce composition, industrial instruments, internal governance, and transparent grievance channels, the risk of modern slavery within our operations is deemed to be low.

## SUPPLY CHAIN

Port of Brisbane has analysed our supply chain against four modern slavery risk indicators including sector and industry risk, product and service risk, geographic risk, and entity risk. Those industries, sectors, products and services within Port of Brisbane's supply chain that have a higher inherent risk of modern slavery have been identified in the table below.

RISK INDICATORS	PORT OF BRISBANE HIGH RISK CATEGORIES
Sector and industry risk	Construction
Product and service risk	<ul style="list-style-type: none"><li>labour</li><li>construction materials</li></ul>
	Facilities
	<ul style="list-style-type: none"><li>cleaning</li><li>security</li><li>repairs and maintenance</li><li>office consumables</li></ul>
	Technology
	<ul style="list-style-type: none"><li>electronics</li></ul>
	Food and beverage
	<ul style="list-style-type: none"><li>raw materials</li></ul>
	Textiles
	<ul style="list-style-type: none"><li>raw materials</li><li>garments (uniforms and branded merchandise)</li></ul>

Geographically, the majority of Port of Brisbane's goods and services are procured from countries with a low inherent risk of modern slavery. While many of our major suppliers are based in Australia, some are global suppliers with extended operations and supply chains across the world. Additionally, Port of Brisbane acknowledges the risk of modern slavery posed by suppliers with poor governance structures and its possible prevalence in our supply chain, including third-party labour hire. Port of Brisbane endeavours to continue to assess and monitor our suppliers and supply chain beyond tier one against the four risk indicators.

## **Actions to assess and address modern slavery risks**

### **OUR POLICIES AND RISK MANAGEMENT APPROACH**

Port of Brisbane has in place policies and a risk management framework to identify, assess, mitigate, and monitor potential risk areas where it could be exposed to modern slavery concerns. Our Risk Management Framework aligns our Risk Management Standard to the international standard ISO 31000:2018. The risk management framework continues to provide a range of tools to manage our strategic and operational (business unit-specific) risk and employees receive relevant training as required.

Port of Brisbane continues to analyse its current policies and practices against the requirements of the *Modern Slavery Act*. In the previous reporting period, we introduced a *Supplier Engagement Policy*, reviewed our *Code of Conduct* and reviewed our anonymous employee assistance hotline. During this reporting period, we revised our *Whistleblower Policy* and reviewed our *Procurement Policy* to support our zero tolerance approach to modern slavery practices.

### **DUE DILIGENCE, CONTRACTUAL AGREEMENTS AND REMEDIATION PROCESSES**

Port of Brisbane has conducted a high level risk assessment to determine which parts of the business and which supply chains are most at risk from modern slavery so future efforts can be focused on the areas that are considered of higher risk. Port of Brisbane has prioritised the further identification, understanding and assessment of the potential context and scale of its modern slavery risks.

Port of Brisbane's precedent works and supply contracts include a modern slavery provision which requires our suppliers to comply with applicable modern slavery laws and to provide information on how that supplier is managing modern slavery compliance, if requested.

We also require our contracted suppliers to hold their own suppliers to the same standards. We reserve the right to request further information from our suppliers in relation to compliance with modern slavery laws.

### **PROCUREMENT**

Port of Brisbane approved the appointment of a Procurement Advisor in the first quarter of FY22. This role will support our response to the *Modern Slavery Act* with a specific focus on further assessing and addressing modern slavery risks within our direct suppliers and associated supply chains, including by improving procurement processes.



## SUSTAINABILITY REPORT

As part of Port of Brisbane's broader sustainability goals, Port of Brisbane issued its third annual Sustainability Report for 2020/21. At Port of Brisbane, sustainability is guided by four key pillars:

- People
- Prosperity
- Partnerships
- Planet.

This report is Board-endorsed and adopted as a group-wide commitment. Several key strategic and operational initiatives underpin these four focus areas, including our focus on social responsibility and anti-slavery practices.

## TRAINING AND COMMUNICATION

Port of Brisbane endorses collaboration, awareness, and education as critically important to combat modern slavery.

In the reporting period, Port of Brisbane continued to deliver specialised modern slavery training to employees and Board members, as well as renewed annual risk awareness training incorporating modern slavery. Port of Brisbane's dedicated modern slavery training includes information on the presence of modern slavery in our global community, legislative obligations, risk factors, and actions to combat it.

## ENGAGEMENT WITH OUR SECURITYHOLDERS

Port of Brisbane has engaged with our securityholders to understand how others are dealing with modern slavery risks and to assist with the benchmarking of our own activities.

## Effectiveness of actions

Port of Brisbane acknowledges the severity of modern slavery and the value in measuring the effectiveness of our actions to improve social practices globally. In the reporting period, the following key initiatives were progressed:

- The review of our *Procurement Policy* to incorporate modern slavery expectations
- Conducted a high-level supply chain assessment against four modern slavery risk indicators
- Received approval to appoint a Procurement Advisor to strengthen supplier compliance
- Delivered dedicated modern slavery training to employees with a completion rate of 96%.

Over future reporting periods, we will review and enhance our approach to assessing and measuring effectiveness to ensure continuous improvement.







## Impact of COVID-19

Many of our supply chain stakeholders continued to face significant challenges due to the COVID pandemic. Major fluctuations in trade volumes contributed to a highly uncertain economic and operational environment, which in turn put intense logistical pressure on many of the Port of Brisbane's supply chain operators and impacted modern slavery risks. Port of Brisbane communicated with our supply chain and sought to better understand the supply chain's experiences during the COVID pandemic.

Port of Brisbane formed a COVID Response Team and has implemented a COVID Response Plan. This COVID Response Team considered health and safety issues, focussed on the health and safety of our people and implemented guidelines to minimise the possibility of workplace transmission of COVID.

## Consultation

This statement has been prepared in a collaborative manner and in consultation with each of the following entities covered by this joint statement:

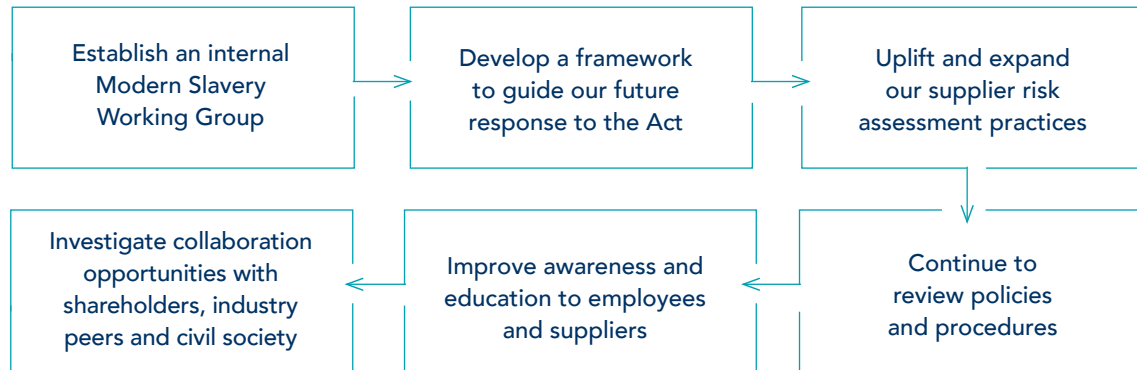
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Each of these entities has a common Board of Directors that mutually understand and recognise the importance of mitigating modern slavery risks.

In the next reporting period, Port of Brisbane endeavours to strengthen consultation amongst internal business units through the development of a Modern Slavery Working Group. Representatives from key business units will drive awareness and compliance with the Act with overarching endorsement from Executive Leadership Team and the Board.

## Next steps

Port of Brisbane will continue to strive to improve its approach to combatting modern slavery. We will seek to build our understanding of modern slavery risks in our business and our supply chains. The following activities will be pursued:



## Approval

This statement has been approved by the Board of Directors of each of Port of Brisbane Pty Ltd, APH Top Co Pty Ltd, QPH Hold Co Pty Ltd, QPH Port Acquisition Co Pty Ltd, QPH Finance Co Pty Limited, QPH Property Co Pty Limited as trustee for the QPH Property Trust and QPH Hold Co 2 Pty Limited as trustee for the QPH Hold Trust.

Signed

Guy Michael Cowan

**Chairman**

18 November 2021



**APH Top Co Pty Ltd**

ABN 96 608 192 374  
Level 33, 101 Collin Street  
Melbourne VIC 3000

**Port of Brisbane Pty Ltd**

ABN 78 143 384 749  
3 Port Central Avenue  
Port of Brisbane QLD 4178

**QPH Hold Co 2 Pty Ltd**

(ACN 147 318 447) as trustee  
of the QPH Hold Trust  
ABN 36 467 446 294  
Level 33, 101 Collins Street  
Melbourne VIC 3000

**QPH Finance Co Pty Ltd**

ABN 74 146 988 454  
Level 33, 101 Collins Street  
Melbourne VIC 3000

**QPH Property Co Pty Ltd**

(ACN 147 319 999) as trustee  
of the QPH Property Trust  
ABN 37 014 309 893  
Level 33, 101 Collins Street  
Melbourne VIC 3000

**QPH Hold Co Pty Ltd**

ABN 31 146 978 994  
Level 33, 101 Collins Street  
Melbourne VIC 3000

**QPH Port Acquisition Co Pty Ltd**

ABN 81 146 985 677  
Level 33, 101 Collins Street  
Melbourne VIC 3000