

Modern Slavery Statement

YEAR ENDED 30 JUNE 2022





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.

Criteria One: 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,

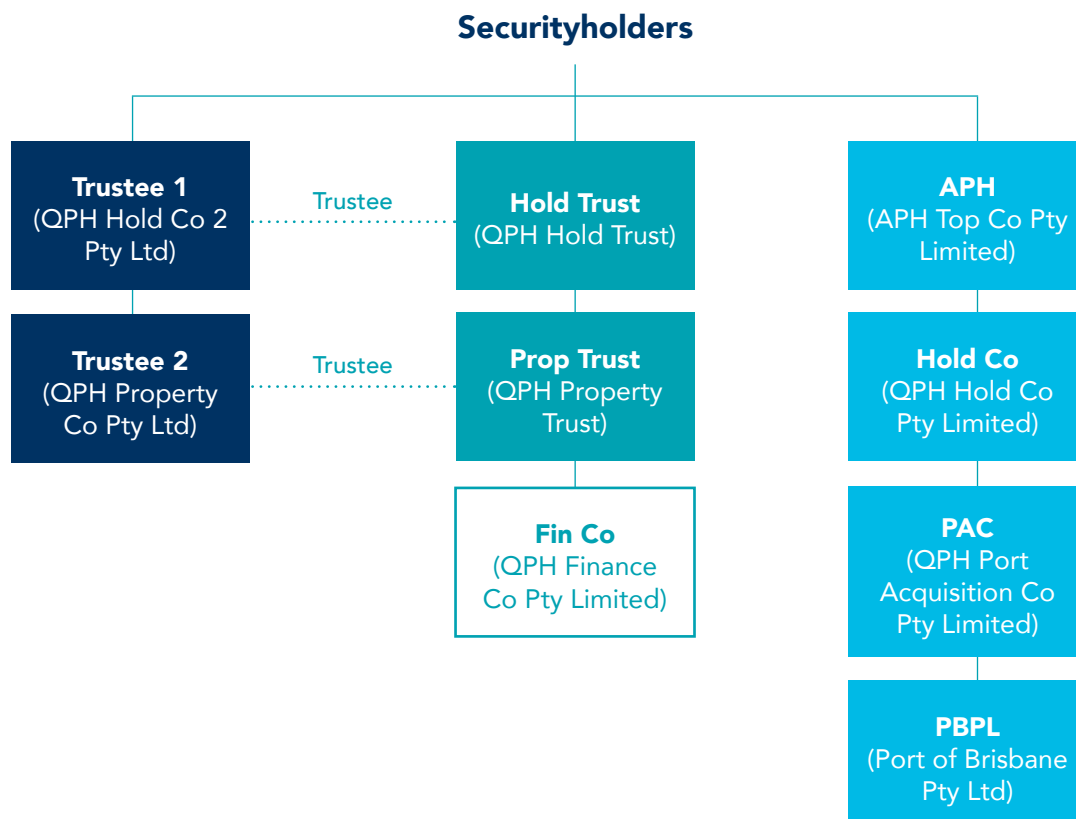
together, (the "Port of Brisbane"), in accordance with our obligations under the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement is in respect of the 12-month reporting period from 1 July 2021 to 30 June 2022. 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.

Criteria Two: Our structure, operations and supply chain

Structure

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



Operations

As Queensland's premier port and logistics hub, Port of Brisbane facilitates economic and trade growth for the state. 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 \$55 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 Pty Ltd (PBPL) also operates the Brisbane International Cruise Terminal, a world-class cruise facility that opened in June 2022 and supports Brisbane and Queensland's cruise tourism industry.

PBPL is the Port Manager of the Port of Brisbane under 99-year leases from the Queensland Government. PBPL is owned by the APH consortium, comprising four of the world's largest and most experienced infrastructure investors:

- QIC Private Capital Pty Ltd on behalf of its managed funds and clients
- IFM Investors
- Caisse de dépôt et placement du Québec
- Tawreed Investments Ltd, a wholly-owned subsidiary of the Abu Dhabi Investment Authority.

The services and operations provided by Port of Brisbane are summarised in the diagram opposite.

PBPL leases and manages Brisbane Core Port Land for port-related purposes including the provision of key core port infrastructure to support and facilitate the flow of trade through the Port.

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.

Supply chains

To support the delivery of Port of Brisbane's operational and strategic activities, suppliers and contractors are engaged across varying geographic markets and industries. During the reporting period, 738 direct suppliers were engaged. Of those suppliers, 96% are located in Australia, with the remaining based in Canada, Germany, France, United Kingdom, Ireland, Japan, Netherlands, Singapore, Belgium, New Zealand and United States of America. Port of Brisbane's major categories of procurement include construction and engineering services, vessel maintenance and refit, facilities, repairs and maintenance, technology, advisory and consultancy.

Our services and operations



Port Services	Property	Brisbane International Cruise Terminal	Other PBPL services and operations	
Provision of harbour and wharfage related services Operation of the Brisbane Multimodal Terminal Around 450 commodities handled through the Port Approx. 1.53 million TEUs handled annually	Delivery and maintenance of port infrastructure including: wharf, land, roads, warehouse developments and Future Port Expansion area Facilitate development approvals on core port land Facilities management for port tenants 571 ha of leased land 136 customer leases	Delivery and maintenance of a public tourism infrastructure asset Provision of services including security management and facilities management Oversight of third-party contractors including cruise ship operations, car parking management and operations, security operations, café and retail operators and facilities maintenance Common user facility, open to all visiting cruise lines	Hydrographic surveying, marine and dredging operations maintain navigable access for commercial shipping at the Port and provide commercial services for clients (including port authorities, local councils, and infrastructure projects) 24/7 Port Security across all PBPL precincts Operation of the Port of Brisbane MSIC (Maritime Security Identification Card) Centre as an approved issuing body Operation of Visitors Centre and Café	Port operations carried out by private operators include stevedoring, towage and pilotage Vessel Traffic Services are the responsibility of the Queensland Department of Transport and Main Roads (Maritime Safety Queensland)



Criteria Three: Identifying the risk of modern slavery practices

Operations

As of 30 June 2022, Port of Brisbane's workforce comprised 184 direct employees (including casuals) and 6 contractors. Half of our employees are covered by Enterprise Agreements and the other half are engaged by individual contracts. All of Port of Brisbane's industrial instruments are underpinned by the Fair Work Act, National Employment Standards, and relevant awards. Port of Brisbane protects the health, safety, and wellbeing of its employees through robust governance including responsible recruitment, an Employee Code of Conduct, and a Whistleblower Policy.

We acknowledge there is an inherent risk of modern slavery in shipping due to the prevalence of poor working conditions and practices attributed to slavery. However, the risk of modern slavery practices within our marine operations and vessel crews is deemed low because of PBPL's robust governance practices.

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

Modern slavery risk can be dependent on several intersecting factors. Port of Brisbane has analysed its supply chain against four modern slavery risk indicators including sector and industry risk, product and service risk, geographic risk, and entity risk.

Sector and industry risk	Sectors and industries with high-risk characteristics in the production of goods or delivery of services.
Product and service risk	Goods and services linked to dangerous or sub-standard working conditions, low-skilled labour or vulnerable populations, and exploitation or underpayment.
Geographic risk	Countries with weak rule of law, limited human rights protections, conflict, and socio-economic factors like poverty.
Entity risk	Entities with poor governance structures, complex sub-contracting arrangements or poor and concealed recruitment standards and practices.



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 below.

Construction

- *labour*
- *construction materials*
- *repairs and maintenance*

Commercial Services

- *cleaning*
- *landscaping services*
- *security*

Technology

- *electronics*

Food and beverage

- *raw materials*

Textiles

- *raw materials*
- *garments*

Consumables

- *office consumables*
- *branded merchandise*
- *Personal Protective Equipment*

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 enhance our supplier assessment and monitoring capabilities to capture risks levels beyond tier one suppliers.

Port of Brisbane acknowledge the ongoing risk of modern slavery in the maritime industry to Seafarers. Although our level of control has been identified as low, we intend to work with stakeholders to positively address any identified issues and raise awareness on risk indicators.

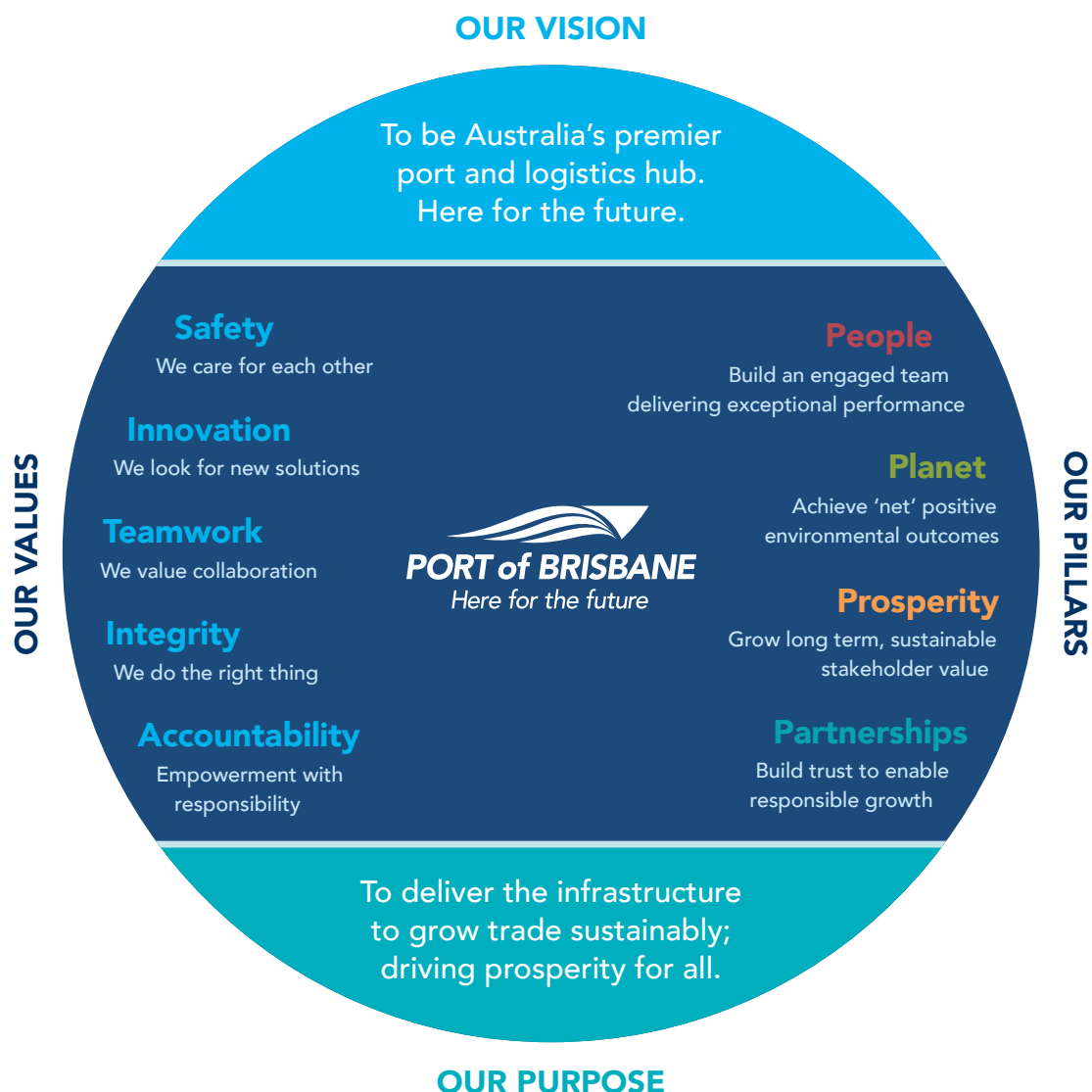
Criteria Four: Actions to assess and address modern slavery risks

Updated Business Strategy

PBPL's five-year business strategy came into effect from 1 July 2021 following consultation with employees, Executive Leadership Team and Board. The new strategy acknowledges the changing global landscape and megatrends that we believe will impact our business and the world around us. It also considers the evolving commercial opportunities and risks.

Our strategic framework is underpinned by our refreshed Vision, Values and Purpose and, importantly, puts our Sustainability Program at its core.

The "Four Ps – People, Partnerships, Prosperity and Planet" – are the platforms from which we plan and conduct our business every day. Key strategic and operational initiatives underpin these four focus areas, including our focus on social responsibility and anti-slavery practices. PBPL's sustainability achievements are outlined in our [2021/22 Sustainability Report](#).



Modern Slavery Steering Committee

During the Reporting Period, PBPL established its first Modern Slavery Steering Committee, comprising representatives from across our business with overarching endorsement from the Executive Leadership Team, Audit and Risk Committee and Board. The Steering Committee members from our Legal, Risk, Procurement, Finance, People and Performance, Facilities, Corporate Relations and Sustainability teams engage to:

- develop and drive initiatives to help PBPL reduce the risk of modern slavery
- ensure a whole of business, consistent approach
- leverage experts from business units within PBPL to provide advice, influence and create awareness
- review and monitor progress and effectiveness of actions.

Internal Governance Structure



Modern Slavery Action Plan

PBPL's Modern Slavery Steering Committee collaboratively led the development of a three-year action plan focused on four key areas including governance, due diligence, awareness and collaboration. The Steering Committee will drive initiatives in each focus area with the aim to continuously improve year on year.

Governance	• People • Policies • Procedures • Contractual arrangements	Awareness	• Communication • Reporting • Training
Due diligence	• Risk management • Operational risk monitoring	Collaboration	• Engagement • Collective Action • Networking

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 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 focus on areas considered to be higher risk. To continuously improve our assessments, Port of Brisbane has developed a Supplier Risk Assessment Questionnaire. This Questionnaire will help identify the maturity of direct suppliers in relation to anti-slavery practices and better inform PBPL's relationship with them. The Supplier Risk Assessment Questionnaire will be released in the 2023 financial year.

Policies

Port of Brisbane continues to monitor its existing policies and procedures against the requirements of the Modern Slavery Act. In this Reporting Period, our Recruitment and Onboarding Standard was updated to incorporate anti-slavery practices; this Standard will be approved and published internally in the 2023 financial year.

Contractual Agreements

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. Additionally, PBPL's Standard Order Conditions were also updated to incorporate anti-slavery obligations.

Supplier Engagement Review

Supplier engagement is a key process at PBPL and is the function of evaluating, selecting, engaging, managing and reviewing suppliers to deliver goods and services. PBPL's existing supplier engagement processes are being reviewed to ensure our procurement is value adding and captures our broader goals and responsibilities, including respecting human rights.

Communication

During the Reporting Period, PBPL delivered internal communication to employees on the risks of modern slavery. The establishment of the Modern Slavery Steering Committee created a further opportunity to discuss the seriousness of modern slavery and its relevance to PBPL. An internal information repository was also created to provide employees access to information on modern slavery indicators, grievance mechanisms, and PBPL-specific resources.



Training

In the reporting period, Port of Brisbane continued to deliver tailored modern slavery training to all new employees, as well as 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.

The Modern Slavery Steering Committee led the refresh of PBPL's internal modern slavery training module to include PBPL-specific information and questions; this mandatory training became available for employees from July 2022 and must be completed annually by all employees.

Collaboration

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

Engagement with Industry

During the Reporting Period, PBPL representatives attended Port's Australia Working Groups dedicated to Legal, Finance and Environment. Information relating to PBPL's modern slavery response and initiatives was presented, encouraging discussion and idea sharing within each discipline area.

Engagement with Not-For-Profit

Port of Brisbane has an existing relationship with the Mission to Seafarers presence located at the Port of Brisbane. Mission to Seafarers has centres located around Australia and work with government and port users to improve the treatment of seafarers and practices in Australian waters. Our relationship is underpinned by a Memorandum of Understanding. Mission to Seafarers offers shore-based practical and emotional support to seafarers, as they undertake their essential, oftentimes dangerous work. Port of Brisbane provides Mission to Seafarers with a shore-based welfare centre at the Port of Brisbane to deliver their services and provides other funding opportunities. Additionally, the half-yearly Port Welfare Committee is attended by a Port of Brisbane representative. Port of Brisbane recognises the importance of Mission to Seafarers on improving seafarer welfare within the shipping industry and will continue to foster and develop this relationship.

Criteria Five: 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 within our business and also globally. With support from the Steering Committee each year we reflect on the progress we have made and actions for the following year. In the reporting period, the following key initiatives were progressed:

- introduction of a new 5-year business strategy centred around our values and sustainability commitment
- establishment of a Modern Slavery Steering Committee, which led the development of a three-year action plan
- updating of PBPL's Recruitment and Onboarding Standard to incorporate practices to reduce risks of modern slavery
- anti-slavery clauses continued to be incorporated in new and precedent contracts, as well as in our Standard Order Conditions
- development of a Supplier Risk Assessment Questionnaire for future distribution
- initiation of a supplier engagement process review to realign our practices to our core business strategy and commitments
- dedicated modern slavery training delivered to 26 new employees with a completion rate of 80%
- review of PBPL's current modern slavery training module, updated to include PBPL-specific information and questions to improve its relevance to employees
- development of an internal information repository dedicated to modern slavery and PBPL's approach to combatting it, accessible to all employees
- collaboration with securityholders, industry bodies, and not-for-profits to share learnings and create change.

Criteria Six: Consultation

This statement has been prepared in a collaborative manner and in consultation with each of the entities covered by this joint statement (as listed in Criteria One). Each of these entities has a common Board of Directors that mutually understand and recognise the importance of mitigating modern slavery risks, as well as supports the function of PBPL's Modern Slavery Steering Committee. The Steering Committee convenes periodically and drives cross-functional engagement, delivery and consistency in our approach to combatting modern slavery.

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 in next reporting period:

Governance	Continue to review and incorporate anti-slavery clauses and improve remediation practices.
Due Diligence	Strengthen the assessment of Port of Brisbane's risk management practices through the Supplier Risk Assessment Questionnaire.
Awareness	Continue to raise awareness of modern slavery risks internally with employees, as well as externally with suppliers, customers and other stakeholders.
Collaboration	Expand collaboration with not-for-profits, industry peers, and securityholders.

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.

This statement is signed by Guy Cowan in his role as the Chair 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 on 18 November 2022.

Guy Michael Cowan

Chairman

18 November 2022



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