

Modern Slavery Statement

YEAR ENDED 30 JUNE 2025



Acknowledgement of Country

Port of Brisbane acknowledges the Traditional Custodians of the lands, seas and waters across Australia. We honour the wisdom of Aboriginal and Torres Strait Islander Elders past and present and embrace future generations.



Introduction

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.

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) (the “**Act**”) and is committed to tackling the risks of modern slavery in our business and our supply chains.

Our vision	To be Australia's premier port and logistics hub. Here for the future				
Our purpose	To provide the infrastructure to grow trade sustainably; driving prosperity for all				
Our values	SAFETY We care for each other	INNOVATION We look for new solutions	TEAMWORK We value collaboration	INTEGRITY We do the right thing	ACCOUNTABILITY Empowerment with responsibility

A SUSTAINABLE BUSINESS — OUR 2030 SUSTAINABILITY PROGRAM

Our 2030 Sustainability Program is framed by four pillars, each underpinned by focus areas to ensure we deliver on our 2030 goals.

Pillars and their 2030 goals	 PEOPLE	 PROSPERITY	 PLANET	 PARTNERSHIPS
	Create an engaged, diverse and responsive culture	Deliver efficient and sustainable economic growth	Achieve positive net environmental benefit	Enable responsible growth
Focus Areas each with a 2030 goal and annual targets to keep our progress on track	<ul style="list-style-type: none"> • Safety • Health and wellbeing • Culture • Personal development • Robust governance 	<ul style="list-style-type: none"> • Port development • Supply chain enablement • Asset management • Sustainable procurement • Digital transformation 	<ul style="list-style-type: none"> • Air quality • Energy efficiency • Climate change resilience • Resource management • Water quality • Biodiversity 	<ul style="list-style-type: none"> • Customer partnerships • Community partnerships • Research and industry partnerships • Engagement and education

At Port of Brisbane, sustainability is at the heart of our business strategy. We are committed to playing our part in the global transition towards a more sustainable future. Putting sustainability at the centre of our business ensures Port of Brisbane remains focused on delivering positive outcomes that support the Port of Brisbane's sustainable development and growth. This approach to sustainability continues to influence our decision making and goal setting. All employees are encouraged and empowered to identify and activate opportunities that promote sustainable outcomes in their work. Key strategic and operational initiatives underpin Port of Brisbane's key sustainability focus areas, including a focus on social responsibility and anti-slavery practices.

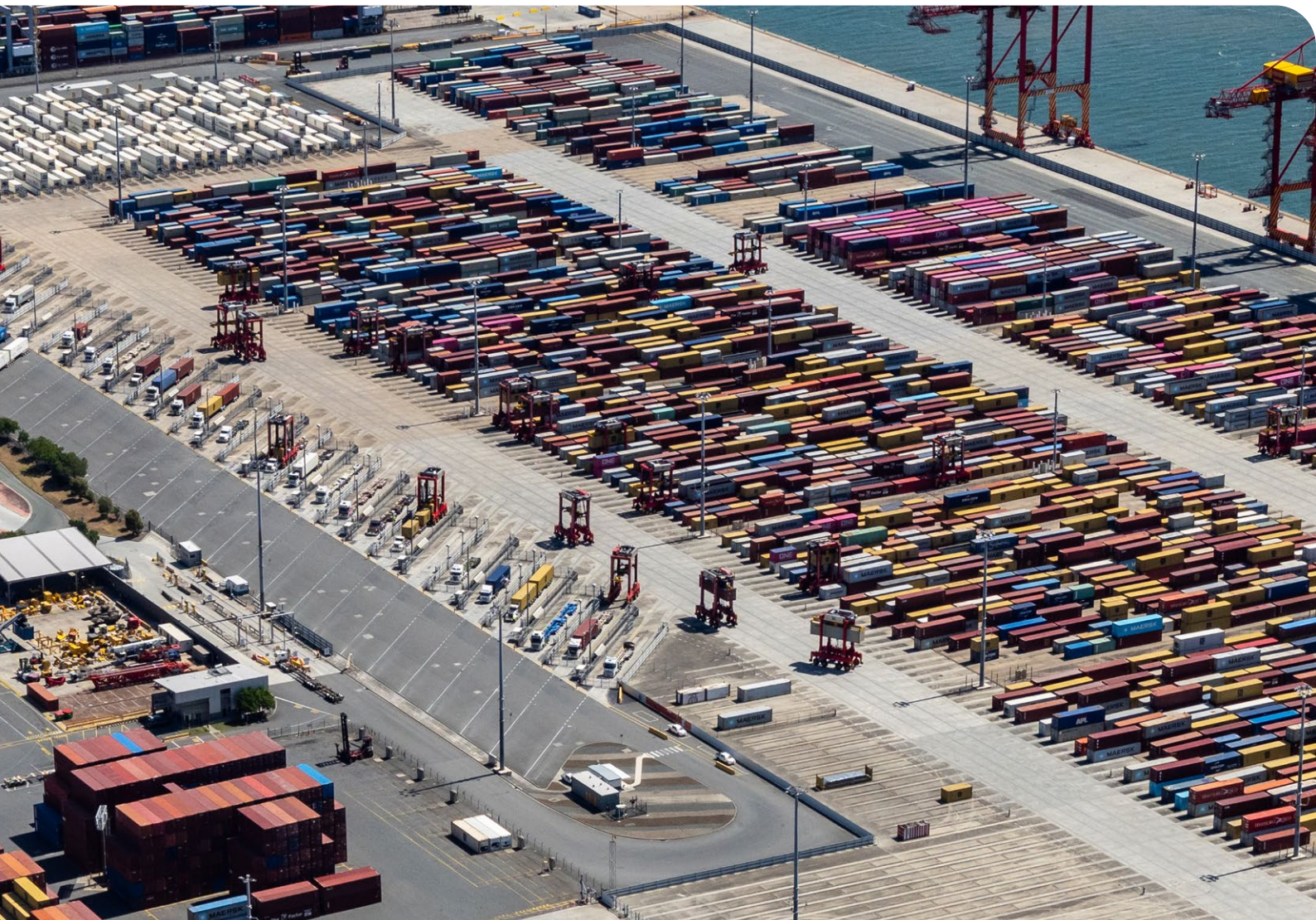
Port of Brisbane's sustainability progress and achievements are outlined in its [2024/25 Sustainability Report](#).

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; and
 7. QPH Port Acquisition Co Pty Ltd,
- (together, the “**Port of Brisbane**”), in accordance with our obligations under the Act.

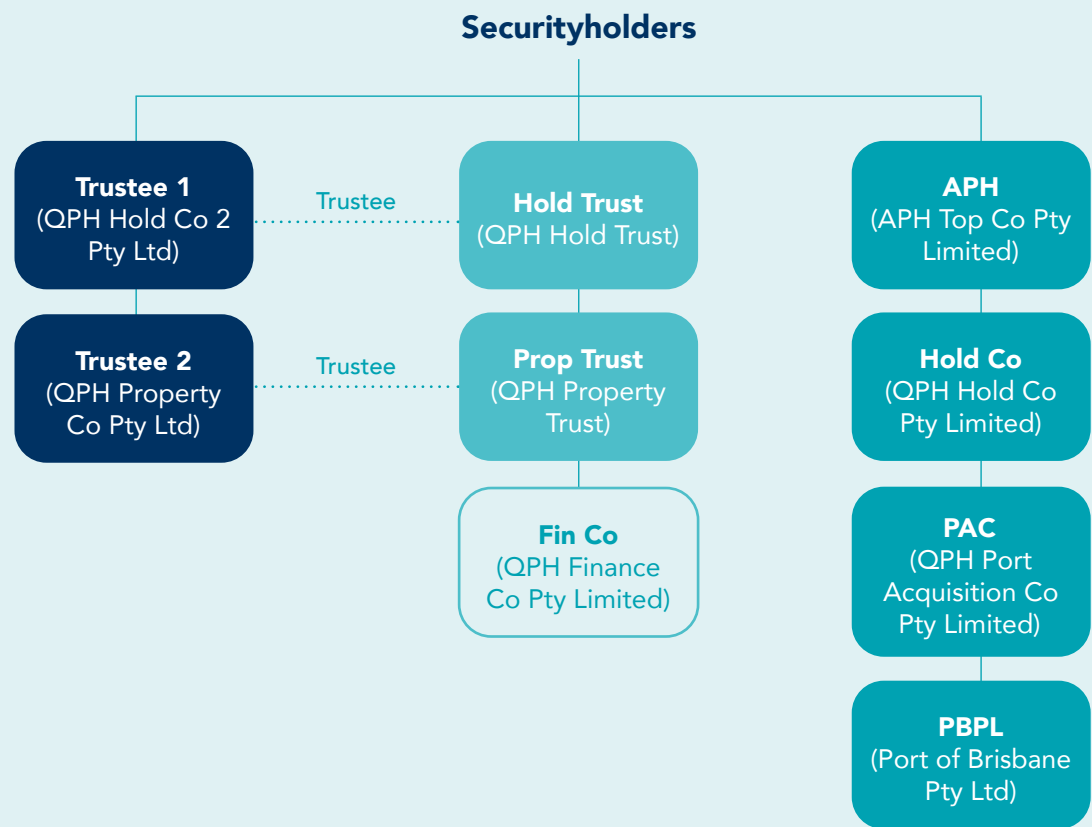
This Modern Slavery Statement is in respect of the 12-month reporting period from 1 July 2024 to 30 June 2025. The companies and trusts above are all part of the same stapled group, and each company has the same Board of Directors and is governed by the same policies and procedures. APH Top Co Pty Ltd, 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 under the Act.



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. In FY25, approximately \$73.5 billion in international trade¹ was handled through the port. On average, around 50% of Queensland's agricultural exports and 95% of its motor vehicles and containers are handled through the port annually.

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

- QIC Private Capital Pty Ltd (on behalf of its managed funds and clients);
- IFM Investors;
- La Caisse; and
- Platinum Tawreed Investments A 2010 RSC Limited (a wholly-owned subsidiary of the Abu Dhabi Investment Authority).

The services and operations provided by Port of Brisbane are summarised in the diagram (over page).

¹ Australian Bureau of Statistics 2025, Customised report.

Our services and operations



Port of Brisbane Pty Ltd



As at 30 June 2025

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, 817 direct suppliers were engaged. Of those suppliers, 96% were located in Australia, with the remaining based in United Kingdom, Singapore, United States of America, Netherlands, Canada, Norway, Germany, Ireland, Japan, New Zealand, Sweden, and France. Port of Brisbane's major categories of procurement include construction, vessel maintenance and refit, facilities, repairs and maintenance, technology, advisory and consultancy services.

The table below illustrates the geographic distribution of supplier spend for Port of Brisbane.

Country	No. of Suppliers	% of Spend
Australia	784	99.425%
United Kingdom	9	0.162%
Singapore	4	0.162%
United States of America	4	0.083%
Netherlands	4	0.067%
Canada	4	0.042%
Norway	2	0.023%
Germany	1	0.013%
Ireland	1	0.012%
Japan	1	0.004%
New Zealand	1	0.003%
Sweden	1	0.002%
France	1	0.002%
Total	817	100%



Criteria Three: Identifying the risk of modern slavery practices

Operations

As of 30 June 2025, Port of Brisbane’s workforce comprised 251 direct employees (including casuals) with 50% covered by Enterprise Agreements and the remaining engaged by individual contracts. Port of Brisbane also engages contractors, for project management and operational services, via agency/labour hire. These engagements are based on the dynamic needs of Port of Brisbane’s operational requirements.

A summary of Port of Brisbane’s workforce composition is below.

Total PBPL Employees	251	
	Male	Female
Gender breakdown	164	87
Full time	152	72
Part time	1	8
Casual (non-guaranteed hours employees)	11	7
Temporary	2	0
Permanent	151	80
Casual (non-guaranteed hours employees)	11	7

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, health, safety and wellbeing policies and a Whistleblower Policy.

It is generally acknowledged that seafarers are inherently more vulnerable to modern slavery due to the prevalence of poor working conditions and exploitative practices in the shipping industry. While the risk of modern slavery within our marine operations and vessel crews is deemed low due to Port of Brisbane’s robust governance framework and oversight, we recognise the ongoing risk of modern slavery in the maritime industry to seafarers who may transit through the Port. Although our level of control has been identified as low, we maintain co-operative working relationships with authorities that oversee the activities of vessels, including Australian Border Force and the Australian Maritime Safety Authority.

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 continues to review its supply chain against four modern slavery risk indicators including sector and industry risk, product and service risk, geographic risk, and entity risk. These indicators are explained further in the table below.

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 (e.g. high poverty rates).
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 that are the highest contributor of modern slavery risk within Port of Brisbane's supply chain are listed below.

Construction and Repairs & Maintenance

- Labour
- Construction materials (i.e. rubber, iron, steel, metal, paints, chemicals, lumber, cement, plaster)
- Fabricated metal products (i.e. roofing, scaffolding, tools)

Commercial Services

- Cleaning
- Landscaping
- Security

Technology

- Electronics
- Renewable energy

Fuel Products

- Extraction and refinement of product

Food and beverage

- Agricultural and aquaculture products
- Catering services

Textiles

- Raw materials
- Garments

Consumables

- Office consumables
- Branded merchandise
- Personal protective equipment

While many of Port of Brisbane's key suppliers are based in Australia, some operate globally with extensive supply chains. The countries in which Port of Brisbane's suppliers are located are generally considered low risk. 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.

In this reporting period Port of Brisbane engaged a third-party service provider to undertake a comprehensive assessment of its supply chain to better inform our understanding and approach to modern slavery risk. The outcome of this assessment is outlined in Criteria Four of this Modern Slavery Statement.

Criteria Four: Actions to assess and address modern slavery risks.

Modern Slavery Steering Committee

Following a review of the initiatives delivered in financial year 2024 reporting period, Port of Brisbane’s Modern Slavery Steering Committee updated its charter and continued to progress initiatives in the 2025 reporting year. The steering committee comprises of representatives from across the business with overarching endorsement from the Executive Leadership Team, Audit and Risk Committee and Port of Brisbane Board.



Port of Brisbane Board

- Responsible for approving both governing policies and standards that outline performance expectations of Management along with Port of Brisbane’s annual Modern Slavery Statement in accordance with the Act.

Audit & Risk Committee

- Endorses the Port of Brisbane’s governing policies and standards for approval by the Port of Brisbane Board.
- Oversees the systems and frameworks that report Port of Brisbane’s ongoing compliance with the Act.

Executive Leadership Team

- Responsible for overseeing execution of Port of Brisbane strategies and policies in their respective functions.

Modern Slavery Steering Committee

- Cross-functional committee of representatives from Legal, Risk, Procurement, Finance, People and Performance, Technology, Infrastructure, Marine, Port Services, Sustainability and Corporate Relations teams engage to oversee the development and delivery of Port of Brisbane’s modern slavery response initiatives.

Governance

Port of Brisbane has robust governance processes, underpinned by a mature business management system (BMS) framework, as well as strong management structures with clearly defined roles outlining responsibility and accountability. The BMS framework drives Port of Brisbane’s commitment to quality processes, practices, and activities, while providing guidance on sound, ethical, socially responsible, sustainable, and innovative ways of operating. During the year, Port of Brisbane undertook a surveillance audit verifying the continued compliance of our management systems against ISO9001:2015 (Quality), ISO14001:2015 (Environment), and ISO45001:2018 (Health and Safety) standards.

Third-Party Risk Assessment

Port of Brisbane engaged an external service provider, FairSupply, to conduct a modern slavery risk assessment of its supply chain. The risk assessment leverages publicly available global trade data and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics. FairSupply’s proprietary algorithm overlays this data with global estimates of modern slavery at the national and industry level. The methodology assigns a globally benchmarked risk rating to each supplier based on the prevalence of modern slavery in the country and industry in which they operate. This information enabled Port of Brisbane to validate the risk profile of its immediate supplier base of 817, as well as gain deeper insight into potential risks to tier 10 of its supply chain. It also supports more informed due diligence and remediation planning.

Using a risk rating scale of low to high, the assessment found that 80% of PBPL’s suppliers pose a low risk of modern slavery with the remaining 20% identified as moderate risk or moderate low risk. No suppliers were assessed as high risk.

Risk Rating	% of Suppliers	% of Spend
Low	80.42%	95.39%
Moderate Low	19.22%	4.60%
Moderate	<1%	<1%
Moderate High	0%	0%
High	0%	0%

With this insight, Port of Brisbane updated its existing supply chain risk mapping to incorporate sectors and industries that were previously not identified as having a higher inherent risk of modern slavery relative to our supply chain. These additional risk areas include:

- fabricated metal products (i.e. roofing, scaffolding, tools);
- fuel products, particularly the extraction and refinement of product; and
- catering services.

Within 10 tiers of Port of Brisbane’s supply chain, FairSupply identified a concentration of modern slavery in tier one to four. This is likely driven by the significant presence of labour services in our supply chain, which has an elevated risk of modern slavery. For example, the construction and commercial services sector (i.e. cleaning, landscaping, security, waste services) account for nearly 44% of Port of Brisbane’s total supply chain risk. These industries often rely on seasonal workers and tiered sub-contracting arrangements, which can increase the likelihood of poor labour practices.

FairSupply presented these insights to Port of Brisbane's Modern Slavery Steering Committee to enhance understanding and raise awareness of supply chain risk. Port of Brisbane intend to continue its engagement with FairSupply and advance its assessment of its supply chain and due diligence practices.

Further details on the FairSupply Risk Assessment Methodology can be found in Appendix 1 of this Modern Slavery Statement.

Supplier Risk Assessment Questionnaire

Port of Brisbane's Supplier Risk Assessment Questionnaire is used to help identify the maturity of direct suppliers in relation to anti-slavery practices and better inform Port of Brisbane's relationship with them.

Case Study

During the 2025 reporting period, Port of Brisbane tendered its contracted horticulture and landscaping services. This service contract is for routine and preventative services to ensure the ongoing safety, aesthetics and suitability of the Port of Brisbane's higher profile landscaped areas and gardens, including operational sites, common areas and key leased property. There is a higher inherent risk of modern slavery in the provision of landscape and maintenance services given the vulnerability of workers and the oftentimes multi-tiered nature of supply chain. While none of the

suppliers are required to report in accordance with the Act, the assessments demonstrated the suppliers understand and actively mitigate modern slavery risk. All four suppliers indicated they have medium to high visibility of their direct supply base and have sound working conditions, grievance mechanisms, training, and company policies related to modern slavery, anti-bribery, corruption, and fraud. The contract was also tendered with Port of Brisbane's standard modern slavery contract clauses.

Policies

In early 2025, Port of Brisbane's Procurement Policy, and Recruitment, Selection and Onboarding Standard was reviewed to ensure alignment with responsible and ethical business practices. Strengthening controls of this nature aim to protect vulnerable populations, ensure accountability, and create a safe reporting culture.

Training

During the reporting period, Port of Brisbane's annual modern slavery and human trafficking training module was refreshed. The condensed training module will be delivered to employees every 12 months to complement the more comprehensive onboarding training provided to new employees.

This annual refresher training presents key information on the global prevalence of modern slavery, legislative obligations, risk factors, and measures to address it. Where possible, the content has been localised to Port of Brisbane. The condensed module aims to improve employees learning experiences and aims to keep employees informed of ethical and responsible business practices.

TSHD Brisbane Induction

In this reporting period, Port of Brisbane updated its contractor and visitor induction for the *TSHD Brisbane*. All contractors and visitors to the *TSHD Brisbane* must complete the induction for awareness and understanding of hazards, risks, legislative requirements and site-specific processes and access. Information on modern slavery has been included to ensure those completing it are informed about the associated risks particularly given its prevalence in the maritime industry.

ISO 20400 Sustainable Procurement

During the reporting period, Port of Brisbane focused on building a strong foundation to effectively integrate its Sustainable Procurement Strategy into PBPL's existing procurement framework. The work undertaken included revising its Procurement Policy, Standard and Procedure to align with the key principles described in *ISO 20400 (Sustainable Procurement)*, conducting a mapping exercise to understand its influence and interest in relation to sustainable procurement, and commissioning a formal risk assessment to systematically assess the sustainability risks and opportunities of our procurement activities. These initiatives enhance Port of Brisbane's efforts to mitigate and manage procurement related risks, including modern slavery and unlock opportunities that support our sustainability objectives.

Grievance Mechanisms

Port of Brisbane is committed to upholding its core company values and fostering a safe and inclusive environment where everyone feels valued, supported, protected, and empowered to be the best they can be. During the reporting period, Port of Brisbane included information on its external, confidential and independent grievance channel in its 'Contractor Guidelines' document provided to all directly engaged supplier or contractors, and on its external website. To ensure transparency and enable individuals to raise concerns, without prejudice and with full support, Port of Brisbane sought to make this information more accessible for employees, customers, contractors and suppliers to 'Speak Up' and report misconduct and other serious workplace issues.

Reporting Concerns

If you have concerns about modern slavery or broader human rights issues relating to Port of Brisbane's operations or supply chain, you can safely and anonymously voice your concerns.

If a person wishes to make a disclosure to STOPline, or request additional information before making a disclosure, the contact details are:

Phone: 1300 30 45 40

Email: Portbris@stopline.com.au

Postal: Port of Brisbane c/o Stopline, PO Box 403, Diamond Creek, VIC 3089

More information about STOPline can be found at <http://portofbris.stoplinereport.com/>

Communication

Port of Brisbane shared information on its Modern Slavery Statement and its anti-slavery initiatives with employees and the broader community. Port of Brisbane's June 2024 financial year Modern Slavery Statement was shared with its employees in January 2025 in an 'all employee' communication channel, Team Brief, as well as the port community via the December 2024 Port News email newsletter reaching tenants, stevedores, and shipping agents.

Collaboration

Port of Brisbane is committed to advocating awareness of modern slavery within its community and sphere of influence. In this reporting period, Port of Brisbane sought new communication and collaboration channels with industry peers, whilst continuing to engage with its securityholders.

Community Partnerships

Port of Brisbane recognises the importance of Mission to Seafarers in improving seafarer welfare within the shipping industry. Port of Brisbane has continued its long-time partnership with Mission to Seafarers Brisbane, from fully subsidising the Brisbane Seafarer Centre lease, managing building maintenance, having representation on its Management Committee and hosting its Port Welfare Committee. At the Port of Brisbane, the Brisbane Seafarers Centre supports on average over 7,000 visiting seafarers every year.

Port of Brisbane teams have continued to donate clothing for visiting seafarers and this year through community funding, we extended our support to provide funding that contributed to the purchase of a new minibus for the centre. Team members also celebrated Day of the Seafarer to recognise the invaluable contribution of seafarers within our team, as well as those globally. Mission to Seafarers Brisbane is also now a partner in the Port of Brisbane's employee volunteering program, which enables employees to contribute up to two days each year supporting a non-for-profit organisation.



Criteria Five: Effectiveness of actions

After every reporting period, Port of Brisbane's Modern Slavery Steering Committee reflects on the progress made. Assessing the effectiveness of Port of Brisbane's actions in reducing modern slavery risk will, over time, contribute to the improvement of social practices within the organisation, its supply chains and broader community.

In the reporting period, effectiveness was demonstrated through the following initiatives:

- Review of the Modern Slavery Steering Committee Charter and continued progress on initiatives.
- Validated and improved Port of Brisbane's understanding of modern slavery risks across 817 direct suppliers and up to tier 10 of its supply chain.
- Anti-slavery clauses continued to be incorporated in new and precedent contracts.
- Shared Port of Brisbane's June 2024 financial year Modern Slavery Statement and associated initiatives with all employees and the port community to raise awareness.
- As of 30 June 2025, 76% of new and existing employees completed Port of Brisbane's online modern slavery training modules. While this is a decline from previous years, Port of Brisbane intend to re-engage with its employees to drive completion rates of its newly developed and released modules.
- Strengthened Port of Brisbane's existing relationship with Mission to Seafarers Brisbane.

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 Port of Brisbane's Modern Slavery Steering Committee. The Steering Committee drives cross-functional engagement, delivery and consistency in our approach to combatting modern slavery.

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.

Guy Michael Cowan

Chairman

19 November 2025

Appendix

Appendix 1 - FairSupply Risk Assessment Methodology Summary

1. As discussed in Criteria Four of this Modern Slavery Statement, Port of Brisbane applied the FairSupply methodology to 817 suppliers. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.
2. Incorporating company spend data throughout global markets, we have utilised external consultants, FairSupply, who use proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain.
3. FairSupply uses a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
 - a. The United Nations' (UN) System of National Accounts;
 - b. UN COMTRADE databases;
 - c. Eurostat databases;
 - d. The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
 - e. Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
 - a. The UN Guiding Principles on Business and Human Rights;
 - b. The Global Slavery Index;
 - c. International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
 - d. The United States' Reports on International Child Labour and Forced Labour.
5. FairSupply apply a proprietary algorithm to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.
6. This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Port of Brisbane's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
 - a. The individual suppliers and industries with the most elevated risk of modern slavery;
 - b. Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
 - c. Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world;
 - d. An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk; and
 - e. Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.



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