

Modern Slavery Statement

YEAR ENDED 30 JUNE 2020





Introduction

This is the first Modern Slavery Statement to be made on a joint basis by Port of Brisbane Pty Ltd, APH Top Co Pty Ltd, QPH Finance Co Pty Limited, QPH Property Co Pty Limited as trustee for the QPH Property Trust, QPH Hold Co 2 Pty Limited as trustee for the QPH Hold Trust and QPH Port Acquisition Co Pty Ltd ("Port of Brisbane") in accordance with the *Modern Slavery Act 2018 (Cth)*. This modern slavery statement is in respect of the twelve month reporting period from 1 July 2019 to 30 June 2020. These companies and trusts are all part of the same stapled group and follow the same policies and procedures and share many common suppliers. 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 approach

Port of Brisbane has zero tolerance for any form of modern slavery or human trafficking in its operations and 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 has taken and continues to take steps to improve our practices to combat the risk of modern slavery and human trafficking both within our operations and in that of our supply chains.



Our structure, operations and supply chain

Port of Brisbane Pty Ltd is the port manager of the Port of Brisbane. Port of Brisbane facilitates trade through the commercial management of an efficient and customer focused port. To this end, Port of Brisbane provides the necessary infrastructure through the sustainable planning and development of new facilities, and maintenance of existing facilities. Port of Brisbane is also responsible for the security and protection of the Port of Brisbane's infrastructure and assets, and the provision of risk-based security services. Port of Brisbane procures a variety of services and supplies including construction services and materials, property maintenance, landscaping, security, cleaning and other contract labour services.

Port of Brisbane 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 Port of Brisbane Port Land Use Plan 2015 and the assessment protocols defined in the *Transport Infrastructure Act 1994* and the *Sustainable Planning Act 2009*. This area of the business engages design and construction, property advisory, leasing, facilities management and maintenance services.

Port of Brisbane is responsible for maintaining navigable access to the port for commercial shipping. For this purpose, Port of Brisbane has its own dredging fleet, including an ocean-going dredge, TSHD Brisbane. Services required for this area of the business include dredge maintenance and refit services, sometimes through overseas suppliers in areas of higher modern slavery risk.

Port of Brisbane has developed and constructed the Brisbane International Cruise Terminal and will be welcoming cruise liners and passengers once the cruise industry recommences operation. As part of its role in operating the Brisbane International Cruise Terminal, Port of Brisbane intends to procure services and supplies such as forklift and baggage handling services, security, cleaning, landscaping and maintenance.

Port of Brisbane operates the Brisbane Multimodal Terminal (BMT), which is the rail interface with container terminals. The BMT handles the rail transportation of imported and exported containers through the port. Port of Brisbane procures fuel and maintenance services for operations at the BMT.

Port of Brisbane has a workforce of approximately 170 people. Port of Brisbane has over 1,000 direct suppliers which are predominantly located in Australia. Port of Brisbane also engages with suppliers in other countries such as Singapore, UK and Canada. Port of Brisbane acknowledges that suppliers are likely to have extended supply chains which procure services and supplies from a variety of jurisdictions and industries.

Risks

Port of Brisbane acknowledges that modern slavery is a risk to the organisation and extended supply chain. After identifying those suppliers who might have extended risk in their businesses and processes.

OUR POLICIES AND RISK MANAGEMENT APPROACH

Port of Brisbane has in place a number of policies and risk management processes to identify, assess, mitigate and monitor potential risk areas where it could be exposed to modern slavery concerns. The risk of modern slavery is assessed within the Group's risk management framework, at both an operational level through its procurement activities, and at a strategic level.

We have undertaken an analysis of the Group's current policies and practices against the requirements of the Modern Slavery Act. Our policies support our zero tolerance approach to slavery practices including our Code of Conduct, Whistleblower Policy and our anonymous employee assistance hotline. We are committed to taking reasonable steps to ensure that genuine concerns of unacceptable behaviour can be reported in good faith with protection for whistleblowers.

DUE DILIGENCE AND REMEDIATION PROCESSES

Port of Brisbane has reviewed and risk-assessed our existing supply chain and considers the risk of modern slavery in that supply chain to be low. The majority of services and supplies sourced by Port of Brisbane are sourced from within Australia. Port of Brisbane does however recognise that there may be some suppliers which are potentially at a higher risk to modern slavery given the industry in which they operate (e.g. construction, property maintenance and contract labour services). Port of Brisbane will continue to work with all of its suppliers to minimise the risk of modern slavery.

Port of Brisbane has conducted high level initial risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so initial efforts can be focussed on the areas that are considered high risk. Port of Brisbane has prioritised the identification and understanding of the potential context and scale of modern slavery risks in its supply chain.

Where appropriate, as informed by the risk assessment, Port of Brisbane will engage directly with new suppliers in respect of modern slavery to understand the measures that supplier has in place to ensure that modern slavery is not present within that supplier's business or supply chain.

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

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

Training and communication

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

Employees and board members have completed specific Modern Slavery training as well as annual risk awareness training which includes an ESG risk module with information on modern slavery.

Our effectiveness in dealing with Modern Slavery

Port of Brisbane will continue to improve its existing processes to deal with modern slavery, including by:

- 1 Continually reviewing our current business policies and processes with regard to recruitment and treatment of employees;
- 2 Continuing to ensure regular training for our employees is undertaken to raise awareness of modern slavery, including site management training for site based employees;
- 3 Requiring our supply chain to update their modern slavery information on a regular basis and annually auditing our supply chain on their updated information. This will be a continuing process; and
- 4 Working with key stakeholders to ensure continued focus on, and compliance with, relevant legislation.

Our next steps

Our next steps will include:

- Ensure appropriate investigation into and plan the engagement strategy with proposed new suppliers.
- Maintain Modern Slavery compliance in relevant risk frameworks and processes, particularly at Finance and Strategic levels.
- Ensure periodic reporting to the Port of Brisbane Board.

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

Signed



Guy Michael Cowan

Chairman

18 March 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