

Modern Slavery Statement

YEAR ENDED 30 JUNE 2024





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

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)*, (the "Act").

This Modern Slavery Statement is in respect of the 12-month reporting period from 1 July 2023 to 30 June 2024. The companies and trusts above are all part of the same stapled group, each company has the same Board of Directors and governed by the same policies and procedures. APH Top Co Pty Ltd and QPH Hold Co Pty Ltd are voluntarily reporting as these entities do not meet the required financial threshold.

Criteria Two: Our structure, operations and supply chain

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’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 [2023/24 Sustainability Report](#).

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

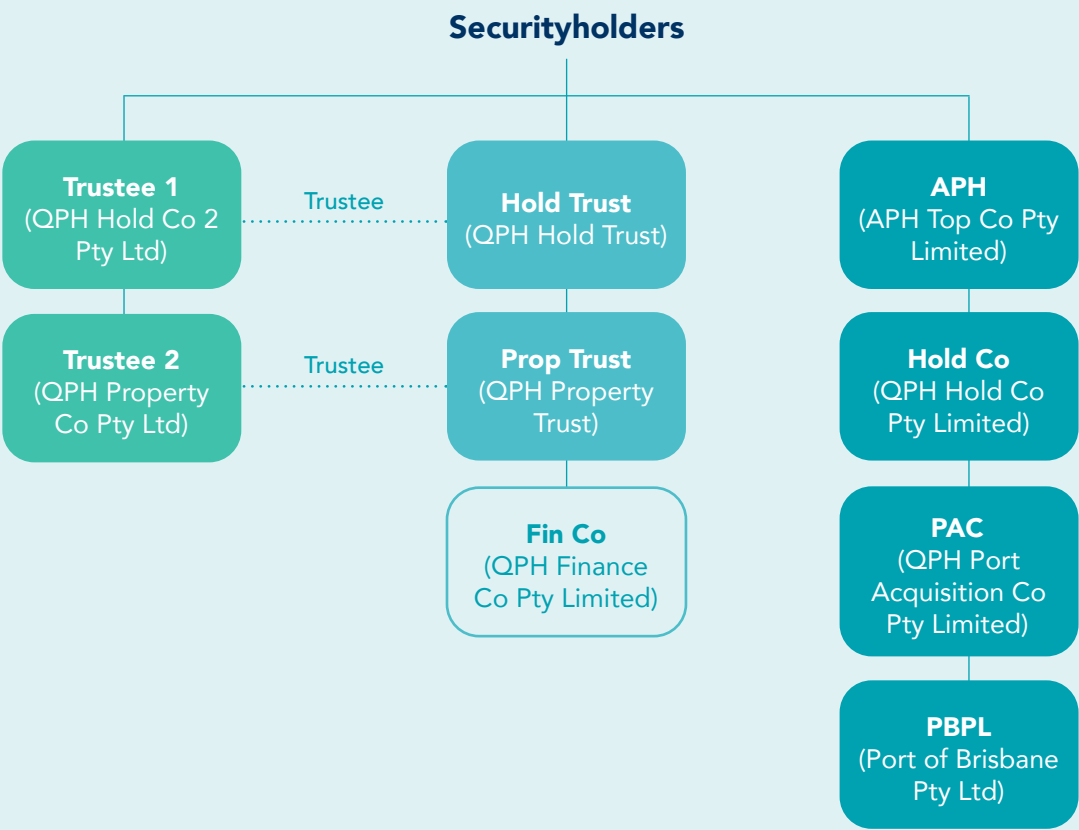
Our 2030 Sustainability Program is framed by four pillars, each underpinned by focus areas to ensure we deliver on our 2030 goals.

Pillars and their 2030 goals	PEOPLE Create an engaged, diverse and responsive culture	PROSPERITY Deliver efficient and sustainable economic growth	PLANET Achieve positive net environmental benefit	PARTNERSHIPS Enable responsible growth
Focus Areas each with a 2030 goal and annual targets to keep our progress on track	- Safety - Health and wellbeing - Culture - Personal development - Robust governance	- Port development - Supply chain enablement - Asset management - Sustainable procurement - Digital transformation	- Air quality - Energy efficiency - Climate change resilience - Resource management - Water quality - Biodiversity	- Customer partnerships - Community partnerships - Research and industry partnerships - Engagement and education



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 financial year 2024, approximately \$72 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:

- QIC Private Capital Pty Ltd (on behalf of its managed funds and clients)
- IFM Investors
- Caisse de dépôt et placement du Québec
- 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 2024, Customised report.

Our services and operations



Port of Brisbane Pty Ltd



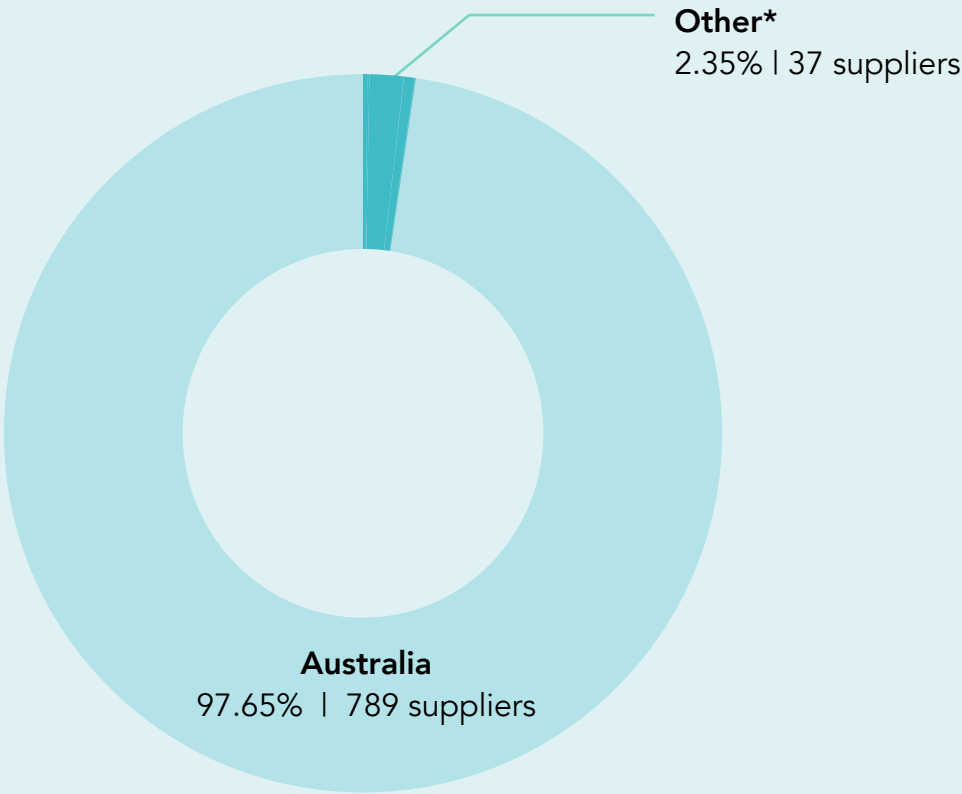
As at 30 June 2024

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, 826 direct suppliers were engaged. Of those suppliers, 95% were located in Australia, with the remaining based in Canada, Germany, France, United Kingdom, Indonesia, Japan, Ireland, Netherlands, Singapore, New Zealand and United States of America. Port of Brisbane’s major categories of procurement include construction, vessel maintenance and refit, facilities, repairs and maintenance, technology, advisory and consultancy services.

Port of Brisbane suppliers and percentage of spend

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



*Other

Singapore 11 suppliers	Ireland 1 supplier
Netherlands 6 suppliers	Japan 1 supplier
United States 6 suppliers	Indonesia 1 supplier
United Kingdom 5 suppliers	France 1 supplier
Canada 2 suppliers	Germany 1 supplier
New Zealand 2 suppliers	



Criteria Three: Identifying the risk of modern slavery practices

Operations

As of 30 June 2024, Port of Brisbane's workforce comprised 232 direct employees (including casuals) and two contractors. 53% of Port of Brisbane's employees are covered by Enterprise Agreements and the remaining 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 Port of Brisbane'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 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.

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 within Port of Brisbane’s supply chain identified as having a higher inherent risk of modern slavery are below.

Construction

- labour
- construction materials
- repairs and maintenance

Commercial Services

- cleaning
- landscaping
- security

Technology

- electronics
- renewable energy

Food and beverage

- raw materials

Textiles

- raw materials
- garments

Consumables

- office consumables
- branded merchandise
- Personal Protective Equipment

While many of our major suppliers are based in Australia, some are global suppliers with extended operations and supply chains across the world. The majority of Port of Brisbane’s goods and services are procured from countries with a low inherent risk of modern slavery, with the exception of Indonesia.

Among the countries from which Port of Brisbane procures from, Indonesia is estimated to have the highest prevalence of modern slavery. While in Indonesia, Port of Brisbane engaged a shipping agent to facilitate a port call for our *TSHD Brisbane* (trailing suction hopper dredge vessel). In this instance, Port of Brisbane assessed the risk of modern slavery as low given the type of services provided, the oversight on operations, and the specific nature of the engagement.

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 recognises the ongoing risk of modern slavery in the maritime industry to seafarers. 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.

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

Modern Slavery Steering Committee

Following a review of the initiatives delivered in 2023 reporting period, Port of Brisbane’s Modern Slavery Steering Committee updated its charter and continued to progress initiatives in the 2024 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.

Internal Governance Structure



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, 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 doing things. During the reporting year, Port of Brisbane undertook an independent ISO Recertification Audit which assessed the continued compliance of our management systems against ISO9001:2015 (Quality), ISO14001:2015 (Environment), and ISO45001:2018 (Health and Safety) standards. No non-conformances were identified, with our Health and Safety, Quality and Environment management systems recertified for three years.

Supplier Risk Assessment Questionnaire

Port of Brisbane has a Supplier Risk Assessment Questionnaire 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 #1

In the reporting period, Port of Brisbane's dredge vessel, *TSHD Brisbane*, underwent a major out of water refit in Singapore; a location and activity recognised as having a significantly higher risk of modern slavery. To support the refit and manage our engagement with the supplier, Port of Brisbane established a framework that required its supplier due diligence questionnaire to be completed,

conducted desktop verification of various aspects of the supplier's management systems including corporate policies, public statements, market announcements, annual reports and records, conducted third party reference checks as to their suitability and work practices, maintained a 24/7 presence at their site and required the supplier to agree to our modern slavery contract clauses.



Case Study #2

Following a review of its supply categories, Port of Brisbane identified the risk of modern slavery in its renewable energy supply chain, particularly concerning solar panels and battery storage. The ongoing emphasis on decarbonisation is rapidly changing and complicating these supply chains. This category is identified as higher risk due to the multi-tiered nature of supply, as well as the geographic location of manufacturing and the labour practices in those countries. As such, Port of Brisbane undertook a targeted assessment of suppliers engaged for the supply and installation of renewable technologies.

Five Australian-based direct suppliers, two of which were head contractors, completed Port of Brisbane's Supplier Risk Assessment Questionnaire.

The assessments demonstrated that the suppliers understand and actively mitigate modern slavery risk through sound working conditions, grievance mechanisms, training, and company policies related to modern slavery, anti-bribery, corruption, and fraud. Notably, two suppliers publish their own Modern Slavery Statement also. Although all five suppliers indicate they have medium to high visibility of their direct supply base, Port of Brisbane acknowledge these insights primarily reflect surface-level awareness of the multiple layers within the supply chain. Despite this, Port of Brisbane emphasise the importance of engaging key suppliers in relation to modern slavery to foster awareness and transparency.



Policies and Training

In July 2023, Port of Brisbane's Anti-Bribery and Corruption Policy was updated alongside the introduction of new online training modules for Anti-Bribery and Corruption, and Fraud and Whistleblower Awareness. This training complements Port of Brisbane's annual modern slavery training, as well as further enhances and reinforces obligations and guidelines included in the Code of Conduct and Whistleblower Policy. Port of Brisbane seeks to reduce the risk of modern slavery by strengthening controls intended to help protect vulnerable populations, ensure accountability, and create a safe reporting culture.

Employee Handbook

In this reporting period, Port of Brisbane updated its employee handbook for the crew onboard the *TSHD Brisbane*. The employee handbook outlines Port of Brisbane's policies, culture, and expectations of behaviour and performance in the workplace. Information on modern slavery was incorporated into the handbook during this review in consultation with the crew. This will ensure new and existing crew are informed about the associated risks.

Standardised External Modern Slavery Client Tender Content

To enhance client confidence and drive compliance, Port of Brisbane developed a standardised modern slavery template for client tenders. Port of Brisbane seeks to demonstrate its commitment to ethical practices and social responsibility with its clients, whilst promoting transparent and responsible supply chains.

Supplier Onboarding

During the reporting period, Port of Brisbane's supplier onboarding form was updated to assess new suppliers' awareness of and compliance with modern slavery legislation. The responses will provide valuable data insights and serve as a reference point in the future.

ISO20400 Sustainable Procurement

During the reporting period, Port of Brisbane engaged an independent expert to undertake a gap analysis of PBPL's current business and procurement processes, and the requirements contained in the ISO20400 (Sustainable Procurement) standard. The outcomes of the gap analysis informed the development of Port of Brisbane's Sustainable Procurement Strategy which will commence implementation in the 2025 financial year and provide a pathway towards Port of Brisbane achieving its 2030 Sustainable Procurement focus area goal. This strategy will seek to enhance Port of Brisbane's response to modern slavery.

ERP Transformation Project

Port of Brisbane continued to progress its Enterprise Resource Planning (ERP) project, a multi-year business-wide project focusing on optimising and redesigning specific financial and procurement processes to align with industry best practice. This work continues to create a platform to support its sustainable procurement goals into the future, as well as enabling reporting enhancements on its current supplier base. Substantial work was completed on the project during financial year 2024, and the new ERP system successfully went live in July 2024. Further enhancements are planned for 2025 financial year.

Communication

During the reporting period, 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 Modern Slavery Statement 2023 was shared with its employees in January 2024, as well as the port community via the February 2024 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.

Additionally, Port of Brisbane recognises the importance of Mission to Seafarers in improving seafarer welfare within the shipping industry and has continued to foster and develop this relationship. During the reporting period, a Port of Brisbane representative joined the Mission to Seafarers (Brisbane) Management Committee, whilst continuing its participation in its Port Welfare Committee. Port of Brisbane also collects and donates clothing for visiting via Mission to Seafarers (Brisbane).

Criteria Five: Effectiveness of actions

After every reporting period, Port of Brisbane reflects on the progress made. Assessing the effectiveness of Port of Brisbane's actions will, over time, contribute to the improvement of social practices within the business as well as globally.

In the reporting period, the following key initiatives were progressed:

- Review of the Modern Slavery Steering Committee Charter and continued progress on initiatives.
- Anti-slavery clauses continued to be incorporated in new and precedent contracts.
- Supplier assessments of targeted high-risk categories of supply.
- Updated Port of Brisbane's Anti-Bribery and Corruption Policy in July 2023.
- Released updated Anti-Bribery and Corruption and Fraud and Whistleblower Awareness training module with a completion rate of 92% and 93% respectively.
- Reviewed and refreshed the employee handbook for *TSHD Brisbane* crew to outline modern slavery risks.
- Developed standardised modern slavery client tender template to share anti-slavery commitments with its prospective customer base.
- Developed a Sustainable Procurement Strategy to achieve alignment to ISO20400 by 2030.
- Continued progress on Port of Brisbane's ERP Transformation Project to establish a platform to better support the core business strategy and commitments.
- Updated Port of Brisbane's supplier onboarding form to assess modern slavery compliance.
- Shared Port of Brisbane's Modern Slavery Statement 2023 and associated initiatives with all employees and the port community to raise awareness.
- The number of new and existing employees who have completed Port of Brisbane's online, annual modern slavery training increased 6% to 93% as at 30 June 2024.
- Activated new channels of communication with industry peers and continued collaboration with securityholders to share learnings.
- Strengthened existing relationship with Mission to Seafarers (Brisbane), by joining its Management Committee and collecting and donating clothing for visiting seafarers.

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

22 November 2024

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/>



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