

Port of Melbourne

2023 Modern Slavery Statement



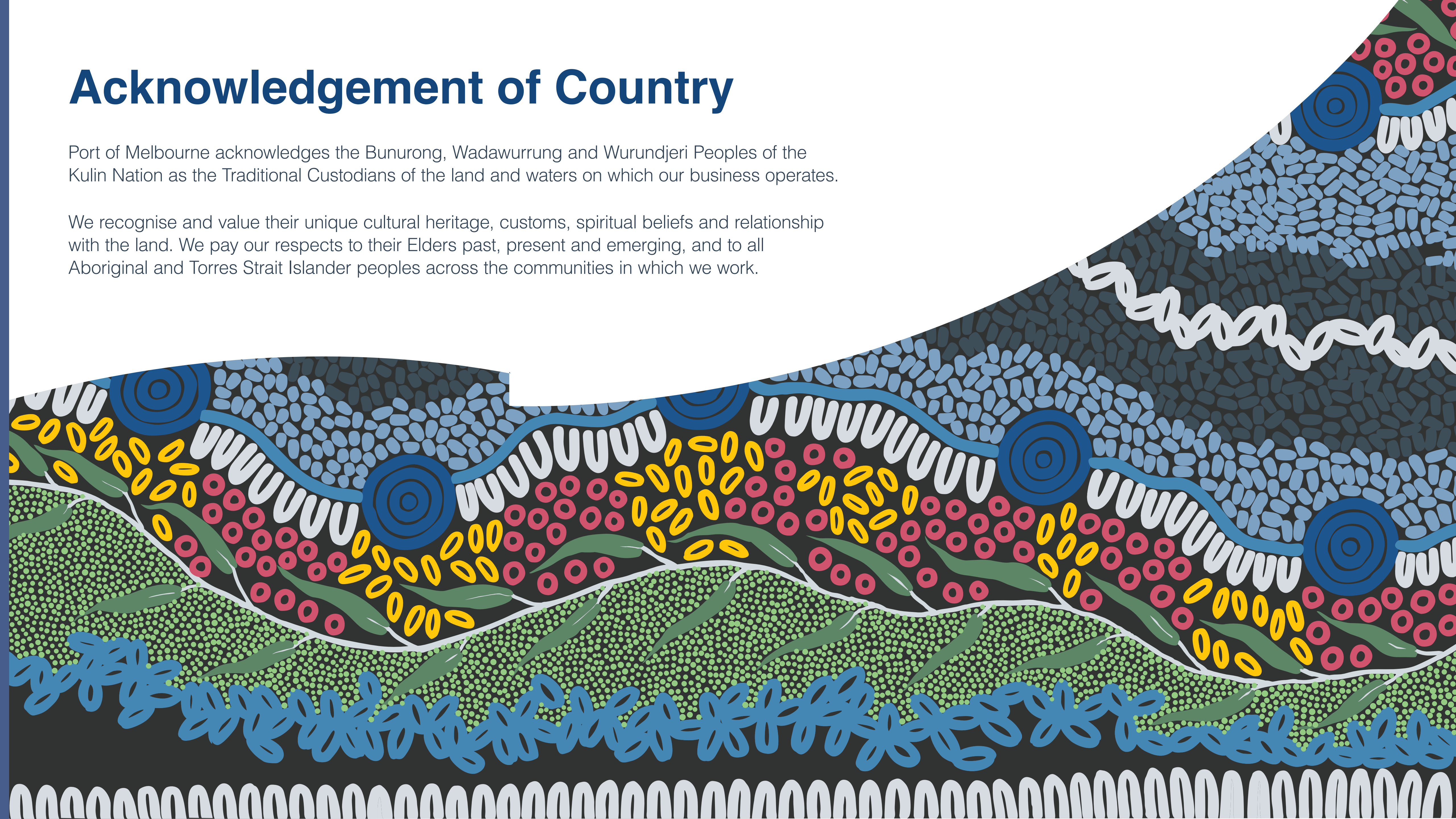
Port of Melbourne



Acknowledgement of Country

Port of Melbourne acknowledges the Bunurong, Wadawurrung and Wurundjeri Peoples of the Kulin Nation as the Traditional Custodians of the land and waters on which our business operates.

We recognise and value their unique cultural heritage, customs, spiritual beliefs and relationship with the land. We pay our respects to their Elders past, present and emerging, and to all Aboriginal and Torres Strait Islander peoples across the communities in which we work.



About this statement

This Modern Slavery Statement is made on behalf of the entities detailed below which are a part of the Port of Melbourne Group (referred to as 'PoM, 'we', 'our' or 'us'), and has been prepared in accordance with, and for the purposes of the *Modern Slavery Act 2018* (Cth) (the Act).

It describes the risks of modern slavery in our operations and supply chain during the year ended 30 June 2023 (the Reporting Period) and details the steps that we have continued to take in responding to the risks of modern slavery occurring in our operations and supply chain, along with an assessment of the effectiveness of these steps.

The following entities within PoM are reporting entities under the Act as they carry on business in Australia and had a consolidated revenue of over \$A100 million during the Reporting Period:

- Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust;
- Lonsdale Operations Hold Pty Limited as trustee for the Lonsdale Operations Hold Trust;
- Lonsdale Asset Hold Pty Limited as trustee for the Lonsdale Asset Hold Trust;
- Lonsdale Asset Property Pty Limited as trustee for the Lonsdale Asset Property Trust; and
- Lonsdale Finance Pty Limited.

For completeness, Lonsdale Finance Hold Pty Limited, also an entity within PoM, is included in this Statement which applies to all PoM entities.

Consultation and approval

Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust is the operating entity of PoM and provides services to the entities within PoM under management agreements. In its role as service provider to the entities within PoM, it is informed on all activities undertaken by PoM and employs all staff within PoM. In this Statement, a reference to the Board is to the board of Port of Melbourne Operations Pty Ltd as trustee for the Port of Melbourne Unit Trust.

This Statement has been prepared in consultation with, and has been approved by, the Board on behalf of each of the Reporting Entities comprising PoM on 22 November 2023 and is correct as of that date.

Disclaimer

This Statement has been prepared by Port of Melbourne Operations Pty Ltd as trustee of the Port of Melbourne Unit Trust on behalf of PoM for the purposes of the *Modern Slavery Act 2018* (Cth) in relation to the Reporting Period (Purpose). This is a proprietary PoM document. While PoM has made reasonable efforts to ensure that information and materials provided in this Statement are free from error, PoM provides no warranty as to the accuracy, adequacy or completeness of any information provided. The information is based on information and sources which PoM believes to be reliable. Such information is intended as general information only and is intended to be current at the date of this Statement's publication. PoM recommends that any party seek further advice or make further enquiries which takes into account the relevant party's particular circumstances before considering or acting on this material further. PoM will not be liable to any third party using or relying on any information contained in this Statement for any purpose other than the Purpose.



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Chairperson's message

Port of Melbourne has been a trade gateway for south-eastern Australia for more than 130 years. We are proud of our role as custodian of the port, which is a vital economic asset and a critical part of Victoria's infrastructure. Our ongoing success is essential to the continued growth and prosperity of Victoria and Australia.

Through our commitment to sustainability, we work with stakeholders across the supply chain with the goal to build a sustainable port for the benefit of the Victorian economy and liveability of Melbourne. Core to this is our commitment to operate our business responsibly and ethically, and we expect that our stakeholders and suppliers will operate in the same way.

In FY23 we formalised our commitment to upholding human rights by developing a Human Rights Policy outlining our principles for respecting and protecting human rights, and providing access to appropriate action for remedy for adverse human rights impacts.

We continued to provide employee training on modern slavery risks with 100 per cent of our new starters completing a modern slavery awareness course.

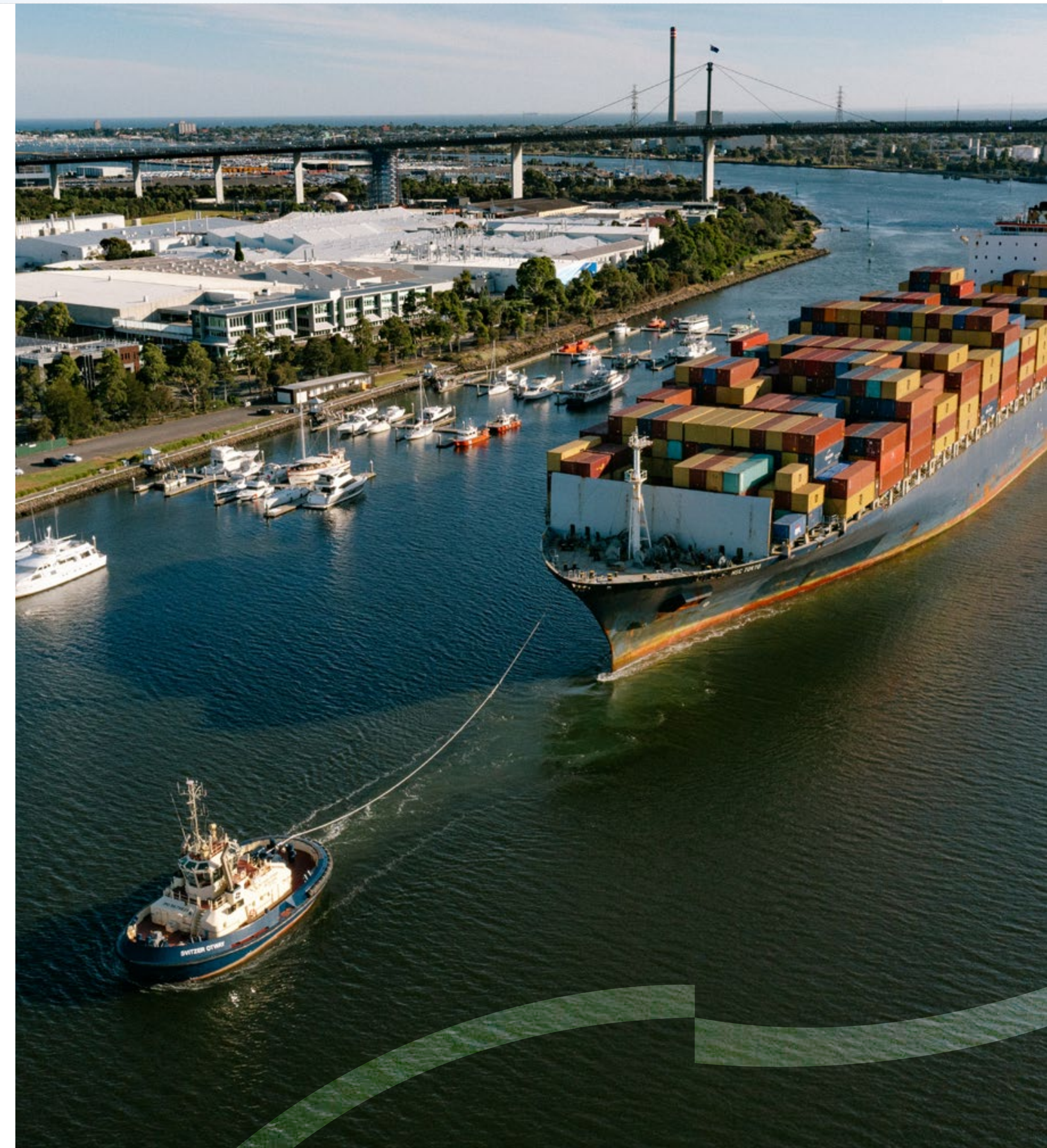
During the year we also strengthened our assessment of potential modern slavery risks with our direct suppliers and through our extended supply chain. We incorporated modern slavery assessment criteria and contractual clauses, in line with our procurement processes, when engaging suppliers in higher risk categories.

We deepened our focus on the welfare of seafarers visiting the Port of Melbourne, engaging with a range of stakeholders who support or promote seafarer welfare. We continued to provide financial support to our long-term community partners, Stella Maris and Mission to Seafarers, whose mission is to support seafarer welfare.

Going forward, we are committed to continuing to strengthen our practices and engage with our suppliers to address risks of modern slavery risks in our operations and supply chains.

John Stanhope

Chairperson of the Board of Directors



About Port of Melbourne

As Australia's largest general cargo and container port, the Port of Melbourne is a vital trading gateway for south-eastern Australia, facilitating more than one-third of the nation's container trade and enabling economic activity in the region. The port services the southeast of Australia, including Tasmania, and occupies a central position in the freight and logistics industry.

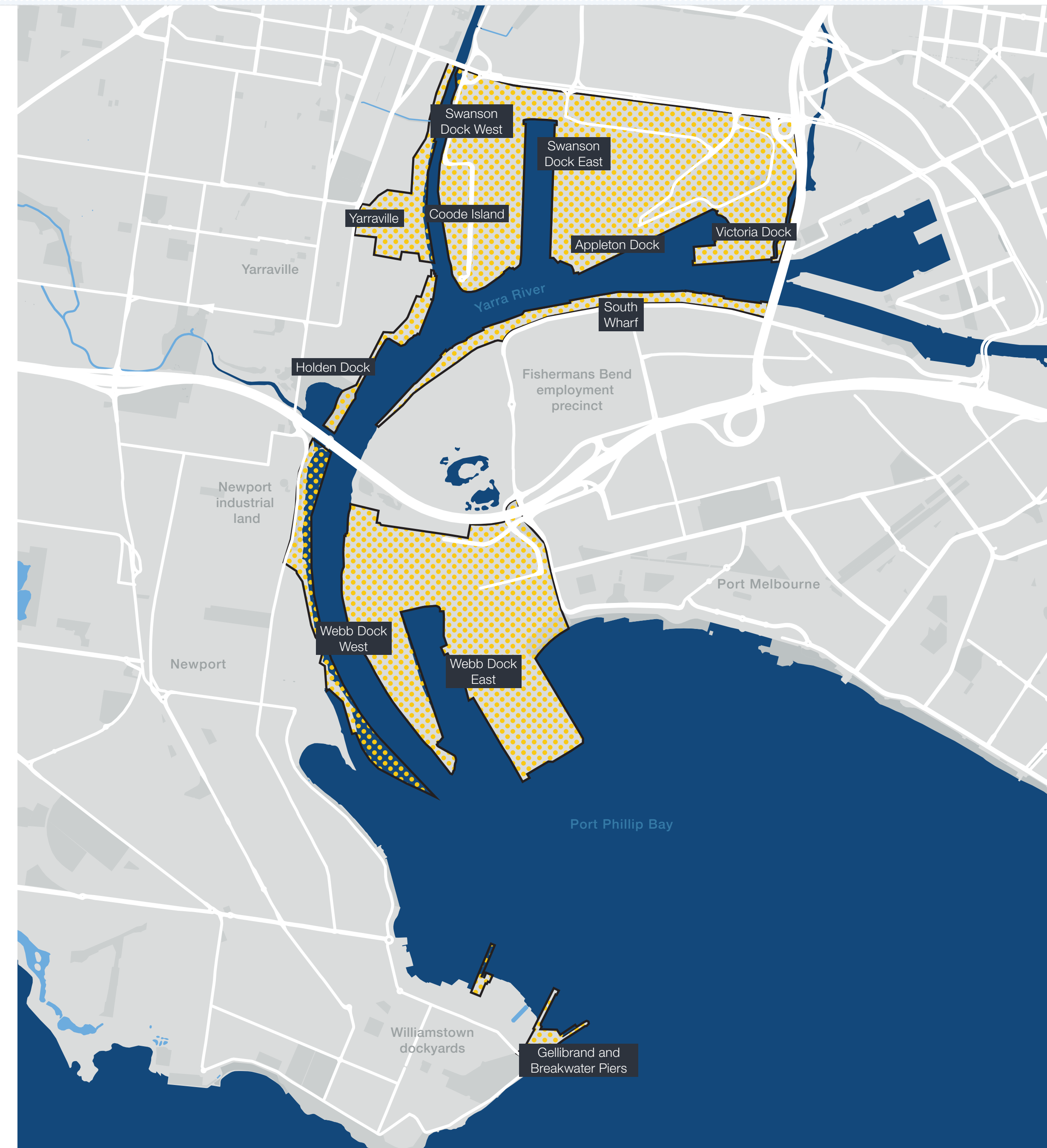
Our operations

PoM manages 505 hectares of port land stretching from Williamstown in the west around Port Phillip Bay to Port Melbourne in the east. We also manage 52 kilometres of commercial shipping channels within Port Phillip Bay and the Yarra River.

Under a long-term lease arrangement from the Victorian Government, PoM is responsible for maintaining and developing these lands, waters, port facilities and the associated infrastructure which includes 30 commercial berths and wharves, terminal and trade-handling facilities and connections to surrounding road and rail networks. Our responsibilities also include planning for the long-term use of port land and shipping channels to ensure we have the capacity and capability to handle cargo well into the future.

The berths, wharves, terminals, and trade handling facilities are used by our 71 tenants and other private businesses who largely undertake the port's daily operations including the provision of cargo shipping, stevedoring, pilotage, towage and road and rail transport services.

Our regulatory framework, overseen by the Essential Services Commission, enables PoM to charge tariffs for prescribed services including wharfage fees, berth hire fees and channel fees. We also charge tenants to lease space and facilities in the Port of Melbourne precinct.



FY23 operational statistics



2,810

ship arrivals



24

hours a day,
7 days a week operations



3,188,453

TEUs¹



108.9

million revenue tonnes



505

hectares of land



31

hectares of open space



71

tenants



30

commercial berths



18

hectares of public land



52

kilometres of shipping channels



27

kilometres of waterfront



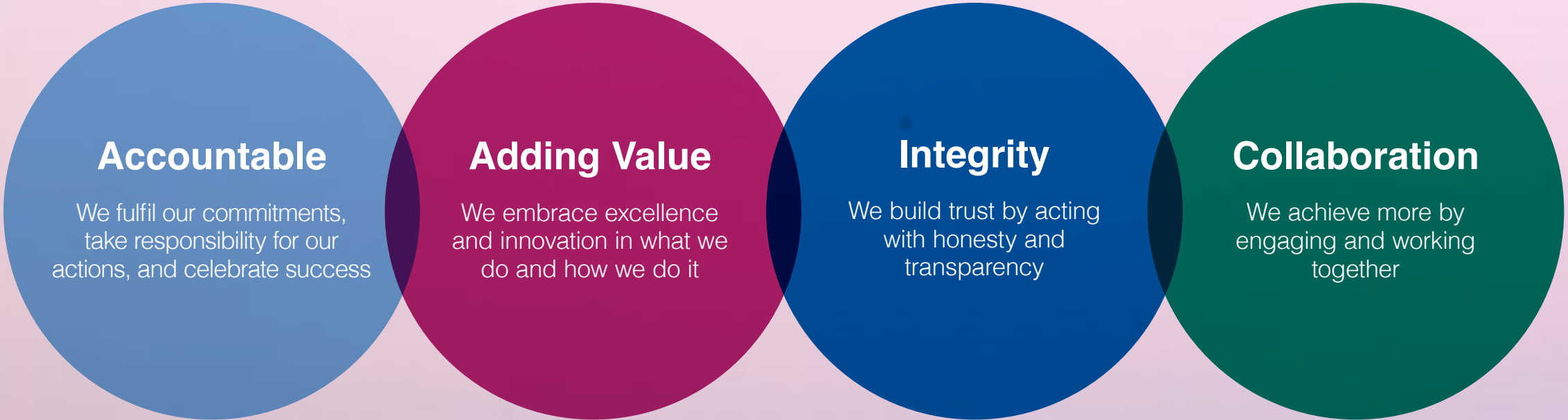
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municipal boundaries

¹ TEU: Twenty-foot equivalent unit, the most common container sizes are 20 and 40 feet long.

Our values

Our values are fundamental to everything we do, both within our own operations and through our engagement with our stakeholders. Our values guide how we go about our business, the decisions that we make and the actions that we take every day.



Our vision

Our passion for growing trade creates an enduring city port, driving the economy and enriching lives.

Our mission

Working with stakeholders, delivering innovative and sustainable port solutions – creating the future and building on our proud history.



Our governance and policies

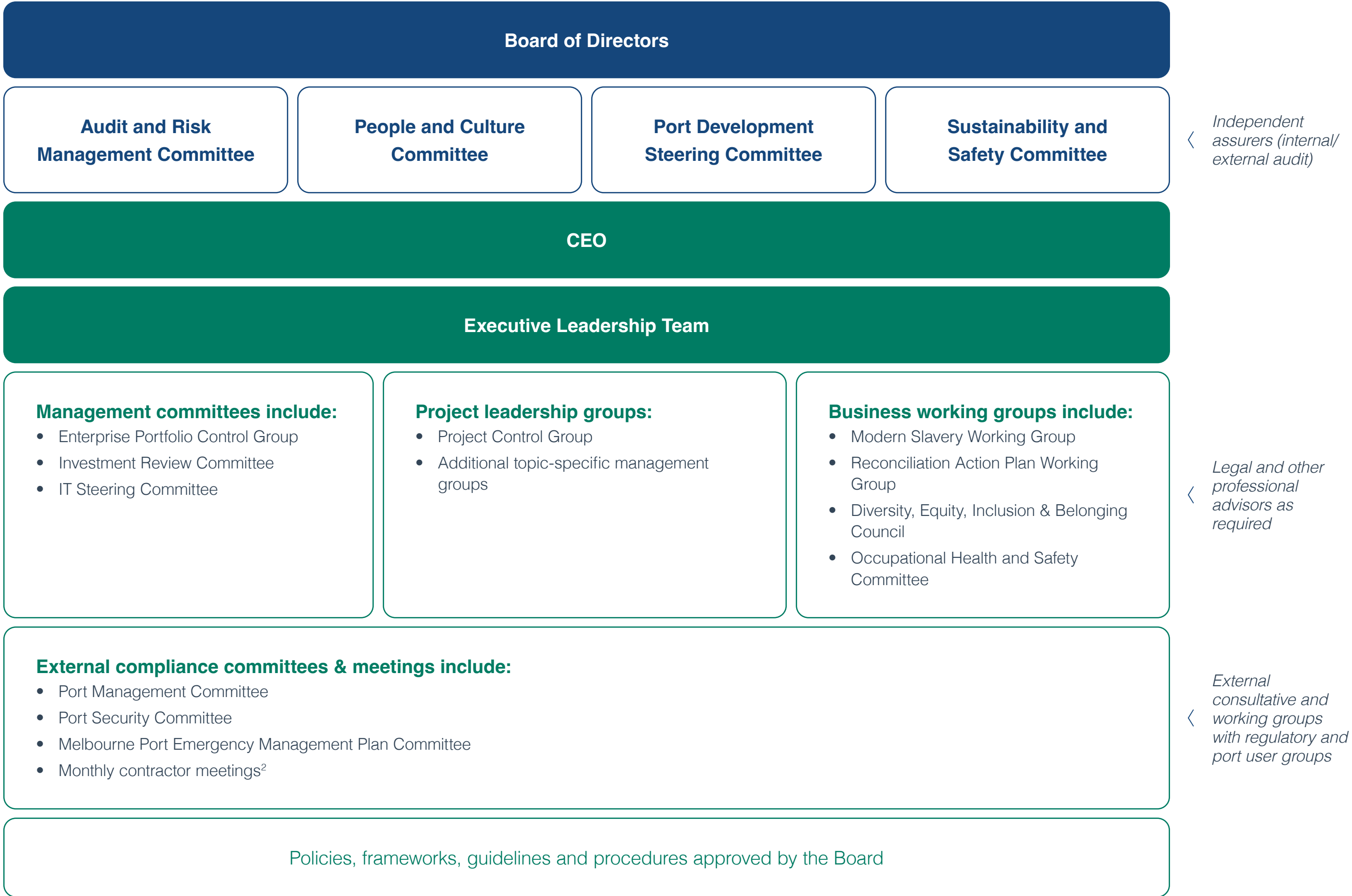
PoM is committed to maintaining strong corporate governance practices which help us meet the requirements of applicable legislation and corporate governance standards.

Corporate governance framework

The Safety and Sustainability Committee supports the PoM Board's oversight of the Sustainability Strategy and its delivery, which includes PoM's management of modern slavery and human rights risks.

PoM's cross-functional Modern Slavery Working Group includes executive level leadership and representatives from our Legal Services, People and Culture, Sustainability, Operations and Corporate Relations functions. The Working Group supports the delivery of PoM's modern slavery risk management, including preparing our annual modern slavery statement.

PoM's corporate governance framework



² The reference to PoM's contractors in this framework relates to third-party suppliers that perform infrastructure operations and maintenance services in the Port of Melbourne precinct.

Policies and frameworks

Our governance is supported by policies that are reviewed biennially and approved by our Board, including the following policies that support our management of modern slavery risks.

Code of Conduct

Our Code of Conduct governs the conduct of our employees and contractors by establishing a clear expected standard of behaviour and fosters a positive work environment where everyone's rights are maintained.

The Code of Conduct is supported by a suite of policies, frameworks and guidelines, including the Appropriate Workplace Behaviour Guideline, that reflect PoM's commitment to governance, anti-corruption, ethical conduct, equal opportunity, workplace health and safety, and privacy. It also outlines the formal support structure in place to assist employees with any concerns or grievances they may have, including our Whistleblower Policy.

Human Rights Policy

Our Human Rights Policy was developed in 2023 and is guided by the *United Nations Guiding Principles on Business and Human Rights*. It outlines our principles for respecting and protecting human rights in our operations and supply chain, and providing access to remedy for adverse human rights impacts. It describes how we will apply the policy through our broader policy framework and sets out the procedures for reporting actual or suspected breaches of the policy.

Whistleblower Policy

Our Whistleblower Policy provides a framework for PoM to respond to any reports of actual or suspected misconduct, including instances of modern slavery.

It outlines the legal protections available for whistleblowers from detrimental conduct and sets out our procedures for receiving, handling and investigating such reports, including PoM's independent external service that enables eligible persons to make anonymous reports. The policy applies to all eligible persons including, but not limited to, directors, employees, contractors, suppliers and their family members.

Sustainability Policy

Our Sustainability Policy sets the standards for how PoM will achieve our sustainability objectives, outlining the principles that guide the way PoM plans, operates and makes business decisions. These include principles to maintain a safe, diverse, equitable and inclusive workplace, respect and support the communities in which we operate and manage sustainability risks. The policy references relevant regulatory and intergovernmental instruments, including the Act and the United Nations Sustainable Development Goals.

Diversity, Equity, Inclusion and Belonging Policy

Our Diversity, Equity, Inclusion and Belonging Policy sets out our commitment to workplace diversity and inclusion. It states what diversity and inclusion means to us and identifies the types of behaviours we expect of our employees to encourage a diverse and inclusive workplace.

Occupational Health, Safety and Wellbeing Policy

Our Occupational Health, Safety and Wellbeing Policy outlines our commitment to a safe and healthy environment for all employees, contractors and visitors. It provides an overview of our health and safety policy objectives to maintain our health and safety management system, compliance with the relevant legislation, measurement and targets related to work-related injury and illness, workforce engagement on health and safety, and stakeholder relationship building to improve outcomes.

Procurement and Contract Management Policy

Our Procurement and Contract Management Policy outlines the principles that guide our procurement activities. The policy reflects the value, risk, and complexity of each of our engagements and balances achieving commercial value with probity, efficiency and sustainable outcomes. The policy sets out our commitment to ensuring PoM conducts appropriate due diligence and engages suppliers aligned to our sustainability, health and safety, cybersecurity and modern slavery principles.

Risk Management Framework

Our Enterprise Risk Management Framework defines and identifies our risk appetite, risk management process, responsibilities across all levels of the organisation from our Board to employees, reporting requirements and our strategic approach to risk.

Reconciliation Action Plan

Our *Reflect* Reconciliation Action Plan sets out our commitment to promote Aboriginal and Torres Strait Islander rights and reconciliation through building relationships, building respect, and creating opportunities between PoM and our communities.

Our workforce

PoM’s employees are skilled professionals who oversee and implement strategy, operations and engineering, property and finance, human resources, legal, and corporate relations activities.

All our employees are engaged in Australia under local employment laws. Recruitment is managed by our internal People and Culture team, supported by external recruiters for select roles. All recruitment and onboarding is overseen by PoM’s People and Culture team in compliance with our Code of Conduct.

At 30 June 2023, PoM employed 144 people. All our employees are based in our corporate office, located adjacent to the port in Melbourne’s Docklands, with the exception of one employee based in Wagga Wagga in the Riverina region of New South Wales.

FY23 WORKFORCE PROFILE (at June 30)

Total employees	144
Permanent contract	143
Fixed-term contract	0
Casual	1
Contingent workers*	15
Percentage of employees covered by collective bargaining agreements	9%

* PoM defines contingent workers as temporary workers with a limited tenure that are engaged to do work controlled by PoM and are employed as independent contractors, freelancers or employees of PoM’s suppliers. PoM’s contingent workers are provided with a workspace and/or tools and complete mandatory compliance training modules including Appropriate Workplace Behaviour training. All contingent workers are employed in Australia.



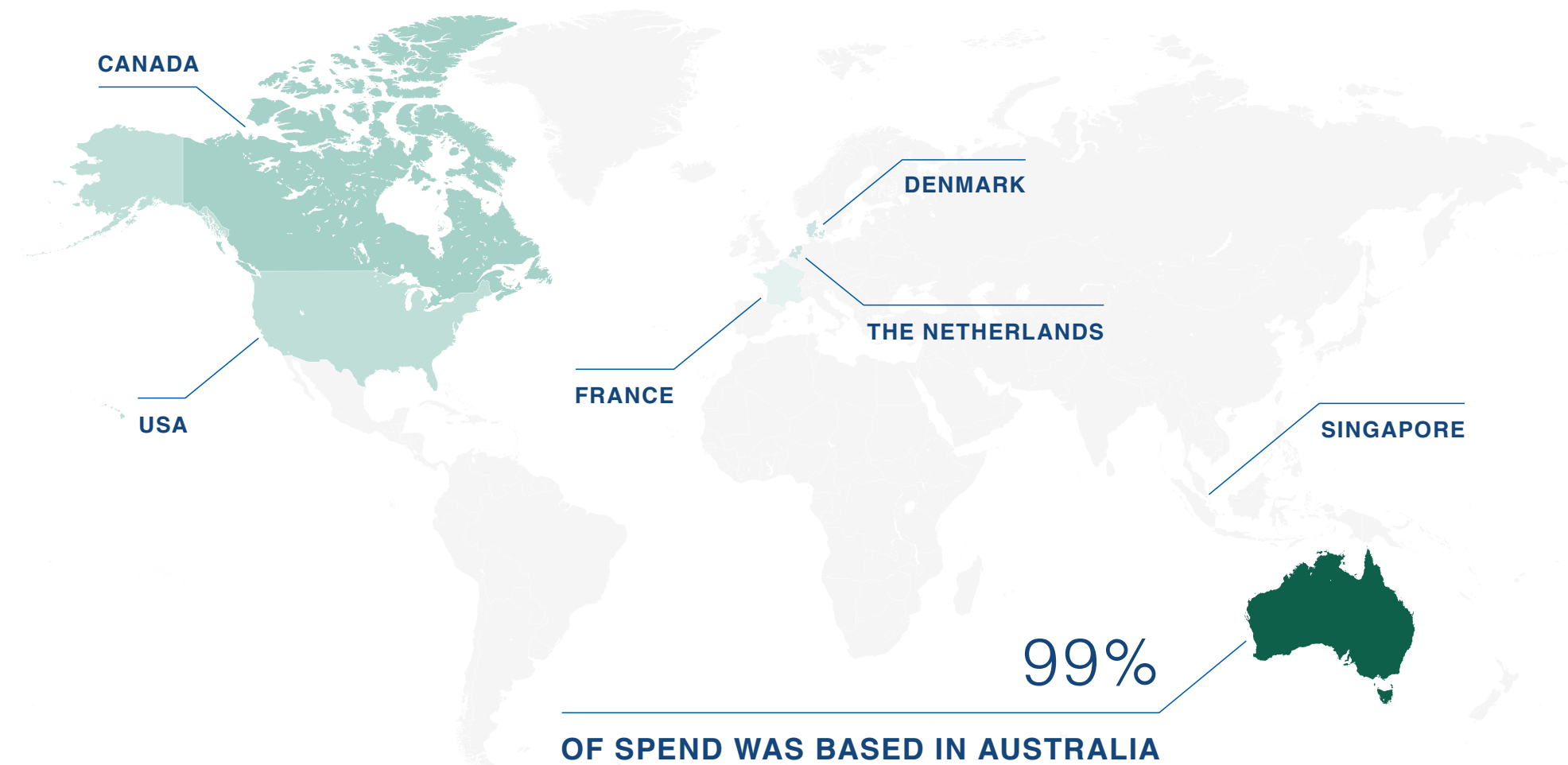
Our supply chain

PoM is guided by our Procurement and Contract Management Policy and Guidelines through all stages of the purchasing lifecycle from identification of need, through supplier identification, purchase and delivery to the contract end and review of the engagement.

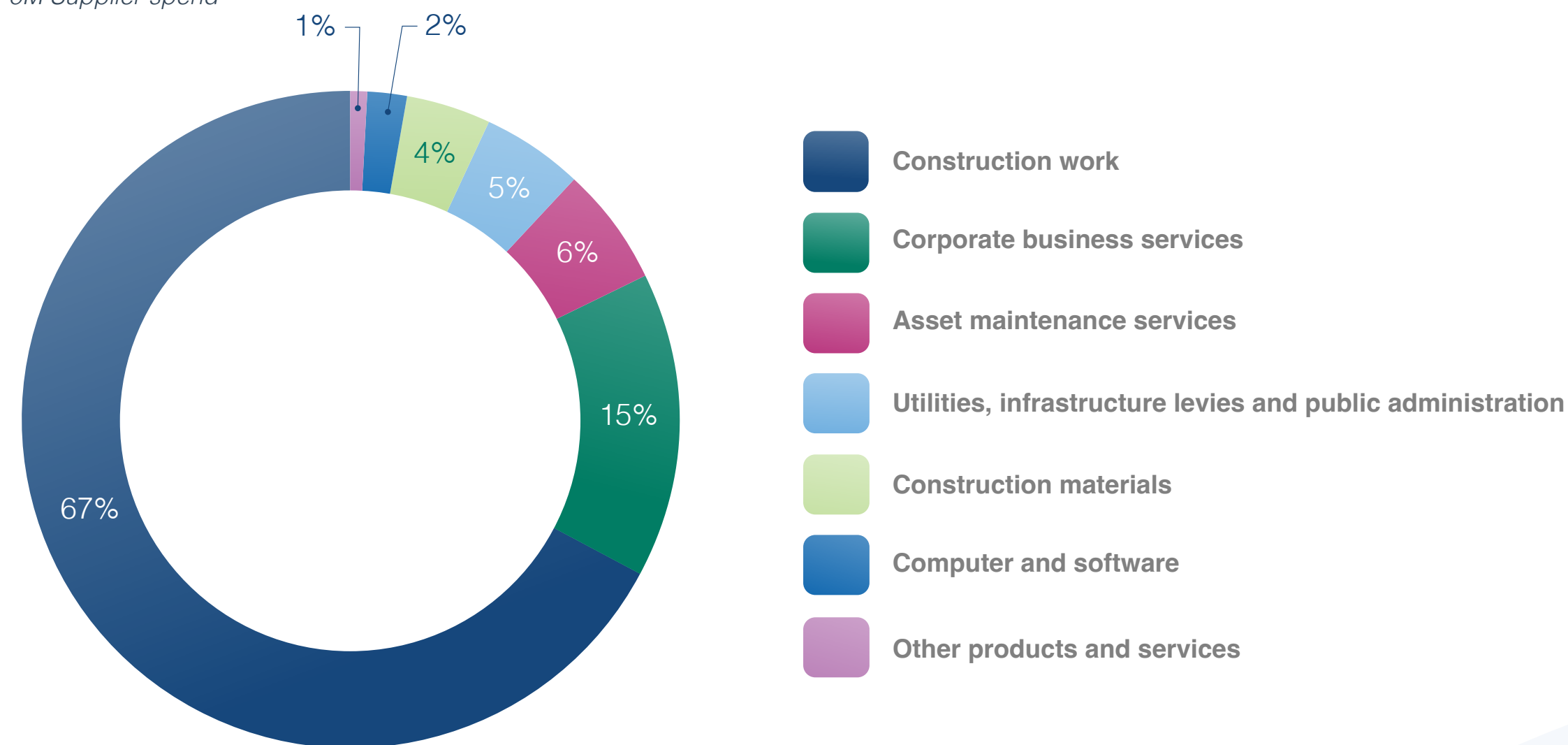
PoM's procurement and contract management practices include due diligence checks for consistency with our values, supplier compliance with regulation, and alignment with our sustainability principles and requirements, including modern slavery. Our intention is to partner with organisations who are aligned with our sustainability priorities to reduce any potential instances of modern slavery in our supply chain.

In FY23, PoM spent \$258 million for goods and services from more than 400 suppliers across a number of categories. Over 99 per cent of our spend and over 97 per cent of our suppliers were based in Australia. The remaining suppliers were based in North America, Europe, Singapore and Hong Kong.

Geographic spread of supplier spend



PoM Supplier spend



The most significant spend categories in FY23 were:

- Construction work:** this includes suppliers who develop and construct PoM's infrastructure assets such as wharves, roads, rail, and civil works as part of our capital construction projects. In FY23 this included the Port Rail Transformation project, which comprised the majority of our overall spend, and the Swanson Dock West remediation project.
- Corporate business services:** a range of businesses provide PoM with services including consultancy, IT, accounting, tax, audit, market research, cleaning and waste services.
- Asset maintenance:** this includes suppliers that perform infrastructure operations and maintenance services including specialists in marine, electrical, real estate, civil infrastructure and port security.
- Utilities, infrastructure and public administration:** we work with public authorities and other infrastructure managers to deliver port operations including services provided by rail, electricity and water utilities.
- Construction materials:** this includes the procurement of materials and parts for our infrastructure assets.
- Computer and IT software:** PoM uses a range of technical and general corporate IT and computer software.
- Other products and services:** this category captures a range of other goods and services, most notably from a modern slavery perspective it includes spend on Personal Protective Equipment (PPE), safety equipment and branded corporate goods.

Modern slavery risks

PoM acknowledges that there is a risk that modern slavery may be present in our operations and supply chain.

Operational risks

There is an inherent risk that PoM could play a role in modern slavery through our workforce practices. Given the nature of the employment arrangements for our workforce under the *Fair Work Act 2009* (Cth), our governance and policy framework and employee training, we have assessed that the residual risk of exploitation of our employees is low.

Supply chain risks

Understanding the risks of modern slavery in our supply chain remains a priority for PoM. The potential risks are most significant in the following categories of goods and services we procure.

By spend

- Construction services for infrastructure development.
- Construction materials.

By category

- Personal Protective Equipment (PPE) and other branded corporate goods.
- Facilities management services, including security, cleaning, and waste services.

In FY23 we strengthened our internal assessment of modern slavery risks across our extended supply chain. Working with FairSupply, we used a risk profiling model to gain insights into potential modern slavery risks from tier one to tier ten of our supply chain, providing a more comprehensive analysis of our risk exposure.

FairSupply's model uses proprietary technology to link global trade flow data with PoM's supplier spend data, using multi-regional input-output data that captures the geographic location and industry of products and services in the extended supply chain. Starting with our direct suppliers (tier one), the model maps the trail of spend to our direct suppliers' typical suppliers (tier two) all the way to tier ten, assessing the cumulative potential modern slavery risk exposure along our supply chain.

This analysis has enabled PoM to identify the categories, geographic regions and tiers within our supply chain where the potential risk of modern slavery exposure is highest so that we can be more targeted in our supplier engagement and assessment going forward.

Potential modern slavery risk exposure in our direct supply chain

FairSupply's model assigns a high to low rating of potential modern slavery risks for each of PoM's direct, or tier one, suppliers. The model did not rate any of PoM's direct suppliers as having high potential for modern slavery risk. PoM's suppliers of PPE and branded corporate goods were rated as having moderate potential for modern slavery risk. This procurement represented 0.02 per cent of PoM's overall supplier spend in FY23.

Under four per cent of PoM's FY23 spend was with direct suppliers rated by FairSupply as having moderate-low potential for modern slavery risk, and over 96 per cent of spend was with direct suppliers rated as having low potential risk. This includes suppliers of construction services and materials which represent a high proportion of PoM's overall spend. These categories remain a priority area of focus for our management of modern slavery risks.

RISK PROFILE	PROPORTION OF SUPPLIERS	PROPORTION OF SPEND	RELEVANT PRODUCTS OR SERVICES
Low	90%	96.35%	Construction services Corporate business services Port-related public administration services
Moderate-low	8%	3.63%	Construction materials
Moderate	2%	0.02%	PPE and safety equipment Corporate branded goods Office catering Stationery and office furniture
High	0%	0%	NA

Potential modern slavery risk exposure in our extended supply chain

FairSupply’s modelling enabled us to better understand the complexity and distribution of potential modern slavery risks across our extended supply chain from tier one to tier ten.

The modelling identified that, across ten tiers of our supply chain, over 54 per cent of potential modern slavery risk exposure is in Australia. The remaining potential risk exposure includes ten per cent in India and eight per cent in China, driven primarily by indirect procurement from the textiles industries.

A third of the potential risk exposure across ten tiers of our supply chain total risk is attributed to construction services, most of which is located in Australia.



Seafarers and port operations

The day-to-day operation of the Port of Melbourne is largely undertaken by private businesses, including the provision of cargo shipping, stevedoring, pilotage, towage and road and rail transport services. These operations are not under PoM's control and therefore outside our obligations for reporting under the Act. However, they are part of PoM's value chain, and we acknowledge there are inherent risks related to the shipping and logistics industry.

In FY23 over 2,800 ships visited the Port of Melbourne. We acknowledge that the seafarers crewing these vessels are vulnerable to modern slavery risks. The risk level ranges from low to moderate as working conditions vary and are difficult to assess due to fragmented regulatory oversight and complex supplier arrangements.

The global logistics sector, which moves cargo in and out of ports, may also contain inherent modern slavery risks. In Australia this is a low-risk industry, but vulnerabilities may exist including those driven by subcontracting and connections with global supply chains.



Priority risk areas

The FairSupply risk profiling assessment undertaken in FY23 has strengthened our understanding of those areas of highest modern slavery risk exposure.

POTENTIAL RISK	IMPACTED GROUPS	MITIGATING ACTIONS
 Construction labour	<p>PoM engages construction companies to undertake infrastructure development and upgrade works in the port.</p> <p>Construction companies often work with complex supply chains that may include labour hire arrangements. Potential labour exploitation issues in Australia include substandard working conditions (including poor health and safety practices), unfair hours and unfair pay. Less commonly, cases of human trafficking, debt bondage, withholding passports and threatened violence have been recorded in the industry³.</p>	<ul style="list-style-type: none"> PoM's Procurement and Contract Management Policy and Guidelines Inclusion of modern slavery clauses in supplier contracts PoM's integrated safety management system Safety Subordinate Risk Register for Contractors Contractor Safety and Environment Management Procedure Regular construction site audits
 Construction materials	<p>PoM procures construction materials including cement, steel and fabricated metal products to undertake infrastructure development and upgrade works in the port.</p> <p>Materials and large equipment are often sourced from international manufacturers in high-risk industries and/or geographies with limited working condition controls.</p>	<ul style="list-style-type: none"> PoM's Procurement and Contract Management Policy and Guidelines
 Facilities management services	<p>Port of Melbourne procures facilities management services from suppliers including security, cleaning, and waste services.</p> <p>These services are at higher risk of modern slavery due to a high level of subcontracting, reducing oversight of employee working conditions. These industries also employ a greater representation of people from vulnerable populations such as base-skilled workers, workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds.</p>	<ul style="list-style-type: none"> PoM's Procurement and Contract Management Policy and Guidelines Inclusion of modern slavery clauses in supplier contracts Tender processes include questions relating to the management of modern slavery risk and sub-contracting policies
 PPE and other branded corporate goods	<p>PoM procures PPE and other corporate goods such as office furniture and branded merchandise.</p> <p>These products may be mass produced at low cost, procured from countries in high-risk geographies, or made by workers from vulnerable backgrounds.</p>	<ul style="list-style-type: none"> PoM's Procurement and Contract Management Policy and Guidelines Engagement with direct suppliers about their approach to managing modern slavery risks
 Seafarer welfare This risk is outside PoM's operational and supplier obligations	<p>Seafarers are vulnerable to modern slavery risks due to the complex employment arrangements that can include separate crew agents, ship operating companies and vessel managers. In addition, regulation and oversight of seafarer welfare is fragmented due to the global nature of this industry. Exploitation issues can include bullying and harassment, refusal of shore leave, untreated injuries, no access to fresh food, withholding of wages, withholding of identification documents and overtime⁴.</p>	<ul style="list-style-type: none"> Ongoing partnership and financial support to seafarer organisations who support the welfare of seafarers visiting the Port of Melbourne

³ Australian Institute of Criminology, 2017, *Labour exploitation in the Australian construction industry: risks and protections for temporary migrant workers* and Australian Human Rights Commission and KPMG, 2020, *Property construction and modern slavery*.

⁴ Global Compact Network Australia and the Maritime Union of Australia, 2022, *Modern Slavery within the Maritime Shipping Supply Chains*.

FY23 actions

In FY23 we continued to strengthen our governance and processes for managing modern slavery and human rights risks.

Governance and policy

Human Rights Policy

In FY23 PoM developed a Board-approved Human Rights Policy to demonstrate our commitment to upholding human rights in our operations and supply chain. Our Human Rights Policy:

- is guided by the *United Nations Guiding Principles on Business and Human Rights*;
- defines what human rights mean to PoM;
- outlines our principles for respecting and protecting human rights;
- provides guidance on reporting breaches; and
- describes its application through our existing policies, plans and procedures that support human rights principles.

Employee engagement and training

Modern slavery awareness training

In FY23 PoM delivered modern slavery training for new starters. All employees who commenced work with PoM completed the online course on *Modern Slavery Act Awareness*.

Other relevant training

In FY23 PoM delivered mandatory Appropriate Workplace Behaviour, Financial Code of Practice and Whistleblower Policy training which was completed by 99 per cent of employees.

- **Appropriate Workplace Behaviour** training outlines the standards and expectations of employees for appropriate behaviour in the workplace, in particular obligations to act in good faith, with trust, ethically, and with integrity in the best interests of PoM.
- **Whistleblower Policy** training outlines PoM's obligations under state and federal whistleblower protection legislation, whistleblower protections, reporting processes and investigations of reportable conduct.
- **Financial Code of Practice** training outlines the standards of conduct for employees in relation to financial dealings and transactions and the internal controls and procedures to prevent, manage and report any suspected or actual incidents.

Supply chain practices

Modern slavery risk review and supplier engagement

PoM's suite of precedent contracts includes provisions that acknowledge modern slavery risks and outline the expectations of suppliers with regard to complying with modern slavery risk management and disclosure. They also promote continuous dialogue and information sharing with our suppliers and encourage action to identify and mitigate potential risks.

In FY23 PoM undertook due diligence on the modern slavery risk management practices of new suppliers we engaged to provide branded corporate goods and undertake engineering services, facilities management and cleaning services, and security services for the port.

FY23 risk assessment for new supplier engagement

Construction



Modern slavery risk management was assessed as part of the tender process for selecting suppliers for PoM's engineering services panel. This included identification of suppliers' intended subcontractors and consideration of their competency in managing sustainability related outcomes.

PPE and other branded corporate goods



Modern slavery risk management was assessed in selecting a new supplier for branded corporate goods.

Facilities management



Modern slavery criteria and PoM's requirements were included in the Request for Proposal and Expression of Interest documents.

Supplier Code of Conduct

In FY23 PoM commenced development of a Supplier Code of Conduct within the context of our procurement operations. This commitment will continue into FY24 as part of a broader audit of PoM's procurement practices. Moving forward we will implement a fit-for-purpose Code of Conduct and supplier engagement plan.

CASE STUDY:
FACILITIES MAINTENANCE AND CLEANING SERVICES



While conducting the Request for Tender process to select a facilities maintenance and cleaning services supplier, tenderers were asked to demonstrate the systems they had established to manage modern slavery risks in their operations and supply chain.

The selected supplier demonstrated evidence of a robust risk management system which included interviewing their top 25 suppliers annually regarding modern slavery risk management processes.

Modern slavery clauses relating to the supplier's operations and their supply chain were also included in the contract.

CASE STUDY:
SECURITY CONTRACT



In procuring a supplier to conduct security services for the port, PoM assessed each tenderer's processes in managing modern slavery risks and ensuring compliance with the Act.

The successful supplier demonstrated that they:

- perform a risk assessment of their tier 1 suppliers and suppliers who are determined to be high risk;
- have established controls in relation to ethical sourcing and modern slavery, including performing due diligence on new suppliers to determine their risk exposure;
- provide training on modern slavery policies and processes for employees who operate in high-risk areas; and
- have an accessible and publicised reporting mechanism for concerns or disclosures in relation to modern slavery.

Seafarer welfare

This year we provided ongoing financial support to our long-term community partners, Stella Maris and Mission to Seafarers, whose mission is to support the welfare of seafarers. In FY23 we also funded bespoke mental health first aid training for the employees and volunteers of these organisations to strengthen their ability to provide direct support to seafarers visiting Melbourne.

In FY23 we deepened our understanding of the experiences of seafarers visiting the Port of Melbourne through engaging with a range of stakeholders who support or promote seafarer welfare, including shipping lines, the Sustainable Shipping Initiative, Institute for Human Rights and Business, International Transport Federation, Rightship, Australian Maritime Safety Authority and the Maritime Union of Australia.

Our goal is to better understand the key challenges faced by seafarers and the most effective initiatives that PoM may take as the landlord manager of the port to better support seafarer welfare and reduce the risk of modern slavery. We will build on these relationships and learnings in FY24.

Grievance mechanisms

PoM has internal and external avenues for its directors, employees, contractors, suppliers and their family members to raise concerns regarding unethical behaviour or breaches of PoM's policies, including those relating to fraud, harassment or discrimination, misleading or deceptive conduct, unsafe work practices, and potential or actual instances of modern slavery.

PoM's independent external whistleblowing hotline service can be accessed via a toll-free hotline telephone number, online or by post. A report may be made anonymously using any of these methods.



Effectiveness of actions

The risk of modern slavery is captured in our corporate risk register as part of PoM's Enterprise Risk Management Framework.

All risks within the corporate risk register, including modern slavery, are reviewed by the Board on an annual basis. This includes a review of the current modern slavery risk evaluation and the effectiveness of our risk controls and treatments.

Our Modern Slavery Working Group is responsible for the implementation of modern slavery controls, monitoring their effectiveness and identifying opportunities to implement additional controls to mitigate modern slavery risks.

Key outcomes for FY23 include:

- **Formalised our commitment to upholding human rights in our operations and supply chain** – developed a Board-approved Human Rights Policy guided by the *United Nations Guiding Principles on Business and Human Rights*.
- **Greater employee awareness of modern slavery risks** – 100 per cent of our new employees completed PoM's modern slavery awareness training.
- **Strengthened understanding of areas of highest potential risk in our supply chain** – using FairSupply's risk profiling model we assessed potential modern slavery risks across ten tiers of our supply chain.
- **Increased supplier due diligence** – we incorporated modern slavery due diligence into the supplier selection process when engaging facilities management and security services suppliers.
- **Built stronger networks and relationships** with seafarer welfare organisations and related stakeholders to enable us to better understand and support initiatives to enhance seafarer welfare.

During the reporting period, no instances of modern slavery or labour rights concerns were reported through our internal or external whistleblower and grievance mechanisms.



Our forward focus

PoM is committed to identifying, mitigating, and eliminating modern slavery risks from our operations and supply chains.

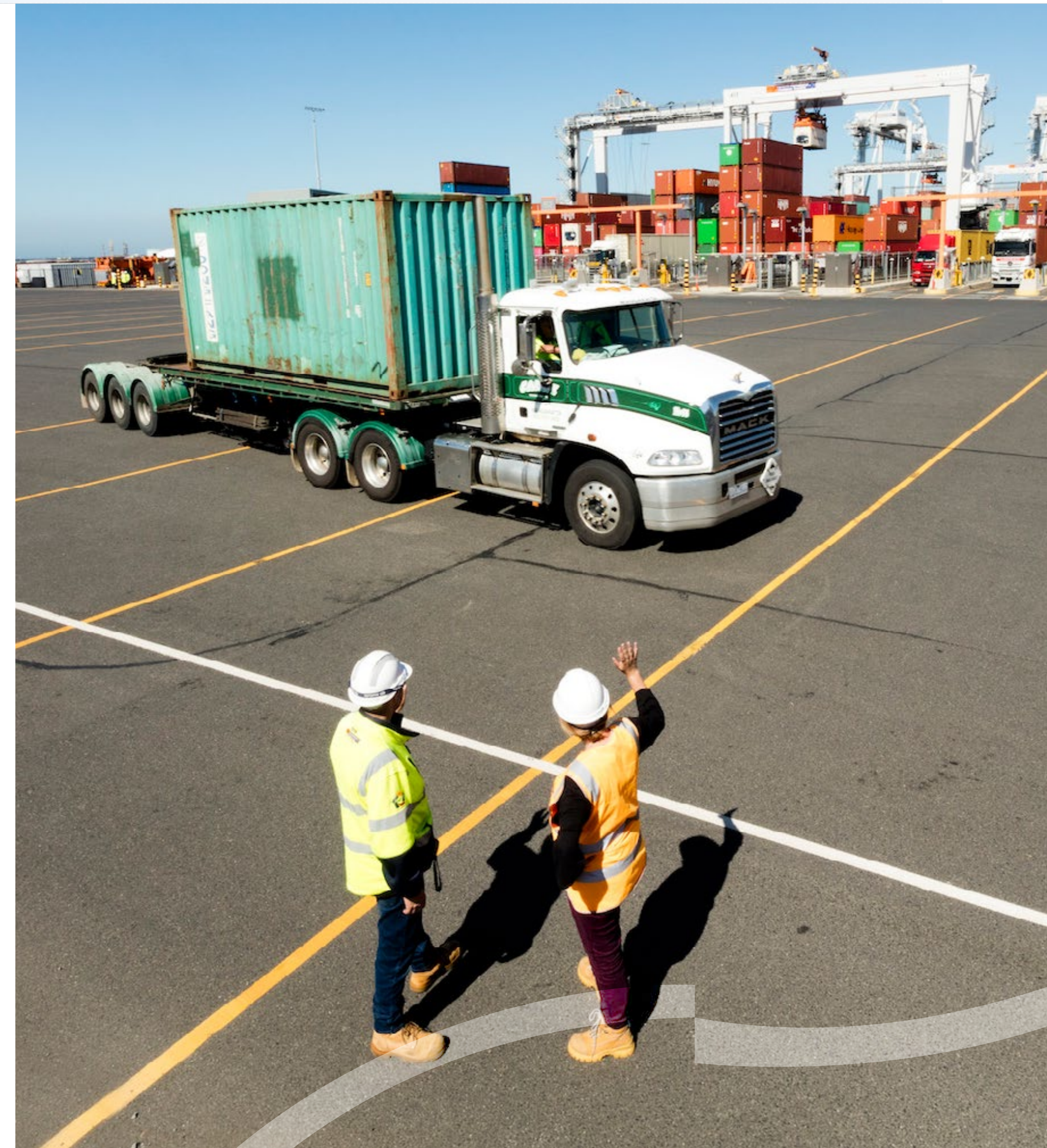
In future reporting periods, we will continue to build on our efforts by undertaking the following actions.

ACTION AREA	FOCUS
 Governance and policy	<p>Develop a modern slavery and human rights framework Identify priority areas and a roadmap for PoM to strengthen our management of modern slavery and human rights risks.</p> <p>Develop relevant progress metrics Enable PoM to track the delivery and effectiveness of our actions.</p>
 Operational practices	<p>Tailored training Develop and deliver tailored training for operational and procurement employees that engage and manage suppliers in high-risk categories.</p> <p>Collaborate on seafarer initiatives Work with relevant stakeholders to identify initiatives to enhance seafarer welfare in a manner appropriate to our role as a landlord port.</p>
 Supply chain practices	<p>Develop a Supplier Code of Conduct Define PoM's standards and expectations of suppliers regarding modern slavery and human rights practices.</p> <p>Engage with our highest risk suppliers Undertake a risk assessment of existing suppliers in high-risk categories.</p>



Appendix: Mandatory reporting criteria

	Modern Slavery Act 2018 (Cth) criteria	Reference in this Statement	Page
1	Identify the reporting entity and any entities the reporting entity owns or controls	About this statement	Page i
2	Describe the reporting entity's structure, operations and supply chains	About Port of Melbourne	Page 2
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern slavery risks	Page 9
4	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	FY23 actions	Page 13
5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Effectiveness of actions	Page 16
6	Describe the process of consultation with any entities the reporting entity owns or controls	Consultation and approval	Page i
7	Other relevant information	Our forward focus	Page 17



Contact us

Port of Melbourne welcomes feedback and questions about this Statement and our sustainability program.

Head Office

Level 19, 839 Collins Street, Docklands Victoria 3008
GPO Box 2149 Melbourne Victoria 3001

Phone: +61 1300 857 662

Email: sustainability@portofmelbourne.com

www.portofmelbourne.com



[@portofmelbourne](https://www.instagram.com/portofmelbourne)