



Sea Swift Modern Slavery Statement
Under The Modern Slavery Act 2018 (cth)
Reporting Period: 1 July 2024 – 30 June
2025



Sea Swift Modern Slavery Statement June 2025

30 September 2025

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Sea Swift acknowledges the Traditional Owners and Custodians and their continuing connection to the land and sea where we operate our services today.

We respectfully acknowledge the past, present and the emerging Elders and community leaders in the Torres Strait, Northern Peninsula Area, Eastern & Western Cape, Gulf, Roper River, Groote Eylandt Archipelago, East & West Arnhem Land and Tiwi Islands for they hold the memories, traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples of the region.

We understand the important role we can play by working together with local communities to deliver services that can have a positive and lasting economic and social impact for Aboriginal and Torres Strait Islander peoples.

We are committed to placing Aboriginal and Torres Strait Islander peoples and the residents of local communities in this region at the forefront of our decision making.



About this statement:

This is the sixth Modern Slavery Statement made pursuant to the requirement of the of the Modern Slavery Act 2018 (Cth) (the Act).

Sea Swift Group has engaged in a full process of joint consultation in the preparation of this Statement, and in relation to our modern slavery response generally. All risk assessment, due diligence, and remediation measures described in this Statement have equal application to all Sea Swift Group entities.

This Statement, builds on, and should be read in conjunction with, our previous modern slavery statements.



Our Approach

Sea Swift Pty Limited (“**Sea Swift**”) is committed to continuing the development of policies, systems and processes to respond effectively to the risk of modern slavery.

Sea Swift 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.

Sea Swift has taken and continues to take steps to improve our practices to combat modern slavery, human trafficking and ethical sourcing both within our business and in that of our supply chains.

Four Strategic Pillars underpin the Sea Swift strategy.

- People – Sea Swift believes in ongoing training of our staff;
- Performance – Sea Swift promotes prosperity within the broader Sea Swift community as well as within the communities that we serve;
- Partnerships – Sea Swift works in partnership with our suppliers to promote sustainability throughout the supply chain;
- Planet – Sea Swift strives to develop a culture throughout the group and the communities we serve that respects the environment that we work and live within.

During the current reporting period, Sea Swift has focused on the following key areas:

- Ongoing assessment of our operations, and supply chains for exposure to modern slavery;
- Incorporating modern slavery requirements into our standard contracts.

Mandatory Criteria 1 & 2:

The reporting entities, structure, operations and supply chains.

2.1 About the Sea Swift Group

For consistency and clarity, this section of the Statement mirrors the structure and content of last year's statement. There have not been any material changes in relation to these preliminary reporting requirements over the reporting periods.

Sea Swift is Northern Australia's largest shipping company and has provided essential services and project freight in the region since 1987. Sea Swift operates throughout Northern Australia's remote coastal and island communities, with an extensive distribution network across Far North Queensland and the Northern Territory.

2.2 Our Structure

The mandatory reporting entity under the Act is Sea Swift Pty Ltd

ABN 16 010 889 040.

The following entities are owned and controlled entities of QGIF Taylor Holdco Pty Ltd Group, however they are not, individually, mandatory reporting entities pursuant to the Act:

QGIF Taylor Holdco Pty Ltd

QGIF Taylor Bidco Pty Ltd

Sea Swift (Holdings) Pty Ltd

Swift (Finance) Pty Ltd

Sea Swift Pty Ltd

Sea Swift (NT) Pty Ltd

Perkins Lady Jan Pty Ltd

Perkins Maritime Pty Ltd

(together, **“the Group”** or **“Sea Swift Group”**).



The Group has a Board of Directors responsible for directing and controlling the group's activities. The responsibility for day-to-day operations and administration is delegated by the QGIF Taylor Board to the Executive Management team, consisting of the following executive members:

- Chris Pearce - Executive Chairman.
- Helen Mackail - Chief Financial Officer.
- Leanne Hulm - Chief Operating Officer (Acting).
- Tania Carvalho - General Counsel & Company Secretary.

The executive management team also includes the following senior executives.

- Clint Vicary – General Manager Business Development.
- Thomas Trevenen – National Manager of Safety & Risk.
- Tony Hayes – National Manager – Engineering.
- John Ward – National Manager Assets, Procurement & Property.
- Angus Carter – Head of Project Management.

2.3 Our Operations

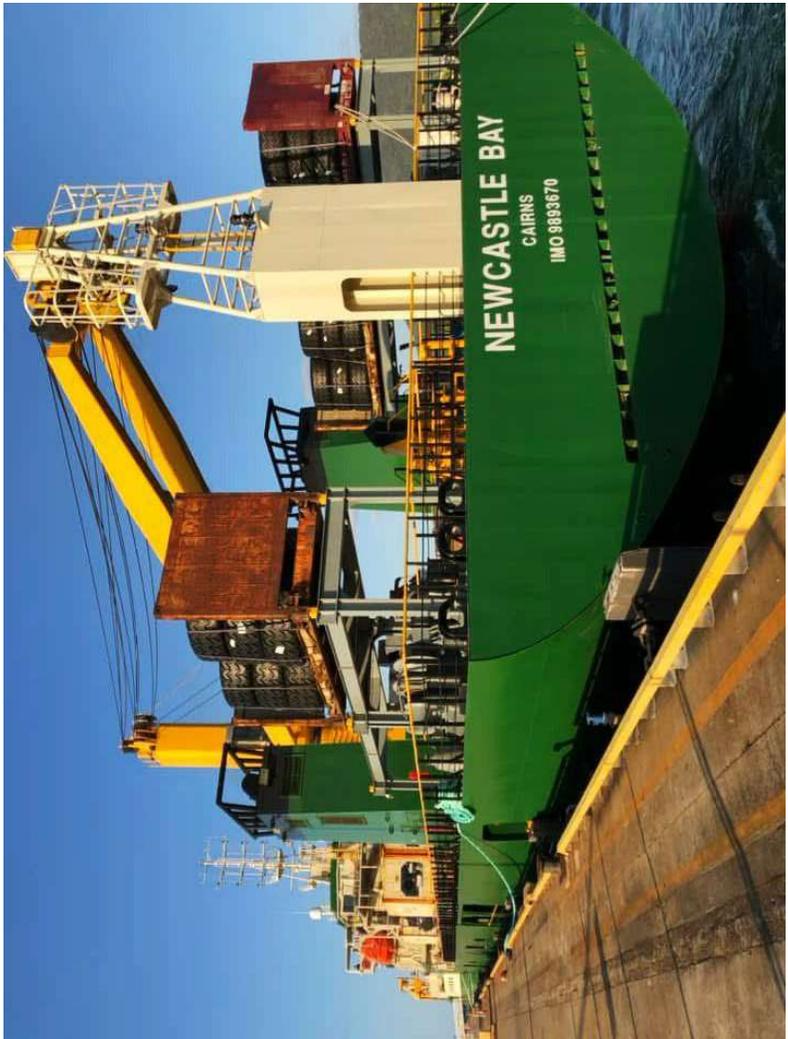
Sea Swift has a workforce of approximately 520 people and is headquartered in Cairns, Queensland, Australia.

During the reporting period it had depots located at Horn Island, Thursday Island, Seisia (Bamaga), Weipa and Badu Island in Queensland and Darwin, Gove (Nhulunbuy), Groote Eylandt in the Northern Territory.

Sea Swift manages and operates a fleet of 20 vessels servicing the area of operation across Northern Australia including the Queensland, Torres Strait and Northern Territory Island communities.

In addition to general cargo services, other services provided include:

- A Fuel Division involved in transporting more than 60 million litres of fuel per annum to customers located throughout Northern Australia.
- Supporting of National and International Government Agencies and Departments including re-supply and refueling of vessels.
- Project Charter - Vessel chartering.
- Engineering support.



General Cargo

Regular service freight



Project & charter

Tug & barge capability



Fuel

Fuel capabilities



Defence

Supporting Government agencies and naval forces to strengthen our northern borders



Engineering

Engineering capabilities

2.4 Supply Chains

During the reporting period Sea Swift has engaged a total of 584 direct suppliers.

The Sea Swift Group reviewed its modern slavery risk exposure assessment, using geographical and industry categories and sub-categories to identify suppliers' risk ratings (see figure 2). The assessment has identified that our two highest risk industries in the sixth reporting period consist of Fuel consumables and Diversified Support Services.

Fuel consumables remains Sea Swift highest dollar spend (see Figure 1.)

This is a result of bunkering the Sea Swift fleet, procuring fuel for delivery under contract and providing sales. The Fuel Consumables category also has the highest total theoretical slaves per total spend within Sea Swift's supply chain. To mitigate this risk Sea Swift has supply contracts in place and only procures Fuel Consumables from reputable national suppliers who have robust enterprise risk management frameworks, supported by governance structures that integrate modern slavery and ethical sourcing risk management into the culture of these organisations.

Sea Swift's direct supplier engagement continues to predominantly be with companies located in Australia (see Figure 3).

Figure 1: Top 5 supplier industries by amount paid in FY2025

Coal & Consumable Fuels
Diversified Support Services
Marine Ports & Services
Construction Machinery & Heavy Trucks
Insurance

Figure 2: Top 5 supplier industries by highest potential for modern slavery risk exposure in FY2025

Coal & Consumable Fuels
Diversified Support Services
Construction Machinery & Heavy Trucks
Marine Ports & Services
Hotels, Resorts & Cruise Lines

Figure 3: Top 4 supplier countries by amounts paid in FY2025

Australia
Malaysia
Singapore
Canada

- All references and analysis in this section relates to suppliers paid during the financial year ending 30 June 2025.
- Figures 1 to 3 are based on data analysis tools provided by Fair Supply and is based on analysis of our 2025 financial year spend data.
- The modern slavery risk exposure has been calculated using proprietary risk assessment and supply chain mapping technology developed by Fair Supply.
- Benchmark and reviewed annually for the purpose of Modern-Day Slavery reporting.

Mandatory Criterion 3:

Risks of modern slavery practices in Sea Swift Group operations and supply chains

As Sea Swift's anti-slavery approach matures, we recognise the importance of ongoing and updated risk identification and response. The potential areas where the Sea Swift Group may be linked to modern slavery through our operations, supply chains are not static. It requires persistent corporate vigilance.

Sea Swift is aware that it operates within a high-risk industry with respect to modern slavery and ethical sourcing. The shipping industry, particularly in Southeast Asia, is a known high-risk jurisdiction due to several compounding factors including a heavy reliance upon migrant seafaring workers that originate from high-risk geographies, including Indonesia, who are more susceptible to deceptive recruitment through migrant agents and debt bondage.

Sea Swift has sought to mitigate the modern slavery and ethical sourcing risks arising from its presence in the shipping industry.

For all vessels operated by Sea Swift, the group ensures that no labour hire services are engaged and that any crew are Australian based and employed directly under a Sea Swift contract which adheres to the Maritime Labour Convention, 2006.

Sea Swift has an expectation of engaged suppliers to be able to provide modern slavery and ethical sourcing policies and verifiable evidence of adherence to these policies.

No actual or suspected incidences of modern slavery were identified in our operations and supply chains during this reporting period.

3.1 Operations

Sea Swift's primary operations continue to involve in the provision of regular schedule cargo services to Northern Australia.

Due to workforce composition, industry types, and award-compliant EBA in place, exposure to modern slavery practices remains most unlikely at a direct operational level.

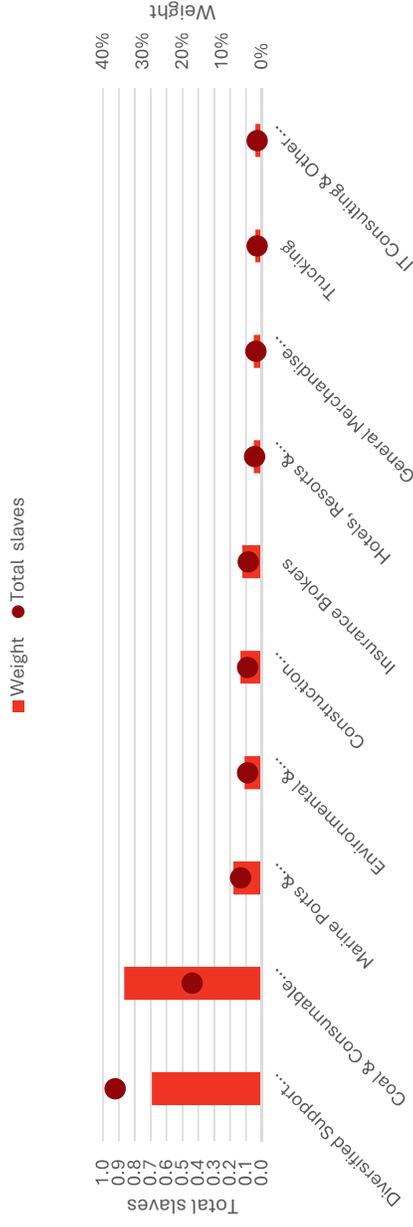
3.2 Supply Chains

Sea Swift's Group's analysis has identified several potential modern slavery risks within our supply chains which are summarised below. These risks have been identified by reference to the 2018 Global Modern Slavery Index.

- **Coal & Consumable Fuels** is the greatest area of spend within the group, as used for both operation and on-sale, is acknowledged as high risk due to low level visibility in oversight of extraction of raw materials.
- **Diversified Support Services** industry category, we continue to recognise the potential operational connection between our day-to-day activities and areas of elevated domestic modern slavery risk within Australia.
- **Construction Machinery & Heavy Trucks** industry category, which includes our vessels and marine parts, is high risk due to the complex supply chains with low levels of visibility over the manufacturing and extraction of raw materials.

Given that these industry categories have been flagged over subsequent reporting periods, we will continue to focus on tailoring our future due diligence action towards these industries.

Absolute slave count



The graph shows the industries in our operations and supply chains with the highest risk of modern slavery relative to spend as identified by our risk assessment during the period 01/07/2024 to 30/06/2025.

Mandatory Criterion 4:

Actions taken by the Sea Swift Group to assess and address the risk of modern slavery practices in its operations and supply chains.

Our risk assessment process

After a comprehensive analysis of our direct suppliers during the previous reporting period and improvements within our Procurement framework specifically, and general policy and procedures, the group has moved from analysis into implementation to ensure that any risk of modern slavery within the supply chain is mitigated to a level that aligns with the expectations of responsible corporate governance within Australia.

Our policies and Risk Management approach

During the reporting period, we have continued to make improvements to our Procurement framework and the practices and processes as they apply to modern slavery.

We have sought to implement these improvements via the following measures:

- Procurement Policy that requires employees to ensure that any procurement on behalf of Sea Swift is undertaken in accordance with modern slavery legislation.
- Implementation of Procurement Procedures which require Staff to make every reasonable and practicable effort to avoid, reduce or manage all risks (including modern slavery) that are involved in any purchase. The determination of best value must include consideration of sustainability (of which modern slavery is a component) - this has been included in both the tender evaluation plan and Request For Quote templates

- Maintain the Sea Swift Supplier Code of Conduct (published on Sea Swift's public website) that sets out expectations of suppliers in relation to modern slavery elements including:
 - Human rights;
 - Involuntary and underage labour;
 - Working hours, wages and benefits;
 - Freedom of association and collective bargaining;
 - Child safety.
- Our standard Master Goods and Services Agreements require our suppliers to comply with the Act and warrant that they have no knowledge of any modern slavery instances within their operations and supply chains and will take reasonable steps to assess and address risks of modern slavery and report any actual or suspected modern slavery findings.
- The Terms and Conditions of our Purchase Orders include similar modern slavery specific provisions, including requiring our suppliers to take reasonable steps to ensure there is no modern slavery in their supply chains and operations and will take reasonable steps to provide Sea Swift with information about their modern slavery risk mitigation.
- We have continued the process of creating corporate and strategic risk registers, including Procurement risks and risks associated with modern slavery.
- Training in modern slavery awareness and obligations has been provided to key staff involved in purchasing activity (including Managers and buyers) and the Executive Leadership Team. The online eLearning modules offered is sourced from the Australian Border Force website.

These policies and procedures will continue to assist the Group by building capacity to address modern slavery risk within the procurement section of the business.

Mandatory Criterion 5:

How the Sea Swift Group assesses the effectiveness of the actions taken to address the risk of modern slavery practices in its operations and supply chain

Sea Swift Group has an established framework to allow us to continuously monitor our modern slavery response.

Action area

KPI for FY2025

Internal Risk Assessment
Continued audit and review of our current business policies and processes regarding recruitment and treatment of employees. Further emphasis placed on suppliers to provide independently verified evidence showing adherence to minimizing modern slavery within the supply chain.

Supplier Engagement

Increased risk assessment of total procurement spend.
Incorporating modern slavery risk mitigation measures into supplier onboarding process.
Increasing number of suppliers that are assessed and subject to specific due diligence and / or audit, focusing on high-risk suppliers in the international shipping industry.

Continuous improvement of internal governance frameworks

A Published 'Supplier Code of Conduct' that include modern slavery provisions.
Published 'Purchase Order Terms and Conditions' that include modern slavery provisions.
Modern slavery and ethical sourcing addressed in our Procurement framework.
Continued inclusion of modern slavery and ethical sourcing provisions in supplier contracts and purchase order terms.
Continued development of modern slavery focused tender process and supporting templates.
Continued collaboration with key stakeholders.

Modern slavery related internal education and training

Specific updated training provided to Executive, Management and key employees that are involved with procurement.
Awareness training provided to all staff members.

Grievance procedures and whistleblower facilities

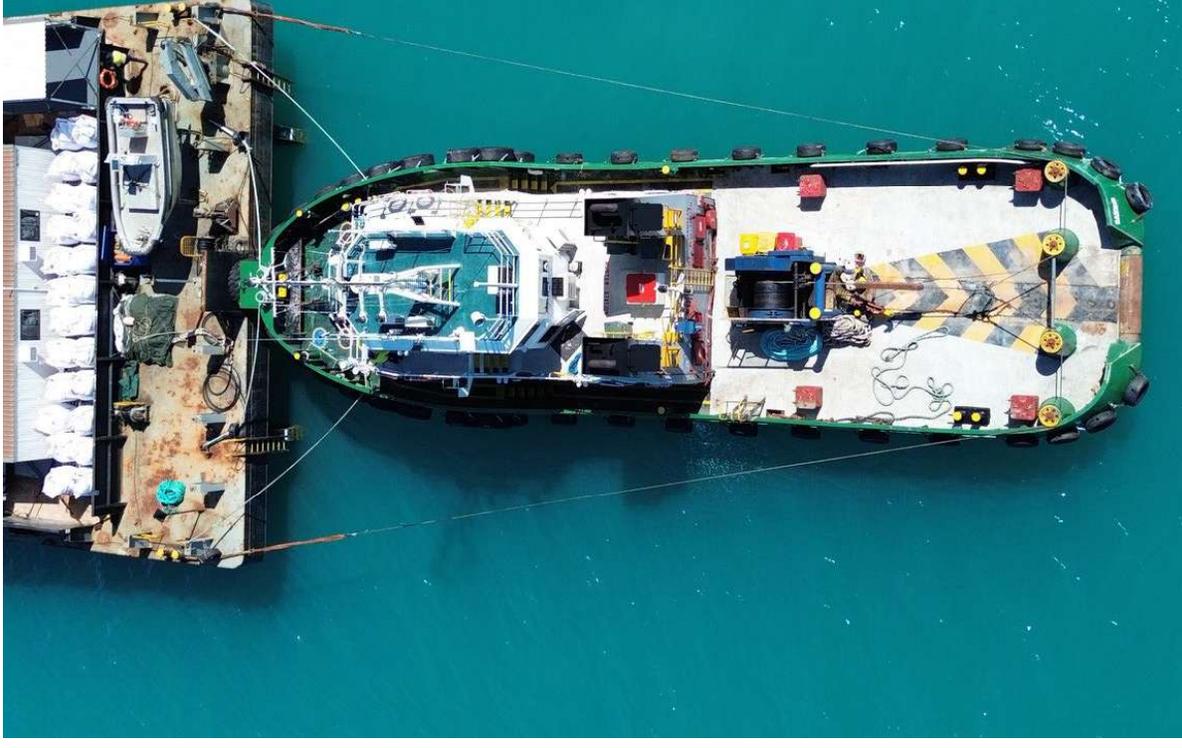
Update of existing Whistleblower policy to incorporate modern slavery provisions.
Regular analysis of level of uptake and use (or non-use) of grievance mechanism.

Our next steps

During the next reporting period, Sea Swift intends to focus our resources on the following actions:

- Further implementing our gap analysis with the continued development of the risk register;
- Inclusion of Ethical Sourcing component in conjunction to Modern Slavery policy to further strengthen Sea Swift's approach to elimination of Modern Slavery within the business and related supply chain;
- Improved and updated training regarding Modern Slavery and Ethical Sourcing for new staff and Board members;
- Approach Sea Swift's high-risk suppliers for reports (self-assessment questionnaire) on their actions to address modern slavery risks and use those reports to plan actions that minimise risk exposure to Sea Swift;
- Develop a Modern Slavery and Ethical Sourcing Action Plan to address any risks identified;
- Develop a Modern Slavery and Ethical Sourcing information page on the intranet (Procurement Hub) providing key information and links to supporting material (including further reading and training);
- Continue to align to goal of industry leading best practice to further reduce modern slavery and ethical sourcing exposure throughout the business and its entire supply chain;
- Keep the Sea Swift Executive Team and Board apprised of any modern slavery risks and action taken.

keeping
northern australia
connected



Mandatory Criterion 6:

The process of consultation with entities owned or controlled by QGIF Taylor Holdco Pty Ltd Group and Approval of Statement by Principal Governing Body

- We have undertaken all necessary consultation with each of the Group's owned and controlled entities has occurred throughout the reporting period, and in the preparation of this Statement. The Sea Swift board is a group board that has oversight over the mandatory reporting entity and all owned and controlled entities, enabling communication regarding modern slavery risk to occur in a unified manner throughout the reporting period.
- Consultation has also occurred between the Sea Swift Group and its investor, to identify modern slavery risks within its operations and supply chains.
- The Sea Swift Group will continue consultation between Sea Swift Pty Ltd and controlled entities, including ongoing circulation of all communication relating to identifying, assessing, and addressing modern slavery. We recognise there is always more to be done and no single goal or end point in our efforts, short of the eradication of modern slavery in our operations and supply chains. All entities within the Sea Swift group remain committed to a collaborative effort in future reporting periods to prioritise the identification and mitigation of modern slavery risk.
- Prior to providing Board approval, the Sea Swift Audit and Risk Committee, the Executive Management Team and the Modern Slavery Working Group have each reviewed and approved this Statement.

Approval of Principal Governing Body

This statement has been approved by the Board of Directors of each of QGIF Taylor Holdco Pty Ltd, QGIF Taylor Bidco Pty Ltd, Sea Swift (Holdings) Pty Ltd, Sea Swift (Finance) Pty Ltd, Sea Swift Pty Ltd, Sea Swift (NT) Pty Ltd, Perkins Lady Jan Pty Ltd, Perkins Maritime Pty Ltd collectively known as the Sea Swift Group of Companies ("Sea Swift").

This Statement has been signed by:



Chris Pearce
Executive Chairman

Date: 11/12/2025





Modern Slavery Statement FY25 approval paper - Board resolution - 27 November

From Tania Carvalho <vania.carvalho@seaswift.com.au>

Date Wed 10/12/2025 9:49 AM

To John Ward <johnw@seaswift.com.au>; John Macallister <john.macallister@seaswift.com.au>

Modern Slavery Statement FY25 The Modern Slavery Statement FY25 approval paper was noted and taken as read. J Ward introduced J Macallister to the Board.

The NMAPP provided a high level summary of the paper.

The Board commented that modern slavery must be carefully managed and addressed where Sea Swift is sourcing new builds overseas. It was agreed that the base template used for the Statement is to be externally reviewed before the next Statement is prepared.

The Boards of Sea Swift:

- (a) approved the Sea Swift Modern Slavery Statement for the period ending 30 June 2025; and
- (b) authorised the Executive Chairman to sign the 'Sea Swift Modern Slavery Statement June 2025' on behalf of the Company or any document, which may be necessary or required to give effect to this resolution.

Tania Carvalho | General Counsel & Company Secretary

Sea Swift Pty Ltd

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Sea Swift acknowledges the Traditional Owners and Custodians and their continuing connection to the land, sea and country where we operate our services today.



BOARD PAPER – Approval

Agenda Item No.: 5.1

Agenda Item: Modern Slavery Statement FY 2025

Paper Type: For Decision

Author: John Macallister – Procurement Specialist

Recommended resolution/s

It is recommended that the Boards of Sea Swift:

- (a) approve the Sea Swift Modern Slavery Statement for the period ending 30 June 2025; and
- (b) authorise the Executive Chairman to sign the ‘Sea Swift Modern Slavery Statement June 2025’ on behalf of the Company or any document, which may be necessary or required to give effect to this above resolution.

1. CONFLICTS OF INTEREST

There are no known conflicts of interest.

2. EXECUTIVE SUMMARY

Sea Swift Pty Ltd is required to provide an annual Modern Slavery Statement on the risk of modern slavery, and Sea Swift’s response to it. The next statement will address the 2024-2025 reporting period and is due prior to 31 December 2025. This paper discusses Sea Swift’s response to Modern Slavery in the reporting period. Attachment 1 of this paper contains Sea Swifts draft sixth Modern Slavery Statement for submission to the Board.

The Modern Slavery Statement was discussed by the Audit and Risk Committee at its meeting in October, with Committee endorsement of the Statement for presentation for Board approval provided. That Board approval is now sought.

3. BACKGROUND

The *Modern Slavery Act 2018* (the Act) requires companies operating in Australia with annual revenues above \$100 million to report on their efforts to assess and address modern slavery risks.

By way of background, the Act came into effect on 1 January 2019, and Sea Swift has submitted yearly Modern Slavery statements since December 2020 to meet the requirements of the Act. Modern slavery refers to serious situations of exploitation resulting in a person’s freedom being undermined or deprived. Eight types of exploitation are

captured under the Act: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, worst forms of child labour and deceptive recruiting.

Sea Swift is committed to ensuring that no form of modern slavery is present in its operations. This is not only a legal requirement but also an ethical responsibility aligned with Sea Swift's values of accountability and respect.

Sea Swift acknowledge that Modern Slavery can occur within the supply chain and undertakes due diligence to reduce the company's exposure.

Sea Swift's Modern Slavery Response:

The current reporting period builds on the milestones achieved during the previous periods.

Sea Swift's risk of exposure during the reporting period has been analysed using the resources previously supplied by 'Fair Supply'. Data analysis was undertaken to verify supplier spend by both industry and country of origin.

The risk of Modern Slavery within Sea Swift's supply chain, with data analysis completed, shows the total theoretical slaves across the industries we source from for our total spend being 2.049 equating to 0.018 weighted slaves per \$M invested.

Fuel consumables remain Sea Swift's highest dollar spend, with bunkering of fleet and procuring of fuel for delivery exceeding \$39M and has the highest total theoretical slaves per total spend within Sea Swift's supply chain.

To mitigate this risk Sea Swift has supply contracts in place and only procures Fuel Consumables from reputable national suppliers who have robust enterprise risk management frameworks. These are supported by governance structures that integrate Modern Slavery risk management into the culture of these organisations

Modern Day Slavery training has also been completed by all Sea Swift Executive, Management and key employees actively involved in Procurement via the Learning Management System (LMS).

Actions for the next reporting period:

Inclusion of Ethical Sourcing reference within the Procurement Policy

The inclusion of an Ethical Sourcing reference within the Procurement Policy will strengthen Sea Swift's overall approach to Modern Slavery. Whilst a large majority of suppliers do not have Modern Slavery Statements, due to not exceeding turnover of \$100 million, there should be a visible and verifiable way of tracing any goods that are supplied via request for Ethical Sourcing policies and supply chain verification.

Enhanced Supplier Due Diligence:

As part of our commitment to further improving our risk management processes, Sea Swift will conduct deeper due diligence on new suppliers, particularly those in high- risk sectors. This will include requests for more information prior to onboarding of new suppliers

including Modern Slavery and Ethical Sourcing Policies and could extend to both on- site audits or the use of third-party verifications.

Expansion of Modern Slavery and Ethical Sourcing Training:

Management will roll out the Modern-Day Slavery training available in the LMS to a broader group of the Sea Swift workforce that procure goods on behalf of Sea Swift. Management together with Learning & Development Business Partner to develop a learning module focused on Ethical Sourcing to roll out to the business.

4. STRATEGIC CONSIDERATIONS AND RISKS

Implications to Business Operations

Addressing Modern Slavery risk in Sea Swift’s supply chains forms an important element in the company’s risk framework.

A comprehensive response to Modern Slavery does not just address the risk but outlines Sea Swift’s commitment to Industry Best Practice and Good Corporate Governance and creates an opportunity to effectively develop, monitor and manage the company’s supply chain more effectively.

Strategic Implications

As above.

Financial Implications

Under the Act there are currently no financial penalties for noncompliance with the Modern Slavery Act. The current impacts would be reputational only with the Act providing for a “naming and shaming” regime for this companies that are non-compliant or fail to report. All other activities for this proposed Modern Slavery statement for the current reporting were achieved ‘in house’ by the Procurement Specialist.

RISK ANALYSIS AND ALIGNMENT TO RISK APPETITE STATEMENT

Risk Analysis

Identified Risk	Likelihood	Consequence	Risk Rating	Strategy to Manage Risk
Not taking further action to address Modern Slavery risk as written in the statement.	Possible.	Reputational damage. Loss of revenue.	Moderate.	Review resource allocation.

Making false statements or omitting material information.	Low.	May invoke consequences under the Commonwealth Criminal Code.	High.	Utilising recommendations of Fair Supply to prepare ongoing annual Statements.
Not submitting the Statement by the due date.	Possible.	The responsible Minister is authorised publish information about that organisation's failure to comply with the Act.	Moderate.	KPI of Management Responsibility.
Not addressing the mandatory reporting criteria.	Possible.	The responsible Minister is authorised publish information about that organisation's failure to comply with the Act.	Moderate.	Utilising recommendations of Fair Supply to prepare ongoing annual Statements.

Risk Appetite Statement

Legal & Compliance	Sea Swift acts with integrity and ethics and has zero tolerance for non-compliance with our codes of conduct, governance and legislative requirements.
Brand & Reputation	Sea Swift is proud of its standing within the community and the region. Sea Swift has minimal appetite to activities that could harm its brand or reputation.
	Sea Swift does however accept that there may periodically some temporary periods where careful management of adverse commentary from third parties is required.

5. PRIOR BOARD/COMMITTEE CONSULTATION

The Audit and Risk Committee provided endorsement of the draft Sea Swift Modern Slavery Statement for FY25 reporting period at the October 2025 meeting.

6. LEVEL OF APPROVAL REQUIRED UNDER DELEGATIONS OF AUTHORITY

The Modern Slavery Statement requires Board approval prior to submission to be regarded as compliant with Federal Government legislation as outlined in the act.

Author

John Macallister – Procurement Specialist

Executive Leadership Sponsor/s

Chris Pearce, Executive Chairman

Helen Mackail, Chief Financial Officer

John Ward, National Manager Assets, Procurement and Property

Signed by:



Executive Chairman

Date: 20 Nov 2025

ATTACHMENTS

1. Annexure A - Sea Swift Modern Slavery Statement FY 30 June 2025

Sea Swift Modern Slavery Statement FY30 June 2025

Final Audit Report

2025-12-11

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